

July 31 BAAQMD Board of Directors Meeting

1. Particulate matter smaller than 2.5 microns (PM2.5) is the leading cause of deaths due to air pollution. The World Health Organization estimates worldwide 4.2 million premature deaths occur annually due to particulate pollution. Both the U.S. EPA and the California Office of Environmental Health Hazard Assessment (OEHHA) have concluded there is an overwhelming relationship between PM2.5 and premature deaths . BAAQMD estimates that up to 3000 people in the Bay Area die from PM exposure per year. All these groups agree that poor and people of color communities are disproportionately affected by PM 2.5 pollution.
2. Yet the Trump administration is attacking the fundamental science behind these conclusions, as it is with the science behind climate change. Will the BAAQMD Board of Directors stand with the public health and science experts or with Trump and the GOP's anti-science pro fossil fuel agenda?
3. The primary industrial sources of PM2.5 emissions under BAAQMD responsibility are the 5 oil refineries in the East Bay. Within the refineries, facilities for "cracking" heavy crudes into useable fuels are the primary emission sources.
4. There are proven solutions to drastically reduce PM 2.5 emissions from these units. The following Rules under development by BAAQMD can significantly improve public health outcomes in the Bay Area:
 - a. Rule 6-5 for the Fluid Catalytic Cracking Unit (FCCU) - Delayed since 2017
 - b. Rule 9-1 for fuel gas hydrotreating - Delayed since 2015
5. Additionally, PM2.5 refinery emissions are enhanced by the pollution trading system. A cross-basin PM2.5 pollution trading ban – Rule 2-4 - has been delayed since 2017.
6. Finally, a fourth source – a refinery fuel combustion reduction strategy addressed in Rule 13-XX - has also been delayed since 2017.
7. BAAQMD has created the Refinery Rules Technical Working Group (TWG) with the stated goal of providing the community early access to the rule making process.
8. Yet after multiple meetings BAAQMD staff is still unable to provide any schedule for addressing these rules. None of these rules on are the 2019 schedule for the Refinery Technical Working Group released to date.
9. On 17 June, 2019 representatives of 16 community organizations signed a letter addressed to Mr. Broadbent, outlining our concerns about these delays and requesting a schedule for BAAQMD to publicly address rule development for these four areas.
10. APCO Jack Broadbent's 24 June response gave no feedback at all on 3 out of these 4 objectives. On Rule 6-5, he provided a generic 2019-2020 timeline with no specific timelines for action. Again, while mentioning the Refinery TWG he gave no indication when BAAQMD would be ready to address Rule 6-5 in that group.
11. We therefore request that the Board of Directors direct BAAQMD staff, within the next 30 days, to provide a detailed timeline for addressing these four rules.