

Facts about Zenith Energy’s Plans to Expand

Continued Handling Of Fossil Fuels After Transition Off Crude Oil

Contrary to Zenith’s claim that it will transition to “exclusively handling renewable fuels and non-fuel products,” the proposed air permit would allow Zenith to continue increasing its handling of volatile refined fossil fuels such as low-sulfur diesel and av-gas, and potentially other fossil fuels that are not crude oil. Additionally, Zenith’s projections show that it plans to continue increasing crude oil throughput leading up to the 2027 transition off crude oil.

Increase In Harmful Pollution

According to Zenith’s recent [air permit application](#), several types of air pollution will *increase* after Zenith stops shipping crude oil. For example, volatile organic compound (VOC) emissions for rail and marine loading and unloading—where humans are often present for exposure—are projected to increase after the 2027 transition off crude.

	2022	After 2027
Track Loading	0.135 tons/year	2.04 tons/year
Marine Loading	2.71 tons/year	4.10 tons/year

(ACDP application: p. 3-4, Tables 3-6 and 3-7).

Future overall VOC emissions from the terminal are expected to significantly *exceed* what they were from 2019 to 2021—when Zenith was increasing its throughput, after assuring DEQ it would not. (Zenith Off Permit Change Notification, p. 1, #2)

	2019	2020	2021	Prior to 2027 (projected)	Post 2027 (projected)	Air Permit Limit (proposed)
VOC Annual Emissions (tons/year)	20.05	25.2	33	39.28	39.04	39

(2019-2021: from annual air reports to DEQ; Prior and Post 2027: ACDP application p.3-8, Table 3-10 and p.3-9, Table 3-11; ACDP Permit Limit: ACDP application p. 3-7)

Potential To Nearly Triple Greenhouse Gas Emissions

Zenith’s air pollution permit would allow a more than 2.5 times increase in anthropogenic greenhouse gas emissions compared to the projections before and after 2027.

	Prior to 2027	Post 2027	Permit Limit
Greenhouse gas emission (tons/year)	29,141	25,452	74,000

(From ACDP app—Permit limit: P.3-7; Prior to 2027: p. 3-8, Table 3-10; post 2027 p. 3-9, Table 3-11)

Increase In Throughput = Increase In Train, Truck, And Marine Traffic

Zenith's proposal will also significantly increase rail traffic through Portland, Vancouver, and the Columbia River Gorge. By 2027, the facility's overall throughput is projected to increase more than 2.5 times from what it was in 2022 and more than 5.5 times from 2019 numbers.

	2019	2022	Prior to 2027	Post 2027
Crude oil throughput (gallons/year)	167,215,847	346,411,936	359,848,994	0
Overall throughput (gallons/year)	167,215,847	374,016,958	834,187,586	966,632,814

(2022 numbers: pulled from Zenith Air Report to DEQ; Additional projections: ACCP Application p. 3-2, Table 3-3)

Addition Of Handling "Renewable" Naphtha—A Highly Volatile Fuel

Part of Zenith's plan is to begin shipping large volumes of "[renewable](#)" naphtha by rail, instead of crude oil—something that was not disclosed to the public when the City of Portland approved Zenith's most recent LUCS. In fact, Zenith is essentially planning a one-to-one transition from crude oil to "renewable" naphtha as well as the addition of other "renewable" fuels. "Renewable" naphtha and [crude oil](#) share many of the same risks to our environment and to public health and safety, including high flammability, aquatic risks, and harmful air pollution.

When compared to "[renewable](#)" diesel, "renewable" naphtha is more flammable, increasing the potential risk and consequences of explosions and flashbacks—events in which vapors are heavier than air and may spread near the ground, travel a considerable distance to a source of ignition and flash back. Additionally, renewable naphtha is toxic to aquatic life with long lasting effects. Bottom line: renewable naphtha presents an increased threat to our rivers and our environment, as well as an increased risk of accidents, spills, and explosions threatening the health and safety of our communities.

Expansion Of Operations

Zenith's 2022 LUCS application states, "No development, growth, or public facility investment is proposed in connection with this LUCS. Instead, operations at an existing facility will be modified to phase out crude oil." ([LUCS 22-182133 download p.39, policy 3.3](#)) This is clearly a false characterization of what Zenith really has planned.

Zenith's "renewable" fuels proposal opens the door for Zenith to expand its operations, including adding more pipelines, new rail unloading racks, future additional storage tanks, and the use of an additional dock—all to accommodate a massive increase in throughput. All of this results in increased threats to the environment and to communities all along the rail lines.