

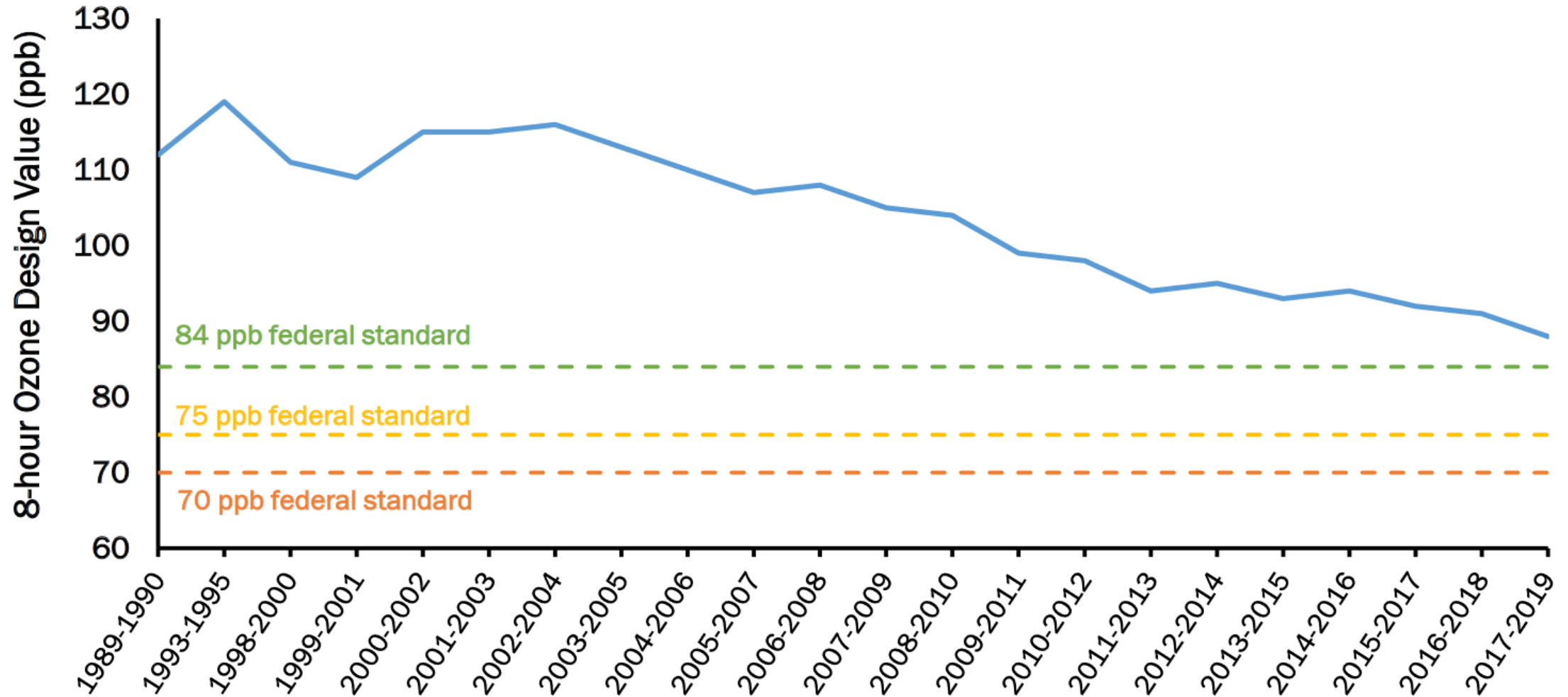
# Adopt Proposed 2020 Reasonably Available Control Technology (RACT) Demonstration and Emissions Statement Program Certification for the 2015 8-hour Ozone Standard

San Joaquin Valley Air Pollution Control District  
Governing Board Meeting  
June 18, 2020

# Valley Progress Towards Attaining Federal Ozone Standards

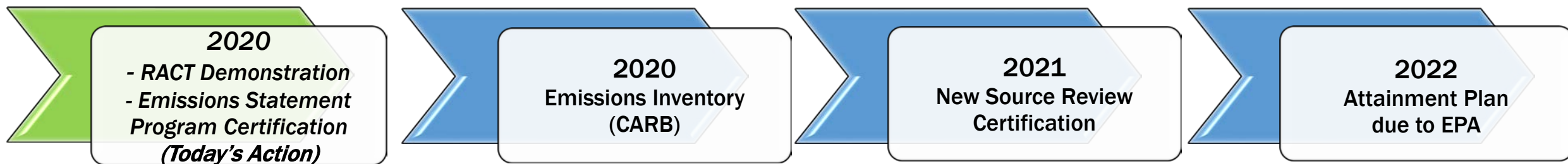
- Ozone formed by reactions between ozone precursor emissions and sunlight
  - NO<sub>x</sub>: combustion primarily from mobile sources
  - VOCs: biogenic, consumer, stationary, mobile sources
- Long history of developing and implementing ozone air quality strategies, with numerous plans achieving significant NO<sub>x</sub> and VOC reductions
  - Adopted nearly 650 of the most stringent rules in the nation
  - Nation-leading state mobile source strategies
  - Innovative clean air incentive programs accelerating deployment of cleanest technologies (\$3 billion public/private investment)
  - Latest ozone plan adopted in 2016 for 2008 standard (approved by EPA in 2018)
- Significant emissions reductions have led to sustained and measureable ozone air quality improvements

# Valley 8-hour Ozone Design Value Trend



# 2015 8-hour Ozone Standard Requirements

- EPA required to review standards for ozone, PM2.5, and other criteria pollutants every 5 years through extensive process
- October 2015 – EPA lowered the 8-hour Ozone Standard to 70 ppb
- Due to Valley geography and meteorology being conducive to ozone formation, region classified as “Extreme” nonattainment by EPA in 2018
  - Establishes attainment deadline of 2037
- EPA’s new implementation rule identifies planning elements required to be submitted to EPA, and timelines for when each element is due



# Reasonably Available Control Technology (RACT) Demonstration

- Federal Clean Air Act (CAA) requires the District to implement RACT requirements for sources that are subject to EPA Control Techniques Guidelines (CTGs) and for “major sources” of VOC and NOx
  - RACT is lowest emission limitation for application of control technology that is reasonably available considering technological and economic feasibility
- Proposed *2020 RACT Demonstration* builds upon comprehensive analyses conducted in past RACT SIPs and attainment plans
  - Comprehensive EPA review of District rules for *2014 RACT SIP for the 2008 8-Hour Ozone Standard*, federally approved in 2018
  - RACT analysis supported by extensive analysis in *2018 PM2.5 Plan* and expedited BARCT review under AB 617
  - District rules generally far exceed RACT requirements

# 2020 RACT Demonstration Process

- District conducted careful evaluation of NO<sub>x</sub> and VOC rules
  - Review and comparison to federal and state regulations, and technology guidelines
  - Comparison to analogous regulations adopted by air districts: Bay Area AQMD, Sac Metro AQMD, Ventura County APCD, and South Coast AQMD
  - Review of sources subject to EPA's CTGs and major non-CTG sources
- Identification of EPA CTGs with no emissions sources in Valley, resulting in re-affirmation of 8 Negative Declarations
- Thorough analysis concluded that District rules fulfill RACT requirements for the 2015 8-hour Ozone Standard

# Emissions Statement Program Certification

- Clean Air Act requires air districts designated as nonattainment for ozone to report NO<sub>x</sub> and VOC emissions from sources on annual basis
- District Emissions Statement Program implemented through SIP-approved District Rule 1160 (Emission Statements), adopted in 1992
  - Applies to stationary sources which emit NO<sub>x</sub> or VOCs above specified thresholds
  - Requires submittal of annual emission statements
- EPA implementation rule for 2015 8-hour Ozone Standard requires that air districts review existing emissions statement programs
- District and CARB have determined that Rule 1160 and emissions inventory process implement requirements for 2015 Standard
  - Certification prepared for submittal to EPA

# Development of 2022 Ozone Plan

- District working with CARB to conduct initial regional modeling and other air quality analyses
- New plan to build on ongoing efforts by CARB, EPA, residents, businesses, and other Valley stakeholders to implement existing plans and strategies
  - Coordinate plan strategies to effectively meet overlapping requirements
  - In addition to direct PM<sub>2.5</sub>, *2018 PM<sub>2.5</sub> Plan* focuses on reducing NO<sub>x</sub> emissions, which will help with both ozone and PM<sub>2.5</sub> air quality challenges
- New ozone plan will be developed through extensive public process
- District will regularly present updates about plan development at public workshops and meetings, including meetings of the Governing Board, Citizens Advisory Committee, and the Environmental Justice Advisory Group

# Public Process

- **February 20, 2020:** Presented update to your Board on planning process for 2015 Ozone Standard, including *RACT Demonstration* and Emissions Statement Program Certification requirements
- **March 17, 2020:** District held public workshop to discuss planning process for 2015 8-hour Ozone Standard and analysis being conducted for *2020 RACT Demonstration*
- Regular updates provided at Governing Board, CAC, and EJAG meetings
- **May 19, 2020:** *2020 RACT Demonstration* and Emissions Statement Program Certification published for 30-day public review and comment prior to today's public hearing

# Recommendations

1. Adopt the Proposed *2020 RACT Demonstration* and Emissions Statement Program Certification for the 2015 8-Hour Ozone Standard
2. Authorize the Chair to sign the resolutions adopting the Proposed *2020 RACT Demonstration* and Emissions Statement Program Certification
3. Direct staff to forward the adopted *2020 RACT Demonstration*, Emissions Statement Program Certification, and the attached resolutions to CARB for approval and submittal to EPA