

Public Workshop on Developing Expedited BARCT Implementation Schedule

November 1, 2018
webcast@valleyair.org

San Joaquin Valley Air Pollution Control District

AB 617 Background

Under AB 617:

- Accelerated retrofit of pollution controls on industrial sources
- Districts located in non-attainment areas to perform a BARCT analysis of existing rules and regulations
 - Valley is designated as serious nonattainment for the PM_{2.5} National Ambient Air Quality Standard (NAAQS) and extreme nonattainment for the 8-hour ozone NAAQS
- Must adopt, by January 1, 2019, an expedited schedule for evaluating and implementing BARCT
 - Applies to industrial sources subject to state's Cap-and-Trade program as of January 1, 2017 (CH&SC 40920.6(c)(2))

Best Available Retrofit Control Technology (BARCT)

- BARCT: an air emission limit that applies to existing sources and is the maximum degree of reduction achievable, taking into account environmental, energy and economic impacts by each class or category of source (*CH&SC, Section 40406*)
- Some nonattainment areas with market-based criteria pollutant reduction programs were not requiring BARCT in all cases
 - For instance, RECLAIM in South Coast allowed sources with excess reductions to sell those reductions to other facilities in lieu of BARCT
- Existing stationary sources in San Joaquin Valley subject to BARCT since the 1980s
 - District will analyze whether increasingly stringent regulations adopted have continued to meet BARCT requirements

Clean Air Efforts in the San Joaquin Valley

- Since 1992, over 600 rules and rule amendments adopted to control emissions from stationary sources
- District leads the nation with the most stringent NOx emission limits (engines, boilers, turbines, glass-melting furnaces, etc.)
 - PM2.5 Plan has determined these rules to meet Most Stringent Measures requirements, more stringent than BARCT
- New or modified sources of emissions must be equipped with the Best Available Control Technology, also more stringent than BARCT

Affected Rules Identified for District's Expedited BARCT Implementation Schedule

- 109 affected facilities within the District were identified as being subject to Cap-and-Trade
- Approximately 4,500 active permit units at those 109 affected facilities
- 31 District rules were identified that:
 - Applied to the 4500 active permit units identified, and
 - Applied to individual source categories subject to state BARCT requirements, and
 - Required additional analysis

Refining List of Affected Rules

- Initial analysis of 31 affected rules reduced list to 15:
 - 5 rules dropped from list because they were superseded by a more stringent rule known to meet BARCT or is on the final list of 15 rules
 - 5 rules dropped from list because rule was determined to meet Most Stringent Measures (MSM) for NO_x (the only relevant pollutant)
 - 6 rules dropped from list because they were determined to obviously meet BARCT (clearly as stringent or more stringent than any other rule)
- 15 affected rules require further analysis for BARCT, and will be prioritized for expedited review as required under AB 617

District's Expedited BARCT Implementation Schedule Prioritization Criteria

- The District's proposed prioritization criteria for BARCT analysis under AB 617:
 1. The greatest period of time since the last rule amendment (required by AB 617)
 2. Any rule applicable to units located within communities selected under the AB 617 process
 3. Any rule with the purpose of controlling NO_x, the primary pollutant in secondary PM_{2.5} and ozone formation
 4. Those rules applicable to the greatest number of permitted units

District's Proposed Expedited BARCT Implementation Schedule

1. Rule 4454, Refinery Process Unit Turnaround
2. Rule 4641, Cutback, Slow Cure, And Emulsified Asphalt, Paving And Maintenance Operations
3. Rule 4104, Reduction Of Animal Matter
4. Rule 4409, Components At Light Crude Oil Production Facilities, Natural Gas Production Facilities, And Natural Gas Processing Facilities
5. Rule 4455, Components At Petroleum Refineries, Gas Liquids Processing Facilities, And Chemical Plants
6. Rule 4623, Storage Of Organic Liquids
7. Rule 4694, Wine Fermentation And Storage Tanks

District's Proposed Expedited BARCT Implementation Schedule (cont'd)

8. Rule 4624, Transfer Of Organic Liquid
9. Rule 4603, Surface Coating Of Metal Parts And Products, Plastic Parts And Products, And Pleasure Crafts
10. Rule 4601, Architectural Coatings
11. Rule 4401, Steam-Enhanced Crude Oil Production Wells
12. Rule 4566, Organic Material Composting Operations
13. Rule 4625, Wastewater Separators
14. Rule 4702, Internal Combustion Engines (VOC Only)
15. Rule 4621, Gasoline Transfer Into Stationary Storage Containers, Delivery Vessels, And Bulk Plants

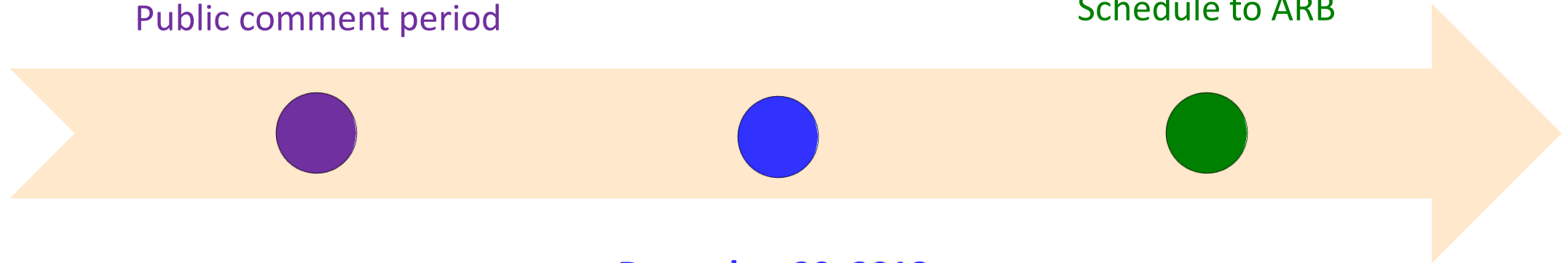
Next Steps...

**2 Weeks:
November 1, 2018 –
November 15, 2018**

Public comment period

By January 1, 2019

Expedited BARCT
Schedule to ARB



December 20, 2018

Adopt Expedite BARCT Schedule
Governing Board Public Hearing

After Adoption of Prioritized Schedule

- District will immediately begin analyzing rules in order of published priority
- Any rules found to not meet state BARCT requirements:
 - District will enter into full rule development process
 - Robust public process and engagement
- Any necessary BARCT rule adoption will take place by the earliest feasible date
 - All such rule adoptions must take place prior to December 31, 2023

Public Comments

Please use podium
for comments and questions.
(Please state your name and affiliation)

Attendees via webcast:
Send Comments via Email: webcast@valleyair.org
Include “AB 617 BARCT” in subject line

For submitting comments on the proposed BARCT
implementation schedule:

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More information available on District's AB 617 website:

<http://community.valleyair.org/>

Or call for more information: (559) 230-6000