



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

REQUEST FOR COMMENTS

January 28, 2015

TO: INTERESTED PARTIES
FROM: EXECUTIVE OFFICER / APCO
SUBJECT: **REQUEST FOR COMMENTS - DRAFT REGULATION 12, RULE 15: PETROLEUM REFINING EMISSIONS TRACKING AND DRAFT REGULATION 12, RULE 16: PETROLEUM REFINING EMISSIONS ANALYSIS, THRESHOLDS AND MITIGATION**

Bay Area Air Quality Management District staff requests public review and comments on draft **Regulation 12, Rule 15: Petroleum Refining Emissions Tracking** and draft **Regulation 12, Rule 16: Petroleum Refining Emissions Analysis, Thresholds and Mitigation**. Comments relating to the draft proposals should be addressed to Eric Stevenson, Director, Technical Services Division, 939 Ellis Street, San Francisco, CA 94109. Comments may also be submitted by e-mail ERStevenson@baaqmd.gov. **Comments are requested by close of business, Friday, February 27, 2015.**

BACKGROUND:

The Air District is developing two new rules that would affect the five Bay Area refineries. The first of the two proposals, draft Regulation 12, Rule 15: Petroleum Refining Emissions Tracking (Rule 12-15), would gather emissions inventory and crude slate information from the refiners and increase air monitoring activities at the refinery fence lines and in nearby communities. The proposed rule would put in place requirements to enhance the tracking of refinery emissions and crude composition over time. Tracking this information would allow the Air District to use emissions inventory data, crude oil information and air monitoring data to identify any potential relationship between emissions and crude oil quality. In addition, the rule would also require updated Health Risk Assessments (HRAs) be performed utilizing the latest methodology and health effects data to provide additional information regarding health risk from air emissions at refineries. Specifically, this rule would require Bay Area refineries to submit the following major elements:

- Report on-going annual emissions inventories of criteria pollutants, Toxic Air Contaminants (TACs) and Greenhouse Gases (GHG) based on upgraded methods, including emissions from refinery cargo carriers
- Establish a baseline Petroleum Refinery Emissions Profile (PREP), and require that on-going emissions inventories include comparisons with the PREP
- Report on-going crude oil characteristics with annual emissions inventories (e.g., sulfur and nitrogen content, API gravity, Total Acid Number)
- Update refinery-wide HRAs based on upgraded TAC emissions inventories and revised California EPA Office of Environmental Health Hazard Assessment (OEHHA) HRA guidelines
- Enhance fence line air monitoring systems and establish community air quality monitoring systems

The second proposal, draft Regulation 12, Rule 16: Petroleum Refining Emissions Analysis, Thresholds and Mitigation (Rule 12-16), complements Rule 12-15 and would require refiners to mitigate emissions increases of criteria pollutants and TACs above certain levels relative to the PREP. Mitigation would be implemented through an Emission Reduction Plan (ERP) that would be approved by the Air District. The ERP would detail how the refinery would reduce emissions of criteria pollutants to within 7.0 percent of above the baseline emission level established in the PREP and/or reduce TACs below site-specific triggers levels established by procedures contained in the rule.

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 Eric Stevenson, at (415) 749-4695 or via e-mail at ERStevenson@baaqmd.gov. **Written comments, submitted by U.S. mail or electronic mail, are requested by close of business, Friday, February 27, 2015.**