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February 22, 2023

Matt Davis, Program Manager
DEQ Cleaner Air Oregon
Lloyd 700 Building
700 NE Multnomah St #600
Portland, OR 97232-4100

Dear Mr. Davis:

Neighbors often smell foul odors that come from the tanks located here. Huge volumes of fuels and hazardous chemicals, including ammonia and chlorine, are transported in our neighborhoods by rail, tankers, and trucks and then trans-loaded to more than 500 active storage tanks. Emissions into the air from these sources put 200 oil industry workers' health at risk and affect the 1500 residents, often families with children, who live nearby.

Linnton Neighborhood Association (LNA) has attempted to resolve our concerns directly with DEQ Cleaner Air Oregon (CAO) about what appears to be incorrect reporting from CEI Hub industries: BP, Chevron, Equilon, Kinder Morgan, Phillips 66, Exxonmobil, Olympic Pipeline, McCall Oil (Shore Terminals/Nustar), and Arc Terminals to DEQ Cleaner Air Oregon.

The research we submitted to DEQ in March 2021 is also linked here:

<http://portlandcleanair.org/files/reports/Tank%20Farm%20v8%20web.pdf>

This report suggests that the four VOCs -- benzene, ethylbenzene, toluene, xylene(s) -- being emitted by internal floating roof gasoline tanks (IFRTs) and asphalt tanks at the CEI Hub are likely thirty times (30x) higher than what these industries are reporting to DEQ Cleaner Air Oregon. We understand the tank farm owners are reporting to CAO using AP-42, a formula written by the oil industry.

LNA asks DEQ to:

- 1) measure emissions from heated asphalt and heated residual oil tanks with EPA Method 204
- 2) conduct fence-line monitoring of IFRT tanks emissions of benzene, ethylbenzene, toluene, and xylene with EPA Method 325.

EPA investigated heated asphalt and #6 fuel oil tanks in New England, identical to those found in Linnton, starting in 2007, by measuring emissions. Those investigations found violations of the Clean Air Act which resulted in fines. AP-42 was found to be grossly inaccurate, underestimating emissions by as much as 59%. Maine and Massachusetts no longer permit it to be used to report emissions. Maine's DEP has adopted using EPA Methods 204 and 325.

LNA is troubled and disappointed that CAO is not requiring a reasonable attempt at accuracy from the CEI Hub industries for their Emission Inventories. AP-42 should not be allowed considering how grossly inaccurate it has been found to be in New England for the type of tanks identical to those found in Linnton.

The CAO prioritization process is to identify those industries that are probably posing the greatest risk to human health. This results in triggering a requirement for Source Testing; we support and agree with that process. We are not requesting that the CEI tank farms be called in ahead of other Portland-area industries that objectively pose greater risks to human health. However, if the CEI Hub industry emissions are likely significantly higher than being reported, this should be a factor in the prioritization.

In addition to the above requests initially submitted in 2021, Linnton NA requested that DEQ undertake summa canister testing. Isn't it the mission of DEQ CAO to assess and regulate industries' emissions and effects on human health? If the petrochemical odors we regularly smell at our houses are a "nuisance," but not a significant health threat, this would change our view.

Our above requests were rejected in 2021, 2022, and again this month, in 2023.

Since we do not have a reasonable resolution from DEQ, Linnton NA will address our concerns with a public campaign focused on DEQ's inaction. Linnton NA plans to begin this campaign to get accurate CEI Hub emissions testing and air quality testing by contacting and working with 56 Portland Neighborhood Associations, 16 Faith based groups, 9 local activist groups as well as over 20 other organizations that are concerned about the CEI Hub, with collective mailing lists well over 100k of Portland residents. We are asking each group to share the above information via their newsletters and social media posts so DEQ will reverse your position.

Sincerely,

Cedar Action
Cathy Spofford

Nancy Hiser
Linnton Neighborhood Association

Central Lutheran Church
Chris Bekemeier

Concordia Neighborhood Association
Peter Keller

Shawn Looney
Linnton Neighborhood Association

Extinction Rebellion
Diane Meissenhelter

First Congregational United Church of Christ
Kathryn Sheibley

Hayden Island Neighborhood Association
Martin Slapikas

Hayhurst Neighborhood Association
Kendall Kic

Kerns Neighborhood Association
Gretchen Hollands

King of Kings Lutheran Church
Kerin Lommen

Lincoln St United Methodist Church
Jeanie Barkett

Mt Scott-Arleta Neighborhood Association
Matchu Williams

N/NE AARP Portland Chapter 5264
Karen Wells

North Tabor Neighborhood Association
Robert Jordan
Portland Oregon Physicians for Social
Responsibility
Samantha Hernandez

Overlook Neighborhood Association
Ana Helena de Castro

P'Nai Or of Portland
Hilda Welch

Pearl District Neighborhood Association
Stan Penkin

Portland Clean Air/Cascadia Action
Greg Bourget

Portland Harbor Community Coalition
Cassie Cohen

Portsmouth Neighborhood Association
Neveen Hurd

Roseway Neighborhood Association
Chris Hansen

St Andrews Catholic Church
Tyler Wagner

St Andrews Episcopal Church
Nancy Whitmore

Trinity United Methodist Church
Kirk Bittler

University Park Neighborhood Association
Thomas Karwaki

Vernon Neighborhood Association
Christine Lailberte

Willamette Riverkeeper
Travis Williams

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Lynn Handlin