



# Workshop Notice and Request for Comments

**August 28, 2025**

TO: INTERESTED PARTIES  
FROM: EXECUTIVE OFFICER / APCO  
SUBJECT: **Workshop Notice and Request for Comments –  
Draft Amendments to Regulation 11: Hazardous  
Pollutants, Rule 18: Reduction of Risk from Air Toxic  
Emissions at Existing Facilities**

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The staff of the Bay Area Air Quality Management District (Air District) is issuing a Workshop Notice and Request for Comments regarding draft amendments to Regulation 11: Hazardous Pollutants, Rule 18: Reduction of Risk from Air Toxic Emissions at Existing Facilities (Rule 11-18).

## **PUBLIC WORKSHOP**

The Air District will host a virtual public workshop to provide the public with an opportunity to learn about, discuss, and comment on the draft amendments to Rule 11-18. The workshop will be conducted virtually via webcast on **October 2, 2025, from 6:00 to 8:00 PM**. A web link to register for the workshop is available on the Air District's website, at [www.baaqmd.gov/ruledev](http://www.baaqmd.gov/ruledev).

Simultaneous interpretation is available upon request at least 3 business days prior to the public meeting date. For language interpretation requests, contact [jabraham@baaqmd.gov](mailto:jabraham@baaqmd.gov) or 415-749-8408.

- Para información en español, llame al 415-749-4609
- 中文聯絡電話 415-749-4609
- Nói Tiếng Việt xin gọi 415-749-4609

## **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.

## **DRAFT AMENDMENTS**

The draft 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 District-approved modeling protocols. The protocols will 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;
- Retain and exercise 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
- Add language outlining what happens when new emissions data affects the facility's HRA results and risk action level (RAL) status.

### *Risk Reduction Plans (RRPs)*

- Revise the terminology and timeline associated with the district's review of draft Risk Reduction Plans (RRPs) from a 20-day "completeness review" to a 60-day "review" 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 have also developed draft amendments to the Rule 11-18 Implementation Procedures, which includes aligning with the draft amended rule language; improving clarity and readability; and defining the role, scope, and process for the Dispute Resolution Panel (DRP).

## **INFORMATION AND COMMENTS**

The Air District has published the draft rule amendments, draft amendments to the Rule 11-18 Implementation Procedures, and a Preliminary Staff Report detailing these draft changes. The Air District invites public feedback on these documents and will consider all input received during the comment period and public workshop toward further development of these amendments. Following the comment period, the Air District will assess the need for revisions before proceeding to a public hearing before the Board of Directors.

### **Deadline for public comments: Monday, October 13, 2025, at 5:00 p.m.**

Submit questions or comments to [ruledevelopment@baaqmd.gov](mailto:ruledevelopment@baaqmd.gov), by mail to 375 Beale St., Suite 600, San Francisco, CA 94105, or during the public workshop.

For copies of the draft amendments to Rule 11-18, Rule 11-18 Implementation Procedures, and Preliminary Staff Report, visit [www.baaqmd.gov/ruledev](http://www.baaqmd.gov/ruledev) or request them from Rule Development at [ruledevelopment@baaqmd.gov](mailto:ruledevelopment@baaqmd.gov) or (415) 749-4653.