



## California Council for Environmental and Economic Balance

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September 12, 2023

Joshua Ewell  
Planning, Rule Development, and Implementation  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

Re: Proposed Amended Rule 2011 – Requirements for Monitoring, Reporting, and Recordkeeping for Oxides of Sulfur (SO<sub>x</sub>) Emissions; and Proposed Amended Rule 2012 – Requirements for Monitoring, Reporting, and Recordkeeping for Oxides of Nitrogen (NO<sub>x</sub>) Emissions

Dear Mr. Ewell,

On behalf of the members of the California Council for Environmental and Economic Balance (CCEEB), we submit these comments in support of the South Coast Air Quality Management District's Proposed Amended Rule 2011 and Proposed Amended Rule 2012. CCEEB has been a longstanding stakeholder engaged in the District's RECLAIM program to which these proposed amendments would apply.

PAR 2011 and PAR 2012 will address a potential conflict that could occur when facilities are implementing the so-called landing rules under the RECLAIM program. For example, if compliance with a landing rule requires a facility to remove or modify a stack that contains a Continuous Emission Monitoring Systems (CEMS) unit, that facility would need to shut down the CEMS unit. However, currently, Rules 2011 and 2012 require the installation and operation of CEMS units at RECLAIM facilities without exception, leading to an inability to comply with both the landing rules as well as Rules 2011 and 2012. For non-RECLAIM facilities, existing District regulations have provisions to address this concern; however, these provisions do not apply to RECLAIM facilities.

We believe PAR 2011 and PAR 2012 provide technical changes to existing rule language that will address this situation while including safeguards to ensure that there will be no adverse impact on air quality.

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We thank the staff for quickly moving to develop a proposed solution. CCEEB supports PAR 2011 and PAR 2012 and will urge the Governing Board to approve these proposals.

Sincerely,



Bill Quinn  
CCEEB Consultant

cc: Michael Krause, SCAQMD  
Tim Carmichael, CCEEB  
Christine White, CCEEB  
Members, South Coast Air Project