NOx RECLAIM WORKING GROUP MEETING

APRIL 15, 2021
JOIN ZOOM MEETING
HTTPS://SCAQMD.ZOOM.US/J/93109899879
MEETING ID: 931 0989 9879
PASSCODE: 298663
TELECONFERENCE DIAL-IN: 1-669-900-6833
Agenda

- Rulemaking Status on Landing Rules
- Additional Comment from U.S. EPA Regarding the Transition
- Ongoing Efforts and Next Steps
RULEMAKING STATUS ON LANDING RULES
Rules Under Development

PR 1147.1 – Aggregate Facilities
Public Hearing: August 6, 2021

PR 1147.2 – Metal Melting and Heating Furnaces
Public Hearing: October 1, 2021

PR 1109.1 – Refinery Equipment
Public Hearing: September 3, 2021

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

PAR 1147 – Miscellaneous Combustion Sources
Public Hearing: December 3, 2021

PAR 1153.1 – Commercial Food Ovens
Public Hearing: December 3, 2021
PAR 1147 – Miscellaneous Combustion Sources

- Previous Working Group Meeting held March 10, 2021
- 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: May
- Public Hearing: December 3, 2021
PR 1147.1 – Aggregate Facilities

- Working Group Meeting held on March 11, 2021
- Staff met with industry representatives in April
- Proposed rule language anticipated at next Working Group Meeting
- Next Working Group Meeting: April
- Public Hearing: August 6, 2021
PR 1147.2 – Metal Melting and Heating Furnaces

- Working Group Meeting held on February 2, 2021
- Meeting with facilities to obtain more information
- Next Working Group Meeting: Late April
- Public Hearing: October 1, 2021
Next Working Group Meeting: Late April

Revised cost data from facilities submitted

Staff currently reassessing proposed BARCT limits, cost-effectiveness, and incremental cost-effectiveness for:

- Heaters and boilers (>40 MMBtu/hr)
- FCCU with existing SCRs
- Vapor incinerators and thermal oxidizers

Ongoing meetings to address issues and concerns from stakeholders

Start-up and shutdown provisions will be addressed in separate rule (PR 429.1) with the PR 1109.1 Working Group

Public Hearing moved to September 3, 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 to Proposed Amended Rule 1153.1

Staff in data gathering phase

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

Public Hearing: December 3, 2021
Adopted/Amended Rules for RECLAIM Transition and NOx Reductions

Total NOx Reductions = 4.63 tons per day*

* Sum of NOx reductions from RECLAIM facilities only. Some NOx reductions may be attributed to the 2015 RECLAIM shave.
Landing Rules Staff is Revisiting

- Staff is proposing amendments for landing rules that have been adopted or amended to address:
  - Ammonia slip limits
  - Startup and shutdown provisions
  - References to Rules 218.2 and 218.3 for CEMS
- The following rules are scheduled for amendments:
  - Proposed Amended Rule 1134 – Emissions of Oxides of Nitrogen from Stationary Gas Turbines (August 2021)
  - Proposed Amended Rule 1135 – Emissions of Oxides of Nitrogen from Electricity Generating Facilities (August 2021)
ADDITIONAL COMMENT FROM U.S. EPA REGARDING THE TRANSITION
U.S. EPA has commented as facilities transition out of RECLAIM there needs to be an interim BARCT requirement until implementation of BARCT requirements in applicable landing rules.

Clean Air Act Section 110(l) prohibits the U.S. EPA from approving a revision to a SIP if the revision would interfere with any applicable requirement concerning attainment.

- RECLAIM currently establishes BARCT in aggregate.
- BARCT implementation dates vary in landing rules.
  - Implementation dates for some equipment will extend beyond the date facilities are expected to transition out of RECLAIM.
Current RECLAIM Timeline

- Based on input from U.S. EPA, RECLAIM facilities cannot be transitioned out of RECLAIM until U.S. EPA approves Regulation XIII, Regulation XX, and landing rules
  - Facilities are not expected to be able to exit RECLAIM before January 1, 2023, and more likely around January 1, 2024
  - Several landing rules and proposed landing rules contain implementation dates beyond January 1, 2024
- Staff is considering options to address U.S. EPA’s comments to ensure compliance with Section 110(l) of the Clean Air Act
- Staff is seeking input from stakeholders
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
## Contacts

### General Questions
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### General RECLAIM Questions
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- **Isabelle Shine**  
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### New Source Review
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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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