



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

Request for Comments

May 28, 2020

TO: INTERESTED PARTIES
FROM: EXECUTIVE OFFICER / APCO
SUBJECT: **Request for Comments – Draft Amendments to Regulation 6, Particulate Matter, Rule 5: Particulate Emissions from Refinery Fluidized Catalytic Cracking Units**

NOTICE: The Air District is taking steps to ensure Bay Area air quality and public health are protected while the shelter in place order in San Francisco and other Bay Area counties is in place. This includes closing our 375 Beale Street office in San Francisco until further notice. For more information, please visit our website: <https://www.baaqmd.gov/news-and-events/page-resources/2020-news/air-district-operations>.

The staff of the Bay Area Air Quality Management District (Air District) is requesting comments on draft amendments to Regulation 6, Rule 5: Particulate Emissions from Refinery Fluidized Catalytic Cracking Units (Rule 6-5).

BACKGROUND

The Bay Area Air Quality Management District is developing amendments to Regulation 6: Particulate Matter, Rule 5: Particulate Emissions from Petroleum Refinery Fluidized Catalytic Cracking Units. The purpose of these amendments is to address emissions of particulate matter from petroleum refinery fluidized catalytic cracking units, which are some of the largest individual sources of particulate matter emissions in the San Francisco Bay Area. The Bay Area does not currently attain all state and national ambient air quality standards for particulate matter, and compelling evidence suggests that fine particulate matter is the most significant air pollution health hazard in the Bay Area. Further reductions of particulate matter emissions are needed to ensure progress towards attainment of the standards and to achieve further clean air and public health benefits.

Air District Rule 6-5 was originally adopted in 2015 as the first regulatory step in addressing condensable particulate matter from these petroleum refinery fluidized catalytic cracking units. The Air District's 2017 Clean Air Plan included a control measure to evaluate ongoing progress in reducing these emissions, and to further control particulate matter emissions from fluidized catalytic cracking units. In 2018, the Air District adopted the Expedited Best Available Retrofit Control Technology (BARCT) Implementation Schedule, which identified potential rule development projects to evaluate and implement BARCT at certain industrial sector facilities pursuant to California Assembly Bill 617 (AB 617). The schedule identified that potentially substantial particulate matter emission reductions could be achieved at these fluidized catalytic cracking units, and further rule amendments should be evaluated and considered. This current rule development effort for amendments to Rule 6-5 follows these previous Air District

rulemaking and planning actions to address emissions from these sources. These amendments are needed to ensure that Air District regulations are as health-protective as possible and consider recent advances in the understanding and control of condensable particulate matter emissions.

DRAFT PROPOSAL

The purpose of the draft amendments to Rule 6-5 is to further address particulate matter emissions, including condensable particulate matter emissions, from petroleum refinery fluidized catalytic cracking units. The draft amendments include new and modified limits on ammonia and sulfur dioxide, as well as a direct limit on total particulate matter 10 microns or less in diameter, which includes both filterable and condensable particulate matter. The draft new and modified limits reflect levels of stringency that have been achieved and demonstrated at multiple facilities, and ensure that total particulate matter emissions are adequately controlled. The draft amendments also include modifications to existing rule language to clarify provisions and improve monitoring requirements.

The Air District is publishing the full mark-up text of draft amendments for Rule 6-5 and an Initial Staff Report. The Air District intends to analyze and review potential socioeconomic impacts and include further information in the final proposal package. Potential environmental impacts related to projects under the AB 617 Expedited Best Available Retrofit Control Technology Implementation Schedule, including amendments to Rule 6-5, were previously analyzed in an Environmental Impact Report (EIR) certified by the Air District Board of Directors in December 2018. The Air District intends to assess the impacts addressed in the certified Environmental Impact Report, and determine if additional analysis of impacts from amendments to Rule 6-5 is required pursuant to the California Environmental Quality Act (CEQA).

INFORMATION AND COMMENTS

A Request for Comments is the next step in the Air District's public engagement process. Staff requests comments and questions about the draft amendments to Rule 6-5 and Initial Staff Report. Following this Request for Comments and close of the public comment period, staff will assess the need for changes to the rule amendments. Staff may consider soliciting further input or may proceed to a public hearing before the Air District's Board of Directors.

For copies of the draft amendments to Rule 6-5 and Initial Staff Report, please visit our website at <https://www.baaqmd.gov/reg6rule5> or submit a request to David Joe at (415) 749-8623 or djoe@baaqmd.gov. For questions or comments on the draft regulatory amendments, please contact David Joe. Interested parties are invited to submit comments on the draft rule amendments and Initial Staff Report. The deadline to submit comments on these materials is Monday, July 13, 2020 at 5:00 p.m.