

MEMORANDUM

TO: Community Advisory Council Members

FROM: Rebecca Armstrong

DATE: September 26, 2007

SUBJECT: New Rule 361 – Small Boilers, Steam Generators, and Process Heaters
Proposed Amended Rule 202 – Exemption to Rule 201 (Permits Required)

Enclosed please find Draft New Rule 361 and Proposed Amended Rule 202 currently scheduled for the December 20, 2007 APCD Board Hearing. Also enclosed you will find a copy of additional background information regarding these rulemaking efforts, a Rule 361 Flow Diagram, and a copy of the public comments (with APCD staff responses) received to date.

Proposed amendments to Rule 202 and new Rule 361 will require permits and emission limit compliance for subject small boilers, steam generators, and process heaters. The primary objective of the rule is to reduce Oxides of Nitrogen from small boilers, steam generators, and process heaters (greater than 2 MM Btu/hr to less than 5 MM Btu/hr). We currently have rules for smaller (Rule 360 – 75,000 to 2 MM Btu/hr units) and larger (Rule 352 – 5 MM Btu/hr and greater units) units of this type. This rule will fulfill the Santa Barbara Air Pollution Control District's (APCD) "all feasible measures" requirements included in our 2007 Clean Air Plan.

APCD staff held two Public Workshops for this rulemaking process on August 28 and 29, 2007. At these workshops, we received public input including comments and questions regarding these two proposed rules. We have also since received written public comments. At this CAC meeting, we will give an overview of Draft New Rule 361 and Proposed Amended Rule 202. Additionally, we will discuss the public comments that we have received to date and get your input regarding these rules.

Attachments: Draft Rule 361
Draft Rule 202
CAC Meeting (10/10/07) Rulemaking Background Information
Draft Rule 361 Flow Diagram
Responses to Public Comments Received (as of September 26, 2007)