NOx RECLAIM WORKING GROUP MEETING

FEBRUARY 18, 2021 JOIN ZOOM MEETING

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

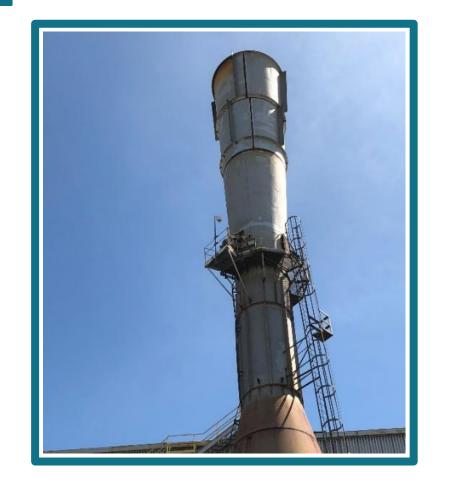


PAR 1153.1 – Commercial Food Ovens

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

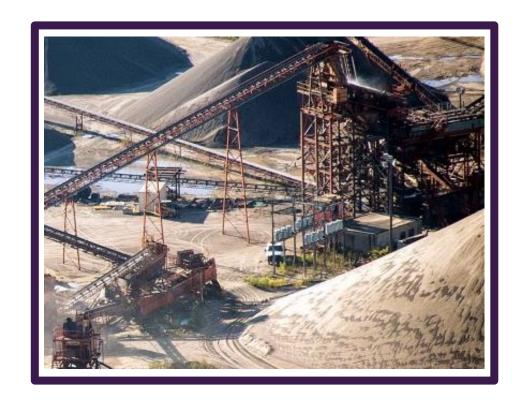
PAR 1147 – Miscellaneous Combustion Sources

- 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*

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



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)



Continue rulemaking activities

Ongoing Efforts and Next Steps



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

Contacts

General Questions

General RECLAIM Questions

Su Assistant Do Su Sanaka

Susan Nakamura
Assistant Deputy Executive Officer
909-396-3105
snakamura@aqmd.gov

Gary Quinn, P.E. Program Supervisor 909-396-3121 gquinn@aqmd.gov

Isabelle Shine
Air Quality Specialist
909-396-3064
ishine@aqmd.gov

Michael Morris
Planning and Rules Manager
909-396-3282
mmorris@aqmd.gov

New Source Review

Uyen-Uyen Vo Program Supervisor 909-396-2238 <u>uvo@aqmd.gov</u>

Lizabeth Gomez
Air Quality Specialist
909-396-3103
Igomez@aqmd.gov

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

Proposed Rule 1109.1	Heather Farr	Program Supervisor	909-396-3672	hfarr@aqmd.gov
	Sarady Ka	Air Quality Specialist	909-396-2331	ska@aqmd.gov
	Mojtaba Moghani, Ph.D.	Air Quality Specialist	909-396-2527	mmoghani@aqmd.gov
	Zoya Banan, Ph.D.	Air Quality Specialist	909-396-2332	zbanan@aqmd.gov
Proposed Amended Rule 1147	Gary Quinn, P.E.	Program Supervisor	909-396-3121	gquinn@aqmd.gov
	Shawn Wang	Air Quality Specialist	909-396-3319	swang@aqmd.gov
Proposed Rule 1147.1	Gary Quinn, P.E.	Program Supervisor	909-396-3121	gquinn@aqmd.gov
	Yanrong Zhu	Air Quality Specialist	909-396-3289	yzhu1@aqmd.gov
	Shawn Wang	Air Quality Specialist	909-396-3319	swang@aqmd.gov
Proposed Rule 1147.2	Rudy Chacon	Air Quality Specialist	909-396-2726	rchacon@aqmd.gov
	James McCreary	Assistant Air Quality Specialist	909-396-2451	jmccreary@aqmd.gov
Proposed Rule 1159.1	Rudy Chacon	Air Quality Specialist	909-396-2726	rchacon@aqmd.gov
	Isabelle Shine	Air Quality Specialist	909-396-3064	ishine@aqmd.gov
Proposed Amended Rule 1153.1	Gary Quinn, P.E.	Program Supervisor	909-396-3121	gquinn@aqmd.gov
	Shawn Wang	Air Quality Specialist	909-396-3319	swang@aqmd.gov
Proposed Amended Rule 218 Proposed Rules 218.2 & 218.3	Gary Quinn, P.E.	Program Supervisor	909-396-3121	gquinn@aqmd.gov
	Yanrong Zhu	Air Quality Specialist	909-396-3289	yzhu1@aqmd.gov

Rule Contacts – Amended/Adopted

Rule 1117	Uyen-Uyen Vo	Program Supervisor	909-396-2238	uvo@aqmd.gov
	Rudy Chacon	Air Quality Specialist	909-396-2726	rchacon@aqmd.gov
Rule 1110.2	Uyen-Uyen Vo	Program Supervisor	909-396-2238	uvo@aqmd.gov
	Rudy Chacon	Air Quality Specialist	909-396-2729	rchacon@aqmd.gov
Rules 1134 & 1135	Michael Morris	Planning and Rules Manager	909-396-3282	mmorris@aqmd.gov
	Uyen-Uyen Vo	Program Supervisor	909-396-2238	uvo@aqmd.gov
Rules 1146, 1146.1, & 1146.2	Gary Quinn, P.E.	Program Supervisor	909-396-3121	gquinn@aqmd.gov
	Kalam Cheung, Ph.D.	Program Supervisor	909-396-3281	kcheung@aqmd.gov
	Lizabeth Gomez	Air Quality Specialist	909-396-3103	lgomez@aqmd.gov
	Shawn Wang	Air Quality Specialist	909-396-3319	swang@aqmd.gov
Rule 1118.1	Heather Farr	Program Supervisor	909-396-3672	hfarr@aqmd.gov
	Steve Tsumura	Air Quality Specialist	909-396-2549	stsumura@aqmd.gov