

Zenith Air Permit Talking Points



The Oregon Department of Environmental Quality (DEQ) just opened the [public comment period for Zenith's draft Air Contaminant Discharge Permit](#) (ACDP). This is the last permit Zenith needs to expand its dangerous fossil fuel facility in Northwest Portland.

DEQ is accepting public comments until June 15 at 5pm.

This is our moment to stand up and demand that DEQ protect us from Zenith Energy's plans to increase harm to our communities and our environment for years to come.

Here is what you need to know: Zenith convinced the City of Portland that it would transition to "renewable" fuels, many of which share the same dangers and risks of conventional fossil fuels. The reality is that Zenith is planning to significantly increase the amount of dangerous products moving through our communities.

Here is what you can do to stop Zenith:

- Attend the 5/12 in-person public hearing and rally
- Sign the petition
- Send additional written comments to DEQ by June 15, 2025 at 5 p.m.
 - By mail: NWR Air Quality Permit Coordinator, Oregon DEQ, 700 NE Multnomah St., Suite 600, Portland, OR 97232
 - By email: NWRAQPermits@deq.oregon.gov
 - By web: Your DEQ Online Public Notice

Tell DEQ to deny
Zenith's air permit
application.



Sign a short petition comment urging DEQ to deny Zenith's air permit application.

bit.ly/Zenith_Action



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Zenith's proposal will not reduce harm to our communities and the environment.

The actual emission and fuels throughput would likely increase from current levels. Zenith is attempting to mislead the public and regulators, again. The reality, revealed in the recent air pollution permit application, is that Zenith intends to:

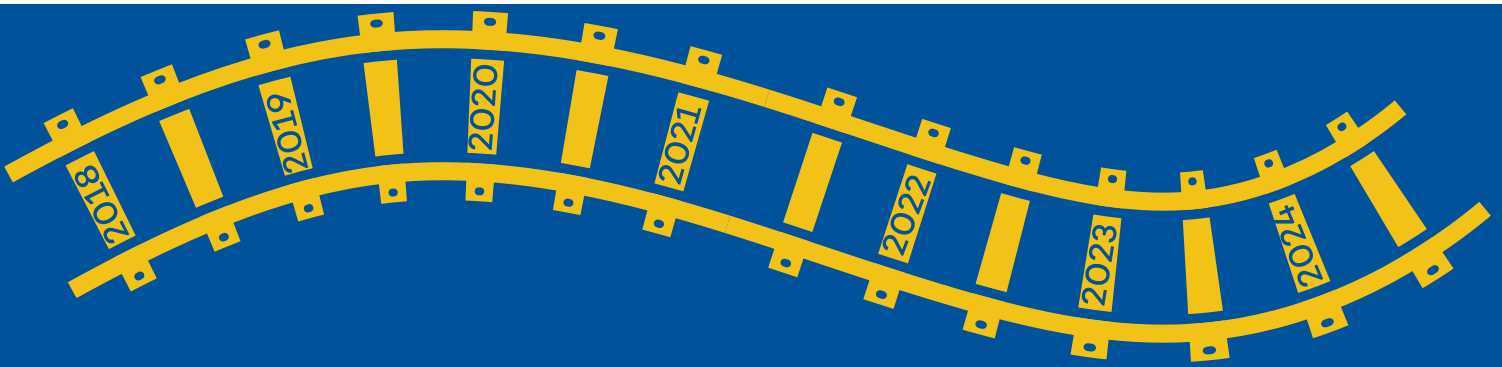
- Expand operations;
- Continue shipping fossil fuels after 2027;
- Begin handling significant quantities of dangerous "renewable" naphtha;
- Increase handling of Sustainable Aviation Fuel (SAF) and jet fuel;
- Potential to add the blending of SAF and jet fuel on site;
- Increase harmful air pollution in Portland; and
- Increase rail, truck, and marine traffic.

Zenith Poses a Serious Danger to Public Health, Safety, and the Environment

- Fossil fuel operations like Zenith pose serious health and safety risks to the communities where they operate. These risks include everything from the highly toxic and carcinogenic chemicals released during loading, transport, and unloading of the product, to the risk of train derailments that can cause deadly explosions and leave behind harmful residues.
- Frontline communities are already overburdened with pollution exposure.
- Zenith is located in a liquefaction zone. This means, if there is an earthquake, the ground beneath Zenith's tanks would liquify into the consistency of cake batter—an undesirable foundation for the millions of gallons of dangerous substances stored there. Zenith's operations are a potential catastrophe for the Willamette and Columbia Rivers.

Zenith's Long History of Violations and Lies

Zenith has uniquely dangerous operations and a track record of dishonesty. Throughout its time in operation, Zenith has failed to comply with important regulations. DEQ has identified roughly 20 violations by Zenith, ranging from failure to submit proper paperwork, to storing volatile fuels in the wrong tanks, to illegally expanding fossil fuel operations—leading to a \$372,600 fine from DEQ. In response, Zenith is trying to expand operations even further! Zenith cannot be trusted to handle more hazardous fuel and do so within the limits of an air permit.



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Broad Public Opposition to Zenith

- In 2021, 46 Portland neighborhood and community organizations, the Multnomah County Board of Commissioners, over 20 State Legislators, 19 environmental and public health organizations, Tribes, and thousands of Portland residents called, wrote, or emailed the Portland city government, urging for a denial of Zenith's city-level LUCS permit.
- Youth climate activists have made Zenith the focus of climate strike activities since 2019 and have called on Governor Kotek and DEQ to deny Zenith's ACDP.
- Since 2022, a coalition of roughly 30 neighborhood, river and environmental advocacy organizations have sponsored 22 (and counting) "Rumble on the River" community forums, attracting thousands of Portland residents to the series of free events to increase public awareness of the safety, health and seismic risks associated with Zenith Energy and the Critical Energy Infrastructure (CEI) Hub.

"Renewable" Fuels Are Still Dangerous

- Renewable fuels are often chemically similar to fossil fuels, creating the same risks for spills, accidents, explosions, and harmful emissions.
- 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.
- Renewable naphtha is toxic to aquatic life with long lasting effects.

Enforceability

- Zenith has three active Land Use Compatibility Statements that have been issued by the City of Portland, two of which are tied to the draft air permit.
- The City of Portland has not previously issued a Land Use Compatibility Statement with special conditions like it did for Zenith, bringing the issue of enforcement liability into question. This could create a situation in which the City is responsible for enforcement that it doesn't have capacity to perform.

City Permits Obtained Under False Pretenses

- The Portland City Auditor found Zenith violated lobbying rules while attempting to obtain a Land Use Compatibility Statement from the City.
- Zenith applied for City permits (Land Use Compatibility Statement and three pipes under Front Avenue) with the assurance that any new infrastructure would not be used to transport fossil fuels—while simultaneously illegally transporting fossil fuels through some of that infrastructure.



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Zenith is a Fossil Fuel Company Pushing to Further Expand Operations

- Reports filed with Oregon's DEQ in previous years show steady increases in fuel moved since 2019, despite Zenith's 2018 promise to Oregon regulators in its permit application that a planned expansion of its terminal would not lead to such an increase. Now Zenith wants to expand operations even more.
- After DEQ fined Zenith \$372,600 for illegal operations, Zenith responded by expanding its plans to incorporate additional handling of Sustainable Aviation Fuel (SAF) and the new use of blending fuel on site. This new LUCS is in contradiction to the 2022 LUCS. SAF does not meet the agreed upon definition of "renewable" fuels, as it must be blended with a minimum of 50% jet fuel—a fossil fuel.
- After promising to ditch crude oil, Zenith's air permit application shows that Zenith intends to expand its Portland, OR, terminal while continuing to handle fossil fuels. The amount of liquid fuels passing through the terminal (throughput) is projected to increase significantly, as it has since 2019—the year Zenith assured DEQ it would not increase throughput.
- 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 and the associated increase in train, truck, and marine traffic. All of this results in increased threats to the environment and to communities all along the transport routes.
- We know that the market will likely dictate the types of fuels that Zenith will handle. There do not appear to be any significant safeguards in place to prevent Zenith from increasing fossil fuel handling (aside from crude oil) rather than increasing "renewable" fuels.
- Despite Zenith's assurance it will transition to "renewable" fuels, [DEQ recently stated](#), "While the LUCS prohibits new fossil fuel infrastructure, there is nothing to prevent Zenith from increasing fossil fuel throughput from existing infrastructure on site as long as Zenith complies with all permit requirements."

Additional Resources: "Zenith History of Violations and Lies"

DEQ has the Authority to Stop Zenith's Expansion:

- DEQ has the legal authority to deny or revoke Zenith's air quality permit OAR 349-216-0082(5).
- DEQ should not issue or renew permits for companies like Zenith that have an extensive history of violations and a track-record of misleading regulators.

Sign a short petition comment urging DEQ to oppose Zenith's proposed air permit.

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