

RULE 1147 TECHNOLOGY ASSESSMENT & PROPOSED AMENDMENTS TO RULE 1147



January 17, 2017

Rule 1147 Task Force Meeting

Agenda

- Welcome and Introductions
- Background
- Technology Assessment Update
- Proposed Amended Rule 1147
 - Technology Assessment Recommendations
 - Unit size determination (less than 1 lb/day)
 - Other proposed changes
- Future Activities and Schedule
- Discussion
- Contacts

Rule 1147 Background

- Adopted December 2008 – Miscellaneous Sources
- February 2016 SCAQMD released a Draft Technology Assessment on availability of low-NOx burner systems for small and low emissions sources (less than 1 pound/day)
- EO committed to independent 3rd party review of SCAQMD's Draft Technology Assessment
- May 2016, ETS, an independent air emissions control consulting firm was selected by a Proposal Review Panel that included:
 - SCAQMD, Ventura County APCD, Furnace Dynamics and California Small Business Alliance
- 2011 amendment approved into the SIP in December 2016

Recommendations from Draft Technology Assessment (February 2016)

1. Exempt some units with rated heat input less than 325,000 Btu per hour from Rule 1147 emission limits
2. Change the NO_x emission limit from 30 ppm to 60 ppm NO_x for the primary chamber for all burn-off ovens, burnout furnaces and incinerators
3. Delay compliance with NO_x emission limit for existing in-use heated process tanks, evaporators and parts washers until the combustion system or tank is modified, replaced or relocated
4. Delay compliance with the NO_x emission limit for existing in-use spray booths until the heating system is modified or replaced or the unit is relocated
5. Delay compliance with the NO_x emission limit for existing in-use units with actual NO_x emissions of one pound per day or less until the combustion system is modified or replaced or the unit is relocated

Summary of ETS Technology Review

- Agreed with all 5 staff recommendations
- Added a 6th recommendation to:
 - Change NO_x emission limit for afterburner processes operating at temperatures less than 800° F from 30 to 60 ppm **(Staff Agree)**

Summary of Comments at November 8th Task Force Meeting

- General agreement with many recommendations made by ETS and staff
- Questions on potential criteria for compliance delay or exemption from emission limit and impacts
 - In addition to the less than 325,000 Btu/hour threshold, explore ways to ascertain the 1 pound per day criteria (*was not a subject of ETS review*)
 - Why exempt less than 325,000 Btu/hour high temperature units as well as low temperature units?
- Questions on cost effectiveness methodology
- Recommend further examination of maintenance and compliance costs of different types of burners
- Concern with rule impacts on permit backlog
- Enhance outreach programs/guidelines for affected facilities

Staff will address these concerns during rulemaking

Proposed Changes to Rule

Preliminary Draft Rule Proposal

- Definitions
 - Combustion Modification
 - Add Infrared Burner Definition
 - Food Ovens and Rule 1153.1
- Emission limit changes in Table 1 consistent with Technology Assessment findings, ETS recommendations and comments
- July 1, 2017 compliance date nullified
 - Comply with limit upon combustion modification, replacement, relocation, rebuilding or age of 35 years
- Remove food ovens from Table 2 – Schedule

Preliminary Draft Rule (continued)

- Added monthly option and specific methods in section on criteria for compliance delay through recordkeeping (c)(6)(A-F)
 - 325,000 Btu/hour
 - Permit condition
 - Monthly with time or gas meter
 - Hourly limits for manual recordkeeping
 - Daily natural gas limit
 - Other options? (seeking input)

Preliminary Draft Rule (continued)

- Remove (c)(14) compliance options that are no longer applicable
- Clarify exemptions to address changes for:
 - Food ovens (move to 1153.1), heated tanks, evaporators and parts washers and flare based emission control systems
 - Future Rule 219 amendments
- Add testing exemption for direct fired infrared burners

Future Activities and Schedule

- Finalize Rule 1147 Technology Assessment with ETS recommendations (Publish on website)
- Update to Stationary Source Committee – January 20, 2017
- Release CEQA NOP – January 25, 2017
- Public Workshop and CEQA Scoping – February 15, 2017
- Continue Task Force Meetings
- Rule Amendment – 2nd Quarter 2017 (June)

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