

Yolo-Solano Air Quality Management District  
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Davis, CA 95618  
(530)757-3650  
[www.ysaqmd.org](http://www.ysaqmd.org)



## **PROPOSED AMENDMENTS TO RULE 2.43, BIOMASS BOILERS**

### **FINAL STAFF REPORT**

November 28, 2023

Prepared by Eden Winniford

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## I. EXECUTIVE SUMMARY

On December 13, 2023 the Yolo-Solano Air Quality Management District (District) Board of Directors will consider the proposed amendment to Rule 2.43, BIOMASS BOILERS. Rule 2.43 contains emission standards for biomass fired boilers. The amendment being proposed to Rule 2.43 is to require the owner/operator of any biomass boiler within the District to submit emissions records to the EPA at a minimum of every six months.

The proposed amendment will not have a significant or detrimental effect on the environment. Therefore, staff prepared a Notice of Exemption to satisfy the requirements of the California Environmental Quality Act (CEQA). The notice states that the revisions to Rule 2.43 are exempt from the requirements of CEQA pursuant to Section 15308, Actions by Regulatory Agencies for Protection of the Environment.

### A. BACKGROUND

#### History

Rule 2.43 Biomass Boilers was originally adopted by the District on November 10, 2010. This version of the Rule was submitted for State Implementation Plan (SIP) approval in 2011 and was approved into the SIP in 2012. The rule was originally adopted to satisfy a requirement in our Reasonably Available Control Technology State Implementation Plan (RACT SIP) from 2006. The RACT SIP requires that we must have a Rule for all major non Control Technique Guideline (CTG) sources.

In July of 2023 the District was notified by EPA Region 9 that they couldn't approve our 2008 RACT SIP because of EPA's recent disapproval of a Colorado SIP due to insufficient reporting requirements. The Colorado SIP required sources to report by request only, which EPA believes is not sufficient under the Clean Air Act since it limits the public's ability to participate in enforcement. Our existing rule required owners/operators to retain emissions records and submit them to the District upon request. EPA Region 9 requested that we amend Rule 2.43 to require reporting to our agency every 6 months. Due to the potentially large volume, our District does not want those records submitted to us every 6 months, so we proposed an alternative – to have the facility submit the records to EPA every 6 months.

#### Overview of source category

This rule applies to biomass fired boilers, of which our District only has 1 permitted source (Woodland Biomass Power Ltd).

## II. DISCUSSION OF PROPOSED RULE 2.43 AMENDMENTS

The proposed amendments to Rule 2.43 are to add 2 new sections, as follows:

### **Section 503**

**SOURCE TEST REPORTS:** The owner/operator of an affected unit shall maintain the results of any RATA performed under section 304.

**Section 504**

FEDERAL REPORTING: At least every six (6) months, the owner/operator of an affected unit shall submit all records required by this rule to the U.S. EPA via the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through U.S. EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov>), or analogous electronic submission system provided by U.S. EPA.

There will be no emissions reductions from this rule amendment.

**III. COMPARISON WITH OTHER APPLICABLE REGULATIONS AND REQUIREMENTS**

California Health and Safety Code (CH&SC) Section 40727.2 requires districts to perform a comparative alternative analysis of any new control standard. Specifically, the District is required to prepare a written analysis (usually in the form of a matrix) that identifies all existing federal air pollution control requirements, including, but not limited to emission control standards constituting best available control technology (BACT) that applies to the same equipment or source type as the rule or regulation proposed for adoption or modification by the District. In addition, the analysis shall identify any other District rule or regulation that applies to the same equipment or source type. However, as discussed above, since prior amendments to this rule were required to meet RACT guidelines, a RACT determination was made in place of a BACT analysis. The District has determined that the rule meets RACT guidelines. This amendment is administrative in nature, so the specified elements (e.g., averaging provisions, operating parameters, monitoring, etc....) are not applicable.

**IV. IMPACTS OF THE PROPOSED RULE**Emissions Impacts

This is an administrative amendment and does not have a direct impact on emissions.

Cost Effectiveness

CH&SC Section 40703 requires the District, in the process of the adoption of any rule or regulation, to consider and make public its findings related to the cost effectiveness of the rule. Cost effectiveness for rulemaking purposes is calculated by dividing the cost of air pollution controls required by the rule by the amount of air pollution reduced. The amendment to this Rule will not impact emissions and therefore cost effectiveness calculations cannot be performed.

Socioeconomic Impacts

California Health and Safety Code Section 40728.5(a) requires the District, in the process of the adoption of any rule or regulation, to consider the socioeconomic impact if air quality or emission limits may be significantly affected. However, districts with a population of less than 500,000 persons are exempt from the provisions of Section 40728.5(a). The District's population is estimated to be approximately 345,000 and well below the 500,000-person threshold. Therefore, a socioeconomic analysis for this rulemaking is not required.

Incremental Cost Effectiveness

CH&SC Section 40920.6 requires an assessment of the incremental cost-effectiveness for proposed regulations relative to ozone, Carbon Monoxide (CO), Sulfur Oxides (SOx), Nitrogen Oxides (NOx), and their precursors. Incremental cost-effectiveness is defined as the difference in control costs divided by the difference in emission reductions between two potential control options that can achieve the same emission reduction goal of a regulation. Again, the District does not expect any emissions changes from this administrative amendment, so no incremental cost-effectiveness analysis can be done.

## **V. ENVIRONMENTAL IMPACTS OF METHODS OF COMPLIANCE**

California Public Resource Code Section 21159 requires the District to perform an environmental analysis of the reasonably foreseeable methods of compliance. The analysis must include the following information:

1. An analysis of the reasonably foreseeable environmental impacts of the methods of compliance.
2. An analysis of the reasonably foreseeable mitigation measures.
3. An analysis of the reasonably foreseeable alternative means of compliance with the rule or regulation.

This is an administrative amendment and does not have a direct impact on emissions. Therefore, an evaluation under this Section cannot be performed.

The proposed rule amendment will not have a significant effect on the environment and is considered to be an action taken to maintain and protect the environment. Therefore, staff has determined that the project is categorically exempt from the requirements of the California Environmental Quality Act (CEQA) pursuant to Section 15308, Actions by Regulatory Agencies for Protection of the Environment. Staff prepared a Notice of Exemption (NOE) to meet the CEQA Guidelines (Attachment B).

## **VI. REGULATORY FINDINGS**

Section 40727(a) of the California Health & Safety Code (H&SC) requires that prior to adopting or amending a rule or regulation, an air district's board make findings of necessity, authority, clarity, consistency, non-duplication and reference. The findings must be based on the following:

1. Information presented in the District's written analysis, prepared pursuant to H&SC Section 40727.2;
2. Information contained in the rulemaking records pursuant to H&SC Section 40728; and
3. Relevant information presented at the Board's hearing for adoption of the rule.

The required findings are:

Necessity: The rule amendment is necessary in order to satisfy EPA's requirements for our RACT SIP.

Authority: The District is authorized to adopt rules and regulations by California Health and Safety Code, Sections 40001, 40702, 40716, 41010 and 41013. [H&SC Section 40727 (b)(2)]

Clarity: The proposed rule is written so that the meaning can be easily understood by the persons directly affected by it. In addition, the record contains no evidence that the persons directly affected by the rule cannot understand the rule. [H&SC Section 40727(b)(3)]

Consistency: The proposed rule does not conflict with and is not contradictory to, existing statutes, court decisions, or state or federal regulations. [H&SC Section 40727(b)(4)]

Non-Duplication: The proposed rule does not duplicate any state laws or regulations, regarding the attainment and maintenance of state and federal air quality limits. [H&SC Section 40727(b)(5)]

Reference: There are no other statutes, court decisions, or other provisions of law that the District implements, interprets, or makes specific by adopting, amending or repealing the rule. [H&SC Section 40727(b)(6)].

## **VII. PUBLIC COMMENTS AND STAFF RESPONSES**

Since the single amendment to this Rule is administrative in nature and will only impact one source, the District did not hold a public workshop. Staff discussed the proposed changes with the facility, and they will be able to comply with the reporting requirements.

Staff will hold a public hearing on December 13, 2023 to discuss the proposed amendment to Rule 2.43. Notification was sent to ARB, EPA, and the one affected source. The public hearing notice was published in the Woodland Democrat prior to the hearing.

A copy of the public hearing notice, the proposed staff report, and proposed rule language, were posted on the District's web page prior to the public hearing. No comments were received prior to the hearing.

## **VIII. REFERENCES**

EPA Plan Approval, Conditional Approval, Limited Approval, and Limited Disapproval; Serious Attainment Plan Elements and Related Revisions for the 2008 8-Hour Ozone Standard for the Denver Metro/North Front Range Nonattainment Area

**ATTACHMENT A**

**PROPOSED RULE 2.43, BIOMASS BOILERS  
STRIKE-OUT UNDERLINE VERSION**

## **RULE 2.43 BIOMASS BOILERS**

**ADOPTED** November 10, 2010

**AMENDED** April 12, 2023

**AMENDED** [December 13, 2023](#)

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Yolo-Solano AQMD

Amended [April 12, 2023](#)[December 13, 2023](#)

([Final draft language November 28, 2023](#))



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## 100 GENERAL

- 101 **PURPOSE:** The purpose of this rule is to limit the emissions of oxides of nitrogen(NOx) and carbon monoxide (CO) from biomass fueled boilers.
- 102 **APPLICABILITY:** The provisions of this rule are applicable to boilers and steam generators with rated heat inputs of greater than or equal to 5 million BTU per hour and which combust biomass as a fuel.
- 110 **EXEMPTIONS:** The provisions of this rule shall not apply to the following:
- 110.1 **Boilers, Steam Generators, and Process heaters:** Boilers, steam generators, and process heaters which are subject to the provisions of District Rule 2.27 - Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters.
  - 110.2 **Solid Waste Incinerators:** Combustion units whose primary purpose is to burn municipal solid waste.
  - 110.3 **Waste Heat Recovery Boilers:** Waste heat recovery boilers that are used to recover sensible heat from the exhaust of combustion turbines or unfired waste heat recovery boilers used to recover sensible heat from the exhaust of any combustion equipment.

## 200 DEFINITIONS

- 201 **BIOMASS:** Any organic material not derived from fossil fuels, such as agricultural crop residues, bark, lawn, yard and garden clippings, leaves, silvicultural residue, tree and brush pruning, wood and wood chips, and wood waste, including these materials when separated from other waste streams. Biomass does not include material containing sewage sludge, industrial sludge, medical waste, hazardous waste, or radioactive waste.
- 202 **BIOMASS FUELED BOILER (BOILER):** Any combustion equipment designed to burn biomass to produce steam, heat water or other fluids, and/or produce electricity, including but not limited to boilers and steam generators.
- 203 **BLOCK 24-HOUR AVERAGE:** the arithmetic average of the hourly NOx or CO emission rates of a unit as measured over 24 one-hour periods, daily, from 12:00 AM to 11:59 PM, excluding periods of system calibration.

- 204 BRITISH THERMAL UNIT (BTU): The amount of heat required to raise the temperature of one pound of water from 59 degrees Fahrenheit to 60 degrees Fahrenheit at one atmosphere.
- 205 CARBON MONOXIDE (CO) EMISSIONS: Carbon monoxide in the flue gas.
- 206 CURING STARTUP: A startup which includes heating the boiler at a predetermined rate and holding the temperature at several points to allow for insulating materials to cure in the boiler refractory.
- 207 HEAT INPUT: The chemical heat released due to fuel combustion in a unit, using the higher heating value of the fuel. This does not include the sensible heat of incoming combustion air.
- 208 HIGHER HEATING VALUE (HHV): The total heat liberated per mass of fuel burned (BTU per pound), when fuel and dry air at standard conditions undergo complete combustion and all resultant products are brought to their standard states at standard conditions.
- 209 NITROGEN OXIDE (NO<sub>x</sub>) EMISSIONS: The sum of nitric oxides and nitrogen dioxide in the flue gas, collectively expressed as nitrogen dioxide (NO<sub>2</sub>).
- 210 RATED HEAT INPUT: The heat input capacity, in million BTU per hour, specified on the nameplate of the unit. If the unit has been altered or modified such that the maximum heat input is different than the heat input capacity specified on the nameplate, the maximum heat input shall be considered as the rated heat input.
- 211 SHUTDOWN: The period of time when fuel feed is curtailed and the unit cools down from its normal operating temperature, to an ambient temperature.
- 212 STARTUP: The period of time that a unit is heated to the normal operating temperature, from a shutdown status.
- 213 **UNIT:** Any biomass fueled boiler, as defined in section 202.

### 300 STANDARDS

- 301 **EMISSION LIMITS:** The owner/operator of an affected unit shall limit the emissions of that unit to less than the following, excluding startup/shutdown:

NOx	CO
90 ppm, corrected to 3% O2 (block 24 hour average)	400 ppm, corrected to 3% O2 (block 24 hour average)

302 **STARTUP/SHUTDOWN PROVISIONS:** The emission limits of section 301 shall not apply during startup/shutdown, provided the following requirements are met:

302.1 A normal startup shall not exceed 24 hours in duration. A curing startup shall not exceed 96 hours in duration.

302.2 A shutdown shall not exceed 24 hours.

302.3 The frequency and duration of startup/shutdown periods and their associated emissions shall be minimized as much as technologically feasible.

302.4 During startup/shutdown periods, the owner/operator of an affected unit shall limit the emissions of that unit to less than the following:

NOx	CO
215 ppm, corrected to 3% O2 (block 24 hour average)	400 ppm, corrected to 3% O2 (block 24 hour average)

303 **CONTINUOUS EMISSION MONITORING SYSTEM (CEMS):** The owner/operator of an affected unit shall install, calibrate, maintain, and operate a Continuous Emission Monitoring System (CEMS) for measuring NOx and CO emission concentrations.

303.1 The CEMS shall comply with the requirements specified in 40 Code of Federal Regulations (CFR) Part 60, Appendix B, Specification 2 and Appendix F or other alternative methods approved by the U.S. EPA and the District.

304 **SOURCE TESTING:** The owner/operator of an affected unit subject to the provisions of this rule shall perform a Relative Accuracy Test Audit (RATA) to verify compliance with 40 CFR Part 60, Appendix F at least once every four (4) calendar quarters, in accordance with a District-approved protocol and the procedures listed in Appendix F.

#### 400 ADMINISTRATIVE REQUIREMENTS

Yolo-Solano AQMD

Amended [April 12, 2023](#) [December 13, 2023](#)  
([Final draft language November 28, 2023](#))

401 **COMPLIANCE SCHEDULE:** The owner/operator of an affected unit subject to the requirements of this rule shall demonstrate full compliance with all provisions by July 1, 2011.

402 **CEMS OPERATING AND MAINTENANCE (O&M) PLAN:** The owner/operator of an affected unit shall submit an O&M Plan for the CEMS to the Air Pollution Control Officer (APCO) for approval. The plan shall include:

402.1 The procedures for collecting and recording required data and other information in a form approved by the APCO.

402.2 The procedures and schedules for preventive and corrective maintenance performed for the purpose of maintaining the CEMS in proper operating condition.

## 500 REPORTING AND RECORDKEEPING

501 **REPORTING:** All records required by this Rule shall be maintained on-site for a period of five (5) years and made available to the APCO upon request.

502 **RECORDKEEPING:** The owner/operator of an affected unit shall maintain an operating log for the unit that includes, on a daily basis:

502.1 The actual startup/shutdown time and total operating hours;

502.2. Type and amount of each biomass fuel burned;

502.3 The exhaust gas CO and NO<sub>x</sub> concentrations in parts per million volume (ppmv), corrected to 3% O<sub>2</sub>, for block 24-hour average.

503 **SOURCE TEST REPORTS:** The owner/operator of an affected unit shall maintain the results of any RATA performed under section 304.

504 **FEDERAL REPORTING:** At least every six (6) months, the owner/operator of an affected unit shall submit all records required by this rule to the U.S. EPA via the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through U.S. EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov>), or analogous electronic submission system provided by U.S. EPA.

## 600 TEST METHODS

- 601 GENERAL: For the purposes of this Rule, the following test methods (or their most recent approved versions) shall be used. Other alternative test methods that are approved in writing by the District and the EPA may also be used.
- 602 NO<sub>x</sub> EMISSION CONCENTRATION: NO<sub>x</sub> emission concentrations shall be determined in accordance with U.S. EPA Method 7.
- 603 CO EMISSION CONCENTRATION: CO emission concentrations shall be determined in accordance with U.S. EPA Method 10.
- 604 STACK GAS OXYGEN: The oxygen content of the stack gas shall be determined in accordance with U.S. EPA Method 3.
- 605 STACK GAS VELOCITY (FLOW): Velocity of the stack gases shall be determined in accordance with U.S. EPA Method 2.
- 606 STACK GAS MOISTURE CONTENT: Moisture content of the stack gases shall be determined in accordance with U.S. EPA Method 4.
- 607 FUEL HHV: The HHV of solid fuels shall be determined in accordance with ASTM E 711-87 or ASTM D 2015-96.

**ATTACHMENT B**

**NOTICE OF EXEMPTION FROM CEQA GUIDELINES**

**Notice of Exemption**

**To:**  Office of Planning and Research  
(submitted electronically at <https://ceqasubmit.opr.ca.gov/>)  
1400 Tenth Street, Room 121  
Sacramento, CA 95824

County Clerk  
County of Yolo  
625 Court Street Room 105  
Woodland, CA 95695

County Clerk  
Solano County  
600 Texas Street  
Fairfield, CA 94533

**From:** Yolo-Solano Air Quality Management District  
1947 Galileo Court, Suite 103  
Davis, CA 95618

**Project Title:** Revision of Rule 2.43 – BIOMASS BOILERS

**Project Location:** Yolo-Solano Air Quality Management District

**Project Description:** The District is proposing to amend Rule 2.43, BIOMASS BOILERS to require the owners/operators of biomass boilers to submit emissions records to the U.S. EPA at a minimum of every six months.

**Name of Public Agency Approving Project:** Yolo-Solano Air Quality Management District

**Name of Person or Agency Carrying Out Project:** Yolo-Solano Air Quality Management District

Exempt Status:

- Ministerial
- Emergency Project
- Categorical Exemption (CEQA Guidelines Section 15308, Action by Regulatory Agency for Protection of the Environment)
- Statutory Exemption

**Reason why project is exempt:** The revision of Rule 2.43 is an action to increase the frequency of emission reporting to increase accountability and protect the environment and is therefore exempt from CEQA because it constitutes a Class 8 categorical exemption pursuant to CEQA Guidelines 15308.

**Lead Agency Contact Person:** Gretchen Bennett, Air Pollution Control Officer

**Telephone Number:** (530) 757-3650

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_ **Title:** \_\_\_\_\_



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**Lead Agency Contact Person:**            Gretchen Bennett, Air Pollution Control Officer

**Telephone Number:**                        (530) 757-3650

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_ **Title:** \_\_\_\_\_

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**Lead Agency Contact Person:** Gretchen Bennitt, Air Pollution Control Officer

**Telephone Number:** (530) 757-3650

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_ **Title:** \_\_\_\_\_

**ATTACHMENT C**  
**RESOLUTION NO. 23-14**

## RESOLUTION NO. 23-14

## RESOLUTION AMENDING YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT RULE 2.43

**WHEREAS**, California Health and Safety Code section 40702 provides that an air quality management district shall adopt rules and regulations as may be necessary or proper to execute the powers and duties granted to, and imposed upon, the district by Division 26 of the Health and Safety Code; and

**WHEREAS**, Health and Safety Code section 40727 provides that before adopting, amending, or repealing a rule or regulation, a district board shall make findings of necessity, authority, clarity, consistency, non-duplication, and reference, based upon information developed pursuant to section 40727.2, information in the rulemaking record maintained pursuant to section 40728, and relevant information presented at the public hearing required by section 40725; and

**WHEREAS**, Section 15308 of the CEQA Guidelines provides that actions taken by regulatory agencies as authorized by state law to assure the maintenance, restoration, or enhancement of the environment where the regulatory process involves procedures for the protection of the environment, are categorically exempt from CEQA review (Class 8 Categorical Exemption); and

**WHEREAS**, Yolo-Solano Air Quality Management District staff identified requirements within Rule 2.43, Biomass Boilers, which required updating for consistency with federal policy.

**NOW, THEREFORE, BE IT RESOLVED** that the Board of Directors of the Yolo-Solano Air Quality Management District hereby finds, authorizes, directs, and declares as follows:

1. The Board of Directors has considered and hereby adopts by reference the staff report prepared in this matter.
2. The Board of Directors makes the following findings pursuant to Health and Safety Code section 40727:
  - a. Necessity: Information in the District's rulemaking record maintained pursuant to Health and Safety Code section 40728 demonstrates a need for amending District Rule 2.43; and
  - b. Authority: Health and Safety Code section 40702 permits the District to amend District Rule 2.43; and
  - c. Clarity: District Rule 2.43 as amended is written so that its meaning can be easily understood by the persons directly affected by it; and

- d. Consistency: District Rule 2.43 as amended is in harmony with, and not in conflict with or contradictory to, existing statutes, court decisions, or state or federal regulations; and
  - e. Non-Duplication: District Rule 2.43 as amended does not impose the same requirements as an existing state or federal regulation; and
  - f. Reference: There are no other statutes, court decisions, or other provisions of law that the District implements, interprets, or makes specific by adopting, amending or repealing the rule.
3. The Board of Directors finds that the District has complied with the procedural requirements set forth in Chapters 6 and 6.5 of Part 3 of Division 26 of the Health and Safety Code.
  4. The Board of Directors finds that amending District Rule 2.43 is an action taken by a regulatory agency as authorized by state law to assure the maintenance, restoration, or enhancement of the environment where the regulatory process involves procedures for the protection of the environment, and is therefore categorically exempt from CEQA review as a Class 8 Categorical Exemption.
  5. The Board of Directors hereby amends District Rule 2.43, Biomass Boilers, as set forth in Exhibit 1 (Attachment A of the Staff Report), which is attached and incorporated by reference. The amendment shall become effective immediately upon adoption.

**PASSED AND ADOPTED** by the Board of Directors of the Yolo-Solano Air Quality Management District this 13th day of December 2023, by the following vote:

Ayes:

Noes:

Absent:

Abstain:

---

Gloria Partida, Chair Board of Directors  
Yolo-Solano Air Quality Management District

Attest:

Approved as to Form:

---

Denise Almaguer, Board Clerk

---

Hope P. Welton, District Counsel

**ATTACHMENT D**  
**WRITTEN COMMENTS RECEIVED**

From: Lakin, Matt (he/him/his) <Lakin.Matthew@epa.gov>  
Sent: Wednesday, July 26, 2023 8:06 AM  
To: Gretchen Bennett <GBennett@ysaqmd.org>; Paul Hensleigh <PHensleigh@ysaqmd.org>  
Cc: Bauer, Meredith (she/her/hers) <Bauer.Meredith@epa.gov>; Beckham, Lisa (she/her/hers) <BECKHAM.LISA@EPA.GOV>; Lueders, Jesse (he/him/his) <Lueders.Jesse@epa.gov>; Chen, Eugene <Chen.Eugene@epa.gov>  
Subject: RACT SIP and Rule 2.43 Biomass Boiler Amendment

Hi Gretchen,

As you may know, we are currently reviewing the Yolo-Solano Rule 2.43 (Biomass Boilers) amendments that the District made to establish numeric limits that apply during periods of startup and shutdown. We wanted to make you aware of an emerging national issue regarding reporting requirements in State Implementation Plan rules, and how it affects the Rule 2.43 amendments. On May 9, 2023, the EPA took final action to disapprove portions of the state of Colorado's 2008 RACT SIP. As a quick summary, the basis for the disapproval action was that reporting requirements that only required sources to provide records upon request by the State/District, and not on a periodic basis, did not ensure enforceability of rule requirements. A more detailed explanation can be found in the response to comments document (comment and response #40) of the final action on the Colorado RACT SIP.

We'd like to schedule a meeting to have a discussion of this issue with you and your staff, because I understand that this issue may be a surprise and frustrating. If you could let us know who to invite and provide some available dates and times over the next couple of weeks, we can send out a calendar invite. Eugene Chen is our lead for this. I'm helping out because it's an emerging national issue with legal vulnerability, plus we have a rapidly approaching court-ordered deadline of March 31, 2024 to promulgate a FIP if we don't fully approve your rule.

Thanks,  
Matt

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