

Minor Edits to Proposed Rules

The Air District Staff have made some minor changes to three of the proposed Refinery Emission Reduction Strategy rules. These changes are intended to clarify the intent of the rules and are not substantive. The purpose of this document is to explain the changes and why they were made.

Regulation 6, Rule 5:

1. Editorial: Renaming two definitions and renumbering to maintain alphabetical order in Table of Contents.
2. Editorial: Corrected title of Section 112 in Table of Contents.
3. Clarification: In response to e-mailed comment from Shell refinery, Staff made explicit the provision that non-FCCU sources with emissions that are subject to Section 301 AND that have startup or shutdown provisions in a District permit are eligible for the limited exemption in Section 112 under the terms of their own permit conditions, rather than under the terms of the FCCU startup and shutdown provisions that are defined in this rule. Therefore, the limited exemption in Section 301 applies to all sources subject to this section whenever ANY source is in a startup or shutdown condition. This treatment is necessary because non-FCCU sources subject to Section 301 have a commingled emission stream with an FCCU and there is no way to differentiate emissions by source. This clarification is in Section 112.

Regulation 9, Rule 14:

1. Editorial: Spelled out “percent” rather than using the “%” sign throughout the document.
2. Editorial: Section 9-14-301 was originally a long paragraph. It’s been broken up into subsections so that it is easier to follow.
3. Editorial: Section 301.2 changed the “total” SO₂ calendar year limit of 770 tons to an SO₂ limit of 385 tons “per kiln” to be consistent with the language in Subsection 301.1
4. Clarification: Updated language in Subsections 301.1 and 301.2 regarding consecutive 24-hour averaging requirements for SO₂ emission rates for clarity and consistency.
5. Editorial: The language in the new Section 9-14-403 was moved from the 300 Section to this section, which is the appropriate section for an administrative requirement.

Regulation 11, Rule 10:

1. Clarification: A short phrase was added to Section 11-10-305 to make it clear that the chemical speciation requirement is a daily requirement upon the discovery of a leak.