NOx RECLAIM WORKING GROUP MEETING

SEPTEMBER 12, 2019
SOUTH COAST AQMD
DIAMOND BAR, CA
CALL-IN # 1-866-705-2554
PASSCODE: 5796457
Agenda

- Process moving forward for RECLAIM and New Source Review Working Group Meetings
- Rulemaking Status of Landing Rules
- Update on Equivalency Demonstration (CAA 110(l))
- Update on Discussions with U.S. EPA on New Source Review
Two Working Group Meetings: RECLAIM and Regulation XIII
Plan to schedule both Working Group Meetings on the same day – back to back

RECLAIM Working Group Meetings
- Issues specific to NOx RECLAIM transition
- Updates on Landing Rules
- Regulation XX Rule Amendments

Regulation XIII Working Group Meetings
- New Source Review issues post-RECLAIM (Former RECLAIM and Non-RECLAIM)
- Address future supply and demand of offsets
- Regulation XIII Rule Amendments
RULEMAKING STATUS
Rulemaking Status

PAR 1110.2
Gaseous- and Liquid-Fueled Engines
• Maintaining existing NOx concentration limits
• Adding ammonia slip 5 ppm
• Public Hearing: November 2019

PR 1109.1
Refinery Equipment
• Board approved contracts for two third party consults for review of BARCT assessment
• Meetings with technology vendors, conducting site visits, and working with consultants
• Public Hearing: 2nd Quarter 2020

PAR 218 & 218.1
Monitoring, Reporting, and Recordkeeping – Continuous Emissions Monitoring Systems
• Applicable to non-RECLAIM and RECLAIM facilities
• Specifying CEMS requirements and performance standards
• Public Hearing: 1st Quarter 2020

PAR 1117
Glass Melting Furnaces
• Affects 2 facilities
• Both using new pollution control systems
• Public Hearing: 1st Quarter 2020
**Rulemaking Status (Continued)**

**PAR 1147**
- Miscellaneous Combustion Sources
  - Conducting BARCT analysis
  - Presenting permitting and source test data
  - Meeting with burner manufacturers
  - Public Hearing: 1st Quarter 2020

**PR 1147.1**
- Large Miscellaneous Combustion Sources
  - Conducting BARCT analysis
  - Presenting permitting and source test data
  - Meeting with burner manufacturers
  - Public Hearing: 1st Quarter 2020

**PR 1147.2**
- Metal Processing Equipment
  - Conducting BARCT analysis
  - Presenting permitting and source test data
  - Meeting with burner manufacturers
  - Public Hearing: 1st Quarter 2020

**PR 1147.3**
- Aggregate Facilities
  - Staff in data gathering phase
  - Public Hearing: 3rd Quarter 2020
UPDATE ON NEW SOURCE REVIEW
South Coast AQMD staff met with U.S. EPA Region IX staff on August 15, 2019

Discussed several issues pertaining to the RECLAIM transition and New Source Review (NSR):

- Rulemaking status
- RECLAIM transition - Federal CAA 110(l)
- Confirmation of NSR applicability and offsetting recommendations for new and modified sources (Reg XIII presentation)
- Initial concepts for reducing the demand for offsets
On December 4, 2015, the Board adopted NOx RECLAIM amendments. These amendments resulted in a phased reduction of NOx allocations beginning in 2016 and continuing through 2022. Overall, NOx reductions will be 12 tons per day (tpd) when fully implemented in 2022 and beyond. Federal CAA 110(l) requires an equivalency demonstration of this SIP commitment for RECLAIM to achieve the 12 tpd NOx shave.
SIP Commitment

- In 2022, total RTC allocations for RECLAIM will be 14.5 tons per day (tpd) after the 12 tpd shave.
Approach for Federal CAA 110(l) Equivalency Demonstration

- Based on discussions with U.S. EPA, staff is recommending a one-time, programmatic equivalency demonstration as part of the SIP submittal package for the RECLAIM transition.
- Actual emissions from RECLAIM facilities would be compared to the 14.5 tpd at time of SIP submittal of all rules:
  - Regulation XX – RECLAIM
  - Landing Rules
  - Regulation XIII – New Source Review
- If actual emissions > 14.5 tpd:
  - Projection of actual emissions will be made to reflect implementation of landing rules with future effective dates.
  - Projection will indicate when emissions will be below 14.5 tpd.
SB 288 Demonstration

- SB 288 prohibits agencies from changing their NSR requirements to be less stringent than those that existed in 2002
- RECLAIM NSR requires facilities that entered after the start of the program\(^1\) to hold RTCs equal to their PTE at the beginning of each compliance year
- 14.5 tpd RTC allocation is sufficient to cover the holding requirements for these facilities
- Staff is proposing a similar approach as the federal equivalency demonstration
  - One-time demonstration that actual emissions will be below the 14.5 tpd RTC allocation with the implementation of command-and-control rules
  - Staff is still working with CARB on this approach

\(^1\) Also applies to facilities with emission increases above their starting allocation
Additional 5 tpd of NOx by 2025 (CMB-05)

- 2016 AQMP Control Measure CMB-05 proposed further NOx reduction of 5 tpd by 2025 from RECLAIM facilities
- Historically, implementation of control measures has not had a mass emission demonstration requirement
- U.S. EPA and South Coast AQMD agree that a mass emission demonstration is not necessary for the additional 5 tpd NOx reductions
- Reductions will be achieved through implementation of command-and-control rules with an emission standard or concentration limit, not mass emissions
Separate meetings for RECLAIM and Regulation XIII – NSR

One-time demonstration for Federal CAA 110(l) and SB 288 compliance as part of the SIP submittal for RECLAIM transition
  - Staff will continue discussions with CARB for SB 288 compliance

2016 AQMP Control Measure CMB-05 reductions will be achieved through command and control rules
  - Mass emission demonstration is not necessary for this control measure
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## Rule Contacts – Amended/Adopted

### Rule 1134 & Rule 1135

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### Rules 1146, 1146.1, & 1146.2

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### Rule 1118.1

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