

**COMPARATIVE ANALYSIS OF
PROPOSED AMENDED NEW SOURCE REVIEW RULES 20.1, 20.2, 20.3 and 20.4,
EMISSION REDUCTION CREDIT RULE 26.0, AND TITLE V RULE 1415**

Introduction

Prior to adopting, amending, or repealing a rule or regulation, California Health and Safety Code Section 40727 requires findings of necessity, authority, clarity, consistency, non-duplication, and reference, as defined therein. Furthermore, as part of the consistency finding and to ensure proposed rule requirements do not conflict with or contradict other Air Pollution Control District (District) or federal regulations, Health and Safety Code Section 40727.2(a) requires the District to perform a written analysis identifying and comparing the air pollution control standards and other provisions of proposed amended Rules 20.1, 20.2, 20.3, 20.4, 26.0 and 1415 with other existing or proposed District rules and guidelines, and with existing State and federal rules, requirements, and guidelines applying to the same categories of emission sources.

Analysis

Pursuant to Health and Safety Code 40727.2(g), if the proposed amended rule "...does not impose a new emission limit or standard, make an existing limit or standard more stringent, or impose new or more stringent monitoring, recordkeeping, or recording requirements...", compliance with subdivision (a) is achieved by making a finding that the proposed amended rule falls within one of these categories.

None of the proposed amendments to Rules 20.1, 20.2, 20.3, 20.4, 26.0 or 1415 impose new limits or standards, make an existing limit or standard more stringent, or impose new or more stringent monitoring, recordkeeping or reporting requirements. Fixing the EPA-identified deficiencies and adding in the other ozone non-attainment classification thresholds and requirements simply incorporate existing federal requirements into the District rules. E-noticing is only an additional method of notifying the public about proposed permitting and emission reduction credit projects and does not change the underlying requirements for conducting a notice. Changing from a specified interpollutant offset ratio to requiring the ratio to be determined on a case-by-case basis does not affect the amount of offsets required by the rules, which remain unchanged.

Therefore, with the finding that the proposed amendments to Rules 20.1, 20.2, 20.3, 20.4, 26.0 and 1415 do not impose new or more stringent emission limits or standards, or monitoring, recordkeeping or reporting requirements, the comparative analysis requirement is satisfied.