



Public Hearing Notice

March 18, 2026

TO: INTERESTED PARTIES
FROM: EXECUTIVE OFFICER / APCO
SUBJECT: **Public Hearing Notice – Proposed Amendments to Regulation 11: Hazardous Pollutants, Rule 18: Reduction of Risk from Air Toxic Emissions at Existing Facilities**

The Board of Directors of the Bay Area Air District (Air District) will conduct a public hearing at the Air District Headquarters' 1st floor Board Room, 375 Beale Street, San Francisco, California, on **Wednesday, June 3, 2026, at 10:00 a.m.**, or as soon thereafter as the matter may be heard. The meeting is also accessible via Zoom on the [Air District's website](#).

The Board will consider:

- Adoption of proposed amendments to Regulation 11: Hazardous Pollutants, Rule 18: Reduction of Risk from Air Toxic Emissions at Existing Facilities (Rule 11-18); and
- Adoption of proposed updates to the Rule 11-18 Implementation Procedures.

The Air District is issuing a Public Hearing Notice and is accepting comments on proposed amendments to Rule 11-18, proposed updates to the Rule 11-18 Implementation Procedures, and other supporting materials.

BACKGROUND

Rule 11-18 was adopted by the Air District in 2017 to address facilities whose emissions of toxic air contaminants result in significant risks to nearby residents and workers. The purpose of Rule 11-18 is to focus on existing facilities causing the highest health impacts across the Bay Area and require these facilities to reduce those impacts.

Concerns from community groups and Air District committees have highlighted delays in implementing Rule 11-18, particularly in finalizing Health Risk Assessments (HRAs) and Risk Reduction Plans (RRPs). Additionally, the Richmond-North Richmond-San Pablo Path to Clean Air Community Emission Reduction Plan (PTCA CERP) calls for improvements in Rule 11-18 to improve efficiency and transparency. In response, the Air District is developing amendments to expedite risk reduction and improve program implementation.

PROPOSED AMENDMENTS

The proposed amendments aim to streamline program administration to implement the risk reduction components of the rule as soon as feasible. Key changes include:

Health Risk Assessments (HRAs)

- Require facilities to prepare preliminary HRAs using Air District-approved modeling protocols. The protocols would apply standardized methods customized with site-specific information, allowing for greater efficiency by leveraging facility-specific knowledge and resources and enabling more preliminary HRAs to move forward simultaneously;
- Give the Air District authority to review, correct, and approve HRA inputs and results;
- Establish specific deadlines for facilities to respond to Air District comments and corrections;
- Formalize the current practice of holding a public comment period on the preliminary HRA concurrent with the existing 90-day comment period for the facility; and
- Outline what happens when additional testing or emissions data may affect the facility's HRA results and RAL status.

Risk Reduction Plans (RRPs)

- Revise the terminology and timeline associated with the district's review of draft Risk Reduction Plans (RRPs) prior to public comment; and
- Clarify the circumstances under which extensions to the implementation of an RRP or risk reduction measure may be granted.

Staff has also developed proposed updates to the Rule 11-18 Implementation Procedures, which includes aligning with the proposed amended rule language; improving clarity and readability; and defining the role, scope, and process for a Dispute Resolution Panel that is expected to hear disputes between refineries and the Air District about technical issues.

INFORMATION AND COMMENTS

The proposed amendments to Rule 11-18, proposed updates to the Rule 11-18 Implementation Procedures, and other supporting materials are being published for public review and comment. The Staff Report outlines the rationale for the proposed rule amendments, regulatory context, discussions on expected impacts of the amendments, and socioeconomic analysis. Air District staff has prepared a written analysis describing the regulatory context of the amendments pursuant to California Health and Safety Code § 40727.2, as well as an addendum to the Air District's 2017 Environmental Impact Report (EIR) for Rule 11-18 pursuant to the California Environmental Quality Act (CEQA) describing the amendments and discussing why a subsequent or supplemental EIR is not required.

For copies of the proposed package materials, including the written analysis pursuant to California Health and Safety Code § 40727.2 and the CEQA addendum, visit www.baaqmd.gov/ruledev or request them from Greg Nudd, who can be reached by email at ruledevelopment@baaqmd.gov, by phone at (415) 749-4653, or by mail at Rule Development, Bay Area Air Quality Management District, 375 Beale Street, Suite 600, San Francisco, CA 94105. Written comments on the proposed package materials should be addressed to Greg Nudd at Rule Development, Bay Area Air Quality Management

District, 375 Beale Street, Suite 600, San Francisco, CA 94105. Comments may also be sent by e-mail to ruledevelopment@baaqmd.gov. **Comments on the proposed amendments to Rule 11-18 and associated materials are requested by April 19, 2026, at 5:00 PM.** Verbal comments are welcome up to the day of and during the Public Hearing.