




MEMORANDUM

DATE: March 26, 2021

TO: Community Advisory Council (CAC) Members

FROM: Aeron Arlin Genet, Air Pollution Control Officer 

SUBJECT: Community Advisory Council Update

The last meeting of the Community Advisory Council (CAC) occurred on July 22, 2020. As per the CAC by-laws, if there are no planning or rulemaking matters to discuss, District staff provides a quarterly update to the CAC. The last update to the CAC was in November 2020 and can be found [here](#) on our website.

The following items are provided as a quarterly status update.

Draft Proposed Rule 363, Particulate Matter (PM) Control Devices

As relayed in the November 2020 update, staff have been working to develop and refine this rule, pursuant to the District's Board-adopted Assembly Bill (AB) 617 Best Available Retrofit Control Technology (BARCT) Rule Development Schedule.¹ Rule 363 is the third rule of the District's AB 617 BARCT rule schedule, and it regulates particulate matter (PM) control devices such as baghouses, cyclones, and wet scrubbers. The rule is designed to require visible emission observations and maintenance checks on the control equipment to make sure that they are properly maintained and not venting excessive amounts of PM. Large baghouses would also be required to use a bag leak detection system and be source-tested to demonstrate compliance with the emission limits in the rule. The District plans to present this rule to the CAC in April via remote participation only. After CAC review, the proposed rule will be presented to the District Board for consideration, tentatively set for June 2021.

Future BARCT Rules

After Rule 363, there are three additional rule development efforts on the District's BARCT rule development schedule. District staff have been working with the affected sources to see if the control technologies can be adopted and enforced without adopting or revising a rule (for example, through enforceable permit conditions or other means). The remaining three BARCT efforts are listed below:

- Rule 333, Control of Emissions from Reciprocating Internal Combustion Engines (revision of an existing rule)
- Rule 358, Stationary Gas Turbines (revision of an existing rule)

¹ More information is available at <https://www.ourair.org/wp-content/uploads/2018-12bd-d5.pdf>

- Rule 362, Nitrogen Oxides (NOx) from Miscellaneous Combustion Sources (new rule)

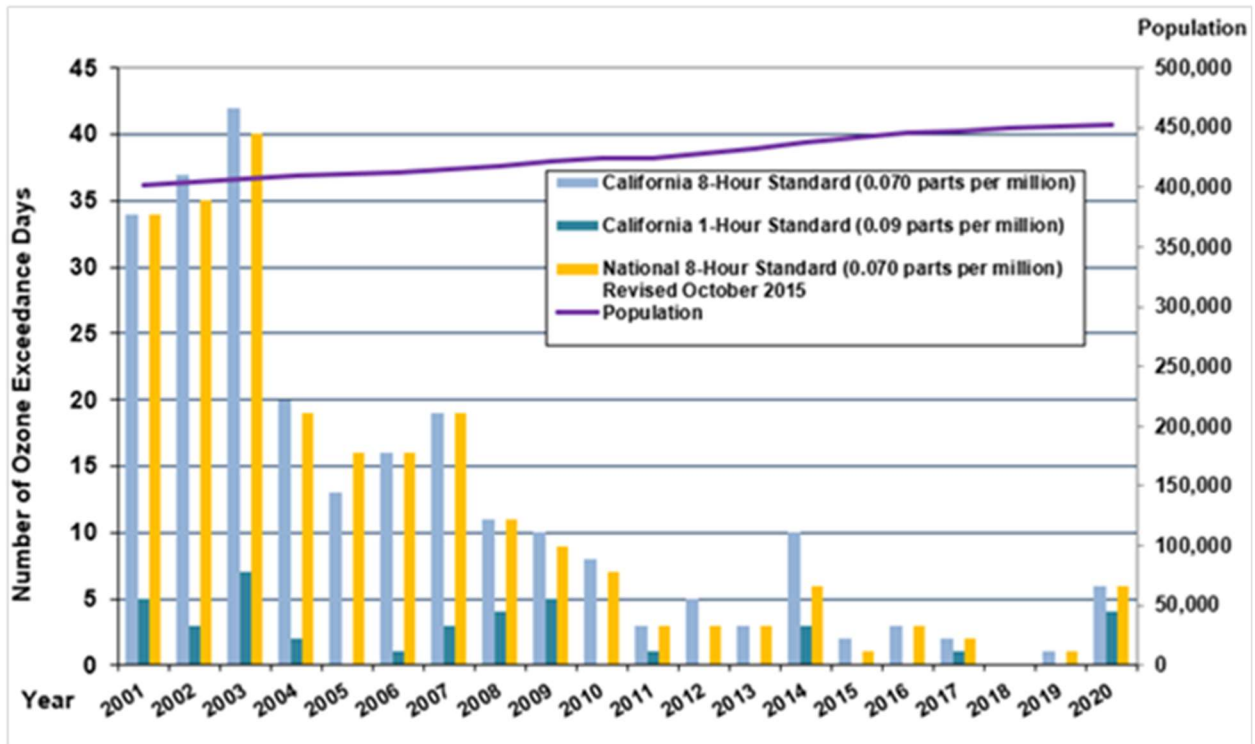
The plan is to work on Rules 333 and 358 first; per legislative requirements in AB 617, all BARCT measures should be in place and effective by December 31, 2023.

Change in Designation for State Ozone Standard

The District has made tremendous progress toward meeting the two California ozone standards: 1) one-hour standard of 0.09 ppm (established in 1988), and 2) eight-hour standard of 0.070 ppm (established in 2005). The number of recorded exceedances of these standards has trended down over time while population has increased, as indicated in the chart below. In fact, ozone measurements for the three-year data set from 2016 to 2018 were so low that the District was designated as attainment in 2020. Unfortunately, two measured values during 2019 that occurred during hot and stagnant conditions led to two violations of the 8-hour ozone standard. In February 2021, the California Air Resources Board (CARB) took action to redesignate Santa Barbara County as nonattainment with the state ozone standards. This setback highlights the challenges for the District and the state in meeting this standard given changing weather and climate patterns. The District provided a letter to CARB for this item: [SBCAPCD Letter to CARB - Proposed 2020 Area Designations](#).

As noted in the November 2020 CAC Update, the county experienced six exceedances of the state and federal 8-hour ozone standards and four exceedances of the state 1-hour ozone standard during August and October of 2020; during both of these periods, the region was also experiencing hot weather and impacts from catastrophic wildfires.

Santa Barbara County Ozone Exceedance Days
2001-2020



2022 Ozone Plan

With the ozone exceedances experienced in 2019 and 2020, Santa Barbara County will likely remain in nonattainment for the next several years. This nonattainment status means that the District is required to continue providing triennial updates to the air quality attainment plan for the state ozone standard, to ensure that the standard is eventually attained and then maintained. District staff will begin the process to develop a 2022 Ozone Plan in the fall of 2021, with the goal of bringing it to the CAC and District Board for consideration in 2022. The plan will examine current sources and levels of emissions, project future emissions, and propose feasible measures that can be implemented to meet California Clean Air Act goals.

This concludes the status update for this quarter. If you have any questions, please contact me (aag@sbcapcd.org) or Molly Pearson (mmp@sbcapcd.org).

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The CAC's charter is to consider issues related to air pollution planning and rulemaking for which the District has jurisdiction, and to render advice to the District Board and the APCO. The CAC serves an important function by providing expertise and representation of community interests during planning and rulemaking. The CAC's advice has helped the District Board adopt plans and rules, which have contributed to improving air quality in our county, and District staff appreciate the care and consideration you show in carrying out your service. These updates will also be posted to our website at www.ourair.org/community-advisory-council-info.