

DOCKETED

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Appendix 5.1H Mitigation and Offsets

Offset Listing-Mitigation Strategy

The Ventura County APCD maintains a listing of its current ERC bank for public review and inspection. The ERC bank listing can be obtained from the AQMD's website, and is not included herein. The MREC project, pursuant to the AQMD NSR rule is required to purchase or acquire sufficient emission reduction credits to offset the proposed project emissions due to its proposed status as a major NSR source for NO_x. The NSR rule required amounts of ERCs are delineated in Table 5.1H-1, where the emissions listed are based on the first year of operation (potential to emit).

Table 5.1H-1 VCAPCD Emission Bank Credits Required By MREC

	PM10/2.5	ROC	NO _x	SO ₂	CO
VCAPCD Offset Trigger Thresholds, tpy	15	5	5	15	NA
Facility PTE1, tpy	12.52	4.98	28.17	1.351	32.32
VCAPCD Offset Ratio	1:1	1.3:1	1.3:1	1:1	1:1
Total Offsets Required, tpy	0	0	30.12	0	0

1 Values derived from Section 5.1.

MREC Proposed Mitigation Program

The proposed mitigation strategy for MREC is being submitted as a confidential filing under separate cover. This strategy will be finalized and approved by the VCAPCD prior to the issuance of the authority to construct for the proposed project.

The project Applicant will provide all necessary documentation to show control or ownership of the required emissions offsets prior to issuance of the facility Permit to Operate by the VCAPCD per AQMD Rule 26.2. Offsets must be acquired from the District bank. Rule 26.2 does not indicate that offsets from other sources such as shutdowns, or non-traditional sources of emissions reductions credits are acceptable. In addition, Rule 26.2 does not seem to allow the use of inter-pollutant offsets, or offsets obtained from neighboring air districts within the same air basin.

The applicant is proposing to mitigate the increases in NO_x through the purchase of banked ERCs, per the VCAPCD rules and regulations.

The applicant will work with the VCAPCD and CEC to implement a mitigation strategy that complies with all applicable rules and regulations.