



# NO<sub>x</sub> RECLAIM WORKING GROUP MEETING

SEPTEMBER 12, 2019  
SOUTH COAST AQMD  
DIAMOND BAR, CA  
CALL-IN # 1-866-705-2554  
PASSCODE: 5796457

# Agenda

- Process moving forward for RECLAIM and New Source Review Working Group Meetings
- Rulemaking Status of Landing Rules
- Update on Equivalency Demonstration (CAA 110(I))
- Update on Discussions with U.S. EPA on New Source Review

# RECLAIM and New Source Review Working Groups

- Two Working Group Meetings: RECLAIM and Regulation XIII
- Plan to schedule both Working Group Meetings on the same day – back to back

## RECLAIM Working Group Meetings

Issues specific to  
NOx RECLAIM transition

Updates on Landing Rules

Regulation XX Rule Amendments

## Regulation XIII Working Group Meetings

New Source Review issues post-RECLAIM  
(Former RECLAIM and Non-RECLAIM)

Address future supply and demand of offsets

Regulation XIII Rule Amendments



# RULEMAKING STATUS



# Rulemaking Status

## PAR 1110.2



### Gaseous- and Liquid-Fueled Engines

- Maintaining existing NOx concentration limits
- Adding ammonia slip 5 ppm
- Public Hearing: November 2019

## PR 1109.1



### Refinery Equipment

- Board approved contracts for two third party consults for review of BARCT assessment
- Meetings with technology vendors, conducting site visits, and working with consultants
- Public Hearing: 2<sup>nd</sup> Quarter 2020

## PAR 218 & 218.1



### Monitoring, Reporting, and Recordkeeping – Continuous Emissions Monitoring Systems

- Applicable to non-RECLAIM and RECLAIM facilities
- Specifying CEMS requirements and performance standards
- Public Hearing: 1<sup>st</sup> Quarter 2020

## PAR 1117



### Glass Melting Furnaces

- Affects 2 facilities
- Both using new pollution control systems
- Public Hearing: 1<sup>st</sup> Quarter 2020

# Rulemaking Status *(Continued)*

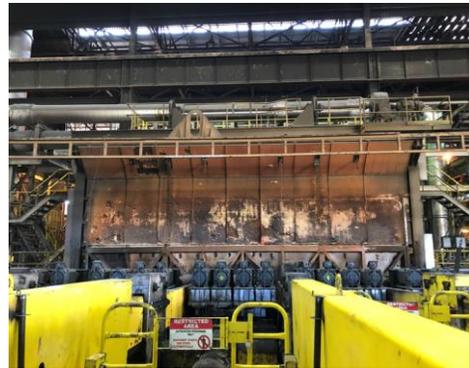
## PAR 1147



### Miscellaneous Combustion Sources

- Conducting BARCT analysis
- Presenting permitting and source test data
- Meeting with burner manufacturers
- Public Hearing: 1<sup>st</sup> Quarter 2020

## PR 1147.1



### Large Miscellaneous Combustion Sources

- Conducting BARCT analysis
- Presenting permitting and source test data
- Meeting with burner manufacturers
- Public Hearing: 1<sup>st</sup> Quarter 2020

## PR 1147.2



### Metal Processing Equipment

- Conducting BARCT analysis
- Presenting permitting and source test data
- Meeting with burner manufacturers
- Public Hearing: 1<sup>st</sup> Quarter 2020

## PR 1147.3



### Aggregate Facilities

- Staff in data gathering phase
- Public Hearing: 3<sup>rd</sup> Quarter 2020



# UPDATE ON NEW SOURCE REVIEW



# U.S. EPA Meeting

- South Coast AQMD staff met with U.S. EPA Region IX staff on August 15, 2019
- Discussed several issues pertaining to the RECLAIM transition and New Source Review (NSR):
  - Rulemaking status
  - RECLAIM transition - Federal CAA 110(I)
  - Confirmation of NSR applicability and offsetting recommendations for new and modified sources (Reg XIII presentation)
  - Initial concepts for reducing the demand for offsets

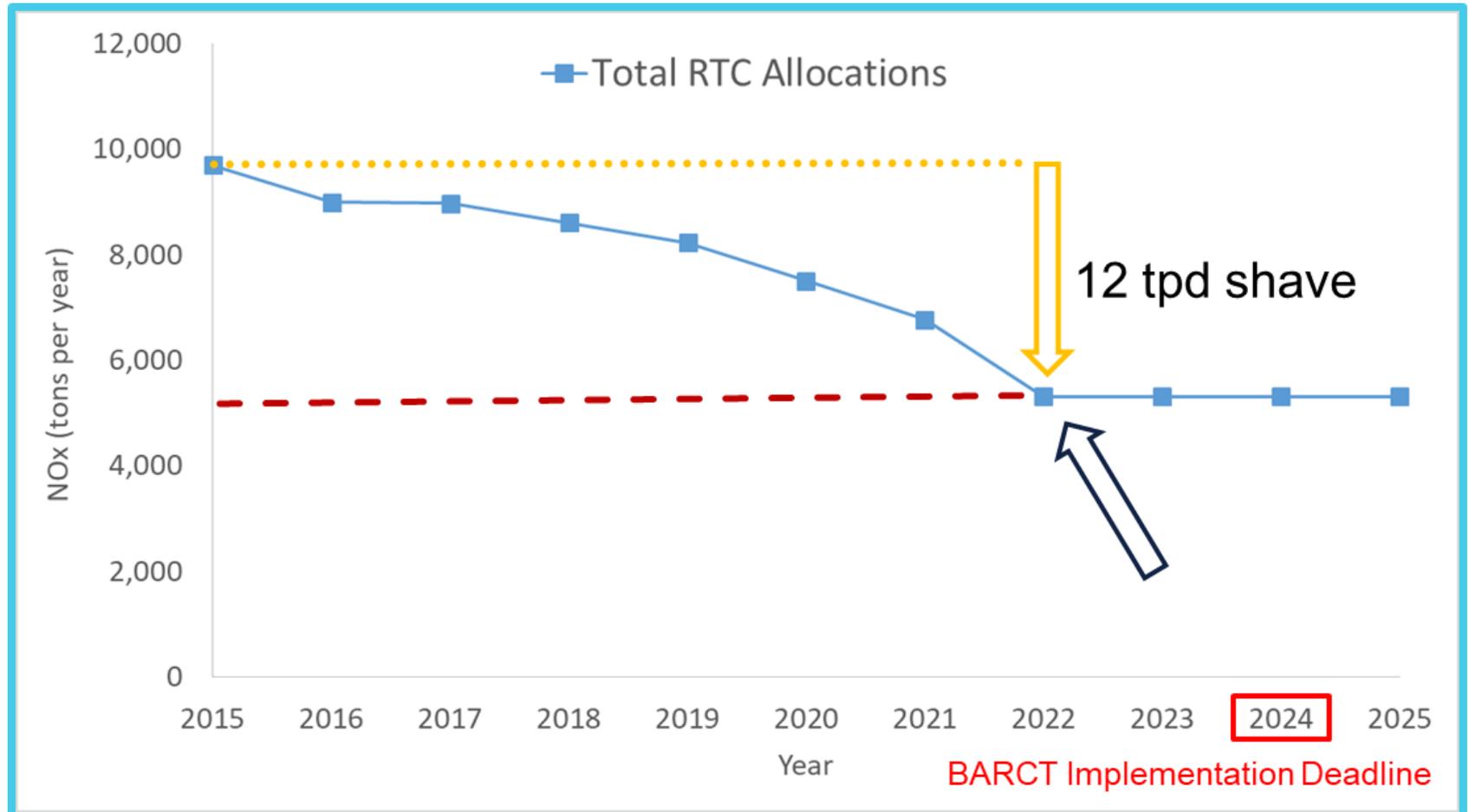


# Federal CAA 110(I) Equivalency Demonstration

- On December 4, 2015, Board adopted NOx RECLAIM amendments
  - Amendments resulted in a phased reduction of NOx allocations beginning in 2016 and continuing through 2022
  - Overall NOx reductions will be 12 tons per day (tpd) when fully implemented in 2022 and beyond
- Federal CAA 110(I) requires an equivalency demonstration of this SIP commitment for RECLAIM to achieve the 12 tpd NOx shave

# SIP Commitment

- In 2022, total RTC allocations for RECLAIM will be 14.5 tons per day (tpd) after the 12 tpd shave



# Approach for Federal CAA 110(I) Equivalency Demonstration

- Based on discussions with U.S. EPA, staff is recommending a one-time, programmatic equivalency demonstration as part of the SIP submittal package for the RECLAIM transition
- Actual emissions from RECLAIM facilities would be compared to the 14.5 tpd at time of SIP submittal of all rules
  - Regulation XX – RECLAIM
  - Landing Rules
  - Regulation XIII – New Source Review
- If actual emissions > 14.5 tpd:
  - Projection of actual emissions will be made to reflect implementation of landing rules with future effective dates
  - Projection will indicate when emissions will be below 14.5 tpd

# SB 288 Demonstration

- SB 288 prohibits agencies from changing their NSR requirements to be less stringent than those that existed in 2002
- RECLAIM NSR requires facilities that entered after the start of the program<sup>1</sup> to hold RTCs equal to their PTE at the beginning of each compliance year
- 14.5 tpd RTC allocation is sufficient to cover the holding requirements for these facilities
- Staff is proposing a similar approach as the federal equivalency demonstration
  - One-time demonstration that actual emissions will be below the 14.5 tpd RTC allocation with the implementation of command-and-control rules
  - Staff is still working with CARB on this approach

<sup>1</sup> Also applies to facilities with emission increases above their starting allocation

# Additional 5 tpd of NOx by 2025 (CMB-05)

- 2016 AQMP Control Measure CMB-05 proposed further NOx reduction of 5 tpd by 2025 from RECLAIM facilities
- Historically, implementation of control measures has not had a mass emission demonstration requirement
- U.S. EPA and South Coast AQMD agree that a mass emission demonstration is not necessary for the additional 5 tpd NOx reductions
- Reductions will be achieved through implementation of command-and-control rules with an emission standard or concentration limit, not mass emissions

# Summary

- Separate meetings for RECLAIM and Regulation XIII – NSR
- One-time demonstration for Federal CAA 110(I) and SB 288 compliance as part of the SIP submittal for RECLAIM transition
  - Staff will continue discussions with CARB for SB 288 compliance
- 2016 AQMP Control Measure CMB-05 reductions will be achieved through command and control rules
  - Mass emission demonstration is not necessary for this control measure

# Contacts

## General RECLAIM Questions

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- Kevin Orellana  
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## New Source Review

- |   |   |
|---|---|
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| <ul style="list-style-type: none"><li>• Kevin Orellana<br/>Program Supervisor<br/>909-396-3492<br/>korellana@aqmd.gov</li></ul>       | <ul style="list-style-type: none"><li>• Melissa Gamoning<br/>Assistant Air Quality Specialist<br/>909-396-3115<br/>mgamoning@aqmd.gov</li></ul> |

# Rule Contacts – Proposed Amended/Adopted

|                                    |                   |                                  |              |                      |
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# Rule Contacts – Amended/Adopted

|                              |                     |                            |              |                   |
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