

## Summary of Current Proposed Revisions to Petroleum Refinery Emissions Inventory Guidelines (version published July 2019)

Affected Section(s)	Revision	Rational
Title Page	Update version date and reviewer information	
Entire document	Remove references to cargo carriers	Alignment with December 19, 2018 revisions to Regulation 12, Rule 15
Entire document	Add “support facility” after petroleum refinery or “support facilities” after petroleum refineries  Revise “Refinery-wide” to “Facility-wide”	Account that both petroleum refineries and their support facilities use the guidelines
Section 3.13.7 (Contractor Operations)	<p>Add the following text:</p> <p>“Emissions occurring from stationary sources that are temporarily located on site to perform tasks at refineries, but are permitted to other entities are not required to be estimated unless those emissions were estimated and included in a previous emissions inventory for the facility. If a facility has questions regarding what emissions may have been previously estimated and included in a previous emissions inventory, the facility should contact the Air District.</p> <p>However, emissions occurring from stationary sources permitted to a petroleum refinery or support facility that result from the use of temporarily-located stationary sources permitted to other entities are required to be estimated.”</p> <p><i>“Example</i></p> <p>During the course of the year, a petroleum refinery degassed and cleaned a stationary storage tank permitted to the petroleum refinery. Prior to cleaning, a natural gas-fired thermal oxidizer permitted to a third party was brought onsite to abate emissions from the stationary storage tank. Emissions from this thermal oxidizer have never been included in a previous emissions inventory for the petroleum refinery. In this case, emissions generated from combusting of supplemental natural gas at the thermal oxidizer are not required to be estimated. However, emissions generated by the storage tank should be estimated per the methodologies and procedures described in the preceding sections.”</p>	Clarifying that emissions from third-party permitted stationary sources that are temporarily located onsite a petroleum refinery or support facility is not required to be estimated, unless included within a petroleum refinery or support facility’s previous emissions inventory.
Section 10 (Guidelines Revision Procedure)	<p>Revise Section 10.2.1 through Section 10.2.4 text to the following:</p> <p><b>“Section 10.2.1 – Identification of Proposed Revision</b></p> <p>A proposed revision to these Guidelines may be identified by either:</p> <ul style="list-style-type: none"> <li>• District personnel,</li> <li>• Formal request by an interested stakeholder, or</li> <li>• A scheduled review by the District occurring at least once every five years.</li> </ul> <p>Formal requests by stakeholders should be in written form directed to the Engineering Division and should:</p> <ul style="list-style-type: none"> <li>• identify the proposed revision,</li> <li>• explain why the revision is appropriate, and</li> <li>• include suggested revised text.</li> </ul> <p>The District will review any formal requests for revision and determine whether the steps in Section 10.2 should be followed to revise the Guidelines.</p>	Alignment with December 19, 2018 revisions to Regulation 12, Rule 15 and general process streamlining.

## Summary of Current Proposed Revisions to Petroleum Refinery Emissions Inventory Guidelines (version published July 2019)

	<p><b>Section 10.2.2 – Notification of Interested Stakeholders</b></p> <p>If the District determines a Guidelines revision is warranted, the District will notify interested stakeholders that a revision is appropriate and will:</p> <ul style="list-style-type: none"><li>• identify the pertinent section(s) of the Guidelines proposed for revision;</li><li>• explain the reason for the proposed revision. This explanation may group proposed changes in categories as appropriate;</li><li>• include proposed Guidelines language change; and</li><li>• request comments on the proposed revision.</li></ul> <p><b>Section 10.2.3 – Comment Review</b></p> <p>After the close of the comment period (presumptively 60 calendar days), the District will consider all comments received and, as appropriate, revise the proposed Guidelines text and respond to comments received.</p> <p><b>Section 10.2.4 – Publication of Revised Guidelines</b></p> <p>Once the guidelines have been revised, the District will publish the Guidelines on the District's website.”</p> <p>Deleted Section 10.2.5</p>	
--	--	--

History of prior revisions to the Guidelines:

July 2019 – Incorporated changes in Guidelines Sections 2, 3, 5, and Appendix A as negotiated in Settlement, Enforcement and Release Agreement dated March 4, 2019 resolving litigation *WSPA, et al. v. Air District*, case no. N17-2300.

May 2017 – Incorporated changes in Guidelines Sections 2, 3, 5, 6, 7, 8, and the appendices following discussions with the Bay Area petroleum refineries and Western States Petroleum Association.