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August 10, 2018

VIA ELECTRONIC MAIL

(pfine@aqmd.gov)

Mr. Philip M. Fine, Ph.D.
Deputy Executive Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

SUBJECT: Comment Letter – Proposed Amended Rules 2001 – Applicability and 2002 – Allocations for Oxides of Nitrogen (NO_x) and Oxides of Sulfur (SO_x)

Dear Mr. Fine,

Burbank Water and Power (BWP) is pleased to provide comments on the proposed amendments to Regulation XX – Regional Clean Air Incentives Market (RECLAIM). The proposed amendments are of significant interest and concern to many facilities, including BWP.

The current language for Proposed Amended Rule 2002 (PAR 2002) does not allow facilities that exit the NO_x RECLAIM program access to the South Coast Air Quality Management District (District) internal offset bank until new provisions governing emission calculations and offsets for former RECLAIM facility emission sources are adopted in Regulation XIII. The District included a provision in PAR 2002 that allows facilities to remain in the RECLAIM program, and therefore, continue to follow RECLAIM New Source Review (NSR) provisions until a permanent solution is adopted in Regulation XIII. Facilities that remain in RECLAIM under this provision will also be subject to non-RECLAIM source-specific or industry specific rules.

While BWP is appreciative of the District's efforts to expeditiously move forward with the transition from RECLAIM to Command and Control, BWP feels that being subject to both RECLAIM and non-RECLAIM rules is an unnecessary and confusing burden. BWP strongly feels that the NSR issues should be analyzed and addressed prior to moving forward with any of the rule amendments. This will ensure that facilities are subject to one set of rules and will have a clear understanding of the path moving forward to allow for prudent planning.

BWP looks forward to your response. Please feel free to contact Claudia Reyes, Senior Environmental Engineer, at (818) 238-3510 if you have any questions, or would like to discuss further.

Sincerely,



Frank Messineo
Power Production Manager – BWP Power Supply Division

cc: Claudia Reyes (via electronic mail)
Sean Kigerl (via electronic mail)
Dr. Krishna Nand (via electronic mail)