

# BCAMP

**Benicia Community Air Monitoring Program** <[beniciacommunityairmonitoringprogram.org](mailto:beniciacommunityairmonitoringprogram.org)>

April 11, 2023

Bay Area Air Quality Management District

Monitoring, Meteorology and Measurement Division [dmadrigan@baaqmd.gov](mailto:dmadrigan@baaqmd.gov)

sent via email

## **SUBJECT: Reg 12, Rule 15: Comments on Air Monitoring Plans & Quality Assurance Project Plans**

Thank you for the opportunity to comment on the Air Monitoring Plans (AMPs) and Quality Assurance Project Plans (QAPPs) from the five Bay Area refinery open path fence line systems that now include the measurement of hydrogen sulfide (H<sub>2</sub>S). From the community perspective, the primary goal of Regulation 12, Rule 15 (Rule 12-15) must be to reduce fugitive emissions that impact the health and safety of people living near refineries and refinery-related facilities where fugitive toxic gases routinely escape from valves, compressors, other ground-level processing units, and storage tanks. Of mounting concern are human health risks associated with daily chronic exposures to low-level concentrations of fugitive gases such as cancer-causing benzene and the deadly, odorous neurotoxin, H<sub>2</sub>S, as well as other toxic and/or noxious air contaminants. These compounds mixing with PM<sub>2.5</sub> and airborne pollutants from other urban sources cumulatively diminish the quality of the air we breathe and compromise human respiratory, neural, and cardiac functions.

Over the past six years after the adoption of Rule 12-15, the roll-out of these systems became a moving target and their performance record unreliable, with data reporting controlled exclusively by the facilities and their contractors. The establishment of technology-specific performance criteria established by the Bay Area Air Quality Management District (BAAQMD or Air District) for H<sub>2</sub>S provides a critical step towards regaining public trust by providing a baseline for system performance required to be monitored by the fence line systems. However, after review of the posted AMPs and QAPPs along with the two letters to the refineries that specifically contain performance criteria necessary for approval, only the Martinez Refining Company met minimum Air District requirements as outlined in the various letters issued by them. It is alarming to see that four of the five refineries refused to fully adopt or outline how these new criteria would be met: Chevron, Phillips 66, Tesoro and Valero. Further, we found it highly disturbing that the four facilities presented similar if not identical incidents of compliance failures.

The fact that each of the four refineries contracts the same monitoring management company raises serious questions about its critical role and responsibilities in regard regulatory compliance. Under direction of its contractor, these four refineries installed H<sub>2</sub>S fenceline systems that continue to fail to meet performance standards set by Rule 12-15, with the result that the District receives untrustworthy, unreliable, obfuscatory data reporting from those fenceline systems. Each refinery is ultimately responsible for the management and operation of its system under direction of its contractor. The four facilities' refusal to fully comply with Rule 12-15's AMP/QAPP requirements for H<sub>2</sub>S systems is absolutely unacceptable from the perspective of community health and safety. Given that Rule 12-15 was adopted

in 2017—six years ago—and that letters have been repeatedly sent to all five refineries in regard compliance on fenceline monitoring for H<sub>2</sub>S, it is high time that the District strictly enforce the Rule's performance standards for H<sub>2</sub>S systems, apply maximum fines for compliance failure until criteria are met, and require that a reliable, proven-trustworthy system be installed, such as Air Optics' H<sub>2</sub>S fenceline system successfully operating at MRC, with accepted methods and proven capacity to meet all performance criteria set by Rule 12-15.

It should also be noted that to fully regain public trust, further modification of the AMPs and QAPPs to address the required criteria must occur to ensure that all the data generated by the H<sub>2</sub>S systems are accurate, precise, transparent and can be independently recreated to validate results presented by the refineries. Ideally, similar performance criteria must be developed for all other compounds covered by Rule 12-15, as we previously stated in our letter to Jerry Bovee, dated December 5, 2022, regarding District upgrades to the Rule pertinent to facilities' H<sub>2</sub>S systems.

Provided below are specific examples outlined in the two letters sent by BAAQMD to the five refineries that were not addressed in submitted AMPs and QAPPs. Please note certain portions of our comments addressing individual facilities (Chevron, Phillips66, Tesoro and Valero) are repeated, given the similarities in their failures identified, and what we believe BAAQMD must do to enforce compliance.

Comments on Chevron Products Company plans do not:

- Adequately address issues 1 and 2 of the letter dated 7/15/2022 among others.
- Define why the Method Detection Limit (MDL) method of three standard deviations of the last seven five-minute averages should be utilized. It is not clear why this method was chosen.
- Adequately address a large majority of issues raised in the letter dated 12/22/2022. Most importantly, the requirement for an average of 15 ppb Quantification Detection Limit (QDL) and 15% accuracy and precision are not integrated into the Quality Assurance Project Plans.

While these are not the only issues where Chevron does not adequately address the Air District's requirements and comments, these examples demonstrate an unwillingness to meet the requirements. The plans should be rejected, and facility fined to the maximum extent possible until all Air District requirements are met, and comments adequately addressed. In addition, according to Table 4-2 of the QAPP, any concentration above 30 ppb will be flagged for review and is therefore potentially not available to the public until quarterly reports are submitted. This defeats the purpose of real-time monitoring and must not be allowed. For the public's benefit, access to reliable real time data reporting is essential, such that a more realistic review time be required that would avoid the problem of the refineries' fenceline monitoring websites routinely displaying delayed data with noted flagging.

Comments on Phillips 66 plans do not:

- Adequately address a large majority of issues raised in the letter dated 8/15/2022.
- Define how the MDL will be calculated.
- Adequately address a large majority of issues raised in the letter dated 12/22/2022. Most importantly, the requirement for an average of 15 ppb QDL and 15% accuracy and precision are not integrated into the Quality Assurance Project Plans.

While these are not the only issues where P66 does not adequately address the Air District's requirements and comments, it demonstrates an unwillingness to meet the requirements. The plans

should be rejected, and facility fined to the maximum extent possible until all Air District requirements are met, and comments adequately addressed. In addition, the QAPP states concentrations above a “certain level” will be flagged for review and potentially not available to the public until quarterly reports are submitted. This defeats the purpose of real-time monitoring and must not be allowed, with a more realistic review time required the data displayed on the website with the flagging noted.

Comments on Tesoro Refining and Marketing plans **do not**:

- Adequately address the differences between technologies. The only mention in the AMP regarding the H<sub>2</sub>S is that the technology is comparable to UV-DOAS as far as operations are concerned. This is not factually correct as the two technologies are completely different from each other. This also leads to the conclusion that any Standard Operating Procedures (SOPs) will also be inadequate.
- Adequately address a large majority of issues raised in the letter dated 7/15/2022.
- Adequately outline how an MDL will be calculated other than taking between 7 and 15 measurements and a standard deviation calculated.
- Adequately address a large majority of issues raised in the letter dated 12/22/2022. Most importantly, the requirement for an average of 15 ppb QDL and 15% accuracy and precision are not integrated into the Quality Assurance Project Plans.

While these are not the only issues where Tesoro does not adequately address the Air District’s requirements and comments, it demonstrates an unwillingness to meet the requirements. The plans should be rejected, and facility fined to the maximum extent possible until all Air District requirements are met, and comments adequately addressed. In addition, according to Table 11 of the QAPP, any concentration above 50 ppb will be flagged for review and potentially not available to the public until quarterly reports are submitted. This defeats the purpose of real-time monitoring and must not be allowed, with a more realistic review time required and the data displayed on the website with the flagging noted.

Comments on Valero plans **do not**:

- Adequately address the differences between technologies. The only mention in the AMP regarding the H<sub>2</sub>S is that the technology is comparable to UV-DOAS as far as operations are concerned. This is not factually correct as the two technologies are completely different from each other. This also leads to the conclusion that any Standard Operating Procedures (SOPs) will also be inadequate.
- Adequately address a large majority of issues raised in the letter dated 7/15/2022.
- Adequately outline how an MDL will be calculated other than taking between 7 and 15 measurements and a standard deviation calculated.
- Adequately address a large majority of issues raised in the letter dated 12/22/2022. Most importantly, the requirement for an average of 15 ppb QDL and 15% accuracy and precision are not integrated into the Quality Assurance Project Plans.

While these are not the only issues where Valero does not adequately address the Air District’s requirements and comments, it demonstrates an unwillingness to meet the requirements. The plans should be rejected, and facility fined to the maximum extent possible until all Air District requirements are met, and comments adequately addressed. In addition, according to Table 9 of the QAPP, any concentration above 30 ppb will be flagged for review and potentially not available to the public until quarterly reports are submitted. This defeats the purpose of real-time monitoring and must not be

allowed, with a more realistic review time required and the data displayed on the website with the flagging noted.

It is apparent that only the Air Optics open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter as defined by the requirements in their QAPP. The Unisearch TDL being used at the other four refineries does not meet these requirements, as demonstrated by their QAPPs, and the operational and data display requirements in the QAPPs are not uniform across the four refineries. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters and requirements. All Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required in the near future. We truly feel this will help reestablish community trust in the data generated by the technologies in use as part of Rule 12-15.

Thank you very much for your consideration of our comments. We honor the responsibilities entrusted to you. We look forward to participating with the Air District to help update Rule 12-15 to address the many issues raised in this letter. We recommend that a public meeting, hosted by BAAQMD, be held in the near future to follow up on questions and comments raised by the public and to further advance upgrades to Rule 12-15 that would support its enforcement for accurate, reliable monitoring, transparent real time emissions reporting, and efficient timely "fixes" at refineries for the benefit of communities.

Respectfully,

The BCAMP Board of Directors

David Lindsay, Chair

Kathy Kerridge, Treasurer

Nancy Lund, Secretary

Bart Sullivan, member

Marilyn Bardet, member

Cc

Jerry Bovee, BAAQMD Air Quality Engineering Manager

Kate Hoag, BAAQMD Meteorology and Measurement Division

BAAQMD Board of Directors

Steve Young, Mayor of Benicia

Benicia City Council

Shoshana Wechsler, Sunflower Alliance

350 Bay Area

Communities for a Better Environment

BAAQMD Coalition



# SOLANO COUNTY

April 17, 2023

Mr. Lapka,

My name is Supervisor Monica Brown. I represent Solano County District 2 and I am writing on behalf of my constituents.

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries do not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This is not just about following the rules, it is about public health and safety. We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

The District should have a public meeting on this important topic.

As the Supervisor that represents Valero, the only oil refinery in Solano County, it is imperative they are held accountable to the rules. I am calling upon you to enforce these rules. My constituents in Solano County deserve the agency to keep themselves and their families safe. It is vital that the refineries be held accountable, not just by paying fines, but by installing the equipment that will meet the Air District's requirements without delay.

Regards,

A handwritten signature in blue ink that reads "Monica Brown".

Supervisor Monica Brown  
Solano County Board of Supervisors, District 2

April 20, 2023

Bay Area Air Quality Management District  
Attn: Joe Lapka  
375 Beale St., Suite 600  
San Francisco, CA 94105

Dear Mr. Lapka,

I write to comment on the Draft Refinery Fenceline Air Monitoring Plans from Valero, Phillips 66, Tesoro, Chevron, and the Martinez Refining Company. The public documents provided show that of these five refineries, only one, the Martinez Refining Company, is using equipment that meets the requirements spelled out in the Air District's December 22, 2022 guidance. The systems being used at the other four refineries do not meet these requirements. All refineries should be utilizing equipment that meets the Air District requirements. Rigorous enforcement of these requirements are essential to public health and safety. It's also important for maintaining communities' trust in the data (and in the Air District). When refineries operate monitoring systems without adequate quality standards in place, they undermine the credibility of current *and* future monitoring efforts.

Communities have a right not only to know what they are breathing in real time but also to be able to review, audit, and analyze past data. The Air District's guidelines for quarterly reporting in csv format (specified in Attachment 2 of the December 22, 2022 letters) are an important step toward providing genuine public access to data. The Air District should ensure refineries' adherence to these reporting standards, in addition to their installation and operation of appropriate monitoring equipment, and should further make the submitted csv files available for direct download by members of the public. Direct access to csv files (or, better, API access) should be a top priority for the Air District, as it would allow independent organizations to craft dashboards and other interfaces to best serve specific audiences. It is my hope that subsequent guidance from the Air District will direct refineries to (a) report *all* fenceline monitoring data in csv and API format and (b) report data on a more frequent basis – ideally daily.

As a researcher who has chronicled the history of Bay area activists' fight for fenceline monitoring, and worked with them to create meaningful analyses and visualizations of fenceline monitoring data, it is disappointing to see Bay area refineries seeming to stand in the way of the public right to know, by repeatedly submitting monitoring and quality assurance plans that fail to adhere to the Air District's guidance. I hope to see them brought into compliance quickly so that

surrounding communities can benefit from credible, accessible information about what's in the air they breathe.

Sincerely,

A handwritten signature in black ink that reads "Gwen Ottinger". The script is fluid and cursive, with the first name "Gwen" and last name "Ottinger" clearly legible.

Gwen Ottinger



**Kevin Buchan**  
Senior Manager  
Bay Area Regulatory Affairs

April 20, 2023

Joe Lapka  
Senior Air Quality Specialist  
Bay Area Air Quality Management District  
370 Beale Street, Suite 600  
San Francisco, CA 94105

sent via email: [jlapka@baaqmd.gov](mailto:jlapka@baaqmd.gov)

Re: WSPA Comments for the Five Bay Area Refinery Air Monitoring Plans Under Regulation 12-15

Dear Mr. Lapka,

The Western States Petroleum Association (WSPA) is a non-profit trade association representing companies that explore for, produce, refine, transport and market petroleum, petroleum products, natural gas and other energy supplies in California, Arizona, Nevada, Oregon, and Washington. Our members in the Bay Area have operations and facilities regulated by the Bay Area Air Quality Management District (BAAQMD or District).

### **Executive Summary**

WSPA believes that all five refineries' Air Monitoring Plans (AMPs) for H<sub>2</sub>S should be evaluated against and approved pursuant to the District's Board-Approved Air Monitoring Guidelines for Petroleum Refineries.<sup>1</sup> With regard to the specifications that the District issued in October 2021,

- (1) The District did not provide the requisite opportunity for public comment—something which the District explicitly agreed to in a 2018 Settlement Agreement for the Regulation 12-15 rule, and which was subsequently incorporated into the December 19, 2018 rule revisions for Regulation 12-15; and
- (2) WSPA has not seen any evidence that the specification for an “accuracy of 2% of reading” across a “measurement range of 3 to 5000 ppb H<sub>2</sub>S” can be met by any open-path monitoring vendor's equipment.

In December 2022, staff issued revised specifications, however the District did not provide the requisite opportunity for public comment. These specifications were issued months after the May 2022 date that

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<sup>1</sup> BAAQMD, “Air Monitoring Guidelines for Petroleum Refineries”, April 2016.

staff had identified for refineries to purchase the monitors (and just days before its deadline for the monitors to be installed and operational).

While other specifications for monitoring devices that are based on extensive experience and testing, open-path fence line monitoring for H<sub>2</sub>S specifically is a research project, with essentially no publicly available data on which to gauge long-term performance. Given the lack of information regarding instrument long-term performance and durability, refineries should be encouraged to try out different types of monitoring equipment, rather than being required to choose one vendor's over another's, and data should be collected on monitor performance issues.

## Background

In 2018, the Bay Area refineries requested technical specifications from staff on the required open-path tunable diode laser (TDL) fenceline monitors (FLMs) for the detection of hydrogen sulfide (H<sub>2</sub>S) emissions. These specifications are necessary to select, purchase, install, and operate an open-path H<sub>2</sub>S technology as a component of their air monitoring plans (AMPs), pursuant to the requirements of BAAQMD Regulation 12-15. However, staff did not provide these specifications for several years, and the District issued a total of ten (10) extensions to the deadline for the refineries to select an open-path technology from December 2018 to June 2021.

On October 6<sup>th</sup>, 2021, the District issued letters to the refineries which identified specifications, stated that the final deadline for installation of an open path H<sub>2</sub>S monitoring systems would not be extended further, and set forth a schedule for the refineries to select, purchase, install, and operate open-path H<sub>2</sub>S technology. However, there was and is a critical issue with these specifications: although the District's letters identified that their specification was based on a "6-month proof of performance field study", our understanding is that neither monitor vendor had claimed to be able to meet the District's specification for "an accuracy of 2% of reading" across a "measurement range of 3 to 5000 ppb H<sub>2</sub>S" in an actual field installation.

The District's schedule included the following milestones:

BAAQMD Required Milestone Dates	Implementation Schedule
February 1, 2022	Select open-path monitoring system and provide specifications to Air District for approval.
May 1, 2022	Following Air District approval, purchase instrumentation and provide installation schedule/timelines to Air District.
June 1, 2022	Submit draft AMP revisions, incorporating H <sub>2</sub> S monitoring, to Air District for review and approval, including QAPP revisions incorporating key parameters bulletized above.
October 1, 2022	Complete installation and begin field validation of equipment, including quality and operational metrics identified in AMP and QAPP.
January 1, 2023	Commence operation and data reporting/posting to refinery fenceline monitoring website.

Monitor specifications were provided to the Air District for approval, but our understanding is that the District neither approved nor disapproved either of the candidate monitoring technologies. In spite of

this, the refineries made a good-faith effort to move forward and purchase systems per the District’s schedule in order to ensure that they were operational by the deadline.

On November 17, 2022, the District verbally identified that they might ask four of the five refineries to replace their existing H<sub>2</sub>S monitors with those from another vendor.

In December 2022, after the refineries had fully installed and were operating their FLMs, staff issued letters to the refineries containing revised specifications that open-path H<sub>2</sub>S instruments were required to meet. The letters were issued only days before the District’s January operational deadline for these instruments. The following table illustrates some of the key specification changes between October 2021 and December 2022.

Parameter	October2021	December 2022 <sup>1</sup>
Sensitivity	Confirmed <b>detection limits</b> which ranged from 3 to 25 ppb H <sub>2</sub> S, depending on environmental and operational conditions, with an average integrated path <b>detection limit</b> of 15 ppb H <sub>2</sub> S.	A <b>Limit of Quantitation (LOQ)</b> , which ranges from 3 to 25 ppb H <sub>2</sub> S, depending on environmental and operational conditions, with an average integrated path <b>LOQ</b> of 15 ppb H <sub>2</sub> S.
Accuracy	2% of reading.	15% of the reference standard, using a concentration of 40 to 60 ppb H <sub>2</sub> S equivalent integrated path average.
Repeatability	1% of reading.	15% using a concentration of 40 to 60 ppb H <sub>2</sub> S equivalent integrated path average.
Calibration	No specified concentration range.	<ul style="list-style-type: none"> <li>The low calibration point must be in the range of 40 to 60 ppb H<sub>2</sub>S equivalent integrated path average.</li> <li>The accuracy and precision specifications of 15% must be met at each calibration point.</li> </ul>
Bump Test	No specified concentration range.	The bump check concentration should be 50 to 100 ppb.

<sup>1</sup> In some cases the revised specification letter was issued by BAAQMD on 12/22/22, 10 days before the operational deadline of the equipment.

The November 2022 conversation and December 2022 letters led WSPA and its contractor to submit three California Public Records Act (PRA) requests in November 2022, January 2023, and March 2023 asking for the performance data used to support the specifications, questions regarding the details of the specification (definition of LOQ and details regarding the use of calibration cells), and documents and communications related to various aspects of the specifications. The District provided verbal responses to some of the questions regarding the use of calibration cells, responded to the request for a definition of LOQ with a qualitative definition rather than a quantitative one, stated that it would be responding to the March 2023 request for documents and communications, and did not respond to the request for the performance data.

Acting in good faith, the refineries implemented the fence line monitoring requirements as outlined in Regulation 12-15 and have been collecting data. WSPA believes the air monitoring plans (AMPs)

published by the refineries for public comment support sufficient performance to warrant approval by the BAAQMD.

We provide the additional Detailed Comments below supporting our request for FLM plan approvals by the BAAQMD.

### **Detailed Comments**

#### Staff Is Not Following Regulations/Process

Section 12-15-406 identifies that the District's air monitoring guidelines are supposed to "describe the factors that the District will apply in reviewing fence-line monitoring systems required under this rule" and that the guidelines "may include, but are not limited to, specifications for...instrumentation..." There is substantial effort and expense associated with selecting, integrating, and implementing the District's monitoring requirements.

Accordingly, with regard to WSPA's lawsuit against the District regarding Regulation 12-15, the Settlement Agreement language explicitly included language to allow for a 60-day comment period when the District changed their guidelines, and the rule language was changed in December 2018 accordingly. The District did not open a comment period with regard to either its October 6, 2021 letters or December 2022 letters.

Should the District decide to require the four refineries to replace already installed H<sub>2</sub>S monitors based on its interpretations of its October 2021 and December 2022 specifications, WSPA asserts that those specifications/interpretations were significant changes to the specifications that the staff should have followed the public comment process for as identified in Section 12-15-406 of Regulation 12-15, rather than mere "interpretations" of the existing guidelines (as they are described in [the District's public notices for the latest AMP revisions](#)) that warrant no such comments. In addition, if the District wishes to place that degree of weight on its October 2021 and December 2022 letters, Board approval is required to trigger the start of a year-long period that refineries have to submit updated plans, as identified in Section 12-15-403: "Within one year of approval by the District Board of Directors of updated air monitoring guidelines published by the APCO under Section 12-15-406, the refinery owner/operator shall submit to the APCO an updated site-specific air monitoring plan."

District staff also did not follow the process that they themselves identified in the October 6, 2021 letters: i.e., specifications were to be submitted "for District approval" before requiring equipment purchase. WSPA's understanding is that the District made no such approvals or disapprovals to any refineries for either vendor's equipment prior to the May 2022 purchase date.

#### New Specifications Issued After System Installations

Staff changed the specifications as identified in the District's October 6, 2021 letters and issued letters in December 2022 containing revised specifications. The revised specifications contained significant

changes, which included specifications to 15% accuracy and precision and a 40 to 60 ppb H<sub>2</sub>S equivalent integrated path average. These revised specifications were issued well after the instrument purchase deadline identified in the District's October 2021 letters and just days before the District's deadline for equipment operation.

In addition, there are several important technical details regarding the specifications which the District has not yet identified. The District's October 2021 and December 2022 letters refer to "*a standardized method, such as EPA Method TO-16, or a method developed by a credible standardization body, such as ASTM International or the International Organization for Standardization (ISO)*". We did not find any ISO standards specific to open-path monitors; however, TO-16 and ASTM documents for open-path monitoring identify considerable ambiguity:

- Section 9.8 of TO-16 is titled "The Determination of Accuracy". It identifies that "*This measurement is very difficult to make and no exact procedure has been accepted.*" Section 9.8.4 notes that "*...for the measurement of accuracy the concentration of the gas in the cell must be known. Obtaining this knowledge poses some special problems... Even if a cylinder is purchased, there is some difficulty with knowing what the concentration in the cell is, particularly for the polar compounds.*"

It then provides a procedure that is based in part on the judgment of the operator, and contains the caveat that "*The procedure described here has not been studied in depth, and little written material exists in the literature. Questions such as what the material of the lead lines are to be made of, whether the pressure must be measured in the cell, and whether the lines have to be heated have not been answered at this time. It is also not clear whether this procedure can be used with a mixture of gas or if only a single species must be used at a time. It seems possible that, in the future, a procedure using water in the atmosphere can be used for this measurement. Absorbance due to water is in every important part of the spectrum that is used with FT-IR measurements, and it will be in every spectrum. Water can also be measured independently with techniques other than the FT-IR so that a verification step can be performed. However, the use of water has not been explored at all.*"

- Section 13.4 of ASTM E1865-97, "Standard Guide for Open-Path FTIR Monitoring of Gases and Vapors in Air", states that "*The accuracy and precision of OP/FT-IR measurements are difficult to determine. Accuracy and precision can be estimated by using either ambient gas concentrations or a short cell containing a known amount of target gas....[13.4.2] [the latter] has the disadvantage of attenuating the IR beam due to the transmitting and reflecting properties of the windows used in the cell. The performance of the instrument is somewhat degraded and the intensity profile of the single-beam spectrum will be affected by the spectral characteristics of the cell.... The advantage of the short gas cell approach is that a known quantity of target gas is in the path. If this quantity is accurately known and is constant, accuracy and precision measurement can be made. Standard QA/QC techniques using a short cell are currently under development.*"

- Section 11.3.2 of ASTM E1982-98 (Reapproved 2021), “Standard Practice for Open-Path FTIR Monitoring of Gases and Vapors in Air”, notes that “*No standard procedures for using a short gas cell for accuracy and precision measurements have been developed to date.*”

Section 11.3.2.6 states that “*The QC measurements should be taken when the concentration of the target gas along the path is constant or near a minimum. Often, this condition will not be met during monitoring studies.*”

Section 11.3.2.8 states that for polar compounds such as H<sub>2</sub>S, “*special precautions are necessary when analyzing polar compounds with a gas cell. Some polar compounds may adhere to or react with the cell walls or the transfer tubing. When this is the case, the concentration of the target gas in the cell cannot be accurately determined. Therefore, proper passivation of the sampling apparatus and gas cell is necessary for the accurate sampling of polar compounds.*”

### Marketing Values vs. Specifications

The District’s October 6, 2021 letters outlined minimum acceptable standards for any open-path H<sub>2</sub>S monitoring system and included an accuracy of 2% of reading and repeatability of 1% of reading for a range of 3 to 5000 ppb based on a 6-month proof of performance field study. However, our understanding is that no instrument can reliably demonstrate compliance with both of those specifications under real-world fence line conditions.

Open-path monitoring for H<sub>2</sub>S at ppb levels in the ambient air is not a common practice anywhere in the world. WSPA believes that this novel technology was a key reason for the District issuing ten 3-month extensions to refineries’ H<sub>2</sub>S monitoring selection submittal deadlines before issuing its specifications on October 6, 2021.

Since there is not an established track record of reliability for field operations of this novel equipment or a history of its ability to perform over an extended number of years, the installation of different vendor systems should be encouraged to develop a body of knowledge regarding field usage of various units. It is unknown whether open-path H<sub>2</sub>S analyzers are capable of meeting the 15% accuracy and precision requirements as specified in the District’s December 2022 letters. Additional time will be needed to determine whether this is achievable in practice.

WSPA believes that the District’s 2021 specifications could not be demonstrated in the field because they were vendor “marketing” values that could be achieved only in ideal laboratory conditions. Marketing values often cannot be met in real-world application due to interferences from steam, fog, and other atmospheric interferants or operational factors such as the optical path-length. For detection limits specifically, a speaker at a recent October 2022 ASTM conference on the topic of detection limits described the differences as follows:

- “The Instrument Detection Limit (IDL) is the lowest concentration the instrument can distinguish analyte content from the background generated by the analytical matrix containing the analyte.

This is usually determined under perfect conditions by the manufacturer for use in advertising and promotion” (emphasis added);

- The Method Detection Limit (MDL) is the minimum concentration of an analyte that, in a given analytical matrix and analyzed according to a specific method, has a high probability of being identified, quantitatively measured, and reported to be at a greater than zero concentration” (emphasis added); and
- The MDL is much larger than the IDL.<sup>2</sup>

The District’s December 2022 letters replaced the “detection limit” specification with a “Limit of Quantitation (LOQ)” specification—identifying that they could be the same, but not providing a quantitative definition of the term.

### Data Completeness

Attachment 3 to the District’s December 2022 letters specifies a “Quarterly % Completeness” formula which does not account for planned nor unplanned maintenance activities. Under the District’s definition, all maintenance activities would count against the refineries’ quarterly completeness values. In addition, the Attachment 3 specifies 90% data completeness as a requirement for open-path H<sub>2</sub>S instruments. WSPA does not agree that maintenance activity periods should be recorded as incomplete data periods. WSPA believes it is premature to establish 90% data completeness as a requirement for open-path H<sub>2</sub>S instruments.

### What the Monitors Measure

WSPA recognizes the BAAQMD’s interest in concentrations measured in “ppb”, however these open-path monitors are measuring path-averaged concentrations in “ppm-meters.” This is the average ppm concentration across the optical pathlength which is twice the distance from the laser to the reflector. This presents an issue with the District’s instrument specifications that are in units of “path-average ppb”; specifically the ability of any equipment to meet path-integrated values necessarily depends on both the equipment and the pathlength, which is different for each monitor. The path-average ppb = ppm-meters divided by the optical pathlength (in meters) and multiplied by a conversion factor of (1000 ppb/ppm).

Put another way, the exact same instrument sharing two separate reflectors at different distances will necessarily provide different “path-average ppb” detection limit or LOQ values for the different paths. While this might lead to a conclusion that longer pathlengths are necessarily better because they result in lower path-average ppb, there are also tradeoffs to lengthening or shortening pathlengths.

---

<sup>2</sup> Kenn White, “Commonly Used Terms and Their Interrelationships”, presentation at the ASTM D22 Symposium on Detection Limits, 19 October 2022. Conference attendees (including at least one instrument manufacturer who spoke on a subsequent panel) expressed general agreement with these statements, without any dissent.

Mr. Joe Lapka  
April 20, 2023  
Page 8

These novel monitors employ a complicated and sophisticated type of the technology. All five refineries have conducted extensive trials to select the optimal monitoring system for their application, site topography, location of neighbors, safe operation and fence line system orientation.

WSPA appreciates the opportunity to provide comment on this important matter, and looks forward to Staff's response.

Sincerely,

A handwritten signature in black ink that reads "Kevin Buchan". The signature is written in a cursive style and is enclosed within a thin black rectangular border.

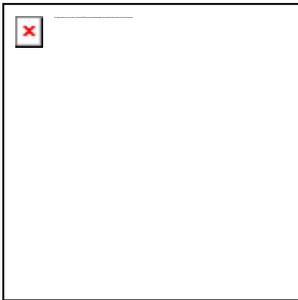
**Joseph Lapka**

---

**From:** jack.k@acr2solutions.com  
**Sent:** Thursday, April 20, 2023 4:20 PM  
**To:** Joseph Lapka  
**Cc:** kolkj@acr2solutions.com  
**Subject:** Comment on Revised Draft Refinery Fence line Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

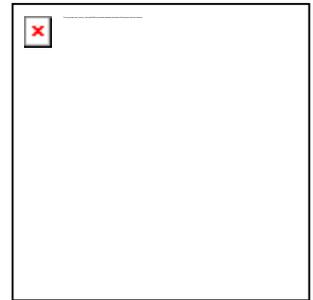
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**PROGRESSIVE DEMOCRATS  
OF BENICIA**

**ACTION ALERT**



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*This action alert comes from our friends at [BCAMP](#). Please take just 2 minutes to support this important request. Easy copy-and-paste friendly instructions follow.*

**We need the public to push the Air District to enforce its fence line regulations.**

**Valero is failing.**

**The Bay Area Air Quality Management District (BAAQMD) is requesting public input by Thursday, April 20 on the Air Monitoring Plans (AMPs) and Quality Assurance Project Plans (QAPPs) from the five Bay Area refineries. The public input relates to the measurement of the dangerous gas-hydrogen sulfide (H<sub>2</sub>S) by the refineries' open path fence line monitoring systems.**

The bottom line is this: since the law went into effect in January, four out of the five Bay Area refineries are not meeting BAAQMD's requirements for detecting and reporting the level of hydrogen sulfide at the refinery fence lines. One of the refineries, Martinez Refining Company, *is* meeting the requirements, so we know that the technology to provide the important data to the public is readily available.

## **We need to make sure that all five Bay Area Refineries, including Valero, are held accountable!**

This is not just about the refineries following rules set by the Air District, it's about public health. We need to know what is in the air we breathe! Your comments to the district make a tremendous difference. The Air Board does pay attention to the comments and the public sentiment. So please take a couple of minutes to send this email or one like it.

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

Jack Kolk, CISSP, CSSLP, InfraGard member  
President and CEO  
ACR 2 Solutions, Inc.  
Corporate office  
914 Camp Creek Drive  
Lilburn, GA 30047

Western Regional Office  
1660 Shirley Dr.  
Benicia, CA 94510

770.366.3913 Mobile

If we can't get to the phone...  
Please leave a voicemail and someone will get back to you!



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## Joseph Lapka

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**From:** Molly Lazarus [REDACTED]  
**Sent:** Thursday, April 20, 2023 3:53 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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Greetings,

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

Thank you,  
Molly Lazarus

## Joseph Lapka

---

**From:** Sam Reed [REDACTED]  
**Sent:** Thursday, April 20, 2023 3:26 PM  
**To:** Joseph Lapka  
**Subject:** PS re: fenceline monitoring comment

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

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I live in Sebastopol.

On 4/20/23, Sam Reed [REDACTED] wrote:

> Dear Mr. Lapka,

>

> I was concerned to learn that four out of five refineries are not  
> meeting BAAQMD's requirements. If the open path system being utilized  
> at the Martinez Refining Company does meet the requirements listed in  
> the Air District's 12/22/2022 letter, shouldn't the same system be  
> used at the other four refineries?

>

> Thank you for your efforts towards public safety and breathable air.

>

> Sincerely,

>

> Sam Reed

>

## Joseph Lapka

---

**From:** Stephen Golub [REDACTED]  
**Sent:** Thursday, April 20, 2023 2:10 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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Dear Mr. Lapka:

I hope that the BAAQMD will take action in favor of protecting our air quality in the Bay Area and conducting a public meeting, as detailed below.

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

Cheers,

Stephen Golub  
[REDACTED]  
Benicia, CA 94510

--

My blog: [A Promised Land: America as a Developing Country](#)

## Joseph Lapka

---

**From:** Carol Bray [REDACTED]  
**Sent:** Thursday, April 20, 2023 1:57 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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Dear Mr. Lapka-

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries do not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing. Recent news stories on the health impacts of polluted air should make this of utmost concern.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

Thank you for your attention to this critical public health issue.

Carol Bray

## Joseph Lapka

---

**From:** Sam Reed [REDACTED]  
**Sent:** Thursday, April 20, 2023 1:55 PM  
**To:** Joseph Lapka  
**Subject:** fenceline monitoring comment

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Dear Mr. Lapka,

I was concerned to learn that four out of five refineries are not meeting BAAQMD's requirements. If the open path system being utilized at the Martinez Refining Company does meet the requirements listed in the Air District's 12/22/2022 letter, shouldn't the same system be used at the other four refineries?

Thank you for your efforts towards public safety and breathable air.

Sincerely,

Sam Reed

## Joseph Lapka

---

**From:** Alysia Gadde [REDACTED] >  
**Sent:** Thursday, April 20, 2023 1:27 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

**There should also be a public meeting about this important topic.**

Thank you,  
Alysia Gadde  
Healthy Martinez: Refinery Accountability Group

## Joseph Lapka

---

**From:** Kevin Buchan <kbuchan@wspa.org>  
**Sent:** Thursday, April 20, 2023 1:25 PM  
**To:** Joseph Lapka  
**Subject:** WSPA cmts, Reg. 12-15 Air Monitoring Plans  
**Attachments:** Fence Line Monitors, final WSPA H2S AMP comments, 04-20-2023.pdf

You don't often get email from kbuchan@wspa.org. [Learn why this is important](#)

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Mr. Lapka,  
Attached are the WSPA comments pertaining to all five Bay Area refinery fence line air monitoring plans under Regulation 12-15.

If you could reply confirming receipt of our comments, that would welcome.

Thanks.

Kevin Buchan  
SENIOR MANAGER  
BAY AREA REGULATORY AFFAIRS

### New Address

 WSPA  
5100-B1 Clayton Road  
Suite 402  
Concord, CA 94521-3165  
[Kbuchan@wspa.org](mailto:Kbuchan@wspa.org)

## Joseph Lapka

---

**From:** Katie Morgan Booth [REDACTED]  
**Sent:** Thursday, April 20, 2023 11:56 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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Hello,

I am a mother of two young children who live in close proximity to a refinery, yes we chose to live here knowing that we were neighbors- that is a choice we made. However we believe that as neighbors they should be held to the standard which protects us all- especially our youngest and most vulnerable populations.

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

Thank you for the consideration,

Katie Booth

Benicia, CA

## Joseph Lapka

---

**From:** Todd [REDACTED] >  
**Sent:** Thursday, April 20, 2023 6:47 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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As a stakeholder, I demand that the Air District enforce Fenceline Monitoring Regulations as required by Rule 12-15. The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

## Joseph Lapka

---

**From:** Ottinger,Gwen <geo29@drexel.edu>  
**Sent:** Thursday, April 20, 2023 2:19 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro, Chevron, and Martinez Refining Corporation  
**Attachments:** Ottinger Comment on AMPs.pdf

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Dear Joe,

Please find attached my comment on the refinery air monitoring plans.  
Best wishes,

Gwen

[Gwen Ottinger](#)

Associate Professor, Politics and STS, [Drexel University](#)

[ottinger@drexel.edu](mailto:ottinger@drexel.edu)

[www.fairtechcollective.org](http://www.fairtechcollective.org)

## Joseph Lapka

---

**From:** Anna Henry [REDACTED] >  
**Sent:** Wednesday, April 19, 2023 7:16 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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Greetings,

I'm writing to provide public comment on Rule 12-15. The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements, with only the open path system being utilized at the Martinez Refining Company meeting the requirements and the systems being used at the other four refineries not meeting these requirements.

Community members deserve consistent and uniform data so we can understand the quality of the air that we and our families are breathing. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. Our health depends on it.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

Thank you for considering this comment.

Sincerely,  
Anna Henry

## Joseph Lapka

---

**From:** Valerie Ventre-Hutton [REDACTED]  
**Sent:** Wednesday, April 19, 2023 5:03 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro, and Chevron

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Joe Lapka  
BAAQMD  
375 Beale Street, Suite 600  
San Francisco, CA 94105

RE: Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro, and Chevron

Dear Mr. Lapka,

Only one of the five San Francisco Bay area refineries, Martinez Refining Company, has met the minimum requirement for compliance with BAAQMD's Rule 12-15. The remaining four, Valero, Phillips 66, Tesoro, and Chevron have not. This is completely unacceptable and puts our communities at significant risk.

Based on the data the open path system, used at the Martinez Refining Company, appears to be the only one that meets the requirements outlined in the Air District's 12/22/22 letter as defined by the requirements in their Quality Assurance Project Plan. Systems used by the other refineries clearly do not comply.

- *All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters.*
- *All technologies across all Bay Area refineries should have similar operational and data display parameters.*

Standardization of equipment, methodologies, and protocols allows communities to compare measurements and performance across refineries, more quickly identify problems and, most importantly, actually resolve those problems. This is critical for public health and public safety and will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

Sincerely,  
Valerie Ventre-Hutton,  
Climate Policy Team Lead



## Joseph Lapka

---

**From:** Gail Walden [REDACTED]  
**Sent:** Wednesday, April 19, 2023 3:19 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fence line Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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What is the point of having regulations if they are not enforced? Fines are insufficient if they are not large enough to motivate compliance.

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries.

Furthermore, all technologies used at all Bay Area refineries should develop similar operational and data display parameters now. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines, but by installing the equipment that will meet the Air District's requirements without delay.

Your role is to protect and promote public health and safety! Please see that these refineries come into compliance.

Respectfully,

*Gail Walden*

Enjoy today! - every day., with clean air to breathe.

## Joseph Lapka

---

**From:** Alan Jackman [REDACTED]  
**Sent:** Wednesday, April 19, 2023 2:57 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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It is well known that refineries pose health risks to surrounding communities. The requirements of Rule 12-15 are an important tool to protect those communities. Hold these refineries accountable. Enforce the rule.

Alan Jackman  
Davis, CA

## Joseph Lapka

---

**From:** Kathleen Carey [REDACTED] >  
**Sent:** Wednesday, April 19, 2023 2:39 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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Dear Bay Area Air Quality District,

I am writing to express my deep concern regarding the revised refinery air monitoring plans, which show that four out of five refineries are not meeting the requirements set by the BAAQMD. As you are aware, only the open path system being utilized at the Martinez Refining Company meets the requirements outlined in the Air District's 12/22/2022 letter, as defined by the Quality Assurance Project Plan (QAPP). This indicates a serious issue with the monitoring equipment being used at the other four refineries.

It is essential that all refineries utilize equipment that meets the Air District requirements, as stated in the 12/22/2022 letters. Moreover, all requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This is not simply about following the rules, it is about safeguarding public health and safety. The public deserves to know what they are breathing.

In light of this, I request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. I strongly believe that this step will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15. Therefore, I urge the District to hold a public meeting on this important topic, so that community members can voice their concerns and receive updates on progress being made.

It is vital that the refineries be held accountable, not just by paying fines, but by installing the equipment that will meet the Air District's requirements without delay. The safety of our communities is at stake, and we must ensure that all refineries operate in a manner that does not jeopardize public health.

Thank you for your attention to this matter. I look forward to effective solutions that will benefit the community as a whole.

Sincerely,

Kathleen Carey  
Benicia, CA

## Joseph Lapka

---

**From:** Bodil Fox [REDACTED]  
**Sent:** Wednesday, April 19, 2023 2:05 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fence-line Air Monitoring Plans for four refineries

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Dear Bay Area Air Quality District,

I am writing to express my concern about the recent revision of refinery air monitoring plans, which shows that four out of five refineries are not meeting the requirements set by the BAAQMD. Only the open path system being used at the Martinez Refining Company meets the requirements outlined in the Air District's 12/22/2022 letter, as defined by the Quality Assurance Project Plan (QAPP).

I believe that it is essential for all refineries to use equipment that meets the Air District requirements, as stated in the 12/22/2022 letters. Furthermore, it is important to establish uniform requirements across all Bay Area refineries to enable communities to compare measurements and performance. This is crucial for public health and safety, and we deserve to know what we are breathing.

In addition, I request that all technologies used at all Bay Area refineries have similar operational and data display parameters. I believe this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

Therefore, I urge the District to hold a public meeting on this important topic, so that community members can voice their concerns and receive updates on progress being made. It is vital that the refineries be held accountable, not just by paying fines, but by installing the equipment that will meet the Air District's requirements without delay.

Thank you for your attention to this matter. I look forward to working with the District to develop effective solutions that will benefit the community as a whole.

Sincerely,

Bodil Fox

[REDACTED]

Benicia, CA 94510

## Joseph Lapka

---

**From:** Larnie Fox [REDACTED]  
**Sent:** Wednesday, April 19, 2023 2:00 PM  
**To:** Joseph Lapka  
**Subject:** Regarding the Revised Draft Refinery Fenceline Air Monitoring Plans for Phillips 66, Tesoro, Chevron and Valero

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Dear Bay Area Air Quality District,

I am writing to express my deep concern regarding the revised refinery air monitoring plans, which show that four out of five refineries are not meeting the requirements set by the BAAQMD. As you are aware, only the open path system being utilized at the Martinez Refining Company meets the requirements outlined in the Air District's 12/22/2022 letter, as defined by the Quality Assurance Project Plan (QAPP). This indicates a serious issue with the monitoring equipment being used at the other four refineries.

It is essential that all refineries utilize equipment that meets the Air District requirements, as stated in the 12/22/2022 letters. Moreover, all requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This is not simply about following the rules, it is about safeguarding public health and safety. The public deserves to know what they are breathing.

In light of this, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We strongly believe that this step will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15. Therefore, we urge the District to hold a public meeting on this important topic, so that community members can voice their concerns and receive updates on progress being made.

It is vital that the refineries be held accountable, not just by paying fines, but by installing the equipment that will meet the Air District's requirements without delay. The safety of our communities is at stake, and we must ensure that all refineries operate in a manner that does not jeopardize public health.

Thank you for your attention to this matter. We look forward to working with the District to develop effective solutions that will benefit the community as a whole.

Sincerely,

Larnie Fox

projects

[Choice](#)

- [Chance](#)

Bodil/Larnie  
Recent Works

Works  
in Progress

## Joseph Lapka

---

**From:** Gary Farber [REDACTED] >  
**Sent:** Wednesday, April 19, 2023 12:21 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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I understand that four out of five refineries are not meeting BAAQMD's requirements, according to the revised refinery air monitoring plans! This is not acceptable. Evidently, only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letter. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

Thanks in advance for your consideration.

Gary Farber  
Walnut Creek

## Joseph Lapka

---

**From:** Charesa Harper [REDACTED] >  
**Sent:** Wednesday, April 19, 2023 12:10 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

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*The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*

## Joseph Lapka

---

**From:** Diana <nicca@igc.org>  
**Sent:** Wednesday, April 19, 2023 10:17 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

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The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines, but by installing the equipment that will meet the Air District's requirements without delay.

Sincerely,  
Diana Bohn  
Berkeley

## Joseph Lapka

---

**From:** Robert Nickeson [REDACTED]  
**Sent:** Wednesday, April 19, 2023 10:13 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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It is very disappointing to hear that only one of the Bay Area refineries are complying with the agency's current air monitoring requirements. But it is clear that there is no good reason why the other four (including our local plant, operated by Valero) cannot match the compliance guidelines, as the Martinez plant has accomplished. Hopefully the District will do it's duty and ensure that it's regulations are recognized and requirements are met in a timely manner, or serious financial and operational consequences are justified.

Bob Nickeson  
Benicia, CA

## Joseph Lapka

---

**From:** A.L. Steiner [REDACTED]  
**Sent:** Wednesday, April 19, 2023 9:54 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To Whom It May Concern:

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

Best, A.L. Steiner

## Joseph Lapka

---

**From:** Donna Davies [REDACTED]  
**Sent:** Wednesday, April 19, 2023 9:34 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

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Hello,

Four out of five refineries are not meeting the necessary requirements. All refineries should make use of the equipment that meets all the Air District requirements. It is important for public health and safety. All Bay Area refineries should have similar operational and data display parameters in order to establish community trust in the data generated.

Sincerely,  
Donna Davies

## Joseph Lapka

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**From:** Jean Jackman [REDACTED] >  
**Sent:** Wednesday, April 19, 2023 9:26 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

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I understand that four out of five refineries are not meeting BAAQMD's requirements. Martinez is able to do that with their open path system. The other companies must be held accountable and shut down if they are not using the system to meet requirements. Our public health is continually at risk. I am fortunate to have good health care and yet I have breathing problems. My grandchildren in the bay area all have had breathing problems. Two had serious hospitalized breathing problems. These refineries can afford it and must be good neighbors. They are causing harm to save money. PLEASE insist that they all use the correct technologies immediately.

Jean Jackman

[REDACTED]

Davis, CA 95616

## Joseph Lapka

---

**From:** Steve Masover [REDACTED]  
**Sent:** Wednesday, April 19, 2023 7:59 AM  
**To:** Joseph Lapka  
**Subject:** BAAQMD Rule 12-15 Compliance

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I am aware that four of five Bay Area refineries are not in compliance with BAAQMD's revised refinery air monitoring plan requirements -- only the system currently utilized at the Martinez Refining Company meets requirements set out in the 12/22/2022 letter defining the district's Quality Assurance Project Plan requirements (Rule 12-15).

Every refinery needs to use equipment that meets the 12/22/2022 requirements. Operation and implementation, as well as data reporting, needs to be as close to the same across all Bay Area refineries as is possible -- in order for communities to understand and compare data across refineries.

This is a public health and safety issue. It is not a purposeless bureaucratic compliance exercise. People in the Bay Area need to know what contaminants are in our shared atmosphere, the air we depend on to live.

Steve Masover  
Berkeley CA

## Joseph Lapka

---

**From:** Kristin Reed [REDACTED]  
**Sent:** Wednesday, April 19, 2023 7:47 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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I understand that four out of five refineries are not meeting BAAQMD's requirements. Only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems in place at the other four refineries do not meet the requirements.

I'm calling on you to ensure that ALL refineries utilize equipment that meets the Air District requirements stated in the 12/22/2022 letters. Requirements across all Bay Area refineries should be as uniform as possible in operation and data display for communities to compare measurements and performance across refineries. Bay Area refineries should have similar operational and data display parameters developed and required.

Please support public health and safety! Bay Area communities deserve to know what's in the air we are breathing. Right now we can't trust them. We call on you to help regain that trust that our government is regulating refineries adequately.

Thank you for hearing my concerns.

With best regards,

Kristin Reed

[REDACTED]

San Francisco, CA 94121

## Joseph Lapka

---

**From:** Michael W Evans [REDACTED]  
**Sent:** Wednesday, April 19, 2023 6:15 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

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*The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*

*Thank you,*

*Michael W Evans*

## Joseph Lapka

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**From:** robert raven [REDACTED]  
**Sent:** Wednesday, April 19, 2023 12:33 AM  
**To:** Joseph Lapka  
**Subject:** protect our communities

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Please protect our communities from refineries!  
Thanks!

## Joseph Lapka

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**From:** d B [REDACTED] >  
**Sent:** Tuesday, April 18, 2023 10:45 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

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The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

Thank you,  
David Baca

## Joseph Lapka

---

**From:** Martin Marcus [REDACTED]  
**Sent:** Tuesday, April 18, 2023 10:41 PM  
**To:** Joseph Lapka  
**Subject:** "Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron."

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*The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*

## Joseph Lapka

---

**From:** Wendy Stock [REDACTED] >  
**Sent:** Tuesday, April 18, 2023 10:12 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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To whom it may concern:

*The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*

Sincerely,

Wendy Stock

[REDACTED]

Berkeley CA 94708

## Joseph Lapka

---

**From:** Blaine Burgstrom [REDACTED]  
**Sent:** Tuesday, April 18, 2023 9:50 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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Please work to put some teeth into the system to force these, and other, bad actors into compliance with clean air standards.

These Companies are like kids; they will try and get away with as much as possible until the punishment is enough of a deterrent or, they grow up and start acting responsible.

They always complain about regulation but their continued disregard for their neighbors and the environment demand regulation.

Like any effective deterrent the consequences have to be distasteful enough to prevent the action.

Please work at making that happen.

Thank you

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

Blaine Burgstrom

## Joseph Lapka

---

**From:** Jessica Sorrels [REDACTED]  
**Sent:** Tuesday, April 18, 2023 9:18 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

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To whom it may concern,

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. Only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the conditions in their Quality Assurance Project Plan. The systems used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules; it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies used as part of Rule 12-15.

Best,  
Jessica Sorrels

## Joseph Lapka

---

**From:** Virginia Morris <[REDACTED]>  
**Sent:** Tuesday, April 18, 2023 9:00 PM  
**To:** Joseph Lapka  
**Subject:** Vital we measure emissions from fossil fuel companies

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to protect all of us. We are all in this together.

Thank you,  
Virginia Morris  
Oakland  
[REDACTED]

Sent from my iPhone

## Joseph Lapka

---

**From:** Ann Dorsey [REDACTED]  
**Sent:** Tuesday, April 18, 2023 9:00 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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Bay Area Air Quality Management District,

It is imperative that refineries meet the requirements listed in the Air District's 12/22/2022 letter, as defined in their Quality Assurance Project Plan. Currently, four out of five refineries are not meeting BAAQMD's requirements. I urge you to ensure that all refineries use equipment that meets those requirements, that there be uniformity in operation and data display so measurements and performance can be compared. Communities need to be informed about the air they are breathing.

Thank you,

Ann Dorsey

## Joseph Lapka

---

**From:** Tom Carlino [REDACTED]  
**Sent:** Tuesday, April 18, 2023 8:32 PM  
**To:** Joseph Lapka  
**Subject:** Rule 12-15

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The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. Only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be uniform in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety. We deserve to know what we are breathing.

All technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon.

This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

## Joseph Lapka

---

**From:** John Teevan [REDACTED]  
**Sent:** Tuesday, April 18, 2023 8:22 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is clear that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/22 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/22 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This is not just about following the rules, it is about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

Thank you for considering my comments.

Sincerely,

Mr & Mrs John P Teevan III

--

John P Teevan III

[REDACTED]  
Chula Vista, CA 91914 USA

## Joseph Lapka

---

**From:** Madeline Koster [REDACTED]  
**Sent:** Tuesday, April 18, 2023 7:55 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

## Joseph Lapka

---

**From:** Mical Kiflu [REDACTED]  
**Sent:** Tuesday, April 18, 2023 6:54 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

I am deeply concerned for the public health of the residents of Martinez and surrounding areas. The revised refinery air monitoring plans shows that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

This isn't just about following the rules, it's about public health and safety! Look at the alarming rates of asthma and cancer in kids and sensitive groups! Everyone should have access to clean air! Everyone deserves to breathe healthy.

Best,

Mical Woldemichael

## Joseph Lapka

---

**From:** Michelle Klimek [REDACTED]  
**Sent:** Tuesday, April 18, 2023 5:56 PM  
**To:** Joseph Lapka  
**Subject:** Refinery emissions are killing us!

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I just read the article in the North Bay Journal and am infuriated. All the Bay area refineries are polluting our air with toxic gases and we allow them to stay in business. This is just so upsetting. Please close all the refineries until they pass quality control. The fines aren't enough, they are a joke. It is your job to keep us safe.

## Joseph Lapka

---

**From:** Marjory Keenan [REDACTED]  
**Sent:** Tuesday, April 18, 2023 5:51 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

It is vital that the refineries be held accountable—not just by paying fines, but by installing the equipment that will meet the Air District's requirements without delay. The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

Thank you for your consideration of my comment.

Marjory Keenan

## Joseph Lapka

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**From:** Bonnie Margay Burke [REDACTED]  
**Sent:** Tuesday, April 18, 2023 5:50 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

We are counting on you to do the right thing,

Bonnie M. Burke

## Joseph Lapka

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**From:** Andy Baldovino [REDACTED]  
**Sent:** Tuesday, April 18, 2023 5:47 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro, and Chevron

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

CAUTION: This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

The revised refinery air monitoring plans show that four out of five refineries are not in compliance with BAAQMD's Rule 12-15. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12-22-2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12-22-2022 letter. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This is not just about following the rules, it is for improving public health and safety. We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

Thank you.

## Joseph Lapka

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**From:** Ellen Beans [REDACTED] >  
**Sent:** Tuesday, April 18, 2023 5:25 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

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**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To the Bay Area Air Quality District:

I have just learned that the revised refinery air monitoring plans show that only one refinery out of five in our district is meeting the requirement listed in the Air Quality's December 22, '22 letter! This is NOT acceptable. If one refinery can do it, then all the rest should as well. I urge the Air Quality Board to see to it that ALL refineries be held accountable, and not just by paying fines, but by installing the equipment WITHOUT ANY MORE DELAY!

Thank you for taking strong action in this matter. So many lives depend on your action.

*Ellen Beans*

Ellen Beans

[REDACTED] Moraga, CA

## Joseph Lapka

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**From:** Beth Darlington [REDACTED]  
**Sent:** Tuesday, April 18, 2023 5:14 PM  
**To:** Joseph Lapka  
**Subject:** refineries

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**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

*The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*

## Joseph Lapka

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**From:** Kevin Slauson [REDACTED]  
**Sent:** Tuesday, April 18, 2023 4:58 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro, and Chevron

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

*The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15. Thank you for your consideration.*

Kevin Slauson

## Joseph Lapka

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**From:** Claire Broome [REDACTED]  
**Sent:** Tuesday, April 18, 2023 4:11 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To: BAAQMD board members and BAAQMD staff

As a public health professional, I know that what gets measured gets done, especially if the measurements are relevant to health concerns, in standard consistent format, and publicly available. Local residents whose health may be affected by releases of toxic substances from refineries deserve to have accurate information about such releases. BAAQMD has responsibility to ensure that refineries in their jurisdiction meet the objectives of Rule 12-15.

The Martinez Refining Company is meeting the requirements listed in your December 22, 2022 letter, documenting that compliance is feasible. The other four refineries are not meeting these requirements, and compliance is overdue. Fines have not been sufficient; it is time for effective enforcement. In addition to monitoring, the results of fenceline monitoring need to be made readily available to the public.

Claire Broome, MD

Assistant Surgeon General, US Public Health Service (retired)

[REDACTED]  
Berkeley CA 94708

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[REDACTED]  
Berkeley, CA 94708

## Joseph Lapka

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**From:** Ziv Tzvieli [REDACTED]  
**Sent:** Tuesday, April 18, 2023 3:45 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

I am writing to comment on the revised draft Refinery Fenceline Air Monitoring plans. The revised refinery air monitoring plans show that 4 out of 5 refineries are not meeting BAAQMD's requirements. It seems clear that only the open path system now being utilized at the Martinez Refining Company meets the requirements listed in the 12/22/2022 letter from the Air District, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries are not up to these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. My neighbors and I deserve to know what we are breathing.

Additionally, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This is the only way to help re-establish trust in the data generated by the technologies in use as part of Rule 12-15.

Sincerely,

Ziv Tzvieli  
Berkeley, CA

## Joseph Lapka

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**From:** Christopher Dawe [REDACTED]  
**Sent:** Tuesday, April 18, 2023 3:18 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

[REDACTED]  
Christopher Dawe  
San Francisco

## Joseph Lapka

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**From:** David Bezanson <[REDACTED]>  
**Sent:** Tuesday, April 18, 2023 3:11 PM  
**To:** Joseph Lapka  
**Subject:** Rule 12 - 15

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi BAAQMD Board,

Please implement the rule in the most stringent manner in order to improve air quality surrounding the refineries.

This will benefit workers as well as residents. The rule should apply equally to emissions from petroleum-based as well

as biomass/fuel-based feedstocks. Toxic air contaminants from both include NOx, hydrogen sulfide, PM, CO, and benzene. There is no level of exposure without harm.

Smokestack carbon capture has not been proven effective. That is, no research has shown that CCS captures more CO2 than is emitted from 3-Scope lifecycle operations (upstream and downstream) of building and powering the CCS equipment. Do not permit refineries to meet their obligations to decrease GHGs by using CCS. Instead, require direct emissions reduction.

Require refineries to install the most effective scrubbers, to pay all costs of installation, and to maintain the scrubbers at their expense.

Polluter pays.

Thank you for improving our air quality,

David Bezanson, Ph.D.  
Bay Area resident and CA voter

## Joseph Lapka

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**From:** LD Chen [REDACTED]  
**Sent:** Tuesday, April 18, 2023 2:49 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

I hope as our public representative, you will work to enforce Rule 12-15 to protect the health of our communities.

Finally, the District should hold a public meeting on this important topic. It is vital that the refineries be held accountable—not just by paying fines, but by installing the equipment that will meet the Air District's requirements without delay.

Thank you for your service to protect the safety of our communities.

Concerned Citizen/Physician,

Lilly Chen MD

## Joseph Lapka

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**From:** Lawrence Deng [REDACTED]  
**Sent:** Tuesday, April 18, 2023 3:06 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear to whom it may concern,

I am writing this email informing you to enforce fenceline monitoring regulations with reasons.

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines, but by installing the equipment that will meet the Air District's requirements without delay. Thank you and have a nice day.

Lawrence

## Joseph Lapka

---

**From:** James Eggers [REDACTED]  
**Sent:** Tuesday, April 18, 2023 2:54 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Senior Air Quality Specialist Lapka,

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable, not just by paying fines, but by installing the equipment that will meet the Air District's requirements without delay.

Thank you for your attention to this matter which is vital to the health of local communities,

James Eggers,

San Jose

## Joseph Lapka

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**From:** Laura Bernstein [REDACTED]  
**Sent:** Tuesday, April 18, 2023 2:50 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Plans--Valero, Phillips 66, Tesoro and Chevron

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*The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*

*Sincerely,*

*Laura Bernstein,*

*Alameda, CA 94501*

## Joseph Lapka

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**From:** Dorothy McQuown [REDACTED]  
**Sent:** Tuesday, April 18, 2023 2:26 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Air District Board Members:

*I am writing to express my distress that revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

*It is essential that all refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*

*Yours truly, Dorothy McQuown, Ph.D., Mill Valley, CA 94941*

Sent from my iPad

## Joseph Lapka

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**From:** Jordan Briskin [REDACTED]  
**Sent:** Tuesday, April 18, 2023 2:17 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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To Whom it May Concern,

The revised refinery air monitoring plans show that 4 out of 5 refineries do not meet BAAQMD's requirements. It is abundantly clear that only the open path system used at the Martinez Refining Company meets the requirements outlined in the Air District's letter (dated to December 22, 2022), as defined by the requirements in their Quality Assurance Project Plan. The other 4 refineries' systems do not meet these requirements.

All refineries must utilize equipment that meets the Air District requirements as stated in the aforementioned letters. All requirements across all Bay Area refineries must be as uniform as possible in operation and data display to enable communities to compare measurements and performance between all refineries. This is not only about following the rules -- it is also about public health and safety. We deserve to know what we are breathing.

Furthermore, all technologies used by Bay Area refineries need to have similar operational and data display parameters developed and required as soon as possible. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

## Joseph Lapka

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**From:** Michelle Puckett [REDACTED]  
**Sent:** Tuesday, April 18, 2023 2:11 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Greetings,

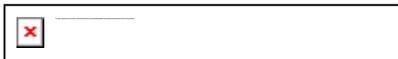
The revised refinery air monitoring plans show that 4/5 of refineries are not meeting BAAQMD's requirements. Only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The other four refineries do not meet these requirements.

All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow people to compare measurements and performance across refineries. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

This is about public health and safety! We have a right to know what we are breathing.

Sincerely,  
Michelle Puckett  
Richmond, CA 94801

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[www.michellepuckett.com](http://www.michellepuckett.com)

## Joseph Lapka

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**From:** Judith Howell [REDACTED]  
**Sent:** Tuesday, April 18, 2023 1:57 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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The requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan must be enforced to ensure public health and safety. All oil refineries must be held accountable.

Thank you,

Judith Howell

[REDACTED]  
Oakland CA 94610

## Joseph Lapka

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**From:** Jennifer Valentine [REDACTED]  
**Sent:** Tuesday, April 18, 2023 1:00 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

CAUTION: This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines, but by installing the equipment that will meet the Air District's requirements without delay.

Thank you - jennifer valentine

## Joseph Lapka

---

**From:** [REDACTED]  
**Sent:** Tuesday, April 18, 2023 12:48 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

**Importance:** High

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

4 of 5 Bay area refineries are still not complying with the District's requirements for fence line sampling/monitoring. Aside from MRC's system, the technology at the other 4 does not meet current requirements.

We have seen over and over the results of trusting these corporations to provide timely, honest, and public-safety-first reporting and monitoring. The TG 2022 release was only the most recent example of that – the truth not out for months.

We deserve to know what we are breathing, and what's being uptaken into our garden fruits and vegetables. Rule 12-15 was enacted in 2016. They have had plenty of time to get this done. With gas prices in California hugely higher than elsewhere in the nation, there's plenty of profit margin being reaped to cover capex and opex costs of these required public safety measures.

Why are the refineries not being held accountable – both for mandated fines, but also for getting their acts together and installing the required technology without further delay – equipment which is demonstrably working at MRC?

**Ben Stiegler**

[REDACTED] | [REDACTED]

## Joseph Lapka

---

**From:** Susan Walp [REDACTED]  
**Sent:** Tuesday, April 18, 2023 12:28 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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Hi.

*The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*

The bay area's air must be pure and healthy once more. (I once lived there, and it was wonderful.

Susan P. Walp  
91103

## Joseph Lapka

---

**From:** Shoshana Wechsler [REDACTED]  
**Sent:** Tuesday, April 18, 2023 12:21 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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CAUTION: This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear BAAQMD Staff:

I have learned from my friends at the Benicia Community Air Monitoring Program that four out of five Bay Area refineries—Valero, Phillips 66, Tesoro and Chevron—are not meeting the air monitoring requirements established by BAAQMD's Rule 12-15 for detecting and reporting hydrogen sulfide levels at their fencelines. The one compliant refinery is, ironically enough, the Martinez Refining Company/PBF, which is a notorious scofflaw when it comes to compliance with BAAQMD's particulate matter standards. But I digress....

It is absolutely crucial that our refineries be held accountable, and not merely by paying affordable fines that become part of their costs of doing business. What we really need is compliance via the installation of equipment that meets Air District requirements. With good monitors, releases of toxic gases, including hydrogen sulfide, can be detected early enough to enable the implementation of community safety measures and timely equipment repairs.

All refineries should be using equipment that meets the Air District requirements, as stated in the December 12, 2022 letters. (The open path system used by MRC meets those requirements, and could be more widely adopted.) Requirements across all Bay Area refineries should be as uniform as possible in operation and data display, so that communities are able to compare measurements and performance. Without this uniformity, there will be little community trust in any of the data collected.

Refinery communities more than deserve rigorous implementation of fenceline air monitoring requirements.

Sincerely yours,

Shoshana Wechsler  
West Contra Costa

## Joseph Lapka

---

**From:** Tim Laidman [REDACTED]  
**Sent:** Tuesday, April 18, 2023 11:57 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

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Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

*The draft revised refinery air monitoring plans indicate that four of the five refineries included are not meeting BAAQMD's requirements. Only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan.*

*The systems being used at the other four refineries do not meet these requirements. This must be fully addressed by BAAQMD as soon as possible for the health of nearby communities.*

*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*

It is vital that the refineries be held accountable—not just by paying fines, but by installing the equipment that will meet the Air District's requirements without delay.

I was in attendance and spoke when Rule 12-15 was passed in 2016 to require oil refineries to monitor and report fugitive gas emissions from their operating equipment, such as storage tanks, valves, and compressors. As a nearby resident and a retired engineer, I am concerned that these emissions seriously impact the health of surrounding communities. I have two diagnosed cancers and had a heart attack in 2020, even though I am in good physical condition, followed a vegan diet for many years and have no family history of cardiac disease. The toxic gases released include noxious chemicals like the cancer-causing benzene, and other serious gases like hydrogen sulfide (H<sub>2</sub>S). These can mix with PM 2.5 from other cumulative sources to create a toxic mix which negatively affects the quality of the air inhaled in frontline communities.

With good monitors, releases can be detected and sources fixed, lowering the risk to surrounding communities. This is an extremely important public health issue and full compliance saves lives and reduces negative health impacts such as I have experienced.

Thank you for your full attention to this matter and improving health outcomes for Bay Area residents.

Tim Laidman  
El Cerrito, CA  
Sent from my iPhone

## Joseph Lapka

---

**From:** joyce banzhaf [REDACTED]  
**Sent:** Tuesday, April 18, 2023 11:31 AM  
**To:** Joseph Lapka  
**Subject:** Rule 12-15

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It is imperative the proper monitoring equipment and strict enforcement is done regarding this dangerous gas. Joyce Banzhaf,

## Joseph Lapka

---

**From:** dave doering [REDACTED]  
**Sent:** Tuesday, April 18, 2023 11:23 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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*The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*

*David Doering*

## Joseph Lapka

---

**From:** Steve Bloom <sbloom@pixar.com>  
**Sent:** Tuesday, April 18, 2023 11:11 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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Four out of five Bat Area refineries are not meeting BAAQMD's requirements, according to the revised refinery air monitoring plans. Only the open path system used at the Martinez Refining Co. meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we're breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

Thank you,

Steve Bloom  
San Francisco

## Joseph Lapka

---

**From:** Franziska Raedeker [REDACTED]  
**Sent:** Tuesday, April 18, 2023 11:06 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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Dear BAAQMD,

The revised refinery air monitoring plans show that **four out of five refineries are not meeting BAAQMD's requirements**. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. **This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.**

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

**It is vital that the refineries be held accountable—not just by paying fines, but by installing the equipment that will meet the Air District's requirements without delay.**

Sincerely,

F. Raedeker, breathing Bay Area citizen

## Joseph Lapka

---

**From:** jessea greenman [REDACTED]  
**Sent:** Tuesday, April 18, 2023 11:00 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

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*Four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing. Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*

**+++ Jessea NR Greenman, Oakland CA +++**

## Joseph Lapka

---

**From:** Nina Lyons [REDACTED]  
**Sent:** Tuesday, April 18, 2023 10:56 AM  
**To:** Joseph Lapka  
**Subject:** comment on revised draft refinery monitoring

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This comment includes the revised draft refinery fenceline air monitoring plans for Valero, Phillips 66, tesoro and Chevron. Four out of Five do not meet BAAQMD requirements and all must be held accountable. These companies are destroying our air quality and the health of the entire bay area. Climate change is happening now and our government must regulate these industries!!!

Thank you,

Nina

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Nina Lyons | Fine Arts

commissions, private collections, public exhibitions

[www.ninalyons.com](http://www.ninalyons.com)

## Joseph Lapka

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**From:** Justin Truong [REDACTED]  
**Sent:** Tuesday, April 18, 2023 10:49 AM  
**To:** Joseph Lapka  
**Subject:** "Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron."

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*The revised refinery air monitoring plans show that four out of five refineries not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other refineries do not meet these requirements.*

*All refineries should utilize equipment that meets the Air District requirements stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have standard operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*



ReplyForward

**Compose:**  
**"Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron."**



[ilapka@baaqmd.gov](mailto:ilapka@baaqmd.gov)

[ ]

## Joseph Lapka

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**From:** Frances Aubrey [REDACTED]  
**Sent:** Tuesday, April 18, 2023 10:24 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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Hello;

I am a 79-year-old grandmother of two young boys who has been very concerned about the environment they will inherit since 2006. They live in the Bay Area, and they deserve to have clean air to breathe every day. It is imperative that the four Bay Area refineries that are not in compliance with BAAQMD's Rule 12-15 follow the rules. In addition, I have suffered from multiple chemical sensitivity for the past 25 years. Exposure to chemicals causes me headaches, rashes, dizziness and hives. We must hold these refineries accountable.

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

Sincerely,

Frances Aubrey  
[REDACTED]  
Oakland, CA 94611

## Joseph Lapka

---

**From:** Ted Obbard [REDACTED]  
**Sent:** Tuesday, April 18, 2023 10:23 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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*The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*

*Thank you,*

*Ted*

## Joseph Lapka

---

**From:** Kobi Naseck <kobi@vision-ca.org>  
**Sent:** Tuesday, April 18, 2023 10:19 AM  
**To:** Joseph Lapka  
**Subject:** RE: Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

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Don't mess with our clean air. My comment here:

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

--

**Kobi Naseck (he/him/his)**  
**VISION Coalition Coordinator**  
Center on Race, Poverty & the Environment  
5901 Christie Ave, Suite 208  
Emeryville, CA 94608  
(214) 609-2439

## Joseph Lapka

---

**From:** Elayna Trucker [REDACTED]  
**Sent:** Tuesday, April 18, 2023 10:12 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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*The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*

A concerned citizen,

Elayna Trucker

Napa CA

## Joseph Lapka

---

**From:** Miss T. [REDACTED]  
**Sent:** Tuesday, April 18, 2023 10:12 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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*The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*

## Joseph Lapka

---

**From:** Laura Neish <laura@350bayarea.org>  
**Sent:** Tuesday, April 18, 2023 10:08 AM  
**To:** Joseph Lapka  
**Subject:** Comment re: Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

You don't often get email from laura@350bayarea.org. [Learn why this is important](#)

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Dear Mr. Lapka,

The health impacts of refinery emissions are well known, and can be devastating, so compliance with BAAQMD's requirements is critical to community health. Yet, it appears that four out of five refineries are not adequately measuring emissions. Since the Martinez Refining Company is meeting the requirements listed in the Air District's 12/22/2022 letter, it's clear that it is a reachable goal.

All refineries need to utilize equipment meeting the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. Communities need to know whether and when to protect themselves from toxic emissions.

Furthermore, all Bay Area refineries should report similar operational data, which parameters need to be developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

Thank you,

Laura Neish

**Laura Neish** (she/her)

Executive Director

[350 Bay Area](#) & [350 Bay Area Action](#)

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## Joseph Lapka

---

**From:** Randy Monroe <randy@monroescienceed.com>  
**Sent:** Tuesday, April 18, 2023 10:06 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron."

You don't often get email from randy@monroescienceed.com. [Learn why this is important](#)

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To Whom It May Concern,

*The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12:15.*

## Joseph Lapka

---

**From:** Greg Rosen [REDACTED]  
**Sent:** Tuesday, April 18, 2023 10:04 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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Hello, I wanted to provide a comment on the air monitoring:

I don't understand why four out of five refineries are not meeting BAAQMD's requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letter. They also should be required to use the same data displays so the public can understand from an apples to apples comparison how each is performing relative to one another.

Can you please take the appropriate action to encourage (or fine) the companies that are not following the regulations we set up to protect the public and their local neighbors?

Thanks,  
Greg Rosen  
Berkeley, CA

## Joseph Lapka

---

**From:** Lin Griffith [REDACTED]  
**Sent:** Tuesday, April 18, 2023 10:02 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Current refinery air monitoring plans for most of the local refineries are not meeting your requirements.

Please ensure that the refineries other than Martinez install and utilize equipment for air monitoring that will allow the public to know and trust that they are not risking our health. Thank you.

Lin Griffith  
Oakland, CA

More flights=>more pollution, more noise, more global warming. Sign the [Petition](#) to stop the Oakland Airport Expansion [www.stopOAKexpansion.org](http://www.stopOAKexpansion.org)

## Joseph Lapka

---

**From:** Elliot Helman [REDACTED]  
**Sent:** Tuesday, April 18, 2023 9:58 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

Thank you.

eliot helman  
San francisco

## Joseph Lapka

---

**From:** Laura Brody [REDACTED]  
**Sent:** Tuesday, April 18, 2023 9:51 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. Only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements. Why is that?

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing. Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required as soon as possible. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

Sincerely,

Laura Brody

## Joseph Lapka

---

**From:** Jeff Lindquist [REDACTED]  
**Sent:** Tuesday, April 18, 2023 9:50 AM  
**To:** Joseph Lapka  
**Subject:** Refinery Compliance

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

*Hope you are well. As a life-long Bay Area resident I am concerned that the revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*

*We need compliance with regulations for health and safety of our neighbors and children in the Bay Area.*

*Thank you,  
Sincerely,  
Jeff Lindquist*

## Joseph Lapka

---

**From:** John ODA <[REDACTED]>  
**Sent:** Tuesday, April 18, 2023 9:50 AM  
**To:** Joseph Lapka  
**Subject:** Fence line rules

You don't often get email from [REDACTED] [Learn why this is important](#)

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*The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*

Thank you very, John Oda

## Joseph Lapka

---

**From:** Connor Kelley [REDACTED] >  
**Sent:** Tuesday, April 18, 2023 9:45 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

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Dear Joe,

I hope you're doing well. I'm writing today to ensure that the BAAQMD is enforcing Rule 12-15. The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

## Joseph Lapka

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**From:** Tom Kabat [REDACTED]  
**Sent:** Tuesday, April 18, 2023 9:32 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

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Dear District Staff and Board,

As humans around the bay we all breathe the air the same way, multiple times per minute. We can't avoid breathing.

Please hold the 5 refineries, all to the same standard of measuring and monitoring as outlined in the Air District' 12/22/2022 letter.

That will help provide less confusing information about the content of the air we must breathe.

Thank you,

-Tom Kabat  
Environmental Engineer  
Menlo Park, CA

## Joseph Lapka

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**From:** Ann Harvey [REDACTED]  
**Sent:** Tuesday, April 18, 2023 9:25 AM  
**To:** Joseph Lapka  
**Subject:** Enforce refinery fenceline monitoring requirements

You don't often get email from [REDACTED]. [Learn why this is important](#)

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I am writing as a family doctor who cared for Contra Costa residents in the county health system until my retirement. I am distressed to learn that Martinez Refining Company is the only refinery that has met the minimum requirement for compliance with the Bay Area Air Quality Management District's Rule 12-15. MRC failed to notify the county of its serious toxic emissions last fall. The other refineries don't even have adequate monitoring in place to enable them to fully comply.

It is vital for residents' health that Bay Area refineries come into compliance with limits on toxic emissions into fenceline communities. They must be held accountable —not just by paying fines, but by installing the equipment that will meet the Air District's requirements as detailed in BAAQMD's 12/22/2022 letter, without delay.

Sincerely,

Ann Harvey, MD

Oakland, CA

## Joseph Lapka

---

**From:** acs acswrites.com <acs@acswrites.com>  
**Sent:** Tuesday, April 18, 2023 9:23 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

You don't often get email from acs@acswrites.com. [Learn why this is important](#)

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Hi there

It's come to my attention that four out of five refineries are not meeting BAAQMD's requirements. This is unacceptable—Bay Area residents have a right to clean air and we can't manage what we don't monitor.

All refineries should be using equipment that meets the Air District requirements as stated in the 12/22/2022 letters, as uniform as possible so that communities can actually compare measurements and performance across refineries. This is a matter of public health and safety, which should always take precedence over the preferences of refineries.

Thanks,

Anne-Christine

Anne-Christine Strugnell

[acs@acswrites.com](mailto:acs@acswrites.com)

[www.acswrites.com](http://www.acswrites.com)

cell

*"I just want to urge you all to have a good time while you are fighting for freedom. First of all, we don't always win, and it might get to be the only fun you'll ever have. And second of all, it's a better way to live." – Molly Ivins*



## Joseph Lapka

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**From:** Nora Roman [REDACTED]  
**Sent:** Tuesday, April 18, 2023 9:23 AM  
**To:** Joseph Lapka  
**Subject:** Clean air is non negotiable

You don't often get email from [REDACTED]. [Learn why this is important](#)

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*I am a Bay Area Resident for almost 45 years, a retired RN and a mother and grandmother. I want clean air for my family and community. I agree with the following so why bother to rewrite it?*

*The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*

*We need to do this temporarily as the long term goal is to close down all refineries and fossil fuel extraction and use. For a future for our children and grandchildren-*

*Nora Roman, RN*

## Joseph Lapka

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**From:** Natasha Kaluza [REDACTED]  
**Sent:** Tuesday, April 18, 2023 9:19 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

Natasha Kaluza

Circus Artist, Clown, Coach

<https://nam02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.coventryandkaluza.com%2F&data=05%7C01%7Cjlapka%40baaqmd.gov%7Cc4b3ca456aa04e3d27bb08db40289d16%7C855defaabdae4e6281e53bb7aa04fc3a%7C0%7C0%7C638174316625296971%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikh1aWwiLCJXVCi6Mn0%3D%7C2000%7C%7C%7C&sdata=F0W1jButfnxOI2MwS%2BeEF9lw4q0EEZwSv6YIwxDiJIs%3D&reserved=0>

"Carry your heart through this world like a life-giving sun." - Hafiz

## Joseph Lapka

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**From:** Marcia L. [REDACTED]  
**Sent:** Tuesday, April 18, 2023 9:19 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

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**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

*The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*

It is vital that the refineries be held accountable—not just by paying fines, but by installing the equipment that will meet the Air District's requirements without delay. Thank you for taking the time to send a comment to

Marcia Liberson, [REDACTED], Walnut Creek CA 94595

## Joseph Lapka

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**From:** Cynthia Hanson [REDACTED]  
**Sent:** Tuesday, April 18, 2023 9:17 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro, Chevron

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It is vital that the refineries be held accountable—not just by paying fines, but by installing the equipment that will meet the Air District's requirements without delay.

Remember, the life you save may be your own.

Sincerely,  
C. Hanson

## Joseph Lapka

---

**From:** Sarah Rodriguez [REDACTED]  
**Sent:** Tuesday, April 18, 2023 9:17 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

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The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

**It is vital that the refineries be held accountable—not just by paying fines, but by installing the equipment that will meet the Air District's requirements without delay.**

Thank you,  
Sarah Rodriguez

## Joseph Lapka

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**From:** Vanessa Warheit [REDACTED]  
**Sent:** Tuesday, April 18, 2023 9:16 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am writing to urge you to require ALL refineries in the air district to comply with clean air regulations. I live in El Cerrito, in Contra Costa County, and I was horrified to learn that refinery air monitoring plans show four out of five of our local refineries not meeting BAAQMD's requirements. It seems that the only system meeting the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan, is the open path system being utilized at the Martinez Refining Company.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display; this helps communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what is in the air we are breathing.

Furthermore, all Bay Area refineries should have similar operational and data display parameters developed and required for all the technologies they are using. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

Please ensure we are breathing clean air. We are counting on you.

Sincerely,

Vanessa Warheit  
El Cerrito, CA

--

Vanessa Warheit

Phone: [REDACTED]

pronouns: she, her, hers

[https://linktr.ee/\[REDACTED\]](https://linktr.ee/[REDACTED])

## Joseph Lapka

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**From:** SUPPORT ALERT [REDACTED]  
**Sent:** Tuesday, April 18, 2023 9:14 AM  
**To:** Joseph Lapka  
**Subject:** The subject line should read: "Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron."

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

*The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*

Sent from [Mail](#) for Windows

## Joseph Lapka

---

**From:** Ree Whitford [REDACTED] >  
**Sent:** Tuesday, April 18, 2023 9:14 AM  
**To:** Joseph Lapka  
**Subject:** "Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron."

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

*The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

*Why aren't the rules being enforced???*

*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*

Let's do something to make the rules apply to all!

Thank you,

Ree Whitford  
Producer  
[REDACTED]

<http://www.reewhitford.com>

## Joseph Lapka

---

**From:** Barbara Ungersma [REDACTED]  
**Sent:** Tuesday, April 18, 2023 9:12 AM  
**To:** Joseph Lapka  
**Subject:** "Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron."

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*The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*

*Sincerely,*

*Barbara Ungersma*

*Benicia resident*

## Joseph Lapka

---

**From:** Susan Penner [REDACTED]  
**Sent:** Tuesday, April 18, 2023 9:11 AM  
**To:** Joseph Lapka  
**Cc:** John J. Bauters  
**Subject:** Please enforce the rules!

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**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi!

I'm a grandmother who cares about the future for our kids and grandkids.

*The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*

Thanks!

--

Susan Penner, Emeryville, CA

## Joseph Lapka

---

**From:** beate bruhl [REDACTED]  
**Sent:** Tuesday, April 18, 2023 3:18 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

CAUTION: This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

Sent from my iPhone

## Joseph Lapka

---

**From:** Sabina Yates [REDACTED]  
**Sent:** Monday, April 17, 2023 8:35 PM  
**To:** Joseph Lapka  
**Subject:** Valero

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

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April 16, 2023

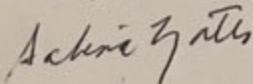
BAAQMD  
[jlapka@baaqmd.gov](mailto:jlapka@baaqmd.gov)

Why was Martinez Refining Co. the only refinery to meet the minimum air quality requirement for compliance with the Bay Area Air Quality Management District and Rule 12-15?

Valero (Benicia) and three other Bay Area refineries have failed to comply with H2S monitoring requirements of Rule 12-15 and seem to have no interest in adopting the Open Path system that Martinez used in order to comply.

Valero's non-compliance with H2S fence line monitoring affects Benicia residents. It seems that it is easier for Valero to pay the BAAQMD and EPA non-compliance fines than to comply with the rules that protect Benicia's air quality.

Sincerely,



Sabina Yates  
[REDACTED]  
Benicia, CA 94510  
[REDACTED] [REDACTED]

Sent from my iPhone

## Joseph Lapka

---

**From:** Nora Privitera [REDACTED]  
**Sent:** Monday, April 17, 2023 2:10 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The revised refinery air monitoring plans indicate that four out of five refineries are failing to meet BAAQMD's requirements. It is clear that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements, *as required*.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

Finally, the District should hold a public meeting on this important topic. It is vital that the refineries be held accountable—not just by paying fines, but by installing the equipment that will meet the Air District's requirements without delay.

Public safety demands that refineries adhere to the Air District requirements.  
Paying fines as a cost of doing business is simply not an acceptable alternative.

## Joseph Lapka

---

**From:** Jean Walker [REDACTED]  
**Sent:** Monday, April 17, 2023 12:51 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Joseph Lapka,

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements.

It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter as defined by the requirements in their Quality Assurance Project Plan (QAPP).

The systems being used at the other four refineries do not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries.

**This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing!**

In addition, I request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required *sooner rather than later*. I truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

**The District should have a public meeting on this important topic.**

It is **vital** that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District’s requirements without delay.

Thank you,

Jean Walker  
Benicia, CA

## Joseph Lapka

---

**From:** Alvaro Ramos [REDACTED]  
**Sent:** Monday, April 17, 2023 12:15 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear BAAQMD,

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

Finally, the District should hold a public meeting on this important topic. It is vital that the refineries be held accountable—not just by paying fines, but by installing the equipment that will meet the Air District's requirements without delay.

Sincerely,

Alvaro Ramos

## Joseph Lapka

---

**From:** Glidden, John M. <JMGlidden@SolanoCounty.com>  
**Sent:** Monday, April 17, 2023 11:14 AM  
**To:** Joseph Lapka  
**Subject:** Letter re: Air Monitoring and Quality Assurance Program Plans  
**Attachments:** 041723 BBAQMD Letter\_0001.pdf

You don't often get email from jmglidden@solanocounty.com. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Sir:

Please see the attached from Solano County Supervisor Monica Brown re: the Air Monitoring and Quality Assurance Program Plans.

Let me know if you have any questions.

John

John Glidden  
District Representative  
Solano County Supervisor Monica Brown  
District 2  
(707) 784-3004  
Jmglidden@solanocounty.com

## Joseph Lapka

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**From:** June Mejias [REDACTED]  
**Sent:** Monday, April 17, 2023 9:43 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

CAUTION: This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.<BR><BR>In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.<BR><BR>It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.<BR><BR>There should also be a public meeting about this important topic.

Sent from my iPhone

## Joseph Lapka

---

**From:** "Linda Stone" [REDACTED]  
**Sent:** Monday, April 17, 2023 9:42 AM  
**To:** Joseph Lapka  
**Subject:** Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Lapka,

The revised refinery air monitoring plans show that four out of five refineries, including Valero, are not meeting BAAQMD's requirements. It is apparent that the open path system being utilized at the Martinez Refining Company is the only system that meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The system being used at Valero and other plants does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance.

This isn't just about following the rules, it's about public health and safety. We deserve to know what we are breathing!

All Bay area refineries must be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

Thank you for your attention to this matter.

Sincerely,

Linda Stone  
Benicia

## Joseph Lapka

---

**From:** Susan Penner [REDACTED]  
**Sent:** Monday, April 17, 2023 7:35 AM  
**To:** Joseph Lapka  
**Cc:** John J. Bauters  
**Subject:** Please enforce regulations!

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi! I'm a voter and concerned grandmother who cares about air quality.

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

Finally, the District should hold a public meeting on this important topic. It is vital that the refineries be held accountable—not just by paying fines, but by installing the equipment that will meet the Air District's requirements without delay.

Thanks

Dr. HSusan Penner, Emeryville CA

## Joseph Lapka

---

**From:** Tim Sullivan <[REDACTED]>  
**Sent:** Sunday, April 16, 2023 7:16 PM  
**To:** Joseph Lapka  
**Subject:** "Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron."

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

Please conduct an investigation and follow-up on above refineries apparently not in compliance with BAAQMD and Rule 12-15.

Thank you,

Timothy Sullivan  
Benicia, CA

## Joseph Lapka

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**From:** Greg Plant [REDACTED]  
**Sent:** Sunday, April 16, 2023 6:45 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

You don't often get email from [REDACTED] [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements used *only* at the Martinez Refining Company. The systems being used at the other four refineries does not meet these requirements. Valero, here in Benicia, has consistently over the years ignored or violated requirements related to their operating with safe processes. This is yet another instance!

All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that all refineries, including our local refinery Valero, be held accountable—not just by paying fines—but by **installing** the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

Peace 🙏 be with you!

*Greg Plant*

[REDACTED]  
Benicia CA (just down the hill from Valero)

## Joseph Lapka

---

**From:** Lori Grundman [REDACTED]  
**Sent:** Sunday, April 16, 2023 11:17 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Members of the BAAQMD Board,

I own a home along the waterfront in East Benicia. I am directly impacted by every accidental emission, flaring, fire, etc., at Valero and Martinez Refining Company. I also suffer from multiple health conditions, making me particularly vulnerable to the dangerous toxins released during these events.

As I understand it, four out of five refineries do not currently meet the requirements set by BAAQMD. The fact that MRC is able to meet this January 2023 requirement proves that the equipment is readily available, and thus EVERY refinery should be able to obtain them immediately to meet compliance. It's vital to have standards with which to compare data, in order for there to be any value. This is not just about imposing fines; it's about protecting the health and safety of the community!

This is an critical topic, affecting everyone in the surrounding communities. The District should hold a public meeting, giving citizens an opportunity to respond with public comments. I also urge the Board to consider standardizing operational and display parameters across the board, for ALL refineries.

As a vulnerable neighbor living within close proximity to the refineries, I ask that every possible action is exercised to keep the refineries accountable to Rule 12-15 as soon as possible.

Thank you for your time and consideration.

Lori Grundman  
Benicia Resident

## Joseph Lapka

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**From:** Sandra Cioppa [REDACTED]  
**Sent:** Saturday, April 15, 2023 8:25 PM  
**To:** Joseph Lapka  
**Subject:** air quality

You don't often get email from [REDACTED] [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries do not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

The District should have a public meeting on this important topic.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

Sandra MacKenzie-Cioppa  
[REDACTED] Benicia 94510

## Joseph Lapka

---

**From:** MOLLY BOGGS [REDACTED]  
**Sent:** Saturday, April 15, 2023 3:23 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fence line Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

You don't often get email from [REDACTED] [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear BAAQMD representative,

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries do not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

The District should have a public meeting on this important topic.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

Please help! I watched the thick smoke last week from Phillips 66 "flaring event" come toward me last week. I am assuming that the life expectancy charts just don't apply to those of us who live in the path of the wind from the refineries. I have begged to have a monitor to help detect, but no one apparently really wants to know. I live on a hillside and have electricity available to monitor the air on the West side of Benicia.

Does anyone care?

Thank you,

Molly Boggs  
[REDACTED]

Benicia, CA 94510  
[REDACTED]

## Joseph Lapka

---

**From:** [REDACTED]  
**Sent:** Saturday, April 15, 2023 12:25 PM  
**To:** Joseph Lapka  
**Subject:** "Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron."

**Importance:** High

You don't often get email from [REDACTED]. [Learn why this is important](#)

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The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

**It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.**

There should also be a public meeting about this important topic.

Cathy Bennett  
Benicia Resident

## Joseph Lapka

---

**From:** Will McGarvey <eye4cee@gmail.com>  
**Sent:** Saturday, April 15, 2023 11:52 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

You don't often get email from eye4cee@gmail.com. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Joe Lapka,

I serve in Contra Costa County, and live 1 mile from the Valero Refinery. Our Interfaith Climate Action Network has been tracking the many extra emissions and flare offs of the five refineries in our region, and are shocked you haven't yet made fence line monitoring a reality at each one. Your lack of oversight of the Benzene emissions from Valero are a point of personal frustration living downwind when the winds change here.

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

*"Envisioning a World of Interfaith Peace."*

Shalom, Peace, Salaam, Om Shanti, Solh, Amani, Paz, 평화, Ping On...

Rev. Will McGarvey  
Executive Director  
Interfaith Council of Contra Costa County  
404 Gregory Lane – Rm 1  
Pleasant Hill, CA 94523  
(925) 822-3744 office

[eye4cee@gmail.com](mailto:eye4cee@gmail.com)



Please consider the environment before printing.

I'm writing you from occupied Patwin/Karkin/Ohlone land. If you'd like to learn more about the Indigenous people whose land you occupy, the information is now just a text message away. Click [here](#) to learn more.

## Joseph Lapka

---

**From:** Karen Schlumpp [REDACTED]  
**Sent:** Saturday, April 15, 2023 11:41 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

## Joseph Lapka

---

**From:** David Jens Thomas Pedersen [REDACTED]  
**Sent:** Saturday, April 15, 2023 1:44 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro, and Chevron

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Lapka,

The revised refinery air-monitoring plans show that four out of five refineries are not meeting the BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules - it's about public health and safety as well. Everyone deserves to know what they are breathing!

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data-display parameters developed and required soon, especially higher reporting frequencies (once per hour is woefully inadequate, especially when most air-monitoring apparatus are capable of reporting as often as every few seconds) and public visibility (i.e. real-time online monitoring maps). We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable - not just by paying fines, but also by installing the equipment that will meet the Air District's requirements as expeditiously as possible.

There should also be a public meeting about this important topic, and I would be delighted to attend such a meeting despite not being a resident of your air district.

Thank you for your time and consideration,

David Pedersen

*De facto* member of the Bay Area Clean Air Coalition (BACAC) and resident on unceded WSÁNEĆ territory (Saanichton, British Columbia, Canada)

## Joseph Lapka

---

**From:** Peter Adams [REDACTED]  
**Sent:** Friday, April 14, 2023 8:33 PM  
**To:** Joseph Lapka  
**Subject:** Refinery emission monitoring

You don't often get email from [REDACTED] [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

My name is Peter Adams; a resident of Benicia. It has come to my attention that only one of the 5 Bay Area refineries is meeting regulations for reporting emissions. I have not forgotten that your organization's inaction regarding Valero's emissions of hydrogen and toxic substances for ten years caused the residents' health and your reputation great harm.. All refineries under your jurisdiction must meet standards or pay a very high price until they do. I urge you to act in the best interest of citizens' health rather than the desires of certain refineries who apparently feel they can get away with anything they choose.

Regards, Peter Adams

<[REDACTED]>

## Joseph Lapka

---

**From:** Kristel Rietesel [REDACTED]  
**Sent:** Friday, April 14, 2023 7:14 PM  
**To:** Joseph Lapka  
**Subject:** All refineries should utilize equipment that meets the Air District requirements

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**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic. As my daughter and I suffer from asthma and live close to a refinery, this matters a lot.

Sincerely,

Kristel Rietesel

Admin. of Bay Area Clean Air Coalition (114 members)

## Joseph Lapka

---

**From:** Tim Morgan <tmorgan@eaap.ca.gov>  
**Sent:** Friday, April 14, 2023 5:21 PM  
**To:** Joseph Lapka  
**Subject:** Refinery Air Quality Monitoring

You don't often get email from tmorgan@eaap.ca.gov. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

My wife and I live in Benicia, and have for nearly 23 years. We currently telework most of the time. Sometimes it seems that our local air is better than that in Sacramento where my office sits.

Sweeping away all of the details, I think it is OUTRAGEOUS that four local refineries have, for about 14 years (as I read someplace) used only fence-line monitoring of toxic leaks. Valero, for example, is NOT a foreign country with any right to limit inspections and monitoring. Now that the regulators have faced the issue of adequate monitoring WITHIN the refineries' territory, one can only wonder WHY HAS IT TAKEN SO LONG?

Timothy E. Morgan  
[Not an official comment]

Sent from [Mail](#) for Windows

## Joseph Lapka

---

**From:** heather lee <[REDACTED]>  
**Sent:** Friday, April 14, 2023 4:20 PM  
**To:** Joseph Lapka  
**Subject:** Benicia Air & Valero

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

Thank you,  
Heather Lee  
Benicia resident

## Joseph Lapka

---

**From:** Sharon Maher [REDACTED]  
**Sent:** Friday, April 14, 2023 2:17 PM  
**To:** Joseph Lapka  
**Cc:** Sharon Maher  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

You don't often get email from [REDACTED]. [Learn why this is important](#)

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Hello Joe.

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

I am a concerned citizen that lives in Benicia. I look forward to hearing about, and attending, a public meeting once one is established.

Regards,  
Sharon Maher  
[REDACTED]

## Joseph Lapka

---

**From:** Catherine Flitcroft [REDACTED]  
**Sent:** Friday, April 14, 2023 1:23 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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Dear Mr. Lapka,

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, I request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. I truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

I believe there should also be a public meeting about this important topic.

## Joseph Lapka

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**From:** Merry Gregg [REDACTED]  
**Sent:** Friday, April 14, 2023 11:33 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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Urgent that Valero comply! Valero is currently failing!

Thank you,  
Merry Gregg  
Benicia Resident

## Joseph Lapka

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**From:** Ciriscioli [REDACTED]  
**Sent:** Friday, April 14, 2023 9:30 AM  
**To:** Joseph Lapka  
**Subject:** "Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron".

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"The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries do not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

The District should have a public meeting on this important topic.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay. "

## Joseph Lapka

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**From:** Kimberly Klein [REDACTED]  
**Sent:** Friday, April 14, 2023 9:18 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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Dear BAAQMD:

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

Thank you,  
Kimberly Klein, another concerned resident

## Joseph Lapka

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**From:** Sandra Summerfield Kozak, MSc [REDACTED]  
**Sent:** Friday, April 14, 2023 8:43 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

Sandra Summerfield Kozak M.S., ERYT-500, C-IAYT

<https://nam02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.internationallyogastudies.com%2F&data=05%7C01%7Cjlapka%40baaqmd.gov%7Cae42f82f0d954d8e6f3d08db3cfef3f2%7C855defaabdae4e6281e53bb7aa04fc3a%7C0%7C0%7C638170837935440697%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=HF5ylxTf1TrCcYow82nOBkicl6fyxQn35tjxZ5MaVA%3D&reserved=0>

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iphone sent

## Joseph Lapka

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**From:** Sandra Summerfield Kozak, MSc <[REDACTED]>  
**Sent:** Friday, April 14, 2023 8:05 AM  
**To:** Joseph Lapka  
**Subject:** Oil refinery misconduct- you can make a difference!

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Dear BAAQMD representative,

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries do not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

The District should have a public meeting on this important topic.

To the refineries must be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay!

Thank you,

Sandra Summerfield Kozak M.S., ERYT-500, C-IAYT

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iphone sent

## Joseph Lapka

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**From:** Betty Lobos [REDACTED]  
**Sent:** Thursday, April 13, 2023 7:56 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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Four out of five refineries in the Bay Area are not meeting BAAQMD's requirements. Only the open path system used at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP).

All refineries should be compelled to use equipment that meets the Air District requirements. Uniform data collection and display is essential to allow communities to compare measurements and performance across refineries. This is about public health and safety! We deserve to know what we are breathing.

Technologies used at all Bay Area refineries MUST have similar operational and data display parameters developed and required SOON. This will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

The District should have a public meeting on this important topic. It is vital that the refineries be held accountable—not just by paying fines—but by installing equipment that meets the Air District's requirements without delay.

Please address these delinquencies. Thank you.

Elizabeth Lobos  
Concord, CA 94520

## Joseph Lapka

---

**From:** N. Carey [REDACTED]  
**Sent:** Thursday, April 13, 2023 7:40 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

Sent from my iPhone

## Joseph Lapka

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**From:** jass1013 [REDACTED]  
**Sent:** Thursday, April 13, 2023 6:07 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

It is past time to have a course correction toward accountability re: the the repetitive issues mentioned above. Also, the communities that are affected by the myriad kinds of toxicity the oil refineries release that go against required legal limits for health and safety deserve to receive the a fair share of funds from violator's fees.

A request is being made for a legally enforced adequate timeline for necessary adaptations and repairs to be made when necessary after an acknowledged toxic incident happens. Stiffer fines that can't renegotiated would be wise to set up legally. The leniency re: how much needs to be paid and the deadline of payment needs to be reigned in. A bill is due when a bill is due. Not negotiable.

Also the issue of receiving payment for fines needs to be readdressed with due respect, fairness and concern for the areas and populations suffering the results of contamination refineries cause that go against stated regulations.

Our City of Benicia has yet to receive funds from violations of long standing. And generally BAAQMD allows much lenience as to when fines have to finally be paid to them. Usually they get seriously watered down through a series of court actions. The revenue from most fines do not trickle down to our city.

Sincerely,

Judith S. Sullivan, M.S.W.

Steering committee member of "Benicians for a Safe and Healthy Community," BSHC).

Sent from my T-Mobile 5G Device

## Joseph Lapka

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**From:** [REDACTED]  
**Sent:** Thursday, April 13, 2023 5:19 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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Hi Joe – I am a 26-year resident of Benicia, and have longstanding serious concerns about refinery emissions and air monitoring in Benicia. I am also concerned about the same issues with regard to the four other refineries in the Bay Area, noting that the other refineries are all positioned such that our prevalent westerly winds most often blow emissions our way.

I join with others here in Benicia: “The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD’s requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District’s 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn’t just about following the rules, it’s about public health and safety! We deserve to know what we are breathing.

“In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

“It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District’s requirements without delay.

“There should also be a public meeting about this important topic.”

Please add my comment as public input for the BAAQMD’s Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

**Roger Straw**

[REDACTED], Benicia CA 94510  
[REDACTED]

## Joseph Lapka

---

**From:** Betty Lucas [REDACTED]  
**Sent:** Thursday, April 13, 2023 5:16 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

Betty Lucas  
[REDACTED]

## Joseph Lapka

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**From:** Andrea Kroll [REDACTED]  
**Sent:** Thursday, April 13, 2023 4:29 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

Andrea Kroll  
Sent from my iPhone

## Joseph Lapka

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**From:** Daniel Morgan [REDACTED]  
**Sent:** Thursday, April 13, 2023 4:25 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

## Joseph Lapka

---

**From:** Hilary Decker <[REDACTED]>  
**Sent:** Thursday, April 13, 2023 4:25 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

Thank you for your time.

Hilary Aitken  
Benicia Resident

Sent from my iPhone

## Joseph Lapka

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**From:** Christine Stevens [REDACTED]  
**Sent:** Thursday, April 13, 2023 4:00 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

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The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP).

I am requesting that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

The Valero refinery in Benicia has a poor record with respect to admissions.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

Christine Stevens  
Benicia  
Sent from my iPhone

## Joseph Lapka

---

**From:** Lisa Reinertson [REDACTED]  
**Sent:** Thursday, April 13, 2023 3:55 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Joe Lapka,

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

Sincerely,

Lisa Reinertson  
Benicia, CA

## Joseph Lapka

---

**From:** Kate Lenhardt [REDACTED]  
**Sent:** Thursday, April 13, 2023 3:30 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

You don't often get email from [REDACTED]. [Learn why this is important](#)

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The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries do not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

The District should have a public meeting on this important topic.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

Sincerely,  
Kate Lenhardt  
Climate Action Committee  
Mount Diablo Unitarian Universalist Church

## Joseph Lapka

---

**From:** Nathalie Christian [REDACTED]  
**Sent:** Thursday, April 13, 2023 2:09 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Lapka,

This is generic comment but please don't take my copy-and-paste job as indication of a cursory or passing interest. I just think the author spelled out the need perfectly and I don't see a need to tweak it beyond explaining that copying and pasting does not signify low interest. I am very interested.

I particularly echo the request for a public meeting.

--

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

## Joseph Lapka

---

**From:** Judie [REDACTED]  
**Sent:** Thursday, April 13, 2023 1:15 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron."

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**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

## Thank you for taking a stand with us!

Sincerely,  
Judith Ghidinelli  
Sharon Page Ritchie  
Benicia

Sent from my iPad

## Joseph Lapka

---

**From:** Stan Golovich <[REDACTED]>  
**Sent:** Thursday, April 13, 2023 12:40 PM  
**To:** Joseph Lapka  
**Subject:** QAPP enforcement

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**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Lapka:

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

Thank you,

Stan Golovich

[REDACTED]  
Benicia, CA 94510

## Joseph Lapka

---

**From:** Eric Byrne [REDACTED]  
**Sent:** Thursday, April 13, 2023 9:42 AM  
**To:** Joseph Lapka  
**Subject:** Vallero

You don't often get email from [REDACTED] [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

## Joseph Lapka

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**From:** Andrew Smith [REDACTED]  
**Sent:** Thursday, April 13, 2023 7:59 AM  
**To:** Joseph Lapka  
**Subject:** comment on revised draft air monitoring plans for Valero,Phillips66,Tesoro, Chevron

You don't often get email from [REDACTED]. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear BAAQMD representative,

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries do not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

The District should have a public meeting on this important topic.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

Thank you,

Andrew Smith

## Joseph Lapka

---

**From:** Denise Cullen <[REDACTED]>  
**Sent:** Thursday, April 13, 2023 7:55 AM  
**To:** Joseph Lapka  
**Subject:** Air Quality Monitoring Benicia & Bay Area Refineries

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

CAUTION: This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear BAAQMD representative,

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries do not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

The District should have a public meeting on this important topic.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

Thank you,  
Denise Cullen

## Joseph Lapka

---

**From:** Pat Toth-Smith [REDACTED] >  
**Sent:** Thursday, April 13, 2023 5:12 AM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron”.

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**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear BAAQMD representative,

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD’s requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District’s 12/22/2022 letter as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries do not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn’t just about following the rules, it’s about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

The District should have a public meeting on this important topic.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District’s requirements without delay.  
Thank you, Pat Toth-Smith Benicia Resident

## Joseph Lapka

---

**From:** Nancy Holdridge [REDACTED]  
**Sent:** Wednesday, April 12, 2023 6:52 PM  
**To:** Joseph Lapka  
**Subject:** Bay area refineries

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**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Lapka,

Please excuse the copied letter, I couldn't say it any better. It expresses my sentiments exactly.

The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

There should also be a public meeting about this important topic.

Regards,  
Nancy Holdridge  
[REDACTED]  
Benicia CA 94510  
[REDACTED]

## Joseph Lapka

---

**From:** Vicki Dennis [REDACTED]  
**Sent:** Wednesday, April 12, 2023 6:35 PM  
**To:** Joseph Lapka  
**Subject:** Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron.

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Mr. Lapka:

As Benicia residents, we are very concerned about the revised refinery air monitoring plans. They indicate that four out of five refineries in the Bay Area, including Benicia's own Valero Refinery, are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan (QAPP). The systems being used at the other four refineries does not meet these requirements. All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to allow communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.

In addition, we request that all technologies used at all Bay Area refineries have similar operational and data display parameters developed and required soon. We truly feel this will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.

It is vital that the refineries be held accountable—not just by paying fines—but by installing the equipment that will meet the Air District's requirements without delay.

We also ask that there be a public meeting about this important topic so we can all be more fully informed and have a chance to present our concerns.

Regards,

Ralph and Vicki Dennis, Benicia residents

## Joseph Lapka

---

**From:** George Day [REDACTED]  
**Sent:** Wednesday, April 12, 2023 9:55 AM  
**To:** Joseph Lapka  
**Subject:** Enforcement of Refinery Fenceline Monitor Rules

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**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Sir,

I live in Benicia approximately 1 mile West of the Valero Refinery. It is my understanding that, although BAAQMD has adopted clear regulations requiring all Bay Area refineries to install, monitor and report the results of fenceline monitoring devices so that improper emissions can be reported, leading to appropriate remediation and/or penalties, the Valero Refinery has failed to install such monitors.

In light of the history of Valero failing to report dangerous emissions and other violations of air quality standards, I urge BAAQMD to take all actions available to it to compel compliance by Valero with all applicable requirements, including but not limited to the fenceline monitors. Valero appears to be a serial violator, consciously and willfully ignoring valid legal requirements and jeopardizing the health and safety of the citizens of Benicia and surrounding communities. As they appear to put profits over their other legal obligations, make them pay dearly AND comply.

George Day  
[REDACTED]  
Benicia, CA 94510

[REDACTED]

## Joseph Lapka

---

**From:** Jerry Bovee  
**Sent:** Tuesday, April 11, 2023 4:12 PM  
**To:** Joseph Lapka  
**Cc:** Daniel S. Madrigal; Katherine Hoag; Ranyee Chiang  
**Subject:** FW: BCAMP Comment Letter to Air Distric:Reg 12, Rule 15 compliance & enforcement by Bay Area refineries re Air Monitoring Plans & Quality Assurance Project Plans  
**Attachments:** Microsoft Word - BCAMP Letr to BAAQMD\_QAPP&AMPs.4.11.23 docx.docx.pdf

Hi Joe,

I thought these were supposed to be going to you, but perhaps that has changed.

Jerry Bovee, P.E., QSTI (He/Him/His)  
Air Quality Engineering Manager  
Meteorology and Measurement Division  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105  
Office: 415.749.4601  
Fax: 415.749.4922  
jbovee@baaqmd.gov /  
<https://nam02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.baaqmd.gov%2F&data=05%7C01%7Cjlapka%40baaqmd.gov%7Cff9321c4bed840861cf608db3ae22c91%7C855defaabdae4e6281e53bb7aa04fc3a%7C0%7C0%7C638168515317184391%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikk1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C&sdata=%2FNOAIPVJMsGc53LJofexxf8%2BxJV5WznojF517zVHQpw%3D&reserved=0>

-----Original Message-----

From: Marilyn Bardet <[REDACTED]>  
Sent: Tuesday, April 11, 2023 4:10 PM  
To: Daniel S. Madrigal <dmadrigal@baaqmd.gov>; Jerry Bovee <jbovee@baaqmd.gov>; Katherine Hoag <khoag@baaqmd.gov>  
Cc: David Lindsay <[REDACTED]>; Kathy Kerridge <[REDACTED]>; Nancy Lund <[REDACTED]>; C Bart Sullivan <[REDACTED]>; Shoshana Wechsler <[REDACTED]>; Steve Young <SYoung@ci.benicia.ca.us>; BAAQMDCoalition <[REDACTED]>; [REDACTED]  
Subject: BCAMP Comment Letter to Air Distric:Reg 12, Rule 15 compliance & enforcement by Bay Area refineries re Air Monitoring Plans & Quality Assurance Project Plans

CAUTION: This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello BAAQMD's Air Monitoring, Meteorology & Measurement Division,

BCAMP, [Benicia Community Air Monitoring Program], is responding to your request for public comment on Bay Area refineries submittals on their air monitoring plans [AMPs] and Quality Assurance Project Plans [QAPP] for fence-line systems, with special concern for the monitoring of hydrogen sulfide gas [H<sub>2</sub>S]. Regulation 12, Rule 15 [Rule12-15] is

intended to assure reliable monitoring performance and accurate, trustworthy real time data reporting to the public, in accordance with the Rule adopted in 2017 and as upgraded since.

As a result of our review, as outlined in our letter, we have found disturbing similarities in compliance failures in 4 of 5 Bay Area refineries: Chevron, Phillips66, Tesoro and Valero, which all share the same monitoring contractor. Our comments address those failures with examples.

We are calling for a public meeting, hosted by BAAQMD, to follow up on the comments and questions posed by others that may guide further upgrades to Rule 12-15 for the benefit of protecting public health and safety.

We support strictest enforcement of Rule 12-15 to include significant fines for non-compliance until reliable, proven technology is installed that meet all Rule 12-15's requirements and performance standards.

Thank you for your work on the public's behalf, and for your current review of refinery compliance of great importance to communities.

Respectfully,

Marilyn Bardet  
BCAMP board member

## Joseph Lapka

---

**From:** Bruce Kaplan <[REDACTED]>  
**Sent:** Thursday, March 23, 2023 2:37 PM  
**To:** Joseph Lapka  
**Subject:** Fenceline reporting - Chevron

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

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Hello,

I'm a Point Richmond resident with a keen interest in the Chevron refinery's emissions performance. My wife and I live about 1000 feet from the refinery gates.

I skimmed the plan, and I'm hopeful Chevron will comply with BAAQD guidelines for HS2 monitoring. Most of the information though is way above my pay grade.

This may be somewhat out of the scope of the issue currently being reviewed, but my comments are about the reporting of the Fenceline measurements in a way that is useful and understandable to the non-technical members of the community.

I would like to see the data aggregated and summarized, selectable by different time periods, and measured against established targets, which I suppose would be some percentage of the REL.

This should be presented in an easy to interpret way on a single dashboard page or two.

This would allow residents to see how often there were measurements that exceeded REL levels or some other appropriate threshold that might indicate a health threat for each compound that is measured.

In effect, the Refinery should get a score each week, and each refinery should be compared to the others in terms of their compliance.

This summary data should be widely distributed to residents in range of these emissions.

This might put further pressure on refineries to meet emissions compliance.

Thank you,  
Bruce Kaplan

Check out the music at

<https://nam02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.claudiarussell.com%2F&data=05%7C01%7Cjlapka%40baaqmd.gov%7C6ac8b02f059c42218b3508db2be6bb0f%7C855defaabdae4e6281e53bb7aa04fc3a%7C0%7C0%7C638152042209034495%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=jHULMo4kxq58oL3%2B5j1pt5EodsSZmKJaMGjvvUXweM%3D&reserved=0>

## Joseph Lapka

---

**From:** Justin Truong [REDACTED] >  
**Sent:** Tuesday, April 18, 2023 10:49 AM  
**To:** Joseph Lapka  
**Subject:** "Comment on Revised Draft Refinery Fenceline Air Monitoring Plans for Valero, Phillips 66, Tesoro and Chevron."

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*The revised refinery air monitoring plans show that four out of five refineries are not meeting BAAQMD's requirements. It is apparent that only the open path system being utilized at the Martinez Refining Company meets the requirements listed in the Air District's 12/22/2022 letter, as defined by the requirements in their Quality Assurance Project Plan. The systems being used at the other four refineries do not meet these requirements.*

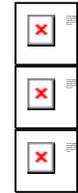
*All refineries should utilize equipment that meets the Air District requirements as stated in the 12/22/2022 letters. All requirements across all Bay Area refineries should be as uniform as possible in operation and data display to enable communities to compare measurements and performance across refineries. This isn't just about following the rules, it's about public health and safety! We deserve to know what we are breathing.*

*Furthermore, all technologies used at all Bay Area refineries should have similar operational and data display parameters developed and required soon. This*

*will help re-establish community trust in the data generated by the technologies in use as part of Rule 12-15.*



**Compose:**  
**“Comment on Revised Draft Refinery  
Fenceline Air Monitoring Plans for Valero,  
Phillips 66, Tesoro and Chevron.”**



[jlapka@baaqmd.gov](mailto:jlapka@baaqmd.gov)

[ ]