For 6/22 Public Scoping Meeting on Phillips 66 Marine Terminal Permit Revision Project

Comments by Ben Eichenberg, Staff Attorney for San Francisco Baykeeper

·      Marine Terminal Expansion is predicated on the completion of the Kinder Morgan pipeline to bring Canadian Tar Sands to the Bay Area = drastic increases in tar sands refining. Tar sands industry’s expansion plans rely on California’s refinery capacity. Current Canadian production of tar sands crude sits around 100,000 barrels per day, but that could increase to as much as 800,000 barrels per day in coming decades.[[1]](https://mg.mail.yahoo.com/neo/launch?.rand=bee3qfpi9t77h#_ftn1)

·      More than 2,000 additional barges and tankers carrying tar sands crude to and from refineries on the West Coast. Each tanker trip carries an added risk of a spill, as a reported 50% of large spills occur in open water.[[2]](https://mg.mail.yahoo.com/neo/launch?.rand=bee3qfpi9t77h#_ftn2) The majority of spills, however, are less than 200,000 gallons,[[3]](https://mg.mail.yahoo.com/neo/launch?.rand=bee3qfpi9t77h#_ftn3) and most of these spills happen while in port.

·      Two types of tanker will be used to transport tar sands crude to California refineries, coastal tankers, which can carry as much as 340,000 barrels of oil (14.3 million gallons), and coastal tank barges, which typically carry 50,000 to 185,000 barrels of oil, though newer models can carry as much as a coastal tanker.

·      Tar sands interaction with the marine environment is unknown, but according to a recent National Academy of Sciences report there are substantial differences in the chemical composition of tar sands and its behavior when released into the environment when compared to conventional crudes, which typically float. The bitumen portion of tar sands is often more dense than water, its adhesion is up to 100 times greater than conventional oils, when burned it creates “sticky” and “easily submerged” residues, and it does not quickly biodegrade, so the risk of long-term environmental impacts is especially high.

·      Even more concerning, the NAS found that approaches developed for addressing oil spills have been based on experiences with oils that float. Our first responders and government agencies are unprepared to confront this threat and lack the tools and technologies to even begin to do so.

·      For reference, the tar sands spill in the Kalamazoo that cost over a billion dollars, 5 years of cleanup -- and still isn’t cleaned up -- was 843,000 gallons of tar sands crude. Even the smallest tar sands barge would carry at least twice that amount,[[4]](https://mg.mail.yahoo.com/neo/launch?.rand=bee3qfpi9t77h#_ftn4) and marine cleanup is far more difficult than a confined riverbed.

[[1]](https://mg.mail.yahoo.com/neo/launch?.rand=bee3qfpi9t77h#_ftnref1) The Canadian Association of Petroleum Producers forecasts that tar sands production will increase by 700,000 bpd by 2030. By 2030 tar sands production is expected to grow by 1.5 million bpd, up to 3.7 million bpd. CAPP, 2016.

[[2]](https://mg.mail.yahoo.com/neo/launch?.rand=bee3qfpi9t77h#_ftnref2) The International Tanker Owners Pollution Federation (2016 spill statistics), p. 8.

[[3]](https://mg.mail.yahoo.com/neo/launch?.rand=bee3qfpi9t77h#_ftnref3) Approximately 184,000 gallons, or 700 tonnes.

[[4]](https://mg.mail.yahoo.com/neo/launch?.rand=bee3qfpi9t77h#_ftnref4) 2.15 million gallons.