Message

From: Yannayon, Laura [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0EC245483F2D4762801CD01D01220F92-LYANNAYO]
Sent: 11/5/2020 5:20:26 PM
To: Michael Morris [mmorris@aqmd.gov]
Subject: RE: RECLAIM/NSR discussion

Thanks! I'll look for the zoom invite.

Laura

From: Michael Morris <mmorris@aqmd.gov>
Sent: Thursday, November 5, 2020 8:37 AM
To: Yannayon, Laura <Yannayon.Laura@epa.gov>
Cc: Susan Nakamura <SNakamura@aqmd.gov>; Law, Nicole <Law.Nicole@epa.gov>; Uyen-Uyen Vo <uvo@aqmd.gov>; Lizabeth Gomez <LGomez@aqmd.gov>
Subject: Re: RECLAIM/NSR discussion

Hi Laura,
11/12 at 9 am works for us. We will send you a Zoom invite. Thanks!!

In response to your questions/clarifications below:

1. For discounting ERCs, we mean using a BARCT adjustment both at time of ERC generation and ERC time of use
2. The three specific Rule 1306 topics are as follows:
    a. 1306 (c)(1) - Time period for calculating emission decreases: Specify that the two year period immediately preceding the request for ERC means two calendar years to coincide with our AER records. If the EO allows a more representative time period (up to five years) then those would also be defined by calendar years. This could eliminate some portion of the fifth year from consideration.
    b. 1306 (c)(1) and (c)(2) - Records for estimating throughput and emission rate: Specify that company records shall include number of days operated. We are considering implementing this through our AER reports requiring days of operation be included when they provide annual emission data. We are also considering your (and others) suggestion that we move away from a daily or monthly calculation and use an annual calculation. The annual calculation would eliminate this issue.
    c. 1306 (c)(3) - Usage Factor: Remove the usage factor and rely on actual days of operation to determine daily emissions. As above, we are also considering using an annual calculation which would eliminate this issue.

Yes...these are all NSR issues so Nicole's team doesn't need to be there.

Regards,
Mike

From: Yannayon, Laura <Yannayon.Laura@epa.gov>
Sent: Wednesday, November 4, 2020 1:11 PM

To: Michael Morris <mmorris@aqmd.gov>
Cc: Susan Nakamura <SNakamura@aqmd.gov>; Law, Nicole <Law.Nicole@epa.gov>
Subject: RE: RECLAIM/NSR discussion

Hi Mike,
I checked our collective calendars and we are really booked. The first time we can hold a call with you is on 11/12 at 9 am. Can you let me know if that will work for you? That will also give us a bit of time to discuss the issues you listed below.

I had a couple of clarifying questions that will help us provide better responses.

1. "We also want to know if we can proceed on changing surplus discounting for ERCs (BARCT instead of BACT discount)." Currently the rules only requiring BACT adjustment at the time of ERC generation, and no adjustment at time of use. Are you asking: 1) Can you change to only BARCT adjustment at time of ERC generation? Or 2) BARCT adjustment both at time of ERC generation and ERC time of use (as required by federal rules)?
2. "Lastly, we wanted to know if you had any additional thoughts regarding the three other changes to the quantification approach (calendar years, additional records, removing usage factor)." Can you provide a more complete summary of what each of these entails? For example, what the current rule requires and what you want it to require after the revisions? I think I know what you are talking about in each case, but I am not certain, and it would be helpful info for us to discuss as a group here at EPA.

Thanks!
Laura

PS. Assuming you won't need staff from Nicole's group because these are all NSR issues.

From: Michael Morris <mmorris@aqmd.gov>
Sent: Wednesday, November 4, 2020 8:34 AM
To: Yannayon, Laura <Yannayon.Laura@epa.gov>
Cc: Susan Nakamura <SNakamura@aqmd.gov>; Law, Nicole <Law.Nicole@epa.gov>
Subject: RECLAIM/NSR discussion

Hi Laura,
We wanted to follow up our discussion last week and see if your team had any new thoughts or guidance.

I believe your position is clear with respect to quantifying orphan shutdowns (provide supporting data) and RTCs-to-ERCs (no). We are very interested in further discussing the co-pollutant issue. We also want to know if we can proceed on changing surplus discounting for ERCs (BARCT instead of BACT discount). Lastly, we wanted to know if you had any additional thoughts regarding the three other changes to the quantification approach (calendar years, additional records, removing usage factor).

Is your team available to meet later this week?

Regards,
Mike