



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

WORKSHOP NOTICE

November 14, 2012

TO: INTERESTED PARTIES
FROM: EXECUTIVE OFFICER / APCO
SUBJECT: **PUBLIC WORKSHOP - DRAFT AMENDMENTS TO REGULATION 9, RULE 10: NO_x AND CO FROM BOILERS, STEAM GENERATORS & PROCESS HEATERS IN PETROLEUM REFINERIES**

The staff of the Bay Area Air Quality Management District ("Air District") will conduct a public workshop to present and seek input on possible amendments to Regulation 9, Rule 10 from **6:00 PM to 8:00 PM on Tuesday, December 4, 2012** at the **VFW Post 1351 Veterans Memorial Hall at 930 Ward Street in downtown Martinez, California.**

BACKGROUND:

The Air District is considering amendments to Regulation 9, Rule 10 that would set a voluntary, alternative NO_x emission limit that a refinery could elect to use instead of the current emission limit that applies to most refinery heaters that were in service in 1994 ("pre-1994 heaters"). The current limit is a daily-average emission rate limit expressed as 0.033 pounds of NO_x per million BTUs of collective heat input (0.033 lb/MM BTU) at pre-1994 heaters. This current limit caps daily NO_x emissions in relation to the amount of daily fuel use at pre-1994 heaters, but does not limit NO_x mass emissions absolutely, so the amount of NO_x that may be emitted changes each day in relation to the total amount of fuel used at pre-1994 heaters.

The proposed voluntary alternative NO_x emission limit for pre-1994 heaters is a fixed, daily limit on NO_x mass emissions at pre-1994 heaters that is based on the average, actual emissions at these heaters during a recent baseline period. This limit would be different for each refinery, but would limit NO_x emissions from pre-1994 heaters to an actual average emission level. The alternative mass emission limit would be reduced whenever a heater was no longer subject to Regulation 9-10 in order to ensure that the average level of NO_x control at the remaining heaters was not relaxed.

The proposed amendment includes provisions to ensure that any refinery that elects to use the voluntary alternative NO_x limit would not avoid any quantifiable emission

reductions that would have been required under the current provisions of Regulation 9-10. The use of continuous emissions monitoring systems (CEMS) would be required for all heaters covered by the alternative limit.

The second proposed change is to amend the monitoring provisions for the current pre-1994 heater NOx limit under curtailed or low-fire operating conditions. When a heater is not equipped with a CEMS for NOx monitoring, monitoring provisions are partially specified in Regulation 9-10 and partially in permit conditions. The amendment would improve the consistency of monitoring implementation, while ensuring that non-CEMS-equipped heaters always use conservative estimates of emissions when monitoring overall compliance. District staff will discuss two different monitoring options that address this issue, with the intention of selecting one these for inclusion in the final rule proposal.

COMMENTS AND FURTHER INFORMATION:

The draft amendments and the workshop report are available on the Air District website: <http://www.baaqmd.gov/Divisions/Planning-and-Research/Rule-Development/Rule-Workshops.aspx>. For additional information or to submit comments, please contact Julian Elliot, Senior Air Quality Engineer, at (415) 749-4705 or via e-mail at jelliot@baaqmd.gov. **Written comments, submitted by U.S. mail or electronic mail, are requested by the end of Friday, December 21, 2012.**