Message

From: Yannayon, Laura [Yannayon.Laura@epa.gov]
Sent: 3/22/2021 6:54:43 PM
To: Susan Nakamura [SNakamura@aqmd.gov]; Zabel, Allan [Zabel.Allan@epa.gov]; Israels, Ken [Israels.Ken@epa.gov]; Bushey, Douglas [bushey.douglas@epa.gov]
CC: Barbara Baird [BBaird@aqmd.gov]; Michael Krause [MKrause@aqmd.gov]; Michael Morris [mmorris@aqmd.gov]
Subject: RE: Comments from Industry Stakeholders

Hi Susan,
Thanks for the heads up. I was on your last call and heard some of what Mike said and it flagged for me that the details of this "transition" / "bridge" out of RECLAIM need to be explored in more detail.

I can share that Mike and no other industry contacts have talked to EPA about any topics regarding RECLAIM, so I don't know where Mike is getting his info from.

You are correct that EPA raised the issue of how the District intends to transition from RECLAIM to the command and control rules. Sources can't get out of RECLAIM until EPA approves the revisions to Reg. XX in the SIP, along with the Landing rules. Reg. XX should detail how this will actually work and SC/EPA need to discuss this further. We'd like to see SC come with suggested approaches that we can weigh in on.

We look forward to discussing these issues with you. A reminder that I will be out of the office next week.

Laura

From: Susan Nakamura <SNakamura@aqmd.gov>
Sent: Sunday, March 21, 2021 4:34 PM
To: Yannayon, Laura <Yannayon.Laura@epa.gov>; Zabel, Allan <Zabel.Allan@epa.gov>; Israels, Ken <Israels.Ken@epa.gov>
Cc: Barbara Baird <BBaird@aqmd.gov>; Michael Krause <MKrause@aqmd.gov>; Michael Morris <mmorris@aqmd.gov>
Subject: Comments from Industry Stakeholders

Hi Laura, Allen, and Ken,
I wanted to give you a heads up that we have heard from two refineries and Mike Carroll that U.S. EPA has said that we cannot exit any facilities from RECLAIM until the landing rules have been fully implemented. Initially this comment was referenced as they heard a "rumor." At our Stationary Source Committee on Friday, Mike Carroll seemed more definitive in his comments.

Mike's comments are on the You Tube video at: 40 minutes
South Coast AQMD Stationary Source Committee Meeting - March 19, 2021 - YouTube

South Coast AQMD staff has had a brief discussion with U.S. EPA of "bridge" requirements to ensure as we exit facilities that there are BARCT requirements. However, I did not think there were any definitive recommendations from U.S. EPA on this issue.

I will ask Jacob to set up a meeting so we can discuss. No response to this email is needed. I just wanted to give you a heads up so you know why we are scheduling the meeting.
Thank you,
Susan