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2008 Moderate Ozone SIP Rulemaking Stakeholder Meeting

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Dena Wojtach,
Sean Hackett, and Leah Martland
Air Pollution Control Division

Stakeholder Meeting Purpose

- Explain State Implementation Plan (SIP) and supporting regulations interaction
- Discuss expanded scope of potential rule revisions being considered
- Solicit stakeholder comments on potential rule revisions



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Background

- 1997 Ozone Standard – 85 ppb
- 2008 Ozone Standard – 75 ppb
 - July 20, 2012 Denver Metro/North Front Range (DMNFR) designated as “nonattainment” and classified “Marginal”
 - 3 years to comply
 - Minimal requirements
 - Legal challenge of EPA’s interpretation of 3 years
 - DMNFR failure to attain using 2012–2014 data
 - August 27, 2015 EPA proposed DMNFR “bump up” to “Moderate” classification
 - 3 more years to comply
 - Increased SIP requirements
 - Moderate SIP due in 2017
- 2015 Ozone Standard – 70 ppb



Rulemaking Goals

- Support the Regional Air Quality Council's (RAQC) Efforts
 - Include Required 8-Hour Ozone SIP Elements
 - Address Moderate nonattainment area Reasonably Available Control Technology (RACT) requirements
 - Strengthen Colorado's SIP
- Address EPA Concerns (previous Regulation 7 SIP revisions)



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Timeline and Schedule

- RAQC approval of SIP June 30, 2016
- Request for hearing July 21, 2016
- Hearing October 20, 2016
- Legislative SIP review Jan–May, 2017
- Submit SIP to EPA Mar–Jun, 2017
- Attain 2008 ozone NAAQS by July 20, 2018
(based on 2017 (Jan–Dec) ozone season)



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Multiple Rule Revisions

- Moderate nonattainment area SIP elements
 - Air Quality Standards – Mobile Source Emission Budgets
 - Regulation 11 – Inspection & Maintenance Program
 - Regulation 7
 - SIP strengthening: tank inspection and auto-igniters
 - Industrial solvent use RACT
 - Printing RACT
 - Major source RACT
 - Combustion adjustment RACT
 - General applicability
- SIP fixes
 - Dehy/gas plants monitoring, recordkeeping, reporting
- Other – Regulation 3



SIP Strengthening

- Include in Section XII
 - Auto-igniter requirements
 - On combustion devices
 - Weekly inspection
 - Currently state-only
 - Include in SIP
 - Condensate tank AVO requirements
 - Currently weekly inspections: combustion device, vapor recovery unit, control device, thief hatch
 - Include AVO tank inspections from Section XVII. in SIP
 - 6 tpy condensate storage tanks
 - Frequency of liquids load-out



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RACT Basics

- RACT SIP required for “Moderate” ozone nonattainment areas
- Definition of RACT
 - Lowest emission limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility
- SIP must include RACT determinations for
 - Major sources of VOC and/or NO_x (100 tpy – PTE)
 - VOC sources covered by a Control Technique Guideline (CTG)
 - RACT must be stated in a regulation
- Implement as expeditiously as practicable but no later than January 1, 2017
- SIP requirement is independent of previous RACT determination



Requirement to Adopt CTGs

- States must adopt RACT for VOC source categories in nonattainment area covered by an EPA CTG
 - CTGs are not directly enforceable
 - RACT SIP must achieve a similar level of control
- APCD is proposing additional requirements for CTGs
 - Industrial cleaning solvent use
 - Lithographic and letterpress printing



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General Solvent Use RACT

- Industrial cleaning solvents (X)
 - Applicability
 - Exemptions
 - Operations subject to other federally enforceable requirements
 - Control requirements
 - Limit VOC content of solvent, or
 - Limit vapor pressure of solvent
 - Work practices
 - Recordkeeping
 - Implement by January 1, 2017



Printing RACT

- Lithographic and letterpress printing (XIII)
 - Applicability
 - Work practices
 - Ink VOC content
 - Cleaning materials
 - Fountain solutions
 - VOC control
 - Monitoring and recordkeeping
 - Implement by January 1, 2017



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Major VOC and NOx Source RACT

- RACT must be implemented by January 1, 2017
 - Controls that cannot meet this date are not RACT
 - Original date was January 1, 2018
- Not feasible to install new controls this quickly
 - APCD is proposing existing requirements or practices as major source RACT

NOTE: APCD will continue to review major sources and propose RACT revisions after SIP submittal as appropriate



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Major Source RACT

- Combustion process adjustment (XVI)
 - Combustion equipment at major NOx sources
 - Annual tuning, work practices
 - Recordkeeping
 - Reporting



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Major Source RACT

- Major source RACT requirements (XIX)
 - Major source – emits or potential to emit greater than 100 tpy NOx or VOC
 - List all sources
 - Specify RACT limits or standards for some sources
 - Monitoring
 - Recordkeeping
 - Reporting



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SIP Fixes

- **Monitoring, recordkeeping, reporting**
 - Natural gas processing plants
 - Currently conduct NSPS LDAR
 - Reference NSPS recordkeeping and reporting in SIP
 - Glycol natural gas dehydrators
 - Currently 90% control requirement
 - Include monitoring and recordkeeping in SIP
 - Weekly inspection of control device
 - Emission calculations
 - 5 year retention period
 - Include reporting in SIP
 - Semi-annual report: dehydrators and control equipment
- Renumber current XII.G.5. (exemption for natural gas compressor station or natural gas drip station) to XII.I.
- Typographical, grammatical, formatting errors



SIP Fixes

- Revert to approved language
 - Combustion devices (XII.C.1.d.)
 - Storage tank air pollution control equipment monitoring (XII.E.2.)
- Address discretionary language
 - Air pollution control equipment control efficiency (XII.C.1.c.)
- Revise EPA review requirements
 - Storage tank emission factors (XII.C.2.a.(ii)(B))
 - Dehydrator emission calculations (XII.H.4.)



Next Steps

- APCD: Prepare supporting documents for July Air Quality Control Commission(AQCC) Request for Hearing
- All: Review and share any comments
- All: Track AQCC efforts
 - July 2016 Request for Hearing
 - October 2016 Hearing



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Public Engagement

For more rulemaking information

➤ Watch website:

www.colorado.gov/pacific/cdphe/ozone-information

➤ Sign up to receive announcements:

www.colorado.gov/pacific/cdphe/air-mailing-lists

➤ Submit comments or questions to:

cdphe.commentsapcd@state.co.us



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