# **Rule 6-5:** A Commonsense Rule Requiring a Common Technology

The Bay Area Air Quality Management District is poised to adopt Rule 6-5, which would provide longoverdue public health protections to environmental justice communities. This rule would likely require the Chevron Richmond and PBF Martinez refineries to install a technology called wet gas scrubbing on their worst polluting units, known as *Fluidized Catalytic Cracking Units*, or FCCUs.

In response, the refineries have complained that this requirement is extreme, overly expensive, and have used legal threats to try and barter for alternative, less effective, and more dangerous solutions that will continue to cause deaths and chronic health conditions each year.

However, both refineries ignore the fact that wet gas scrubbing is common, already in use at a majority of refineries across the country - *including the majority of PBF's own facilities across the country*. And yet, PBF opposes the use of this technology for their Bay Area refinery, even though its use is standard for the company.

## Four of PBF's Five Other Refineries Already Use Wet Scrubbers

US EPA records, confirmed through a review of Title V permits and EPA Consent Decrees, show that four of PBF's five other refineries **already** use wet gas scrubbers to abate emissions from their FCCUs.

If this technology is already being used by most PBF refineries across the country, why can't they install it here?

### Delaware City, Delaware

Acquired from Valero in 2010



PM Abatement: Regenerative Wet Gas Scrubber Why: 2004 US EPA Consent Decree

Paulsboro, New Jersey

Acquired from Valero in 2010



**PM Abatement:** Wet Gas Scrubber **Why:** 2005 US EPA Consent Decree

**Toledo, Ohio** Acquired from Sunoco in 2011



**PM Abatement:** Wet Gas Scrubber **Why:** 2006 US EPA Consent Decree

### Chalmette, Louisiana

Acquired from ExxonMobil and PDV Chalmette in 2015



PM Abatement: Wet Gas Scrubber Why: Unknown (Installed in 1984)

## What about PBF's Fifth Refinery?

In 2015, the Torrance refinery, then under the ownership of ExxonMobil, exploded. This was due to gas ignition in its Electrostatic Precipitator (ESP), the technology currently in use at the PBF Martinez refinery. This explosion ultimately cost the California economy a total of **\$6.9 billion**. PBF acquired the refinery from ExxonMobil in 2016, and continues to use an ESP for its FCCU abatement.



Opponents of this rule want to continue to rely on this dangerous and costly technology in the Bay Area instead.

# **Citations and Sources**

#### **Torrance Refinery:**

- https://investors.pbfenergy.com/news/2016/07-01-2016-113123883 (Acquisition from ExxonMobil)
- <u>http://www.aqmd.gov/docs/default-source/planning/hf-at-refineries/final-report-to-refinery-committee-on-proffer-status---december-2020.pdf?</u> <u>sfvrsn=8</u> (*Current Use of ESP*)
- <u>https://www.rand.org/content/dam/rand/pubs/research\_reports/RR1400/RR1421/RAND\_RR1421.pdf</u> at p. 79 (Economic Impact of Explosion)
- <u>https://www.csb.gov/csb-releases-final-report-into-2015-explosion-at-exxonmobil-refinery-in-torrance-california/</u> (ESP Cause of Explosion)

#### **Delaware City Refinery:**

- <u>https://apps.dnrec.delaware.gov/dochandler/handler.ashx?</u>
  <u>ob=1&docid=51624&chks=f5807a9638802edc416ef3d2513e777cc3e75d8bfae42e02e27f8c6bd229fd1b365bc29eba41f1993105f66a5394</u>
  <u>4847&docName=AQ</u> at p. 1 and p. 254 (*Acquisition & Title V*)
- <u>https://www.epa.gov/sites/default/files/documents/motiva3rd-amendment\_0.pdf</u> at p. 21 (Consent Decree)

#### Paulsboro Refinery:

- https://investors.pbfenergy.com/news/2010/12-17-2010 (Acquisition from Valero)
- <u>https://www.state.nj.us/dep/aqpp/downloads/publicnotpost/prcepn.pdf</u> at p. 33 (*Title V*)
- https://www.epa.gov/sites/default/files/documents/valero-cd.pdf at p. 35 (Consent Decree)

#### **Toledo Refinery:**

- https://investors.pbfenergy.com/news/2011/03-01-2011 (Acquisition from Sunoco)
- http://wwwapp.epa.ohio.gov/dapc/permits\_issued/1868305.pdf at p. 215 (Title V)
- <u>https://www.epa.gov/sites/default/files/documents/sunoco-cd.pdf</u> (Consent Decree)

#### **Chalmette Refinery:**

- https://investors.pbfenergy.com/news/2015/11-02-2015 (Acquisition from ExxonMobil)
- https://www.epa.gov/sites/default/files/2017-07/documents/chalmette-cd.pdf at p. 8 (Consent Decree)
- See Component 1 Data of 2011 U.S. EPA Information Collection Request to the U.S. petroleum refining industry.
  <u>https://www.epa.gov/stationary-sources-air-pollution/comprehensive-data-collected-petroleum-refining-sector</u> (*Prevalent of Wet Scrubbers at U.S. Refineries*)
- PBF Energy (Image Credits)

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