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To: [Fine, Rebekka@ARB](mailto:Fine,Rebekka@ARB)
Cc: [Cuevas, Cesar@ARB](mailto:Cuevas,Cesar@ARB)
Subject: Re: Data Request Regarding the CA RH SIP
Date: Friday, May 27, 2022 6:07:57 PM

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Thanks for your response. However, I'm a little confused.

Regarding Item 2, which requested any information that summarizes the types of pollution controls currently installed on the units for which the emissions are provided, I understand that CA's air authority is spread out among you folks and the various air districts. However, this is a State Implementation Plan. Therefore, whoever assembles it is required to have all authority necessary in order to prepare an approvable SIP. But you're telling me that you don't have the ability to gather fundamental data that is necessary in order to properly conduct control cost analyses? You realize there is no way to assess whether a particular unit should receive additional controls unless you know what controls are currently installed on it, right? So when you makes statements that CARB is not reviewing a source for FFA because it is or will be subject to BARCT, and yet cannot provide any info on those controls, there is no way to verify that claim.

Item 3 inquired whether any of the emissions that result from AB 617 made federally enforceable in the SIP. I asked this question because of various statements in the SIP which I understood to mean that reductions from AB 617 are part of the reasonable progress demonstration. Below is a summary of some of those statements:

- On page 78, you indicate that sources that screened-in due to Q/d were reviewed to determine if a full four factor analysis should be completed, or if it was reasonable to conclude that a full four factor analysis would likely result in the conclusion that reasonable controls were in place and no further controls were reasonable at this time. You then discuss why BARCT should be considered a stringent level of control. Following this, you explain that AB 617 will expand BARCT and that due to AB 617, any additional BARCT controls must be in place by 12/31/23. Obviously, this is well within the second planning period.
- In the next paragraph, you state that "California views the implementation of BARCT level controls as equivalent to reasonable controls for regional haze planning purposes. Implementation of additional controls measures due to AB 617 will have a measurable impact on reducing air pollution, including reduction of particulate matter and particulate matter precursors that impair visibility. Stationary facilities implementing new control measures to meet the expedited BARCT requirements of AB 617 will have measures in place prior to 2028, the end of the second implementation period for regional haze purposes, and measures will be enforceable under State law and local rules."
- On page 121 you state that "[e]mission controls that will be in place at facilities subject to the AB 617 expedited BARCT requirement are expected to be equivalent or greater than BART." Again, the SIP is drawing equivalence between BARCT and a regional haze level of control and AB 617 expands BARCT.
- On page 80 you folks indicate that one of the reasons why Collins Pine was the only stationary source reviewed for a FFA was because it was not subject to AB 617.

I fail to see why anyone reading your SIP would not conclude that after you state that BARCT is equivalent to RP, that AB 617 will expand BARCT, and that those controls will be implemented by 12/31/23, that AB 617 is being used as a RP control measure and a reason not to require FFA on sources. And yet that seems to be what you're saying?

Regards,

Joe

"... and miles to go before I sleep."

—Robert Frost