



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

AGENDA: 3

Facility Risk Reduction Program: Rule 11-18 Implementation Update

Stationary Source and Climate Impacts
Committee Meeting
June 21, 2021

Carol Allen
Manager, Engineering – Permitting & Toxics Section
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Presentation Outcome



- Understand the requirements and implementation process for the Facility Risk Reduction Program: Regulation 11, Rule 18 (Regulation 11, Rule 18)
- Be informed about recent program activities
- Understand the next steps for this program

Presentation Outline



- Review of Regulation 11, Rule 18
- Progress on Health Risk Assessments (HRA)
- Workshop for AB&I Foundry HRA
- Next Steps

Presentation Requested Action



- None – informational presentation

Rule 11-18 Review



Goal:

- Identify facilities that pose elevated health risks due to stationary source emissions and require those facilities to reduce health risks.

Requirements:

- Reduce facility health risks from all stationary sources below ***Risk Action Levels***, OR
- Install best available controls on each ***Significant Source*** of health risk

Rule 11-18 – Risk Reduction Thresholds



Risk Action Levels (RALs) for Facility Risks

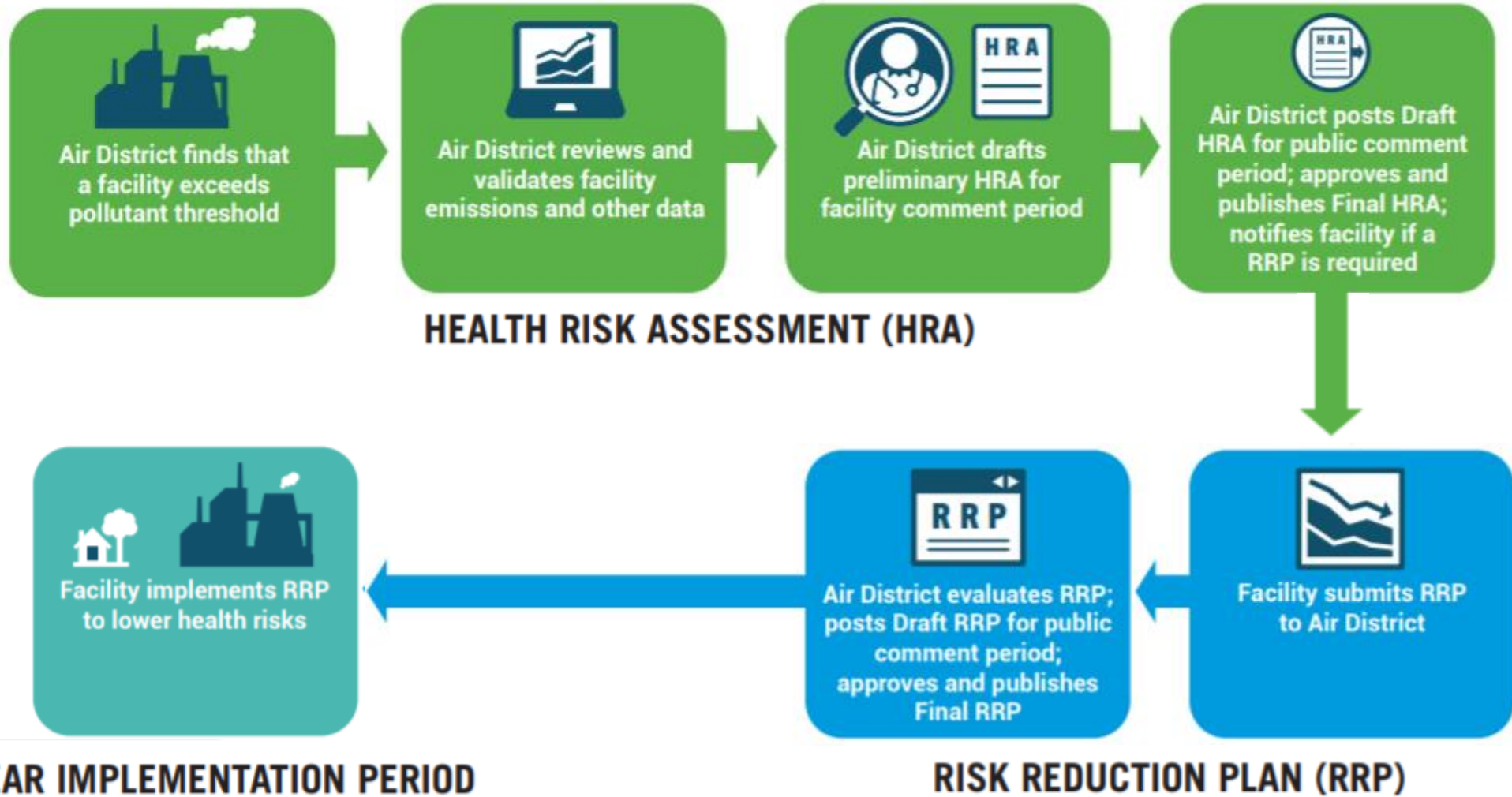
- Facility risks are health risks resulting from all sources at a facility.

Significant Source Thresholds for Source Risks

- Source risks are health risks resulting from an individual source or operation at a facility.

Health Risk Category	Facility Risk Action Levels	Significant Source Levels
Cancer Risk	≥ 10 in a million	≥ 1 in a million
Chronic Hazard Index	≥ 1.0	≥ 0.2
Acute Hazard Index	≥ 1.0	≥ 0.2

Rule 11-18 Implementation Process



Health Risk Assessments



Implementation Phase	Prioritization Score	Number of Facilities	Expected HRA Year
Phase I	> 250	34	2019-2022
Phase II - A	100 – 250	30	2022-2023
Phase II - B	50 – 100	57	2023-2024
Phase II - C	10 - 50	203	2024 +

Health Risk Assessment Progress



Facility Name	City	Data Review	HRA: Prelim	HRA: Draft	HRA: Final	Will Risk Reductions Be Required?
City of Santa Clara	Santa Clara					No
AB&I Foundry	Oakland					Yes
Irvington Memorial Cemetery	Fremont					Yes
Los Medanos Energy Center	Pittsburg					No
Owens Corning Insulating Systems	Santa Clara					Yes
PCC Structurals - San Leandro	San Leandro					Yes
Chemtrade West US LLC	Richmond					
West Contra Costa County Landfill	Richmond					

Health Risk Assessment Progress Cont'd



Facility Name	City	Data Review	HRA: Prelim	HRA: Draft	HRA: Final	Will Risk Reductions Be Required?
Genentech, Inc	South San Francisco					
Lehigh Southwest Cement Co.	Cupertino					
Tri-Cities Recycling	Fremont					
Clover Flat Resource & Recovery	Calistoga					
Ameresco Keller Canyon	Pittsburg					

Workshop for AB&I Foundry HRA



May 7, 2021

Co-hosted with Communities for a Better Environment (CBE)

145 Participants

Major Concerns:

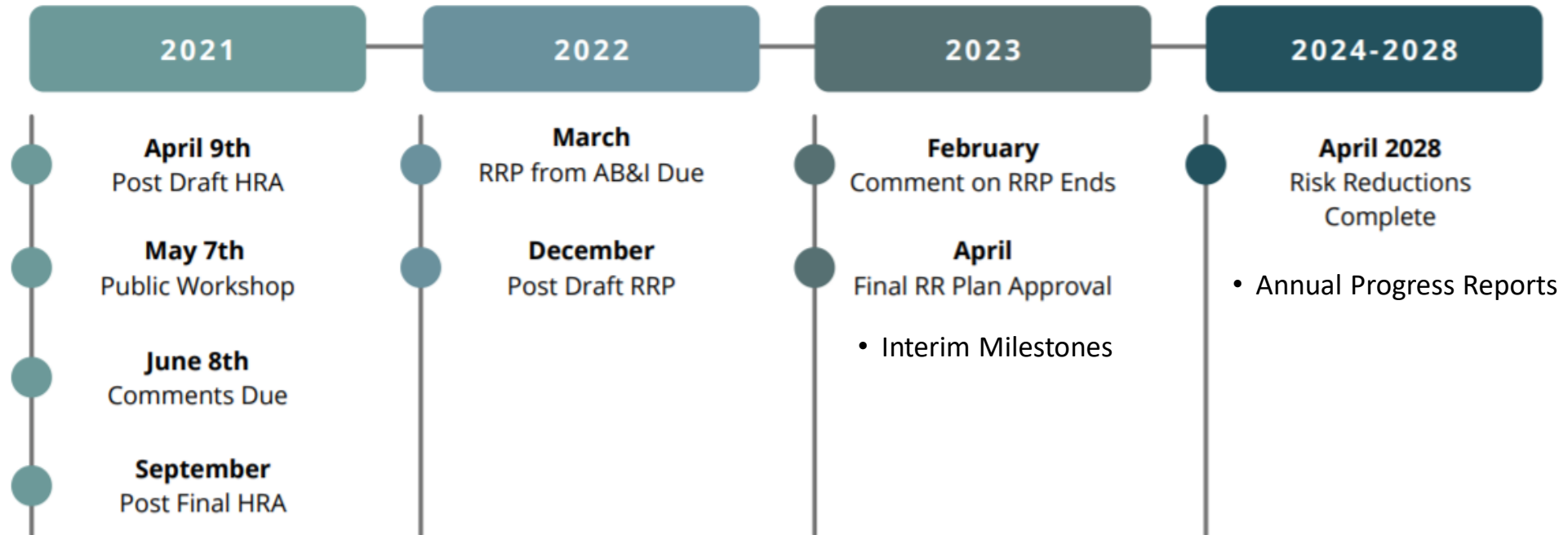
- Cancer Risk from Hexavalent Chromium
- Health Impacts from Odors
- Time Allowed to Complete Risk Reductions
- Minimizing Health Impacts Immediately

AB&I Foundry Timeline



AB&I Health Risk Assessment Timeline

Current schedule for the AB&I Health Risk Assessment (**HRA**) actions and estimated schedule for the key Risk Reduction Plan (**RRP**) milestones.



** This schedule is tentative and subject to change.

Anticipated Schedule in June 2020



- **June of 2021**

- Send Preliminary HRAs for Facility Comment: 23 Phase I Facilities
- Initiate Data Collection: 28 Phase II-A Facilities

- **End of 2021**

- Send Preliminary HRAs for Facility Comment: All 34 Phase I Facilities

- **June of 2022**

- Post Draft HRAs for Public Comment: All 34 Phase I Facilities
- Post Draft Risk Reduction Plan for first Phase I 1 Phase I Facility

Anticipated Schedule as of June 2020



• End of 2021

- Send Preliminary HRAs for Facility Comment: 20 Phase I Facilities
- Post Draft HRAs for Public Comment: 9 Phase I Facilities
- Post Final HRAs: 6 Phase I Facilities
- Initiate Data Collection: 15 Phase II-A Facilities

• End of 2022

- Send Preliminary HRAs for Facility Comment: All 34 Phase I Facilities
- Post Draft HRAs for Public Comment: 24 Phase I Facilities
- Post Final HRAs: 20 Phase I Facilities
- Post Draft Risk Reduction Plan for AB&I Foundry 1 Phase I Facility
- Initiate Data Collection: 15 Phase II-A Facilities

• End of 2023

- Post Final HRAs for Public Comment: All 34 Phase I Facilities
- Post Draft Risk Reduction Plans: 9 Phase I Facility (estimate)

Reasons for Delays



- Crematory Expansion Permits Due to COVID 19
 - Engineering Evaluations
 - HRA Work
- New Source Review HRAs for High Priority Projects
 - Bayview/Hunters Point Applications
 - Schnitzer Steel Thermal Oxidizer Application
- Work on Permit Reform Regulatory Concepts
 - Cancer Burden Analyses
 - Alternative Cancer Risk Limits
- Staffing
- Public Workshops

Questions





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AGENDA: 4

Improving the Rule Development Process

**Stationary Source and Climate Impacts
Committee Meeting
June 21, 2021**

**Greg Nudd
Deputy Air Pollution Control Officer
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Presentation Outcome



Provide a status update on Air District rule development efforts, including proposed changes to the rule development process to improve transparency and to ensure a more predictable and regular rule development schedule.

Presentation Outline



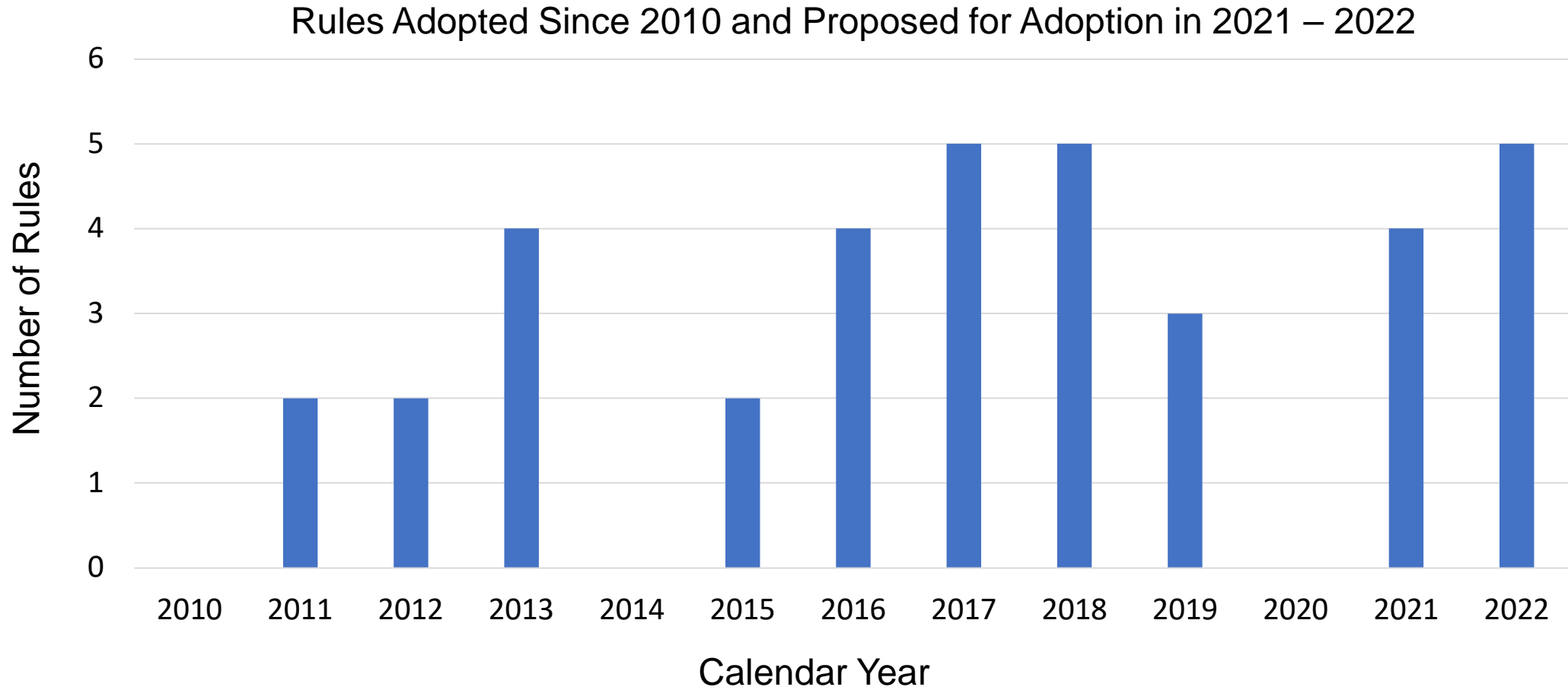
- Ten (10) Year Look-Back
- Rules In Process
- Strategic Actions and Target
- Questions and Comments

Presentation Requested Action



- No Action Requested

10 Year Look-Back



Rules In Process



Regulation/Rule Under Development	Nov 21	Dec 21	Jan 22	Feb 22	Mar 22	Q3 22
Rule 6-5: Refinery Fluid Catalytic Crackers (AB 617 BARCT)						
Rule 13-5: Hydrogen Plants	BH					
Regulation 1: Definition of Refinery	BH					
Rule 2-5: Toxic New Source Review		BH				
Rule 9-4: Residential Furnaces Rule 9-6: Gas-Fired Water Heaters				BH		
Rule 8-8: Rule Petroleum Wastewater Treating (AB 617 BARCT)					BH	
Rule 8-5: Organic Liquid Storage Tanks (AB 617 BARCT)						BH
Rule 8-18: Refinery Heavy Liquids Leaks (AB 617 BARCT)						BH

BH = Board Hearing

Strategic Actions



- Develop detailed white papers before rulemaking process begins
 - Previous technical analysis performed during creation of plans, such as the Clean Air Plan
 - Previous process isn't agile for adjusting to changing conditions
 - Front load technical analyses to determine best path forward

Strategic Actions, Cont'd



- Public Process to Prioritize Rulemaking Projects
 - Large number of potential projects and commitments
 - 2017 Clean Air Plan, West Oakland Community Action Plan, Advisory Council Particulate Matter Strategy Report, community concerns, “outdated” provisions in current regulations, etc.
 - Streamlined prioritization process is needed to provide stability
 - Prioritization criteria to be developed
 - Improved transparency of rulemaking priorities

Strategic Actions, Cont'd



- Air District measures from the West Oakland Action Plan (WOCAP) that may involve rulemaking

Source/Rule Under Review	Considerations
Construction & Concrete Batch Plants (i.e., dust)	West Oakland Community Action Plan (WOCAP) Further Study Measure (no timeline); reduces particulate matter in impacted communities
Rule 13-4: Sewage Treatment & Anaerobic Digestion	WOCAP #72 (development: 2020, action: 2021)
Rule 8-45: Autobody Repair	WOCAP #71 (development: 2023, action: 2024)
Rule 12-13: Foundry & Forging Operations	WOCAP #68 (development: 2024)
Rule 6-4: Metal Recycling & Shredding Operations	WOCAP #68 (development: 2024)
Rule 6-2: Commercial Cooking Equipment	WOCAP #87 (incentives or regulation – no timeline); reduces particulate matter, air toxics in impacted communities
Rule 6-3: Wood Burning Devices	WOCAP Further Study Measure (no timeline); reduces particulate matter, air toxics in impacted communities

Strategic Actions, Cont'd



- Assembly Bill (AB) 617 Best Available Retrofit Control Technology (BARCT) Schedule Rules and Other Air District Commitments

Source/Rule Under Review	Considerations
Rule 9-13: Portland Cement Manufacturing	AB 617 BARCT – must be completed by end of 2023
Rule 9-14: Petroleum Coke Calcining Operations	AB 617 BARCT – must be completed by end of 2023
Rule 9-7: Boilers, Steam Generators, & Process Heaters	Similar rules addressing NOx from furnaces and water heaters are scheduled for Board consideration in 2022
Regulation 2: Permitting (Rules 2-1 & 2-2: Particulate Matter in New Source Review)	Proposed amendments to Regulation 2 will be considered by the Board in 2021, but amendments do not focus on particulate matter

Strategic Actions, Cont'd



- Potential Prioritization Criteria:
 - Potential for exposure reduction
 - Emissions contribution of source (regional/local)
 - Feasibility (cost, available control technologies)
 - Pollutant type (criteria, greenhouse gas, toxics)
 - Level of community concern
 - Source characteristics (location, number)
- Discuss criteria with public late summer/early fall
- Set a general rule development target
 - Consider priorities, level of complexity, resources available

Feedback Requested/Prompt



Questions and Comments?