

## Appendix 3a: Community Profile

### Information on the Best Available Retrofit Control Technology and AB 2588 Program

AB 617 requires air districts to implement Best Available Retrofit Control Technology (BARCT) for facilities in the state greenhouse gas cap-and-trade program by December 31, 2023. The San Bernardino, Muscoy community has facilities that are subject to BARCT, specifically larger facilities that are in the REgional Clean Air Incentives Market (RECLAIM) program. In addition, CARB's Blueprint states that facilities located within the community with Risk Reduction Plans under the Assembly Bill (AB) 2588 program must be identified. Descriptions of the facilities that are subject to BARCT (specifically RECLAIM facilities) and the AB 2588 program are provided below.

### Best Available Retrofit Control Technology (BARCT)

#### *RECLAIM facilities*

Facilities within the RECLAIM program are typically larger facilities that have NO<sub>x</sub> emissions greater than four tons per year. The RECLAIM program<sup>1</sup> uses a market-based approach to achieve emission reductions from facilities for nitrogen oxides (NO<sub>x</sub>) and sulfur oxides (SO<sub>x</sub>) in the aggregate. However, an analysis of the RECLAIM program has shown that the ability to achieve NO<sub>x</sub> emission reductions using a market-based approach has diminished; therefore, pursuant to Board direction, RECLAIM NO<sub>x</sub> facilities will transition<sup>i</sup> to a command-and-control regulatory structure to ensure facilities meet BARCT. RECLAIM facilities that are also in the State greenhouse gas cap-and-trade program are subject to the BARCT requirements of AB 617. South Coast AQMD staff completed an analysis of the equipment at each RECLAIM facility, giving higher priority to older, higher polluting units that will need to install retrofit controls. The higher polluting units at RECLAIM facilities will be or have been evaluated for BARCT and will be subject to the following South Coast AQMD rules: Rules 1109.1,<sup>2</sup> 1110.2,<sup>3</sup> 1117,<sup>4</sup> 1118.1,<sup>5</sup> 1134,<sup>6</sup> 1135,<sup>7</sup> 1146, 1146.1, 1146.2,<sup>8</sup> 1147, 1147.1,<sup>9</sup> and 1147.2.<sup>10</sup> A BARCT assessment includes an evaluation of emission limits for existing units, South Coast AQMD regulatory requirements, other regulatory requirements, and pollution control technologies. Table Appendix 3a-1 list the RECLAIM facilities that may be subject to BARCT and whether they are in the State cap-and-trade program.

---

<sup>i</sup> For more information on the RECLAIM transition please see: <http://www.aqmd.gov/home/rules-compliance/reclaim-transition>.

Table Appendix 3a-1: List of NOx RECLAIM facilities within the San Bernardino, Muscoy community

RECLAIM Facility Name	Facility Address	Cap-and-Trade Facility (Yes/No)
MARS PETCARE U.S., INC.	2765 LEXINGTON WAY SUITE 400, SAN BERNARDINO	No

#### *Non-RECLAIM facilities*

As a result of the BARCT assessment conducted for RECLAIM facilities, some equipment at non-RECLAIM facilities will also be affected and will be required to meet BARCT NOx emissions. The BARCT assessment is still currently being conducted for a number of rules and the list of affected non-RECLAIM facilities that may be subject to additional requirements is being developed.

#### AB 2588 Program

The AB 2588 Program<sup>11</sup> is a statewide program that requires air districts to establish emissions inventory of air toxics from individual facilities.<sup>ii</sup> The AB 2588 program is implemented in South Coast AQMD through Rule 1402 – Control of Toxic Air Contaminants from Existing Sources<sup>12</sup> which requires certain facilities to conduct Health Risk Assessments to assess the health risk (long-term versus short-term) to the surrounding community. Facilities are required to submit Health Risk Assessments<sup>13</sup> based upon the toxicity and volume of toxic air contaminants released within proximity to potential receptors (e.g., hospitals, residences, work sites). Depending on the risk, facilities may be required to do public notices and hold a public meeting. If a facility is determined to exceed the significant risk level, as determined by each air district, they are required to reduce this risk by submitting a Risk Reduction Plan (RRP).<sup>14</sup> The RRP outlines what measures (e.g., high-efficiency particulate air (HEPA) filters) the facility will incorporate to reduce their risk. (Some facilities may be subject to the AB 2588 program, but do not exceed the action risk threshold and therefore are not required to submit a RRP.) Some facilities may also choose to voluntarily reduce their risk by submitting a voluntary RRP (VRRP).<sup>iii</sup> If a facility has an approved VRRP, the risks will be reduced below the voluntary risk threshold. Table Appendix 3a-2<sup>iv</sup> shows facilities within the San Bernardino, Muscoy community that are currently in the AB 2588 program in the South Coast AQMD. This table includes the facility name, location address, and the most recent status under the AB 2588 program. Facilities in the AB 2588 program without

<sup>ii</sup> The South Coast AQMD's AB 2588 Program incorporates the requirements of the state AB 2588 program, as well as additional and/or more stringent requirements.

<sup>iii</sup> Some facilities may have submitted applications for a VRRP; however, if the facility is found to be already under the voluntary risk threshold, no further reduction measures are required.

<sup>iv</sup> Facilities listed in the table are reducing risk or in the process of reducing risk.

a RRP or VRRP will have the prioritization level (High, Intermediate, or Low)<sup>v</sup> and what year the prioritization was conducted listed as the status. Prioritization is based on reporting every four years.

Table Appendix 3a-2: List of facilities in the AB 2588 program within the San Bernardino, Muscoy community

Facility Name	Facility Address	Status within the AB 2588 Program
ST. BERNARDINE MEDICAL CENTER	2101 N WATERMAN AVE, SAN BERNARDINO	Prioritization from 2017 - Intermediate
CALMAT CO	2400 W HIGHLAND AVE, SAN BERNARDINO	Prioritization from 2017 - Low

References

1. South Coast AQMD, RECLAIM, <http://www.aqmd.gov/home/programs/business/business-detail?title=reclaim>, Accessed July 29, 2019.
2. South Coast AQMD, PR 1109.1: Refinery Equipment, <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules#1109.1>, Accessed July 29, 2019.
3. South Coast AQMD, PAR 1110.2: Emissions from Gaseous and Liquid-Fueled Engines, <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules#1110.2>, Accessed July 29, 2019.
4. South Coast AQMD, Rule 1117: Emissions of Oxides of Nitrogen from Glass Melting Furnaces, <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1117.pdf>, Accessed July 30, 2019.
5. South Coast AQMD, PR 1118.1: Control of Emissions from Non-Refinery Flares, <https://www.aqmd.gov/home/rules-compliance/compliance/r1118-1>, Accessed July 29, 2019.
6. South Coast AQMD, PAR 1134: Emissions of Oxides of Nitrogen, <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules#1134>, Accessed July 29, 2019.
7. South Coast AQMD, PAR 1135: Emissions of Oxides of Nitrogen from Electricity Generating Facilities, <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules#1135>, Accessed July 29, 2019.

<sup>v</sup> Facilities designated as high priority are required to submit Heath Risk Assessments to assess the risk to their surrounding community. Facilities ranked as Intermediate priority are required to submit a complete toxics inventory once every four years. Facilities ranked as low priority are exempt from reporting.

8. South Coast AQMD, PAR 1146, 1146.1, 1146.2: Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters; Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters; Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters; and - Implementation Schedule for NOx Facilities, <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules#1146>, Accessed July 29, 2019.
9. South Coast AQMD, PAR 1147, 1147.1: NOx Reductions from Miscellaneous Sources, NOx Reductions from Large Miscellaneous Combustion, <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules#1147>, Accessed July 29, 2019.
10. South Coast AQMD, PAR 1147.2: NOx Reductions from Metal Processing Equipment, <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules#1147.2>, Accessed July 29, 2019.
11. South Coast AQMD, Air Toxics “Hot Spots” Program (AB 2588), <http://www.aqmd.gov/home/rules-compliance/compliance/toxic-hot-spots-ab-2588>, Accessed July 19, 2019.
12. South Coast AQMD, Rule 1402 – Control of Toxic Air Contaminants from Existing Sources, <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1402.pdf>, Accessed August 9, 2019.
13. South Coast AQMD, Health Risk Assessment, <http://www.aqmd.gov/home/rules-compliance/compliance/toxic-hot-spots-ab-2588/health-risk-assessment>, Accessed July 19, 2019.
14. South Coast AQMD, Risk Reduction, <http://www.aqmd.gov/home/rules-compliance/compliance/toxic-hot-spots-ab-2588/risk-reduction>, Accessed July 19, 2019.