

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Draft Staff Report for:

**Proposed Amended Rule 1180 – Fenceline and Community Air Monitoring for Petroleum Refineries and Related Facilities; and
Proposed Amended Rule 1180.1 – Fenceline and Community Air Monitoring for Other Refineries**

October 2026

Deputy Executive Officer

Planning, Rule Development and Implementation
Sarah L. Rees, Ph.D.

Assistant Deputy Executive Officer

Planning, Rule Development and Implementation
Michael Krause

Planning and Rules Manager

Planning, Rule Development and Implementation
Heather Farr

Authors: Jennifer Vinh – Air Quality Specialist

Contributors: Olga Pikelnaya, Ph.D. – Rule 1180 Implementation Manager
Yifan Yu, Ph.D. – Program Supervisor
Bhaskar Chandan – Senior Air Quality Engineering Manager
Kevin Katz – Air Quality Engineer
Zoya Banan, Ph.D. – Air Quality Specialist
Xian-Liang (Tony) Tian, Ph.D. – Program Supervisor
Matias Del Campo, Ph.D. – Air Quality Specialist

Reviewed by: Josephine Lee – Principal Deputy District Counsel
Yanrong Zhu – Program Supervisor
Kevin Ni – Program Supervisor
Barbara Radlein – Planning and Rules Manager

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
GOVERNING BOARD**

Chair: MICHAEL A. CACCIOTTI
Council Member, South Pasadena
Cities of Los Angeles County/Eastern Region

Vice Chair: LARRY MCCALLON
Councilmember, Highland
Cities of San Bernardino County

MEMBERS:

VANESSA DELGADO
Senator (Ret.)
Senate Rules Committee Appointee

CURT HAGMAN
Supervisor, Fourth District
County of San Bernardino

PATRICIA LOCK DAWSON
Mayor, Riverside
Cities of Riverside County Representative

HOLLY J. MITCHELL
Supervisor, Second District
County of Los Angeles

ADRIN NAZARIAN
Councilmember, Second District
City of Los Angeles Representative

JANET NGUYEN
Supervisor, First District
County of Orange

BRENDA OLMOS
Mayor, City of Paramount
Cities of Los Angeles County/Western Region

VERONICA PADILLA-CAMPOS
Speaker of the Assembly Appointee

V. MANUEL PEREZ
Supervisor, Fourth District
County of Riverside

CARLOS RODRIGUEZ
Council Member, Yorba Linda
Cities of Orange County

CEDRIC JAMIE RUTLAND, MD, FCCP
Governor's Appointee

EXECUTIVE OFFICER:

WAYNE NASTRI

TABLE OF CONTENTS

EXECUTIVE SUMMARY	Exe-1
CHAPTER 1: BACKGROUND.....	1-0
Introduction.....	1-1
Regulatory History	1-1
Need for Amendment	1-2
Public Process	1-3
CHAPTER 2: FENCELINE AND COMMUNITY AIR MONITORING	2-0
Introduction.....	2-1
Rule 1180 and Rule 1180.1 Implementation	2-1
Fenceline Air Monitoring Plans.....	2-2
Fenceline Air Monitoring System Installation Schedule.....	2-2
Community Air Monitoring.....	2-2
Independent Audits.....	2-3
Fenceline Air Monitoring Technologies.....	2-4
CHAPTER 3: PROPOSED AMENDED RULE 1180.....	3-0
Introduction.....	3-1
Proposed Amended Rule 1180.....	3-1
PAR 1180 (a) – Purpose	3-1
PAR 1180 (b) – Applicability	3-1
PAR 1180 (c) – Definitions	3-1
PAR 1180 (d) – Plan Requirements	3-2
PAR 1180 (e) – Plan Submittal Deadlines	3-3
PAR 1180 (f) – Fenceline Air Monitoring System Installation Compliance Schedule	3-3
PAR 1180 (g) – Plan Review Process	3-3
PAR 1180 (h) – Web-based Fenceline Data Display and Notification Program.....	3-3
PAR 1180 (i) – Fenceline Air Monitoring System Downtime or Malfunction	3-3
PAR 1180 (j) – Independent Audits.....	3-3
PAR 1180 (k) – Recordkeeping, Reporting, and Specific Cause Analysis	3-3
PAR 1180 (l) – Community Air Monitoring Fees	3-4
PAR 1180 (m) – Compliance.....	3-4
PAR 1180 (n) – RAMP for Full Closure Process	3-4

PAR 1180 (o) – Exemptions	3-7
CHAPTER 4: PROPOSED AMENDED RULE 1180.1	4-0
Introduction	4-1
Proposed Amended Rule 1180.1	4-1
PAR 1180.1 (a) – Purpose	4-1
PAR 1180.1 (b) – Applicability	4-1
PAR 1180.1 (c) – Definitions	4-2
PAR 1180.1 (d) – Plan Requirements	4-3
PAR 1180.1 (e) – Plan Submittal Deadlines	4-3
PAR 1180.1 (f) – Fenceline Air Monitoring System Installation Compliance Schedule ...	4-3
PAR 1180.1 (g) – Plan Review Process	4-3
PAR 1180.1 (h) – Web-based Fenceline Data Display and Notification Program	4-4
PAR 1180.1 (i) – Fenceline Air Monitoring System Downtime or Malfunction	4-4
PAR 1180.1 (j) – Independent Audits	4-4
PAR 1180.1 (k) – Recordkeeping, Reporting, and Specific Cause Analysis	4-4
PAR 1180.1 (l) – Community Air Monitoring Fees	4-4
PAR 1180.1 (m) – Compliance	4-4
PAR 1180.1 (n) – RAMP Process for Full Closure	4-4
PAR 1180.1 (o) – Exemptions	4-8
CHAPTER 5: IMPACT ASSESSMENT	5-0
AFFECTED SOURCES	5-1
PAR 1180	5-1
PAR 1180.1	5-1
EMISSION IMPACTS	5-2
SOCIOECONOMIC IMPACT ASSESSMENT	5-2
CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)	5-2
DRAFT FINDINGS UNDER HEALTH AND SAFETY CODE	5-2
Requirements to Make Findings	5-2
Necessity	5-3
Authority	5-3
Clarity	5-3
Consistency	5-3
Non-Duplication	5-3

Reference	5-3
INCREMENTAL COST-EFFECTIVENESS	5-3
COMPARATIVE ANALYSIS	5-3
APPENDIX A: RESPONSES TO COMMENTS	A-0
Comment PW-1: Scott Zerga (Phillips 66).....	A-1
Comment PW-2: Chris Chavez (Coalition for Clean Air)	A-2
Comment PW-3: Moses Huerta (Resident of Paramount)	A-2
Comment Letter #1: Phillips 66	A-3

LIST OF TABLES

Table 2-1: Existing Rule 1180 Data Display and Notification Websites.....	2-1
Table 4-1: PAR 1180.1 Table 2 – Refinery-Related Community Air Monitoring System Fees*	4-1
Table 5-1: PAR 1180 Affected Sources	5-1
Table 5-2: PAR 1180.1 Affected Sources	5-2
Table 5-3: Comparative Analysis	5-4

LIST OF FIGURES

Figure 3-1: PAR 1180 Full Closure Process Flowchart.....	3-4
Figure 3-2: Depiction of Two Related Facilities with Shared Boundary Inaccessible to the Public	3-9
Figure 4-1: PAR 1180.1 Full Closure Process Flowchart.....	4-5

EXECUTIVE SUMMARY

Rule 1180 – Refinery Fenceline and Community Monitoring was adopted in December 2017 to require major petroleum refineries to conduct real-time fenceline air monitoring for specified air pollutants at or near property boundaries and include a fee schedule for major petroleum refineries to fund refinery-related community air monitoring systems, which are operated by South Coast AQMD staff.

In January 2024, the South Coast AQMD Governing Board approved amendments to Rule 1180 and the adoption of Rule 1180.1 – Fenceline and Community Air Monitoring for Other Refineries. Rule 1180 was amended to remove the 40,000 barrel per day (bpd) exemption; broaden the applicability to include related facilities; include additional air pollutants for monitoring to reflect the Office of Environmental Health Hazard Assessment report, “Analysis of Refinery Chemical Emissions and Health Effects,” that was finalized in March 2019; enhance notifications and data displays; include independent audits and report related specifications. Rule 1180.1 was adopted to address smaller petroleum refineries that were previously not applicable to Rule 1180 with similar requirements.

Currently, Rule 1180 applies to seven petroleum refineries and five related facilities and Rule 1180.1 applies to three smaller refineries. Facilities have submitted revised Fenceline Air Monitoring Plan (FAMP) or new FAMP for review and approval to implement the new requirements. The FAMPs are subject to public review before staff issues an approval or partial approval for the subsequent compliance.

Phillips 66 Company/Los Angeles Refinery (Phillips 66 Carson) and Phillips 66 Company/LA Refinery Wilmington Pl (Phillips 66 Wilmington) are subject to Rule 1180. On October 16, 2024, Phillips 66 Company provided notice of its plan to cease operations at the Los Angeles-area refinery. Their Carson and Wilmington facilities have idled and ceased crude refining since the fourth quarter of 2025. However, Rules 1180 and 1180.1 do not provide specifications for existing facilities who plan to close their operations.

Proposed Amended Rule 1180 – Fenceline and Community Air Monitoring for Petroleum Refineries and Related Facilities (PAR 1180) and Proposed Amended Rule 1180.1 – Fenceline and Community Air Monitoring for Other Refineries (PAR 1180.1) aim to provide guidance for refineries and related facilities closing their operations. The proposed amended rules will require submittal of a Reclassified Air Monitoring Plan (RAMP), outlining intentions to fully close and timeline for completion, descriptions of activities to be done during the full closure process, and descriptions of changes to the fenceline air monitoring system and web-based fenceline data display and notification program, implementation schedule, and plans to comply with the quality assurance project plan for operating equipment. PAR 1180 and PAR 1180.1 also provide specifications on fenceline air monitoring systems, data display and notifications, community monitoring fees, recordkeeping, reporting, specific cause analysis, and independent audits during the closure process. Furthermore, the proposed amended rules exempt adjacent related facilities from monitoring requirement for a shared property boundary, extend the date for the next independent audit due to delay of the initial audit, and increase the public review time for plan approval.

The public process for PAR 1180 and PAR 1180.1 included two Working Group Meetings held on April 29, 2026, and June 23, 2026, respectively and a Public Workshop held on August 27, 2026.

CHAPTER 1: BACKGROUND

INTRODUCTION
REGULATORY HISTORY
NEED FOR AMENDMENT
PUBLIC PROCESS

INTRODUCTION

The South Coast AQMD Governing Board adopted Rule 1180 in December 2017 to require real-time fenceline air monitoring for specified compounds at or near the property boundaries and to provide data as quickly as possible to the public. The rule also includes a fee schedule to fund refinery-related community air monitoring systems that are operated by South Coast AQMD staff. Rule 1180 applies to petroleum refineries permitted to process petroleum, as defined in the Standard Industrial Classification Manual as Industry Number 2911, with an exemption for petroleum refineries that are subject to Rule 1180.1.

REGULATORY HISTORY

In October 2017, California State Legislature passed Assembly Bill 1647 (Muratsuchi) (AB 1647) to add Health and Safety Code Section 42705.6, which established mandates for fenceline air monitoring at petroleum refineries and air monitoring in nearby communities. Prior to or after the passage of AB 1647, several air districts adopted refinery fenceline and community air monitoring rules that align with the requirements of Health and Safety Code Section 42705.6.

2017 Adoption of Rule 1180

Rule 1180 was adopted by the South Coast AQMD Governing Board on December 1, 2017, and the rule applied to petroleum refineries that have a maximum capacity to process more than 40,000 bpd of crude oil.

2024 Amendment for Rule 1180 and Adoption of Rule 1180.1

In 2020, Comite Progreso de Lamont and others filed a lawsuit in Fresno County Superior Court (Court) against San Joaquin Valley Air Pollution Control District (SJVAPCD) regarding its fenceline and community air monitoring rules. The Court ordered SJVAPCD to remove compliance exemptions for non-crude oil refining facilities and to remove the 40,000-bpd exemption. South Coast AQMD commenced rule development to amend Rule 1180 in November 2022 to address the 40,000-bpd exemption. On December 19, 2022, East Yard Communities for Environmental Justice filed a lawsuit against South Coast AQMD in Los Angeles Superior Court (Case No. 22STCP04398) claiming the air district has not fulfilled its duty to implement Health and Safety Code Section 42705.6 due to the exemption for refineries with a refining capacity less than 40,000 bpd from the fenceline and community air monitoring requirements. The parties stipulated to a settlement. South Coast AQMD agreed to develop a proposed or proposed amended rule that removes the exemption for petroleum refineries with a capacity of less than 40,000 barrels per day.

On January 5, 2024, the South Coast AQMD Governing Board approved amendments to Rule 1180 and adopted Rule 1180.1. The exemption for petroleum refineries with a capacity of 40,000 barrels per day was removed from Rule 1180 and the applicability provision was updated to include facilities related to petroleum refineries. Rule 1180.1 was adopted to address petroleum refineries that were previously not applicable to Rule 1180, in addition to refineries that process alternative feedstocks and non-crude oil. The air pollutants to be monitored for both rules were updated to reflect the additional air pollutants identified in the Office of Environmental Health Hazard Assessment (OEHHA) report, “Analysis of Refinery Chemical Emissions and Health Effects” finalized in March 2019.

Rule 1180 and Rule 1180.1 addressed issues identified in the South Coast AQMD and SJVAPCD lawsuit. The rules also updated the air pollutants that require monitoring to reflect additional air pollutants identified in the OEHHA report. The applicability provision of Rule 1180 was expanded to include facilities with operations related to petroleum refineries located on contiguous or adjacent properties. Rule 1180.1 applies to facilities that are not subject to Rule 1180, including two asphalt refineries and one refinery that processes alternative feedstocks. Rule 1180 and Rule 1180.1 specify community air monitoring fees. In addition, both rules:

- Set notification thresholds for several of the newly included air pollutants and several air pollutants with historical fenceline monitoring data;
- Require a specific cause analysis and corrective actions when air pollutants are detected above notification thresholds; and
- Provide additional specifications on compliance schedule, web-based fenceline data display and notification program, independent audits, and quarterly reports.

Lastly, Rule 1180 and Rule 1180.1 require facilities to submit a FAMP for establishing and operating the fenceline air monitoring system. The Guidelines provide criteria for developing an approvable FAMP. The Guidelines were amended to clarify that they apply to both Rule 1180 and Rule 1180.1 and reflect the proposed changes in PAR 1180.

NEED FOR AMENDMENT

Phillips 66 Company announced plans to cease operations at Phillips 66 Carson and Phillips 66 Wilmington by the fourth quarter of 2025 in a press release on October 16, 2024[1]. Their Carson and Wilmington facilities have idled and ceased crude refining since the fourth quarter of 2025. Phillips 66 updated their FAMPs for both Carson and Wilmington sites on December 5, 2025, as a response to staff's comments made to their initial FAMP submitted in response to the 2024 amendment on August 5, 2024 [2,3]. In this revision, Phillips 66 stated that both facilities are "anticipated to begin idling before the end of 2025, at which point cleaning of all operational units in the refinery will commence". Furthermore, permits for air, water, and waste will remain, in addition to utilities needed for the project site during the closure process.

Staff conducted a site visit at the Phillips 66 Wilmington site on March 18, 2026, to further understand their current operations, current monitoring systems, and future plans for closure. Both sites have wastewater units operating to process tank water draws, groundwater recovery well fluids, and rainwater. The Carson facility is idle and not operating. At their Wilmington site, there are domed tanks being used to move products from the marine terminal to the distribution network. It is projected to take two to three years to fully decommission the domed tanks. Phillips 66 plans to keep all of their South Coast AQMD permits active, including Title V permits, at this time, while they redevelop for their Five Points Union Project [4]. Phillips 66 sought feedback from

[1] <https://investor.phillips66.com/financial-information/news-releases/news-release-details/2024/Phillips-66-provides-notice-of-its-plan-to-cess-operations-at-Los-Angeles-area-refinery/default.aspx>

[2] https://www.aqmd.gov/docs/default-source/fenceline_monitoring/updated_rule_1180_plans/p66-carson-famp_final-revised_2025_12_5.pdf

[3] https://www.aqmd.gov/docs/default-source/fenceline_monitoring/updated_rule_1180_plans/p66-wilmington-famp_final-revised_2025_12_5.pdf

[4] https://planning.lacity.gov/odocument/04028fe3-a8bc-4926-8f07-22bc51da0cc4/Five_Points_Union_Project_Description.pdf

staff on requiring fenceline air monitoring throughout the closure process and how long community air monitoring fees will be due.

Currently, Rule 1180 and Rule 1180.1 do not have provisions for facilities that plan to close and/or cease operations. There is a need for PAR 1180 and PAR 1180.1 to provide a pathway for any applicable facility that is planning to close.

PUBLIC PROCESS

PAR 1180 and PAR 1180.1 were developed through a public process that included two working group meetings designed to provide the public and stakeholders with an opportunity to discuss important details about the proposed rule amendments and provide input to South Coast AQMD staff during the rule development process. The working group meetings were attended by a variety of stakeholders including representatives from industry, environmental groups, community groups, and public agencies. A Public Workshop was conducted on August 27, 2026.

Date	Meeting Title	Highlights
April 29, 2026	Working Group Meeting #1	• Rule Development Process • Rule 1180 Background • Monitoring Equipment for Air Pollutants • Rule 1180 Implementation • Proposed Rule Concepts
June 24, 2026	Working Group Meeting #2	• Follow-up stakeholder comments from Working Group Meeting #1 • Federal, State, and Local regulations for refineries • Initial Preliminary Draft Rule Language
August 27, 2026	Public Workshop	• Preliminary Draft Rule Language

CHAPTER 2: FENCELINE AND COMMUNITY AIR MONITORING

INTRODUCTION

RULE 1180 AND RULE 1180.1 IMPLEMENTATION

INTRODUCTION

Rule 1180 currently applies to seven applicable petroleum refineries and five related facilities. The seven petroleum refineries became subject to Rule 1180 at the initial rule adoption on December 1, 2017. Related facilities were included in the 2024 amendment, where related facilities are defined as any establishment that has operations related to refinery processes located on properties adjacent or contiguous with a petroleum refinery. Related facilities must also receive more than 50 percent of their product input either directly or indirectly from any petroleum refinery or provide more than 50 percent of their product output either directly or indirectly to any petroleum refinery. The five related facilities consist of two hydrogen plants, a sulfur recovery plant, and two tank terminals.

Rule 1180.1 applies to one refinery that processes alternative feedstock and two asphalt plants. Rule 1180.1 was adopted to address smaller refineries that were previously exempted by Rule 1180.

RULE 1180 AND RULE 1180.1 IMPLEMENTATION

The seven petroleum refineries that became subject to Rule 1180 in 2017 have existing fenceline data display and notification systems. The links to their websites can be found in Table 2-1.

Table 2-1: Existing Rule 1180 Data Display and Notification Websites

Facility ID	Facility Name	Location	Data Display and Notification Website
174655	Tesoro Refining & Marketing Co, LLC	Carson	https://marathonlosangelesrefineryfencelinemonitoring.com/
800436	Tesoro Refining & Marketing Co, LLC	Wilmington	
800030	Chevron Products Co.	El Segundo	https://elsegundo1180.com/
171109	Phillips 66 Company/LA Refinery	Carson	https://www.p66losangeles1180.com/
171107	Phillips 66 Company/LA Refinery	Wilmington	

Facility ID	Facility Name	Location	Data Display and Notification Website
181667	Torrance Refining Company LLC	Torrance	https://torc.data.spectrumenvsoln.com/
800026	Valero (Permitted as Ultramar Inc.)	Wilmington	https://wilmingtonrefinerymonitoring.org/

The data display and notification websites for the five Rule 1180 related facilities and three Rule 1180.1 refineries are not currently available. These facilities will be required to have a data display and notification website upon commencing operation of their fenceline air monitoring systems.

Fenceline Air Monitoring Plans

To comply with the current Rule 1180 and Rule 1180.1, the applicable facilities were required to either submit a FAMP or revise their existing FAMP to address the new requirements.

For Rule 1180 facilities with existing FAMPs, the revised FAMPs for addressing new requirements or including a related facility with the same board of directors were due by August 5, 2024. For any facility subject to Rule 1180 or Rule 1180.1 with a new FAMP required, their FAMP was due by January 5, 2025.

The revised or new FAMPs submitted for the 2024 amendment will be posted on the Rule 1180 & Rule 1180.1 – Refinery Community and Fenceline Air Monitoring Latest Updates page for public review before an approval or partial approval would be issued[5].

Fenceline Air Monitoring System Installation Schedule

Rule 1180 facilities must complete installation and begin operation of a real-time air monitoring system within 15 calendar months of an approved or partially approved FAMP, whereas Rule 1180.1 refineries are required to meet the same requirement within 24 months of an approved or partially approved FAMP. If an approval or partial approval is issued for all facilities in 2026, installation of new or updated fenceline air monitoring systems are expected to be completed by 2028.

Community Air Monitoring

The revised Community Air Monitoring Plan (CAMP) was published in February 2025, and the revised Quality Assurance Project Plan (QAPP) was published in March 2025 [6,7]. The CAMP was revised to reflect changes made in the Rule 1180 amendment and adoption of Rule 1180.1.

[5] <https://www.aqmd.gov/home/rules-compliance/rules/support-documents/rule-1180-refinery-fenceline-monitoring-plans/rule-1180-rule-1180-1-latest-updates>

[6] https://www.aqmd.gov/docs/default-source/fenceline_monitoring/r1180_draft_community_monitoring_plan_rev_3_1180_1_022025_final_use.pdf?sfvrsn=40639c61_4

[7] https://www.aqmd.gov/docs/default-source/fenceline_monitoring/qapp_r1180_community_rev_1_draft_mar_2025.pdf?sfvrsn=ae6b9c61_4

With additional related facilities subject to Rule 1180 and three refineries subject to Rule 1180.1, which were not originally subject to Rule 1180 adopted in 2017, the CAMP outlines plans on implementation and operation of community air monitoring stations near these new facilities. The CAMP details site selection for the new community air monitoring stations, selection of monitoring technologies to the updated list of air pollutants, and public notification strategies for notification thresholds. The QAPP was updated to include new monitoring equipment for particulate matter, metals, and naphthalene. Staff sought community feedback for both the CAMP and QAPP in July 2025.

Additional monitoring equipment for metals and particulate matter have been installed at ten community air monitoring stations as of spring 2026. Operation of additional community air monitoring stations for Rules 1180 and 1180.1 are projected to commence in the fall of 2026. Two new stations are planned to be established for 1180 related facilities and three new stations for the 1180.1 refineries. Currently, air monitoring equipment is being purchased, and potential sites are being evaluated with two new site locations already being secured.

Rule 301 – Permitting and Associated Fees was amended on May 1, 2026, with an effective date of July 1, 2026. Subdivision (aa) details the annual fees due for community air monitoring system design, development, installation, operation, and maintenance. For the fiscal year of 2025-2026, the seven petroleum refineries originally subject to Rule 1180 had an annual operating and maintenance fee due, while the newly subject facilities did not have fees due. Thereafter, all facilities subject to Rule 1180 and Rule 1180.1 are required to pay an annual fee as shown in the Table in paragraph (aa)(2). These fees are reassessed every three years to ensure that the fees are consistent with the requirements of Health and Safety Code Section 42705.6 (f)(1) and (f)(2).

Independent Audits

Independent audits are required by both Rule 1180 and Rule 1180.1 for an impartial, third-party assessment of the fenceline monitoring system. These audits are tailored to determine whether Rule 1180 facilities' and Rule 1180.1 refineries' Fenceline Air Monitoring Systems and quality assurance procedures are consistent with the submitted FAMPs and are compliant with the Rules and Guidelines. Moreover, the independent audits will identify any deficiencies and areas of improvement.

Through a Request for Proposal, the South Coast AQMD selected a qualified contractor, National Physical Library (NPL), to develop an auditing protocol and implement the first independent audit of all existing Rule 1180 fenceline air monitoring systems. Staff shared the Independent Audit Protocol and Audit Checklist Questionnaire prepared by NPL for the public review in October – December 2025[8,9], and NPL commenced the audits in May 2026. Those audits are expected to conclude in the third quarter of 2026. Rule 1180 petroleum refineries with an existing FAMP are required to have the next independent audit completed by January 1, 2029 by the current rule, and subsequent audits every 36 calendar months thereafter. During the 2024 rule amendment, staff expected NPL to complete the initial independent audit by January 2026 for petroleum refineries with an existing FAMP, and thus, proposed their next audit by January 1, 2029. With the delay of the first independent audit completion time, staff is considering postponing the next audit due date

[8] https://www.aqmd.gov/docs/default-source/rule-book/proposed-rules/rule-1180-and-1180.1/rule_1180_audit_procedure_draft.pdf

[9] https://www.aqmd.gov/docs/default-source/rule-book/proposed-rules/rule-1180-and-1180.1/rule_1180_audit_checklist_and_questionnaire_draft.xlsx

accordingly in Rule 1180 for petroleum refineries to align with requiring an independent audit every 36 calendar months. Rule 1180 related facilities and Rule 1180.1 refineries without an existing FAMP are required to have the initial audit completed within 12 months after the installation and operation of their fenceline air monitoring system and subsequent audit every 36 months thereafter.

Fenceline Air Monitoring Technologies

The 2019 OEHHA Report lists 16 polycyclic aromatic hydrocarbons (PAHs) priority air pollutants and were added to the list of air pollutants to monitor for both Rules 1180 and 1180.1. One common method for analyzing PAHs in ambient air is via chromatography/mass spectrometry (GC/MS) according to U.S. EPA Compendium Method TO-13A[10]. Typical sample preparation for PAH analysis takes 16-24 hours, requiring time-specific, multistep preparations and, in turn, takes several days to collect samples, prepare samples, and perform analysis. Therefore, this methodology cannot provide real-time measurements of ambient air.

Naphthalene is the only PAH that can be monitored in real time via UV-DOAS and is listed separately in Table 1 for both rules. If there are commercially available technologies that can reliably provide real-time measurements of PAHs in the future, the Executive Officer will notify Rule 1180 facilities and Rule 1180.1 refineries of such technology.

EcoChem PAS 2000

A stakeholder suggested usage of the EcoChem PAS 2000 for fenceline air monitoring of PAHs[11]. The EcoChem PAS 2000 utilizes photoelectric ionization via an excimer lamp to measure the photoemission of PAHs bound to particulate matter. In the atmosphere, low molecular weight PAHs (i.e. two to three rings) are often found in the gaseous forms, whereas higher molecular weight PAHs (i.e. greater than four rings) are often bound to particulate matter [12]. The 220 nm excimer lamp exposes the particle-bound molecules to photons, where only particulate-bound PAHs can be ionized. These PAH molecules emit electrons as a result of this photoelectric ionization process. This creates positively charged molecules particles that can then be collected and measured.

While this technology can measure high molecular weight, particle-bound PAHs, PAHs that are not bound to particles, which tend to be lower molecular weight PAHs, are not able to be measured using this technology. Five of the 16 PAH priority air pollutants are three ringed PAHs, which would likely be unable to be measured by this instrument. Moreover, while vapor-phase PAHs exist in the atmosphere at relatively a small fraction due to their low vapor pressure, this technology would require separating vapor and particle phases prior to analysis. Sample collection is recommended over a 24-hour duration in order to be within the nominal detection limit. Therefore, this technology would not be suitable for real-time measurements of PAHs.

[10] <https://www.epa.gov/sites/default/files/2019-11/documents/to-13arr.pdf>

[11] <https://www.ecochem.biz/products/particles/pas-2000-photoelectric-aerosol-sensor/>

[12] <https://www.ncbi.nlm.nih.gov/books/NBK138709/>

CHAPTER 3: PROPOSED AMENDED RULE 1180

INTRODUCTION

PROPOSED AMENDED RULE 1180

INTRODUCTION

The main objective of the proposed amendments to Rule 1180 is to provide guidance for facilities to cease operations.

PROPOSED AMENDED RULE 1180

The following sections detail the changes made to Rule 1180.

PAR 1180 (a) – Purpose

The update of this subdivision is to clarify that related facilities are included.

PAR 1180 (b) – Applicability

Reference to Table 2 and Table 3 is updated in subdivision (b) to align with changes to the table name. Additionally, this rule applies to owners and operators of new facilities that begin operation after [Date of Rule Adoption]. This statement was added to clarify that even though a new facility may not be listed in Table 2 after [Date of Rule Adoption], they would still be subject to the rule.

PAR 1180 (c) – Definitions

Refer to PAR 1180 for a complete list of definitions. The following definitions are added or revised to PAR 1180, which are needed for the proposed new subdivision for facilities that cease operation.

- Decontamination System
- Emergency Standby Engine
- Executive Officer
- Facility
- Facility with Reclassified Operations (Reclassified Facility)
- Full Closure
- Full Closure Process
- Reclassified Air Monitoring Plan (RAMP)

Decontamination System is defined to further clarify the essential operations that are excluded from the Full Decommission definition. This includes processes for soil and water remediation.

“DECONTAMINATION SYSTEM is any process approved by the Executive Officer to remediate, destroy, remove, or encapsulate VOC and VOC-contaminated soil or water.”

Emergency Standby Engine is defined to clarify what processes are not considered part of the full decommission process. This is defined in Rule 1110.2 – Emissions from Gaseous and Liquid-Fueled Engines.

“EMERGENCY STANDY ENGINE is an engine which operates as a temporary replacement for primary mechanical or electrical power during periods of fuel or energy shortage while the primary power supply is under repair.”

Executive Officer is defined to align with other South Coast AQMD rules.

“EXECUTIVE OFFICER is as defined in Rule 102 – Definition of Terms.”

Facility with Reclassified Operations (Reclassified Facility) is defined to differentiate between a facility whose plans are to close and a facility who is not.

“FACILITY WITH RECLASSIFIED OPERATIONS (RECLASSIFIED FACILITY) is any Petroleum Refinery or Related Facility that has notified the Executive Officer in writing of an intent for Full Closure and is in the Full Closure Process.”

The definition for “Facility” is revised to include Reclassified Facilities.

“FACILITY” is any Petroleum Refinery, Related Facility, or Reclassified Facility.

Full Closure is defined to describe the end point by which a facility has removed all petroleum refining and petroleum refining-related equipment and process units.

“FULL CLOSURE is a complete and final removal of all petroleum refining-related process units at a Reclassified Facility with no future plan to use the Facility as a Petroleum Refinery or Related Facility; Full Decommission is when the Reclassified Facility no longer has active South Coast AQMD permits, except permits for essential operations, such as Emergency Standby Engines or Decontamination Systems.”

Full Closure Process is defined as the process occurring between when the owner or operator of a facility notifies the Executive Officer in writing the intent for full decommission and when full decommission is achieved. All efforts made to reach full decommission are part of the full decommission process.

“FULL CLOSURE PROCESS is the period of time that commences when the owner or operator of a Facility notifies the South Coast AQMD in writing of the intent for Full Closure and ends when Full Closure is achieved.”

A new plan, Reclassified Air Monitoring Plan (RAMP), is required to be submitted by a Reclassified Facility for Full Closure.

“RECLASSIFIED AIR MONITORING PLAN (RAMP) is a compliance plan that details information about air monitoring instrumentation, maintenance and quality control procedures, backup systems, auditing, and data reporting methods for the Reclassified Facility in the process of Full Closure.”

PAR 1180 (d) – Plan Requirements

Staff added paragraph (d)(3) to specify compliance and implementation in accordance to a partially approved FAMP, approved FAMP, or FAMP that is under review. If a facility undergoes a change of ownership or operator, the new owner or operator will be required to implement and comply with the existing approved FAMP or partially approved FAMP or implement the FAMP that was submitted by the previous owner or operator. The timelines for compliance and implementation of the fenceline air monitoring system should not reset upon change of ownership or change of operator.

For example, if a new related facility without an existing FAMP prior to January 5, 2024, did the following:

- Submitted a new FAMP on January 5, 2025,
- Obtained FAMP approval on April 1, 2026,

- In the process planning for the fenceline air monitoring system (due 15 months after April 1, 2026), and
- Submitted change of operator applications and forms on June 1, 2026.

The new owner would be required to install and operate their fenceline air monitoring system within 15 calendar months of April 1, 2026, when the FAMP was approved [subparagraph (f)(1)(A)] (timeline unchanged).

PAR 1180 (e) – Plan Submittal Deadlines

To provide clarity, staff changed the due date specified in paragraph (e)(2) from “seven calendar months after January 5, 2024” to the actual date of “August 5, 2024”. Staff made similar change for the due date specified in paragraph (e)(3). This clarification does not change the requirement of those due dates.

PAR 1180 (f) – Fenceline Air Monitoring System Installation Compliance Schedule

No changes were made to subdivision (f).

PAR 1180 (g) – Plan Review Process

Clause (g)(1)(B)(ii) was updated to include an additional condition for FAMPs that could be partially approved. A FAMP can be partially approved if the specific air monitoring equipment for any pollutant(s), rather than all required pollutants, is approved.

Paragraph (g)(4) was updated to change the public review timeline from 14 to 30 calendar days prior to FAMP approval. This change was made since the public comment period available for extension for the FAMP and revised FAMP approval process in response to the 2024 amendment. Additionally, references were updated to reflect changes in subdivision (c).

PAR 1180 (h) – Web-based Fenceline Data Display and Notification Program

The effective dates throughout subdivision (h) were updated to reflect dates that have already occurred in the past. References were updated to reflect changes in subdivision (c). The requirements for the subdivision remain unchanged.

PAR 1180 (i) – Fenceline Air Monitoring System Downtime or Malfunction

Formatting changes were made to subdivision (i), where the requirements for the subdivision remain unchanged.

PAR 1180 (j) – Independent Audits

Since the independent audits for Rule 1180 petroleum refineries concluded by the end of the third quarter of 2026, which is later than staff had anticipated, the subsequent independent audit date is moved from January 1, 2029 to January 1, 2030 to be consistent with requiring an independent audit every 36 calendar months.

PAR 1180 (k) – Recordkeeping, Reporting, and Specific Cause Analysis

No changes were made to subdivision (k).

PAR 1180 (l) – Community Air Monitoring Fees

Obsolete language was removed from subdivision (l) since community monitoring fee due dates are in the past and have been paid.

PAR 1180 (m) – Compliance

No changes were made to subdivision (m).

PAR 1180 (n) – RAMP for Full Closure Process

Subdivision (n) is a new subdivision that aims to guide reclassified facilities through the full closure process, which includes a RAMP submittal and review, along with requirements on fenceline air monitoring system, data display and notification, community monitoring fees, recordkeeping, reporting, specific cause analysis, and independent audits. Figure 3-1 provides an overview of the full closure process.

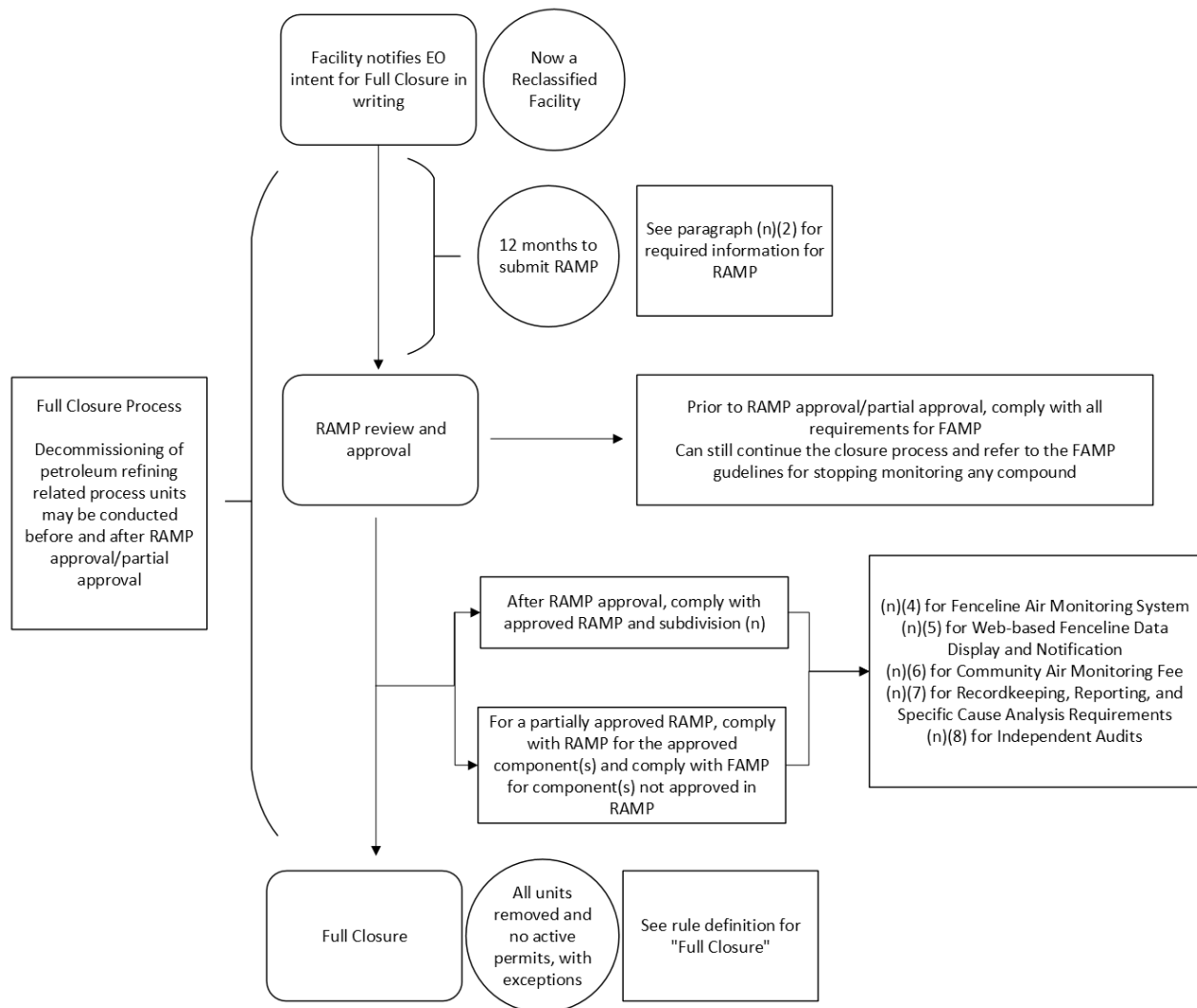


Figure 3-1: PAR 1180 Full Closure Process Flowchart

Paragraph (n)(1) – Rule Compliance

Paragraph (n)(1) clarifies that an owner or operator of a reclassified facility shall be subject to the applicable requirements of the rule until a RAMP is approved. While the full closure process may have already commenced prior to RAMP approval or partial approval, the facility must continue to comply with all applicable requirements of the rule, including, but not limited to their approved FAMP or revised FAMP. Once the reclassified facility is issued an approved RAMP, they must comply with the approved RAMP and all applicable requirements in subdivision (n).

If a reclassified facility is issued partial approval for their RAMP, they must comply with the components of their RAMP that were partially approved and must continue to comply with all applicable requirements of the rule, including, but not limited to their approved FAMP or revised FAMP. For example, if a reclassified facility with an existing fenceline air monitoring system is partially approved for all elements in their RAMP, except their technical justification for excluding a compound from fenceline air monitoring, as noted in (n)(2)(F), they would be required to continue to monitor the compound according to their existing approved or partially approved FAMP and comply with all approved elements of their RAMP.

If a reclassified facility with an approved or partially approved RAMP decides to discontinue their full closure process, they are subject to all applicable requirements of the rule and their approved or partially approved FAMP. For instance, if a reclassified facility is currently complying with their approved RAMP and decides to restart their operation, they will have to comply with all requirements in the rule and previously approved FAMP or partially approved FAMP.

Paragraph (n)(2) – RAMP Requirements

Paragraph (n)(2) lists the requirements for RAMPs. The purpose of the RAMP is to replace the previously submitted, approved, or partially approved FAMP. The RAMP, therefore, includes key components of the FAMP, such as the quality assurance project plan, independent audits, web-based fenceline data display and notification, and fenceline air monitoring system downtime or malfunction. Subparagraphs (n)(2)(A) through (n)(2)(E) are informational items and will be reviewed for completion. Subparagraphs (n)(2)(F) (if applicable), (n)(2)(G), and (n)(2)(H) are the basis by which RAMPs will be approved, partially approved, or disapproved.

Subparagraph (n)(2)(F) requires technical justifications for excluding a compound from fenceline air monitoring for the full closure process. Until the RAMP is approved, the reclassified facility must continue to monitor the compounds in the approved FAMP or revised FAMP. Technical justification can be included in the RAMP to exclude compounds that are not associated with any process at the facility from air monitoring. For instance, if a facility does not have a Fluid Catalytic Cracking Unit (FCCU), they would be able to provide technical justifications for excluding metals from air monitoring. Additionally, if the associated equipment for a compound is being removed as part of the full closure process, technical justifications can also be made to exclude a compound from monitoring. If a facility intends to remove hydrogen fluoride storage or to cease use of hydrogen fluoride, they may provide technical justifications for excluding hydrogen fluoride from monitoring. Other technical justifications approved by the Executive Officer to exclude a compound can also be made.

Subparagraph (n)(2)(G) states the requirements for a reclassified facility with an existing fenceline air monitoring system before the RAMP is due. This includes a description of the current fenceline air monitoring system, which includes, but is not limited to, the fenceline air monitoring coverage

(or spatial coverage) and a description of the fenceline air monitoring equipment. A description of the proposed changes to the fenceline air monitoring system and the implementation schedule is also required. Additionally, plans to continue to comply with the quality assurance project plan (subparagraph (c)(10)(c)), web-based fenceline data display and notification system (subdivision (h)), fenceline air monitoring system downtime or malfunction (subdivision (i)), and independent audits (subdivision (j)) must also be included in the RAMP for any air monitoring equipment that is in operation. Much of the information, such as the quality assurance project plan and data display and notification system can be the equivalent information included in a previously approved FAMP. Moreover, if a reclassified facility had plans to install monitoring equipment by October 31, 2027, but notified the Executive Officer for plans for full closure by August 1, 2026, the RAMP shall include a description of the original plans to install such equipment but note that the equipment will not be installed upon approval of their RAMP.

Subparagraph (n)(2)(H) states the requirements for a reclassified facility without an existing fenceline air monitoring system before the RAMP is due. Since these facilities do not have an existing fenceline air monitoring system, they are required to provide a description of the changes to the FAMP that was submitted according to subdivision (e) and their implementation schedule. In addition, plans to comply with subparagraph (c)(10)(c), subdivision (h), subdivision (i), and subdivision (j) must be included as applicable.

Paragraph (n)(3) – RAMP Review Process

RAMPs will be approved/partially approved or disapproved based on completion of subparagraphs (n)(2)(A) through (n)(2)(E), approval of technical descriptions stated in (n)(2)(F), if applicable, and approval of subparagraph (n)(2)(G) or (n)(2)(H), depending on the type of reclassified facility. Pursuant to subparagraph (n)(3)(A), a partial approval will be granted if only one or more compound(s), rather than all applicable compounds for a full approval, are approved for the change or exclusion from the fenceline air monitoring system, based on the completion of subparagraphs (n)(2)(A) through (n)(2)(E) and required approval for the compound(s) in accordance with applicable subparagraphs (n)(2)(F), (n)(2)(G), and (n)(2)(H). Another factor staff will consider prior to approving the removal of any air monitoring equipment is if any pollutants have been detected on those monitors. If refinery equipment is no longer operating, but pollutants continue to be detected, that would be a reason to require the monitoring equipment to remain active.

If a RAMP is disapproved, the owner or operator of a reclassified facility is required to submit a revised RAMP within 30 calendar days after notification of the disapproval. This revised RAMP shall include any information necessary to address any deficiencies in the disapproval letter.

Both RAMPs and revised RAMPs will be made available for public comment no less than 30 calendar days prior to approval.

Compliance plan fees as specified in Rule 306 are also due for the review, approval, and modifications of RAMPs and revised RAMPs.

Paragraph (n)(4) – Fenceline Air Monitoring System

An owner or operator of a reclassified facility shall not modify, remove, or cease operation of any fenceline air monitoring system, unless it is implemented in accordance with an approved RAMP. While the fenceline air monitoring system shall not be removed or cease operation, process

refinery equipment can be removed and cease operation prior to the approval of the RAMP or revised RAMP.

Paragraph (n)(5) – Web-based Fenceline Data Display and Notification

Similar to paragraph (n)(4), the web-based fenceline data display and notification shall not be modified, removed, or cease operation prior to the RAMP or revised RAMP approval.

Paragraph (n)(6) – Community Air Monitoring Fees

An owner or operator of a reclassified facility shall pay the annual operating and maintenance fees for the community monitoring system(s) until the fiscal year after the reclassified facility achieves full closure. For example, if a facility notifies the Executive Officer on April 1, 2027, that their facility plans for full closure and achieves full closure by January 6, 2032, the reclassified facility will pay for fees for fiscal years 2027 through 2032.

Paragraph (n)(7) – Recordkeeping, Reporting, and Specific Cause Analysis Requirements

An owner or operator of a reclassified facility shall comply with all applicable recordkeeping and reporting requirements and specific cause analysis requirements outlined in subdivision (k) and submit a report each calendar quarter no later than 45 days following the reporting period after the approval of the RAMP. The quarterly report must include emission sources with active South Coast AQMD permits and their operation status and monitoring equipment in operation. The purpose of these quarterly reports is to understand the potential emissions sources and what monitoring equipment is in operation to monitor the potential emissions.

Paragraph (n)(8) – Independent Audits

Reclassified facilities are still subject to the independent audit schedule outlined subdivision (j). For instance, if a facility becomes a reclassified facility in 2029, they are still subject to the independent audit that shall be completed by January 1, 2030. The subsequent independent audits will occur every 36 calendar months thereafter. The independent audits will only include equipment and systems in operation. Therefore, if any equipment or systems are taken down during the full closure process, the equipment of systems that are no longer in operation will not be audited.

PAR 1180 (o) – Exemptions

Paragraph (o)(5) was updated to include reclassified facilities in the exemption that allows certain compounds not to be monitored, e.g., hydrogen fluoride if it is not used or stored at the reclassified facility.

Paragraph (o)(6) provides an exemption for two related facilities from fenceline air monitoring along a shared boundary with no public access provided each facility's FAMP includes adequate coverage for the fenceline air monitoring system to detect any pollutant that could cross over the related facility boundary.

The figure below illustrates such an example where the green area (Facility A) and the purple area (Facility B) represent two related facilities. These facilities would not have to monitor along the shared fenceline pictured in red; however, they would each have to include the monitors along the yellow line in each of their FAMPs. To demonstrate adequate coverage, Facility A would not have to monitor along the red line; rather, air monitors located along the perimeter of Facility B, south of the red line, would provide adequate coverage for any pollutant traveling south from Facility A.

The air monitors on the boundaries of Facility B would need to be included in the FAMP of Facility A. The same would be true for Facility B, where there would be adequate coverage for a pollutant traveling north would be detected on Facility A's air monitors along the perimeter north of the red line. The facilities would be required to send notifications for any pollutant detected above a threshold that crossed the outside perimeter of both facilities boundaries, as indicated in yellow, and conduct a specific cause analysis to determine the source of the pollutant. If a pollutant crosses any part of the fenceline marked in yellow that is detected above the notification threshold, both Facility A and Facility B would be required to conduct Specific Cause Analysis pursuant to paragraph (k)(2) as both facilities are "utilizing the Fenceline Air Monitoring System that measured the air pollutant."

Further, air monitoring equipment on the outside perimeter of the facilities would have to include all air pollutants emitted from either facility to ensure pollutants will be detected when crossing the fenceline. For instance, even if Facility B does not emit H₂S, it would have to install H₂S monitor on its fenceline if Facility A emits H₂S to ensure adequate coverage along the entire outside perimeter. The air monitors on the southern boundary of Facility B would provide the coverage for any H₂S emitted from Facility A that traveled south, over Facility B's fenceline and into the community.

The facilities may submit a FAMP requesting to have a shared web-based fenceline data display portal and send shared notifications if pollutants are detected above the notification threshold. The main goal of Rule 1180 is to provide information to the public about any pollutants that cross into the communities, having multiple web-based fenceline data displays and notification could cause confusion.

On the contrary, if two related facilities do not want to share a fenceline air monitoring system that encompasses the strictly the yellow boundary outlined in **Figure 3-2**, both facilities can operate and maintain two separate fenceline air monitoring systems. Both facilities would include the shared boundary and include the relevant air pollutants for their respective facilities.

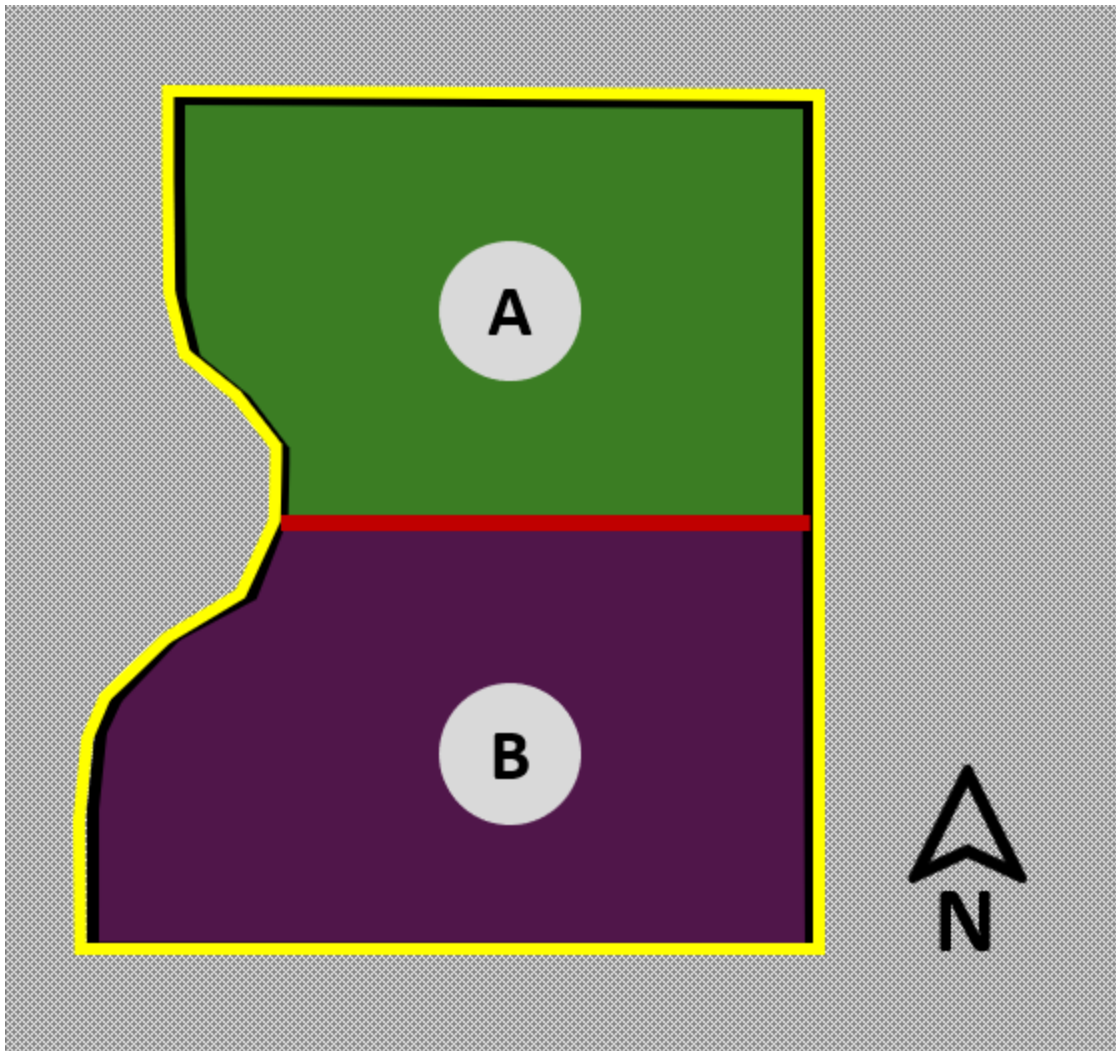


Figure 3-2: Depiction of Two Related Facilities with Shared Boundary Inaccessible to the Public

Paragraph (o)(7) provides exemptions from subdivisions (d), (e), (f), and (g) for a facility that has submitted a RAMP. After RAMP approval, the facility is not subject to those requirements even without this exemption.

CHAPTER 4: PROPOSED AMENDED RULE 1180.1

INTRODUCTION

PROPOSED AMENDED RULE 1180.1

INTRODUCTION

The main objective of the proposed amendments to Rule 1180.1 is to provide guidance for refineries to cease operations.

PROPOSED AMENDED RULE 1180.1

The following sections detail the changes made to Rule 1180.1

PAR 1180.1 (a) – Purpose

No changes were made to subdivision (a).

PAR 1180.1 (b) – Applicability

The applicability was updated to include reclassified refineries and their successors. Additionally, this rule applies to owners and operators of new refineries that begin operation after [Date of Rule Adoption]. This statement was added to clarify that even though a new refinery may not be listed in Table 2 after [Date of Rule Adoption], they would still be subject to the rule. Table 2 was also updated to reflect the current owners and operators.

Table 4-1: PAR 1180.1 Table 2 – Refinery-Related Community Air Monitoring System Fees*

			Effective Dates and Fee Requirements	
Refinery ID	Permit Name	Location	Phase One Implementation (No later than January 31, 2025)	Phase Two Implementation (No later than January 31, 2026)
187165 <u>201938</u> (formerly <u>187165</u>)	AltAir Paramount, LLC <u>Air Products Manufacturing, LLC</u> (formerly <u>AltAir Paramount, LLC</u>)	Paramount	\$230,947	\$538,876
800080	LTR dba World Oil Refining	South Gate	\$230,947	\$538,876
800393	Valero Wilmington Asphalt Plant	Wilmington	\$230,947	\$538,876

*Refinery ID and Permit Name as of [Date of Rule Adoption].

PAR 1180.1 (c) – Definitions

The following definitions are added or revised to PAR 1180.1, which are referenced in the newly proposed subdivision (n):

- Decontamination System
- Emergency Standby Engine
- Executive Officer
- Full Closure
- Full Closure Process
- Reclassified Air Monitoring Plan (RAMP)
- Refinery
- Refinery with Reclassified Operations (Reclassified Refinery)

Decontamination System is defined to further clarify the essential operations that are excluded from the Full Decommission definition. This includes processes for soil and water remediation.

“DECONTAMINATION SYSTEM is any process approved by the Executive Officer to remediate, destroy, remove, or encapsulate VOC and VOC-contaminated soil or water”

Emergency Standby Engine is defined to clarify what processes are not considered part of the full decommission process. This is defined in Rule 1110.2 – Emissions from Gaseous and Liquid-Fueled Engines.

“EMERGENCY STANDBY ENGINE is an engine which operates as a temporary replacement for primary mechanical or electrical power during periods of fuel or energy shortage while the primary power supply is under repair.”

Executive Officer is defined to align with other South Coast AQMD rules.

“EXECUTIVE OFFICER is as defined in Rule 102 – Definition of Terms.”

Full Closure is defined to describe the end point by which a facility has removed all petroleum refining and petroleum refining-related equipment and process units.

“FULL CLOSURE is a complete and final removal of all refining-related process units at a Reclassified Refinery with no future plan to operate as a Refinery; Full Closure is when the Reclassified Refinery no longer has active South Coast AQMD permits, except permits for essential operations, such as Emergency Standby Engines and Decontamination Systems.”

Full Closure Process is defined as the process occurring between when the owner or operator of a facility notifies the Executive Officer in writing the intent for full closure and when full closure is achieved. All efforts made to reach full closure are part of the full closure process.

“FULL CLOSURE PROCESS is the period of time that commences when the owner or operator of a Refinery notifies the South Coast AQMD in writing of the intent for Full Closure and ends when Full Closure is achieved.”

A new plan, Reclassified Air Monitoring Plan (RAMP), is required to be submitted by a Reclassified Facility for Full Closure.

“RECLASSIFIED AIR MONITORING PLAN (RAMP) is a compliance plan that details information about air monitoring instrumentation, maintenance and quality control

procedures, backup systems, auditing, and data reporting methods for the Reclassified Refinery in the process of Full Closure.”

The definition for “Refinery” is revised to include Reclassified Refineries.

“REFINERY is a facility that is permitted to Refine crude oil as defined in the Standard Industrial Classification Manual as Industry No. 2911 and/or a facility that is permitted to Refine Alternative Feedstocks, or a Reclassified Refinery. Refinery does not include petroleum refineries subject to Rule 1180.”

Refinery with Reclassified Operations (Reclassified Refinery) is defined to differentiate between a refinery whose plans are to close and a refinery who is not

“REFINERY WITH RECLASSIFIED OPERATIONS (RECLASSIFIED REFINERY) is any Refinery that has notified the Executive Officer in writing of an intent for Full Closure and is in the Full Closure Process.”

PAR 1180.1 (d) – Plan Requirements

Staff added paragraph (d)(3) to specify compliance and implementation in accordance to a partially approved FAMP, approved FAMP, or FAMP that is under review. If a refinery undergoes a change of operator or change of ownership, the new owner or operator will be required to implement and comply with the existing approved FAMP or partially approved FAMP or implement the FAMP that was submitted by the previous owner or operator. The timelines for compliance and implementation of the fenceline air monitoring system should not reset upon change of ownership or change of operator.

For example, if a refinery did the following:

- Submitted a new FAMP on February 5, 2025,
- Obtained FAMP approval on March 1, 2026
- In the process of planning their fenceline air monitoring system (due 24 calendar months after March 1, 2026)
- Submitted change of operator applications and forms on May 1, 2026

The new owner of the refinery would be required to install and operate their fenceline air monitoring system within 24 calendar months of March 1, 2026, when the FAMP was approved.

PAR 1180.1 (e) – Plan Submittal Deadlines

For paragraph (e)(1), the due date stating, “12 calendar months after January 5, 2024” is changed to “January 5, 2025” for clarity since the due dates have occurred in the past. This clarification does not change the requirement for these due dates.

PAR 1180.1 (f) – Fenceline Air Monitoring System Installation Compliance Schedule

No changes were made to subdivision (f).

PAR 1180.1 (g) – Plan Review Process

Subparagraph (g)(B)(ii) was updated to include an additional condition for FAMPs that could be partially approved. A FAMP can be partially approved if the specific air monitoring equipment for any pollutant(s), rather than all required pollutants, is approved.

Paragraph (g)(4) was updated to change the public review timeline from 14 to 30 calendar days prior to FAMP approval. This change was made since the public comment period was extended and available for extension for the FAMP and revised FAMP approval process in response to the 2024 rule adoption. Additionally, references were updated to reflect changes in subdivision (c).

PAR 1180.1 (h) – Web-based Fenceline Data Display and Notification Program

References were updated to reflect changes in subdivision (c). Requirements in subdivision (h) remain unchanged.

PAR 1180.1 (i) – Fenceline Air Monitoring System Downtime or Malfunction

Formatting changes were made to subdivision (i), where the requirements for the subdivision remain unchanged.

PAR 1180.1 (j) – Independent Audits

Formatting changes were made to subdivision (j), where the requirements for the subdivision remain unchanged.

PAR 1180.1 (k) – Recordkeeping, Reporting, and Specific Cause Analysis

No changes were made to subdivision (k).

PAR 1180.1 (l) – Community Air Monitoring Fees

No changes were made to subdivision (l). The fees outlined in Table 2 remain in the table since there is currently a past due payment for phase two implementation for one of the refineries.

PAR 1180.1 (m) – Compliance

No changes were made to subdivision (m).

PAR 1180.1 (n) – RAMP Process for Full Closure

Subdivision (n) is a new subdivision that aims to guide reclassified facilities through the full closure process, which includes a RAMP submittal and review, along with requirements on fenceline air monitoring system, data display and notification, community monitoring fees, recordkeeping, specific cause analysis, and independent audits. Figure 4-1 provides an overview of the full closure process.

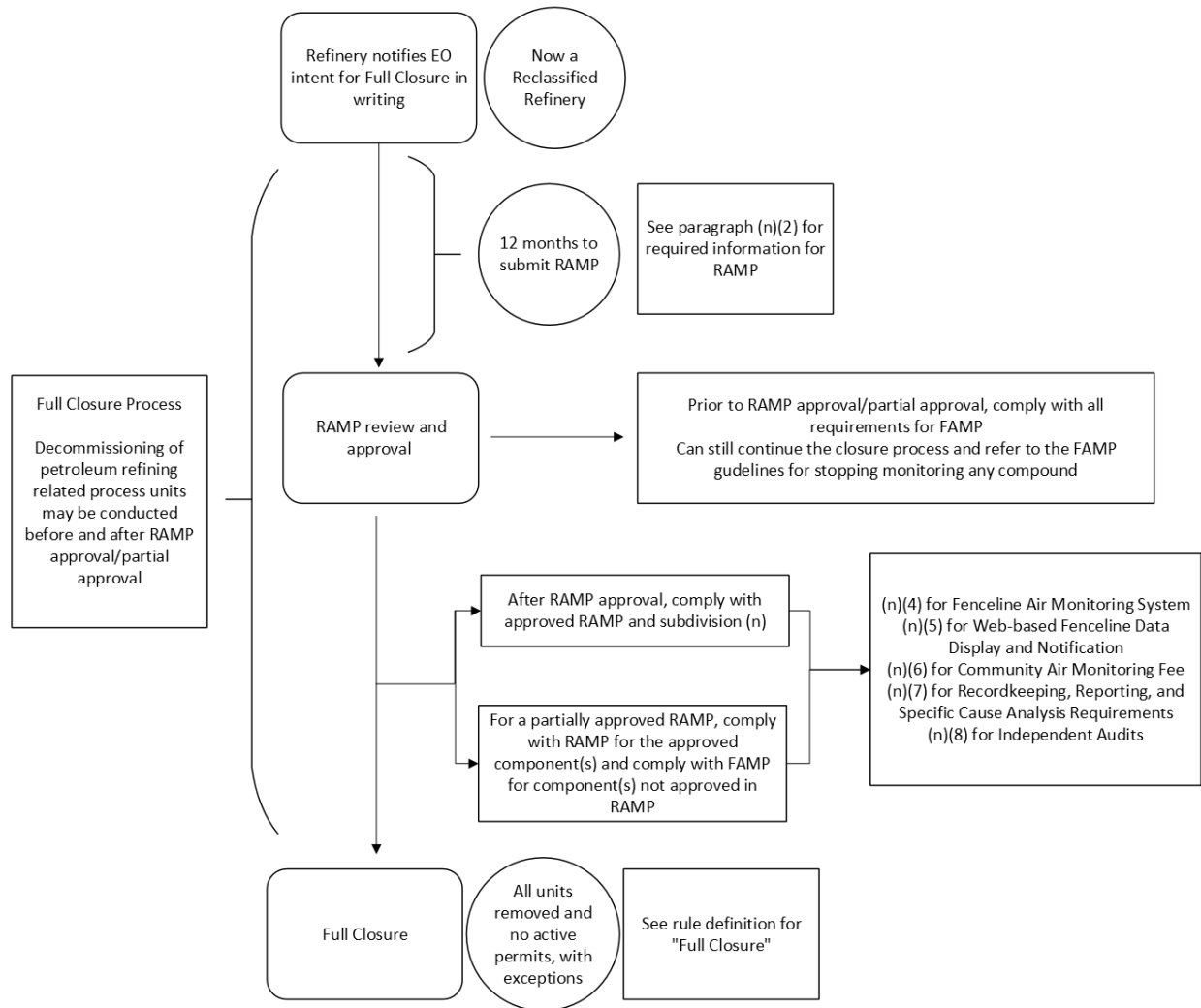


Figure 4-1: PAR 1180.1 Full Closure Process Flowchart

Paragraph (n)(1) – Rule Compliance

Paragraph (n)(1) clarifies that an owner or operator of a reclassified refinery shall be subject to the applicable requirements of the rule until a RAMP is approved. While the full closure process may have already commenced prior to RAMP approval, the refinery must continue to comply with all applicable requirements of the rule, including, but not limited to their approved FAMP or revised FAMP. Once the reclassified refinery is issued an approved RAMP, they must comply with the approved RAMP and all applicable requirements in subdivision (n).

If a reclassified refinery is issued partial approval for their RAMP, they must comply with the components of their RAMP that were partially approved and must continue to comply with all applicable requirements of the rule, including, but not limited to their approved FAMP or revised FAMP. For example, if a reclassified refinery with an existing fenceline air monitoring system is partially approved for all elements in their RAMP, except their technical justification for excluding a compound from fenceline air monitoring, as noted in (n)(2)(F), they would be required to continue to monitor the compound according to their existing approved or partially approved FAMP and comply with all approved elements of their RAMP.

If a reclassified refinery with an approved or partially approved RAMP decides to discontinue their full closure process, they are subject to all applicable requirements of the rule and their approved or partially approved FAMP. For instance, if a reclassified refinery is currently complying with their approved RAMP and decides to restart their operation, they will have to comply with all requirements in the rule and previously approved FAMP or partially approved FAMP.

Paragraph (n)(2) – RAMP Requirements

Paragraph (n)(2) lists the requirements for RAMPs. The purpose of the RAMP is to replace the previously submitted, approved, or partially approved FAMP. The RAMP, therefore, includes key components of the FAMP, such as the quality assurance project plan, independent audits, web-based fenceline data display and notification, and fenceline air monitoring system downtime or malfunction. Subparagraphs (n)(2)(A) through (n)(2)(E) are informational items and will be reviewed for completion. Subparagraphs (n)(2)(F) (if applicable), (n)(2)(G), and (n)(2)(H) are the basis by which RAMPs will be approved, partially approved, or disapproved.

Subparagraph (n)(2)(F) requires technical justifications for excluding a compound from fenceline air monitoring for the full closure process. Until the RAMP is approved, the reclassified refinery must continue to monitor the compounds in the approved FAMP or revised FAMP. Technical justification can be included in the RAMP to exclude compounds that are not associated with any process at the facility from air monitoring. Additionally, if the associated equipment for a compound is being removed as part of the full closure process, technical justifications can also be made to exclude a compound from monitoring. Other technical justifications approved by the Executive Officer to exclude a compound can also be made.

Subparagraph (n)(2)(G) states the requirements for a reclassified refinery with an existing fenceline air monitoring system before the RAMP is due. This includes a description of the current fenceline air monitoring system, which includes, but is not limited to, the fenceline air monitoring coverage (or spatial coverage) and a description of the fenceline air monitoring equipment. A description of the proposed changes to the fenceline air monitoring system and the implementation schedule is also required. Additionally, plans to continue to comply with the quality assurance project plan (subparagraph (c)(9)(C)), web-based fenceline data display and notification system (subdivision (h)), fenceline air monitoring system downtime or malfunction (subdivision (i)), and independent audits (subdivision (j)) must also be included in the RAMP for any air monitoring equipment that is in operation. Much of the information, such as the quality assurance project plan and data display and notification system can be the equivalent information included in a previously approved FAMP. For example, if a reclassified refinery had plans to install monitoring equipment by October 31, 2027, but notified the Executive Officer for plans for full closure by September 1, 2026, the RAMP shall include a description of the original plans to install such equipment, but note that the equipment will not be installed upon approval of their RAMP.

Subparagraph (n)(2)(H) states the requirements for a reclassified refinery without an existing fenceline air monitoring system before the RAMP is due. Since these facilities do not have an existing fenceline air monitoring system, they are required to provide a description of the changes to the FAMP that were submitted according to subdivision (e) and their implementation schedule. In addition, plans to comply with subparagraph (c)(9)(C), subdivision (h), subdivision (i), and subdivision (j) must be included as applicable.

Paragraph (n)(3) – RAMP Review Process

RAMPs will be approved or disapproved based on completion of subparagraphs (n)(2)(A) through (n)(2)(E), approval of technical descriptions stated in (n)(2)(F), if applicable, and approval of subparagraph (n)(2)(G) or (n)(2)(H), depending on the type of reclassified refinery. Pursuant to subparagraph (n)(3)(A), a partial approval will be granted if only one or more compound(s), rather than all applicable compounds are approved for the change or exclusion from the fenceline air monitoring system, based on the completion of subparagraphs (n)(2)(A) through (n)(2)(E) and required approval for the compound(s) in accordance with applicable subparagraphs (n)(2)(F), (n)(2)(G), and (n)(2)(H). Another factor staff will consider prior to approving the removal of any air monitoring equipment is if any pollutants have been detected on those monitors. If refinery equipment is no longer operating; however, pollutants continue to be detected, that would be a reason to require the monitoring equipment to remain active.

If a RAMP is disapproved, the owner or operator of a reclassified refinery is required to submit a revised RAMP within 30 calendar days after notification of the disapproval. This revised RAMP shall include any information necessary to address any deficiencies in the disapproval letter.

Both RAMPs and revised RAMPs will be made available for public comment no less than 30 calendar days prior to approval.

Compliance plan fees as specified in Rule 306 are also due for the review, approval, and modifications of RAMPs and revised RAMPs.

Paragraph (n)(4) – Fenceline Air Monitoring System

An owner or operator of a reclassified refinery shall not modify, remove, or cease operation of any fenceline air monitoring system, unless it is implemented in accordance with an approved RAMP. While the fenceline air monitoring system shall not be removed or cease operation, process refinery equipment can be removed and cease operation prior to the approval of the RAMP or revised RAMP.

Paragraph (n)(5) – Web-based Fenceline Data Display and Notification

Similar to paragraph (n)(4), the web-based fenceline data display and notification shall not be modified, removed, or cease operation prior to the RAMP or revised RAMP approval.

Paragraph (n)(6) – Community Air Monitoring Fees

An owner or operator of a reclassified refinery shall pay the annual operating and maintenance fees for the community monitoring system(s) until the fiscal year after the reclassified facility achieves full closure. For example, if a facility notifies the Executive Officer on June 1, 2027, that their facility plans for full closure and achieves full closure by January 6, 2033, the reclassified facility will pay for fees for fiscal years 2027 through 2033.

Paragraph (n)(8) – Independent Audits

Reclassified facilities are still subject to the independent audit schedule outlined subdivision (j). For instance, if a facility becomes a reclassified facility in 2029, they are still subject to the independent audit that shall be completed by January 1, 2030. The subsequent independent audits will occur every 36 calendar months thereafter. The independent audits will only include equipment and systems in operation. Therefore, if any equipment or systems are taken down during the full closure process, the equipment of systems that are no longer in operation will not be audited.

Paragraph (n)(7) – Recordkeeping, Reporting, and Specific Cause Analysis Requirements

An owner or operator of a reclassified refinery shall comply with all applicable recordkeeping and reporting requirements outlined in subdivision (k) and submit a report each calendar quarter no later than 45 days following the reporting period after the approval of the RAMP. The quarterly report must include emission sources with active South Coast AQMD permits and their operation status and monitoring equipment in operation. The purpose of these quarterly reports is to understand the potential emissions sources and what monitoring equipment is in operation to monitor the potential emissions.

PAR 1180.1 (o) – Exemptions

Paragraph (o)(3) provides exemptions from subdivisions (d), (e), (f), and (g) for a refinery that has submitted a RAMP. After RAMP approval, the facility is not subject to those requirements even without this exemption.

CHAPTER 5: IMPACT ASSESSMENT

AFFECTED SOURCES

EMISSION IMPACTS

SOCIOECONOMIC IMPACT ASSESSMENT

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

DRAFT FINDINGS UNDER HEALTH AND SAFETY CODE

INCREMENTAL COST-EFFECTIVENESS

COMPARATIVE ANALYSIS

AFFECTED SOURCES

PAR 1180

PAR 1180 applies to petroleum refineries and facilities with operations related to petroleum refineries located on contiguous or adjacent properties. Based on South Coast AQMD permits, and information provided by facilities, there are seven petroleum refineries and five facilities with operations related to petroleum refineries that would be affected by PAR 1180 as listed in the table below.

Table 5-1: PAR 1180 Affected Sources

Facility ID	Facility Name (Permit Name)	Location
Petroleum Refineries		
174655	Tesoro Carson (Tesoro Refining & Marketing Co, LLC)	Carson
800436	Tesoro Wilmington (Tesoro Refining & Marketing Co, LLC)	Wilmington
171109	Phillips 66 Carson (Phillips 66 Company/Los Angeles Refinery)	Carson
171107	Phillips 66 Wilmington (Phillips 66 Company/LA Refinery Wilmington Pl)	Wilmington
800030	Chevron, (Chevron Products Co.)	El Segundo
181667	Torrance (Torrance Refining Company LLC)	Torrance
800026	Valero (Ultramar Inc.)	Wilmington
Related Facilities		
151798	Tesoro SRP (Tesoro Refining & Marketing Co, LLC)	Carson
101656	Air Products Wilmington (Air Products and Chemicals)	Wilmington
3417	Air Products Carson (Air Products and Chemicals)	Carson
174694	Tesoro Logistics, Carson Crude Terminal	Carson
800057	Kinder Morgan Liquids Terminal LLC	Carson

PAR 1180.1

PAR 1180.1 applies to three refineries that refine crude oil, alternative feedstocks, or both crude oil and alternative feedstocks that are not subject to PAR 1180. Based on South Coast AQMD permits, there are three refineries that would be affected by PAR 1180.1:

Table 5-2: PAR 1180.1 Affected Sources

Facility ID	Facility Name	Location	Type
800393	Valero Wilmington Asphalt Plant	Wilmington	Asphalt Plant
800080	LTR dba World Oil Refining	South Gate	Asphalt Plant
201938 (formerly 187165)	Air Products Manufacturing, LLC (formerly AltAir Paramount, LLC)	Paramount	Alternative Feedstock

EMISSION IMPACTS

Fully closing a facility, which includes ceasing operations of petroleum refining or related equipment, will result in emissions reductions of NO_x, SO₂, VOC, PM_{2.5}, and PM₁₀. While PAR 1180 and PAR 1180.1 do not directly result in emission reductions, potential fugitive emissions during the full closure process via the RAMP approval process will be minimized.

SOCIOECONOMIC IMPACT ASSESSMENT

A socioeconomic impact assessment is not required by Health and Safety Code Sections 40440.8 and 40728.5 because the proposed amendments to PAR 1180 and PAR 1180.1 contain administrative changes that will not significantly affect air quality or emission limitations, and thus, will not result in significant socioeconomic impacts.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

Pursuant to the California Environmental Quality Act (CEQA) Guidelines Sections 15002(k) and 15061, the proposed project (PAR 1180 and PAR 1180.1) is exempt from CEQA pursuant to CEQA Guidelines Sections 15061(b)(3) and 15306. Further, there is no substantial evidence indicating that the exceptions to the categorical exemption, as set forth in CEQA Guidelines Section 15300.2, apply to the proposed project. A Notice of Exemption will be prepared pursuant to CEQA Guidelines Section 15062, and if the proposed project is approved, the Notice of Exemption will be filed with the county clerks of Los Angeles, Orange, Riverside, and San Bernardino counties, and the State Clearinghouse of the Governor's Office of Land Use and Climate Innovation.

DRAFT FINDINGS UNDER HEALTH AND SAFETY CODE

Requirements to Make Findings

Health and Safety Code Section 40727 requires that prior to adopting, amending or repealing a rule or regulation, the South Coast AQMD Governing Board shall make findings of necessity, authority, clarity, consistency, non-duplication, and reference based on relevant information presented at the public hearing and in the staff report.

Necessity

There is a need to adopt PAR 1180 and PAR 1180.1 to address closing and ceasing operations at a refinery or related facility.

Authority

The South Coast AQMD Governing Board has authority to adopt PAR 1180 and PAR 1180.1 pursuant to Health and Safety Code Sections 40000, 40001, 40440, 40441, 40702, 40725 through 40728, 41508, 41700 and 42705.6.

Clarity

PAR 1180 and PAR 1180.1 are written or displayed so that its meaning can be easily understood by the persons directly affected by it.

Consistency

PAR 1180 and PAR 1180.1 are in harmony with and not in conflict with or contradictory to existing statutes, court decisions or state or federal regulations.

Non-Duplication

PAR 1180 and PAR 1180.1 do not impose the same requirements as any existing state or federal regulation and it is necessary and proper to execute the powers and duties granted to, and imposed upon, the South Coast AQMD.

Reference

By adopting PAR 1180 and PAR 1180.1, the South Coast AQMD Governing Board will be implementing, interpreting, or making specific the provisions of the Health and Safety Code Sections 39002, 40001, 40702, and 42705.6 (refinery air monitoring) and Federal Clean Air Act Section 116 (Retention of State authority).

INCREMENTAL COST-EFFECTIVENESS

Health and Safety Code Section 40920.6 requires an incremental cost-effectiveness analysis for Best Available Retrofit Control Technology (BARCT) rules or emission reduction strategies when there is more than one control option that would achieve the emission reduction objective of the proposed amendments, relative to ozone, carbon monoxide, sulfur oxides, NO_x, and their precursors. PAR 1180 and PAR 1180.1 do not include new BARCT requirements; therefore, this provision does not apply to the proposed project.

COMPARATIVE ANALYSIS

Under Health and Safety Code Section 40727.2, the South Coast AQMD is required to perform a comparative analysis when adopting, amending, or repealing a rule or regulation. The comparative analysis is relative to existing federal requirements, existing or proposed South Coast AQMD rules and air pollution control requirements and guidelines which are applicable. As such, a comparative analysis for PAR 1180 and PAR 1180.1 is provided in the following table.

Table 5-3: Comparative Analysis

Rule Element	PAR 1180	PAR 1180.1	Health and Safety Code Section 42705.613	40 CFR Part 63, Section 63.65814
Applicability	– Petroleum refineries and related facilities. – Petroleum refineries and related facilities in the full closure process	– Refineries that refine crude oil, alternative feedstocks, or both crude oil and alternative feedstocks (smaller refineries exempted by PAR 1180)	– Petroleum Refineries	– Petroleum refineries that are a major source as defined by section 112(a) of the federal Clean Air Act; and emit or have equipment containing or contacting one or more specified hazardous air pollutants
Required air pollutants for monitoring	– Sulfur dioxide, oxides of nitrogen, PM10, PM2.5, total VOCs, formaldehyde, acetaldehyde, acrolein, 1,3 butadiene, naphthalene, PAHs, styrene, benzene, toluene, ethylbenzene, xylenes, metals (cadmium, manganese, nickel), hydrogen sulfide, carbonyl sulfide, ammonia, black carbon, hydrogen cyanide, hydrogen fluoride	– Sulfur dioxide, oxides of nitrogen, PM10, PM2.5, total VOCs, formaldehyde, acetaldehyde, acrolein, 1,3 butadiene, naphthalene, PAHs, styrene, benzene, toluene, ethylbenzene, xylenes, hydrogen sulfide, carbonyl sulfide, ammonia, hydrogen cyanide	– Not specified (compounds emitted to the atmosphere from refinery processes, as determined by the district; in accordance with guidance developed by the district)	– Benzene
Plan Requirements	– A facility shall revise an existing Fenceline Air Monitoring Plan (FAMP) or shall prepare a FAMP in accordance with the Rule 1180 and Rule 1180.1	– Same requirements as PAR 1180	– A district shall design, develop, install, operate, and maintain the refinery-related community air monitoring system, which shall be operated and	– The owner of operator must develop and submit a site-specific monitoring plan for approval according to the requirements in

13 Health and Safety Code Section 42705.6, available at: <https://codes.findlaw.com/ca/health-and-safety-code/hsc-sect-42705-6/#>

14 40 CFR Part 63 Section 63.658, July 2022, available at: <https://www.govinfo.gov/content/pkg/CFR-2022-title40-vol12/pdf/CFR-2022-title40-vol12-sec63-658.pdf>

Rule Element	PAR 1180	PAR 1180.1	Health and Safety Code Section 42705.613	40 CFR Part 63, Section 63.65814
	Fenceline Air Monitoring Plan Guidelines		maintained in accordance with guidance from the appropriate district – The refinery-related community air monitoring system shall include equipment capable of measuring compounds emitted to the atmosphere from refinery processes, as determined by the appropriate district – On or before January 1, 2020, the owner or operator of a petroleum refinery shall develop, install, operate, and maintain a fence-line monitoring system in accordance with guidance developed by the appropriate district	paragraph (i) of this section
Fenceline Air Monitoring Plan Submittal Deadline	– At least 12 calendar months prior to commencing operations at a new refinery – No later than August 5, 2024 for a petroleum refinery with an existing FAMP to update their systems or include new related facilities with common ownership	– Submit to the Executive Officer a written FAMP no later than January 5, 2025 or at least 12 calendar months prior to commencing operations at a new refinery – Ten to sixty calendar days to submit a revised FAMP addressing issues specified in the rule, which include planned and unplanned	– No provision	– No provision

Rule Element	PAR 1180	PAR 1180.1	Health and Safety Code Section 42705.613	40 CFR Part 63, Section 63.65814
	– No later than January 5, 2025 for a facility without an existing FAMP – Ten to sixty calendar days to submit a revised FAMP addressing issues specified in the rule, which include planned and unplanned modification, system malfunction, and deficiency identified by independent audit or specific cause analysis	modification, system malfunction, and deficiency identified by independent audit or specific cause <i>analysis</i>		
Monitoring Technologies or Test Methods	As specified in the Guidelines, real-time monitoring (e.g., measurement every 5 minutes) using: – Point monitors measuring black carbon, hydrogen sulfide, PM/PM2.5, and metals – Open-Path technologies including Fourier-transform infrared spectroscopy (FTIR) and Ultra-Violet Differential Optical Adsorption Spectrometer (UV-DOAS) for other air pollutants	As specified in the Guidelines, real-time monitoring (e.g., measurement every 5 minutes) using: – Point monitors measuring hydrogen sulfide, and PM/PM2.5 – Open-Path technologies including Fourier-transform infrared spectroscopy (FTIR) and Ultra-Violet Differential Optical Adsorption Spectrometer (UV-DOAS) for other air pollutants	– In accordance with guidance from the appropriate district	– Conduct sampling along the facility property boundary and analyze the samples in accordance with Methods 325A and 325B – Alternative test methods capable of real time measurements, open path instruments – Alternative method must be validated according to Method 301
Fenceline Air Monitoring System Installation and	– Complete installation and begin operation of a real-time fenceline air monitoring system	– Complete installation and begin operation of a real-time fenceline air monitoring system in accordance with the	– On or before January 1, 2020, the owner or operator of a petroleum refinery shall develop, install, operate, and	– By January 29, 2018 refineries are required to install fenceline air monitoring systems

Rule Element	PAR 1180	PAR 1180.1	Health and Safety Code Section 42705.613	40 CFR Part 63, Section 63.65814
Compliance Schedule	in accordance with the approved or partially approved FAMP: – Beginning no later than 15 calendar months after a FAMP submitted – No later than six calendar months after the Executive Officer approves, or partially approves, an updated FAMP – Prior to commencing operations at a new facility	approved or partially approved FAMP: – Facility without an existing FAMP: no later than 24 calendar months after a FAMP submitted – Facility with an existing FAMP: no later than six calendar months after a FAMP submitted – Prior to commencing operations at a new Refinery	maintain a fence-line monitoring system in accordance with guidance developed by the appropriate district	
Fenceline Air Monitoring Plan Review Process	– The Executive Officer shall notify the owner or operator in writing whether the FAMP is approved, partially approved, or disapproved – Determination of approval status for the fenceline air monitoring plan shall be based on, at a minimum, submittal of information that satisfies the criteria set forth in rule and guidelines	– Same requirements as PAR 1180	– No provision	– The U.S. EPA administrator is required to approve site-specific monitoring plans within 90 days of receipt – If the U.S. EPA Administrator disapproves the plan for deficiencies the petroleum refinery owner or operator is provided 90 days to re-submit the plan – The plan is considered approved if the U.S. EPA administrator approves the plan in writing or fails to disapprove the plan in writing – Approval of the site-specific plan will be based

Rule Element	PAR 1180	PAR 1180.1	Health and Safety Code Section 42705.613	40 CFR Part 63, Section 63.65814
				on completeness, accuracy and reasonableness of the request
Web-based Fenceline Data Display and Notification Program	– Maintain a web-based fenceline data display and notification program to display, store, which includes at least five calendar years of data and shall, at a minimum: – Automatically generate and issue a notification no later than 15 minutes after any air pollutant listed in Table 1 exceeds the applicable notification thresholds – Include a mechanism for public to opt-in to (and opt-out of) fenceline notifications – Send the fenceline notifications, by email and/or text message, to members of the public – Send follow-up notifications each time the measured concentration of the air pollutant exceeds follow-up notification threshold(s) – Send a follow-up notification after the air pollutant has been continuously detected at a level below the applicable Notification Threshold for 30	– Same requirements as PAR 1180	– The district and the owner or operator of a petroleum refinery shall collect real-time data from the refinery-related community air monitoring system and the fence-line monitoring system and shall maintain records of that data. To the extent feasible, the data generated by these systems shall be provided to the public as quickly as possible in a publicly accessible format.	– No provision

Rule Element	PAR 1180	PAR 1180.1	Health and Safety Code Section 42705.613	40 CFR Part 63, Section 63.65814
	minutes or two consecutive measurements			
Fenceline Air Monitoring System Downtime or Malfunction	– Upon installation and operation, a fenceline air monitoring system shall comply with the following notification requirements: ○ Call 1-800-CUT-SMOG® to notify the Executive Officer within 48 hours of planned maintenance activities ○ Call 1-800-CUT-SMOG to notify the Executive Officer within 2 hours of discovering and no more than eight hours after the start of downtime or malfunction that the system failed to accurately provide real-time air monitoring information for more than one hour – Submit a written notification to the Executive Officer of any equipment failure that also results in a failure to accurately provide continuous, real-time air monitoring information for 24 hours or longer. – Submit an updated FAMP to the Executive Officer if an equipment failure results in a failure to accurately provide continuous, real-time air	– Same requirements as PAR 1180	– No provision	– No provision

Rule Element	PAR 1180	PAR 1180.1	Health and Safety Code Section 42705.613	40 CFR Part 63, Section 63.65814
	monitoring information for more than 30 consecutive days			
Independent Audit	– Initiate an Independent Audit according to a protocol approved by the Executive Officer to identify any deficiencies in the Fenceline Air Monitoring System and quality assurance procedures – Conduct an Independent Audit no later than January 1, 2030 and subsequent Independent Audits shall be completed every 36 calendar months – Complete within 12 calendar months after the installation and operation of the Fenceline Air Monitoring System for a Fenceline Monitoring System installed on or after [Date of Rule Adoption – Corrective Action Plan to be submitted to the Executive Officer for review within three calendar months of the audit report – The Executive Officer shall notify the owner or operator of a facility in writing whether the Corrective Action Plan is approved or disapproved – If the Corrective Action Plan is disapproved, submit a revised	Cause an Independent Audit to be completed within 12 calendar months after the installation and operation of the Fenceline Air Monitoring System and Subsequent Independent Audits shall be completed once every 36 calendar months thereafter Same other requirements as PAR 1180	– No provision	– No provision

Rule Element	PAR 1180	PAR 1180.1	Health and Safety Code Section 42705.613	40 CFR Part 63, Section 63.65814
	Corrective Action Plan within 14 calendar days after notification of disapproval of the plan – Cause a qualified independent party to conduct and complete a follow-up Independent Audit within three calendar months of completing the corrective actions			
Recordkeeping, Reporting, and Specific Cause Analysis	– The owner or operator of a facility is required to maintain records of all information required under this rule for at least five calendar years – Initiate Specific Cause Analysis within 24 hours when an air pollutant listed in PAR 1180.1 Table 1 is measured above the Notification Threshold: ○ Submit a Specific Cause Analysis report to the South Coast AQMD and make it available on the web-based program within 14 calendar days – Submit a quarterly report within 60 calendar days after the conclusion of each quarter	– Same requirements as PAR 1180	– The district and the owner or operator of a petroleum refinery shall collect real-time data from the refinery-related community air monitoring system and the fence-line monitoring system and shall maintain records of that data	– If the annual average value for benzene is greater than the action level, conduct a root cause analysis and corrective action – Within 5 days of determining that the action level has been exceeded for any annual average, initiate a root cause analysis – No longer than 50 days after completion of the sampling period, initiate a root cause analysis to determine the cause of such exceedance and to determine appropriate corrective action – The root cause analysis and initial corrective

Rule Element	PAR 1180	PAR 1180.1	Health and Safety Code Section 42705.613	40 CFR Part 63, Section 63.65814
				action analysis shall be completed and initial corrective actions taken no later than 45 days after determining there is an exceedance
Community Air Monitoring Fees	– Requires facilities to pay an installation fee for refinery-related community air monitoring system (this fee is removed from the proposed rule since the payment was required and received by January 1, 2025) – Annual operating and maintenance fees for the community air monitoring system are to be recovered pursuant to Rule 301–Permitting and Associated Fees	– Same requirements as PAR 1180	– The owner or operator of a petroleum refinery shall be responsible for the costs associated with community air monitoring – To the extent a refinery-related community air monitoring system is intentionally utilized by a district to monitor emissions from sources under its jurisdiction other than a petroleum refinery, the district shall ensure the costs of the system are shared in a reasonably equitable manner	– No provision
RAMP for Full Closure Process	– Requires facilities to submit reclassified air monitoring plan (RAMP) within 12 months after notifying Executive Officer with intent to close – Plan approval process based on changes to current FAMP and compounds monitored by fenceline air monitoring system – Fenceline air monitoring system and web-based fenceline data	– Same requirements as PAR 1180	– No provision	– No provision

Rule Element	PAR 1180	PAR 1180.1	Health and Safety Code Section 42705.613	40 CFR Part 63, Section 63.65814
	display and notification to be operated according to RAMP after approval or partial approval – Community monitoring fees are due until fiscal year after the facility achieves full closure – Quarterly report on emissions sources with active South Coast AQMD permits and operation status and monitoring equipment in operation – Independent Audit for monitoring equipment in operation			
Exemptions	– An owner or operator of a refinery subject to Rule 1180.1 – Terminal with total tank storage capacity less than 310,000 barrels – Exempt from the requirement of operating an existing Real-Time Fenceline Air Monitoring System for 96 hours in a calendar year if new fenceline air monitoring equipment is installed to address any air pollutant in Table 1 and the facility complies with the notification requirement in subdivision (i). – An owner or operator of a Related Facility located entirely	– An owner or operator of a Refinery subject to Rule 1180 is exempt from the requirements of this rule – Exempt from the requirement of operating a real-time fenceline air monitoring system for 96 hours if new fenceline air monitoring equipment is installed to address any air pollutant in Table 1 and the facility complies with the notification requirement in subdivision (i) – Reclassified refineries with submitted RAMP exempt from FAMP requirements in	– No provision	– No provision

Rule Element	PAR 1180	PAR 1180.1	Health and Safety Code Section 42705.613	40 CFR Part 63, Section 63.65814
	within the boundary of a Petroleum Refinery – Facilities are exempt from monitoring the specified compound from Table 1 as follows: ○ Exempt from monitoring hydrogen fluoride if hydrogen fluoride is not used or stored at the Facility; ○ Related facilities are exempt from monitoring black carbon and the metal compounds; and ○ A terminal is exempt from monitoring all the compounds in Table 1 other than the volatile organic compounds and hydrogen sulfide. – Two related facilities that share a property boundary inaccessible to the public may submit a plan that does not include air monitoring equipment along shared property boundary. – Reclassified facility with submitted RAMP exempt from FAMP requirements in subdivisions (d), (e), (f), and (g).	subdivisions (d), (e), (f), and (g).		

APPENDIX A: RESPONSES TO COMMENTS

The following are comments made during the Public Workshop held on August 27, 2026.

Comment PW-1: Scott Zerga (Phillips 66)

Consider a clause disclosing that information submitted to the South Coast AQMD will be handled as confidential business information. Amending the RAMP if real-time PAH monitoring technology is made available and required by the FAMP. Requiring local, state, and federal laws to be included in the RAMP may not be useful. Consider asbestos abatement to be included as an exception in “Full Decommission” definition.

Response to Comment PW-1:

Information submitted to the Executive Officer may be designated as confidential under the provisions of the California Public Records Act (Government Code Section 7920.000 et seq.). The designation must be clearly indicated, identifying exactly what information is deemed confidential. The South Coast AQMD's Guidelines for Implementing the California Public Records Act, which were adopted by the Governing Board on May 6, 2005 and amended on July 5, 2013 specifically with reference to trade secrets, adequately protect confidential information from misappropriation[15]. The South Coast AQMD will request a justification from the entity claiming confidential information and evaluate the justification, any other information at its disposal, and determine if the justification supports the claim that the material is in fact trade secret under Government Code Section 7920.000 et seq.. If the South Coast AQMD determines the claim of confidentiality is not meritorious or is inadequately supported by the evidence, the South Coast AQMD will notify the entity who claimed confidential status that the justification is inadequate and that the information will be released after 21 calendar days from the date of such notice unless the person claiming trade secret takes further action to preclude such release. If technology for real-time monitoring for PAHs becomes available while a reclassified facility, with an approved or partially approved RAMP, is closing, they would not be required to revise their RAMP, as the requirement for plan revisions outlined in (e)(4)(G) for both rules are for facilities complying with FAMPs. Once a facility has an approved or partially approved RAMP, they no longer have to comply with the FAMP or the rule requirements, other than subdivision (n). Staff did include an exemption for facilities that have submitted a RAMP but the RAMP has not been approved or partially approved. In that case, the facility would not be required to add monitoring equipment for PAHs, add monitoring equipment for other additional compounds, or conduct an audit if the audit is required after the date the facility submitted the RAMP.

Staff believes including the local, state, and federal requirements in the RAMP will help both parties contextualize the full closure process activities and projected timelines.

Staff does not believe that including asbestos abatement would affect the definition for “Full Closure”, which is the new term for “Full Decommission” in the previous proposed rule version. Full closure is when the facility no longer has active South Coast AQMD permits, except permits for essential operations, such as emergency standby engines or decontamination systems. Asbestos abatement does not require a South Coast AQMD permit, although it is subject to Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities that requires notifications and specific work practices to limit asbestos emissions from job sites.

[15] https://www.aqmd.gov/docs/default-source/default-document-library/Guidelines/praguidelines.pdf?sfvrsn=94bbef61_2

Comment PW-2: Chris Chavez (Coalition for Clean Air)

Further thought and consideration for real-time monitoring of PAHs and estimate on timeline to review feasible PAH technology. Availability of FAMP approval status.

Response to Comment PW-2:

The Monitoring and Analysis Division is committed to monitoring and assessing the feasibility of real-time monitoring technologies for PAHs. A written notice will be issued once South Coast AQMD determines real-time monitoring of PAHs is feasible, which will trigger a revised FAMP according to the rule. FAMP approval statuses will be made public on the South Coast AQMD Rule 1180 and Rule 1180.1 webpage.

Comment PW-3: Moses Huerta (Resident of Paramount)

The effect of RAMP submittal on web-based data display and notification system

Response to Comment PW-3:

Reclassified facilities will continue their web-based data display and notification system in accordance with their approved RAMP.

Comment Letter #1: Phillips 66

Comment Letter #1

**Phillips 66 Comments
Rule 1180 Proposed Amendments**

Scott E. Zerga, P.E.
Sr. Environmental Consultant
Environmental Services

Phillips 66 Los Angeles Refinery
1860 West Anaheim St.
Wilmington, California 90744
Phone: (1) 310-952-6332
Email: scott.zerga@p66.com

September 10, 2026

Jen Vinh
South Coast Air Quality Management District
Planning, Rule Development, and Implementation
21865 E. Copley Dr.,
Diamond Bar, CA 91765

Submitted Electronically to jvinh@aqmd.gov

RE: Comments on Proposed Amended Rule 1180

Phillips 66 Company (Phillips 66) appreciates the opportunity to provide comments on SCAQMD's proposed Amended Rule 1180 Fenceline Monitoring for Petroleum Refineries. Phillips 66 has been operating a comprehensive monitoring system at both the Carson and Wilmington Plants, as well as hosting the UCLA UV-DOAS system at Wilmington. As you have acknowledged, Rule 1180 addresses new and operating facility requirements, but it did not contemplate monitoring at a facility which is in an idle state.

We have also appreciated District Staff's willingness to work with us as we idled active refining operations beginning in October, 2025. The new "Reclassified Air Monitoring Plan" (RAMP) was developed as a mechanism to address monitoring at a facility, such as ours, which is in the process of idling refining unit operations leading to entitlement and redevelopment. During this period of idling, all permits necessary for petroleum refining consistent with the facility's typical operations remain in effect. At the same time, there are certain activities which no longer make sense to perform while the refinery is idled. Fenceline monitors seeking to detect compounds associated with the refining process is one of these. As required by the current Fenceline Air Monitoring Plan (FAMP), Phillips 66 has continued to maintain and operate the Fenceline Monitoring system at considerable expense and effort. Given our unique experience with idling a petroleum refinery, we offer the following comments on Proposed Amended Rule 1180.

Fully Decommissioned Facility: Within the definitions section, the District proposes to incorporate a new term for a "Fully Decommissioned" facility. This term as defined by the District requires physical removal of all petroleum refining-related process units, in addition to giving up their related Title V permits. Achieving Fully Decommissioned status then allows for exiting paying the Community Monitoring fees due at Rule 301 (aa). The physical removal process itself could take years, as all asbestos would need removal under Rule 1403, and subsequent equipment demolition will also require permitting by other agencies. P66 suggests that RAMP approval itself be the criteria for exiting the fee payments the next fiscal year.

1-1



**Phillips 66 Comments
Rule 1180 Proposed Amendments**

Scott E. Zerga, P.E.
Sr. Environmental Consultant
Environmental Services

Phillips 66 Los Angeles Refinery
1660 West Anaheim St.
Wilmington, California 90744
Phone: (1) 310-952-6332
Email: scott.zerga@p66.com

Decontamination Systems: The exclusion of "Decontamination Systems" from applicability in a Fully Decommissioned Facility in the Rule is critical. Phillips 66 is operating and will continue to operate groundwater remediation systems. Phillips 66 will also have a need to process combined rainwater. These operations and their permitted equipment are on the Title V Permit today and may require additional permitting in the future as the need arises. We also suggest that, in the RAMP, a facility could propose additional excluded permitted equipment which supports remediation such as an on-site gasoline fueling station or Rule 222 permitted equipment for asbestos removal.

1-2

Future PAH Monitoring: We recognize there is community interest in adding continuous PAH monitoring to the Rule 1180 program. Currently real-time PAH monitoring is not commercially available, and is excluded from Rule 1180 monitoring requirements by the District. Should Phillips 66 be in a RAMP process or have RAMP approval, we propose that the PAH requirement not be applicable. Phillips 66 should not have to apply to amend a RAMP if the District decides that facilities with active refining operations need to add PAH monitoring equipment.

1-3

Independent Audits: Phillips 66 appreciates the District's proposal that an extra year is being allowed for the second round of Independent Audits. If Phillips 66 is in a RAMP review, or has an approved RAMP when this tolls, it does not make sense to also require a full audit. Phillips 66 suggests that a specific exclusion for facilities in the RAMP process or approval be excluded. It could be noted that if such a facility decided to resume active refinery operations, it would need to arrange for an audit within 12 months of restarting monitoring.

1-4

RAMP Approval: Phillips 66 is committed to ensuring both a careful review of any RAMP submitted to the District and allowing adequate time for public comment. Any facility that submits a RAMP is, by Rule 1180, committing to a full decommissioning in the future. While they wait on District approval, monitoring an idled site is required per the FAMP. We believe that the District could allow some reasonable boundaries on the time of this review. A one year limitation on the review, at which time the RAMP could be considered as tentatively approved, would provide certainty for budgeting and should be more than enough time for the District's process.

1-5

In conclusion, with the above comments in mind, Phillips 66 supports the approval of the Proposed Amended Rule 1180 and the RAMP process to be used in consideration of the idle Los Angeles Refinery, Carson and Wilmington Plants as SCAQMD has proposed.

Sincerely,

Scott E. Zerga, P.E.
Sr. Environmental Consultant
Environmental Services
Phillips 66 Los Angeles Refinery

E260226



Phillips 66 Comments
Rule 1180 Proposed Amendments

Scott E. Zerga, P.E.
Sr. Environmental Consultant
Environmental Services

Phillips 66 Los Angeles Refinery
1660 West Anaheim St.
Wilmington, California 90744
Phone: (1) 310-952-6332
Email: scott.zerga@p66.com

Bcc:
L. Owolabi
L. Faichney
N. Weinberg-Lynn
H.. Barzotti
S. Zerga
DRM HSE 2.7.6.9 – HE13

Responses to Comment Letter #1

Response to Comment 1-1

Since fenceline air monitoring is to be conducted in accordance to an approved RAMP throughout the full closure process, staff believes that payment for the community air monitoring is necessary. Actions taken to reach full closure have the potential to emit to nearby communities.

Response to Comment 1-2

Facilities can provide technical justification for changing any parts of the fenceline air monitoring system in the RAMP for review by the South Coast AQMD. Staff does not think further changes to the definitions or rule language is necessary to accommodate this request. Please also refer to Response to Comment PW-1.

Response to Comment 1-3

Paragraph (o)(7) for both PAR 1180 and PAR 1180.1 include an exemption from several provisions that include the installation and implementation of real-time monitoring technology for PAHs for reclassified facilities whose RAMP is submitted.

Response to Comment 1-4

Staff does not agree with the comment that audits should not be required when they are in the process of closing. Any monitoring equipment that is still required to be on-site will need to be audited. Audits are an important part of quality assurance that ensures data being provided to the public and the South Coast AQMD accurately reflects the emissions traveling over the fenceline.

Response to Comment 1-5

The RAMP review process is an iterative process that requires active communication between the South Coast AQMD and the affected facility, and varies case-by-case, so the time by which a RAMP will be reviewed and approved will vary. Staff is committed to reviewing the plans as expeditiously and thoroughly as possible, while giving adequate time for the facilities to respond and for the public to provide feedback before approval.