



SIERRA CLUB



April 1, 2021

VIA: ELECTRONIC MAIL ONLY

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Re: Proposed Delay of Refinery Rule 1109.1 to September 2021

Dear Governing Board Members,

The undersigned organizations write to express concern about the South Coast AQMD's proposal to delay finalizing Refinery Rule 1109.1 to September 2021. The agency originally committed itself to adopting Refinery Rule 1109.1 by October 2019. Since then, the South Coast AQMD has postponed finalizing this rule several times, with the most recent delay to June 2021.

These delays have only weakened the regulation, including recently proposed changes that allow for increased pollution and diminished accountability:

- Increased emission limits from 2ppm to 5ppm for large boilers and heaters based on speculative reasons and generalizations;
- Long compliance timelines extending to 2034 that allow petroleum refineries to choose whether to comply with emission limits for various equipment;
- Startup, shutdown, and malfunction loopholes that allow petroleum refineries to avoid accountability and contravene federal law; and
- Emissions averaging times of 24-hours that allow petroleum refineries to hide large pollution releases into surrounding communities.

The South Coast AQMD has forced communities near petroleum refineries to wait for far too long for the installation of life-saving pollution controls. Additional delay just to produce a regulation that does not protect public health and conflicts with what the agency's technical analysis and law requires is unacceptable. The South Coast AQMD must resolve the deficiencies outlined above and finalize Refinery Rule 1109.1 by September 2021.

Sincerely,

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Jan Victor Andasan, Community Organizer
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