Proposed Amendments to Rule 2201

(New and Modified Stationary Source Review Rule)

July 26, 2016

(Webcast participants: submit comments to webcast@valleyair.org)
Recent Amendments

• Adopted amendments to Rule 2201 on February 18, 2016

• Addressed requirements associated with reclassification to serious nonattainment for 1997 and 2006 PM2.5 NAAQS
  – Lowered the PM2.5 Major Source and Federal Major Modification trigger thresholds
  – Addressed PM2.5 precursors
  – Clarified PM2.5 definition pertaining to condensable particulates

• Took opportunity to make other changes
  – Included certain TREUs in section 8 – Application Shield
  – Removed CO nonattainment areas offset threshold
Recent Amendments (cont’d)

• Also included revisions based on EPA comments
  – Renamed “Routine Replacement” with “Replacement Emissions Unit” and removed the term “routine” from the definition
Reason for New Amendments

• ARB has determined that the February 18, 2016 version of Rule 2201 is not approvable

• ARB objects to the District’s implementation of EPA’s “routine replacement” comment
  – ARB says removing the term “routine” potentially expands BACT exemptions and is not allowed under SB 288 (Protect California Air Act of 2003)

• Only other changes are minor clarifications based on additional EPA comments
Routine Replacement Emissions Unit

- During Feb 2016 amendment process, EPA asked that term “Routine Replacement” be changed because the term had a different meaning under federal law
  - Amended term to “Replacement Emissions Unit” and removed “routine” in the definition

- Proposed amendment will reinstate “routine” to the definition (section 3.35) and will rename term to “Routine Replacement Emissions Unit” throughout the rule
TREU Clarification

• EPA requested clarification that the application shield for TREUs that was added to section 8.0 only applied to existing units with valid District Permit to Operate (PTO)
  – District added to section 3.41
• Consistent with current definition for Routine Replacement Emissions Unit (section 3.35)
• No change to District’s longstanding interpretation or implementation of provisions
Federal Major Modification Clarification

• EPA requested that the District consider additional language to specifically repeat the federal prohibition on netting out of federal major modification for VOC and NOx in extreme ozone nonattainment areas
  – District added to section 3.18.1

• No change to District’s longstanding interpretation or implementation of provisions
EPA and ARB Review

- The District provided EPA and ARB an opportunity to review the proposed rule amendments
- EPA and ARB have indicated, based on their preliminary review, that they expect to have no comments on the proposed changes
Next Steps...

7/26 – 8/9:
Public comment period

8/16 – 9/15:
Public comment period

8/16:
Publication of proposed rule package to District web page

9/15/2016:
Governing Board Public Hearing
Comment Deadline

August 9 at 5:00 PM

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Questions/Comments

Please come to podium
State name and affiliation

Webcast participants can send questions/comments by email while the webcast is operational:
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