Proposed Amended Rule 2011 – Requirements for Monitoring, Reporting, and Recordkeeping for Oxides of Sulfur (SOx) Emissions And Proposed Amended Rule 2012 – Requirements for Monitoring

Proposed Amended Rule 2012 – Requirements for Monitoring, Reporting, and Recordkeeping for Oxides of Nitrogen (NOx) Emissions



PUBLIC WORKSHOP AUGUST 29, 2023

Join Zoom Webinar Meeting – from PC or Laptop https://scaqmd.zoom.us/j/98416204068 Zoom Webinar ID: 984 1620 4068 (applies to all) Teleconference Dial-In: +1-669-444-9171

Background

- Rules 2011 & 2012 establish specifications for the installation and operation of CEMS for SOx and NOx, respectively, at RECLAIM facilities
 - Currently Rules 2011 & 2012 offer limited compliance options for the extended shutdown of CEMS when the equipment they monitor is not in operation or generating emissions
- As RECLAIM facilities are modifying and replacing equipment to comply with the new landing rules, there is a need for revised compliance guidelines under extended CEMS shutdown scenarios
- In 2021, the Governing Board adopted Rule 218.2 Continuous Emission Monitoring System: General Provisions (Rule 218.2) to update CEMS requirements and to prepare for the transition of RECLAIM facilities to a command-and-control regulatory program
- The proposed amendments provide more efficient methods to validate emission hours as zero value data points without relying on permit applications or hearing board variances

Proposed Amended Rule 2011 (PAR 2011) and Proposed Amended Rule 2012 (PAR 2012) will include provisions based on Rule 218.2 paragraphs (e)(3) and (e)(4) to offer RECLAIM facilities another path for compliance under extended CEMS shutdown scenarios

Extended Shutdown Scenario



Monitored equipment is nonoperational and disconnected for an extended period (at least 168 consecutive hours) The CEMS has no emission source to monitor (emissions are verified as zero) so it may be offline while the monitored equipment is shutdown

Overview of CEMS Rules



Proposed Conditions Applicable to Extended Shutdowns

- The proposed amendments to Rules 2011 & 2012 are contained in paragraphs (e)(9) and (e)(10) and paragraphs (g)(9) and (g)(10), respectively
- Paragraphs (e)(9) and (g)(9) explain the conditions under which facility permit holders are not subject to the operating and reporting conditions for CEMS in subparagraphs (c)(2)(A), (c)(2)(B), and (c)(3)(A) and validates the emission hours as zero value data points
 - Unit must be non-operational for an extended period (at least 168 consecutive hours)
 - CEMS must operate for a minimum of 4 hours and show zero emissions before shutdown
 - The proper report must be submitted to the South Coast AQMD
 - Before normal operation resumes, the CEMS must be calibrated and run for a minimum 4 hours before any emissions are generated

Demonstrating Zero Emissions and Potential Recertification

 Paragraphs (e)(10) and (g)(10) outline the options available to consider a unit non-operational

- Disconnecting fuel lines and placing blind flange(s)
- Providing fuel bills
- Demonstrating no fuel flow based on a dedicated fuel flow meter
- Demonstrating exhaust flow is less than the lowest quantifiable rate
- Executive Officers written approval

CEMS recertification may be necessary after some extended shutdown scenarios

Facility permit holders must follow all applicable permitting and certification procedures

Costs, Emission Reductions, Cost-Effectiveness, Incremental Cost-Effectiveness, and Socioeconomic Assessment

Costs

• The provisions in PAR 2011 and PAR 2012 are not expected to impose any additional costs

Emission Reductions

- No emission reductions from PAR 2011 and PAR 2012
- The proposed amendments are procedural and offer technical guidelines for compliance

Cost-Effectiveness and Incremental Cost-Effectiveness

- H&SC Section 40920.6 requires a cost-effectiveness analysis when establishing BARCT requirements and an incremental cost-effectiveness analysis for BARCT rules when there is more than one control option
- PAR 2011 and PAR 2012 are not BARCT rules, so this provision does not apply

Socioeconomic Assessment

 The proposed amendments to Rule 2011 and 2012 are administrative in nature and do not result in any adverse socioeconomic impacts

California Environmental Quality Act (CEQA)

The proposed project (PAR 2011 and PAR 2012) provides updates to technical guidelines for operating CEMS as required by South Coast AQMD rules or permit conditions without requiring physical modifications to occur

The proposed project qualifies for an exemption from CEQA pursuant to CEQA Guidelines Section 15061 (b)(3) – Common Sense Exemption, which exempts activities where it can be seen with certainty that there is no possibility that the activities many have a significant adverse effect on the environment

A Notice of Exemption will be prepared, and if the proposed project is approved, it will be filed for posting with the county clerks of Los Angeles, Orange, Riverside, and San Bernardino counties, and with the State Clearinghouse of the Governor's Office of Planning and Research

Next Steps

End of Comment Period	September 12, 2023
Stationary Source Committee	September 15, 2023
Set Hearing	October 6, 2023
Public Hearing	November 3, 2023

Contacts

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General Questions

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For more information, visit: <u>Regulation XX Proposed Rules</u> Page

