

April 9, 2019

*By email*

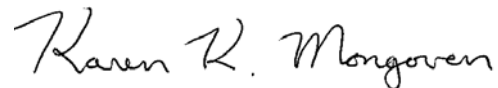
Mr. Raj Rao  
Mr. David Svendsgaard  
New Source Review Group  
Air Quality Policy Division  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
109 TW Alexander Drive  
Research Triangle Park, NC

Dear Raj and Dave,

On the March 13<sup>th</sup> National Association of Clean Air Agencies' (NACAA) Permitting and New Source Review Committee call, you reported that EPA is planning to significantly revamp the RACT/BACT/LAER Clearinghouse (RBLC). NACAA has long maintained that the RBLC is in urgent need of upgrading to a more modern, user-friendly platform, and we look forward to continued engagement with EPA on this project as it gets underway.

Many NACAA members have specific observations and recommendations that they would like EPA to take into consideration at the outset of this effort. I asked our members to send me these suggestions and have assembled them into the attached document. Thank you for your consideration, and please let me know if you have any questions.

Sincerely,



Karen K. Mongoven  
NACAA Senior Staff Associate

## Suggestions for RACT/BACT/LAER Clearinghouse Improvement

Offered by NACAA Members following March 13, 2019 Permitting and New Source Committee Call

**NOTE: Each recommendation or set of recommendations is separated by a line**

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- We propose that this project be approached slowly in the developing phase to ensure it is handled using the best available techniques. States should be involved early on so that the data entry fits what states have or could have with little difficulty and that searches are conveniently done. Purchasing commercially available software should be explored. States generally have expert IT professionals and could be used as part of the team EPA develops.
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The overall goal should be to make the RBLC user-friendly. Besides updating the software, the following items are things we would like to see in an updated RBLC to accomplish that goal:

**(1) The ability to amend and update fields of an existing determination**

Currently the system does not allow the user to go back and update entries once they have been entered and saved. This is a problem for the following reasons:

- There is no way to go back and update a BACT determination for a piece of equipment if it changes after the equipment has been constructed.
- There is no way to add or remove equipment to a project. It could take a few years for a project to be constructed and the company could add equipment or remove equipment during the construction phase which could have an impact on the BACT determinations.

**(2) The current system does not represent the equipment that has been constructed as part of project.**

This goes back to #1 as we can't update entries for our state. We are told to enter data into the system within 30 days of permit issuance. However, if we can't update the system then there is no way to go back and update a project to show what was actually constructed, whether compliance with the original BACT limit(s) was achieved, if any limits changed, etc. Having inaccurate data in any data set is a problem (garbage in = garbage out).

**(3) There needs to be a way to show compliance was demonstrated.**

This is one of the most common questions we receive, especially if the limit was set at a rate lower than any other BACT limits in the system. The current system has a box

where the user can check whether the unit has demonstrated compliance. This is a great idea, but it is not practical based on #1 and #2 above.

**(4) The ability to put in actual test results**

In addition to being able to show the equipment demonstrated compliance, the system should allow the user to put in the test result. If the actual test results are much lower than the BACT number it would be a reason for the next agency to consider establishing a lower BACT level. Too many applicants just assume they should get whatever number is the most recent in the RBLC.

**(5) Remove unnecessary data fields and keep data entry to a minimum.**

Are all of the data fields necessary? What are they used for? How often are they used? Some people love to collect data because they might use it, but we are all very busy. We want meaningful data. If the data is not used then remove it. Don't have a field just in case it could be used.

**(6) A "History" function**

It is important to be able to update the RBLC, but at the same time there needs to be a way to keep the original data that was entered for a particular project.

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1. There should be a way to only get the relevant part of a determination, instead of the complete determination. For example, if we want to get information on small boiler NOx BACT determination, then all the information on all the equipment in that category subject to BACT (including other pollutants) shows up.
  2. The instructions on how to search the RBLC should be clearly described with examples.
  3. There should be more options to filter the information from the reports.
  4. The field "compliance verified" is important and states should come back when stack test or CEMs data is available to provide this information; the user should be able to compare allowable and actual emissions.
  5. More technical details on equipment and APC devices should be provided.
  6. Emission credits information, if any, should be provided.
  7. Weblinks to final permits and technical support documents should be provided.
  8. LAER and BACT decisions for EGUs, in Lb per MW-hour, Lb per MMBTU, and ppmvd, with averaging times during ozone and non-ozone seasons should be provided.
  9. Case-by-case RACT determinations, with cost effectiveness information (dollars per ton of NOx removed), should be available.

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1. Overall rework of the system to modernize and make it more user friendly
  2. Currently terminology not easily understood and does not line up with how we write permits today
  3. Need to look at the entire process of entering information, having it reviewed and then available to the public
  4. Hard to get help currently when you have questions on entering information.
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- RBLC has ineffective filters. It needs to be more searchable. For example, when you are searching for combustion devices industry is not the best thing to search by because they are not industry specific.
  - The interface is awful – the user has to click on each and every result to see what the values are – comparing BACTs seems nearly impossible.
  - The format for how to enter BACT is not user friendly.
  - The person who enters the BACT should be able to update the BACT at a later date.
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1. For the past several months, California Air Resources Board (CARB) has been working closely with California local air districts on developing a AB 617 Technology Clearinghouse that will substantially revamp and improve CARB's BACT/BARCT Clearinghouse (See: <https://ww2.arb.ca.gov/our-work/programs/community-air-protection-program>). CARB's effort is similar to what EPA is planning to undertake. We strongly encourage EPA to contact Ms. Cassie Lopina, Manager of CARB's Technology Assessment Section, at [Cassandra.Lopina@arb.ca.gov](mailto:Cassandra.Lopina@arb.ca.gov) or (916) 324-0983 to ensure that EPA's future changes take into account and can accommodate CARB's substantial upcoming changes.
2. Any BACT determination submittal form to be developed by EPA should match the CARB BACT/BARCT Clearinghouse submittal form. The information fields on these forms should be the same, so that CARB can most efficiently compile the data from the local air districts for transmittal to EPA to populate the RBLC.