



# REQUEST FOR COMMENTS

May 24, 2018

TO: INTERESTED PARTIES  
FROM: EXECUTIVE OFFICER / APCO  
SUBJECT: **AB617 Expedited BARCT Implementation Schedule:  
Concept Paper / Nine Rule Development Project  
Scopes**

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The staff of the Bay Area Air Quality Management District (“Air District”) is seeking comments regarding a draft concept paper: AB 617 Expedited BARCT Implementation Schedule. The concept paper summarizes the Air District’s approach to address Assembly Bill 617 requirements regarding Best Available Retrofit Control Technology (BARCT) implementation. In addition to the concept paper, the Air District has prepared a series of draft project scope papers, covering each of the nine proposed BARCT rule development projects. For next steps, Air District staff will respond to comments and input received and arrange meetings with interested parties to further discuss this information.

## **BACKGROUND:**

The Community Air Protection Program was established by the state to implement Assembly Bill 617 (C. Garcia, Chapter 136, Statutes of 2017). AB 617 directs the state, in consultation with local air districts, to select communities that have a “high cumulative exposure burden” to air pollution. Once selected, these communities will work with local air districts on community emission reduction programs and/or community monitoring campaigns. The bill also requires expedited best available retrofit control technology implementation and directed California Air Resources Board (CARB) to consult with local air districts to establish statewide uniform emissions reporting requirements.

## **Expedited BARCT Implementation**

AB 617 requires air districts to review the emissions control technology installed on pollution sources located at facilities subject to the Cap-and-Trade program. The Air District has identified 80 of these facilities, that include over 3,000 sources. To address facilities that do not have Best Available Retrofit Control Technologies (BARCT) in place, each air district must adopt an Expedited BARCT Implementation Schedule before the end of 2018. The Air District has identified source categories where BARCT is not in place and has created a list of nine rule development projects to consider for implementation. The initial list of projects address emissions of particulate matter (PM), oxides of nitrogen (NOx), reactive organic gases (ROG), and sulfur dioxide (SO<sub>2</sub>), and include industrial operations such as organic liquid storage tanks, petroleum wastewater treatment operations, Portland cement manufacturing, landfills, and refinery fluid catalytic crackers.

Since BARCT implementation will likely result in the installation of equipment, BAAQMD will conduct a CEQA environmental impact analysis to assess the potential cumulative environmental impacts of adopting the draft suite of projects contained in the schedule. Staff will present the Expedited BARCT Implementation Schedule and CEQA environmental analysis to the Air District Board of Directors later this fall.

For copies of the draft concept paper, and individual rule development project scope papers, see the District's website at <http://www.baaqmd.gov/ruledev>. For questions or comments on the draft documents, please contact Guy Gimlen, Principal Air Quality Engineer, at (415) 749-4734 or via e-mail at [ggimlen@baaqmd.gov](mailto:ggimlen@baaqmd.gov). **Written comments, submitted by U.S. mail or electronic mail, are requested by Friday, June 15, 2018.**