



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

Draft Rule 11-18: Toxic Risk Reduction

**BACWA Executive Board
Meeting
December 16, 2016**

**Eric Stevenson
Director of Meteorology,
Measurement, and Rules**



Overview

- Air Toxics Control Programs
- Overview of Draft Rule 11-18
- Next Steps
- Summary
- Q & A



Control of Air Toxics

Three Programs:

1. Toxic New Source Review Program
2. AB 2588 “Hot Spots” Program
3. Air Toxics Control Measures and Rules



Control of Air Toxics

Toxics New Source Review Program

- Prevents significant increases in health risks
- Requires HRAs for new & modified sources of toxic emissions
- Best Available Control Technology for Toxics for significant new or modified sources
- Requires updated control for modified older, more highly polluting equipment



Control of Air Toxics

AB 2588 “Hot Spots” Program

- Enacted 1987
- Facilities report toxic emissions to Air District
- Notify if risk exceeds threshold
- Reduce risk if risk exceeds risk action level
- Program is not sufficient
 - HRAs up to 20 years old
 - Diesel PM was not included
 - Does not reflect new health risk information
 - Does not consider background risks
 - Is not flexible



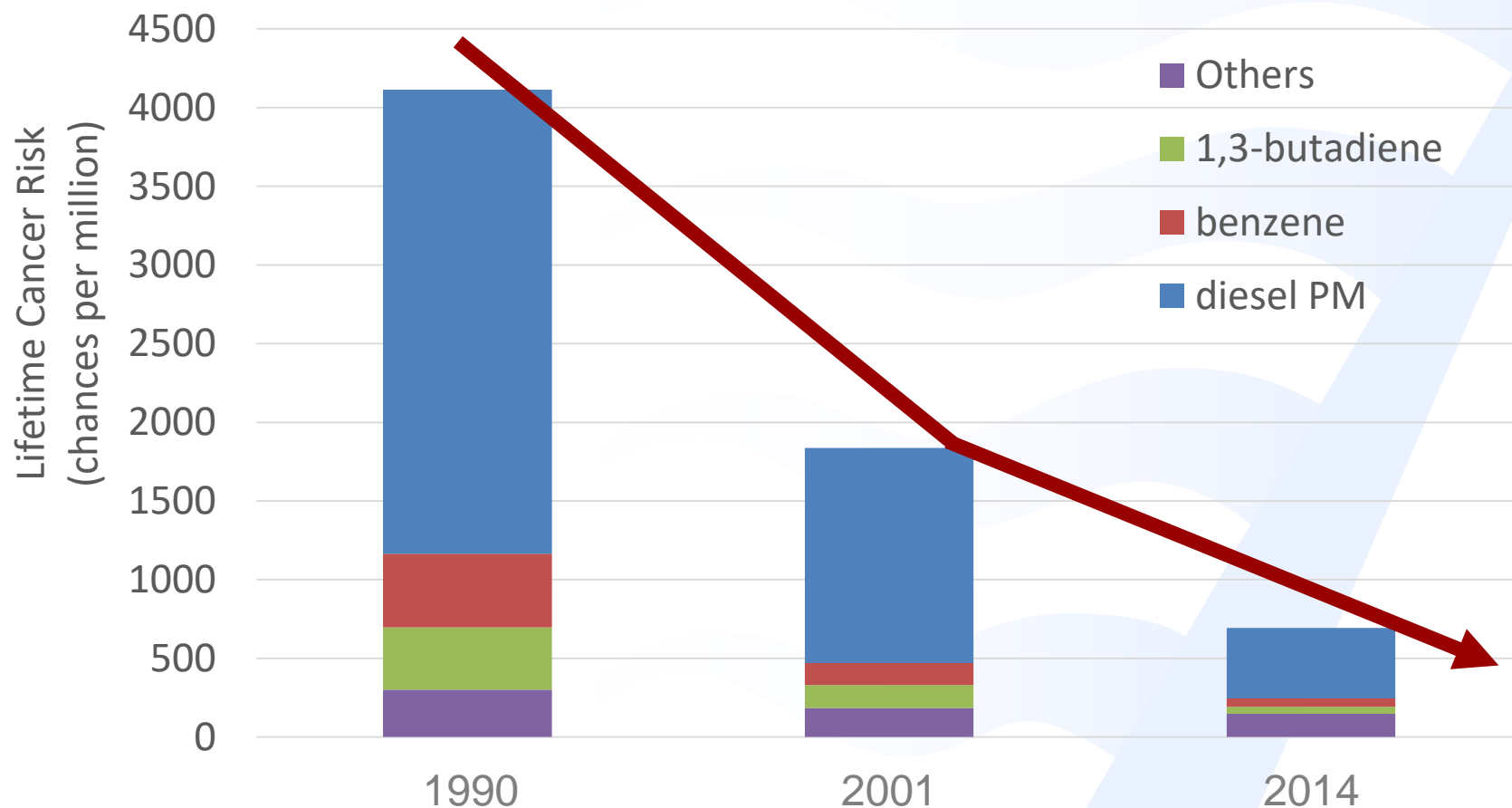
Control of Air Toxics

Air Toxics Control Measures

- > 30 source-specific rules affecting toxic emissions
- National Emission Standards for Hazardous Air Pollutants (NESHAPs)
- State Airborne Toxic Control Measures (ATCMs)
- Air District Developed Measures and Rules

Control of Air Toxics

Bay Area risk levels decline since 1990





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Reduce Health Risks to Lowest Achievable Levels

- Benefits impacted areas
- Incorporates latest health risk methodologies
- Promotes continuous improvement
- Ensures public transparency
- Provides greater flexibility



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- Reduces facility risk action level from 100 in a million to 10 in a million
- Incorporates new OEHHA Guidelines and health values
- In the Bay Area facilities potentially affected include:
 - refineries
 - gas stations
 - hospitals
 - foundries
 - military facilities
 - landfills
 - crematoria
 - sewage treatment
 - chemical plants
 - data centers
 - schools / universities
 - power plants

A photograph of the San Francisco skyline at night, with the city lights reflecting on the water. A large, multi-masted sailing ship is visible on the left side of the image.

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- **Air District staff will conduct health risk assessments**
- **Facilities above 10 in a million must:**
 - Develop a risk reduction plan for Air District approval
 - Execute plan according to plan schedule
- **Risk reduction measures include:**
 - Installation of Best Available Retrofit Control Technologies for Toxics (TBARCT)
 - Modification of operating hours and activity levels
 - Modification of emissions point characteristics

A photograph of the Golden Gate Bridge in San Francisco, California, spanning the Golden Gate Strait. The bridge is a suspension bridge with two large towers and is painted in its iconic orange-red color. The water is blue, and the sky is clear.

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Implementation Approach

- Prioritize facilities
- Conduct Health Risk Assessment (HRA)
- Public Comment on HRA
- Publish HRA results to BAAQMD website & email subscription list
- Risk Reduction Plan
 - Publish requirement, submission and implementation status to BAAQMD website & email subscription list
 - 3-year implementation timeline
 - Could require faster implementation for CARE Communities



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Implementation Phases

- **Phase 1 (Prioritization Score > 250)**
 - Health Risk Assessments (2017-2018)
 - Risk Reduction Plan development and approval (2018-2019)
 - Risk Reduction Plan implementation (2019-2022)
- **Phase 2 (Prioritization Score > 10)**
 - Multiple-source facilities (2019-2025)
- **Phase 3**
 - Diesel internal combustion engines (2021-2027)
- **Phase 4**
 - Retail gas stations (2023-2028)



Next Steps

- **Continue meetings and presentations to interested groups**
- **Form Technical Working Group—Early 2017**
- **Public Hearings—May 2017**
 - Publish for review and comment March 2017
 - Proposed rule language
 - Staff Report
 - Socioeconomic Analysis
 - CEQA Environmental Impact Report



In Summary

- Long history of controlling toxic emissions
- Risk levels continue to decline – more work needed
- Rule 11-18 would:
 - Reduce health risk to lowest levels feasible
 - Benefit impacted areas
 - Promote continuous improvement
 - Ensure public transparency
 - Provide greater flexibility
 - Phased Implementation – high risk facilities controlled first



Contact Information | Q&A

Eric Stevenson

Director of Meteorology, Measurement, and Rules

estevenson@baaqmd.gov

(415) 749-4695

Staff Lead

Victor Douglas

Principal Air Quality Engineer

Rule Development Section

vdouglas@baaqmd.gov

(415) 749-4752