From: **Reamer, Grady** Grady.Reamer@zenithterminals.com
Subject: Fwd: Zenith Aviation Fuel Receiving
Date: November 25, 2024 at 10:23 AM
To: Cassandra Jackson Cassandra.Jackson@portofportland.com

EXTERNAL EMAIL:

Sent from my iPhone

Begin forwarded message:

From: "Reamer, Grady" <Grady.Reamer@zenithterminals.com>
Date: November 20, 2024 at 4:22:00 PM CST
To: "Simpson, Andrea" <Andrea.Simpson@zenithterminals.com>
Subject: FW: Zenith Aviation Fuel Receiving

Do not share this email. See below and call me with questions.

We can bring jet across Chevron dock until we get situation resolved.

From: GRAIVER David * DEQ <David.GRAIVER@deq.oregon.gov>
Sent: Thursday, October 10, 2024 4:29 PM
To: Reamer, Grady <Grady.Reamer@zenithterminals.com>; Munguia, Carlos <Carlos.Munguia@zenithterminals.com>
Cc: BALL Lisa * DEQ <Lisa.Ball@deq.oregon.gov>
Subject: Zenith Aviation Fuel Receiving

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Carlos and Grady,
Zenith staff asked if the Type 1 NC application received by DEQ on July 19, 2023, would allow for conventional jet fuel to be unloaded from the associated rail car racks (Rack 1A, 1B, 2, and 3).
DEQ does not believe Zenith's October 2022 Land Use Compatibility Statement (LUCS) allows for conventional jet fuel to be unloaded from the rail car racks (Rack 1A, 1B, 2, and 3). Additionally, the blended sustainable aviation fuel is also unable to be unloaded or loaded through these racks because it doesn't meet the PCC definition of "renewable fuel".

- The October 3, 2022 LUCS states:
  - No new development or facilities for handling fossil fuels are proposed.
  - This LUCS is limited to (1) new or modified piping, headers, pumps, valves, racks, vapor combustion units etc. that require an Air Quality Notice of Construction and are needed to transload renewable fuels… and
  - As used above and in the Compliance Measures below, fossil fuels and renewable fuels are synonymous with the definitions of "fossil fuel" and "renewable fuel" in PCC 33.910.030 that was recently adopted in Ordinance 190978, with the understanding that renewable feedstocks (as defined by EPA) is considered a "renewable fuel."
- PCC 33.910.030 includes the following definitions
  - **Fossil Fuel.** Fossil fuels are petroleum products (such as crude oil and gasoline), coal, methanol, and gaseous fuels (such as natural gas and propane) that are made from decayed plants and animals that lived millions

of years ago and are used as a source of energy. Petroleum-based products used primarily for non-fuel uses (such as asphalt, plastics, lubricants, fertilizer, roofing, and paints) are not fossil fuels. See Renewable Fuel.
    - **Renewable Fuel.** Renewable fuels (such as biodiesel, biomethane, and clean hydrogen) are produced from non-petroleum, non-natural gas renewable resources and have less than 5 percent fossil fuel content.
- A US Department of Energy Document and discussions with Zenith staff indicate that "as used" sustainable aviation fuel (SAF) consists of a maximum of 50% renewable aviation fuel blended with conventional aviation fuel.
- Neither the "as used" SAF nor the conventional jet fuel meet the definition of "Renewable fuel" in PCC 33.910.030 because both have a content equal to or greater than 5 percent.
- Because these fuels are not "renewable fuels" the LUCS does not permit the handling of them in any new or modified piping, headers, pumps, valves, or racks.
- The classification and exemptions for "Bulk Fossil Fuel Terminal" in PCC 33.920.300 do not affect this decision.

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503-229-5690
Pronouns: He/Him/His
*Licensed in NE and OR