



Thank you for joining the  
Refinery Technical  
Working Group – Meeting  
#4!

We still start at 5:30pm

**Refinery Technical Working Group – Meeting #4**

*February 11, 2026*



# Agenda

1	Welcome, Introductions, & Reflection	~15 minutes
2	Potential Rule Amendment Concepts for Rules 12-11 and 12-2 — Goal #1	~30 minutes
3	Potential Rule Amendment Concepts for Rules 12-11 and 12-2 — Goal #2	~65 minutes
4	Closing	~5 minutes

# Our Purpose & Participation Norms

## RTWG Purpose

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

**Solicit stakeholder inputs 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 Rule
- 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

# Welcome & Introductions





# Reflecting on our Last RTW/G Meetings

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# RTW/G Meetings to Date

1

June 25, 2025

**RTW/G Initiated  
Background on Rules  
12-11 and 12-12**

2

Aug. 27, 2025

**Charter & Flaring 101**

**How input is being used:** RTW/G input is informing development of the Flaring 101 educational materials, alongside internal technical review, with additional community input planned through AB 617 partners to ensure the materials are clear, accurate, and useful for the community.

3

Oct. 29, 2025

**Improvements to Refinery Fenceline  
Air Monitoring Requirements**

**How input is being used:** RTW/G meeting input is informing the development of a concept paper outlining potential rule requirements and questions for public comment and is helping identify topics for future workshops.

# Rules 12-11 and 12-12 Potential Amendment Concepts



# Goals for Potential Amendment Concepts

## Goal #1

Streamline the Flare Minimization Plan Update Process and Improve the Reporting and Monitoring Requirements

## Goal #2

Reduce Flaring Emissions and Frequency



# Goal #1

**Streamline the Flare**

**Minimization Updates and**

**Strengthen the Reporting and**

**Monitoring Requirements**



# **Goal #1 - Streamline the Flare Minimization Updates and Strengthen the Reporting and Monitoring Requirements**

- 1.1. Strengthen and Streamline Flare Minimization Plan Updates**
- 1.2. Amend the Reporting Requirements for Improved Data Consistency and Accessibility**
- 1.3. Improve and Expand Definitions and Categories for Reporting Causes of Flaring**
- 1.4. Strengthen the Monitoring and Reporting Requirements**

# 1.1. Strengthen and Streamline Flare Minimization Plan Updates

## Description:

- Potential Concept: Submission of a Flare Minimization Plan (FMP) only when the facility exceed the rule limits or other metric
  - An updated FMP could include mitigation measures
- Current: Current rule requires annual update (not based on triggers)

## Impacts:

- Increase enforceability of rule requirements
- Resource savings for the Air District and regulated facilities

# 1.2. Amend the Reporting Requirements for Improved Data Consistency & Accessibility

## Description:

- Amend the reporting and content requirements for causal and flaring reports to improve data consistency and accessibility
- Evaluating:
  - Use of standardized report templates
  - Causal categorization system
  - Prescribed emissions calculation methodologies

## Impacts:

- Increase data integrity and accessibility
- Resource savings for the Air District and regulated facilities



# 1.3. Improve and Expand Definitions and Categories for Reporting Causes of Flaring

## Types of Flaring under Current Rule 12-12

### Emergency Flaring

Flaring due to condition at a refinery beyond reasonable control.

### Non-emergency Flaring

Flaring due to condition that does not meet the definition of Emergency – including both Unplanned and Planned Flaring

### Emergency Flaring Definition from Rule 12-12

*A condition at a refinery beyond the reasonable control of the owner or operator requiring immediate corrective action to restore normal operation that is caused by a sudden, infrequent and not reasonably preventable equipment failure, natural disaster, act of war or terrorism or external power curtailment, excluding power curtailment due to an interruptible power service agreement from a utility.*

# 1.3. Improve and Expand Definitions and Categories for Reporting Causes of Flaring

## Description:

- Revise existing definitions and add new definitions related to causes of flaring to provide greater clarity
- Evaluating:
  - Revising definitions for Emergency
  - Adding new definitions for Malfunction, Planned Flare Event, and Unplanned Flare Event

## Impacts:

- Improve clarity and consistency in defining the causes of flaring
- Stronger enforceability with clearer interpretation of requirements

# 1.4. Strengthen the Monitoring and Reporting Requirements

## Description:

- Update monitoring and reporting requirements to enhance emissions tracking and improve the enforceability of key flare operational parameters
- Evaluating the following changes:
  - Requiring continuous measurement of total sulfur
  - Review and approval process for causal reports and flare monitoring systems
  - Require online submittal of video monitoring data

## Impacts:

- Increase accuracy and integrity of emissions data
- Support stronger compliance assurance and enforcement

# Discussion

**Goal #1: Streamline the Flare  
Minimization Updates and Strengthen  
the Reporting and Monitoring  
Requirements**

*What general reactions, observations, or  
questions would you like to share?*

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# Goal #2

Reduce Flaring Emissions and  
Frequency



# Goal #2 - Reduce Flaring Emissions and Frequency

- 2.1. Incorporate key requirements from the EPA's Refinery Sector Rule
- 2.2. Establish new annual flare limits
- 2.3. Establish requirement for implementation of emissions reduction measures for emission exceedances
- 2.4. Establish mitigation fee for emission exceedances
- Pause for Discussion --
- 2.5. Require submittal of causal reports based on additional triggers
- 2.6. Require third-party audits for facilities

## 2.1. Incorporate Key Requirements from EPA's Refinery Sector Rule for Flares

### Description:

- Incorporate requirements related to destruction efficiency and smokeless capacity into the rule, such as minimum net heating value, flare tip velocity and smokeless capacity requirements
- Similar requirements are present in flare rule in South Coast AQMD
- Federal Regulation already requires monitoring of these key parameters
- Evaluating to require the reporting of these key parameters in the rule

### Impacts:

- Increase enforceability of key operating requirements from Federal Regulation

## 2.2. Establish New Annual Flare Limits

### Description:

- Establish annual limits that deter and reduce flaring
  - Similar requirements are present in flare rule in South Coast AQMD
- Evaluating:
  - Annual emission limits
  - Annual volumetric vent gas limit
  - Declining annual emission limit over time
  - Application of the limit to emergency and non-emergency flaring
  - Differentiating non-hydrogen and hydrogen flares
  - Historical Rule 12-11 emissions data and Rule 12-12 causal reports

### Impacts:

- Reduce emissions and decreased frequency of flaring



## 2.3. Require Emissions Reduction Measures for Emission Exceedances

### Description:

- Require implement emission reduction measures when emission exceedance occurs
- Require a detailed evaluation of potential emission reduction measures
- Evaluating more stringent emissions reduction measures greater the exceedances

### Impacts:

- Reduce emissions and decreased frequency of flaring

## 2.4. Establish Fee for Emission Exceedances

### Description:

- Require facilities to pay a fee when an emission limit exceedance occurs
- Provisions that impose mitigation fee are present in flare rule in South Coast AQMD
- Evaluating higher fee for greater exceedances

### Impacts:

- Reduce emissions and decreased frequency of flaring

# Discussion

## Goal #2: Reduce Flaring Emissions and Frequency (Part 1)

*What general reactions, observations, or questions would you like to share?*



## 2.5. Require Submittal of Causal Reports based on Additional Triggers

### Description:

- Require submittal of causal report for flares when based on other triggering criteria
- Evaluating:
  - Other scenarios where causal reports may be warranted
  - Requiring submittal when visible emission limits or flare tip velocity limits are exceeded

### Impacts:

- Decrease the frequency of specific flaring event related to these triggers
- Expand the existing reporting requirements



# 2.6. Require of Third-Party Audits for Facilities

## Description:

- Requiring of third-party audits to facilities to verify compliance
- Third-party audits have been routinely required under EPA Consent Decrees
- Audit triggers under evaluation:
  - Recurrent flaring from the same source/process area within a specified timeframe
  - Emergency flaring that exceed certain emission or vent gas volume threshold
  - Air District determination that internal audits are insufficient

## Impacts:

- Reduce emissions and decreased frequency of flaring

# Discussion

## Goal #2: Reduce Flaring Emissions and Frequency (Part 2)

*What general reactions, observations, or questions would you like to share?*



# Closing & Next Steps

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# Next Steps

*The Air District will take input today into consideration as the concept paper for Rules 12-11 and 12-12 is drafted; there will be a public comment period and public workshop.*

# Next Meeting: TBD

*We have a short exit survey for you to share topics you'd like the RTWG to cover, meeting preferences, and timing of our next and upcoming meetings.*



# Questions?

# Thank you for joining the Refinery TWG Meeting #4!

## Next Meeting:

- TBD
  - Staff Contact  
[ruledevelopment@baaqmd.gov](mailto:ruledevelopment@baaqmd.gov)
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