



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

## REQUEST FOR COMMENTS

May 26, 2015

TO: INTERESTED PARTIES  
FROM: EXECUTIVE OFFICER / APCO  
SUBJECT: **REQUEST FOR COMMENTS – PETROLEUM REFINERY  
EMISSIONS REDUCTION STRATEGY: INITIAL REPORT AND  
CONCEPT PAPERS**

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The Bay Area Air Quality Management District requests public review and comments on the Petroleum Refinery Emissions Reduction Strategy: Initial Report, Concept Papers and draft regulatory language. Comments relating to the draft proposals should be addressed to Greg Nudd, Manager, Rule Development Section, 939 Ellis Street, San Francisco, CA 94109. Comments may also be submitted by e-mail [GNudd@baaqmd.gov](mailto:GNudd@baaqmd.gov). **Comments are requested by close of business, Friday, June 19, 2015.**

### **BACKGROUND:**

The Air District is developing the Petroleum Refinery Emissions Reduction Strategy (or “Refinery Strategy”), which is intended to reduce emissions of criteria pollutants and their precursors (including sulfur dioxide (SO<sub>2</sub>), oxides of nitrogen (NO<sub>x</sub>), particulate matter, including fine particulates (PM<sub>2.5</sub>), organic gases, and toxic compounds) from the five Bay Area refineries and associated facilities. The Air District plans to accomplish these refinery emissions reductions by amending several Air District rules affecting petroleum refineries and developing additional rules aimed at specific refinery processes.

The Air District is moving these individual actions through the rulemaking process as a package. This enables the Air District to use its staff resources more efficiently and streamlines coordination and consultation with the public and the regulated community. There should be no inference that this approach results in dependencies between these rule actions. Each rulemaking action is independent from the others and will be individually evaluated according to the requirements of the California Health and Safety Code (H&SC).

The purpose of this concept paper and appendices (individual concept papers and draft rule language) is to inform the public and the regulated community of the Air District's plans for implementing the Refinery Strategy through rulemaking. In order to develop the best possible rules, Air District staff is soliciting feedback on our preliminary findings. Staff will consider input received in drafting the next iteration of the draft rules and accompanying workshop report. Those revised versions of the rules and associated documentation will then be published and discussed in public workshops. Staff will take the input from this workshop process and further revise the rules, as appropriate. The Air District will again publish the rules along with a detailed staff report prior to the public hearing where the Board of Directors considers whether to adopt the rules.

#### **COMMENTS AND FURTHER INFORMATION:**

The draft proposals are available on the Air District website at the following URL: <http://www.baaqmd.gov/Divisions/Planning-and-Research/Rule-Development/Rule-Workshops.aspx>. For additional information or to submit comments, please contact Greg Nudd, at (415) 749-4786 or via e-mail at [GNudd@baaqmd.gov](mailto:GNudd@baaqmd.gov). **Written comments, submitted by U.S. mail or electronic mail, are requested by close of business, Friday, June 19, 2015.**