PUBLIC WORKSHOP
PAR 219 AND PAR 222

March 2, 2017
SCAQMD Headquarters
Diamond Bar, CA

Agenda
- Background on Rules 219 and 222
- Rule Development Process
- Proposal
  - Proposed Amendments to Rule 219
    - New Exemptions
    - Changes to Existing Exemptions
  - Proposed Amendments to Rule 222
- Next Steps
- Schedule
- Public Comments
Rule 219 Background

- Rule 203 – Permit to Operate
  - All equipment “...which may cause the issuance of air contaminants...” required to obtain a permit to operate
  - Includes both basic and control equipment
  - Exceptions to this requirement contained in Rule 219
- Rule 219 - Equipment Not Requiring a Written Permit Pursuant to Regulation II
  - Adopted in 1976
    - Amended 18 times
    - Latest amendment in 2013
  - Identifies exempt equipment - generally, equipment with low actual or potential to emit regulated air pollutants
  - Previously exempted sources now required to obtain a permit are not subject to Rule 1401 if a permit application is submitted within one year

Rule 222 Background

- Rule 222 - Filing Requirements For Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II
- Purpose
  - “…provide an alternative to written permits.”
- Applicability
  - 22 emission source categories
- Eligibility
  - Exempt per Rule 219
  - Compliance with all applicable rules
- Adopted in 1998
  - Amended 4 times
  - Latest amendment in 2013
Rule Development Process
- Began Rulemaking in spring 2016
- Reviewed numerous requests for changes
  - 40+ from internal stakeholders
  - 18 requests from external stakeholders
- Several internal meetings with P&E and E&C staff
- Site visits and meetings
- Two working group meetings
  - August 2, 2016
  - November 10, 2016
- Public Workshop
- May 2017 Board Hearing

Staff Proposal
- Proposed Amended Rule (PAR) 219
  - Proposed new source category exemptions
  - Proposed changes to existing exemptions
  - Additional administrative changes
  - Proposals by external stakeholders
- PAR 222
  - Proposed new equipment to be added to filing program
  - Clarifications to existing source categories
### Description of Amendments

<table>
<thead>
<tr>
<th>Rule Citation</th>
<th>Source Category</th>
<th>Description of Amendment</th>
</tr>
</thead>
<tbody>
<tr>
<td>(b)(1)</td>
<td>Engines used at remote 2-way radio transmission towers</td>
<td>Add LPG and CNG as allowable fuels in addition to diesel</td>
</tr>
<tr>
<td>(b)(2)</td>
<td>Combustion equipment (food ovens)*</td>
<td>Minor clarification</td>
</tr>
<tr>
<td>(b)(5)</td>
<td>Fuel cells*</td>
<td>Clarification to restore original intent of exemption</td>
</tr>
<tr>
<td>(b)(6) and (r)(1)</td>
<td>PERP equipment</td>
<td>Consolidate all PERP language under paragraph (r)(1)</td>
</tr>
<tr>
<td>(c)(11)</td>
<td>Sub-slab ventilation systems</td>
<td>New source category for exemption</td>
</tr>
<tr>
<td>(d)(5)</td>
<td>Cooling towers*</td>
<td>Require industrial cooling towers to register under Rule 222</td>
</tr>
<tr>
<td>(e)(8)</td>
<td>Welding, oxy/gas fuel cutting, laser etching and engraving equipment excluding alloys containing chromium, cadmium, nickel, or lead</td>
<td>Exempt hand-held equipment. Establish low level for toxic impurities</td>
</tr>
<tr>
<td>(g)(2)</td>
<td>Shredding of wood products</td>
<td>Remove treated woods and greenwaste from exemption</td>
</tr>
</tbody>
</table>

*Requires registration under Rule 222

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### Description of Amendments (cont)

<table>
<thead>
<tr>
<th>Rule Citation</th>
<th>Source Category</th>
<th>Description of Amendment</th>
</tr>
</thead>
<tbody>
<tr>
<td>(g)(4)</td>
<td>Equipment for separation/segregation of plastic materials for recycling</td>
<td>New source category for exemption</td>
</tr>
<tr>
<td>(h)(1)(c), (l)(6)(b), (l)(11)(b)</td>
<td>Ultraviolet (UV) and electron beam coating and printing operations</td>
<td>Establish low concentration limits and total VOC emissions for UV/EB materials and clean-up solvents</td>
</tr>
<tr>
<td>(l)(8)</td>
<td>Coffee roasting equipment</td>
<td>Increase allowable size of coffee roasters</td>
</tr>
<tr>
<td>(l)(12)</td>
<td>Charbroilers, barbecue grills and other underfired grills</td>
<td>Minor clarification</td>
</tr>
<tr>
<td>(l)(13)</td>
<td>Equipment used to brew beer for lower production facilities</td>
<td>New source category for exemption</td>
</tr>
<tr>
<td>(l)(14)</td>
<td>Equipment used to manufacture dehydrated meat</td>
<td>New source category for exemption</td>
</tr>
<tr>
<td>(m)(9)</td>
<td>VOC-containing liquid storage and transfer</td>
<td>Clarification to prohibit circumvention of existing exemption language</td>
</tr>
<tr>
<td>(m)(24)</td>
<td>Storage of aqueous urea solutions*</td>
<td>New source category for exemption</td>
</tr>
</tbody>
</table>

*Requires registration under Rule 222
PAR 219 – Proposed New Source Categories for Exemption

- Sub-slab ventilation systems [(c)(11)]
  - Systems that meet low flow rate and low inlet TOC concentrations and have APC equipment
- Equipment for separation or segregation of plastic materials w/ no mechanical cutting and no odors [(g)(4)]
- Equipment used to brew beer [(i)(13)]
  - Less than 1,000,000 gallons of beer per calendar year
  - No boilers or silos included under exemption

PAR 219 – Proposed New Source Categories for Exemption (cont)

- Equipment used to manufacture dehydrated meat [(i)(14)]
  - Non-combustion VOC and PM emissions (including cleaning) 1 lb/day or less
  - Operating temperature is less than 190 degrees f
- Tanks for aqueous urea solutions [(m)(24)]
  - Capacity of 6,500 gallons or less
  - Exemption does not include tanks used for blending powdered urea and water
  - Requires filing under Rule 222
PAR 219 Proposed Additions or Modifications (cont)

- Engines at remote 2-way radio transmission towers [(b)(1)]
  - Allow CNG and LPG in addition to diesel #2
- Food ovens [(b)(2)]
  - All process emissions of VOC
  - No longer limited to VOC emissions from yeast fermentation
- Fuel cells [(b)(5)]
  - Establish allowable fuels (nat. gas, methanol, LPG)
  - Only fuel cells that use a combustion source for supplemental heat required to register

PAR 219 Proposed Additions or Modifications (cont)

- PERP equipment [(b)(8), (r)(1)]
  - (b)(8) will point to more inclusive language under (r)(1)
  - (r)(1) establishes appropriate MRR protocol for RECLAIM facilities
- Cooling towers [(d)(3)]
  - Industrial cooling towers at chemical facilities and refineries required to register under Rule 222
  - Comfort cooling towers still exempt without limitation
PAR 219 Proposed Additions or Modifications (cont)

- Welding, oxy-gas fuel cutting, laser cutting equipment [(e)(8)]
  - Add hand-held plasma-arc and laser cutting equipment to exemption
  - Limit exemption for cutting of stainless steel or alloys containing >0.1% by weight of Cr, Ni, Cd or Pb
  - Limit exemption for laser cutting, etching and engraving equipment rated >400 watts

- Wood products [(g)(2)]
  - Limit exemption by excluding painted wood or wood treated for exterior exposure
  - Limit exemption by excluding greenwaste

- UV/EB and UV/LED materials used in:
  - Printing & related coating and/or laminating [(h)(1)(C)]
  - Coating or adhesive application, or laminating [(l)(6)(B)]
  - Drying equipment [(l)(11)(B)]

- Exemption(s) applicable if:
  - All materials must have VOC content <25 g/l
  - All clean-up solvents must have VOC content <25 g/l
  - Total quantity of VOC emissions <1 ton/yr
  - Facility keeps records to demonstrate compliance
PAR 219 Proposed Additions or Modifications (cont)

- Coffee roasting equipment [(i)(8)]
  - Increase allowable size of coffee roasters from 10 lb/batch to 15 kg/batch
- Charbroilers [(i)(12)]
  - Remove limitation on charbroilers in multi-family residential units and make exemption general to any charbroiler or underfired grill used for non-commercial purposes
- Equipment for VOC containing liquid storage [(m)(9)]
  - Clarify rule language to prevent circumvention of intent by using multiple tanks

PAR 219 Proposed Additions or Modifications (cont)

- Natural gas and crude oil production equipment (to support Proposed CARB GHG Regulation)
  - Well heads and well pumps [(n)(1)]
  - Crude oil and natural gas pipeline transfer pumps [(n)(2)]
  - Gas, hydraulic or pneumatic repressurizing equipment [(n)(3)]
- Existing exemption continues to apply if facility submits a Rule 222 filing for:
  - Well heads and well pumps (currently required)
  - Natural gas pipeline transfer pumps
  - Repressurizing equipment
PAR 219 Proposed Additions or Modifications (cont)

- Equipment for surface preparation [(p)(4)]
  - Limit exemption for heated surface prep tanks under (p)(4)(F) and for tanks containing Pb
  - Limit exemption for all tanks containing chromium
  - Limit exemption for tanks that are rectified, sparged or heated and contain Ni, Pb or Cd

- Equipment for plating, stripping or anodizing of metals [(p)(5)]
  - Limit exemption for all tanks containing chromium
  - Limit exemption for tanks that are rectified, sparged or heated and contain Ni, Pb or Cd

- Paper shredding, carpet and paper shearing [(p)(10)]
  - Add fabric brushing and sueding to exemption
  - Limit exemption by excluding carpet and fabric recycling operations

- Exceptions to Exemptions [(s)(4), (s)(5)]
  - New exception for equipment subject to permitting under Regulation XIV
  - New exception for equipment that is an integral part of a series of permitted items, unless that equipment is already described on an SCAQMD permit
PAR 219 – Revisions to Existing Exemptions

- Equipment used in a dwelling [(c)(5)]
  - Limit exemption by excluding non-emergency ICEs used to provide prime power for a structure
- Tumblers for cleaning or deburring [(e)(14)]
  - Include control equipment under exemption
- Abrasive blasting cabinets [(f)(2)]
  - Limit exemption by excluding cabinets where either the blasting media or the substrate contains As, Be, Cd or Pb
  - Going forward, proposal may also include Cr and Ni

PAR 219 – Revisions to Existing Exemptions

- Mechanical equipment [(g)(1)]
  - Limit exemption by excluding portable asphalt recycling equipment
- Confection cookers [(i)(3)]
  - Link exemption to (b)(2)
- Equipment to soften or anneal plastics [(j)(4)]
  - Limit exemption to exclude equipment used for recycling of expanded polystyrene
- Injection or blow molding equipment [(j)(6)]
  - Minor clarification for better readability
- Portable coating equipment and pavement stripers [(l)(9)]
  - Limit exemption to exclude coating or pavement striping equipment with added supplemental heat
PAR 219 – Revisions to Existing Exemptions (cont)

- Cleaning equipment [(o)(3)]
  - Limit exemption to exclude DPF filter cleaning
- Chemical sterilization equipment [(p)(11)]
  - Limit exemption to exclude equipment used for incineration
- Agricultural sources [(q)(2)]
  - Next slide
- Exceptions [(s)(2)]
  - Add specific reference to Rule 402 - Nuisance

PAR 219 Proposed Revision Language [(q)(2)]

<table>
<thead>
<tr>
<th>Pollutant (Tons/Year)</th>
<th>South Coast Air Basin</th>
<th>Riverside County Portion of Salton Sea Air Basin</th>
<th>Riverside County Portion of Mojave Desert Air Basin</th>
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<tbody>
<tr>
<td>VOC</td>
<td>5.0</td>
<td>12.5</td>
<td>50.0</td>
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<tr>
<td>NOx</td>
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<tr>
<td>SOx</td>
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<td>CO</td>
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<td>50.0</td>
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<tr>
<td>PM10</td>
<td>35.0</td>
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<td>50.0</td>
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<tr>
<td>Single Hazardous Air Pollutant</td>
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<td>5.0</td>
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<tr>
<td>Combination Hazardous Air Pollutants</td>
<td>12.5</td>
<td>12.5</td>
<td>12.5</td>
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</tbody>
</table>

Alignment with Rule 1302 – Definitions, Amended 11-4-16
Previously Exempt Rule 219
Equipment subject to Permitting

- Non-emergency engines that provide prime power in a dwelling [(c)(5)]
- Equipment used to cut stainless steel or alloys containing >0.1%/wt Cr, Ni, Cd or Pb (new language also intended as a clarification) [(e)(8)]
- Blast cabinets with materials containing As, Be, Cd or Pb [(f)(2)] Also Cr and Ni
- Equipment for separation/segregation of plastics that emit odors [(g)(4)]
- Equipment for recycling of expanded polystyrene [(j)(4)]

Previously Exempt Rule 219
Equipment subject to Permitting

- Pavement stripers where supplemental heat is used [(l)(9)]
- Groups of VOC containing liquids mounted on a mobile platform [(m)(9)]
- Equipment for cleaning DPFs [(o)(3)]
- Heated surface preparation tanks or those containing Pb [(p)(4)]
- Tanks containing Cr, or containing Ni, Pb or Cd that are heated rectified or sparged [(p)(4), (p)(5)]
- Equipment that is integral part of permitted line, unless identified in associated permit [(s)(5)]
PAR 219 Exemption
Requests by Stakeholders*

<table>
<thead>
<tr>
<th>Proposals</th>
<th>Status*</th>
<th>Proposals</th>
<th>Status*</th>
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<tbody>
<tr>
<td>Cooling Towers</td>
<td>PI</td>
<td>Spray Booths</td>
<td>PD</td>
</tr>
<tr>
<td>Bench Scale Operations</td>
<td>PD</td>
<td>Oil and Gas Wells</td>
<td>I</td>
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<tr>
<td>Aqueous Ammonia Storage</td>
<td>PD</td>
<td>Food Ovens</td>
<td>PD</td>
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<tr>
<td>Chlorine Storage</td>
<td>I</td>
<td>Dry Grinding Comminutors</td>
<td>PD</td>
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<tr>
<td>PERP Engines</td>
<td>PI</td>
<td>Engines used for Training</td>
<td>PD</td>
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<tr>
<td>Decarbonators for Water Treatment</td>
<td>PD</td>
<td>Gaseous/Liquid Fuel Fired Combustion Equipment</td>
<td>PD</td>
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<td>UV/EB &amp; UV/LED Materials</td>
<td>PI</td>
<td>Floating Roof Tanks</td>
<td>PD</td>
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<tr>
<td>Asphalt Distributor Truck</td>
<td>PD</td>
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</tbody>
</table>

*Described further in Preliminary Draft Staff Report beginning on page 2-25, Table 2-4
*PD = Proposal Deferred, I = Incorporated, PI = Partially Incorporated

PAR 222 Proposed Additions to Filing Program

- Industrial cooling towers
- Natural gas and crude oil production equipment
  - Natural gas pipeline transfer pumps
  - Natural gas repressurizing equipment
- Storage tanks for aqueous urea storage
**PAR 222 Modifications to Existing Equipment Categories**

- **Food Ovens**
  - 1 lb/day VOC limit applicable to all process VOC emissions, not only to yeast fermentation

- **Fuel Cells**
  - Only fuel cells with combustion-based supplemental heating source need to be registered

- **Engines for Electrical Generation at Remote, 2-way Radio Transmission Towers**
  - Adding cleaner fuels (CNG & LPG) in addition to diesel #2

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**Next Steps**

- Complete Impacts Assessments
  - Emissions and facility inventories
  - Socioeconomic
  - CEQA

- Additional feedback on staff proposal
  - Requested by March 10, 2017

- **Stationary Source Committee meeting** - March 17, 2017

- Set public hearing – April 7, 2017

- Board hearing – May 5, 2017
## Remaining Rulemaking Schedule

<table>
<thead>
<tr>
<th>Meeting</th>
<th>Date</th>
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<tbody>
<tr>
<td>Stationary Source Committee</td>
<td>March 17, 2017</td>
</tr>
<tr>
<td>Set Hearing</td>
<td>April 7, 2017</td>
</tr>
<tr>
<td>Public Hearing</td>
<td>May 5, 2017</td>
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## PUBLIC COMMENTS