

# **PROPOSED AMENDED RULES 219 AND 222**

## **Stationary Source Committee**

**March 17, 2017**

### **Background**

- ▣ Rule 219 - Equipment Not Requiring a Written Permit Pursuant to Regulation II
  - Identifies exempt equipment
    - Low actual or potential to emit regulated air pollutants
    - Will not trigger Rule 1401 (toxics permitting)
    - Readily demonstrates compliance with SCAQMD rules
  - Includes multiple source categories of equipment
- ▣ Rule 222 - Filing Requirements For Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II
  - Provides an alternative to written permits
  - Equipment must be exempt per Rule 219

## Staff Proposal

- ▣ Proposed Amended Rule 219
  - New source categories exempt from permit
  - Existing source categories now subject to permit
  - Administrative changes
  - Other proposals by external stakeholders
- ▣ Proposed Amended Rule 222
  - Proposed new equipment to be added to filing program
  - Clarifications to existing source categories

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## Equipment Proposed to be Exempted from Written Permit

- ▣ Sub-slab ventilation systems at residences (c)(11)
- ▣ Equipment used to brew beer (<1 million gallons/year) (i)(13)
- ▣ Equipment used to manufacture dehydrated meat (VOC and PM non-combustion emissions < 1 lb/day) (i)(14)
- ▣ Storage of aqueous urea solutions\* (m)(24)

\* Will require registration under Rule 222

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## Equipment Proposed to be Exempted from Written Permit

- ☐ UV/EB equipment [(h)(1)(C), (l)(6)(B), (l)(11)(B)]
  - Using < 25 g/L materials and <25 g/L clean-up solvent and
  - Emitting < 1 tpy VOC
  - No registration

Category	Materials (VOC Content)	Clean-up Solvent (VOC Content)	Registration	VOC Emission Limit
Proposal for UV/EB (Other Technologies?)	25 g/L	25 g/L	No*	1 tpy
Other VOC Sources (Existing Rule with no changes)**	50 g/L	25 g/L	Yes	1 tpy
All VOC Sources, including UV/EB**	N/A	N/A	No	3 lb/day or 66 lb/mo (~ 0.5 tpy)

\* Considering submittal of Rule 109 to demonstrate less than 1 ton/year and VOC content

\*\* Pursuant to existing paragraphs (h)(1), (l)(6) or (l)(11)

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## Non-Permitted Equipment that Require Permit

- ☐ Non-emergency engines that provide prime power to a dwelling (c)(5)
- ☐ Equipment used to cut stainless steel or alloys containing toxic metals (e)(8)
- ☐ Blast cabinets with materials containing chrome or nickel (f)(2)
- ☐ Equipment for separation of plastics that cut, shred or grind; or emit odors (g)(4)
- ☐ Equipment for recycling expanded polystyrene (j)(4)
- ☐ Pavement stripers where supplemental heat is added (l)(9)

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## Non-Permitted Equipment that Require Permit *(Continued)*

- ▣ Groups of VOC containing liquid tanks mounted on a mobile platform (m)(9)
- ▣ Equipment for cleaning diesel particulate filters (o)(3)
- ▣ Heated surface preparation tanks and those containing lead (p)(4)
- ▣ Tanks containing Cr, or containing Ni, Pb or Cd that are heated or agitated (p)(4) & (p)(5)
- ▣ Equipment that is an integral part of permitted line, unless identified in associated permit to operate (s)(5)

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## Equipment Proposed to be Transitioned to Filing Program (Rule 222)

- ▣ Industrial cooling towers at chemical plants and refineries (currently exempt)
- ▣ Natural gas and crude oil production equipment
  - Information consistent with CARB's oil and gas regulation
  - Streamline registration process
- ▣ Storage tanks for aqueous urea solutions (previously required written permit)

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## Key Remaining Issues

- ▣ Allow PERP engines to be used as backup to permitted engine and in Outer Continental Shelf
  - PERP engines regulated by CARB and implementation of PERP regulations should be managed through the PERP program
- ▣ The 2006 permit exemption for UV/EB equipment should be reinstated (50 g/L for materials and cleanup)
  - Many UV/EB materials available that can meet 25 g/L
  - Staff proposal includes 25 g/L for cleanup solvents is consistent with conventional coating and printing operations
  - In lieu of the lower 25 g/L limit for UV/EB materials, no registration is required
    - ▣ Other convention coating and printing operations currently allowed 50 g/L for materials and registration is required

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## Key Remaining Issues

- ▣ Expand equipment proposed in Rule 222 filing program to include Rule 1147 equipment with emission profiles  $< 1 \text{ lb NO}_x/\text{day}$ 
  - Amendments to Rule 1147 will address equipment  $< 1 \text{ lb/day}$
  - Permits needed for equipment to establish conditions to ensure proper operation
- ▣ Allow replacement of guide pole floats with vapor socks on floating roof tanks
  - Modifications to emission control equipment requires engineering evaluation and is subject to permit modification requirements
  - Rule 1178 does not recognize vapor sock technology and Rule 463 does not include a trigger for incorporating vapor socks into an existing inspection plan

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## Rule Development Schedule

- ▣ Set Hearing April 7, 2017
- ▣ Public Hearing May 5, 2017

**Proposed Amended Rule 219 – Equipment Not Requiring a Written Permit Pursuant To Regulation II**

**Proposed Amended Rule 222 – Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant To Regulation II**

**BACKGROUND**

Rule 219 and 222 are linked rules that establish thresholds for emission sources not requiring a written permit from South Coast Air Quality Management District (SCAQMD). Equipment that emits any air contaminant not subject to a written permit under SCAQMD Regulation II is either exempt pursuant to Rule 219 or subject to a simplified filing process under Rule 222. Staff is proposing amendments to these rules to simplify and streamline the administration of the permit system.

**REPORT CONTENT**

<b>TOPIC</b>	<b>DESCRIPTION</b>
Proposal	<ul style="list-style-type: none"><li>• Exempt 4 new source categories of equipment from a written permit</li><li>• Limit exemptions and require permits for 10 source categories of equipment</li><li>• Transition 3 new source categories of equipment into Rule 222 filing program</li><li>• Additional minor or administrative changes to both Rule 219 and Rule 222</li></ul>
Requirements	<ul style="list-style-type: none"><li>• Exempt from written permit:<ul style="list-style-type: none"><li>- Sub-slab ventilation systems at residences</li><li>- Equipment used to brew beer for lower production facilities</li><li>- Equipment used to manufacture dehydrated meat</li><li>- Storage of aqueous urea solutions</li></ul></li><li>• Limit existing exemptions to require permits for<ul style="list-style-type: none"><li>- Non-emergency engines that provide prime power to a dwelling</li><li>- Equipment used to cut stainless steel or alloys containing toxic metals</li><li>- Equipment for separation of plastics that cut, shred or grind; or emit odors</li><li>- Equipment for recycling of expanded polystyrene</li><li>- Pavement stripers where supplemental heat is added</li><li>- Groups of VOC containing liquid tanks mounted on a mobile platform</li><li>- Equipment for cleaning diesel particulate filters</li><li>- Heated surface prep tanks and those containing lead</li><li>- Tanks containing Cr, or containing Ni, Pb or Cd that are heated or agitated</li><li>- Equipment that is an integral part of permitted line, unless identified in associated permit to operate</li></ul></li><li>• Transition to Rule 222 filing program:<ul style="list-style-type: none"><li>- Industrial cooling towers at chemical plants and refineries (currently exempt)</li><li>- Natural gas and crude oil production equipment (currently exempt)</li><li>- Storage tanks for aqueous urea solutions</li></ul></li></ul>
Schedule	<ul style="list-style-type: none"><li>• Public Hearing – May 5, 2017</li></ul>