



NO_x RECLAIM WORKING GROUP MEETING

FEBRUARY 18, 2021

JOIN ZOOM MEETING

[HTTPS://SCAQMD.ZOOM.US/J/97332779341](https://scaqmd.zoom.us/j/97332779341)

MEETING ID: 973 3277 9341

PASSCODE: 945220

TELECONFERENCE DIAL-IN: 1-669-900-6833

Agenda

- Rulemaking Status on Landing Rules
- Summary of Comment Letters on the RECLAIM Transition Plan
- Ongoing Efforts and Next Steps



RULEMAKING STATUS ON LANDING RULES



Rules Under Development



PAR 218 and
PR 218.2/218.3 – Continuous
Emissions Monitoring Systems

Public Hearing: March 5, 2021



PR 1147.1 – Aggregate
Facilities

Public Hearing: June 4, 2021



PR 1109.1 – Refinery
Equipment

Public Hearing: June 4, 2021



PAR 1147 – Miscellaneous
Combustion Sources

Public Hearing: October 1, 2021



PR 1147.2 – Metal Melting
and Heating Furnaces

Public Hearing: August 6, 2021



PR 1159.1 – Nitric Acid
Processing Tanks

Public Hearing: November 5, 2021



PAR 1153.1 – Commercial
Food Ovens

Public Hearing: December 3, 2021

PAR 218 and PR 218.2 & 218.3 – Requirements for Continuous Emissions Monitoring Systems

- Consolidated CEMS requirements for non-RECLAIM and former RECLAIM facilities
- Tiered transition period for implementation
- Proposed amended rules and Draft Staff Report available on February 3, 2021
- Public Workshop conducted on January 6, 2021
- Public Hearing: March 5, 2021

* No amendments needed for Rule 218.1



PAR 1147 – Miscellaneous Combustion Sources

- Working Group Meeting held November 12, 2020
- 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: March 2021
- Public Hearing: October 1, 2021



PR 1147.1 – Aggregate Facilities

- Working Group Meeting held on January 20, 2021
- Aggregate facilities will remain in PR 1147.1 instead of incorporating into PAR 1147
- Next Working Group Meeting: February 24, 2021
- Public Hearing: June 4, 2021



PR 1147.2 – Metal Melting and Heating Furnaces

- Working Group Meeting held on February 2, 2021
- Presented cost-effectiveness for all categories and implementation approach
- Next Working Group Meeting: March 2021
- Public Hearing: August 6, 2021



PR 1109.1 – Refinery Equipment

- Revisiting BARCT limit for heaters and boilers >40 MMBtu/hr
- Continuing to work on issues raised by stakeholders
- Ongoing meetings with stakeholders
- Start-up and shutdown provisions will be addressed in separate rule (PR 429.1)
- Working Group Meetings held on February 4, 2021 and February 11, 2021
- Stationary Source Committee: September 18, 2020 and February 19, 2021
- Next Working Group Meeting: March 2021
- Public Hearing: June 4, 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>

PAR 1153.1 – Commercial Food Ovens

- Staff identified six RECLAIM facilities which operate food ovens, smokers, or dryers that will be subject Rule 1153.1
- BARCT analysis is needed
- Food ovens at RECLAIM facilities will become subject to the requirements of Rule 1153.1
- Public Hearing: December 3, 2021



Emission Reductions (Tons per Day*)



Rules 1146, 1146.1, 1146.2 – Boilers, heaters, and steam generators

0.27



Rule 1135 – Electric Generating Facilities

1.7



Rule 1118.1 – Non Refinery Flares

0



Rule 1110.2 – Gaseous- and Liquid-Fueled Engines

0.29



Rule 1134 – Gas Turbines

1.8



Rule 1117 – Container Glass Melting/Sodium Silicate Furnaces

0.57

Total NOx Reductions = 4.63 tons per day*

*Sum of NOx reductions from RECLAIM facilities only



COMMENT LETTERS ON THE RECLAIM TRANSITION PLAN



Comment Letters

- Five comment letters were received from:
 - California Council for Environmental and Economic Balance (CCEEB)
 - Latham & Watkins on behalf of the Regulatory Flexibility Group (RFG)
 - Los Angeles Department of Water & Power (LADWP)
 - Torrance Refining Company LLC (TORC)
 - Western States Petroleum Association (WSPA)
- Comment letters are available on the proposed rules webpage¹
- Staff will respond to comments on the RECLAIM Transition Plan at the March Working Group Meeting

The collage displays five comment letters, each with a header containing the sender's name and logo, a date of January 19, 2021, and a recipient address at the South Coast Air Quality Management District. The letters are from the California Council for Environmental and Economic Balance (CCEEB), Latham & Watkins LLP, Los Angeles Department of Water & Power (LADWP), Torrance Refining Company LLC (TORC), and Western States Petroleum Association (WSPA). The content of the letters discusses various aspects of the RECLAIM program, including regulatory flexibility, air quality impacts, and the transition to NOx RECLAIM facilities.

¹ <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules>

RECLAIM Topics in Comment Letters

RECLAIM Transition

- Characterization of the effectiveness of NOx RECLAIM
- Disproportionate impacts for RECLAIM facilities having to comply with landing rules while in RECLAIM
- Quantification of emission reductions from landing rules and shave projects
- General agreement with programmatic demonstration for 12 tpd and implementation of CMB-05
- AB 617 requirements related to RECLAIM transition and BARCT requirements

RECLAIM Topics in Comment Letters (continued)

Landing Rules

- Specific landing rule concerns (PAR 218 and PR 218.2/218.3, PR 1109.1)
- Start-up, shutdown, and malfunction
- BARCT assessment
 - \$50,000/ton threshold
 - Retrofit versus replacement
 - Case-by-case analysis
- Alternative emission control plans
- Cost-effectiveness assumptions and calculations
- Incremental cost-effectiveness approach

New Source Review Topics in Comment Letters

New Source Review

- Offset quantification and availability
- Applicability Test
- Co-pollutant strategy
- Scope of NSR changes
- Surplus discount

Permitting in Comment Letters

Permitting

- Retain the facility permit structure
- Permitting fees should be as reasonable as possible
- Need stronger assurance that exiting RECLAIM is not an NSR event
- General agreement to address the ammonia slip limit during permitting
- General agreement to retain RECLAIM MRR in Title V permits during the transition (prior to exiting RECLAIM)

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



Respond to comment letters on the RECLAIM Transition Plan at the next working group meeting

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To receive e-mail notifications for Regulation XX or Regulation XIII, sign up at: www.aqmd.gov/sign-up
To view proposed rules and supporting documentation, visit the South Coast AQMD Proposed Rules webpage at:
<http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules>

Rule Contacts – Proposed Amended/Adopted

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