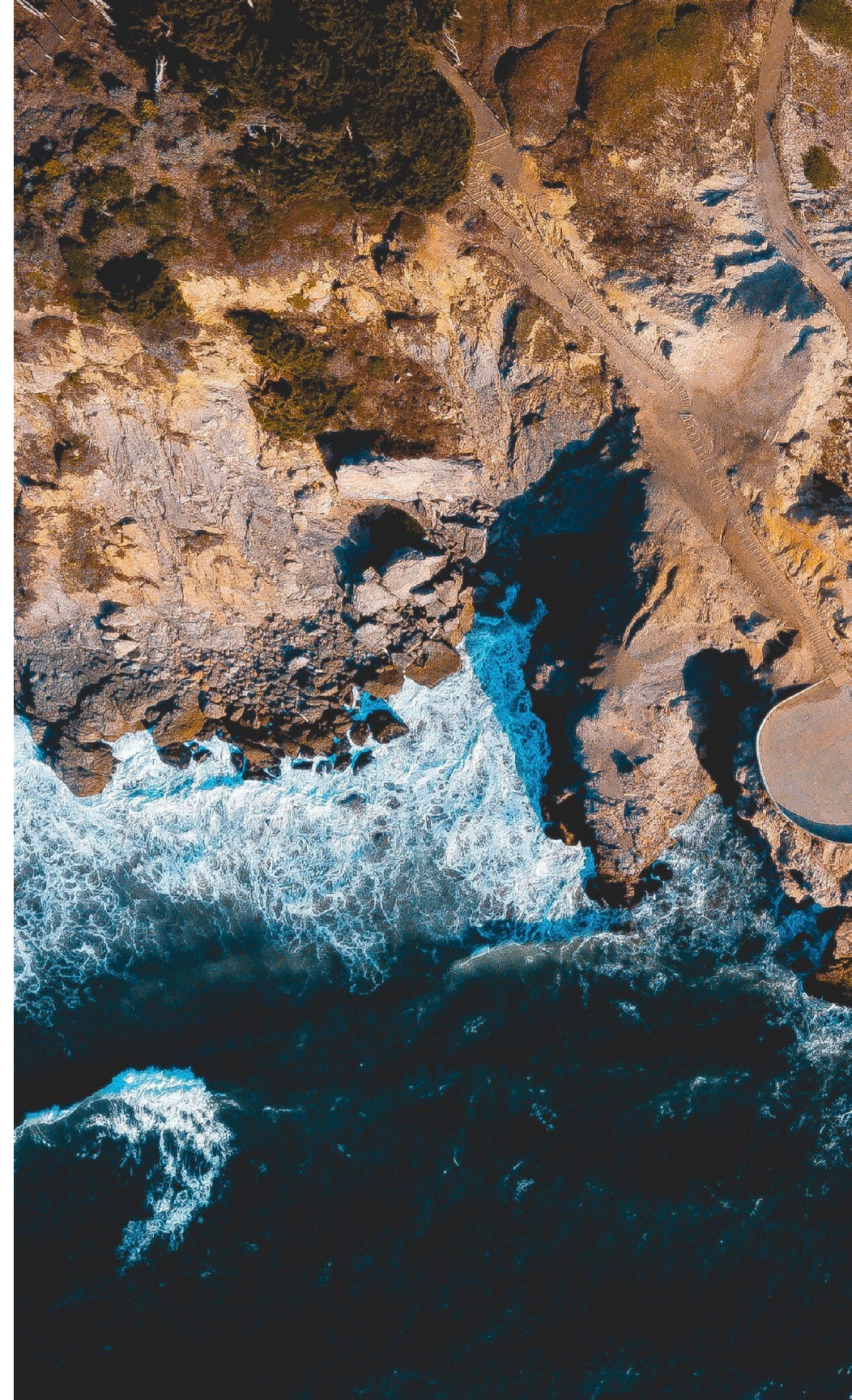




Refinery Technical Working Group Meeting #3

Thank you for joining. We will start at 5:30 pm.

October 29, 2025



Agenda

01

Welcome and Reflection

10 minutes

02

**Refinery Fenceline Air Monitoring Rule Development:
Process, Timeline & Opportunities for Engagement**

15 minutes

03

**Prioritization and Discussion of Fenceline
Monitoring Concepts**

90 minutes

04

Questions and Closing

5 minutes

Our Purpose & Participation Norms

RTWG Purpose

Forum for air quality-related matters at refineries and in refinery communities

Solicit stakeholder input on refinery-related rules such as:

- Rule 12-11: Flare Monitoring at Refineries
- Rule 12-12: Flares at Refineries
- Rule 12-15: Refining Emissions Tracking
- Potentially other refinery-related rules

Discuss technical aspects related to these rules

Build shared understanding on refinery flaring and related rules

Participation Norms

RTWG is a collaborative space for sharing perspectives. We will:

- Respect all voices; one speaker at a time; wait to be called on by the facilitator before speaking
- Avoid posturing or dominating discussion
- Input will inform—but not dictate—rule amendments
- Meetings will be in-person only

Reflection

Topics from the Last RTWG Meeting

August 27, 2025

- *Working group charter*
- *Flaring 101*

Air District staff appreciate the input they received from the group at meeting #2 on flaring and they will be working with the Communication and EJ divisions to produce a digestible end product to help educate the general public on what a flare is and what its purpose is when flaring occurs at Bay Area refineries. Air District staff will keep the RTWG updated on its progress and look forward to sharing "Flaring 101" soon.



Refinery Fenceline Air Monitoring Rule Development

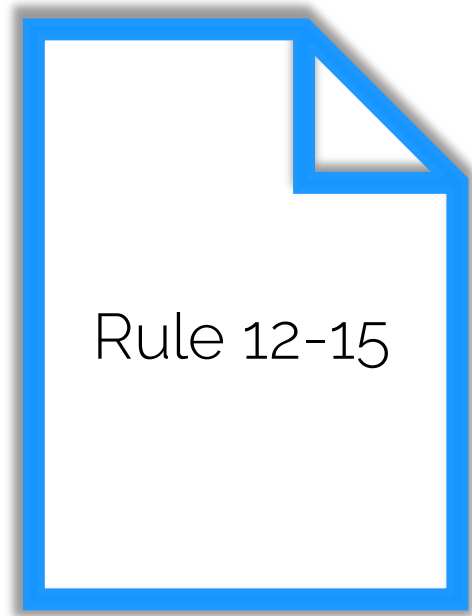
Process, Timeline & Opportunities for
Engagement



Overview of Air Monitoring Programs and Activities

Long-term Programs	Short Duration Projects	Incident Response
• Air District regulatory air monitoring • Refinery community air monitoring • Air District community air monitoring stations near refineries • Refinery fenceline air monitoring • Refinery ground level monitoring stations • Sensor networks or ongoing air monitoring programs conducted by communities or municipalities	• Air District community air quality investigations • Community-conducted air monitoring projects • Air monitoring by other agencies • Statewide Mobile Monitoring Initiative	• Particle Fallout Sampling Program for Refinery Communities

Air District Regulation 12, Rule 15



Adopted in 2016 to develop a more complete and accurate understanding of refinery emissions and the impacts of those emissions on surrounding communities by:

1. Quantifying air pollutant emissions from refinery-related sources
2. Tracking changes to a refinery's crude oil composition ("crude slate")
3. Requiring real-time monitoring of air pollutant concentrations at refinery fencelines

Refinery Fenceline Air Monitoring Objectives

Provide measurements of various air pollutant concentrations in real time and in short enough time scales (e.g., 5-minute averages) to identify and address significant changes in emissions from facility operations (e.g., due to leaks)

Track long-term pollutant levels, variations, and trends over time at or near refinery property boundaries

Current Fenceline Air Monitoring Requirements for Refineries

Obtain and maintain Air District approval of a plan for establishing and operating a fenceline monitoring system



Operate in accordance with the approved plan

Required Contents of a Fenceline Air Monitoring Plan

- Description of equipment used to monitor, record, and report air pollutant concentrations
- Justification for the pollutants to be monitored
- Description of the siting, operation, and maintenance of the equipment
- Analysis of meteorological data to support equipment coverage and siting decisions
- Procedures for implementing and documenting quality assurance and quality control measures including demonstrating the performance of the monitors and validating the collected data (Quality Assurance Project Plan)

Motivation for Revising the Refinery Fenceline Air Monitoring Requirements

In the more than 9 years that have passed since Rule 12-15 was originally adopted, much has changed...

➡ Air District's and public's needs for timely and accurate information, and what is necessary for a feasible and adequate fenceline monitoring program that delivers on those needs

- Implementation experience
- 2022 Earthjustice Report

➡ Regulatory landscape

- AB 1647
- SB 674
 - Expand applicability to additional facilities
 - Expand target pollutant list
 - Public notifications, root cause analyses & corrective action
 - Third party audits
- South Coast Rule 1180 and San Joaquin Valley Rule 4460

Rule Development Timeline & Opportunities for Engagement

Early Engagement Now – Early 2026

- Discussion of rule concepts and priorities with stakeholder groups
- Issuance of a public notice to seek written comments on rule concepts

Draft Rule Spring 2026

- Presentation to the Stationary Source Committee
- Release of draft rule and staff report for public review (~45 days)
- Public workshops (one in person, one virtual)

Proposed Rule Fall-Winter 2026

- Presentation to the Stationary Source Committee
- Release of proposed rule and staff report for public review prior to consideration by the Board of Directors
- Public hearing when the rule is considered by the Board of Directors

Other Potential Changes to Rule 12-15

When the Air District opens Rule 12-15 to address fenceline air monitoring improvements, we may also consider making other changes to the rule:

1. Improve consistency with statewide requirements by removing the emissions inventory requirements from the rule and relying on CARB's *Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants* (CTR Regulation) and CARB's *Regulation for the Mandatory Reporting of Greenhouse Gas Emissions* (MRR)
2. Removing the crude slate reporting requirements from the rule and relying on other more effective means to achieve the intended purpose of tracking changes in facility emissions.

If you have concerns about either of these potential actions, want to know more, or want to discuss them in more detail, please contact Greg Nudd (gnudd@baaqmd.gov).

Questions:

Refinery Fenceline Air Monitoring Rule Development

Process, Timeline & Opportunities for
Engagement



let's shift by 6 pm (latest)

Prioritization and Discussion of Fenceline Monitoring Concepts



Goals for Today's Discussion

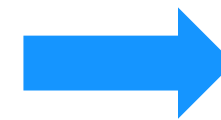
Understand the diverse perspectives and priorities of the Refinery Technical Working Group members about refinery fenceline air monitoring

Capture feedback in a structured way:

- Identifies areas of alignment and divergence among stakeholder groups
- Provides actionable insights to guide development of a more effective and balanced fenceline air monitoring rule

Prioritization of fenceline monitoring concepts
(building on pre-meeting questionnaire)

~ 20 minutes



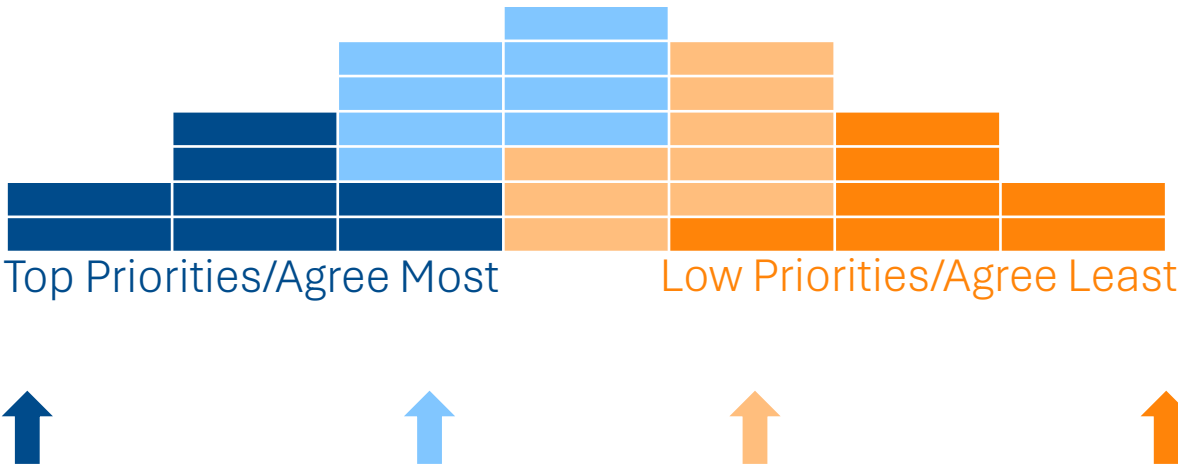
Discussion

~ 70 minutes

Prioritization Process

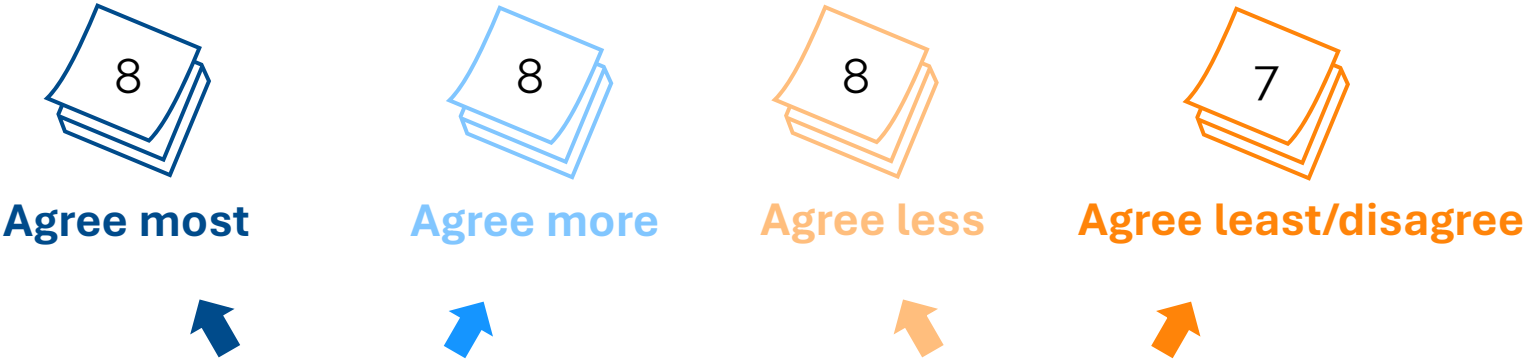
Step 4

Arrange the statements in the shape of the grid by placing the statements you agree with the most to the left and the those you agree with the least (or disagree with) to the right.



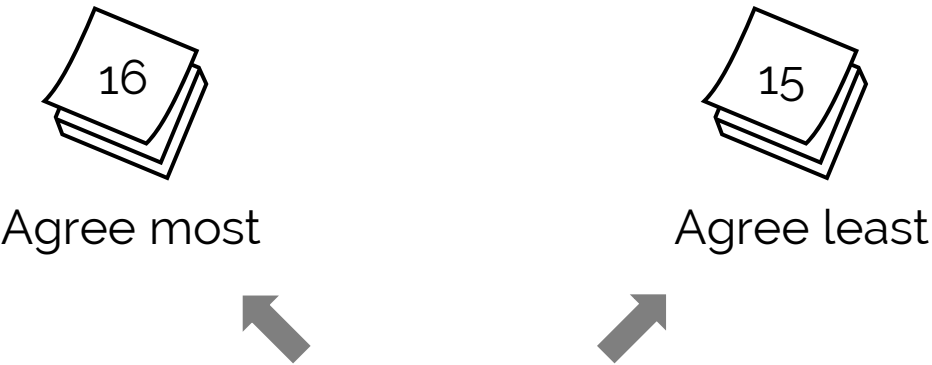
Step 3

Divide each stack again, based on the degree of agreement



Step 2

Divide the statements into two groups of roughly equal size – those you agree with the most and those you agree with the least



Step 1

Read the statements without sorting them to get a sense of the ideas being presented

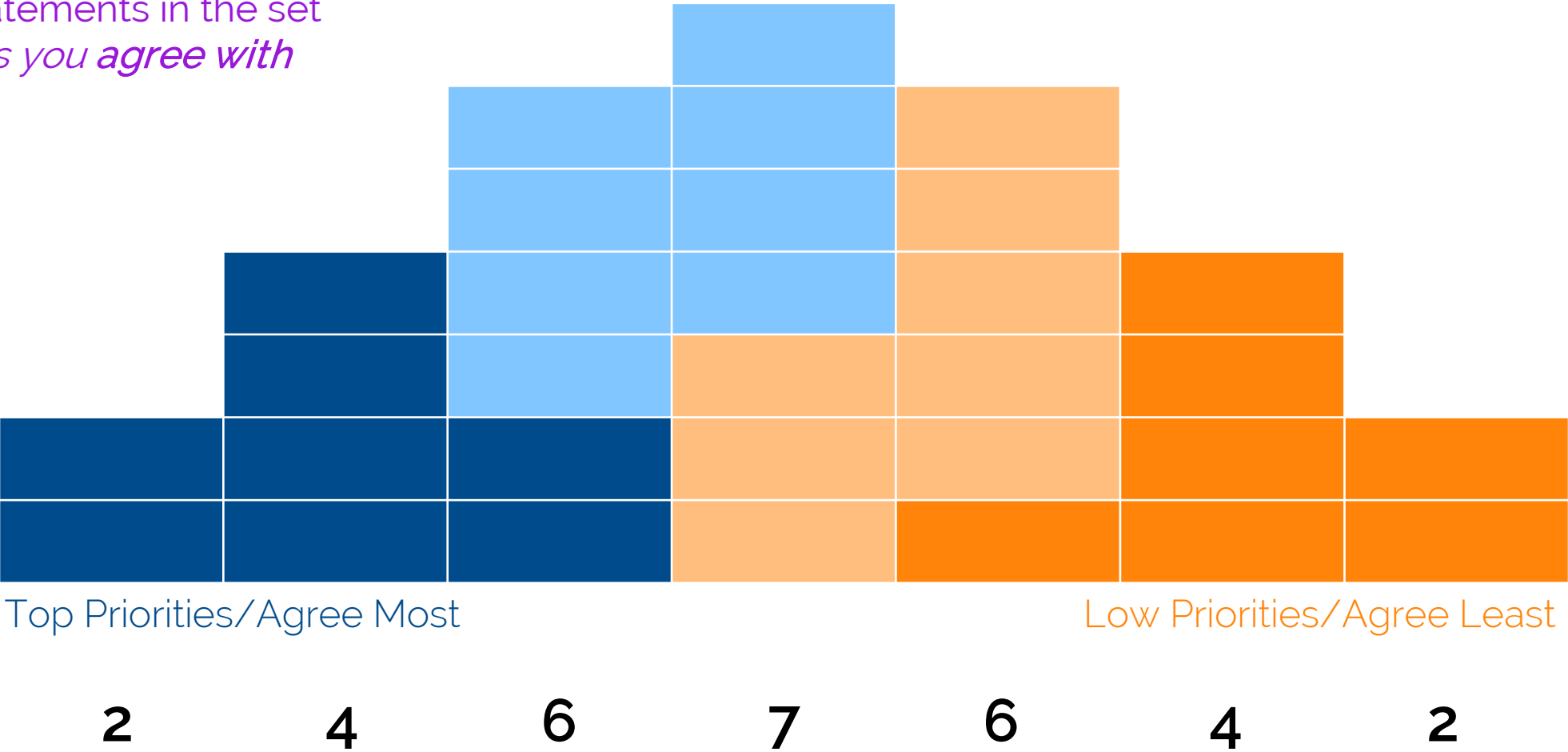


Prioritization Matrix

There are no right nor wrong answers – this is about your perspective.

It is possible that you may agree with all of the statements or that you may disagree with all of them. However, *remember that you are being asked to rank all of the statements in the set relative to each other (i.e., identify which ones you agree with the most and agree with the least).*

Go with your initial reactions; if a statement feels hard to place, do your best to put it in the group that feels most appropriate for now.



Discussion

1. What statements did you agree with the most or consider most important (statements furthest left)? Why?
2. What statements did you agree with the least or consider least important (statements furthest right)? Why?
3. Are there any statements you ranked lower even though you still consider them important? What influenced your ranking?
4. Do you see any connections or tradeoffs among the statements you ranked as most or least important?

Discussion

1. Beyond your most or least important statements, why did you place certain statements in the middle?
2. Are there any statements that might be hard to implement in practice? Please explain.
3. When thinking about a new fenceline air monitoring rule, are there any important concepts or ideas that are not reflected in any of the statements you read? What are they and why are they important to you?
4. Are there procedural or logistical issues the Air District should consider in order to make implementation of the refinery fenceline air monitoring rule more practical?
5. What kind of oversight or accountability mechanisms would help ensure that the rule is implemented properly and effectively over time?
6. What else is important to you about this rule that you would like to discuss?

Questions:

**Prioritization and Discussion of
Fenceline Monitoring Concepts**

Contact Joseph Lapka:
jlapka@baaqmd.gov



let's shift by 7:25pm (latest)

Next Meeting

January 2026
5:30 - 7:30 pm



June 25, 2025	Aug. 27, 2025	Oct. 29, 2025	January 2026
RTWG Initiated Background on Rules 12-11 and 12-12	Charter & Flaring 101	Improvements to Refinery Fenceline Air Monitoring Requirements	Flare Rule Amendment Concepts

Questions



Thank you for joining the Refinery TWG Meeting #3!

Next Meeting:

- January 2026
 - Staff Contact
ruledevelopment@baaqmd.gov
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