NOx RECLAIM WORKING GROUP MEETING

FEBRUARY 18, 2021
JOIN ZOOM MEETING
HTTPS://SCAQMD.ZOOM.US/J/97332779341
MEETING ID: 973 3277 9341
PASSCODE: 945220
TELECONFERENCE DIAL-IN: 1-669-900-6833
Agenda

- Rulemaking Status on Landing Rules
- Summary of Comment Letters on the RECLAIM Transition Plan
- Ongoing Efforts and Next Steps
RULEMAKING STATUS ON LANDING RULES
Rules Under Development

PAR 218 and PR 218.2/218.3 – Continuous Emissions Monitoring Systems
Public Hearing: March 5, 2021

PR 1147.1 – Aggregate Facilities
Public Hearing: June 4, 2021

PAR 1147 – Miscellaneous Combustion Sources
Public Hearing: October 1, 2021

PR 1147.2 – Metal Melting and Heating Furnaces
Public Hearing: August 6, 2021

PR 1159.1 – Nitric Acid Processing Tanks
Public Hearing: November 5, 2021

PAR 1153.1 – Commercial Food Ovens
Public Hearing: December 3, 2021

PR 1109.1 – Refinery Equipment
Public Hearing: June 4, 2021
PAR 218 and PR 218.2 & 218.3 – Requirements for Continuous Emissions Monitoring Systems

- Consolidated CEMS requirements for non-RECLAIM and former RECLAIM facilities
- Tiered transition period for implementation
- Proposed amended rules and Draft Staff Report available on February 3, 2021
- Public Workshop conducted on January 6, 2021
- Public Hearing: March 5, 2021

* No amendments needed for Rule 218.1
PAR 1147 – Miscellaneous Combustion Sources

- Working Group Meeting held November 12, 2020
- Working with equipment vendors and burner manufacturers
- Cost-effectiveness analysis for remaining equipment categories anticipated to be presented at the next Working Group Meeting
- Next Working Group Meeting: March 2021
- Public Hearing: October 1, 2021
PR 1147.1 – Aggregate Facilities

- Working Group Meeting held on January 20, 2021
- Aggregate facilities will remain in PR 1147.1 instead of incorporating into PAR 1147
- Next Working Group Meeting: February 24, 2021
- Public Hearing: June 4, 2021
PR 1147.2 – Metal Melting and Heating Furnaces

- Working Group Meeting held on February 2, 2021
- Presented cost-effectiveness for all categories and implementation approach
- Next Working Group Meeting: March 2021
- Public Hearing: August 6, 2021
PR 1109.1 – Refinery Equipment

- Revisiting BARCT limit for heaters and boilers >40 MMBtu/hr
- Continuing to work on issues raised by stakeholders
- Ongoing meetings with stakeholders
- Start-up and shutdown provisions will be addressed in separate rule (PR 429.1)
- Working Group Meetings held on February 4, 2021 and February 11, 2021
- Stationary Source Committee: September 18, 2020 and February 19, 2021
- Next Working Group Meeting: March 2021
- Public Hearing: June 4, 2021
PR 1159.1 – Nitric Acid Processing Tanks

- Addresses NOx emissions from nitric acid processing tanks
- Staff in data gathering phase
- Public Hearing: November 5, 2021

https://tri-mer.com/tanks/polypro-tanks-case-study.html
Staff identified six RECLAIM facilities which operate food ovens, smokers, or dryers that will be subject Rule 1153.1

BARCT analysis is needed

Food ovens at RECLAIM facilities will become subject to the requirements of Rule 1153.1

Public Hearing: December 3, 2021
Emission Reductions (Tons per Day*)

<table>
<thead>
<tr>
<th>Rule Description</th>
<th>Reductions</th>
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<tbody>
<tr>
<td>Rules 1146, 1146.1, 1146.2 – Boilers, heaters, and steam generators</td>
<td>0.27</td>
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<tr>
<td>Rule 1118.1 – Non Refinery Flares</td>
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<tr>
<td>Rule 1134 – Gas Turbines</td>
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<td>Rule 1135 – Electric Generating Facilities</td>
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<td>Rule 1110.2 – Gaseous- and Liquid-Fueled Engines</td>
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<tr>
<td>Rule 1117 – Container Glass Melting/Sodium Silicate Furnaces</td>
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</table>

Total NOx Reductions = 4.63 tons per day*

*Sum of NOx reductions from RECLAIM facilities only
COMMENT LETTERS ON THE RECLAIM TRANSITION PLAN
Comment Letters

- Five comment letters were received from:
  - California Council for Environmental and Economic Balance (CCEEB)
  - Latham & Watkins on behalf of the Regulatory Flexibility Group (RFG)
  - Los Angeles Department of Water & Power (LADWP)
  - Torrance Refining Company LLC (TORC)
  - Western States Petroleum Association (WSPA)
- Comment letters are available on the proposed rules webpage¹
- Staff will respond to comments on the RECLAIM Transition Plan at the March Working Group Meeting

RECLAIM Topics in Comment Letters

- Characterization of the effectiveness of NOx RECLAIM
- Disproportionate impacts for RECLAIM facilities having to comply with landing rules while in RECLAIM
- Quantification of emission reductions from landing rules and shave projects
- General agreement with programmatic demonstration for 12 tpd and implementation of CMB-05
- AB 617 requirements related to RECLAIM transition and BARCT requirements
RECLAIM Topics in Comment Letters (continued)

- Specific landing rule concerns (PAR 218 and PR 218.2/218.3, PR 1109.1)
- Start-up, shutdown, and malfunction
- BARCT assessment
  - $50,000/ton threshold
  - Retrofit versus replacement
  - Case-by-case analysis
- Alternative emission control plans
- Cost-effectiveness assumptions and calculations
- Incremental cost-effectiveness approach
New Source Review Topics in Comment Letters

- Offset quantification and availability
- Applicability Test
- Co-pollutant strategy
- Scope of NSR changes
- Surplus discount
Permitting in Comment Letters

- Retain the facility permit structure
- Permitting fees should be as reasonable as possible
- Need stronger assurance that exiting RECLAIM is not an NSR event
- General agreement to address the ammonia slip limit during permitting
- General agreement to retain RECLAIM MRR in Title V permits during the transition (prior to exiting RECLAIM)
Ongoing Efforts and Next Steps

- Continue rulemaking activities
- Continue working with U.S. EPA, CARB, and stakeholders
- Monthly RECLAIM and Regulation XIII NSR Working Group Meetings
- Quarterly Stationary Source Committee updates
- Respond to comment letters on the RECLAIM Transition Plan at the next working group meeting
# Contacts

| General Questions | | General RECLAIM Questions |
|-------------------|------------------|
| **Susan Nakamura**<br>Assistant Deputy Executive Officer<br>909-396-3105<br>snakamura@aqmd.gov | | **Gary Quinn, P.E.**<br>Program Supervisor<br>909-396-3121<br>gquinn@aqmd.gov |
| **Isabelle Shine**<br>Air Quality Specialist<br>909-396-3064<br>ishine@aqmd.gov | | **Uyen-Uyen Vo**<br>Program Supervisor<br>909-396-2238<br>uvo@aqmd.gov |
| **Michael Morris**<br>Planning and Rules Manager<br>909-396-3282<br>mmorris@aqmd.gov | | **Lizabeth Gomez**<br>Air Quality Specialist<br>909-396-3103<br>lgomez@aqmd.gov |

To receive e-mail notifications for Regulation XX or Regulation XIII, sign up at: [www.aqmd.gov/sign-up](http://www.aqmd.gov/sign-up)
# Rule Contacts – Proposed Amended/Adopted

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<tr>
<th>Rule</th>
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<tr>
<td>Proposed Rule 1109.1</td>
<td>Heather Farr</td>
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<td>Program Supervisor</td>
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<td>Sarady Ka</td>
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