

## Victor Douglas

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**From:** Rupa Renganathan <rupa.renganathan@sevaehs.com>  
**Sent:** Tuesday, November 8, 2016 12:13 PM  
**To:** Victor Douglas  
**Subject:** Potential Impact to Stationary Sources of Toxic Emissions  
**Attachments:** BAAQMD\_Rg 11 Rule 18 Notice.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good afternoon Mr. Douglas,

We recently received the attached circular concerning a proposed new rule affecting toxic emission sources. I will not be able to attend any of the public workshop sessions so hoping you may be able to assist with confirming or correcting my understanding of the draft rule as summarized below:

1. The rule intends to target potentially significant emitters of toxic air emissions such as generators at data centers. I would extrapolate this to mean that a facility say, with only natural gas fired boilers < 2 mmBtu/hr will likely not be affected.
2. This rule is applicable only to "existing" sources which per the "draft staff report" in the BAAQMD Rule Development webpage means sources constructed before 1987
3. BAAQMD will be conducting the necessary analysis to determine whether a particular facility is affected by the rule and notifying the facility if any compliance action is required i.e. no preemptive assessment or determination is required by the facility itself

I look forward to your feedback and thank you for your time.

Best,  
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