

CBE 2017 LA Refinery Flaring Update

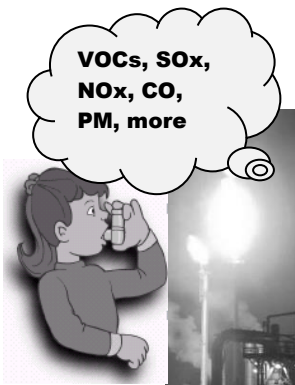
What do flares do? Flares burn gases when refineries partly or completely shut down, and gases have no place to go, so it is necessary to burn deadly gases instead of directly dumping to the air. Flares still cause large emissions, but **MOST FLARING IS PREVENTABLE!** Emergency Flaring is caused by unplanned shutdowns, when gases are flared to avoid explosions or direct dumping to air. Emergencies can be prevented by avoiding repeated malfunctions, through backup systems & backup power, better maintenance, etc. Planned Shutdown Flaring can be reduced by slowing down vessel depressuring, sending gases to other parts of the facility, or even storing gases, although this is harder if the whole refinery is being shutdown.

Flare Minimization Planning for each refinery can provide customized plans.

- ▶ **Be a watchdog, call 1-800-CUT-SMOG when you see large flares, smoking flares, or smell flaring --** Leave a message if you don't reach anybody. Take pictures.
- ▶ **Anyone can sign up for Air District email notices of flaring** (although notices still give too little information): <http://www.aqmd.gov/comply/1118/faqs.htm>

Come to the July 7th, 2017 Air District Public Hearing, Support the Rule Tightening (21865 Copley Dr., Diamond Bar, CA 91765), and ask for strengthening amendments:

- **The AQMD should tighten SOX Performance Standards to 0.1 tons per million barrels crude oil processed**, which should apply to all flaring. The District is also requiring investigating virtually eliminating flaring; we fully support this investigation.
- **The AQMD should add a VOC Performance Standard & fee penalty now (there is none – only one for SOx).** This is especially important since AQMD knows VOC emissions are ten times higher.
- **So-called Clean Service Flares, should no longer be named this way, since they can cause large VOCs emissions**, and should not have special treatment. Emissions Factors for these flares burning propane, butane, and methane greatly underestimate emissions, and should use the same emission factor as other Vent Gases (0.66 lbs/million BTUs of gas burned, instead of 0.009lbs/MMBTU).
- **We want Remote Sensing monitoring of flaring as soon as possible, because flare destruction efficiency can go very low, causing big emissions.** This type of monitoring is a key development, and we strongly support the Air District's work to set this in place.
- **We support the District's working toward Zero *Planned* Flaring, but we also seek to minimize *all* flaring**, including Unplanned Flaring, and get rid of so-called "Essential Operational Needs" Flaring.
- **We are concerned about flaring due to power outages**, and want more prevention.
- **There is no longer any reason to exempt methane emissions from flaring** - studies show methane can substantially contribute to ground-level ozone, in addition to being a potent greenhouse gas.
- **The Flare Data should be online!** The Bay Area Air District already puts data online, but the South Coast only provides quarterly totals. To get data on individual flare events, we have to do Public Records Act requests.



EPA found out flare VOCs are 10 times higher than they previously thought!

