



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

BOARD OF DIRECTORS  
STATIONARY SOURCE COMMITTEE

COMMITTEE MEMBERS

ROD SINKS - CHAIR  
JOHN BAUTERS  
JOHN GIOIA  
NATE MILEY  
JIM SPERING  
SHIRLEE ZANE

KAREN MITCHOFF – VICE CHAIR  
DAVID CANEPA  
CAROLE GROOM  
MARK ROSS  
BRAD WAGENKNECHT

MONDAY  
JULY 8, 2019  
9:30 A.M.

1<sup>ST</sup> FLOOR BOARD ROOM  
375 BEALE STREET  
SAN FRANCISCO, CA 94105

VIDEO CONFERENCE LOCATION  
SANTA ROSA JUNIOR COLLEGE  
DOYLE LIBRARY, ROOM 4248  
1501 MENDOCINO AVENUE  
SANTA ROSA, CA 95401

AGENDA

1. **CALL TO ORDER - ROLL CALL**  
**PLEDGE OF ALLEGIANCE**  
**PUBLIC MEETING PROCEDURE**

*The Committee Chair shall call the meeting to order and the Clerk of the Boards shall take roll of the Committee members. The Committee Chair shall lead the Pledge of Allegiance.*

*This meeting will be webcast. To see the webcast, please visit [www.baaqmd.gov/bodagendas](http://www.baaqmd.gov/bodagendas) at the time of the meeting. Closed captioning may contain errors and omissions, and are not certified for their content or form.*

**Public Comment on Agenda Items** *The public may comment on each item on the agenda as the item is taken up. Public Comment Cards for items on the agenda must be submitted in person to the Clerk of the Boards at the location of the meeting and prior to the Board taking up the particular item. Where an item was moved from the Consent Calendar to an Action item, no speaker who has already spoken on that item will be entitled to speak to that item again.*

2. **PUBLIC COMMENT ON NON-AGENDA MATTERS**

**Public Comment on Non-Agenda Items, Pursuant to Government Code Section 54954.3** *For the first round of public comment on non-agenda matters at the beginning of the agenda, ten persons selected by a drawing by the Clerk of the Boards from among the Public Comment Cards indicating they wish to speak on matters not on the agenda for the meeting will have two minutes each to address the Board on matters not on the agenda. For this first round of public comments on non-agenda matters, all Public Comment Cards must be submitted in person to the Clerk of the Board at the location of the meeting and prior to commencement of the meeting.*

Staff/Phone (415) 749-

3. **APPROVAL OF THE MINUTES OF APRIL 29, 2019**

Clerk of the Boards/5073

*The Committee will consider approving the draft minutes of the Stationary Source Committee meeting of April 29, 2019.*

4. **UPDATE ON REGIONAL AND LOCAL ASSESSMENTS OF PARTICULATE MATTER**

J. Broadbent/5052

[jbroadbent@baaqmd.gov](mailto:jbroadbent@baaqmd.gov)

*The Committee will receive an update on progress and challenges in assessing what air pollution sources drive exposure to particulate matter in the Bay Area, both for the region and in communities most impacted by air pollution.*

5. **UPDATE ON THE IMPLEMENTATION OF REGULATION 11, RULE 18 (RULE 11-18): REDUCTION OF RISK FROM AIR TOXIC EMISSIONS AT EXISTING FACILITIES**

J. Broadbent/5052

[jbroadbent@baaqmd.gov](mailto:jbroadbent@baaqmd.gov)

*The Committee will receive an update of the Air District's implementation Rule 11-18, Reduction of Risk from Air Toxic Emissions at Existing Facilities. The topic will include a review of the rule requirements and a discussion of the implementation status for the Phase I facilities.*

6. **UPDATE ON RULE DEVELOPMENT FOR AMENDMENTS TO REGULATION 12, RULE 15 (RULE 12-15): PETROLEUM REFINERY EMISSIONS TRACKING RULE**

J. Broadbent/5052

[jbroadbent@baaqmd.gov](mailto:jbroadbent@baaqmd.gov)

*The Committee will receive an update and a briefing on the necessity of the Air District's rule development efforts currently underway to revise reporting deadlines in the regulation to align with recently adopted Assembly Bill (AB) 617 Criteria and Toxics Reporting Regulation and existing Regulation for the Mandatory Reporting of Greenhouse Gas Emissions.*

7. **PUBLIC COMMENT ON NON-AGENDA MATTERS**

*Speakers who did not have the opportunity to address the Board in the first round of comments on non-agenda matters will be allowed two minutes each to address the Board on non-agenda matters.*

8. **COMMITTEE MEMBER COMMENTS**

*Any member of the Board, or its staff, on his or her own initiative or in response to questions posed by the public, may: ask a question for clarification, make a brief announcement or report on his or her own activities, provide a reference to staff regarding factual information, request staff to report back at a subsequent meeting concerning any matter or take action to direct staff to place a matter of business on a future agenda. (Gov't Code § 54954.2)*

9. **TIME AND PLACE OF NEXT MEETING**

*Monday, September 16, 2019, location to be determined.*

10. **ADJOURNMENT**

*The Committee meeting shall be adjourned by the Committee Chair.*

**CONTACT:**

**MANAGER, EXECUTIVE OPERATIONS**  
**375 BEALE STREET, SAN FRANCISCO, CA 94105**

[vjohnson@baaqmd.gov](mailto:vjohnson@baaqmd.gov)

**(415) 749-4941**  
**FAX: (415) 928-8560**  
**BAAQMD homepage:**  
[www.baaqmd.gov](http://www.baaqmd.gov)

- To submit written comments on an agenda item in advance of the meeting. Please note that all correspondence must be addressed to the “Stationary Source Committee” and received at least 24 hours prior, excluding weekends and holidays, in order to be presented at that Board meeting. Any correspondence received after that time will be presented to the Board at the following meeting.
- To request, in advance of the meeting, to be placed on the list to testify on an agenda item.
- Any writing relating to an open session item on this Agenda that is distributed to all, or a majority of all, members of the body to which this Agenda relates shall be made available at the District’s offices at 375 Beale Street, Suite 600, San Francisco, CA 94105, at the time such writing is made available to all, or a majority of all, members of that body.

**Accessibility and Non-Discrimination Policy**

The Bay Area Air Quality Management District (Air District) does not discriminate on the basis of race, national origin, ethnic group identification, ancestry, religion, age, sex, sexual orientation, gender identity, gender expression, color, genetic information, medical condition, or mental or physical disability, or any other attribute or belief protected by law.

It is the Air District’s policy to provide fair and equal access to the benefits of a program or activity administered by Air District. The Air District will not tolerate discrimination against any person(s) seeking to participate in, or receive the benefits of, any program or activity offered or conducted by the Air District. Members of the public who believe they or others were unlawfully denied full and equal access to an Air District program or activity may file a discrimination complaint under this policy. This non-discrimination policy also applies to other people or entities affiliated with Air District, including contractors or grantees that the Air District utilizes to provide benefits and services to members of the public.

Auxiliary aids and services including, for example, qualified interpreters and/or listening devices, to individuals who are deaf or hard of hearing, and to other individuals as necessary to ensure effective communication or an equal opportunity to participate fully in the benefits, activities, programs and services will be provided by the Air District in a timely manner and in such a way as to protect the privacy and independence of the individual. Please contact the Non-Discrimination Coordinator identified below at least three days in advance of a meeting so that arrangements can be made accordingly.

If you believe discrimination has occurred with respect to an Air District program or activity, you may contact the Non-Discrimination Coordinator identified below or visit our website at [www.baaqmd.gov/accessibility](http://www.baaqmd.gov/accessibility) to learn how and where to file a complaint of discrimination.

Questions regarding this Policy should be directed to the Air District’s Non-Discrimination Coordinator, Rex Sanders, at (415) 749-4951 or by email at [rsanders@baaqmd.gov](mailto:rsanders@baaqmd.gov).

# BAY AREA AIR QUALITY MANAGEMENT DISTRICT

375 BEALE STREET, SAN FRANCISCO, CA 94105

FOR QUESTIONS PLEASE CALL (415) 749-4941

## EXECUTIVE OFFICE:

### MONTHLY CALENDAR OF AIR DISTRICT ANTICIPATED MEETINGS

#### JULY 2019

<u>TYPE OF MEETING</u>	<u>DAY</u>	<u>DATE</u>	<u>TIME</u>	<u>ROOM</u>
Board of Directors Regular Meeting (CANCELLED)	Wednesday	3	9:30 a.m.	1 <sup>st</sup> Floor Board Room
Board of Directors Stationary Source	Monday	8	9:30 a.m.	1 <sup>st</sup> Floor Board Room
Board of Directors Stationary Source (Cancelled and Rescheduled to July 8 <sup>th</sup> )	Monday	15	9:30 a.m.	1 <sup>st</sup> Floor Board Room
Board of Directors Personnel Committee (CANCELLED)	Wednesday	17	9:30 a.m.	1 <sup>st</sup> Floor Board Room
Board of Directors Legislative Committee (CANCELLED)	Wednesday	24	9:30 a.m.	1 <sup>st</sup> Floor, Yerba Buena Room #109
Board of Directors Mobile Source Committee	Thursday	25	9:30 a.m.	1 <sup>st</sup> Floor Board Room
Advisory Council Meeting	Monday	29	10:00 a.m.	1 <sup>st</sup> Floor Board Room
Board of Directors Special Meeting as the Sole Member of the Bay Area Clean Air Foundation	Wednesday	31	9:30 a.m.	1 <sup>st</sup> Floor Board Room
Board of Directors Special Meeting	Wednesday	31	10:00 a.m.	1 <sup>st</sup> Floor Board Room

#### AUGUST 2019

**No meetings scheduled at this time.**

## SEPTEMBER 2019

<u>TYPE OF MEETING</u>	<u>DAY</u>	<u>DATE</u>	<u>TIME</u>	<u>ROOM</u>
Board of Directors Regular Meeting	Wednesday	4	9:30 a.m.	1 <sup>st</sup> Floor Board Room
Advisory Council Meeting	Monday	9	10:00 a.m.	1 <sup>st</sup> Floor Board Room
Board of Directors Community & Public Health Committee	Thursday	12	9:30 a.m.	1 <sup>st</sup> Floor, Yerba Buena Room #109
Board of Directors Stationary Source Committee	Monday	16	9:30 a.m.	1 <sup>st</sup> Floor Board Room
Board of Directors Executive Committee	Wednesday	18	9:30 a.m.	1 <sup>st</sup> Floor Board Room
Board of Directors Climate Protection Committee	Thursday	19	9:30 a.m.	1 <sup>st</sup> Floor Board Room
Board of Directors Mobile Source Committee	Thursday	26	9:30 a.m.	1 <sup>st</sup> Floor Board Room

HL – 6/20/2019 – 4:20 p.m.

G/Board/Executive Office/Moncal

**BAY AREA AIR QUALITY MANAGEMENT DISTRICT**

Memorandum

To: Chairperson Rod Sinks and Members  
of the Stationary Source Committee

From: Jack P. Broadbent  
Executive Officer/APCO

Date: June 18, 2019

Re: Approval of the Minutes of April 29, 2019

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RECOMMENDED ACTION

Approve the attached draft minutes of the Stationary Source Committee (Committee) meeting of April 29, 2019.

DISCUSSION

Attached for your review and approval are the draft minutes of the Committee meeting of April 29, 2019.

Respectfully submitted,

Jack P. Broadbent  
Executive Officer/APCO

Prepared by: Marcy Hiratzka  
Reviewed by: Vanessa Johnson

Attachment 3A: Draft Minutes of the Committee Meeting of April 29, 2019

# AGENDA: 3A – ATTACHMENT

Draft Minutes – Stationary Source Committee Meeting of April 29, 2019

Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, California 94105  
(415) 749-5073

## Video Conference Location

Santa Rosa Junior College  
Doyle Library, Room 4248  
1501 Mendocino Avenue  
Santa Rosa, Ca 95401

## **DRAFT MINUTES**

Summary of Board of Directors  
Stationary Source Committee Meeting  
Monday, April 29, 2019

### **1. CALL TO ORDER – ROLL CALL**

Stationary Source Committee (Committee) Chairperson Rod Sinks called the meeting to order at 9:35 a.m. Director Zane was participating via videoconference from Santa Rosa Junior College. Vice President-elect of El Salvador, Félix Ulloa, was present at the beginning of the meeting, and recognized the Air District's efforts in conjunction with those of other regional government agencies in the pursuit of pollution reduction, energy efficiency, and sustainability.

Present: Committee Chairperson Rod Sinks; Vice Chairperson Karen Mitchoff; and Directors David Canepa, John Gioia, Carole Groom, Mark Ross, Brad Wagenknecht, and Shirlee Zane (remote).

Absent: Directors John J. Bauters, Nate Miley, and Jim Spering.

Also Present: None.

### **PUBLIC COMMENT ON NON-AGENDA MATTERS**

#### **2. Public Comment on Non-Agenda Items, Pursuant to Government Code Section 54954.3**

No requests received.

#### **3. APPROVAL OF THE MINUTES OF MARCH 18, 2019**

##### Public Comments

No requests received.



Committee Comments

None.

Committee Action

Director Wagenknecht made a motion, seconded by Vice Chair Mitchoff, to approve the Minutes of March 18, 2019; and the motion carried by the following vote of the Committee:

AYES: Gioia, Groom, Mitchoff, Ross, Sinks, Wagenknecht, Zane.  
NOES: None.  
ABSTAIN: None.  
ABSENT: Bauters, Canepa, Miley, Spering.

**4. UPDATE ON IMPLEMENTATION OF RULE 11-18, REDUCTION OF RISK FROM AIR TOXIC EMISSIONS AT EXISTING FACILITIES**

Greg Nudd, Deputy Air Pollution Control Officer of Policy, introduced Jerry Bovee, Acting Director of Meteorology and Measurements, who gave the staff presentation *Update on Monitoring Activities at Refineries and in Nearby Communities*, including: Regulation 12, Rule 15 monitoring background; Air District refinery monitoring efforts established prior to Rule 12-15; current facility emissions monitoring; Regulation 12, Rule 15 monitoring; ambient air pollution; factors that affect ambient monitoring measurements; monitoring in refinery communities; fence-line monitoring timelines and issues; air monitoring stations in refinery community; a quick word about Assembly Bill (AB) 617; point sources map; and wind speed map.

Public Comments

No requests received.

Committee Comments

The Committee and staff discussed the three existing refinery-operated fence line systems that are not currently regulated under Rule 12-15, and if/when any of them will be subject to Rule 12-15; how fence line monitors are controlled by the refineries, and community monitors are controlled by the Air District, and the projected timeline of when both types of monitors will be fully operating and providing real-time data online; whether the community monitors are capable of chemical speciation; the feasibility of the Air District employing low-cost monitoring technology from a company such as Purple Air, solely for data collection and identifying areas of significant risk exposure; the need for comprehensive strategies to address incident response; and how AB 617 implementation will help supplement source identification data.

Committee Action

None; receive and file.

**5. UPDATE ON THE IMPLEMENTATION OF REGULATION 12, RULE 15, PETROLEUM REFINERY EMISSIONS AND REGULATION 6, RULE 5, PARTICULATE MATTER FROM FLUIDIZED CATALYTIC CRACKING UNITS (FCCU) AT REFINERIES.**

Nicholas Maiden, Engineering Manager, gave the staff presentation *Update on the Implementation of Refinery Regulations: Rule 12-15, Petroleum Refinery Emissions Tracking, and Rule 6-5, Particulate Emissions from Fluidized Catalytic Cracking Units*, including: crude oil refining; crude oil; California and Bay Area refinery crude oil sources; Canadian crude oil imports; Rule 12-15; crude oil properties; fluidized catalytic cracking units; and Rule 6-5.

Public Comments

No requests received.

Committee Comments

The Committee and staff discussed whether the slide on “foreign sources” of crude oil includes Canadian Crude; confidentiality requirements regarding the composition of refineries’ raw feedstock, crude oil characteristics, and materials fed to FCCUs, and how the Air District collects environmental data from the refineries without publicly-disclosing sensitive refinery information; how much of an impact imported Canadian crude is having on the Bay Area; and how a refinery’s efficiency and productivity is affected by the type of crude that it uses as a feed stock.

Committee Action

None; receive and file.

**PUBLIC COMMENT ON NON-AGENDA MATTERS**

**6. Public Comment on Non-Agenda Items, Pursuant to Government Code Section 54954.3**

Public comments were made by Bob Brown, Western States Petroleum Association.

**7. COMMITTEE MEMBER COMMENTS**

None.

**8. TIME AND PLACE OF NEXT MEETING**

Monday, July 8, 2019, Bay Area Air Quality Management District Office, 375 Beale Street, San Francisco, California 94105 at 9:30 a.m.

**9. ADJOURNMENT**

The meeting adjourned at 11:01 a.m.

Marcy Hiratzka  
Clerk of the Boards

**BAY AREA AIR QUALITY MANAGEMENT DISTRICT**

## Memorandum

To: Chairperson Rod Sinks and Members  
of the Stationary Source Committee

From: Jack P. Broadbent  
Executive Officer/APCO

Date: June 17, 2019

Re: Update on Regional and Local Assessments of Particulate Matter

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**RECOMMENDED ACTION**

None; receive and file.

**BACKGROUND**

The most recent Draft Integrated Science Assessment for Particulate Matter (Draft PM ISA) reaffirms earlier findings of causal links between exposure to fine particulate matter (PM<sub>2.5</sub>) and heart disease and premature death. The Draft PM ISA also presents new findings on PM health impacts, even at levels below the current federal air quality standard for PM<sub>2.5</sub>. The lack of federal leadership in integrating the Draft PM ISA into new policy, has prompted the Air District to look closely at the latest science, in order to determine if it is necessary to develop additional policies to further reduce PM levels in the Bay Area, especially in the region's most impacted communities.

The current focus of the Air District's Advisory Council is to advise the Board of Directors (Board) and Air District staff on productive next steps for addressing concerns about PM health impacts, as the Air District approaches attainment of the current standards for PM. On April 3, 2019, Mr. Stan Hayes, Chair of the Advisory Council, presented a summary of the Draft PM ISA to the Board and the Air District's Advisory Council will host a PM Symposium in October 2019 to highlight the Draft PM ISA findings and discuss new approaches for assessing PM health impacts.

In August of 2018, the Board approved updates to Regulation 6, as part of a set of amendments and new rules to reduce emissions of particulate matter from various commercial and industrial operations. To inform additional regulatory efforts, Air District staff are developing improved emissions inventories and assessment tools to quantify the benefits of continued PM emission reductions at Bay Area facilities.

## DISCUSSION

Air District staff will report on progress to date in updating assessments of PM in the Bay Area. Air District monitoring sites for PM<sub>2.5</sub> show steady reductions since monitoring began in 2000, though wildfires and recent growth in emissions associated with vehicles threaten to slow or undo that progress. For the Community Air Protection Program - Assembly Bill (AB) 617 - the Air District has completed draft regional modeling of PM levels in the Bay Area. This regional air quality modeling and associated emission inventories provide useful data points on which air pollution sources are driving exposures to PM in the region. Some of the largest sources of PM for the region are residential wood burning, on-road cars and trucks, and secondary PM formed in the atmosphere.

Goals of the Air District's regional modeling efforts are to understand which sources of air pollution emissions are currently driving PM exposures in the Bay Area and to quantify the impacts of some of the larger industrial sources of PM, on people living near these sources. Large industrial sources have tall stacks designed to transport emissions away from nearby residents. A focus of recent modeling efforts is to evaluate how effective these stack designs are at protecting nearby communities by tracking individual plumes from stationary sources as they travel downwind.

Staff are pursuing a two-stage approach to improving assessments of PM for Bay Area facilities. The first stage will develop emissions inventories and modeling methods to track PM concentrations within communities, including stationary and mobile sources. These analyses will be augmented and improved in the future by the mobile monitoring work that Aclima will be conducting. A second phase-in partnership with the Advisory Council and with health officials, such as US Environmental Protection Agency's (EPA) National Center for Environmental Assessment (NCEA) and CalEPA's Office of Environmental Health Hazard Assessment (OEHHA) - will develop methods for conducting PM assessments for individual facilities that are like those conducted for toxic air contaminants. While challenges to completing these improved assessments remain, the technical assessment conducted to support the AB 617 West Oakland Community Air Action Plan has informed the first stage of our PM approach in that area. The US EPA's Environmental Benefits Mapping and Analysis Program-Community Edition (BenMAP-CE), which estimates the health and economic impacts of changes in air quality, will be used to inform a second stage of analysis for West Oakland.

BUDGET CONSIDERATION / FINANCIAL IMPACT

None.

Respectfully submitted,

Jack P. Broadbent  
Executive Officer/APCO

Prepared by: Phil Martien and Judy Cutino  
Reviewed by: Greg Nudd

**BAY AREA AIR QUALITY MANAGEMENT DISTRICT**

Memorandum

To: Chairperson Rod Sinks and Members  
of the Stationary Source Committee

From: Jack P. Broadbent  
Executive Officer/APCO

Date: June 17, 2019

Re: Update on the Implementation of Regulation 11, Rule 18 (Rule 11-18): Reduction of Risk from Air Toxic Emissions at Existing Facilities

RECOMMENDED ACTION

None; receive and file.

BACKGROUND

The Air District adopted Regulation 11, Rule 18, (Rule 11-18) Reduction of Risk from Air Toxic Emissions at Existing Facilities on November 15, 2017. As part of its implementation, the Air District uses air dispersion modeling and the latest science from the Office of Environmental Health Hazard Assessment (OEHHA) to evaluate health risks to communities from permitted facilities.

If a health risk exceeds a Rule 11-18 risk action level, the facility will be required to either:

- A) Reduce all health risks below the final risk action levels, or
- B) Install best available retrofit control technology for toxics (TBARCT) on all significant sources.

The final risk action levels are a cancer risk of 10 in a million, chronic hazard index of 1.0, and acute hazard index of 1.0.

The Rule 11-18 Implementation Flow Chart (Attachment 5A) gives an overview of the implementation steps and identifies public comment opportunities. The major implementation steps are: (1) screen facilities, (2) validate data, (3) conduct health risk assessment (HRA), (4) approve risk reduction plans (RRP), and (5) implement risk reduction measures. The public will have the opportunity to comment on the draft HRA and the draft RRP before these reports are finalized.

## DISCUSSION

### Process and Timeline

As described in the Rule 11-18 Implementation Procedures, the Air District uses prioritization scores to screen and classify sites as high priority, low priority, or exempt. High priority sites are further separated into two phases (Phase I or Phase II). High priority facilities with the highest potential for health risks are in Phase I. Phase II includes all other non-exempt high priority facilities. Based on a June 2018 screening assessment, the Air District found 43 Phase I sites and about 300 Phase II sites. This screening assessment will be conducted again in a few months to identify any new Phase I or Phase II sites.

There are currently 35 sites in Phase I. After facility data review, four facilities have been reclassified as Phase II and four facilities are now exempt from the rule. HRAs are underway for three sites. Staff is meeting on a weekly basis to review progress on the review of the emissions inventory and HRA input data for six sites. Data for 20 sites were received on the due date of June 14, 2019. On May 8, 2019, the Air District sent data requests to the five petroleum refineries and one refinery support facility. These Rule 11-18 data requests were tailored for the refineries, because annual emission inventory data for refineries will be collected pursuant to Rule 12-15, Petroleum Refining Emissions Tracking. Data from the refinery will not be received until the completion of the refinery heavy liquids study.

Overall, staff expects to require HRAs for about 30 of the Phase I sites. Staff expects to publish the first draft HRAs on the web site in the third quarter of 2019. Most of the Phase I HRAs will be published by the end of second quarter 2020. The final six refinery HRAs may be delayed until the end of 2020 due to the heavy liquids study, which may have a significant impact on the toxic inventory.

### Actions to Date

To implement the rule, the Air District convened a Rule 11-18 Implementation Workgroup to ensure transparency, provide industry and community perspectives, and facilitate communication with affected communities during the implementation of Rule 11-18. This workgroup includes representatives from environmental and health organizations, industry groups, refineries, and Air District staff. We have had three meetings to date. Recent discussion topics include: implementation plan and schedule, data review and validation process, use of consultants for conducting HRAs, emission factor assessment, and 1-hour emission inventories. The Air District is currently working on guidance documents for determining default emission factors, choosing source-specific emission factors, preparing 1-hour emission inventories, and preparing HRA modeling protocols to assist industry and staff with the first three implementation steps.

The implementation of Rule 11-18 has led to several infrastructure improvements. The Air District developed a new data management process for high priority facilities that will increase accuracy of annual toxic air contaminant (TAC) emission inventories, add new 1-hour TAC emission inventories, and collect all necessary input data for comprehensive HRAs. This process provides

regulated facilities with the information needed to understand the basis for their current Air District emission inventory; to identify potentially significant emissions; to easily request corrections to inaccurate data; to provide missing data; and to allow for data improvement and validation by Air District staff. The Air District has also updated our fee structure in Regulation 3 to meet cost recovery goals for the staff time needed to improve TAC inventories, conduct or review HRAs, and approve RRP's. In addition, staff updated the Air District web site by reorganizing page locations, consolidating documents, and adding new information related to Rule 11-18 implementation.

BUDGET CONSIDERATION / FINANCIAL IMPACT

None.

Respectfully submitted

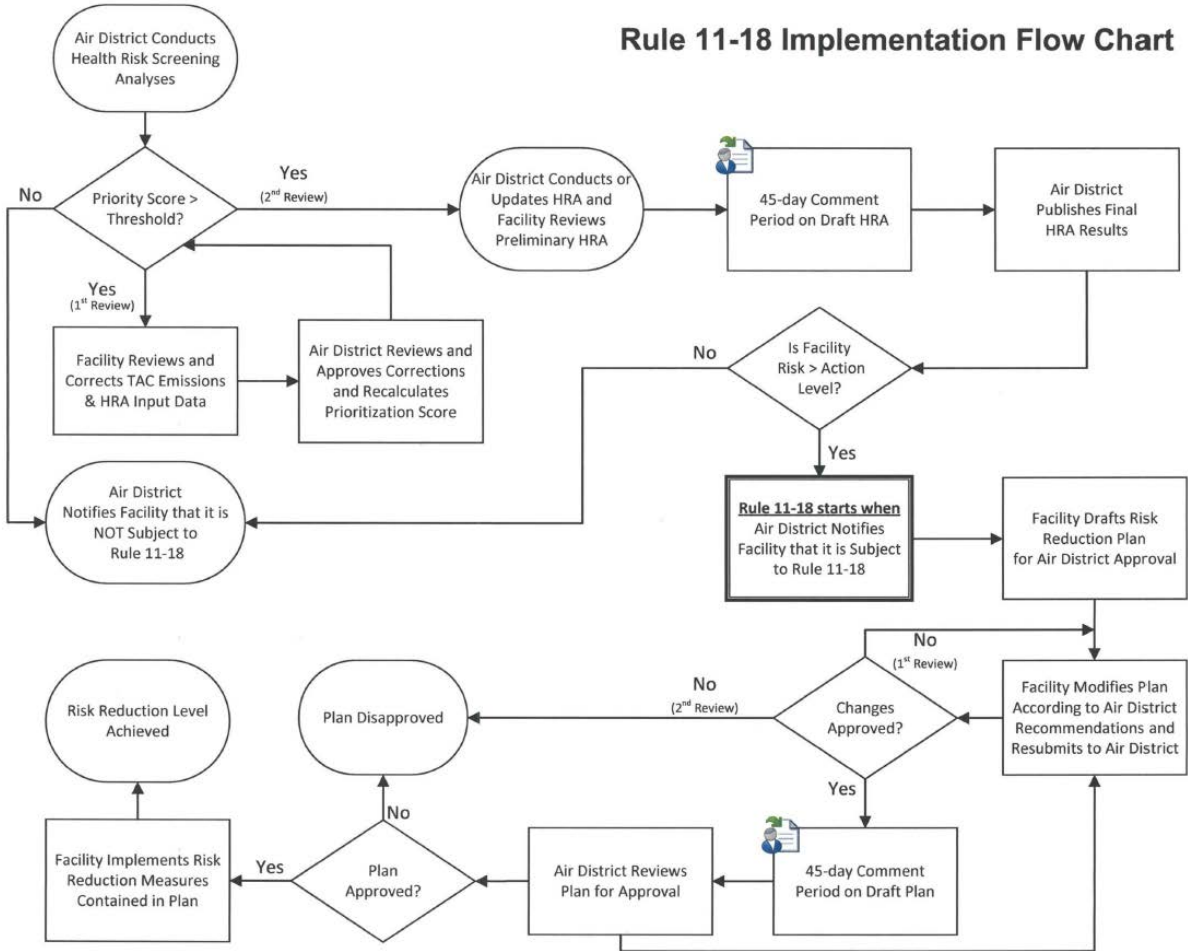
Jack P. Broadbent  
Executive Officer/APCO

Prepared by: Carol Allen  
Reviewed by: Sanjeev Kamboj, Pamela Leong and Damian Breen

Attachment 5A: Rule 11-18 Implementation Flow Chart



Rule 11-18 Implementation Flow Chart



**BAY AREA AIR QUALITY MANAGEMENT DISTRICT**

## Memorandum

To: Chairperson Rod Sinks and Members  
of the Stationary Source Committee

From: Jack P. Broadbent  
Executive Officer/APCO

Date: June 17, 2019

Re: Update on Rule Development for Amendments to Regulation 12, Rule 15 (Rule 12-15): Petroleum Refinery Emissions Tracking Rule

**RECOMMENDED ACTION**

None; receive and file.

**BACKGROUND**

Regulation 12, Rule 15 (Rule 12-15) Petroleum Refinery Emissions Tracking, currently requires Petroleum Refineries and Support facilities to report previous calendar year annual emissions inventories of criteria pollutants, Toxic Air Contaminants (TACs), and Greenhouse Gases (GHGs) to the Air District by June 30<sup>th</sup> of each year.

In December 2018, the California Air Resources Board (CARB) adopted the “Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants” (CTR Regulation), which established requirements and deadlines associated with reporting of criteria pollutant and TAC emissions. The CTR Regulation included deadlines for subject facilities to report information to the local air districts by May 1<sup>st</sup> of each year, and for the air districts to report information to CARB by August 1<sup>st</sup> of each year. The CTR regulation allows the districts to specify an earlier submittal date to supersede the May 1<sup>st</sup> due date.

In addition, CARB’s Mandatory Reporting Regulation for Greenhouse Gases (MRR) requires subject facilities to report GHG emission estimates to CARB by April 10<sup>th</sup> of each year, and third-party verified GHG emissions to CARB by August 10<sup>th</sup> of each year.

**DISCUSSION**

The proposed changes to Rule 12-15 revise the reporting deadline requirements to coordinate with the CTR Regulation and MRR deadlines, as shown in Table 1.

**Table 1:** Summary of Reporting Deadlines for Annual Emissions Inventories  
(Deadlines refer to submissions due to the Air District, unless otherwise specified)

<b>Pollutant</b>	<b>Existing 12-15</b>	<b>CTR Regulation</b>	<b>MRR</b>	<b>Proposed 12-15</b>
Criteria	June 30	May 1 From Air District to CARB: August 1	N/A	January 15
TAC	June 30	May 1 From Air District to CARB: August 1	N/A	January 15
Unverified GHG	June 30	N/A	From Facility to CARB: April 10	April 15
Third-Party Verified GHG	N/A	N/A	From Facility to CARB August 10	August 15

The CTR Regulation requires the Air District to provide the criteria pollutant and TAC annual emissions inventories to CARB by August 1<sup>st</sup> of each year. To allow for enough time to review and approve the annual emissions inventory, the Air District proposes revising the reporting deadline to the Air District to January 15<sup>th</sup> of each year.

Unverified GHG and third-party verified GHG annual emission inventories are due to CARB by April 10<sup>th</sup> and August 10<sup>th</sup> of each year, respectively. The proposed revisions to Rule 12-15 would require facilities to submit copies of the same reports to the Air District five days after the corresponding submission deadline to CARB.

BUDGET CONSIDERATION / FINANCIAL IMPACT

None. Staff is currently reviewing the impacts of the CTR Regulation on existing operations and expects that additional staff may need to be added in the Engineering, Inventory, Software Development and Compliance and Enforcement Groups to handle its requirements. Staff expects to return to the Board of Directors mid-year to discuss these needs.

Respectively submitted,

Jack P. Broadbent  
Executive Officer/APCO

Prepared by: Mark Gage  
Reviewed by: Damian Breen and Pamela Leong