

Proposed Updates to BACT Guidelines

BACT Scientific Review Committee October 26, 2017

Background

- Updated BACT Guidelines and established Charter for BACT SRC at December 2016 Board meeting
- Board directed staff to continue work on updating BACT Guidelines, reviewing BACT determinations done by other air districts with an emphasis on UV/EB inks and coatings technology and report back to Stationary Source Committee by June 2017 on proposed updates
- Held two public BACT SRC meetings, April 4 & May 24, 2017 with 30-Day Comment period

Proposed Updates to BACT Guidelines

- Parts B and D (major & minor source BACT)
- Reviewed achieved in practice BACT for UV/EB and water-based inks and coatings, Food Ovens, Engines and other equipment categories
- Reviewed BACT determinations from SCAQMD Engineering & Permitting and other Air Districts
- Conducted site visits to facilities (Printing, Food Oven, APC mfg.) and worked with printing industry trade organizations.
- Maintain consistency with recent changes to SCAQMD rules, State and Federal requirements
- Make BACT webpage interactive and User Friendly



Part B, Section I, SCAQMD LAER/BACT

New Listings

Furnace (Heat Treating Alumin	um ≤900°F) ^{5MMBtu/hr,} Low NOx burner, NOx=30ppm	
Food Oven- Bakery	Four ovens: 3.2, 2.8, 3.2 & 5.4MMBtu/hr vented to 4MMBtu/hr CatOx @ 95% control & ≥600°F inlet temp & ceramic pre filter, R1147 compliant, Ovens - R1153.1 compliant	
Food Oven- Tortilla Cl	hip 5.774MMBtu/hr, IR & Ribbon burners, NOx=54ppm @ 1 hr. avg., CO=2000ppm, @ 15 min. avg.	
Food Oven- Snack Fo	od 1.6MMBtu/hr, Maxon Low NOx burner, NOx=25ppm, CO=75ppm, both @ 1 hr. avg. 3% O ₂	
Flare- Biogas 39.3MM	Btu/hr, Bekaert, NOx=0.025 lb/MMBtu, CO=0.06 & VOC=0.038 /IBtu/hr, John Zink, ZULE, NOx=0.025 lb/MMBtu, CO=0.06, 5.5 lb/day, PM=14.2 lb PM10/hr	
Flare- Landfill Gas	120MMBtu/hr, Zink ultra Low NOx, NOx=0.025 lb/MMBtu, CO=0.06; VOC=1.33 lb/hr, PM=1.4 lb/hr & SOx=2.5 lb/hr	

Part B, Section I, SCAQMD LAER/BACT

Listing Updates

Boilers

39.9 MMBtu/hr, Low NOx burner, SCR & anhydrous NH₃. NOx=5ppm, CO=100ppm & NH₃=5ppm



I.C. Engine – Digester Gas-Fired

Compliance with Rule 1110.2(d)(1)(C); NOx=11ppm, VOC=30ppm & CO=250ppm



Part B, Section III, Other Technologies

Emerging Technologies

I.C. Engine- Emergency Compression Ignition with PM Trap and SCR Equipped with SCR & DPF certified to meet EPA Tier 4 emission limits: NMHC=0.14 g/bhp-hr, NOx=0.5 g/bhp-hr, CO=2.61 and PM=0.022 g/bhp-hr

Distributed Generation Fuel Cell with digester gas clean up system Equipped with 2.5 MMBtu/hr heater fired on digester gas used for start up, cool down and low power operation. Rule 222 limited ≤90,000 therms/yr. NOx=0.07, VOC=CO=0.10 lb/MW-hr



- These are emerging technologies which have been in operation with an air quality permit, however do not yet qualify as LAER
- Proposed new section in BACT Determination form titled "7. Pending Considerations"



New Listings

Printing (Graphic Arts) Flexographic

Inks with ≤1.5 lb VOC/gal, Less Water and Exempt Compounds; <u>or UV/EB or water-based</u> <u>inks/coatings ≤180 g VOC/L.</u> Compliance with SCAQMD Rules 1130 and 1171.

Printing (Graphic Arts) Flexographic

Add-on control venting to Regenerative Thermal Oxidizer, 95% destruction eff. and ≥1500°F operating temp with total enclosure. *{cost effectiveness}*

Printing (Graphic Arts) Lithographic or Offset, Heatset

Low VOC Fountain Solution ($\leq 8\%$ by Vol. VOC); Low Vapor Pressure (≤ 10 mm Hg VOC Composite Partial Pressure¹)) or Low VOC (≤ 100 g/l) Blanket and Roller Washes; Oil-Based or UV-Curable Inks; and Compliance with SCAQMD Rules 1130 and 1171 (7-14-2006).

Printing (Graphic Arts) Lithographic or Offset, Heatset

Add-on control venting to Regenerative Thermal Oxidizer, 99% overall control and ≥1595°F operating temp. {*cost effectiveness*}



New Listings

Printing (Graphic Arts) Screen Printing and Drying

Compliance with SCAQMD Rules 1130.1 and 1171; or use of Rule 1130,1 compliant UV/EB or water-based inks/coatings.



New Listings

Food Oven		
	>500°F: NOx = 60 ppm, CO= Rule 407/1153.1, PM10=SOx= Nat	Gas
– Ribbon burner	≤500°F: NOx = 30ppm CO = Rule 407/1153.1, PM10=SOx= Nat Gas	
– Direct fired	NOx = 30 ppm, CO=Rule 407/1153.1, PM10=SOx= Nat Gas	
- Infrared	NOx = 30 ppm, CO=Rule 407/1153.1, PM10=SOx= Nat Gas	
– Other	Compliance with Rule 1147/1153.1, PM10=SOx= Nat Gas	
 Bakery Oven with Yeast Leavened Produc 	CatOx @ 95% overall control, ≥600°F inlet temp & ceramic pre filter {cost effectiveness}	

≥30 lb VOC/day



New Listing/Updates

I.C. Engine, Stationary, Non-Emergency, Electrical Generators	Compliance with Rule 1110.2	
I.C. Engine, Stationary, Non-Emergency	Delete listing. Being replaced by BACT determinations I.C. Engine, Stationary, Non-Emergency, Electrical and Non- Electrical Generators	
I.C. Engine, Stationary, Non-Emergency, Non- Electrical Generators	Delete footnote #1 consistent with proposed listing of new BACT determination for "I.C. Engine, Stationary, Non- Emergency, Electrical Generator"	
I.C. Engine, Portable	75≤ HP <175, Tier 4 Final – Consistent with CARB	
Dryer or Oven	Footnote of non-applicability to food oven	



Addition of omitted text

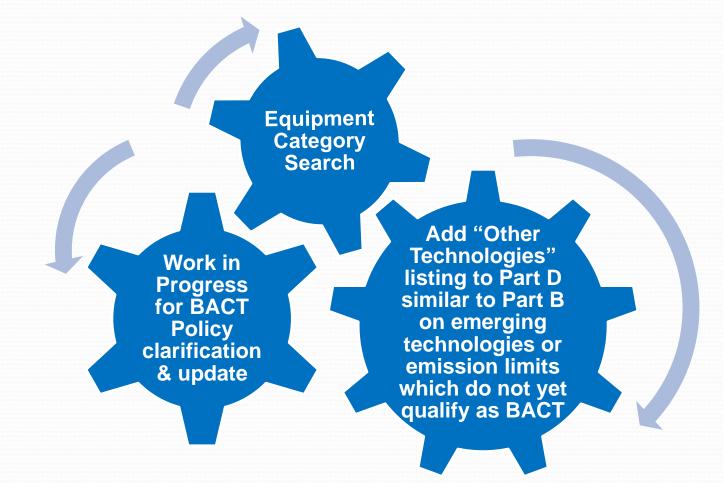
Equipment Not Identified in the MSBACT Guidelines



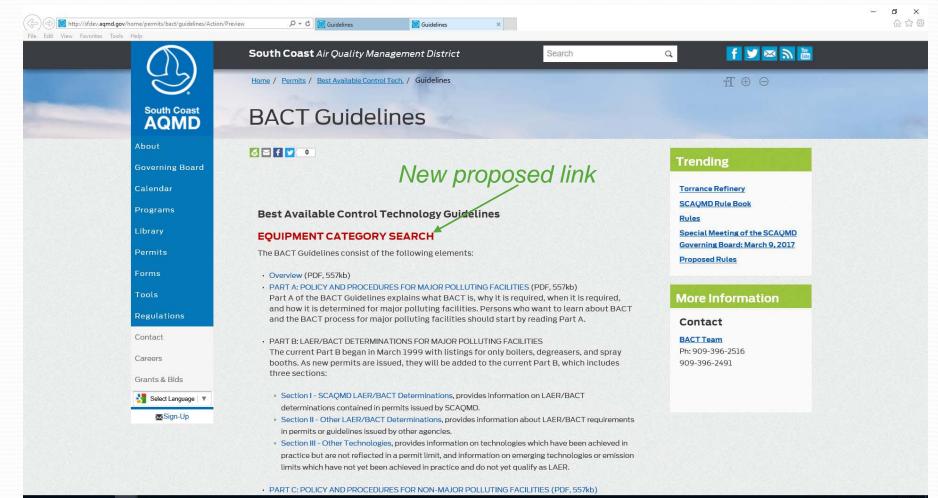
Although the BACT Guidelines contains an extensive listing of practically everything the SCAQMD permits, occasionally applications will be received for equipment not identified in the Guidelines. As required by Rule 1303, MSBACT for equipment category not listed in the MSBACT Guidelines must be determined on a case-by-case basis using the definition of BACT in Rule 1302 and the general procedures in these MSBACT Guidelines, as shown in Chapter 1 and the previous sections of this chapter.

Applicants whose equipment is not listed in Part D of the MSBACT Guidelines should contact the SCAQMD and arrange a pre-application conference. MSBACT issues can be discussed in the conference for leading to a MSBACT determination. Applicants are not required to conduct the MSBACT evaluation but the application may be processed more quickly if the applicant provides a MSBACT evaluation with the application for a permit to construct.

Making BACT Guidelines User Friendly



Equipment Category Search





EQUIPMENT CATEGORIES

A B C D E F G H I J K L M N O P Q R S T U V W X Y Z

Index of Equipment Categories

Α

Abrasive Blasting Room

Absorption Chiller

Air Start Unit

Air Stripper – Ground Water Treatment

Aluminum Meting Furnace

Ammonium Bisulfate and Thiosulfate Production

Asbestos Machining Equipment

Asphalt Batch Plant

Asphaltic Day Tanker

Auto Body Shredder

EQUIPMENT CATEGORIES

A B C D E F G H I J K L M N O P Q R S T U V W X Y Z

Index of Equipment Categories

Abrasive Blasting Room

Part D- Minor Source

1. Abrasive Blasting - Enclosed

Part B- Major Source - LAER

I. SCAQMD Listings

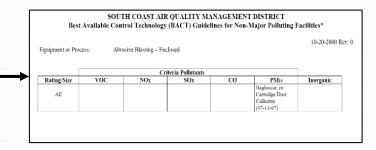
Abrasive Blasting Room, Rohr, Ind. A/N 391420 12/6/02

II. Other Districts

TBD

III. Other/Potential Technologies

TBD



Search



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Next Steps

- 30-day comment period
- Follow up BACT SRC meeting early Dec. 2017
- Stationary Source Committee meeting 1/19/18
- Governing Board Meeting 2/2/18