

Petroleum Refinery Fenceline Monitoring Stakeholder Engagement

Webinar for State, Local and Tribal Governments

June 22, 2016

Overview

- Fenceline Monitoring Requirements
- ► Why Monitor for Benzene?
- What is the "Action Level"?
- What are the Benefits to the Public?
- Schedule
- Public Display of Data Examples
- Stakeholder Input
- Additional Information

Fenceline Monitoring Requirements for Petroleum Refineries

- In 2015, in large part due to stakeholder input, EPA's air pollution rule for refineries includes:
 - Monitoring air concentrations of benzene along the perimeter (e.g. at the fenceline) of U.S. refineries
 - Reporting the monitored benzene concentrations to EPA
 - Conducting analysis and corrective action upon exceeding an established benzene concentration limit along the perimeter of these facilities

Why Monitor around Petroleum Refinery Fencelines?



What is Benzene?

- Benzene is a colorless hazardous air pollutant with a sweet odor that is widely used in the U.S.
 - Used in the production of a wide variety of products including rubber, plastic, nylon and synthetic fibers
 - Component of crude oil, gasoline, and cigarette smoke
 - Highly flammable
 - Evaporates into air quickly
 - Human carcinogen via all routes of exposure

Benzene



Why Monitor for Benzene?

- Benzene is found in nearly all refinery processes and waste streams
- Majority of refinery benzene emissions are estimated to be from leaky pipes, valves and equipment and waste water sources
- Exposure to benzene can lead to a variety of health effects, including increased risk of cancer
- Exposure to benzene was one of the primary contributors to health risks associated with refinery emissions



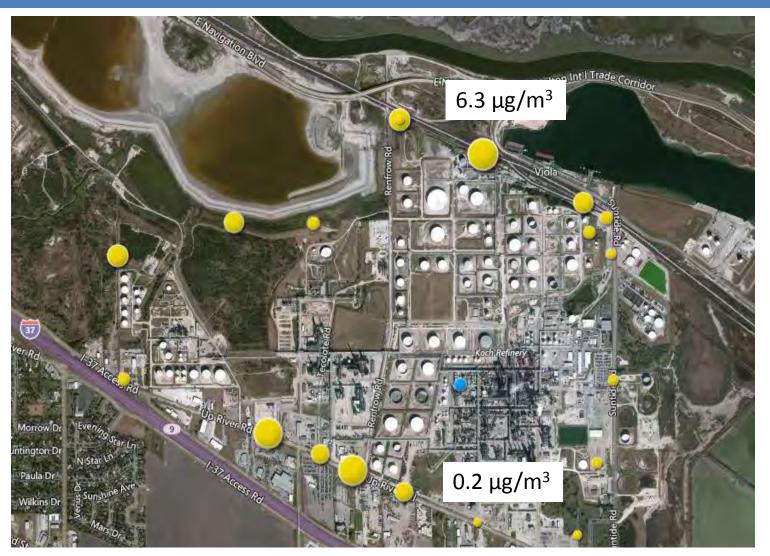
Benzene monitor

Why Use Passive Diffusive Tube Monitoring?

- Allows for continual monitoring of pollutant concentrations around the entire plant
- Has detection limits low enough to be able to detect the concentrations of the pollutants in the ambient air near a refinery during typical operating conditions



What is the "Action Level" for Fenceline Monitoring?

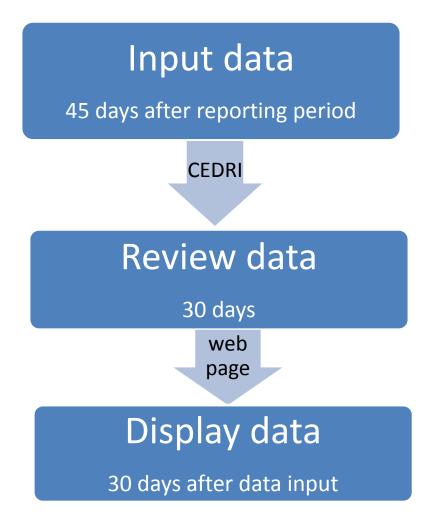


 ΔC for a 2 week period = high - low = 6.3 $\mu g/m^3$ - 0.2 $\mu g/m^3$ = 6.1 $\mu g/m^3$ Action Level = Annual Average $\Delta C < 9 \mu g/m^3$

What are the Benefits of Monitoring to the Public?

- Encouraging early detection and correction of problems before they rise to the corrective action level
- Identifying toxic air emissions from refinery emissions sources such as equipment leaks and wastewater systems
 - Taking advantage of low concentration level sampling technology for hazardous air pollutants emitted by refineries
- Providing information on toxic air emissions to federal, state and local officials and the public
- Providing requirements for refineries to take action to correct toxic air emissions from refinery emission leaks
 - Protecting public health in communities surrounding refineries

Process



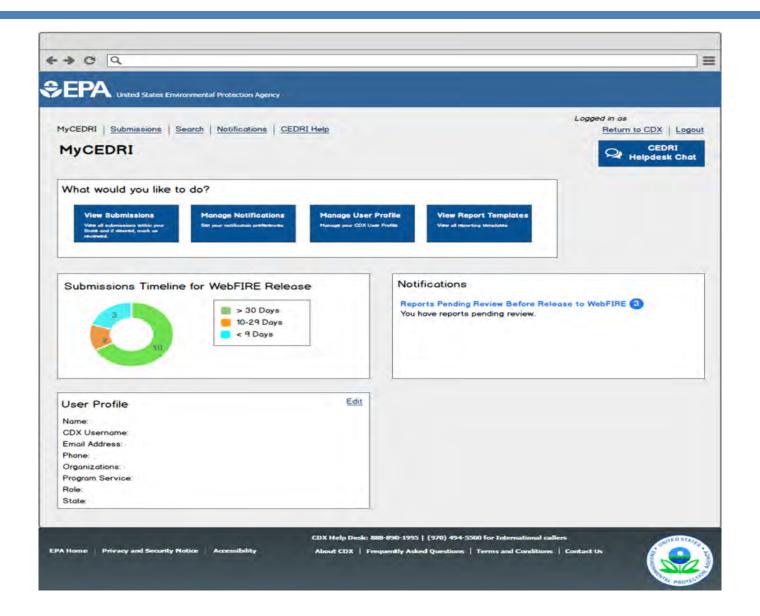
Schedule

Activity	Dates					
Refineries install fenceline monitoring systems	Present – January 29, 2018					
 Refineries begin collecting data Collect 12 months of data to calculate annual average 	January 30, 2018					
Refineries report data to EPA's emissions data system • Refineries continue to report data on quarterly basis • Refineries compare annual average to 9 micrograms per cubic meter	Spring 2019					
 EPA public release of benzene data on web page 30 days after quarterly reporting period ends Data will be refreshed quarterly on EPA's public web page 	Summer 2019					

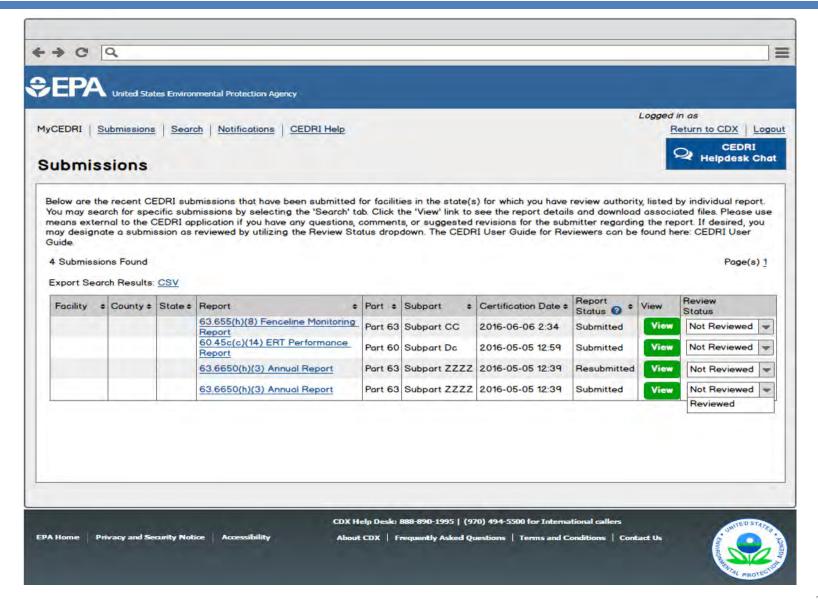
CEDRI

► EPA's Compliance and Emissions Data Reporting Interface

MyCEDRI: Reviewer



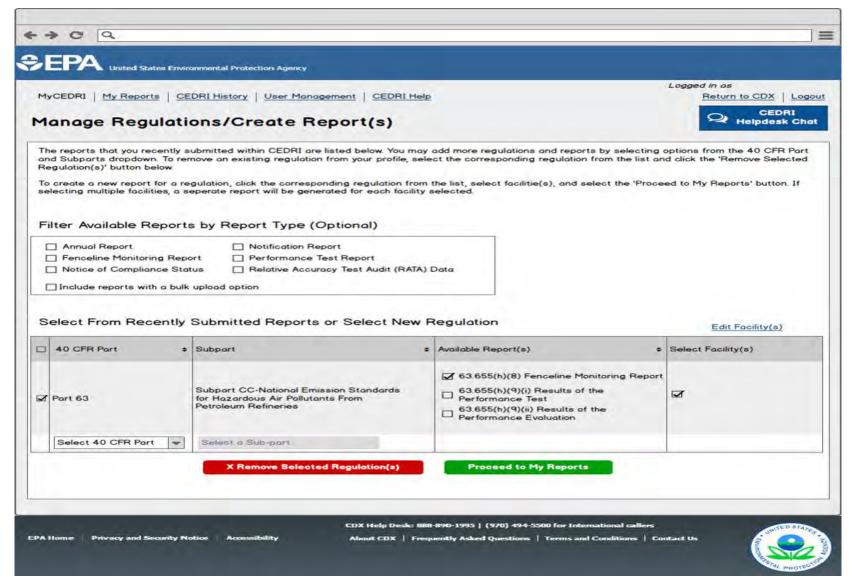
MyCEDRI: Reviewer



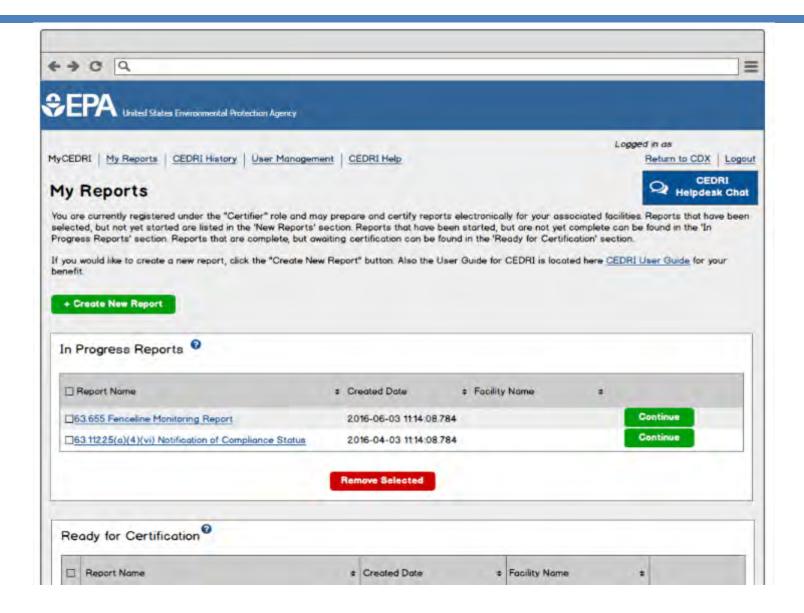
Draft Email Notification for Reviewer

Sent: Wednesday, June 08, 2016 12:43 PM Fo: Subject: CDX CEDRI Dataflow – State Revie		railable to View	
This e-mail is to inform you that the fo "Report Type", and then log into the C		was successfully signed and has reached CEDRI. To view each report in this submission package,	click the link(s) under
Submission Details:			
Submission Date/Time:			
Certifier Name:			
ertifier Organization:			
Certifier Facility:			
facility Address:			
PA Facility Id:			
Submission Id:			
Report Name	Report Type	Regulation Part/Subpart	Public Release
		Part 63 - Subpart CC: National Emission Standards for Hazardous Air Pollutants From	Date
3.655(h)(8) Fenceline Monitoring	Fenceline Monitoring	Petroleum Refineries	07/06/2016
Report	Report		

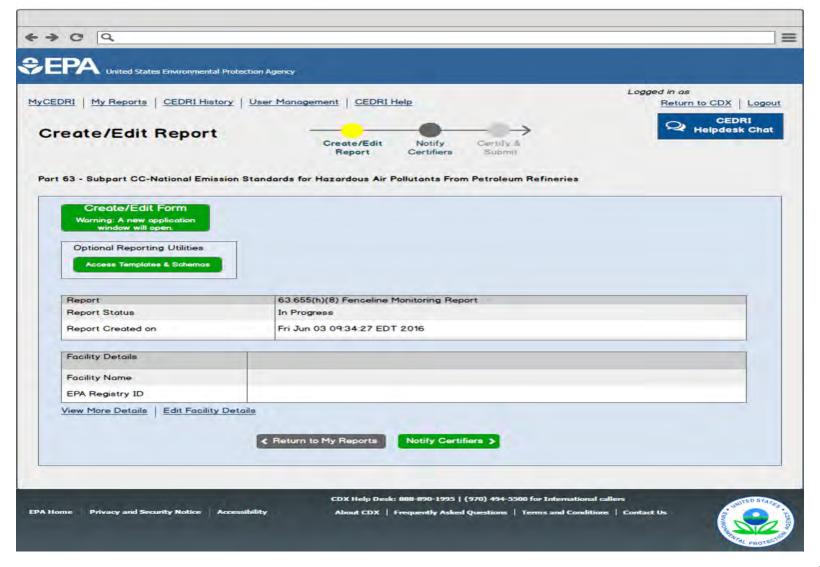
CEDRI – Selecting a Report



CEDRI – Creating a Report

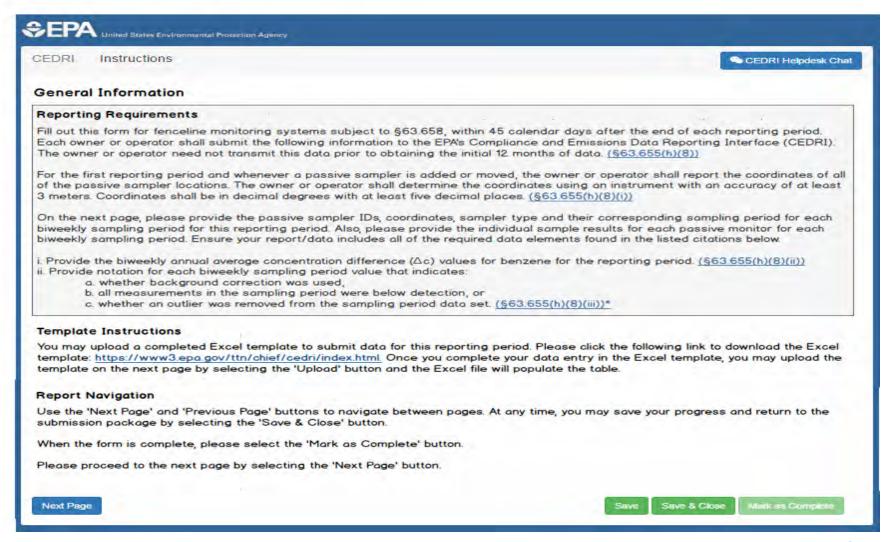


CEDRI – Creating/Editing a Report

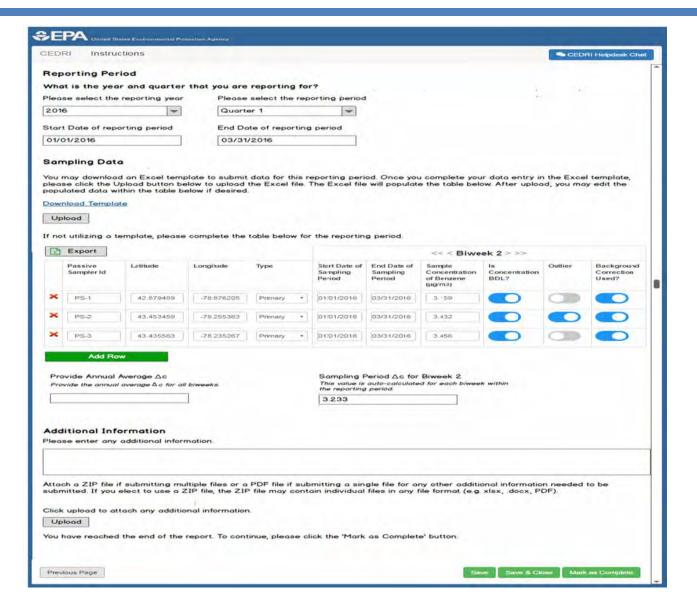


CEDRI – General Information Page

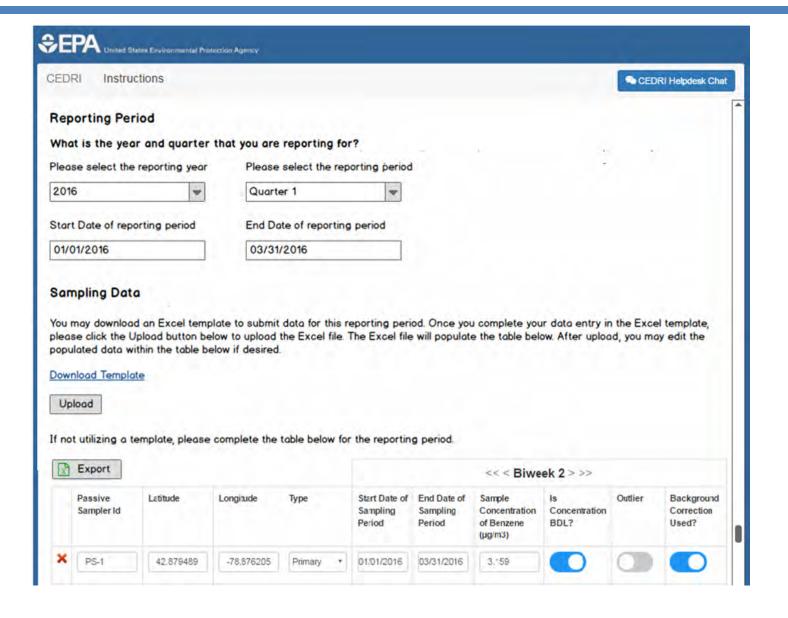
Fenceline Monitoring: Welcome Page



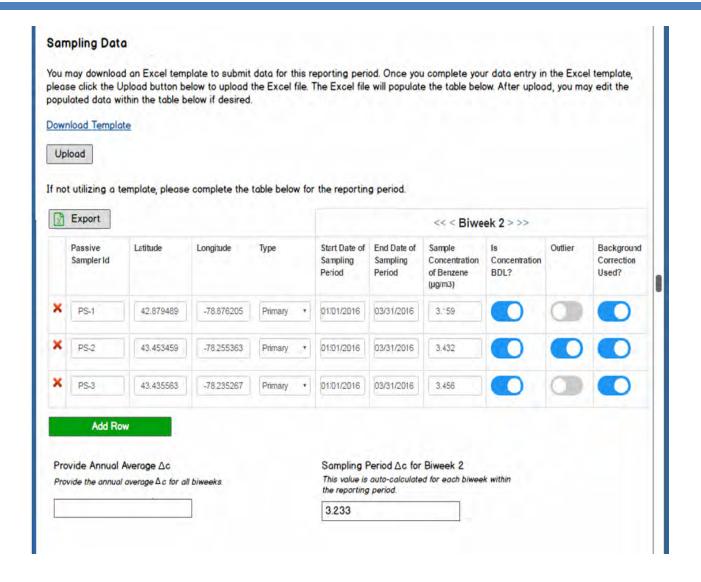
CEDRI - Reporting Period and Sampling Data



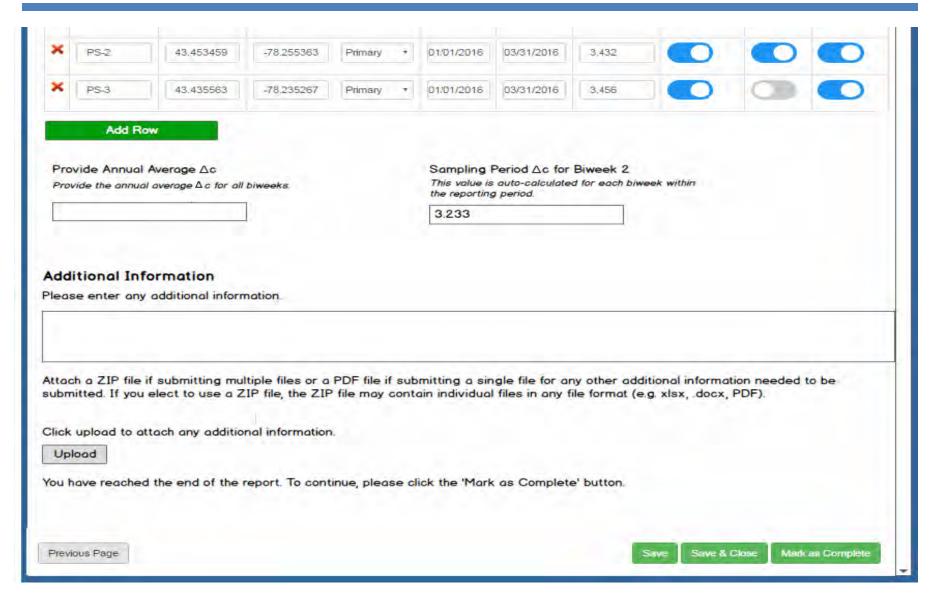
CEDRI – Defining a Reporting Period



CEDRI – Providing Sampling Data



CEDRI – Additional Information



CEDRI – Template

1	Α	I	J	K	N	0	Р	Q	R	S	T	U	V	W	X	Y	Z	AA
1	Passive Sampler ID*	Latitude of Passive Sampler*	Longitude of Passive Sampler*		Biweek Sampling Period 1: Start Date of Sampling Period	Biweek Sampling Period 1: End Date of Sampling Period	Concentration	Biweek Sampling Period 1: <value <p="" column="" in="" provided=""> BDL? #</value>		Biweek Sampling Period 1: Background Correction Used?	Biweek Sampling Period 2: Start Date of Sampling Period	Biweek Sampling Period 2: End Date of Sampling Period	Biweek Sampling Period 2: Sample Concentration of Benzene (μg/m3)		Biweek Sampling Period 2: Outlier Removed?	Biweek Sampling Period 2: Background Correction Used?	Biweek Sampling Period 3: Start Date of Sampling Period	Biweek Sampling Period 3: End Date of Sampling Period
2	PS-1	42.87949	-78.87621	Primary	1/1/2016	3/31/2016	3.153	Yes	No	Yes	1/1/2016	3/31/2016	3.159	Yes	No	Yes	1/1/2016	3/31/2016
3	PS-2	43.45346	-78.25536	Primary	1/1/2016	3/31/2016	3.062	Yes	No	Yes	1/1/2016	3/31/2016	3.432	Yes	Yes	Yes	1/1/2016	3/31/2016
4	PS-3	43.43556	78.23527	Primary	1/1/2016	3/31/2016	3.213	Yes	No	Yes	1/1/2016	3/31/2016	3.456	Yes	No	Yes	1/1/2016	3/31/2016
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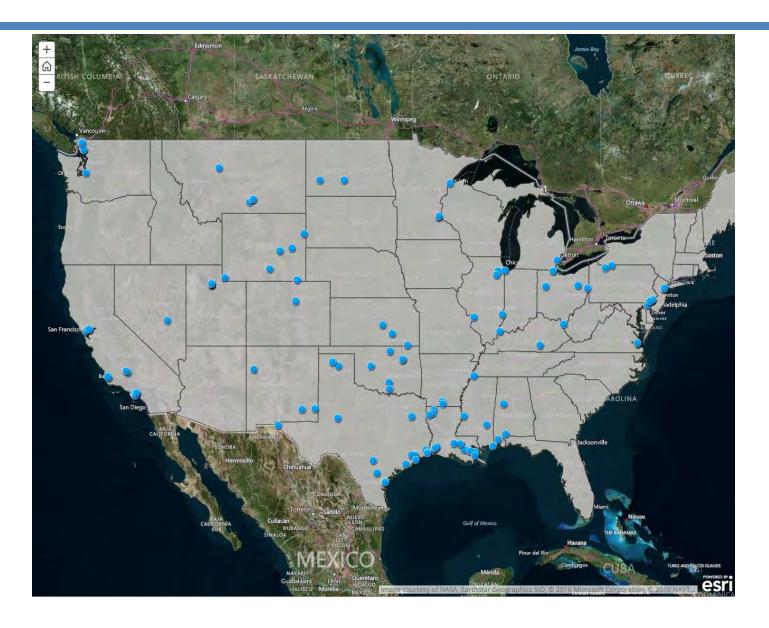
Public Display of Data – Examples

- Public display of data
 - ► EPA is designing a web page to display fenceline refinery data
 - ► Web page will be managed by EPA
 - Design will incorporate stakeholder ideas
 - Available to public in the Summer 2019

Web Page Example



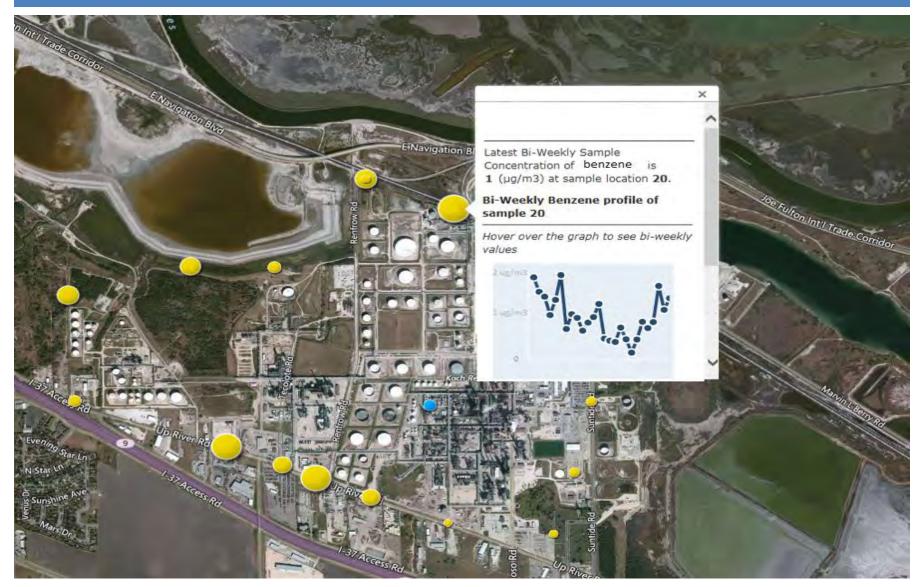
Story Map – Home Page



Facility: Fenceline Monitors

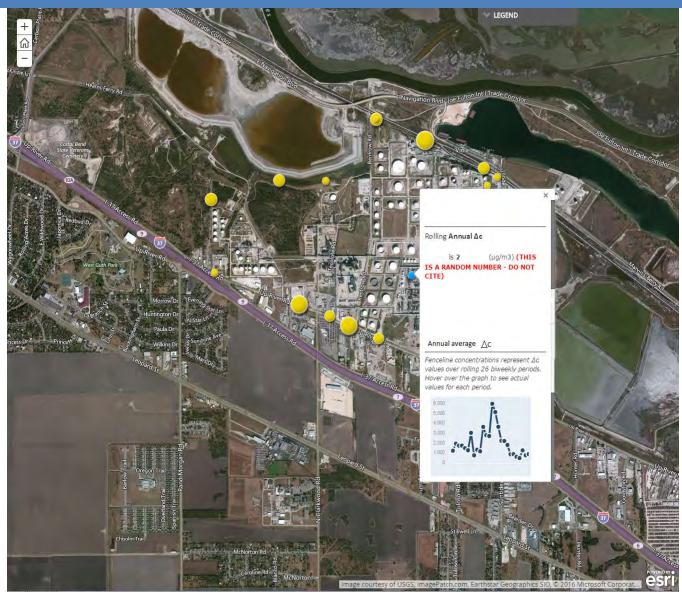


Facility: Individual Fenceline Monitor Pop-up



^{**}data are for demonstration purposes only**

Facility: Facility Wide Pop-up



^{**}data are for demonstration purposes only**

Stakeholder Input

- How to provide your input
 - ► Email: <u>fencelineteam@epa.gov</u>
 - Please send input by July 31, 2016
- ► What information needs to be included on the web page to understand the data?
- Within context of the rule, what information and data on benzene do you want to see on the web page?
- Do you have ideas for other ways to share the information besides a web page?
- What other information would be helpful for you?
 - Other EPA information about air toxics? Links to EPA environmental justice tools?
- Is there other training or support that might be helpful?

Additional Information

For updates and additional information:

https://www3.epa.gov/ttn/atw/petref.html

Appendix

Clean Air Act

- New Source Performance Standards (NSPS)
 - ► CAA Section 111(b) requires to EPA to set and periodically review, emission standards for new sources of criteria air pollutants (CAP), volatile organic compounds (VOC), and other pollutants
- Air Toxics Rules: Maximum Achievable Control Technology (MACT) and Residual Risk and Technology Reviews
 - CAA Section 112(d) requires EPA to set emission standards for hazardous air pollutants (HAP) based on performance of the maximum achievable control technology (MACT)
 - ► EPA is required to conduct two reviews and update the existing standards, if necessary
 - Residual Risk Assessment: To determine whether additional emission reductions are warranted to protect public health or the environment. This is a one-time review.
 - Technology Reviews: To determine if better emission control approaches, practices, or processes are now available. Technology reviews are required every eight years.

Rulemakings

NSPS

- ▶ 1974 NSPS covers fuel gas combustion devices, FCCU and sulfur plants
- 2008 and 2012 NSPS covers same above and delayed cokers, flares and process heaters specifically

MACT

- ▶ 1995 MACT (known as MACT 1) covers non-combustion or evaporative sources, such as equipment leaks, tanks, wastewater, miscellaneous process vents; amended to cover heat exchange systems, including cooling towers
- 2002 MACT (known as MACT 2) covers combustion sources: catalytic cracking units, catalytic reforming units and sulfur recovery units
- Risk and Technology Review (RTR)
 - 2007 proposed risk and technology review amendments for non-combustion sources
 - ▶ 2009 withdrew amendments
 - 2013 promulgated standards for heat exchanger systems
 - 2014 proposed RTR and amendments (79 FR 36880; June 30, 2014)
 - 2015 finalized amendments

Fenceline Monitoring – Monitor Siting

- ▶ 12-24 monitors (based on size of facility) are required around the perimeter of each refinery
 - Additional monitors required if sources are near fenceline
- Monitors will be placed following requirements in EPA Method 325A
- Geographic coordinates for each monitoring location will be reported

Fenceline Monitoring – Data Collection

- At least one sample collected from each individual monitoring location every two weeks
- Samples analyzed for benzene following requirements in EPA Method 325B
- The highest and lowest benzene concentration is identified for each biweek sampling period
- The "delta C (ΔC)" for that monitoring period is calculated as the difference of these two concentrations
- 26 consecutive bi-week ΔC values are averaged to calculate an annual average ΔC value
 - \triangleright Collect benzene data for one year to develop first annual average $\triangle C$ value

Fenceline Monitoring – Data Reporting

- Upon completion of the first year of monitoring, benzene data are reported to EPA through EPA's data management system
 - Includes actual measurements for each 2 week period for each monitoring station
- Refinery owners must maintain the annual average ΔC value at or below 9 micrograms per cubic meter, µg/m³ (2.8 parts per billion by volume, ppbv)