

BOARD MEETING DATE: February 2, 2024

AGENDA NO. 29

PROPOSAL: Determine That Proposed Amendments to BACT Guidelines Are Exempt from CEQA and Amend BACT Guidelines

SYNOPSIS: Periodically, after consultation with stakeholders through the BACT Scientific Review Committee, staff proposes amendments to the BACT Guidelines to reflect technological advancements in emissions controls and to maintain consistency with recent changes to South Coast AQMD rules and regulations as well as state requirements. Staff is proposing to add seven new listings and amend two existing listings in the following sections of the BACT Guidelines: Part B: Lowest Achievable Emission Rate Determinations for Major Polluting Facilities; and Part D: BACT Determinations for Non-Major Polluting Facilities. Staff is also proposing administrative and routine updates to the following sections of the BACT Guidelines: Overview; Part A: Policy and Procedures for Major Polluting Facilities; Part C: Policy and Procedures for Non-Major Polluting Facilities; and Part E: Policy and Procedures for Facilities Subject to Prevention of Significant Deterioration for GHGs.

COMMITTEE: Stationary Source, January 19, 2024; Recommended for Approval

RECOMMENDED ACTIONS:

1. Determine the proposed amendments to the BACT Guidelines are exempt from the requirements of the California Environmental Quality Act; and
2. Amend the BACT Guidelines.

Wayne Natri
Executive Officer

Background

South Coast AQMD's Regulation XIII – New Source Review requires facilities to implement BACT for new, relocated, and modified permitted sources that may result in an emission increase of any nonattainment air contaminant, any ozone depleting compound, or ammonia. Regulation XIII requires the Executive Officer to periodically publish updates to the BACT Guidelines to establish the procedures and the requirements for applying BACT to commonly permitted equipment.

The BACT Guidelines include an Overview section, which provides an introduction to the BACT Guidelines and a summary of how BACT and Lowest Achievable Emission Rate (LAER) are implemented in the South Coast AQMD, as well as a technical portion separated into three parts: Major Polluting Facilities (Parts A and B), Non-Major Polluting Facilities (Parts C and D), and facilities subject to prevention of significant deterioration (PSD) for GHGs (Parts E and F).

A facility is a Major Polluting Facility if it emits or has the potential to emit a criteria air pollutant that equals or exceeds the emission thresholds in South Coast AQMD's Regulation XXX – Title V Permits. Major Polluting Facilities that are subject to NSR are required by the federal Clean Air Act (CAA) to have LAER. South Coast AQMD implements the federal CAA requirement for LAER using BACT determinations that are incorporated in the BACT Guidelines. At the state level, Health and Safety Code Section 40405 defines BACT in a similar manner to federal LAER and requires the application of BACT for all new and modified permitted sources subject to NSR.

In accordance with Health and Safety Code Section 40440.11, in updating Part D of the BACT guidelines with new or more stringent Minor Source BACT (MSBACT), South Coast AQMD must follow a rigorous process including cost-effectiveness analysis, notification to the public, review by the Scientific Review Committee (SRC) at public meetings, and approval by the Governing Board.

GHG BACT applies to new or modified facilities subject to PSD requirements for GHG emissions. Requirements for determining applicability of new or modified sources are promulgated in Chapter 40 of the Code of Federal Regulations Section 52.21. In general, GHG BACT determinations are project-specific with a focus on options that improve energy efficiency.

Proposed Amendments to the BACT Guidelines

The proposed amendments are to update the Overview section, and Parts A, B, C, D, and E of the BACT Guidelines to reflect technological advancements in emissions controls and to maintain consistency with recent changes to South Coast AQMD rules and regulations as well as state requirements. No amendments are proposed to Part F.

Staff is also proposing to update the Maximum Cost-Effectiveness values in Part C- Policy and Procedures for Non-Major Polluting Facilities, consistent with the third quarter 2023 Marshall and Swift equipment index.

A summary of the proposed amendments to the BACT Guidelines are included in Attachment A. Details of the proposed amendments to the BACT Guideline covering the Overview section, Parts A, B, C, D, and E are included in Attachments B through G.

The proposed new Part B LAER determinations for Major Polluting Facilities are summarized in Table 1 below with the complete proposed determinations included in Attachment D. The other portions of Part B are not included in this Board package because they are not being updated at this time.

Table 1 - Summary of Proposed Part B LAER Determinations

Equipment Category	Current LAER Limit	Proposed LAER Limit
Fugitive Emission Sources at Petroleum Refineries	VOC: 500 ppm*	VOC: 200 ppm
Heater, Other Process, Natural Draft Operation, Multiple Burners, Fired on Natural Gas/Process Gas, 12.5 MMBtu/hr	New Listing	NOx: 7 ppm @ 3% O ₂ dry CO: 100 ppm @ 3% O ₂ dry
Linear Generator, Non-Emergency Electrical Generator, Natural Gas Fired	New Listing	NOx: 2.5 ppm @ 15 % O ₂ dry CO: 12 ppm @ 15 % O ₂ dry VOC: 25 ppm @ 15 % O ₂ dry
Sulfur Recovery Unit and Tail Gas Treatment Unit followed by a Tail Gas Incinerator and Caustic Scrubber	New Listing	NOx: 0.05 lb/MMBtu** natural gas CO: 0.03 lb/MMBtu natural gas SOx: 12 ppm @ 0% O ₂ dry H ₂ S***: 2.5 ppm @ 0% O ₂ dry
Tank Truck Loading/Unloading Racks	New Listing	VOC: 0.02 lb/1000 gal
Boiler, Natural Gas Fired, > 20 MMBtu/hr	New Listing	NOx: 2.5 ppm @ 3% O ₂ dry CO: 50 ppm @ 3% O ₂ dry
Heater, Other Process, Natural Draft Operation, Single Burner, Fired on Natural Gas, 15 MMBtu/hr	New Listing	NOx: 6 ppm @ 3% O ₂ dry CO: 50 ppm @ 3% O ₂ dry
Simple Cycle Gas Turbine, Dry Low NOx Burners, Natural Gas Fired	CO: 4 ppm	CO: 2 ppm @ 15% O ₂ dry

* Part per million

** Pound per million British thermal unit

*** Hydrogen sulfide

The proposed Part D BACT Determinations for Non-Major Polluting Facilities are summarized in Table 2 below with the complete proposed determinations included in Attachment F. The proposed amendments comply with the requirements of Health and Safety Code Section 40440.11, as explained below.

Table 2 – Summary of Proposed Part D BACT Determinations

Equipment Category	Current BACT Limit	Proposed BACT Limit
Crumb Rubber/Asphalt Oil Blending - Carbon Adsorber	New Listing	VOC: 90% Control Efficiency

Compliance with Health and Safety Code Section 40440.11

In amending the BACT Guidelines for Non-Major Polluting Facilities to be more stringent, South Coast AQMD must comply with Health and Safety Code Section 40440.11 for the proposed new BACT determination for Crumb Rubber/Asphalt Oil Blending. The proposed new BACT determination complies with the Health and Safety Code because:

- Installing a granulated activated carbon (GAC) unit which controls VOC emissions is a commercially viable achieved in practice control alternative that constitutes BACT;
- A Crumb Rubber/Asphalt Oil Blending with GAC unit that can meet 90 percent VOC control efficiency has been commercially available for several years; and
- The results of the cost-effectiveness analysis performed to assess the incremental equipment and operating cost of the two carbon canisters show that the proposed control technology is cost effective. More details are included in Attachment A and F, and cost-effectiveness calculations are included in Attachment H.

Public Process

The BACT SRC was established as a standing committee by the Board to enhance the public participation process with technical review and comments by a focused committee at periodic intervals, prior to updating the BACT Guidelines. The BACT SRC meetings includes affected facilities, industry associations, equipment vendors, public agencies, academia, and environmental/ community groups. The proposed amendments to the BACT Guidelines were presented to the BACT SRC on February 23, 2023 and July 25, 2023. A 30-day comment period was provided to the public to review and submit comments. As part of this BACT determination process, staff had individual meetings with affected stakeholders and industry groups.

Key Issues

Through the BACT determination process, staff has worked with stakeholders to address and resolve issues. Staff is not aware of any remaining key issues.

California Environmental Quality Act

Pursuant to the California Environmental Quality Act (CEQA) Guidelines Sections 15002(k) and 15061, the proposed project (Proposed Amendments to the BACT Guidelines) is exempt from CEQA pursuant to CEQA Guidelines Sections 15061(b)(3) and 15308. Further, there is no substantial evidence indicating that any of the exceptions set forth in CEQA Guidelines Section 15300.2 apply to the proposed project. A Notice of Exemption has been prepared pursuant to CEQA Guidelines Section 15062 and is included as Attachment J to this Board letter. If the proposed project is approved, the Notice of Exemption will be filed for posting with the county clerks of Los Angeles, Orange, Riverside, and San Bernardino counties, and with the State Clearinghouse of the Governor's Office of Planning and Research.

Socioeconomic Impact Assessment

The proposed amendments seek to update the BACT Guidelines and to maintain consistency with recent changes to South Coast AQMD rules and state requirements. These proposed amendments represent achieved in practice emission control equipment and/or processes in addition to other amendments which are administrative in nature. No socioeconomic impact assessment is required under Health and Safety Code Sections 40440.8 and 40728.5, because this is not a rule or regulation in the meaning of those statutes.

Benefits to South Coast AQMD

Emission reductions realized through new, modified, and relocated permitted sources that apply the latest BACT ensures that these sources are using the cleanest technology available. In addition, the successful implementation of BACT for permitted stationary sources will contribute towards achieving state and federal air quality standards, which is consistent with the objectives of the Air Quality Management Plan.

Resource Impacts

Existing South Coast AQMD resources will be sufficient to implement the proposed amendments to the BACT Guidelines.

Attachments

- A. Summary of Proposed Amendments to BACT Guidelines
- B. Proposed Amended BACT Guidelines, Overview
- C. Proposed Amended BACT Guidelines, Part A
- D. Proposed Amended BACT Guidelines, Part B
- E. Proposed Amended BACT Guidelines, Part C
- F. Proposed Amended BACT Guidelines, Part D
- G. Proposed Amended BACT Guidelines, Part E
- H. Cost-Effectiveness Calculations
- I. Comments and Responses
- J. Notice of Exemption from CEQA
- K. Board Presentation

ATTACHMENT A

SUMMARY OF PROPOSED AMENDMENTS TO BACT GUIDELINES

The proposed amendments are to update the Overview section, and Parts A, B, C, D, and E of the BACT Guidelines to reflect technological advancements in emissions controls and to maintain consistency with recent changes to South Coast AQMD rules and regulations as well as state requirements. No amendments are proposed to Part F.

Overview

The Overview provides an introduction to the BACT Guidelines and a summary of how BACT and LAER are implemented at South Coast AQMD.

Consistent with Rule 1302, proposed amendments to Table 1 in the Overview include revising the VOC and NOx actual or potential emission threshold levels for major polluting facilities.

Adding a hyperlink to footnote 7 in order to include an Engineering Policy & Procedures dated 8/7/2019 to determine premodification Potential To Emit (PTE).

Administrative changes such as referring to United States Environmental Protection Agency or USEPA as “U.S. EPA”; and replacing “Engineering and Compliance” with “Engineering and Permitting” to be consistent with the organizational chart are also proposed.

The complete proposed amended Overview section is included in Attachment B.

Part A – Policy and Procedures for Major Polluting Facilities

Part A describes the policy and procedures for major polluting facilities and explains what LAER is, why it is required, when it is required, and how it is determined for major polluting facilities.

Other amendments include adding a hyperlink to South Coast AQMD’s protocol for determination of Volatile Organic Compounds (VOC) capture efficiency as well as adding clarifying language to Chapter 2.

Administrative changes such as referring to United States Environmental Protection Agency or USEPA as “U.S. EPA” are also proposed.

The complete proposed amended Part A is included in Attachment C.

Part B – LAER Determinations for Major Polluting Facilities

Part B consists of three sections: Section I contains listings of LAER determinations made by South Coast AQMD; Section II contains listings of LAER determinations made by other air districts; and Section III contains listings of emerging technologies which have been in operation with an air quality permit but do not yet qualify as LAER. The proposed new and updated Part B LAER determinations of Sections I and II are summarized below with the complete proposed determinations included in Attachment D.

The other portions of Sections I, II, and III are not included in this Board package because they are not being updated at this time.

Section I – South Coast AQMD LAER/BACT Determinations

Four new and one updated listing are proposed, as summarized below. All new listings were found to be achieved in practice, as defined in the BACT Guidelines.

Fugitive Emission Sources at Petroleum Refineries (update)

Facilities such as refineries store, transport, and use organic liquids that readily vaporize at relatively low temperature and lose some organic material as fugitive emissions wherever there is a leak at the connection between two pieces of equipment. Valves, pumps, and compressors can also leak organic material. The proposed LAER requires that the maximum fugitive leak detection limit be lowered from 500 ppm to 200 ppm based on the achieved in practice cases, for fugitive components in VOC service except for pumps, compressors, and drains.

Heater, Other Process, Natural Draft Operation, Natural Gas/Process Gas Fired (new)

This is a new listing to establish a new LAER/BACT determination for heaters. The natural draft heater is located at a terminal. The facility receives gasoline and diesel fuel via pipeline and operates bulk loading stations to transfer the product into tanker trucks. The gasoline/diesel blend is separated via flash distillation process where a gas-fired heater is used to provide the heat for the distillation process. The heater is rated at 12.5 MMBtu/hr and equipped with three ultra-low NO_x burners which can achieve low NO_x emissions without using post-combustion control technologies such as Selective Catalytic Reduction (SCR). The heater burns a combination of natural gas and process gas at 75% to 25% ratio. Source test results confirm compliance with 7 ppm NO_x and 100 ppm CO limit corrected to 3 percent O₂ over 15 mins averaging time.

Linear Generator, Non-Emergency Electrical Generator, Natural Gas Fired (new)

This new listing is solely for linear generators fired on natural gas and used for non-emergency applications to produce electricity. Each system contains two linear generator cores, operating in tandem. Due to the low operating temperature, NO_x emissions are low. Each core is equipped with oxidation catalyst for VOC and CO reduction. The achieved in practice cases are two linear generator systems rated at 240 kilowatts electric (kWe) each. Source test results

confirm compliance with 2.5 ppmv NO_x, 12 ppmv CO, and 25 ppmv VOC limit corrected to 15 percent O₂.

Rule 1110.3 - Emissions from Linear Generators, adopted on November 3, 2023, requires all units with a permit to operate issued on or after rule adoption comply with 2.5 ppmv NO_x, 12 ppmv CO, and 10 ppmv VOC limits corrected to 15 percent O₂. Rule 1110.3 is being submitted for inclusion in the State Implementation Plan.

Sulfur Recovery (Claus) Unit (new)

This listing is based on permitted equipment with a tail gas treatment unit (TGTU), tail gas incinerator, and caustic scrubber located at a refinery. Acid gas feeds into SRU where it enters the Claus unit to recover sulfur, then the TGTU. The TGTU vents to the tail gas incinerator and caustic scrubber to remove remaining H₂S and SO_x. The tail gas incinerator utilizes natural gas as the primary fuel to combust the tail gas from the TGTU and reduce the tail gas emissions to below the proposed limits. This new LAER listing is to establish a 0.05 lb/MMBtu NO_x, 0.03 lb/MMBtu CO, as well as 12 ppmv SO_x and 2.5 ppmv H₂S limit at 0 percent O₂ for a sulfur recovery unit. The emissions limits have been shown to be achieved in practice since 2015 and source tests have demonstrated compliance with the permit limits.

Tank Truck Loading/Unloading Racks (new)

This listing is from a facility that receives gasoline and diesel fuel via pipeline from refineries and operates bulk loading stations to transfer the product into tanker trucks. The facility has a vapor recovery/collection and disposal system (VCDS) to control VOC. This VCDS is vented to a direct flame thermal oxidizer to control VOC from tanks degassing/refilling and loading rack operations. Current VCDS has a permit condition to limit the VOC to 0.02 lb /1000 gal of fuel loaded. It has been source tested in 2010 and has been operating in compliance.

Section II – Other LAER/BACT Determinations

Two new and one updated listing are proposed, as summarized below.

Boiler, Natural Gas Fired > 20 MMBtu/hr (new)

This new listing establishes a LAER/BACT determination based on a boiler at a corrugated container manufacturing plant located in the San Joaquin Valley Air Pollution Control District (SJVAPCD). The natural gas fire-tube boiler, permitted in 2018, is rated at 29.47 MMBtu/hr. It uses a low NO_x burner system and a SCR system to meet the 2.5 ppm NO_x and 50 ppm CO limits corrected to 3 percent O₂. The source test performed in 2020 demonstrated compliance with the permit emission limits and established this boiler as an achieved in practice case.

Heater, Other Process, Natural Draft Operation, Natural Gas Fired (new)

This listing is to establish a new LAER/BACT determination based on a heater at a refinery located in SJVAPCD. The facility is a lube oil finishing plant. The heater provides heat for the plant's utility fractionator, which removes sulfur from various products by re-running crude and other off-spec stocks from other processes at the refinery. The heater, fired solely on natural gas, is rated at 15 MMBtu/hr and is equipped with one ultra-low NOx process burner which achieves low NOx without using post-combustion control technologies such as SCR. Results from two source tests performed in 2017 and 2020 confirm this heater as a successful achieved in practice case by meeting the permit emission limits of 6 ppm NOx and 50 ppm CO corrected to 3 percent O₂ over 30 minutes averaging time.

Gas Turbine -Simple Cycle, Natural Gas Fired (update)

This listing update is based on an achieved in practice case at a simple cycle power plant in Bay Area AQMD which was permitted in 2015. Source test results, at 15 percent O₂, from 2019 and 2021 show compliance with permitted emissions limit of 2 ppmv CO. Combined, the four 190 megawatt (MW) dry low NOx burner natural gas fired combustion turbine generators generate a maximum of 760 MW of electrical power. Each turbine is equipped with an SCR system and an oxidation catalyst.

Part C – Policy and Procedures for Non-Major Polluting Facilities

Part C describes the policy and procedures for non-major polluting facilities and explains what BACT is, why it is required, when it is required and how it is determined for non-major polluting facilities.

Update the Maximum Cost-Effectiveness Values on Table 5 consistent with the third quarter 2023 Marshall and Swift equipment index in accordance with the BACT Guidelines policy.

Administrative changes such as referring to United States Environmental Protection Agency or USEPA as “U.S. EPA” are also proposed.

The complete proposed amended Part C is included in Attachment E.

Part D – BACT Determinations for Non-Major Polluting Facilities

Part D consists of BACT determinations for minor sources which are established in accordance with state law at the time an application is deemed complete.

The proposed new and updated amendments to Part D are for equipment and processes which have been achieved in practice and to maintain consistency with recent changes to South Coast AQMD rules and state requirements. All proposed Part D amendments and updates, except for the proposed new Crumb Rubber/Asphalt Blending listing, will not result in more stringent requirements than would otherwise occur through current

SIP-approved rule compliance, which constitutes Minor Source BACT (MSBACT) under Part C – Policy Guidance. In addition, staff has concluded through the implementation of these SIP-approved rules that these MSBACT determinations are achieved in practice and cost effective. The proposed amendments comply with the requirements of Health and Safety Code Section 40440.11.

Administrative changes such as referring to United States Environmental Protection Agency or USEPA as “U.S. EPA”; and correcting a footer for the Tire Buffer listing on Page 124 to replace “Thermal Oxidizer” with “Tire Buffer” are also proposed.

The proposed amended Part D BACT determinations are summarized below with the complete proposed amended Part D included in Attachment F.

Crumb Rubber/Asphalt Oil Blending (new)

The goal is to list the Crumb Rubber/Asphalt Oil Blending category and formalize the existing permitted VOC limit in the BACT Guidelines. The achieved in practice source is located at a facility which produces asphaltic concrete. Asphaltic concrete typically consists of asphalt oil and aggregate. This facility produces asphaltic concrete with the use of a mixture of asphalt oil and crumb rubber, in lieu of only asphalt oil. The benefits of using crumb rubber include reduced asphalt oil usage, increase of final product elasticity, and the recycling of rubber. A granulated activated carbon (GAC) unit controls VOC emissions from the tanks of the crumb rubber/asphalt blending system. VOC emissions from the tanks are vented to the primary carbon canister where VOC emissions are controlled by at least 90%. VOC leaving the primary canister vents to the secondary for further control. The facility has operated the GAC unit since 2020. Source test results confirm compliance with 90% control efficiency. The capital and operating cost data for the GAC unit with two carbon canisters was provided by the facility consultant. A cost-effectiveness analysis was done to assess the incremental capital and operating costs in accordance with Health and Safety Code 40440.11, which is further discussed in the “Compliance with the Health and Safety Code” section. The cost-effectiveness evaluation shows installing GAC unit downstream of the Crumb Rubber/Asphalt Oil Blending system is cost effective. Staff is proposing to add 90% control efficiency for Rubber/Asphalt Oil Blending system.

Part E – Policy and Procedures for Facilities Subject to Prevention of Significant Deterioration for Greenhouse Gases

Part E describes the policy and procedures for facilities subject to PSD for Greenhouse Gases and explains what BACT is, why it is required, when it is required and how it is determined for the subject facilities.

The only proposed changes to Part E are administrative in nature such as referring to United States Environmental Protection Agency or USEPA as “U.S. EPA”.

The complete proposed amended Part E is included in Attachment G.

Compliance with the Health and Safety Code Section 40440.11

In amending the BACT Guidelines for non-major polluting facilities to be more stringent, South Coast AQMD must comply with Health and Safety Code Section 40440.11. Staff is proposing a new BACT determination in Part D for Crumb Rubber/Asphalt Oil Blending System. The following paragraphs identify the applicable requirements in Health and Safety Code Section 40440.11 and demonstrate compliance with each requirement:

(c)(1) Identify one or more potential control alternatives that may constitute the Best Available Control Technology as defined in Health and Safety Code Section 40405.

Crumb Rubber/Asphalt Oil Blending System

Commercially viable achieved in practice control alternatives that may constitute BACT would be installing a GAC unit which reduces VOC emissions from a Crumb Rubber/Asphalt Oil Blending System. VOC emissions from the system are first vented to the primary canister where VOC are controlled by at least 90%. VOC leaving the primary canister vent to the secondary for further control.

(c)(2) Determine that the proposed emission limitation has been met by production equipment, control equipment, or a process that is commercially available for sale, and has achieved the best available control technology in practice on a comparable commercial operation for at least one year, or a period longer than one year if a longer period is reasonably necessary to demonstrate the operating and maintenance reliability, and costs, for an operating cycle of the production or control equipment, or process.

Crumb Rubber/Asphalt Oil Blending System equipped with GAC unit that can achieve 90% VOC overall control efficiency and has been commercially available for several years. Staff has included in Attachment F proposed BACT determinations. This equipment has been in commercial operation for over one year, source tested, and verified compliance with 90% overall control efficiency. The cost-effectiveness analysis has been conducted based on the cost data provided by the facility consultant.

(c)(3) Review the information developed to assess the cost-effectiveness (annual cost of control divided by annual emission reduction potential) of each potential control alternative.

A cost-effectiveness analysis was performed to assess the incremental equipment and operating cost of two carbon canisters to achieve 90% overall control efficiency versus no control. Staff reviewed source test data to calculate the VOC emission reduction and reviewed the cost data provided by the facility consultant to assess the cost-effectiveness of installing carbon canisters. See calculations spreadsheet in Attachment H.

(c)(4) Calculate the incremental cost-effectiveness for each potential control option (difference in cost divided by difference in emissions for each progressively more stringent control option)

The incremental cost-effectiveness analysis included calculations of incremental cost per ton of VOC reduced using two carbon canisters. The results show that the proposed control technology is cost effective. See calculations spreadsheet in Attachment H.

(c)(5) Place the Best Available Control Technology revision proposed on the calendar of a regular meeting agenda of the South Coast AQMD Governing Board for its acceptance or further action as the board determines.

The proposed revisions to the BACT Guidelines were placed on the agenda of the February 2, 2024 meeting of the South Coast AQMD Governing Board.

OVERVIEW

Chapter 1 - Introduction

The South Coast Air Quality Management District (South Coast AQMD) Regulation XIII – New Source Review (NSR) and Regulation XX – RECLAIM, require applicants to use Best Available Control Technology (BACT) for new sources, relocated sources, and modifications to existing sources that may result in an emission increase of any nonattainment air contaminant, any ozone depleting compound (ODC), or ammonia. Regulation XIII requires the Executive Officer to periodically publish BACT Guidelines that establish the procedures and the BACT requirements for commonly permitted equipment.

South Coast AQMD Regulation XIV – Toxics and Other Non-Criteria Pollutants, requires applicants to use Best Available Control Technology for Toxics (T-BACT) for new, relocated or modified permit units that result in a cumulative increase in Maximum Individual Cancer Risk (MICR) of greater than one in a million (1.0×10^{-6}) at any receptor location. Additionally, Regulation XVII – Prevention of Significant Deterioration (PSD) also sets forth BACT requirements for new sources, relocated sources and modifications to existing sources that emit attainment air contaminants. PSD BACT is incorporated into these BACT Guidelines. As of the publication date of these guidelines, there is currently no requirement for South Coast AQMD to publish T-BACT guidelines and T-BACT must be established during the permitting process.

Historically, the BACT Guidelines were first published in May 1983, and later revised in October 1988. The Guidelines consisted of two parts: Part A – Policy and Procedures, and Part B – BACT Determinations. Part A provided an overview and general guidance while Part B contained specific BACT information by source category and pollutant. Since the October 1988 revision, Part A was amended once in 1995, and Part B was updated with six LAER determinations between 1997 and 1998.

On December 11, 1998, the Governing Board approved a new format for listing BACT determinations in Part B of the Guidelines. While the previous Part B of the BACT Guidelines specified BACT requirements and set out source category determinations which could be interpreted as definitive, the new format simply provides listings of recent BACT determinations by South Coast AQMD permitting staff and others as well as information on new and emerging technologies. Part B of the South Coast AQMD BACT Guidelines now follows the same outline as the permit listings in the California Air Resources Board State [BACT Technology](#) Clearinghouse Database, which is managed under the direction of the California Air Pollution Control Officers Association's (CAPCOA) Engineering Managers Committee. In addition, BACT determinations made by South Coast AQMD are submitted to the U.S. Environmental Protection Agency (U.S. EPA) RACT/BACT/LAER Clearinghouse by ARB staff. Further information on the format of the Guidelines, including reasons for the change in direction, may be found in Board Letters presented at the October 1998 Board Meeting, Agenda No. 41, and the December 1998 Board Meeting, Agenda No. 28.

The public participation process includes technical review and comments by a focused BACT Scientific Review Committee (BACT SRC) at periodic intervals, prior to the updates of the South Coast AQMD BACT Guidelines. The Board established a 30-day notice period for the BACT SRC and interested persons to review and comment

on South Coast AQMD BACT determinations that result in BACT requirements that are more stringent than previously imposed BACT.

As a result of amendments to South Coast AQMD's NSR regulations in September 2000, the BACT Guidelines were separated into two sections: one for major polluting facilities and another for non-major (minor) polluting facilities. (See Chapter 2 in the Overview for how to determine if a facility is major or minor).

The BACT Guidelines for major polluting facilities include:

- Part A: Policy and Procedures for Major Polluting facilities; and
- Part B: LAER/BACT Determinations for Major Polluting Facilities.

The BACT Guidelines for non-major polluting facilities include:

- Part C: Policy and Procedures for Non-Major Polluting Facilities; and
- Part D: BACT Guidelines for Non-Major Polluting Facilities.

Both the format of the guidelines and the process for determining BACT are significantly different between major and non-major polluting facilities. Major polluting facilities that are subject to NSR are required by the Clean Air Act to have the Lowest Achievable Emission Rate (LAER). LAER is determined at the time the permit is issued, with little regard for cost, and pursuant to U.S. EPA's LAER policy as to what is achieved in practice. The Part B BACT and LAER determinations for major polluting facilities are only examples of past determinations that help in determining LAER for new permit applications.

For non-major polluting facilities, BACT will be determined in accordance with state law at the time an application is deemed complete unless a more stringent rule requirement becomes applicable prior to permit issuance. For the most part, it will be as specified in Part D of the BACT Guidelines. Changes to Part D for minor source BACT (MSBACT) to make them more stringent will be subject to public review and South Coast AQMD Board approval, for consideration of cost.

For the 2016 amendment to the Guidelines, additional parts have been added to address PSD requirements for greenhouse gas (GHG) emissions established by U.S. EPA in 40 CFR 52.21 in 2011. The requirements are incorporated by reference in South Coast AQMD Rule 1714. The BACT Guidelines for GHG requirements include:

- Part E: Policy and Procedures for Facilities Subject to Prevention of Significant Deterioration for Greenhouse Gases; and
- Part F: BACT Determinations for Facilities Subject to Prevention of Significant Deterioration for Greenhouse Gases.

In order to distinguish between BACT for various sources, this document will use the following nomenclature for BACT:

LAER for BACT at major polluting facilities

MSBACT for BACT at non-major polluting facilities

PSD BACT for BACT at facilities subject to BACT requirements for criteria pollutants

Written comments about the BACT Guidelines are welcome at any time and will be evaluated by South Coast AQMD staff and included in the BACT Docket at the South Coast AQMD library. These comments should be addressed to:

South Coast Air Quality Management District
BACT Team
Engineering and Permitting
21865 Copley Dr.
Diamond Bar, CA 91765-0934

Comments may also be submitted via email to BACTTeam@aqmd.gov, and should include BACT Docket in the subject line.

The BACT Guidelines are available without charge from South Coast AQMD's web site at www.aqmd.gov/home/permits/bact. A hardcopy of the BACT Guidelines may be obtained for a fee by submitting a request to Subscription Services at www.aqmd.gov/contact/subscription-services or by calling (909) 396-3720. Revisions to the Guidelines will be mailed to all persons that have purchased annual updates to the BACT Guidelines.

Chapter 2 – Applicability Determination

This chapter explains how to determine whether a facility is a major or minor polluting facility, and how a facility can become a minor polluting facility.

MAJOR POLLUTING FACILITY EMISSION THRESHOLDS

A facility is a major polluting facility (or a major stationary source as it is called in the federal Clean Air Act [CAA]) if it emits, or has the potential to emit (PTE), a criteria air pollutant at a level that equals or exceeds emission thresholds specified in the CAA¹ based on the attainment or nonattainment status. Table 1 presents those emission thresholds for each criteria air pollutant for each air basin in South Coast AQMD. The map in Figure 1 shows the location of the three air basins in South Coast AQMD. If a threshold for any one criteria pollutant is equaled or exceeded, the facility is a major polluting facility, and will be subject to LAER for all pollutants subject to NSR. Table 1 does not include emission thresholds that trigger GHG BACT for South Coast AQMD Rule 1714 and 40 CFR 52.21. Part E of the BACT Guidelines should be referenced for a detailed explanation of how GHG BACT emission thresholds are determined.

A facility includes all sources located within contiguous properties owned or operated by the same person, or persons under common control. Contiguous means in actual contact or separated only by a public roadway or other public right-of-way. However, on-shore crude oil and gas production facilities under the same ownership or use entitlement must be included with offshore crude oil and gas production facilities located in Southern California Coastal or Outer Continental Shelf waters.

The following mobile source emissions are also considered as part of the facility²:

1. Emissions from in-plant vehicles; and
2. All emissions from ships during the loading or unloading of cargo and while at berth where the cargo is loaded or unloaded; and
3. Non-propulsion ship emissions within Coastal Waters under South Coast AQMD jurisdiction.

¹ The major source emission thresholds are higher for air basins that comply with the national ambient air quality standard and lower depending on how far an air basin is from compliance with the standard for a pollutant.

The lowest thresholds apply to extreme non-attainment air basins, the only ones which are the South Coast Air Basin and San Joaquin Valley Air Basin for ozone (VOC and NOx).

² In accordance with Rule 1306(g).

Table 1
Actual or Potential Emission Threshold Levels (Tons per Year)
for Major Polluting Facilities

Pollutant	South Coast Air Basin	Riverside County Portion of Salton Sea Air Basin	Non-Palo Verde, Riverside County Portion of Mojave Desert Air Basin
VOC	10	25 10	100
NOx	10	25 10	100
SOx ³	70	70	100
CO	50	100	100
PM ₁₀	70	70	100
PM _{2.5}	70	---	---

Figure 1: Map of South Coast AQMD



³ The threshold for SOx, as a precursor for PM, is 70 tons per year for serious PM₁₀ areas, which the SCAB previously was, and 70 tons per year for serious PM_{2.5} areas, which the SCAB currently is. Rule 1302 previously specified 100 tons per year, which was in error, and was changed at the November 2016 Board Meeting.

POTENTIAL TO EMIT

Potential to emit is based on permit conditions that limit emissions or throughput. If there are no such permit conditions, PTE is based on:

- the maximum rated capacity; and
- the maximum daily hours of operation; and
- physical characteristics of the materials processed.

The PTE must include fugitive emissions associated with the source. RECLAIM emission allocations are not considered emission limits because RECLAIM facilities may purchase RTCs and increase their emissions without modifying their permit. For PSD purposes, as well as Rule 1325 for PM_{2.5}, which incorporates federal requirements, fugitive emissions are included only for major source categories specifically identified in 40 CFR 52.21.

LIMITING POTENTIAL TO EMIT

A facility's PTE can be capped by an enforceable permit condition that limits emissions. This condition will likely involve monitoring, recordkeeping and reporting to ensure that emissions remain below the permit limit.

Chapter 3 - When is BACT Required?

This chapter explains when BACT is required by identifying the air pollutants subject to BACT, the permit actions that trigger BACT review, and the calculation procedures to determine emission increases.

POLLUTANTS SUBJECT TO NSR, PSD AND BACT

The South Coast AQMD's New Source Review (NSR) programs include *Regulation XIII - New Source Review* and *Rule 2005 - New Source Review for RECLAIM*. Rule 2005 applies only to NO_x and SO_x emissions from RECLAIM facilities, while Regulation XIII applies to other non-attainment air pollutants from RECLAIM facilities, all non-attainment air pollutants from all other facilities, and ammonia and ozone-depleting compound (ODC) emissions from all facilities. ODCs are defined as Class I substances listed in 40 CFR, Part 82, Appendix A, Subpart A, and are listed in Table 2. Rule 1325 specifically applies to PM_{2.5}.

Although the South Coast AQMD is in attainment with the ambient air quality standards for SO₂ and NO₂, NO_x is a precursor to ozone, and both SO_x and NO_x are precursors to PM₁₀ and PM_{2.5}, which are non-attainment air pollutants. Therefore, SO_x and NO_x are treated as non-attainment air pollutants as well. The net result is that VOC, NO_x, SO_x, PM₁₀ and PM_{2.5} are subject to NSR in all of South Coast AQMD.

The South Coast Air Basin has historically been designated nonattainment for CO. However, there has been considerable improvement in CO air quality in the Basin from 1976 to 2005. In 2001, the Basin met both the federal and state 8-hour CO standards for the first time at all monitoring stations. The 2003 AQMP revision to the CO plan served a dual purpose; it replaced the 1997 attainment demonstration that lapsed at the end of 2000, and it provided the basis for a CO maintenance plan in the future. The Basin was designated as attainment for CO in 2007. Therefore, CO is in attainment with state and federal ambient air quality standards.

The South Coast AQMD's Regulation XVII – Prevention of Significant Deterioration sets forth BACT requirements for stationary sources that emit attainment air contaminants. The BACT requirement applies to any net emission increase of a criteria pollutant from a permit unit at any source. As explained in the South Coast AQMD Staff Report for Regulation XVII dated September 28, 1988 for the October 7, 1988 Board meeting, the PSD BACT requirement is applicable to all permit units regardless if the source is classified as a minor or major facility.

Lead (Pb) is a criteria air pollutant and is subject to BACT in areas of non-attainment, or is subject to PSD in areas of attainment. Pb can be a component of a source's PM₁₀ emissions and is therefore subject to BACT for PM₁₀. BACT for Pb will be BACT for PM₁₀ or compliance with Rules 1420, 1420.1 or 1420.2, whichever is more stringent.

The applicability of the various pollutants to NSR in the various air basins is summarized in Table 3. See Figure 1 in the previous chapter for a map of South Coast AQMD that shows the location of the three air basins in South Coast AQMD.

Table 2
Class I Substances (ODCs)*

<p>A. Group I: CFCl_3 Trichlorofluoromethane (CFC-11) CF_2Cl_2 Dichlorodifluoromethane (CFC-12) $\text{C}_2\text{F}_3\text{Cl}_3$ Trichlorotrifluoroethane (CFC-113) $\text{C}_2\text{F}_4\text{Cl}_2$ Dichlorotetrafluoroethane (CFC-114) $\text{C}_2\text{F}_5\text{Cl}$ Monochloropentafluoroethane (CFC-115) All isomers of the above chemicals</p> <p>B. Group II: CF_2ClBr Bromochlorodifluoromethane (Halon-1211) CF_3Br Bromotrifluoromethane (Halon-1301) $\text{C}_2\text{F}_4\text{Br}_2$ Dibromotetrafluoroethane (Halon-2402) All isomers of the above chemicals</p> <p>C. Group III: CF_3Cl Chlorotrifluoromethane (CFC-13) C_2FCl_5 Pentachlorofluoroethane (CFC-111) $\text{C}_2\text{F}_2\text{Cl}_4$ Tetrachlorodifluoroethane (CFC-112) C_3FCl_7 Heptachlorofluoropropane (CFC-211) $\text{C}_3\text{F}_2\text{Cl}_6$ Hexachlorodifluoropropane (CFC-212) $\text{C}_3\text{F}_3\text{Cl}_5$ Pentachlorotrifluoropropane (CFC-213) $\text{C}_3\text{F}_4\text{Cl}_4$ Tetrachlorotetrafluoropropane (CFC-214) $\text{C}_3\text{F}_5\text{Cl}_3$ Trichloropentafluoropropane (CFC-215) $\text{C}_3\text{F}_6\text{Cl}_2$ Dichlorohexafluoropropane (CFC-216) $\text{C}_3\text{F}_7\text{Cl}$ Chloroheptafluoropropane (CFC-217) All isomers of the above chemicals</p> <p>D. Group IV: CCl_4 Carbon Tetrachloride</p> <p>E. Group V: $\text{C}_2\text{H}_3\text{Cl}_3$ 1,1,1 Trichloroethane (Methyl chloroform) All isomers of the above chemical except 1,1,2-trichloroethane</p> <p>F. Group VI: CH_3Br Bromomethane (Methyl Bromide)</p> <p>H. Group VIII: CH_2BrCl (Chlorobromomethane)</p>	<p>G. Group VII: CHFBr_2 CHF_2Br (HBFC-2201) CH_2FBr C_2HFBr_4 $\text{C}_2\text{HF}_2\text{Br}_3$ $\text{C}_2\text{HF}_3\text{Br}_2$ $\text{C}_2\text{HF}_4\text{Br}$ $\text{C}_2\text{H}_2\text{FBr}_3$ $\text{C}_2\text{H}_2\text{F}_2\text{Br}_2$ $\text{C}_2\text{H}_2\text{F}_3\text{Br}$ $\text{C}_2\text{H}_2\text{FBr}_2$ $\text{C}_2\text{H}_3\text{F}_2\text{Br}$ $\text{C}_2\text{H}_4\text{FBr}$ C_3HFBr_6 $\text{C}_3\text{HF}_2\text{Br}_5$ $\text{C}_3\text{HF}_3\text{Br}_4$ $\text{C}_3\text{HF}_4\text{Br}_3$ $\text{C}_3\text{HF}_5\text{Br}_2$ $\text{C}_3\text{HF}_6\text{Br}$ $\text{C}_3\text{H}_2\text{FBr}_5$ $\text{C}_3\text{H}_2\text{F}_2\text{Br}_4$ $\text{C}_3\text{H}_2\text{F}_3\text{Br}_3$ $\text{C}_3\text{H}_2\text{F}_4\text{Br}_2$ $\text{C}_3\text{H}_2\text{F}_5\text{Br}$ $\text{C}_3\text{H}_3\text{FBr}_4$ $\text{C}_3\text{H}_3\text{F}_2\text{Br}_3$ $\text{C}_3\text{H}_3\text{F}_3\text{Br}_2$ $\text{C}_3\text{H}_3\text{F}_4\text{Br}$ $\text{C}_3\text{H}_4\text{FBr}_3$ $\text{C}_3\text{H}_4\text{F}_2\text{Br}_2$ $\text{C}_3\text{H}_4\text{F}_3\text{Br}$ $\text{C}_3\text{H}_5\text{FBr}_2$ $\text{C}_3\text{H}_5\text{F}_2\text{Br}$ $\text{C}_3\text{H}_6\text{FBr}$</p>
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* 40 CFR, Part 82, Appendix A, Subpart A

Table 3
Applicability of NSR to Various Pollutants in
South Coast Air Basin (SOCAB), Salton Sea Air Basin (SSAB),
and Mojave Desert Air Basin (MDAB)

<u>Air Basin</u>	<u>VOC</u>	<u>NO_x</u>	<u>SO_x</u>	<u>CO</u>	<u>PM₁₀</u>	<u>PM_{2.5}</u>	<u>NH₃</u>	<u>Pb</u>	<u>ODC</u>
SOCAB	√	√	√		√	√	√	√	√
SSAB	√	√	√		√		√	√	√
MDAB	√	√	√		√		√	√	√

PERMIT ACTIONS SUBJECT TO NSR, PSD AND BACT

South Coast AQMD's NSR and PSD regulations are preconstruction permit review programs that require the Executive Officer to deny a permit to construct unless the proposed equipment includes BACT when:

- new equipment is installed;
- existing stationary permitted equipment is relocated; or
- existing permitted equipment is modified such that there is an emission increase.

If the new equipment is to replace the same kind of equipment, NSR⁴ still requires BACT unless it is an identical replacement, which does not require a new permit according to *Rule 219 -Equipment Not Requiring a Written Permit Pursuant to Regulation II*.

BACT is not required for a change of operator, provided the facility is a continuing operation at the same location, without modification or change in operating conditions.

In case of relocation of a non-major facility, the facility operator may opt out of installing MSBACT, provided that the owner/operator meets the conditions specified in Rule 1302 (ai) and Rule 1306 (d)(3).⁵

PSD applies to GHG if the source is otherwise subject to PSD for another regulated NSR pollutant and the source is new with a GHG PTE $\geq 75,000$ tons per year CO₂e, or an existing source with a modification resulting in a similar GHG emissions increase.

It is South Coast AQMD policy that BACT is required only for emission increases greater than or equal to one (1.0) pound per day.

In accordance with policy established by South Coast AQMD's Engineering and Permitting division in June 2018, for the purpose of preventing circumvention of triggering a BACT requirement, a period of 5 years prior to the date of application submittal shall be used to accumulate all previous permitting actions allowing emission increases for that specific permit unit to determine if emission increases exceed or

⁴ See Rules 1303(a) and 1304(a).

⁵ U.S._EPA has expressed concerns with this provision of the NSR Rules for minor polluting facilities as of September 2000. Staff will continue to work with U.S._EPA to resolve this issue.

equal 1.0 pound per day for any nonattainment air contaminant, any ozone depleting compound, or ammonia.

LIMITED BACT EXEMPTION

Rule 1304 (Exemptions) was amended in November 2021 to add subdivision (f) to include a limited BACT exemption for RECLAIM and former RECLAIM facilities. This limited BACT exemption is available to new or modified permit units located at a RECLAIM or former RECLAIM facility, for PM₁₀ and SO_x emission increases associated with the installation or modification of add-on air pollution control equipment for controlling NO_x emissions to comply with NO_x Best Available Retrofit Control Technology (BARCT) emission limits. The objective of the proposed narrow BACT exemption is to address the co-pollutant issue associated with the installation or modification of add-on air pollution controls and the replacement of equipment that is combined with an installation or modification of add-on air pollution control required to transition NO_x RECLAIM facilities. This limited BACT exemption is available only to projects at qualified facilities that meet all the requirements listed under Rule 1304 subparagraphs (f)(1)(A) through (E) ⁶.

CALCULATION PROCEDURES FOR EMISSION INCREASES

The calculation procedures for determining whether there is an increase in emissions from an equipment modification that triggers BACT are different for NO_x and SO_x pollutants from RECLAIM facilities than for all other cases. In general, the calculation procedures for RECLAIM facilities are less likely to result in an emission increase that requires BACT.

For NO_x and SO_x emissions from a source at a RECLAIM facility, there is an emission increase if the maximum hourly potential to emit is greater after the modification than it was before the modification.⁷

For modifications subject to Regulation XIII, there are two possible cases⁸:

1. If the equipment was previously subject to NSR, an emission increase occurs if the new potential to emit in one day is greater than the previous potential to emit in one day.
2. If the equipment was never previously subject to NSR, an emission increase occurs if the new potential to emit in one day exceeds the actual average daily emissions over the two-year period, or other appropriate period, prior to the permit application date. However, for the installation of air pollution controls on any source constructed prior to the adoption of the NSR on October 8, 1976 for the sole purpose of reducing emissions, Rule 1306(f) allows the emission change to be calculated as the post-modification potential to emit minus the pre-modification potential to emit.

⁶ See Rule 1304 (f).

⁷ See Rule 2005(d) [and Engineering Policy & Procedures dated 8/7/2019](#).

⁸ See Rule 1306(d)(2).

The potential to emit is based on permit conditions that directly limit the emissions, or, if there are none, then the potential to emit is based on:

- maximum rated capacity; and
- the maximum daily hours of operation; and
- the physical characteristics of the materials processed.

Chapter 4 - What is BACT?

This chapter explains the definitions of BACT found in South Coast AQMD rules, state law and federal law.

NSR RULES (REGULATION XIII)

New sources, relocations, and modifications of existing sources that increase nonattainment air contaminant emissions are subject to New Source Review (NSR) regulations which require BACT, among other requirements. Both federal and state laws require this strategy. The federal Clean Air Act (CAA) requirement for Lowest Achievable Emission Rate (LAER) is implemented through BACT in the South Coast AQMD. Federal LAER applies to major sources only. Although federal LAER applies to any emissions increase at a major stationary source of ozone precursors, South Coast AQMD has interpreted this provision as a 1.0 lb/day increase in emissions from all sources subject to NSR. According to South Coast AQMD's rules, BACT requirements may not be less stringent than federal LAER for major polluting facilities. The California Health & Safety Code (H&SC) Section 40405 defines state BACT similar to federal LAER and requires the application of BACT for all new and modified permitted sources subject to NSR.

PSD RULES (REGULATION XVII)

New sources, relocations, and modifications of existing sources that emit attainment air contaminant emissions and certain other specified pollutants are subject to Prevention of Significant Deterioration (PSD) regulations, which require BACT. Pursuant to Rule 1701, the BACT requirement applies to a net emission increase from a permit unit located at minor and major stationary sources. The intention of the PSD requirement is to implement a similar requirement as Regulation XIII to maintain national ambient air quality standards for attainment air contaminants.

DEFINITION OF BACT

Definitions of BACT are found in: Rule 1302 -*Definitions of Regulation XIII - New Source Review*, which applies to all cases in general, except for Rule 1702 – *Definitions*, which applies only to attainment air contaminants, and Rule 2000 - *General*, which applies to NO_x and SO_x emissions from RECLAIM facilities. While the definitions are not identical, they are essentially the same. Section (h) of Rule 1302 - *Definitions* defines BACT as:

BEST AVAILABLE CONTROL TECHNOLOGY (BACT) means the most stringent emission limitation or control technique which:

- (1) *has been achieved in practice for such category or class of source; or*
- (2) *is contained in any state implementation plan (SIP) approved by the United States Environmental Protection Agency (EPA) for such category or class of source. A specific limitation or control technique shall not apply if the owner or operator of the proposed source*

- (3) *demonstrates to the satisfaction of the Executive Officer or designee that such limitation or control technique is not presently achievable; or is any other emission limitation or control technique, found by the Executive Officer or designee to be technologically feasible for such class or category of sources or for a specific source, and cost-effective as compared to measures as listed in the Air Quality Management Plan (AQMP) or rules adopted by the South Coast AQMD Governing Board.*

The first two requirements in the BACT definition are required by federal law, as LAER for major sources. The third part of the definition is unique to South Coast AQMD and some other areas in California, and allows for more stringent controls than LAER.

Rule 1303(a)(2) requires that economic and technical feasibility be considered in establishing the class or category of sources and the BACT requirements for non-major polluting facilities.

REQUIREMENTS OF HEALTH & SAFETY CODE SECTION 40440.11

Senate Bill 456 (Kelley) was chaptered into state law in 1995 and became effective in 1996. H&SC Section 40440.11 specifies the criteria and process that must be followed by the South Coast AQMD to update its BACT Guidelines to establish more stringent BACT limits for listed source categories. After consultation with the affected industry, the CARB, and the U.S. EPA, and considerable legal review and analysis, staff concluded that the process specified in SB 456 to update the BACT Guidelines should be interpreted to apply only if the South Coast AQMD proposes to make BACT more stringent than LAER or to establish BACT for non-major sources. This is because the CAA requires the South Coast AQMD staff to apply current LAER for major polluting facilities, even if the proposed LAER determination has not gone through the SB456 process. Therefore, the SB 456 requirements do apply to BACT requirements for non-major polluting facilities, but do not apply to federal LAER determinations for major polluting facilities.

CLEAN FUEL GUIDELINES

In January 1988, the South Coast AQMD Governing Board adopted a Clean Fuels Policy that included a requirement to use clean fuels as part of BACT. The implementation of this policy is further described in Parts A and C of these guidelines.

Chapter 5 - Review of Staff BACT Determinations

New BACT determinations and guideline updates proposed by South Coast AQMD staff are subject to public notification requirements. In addition to allowing the public to comment on these items, the South Coast AQMD has established a BACT Scientific Review Committee (BACT SRC) to review and comment on technical matters of the proposals.

The South Coast AQMD has included provisions for an applicant to request a review of particular circumstances regarding a permit application and reconsideration of the BACT determination. Additional avenues are available to permit applicants for further review of staff BACT determinations through South Coast AQMD management, BACT Review Committee, Hearing Board, and the Governing Board.

BACT SCIENTIFIC REVIEW COMMITTEE (BACT SRC)

The BACT SRC was established as a standing committee by action of the South Coast AQMD Governing Board on September 8, 1995 to enhance the public participation process and include technical review and comments by a focused committee at periodic intervals, prior to the updates of the South Coast AQMD BACT Guidelines. A 30-day notice period applies for the BACT SRC and interested persons to review and comment on South Coast AQMD BACT determinations that result in BACT requirements that are more stringent than previously imposed. BACT SRC members, include but are not limited to, representatives from CARB, U.S. EPA, neighboring Air Pollution Control Districts (APCD), with the balance of the committee created by invitation of recognized experts from industry, public utilities, suppliers of air pollution control equipment and advocacy groups. Whenever a committee member resigns or is no longer able to serve, South Coast AQMD seeks out an appropriate replacement to join the committee. A list of current BACT SRC members can be accessed at

[Scientific Review Committee \(aqmd.gov\)](http://aqmd.gov).

The overall purpose of the BACT Scientific Review Committee is to:

- Comment on proposed new and more stringent BACT determinations in permit applications under 30-day public review.
- Comment on proposed BACT listings for all parts of the BACT Guidelines.

Except for the above, the BACT SRC's purpose is not to comment on past permitting decisions or change them. Specifically, the role of the BACT SRC is to review and comment in writing on the appropriateness of new BACT determinations under 30-Day public review. During this comment period, South Coast AQMD, State, and Federal required permit issuance timelines are still in effect. South Coast AQMD BACT staff will commit to sending the BACT SRC newly proposed BACT listings at least seven days prior to the next scheduled BACT SRC meeting. Meetings will typically consist of a presentation by BACT Team (BACTTeam@aqmd.gov) staff of new BACT forms and technical data and a general discussion of the proposed BACT listings, as well as addressing any preliminary written comments received from the public and BACT SRC prior to the meeting. South Coast AQMD staff will respond in writing to preliminary

comments about new BACT proposals within thirty days of the subject BACT SRC meeting. New issues raised during the BACT SRC meetings regarding newly proposed BACT listings will be addressed at the subsequent BACT SRC meeting to allow time for South Coast AQMD staff to research the comments. South Coast AQMD Engineering staff may also respond to specific issues raised at the following BACT SRC meeting.

In addition to newly proposed BACT listings, the BACT SRC will be tasked with reviewing and commenting on updates to the policy and procedure sections of the BACT Guidelines prior to the guidelines being presented to the South Coast AQMD Governing Board for approval.

MEETING WITH SOUTH COAST AQMD MANAGEMENT

South Coast AQMD management, starting with the Senior Engineering Manager of the permitting team, can consider unique and site-specific characteristics of an individual permit. The allowance for site-specific characteristics has been designed into the guidelines and can be reviewed with the manager of the section processing the permit. It is also possible to request review at the next level, with the Assistant Deputy Executive Officer of Engineering and [Permitting/Compliance](#). The Senior Engineering Managers and the Assistant Deputy Executive Officers are empowered to make case-by-case decisions on an individual permit. Further review can be obtained through a meeting with the Deputy Executive Officer (DEO) of Engineering and Permitting. Ultimately, all permitting decisions are the responsibility of the Executive Officer.

THE BACT REVIEW COMMITTEE

Beyond meetings with South Coast AQMD management, an applicant may also request, prior to permit issuance or denial, that the proposed BACT for an individual permit be reviewed by the BACT Review Committee (BRC). The BRC is composed of five senior-level South Coast AQMD officials - the DEO of Legislative, Public Affairs/Media Office; the DEO of Science and Technology Advancement; the DEO of Engineering and Permitting; the DEO of Planning, Rule Development and Implementation; and General Counsel. This committee can review pending individual applications and decide if the BACT determination is appropriate. The BRC can be accessed without any fee or legal representation, and will meet upon demand.

THE SOUTH COAST AQMD HEARING BOARD

After the permit is issued or denied, the applicant can seek further independent review of an individual BACT determination through the South Coast AQMD Hearing Board. In order to access this venue, the permit applicant would need to submit a petition and fee to appeal the final BACT determination by South Coast AQMD (once the permit is denied or issued)⁹. The Hearing Board is an independent, quasi-judicial body composed of five members, who can review a permitting decision by the Executive Officer. In this venue, legal counsel represents the South Coast AQMD. Although not required, many petitioners choose to have legal counsel to represent their position.

⁹ Applicants must file an appeal petition with the Hearing Board within thirty days of the receipt of the permit or the notification of permit denial. See Rule 216 - *Appeals*, Regulation V - *Procedure Before the Hearing Board*, and Rule 303 - *Hearing Board Fees* for more information.

THE SOUTH COAST AQMD GOVERNING BOARD

Any applicant may petition the South Coast AQMD Governing Board to review a pending application pursuant to South Coast AQMD Regulation XII and Health and Safety Code Section 40509. While the Governing Board has the authority to hear and consider any pending permit application, it has rarely done so. It is important to note that this action must be taken while the permit application is pending with staff. Once staff reaches its decision, the only avenue of appeal is through the Hearing Board and ultimately to court.

**PART A - POLICY AND PROCEDURES
FOR MAJOR POLLUTING FACILITIES**

Chapter 1 - How is LAER Determined for Major Polluting Facilities?

This chapter explains the criteria used for determining LAER¹ and the process for updating Part B of the BACT Guidelines for major polluting facilities.

CRITERIA FOR DETERMINING LAER FOR MAJOR POLLUTING FACILITIES

South Coast AQMD staff determines LAER requirements on a permit-by-permit basis based on the definition of LAER. In essence, LAER is the most stringent emission limit or control technology for a class or category of source that is:

- found in a state implementation plan (SIP) pursuant to Health and Safety Code Section 40405(a)(1), or
- achieved in practice (AIP), or
- is technologically feasible and cost effective.

For practical purposes, at this time, nearly all South Coast AQMD LAER determinations will be based on AIP LAER because it is generally more stringent than LAER based on SIP, and because state law constrains South Coast AQMD in using the third approach, as such a determination must go through the SB456 process, which may take more time than allowed for the permit decision.

Based on Governing Board policy, LAER also includes a requirement for the use of clean fuels. Terms such as “achieved in practice” and “technologically feasible” have not been defined in the rule, so the purpose of this section is to explain the criteria South Coast AQMD permitting staff uses to make a LAER determination.

LAER Based on a SIP

The most stringent emission limit found in an approved state implementation plan (SIP) might be the basis for LAER. This means that the most stringent emission limit adopted by any state as a rule, regulation or permit², and approved by U.S. EPA, is eligible as a LAER requirement. No other parameters are required to be evaluated when this category is chosen. This does not include future emission limits that have not yet been implemented.

¹ In order to distinguish between BACT for major polluting facilities and BACT for minor polluting facilities, this document uses the term LAER when referring to BACT for major polluting facilities.

² Some states incorporate individual permits into their SIP as case-by-case Reasonably Available Control Technology requirements.

Achieved in Practice LAER

Regulatory Documents

An emission limit or control technology may be considered achieved in practice (AIP) for a category or class of source if it exists in any of the following regulatory documents or programs:

- South Coast AQMD BACT Guidelines
- CAPCOA BACT Clearinghouse
- U.S. EPA RACT/BACT/LAER Clearinghouse
- Other districts' and states' BACT Guidelines
- BACT/LAER requirements in New Source Review permits issued by South Coast AQMD or other agencies

However, staff will check with the permitting authority (other than South Coast AQMD) on the status of the BACT or LAER requirement. If it is found that an emission limit is not being achieved or a control technology is not performing as expected in the equipment referenced in any of the above sources or in other equipment used as the basis for the BACT or LAER determination, then it will not be considered as AIP.

New Technologies/Emission Levels

New technologies and innovations of existing technologies occasionally evolve without a regulatory requirement, but still deserve consideration. They may have been voluntarily installed to reduce emissions, and may or may not be subject to an air quality permit or an emission limit. Therefore, in addition to the above means of being determined as AIP, a control technology or emission limit may also be considered as AIP if it meets all the following criteria:

Commercial Availability

At least one vendor must offer this equipment for regular or full-scale operation in the United States. A performance warranty or guaranty must be available with the purchase of the control technology, as well as parts and service.

Reliability

All control technologies must have been installed and operated reliably for at least six months. If the operator did not require the basic equipment to operate daily, then the equipment must have at least 183 cumulative days of operation. During this period, the basic and/or control equipment must have operated: 1) at a minimum of 50% design capacity; or 2) in a manner that is typical of the equipment in order to provide an expectation of continued reliability of the control technology.

Effectiveness

The control technology must be verified to perform effectively over the range of operation expected for that type of equipment. If the control technology will be allowed to operate at lesser effectiveness during certain modes of operation, then those modes of operation must be identified. The verification shall be based on a performance test or tests deemed to be acceptable by South Coast AQMD, when possible, or other performance data.

Technology Transfer

LAER is based on what is AIP for a category or class of source. However, U.S. EPA guidelines require that technology that is determined to be AIP for one category of source be considered for transfer to other source categories. There are two types of potentially transferable control technologies: 1) exhaust stream controls, and 2) process controls and modifications. For the first type, technology transfer must be considered between source categories that produce similar exhaust streams. For the second type, technology transfer must be considered between source categories with similar processes.

Federal PM_{2.5} New Source Review and South Coast AQMD Rule 1325

PM_{2.5} NSR applies to a new major polluting facility, major modifications to a major polluting facility, and any modification to an existing facility that would constitute a major polluting facility. A major polluting facility would be a facility located in areas federally designated pursuant to 40 CFR 81.305 as non-attainment for PM_{2.5} for the South Coast Air Basin (SOCAB) which has actual emissions of, or the potential to emit, 70 tons or more per year of PM_{2.5}, or its precursors for serious areas. For major modifications, LAER applies on a pollutant-specific basis to emissions of PM_{2.5} and its precursors, for which (1) the source is major, (2) the modification results in a significant increase, and (3) the modification results in a significant net emissions increase.

Significant means in reference to a net emissions increase or the potential of a source to emit any of the following pollutants, a rate of emissions that would equal or exceed any of the following rates³:

Nitrogen oxides:	40 tons per year
Sulfur dioxide:	40 tons per year
Volatile organic compound (VOC):	40 tons per year ⁴
PM _{2.5} :	10 tons per year
Ammonia:	40 tons per year ⁵

A facility subject to the Federal PM_{2.5} NSR will be required to comply with the following:

- Lowest Achievable Emission Rate (LAER)
- Emission increases offset
- Certification of compliance with Clean Air Act; and
- Analysis conducted of benefits of the proposed project outweigh the environmental and social costs associated with that project.

Please refer to South Coast AQMD Rule 1325 for specific requirements.

³ South Coast AQMD Rule 1325(b)(12), as amended on January 4, 2019

⁴ VOC was added to Rule 1325 as a precursor to PM_{2.5} pursuant to EPA's 2016 PM_{2.5} SIP implementation Rule

⁵ Ammonia was added to Rule 1325 as a precursor to PM_{2.5} pursuant to EPA's 2016 PM_{2.5} SIP implementation Rule.

LIMITED BACT EXEMPTION

Rule 1304 - Exemptions was amended in November 2021 to add subdivision (f) to include a limited BACT exemption for RECLAIM and former RECLAIM facilities. This limited BACT exemption is available to new or modified permit unit located at a RECLAIM or former RECLAIM facilities, for PM₁₀ and SO_x emission increases associated with the installation or modification of add-on air pollution control equipment for controlling NO_x emissions to comply with NO_x Best Available Retrofit Control Technology (BARCT) emission limits. The objective of the proposed narrow BACT exemption is to address the co-pollutant issue associated with the installation or modification of add-on air pollution controls and the replacement of equipment that is combined with an installation or modification of add-on air pollution control required to transition NO_x RECLAIM facilities. This limited BACT exemption is available only to projects at qualified facilities that meet all the requirements listed under Rule 1304 subparagraphs (f)(1)(A) through (E) ⁶.

Cost in LAER Determinations

U.S. EPA guidelines do not allow for routine consideration of the cost of control in LAER determinations. However, U.S. EPA guidelines say that LAER is not considered achievable if the cost of control is so great that a new source could not be built or operated with a particular control technology. If a facility in the same or comparable industry already uses the control technology, then such use constitutes evidence that the cost to the industry is not prohibitive.

State law (H&SC 40405) also defines BACT as the lowest achievable emission rate, which is the more stringent of either (i) the most stringent emission limitation contained in the SIP, or (ii) the most stringent emission limitation that is achieved in practice. There is no explicit reference or prohibition to cost considerations, and the applicability extends to all permitted sources. South Coast AQMD rules implement both state BACT and federal LAER requirements simultaneously, and furthermore specify that South Coast AQMD BACT must meet federal LAER requirements for major polluting facilities.

If a proposed LAER determination results in extraordinary costs to a facility, the applicant may bring the matter to South Coast AQMD management for consideration as described in Overview, Chapter 6.

Special Permitting Considerations

Although the most stringent, AIP LAER for a source category will most likely be the required LAER, South Coast AQMD staff may consider special technical circumstances that apply to the proposed equipment which may allow deviation from that LAER. The permit applicant should bring any pertinent facts to the attention of the South Coast AQMD permitting engineer for consideration.

⁶ See Rule 1304 (f).

Case-Specific Situations

South Coast AQMD staff may consider unusual equipment-specific and site-specific characteristics of the proposed project that would warrant a reconsideration of the LAER requirement for new equipment. Here are some examples of what may be considered.

Technical infeasibility of the control technology

A particular control technology may not be required as LAER if the applicant demonstrates that it is not technically feasible to install and operate it to meet a specific LAER emission limitation in a specific permitting situation.

Operating schedule and project length

If the equipment will operate much fewer hours per year than what is typical, or for a much shorter project length, it can affect what is considered AIP.

Availability of fuel or electricity

Some LAER determinations may not be feasible if a project will be located in an area where natural gas or electricity is not available.

Process requirements

Some LAER determinations specify a particular type of process equipment. South Coast AQMD staff may consider requirements of the proposed process equipment that would make the LAER determination not technically feasible.

Equivalency

The permit applicant may propose alternative means to achieve the same emission reduction as required by LAER. For example, if LAER requires a certain emission limit or control efficiency to be achieved, the applicant may choose any control technology, process modification, or combination thereof that can meet the same emission limit or control efficiency.

Super Compliant Materials

South Coast AQMD will accept the use of super compliant materials in lieu of an add-on control device controlling VOC emissions from coating operations. For example, if a permit applicant uses only surface coatings that meet the super compliant material definition in South Coast AQMD Rule 109, an add-on control device would not be required for VOC LAER. This policy does not preclude any other LAER requirements for other contaminants.

Equipment Modifications

As a general rule, it is more difficult to retrofit existing equipment with LAER as a result of NSR modification when compared to a new source. The equipment being modified may not be compatible with some past LAER determinations that specify a particular process type. There may also be space restrictions that prevent installation of some add-on control technology.

Other Considerations

Although multiple process and control options may be available during the LAER determination process, considerations should be made for options that reduce the formation of air contaminants from the process, as well as ensuring that emissions are properly handled. In addition to evaluating the efficiency of the control stage, these additional considerations are needed to ensure that the system is capable of reducing or eliminating emissions from the facility on a consistent basis during the operational life of the equipment.

Pollution Prevention

The Pollution Prevention Act of 1990 (42 U.S.C. §§13101-13109) established a national policy that pollution should be prevented or reduced at the source whenever feasible. In many cases, air pollution control is a process that evaluates contaminants at the exhaust of the system. Pollution prevention is the reduction or elimination of waste at the source by the modification of the production process. Pollution prevention measures may consist of the use of alternate or reformulated materials, a modification of technology or equipment, or improvement of energy efficiency changes that result in an emissions reduction. These measures should be considered as part of the LAER determination process if the measures will result in the elimination or reduction of emissions, but are not required to include projects which are considered to fundamentally redefine the source. New and different emissions created by a process or material change will also need to be considered as part of the LAER determination process, in contrast to the overall emissions reductions from the implementation of pollution prevention measures. U.S. EPA policy defined pollution prevention as source reduction and other practices that reduce or eliminate the creation of pollutants through increased efficiency in the use of raw materials, energy, water, or other resources, and protection of natural resources by conservation⁷. U.S. EPA further specifies that pollution prevention does not include recycling (except in-process recycling), energy recovery, treatment or disposal. For purposes of these BACT Guidelines, and to be consistent with federal definitions, source reduction and pollution prevention may include, but not be limited to, a consideration of the feasibility of:

- equipment or technology modifications,
- process or procedure modifications,
- reformulation or redesign of products,
- substitution of raw materials, or
- improvements in housekeeping, maintenance or inventory control,

that reduce the amount of air contaminants entering any waste stream or otherwise released into the environment, including fugitive emissions.

Monitoring and Testing

In order to ensure that LAER determinations continue to meet their initial emission and efficiency standards, periodic or continuous parameter monitoring and testing requirements may be required during the permitting process. Equipment and processes may experience some change over time, due to aging or operational methods of the

⁷ U.S. EPA Pollution Prevention Law and Policies (www.epa.gov/p2/pollution-prevention-law-and-policies#define)

equipment, which may affect emission rates or control efficiencies. In addition to other rule requirements, additional monitoring and testing requirements may need to focus on aspects directly related to the BACT determination, and may be made enforceable by permit conditions. Monitoring and testing requirements should be specific to characterize operating conditions (e.g. temperatures, pressures, flows, production rates) and measurement techniques when LAER is established to ensure clarity and consistency with the standard.

Capture Efficiency

An integral part of controlling air pollutants emitted from a process with add-on air pollution control equipment is capturing those emissions and directing them to the air pollution control device. Emissions which are designed to be collected by an exhaust system but are vented uncontrolled into the atmosphere can have a much greater impact than controlled emissions. When applicable, the evaluation of a process and its associated control equipment should address the qualification and quantification of capture efficiency. By addressing capture efficiency during LAER determinations, a standard can be established to evaluate the capture efficiency of other systems, as well as ensure that the capture efficiency is maintained consistently over time.

If applicable, LAER determinations may include the percentage capture efficiency and the methods and measurements (e.g. EPA Method 204, capture velocity measurements, design using ACGIH's Industrial Ventilation, static pressures) used to determine and verify it. For various circumstances, several South Coast AQMD rules (Table 4) already require an assessment of collection efficiency of an emission control system following EPA Method 204, EPA's "Guidelines for Determining Capture Efficiency", South Coast AQMD's "Protocol for Determination of Volatile Organic Compounds (VOC) Capture Efficiency," or other methods approved by the Executive Officer, and are appropriate to include as LAER requirements. The capture efficiency for any LAER Determination shall be no less stringent than any applicable rule requirement. Other considerations that may affect capture, such as cross-drafts, thermal drafts and the volume of combustion products, should also be addressed during this process.

Table 4
South Coast AQMD Regulation XI and XIV Rules with Capture Efficiency Requirements or Considerations

- | | | | | |
|--------|----------|----------|--------|----------|
| • 1103 | • 1125 | • 1136 | • 1162 | • 1420.1 |
| • 1104 | • 1126 | • 1141 | • 1164 | • 1420.2 |
| • 1106 | • 1128 | • 1141.2 | • 1171 | • 1425 |
| • 1107 | • 1130 | • 1144 | • 1175 | • 1469 |
| • 1115 | • 1130.1 | • 1145 | • 1178 | • 1469.1 |
| • 1122 | • 1131 | • 1155 | • 1407 | |
| • 1124 | • 1132 | • 1156 | • 1420 | |

LAER APPLICATION CUT-OFF DATES

For applications submitted by major polluting facilities, LAER requirements will be determined based on information available up to the date the permit to construct is issued.

This requirement allows interested parties to comment on possible technologies that could provide lower emissions.

Applications for a Registration Permit for equipment issued a valid Certified Equipment Permit (CEP), which is valid for one year, will only be required to comply with LAER as determined at the time the CEP was issued. However, South Coast AQMD staff will reevaluate the LAER requirements for the CEP upon renewal of the Title V permit.

LAER UPDATE PROCESS

South Coast AQMD will update Section I – South Coast AQMD LAER/BACT Determinations of Part B of the BACT Guidelines on an ongoing basis with actual LAER determinations for South Coast AQMD permits issued to major polluting facilities. The process will depend on whether or not the LAER requirement is more stringent than previous South Coast AQMD LAER determinations for the same equipment category.

When South Coast AQMD permitting staff makes a LAER determination that is no more stringent than previous South Coast AQMD LAER determinations, the permitting team will issue the permit and forward information regarding this LAER determination to the BACT Team.⁸ The BACT Team will review this LAER determination with the BACT SRC prior to listing in the BACT Guidelines.

Whenever permitting staff makes a LAER determination that is more stringent than what South Coast AQMD has previously required as LAER, the permit to construct may be subject to a public review. In any event depending on Rule 212, the permitting team will forward the preliminary LAER determination to the BACT Team, who will prepare and send a public notice of the preliminary determination to the BACT SRC, potentially interested persons, and anyone else requesting the information. Staff will consider all comments filed during the 30-day review period before making a permit decision. Staff will make every effort to conduct the public review consistent with the requirements of state law. However, if the 30-day review period conflicts with the deadline of the Permit Streamlining Act⁹ for issuing the permit, the permit will be issued in accordance with state law. The 30-day public review may also be done in parallel with other public reviews mandated by *Rule 212 - Standards for Approving Permits and Issuing Public Notice or Regulation XXX - Title V Permits* in applicable cases.

On a periodic basis, the South Coast AQMD BACT Team will provide standing status reports to the South Coast AQMD Governing Board's Stationary Source Committee and to the Governing Board.

In summary, as technology advances, many categories in the South Coast AQMD's BACT Guidelines will be updated with new listings. This on-going process will reflect new lower emitting technologies not previously identified in the Guidelines.

CLEAN FUEL GUIDELINES

In January 1988, the South Coast AQMD Governing Board adopted a Clean Fuels Policy that included a requirement to use clean fuels as part of BACT/LAER. A clean fuel is one that produces air emissions equivalent to or lower than natural gas for NO_x, SO_x, ROG, and fine respirable particulate matter (PM₁₀). Besides natural gas, other clean fuels are

⁸ To reduce the burden on South Coast AQMD of preparing hundreds of LAER Determination Forms each month, forms will not be prepared for routine LAER determinations after Part B, Section I of the guidelines has sufficient entries to demonstrate typical LAER requirements.

⁹ The requirements of the Permit Streamlining Act are also found in South Coast AQMD's Rule 210.

liquid petroleum gas (LPG), hydrogen and electricity. Utilization of zero and near-zero emission technologies are also integrated into the Clean Fuels Policy. The burning of landfill, digester, refinery and other by-product gases is not subject to the clean fuels requirement. However, the combustion of these fuels must comply with other South Coast AQMD rules, including the sulfur content of the fuel.

The requirement of a clean fuel is based on engineering feasibility. Engineering feasibility considers the availability of a clean fuel and safety concerns associated with that fuel. Some state and local safety requirements limit the types of fuel, which can be used for emergency standby purposes. Some fire departments or fire marshals do not allow the storage of LPG near occupied buildings. Fire officials have, in some cases, vetoed the use of methanol in hospitals. If special handling or safety considerations preclude the use of the clean fuel, the South Coast AQMD has allowed the use of fuel oil as a standby fuel in boilers and heaters, fire suppressant pump engines and for emergency standby generators. The use of these fuels must meet the requirements of South Coast AQMD rules limiting NO_x and sulfur emissions.

AIR QUALITY-RELATED ENERGY POLICY

In September 2011, the South Coast AQMD Governing Board adopted an air quality-related energy policy to help guide a unified approach to reducing air pollution while addressing other key environmental concerns including environmental justice, climate change and energy independence. The air quality-related energy policy outlines 10 policies and 10 action steps to help meet federal health-based standards for air quality in the South Coast Air Basin while also promoting the development of zero- and near-zero emission technologies.

Policy 7 is to require any new/repowered in-Basin fossil-fueled generation power plant to incorporate BACT/LAER as required by South Coast AQMD rules, considering energy efficiency for the application. These power plants will need to comply with any requirements adopted by the California Air Resources Board, California Energy Commission, Public Utilities Commission, California Independent System Operator, or the governing board of a publicly-owned electric utility, as well as state law under the California Environmental Quality Act. In recognizing that fossil fuel electric generation will still be needed in the Basin to complement projected increased use of renewable energy sources, this policy ensures that all fossil-fueled plants will meet existing BACT/LAER requirements and South Coast AQMD's BACT/LAER determinations will also take into consideration generating efficiency in setting the emission limits. Parts E and F of the BACT Guidelines complement and support this policy.

Chapter 2 - How to Use Part B of the BACT Guidelines

This chapter explains the LAER information found in Part B - LAER/BACT Determinations for Major Polluting Facilities. Part B is a listing of LAER/BACT determinations for major polluting facilities contained in South Coast AQMD and other air pollution control agencies' permits, and data on new and emerging technologies. These LAER/BACT determinations and data are guides and will be used, along with other information, to determine LAER as outlined in Chapter 1. For a listing of equipment types, refer to the List of Equipment Categories. LAER determination for equipment not found in Part B of the BACT Guidelines is done according to the process outlined in Chapter 1.

GENERAL

Part B is divided into three sections. Section I – South Coast AQMD LAER/BACT Determinations, ~~contains~~ includes information on LAER/BACT determinations contained in permits issued by South Coast AQMD, with permit limits based on achieved in practice technology. Section II – Non-AQMD LAER/BACT Determinations, lists LAER/BACT determinations contained in other air pollution control agencies' permits or BACT Guidelines, with permit limits based on achieved in practice technology. Section III – Other Technologies, consists of information on technologies which have been achieved in practice ~~and may be~~ but are not reflected in a permit limit, information on emerging technologies or emission limits which have not yet been achieved in practice ~~but overall have not met all the criteria for achieved in practice~~. All three sections are subdivided based on the attached List of Equipment Categories. Within each category, the LAER/BACT determinations will be listed in order of stringency.

Each listing includes the following information, in addition to other information detailing the description and operation of the equipment:

- Equipment Information

This provides information on the manufacturer, model, description, function, size/dimensions/capacity, combustion sources, and cost of the equipment. Cost data are generally obtained from the South Coast AQMD application forms, manufacturer or owner/operator, and are not verified. It also provides additional information such as fuel type for combustion equipment and equipment information comments that can provide weight of parts cleaned per load for degreasers and the number and size of blowers for spray booths.

- Company Information

This identifies the contact person and owner/operator of the equipment, along with telephone numbers.

- Permit Information

This identifies the permitting agency and the name and telephone number of the agency's contact person. It also provides information on Permits to Construct/Operate. The South Coast AQMD is always the issuing agency for LAER determinations listed in Section I.

- Emission Information

This identifies the actual permit limits and LAER/BACT requirements set forth by the issuing agency for the equipment being evaluated, concise description of the BACT requirements for each regulated contaminant, and basis of the BACT/LAER determination.

- Control Technology

This provides information on the manufacturer, model, description, size/dimensions/capacity, permit information and required control efficiencies on the control technology used to achieve the permit limit and the LAER/BACT requirements.

- Demonstration of Compliance

This provides information such as source test or other method that was used to demonstrate compliance and any monitoring or testing requirements.

- Additional South Coast AQMD Reference Data

This identifies the BCAT (for basic equipment¹⁰), CCAT (for control equipment), RECLAIM and Title V facilities, and source test ID. It also lists applicable South Coast AQMD Regulation XI rules. Additionally, it provides health risk data for the permit unit.

The above information will enable permit applicants to assess the applicability of each LAER/BACT determination to their particular equipment.

The LAER requirements usually found in the LAER Determination listings are in the form of:

- an emission limit;
- a control technology;
- equipment requirements; or
- a combination of the last two

If the requirement is an emission limit, the applicant may choose any control technology to achieve the emission limit. The South Coast AQMD prefers to set an emission limit as LAER because it allows an applicant the most flexibility in reducing emissions. If control technology and/or equipment requirements are the only specified LAER, then either emissions from the equipment are difficult to measure or it was not possible to specify an emission limit that applies to all equipment within the category. Where possible, an emission limit or control efficiency condition will be specified on the permit along with the control technology or equipment requirements to ensure that the equipment is properly operated with the lowest emissions achievable.

¹⁰ Basic equipment is the process or equipment, which emits the air contaminant for which BACT is being determined.

HOW TO DETERMINE LAER

The Part B LAER determinations are only examples of LAER determinations for equipment that have been issued permits or that have been demonstrated in practice. As described in Chapter 1, LAER is determined on a case-by-case basis. To find out what LAER is likely to be for a particular equipment, the applicant should review the Part B LAER determinations found at the South Coast AQMD website www.aqmd.gov/home/permits/bact. The CAPCOA Clearinghouse maintained by the California Air Resources Board and the U.S. EPA RACT/BACT/LAER Clearinghouse should also be reviewed. These compendiums contain information from other districts, local agencies, and states that may not be included in the South Coast AQMD BACT Guidelines. Finally, the South Coast AQMD permitting staff may be contacted to discuss LAER prior to submitting a permit application.

As described in Chapter 1, the permit applicant should bring to the attention of the South Coast AQMD permitting engineer any special permitting considerations that may affect the LAER determination.

ATTACHMENT D



Section II – Other LAER/BACT Determination

Source Type: **Major/LAER**
 Application No.: **N-8044-4-0**
 Equipment Category: **Boiler**
 Equipment Subcategory: **Natural Gas**
> 20 MMBTU/HR
 Date: **February 2, 2024**

1. EQUIPMENT INFORMATION

A. MANUFACTURER: Cleaver Brooks		B. MODEL: CBEX-E 700-722-250ST	
C. DESCRIPTION: Cleaver Brooks model CBEX-E 700-722-250ST natural gas-fired boiler equipped with a CBEX Elite low NOx burner system and Umicore model DNX-1029 Selective Catalytic Reduction (SCR) system.			
D. FUNCTION: Boiler provides steam for process use in corrugated container manufacturing.			
E. SIZE/DIMENSIONS/CAPACITY: 29.47 MMBTU/HR			
COMBUSTION SOURCES			
F. MAXIMUM HEAT INPUT: 29.47 MMBTU/HR			
G. BURNER INFORMATION:			
	TYPE	INDIVIDUAL HEAT INPUT	NUMBER
	Low NOx Burner	29.47 MMBTU/HR	1
H. PRIMARY FUEL: Natural gas		I. OTHER FUEL: N/A	
J. OPERATING SCHEDULE: 24 HRS/DAY 7 DAYS/WEEK 52 WKS/YR			
K. EQUIPMENT COST: N/A			
L. EQUIPMENT INFORMATION COMMENTS: The unit shall only be fired on PUC-quality natural gas.			

2. COMPANY INFORMATION

A. COMPANY: Pacific Southwest Container, LLC		B. FAC ID:	
C. ADDRESS: 671 Mariposa Rd. CITY: Modesto STATE: CA ZIP: 95354		D. NAICS CODE: 322211	
E. CONTACT PERSON: Mac McCullough		F. TITLE:	
G. PHONE NO.: (209) 604-6815		H. EMAIL: macm@teampsc.com	

3. PERMIT INFORMATION

A. AGENCY: San Joaquin Valley Air Pollution Control District	B. APPLICATION TYPE: NEW CONSTRUCTION
C. SCAQMD ENGINEER: SJVAPCD Engineer: James Harader	
D. PERMIT INFORMATION: PC ISSUANCE DATE: P/O NO.: N-8044-4-2 PO ISSUANCE DATE: 9/21/2018	
E. START-UP DATE: 5/7/2019	
F. OPERATIONAL TIME: Over 3 years	

4. EMISSION INFORMATION

A. BACT EMISSION LIMITS AND AVERAGING TIMES: -						
	VOC	NOx	SOx	CO	PM OR PM₁₀	INORGANIC
BACT Limit		2.5 PPMV 0.0030 lb/MMBtu		50 PPMV 0.037 lb/MMBtu		
Averaging Time		15 minutes		15 minutes		
Correction		3% O ₂		3% O ₂		
B. OTHER BACT REQUIREMENTS: There is a 10 ppmv ammonia slip limit, the source test shows the ammonia slip limit is 2.8 ppm. The current South Coast AQMD ammonia slip BACT is 5 ppmv.						
C. BASIS OF THE BACT/LAER DETERMINATION: Achieved in Practice/New Technology						
D. EMISSION INFORMATION COMMENTS: Although not a part of this BACT determination, the following limits are included in the permit: SOx – 0.00285 lb/MMBtu PM ₁₀ – 0.003 lb/MMBtu VOC – 0.0055 lb/MMBtu NH ₃ – 10 PPMVD @ 3% O ₂						

5. CONTROL TECHNOLOGY

A. MANUFACTURER: UMICORE		B. MODEL: DNX-1029	
C. DESCRIPTION: Selective Catalytic Reduction (SCR) system. The DNX® catalyst is a fiber reinforced Vanadium-Tungsten-Titania catalyst.			
D. SIZE/DIMENSIONS/CAPACITY: -			
E. CONTROL EQUIPMENT PERMIT INFORMATION: APPLICATION NO.: N-8044-4-0 PC ISSUANCE DATE: PO NO.: N-8044-4-2 PO ISSUANCE DATE: 9/21/2018			
F. REQUIRED CONTROL EFFICIENCIES: N/A			
CONTAMINANT	OVERALL CONTROL EFFICIENCY	CONTROL DEVICE EFFICIENCY	COLLECTION EFFICIENCY
VOC	___%	___%	___%
NO _x	___%	___%	___%
SO _x	___%	___%	___%
CO	___%	___%	___%
PM	___%	___%	___%
PM ₁₀	___%	___%	___%
INORGANIC	___%	___%	___%
G. CONTROL TECHNOLOGY COMMENTS: -			

6. DEMONSTRATION OF COMPLIANCE

A. COMPLIANCE DEMONSTRATED BY: Source Test												
B. DATE(S) OF SOURCE TEST: 7/6/2020												
C. COLLECTION EFFICIENCY METHOD: N/A												
D. COLLECTION EFFICIENCY PARAMETERS: N/A												
E. SOURCE TEST/PERFORMANCE DATA:												
<table border="1"> <thead> <tr> <th>Pollutant</th> <th>Average Test Result</th> <th>Emission Limit</th> </tr> </thead> <tbody> <tr> <td>NO_x, ppmv @ 3% O₂</td> <td>1.4</td> <td>2.5</td> </tr> <tr> <td>CO, ppmv @ 3% O₂</td> <td><0.1</td> <td>50</td> </tr> <tr> <td>NH₃, ppmv @ 3% O₂</td> <td>2.8</td> <td>10</td> </tr> </tbody> </table>	Pollutant	Average Test Result	Emission Limit	NO _x , ppmv @ 3% O ₂	1.4	2.5	CO, ppmv @ 3% O ₂	<0.1	50	NH ₃ , ppmv @ 3% O ₂	2.8	10
Pollutant	Average Test Result	Emission Limit										
NO _x , ppmv @ 3% O ₂	1.4	2.5										
CO, ppmv @ 3% O ₂	<0.1	50										
NH ₃ , ppmv @ 3% O ₂	2.8	10										

F. TEST OPERATING PARAMETERS AND CONDITIONS: Condition 24) All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate.	
G. TEST METHODS (SPECIFY AGENCY):	
Pollutant	Test Method
NOx	EPA Method 7E or ARB Method 100
CO	EPA Method 10 or ARB Method 100
H. MONITORING AND TESTING REQUIREMENTS: Monthly testing for NOx, CO, and O ₂ using a portable analyzer and for NH ₃ using Draeger tubes or a District approved method during each month in which source testing is not performed.	
I. DEMONSTRATION OF COMPLIANCE COMMENTS: Permit Condition 18) Source testing to measure NOx, CO, and NH ₃ emissions during steady state operation from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit.	

7. ADDITIONAL SCAQMD REFERENCE DATA

A. BCAT:		B. CCAT:		C. APPLICATION TYPE CODE:	
D. RECLAIM FAC? YES <input type="checkbox"/> NO <input type="checkbox"/>		E. TITLE V FAC: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		F. SOURCE TEST ID(S):	
G. SCAQMD SOURCE SPECIFIC RULES:					
H. HEALTH RISK FOR PERMIT UNIT					
H1. MICR:		H2. MICR DATE:		H3. CANCER BURDEN:	
H4. CB DATE:		H5. HIA:		H6. HIA DATE:	
H7. HIC:		H8. HIC DATE:			

ATTACHMENT D

Section I - South Coast AQMD LAER/BACT Determination



Source Type: **Major/LAER**
 Application No.: **477619/496862**
 Equipment Category: **Fugitive VOC Emission Sources**
 Equipment Subcategory: **Petroleum Refineries**
 Date: **February 2, 2024**

1. EQUIPMENT INFORMATION

A. MANUFACTURER: N/A	B. MODEL: N/A		
C. DESCRIPTION: All fugitive components in VOC service (liquid with greater than 10% VOC by weight) in Naphtha Hydrodesulfurization Unit, except for pumps, compressors, and drains.			
D. FUNCTION: Petroleum refining process unit.			
E. SIZE/DIMENSIONS/CAPACITY: N/A			
COMBUSTION SOURCES			
F. MAXIMUM HEAT INPUT: N/A			
G. BURNER INFORMATION:			
TYPE	INDIVIDUAL HEAT INPUT	NUMBER	
N/A	N/A	N/A	
H. PRIMARY FUEL: N/A	I. OTHER FUEL: N/A		
J. OPERATING SCHEDULE:	24 HRS/DAY	7 DAYS/WEEK	52 WKS/YEAR
K. EQUIPMENT COST: N/A			
L. EQUIPMENT INFORMATION COMMENTS: N/A			

2. COMPANY INFORMATION

A. COMPANY: Paramount Petroleum Corporation	B. FAC ID: 800183
C. ADDRESS: 14700 Downey Ave. CITY: Paramount STATE: CA ZIP: 90723	D. NAICS CODE: 325199
E. CONTACT PERSON: Kathryn Gleeson	F. TITLE: Manager Env. Compliance
G. PHONE NO.: (562) 748-4613	H. EMAIL: kgleeson@worldenergy.net

3. PERMIT INFORMATION

A. AGENCY: South Coast AQMD	B. APPLICATION TYPE: MODIFICATION
C. SCAQMD ENGINEER: Connie Yee	
D. PERMIT INFORMATION: PC ISSUANCE DATE: 7/25/08 P/O NO.: N/A PO ISSUANCE DATE: *	
E. START-UP DATE: See Section F.	
F. OPERATIONAL TIME: + 10 years *Permit to Operate, G24624, issued under subsequent A/N 496862 on May 2013.	

4. EMISSION INFORMATION

A. BACT EMISSION LIMITS AND AVERAGING TIMES: -						
	VOC	NOx	SOx	CO	PM OR PM₁₀	INORGANIC
BACT Limit	200 PPMV*					
Averaging Time						
Correction						
B. OTHER BACT REQUIREMENTS: * This requirement applies to components in gas/vapor and light liquid service, except for pumps, compressors, and drains.						
C. BASIS OF THE BACT/LAER DETERMINATION: Achieved in Practice/New Technology						
D. EMISSION INFORMATION COMMENTS: Condition S4.2) All new components in VOC services except for pumps, compressors, and drains, a leak* greater than 200 ppm but less than 1,000 ppm measured as methane above background as measured using EPA Method 21, shall be repaired within 14 days of detection. Components shall be defined as any valve, fitting, pressure relief device, diaphragm, hatch, sight-glass, and meter, which are not exempted by Rule 1173. *200 ppm Total Organic Compounds						

5. CONTROL TECHNOLOGY

A. MANUFACTURER: N/A	B. MODEL: N/A		
<p>C. DESCRIPTION: Condition S31.3) The following BACT requirements shall apply to VOC service fugitive components associated with the devices that are covered by Naphtha Hydrodesulfurization Unit: All open-ended lines shall be equipped with cap, blind flange, plug, or a second valve. All pressure relief valves shall be connected to a closed vent system. All new light liquid pumps shall utilize double seals. All compressors shall be equipped with a seal system with a higher-pressure barrier fluid. All new valves in VOC services, except those specifically exempted by Rule 1173 and those in heavy liquid service as defined in Rule 1173, shall be bellows seal valves, except as approved by the District, in the following applications: heavy liquid services, control valve, instrument piping/tubing, application requiring torsional valve stem motion, applications where valve failure could pose safety hazard, retrofits/special applications with space limitation, and valve not commercially available.</p>			
D. SIZE/DIMENSIONS/CAPACITY: N/A			
<p>E. CONTROL EQUIPMENT PERMIT INFORMATION: N/A APPLICATION NO.: - PC ISSUANCE DATE: - PO NO.: - PO ISSUANCE DATE: -</p>			
F. REQUIRED CONTROL EFFICIENCIES: N/A			
CONTAMINANT	OVERALL CONTROL EFFICIENCY	CONTROL DEVICE EFFICIENCY	COLLECTION EFFICIENCY
VOC	___%	___%	___%
NOx	___%	___%	___%
SOx	___%	___%	___%
CO	___%	___%	___%
PM	___%	___%	___%
PM ₁₀	___%	___%	___%
INORGANIC	___%	___%	___%
G. CONTROL TECHNOLOGY COMMENTS: N/A			

6. DEMONSTRATION OF COMPLIANCE

A. COMPLIANCE DEMONSTRATED BY: Monthly or quarterly inspection (see Section 6.H).
B. DATE(S) OF SOURCE TEST: -
C. COLLECTION EFFICIENCY METHOD: -

D. COLLECTION EFFICIENCY PARAMETERS: -
E. SOURCE TEST/PERFORMANCE DATA: Reports of the components inspected in the 3 rd and 4 th quarter of 2022.
F. TEST OPERATING PARAMETERS AND CONDITIONS: -
G. TEST METHODS (SPECIFY AGENCY): EPA Method 21
H. MONITORING AND TESTING REQUIREMENTS: Condition S31.3) All new components in VOC services as defined in Rule 1173, except valves and flanges shall be inspected quarterly using EPA reference Method 21. All new valves and flanges in VOC services except those specifically exempted by Rule 1173 shall be inspected monthly using EPA Method 21.
I. DEMONSTRATION OF COMPLIANCE COMMENTS: Condition S31.3) The operator shall keep records of the monthly inspection (quarterly where applicable), subsequent repair, and reinspection, in a manner approved by the District. Records shall be kept and maintained for at least five years and shall be made available to Executive Officer of his authorized representatives upon request.

7. ADDITIONAL SCAQMD REFERENCE DATA

A. BCAT: 000528	B. CCAT: -	C. APPLICATION TYPE CODE: 50	
D. RECLAIM FAC? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	E. TITLE V FAC: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	F. SOURCE TEST ID(S): N/A	
G. SCAQMD SOURCE SPECIFIC RULES: Rule 1173			
H. HEALTH RISK FOR PERMIT UNIT			
H1. MICR: -	H2. MICR DATE: -	H3. CANCER BURDEN: -	H4. CB DATE: -
H5. HIA: -	H6. HIA DATE: -	H7. HIC: -	H8. HIC DATE: -



Section I – South Coast AQMD BACT Determination

Source Type: **Major/LAER**

Application No.: **617290**

Equipment Category: **Heater**

Equipment Subcategory: **Other Process**

Date: **February 2, 2024**

1. EQUIPMENT INFORMATION

A. MANUFACTURER: Callidus	B. MODEL: N/A	
C. DESCRIPTION: Callidus Technologies Heater, with internal flue gas recirculation. Equipped with three ClearSign Core Ultra Low NOx Burners, natural draft (rated at 12.5 MMBtu/hr total).		
D. FUNCTION: SFPP Colton functions as a bulk loading/unloading and pipeline transfer station. When product is switched in the pipeline, a gasoline/diesel blend (transmix) is produced. Within the transmix processing plant, this heater is used for the flash distillation process that separates the transmix blends to recover the individual fractions.		
E. SIZE/DIMENSIONS/CAPACITY: 12.5 MMBtu/hr		
COMBUSTION SOURCES		
F. MAXIMUM HEAT INPUT: 3 burners, total of 12.5 MMBtu/hr		
G. BURNER INFORMATION		
TYPE	INDIVIDUAL HEAT INPUT	NUMBER
Ultra Low NOx	4.167 MMBtu/hr	3
H. PRIMARY FUEL: Natural gas	I. OTHER FUEL: Process gas	
J. OPERATING SCHEDULE: 24 HRS/DAY 7 DAYS/WEEK WKS/YEAR (See Section 1.L.)		
K. EQUIPMENT COST: N/A		
L. EQUIPMENT INFORMATION COMMENTS: The transmix system typically operates about two weeks per month at 24 hours per day of operation with a non-operating week in between.		

2. COMPANY INFORMATION

A. COMPANY: SFPP, L.P. Colton Terminal	B. FAC ID: 800129
C. ADDRESS: 2359 Riverside Ave CITY: Bloomington STATE: CA ZIP: 92316	D. NAICS CODE: 486910
E. CONTACT PERSON: Nina McAfee	F. TITLE: EHS Manager
G. PHONE NO.: (713) 420-5610	H. EMAIL: Nina_McAfee@kindermorgan.com

3. PERMIT INFORMATION

A. AGENCY: South Coast AQMD	B. APPLICATION TYPE: MODIFICATION
C. SCAQMD ENGINEER: Linda Dejbakhsh	
D. PERMIT INFORMATION: PC ISSUANCE DATE: 11/18/20 PO NO.: G71481 PO ISSUANCE DATE: 4/4/2023	
E. START-UP DATE: 3/5/2021	
F. OPERATIONAL TIME: Over 2 years	

4. EMISSION INFORMATION

A. BACT EMISSION LIMITS AND AVERAGING TIMES: .						
	VOC	NOx	SOx	CO	PM OR PM₁₀	INORGANIC
BACT Limit		7 PPM		100 PPM		
Averaging Time		15 minutes		15 minutes		
Correction		3% O ₂		3% O ₂		
B. OTHER BACT REQUIREMENTS: -						
C. BASIS OF THE BACT/LAER DETERMINATION: Achieved in Practice/New Technology						
D. EMISSION INFORMATION COMMENTS: This facility is not a major source of HAP and 40 CFR Part 63 Subpart DDDDD does not apply. If the facility is subject to 40 CFR Part 63 Subpart DDDDD then during tune-ups required under this subpart, the 100 ppm CO limit would not apply.						

5. CONTROL TECHNOLOGY

A. MANUFACTURER: ClearSign	B. MODEL: CL-CPB-1-050X		
C. DESCRIPTION: 3 ClearSign Core Ultra Low NOx Burners, Natural Draft			
D. SIZE/DIMENSIONS/CAPACITY: Three 4.167 MMBtu/hr burners for a total of 12.5 MMBtu/hr			
E. CONTROL EQUIPMENT PERMIT INFORMATION: APPLICATION NO. 617290 PC ISSUANCE DATE: 11/18/20 PO NO.: G71481 PO ISSUANCE DATE: 4/4/2023			
CONTAMINANT	OVERALL CONTROL EFFICIENCY	CONTROL DEVICE EFFICIENCY	COLLECTION EFFICIENCY
VOC	___%	___%	___%
NOx	___%	___%	___%
SOx	___%	___%	___%
CO	___%	___%	___%
PM	___%	___%	___%
PM ₁₀	___%	___%	___%
INORGANIC	___%	___%	___%
G. CONTROL TECHNOLOGY COMMENTS: -			

6. DEMONSTRATION OF COMPLIANCE

A. COMPLIANCE DEMONSTRATED BY: Source Test									
B. DATE(S) OF SOURCE TEST: 4/28/2021									
C. COLLECTION EFFICIENCY METHOD: N/A									
D. COLLECTION EFFICIENCY PARAMETERS: N/A									
E. SOURCE TEST/PERFORMANCE DATA:									
<table border="1" style="margin: auto; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">Pollutant</th> <th style="width: 33%;">Test Result</th> <th style="width: 33%;">Emission Limit</th> </tr> </thead> <tbody> <tr> <td>NOx, ppmv @ 3% O₂</td> <td style="text-align: center;">6.25</td> <td style="text-align: center;">7</td> </tr> <tr> <td>CO, ppmv @ 3% O₂</td> <td style="text-align: center;">< 2.00</td> <td style="text-align: center;">100</td> </tr> </tbody> </table>	Pollutant	Test Result	Emission Limit	NOx, ppmv @ 3% O ₂	6.25	7	CO, ppmv @ 3% O ₂	< 2.00	100
Pollutant	Test Result	Emission Limit							
NOx, ppmv @ 3% O ₂	6.25	7							
CO, ppmv @ 3% O ₂	< 2.00	100							
F. TEST OPERATING PARAMETERS AND CONDITIONS: N/A									
G. TEST METHODS (SPECIFY AGENCY): South Coast AQMD Method 100.1									
H. MONITORING AND TESTING REQUIREMENTS: The source test shall be conducted at least every three years.									
I. DEMONSTRATION OF COMPLIANCE COMMENTS: -									

7. ADDITIONAL SCAQMD REFERENCE DATA

A. BCAT: 19603	B. CCAT: -	C. APPLICATION TYPE CODE: 50	
D. RECLAIM FAC? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	E. TITLE V FAC: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	F. SOURCE TEST ID(S): PR20335	
G. SCAQMD SOURCE SPECIFIC RULES: 1146			
H. HEALTH RISK FOR PERMIT UNIT			
H1. MICR: -	H2. MICR DATE: -	H3. CANCER BURDEN: -	H4. CB DATE: -
H5. HIA: -	H6. HIA DATE: -	H7. HIC: -	H8. HIC DATE: -



Section II - Other LAER/BACT Determination

Source Type: **Major/LAER**

Application No.: **1153979**

Equipment Category: **Heater**

Equipment Subcategory: **Other Process**

Date: **February 2, 2024**

1. EQUIPMENT INFORMATION

A. MANUFACTURER:		B. MODEL:	
C. DESCRIPTION: 15 MMBtu/hr heater (Heater # 21)			
D. FUNCTION: Standby heater #21 provides process heat for the fractionator in the event that heat from the cogeneration unit is not available. Heater is located at Lube Oil Finishing Plant.			
E. SIZE/DIMENSIONS/CAPACITY: 15 MMBtu/hr			
COMBUSTION SOURCES			
F. MAXIMUM HEAT INPUT:			
G. BURNER INFORMATION			
TYPE	INDIVIDUAL HEAT INPUT		NUMBER
ClearSign Burner	15 MMBtu/hr		1
H. PRIMARY FUEL: PUC natural gas		I. OTHER FUEL: N/A	
J. OPERATING SCHEDULE:	Hours	HRS/DAY	DAYS/WEEK WKS/YR
K. EQUIPMENT COST:			
L. EQUIPMENT INFORMATION COMMENTS:			

2. COMPANY INFORMATION

A. COMPANY: Tricor Refining, LLC		B. FAC ID: S-44	
C. ADDRESS: 1134 Manor St CITY: Bakersfield STATE: CA ZIP: 93388		D. NAICS CODE: 2951	
E. CONTACT PERSON: Jeff Beecher		F. TITLE: Environmental Manager	
G. PHONE NO.: (661) 393-7110		H. EMAIL: jeffb@sjr.com	

3. PERMIT INFORMATION

A. AGENCY: San Joaquin Valley Air Pollution Control District	B. APPLICATION TYPE: OTHER
C. SCAQMD ENGINEER: -	
D. PERMIT INFORMATION: PC ISSUANCE DATE: 6/1/16 P/O NO.: S-44-4-20 PO ISSUANCE DATE: 9/13/2017	
E. START-UP DATE: 7/10/17	
F. OPERATIONAL TIME: Over 5 years	

4. EMISSION INFORMATION

A. BACT EMISSION LIMITS AND AVERAGING TIMES: List all criteria contaminant or precursor emission limits, including facility limits, on the permit(s) that affects the equipment. Include units, averaging times and corrections (%O ₂ , %CO ₂ , dry, etc). For VOC, values must include if the concentration is reported as methane, hexane or any other compound. VOC mass emissions should include the molecular weight-to-carbon ratio, if applicable.						
	VOC	NOx	SOx	CO	PM OR PM₁₀	INORGANIC
BACT Limit		6 PPMV 0.007 LB /MMBTU		50 PPMV 0.037 LB /MMBTU		
Averaging Time		30 min		30 min		
Correction		3% O ₂		3% O ₂		
B. OTHER BACT REQUIREMENTS: N/A						
C. BASIS OF THE BACT/LAER DETERMINATION: Achieved in Practice/New Technology						
D. EMISSION INFORMATION COMMENTS: Condition 11) Emissions from heater shall not exceed any of the following limits: 0.0055 lb-VOC/MMBtu, 0.0076 lb PM10/MMBtu, or 0.00285 lb-SOx/MMBtu.						

5. CONTROL TECHNOLOGY

A. MANUFACTURER: ClearSign		B. MODEL:	
C. DESCRIPTION: Low-NOx Burner			
D. SIZE/DIMENSIONS/CAPACITY: 15 MMBtu/hr			
E. CONTROL EQUIPMENT PERMIT INFORMATION: APPLICATION NO.: - PC ISSUANCE DATE: - PO NO.: - PO ISSUANCE DATE: -			
F. REQUIRED CONTROL EFFICIENCIES: N/A			
CONTAMINANT	OVERALL CONTROL EFFICIENCY	CONTROL DEVICE EFFICIENCY	COLLECTION EFFICIENCY
VOC	___%	___%	___%
NOx	___%	___%	___%
SOx	___%	___%	___%
CO	___%	___%	___%
PM	___%	___%	___%
PM ₁₀	___%	___%	___%
INORGANIC	___%	___%	___%
G. CONTROL TECHNOLOGY COMMENTS: N/A			

6. DEMONSTRATION OF COMPLIANCE

A. COMPLIANCE DEMONSTRATED BY: Source Test					
B. DATE(S) OF SOURCE TEST: 9/15/2017 and 9/1/2020					
C. COLLECTION EFFICIENCY METHOD: N/A					
D. COLLECTION EFFICIENCY PARAMETERS: N/A					
E. SOURCE TEST/PERFORMANCE DATA:					
Pollutant		9/15/2017 Test Result	9/1/2020 Test Result	Emission Limit	Test Method
NOx	ppmv @ 3% O ₂	5.34	5.61	6	CARB Method 100
CO	ppmv @ 3% O ₂	37.5	39.9	50	CARB Method 100
F. TEST OPERATING PARAMETERS AND CONDITIONS: The unit was tested under normal operation conditions.					
G. TEST METHODS (SPECIFY AGENCY): See table above. EPA Method 7E, 10, and CARB Method 100.					
H. MONITORING AND TESTING REQUIREMENTS: Source Test for NOx and CO once per 12 months or 36 months, depending on performance. The permittee shall monitor and record the Heater #21 stack concentration of NOx, CO, and O ₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications.					

I. DEMONSTRATION OF COMPLIANCE COMMENTS: N/A

7. ADDITIONAL SCAQMD REFERENCE DATA

A. BCAT: N/A	B. CCAT: N/A	C. APPLICATION TYPE CODE: -	
D. RECLAIM FAC? YES <input type="checkbox"/> NO <input type="checkbox"/>	E. TITLE V FAC: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	F. SOURCE TEST ID(S):	
G. SCAQMD SOURCE SPECIFIC RULES: -			
H. HEALTH RISK FOR PERMIT UNIT			
H1. MICR: -	H2. MICR DATE: -	H3. CANCER BURDEN: -	H4. CB DATE: -
H5: HIA: -	H6. HIA DATE: -	H7. HIC: -	H8. HIC DATE: -



Section I – South Coast AQMD BACT Determination

Source Type: **Major/LAER**
 Application No.: **625886 - 625889**
 Equipment Category: **Linear Generator**
 Equipment Subcategory: **Non-Emergency Electrical Generator, Natural Gas Fired**
 Date: **February 2, 2024**

1. EQUIPMENT INFORMATION

A. MANUFACTURER: Mainspring Energy		B. MODEL: MSE-230-NG	
C. DESCRIPTION: Linear generator means any power generation technology that uses a thermochemical reaction to create linear motion that is directly converted into electricity. Each linear generator system consists of two identical cores. Each core is vented to an oxidation catalyst.			
D. FUNCTION: Mainspring linear generator uses a low-temperature reaction to produce electricity and is used as a stationary prime power source at this facility.			
E. SIZE/DIMENSIONS/CAPACITY: Each core is 120 kW _e			
COMBUSTION SOURCES			
F. MAXIMUM HEAT INPUT:			
G. BURNER INFORMATION			
TYPE		INDIVIDUAL HEAT INPUT	
NUMBER		NUMBER	
N/A		N/A	
H. PRIMARY FUEL: Natural gas		I. OTHER FUEL: N/A	
J. OPERATING SCHEDULE: 24 HRS/DAY 7 DAYS/WEEK 52 WKS/YEAR			
K. EQUIPMENT COST: N/A			
L. EQUIPMENT INFORMATION COMMENTS: -			

2. COMPANY INFORMATION

A. COMPANY: Mainspring Energy, Incorporated		B. FAC ID: 193535	
C. ADDRESS: 2063 Miguel Bustamante Pkwy CITY: Colton STATE: CA ZIP: 92324		D. NAICS CODE: 493120	
E. CONTACT PERSON: Adam Simpson		F. TITLE: Co-Founder and CPO	
G. PHONE NO.: (650) 330-1051		H. EMAIL: Adam.Simpson@mainspringenergy.com	

3. PERMIT INFORMATION

A. AGENCY: South Coast AQMD	B. APPLICATION TYPE: NEW CONSTRUCTION
C. SCAQMD ENGINEER: Kate Kim	
D. PERMIT INFORMATION: PC ISSUANCE DATE: 6/15/21 P/O NO.: G68437- G68440 PO ISSUANCE DATE: 4/20/2022	
E. START-UP DATE: 2022	
F. OPERATIONAL TIME: + one year	

4. EMISSION INFORMATION

A. BACT EMISSION LIMITS AND AVERAGING TIMES: .						
	VOC	NOx	SOx	CO	PM OR PM₁₀	INORGANIC
BACT Limit	25 PPMVD	2.5 PPMVD		12 PPMVD		
Averaging Time	*	*		*		
Correction	15% O ₂	15% O ₂		15% O ₂		
B. OTHER BACT REQUIREMENTS: * averaged over 15 minutes.						
C. BASIS OF THE BACT/LAER DETERMINATION: Achieved in Practice/New Technology						
D. EMISSION INFORMATION COMMENTS: N/A						

5. CONTROL TECHNOLOGY

A. MANUFACTURER: Johnson Matthey		B. MODEL: MC6T-6F-2	
C. DESCRIPTION: Oxidation catalyst			
D. SIZE/DIMENSIONS/CAPACITY: N/A			
E. CONTROL EQUIPMENT PERMIT INFORMATION: N/A APPLICATION NO.: N/A PC ISSUANCE DATE: Click here to enter a date. PO NO.: N/A PO ISSUANCE DATE: Click here to enter a date.			
F. REQUIRED CONTROL EFFICIENCIES: N/A			
CONTAMINANT	OVERALL CONTROL EFFICIENCY	CONTROL DEVICE EFFICIENCY	COLLECTION EFFICIENCY
VOC	___%	___%	___%
NOx	___%	___%	___%
SOx	___%	___%	___%
CO	___%	___%	___%
PM	___%	___%	___%
PM ₁₀	___%	___%	___%
INORGANIC	___%	___%	___%
G. CONTROL TECHNOLOGY COMMENTS: Condition 9) After every six months of operation, the operator shall inspect the oxidation catalyst and determine if it needs to be cleaned or washed. Condition 10) The operator shall wash the catalyst or replace the catalyst media at least after 12,000 hours of operation.			

6. DEMONSTRATION OF COMPLIANCE

A. COMPLIANCE DEMONSTRATED BY: Source Test
B. DATE(S) OF SOURCE TEST: 1/18/2022
C. COLLECTION EFFICIENCY METHOD: N/A
D. COLLECTION EFFICIENCY PARAMETERS: N/A

E. SOURCE TEST/PERFORMANCE DATA:

Parameter	Core 1			Core 2			Permit Limit
	Normal Load	Max. Load	Min. Load	Normal Load	Max. Load	Min. Load	
CO, PPM @ 15% O ₂	1.80	1.82	2.35	2.17	1.92	2.34	12.00
NO _x , PPM @ 15% O ₂	1.66	1.76	1.07	1.91	1.82	0.90	2.50
VOC, PPM @ 15% O ₂	4.35	-	-	4.03	-	-	25.00

Parameter	Core 3			Core 4			Permit Limit
	Normal Load	Max. Load	Min. Load	Normal Load	Max. Load	Min. Load	
CO, PPM @ 15% O ₂	1.80	1.80	2.40	1.90	1.90	2.10	12.00
NO _x , PPM @ 15% O ₂	1.94	1.70	1.19	1.13	1.12	1.12	2.50
VOC, PPM @ 15% O ₂	2.64	-	-	4.01	-	-	25.00

F. TEST OPERATING PARAMETERS AND CONDITIONS:

Condition 15) the owner/operator shall conduct source test in accordance with the periodic source testing requirements of Rule 1110.2.

Condition 16.a) the test shall measure NO_x, VOC, CO, oxygen content, moisture content, temperature, and exhaust flow rate at the exhaust of the equipment.

G. TEST METHODS (SPECIFY AGENCY):

- South Coast AQMD Method 100.1 for NO_x, O₂, CO₂, and CO (3 runs, 24-36 mins each)
- South Coast AQMD Method 2.3 for velocity (3 runs, 24 mins each)
- South Coast AQMD Method 4.1 for moisture (3 runs, 24 mins each)
- South Coast AQMD Method 25.3 for VOC (1 run, 30 mins)

H. MONITORING AND TESTING REQUIREMENTS:

Condition 19) the operator shall conduct a source test annually on the equipment within 365 calendar days of previous source test.

I. DEMONSTRATION OF COMPLIANCE COMMENTS: -

7. ADDITIONAL SCAQMD REFERENCE DATA

A. BCAT: 040005		B. CCAT: -		C. APPLICATION TYPE CODE: -	
D. RECLAIM FAC? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		E. TITLE V FAC: YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		F. SOURCE TEST ID(S): PR22000 and PR22000A	
G. SCAQMD SOURCE SPECIFIC RULES: Rule 1110.2. Rule 1110.3 as of 11/3/2023					
H. HEALTH RISK FOR PERMIT UNIT					
H1. MICR: -		H2. MICR DATE: -		H3. CANCER BURDEN: -	
H4. CB DATE: -		H5: HIA: -		H6. HIA DATE: -	
H7. HIC: -		H8. HIC DATE: -			



Section II - Other LAER/BACT Determination

Source Type: **Major/LAER**
 Application No.: **29170**
 Equipment Category: **Gas Turbine**
 Equipment Subcategory: **Simple Cycle, Natural Gas**
 Date: **February 2, 2024**

1. EQUIPMENT INFORMATION

A. MANUFACTURER: Siemens		B. MODEL: SGT6-5000F	
C. DESCRIPTION: Simple cycle natural gas fired turbine generator with Selective Catalytic Reduction (SCR) system and Oxidation Catalyst. The turbines are equipped with dry low-NOx (DLN) combustors.			
D. FUNCTION: The Marsh Landing Generating Station is a merchant power plant with a nominal generating capacity of 760 MW. The plant uses four natural-gas-fired Siemens SGT6-5000F combustion turbine generators that burn natural gas to generate electrical power.			
E. SIZE/DIMENSIONS/CAPACITY: 190 MW each (nominal)			
COMBUSTION SOURCES			
F. MAXIMUM HEAT INPUT: 2202 MMBtu/hour each			
G. BURNER INFORMATION			
	TYPE	INDIVIDUAL HEAT INPUT	NUMBER
	-	-	-
H. PRIMARY FUEL: PUC-regulated Natural Gas		I. OTHER FUEL: N/A	
J. OPERATING SCHEDULE: See section (1)(L)	HRS/DAY	DAYS/WEEK	WKS/YR
K. EQUIPMENT COST: N/A			
L. EQUIPMENT INFORMATION COMMENTS: Under the BAAQMD permit, the combined hours for all four units shall not exceed 7,008 hours per year (with exceptions for maintenance, tuning, testing, and commissioning).			

2. COMPANY INFORMATION

A. COMPANY: Marsh Landing Generating Station		B. FAC ID: B9169	
C. ADDRESS: 3201-C Wilbur Avenue CITY: Antioch STATE: CA ZIP: 94509		D. NAICS CODE: 221112	
E. CONTACT PERSON: Scott Seipel		F. TITLE: Environmental Manager	
G. PHONE NO.: (909) 648-5008		H. EMAIL: scott.seipel@nrg.com	

3. PERMIT INFORMATION

A. AGENCY: Bay Area Air Quality Management District	B. APPLICATION TYPE: NEW CONSTRUCTION
C. SCAQMD ENGINEER: BAAQMD Engineer – Xuna Cai	
D. PERMIT INFORMATION: PC ISSUANCE DATE: 2013 P/O NO.: PO ISSUANCE DATE: 11/3/2015	
E. START-UP DATE: -	
F. OPERATIONAL TIME: over 7 years	

4. EMISSION INFORMATION

A. BACT EMISSION LIMITS AND AVERAGING TIMES: .						
	VOC	NOx	SOx	CO	PM OR PM₁₀	INORGANIC
BACT Limit		2.5 PPMV		2.0 PPMV		
Averaging Time		1 Hour		1 Hour		
Correction		@ 15% O ₂		@ 15% O ₂		
B. OTHER BACT REQUIREMENTS: The emission limits shall not apply during gas turbine start-ups, combustor tuning operations, shutdowns, commissioning activities and readiness testing for black start capability, or black start emergency operations.						
C. BASIS OF THE BACT/LAER DETERMINATION: Achieved in Practice/New Technology						
D. EMISSION INFORMATION COMMENTS: N/A						

5. CONTROL TECHNOLOGY

A. MANUFACTURER: N/A		B. MODEL: N/A	
C. DESCRIPTION: Each unit is equipped with dry low-NOx (DLN) combustors, an Oxidation Catalyst and a Selective Catalytic Reduction (SCR) system control to meet the emission requirements.			
D. SIZE/DIMENSIONS/CAPACITY: N/A			
E. CONTROL EQUIPMENT PERMIT INFORMATION: APPLICATION NO.: - PC ISSUANCE DATE: See (3)(D) PO NO.: - PO ISSUANCE DATE: See (3)(D)			
F. REQUIRED CONTROL EFFICIENCIES: N/A			
CONTAMINANT	OVERALL CONTROL EFFICIENCY	CONTROL DEVICE EFFICIENCY	COLLECTION EFFICIENCY
VOC (POC)	___%	___%	___%
NOx	___%	___%	___%
SOx	___%	___%	___%
CO	___%	___%	___%
PM	___%	___%	___%
PM ₁₀	___%	___%	___%
INORGANIC	___%	___%	___%
G. CONTROL TECHNOLOGY COMMENTS: The permit has a limit of 10 ppmvd for ammonia (NH ₃) emission concentrations at each exhaust point corrected to 15% O ₂ , on a dry basis, averaged over any rolling 3-hour period. Precursor Organic Compounds (POC) mass emissions (as CH ₄) at each exhaust point shall not exceed 2.9 pounds per hour or 0.00132 lb/MMBtu of natural gas fired.			

6. DEMONSTRATION OF COMPLIANCE

A. COMPLIANCE DEMONSTRATED BY: Continuous emission monitoring system (CEMS) and Annual Source Test				
B. DATE(S) OF SOURCE TEST: November 20-21, 2019 CEMS DATE: August 2022 (NOx and CO)				
C. COLLECTION EFFICIENCY METHOD: N/A				
D. COLLECTION EFFICIENCY PARAMETERS: N/A				
E. SOURCE TEST/PERFORMANCE DATA:				
Test Date		11/20/2019	11/15/2021	
Pollutant		Unit A Average Test Result	Unit B Average Test Result	Emission Limit
NOx	ppmvd @ 15% O ₂	2.2	2.25	2.5
CO	ppmvd @ 15% O ₂	0.2	0.34	2
NH ₃	ppmvd @ 15% O ₂	1.66	1	10

F. TEST OPERATING PARAMETERS AND CONDITIONS: Emission tests were performed while the units and air pollution control devices were operating. The source tests consisted of 3 separate runs. The emission concentrations of NO_x, CO, and NH₃ must be corrected to 15% O₂. Continuous emission monitoring for NO_x and CO emission concentrations are averaged over any 1-hour period. NH₃ emission concentrations are averaged over any rolling 3-hour period.

G. TEST METHODS (SPECIFY AGENCY):

Pollutant	No. of Runs	Test Methods
NO _x	3 Tests Average	EPA 7E
CO	3 Tests Average	EPA 10
NH ₃	3 Tests Average	BAAQMD ST-1B
POC as CH ₄ methane, ethane	3 Tests Average	EPA 18/TO-12

H. MONITORING AND TESTING REQUIREMENTS: Source Testing required annually for pollutants listed in source test data above. Continuous emission monitoring is required for NO_x and CO. The ammonia emission concentration is verified by the continuous recording of the ammonia injection rate to each SCR system.

I. DEMONSTRATION OF COMPLIANCE COMMENTS:

7. ADDITIONAL SCAQMD REFERENCE DATA

A. BCAT: -	B. CCAT: -	C. APPLICATION TYPE CODE: -	
D. RECLAIM FAC? YES <input type="checkbox"/> NO <input type="checkbox"/>	E. TITLE V FAC: YES <input type="checkbox"/> NO <input type="checkbox"/>	F. SOURCE TEST ID(S):	
G. SCAQMD SOURCE SPECIFIC RULES: -			
H. HEALTH RISK FOR PERMIT UNIT			
H1. MICR: -	H2. MICR DATE: -	H3. CANCER BURDEN: -	H4. CB DATE: -
H5: HIA: -	H6. HIA DATE: -	H7. HIC: -	H8. HIC DATE: -



Section I – South Coast AQMD LAER/BACT Determination

Source Type: **Major/LAER**
 Application No.: **470738, 470739, 555856, and 555857**
 Equipment Category: **Sulfur Recovery Unit**
 Equipment Subcategory: **Claus Unit and Tail Gas Treatment Unit**
 Date: **February 2, 2024**

1. EQUIPMENT INFORMATION

A. MANUFACTURER:		B. MODEL:	
C. DESCRIPTION: Sulfur Recovery Unit (SRU) which consists of Claus Unit and Tail Gas Treatment Unit (TGTU) followed by a Tail Gas Incinerator and Caustic Scrubber.			
D. FUNCTION: The acid gas feeds to the SRU to recover elemental sulfur. Sulfur not recovered in the Claus unit (front portion of SRU) will process in an amine-based tail gas treatment unit (rear portion of SRU). The TGTU is vented to a tail gas incinerator, followed by a caustic scrubber for removal of remaining H ₂ S and SO _x , respectively.			
E. SIZE/DIMENSIONS/CAPACITY: Sulfur production capacity is 235 long tons per day when processing amine acid gas only.			
COMBUSTION SOURCES			
F. MAXIMUM HEAT INPUT: 50.1 MMBTU/Hr			
G. BURNER INFORMATION			
TYPE		INDIVIDUAL HEAT INPUT	
Ultra Low NO _x		50.1 MMBTU/HR	
		NUMBER	
		1	
H. PRIMARY FUEL: Natural gas		I. OTHER FUEL: N/A	
J. OPERATING SCHEDULE: 24 HRS/DAY 7 DAYS/WEEK 52 WKS/YR			
K. EQUIPMENT COST: N/A			
L. EQUIPMENT INFORMATION COMMENTS:			

2. COMPANY INFORMATION

A. COMPANY: Chevron Products Company		B. FAC ID: 800030	
C. ADDRESS: 324 W El Segundo Blvd. CITY: El Segundo STATE: CA ZIP: 90245		D. NAICS CODE: 324110	
E. CONTACT PERSON: Sara Antunez		F. TITLE: Air Permitting Engineer	
G. PHONE NO.: (310) 615 - 2957		H. EMAIL: Sara.Antunez@chevron.com	

3. PERMIT INFORMATION

A. AGENCY: South Coast AQMD	B. APPLICATION TYPE: NEW CONSTRUCTION
C. SCAQMD ENGINEER: Bob Sanford	
D. PERMIT INFORMATION: PC ISSUANCE DATE: 5/13/10 and 8/11/2015 for 555856 and 555857 P/O NO.: PO ISSUANCE DATE: 5/31/2017	
E. START-UP DATE: 2012	
F. OPERATIONAL TIME: +10 years	

4. EMISSION INFORMATION

A. BACT EMISSION LIMITS AND AVERAGING TIMES: .						
	VOC	NOx	SOx	CO	PM OR PM₁₀	INORGANIC (H₂S)
BACT Limit		0.05 LB/MMBTU NATURAL GAS*	12 PPMVD	0.03 LB/MMBTU NATURAL GAS*		2.5 PPMV
Averaging Time		24 hours	72 hours	24 hours		24 hours
Correction		-	0% O ₂	-		0% O ₂
B. OTHER BACT REQUIREMENTS: * Incinerator is equipped with ultra-low NOx burner and emission limits are based on the lower heating value (LHV) of natural gas.						
C. BASIS OF THE BACT/LAER DETERMINATION: Achieved in Practice/New Technology						
D. EMISSION INFORMATION COMMENTS: Permit conditions A99.17 and A99.18 have provisions for NOx and CO BACT limits during start-up and shutdown. SOx BACT limit does not need an equivalent allowance because sour gas/waste gas is not being routed to the SRU/TGTU during these periods.						

5. CONTROL TECHNOLOGY

A. MANUFACTURER: N/A		B. MODEL: N/A	
C. DESCRIPTION: Tail gas incinerator (Ultra Low-NOx burner, Coen/Todd combustion Rapid Mix Burner (RMB)) and SO ₂ scrubber (tail gas polishing).			
D. SIZE/DIMENSIONS/CAPACITY: Condition C1.146) The operator shall limit the firing rate of burner to no more than 50.1 MMBTU per hour.			
E. CONTROL EQUIPMENT PERMIT INFORMATION: APPLICATION NOS.: 555856 and 555857 PC ISSUANCE DATE: See Section (3)(D) PO NO.: PO ISSUANCE DATE: 5/31/2017			
F. REQUIRED CONTROL EFFICIENCIES: N/A			
CONTAMINANT	OVERALL CONTROL EFFICIENCY	CONTROL DEVICE EFFICIENCY	COLLECTION EFFICIENCY
VOC	___%	___%	___%
NO _x	___%	___%	___%
SO _x	___%	___%	___%
CO	___%	___%	___%
PM	___%	___%	___%
PM ₁₀	___%	___%	___%
INORGANIC	___%	___%	___%
G. CONTROL TECHNOLOGY COMMENTS: The John Zink designed tail gas incinerator utilizes natural gas as the primary fuel to combust the tail gas from the TGTU to reduce the tail gas H ₂ S concentration below 2.5 ppmvd. The 1450°F temperature is required to meet the BACT CO limit of 0.03 lb/MMBtu at the stack and the H ₂ S limit of 2.5 ppmv (averaged over 24 hours, 0%).			

6. DEMONSTRATION OF COMPLIANCE

A. COMPLIANCE DEMONSTRATED BY: Source tests and continuous emission monitoring system (CEMS)				
B. DATE(S) OF SOURCE TEST: 9/29/2015 - 10/2/2015				
C. COLLECTION EFFICIENCY METHOD: N/A				
D. COLLECTION EFFICIENCY PARAMETERS: N/A				
E. SOURCE TEST/PERFORMANCE DATA:				
Test Date		12/27/2012 – 2/6/2013	9/29/2015 - 10/2/2015	
Pollutant		Average Test Results	Average Test Result	Emission Limit
NO _x	lbs/MMBTU	0.01	0.04	0.05
CO	lbs/MMBTU	< 0.01	0	0.03
H ₂ S	ppmvd (0% O ₂)	0.12	0.13	2.5
SO _x	ppmvd (0% O ₂)	0.16	0.02	12
The test results are based on a 1-hour average.				

F. TEST OPERATING PARAMETERS AND CONDITIONS: Condition D29.11) The test shall be conducted when this equipment is operating at 80 percent or greater of the maximum design capacity.			
G. TEST METHODS (SPECIFY AGENCY):			
Pollutant(s) to be tested	Required Test Method(s)	Averaging Time	Test Location
NO _x	District Method 100.1	1 hour	Outlet of Scrubber
SO _x	District Method 100.1 or 6.1	1 hour	Outlet of Scrubber
CO	District Method 100.1 or 10.1	1 hour	Outlet of Scrubber
VOC	District Method 25.1 or 25.3	1 hour	Outlet of Scrubber
PM	District Method 5.1, 5.2, or 5.3	District-approved averaging time	Outlet of Scrubber
PM ₁₀	EPA Method 201A	District-approved averaging time	Outlet of Scrubber
NH ₃	Approved District method	District-approved averaging time	Outlet of Scrubber

The operator shall also conduct a source test for COS, CS₂, and H₂S using District Method 307-91.

H. MONITORING AND TESTING REQUIREMENTS:

D82.11 The operator shall install and maintain a CEMS to measure the following parameters:
 CO concentration in ppmv
 Oxygen concentration in percent volume
 The CEMS shall be approved, operated, and maintained in accordance with the requirements of Rule 218.
 To determine compliance with the CO emission limit, the CEMS data shall be converted from CO concentrations to mass emission rates (lbs/MMBtu of natural gas combusted) on a continuous basis. The natural gas firing rate shall be determined using a fuel meter that is calibrated according to manufacturer's recommendations and a low heating value (LHV) of 914 btu/scf for natural gas.
[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; RULE 407, 4-2-1982]
 [Devices subject to this condition: C4344*]

D82.12 The operator shall install and maintain a CEMS to measure the following parameters:
 NO_x concentration in ppmv
 SO_x concentration in ppmv
 Oxygen concentration in percent volume
 To determine compliance with the NO_x emission limit, the CEMS data shall be converted from NO_x concentrations to mass emission rates (lbs/MMBtu of natural gas combusted) on a continuous basis. The natural gas firing shall be determined using a fuel meter that is calibrated according to manufacturer's recommendations and a low heating value (LHV) of 914 btu/scf for natural gas.
[RULE 2005, 5-6-2005]
 [Devices subject to this condition: C4344*]

*Incinerator

I. DEMONSTRATION OF COMPLIANCE COMMENTS: N/A

7. ADDITIONAL SCAQMD REFERENCE DATA

A. BCAT: 289620		B. CCAT: 91, 96 and 4B		C. APPLICATION TYPE CODE: -	
D. RECLAIM FAC? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		E. TITLE V FAC: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		F. SOURCE TEST ID(S): PR 12091 and R 16048	
G. SCAQMD SOURCE SPECIFIC RULES: -					
H. HEALTH RISK FOR PERMIT UNIT					
H1. MICR: -		H2. MICR DATE: -		H3. CANCER BURDEN: -	
H4. CB DATE: -		H5. HIA: -		H6. HIA DATE: -	
H7. HIC: -		H8. HIC DATE: -			



Section I- South Coast AQMD BACT Determination

Source Type: **Major/LAER**
 Application No.: **509018**
 Equipment Category: **Liquid Transfer and Handling**
 Equipment Subcategory: **Tank Truck Loading/ Unloading Racks, Class A**
 Date: **February 2, 2024**

1. EQUIPMENT INFORMATION

A. MANUFACTURER:		B. MODEL:	
C. DESCRIPTION: The facility functions as bulk loading/unloading and pipeline transfer station. It delivers petroleum products via loading racks and pipeline to customers in the Southern California region.			
D. FUNCTION: Vapor recovery/collection and disposal system, controls vapor displaced due to rack loading as well as tank degassing/refilling.			
E. SIZE/DIMENSIONS/CAPACITY:			
COMBUSTION SOURCES			
F. MAXIMUM HEAT INPUT:			
G. BURNER INFORMATION:			
TYPE		INDIVIDUAL HEAT INPUT	NUMBER
-		-	-
H. PRIMARY FUEL: Natural Gas		I. OTHER FUEL: -	
J. OPERATING SCHEDULE: 24 HRS/DAY 7 DAYS/WEEK 52 WKS/YR			
K. EQUIPMENT COST: N/A			
L. EQUIPMENT INFORMATION COMMENTS:			

2. COMPANY INFORMATION

A. COMPANY: SFPP, L.P.		B. FAC ID: 800129	
C. ADDRESS: 2359 Riverside Ave CITY: Bloomington STATE: CA ZIP: 92316		D. NAICS CODE: 49319	
E. CONTACT PERSON: Bill Toepfer		F. TITLE: Area Manager	
G. PHONE NO.: (909) 873-5152		H. EMAIL: bill_toepfer@KinderMorgan.com	

3. PERMIT INFORMATION

A. AGENCY: South Coast AQMD	B. APPLICATION TYPE: CHANGE OF CONDITIONS
C. SCAQMD ENGINEER: Linda Dejbakhsh	
D. PERMIT INFORMATION: PC ISSUANCE DATE: 4/23/09 P/O NO.: G37437 PO ISSUANCE DATE: 9/29/2015	
E. START-UP DATE: -	
F. OPERATIONAL TIME: 6+ years	

4. EMISSION INFORMATION

A. BACT EMISSION LIMITS AND AVERAGING TIMES						
	VOC	NOx	SOx	CO	PM OR PM₁₀	INORGANIC
BACT Limit	0.02 LBS/1000 GALLONS					
Averaging Time						
Correction						
B. OTHER BACT REQUIREMENTS: -						
C. BASIS OF THE BACT/LAER DETERMINATION: Achieved in Practice/New Technology						
D. EMISSION INFORMATION COMMENTS: -						

5. CONTROL TECHNOLOGY

A. MANUFACTURER: John Zink		B. MODEL: -	
C. DESCRIPTION: Thermal oxidizer for loading rack, direct flame			
D. SIZE/DIMENSIONS/CAPACITY: Diameter – 9ft, Height – 50ft, 1250 CFM Waste Gas Capacity, 78 MMBtu/hr			
E. CONTROL EQUIPMENT PERMIT INFORMATION: APPLICATION NO.: 509018 PC ISSUANCE DATE: 4/23/09 PO NO.: G37437 PO ISSUANCE DATE: 9/29/2015			
F. REQUIRED CONTROL EFFICIENCIES:			
CONTAMINANT	OVERALL CONTROL EFFICIENCY	CONTROL DEVICE EFFICIENCY	COLLECTION EFFICIENCY
VOC	99%	___%	___%
NOx	___%	___%	___%
SOx	___%	___%	___%
CO	___%	___%	___%
PM	___%	___%	___%
PM ₁₀	___%	___%	___%
INORGANIC	___%	___%	___%
G. CONTROL TECHNOLOGY COMMENTS: Permit Condition C6.13) The operator shall use this equipment in such a manner that the flow does not exceed 1250 SCFM. Permit Condition C8.6) The operator shall use this equipment in such a manner that the temperature being monitored is not less than 1225 °F; this does not apply during periods of startup or shutdown, which are not to exceed 30 minutes.			

6. DEMONSTRATION OF COMPLIANCE

A. COMPLIANCE DEMONSTRATED BY: Source test		
B. DATE(S) OF SOURCE TEST: 6/25/2010		
C. COLLECTION EFFICIENCY METHOD: -		
D. COLLECTION EFFICIENCY PARAMETERS: -		
E. SOURCE TEST/PERFORMANCE DATA:		
<ul style="list-style-type: none"> • Test performed at 1225 degrees Fahrenheit • The sampling was conducted over 1-hour period. 		
	Source Test Results	Permit Conditions
VOC Mass Emission Rate	0.01 lbs/1000 gal	≤ 0.02 lbs/1000 gal
VOC Removal Efficiency	99.85%	≥ 99%
Outlet VOC	48.90 ppm	≤ 500 ppm

F. TEST OPERATING PARAMETERS AND CONDITIONS: <ul style="list-style-type: none"> Flow rate must be monitored so that it does not exceed 1250 CFM; Temperature must be monitored so that it does not drop below 1225 degrees Fahrenheit while equipment is operating (except during periods of startup or shutdown).
G. TEST METHODS (SPECIFY AGENCY): South Coast AQMD Method 25.1 and 25.3
H. MONITORING AND TESTING REQUIREMENTS: The source test shall be conducted at least once every 5 years to: <ul style="list-style-type: none"> Determine VOC emission rate in pound per 1000 gallons loaded; Demonstrate a 99% overall control efficiency for the vapor recovery and disposal system; Determine the bulk loading rate in gallons per hour.
I. DEMONSTRATION OF COMPLIANCE COMMENTS: <ul style="list-style-type: none"> Tested for VOC Control Efficiency at 1500 °F, 1225 °F, and 1000 °F

7. ADDITIONAL SCAQMD REFERENCE DATA

A. BCAT: -	B. CCAT: 05	C. APPLICATION TYPE CODE: -	
D. RECLAIM FAC? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	E. TITLE V FAC: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	F. SOURCE TEST ID(S): PR10087	
G. SCAQMD SOURCE SPECIFIC RULES: <ul style="list-style-type: none"> Rule 462: This is a Class A facility required to meet a VOC emissions rate of 0.08 lbs/1000 gallons loaded. Source tests show that the emissions are below 0.08 lbs/1000 gallons, compliance expected. <ul style="list-style-type: none"> Class A Facility is defined as any facility that loads 20,000 gallons of organic liquid or more into any tank truck, trailer, or railroad tank car in any one day. Rule 1149: This afterburner is subject to the 500 ppm VOC limitation during degassing operations, expected to comply. 			
H. HEALTH RISK FOR PERMIT UNIT			
H1. MICR: -	H2. MICR DATE: -	H3. CANCER BURDEN: -	H4. CB DATE: -
H5. HIA: -	H6. HIA DATE: -	H7. HIC: -	H8. HIC DATE: -

ATTACHMENT E

**PART C - POLICY AND PROCEDURES FOR
NON-MAJOR POLLUTING FACILITIES**

Chapter 1 - How Is MSBACT Determined for Minor Polluting Facilities?

This chapter explains the definitions of BACT for non-major polluting facilities (minor source BACT or MSBACT) found in South Coast AQMD rules and state law and how they are interpreted. It also explains the criteria used for initializing the Part D MSBACT Guidelines and the process for updating the MSBACT Guidelines.

PART D OF THE MSBACT GUIDELINES

Part D of the MSBACT Guidelines specifies the MSBACT requirements for all of the commonly permitted categories of equipment (See Chapter 2 for a full explanation of Part D).

The initial listings in Part D of the MSBACT Guidelines reflected the current BACT determinations at the time for sources at non-major polluting facilities as of April 2000. These did not represent new requirements but rather memorialized BACT determinations and emission levels at that time. This initialization was necessary to benchmark the transition from federal LAER to MSBACT for non-major polluting facilities. The control technologies and emission levels identified applied to any non-major source subject to NSR until the Guideline was updated or became out of date. The dates listed on the BACT determinations in Part D refer to the date of adoption of the determination. The dates listed do not grandfather the equipment from complying with any new requirements or limits that are implemented after the approval of a BACT determination¹.

CRITERIA FOR NEW MSBACT AND UPDATING PART D

MSBACT requirements are determined for each source category based on the definition of MSBACT. In essence, MSBACT is the most stringent emission limit or control technology for a class or category of source that is:

- found in a state implementation plan (SIP) pursuant to Health and Safety Code section 40405(a)(1), or
- achieved in practice (AIP), or
- is technologically feasible and cost effective.

For practical purposes, nearly all South Coast AQMD MSBACT determinations will be based on AIP BACT because it is generally more stringent than MSBACT based on SIP, and because state law contains some constraints on South Coast AQMD from using the third approach. For minor polluting facilities, MSBACT will also take economic feasibility into account.

Based on Governing Board policy, MSBACT also includes a requirement for the use of clean fuels.

Terms such as “achieved in practice” and “technologically feasible” (including technology transfer) have not been defined in the rule, so one of the purposes of this

¹ South Coast AQMD Rule 1303(a)(3)

section is to explain the criteria South Coast AQMD permitting staff uses to make a MSBACT determination.

MSBACT Based on a SIP

The most stringent emission limit found in an approved state implementation plan (SIP) may be an option for establishing MSBACT. This means that the most stringent emission limit adopted by any state as a rule, regulation or permit² and approved by U.S. EPA is eligible as a MSBACT requirement. This does not include future emission limits that have not yet been implemented.

Achieved in Practice MSBACT

MSBACT may be an option for establishing the most stringent control technology or emission limit that has been achieved in practice (AIP) for a category or class of source. AIP control technology may be in operation in the United States or any other part of the world. South Coast AQMD permitting engineers will review the following sources to determine the most stringent AIP MSBACT:

- LAER/BACT determinations in Part B of the BACT Guidelines
- CAPCOA BACT Clearinghouse
- U.S. EPA RACT/BACT/LAER Clearinghouse
- Other districts' and states' BACT Guidelines
- Permits to operate issued by South Coast AQMD or other agencies
- Any other source for which the requirements of AIP can be demonstrated

Achieved in Practice Criteria

A control technology or emission limit found in any of the references above may be considered as AIP if it meets all of the following criteria:

Commercial Availability

At least one vendor must offer this equipment for regular or full-scale operation in the United States. A performance warranty or guaranty must be available with the purchase of the control technology, as well as parts and service.

Reliability

The control technology must have been installed and operated reliably for at least twelve months on a comparable commercial operation. If the operator did not require the basic equipment to operate continuously, such as only eight hours per day and 5 days per week, then the control technology must have operated whenever the basic equipment was in operation during the twelve months.

Effectiveness

The control technology must be verified to perform effectively over the range of operation expected for that type of equipment. If the control technology will be allowed to operate at lesser effectiveness during certain modes of operation, then those modes must be identified. The verification shall be based on a South Coast AQMD-approved performance test or tests, when possible, or other performance data.

Cost Effectiveness

The control technology or emission rate must be cost effective for a substantial number

² Some states incorporate individual permits into their SIP as case-by-case Reasonably Available Control Technology requirements.

of sources within the class or category. Cost effectiveness criteria are described in detail in a later section. Cost criteria are not applicable to an individual permit but rather to a class or category of source.

Technology Transfer

MSBACT is based on what is AIP for a category or class of source. However, technology transfer must also be considered across source categories, in view of the other AIP criteria. There are two types of potentially transferable control technologies: 1) exhaust stream controls, and 2) process controls and modifications. For the first type, technology transfer must be considered between source categories that produce similar exhaust streams. For the second type, process similarity governs the technology.

LIMITED BACT EXEMPTION

Rule 1304 - Exemptions was amended in November 2021 to add subdivision (f) to include a limited BACT exemption for RECLAIM and former RECLAIM facilities. This limited BACT exemption is available to new or modified permit unit located at a RECLAIM or former RECLAIM facilities, for PM₁₀ and SO_x emission increases associated with the installation or modification of add-on air pollution control equipment for controlling NO_x emissions to comply with NO_x Best Available Retrofit Control Technology (BARCT) emission limits. The objective of the proposed narrow BACT exemption is to address the co-pollutant issue associated with the installation or modification of add-on air pollution controls and the replacement of equipment that is combined with an installation or modification of add-on air pollution control required to transition NO_x RECLAIM facilities. This limited BACT exemption is available only to project at qualified facilities that meet all the requirements listed under Rule 1304 subparagraphs (f)(1)(A) through (E)³.

Requirements of Health & Safety Code Section 40440.11

Senate Bill 456 (Kelley) was chartered into state law in 1995 and became effective in 1996. H&SC Section 40440.11 specifies the criteria and process that must be followed by the South Coast AQMD to establish new MSBACT limits for source categories listed in the MSBACT Guidelines. In general, the provisions require:

- Considering only control options or emission limits to be applied to the basic production or process equipment;
- Evaluating cost to control secondary pollutants;
- Determining the control technology is commercially available;
- Determining the control technology has been demonstrated for at least one year on a comparable commercial operation;
- Calculating total and incremental cost-effectiveness;
- Determining that the incremental cost-effectiveness is less than South Coast AQMD's established cost-effectiveness criteria;
- Putting BACT Guideline revisions on a regular meeting agenda of the South Coast AQMD Governing Board;
- Holding a Board public hearing prior to revising maximum incremental cost-effectiveness values;
- Keeping a BACT determination made for a particular application unchanged for at least one year from the application deemed complete date; and
- Considering a longer period for a major capital project (> \$10,000,000)

³ See Rule 1304 (f).

After consultation with the affected industry, the CARB, and the U.S. EPA, and considerable legal review and analysis, staff concluded that the process specified in SB 456 to update the BACT Guidelines should be interpreted to apply only if the South Coast AQMD proposes to make BACT more stringent than LAER or where LAER is inapplicable (e.g. in establishing minor source BACT). Staff intends to incorporate the spirit and intent of the SB 456 provisions into the MSBACT update process, as explained below, because non-major polluting facilities are no longer subject to federal LAER, according to Regulation XIII. Therefore, MSBACT may consider cost as specified herein.

COST EFFECTIVENESS METHODOLOGY

Cost effectiveness is measured in terms of control costs (dollars) per air emissions reduced (tons). If the cost per ton of emissions reduced is less than the maximum required cost effectiveness, then the control method is considered to be cost effective. This section also discusses the updated maximum cost effectiveness values, and those costs, which can be included in the cost effectiveness evaluation.

There are two types of cost effectiveness: average and incremental. Average cost effectiveness considers the difference in cost and emissions between a proposed MSBACT and an uncontrolled case. On the other hand, incremental cost effectiveness looks at the difference in cost and emissions between the proposed MSBACT and alternative control options.

Applicants may also conduct a cost effectiveness evaluation to support their case for the special permit considerations discussed in Chapter 2.

Discounted Cash Flow Method

The discounted cash flow method (DCF) is used in the MSBACT Guidelines. This is also the method used in South Coast AQMD Air Quality Management Plan. The DCF method calculates the present value of the control costs over the life of the equipment by adding the capital cost to the present value of all annual costs and other periodic costs over the life of the equipment. A real interest rate⁴ of four percent, and a 10-year equipment life is used. The cost effectiveness is determined by dividing the total present value of the control costs by the total emission reductions in tons over the same 10-year equipment life.

Maximum Cost Effectiveness Values

The MSBACT maximum cost effectiveness values, shown in Table 5, are based on a DCF analysis with a 4% real interest rate.

⁴ The real interest rate is the difference between market interest rates and inflation, which typically remains constant at four percent.

Table 5: Maximum Cost Effectiveness Criteria (2nd-3rd Quarter 2022-2023)

Pollutant	Average (Maximum \$ per Ton)	Incremental (Maximum \$ per Ton)
ROG	<u>40,797</u> <u>40,854</u>	<u>122,390</u> <u>122,563</u>
NOx	<u>38,575</u> <u>38,630</u>	<u>115,523</u> <u>115,687</u>
SOx	<u>20,398</u> <u>20,427</u>	<u>61,195</u> <u>61,282</u>
PM ₁₀	<u>9,088</u> <u>9,101</u>	<u>27,063</u> <u>27,101</u>
CO	<u>808</u> <u>809</u>	<u>2,323</u> <u>2,326</u>

The cost criteria are based on those adopted by the South Coast AQMD Governing Board in the 1995 BACT Guidelines, adjusted to second-third quarter 2022-2023 dollars using the Marshall and Swift Equipment Cost Index. Cost effectiveness analyses should use these figures adjusted to the latest Marshall and Swift Equipment Cost Index. Contact the BACT Team for current figures.

Top-Down Cost Methodology

The South Coast AQMD uses the top-down approach for evaluating MSBACT and cost effectiveness. This means that the best control method, with the highest emission reduction, is first analyzed. If it is not cost effective, then the second-best control method is evaluated for cost effectiveness. The process continues until a control method is found to be cost-effective. This process provides a mechanism for all practical and potential control technologies to be evaluated. As part of the permitting process, the applicant is responsible for preparing the MSBACT analysis, and submitting it to the District for review and approval.

The top-down process consists of five steps:

1. Identify all control technologies

Identify all possible air pollution control options for the emissions unit. In addition to add-on control, control options may include production process methods and techniques. Innovative, transferable technologies, and LAER technologies should also be identified.

2. Eliminate technically infeasible options

The technologies identified in Step 1 should be evaluated for technical feasibility. Elimination of any of the technologies identified in Step 1 should be well-documented and based on physical, chemical and engineering principles.

3. Rank remaining control technologies

Based on overall control effectiveness, all remaining technically feasible control options should be ranked for the pollutants under review. A list should be generated for each pollutant subject to the MSBACT analysis. This list should include control efficiencies, emission rates, emission reductions, environmental impacts and energy impacts. Environmental impacts may include multimedia impacts and the impacts of the control option on toxic emissions.

4. Evaluation

Evaluate the most effective controls and document the results. For each option, the applicant is responsible for objectively discussing each of the beneficial and adverse impacts. Typically, the analysis should focus on the direct impacts. Calculations for both incremental and average cost effectiveness should be completed during this step. The MSBACT option must be cost effective for both analyses. In the event that the top option from Step 4 is ruled out after the impacts and cost effectiveness are evaluated, the decision and reasoning should be fully documented. The next most stringent alternative from Step 4, should then be evaluated.

5. Select MSBACT

The most effective control option not eliminated in Step 4 is proposed as MSBACT for the pollutant and permit unit and presented to the South Coast AQMD for review and approval.

Costs to Include in a Cost Effectiveness Analysis

Cost effectiveness evaluations consider both capital and operating costs. Capital cost includes not only the price of the equipment, but the cost for shipping, engineering and installation. Operating or annual costs include expenditures associated with utilities, labor and replacement costs. Finally, costs are reduced if any of the materials or energy created by the process result in cost savings. These cost items are shown in Table 6. Methodologies for determining these values are given in documents prepared by U.S. EPA through their Office of Air Quality Planning and Standards (EPA Air Pollution Control Cost Manual, Sixth Edition, 2002, EPA 452/B-02-001).

The cost of land will not be considered because 1) add-on control equipment usually takes up very little space, 2) add-on control equipment does not usually require the purchase of additional land, and 3) land is non-depreciable and has value at the end of the project. In addition, the cost of controlling secondary emissions and cross-media pollutants caused by the primary MSBACT requirement should be included in any required cost effectiveness evaluation of the primary MSBACT requirement.

Table 6: Cost Factors

<u>Total Capital Investment</u>	
<u>Purchased Equipment Cost</u> Control Device Ancillary (including duct work) Instrumentation Taxes Freight	<u>Indirect Installation Costs</u> Engineering Construction and Field Expenses Start-Up Performance Tests Contingencies
<u>Direct Installation Cost</u> Foundations and Supports Handling and Erection Electrical Piping Insulation Painting	
<u>Total Annual Cost</u>	
<u>Direct Costs</u> Raw Materials Utilities - Electricity - Fuel - Steam - Water - Compressed Air Waste Treatment/Disposal Labor - Operating - Supervisory - Maintenance Maintenance Materials Replacement Parts	<u>Indirect Costs</u> Overhead Property Taxes Insurance Administrative Charges <u>Recovery Credits</u> Materials Energy

CLEAN FUEL GUIDELINES

In January 1988, the South Coast AQMD Governing Board adopted a Clean Fuels Policy that included a requirement to use clean fuels as part of BACT. A clean fuel is one that produces air emissions equivalent to or lower than natural gas for NO_x, SO_x, ROG, and fine respirable particulate matter (PM₁₀). Besides natural gas, other clean fuels are liquid petroleum gas (LPG), hydrogen and electricity. Utilization of zero and near- zero emission technologies are also integrated into the Clean Fuels Policy. The burning of landfill, digester, refinery and other by-product gases is not subject to the clean fuels requirement. However, the combustion of these fuels must comply with other South Coast AQMD rules, including the sulfur content of the fuel.

The requirement of a clean fuel is based on engineering feasibility. Engineering feasibility considers the availability of a clean fuel and safety concerns associated with that fuel. Some state and local safety requirements limit the types of fuel, which can be used for emergency standby purposes. Some fire departments or fire marshals do not allow the storage of LPG near occupied buildings. Fire officials have, in some cases, vetoed the use of methanol in hospitals. If special handling or safety considerations preclude the use of the clean fuel, the South Coast AQMD has allowed the use of fuel oil as a standby fuel in boilers and heaters, fire suppressant pump engines and for emergency standby generators. The use of these fuels must meet the requirements of South Coast AQMD rules limiting NO_x and sulfur emissions. In addition, the Clean Fuel requirements for MSBACT are subject to the provisions of California Health and Safety Code Section 40440.11.

AIR QUALITY-RELATED ENERGY POLICY

In September 2011, the South Coast AQMD Governing Board adopted an air quality-related energy policy to help guide a unified approach to reducing air pollution while addressing other key environmental concerns including environmental justice, climate change and energy independence. The air quality-related energy policy outlines 10 policies and 10 action steps to help meet federal health-based standards for air quality in the South Coast Air Basin while also promoting the development of zero- and near-zero emission technologies.

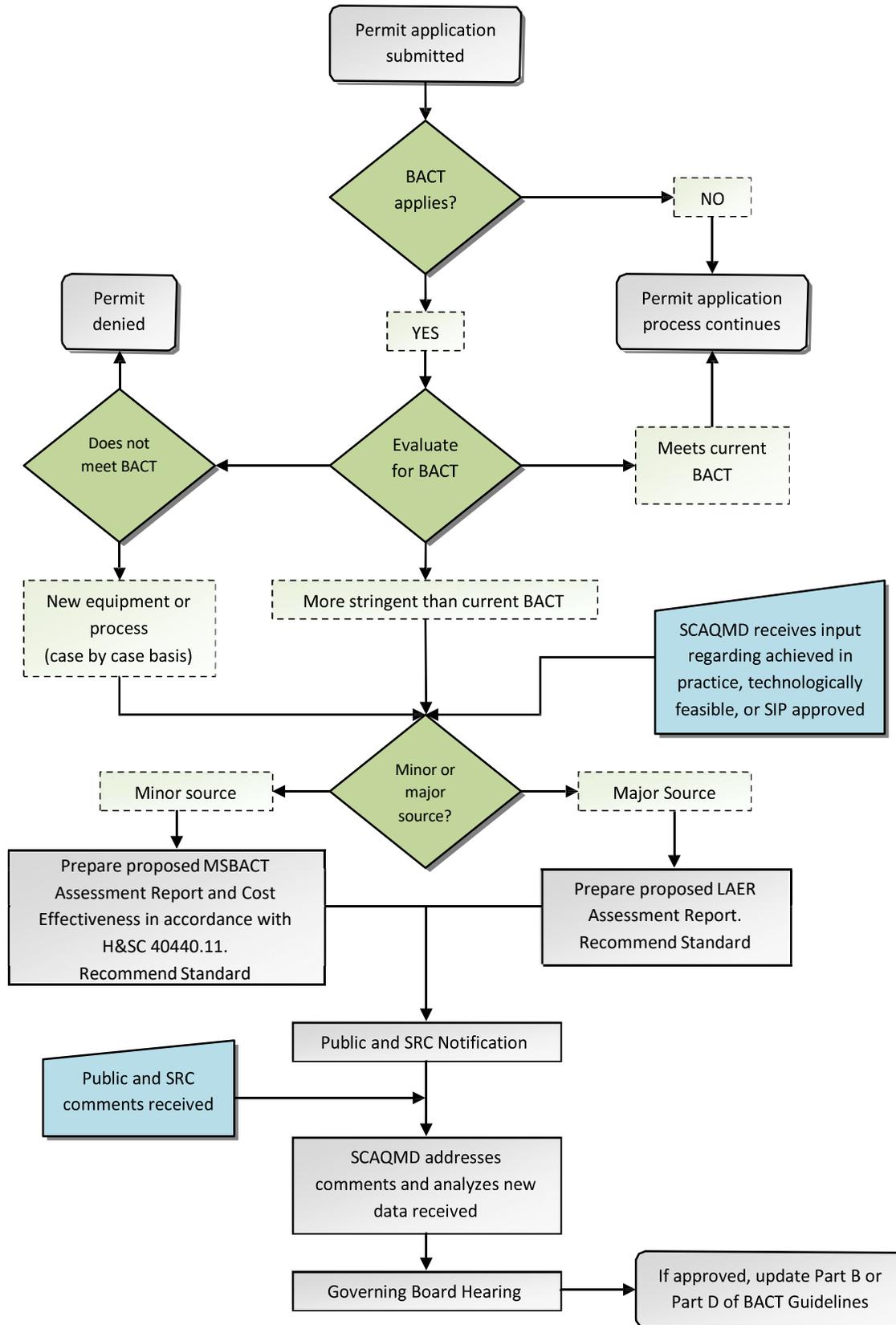
Policy 7 is to require any new/repowered in-Basin fossil-fueled generation power plant to incorporate BACT/LAER as required by District rules, considering energy efficiency for the application. These power plants will need to comply with any requirements adopted by the California Air Resources Board, California Energy Commission, Public Utilities Commission, California Independent System Operator, or the governing board of a publicly-owned electric utility, as well as state law under the California Environmental Quality Act. In recognizing that fossil fuel electric generation will still be needed in the Basin to complement projected increased use of renewable energy sources, this policy ensures that all fossil-fueled plants will meet existing BACT/LAER requirements and South Coast AQMD's BACT/LAER determinations will also take into consideration generating efficiency in setting the emission limits. Parts E and F of the BACT Guidelines complement and support this policy.

MSBACT UPDATE PROCESS

As technology advances, the South Coast AQMD's MSBACT Part D Guidelines will be updated. Updates will include revisions to the guidelines for existing equipment categories, as well as new guidelines for new categories.

The MSBACT Guidelines will be revised based on the criteria outlined in the previous sections. Once a more stringent emission limit or control technology has been reviewed by staff and is determined to meet the criteria for MSBACT, it will be reviewed through a public process. The process is shown schematically in Figure 2. The public will be notified and the BACT Scientific Review Committee will have an opportunity to comment. Following the public process and comment period, the guidelines will be presented to the Governing Board for approval at a public hearing, prior to updates of the MSBACT Guidelines, Part D.

Figure 2: The Ongoing BACT Update Process



Chapter 2 - How to Use Part D of the MSBACT Guidelines

This chapter explains the MSBACT information found in Part D - MSBACT Guidelines. The Guidelines in Part D should be used to determine MSBACT for non-major polluting facilities. For a listing of equipment, refer to the Part D Table of Contents. Determination of MSBACT for equipment not found in Part D of the MSBACT Guidelines is also explained.

GENERAL

Part D includes MSBACT Guidelines for more than 100 categories of equipment commonly processed by South Coast AQMD. Some guidelines are further subdivided by equipment size, rating, type or the material used, as appropriate.

The MSBACT requirements are in the form of:

- 1) an emission limit;
- 2) a control technology;
- 3) equipment requirements; or
- 4) a combination of the last two.

If the requirement is an emission limit, the applicant may choose any control technology to achieve the emission limit. The South Coast AQMD prefers to set an emission limit as MSBACT because it allows an applicant the most flexibility in reducing emissions.

If a control technology and/or equipment requirements are the only specified MSBACT, then either emissions from the equipment are difficult to measure or it was not possible to specify an emission limit that applies to all equipment within the category. Where possible, an emission limit or control efficiency condition will be specified in the permit along with the control technology or equipment requirements to ensure that the equipment is properly operated with the lowest emissions achievable. An applicant may still propose to use other ways to achieve the same or better emission reduction than the specified MSBACT.

MSBACT is the control technology or emission limit given in Part D for the basic equipment or process being evaluated, unless the guideline is out of date, or there are special permitting conditions, or the equipment is not identified in Part D. In those cases, the procedures described in the following sections will be used to determine MSBACT. Applicants or other interested parties are encouraged to contact the South Coast AQMD permitting staff if there are any questions about MSBACT.

SPECIAL PERMITTING CONSIDERATIONS

Although the most stringent, AIP BACT for a source category will most likely be the required MSBACT, South Coast AQMD staff may consider special technical circumstances that apply to the proposed equipment which may allow deviation from that MSBACT. The permit applicant should bring any pertinent facts to the attention of the South Coast AQMD permitting engineer for consideration.

Case-Specific Situations

South Coast AQMD staff may consider unusual equipment-specific and site-specific characteristics of the proposed project that would warrant a reconsideration of the MSBACT requirement for new equipment.

Technical infeasibility of the control technology

A particular control technology may not be required as MSBACT if the applicant demonstrates that it is not technically feasible to install and operate it to meet a specific MSBACT emission limitation in a specific permitting situation.

Operating schedule and project length

If the equipment will operate much fewer hours per year than what is typical, or for a much shorter project length, it can affect what is considered AIP.

Availability of fuel or electricity

Some MSBACT determinations may not be feasible if a project will be located in an area where natural gas or electricity is not available.

Process requirements

Some MSBACT determinations specify a particular type of process equipment. South Coast AQMD staff may consider requirements of the proposed process equipment that would make the MSBACT determination not technically feasible.

Equivalency

The permit applicant may propose alternative means to achieve the same emission reduction as required by BACT. For example, if BACT requires a certain emission limit or control efficiency to be achieved, the applicant may choose any control technology, process modification, or combination thereof that can meet the same emission limit or control efficiency.

Super Compliant Materials

South Coast AQMD will accept the use of super compliant materials in lieu of an add-on control device controlling volatile organic compound (VOC) emissions from coating operations. For example, if a permit applicant uses only surface coatings that meet the super compliant material definition in South Coast AQMD Rule 109, it may qualify as VOC MSBACT. This policy does not preclude any other MSBACT requirement for other contaminants.

Equipment Modifications

As a general rule, it is more difficult to retrofit existing equipment with MSBACT as a result of NSR modification when compared to a new source. The equipment being modified may not be compatible with some past MSBACT determinations that specify a particular process type. There may also be space restrictions that prevent installation of some add-on control technology.

Other Considerations

Although multiple process and control options may be available during the MSBACT determination process, considerations should be made for options that reduce the formation of air contaminants from the process, as well as ensuring that emissions are properly handled. In addition to evaluating the efficiency of the control stage, these additional considerations are needed to ensure that the system is capable of reducing or eliminating emissions from the facility on a consistent basis during the operational life of the equipment. Measures listed in this section for MSBACT are subject to the requirements of California Health and Safety Code Section 40440.11.

Pollution Prevention

The Pollution Prevention Act of 1990 (42 U.S.C. §§13101-13109) established a national policy that pollution should be prevented or reduced at the source whenever feasible. In many cases, air pollution control is a process that evaluates contaminants at the exhaust of the system. Pollution prevention is the reduction or elimination of waste at the source by the modification of the production process. Pollution prevention measures may consist of the use of alternate or reformulated materials, a modification of technology or equipment, or improvement of energy efficiency changes that result in an emissions reduction. These measures should be considered as part of the MSBACT determination process if the measures will result in the elimination or reduction of emissions, but are not required to include projects which are considered to fundamentally redefine the source. New and different emissions created by a process or material change will also need to be considered as part of the MSBACT determination process, in contrast to the overall emissions reductions from the implementation of pollution prevention measures.

U.S. EPA policy defined pollution prevention as source reduction and other practices that reduce or eliminate the creation of pollutants through increased efficiency in the use of raw materials, energy, water, or other resources, and protection of natural resources by conservation⁵. U.S. EPA further specifies that pollution prevention does not include recycling (except in-process recycling), energy recovery, treatment or disposal. For purposes of these BACT Guidelines, and to be consistent with federal definitions, source reduction and pollution prevention shall ~~may~~ include, but not be limited to, consideration of the feasibility of:

- equipment or technology modifications,
- process or procedure modifications,
- reformulation or redesign of products,
- substitution of raw materials, or
- improvements in housekeeping, maintenance or inventory control,

that reduce the amount of air contaminants entering any waste stream or otherwise released into the environment, including fugitive emissions.

February 2, 2024

⁵ U.S. EPA Pollution Prevention Law and Policies (www.epa.gov/p2/pollution-prevention-law-and-policies#define)
BACT GUIDELINES – PART C

Monitoring and Testing

In order to ensure that MSBACT determinations continue to meet their initial emission and efficiency standards, periodic or continuous parameter monitoring and testing requirements may be required during the permitting process. Equipment and processes may experience some change over time, due to aging or operational methods of the equipment, which may affect emission rates or control efficiencies. In addition to other rule requirements, additional monitoring and testing requirements may need to focus on aspects directly related to the MSBACT determination, and may be made enforceable by permit conditions. Monitoring and testing requirements should be specific to characterize operating conditions (e.g. temperatures, pressures, flows, production rates) and measurement techniques when MSBACT is established to ensure clarity and consistency with the standard.

Capture Efficiency

An integral part of controlling air pollutants emitted from a process with add-on air pollution control equipment is capturing those emissions and directing them to the air pollution control device. Emissions which are designed to be collected by an exhaust system but are vented uncontrolled into the atmosphere can have a much greater impact than controlled emissions. When applicable, the evaluation of a process and its associated control equipment should address the qualification and quantification of capture efficiency. By addressing capture efficiency during MSBACT determinations, a standard can be established to evaluate the capture efficiency of other systems, as well as ensure that the capture efficiency is maintained consistently over time.

If applicable, MSBACT determinations may include the percentage capture efficiency and the methods and measurements (e.g. EPA Method 204, capture velocity measurements, design using ACGIH's Industrial Ventilation, static pressures) used to determine and verify it. For various circumstances, several South Coast AQMD rules (see Table 5, Part A, Chapter 1) already require an assessment of collection efficiency of an emission control system following EPA Method 204, EPA's "Guidelines for Determining Capture Efficiency", South Coast AQMD's "Protocol for Determination of Volatile Organic Compounds (VOC) Capture Efficiency," or other methods approved by the Executive Officer, and are appropriate to include as BACT requirements. The capture efficiency for any MSBACT Determination shall be no less stringent than any applicable rule requirement. Other considerations that may affect capture, such as cross-drafts, thermal drafts and the volume of combustion products, should also be addressed during this process.

Equipment Not Identified in the MSBACT Guidelines

Although the BACT Guidelines contains an extensive listing of practically everything the South Coast AQMD 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 South Coast AQMD 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.

MSBACT Determinations Should the Guidelines Become Out of Date

Should the MSBACT Guideline Part D become out of date with state BACT requirements or permits issued for similar equipment in other parts of the state, staff will evaluate permits consistent with the definition of BACT considering technical and economic criteria as required by Rule 1303 (a) and Health & Safety Code Section 40405. The technical and economic factors to be considered are those identified in Chapter 1.

MSBACT APPLICATION CUT-OFF DATES

These guidelines apply to all non-major polluting facility applications deemed complete subsequent to South Coast AQMD Governing Board adoption of the Regulation XIII amendments in 2000.

Applications for a Registration Permit for equipment issued a valid Certified Equipment Permit (CEP), which is valid for one year, will only be required to comply with MSBACT as determined at the time the CEP was issued. However, South Coast AQMD staff will reevaluate the MSBACT requirements for the CEP upon annual renewal of the CEP by the equipment manufacturer.

ATTACHMENT F

Part D - South Coast AQMD BACT Determination



Source Type: **Minor**
 Application No.: **622272 and 628304**
 Equipment Category: **Asphalt Oil Blending**
 Equipment Subcategory: **Crumb Rubber Asphalt Blending**
 Date: **February 2, 2024**

1. EQUIPMENT INFORMATION

A. MANUFACTURER: -	B. MODEL: -	
C. DESCRIPTION: Asphaltic concrete is produced using a mixture of asphalt oil and crumb rubber, in lieu of only asphalt oil. The crumb rubber/asphalt blending system includes a mixing tank and a secondary mixing/storage tank which are vented to air pollution control equipment. The air pollution control equipment includes a condenser, steel wool, and electrostatic precipitator (ESP) for each tank.		
D. FUNCTION: Trion T1300 ESP vents mixing tank and Trion T2600 ESP vents secondary mixing/storage tank to a common carbon adsorber to reduce VOC emissions.		
E. SIZE/DIMENSIONS/CAPACITY: -		
COMBUSTION SOURCES		
F. MAXIMUM HEAT INPUT: N/A		
G. BURNER INFORMATION: N/A		
TYPE	INDIVIDUAL HEAT INPUT	NUMBER
-	-	-
H. PRIMARY FUEL: -		I. OTHER FUEL: -
J. OPERATING SCHEDULE: 8 HRS/DAY 6 DAYS/WEEK 52 WKS/YR		
K. EQUIPMENT COST: The summary of costs evaluation report is attached.		
L. EQUIPMENT INFORMATION COMMENTS: -		

2. COMPANY INFORMATION

A. COMPANY: All American Asphalt	B. FAC ID: 82207
C. ADDRESS: 10671 Jeffrey Rd. CITY: Irvine STATE: CA ZIP: 92602	D. NAICS CODE: 324121
E. CONTACT PERSON: Danny Stinson	F. TITLE: Plant Manager
G. PHONE NO.: (951) 736-7600	H. EMAIL: DSTINSON@ALLAMERICANASPHALT.COM

3. PERMIT INFORMATION

A. AGENCY: South Coast AQMD	B. APPLICATION TYPE: NEW CONSTRUCTION
C. SCAQMD ENGINEER: Todd Iwata	
D. PERMIT INFORMATION: PC ISSUANCE DATE: 8/27/21 P/O NO.: G66229 PO ISSUANCE DATE: 8/27/2021	
E. START-UP DATE: 2/18/2021	
F. OPERATIONAL TIME: + 2 years	

4. EMISSION INFORMATION

A. BACT EMISSION LIMITS AND AVERAGING TIMES: .						
	VOC	NOx	SOx	CO	PM OR PM₁₀	INORGANIC
BACT Limit						
Averaging Time						
Correction						
B. OTHER BACT REQUIREMENTS: -						
C. BASIS OF THE BACT/LAER DETERMINATION: Achieved in Practice/New Technology						
D. EMISSION INFORMATION COMMENTS: -						

5. CONTROL TECHNOLOGY

A. MANUFACTURER: Envent Corporation		B. MODEL: EC-2000	
C. DESCRIPTION: Carbon adsorber with two canisters in series were installed to control VOC emissions and odor from two electrostatic precipitators which in turn control emissions from one mixing tank and a secondary/storage tank of crumb rubber/asphalt oil blending system.			
D. SIZE/DIMENSIONS/CAPACITY: Each canister has 2000 pounds of activated carbon, 3'-9.5" diameter x 7'-10" height			
E. CONTROL EQUIPMENT PERMIT INFORMATION: APPLICATION NO.: 628304 PC ISSUANCE DATE: Same PO NO.: Same PO ISSUANCE DATE: Same			
F. REQUIRED CONTROL EFFICIENCIES:			
CONTAMINANT	OVERALL CONTROL EFFICIENCY	CONTROL DEVICE EFFICIENCY	COLLECTION EFFICIENCY
VOC	__90__%	__%	__%
NOx	__%	__%	__%
SOx	__%	__%	__%
CO	__%	__%	__%
PM	__%	__%	__%
PM ₁₀	__%	__%	__%
INORGANIC	__%	__%	__%
G. CONTROL TECHNOLOGY COMMENTS: -			

6. DEMONSTRATION OF COMPLIANCE

A. COMPLIANCE DEMONSTRATED BY: Source test		
B. DATE(S) OF SOURCE TEST: March 17-19, 2021		
C. COLLECTION EFFICIENCY METHOD: -		
D. COLLECTION EFFICIENCY PARAMETERS: -		
E. SOURCE TEST/PERFORMANCE DATA:		
	Inlet Concentration (ppmvd)	Outlet Concentration (ppmvd)
Total gaseous non-Methane/Ethane organics	591.0	11.2
Sulfur	3.9	0.05
	Inlet Emission Rate (lb/hr)	Outlet Emission Rate (lb/hr)
Total gaseous non-Methane/Ethane organics	0.97	0.02
Sulfur	0.014	Lower than detection limit

<p>F. TEST OPERATING PARAMETERS AND CONDITIONS:</p> <p>Permit Condition 7) The operator shall replace the carbon in the primary canister with either (1) fresh carbon or (2) redirect the total incoming flow from the electrostatic precipitators to the secondary canister and replace the carbon in the primary canister and place it in the secondary position after the control efficiency of the primary canister is less than 90%. The control efficiency shall be determined using the Total Organic Compound (TOC) concentrations measured on the same day pursuant to condition no. 6 and the following equation:</p> $\text{Control efficiency} = (1 - \text{Outlet Concentration of Primary Canister} / \text{Inlet Concentration of Primary Canister}) * 100$ <p>Permit Condition 8) The operator shall replace the carbon in the secondary canister before the control efficiency of the secondary canister is less than 90%.</p> <p>Permit Condition 9) The operator shall complete total carbon replacement within 7 business days after the control efficiency of the primary canister is less than 90%.</p> <p>Permit Condition 10) Spent carbon removed from the system shall be stored in closed canisters prior to disposal or regeneration. If disposed, disposal shall be in accordance with applicable hazardous materials rules and regulations.</p>
<p>G. TEST METHODS (SPECIFY AGENCY): South Coast AQMD method 25.3</p>
<p>H. MONITORING AND TESTING REQUIREMENTS: .</p> <p>Permit Condition 6) The operator shall measure the Total Organic Compound (TOC) concentration at the inlet and outlet of the primary and secondary canisters using a photoionization or any other South Coast AQMD-approved organic vapor analyzer calibrated in parts per million by volume (ppmv) as hexane. If another calibrating agent is used, it shall be correlated to and expressed as hexane. The analyzer shall meet EPA Method 21 requirements. Calibration of the analyzer shall be performed prior to each measuring day. Measurements shall be made at least once every 14 days the crumb rubber/asphalt oil blending system is operated.</p>
<p>I. DEMONSTRATION OF COMPLIANCE COMMENTS: -</p>

7. ADDITIONAL SCAQMD REFERENCE DATA

A. BCAT: 286100	B. CCAT: 1B	C. APPLICATION TYPE CODE: -	
D. RECLAIM FAC? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	E. TITLE V FAC: YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	F. SOURCE TEST ID(S): PR21000	
G. SCAQMD SOURCE SPECIFIC RULES:			
H. HEALTH RISK FOR PERMIT UNIT			
H1. MICR: -	H2. MICR DATE: -	H3. CANCER BURDEN: -	H4. CB DATE: -
H5: HIA: -	H6. HIA DATE: -	H7. HIC: -	H8. HIC DATE: -

ATTACHMENT F

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Best Available Control Technology Guidelines

Part D: BACT Guidelines for Non-Major Polluting Facilities

- October 20, 2000 (Revised June 6, 2003; December 5, 2003; July 9, 2004; December 3, 2004; July 14, 2006; October 3, 2008; December 2, 2016; February 2, 2018; February 1, 2019; February 5, 2021; September 2, 2022; February 2, 2024)

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Equipment or Process: Abrasive Blasting – Enclosed

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All					Baghouse; or Cartridge Dust Collector (07-11-97)	

* Means those facilities that are minor facilities as defined by Rule 1302 - Definitions

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Equipment or Process: Absorption Chiller

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All		≤ 20 ppmv dry corrected to 3% O ₂ (10-20-2000)	Natural Gas (10-20-2000)	≤50 ppmv for firtube type, ≤ 100 ppmv for watertube type, dry corrected to 3% O ₂ (10-20-2000)	Natural Gas (10-20-2000)	

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Equipment or Process: Air Stripper – Ground Water Treatment

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All	Carbon Adsorber, Thermal Oxidizer, or Catalytic Oxidizer (10-20-2000)					

* Means those facilities that are minor facilities as defined by Rule 1302 - Definitions

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10-20-2000 Rev. 0

2-1-2019 Rev 1

Equipment or Process: Aluminum Melting Furnace

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Crucible or Pot		≤60 ppm Compliance with Rule 1147 (2-1-2019)	Natural Gas (07-11-97)		Natural Gas with Ingots or Non-contaminated Scrap Charge, or Baghouse (10-20-2000)	
Reverberatory, Non-Sweating < 5 MM BTU/HR		≤60 ppm Compliance with Rule 1147 (2-1-2019)	Natural Gas (1990)		Same as above. (10-20-2000)	
Reverberatory, Non-Sweating ≥ 5 MM BTU/HR		Natural Gas with Low NO _x Burner ≤ 60 ppmvd @ 3% O ₂ (10-20-2000)	Natural Gas (1990)		Same as above. (10-20-2000)	
Reverberatory or Rotary, Sweating < 5 MM BTU/HR	Afterburner (≥ 0.3 sec. Retention Time at ≥ 1400° F) or Secondary Combustion Chamber (1990)	≤60 ppm Compliance with Rule 1147 (2-1-2019)	Natural Gas (1990)		Natural Gas with Baghouse and: - Afterburner (≥ 0.3 sec. Retention Time at ≥ 1400° F); or - Secondary Combustion Chamber (1990)	
Reverberatory or Rotary, Sweating ≥ 5 MM BTU/HR	Same as Above (1990)	Natural Gas with Low NO _x Burner ≤ 60 ppmvd @ 3% O ₂ (10-20-2000)	Natural Gas (1990)		Same as above. (1990)	

Note: Some of this equipment may also subject to 40 CFR 63, Subpart RRR – National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production

* Means those facilities that are minor facilities as defined by Rule 1302 - Definitions

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Equipment or Process: Ammonium Bisulfate and Thiosulfate Production

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All					Packed Column Scrubber with Heat Exchanger and Mist Eliminator (1990)	Packed Column Scrubber for NH ₃ (1990)

* Means those facilities that are minor facilities as defined by Rule 1302 - Definitions

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Equipment or Process: Asbestos Machining Equipment

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All					Air Cleaning Equipment (40 CFR Part 61 Subpart M) (07-11-97)	

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Equipment or Process: Asphalt Batch Plant

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All		Natural Gas with Low NO _x Burner ≤ 33 ppmvd @ 3% O ₂ (10-20-2000)			Baghouse (1990)	

* Means those facilities that are minor facilities as defined by Rule 1302 - Definitions

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Equipment or Process: Asphalt Roofing Line

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All		Natural Gas (1990)	Natural Gas (1990)		Natural Gas with High Velocity Filter and Mist Eliminator (1990)	

* Means those facilities that are minor facilities as defined by Rule 1302 - Definitions

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Equipment or Process: Asphaltic Day Tanker

	Criteria Pollutants					
Rating/Size	VOC	NO_x	SO_x	CO	PM₁₀	Inorganic
All					Fiberglass or Steel Wool Filter (07-11-97)	

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Equipment or Process: Auto Body Shredder

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All					Baghouse with Water Sprays in Hammermill (1988)	

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Equipment or Process: Ball Mill

	Criteria Pollutants					
Rating/Size	VOC	NO_x	SO_x	CO	PM₁₀	Inorganic
All					Baghouse (07-11-97)	

* Means those facilities that are minor facilities as defined by Rule 1302 - Definitions

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Equipment or Process: Beryllium Machining Equipment

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All					High Efficiency Particulate Air Filter and Compliance with 40CFR Part 61, Subpart D (1988)	

* Means those facilities that are minor facilities as defined by Rule 1302 - Definitions

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10-20-2000 Rev. 0
 10-03-2008 Rev. 1
 12-02-2016 Rev. 2
 2-1-2019 Rev. 3

Equipment or Process: Boiler

Subcategory/Rating/Size	Criteria Pollutants					Inorganic
	VOC	NOx ¹	SOx	CO	PM ₁₀	
Natural Gas Fired, > 2 and < 20 MMBtu/HR		Compliance with Rules 1146 or 1146.1 ² (12-02-2016)	Natural Gas (10-20-2000)	≤50 ppmvd for firetube type, ≤ 100 ppmvd for watertube type, corrected to 3% O ₂ (04-10-98)	Natural Gas (04-10-98)	
Propane Fired, > 2 and < 20 MMBtu/HR		≤ 12 ppmvd corrected to 3% O ₂ ² (10-20-2000)		≤50 ppmvd for firetube type, ≤ 100 ppmvd for watertube type, corrected to 3% O ₂ (04-10-98)		
Natural Gas or Propane Fired, ≥ 20 and < 75 MMBtu/HR		Compliance with Rule 1146 (2-1-2019)	Natural Gas (10-20-2000)	Same as above. (04-10-98)	Natural Gas (04-10-98)	With Add-On Controls: ≤ 5 ppmvd NH ₃ , corrected to 3% O ₂ ≤ 1 ppmvd ozone, corrected to 3% O ₂ (10-20-2000)
Natural Gas or Propane Fired, ≥ 75 MM Btu/HR		Compliance with Rule 1146 (12-02-2016)	Natural Gas (10-20-2000)	Same as above. (04-10-98)	Natural Gas (04-10-98)	With Add-On Controls: ≤ 5 ppmvd NH ₃ , corrected to 3% O ₂ ≤ 1 ppmvd ozone, corrected to 3% O ₂ (10-20-2000)

* Means those facilities that are minor facilities as defined by Rule 1302 - Definitions

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Subcategory/Rating/ Size	Criteria Pollutants					
	VOC	NO _x ¹	SO _x	CO	PM ₁₀	Inorganic
Oil Fired ³		Compliance with Rule 1146 or 1146.1 (10-20-2000)	Fuel Sulfur Content ≤ 0.0015% by weight (10-03-2008)	≤ 50 ppmvd for firetube type ≤ 100 ppmvd for watertube type, corrected to 3% O ₂ (04-10-98)		
Atmospheric Unit, ≥ 2 and ≤ 10 MMBtu/HR		Compliance with Rules 1146 and 1146.1 (12-02-2016)		Compliance with Rules 1146 and 1146.1 (12-02-2016)		
Landfill Gas Fired, < 75 MMBTU/Hr		Compliance with Rules 1146 and 1146.1 (12-02-2016)		≤ 100 ppmvd at 3% O ₂ dry. (04-10-98)	≤ 0.1 gr/scf at 12% CO ₂ (Rule 409) (04-10-98)	
Digester Gas Fired, < 75 MMBTU/Hr		Compliance with Rules 1146 and 1146.1 (12-02-2016)		≤ 100 ppmvd at 3% O ₂ dry. (04-10-98)	≤ 0.1 gr/scf at 12% CO ₂ (Rule 409) (04-10-98)	

- 1) Electric utility boilers, refinery boilers rated >40 MMBtu/hr and sulfur plant reaction boilers rated ≥5 MMBtu/hr are excluded; and there are exceptions for low-use boilers and boilers that met a 12-ppm limit prior to 9/5/08. Applicants are advised to review these rules for further details.
- 2) A higher NO_x limit may be allowed for facilities required to have a standby fuel, where use of a clean standby fuel is not possible and an ultra low-NO_x burner is not available.
- 3) See Clean Fuels Policy in Part C of the BACT Guidelines. Oil firing is only allowed as a standby fuel, and where use of a clean standby fuel is not possible.

* Means those facilities that are minor facilities as defined by Rule 1302 - Definitions

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Equipment or Process: Brakeshoe Debonder

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All	Afterburner or Secondary Combustion Chamber with ≥ 0.3 Second Retention Time at ≥1400°F Achieved within 15 Minutes of Primary Burner Ignition (07-11-97)	Natural Gas (07-11-97)	Natural Gas (07-11-97)		Natural Gas (07-11-97)	

* Means those facilities that are not major polluting facilities as defined by Rule 1302 - Definitions

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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Equipment or Process: Brass Melting Furnace

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NOx	SOx	CO	PM ₁₀	
Crucible, ≤ 300 Lbs/Hr Process Rate		60 ppm Compliance with Rule 1147 (2-1-2019)	Natural Gas (1990)		Natural Gas, Charge Clean Metal Only and Maintain Slag Cover Over Entire Melt Surface (1990)	
Crucible, > 300 Lbs/Hr Process Rate		60 ppm Compliance with Rule 1147 (2-1-2019)	Natural Gas (1990)		Natural Gas, with Baghouse (1990)	
Reverberatory or Rotary, Non- Sweating		60 ppm Compliance with Rule 1147 (2-1-2019)	Natural Gas (1990)		Natural Gas with Baghouse (1990)	
Reverberatory or Rotary, Sweating	Afterburner (≥ 0.3 Second Retention Time at ≥ 1400 °F) (1990)	60 ppm Compliance with Rule 1147 (2-1-2019)	Natural Gas (1990)	Afterburner (≥ 0.3 Second Retention Time at ≥ 1400 °F) (1990)	Natural Gas with Baghouse (1990)	
Tilting Induction, ≤ 300 Lbs/Hr Process Rate					Charge Clean Metal Only and Slag Cover Maintained Over Entire Melt Surface (1988)	

* Means those facilities that are not major polluting facilities as defined by Rule 1302 - Definitions

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Equipment or Process: Brass Melting Furnace

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Tilting Induction, > 300 Lbs/Hr Process Rate					Baghouse (7-11-97)	

* Means those facilities that are not major polluting facilities as defined by Rule 1302 - Definitions

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Equipment or Process: Bulk Solid Material Handling – Other

Subcategory ³⁾ /Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Animal Feed Mfg. – Dry Material Handling					Baghouse (07-11-97)	
Clay, Ceramics and Refractories Handling (Except Mixing)					Baghouse (1988)	
Coal, Coke and Sulfur Handling					Compliance with Rule 1158 (10-20-2000)	
Feed and Grain Handling					Baghouse (1988)	
Natural Fertilizer Handling ¹⁾					Baghouse or Equivalent Material Moisture (07-11-97)	
Paper and Fiber Handling					High Efficiency Cyclone with Baghouse (10-20-2000)	
Pneumatic Conveying, Except Paper and Fiber					Baghouse (1988)	
Railcar Dumper					Enclosed Dump Station and Water Spray for Wet Material (1988)	
Other Dry Materials Handling ²⁾					Enclosed Conveyors and Baghouse (7-11-97)	
Other Wet Materials Handling ²⁾					Water Spray or Adequate Material Moisture (1988)	

1. Includes conveying, size reduction, classification and packaging.
2. Includes conveying, size reduction and classification.
3. Also see Catalyst Manufacturing, Coffee Roasting, Non-Metallic Mineral Processing, Nut Roasting, Rendering, Pharmaceutical Operations, and Rock-Aggregate Processing for other bulk solid material handling.

* Means those facilities that are not major polluting facilities as defined by Rule 1302 - Definitions

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Equipment or Process: Bulk Solid Material Ship Loading

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Non-White Commodities					Enclosed Conveyor and - Water Spray; or - Adequate Material Moisture (1988)	
White Commodities					Enclosed Conveyor and Baghouse Venting Ship Holds and Transfer Points (07-11-97)	

Notes:

1. Non-White commodities include coal, copper concentrate, sulfur, iron slag, iron ore, iron pellets, green petroleum coke and other wet commodities
2. White commodities include soda ash, salt cake, potash and other dry commodities.

* Means those facilities that are not major polluting facilities as defined by Rule 1302 - Definitions

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Equipment or Process: Bulk Solid Material Ship Unloading

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO_x	SO_x	CO	PM₁₀	
Bulk Cement		Shore Utility Power (1988)	Shore Utility Power (1988)		Enclosed, Self-Unloading Ship (1988)	
Other Bulk Solid Materials					Enclosed Hold and Baghouse; or Material Moisture Equivalent to an Enclosed Hold and Baghouse (1988)	

* Means those facilities that are not major polluting facilities as defined by Rule 1302 - Definitions

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Equipment or Process: Bulk Solid Material Storage

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Coal, Petroleum Coke, Sulfur					Enclosed Storage in Compliance with Rule 1158 (10-20-2000)	
Other Non-White Commodities					Water Spray and Chemical Additives or Charged Fog Spray (1988)	
White Commodities					Enclosed Storage and Baghouse (1988)	
Storage Tanks and Silos					Baghouse or Filtered Vent for Dry Material; Water Spray or Adequate Moisture for Wet Material (07-11-97)	
Other Open Storage					Water with Chemical Additives (1988)	

Notes:

1. Other non-white commodities include copper concentrate, iron slag, iron ore, and iron pellets.
2. White commodities include cement, gypsum, lime, soda ash, borax and flour.

* Means those facilities that are not major polluting facilities as defined by Rule 1302 - Definitions

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2-1-2019 Rev 1

Equipment or Process: Burnoff or Burnout Furnace (Excluding Wax Furnace)

Rating/Size	Criteria Pollutants					
	VOC	NO _x	SO _x	CO	PM ₁₀	Inorganic
All	Afterburner or Secondary Combustion Chamber with ≥ 0.3 Second Retention Time at ≥1400°F Achieved within 15 Minutes of Primary Burner Ignition (07-11-97)	Compliance with Rule 1147 (2-1-2019)	Natural Gas (07-11-97)		Natural Gas (07-11-97)	

* Means those facilities that are not major polluting facilities as defined by Rule 1302 - Definitions

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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2-1-2019 Rev 1

Equipment or Process: Calciner

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Petroleum Coke	Afterburner (≥ 0.3 Second Retention Time at ≥ 1400 °F) (1988)	Compliance with Rule 1147 (2-1-2019)	Natural Gas with Flue Gas Desulfurization (> 90% Removal Efficiency) (1988)	Afterburner (≥ 0.3 Second Retention Time at ≥ 1400 °F) (1988)	0.005 gr/dscf Corrected to 3% O ₂ (1988)	
Other		Compliance with Rule 1147 (2-1-2019)	Natural Gas (1988)		Natural Gas with Baghouse (1988)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Carpet Beating and Shearing

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All					Baghouse (1988)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Catalyst Manufacturing and Regeneration

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Calcining		Three-Stage NO _x Reduction Scrubber (1990)	Natural Gas (1990)		Baghouse (10-20-2000)	
Reactor		NO _x Scrubber (07-11-97)				
Rotary or Spray Dryer					Baghouse (07-11-97)	
Regeneration, Hydrocarbon Removal	Flare, Firebox, or Afterburner (≥ 0.3 Second Retention Time at ≥ 1400 °F) (07-11-97)					
Catalyst Solids Handling					Baghouse (07-11-97)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Charbroiler, Chain-driven (conveyorized)

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All	Catalytic Oxidizer (12-12-97)				Catalytic Oxidizer (12-12-97)	

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10-20-2000 Rev. 0

Equipment or Process: Chip Dryer

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All	Afterburner (≥ 0.3 Sec. Retention Time at ≥ 1400°F) (10-20-2000)	Natural Gas with Low NO _x Burner (10-20-2000)	Natural Gas (1989)		Natural Gas with: - Baghouse and Limestone Filter Coating; or - Baghouse and Afterburner (≥ 0.3 Sec. Retention Time at ≥ 1400°F) (1989)	

Note: This equipment may also subject to 40 CFR 63, Subpart RRR – National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Circuit Board Etcher

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO_x	SO_x	CO	PM₁₀	
Batch Immersion Type, Subtractive Process					Packed Water Scrubber and Etchant Solution Temperature Control (10-20-2000)	
Conveyorized Spray Type, Subtractive Process					Packed Water Scrubber and Etchant Solution Temperature Control (1988)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Cleaning Compound Blender

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All					Baghouse or Wet Centrifugal Collector or Cyclone (07-11-97)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0
 2-1-2019 Rev. 1
 2-5-2021 Rev. 2

Equipment or Process: Coffee Roasting

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Roaster < 110,000 BTU/Hr			Natural Gas (1988)		Natural Gas (1988)	
Roaster ≥ 110,000 BTU/Hr	Afterburner ¹ (0.3 Sec Retention Time at 1200 °F) (1990)		Natural Gas (1990)		Natural Gas with Cyclone and Afterburner (≥ 0.3 Second Retention Time at ≥ 1200 °F) (1990)	
Handling Equipment, < 1,590 Lbs/Hr All ²						
Handling Equipment, ≥ 1,590 Lbs/Hr All					Cyclone (1990)	

- 1) Gaseous process emissions from roasting operations which are ducted to a thermal oxidizer or catalytic oxidizer as control technology will be subject to the NO_x requirements of thermal oxidizer or catalytic oxidizer BACT listing in Part D. (2-5-2021)
- 2) At the date of the last revision for this category, there was no Achieved In Practice BACT Determination for this subcategory. Technologically Feasible options listed in historic South Coast AQMD BACT Guidelines for this subcategory require cost effective analyses before they can be listed in these current Guidelines.

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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12-5-2003 Rev. 0

2-1-2019 Rev. 1

Equipment or Process: Composting

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic (Ammonia)
	VOC	NO _x	SO _x	CO	PM ₁₀	
Co-composting ^{a)}	Compliance with Rule 1133.2 ^{b)} (12-5-2003)					Compliance with Rule 1133.2 ^{b)} (12-5-2003)
Greenwaste composting	Compliance with Rule 1133.3 (2-1-2019)					Compliance with Rule 1133.3 (2-1-2019)

a) Co-composting is composting where biosolids and/or manure are mixed with bulking agents to produce compost.

b) Not required for design capacity < 1,000 tons per year.

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Concrete Batch Plant

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NOx	SOx	CO	PM ₁₀	
Central Mixed, < 5 Cubic Yards/Batch					Water Spray (1988)	
Central Mixed, ≥ 5 Cubic Yards/Batch					Baghouse for Cement Handling and Adequate Moisture in Aggregate (1988)	
Transit-Mixed					Baghouse Venting the Cement Weigh Hopper and the Mixer Truck Loading Station; and Adequate Aggregate Moisture (07-11-97)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Concrete Blocks and Forms Manufacturing

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All					Baghouse (1988)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Cotton Gin

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All					Rotary Drum Filter and Cyclone (1988)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

2-1-2019 Rev. 1

Equipment or Process: Crematory

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NOx	SOx	CO	PM ₁₀	
All	Secondary Combustion Chamber, ≥ 1500 °F (1990)	60 ppm Compliance with Rule 1147 (2-1-2019)	Natural Gas (1990)		Natural Gas with Secondary Combustion Chamber, ≥ 1500 °F (1990)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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2-2-2024 Rev. 0

Equipment or Process: Crumb Rubber/Asphalt Oil Blending

<u>Rating/Size</u>	<u>Criteria Pollutants</u>					<u>Inorganic</u>
	<u>VOC</u>	<u>NOx</u>	<u>SOx</u>	<u>CO</u>	<u>PM₁₀</u>	
<u>All</u>	Carbon Adsorber with 90% Control Efficiency (2-2-2024)					

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Degreaser – Other

Rating/Size	Criteria Pollutants					
	VOC/ODC	NO _x	SO _x	CO	PM ₁₀	Inorganic
Batch-Loaded or ConveyORIZED Cold Cleaners	Use of solvents containing 50 grams of VOC or less per liter of material (12-12-97)					
Film Cleaning Machine	Carbon Adsorber (10-20-2000)					
Solvent Spraying ¹⁾ , 1,1,1 Trichloroethane	Carbon Adsorber (1990) and Compliance with 40 CFR 63, Subpart T – National Emission Standards for Halogenated Solvent Cleaning (10-20-2000)					
Solvent Spraying ¹⁾ , Other VOCs	Compliance with Rule 1171 (10-20-2000)					

Note: Use of certain halogenated solvents is also subject to 40 CFR 63, Subpart T – National Emission Standards for Halogenated Solvent Cleaning

1) This subcategory includes solvent spray booths and remote reservoir cleaners.

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Degreaser –Vapor Cleaning, Volatile Organic Compounds

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Batch	<p>Tier 1: Use of an automatically operated airtight or airless cleaning system that emits no more than $[4.3 \times V^{0.6}]$ lb/month of VOCs, where V is the cleaning chamber volume in cubic feet. Use of alternative equipment is allowed provided such equipment is subject to the same emissions limitation (lb/month of VOCs) as calculated above.</p> <p>Tier 2: Use of equipment that does not exceed $[22 \times A]$ lb/month of VOCs, where A is the solvent surface area in square feet, provided it is technically infeasible to use Tier 1 equipment because of part deformation, inherent part pressure, part type or geometry, soil type or amount, cleanliness sensitivity, or other reasons. (4-10-98)</p>					
Conveyorized	Use of a conveyorized vapor degreaser that does not exceed $[17 \times A]$ lb/month of VOCs, where, A is the solvent surface area in square feet (04-10-98)					

Notes:

1. Use of certain halogenated solvents is also subject to 40 CFR 63, Subpart T – National Emission Standards for Halogenated Solvent Cleaning
2. Use of VOCs not subject to the above-described NESHAP is also subject to Rule 1122.
3. Any permit applicant may demonstrate that the Tier 1 BACT may not be technologically feasible for the applicant’s permit unit. For batch-loaded vapor degreasing equipment, South Coast AQMD will consider the following three factors taken together as a whole, as well as any other technical factors presented by the applicant:
 - a) Part Type and Geometry – In that different parts and part geometries lend themselves to different cleaning methods that may be acceptable to achieve proper cleanliness, South Coast AQMD will consider information presented by the applicant regarding the type and geometry of the part(s) proposed to be cleaned in determining what cleaning technologies are available for the part(s) in questions; b) Soil Type and Amount – In that different types and quantities of soils being cleaned from parts lend themselves to different cleaning methods, South Coast AQMD will consider information presented by the applicant regarding the soil type and soil quantity of the part(s) proposed to be cleaned in determining what cleaning technologies are available for the part(s) in question; c) Cleanliness Sensitivity – In that (i) different parts have different levels of sensitivity to cleanliness (e.g., medical and high technology device parts may need to achieve an extremely high level of cleanliness, whereas standard plumbing supplies may tolerate a lower level of cleanliness), and (ii) the integrity of certain parts may be compromised by exposure to the reduced pressure environment of airless cleaning systems; South Coast AQMD will consider information presented by the applicant regarding the cleanliness sensitivity of the part(s) proposed to be cleaned in determining what cleaning technologies are available for the part(s) in question.

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Detergent Manufacturing

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Solids Handling					Cyclone and Baghouse (07-11-97)	
Spray Dryer		Natural Gas with Low-NO _x Burner (1988)	Natural Gas (1988)		Natural Gas with: - Cyclone and Baghouse; or - Cyclone, Scrubber and Electrostatic Precipitator (1988)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Drum Reclamation Furnace

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All	Afterburner (≥ 0.3 Sec. Retention time at ≥ 1400 °F) (1990)	Natural Gas (1990)	Natural Gas (1990)		Natural Gas with Afterburner (> 0.3 Sec. Retention Time at ≥ 1400 °F) and Baghouse (1990)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

7-9-2004 Rev. 1

Equipment or Process: Dry Cleaning

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC/ODC	NO _x	SO _x	CO	PM ₁₀	
Perchloroethylene	Delisted as a VOC. See Rule 1421 – Control of Perchloroethylene Dry Cleaning Operations ¹ (06-13-97)					
Petroleum Solvent ²	Closed Loop, Dry-to-Dry Machine with a Refrigerated Condenser (10-20-2000) or Evaporatively Cooled Condenser (7-9-2004)					

¹ Rule 1421 implements the federal National Emission Standard for Hazardous Air Pollutant for Perchloroethylene Dry Cleaning Facilities (40 Code of Federal Regulations [CFR] 63.320, *et seq*) and the state Airborne Toxic Control Measure (ATCM) for Emissions of Perchloroethylene from Dry Cleaning Operations (17 California of Regulation [CCR] 93109, *et seq*).

²This Equipment may also be subject to AQMD Rule 1102 – Dry Cleaners Using Solvent Other Than Perchloroethylene.

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0
 2-1-2019 Rev 1

Equipment or Process: Dryer – Kiln

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All ¹		Compliance with Rule 1147 (2-1-2019)	Natural Gas (1988)		Natural Gas (1988)	

¹Does not include digester gas or landfill gas fired units.

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10-20-2000 Rev. 0
 2-2-2018 Rev. 1
 2-1-2019 Rev. 2

Equipment or Process: Dryer or Oven

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Carpet Oven		30 ppm Compliance with Rule 1147 (2-1-2019)	Natural Gas (1990)		Natural Gas (1990)	
Rotary, Spray and Flash Dryers ¹⁾		Compliance with Rule 1147 (2-1-2019)	Natural Gas (1990)		Natural Gas with Baghouse (1990)	
Tray, Agitated Pan, and Rotary Vacuum Dryers		Compliance with Rule 1147 (2-1-2019)	Natural Gas (1990)		Natural Gas (1990)	
Tenter Frame Fabric Dryer		30 ppm Compliance with Rule 1147 (2-1-2019)	Natural Gas (10-20-2000)		Natural Gas (10-20-2000)	
Other Dryers and Ovens – Direct and Indirect Fired ^{2, 3}		30 ppmvd corrected to 3% O ₂ (04-10-98)	Natural Gas (10-20-2000)		Natural Gas (10-20-2000)	

1. Dryers for foodstuff, pharmaceuticals, aggregate & chemicals.
2. Does not include food or bakery ovens. See listing for “Food Oven.”
3. Does not include digester gas or landfill gas units.

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Electric Furnace – Pyrolyzing, Carbonizing and Graphitizing

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All	Afterburner (≥ 0.3 Sec. Retention Time at ≥ 1400 °F) (1988)					

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Electrical Wire Reclamation – Insulation Burn-Off Furnace

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NOx	SOx	CO	PM ₁₀	
All	Afterburner (≥ 0.3 Second Retention Time at ≥ 1400 °F); Or Secondary Combustion Chamber (≥ 0.3 Second Retention Time at ≥ 1400 °F) (1988)	Natural Gas (1988)	Natural Gas (1988)		Natural Gas with Baghouse and: - Afterburner (≥ 0.3 Second Retention Time at ≥ 1400 °F) or - Secondary Combustion Chamber (≥ 0.3 Second Retention Time at ≥ 1400 °F) (1988)	

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10-20-2000 Rev. 0

Equipment or Process: Ethylene Oxide Sterilization

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Aeration	Recirculation Vacuum Pump-Seal Fluid with Fluid Reservoir Vented to: Chemical Scrubber; or Afterburner (≥ 0.3 second retention time at ≥ 1400°F); or Catalytic Afterburner (at ≥ 280°F) (07-11-97)					
Quarantine Storage	Unvented Enclosure with Internal Circulation Through Activated Carbon Impregnated with Sulfuric Acid (1989)					

Note: Ethylene Oxide Sterilization may also be Subject to 40 CFR 63, Subpart O – Emission Standards for Ethylene Oxide Sterilization Facilities.

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Expanded Polystyrene Manufacturing Using Blowing Agent

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All	For VOC Emissions: Incineration (≥ 0.3 Sec. Retention Time at ≥ 1400 °F) (1990)					

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Fatty Acid – Fat Hydrolyzing and Fractionation

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All	Condenser or Afterburner (≥ 0.3 Sec. Retention Time at ≥ 1300 °F) (10-20-2000)					

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Fatty Alcohol

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All	Afterburner (≥ 0.3 second retention time at ≥ 1400 °F) (07-11-97)					

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0

2-5-2021 Rev. 2

Equipment or Process: Fermentation, Beer and Wine

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All Closed Systems	Carbon Adsorber (10-20-2000)					
All Open Systems	Scrubber with Approved Liquid Waste Disposal (10-20-2000)					
Wine Fermentation Tanks: Closed-Top ≤ 30,000 gallons capacity of each tank in system (2-5-2021)	Water Scrubber or Chiller Condenser with 67.0% combined capture and control efficiency averaged over length of fermentation season (mass balance basis)					

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10-20-2000 Rev. 0
 2-1-2019 Rev. 1
 2-5-2021 Rev. 2

Equipment or Process: Fish Reduction

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Cooker	Scrubber with Chlorinated Solution (≤ 20 ppmv Cl ⁻ Outlet Conc., ≥ 0.6 Sec. Retention Time and ≤ 200 °F Outlet Temp.) (1988)					
Digestor, Evaporator and Acidulation Tank	Afterburner (≥ 0.3 Sec. Retention Time at ≥ 1200 °F) (1990)				Natural Gas with Afterburner (≥ 0.3 Sec. Retention Time at ≥ 1200 °F) (1990)	
Dryer	Scrubber with Chlorinated Solution (≤ 20 ppmv Cl ⁻ Outlet Conc., ≥ 0.6 Sec. Retention Time and ≤ 200 °F Outlet Temp.) (1990)				Natural Gas and Scrubber with Chlorinated Solution (≤ 20 ppmv Cl ⁻ Outlet Conc., ≥ 0.6 Sec. Retention Time and ≤ 200 °F Outlet Temp.) (1990)	
Meal Handling ¹						
Rendering – Presses, Centrifuges, Separators, Tanks, Etc.	Water Condenser and Vent to Dryer Firebox (1988)					

1) At the date of the last revision for this category, there was no Achieved In Practice BACT Determination for this subcategory. Technologically Feasible options listed in historic South Coast AQMD BACT Guidelines for this subcategory require cost effective analyses before they can be listed in these current Guidelines.

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10-20-2000 Rev. 0

2-5-2021 Rev. 1

Equipment or Process: Flare

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Digester Gas or Landfill Gas from Non-Hazardous Waste Landfill	Ground Level, Shrouded, ≥ 0.6 Sec. Retention Time at ≥ 1400 °F, Auto Combustion Air Control, Automatic Shutoff Gas Valve and Automatic Re-Start System (1988) Compliance with Rule 1118.1 (Landfill gas only) (2-5-2021)	0.06 lbs/MM Btu (1988) Compliance with Rule 1118.1 (2-5-2021)		Ground Level, Shrouded, ≥ 0.6 Sec. Retention Time at ≥ 1400 °F, and Auto Combustion Air Control (1988) Compliance with Rule 1118.1 (Landfill gas only) (2-5-2021)	Knockout Vessel (1988)	
Landfill Gas from Hazardous Waste Landfill	Ground Level, Shrouded, ≥ 0.6 Sec. Retention Time at ≥ 1500 °F, Auto Combustion Air Control, Automatic Shutoff Gas Valve and Automatic Re-Start System (1988) Compliance with Rule 1118.1	0.06 lbs/MM Btu (2020) Compliance with Rule 1118.1 (2-5-2021)		Ground Level, Shrouded, ≥ 0.6 Sec. Retention Time at ≥ 1500 °F, and Auto Combustion Air Control (1988) Compliance with Rule 1118.1 (2-5-2021)	Knockout Vessel (1988)	
Produced Gas (2-5-2021)	Compliance with Rule 1118.1	Compliance with Rule 1118.1		Compliance with Rule 1118.1		
Organic Liquid Storage (2-5-2021)		Compliance with Rule 1118.1		Compliance with Rule 1118.1		
Organic Liquid Loading (2-5-2021)		Compliance with Rule 1118.1		Compliance with Rule 1118.1		
Other Flare Gas (2-5-2021)		Compliance with Rule 1118.1				

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10-20-2000 Rev. 0

Equipment or Process: Flow Coater, Dip Tank and Roller Coater

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
< 36 lbs/day VOC	Compliance with Regulation XI (10-20-2000)					
≥ 36 lbs/day VOC	Coating with Lower VOC Content than Required by Applicable Rules, and Emissions from Coating Area, Flash Off Area, Drying Area, and Oven Vented to Control Device Achieving ≥ 90% Overall Efficiency (1988) Or Super Compliant Materials with ≤ 5% VOC by Weight (10-20-2000)					

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

2-2-2018 Rev. 0

Equipment or Process: Food Oven

Subcategory ¹	Rating/ Size	Criteria Pollutants					Inorganic
		VOC	NO _x	SO _x	CO	PM ₁₀	
Ribbon Burner	> 500°F		60 ppmvd @ 3% O ₂ (2-2-2018)	Natural Gas (2-2-2018)	Compliance with applicable Rules 407 or 1153.1 (2-2-2018)	Natural Gas (2-2-2018)	
	≤ 500°F		30 ppmvd @ 3% O ₂ (2-2-2018)	Same as above	Same as above	Same as above	
Other Direct Fired Burner			30 ppmvd @ 3% O ₂ (2-2-2018)				
Infrared Burner			30 ppmvd @ 3% O ₂ (2-2-2018)				
Add-on Control for Bakery Oven processing yeast leavened products with emissions ≥ 30 lb VOC/day		Catalytic oxidizer with 95% overall control efficiency (mass basis); catalyst inlet temperature ≥ 600°F; ceramic prefilter (2-2-2018)	Compliance with Rule 1147 at the time of applicability (2-2-2018)				

¹Indirect Fired units may be subject to Rules 1146 and 1146.1 and BACT for Process Heater.

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0

Equipment or Process: Foundry Sand Mold – Cold Cure Process

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All			Packed Column Scrubber with pH of Solution Maintained at a Minimum of 8.0 (1988)			

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0

2-1-2019 Rev 1

Equipment or Process: Fryer – Deep Fat

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Integrated Afterburner/Oil Heater < 2 MM Btu/hr	≥ 0.3 Sec. Retention Time at ≥ 1400 °F (2-1-2019)	Natural Gas (1990)	Natural Gas (1990)		≥ 0.3 Sec. Retention Time at ≥ 1400 °F	
Integrated Afterburner/Oil Heater ≥ 2 MM Btu/hr	≥ 0.3 Sec. Retention Time at ≥ 1400 °F (2-1-2019)	Natural Gas (1990)	Natural Gas (1990)		≥ 0.3 Sec. Retention Time at ≥ 1400 °F, and Electrostatic Precipitator or High Efficiency Mist Eliminator (2-1-2019)	
Non-Integrated Direct and In-Direct Oil Heater (Steam, Thermal Fluid Heater and burner exhaust gases)		60 ppm Compliance with Rule 1147 (2-1-2019)				

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0

12-5-2003 Rev. 1

Equipment or Process: Fugitive Emission Sources at Natural Gas Plants and Oil
and Gas Production Fields

Subcategory/Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Compressors, Centrifugal Type	Seal System with a Higher Pressure Barrier Fluid (04-10-98); and Compliance with Rule 1173 (12-5-2003)					
Compressors, Rotary Type	Enclosed Seal System Connected to Closed Vent System (04-10-98); and Compliance with Rule 1173					
Pressure Relief Valves	Connected to Closed Vent System or Equipped with Rupture Disc if Applicable (4-10-98); and Compliance with Rule 1173 (12-5-2003)					
Pumps – In Heavy Liquid Service	Single Mechanical (4-10-1998); and Compliance with Rule 1173 (12-5-2003)					
Pumps – In Light Liquid Service	Sealless Type if Available and Compatible; or Double or Tandem Seals, and Vented to Closed Vent System (4-10-98); and Compliance with Rule 1173 (12-5-2003)					
Sampling Connections	Closed-Purge, Closed-Loop, or Closed-Vent System (4-10-98); and Compliance with Rule 1173 (12-5-2003)					
Valves, Fittings, Diaphragms, Hatches, Sight-Glasses, Open-Ended Pipes and Meters in VOC Service	Compliance with Rule 1173 (12-5-2003)					

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0

12-5-2003 Rev. 1

Equipment or Process: Fugitive Emission Sources at Organic Liquid Bulk
 Loading Facilities

Subcategory/Rating/Size	Criteria Pollutants					
	VOC	NOx	SOx	CO	PM10	Inorganic
Compressors, Centrifugal Type	Seal System with a Higher Pressure Barrier Fluid; < 500 ppmv by USEPA Method 21 with Quarterly I&M Program ¹⁾ (04-10-98)					
Compressors, Rotary Type	Enclosed Seal System Connected to Closed Vent System; < 500 ppmv by USEPA Method 21 with Quarterly I&M Program ¹⁾ (04-10-98)					
Connectors ²⁾ in Gas, Vapor or Light Liquid VOC Service	< 500 ppmv by USEPA Method 21 with Quarterly I&M Program ¹⁾ (04-10-98)					
Open Ended Valves and Pipes	Compliance with Rule 1173 where Applicable (10-20-2000)					
Pressure Relief Valves	Connected to Closed Vent System or Equipped with Rupture Disc if Applicable (4-10-98); and Compliance with AQMD Rule 1173 (10-20-2000)					
Process Valves – Gate, Globe and Ball	Compliance with AQMD Rule 1173, where Applicable (10-20-2000)					
Pumps – In Heavy Liquid Service	Single Mechanical; < 1000 ppmv by USEPA Method 21 with Quarterly I&M (4-10-1998)					
Pumps – In Light Liquid Service	1. Sealless Type if Available and Compatible, or 2. Double or Tandem Seals and Vented to Closed Vent System; < 1000 ppmv by USEPA Method 21 with Approved South Coast AQMD I&M; <1000 ppmv by USEPA Method 21 with Approved South Coast AQMD I&M (4-10-98)					
Sampling Connections	Closed-Purge, Closed-Loop, or Closed-Vent System (4-10-98)					

1) Quarterly I&M shall be consistent with Rule 1173 and other applicable requirements except that leaks between 500 and 1000 ppmv must be repaired within 14 days after detection.

2) Connectors include flanges, screwed or other joined fittings

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0
 12-5-2003 Rev. 1

Equipment or Process: Fugitive Emission Sources, Other Facilities

Subcategory/Rating/Size	Criteria Pollutants					
	VOC	NOx	SOx	CO	PM10	Inorganic
Compressors, Fittings, Open Ended Pipes, Pressure Relief Devices, , Valves, Pumps, Sampling Connections, Diaphragms, Hatches, Sight-Glasses and Meters in VOC Service	Compliance with Rule 1173, where Applicable by Rule (12-5-2003)					

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0

Equipment or Process: Galvanizing Furnace

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Batch Operations		Natural Gas with Low NO _x Burner (10-20-2000)	Natural Gas (1988)		Natural Gas with Baghouse with Lime Coating (1988)	
Continuous Sheet Metal Operations		Natural Gas with Low NO _x Burner (10-20-2000)	Natural Gas (1988)		Natural Gas with Packed Column Scrubber Serving the Caustic, Acid Pickling Tanks and/or Metal Preparation Tanks (1988, 2000)	
Continuous Wire Operations		Natural Gas with Low NO _x Burner (10-20-2000)	Natural Gas (1988)		Natural Gas with Noncombustible Covering on Molten Metal Surface, Baghouse, and Packed Column Scrubber Serving the Metal Preparation Tanks (1988, 2000)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Garnetting Equipment

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All					Baghouse or Rotary Drum Filter (1988)	

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10-20-2000 Rev. 0

12-3-2004 Rev. 1

Equipment or Process: Gas Turbine

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Natural Gas Fired, < 3 MWe		9 ppmvd @ 15% O ₂ (10-20-2000)		10 ppmvd @ 15% O ₂ (10-20-2000)		<u>With Add-On Controls:</u> 9 ppmvd ammonia @ 15% O ₂ (10-20-2000)
Natural Gas Fired, ≥ 3 MWe and < 50 MWe		2.5 ppmvd @ 15% O ₂ x <u>efficiency (%)¹</u> 34% (6-12-98)		10 ppmvd @ 15% O ₂ (6-12-98)		<u>With Add-On Controls:</u> 5.0 ppmvd ammonia @ 15% O ₂ (10-20-2000)
Natural Gas Fired, ≥ 50 MWe	2.0 ppmvd (as methane) @ 15% O ₂ , 1-hour avg. OR 0.0027 lbs/MMBtu (higher heating value) (10-20-2000)	2.5 ppmvd @ 15% O ₂ , 1-hour rolling avg. OR 2.0 ppmvd @ 15% O ₂ , 3-hour rolling avg. x <u>efficiency (%)¹</u> 34% (10-20-2000)		6.0 ppmvd @ 15% O ₂ , 3-hour rolling avg. (10-20-2000)		<u>With Add-On Controls:</u> 5.0 ppmvd ammonia @ 15% O ₂ (10-20-2000)

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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Equipment or Process: Gas Turbine

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NOx	SOx	CO	PM ₁₀	
Emergency		See Clean Fuels Policy in Part C of the BACT Guidelines (10-20-2000)	See Clean Fuels Policy in Part C of the BACT Guidelines (10-20-2000)		See Clean Fuels Policy in Part C of the BACT Guidelines (10-20-2000)	
Landfill or Digester Gas Fired		25 ppmv, dry, corrected to 15 %O ₂ (1990)	Compliance with Rule 431.1 (10-20-2000)	130 ppmv, dry, corrected to 15 %O ₂ (10-20-2000)	Fuel Gas Treatment for Particulate Removal (1990)	

Notes: 1) The turbine efficiency correction for NOx is limited to 1.0 as a minimum. The turbine efficiency is the demonstrated percent efficiency at full load (corrected to the higher heating value of the fuel) without consideration of any downstream heat recovery (12-3-2004).

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10-20-2000 Rev. 0

Equipment or Process: Glass Melting Furnace

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NOx	SOx	CO	PM ₁₀	
Decorator Glass		Natural Gas with Low NOx Burner (10-20-2000); Cullet in Raw Material Charged > 80% (1988)			Baghouse (10-20-2000)	
Flat Glass		Natural Gas with Heating Modifications: <ul style="list-style-type: none"> - Excess Oxygen in Ports < 5% - Cullet in Raw Material Charged > 15% - Hot Spot Temperature < 2,700 °F (1988)	Process Modification: Sulfur Content of Batch Charged < 0.25% by Weight of Total Batch (1988)		Baghouse (10-20-2000)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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2-5-2021 Rev. 0

Equipment or Process: Glass Screen Printing

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO_x	SO_x	CO	PM₁₀	
Flat Glass	Compliance with Rule 1145 or use of Rule 1145 compliant UV/EB or water-based coatings					

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10-20-2000 Rev. 0

Equipment or Process: Incinerator – Hazardous Waste

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All	Automatic Combustion Air Control, ≥ 2 Sec. Retention Time and ≥ 1800 °F (1988)	Natural Gas Supplemental Fuel with Selective Non-catalytic Reduction (1988)	Natural Gas Supplemental Fuel and Spray Dryer with Lime Injection (1988)	Automatic Combustion Air Control, ≥ 2 Sec. Retention Time and ≥ 1800 °F (1988)	0.002 gr/dscf at 12% CO ₂ (1988)	

Note: The equipment may also be subject to 40 CFR 264, Subpart O--Incinerators

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Incinerator – Infectious Waste

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
≤ 300 lbs/hr	Multiple Chamber Starved Air Design (≥ 0.5 Sec. Retention Time at ≥ 1800 °F) (1988)	Natural Gas as Auxiliary Fuel (1988)	Natural Gas as Auxiliary Fuel with Wet Scrubber (1988)	Multiple Chamber Starved Air Design (≥ 0.5 Sec. Retention Time at ≥ 1800 °F) (1988)		
> 300 lbs/hr	Same as Above	Same as Above	Same as Above	Same as Above	0.04 gr/dscf Corrected to 12% CO ₂ , with Enclosed Automatic Feed and Ash Removal System (1988)	

Note: The equipment may also be subject to 40 CFR 60, Subpart Ec--Standards of Performance for Hospital/Medical/Infectious Waste Incinerators for Which Construction Is Commenced After June 20, 1996

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10-20-2000 Rev. 0

7-9-2004 Rev. 1

Equipment or Process: Incinerator – Non-Infectious, Non-Hazardous Waste

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
≤ 300 lbs/hr	Multiple Chamber Starved Air Design (≥ 0.5 Sec. Retention Time at ≥ 1600 °F) (1988)	Natural Gas as Auxiliary Fuel (1988)	Natural Gas as Auxiliary Fuel with Wet Scrubber (1988)	Multiple Chamber Starved Air Design (≥ 0.5 Sec. Retention Time at ≥ 1600 °F) (1988)	Natural Gas as Auxiliary Fuel with Enclosed Automatic Feed and Fly ash Removal System (1988)	
> 300 lbs/hr and < 750 lbs/hr	Same as Above	Same as Above	Same as Above	Same as Above	0.04 gr/dscf Corrected to 12% CO ₂ , with Enclosed Automatic Feed and Ash Removal System (1988)	
≥ 750 lbs/hr	Multiple Chamber Starved Air Design (≥ 0.5 Sec. Retention Time at ≥ 1800 °F) (1988)	Same as Above	Same as Above	Multiple Chamber Starved Air Design (≥ 0.5 Sec. Retention Time at ≥ 1800 °F) (1988)	Same as Above	

Note: The equipment may also be subject to 40 CFR 60, Subpart CCCC--Standards of Performance for New Stationary Sources: Commercial and Industrial Solid Waste Incineration Units.

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10-20-2000 Rev. 0
 6-6-2003 Rev. 1
 7-14-2006 Rev. 2
 12-02-2016 Rev. 3
 2-2-2018 Rev. 4

Equipment or Process: I.C. Engine, Portable ¹

Subcategory	Rating/Size	Criteria Pollutants					
		VOC	NO _x	NO _x + NMHC ²	SO _x	CO	PM
Compression-Ignition ³	50 ≤ HP < 75			<u>Tier 4 Final:</u> 4.7 grams/kW-hr (3.5 grams/bhp-hr) (12-02-2016)	Diesel fuel with a sulfur content no greater than 0.0015% by weight (Rule 431.2). (6-6-2003)	<u>Tier 4 Final:</u> 5.0 grams/kW-hr (3.7 grams/bhp-hr) (12-02-2016)	<u>Tier 4 Final:</u> 0.03 grams/kW-hr (0.02 grams/bhp-hr) and CARB ATCM for portable diesel engines ⁴ (12-02-2016)
	75 ≤ HP < 175		<u>Tier 4 Final:</u> 0.40 grams/kW-hr (0.30 grams/bhp-hr) (2-2-2018)	<u>Tier 4 Final:</u> NMHC only: 0.19 grams/kW-hr (0.14 grams/bhp-hr) (2-2-2018)		<u>Tier 4 Final:</u> 5.0 grams/kW-hr (3.7 grams/bhp-hr) (2-2-2018)	<u>Tier 4 Final:</u> 0.02 grams/kW-hr (0.01 grams/bhp-hr) and CARB ATCM for portable diesel engines ⁴ (2-2-2018)
	175 ≤ HP < 750		<u>Tier 4 Final:</u> 0.40 grams/kW-hr (0.30 grams/bhp-hr) (12-02-2016)	<u>Tier 4 Final:</u> NMHC only: 0.19 grams/kW-hr (0.14 grams/bhp-hr) (12-02-2016)		<u>Tier 4 Final:</u> 3.5 grams/kW-hr (2.6 grams/bhp-hr) (12-02-2016)	<u>Tier 4 Final:</u> 0.02 grams/kW-hr (0.01 grams/bhp-hr) and CARB ATCM for portable diesel engines ⁴ (12-02-2016)

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Subcategory	Rating/Size	Criteria Pollutants					
		VOC	NO _x	NO _x + NMHC ²	SO _x	CO	PM
Compression-Ignition ³	≥750 HP ⁵		<i>Tier 4 Interim: For Generator Sets > 1200 HP: 0.67 grams/kW-hr (0.50 grams/bhp-hr) For All Engines Except "Generator Sets > 1200 HP": 3.5 grams/kW-hr (2.6 grams/bhp-hr) (12-02-2016)</i>	<i>Tier 4 Interim: NMHC only: 0.4 grams/kW-hr (0.30 grams/bhp-hr) (12-02-2016)</i>	<i>Diesel fuel with a sulfur content no greater than 0.0015% by weight (Rule 431.2). (6-6-2003)</i>	<i>Tier 4 Interim: 3.5 grams/kW-hr (2.6 grams/bhp-hr) (12-02-2016)</i>	<i>Tier 4 Interim: 0.10 grams/kW-hr (0.07 grams/bhp-hr) and CARB ATCM for portable diesel engines⁴ (12-02-2016)</i>
Spark Ignition	All	1.5 grams/bhp-hr, or 240 ppmvd as methane @ 15% O ₂ (4-10-1998)	1.5 grams/bhp-hr, or 80 ppmvd @ 15% O ₂ (4-10-1998)			2.0 grams/bhp-hr, or 176 ppmvd @ 15% O ₂ (4-10-1998)	

(Continued on next page)

Notes:

- 1) BACT for "I.C. Engine, Portable" is determined by deemed complete date of permit application not date of manufacture or installation.
- 2) NMHC + NO_x means the sum of non-methane hydrocarbons and oxides of nitrogen emissions, unless specified as "NMHC only", which only includes NMHC emissions.
- 3) The engine must be certified by U.S. EPA or CARB to meet the Tier 4 emission requirements of 40 CFR Part 89 – Control of Emissions from New and In-use Nonroad Compression-Ignition Engines shown in the table– or otherwise demonstrate that it meets the Tier 4 emission limits. If, because of the averaging, banking, and trading program, there is no new engine from any manufacturer that meets the above standards, then the engine must meet the family emission limits established by the manufacturer and approved by U.S. EPA. Based on the model year, the CARB Airborne Toxic Control Measure (ATCM) for Portable Diesel Engines (see www.arb.ca.gov/diesel/peatcm/peatcm.htm) requires in-use portable diesel engines to be

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certified to Tier 1, 2, 3 or 4 by their respective deadlines, all of which have passed. All exceptions allowed in the ATCM are also allowed in this guideline.

- 4) The CARB ATCM also requires in-use portable diesel engines to meet fleet-average PM standards beginning 1/1/2013. The PM limits in the table apply only to filterable PM.
- 5) CARB has extended the Tier 4 Final requirements deadline “until further notice” for Portable, Compression-Ignition Engines for HP \geq 750.

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10-20-2000 Rev. 0
 6-6-2003 Rev. 1
 12-3-2004 Rev. 2
 7-14-2006 Rev. 3
 10-3-2008 Rev. 4
 12-2-2016 Rev. 5
 2-1-2019 Rev. 6
 9-2-2022 Rev. 7

Equipment or Process: I.C. Engine, Stationary, Emergency¹

Subcategory	Rating/Size	Criteria Pollutants					
		NMHC or VOC	NOx	NOx + NMHC ²	SOx	CO	PM
Compression Ignition, Fire Pump ^{3,4}	50 ≤ HP < 100			<u>Tier 3:</u> 4.7 grams/kW-hr (3.5 grams/bhp-hr) (10-03-2008) Compliance with Rule 1470 (12-02-2016)	Diesel fuel with a sulfur content no greater than 0.0015% by weight (Rule 431.2). (6-6-2003)	<u>Tier 3:</u> 5.0 grams/kW-hr (3.7 grams/bhp-hr) (10-03-2008) Compliance with Rule 1470 (12-02-2016)	<u>Tier 3:</u> 0.40 grams/kW-hr (0.30 grams/bhp-hr) (10-03-2008) Compliance with Rule 1470 (12-3-2004) ⁷
	100 ≤ HP < 175			<u>Tier 3:</u> 4.0 grams/kW-hr (3.0 grams/bhp-hr) (10-03-2008) Compliance with Rule 1470 (12-02-2016)		<u>Tier 3:</u> 5.0 grams/kW-hr (3.7 grams/bhp-hr) (10-03-2008) Compliance with Rule 1470 (12-02-2016)	<u>Tier 3:</u> 0.30 grams/kW-hr (0.22 grams/bhp-hr) (10-03-2008) Compliance with Rule 1470 (12-3-2004) ⁷

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Subcategory	Rating/Size	Criteria Pollutants					
		NMHC or VOC	NO _x	NO _x + NMHC ²	SO _x	CO	PM
Compression Ignition, Fire Pump ^{3,4} (continued)	175 ≤ HP < 750			Tier 3: 4.0 grams/kW-hr (3.0 grams/bhp-hr): (10-03-2008) Compliance with Rule 1470 (12-02-2016)	Diesel fuel with a sulfur content no greater than 0.0015% by weight (Rule 431.2). (6-6-2003)	Tier 3: 3.5 grams/kW-hr (2.6 grams/bhp-hr) (10-03-2008) Compliance with Rule 1470 (12-02-2016)	Tier 3: 0.20 grams/kW-hr (0.15 grams/bhp-hr) (10-03-2008) Compliance with Rule 1470 (12-3-2004) ⁷
	≥750 HP			Tier 2: 6.4 grams/kW-hr (4.8 grams/bhp-hr) (10-03-2008) Compliance with Rule 1470 (12-02-2016)		Tier 2: 3.5 grams/kW-hr (2.6 grams/bhp-hr) (10-03-2008) Compliance with Rule 1470 (12-02-2016)	Tier 2: 0.20 grams/kW-hr (0.15 grams/bhp-hr) (10-03-2008) Compliance with Rule 1470 (12-02-2016) ⁷
Compression-Ignition, Other ^{3,4}	50 ≤ HP < 100			Tier 3: 4.7 grams/kW-hr (3.5 grams/bhp-hr) (10-03-2008) Compliance with Rule 1470 (12-02-2016)		Tier 3: 5.0 grams/kW-hr (3.7 grams/bhp-hr) (10-03-2008) Compliance with Rule 1470 (12-02-2016)	Tier 3: 0.20 grams/kW-hr (0.15 grams/bhp-hr) (10-03-2008) Compliance with Rule 1470 (12-3-2004) ⁷
Compression-Ignition, Other ^{3,4} (continued)	100 ≤ HP < 175			Tier 3: 4.0 grams/kW-hr (3.0 grams/bhp-hr) (10-03-2008) Compliance with Rule 1470 (12-02-2016)	Diesel fuel with a sulfur content no greater than 0.0015% by weight (Rule 431.2). (6-6-2003)	Tier 3: 5.0 grams/kW-hr (3.7 grams/bhp-hr) (10-03-2008) Compliance with Rule 1470 (12-02-2016)	Tier 3: 0.20 grams/kW-hr (0.15 grams/bhp-hr) (2-01-2019) Compliance with Rule 1470 (12-3-2004) ⁷

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Subcategory	Rating/Size	Criteria Pollutants					
		NMHC or VOC	NO _x	NO _x + NMHC ²	SO _x	CO	PM
	175 ≤ HP < 300			<u>Tier 3:</u> 4.0 grams/kW-hr (3.0 grams/bhp-hr) (10-03-2008) Compliance with Rule 1470 (12-02-2016)		<u>Tier 3:</u> 3.5 grams/kW-hr (2.6 grams/bhp-hr) (10-03-2008) Compliance with Rule 1470 (12-02-2016)	<u>Tier 3:</u> 0.20 grams/kW-hr (0.15 grams/bhp-hr) (10-03-2008) Compliance with Rule 1470 (12-3-2004) ⁷
	300 ≤ HP < 750			<u>Tier 3:</u> 4.0 grams/kW-hr (3.0 grams/bhp-hr) (7-14-2006) Compliance with Rule 1470 (12-02-2016)		<u>Tier 3:</u> 3.5 grams/kW-hr (2.6 grams/bhp-hr) (7-14-2006) Compliance with Rule 1470 (12-02-2016)	<u>Tier 3:</u> 0.20 grams/kW-hr (0.15 grams/bhp-hr) (7-14-2006) Compliance with Rule 1470 (12-3-2004) ⁷
Compression-Ignition, Other ^{3, 4} (continued)	≥ 750 HP			<u>Tier 2:</u> 6.4 grams/kW-hr (4.8 grams/bhp-hr) (10-03-2008) Compliance with Rule 1470 (12-02-2016)	Diesel fuel with a sulfur content no greater than 0.0015% by weight (Rule 431.2). (6-6-2003)	<u>Tier 2:</u> 3.5 grams/kW-hr (2.6 grams/bhp-hr) (10-03-2008) Compliance with Rule 1470 (12-02-2016)	<u>Tier 2:</u> 0.20 grams/kW-hr (0.15 grams/bhp-hr) (10-03-2008) Compliance with Rule 1470 (12-3-2004) ⁷
Spark Ignition ⁵	< 130 HP	VOC: 1.5 grams/bhp-hr (10-20-2000)	1.5 grams/bhp-hr (10-20-2000)		See Clean Fuels Policy in Part C of the BACT Guidelines (10-20-2000)	2.0 grams/bhp-hr (10-20-2000)	See Clean Fuels Policy in Part C of the BACT Guidelines (10-20-2000)

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

Subcategory	Rating/Size	Criteria Pollutants					
		NMHC or VOC	NO _x	NO _x + NMHC ²	SO _x	CO	PM
	≥ 130 HP	VOC: 1.0 grams/bhp-hr ⁶ (12-02-2016)	1.5 grams/bhp-hr (10-20-2000)		See Clean Fuels Policy in Part C of the BACT Guidelines (10-20-2000)	2.0 grams/bhp-hr (10-20-2000)	See Clean Fuels Policy in Part C of the BACT Guidelines (10-20-2000)

- 1) An emergency engine is an engine which operates as a temporary replacement for primary mechanical or electrical power sources during periods of fuel or energy shortage or while a primary power source is under repair. This includes fire pumps, emergency electrical generation and other emergency uses.
- 2) NMHC + NO_x means the sum of non-methane hydrocarbons and oxides of nitrogen emissions.
- 3) South Coast AQMD restricts operation of emergency compression-ignition engines to 50 hours per year, or less if required by Rule 1470, for maintenance and testing and a maximum of 200 hours per year total operation. For engines used to drive standby generators, operation beyond 50 hours per year for maintenance and testing is allowed only in the event of a loss of grid power or up to 30 minutes prior to a rotating outage provided that the electrical grid operator or electric utility has ordered rotating outages in the control area where the engine is located or has indicated that it expects to issue such an order at a certain time, and the engine is located in a control area that is subject to the rotating outage.
- 4) The engine must be certified by U.S. EPA or CARB to meet the Tier 1, 2 or 3 emission requirements of 40 CFR Part 89 – Control of Emissions from New and In-use Nonroad Compression-Ignition Engines shown in the table– or otherwise demonstrate that it meets the Tier 1, 2 or 3 emission limits. If, because of the averaging, banking, and trading program, there is no new engine from any manufacturer that meets the above standards, then the engine must meet the family emission limits established by the manufacturer and approved by U.S. EPA. The PM limits apply only to filterable PM.
- 5) South Coast AQMD restricts operation of emergency spark-ignition engines to 50 hours per year for maintenance and testing and a maximum of 200 hours per year total operation. Emergency spark-ignition engines may be used in a Demand Response Program, however the engine will require additional evaluation and may be subject to more stringent regulatory requirements. Since some requirements are based upon the California Airborne Toxic Control Measure for Stationary Compression Ignition Engines, applicants are referred to Title 17, Section 93115.3 of the California Code of Regulations for possible exemptions.
- 6) VOC limit is based on the requirement listed in Table 1 of 40 CFR 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.
- 7) BACT PM emission standard requirement for new Stationary Emergency Standby Diesel-Fueled CI Engines located at a sensitive receptor or 50 meters or less from a sensitive receptor. (9-2-2022)

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

12-02-2016 Rev. 0
 2-2-2018 Rev. 1

Equipment or Process: I.C. Engine, Stationary, Non-Emergency, Non-Electrical Generators

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NOx	SOx	CO	PM10	
> 50 bhp	Compliance with Rule 1110.2 (12-02-2016)	Compliance with Rule 1110.2 (12-02-2016)	See Clean Fuels Policy in Part C of the BACT Guidelines (12-02-2016)	Compliance with Rule 1110.2 (12-02-2016)	See Clean Fuels Policy in Part C of the BACT Guidelines (12-02-2016) Compliance with Rule 1470 (12-02-2016)	
Landfill or Digester Gas Fired ¹	Compliance with Rule 1110.2 (2-2-2018)	Compliance with Rule 1110.2 (2-2-2018)	Compliance with Rule 431.1 (12-02-2016)	Compliance with Rule 1110.2 (2-2-2018)		

1) For the adoption of this new listing, the requirements for this subcategory were transferred directly from the existing requirements under “I.C. Engine, Stationary, Non-Emergency.” The requirements are not new, but the date listed was updated to reflect the date of adoption of the new listing.

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

2-2-2018 Rev. 0

9-2-2022 Rev. 1

Equipment or Process: I.C. Engine, Stationary, Non-Emergency, Electrical Generators

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
> 50 bhp	Compliance with Rule 1110.2 (2-2-2018)	Compliance with Rule 1110.2 (2-2-2018)	See Clean Fuels Policy in Part C of the BACT Guidelines (2-2-2018)	Compliance with Rule 1110.2 (2-2-2018)	See Clean Fuels Policy in Part C of the BACT Guidelines (2-2-2018) Compliance with Rule 1470 (2-2-2018)	<u>With Add-On Controls:</u> 10 ppmvd ammonia @ 15% O ₂ (9-2-2022)
Landfill or Digester Gas Fired	Compliance with Rule 1110.2 (2-2-2018)	Compliance with Rule 1110.2 (2-2-2018)	Compliance with Rule 431.1 (2-2-2018)	Compliance with Rule 1110.2 (2-2-2018)		

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Jet Engine Test Facility

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO_x	SO_x	CO	PM₁₀	
Experimental High Altitude Testing					Venturi Scrubber with Water Spray in Exhaust (1988)	
Experimental Sea Level (Low Altitude) Testing ¹						
Performance Testing ¹						

1) At the date of the last revision for this category, there was no Achieved In Practice BACT Determination for this subcategory. Technologically Feasible options listed in historic South Coast AQMD BACT Guidelines for this subcategory require cost effective analyses before they can be listed in these current Guidelines.

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Landfill Gas Gathering System

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All	Compliance with Rule 1150.1 - Control of Gaseous Emissions from Municipal Solid Waste Landfills (10-20-2000)					

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Latex Manufacturing - Reaction

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All	Catalytic Incinerator and Caustic Scrubber (1988)					

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0

2-1-2019 Rev. 1

Equipment or Process: Lead Melting Furnace

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Pot or Crucible, Non-Refining Operations		60 ppm Compliance with Rule 1147 (2-1-2019)	Natural Gas (1990)		Natural Gas and Melt only Sows, Pigs, Ingots or Clean Scrap (1990)	
Pot or Crucible, Refining Operations		60 ppm Compliance with Rule 1147 (2-1-2019)	Natural Gas with Scrubber; or Natural Gas with Sulfur Free Refining Agents (1990)		Natural Gas with Baghouse (1990)	
Reverberatory, Secondary Melting Operations		60 ppm Compliance with Rule 1147 (2-1-2019)	Natural Gas with Scrubber (1990)		Natural Gas with Baghouse (1990)	

Note: Some secondary lead smelting operations must also comply with the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 63, Subpart X.

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0

Equipment or Process: Lead Oxide Manufacturing – Reaction Pot Barton Process

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All		Natural Gas (1988)	Natural Gas (1988)		Natural Gas with Baghouse (1988)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0

12-02-2016 Rev.1

Equipment or Process: Liquid Transfer and Handling

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NOx	SOx	CO	PM ₁₀	
Marine, Loading	For VOC Emissions: Vapor Collection System Vented to Incinerator (1990)					
Tank Truck and Rail Car Bulk Loading, Class A (Rule 462)	Compliance with Rule 462 (0.08 Lbs/1000 Gals) (10-20-2000)					For Ammonia: Bottom Loading with Vapor Collection System Vented to Packed Column Scrubber (10-20-2000)
Tank Truck and Rail Car Bulk Loading, Classes B and C (Rule 462)	Bottom Loading with Vapor Collection System Vented to: - Incinerator; or - Compression/absorption with Tail Gas Vented to Incinerator; or - Refrigeration System; or - Carbon Adsorption system and Compliance with Rule 462 (10-20-2000)					Same as Above
Gasoline Transfer and Dispensing	Compliance with Rule 461 (12-02-2016)					

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Metal Heating Furnace

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All		Natural Gas with Low NO _x Burner ≤ 50 ppmvd at 3% O ₂ , dry. (10-20-2000)	Natural Gas (1990)			Natural Gas (1990)

Note: This category includes metal aging, annealing, forging, heat treating, and homogenizing.

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0

Equipment or Process: Metallizing Spray Gun

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All					Water Wash Spray Booth or Scrubber (1988)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0

Equipment or Process: Mixer, Blender or Mill

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Dry					Baghouse (07-11-97)	
Wet	Carbon Adsorber; or Refrigerated Condenser; or Afterburner (VOC Emissions Only); or Vapor Recovery (07-11-97)				Baghouse if Dry Ingredients are Added (07-11-97)	Packed Column Scrubber (07-11-97)

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Nitric Acid Manufacturing

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All		Catalytic Reduction Furnace (07-11-97)				

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0

Equipment or Process: Non-Metallic Mineral Processing – Except Rock or Aggregate

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All					Baghouse for Enclosed Operations Water Fog Spray for Open Operations (1988)	

- Notes:
1. Non-metallic Minerals are minerals such as rock salt, sodium compounds, pumice, gilsonite, talc and pyrophyllite, boron, barite, fluorspar, feldspar, diatomite, perlite, vermiculite, mica, carbon black, silicon and kyanite.
 2. This category includes conveying, size reduction and classification.

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0

Equipment or Process: Nut Roasting

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Roaster		Natural Gas (1988)			Afterburner (≥ 0.3 second Retention Time at ≥ 1400°F) (10-20-2000)	
Handling Equipment					Baghouse (10-20-2000)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

12-02-2016 Rev. 1

Equipment or Process: Oil and Gas Production

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Combined Tankage	All Tanks Vented to: - Vacuum Gas Gathering System; or - Positive Pressure Gas Gathering System; or - Incinerator or Firebox (1988) Compliance with Rules 1148 and 1148.1 (12-02-2016)					
Wellhead	All Wellheads Vented to: - Vacuum Gas Gathering System; or - Positive Pressure Gas Gathering System; or - Incinerator or Firebox (10-20-2000) Compliance with Rules 1148 and 1148.1 (12-02-2016)					

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0
 2-5-2021 Rev. 1
 9-2-2022 Rev. 2

Equipment or Process: Open Process Tanks: Chemical Milling (Etching) and Plating

Subcategory/ Rating/Size		Criteria Pollutants					Inorganic
		VOC	NOx	SOx	CO	PM ₁₀	
Chemical Milling	Aluminum and Magnesium ¹						
	Nickel Alloys, Stainless Steel and Titanium		Packed Chemical Scrubber (10-20-2000)			High Efficiency Mist Eliminator (10-20-2000)	
Plating	Decorative Chrome					Compliance with Rule 1469 (2-5-2021)	
	Hard Chrome					Compliance with Rule 1469 (2-5-2021)	

1) At the date of the last revision for this category, there was no Achieved In Practice BACT Determination for this subcategory. Technologically Feasible options listed in historic South Coast AQMD BACT Guidelines for this subcategory require cost effective analyses before they can be listed in these current Guidelines.

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0

Equipment or Process: Open Spraying – Spray Gun

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All	Compliance with Regulation XI (10-20-2000)				Compliance with Regulation XI (10-20-2000) ¹	

¹ The open spraying must be conducted in a spray booth where feasible.

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0

Equipment or Process: Perlite Manufacturing System

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All		Natural Gas with Low NO _x Burner (10-20-2000)	Natural Gas (10-20-2000)		Baghouse (1988)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0

7-9-2004 Rev. 1

Equipment or Process: Pharmaceutical Manufacturing

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Operations Involving Solvents	Afterburner (≥0.3 second Retention Time at ≥1400°F), Refrigerated Condenser, or Carbon Adsorber (07-11-97)					
Solids Handling					Baghouse (07-11-97)	
Solids Storage Tanks					Baghouse or Vent Filter (07-11-97)	

Note: This equipment may also be subject to Rule 1103 and 40 CFR 63 Subpart GGG – National Emission Standards Pharmaceuticals Production. (7-9-2004)

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0

Equipment or Process: Phosphoric Acid - Thermal Process

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All					Fiber Mist Filter, Electrostatic Precipitator, or Packed Scrubber with Mist Eliminator (07-11-97)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0

Equipment or Process: Phthalic Anhydride

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All					Afterburner (≥0.3 Second Retention Time at ≥1400°F) or Water Cooled Condenser (07-11-97)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Plasma Arc Metal Cutting Torch

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
> 30 KVA Electrical Input					Water Table and Nozzle Water Shroud; or Electrostatic Precipitator (1988)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

2-5-2021 Rev. 1

Equipment or Process: Polyester Resin Operations

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Fabrication – Hand and Spray Layup	Compliance with Rule 1162 (10-20-2000)				Airless Spray Equipment and Spray Booth with Mesh Type Filter (1988)	
Molding and Casting	Compliance with Rule 1162 and Use of Aqueous Emulsion Cleaner or Acetone for Clean-Up to Maximum Extent Possible (1988/10-20-2000)					
Panel Manufacturing	Curing Oven, Impregnation Tables and Mixing Tanks Vented to an Afterburner (≥ 0.3 Sec. Retention Time at ≥ 1400 °F). Storage and Holding Tanks Vented to a Carbon Adsorber (1988)	Natural Gas Fired Curing Oven, Electrically Heated Cellophane Oven and Laminating Table (1988)	Natural Gas (10-20-2000)		Natural Gas Fired Curing Ovens, Cellophane Ovens Vented to an Electrostatic Precipitator and Panel Cutting Saw Vented to Baghouse (1988)	
Pultrusion	Styrene Suppressed Resin (1988), and Compliance with Rule 1162 (10-20-2000)					

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Polystyrene Extruder

	Criteria Pollutants					
Rating/Size	VOC	NO_x	SO_x	CO	PM₁₀	Inorganic
All					Electrostatic Precipitator or Fiber Mist Filter (07-11-97)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0

Equipment or Process: Polystyrene Manufacturing

Rating/Size	Criteria Pollutants					
	VOC	NO _x	SO _x	CO	PM ₁₀	Inorganic
All	Water Cooled Condenser (07-11-97)					

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

2-5-2021 Rev. 1

Equipment or Process: Powder Coating Booth

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
≤ 37 Lbs/Day Throughput					Pocket or Bag-Type Filters (10-20-2000)	
> 37 Lbs/Day Throughput					1. Baghouse (≥ 99% efficiency); or 2. Cartridge Filters (≥ 99% efficiency); (1988) or 3. HEPA Filters (≥ 99.97% efficiency) (1988/10-20-2000) (2-5-2021)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Precious Metal Reclamation

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NOx	SOx	CO	PM ₁₀	
Incineration		Natural Gas (1988)	Natural Gas (1988)		Natural Gas with Baghouse and: - Afterburner (≥ 0.3 sec. Retention Time at ≥ 1400° F); or -Secondary Combustion Chamber (≥ 0.3 sec. Retention Time at ≥ 1400° F) (1988)	
Chemical Recovery and Chemical Reactions		3-Stage NOx Reduction Scrubber (07-11-97)				

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0
 12-5-2003 Rev. 1
 7-14-2006 Rev. 2
 2-2-2018 Rev. 3
 2-1-2019 Rev. 4
 9-2-2022 Rev. 5

Equipment or Process: Printing (Graphic Arts)

Subcategory	Criteria Pollutants					
	VOC	NO _x	SO _x	CO	PM ₁₀	Inorganic
Flexographic	Inks with ≤ 1.5 Lbs VOC/Gal, Less Water and Less Exempt Compounds (1990); or use of UV/EB or water-based inks/coatings ≤ 180 g VOC/L. Compliance with Rules 1130 and 1171 (2-2-2018)					
Alternatively	For add-on control required by Rule 1130(c)(5) or other South Coast AQMD requirement: EPA M. 204 Permanent Total Enclosure (100% collection) vented to thermal oxidizer with 95% overall control efficiency; Combustion Chamber: Temp ≥ 1500°F ¹ , Retention Time > 0.3 seconds (2-2-2018)	Compliance with BACT requirements for Thermal Oxidizer		Compliance with BACT requirements for Thermal Oxidizer		
Letterpress	Compliance with Rules 1130 and 1171 (12-5-2003)					

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

Subcategory	Criteria Pollutants					
	VOC	NO _x	SO _x	CO	PM ₁₀	Inorganic
Lithographic or Offset, Heatset	Low VOC Fountain Solution (\leq 8% by Vol. VOC); Low VOC (\leq 100 g/l) Blanket and Roller Washes; Oil-Based or UV-Curable Inks; and Compliance with Rules 1130 and 1171 (2-2-2018) Oven Vented to a thermal oxidizer (\geq 0.3 Sec. Retention Time at \geq 1400 °F; 95% Overall Efficiency) (10-20-2000)	Compliance with BACT requirements for Thermal Oxidizer Compliance with BACT requirements for Other Dryers and Ovens (9-2-2022)		Compliance with BACT requirements for Thermal Oxidizer	Venting to a thermal oxidizer (\geq 0.3 sec. Retention Time at \geq 1400 °F) (10-20-2000) (2-1-2019)	
Lithographic or Offset, Non-Heatset	Low VOC Fountain Solution (\leq 8% by Vol. VOC); Low VOC (\leq 100 g/l) Blanket and Roller Washes; Oil-Based or UV-Curable Inks; and Compliance with Rules 1130 and 1171. (2-1-2019)					
Rotogravure or Gravure—Publication and Packaging	Compliance with Rules 1130 and 1171 (10-20-2000)					
Screen Printing and Drying	Compliance with Rules 1130.1 and 1171; or use of Rule 1130.1 and 1171 compliant UV/EB or water-based inks/coatings. (2-2-2018)					

1) or temperature demonstrating equivalent overall control efficiency in a South Coast AQMD-approved source test.

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0
 10-03-2008 Rev. 1
 12-02-2016 Rev. 2
 2-1-2019 Rev. 3

Equipment or Process: Process Heater – Non-Refinery

Subcategory/Rating/ Size	Criteria Pollutants					
	VOC	NO _x	SO _x	CO	PM ₁₀	Inorganic
Natural Gas or Propane Fired, >2 and < 20 MM Btu/hr		Compliance with Rules 1146 or 1146.1 (12-02-2016)	Natural Gas (10-20-2000)	≤50 ppmv for firetube type, ≤ 100 ppmv for watertube type, dry corrected to 3% O ₂ (10-20-2000)	Natural Gas (10-20-2000)	
Natural Gas or Propane Fired, ≥ 20 MM Btu/hr		Compliance with Rules 1146 (2-1-2019)	Natural Gas (10-20-2000)	Same as above. (10-20-2000)	Natural Gas (10-20-2000)	With SCR: ≤ 5 ppmvd NH ₃ , corrected to 3% O ₂ With LTO: ≤ 1 ppmvd ozone, corrected to 3% O ₂ (10-20-2000)

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0
 12-5-2003 Rev. 1

Equipment or Process: Reactor with Atmospheric Vent ^{a)}

Rating/Size	Criteria Pollutants					Inorganic
	VOC/ODC	NO _x	SO _x	CO	PM ₁₀	
All	- Carbon Adsorber; or - Afterburner (VOC Only); or - Refrigerated Condenser; or - Scrubber with Approved Liquid Waste Disposal (VOC only) (1990)					

a) Also see “Resin Manufacturing” and “Surfactant Manufacturing”. (12-5-2003)

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10-20-2000 Rev. 0

Equipment or Process: Rendering

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Processing Equipment ¹⁾					Vent to Afterburner or Boiler Fire Box (≥ 0.3 sec. Retention Time at ≥ 1200 °F) (1988)	
Meal Grinding and Handling System					Enclosed Grinding and Screening Operation with Mechanical Conveyors Transporting Meal (1988)	
Tanks and Miscellaneous Equipment					Maintain Internal Temperature Below 140 °F (1988)	

1) Processing equipment includes crax pressing, filtering, centrifuging, evaporators, cookers, dryers, and grease and blood processing.

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12-5-2003 Rev. 0

Equipment or Process: Resin Manufacturing

Subcategory	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Continuous Polystyrene Process	Compliance with Rule 1141: ≤0.12 Pounds VOC per 1000 Pounds Completed Resin Product from Vacuum Devolatilizer and Styrene Recovery Systems (12-5-2003)					
Liquid-Phase, High-Density Polyethylene Slurry Process	Compliance with Rule 1141: ≥98% Reduction from Reactors, Recycle Treaters, Thinning Tanks, Blending Tanks and Product Finishing Section (12-5-2003)					
Liquid-Phase Polypropylene Process	Compliance with Rule 1141: ≥98% Reduction from Organic Resin Reactors, Slurry Vacuum Filter System, Diluent Recovery Section and Product Finishing Section (12-5-2003)					
Other Resin Manufacturing	Compliance with Rule 1141: ≤0.5 Pounds VOC per 1000 Pounds Completed Resin Product, or ≥95% Reduction from Resin Reactors, Thinning Tanks and Blending Tanks (12-5-2003)					

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Rock – Aggregate Processing

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All					Baghouse Venting Jaw Crushers, Cone Crushers, and Material Transfer Points Adjacent to and after these Items; and Water Sprays at Other Material Transfer Points (1990)	

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10-20-2000 Rev. 0

Equipment or Process: Rocket Engine Test Cell

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All		Chemical Packed Scrubber (1988)			Chemical Packed Scrubber and Water Spray in Exhaust with Steam Ejectors (1988)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Rubber Compounding – Banbury Type Mixer

	Criteria Pollutants					
Rating/Size	VOC	NO_x	SO_x	CO	PM₁₀	Inorganic
All					Baghouse (1988)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Sand Handling System with Shakeout and/or Muller in System

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All					Baghouse (1988)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Sewage Treatment Plants

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All	Carbon Adsorber or Scrubbing System, Covers for Primary Raw Sewage Processing, and Digester Gas Incineration or Recovery (1988)		Ferrous Chloride Injection and Caustic Scrubber for Hydrogen Sulfide Removal (1988)			

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Smokehouse

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All	Afterburner (≥ 0.3 sec. Retention Time at ≥ 1200° F) (1990)	Steam Heated Smokehouse and Electrically Heated Smoke Generator (1990)		Afterburner (≥ 0.3 sec. Retention Time at ≥ 1200° F) (1990)	Afterburner (≥ 0.3 sec. Retention Time at ≥ 1200° F) (1990)	

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2-1-2019 Rev. 0

Equipment or Process: Soil Vapor Extraction – Thermal/Catalytic Oxidation (Natural Gas – burner only)

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO_x	SO_x	CO	PM₁₀	
All		Compliance with Rule 1147.				

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Solder Leveling –Hot Oil or Hot Air

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All					Electrostatic Precipitator (1988)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Solvent Reclamation

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All	Refrigerated or Water Cooled Condenser (07-11-97)					

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0
 2-1-2019 Rev 1
 2-5-2021 Rev. 2

Equipment or Process: Spray Booth

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NOx	SOx	CO	PM ₁₀	
Fully-enclosed, Down-Draft Type, < 667 Lbs/Month of VOC Emissions (2-5-2021)	Compliance with Applicable Regulation XI Rules (10-20-2000)	If booth has a Make-up Air Unit or a Heater; Compliance with Rule 1147 (2-5-2021)			Dry Filters or Waterwash (1990)	
Other Types, < 1170 Lbs/Month of VOC Emissions	Compliance with Applicable Regulation XI Rules (10-20-2000)	If booth has a Make-up Air Unit or a Heater; Compliance with Rule 1147 (2-5-2021)			Same as Above (1990)	
Fully-enclosed, Down-Draft Type, ≥ 22 Lbs/Day of VOC Emissions (2-5-2021)	- Compliance with Applicable Regulation XI Rules, and VOC Control System with ≥ 90% Collection Efficiency and ≥ 95% Destruction Efficiency, or - Use of Super Compliant Materials (<50 grams of VOC per liter of material): or - Use of Low-VOC Materials Resulting in an Equivalent Emission Reduction (10-20-2000)	If booth has a Make-up Air Unit or a Heater; Compliance with Rule 1147 (2-5-2021)			Same as Above (1990)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Other Types, ≥ 1170 Lbs/Month of VOC Emissions	<ul style="list-style-type: none"> - Compliance with Applicable Regulation XI Rules, and VOC Control System with ≥ 90% Collection Efficiency and ≥ 95% Destruction Efficiency, or - Use of Super Compliant Materials (<50 grams of VOC per liter of material): or - Use of Low-VOC Materials Resulting in an Equivalent Emission Reduction (10-20-2000) 	If booth has a Make-up Air Unit or a Heater; Compliance with Rule 1147 (2-5-2021)			Same as Above (1990)	
Enclosed with automated spray nozzles for wood cabinets, < 1170 Lbs/Month of VOC Emissions (2-5-2021)	Compliance with Rule 1136 or use of Rule 1136 compliant UV/EB or water-based coatings.	If booth has a Make-up Air Unit or a Heater; Compliance with Rule 1147				

Note: The sum of all VOC emissions from all spray booths within the same subcategory applied for in the previous two years at the same facility are considered toward the emission threshold.

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Steel Melting Furnace

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO_x	SO_x	CO	PM₁₀	
Electric Arc					Baghouse (1988)	
Induction, ≤ 300 Lb. Capacity					Charge Only Ingots or Clean Returns, or Baghouse (10-20-2000)	
Induction, > 300 Lb. Capacity					Baghouse (07-11-97)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0

Equipment or Process: Storage Tanks - Liquid

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NOx	SOx	CO	PM ₁₀	
Asphalt					Cool Gases to < 120 °F and Vent to a Fiberglass or Steel Wool Filter. (07-11-97)	
External Floating Roof, VP ≤ 11 psia	Category A Tank Seals and Compliance with Rule 463 (10-20-2000)					
Fixed Roof	Vapor Recovery System with an Overall System Efficiency of ≥ 95% (7-11-97)					
Fuming Sulfuric Acid					Scrubber Followed by Fiber Mist Filter; or Water Spray Followed by Fiber Mist Filter (1988)	
Grease or Tallow					Maintain Temperature ≤ 140 °F (1988)	
Internal Floating Roof	Category A Tank Seals and Compliance with Rule 463 (10-20-2000)					
Sulfuric Acid			Caustic Scrubber and Mist Eliminator (1988)			
Underground, > 250 Gallons	≥ 95% Removal Efficiency for VOC (1990)					

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

12-5-2003 Rev. 0

Equipment or Process: Surfactant Manufacturing

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NOx	SOx	CO	PM ₁₀	
All	Compliance with Rule 1141.2 ^{a)} : ≤ 0.5 Pounds per 1000 Pounds of Surfactant Product, or ≥ 95% (Wt.) Reduction From All Surfactant Manufacturing Equipment Vented to Atmosphere (12-5-2003)					

a) Does not apply to soap manufacturing operations or facilities that only blend and package surfactants.

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0

Equipment or Process: Tank – Grease or Tallow Processing

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All					Water Cooled or Atmospheric Condenser and Afterburner (≥ 0.3 sec. Retention Time at ≥ 1200 °F) (1990)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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2-1-2019 Rev. 0
 2-5-2021 Rev. 1

Equipment or Process: Thermal Oxidizer (Afterburner, Regenerative Thermal Oxidizer, and Thermal Recuperative Oxidizer) and Catalytic Oxidizer – Natural Gas Fired**

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Regenerative Thermal Oxidizer (2-5-2021)		30 ppmvd @ 3% O ₂ (Burner emissions only)		400 ppmvd @ 3% O ₂ (Burner emissions only)		
Other Types		30 ppmvd @ 3% O ₂ (Burner emissions only)				

** Does not include tank degassing, soil vapor extraction, and vapor incinerators where vapors are directed into the burner or into a combustion chamber.

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities*

10-20-2000 Rev. 0

Equipment or Process: Tire Buffer

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All					Cyclone and Water Spray at Rasp (07-11-97)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Vegetable Oil Purification

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All	Scrubber and Barometric Condenser (1988)					

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Vinegar Manufacturing

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All	Scrubber with South Coast AQMD- and Sanitation District- Approved Liquid Disposal (1988)					

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0
 12-5-2003 Rev. 1

Equipment or Process: Wastewater System

Subcategory	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Oil/Water Separator	Cover and Vent to Vapor Disposal System (1988); and Compliance with Rule 1176 (12-5-2003)					
Other Equipment	Compliance with Rule 1176 if Applicable by Rule ^{a)} (12-5-2003)					

a) Not required for sanitary sewer system.

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0

Equipment or Process: Wax Burnoff Furnace

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All		Natural Gas with Low NO _x Burner (1988)]	Natural Gas (1988)		Natural Gas with Afterburner or Secondary Combustion Chamber (≥ 0.3 sec. Retention Time at ≥ 1200° F) (1988)	

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**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities***

10-20-2000 Rev. 0

Equipment or Process: Wood Processing Equipment

Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
All					Baghouse (1988)	

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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12-5-2003 Rev. 0

Equipment or Process: Woodworking

Subcategory	Criteria Pollutants					Inorganic
	VOC	NOx	SOx	CO	PM ₁₀	
Pneumatic Conveyance System					Compliance with Rule 1137 ^{a)} : Baghouse with No Visible Emissions Except During Startup and Shutdown (12-5-2003)	

a) Not required if system vents solely to stand-alone control device or into a closed room.

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
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10-20-2000 Rev. 0
 2-1-2019 Rev 1

Equipment or Process: Zinc Melting Furnace

Subcategory/ Rating/Size	Criteria Pollutants					Inorganic
	VOC	NO _x	SO _x	CO	PM ₁₀	
Crucible or Pot		60 ppm Compliance with Rule 1147 (2-1-2019)	Natural Gas (1990)		Natural Gas with Ingot and/or Clean Scrap Charge Only, or Baghouse (1988/2000)	
Reverberatory, Non-Sweating Operations		60 ppm Compliance with Rule 1147 (2-1-2019)	Natural Gas (1990)		Same as Above (10-20-2000)	
Reverberatory, Sweating Operations		60 ppm Compliance with Rule 1147 (2-1-2019)	Natural Gas (1990)		Natural Gas with Baghouse and: Afterburner (≥ 0.3 sec. Retention Time at ≥ 1400° F); or Secondary Combustion (≥ 0.3 sec. Retention Time at ≥ 1400° F); (1990)	
Rotary, Sweating Operations		60 ppm Compliance with Rule 1147 (2-1-2019)	Natural Gas (1990)		Same as Above (1990)	

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**PART E – POLICY AND PROCEDURES
FOR FACILITIES SUBJECT TO
PREVENTION OF SIGNIFICANT
DETERIORATION FOR GREENHOUSE
GASES**

Chapter 1 - GHG BACT

This chapter explains the requirements of greenhouse gases (GHG) BACT regulations according to U.S. EPA, describes the Top-Down Process, shows how to calculate GHG emissions and explains the Prevention of Significant Deterioration (PSD) Applicability for GHGs for new sources as well as modified sources. The guidance in this chapter is applicable to the U.S. EPA requirements in place as of the date of these guidelines, and takes into consideration the U.S. Supreme Court decision in *Utility Air Regulatory Group v. Environmental Protection Agency*, 134 S. Ct. 2427 (2014)¹.

BACKGROUND

U.S. EPA has found that GHG, made of up of six combined compounds, constitute air pollution that endanger public health and welfare. EPA's adopted requirements for GHG under 40 CFR 52.21 in May 2010, which were revised in October 2015, to establish a way to permit GHG emissions under PSD and Title V. Through this rule, permitting focused on the major industrial sources, which emit nearly 70 percent of the greenhouse gas pollution from stationary sources. At this time, smaller businesses and sources are not be subject to these requirements.

The requirements of this rule apply only to GHG as defined by EPA as a total group of six GHG which are: carbon dioxide (CO₂), nitrous oxide (N₂O), methane (CH₄), hydrofluorocarbons (HFC), perfluorocarbons (PFC), and sulfur hexafluoride (SF₆). All other attainment air contaminants, as defined in South Coast AQMD Rule 1702 subdivision (a), shall be regulated for the purpose of PSD.

PERMITTING GUIDANCE FOR GHG

EPA's "PSD and Title V Permitting Guidance for Greenhouse Gases" provides the basic information that permit writers and applicants need to address GHG emissions in permits². Although this guidance was issued prior to the revision of 40 CFR 52.21 in 2015, there are parts still applicable to the current requirements. The applicable parts of the guidance document are summarized in these Guidelines. The guidance:

- applies long-standing PSD and Title V permitting requirements and processes to GHG;
- reiterates that BACT determinations will continue to be a state, and project specific decision;
- does not prescribe GHG BACT for any source type;

¹ The UARG v. EPA decision limited the scope originally envisioned by the Tailoring Rule, and now only "anyway sources" are subject to GHG BACT. On October 3, 2016, EPA proposed revising 40 CFR 52.21 to establish a Significant Emissions Rate for GHGs at the same threshold of 75,000 ton per year CO₂e as Step 1 of the Tailoring Rule for "anyway" sources.

² <https://www.epa.gov/nsr/clean-air-act-permitting-greenhouse-gases>

- emphasizes the importance of BACT options that improve energy efficiency;
- points out that Carbon Capture and Sequestration (CCS) is a promising technology in the early stage of demonstration and commercialization (it should be identified as an available control measure in the first step of BACT, it is currently an expensive technology and unlikely to be selected as BACT in most cases);
- notes that biomass could be considered BACT after taking into account environmental, energy, and economic considerations and state and federal policies that promote biomass for energy-independence and environmental reasons. In its memorandum³ dated November 19, 2014, [EPA U.S. EPA](#) states that it is still assessing and monitoring biogenic feedstocks and will provide further guidance. Further updates can be found at [EPA U.S. EPA's](#) webpage “CO2 Emissions Associated with Biomass Use at Stationary Sources.”
- provides flow charts and examples that illustrate the key points of the traditional five-step process for determining BACT for GHG; and
- identifies technical resources related to GHG emissions and controls.

FEDERAL PSD APPLICABILITY FOR GHG

Beginning January 2, 2011, GHG BACT applies when a new or modified facility is subject to PSD requirements for GHG. The first step for PSD applicability determination for new or modified sources is listed in the Tables 7 and 8 below that address the requirements in 40 CFR 52.21. A second step for PSD applicability is contemporaneous netting. For detailed guidance on this topic, [EPA U.S. EPA's](#) “PSD and Title V Permitting Guidance for Greenhouse Gases” (March 2011) should be referenced, but should be used in accordance with [EPA U.S. EPA's](#) clarifying documents regarding the U.S. Supreme Court decision in *Utility Air Regulatory Group v. Environmental Protection Agency*⁴ and the current requirements under 40 CFR 52.21.

In determining PSD applicability, a differentiation between GHG CO₂e and mass basis must be made. GHG mass basis is simply the sum of all six GHG compound mass emissions. However, to obtain GHG CO₂e, the mass emissions of each individual GHG compound must be multiplied by its 100-year Global Warming Potential (GWP). The individual GHG CO₂e are then summed to obtain the total CO₂e for the source. Current GWP factors should be obtained from [EPA U.S. EPA's](#) website when performing these calculations.

³ EPA Memo: “Addressing Biogenic Carbon Dioxide Emissions from Stationary Sources, (2014 November 9)

⁴ EPA Memo: Next Steps and Preliminary Views on the Application of Clean Air Act Permitting Programs to Greenhouse Gases Following the Supreme Court's Decision, (2014, July 24)

**Table 7
GHG PSD Applicability for New Sources**

PSD applies to GHG if:
<ol style="list-style-type: none"> 1. The source is otherwise subject to PSD for another regulated NSR pollutant, AND 2. The source has a GHG PTE \geq 75,000 tons per year (TPY) CO₂e;

**Table 8
GHG PSD Applicability for Modified Sources**

PSD applies to GHG if:
<ol style="list-style-type: none"> 1. The modification is otherwise subject to PSD for another regulated NSR pollutant, AND 2. The modification results in a GHG emissions increase and net emissions increase: <ol style="list-style-type: none"> a. \geq 75,000 TPY CO₂e, AND b. $>$ zero TPY mass basis

Contemporaneous Netting

Contemporaneous netting is the process of considering all of the creditable emission increases and decreases that have occurred during the period beginning five years before the proposed construction of the modification through the date that the emission increase from the modification occurs. When calculating the net emissions increase in Table 8 above for PSD applicability, it must include all emission increases and decreases during this period.

SOUTH COAST AQMD PSD APPLICABILITY FOR GHG

South Coast AQMD adopted Rule 1714 in 2010 to implement the PSD GHG requirements set forth by 40 CFR 52.21. South Coast AQMD Rule 1714 incorporates the provisions of 40 CFR 52.21 by reference, excluding the sections listed under South Coast AQMD Rule 1714 (c)(1). South Coast AQMD PSD applicability should be determined following the applicable sections of the Code of Federal Regulation identified in the rule.

TOP-DOWN BACT PROCESS

EPA.S. EPA recommends that permitting authorities continue to use the EPA.S. EPA’s five-step “Top-Down” BACT process to determine BACT for

GHG (U.S. EPA, 2011)⁵. While this section summarizes the steps in the process, further details for each of the steps can be referenced in EPA U.S. EPA's guidance document.

BACT Step 1 – Identify All Available Control Options

The first step in the top-down BACT process is to identify all “available” control options. Available control options are those air pollution control technologies or techniques (including lower-emitting processes and practices) that have the potential for practical application to the emissions unit and the regulated pollutant under evaluation.

Permit applicants and permitting authorities should identify all “available” GHG control options that have the potential for practical application to the source under consideration.

The application of BACT to GHG does not affect the discretion of a permitting authority to exclude options that would fundamentally redefine a proposed source. GHG control technologies are likely to vary based on the type of facility, processes involved, and GHG being addressed. EPA U.S. EPA has emphasized the importance of energy efficiency improvements.

For the purposes of a BACT analysis for GHG, EPA U.S. EPA classifies CCS as an add-on pollution control technology that is “available” for large CO₂-emitting facilities including fossil fuel-fired power plants and industrial facilities with high-purity CO₂ streams (e.g., hydrogen production, ammonia production, natural gas processing, ethanol production, ethylene oxide production, cement production, and iron and steel manufacturing).

BACT Step 2 – Eliminate Technically Infeasible Options

Under the second step of the top-down BACT analysis, a potentially applicable control technique listed in Step 1 may be eliminated from further consideration if it is not technically feasible for the specific source under review. EPA U.S. EPA generally considers a technology to be technically feasible if it has been successfully operated on the same type of source under review or is available and applicable to the source under review.

Assuming CCS has been included in Step 1 of the top-down BACT process for such sources, it now must be evaluated for technical feasibility in Step 2. CCS is composed of three main components: CO₂ capture and/or compression, transport, and storage. CCS may be eliminated from a BACT analysis in Step 2 if it can be shown that there are significant differences pertinent to the successful operation for any of these three main components from what has already been applied to a differing source type. For example, the temperature, pressure, pollutant concentration, or volume of the gas stream to be controlled, may differ so significantly from previous applications that it is uncertain the control device will work in the situation currently undergoing review. CCS may be eliminated from a BACT analysis in Step 2 if the three components working together are deemed technically infeasible for the proposed source, taking into account the integration of the CCS components with the base facility and site-specific considerations (e.g., space for CO₂ capture equipment at an existing facility,

⁵ U.S. EPA (2011). PSD and Title V Permitting Guidance for Greenhouse Gases

right-of-ways to build a pipeline or access to an existing pipeline, access to suitable geologic reservoirs for sequestration, or other storage options).

BACT Step 3 – Ranking of Controls

After the list of all available controls is winnowed down to a list of the technically feasible control technologies in Step 2, Step 3 of the top-down BACT process calls for the remaining control technologies to be listed in order of overall control effectiveness for the regulated NSR pollutant under review. The most effective control alternative (*i.e.*, the option that achieves the lowest emissions level) should be listed at the top and the remaining technologies ranked in descending order of control effectiveness. The ranking of control options in Step 3 determines where to start the top-down BACT selection process in Step 4.

The options considered in a BACT analysis for GHG emissions will likely include, but not necessarily be limited to, control options that result in energy efficiency measures to achieve the lowest possible emission level. Where plant-wide measures to reduce emissions are being considered as GHG control techniques, the concept of overall control effectiveness will need to be refined to ensure the suite of measures with the lowest net emissions from the facility is the top-ranked measure. Ranking control options based on their net output-based emissions ensures that the thermal efficiency of the control option, as well as the power demand of that control measure, is fully considered when comparing options in Step 3 of the BACT analysis. Finally, to best reflect the impact on the environment, the ranking of control options should be based on the total CO₂e rather than total mass or, mass for the individual GHG.

BACT Step 4 – Economic, Energy, and Environmental Impacts

Under Step 4 of the top-down BACT analysis, permitting authorities must consider the economic, energy, and environmental impacts arising from each option remaining under consideration. Accordingly, after all available and technically feasible control options have been ranked in terms of control effectiveness (BACT Step 3), the permitting authority should consider any specific energy, environmental, and economic impacts identified with those technologies to either confirm that the top control alternative is appropriate or determine it to be inappropriate.

There are compelling public health and welfare reasons for BACT to require all GHG reductions that are achievable, considering economic impacts and the other listed statutory factors. As a key step in the process of making GHG a regulated pollutant, EPA.S. EPA has considered scientific literature on impacts of GHG emissions and has made a final determination that emissions of six GHG endanger both the public health and the public welfare of current and future generations. Potential impacts that may be considered in this step based on the EPA.S. EPA's January 2010 Endangerment Finding⁶ are detailed in EPA.S. EPA's guidance document.

When conducting a BACT analysis for GHG, the environmental impact analysis should continue to concentrate on impacts other than the direct impacts due to emissions of the regulated pollutant in question. Where GHG control strategies affect emissions of other regulated pollutants, applicants and permitting authorities should consider the potential trade-offs of selecting particular GHG control strategies.

BACT Step 5 – Selecting BACT

In Step 5 of the BACT determination process, the most effective control option not eliminated in Step 4 should be selected as BACT for the pollutant and emissions unit under review and included in the permit. For energy-producing sources, one way to incorporate the energy efficiency of a process unit into the BACT analysis is to compare control effectiveness in BACT Step 3 based on output-based emissions of each of the control options. Establishing an output-based BACT emissions limit, or a combination of output- and input-based limits, wherever feasible and appropriate to ensure that BACT is complied with at all levels of operation should be considered.

GHG CONTROL MEASURES WHITE PAPERS

EPA.S. EPA has a series of technical “white papers” that summarize readily available information on control techniques and measures to reduce GHG emissions from specific industrial sectors. These papers provide basic technical information which may be useful in a BACT analysis, but they do not define BACT for each sector. The industrial sectors covered include:

- Electric Generating Units (PDF) (48pp, 805k)
EPA.S. EPA Contact: Christian Fellner (919-541-4003 or fellner.christian@epa.gov)
- Large Industrial/Commercial/Institutional Boilers (PDF) (39pp, 337k)
EPA.S. EPA Contact: Jim Eddinger (919-541-5426 or eddinger.jim@epa.gov)
- Pulp and Paper (PDF) (62pp, 421k)
EPA.S. EPA Contact: Bill Schrock (919-541-5032 or schrock.bill@epa.gov)
- Cement (PDF) (48pp, 220k)
EPA.S. EPA Contact: Keith Barnett (919-541-5605 or barnett.keith@epa.gov)
- Iron and Steel Industry (PDF) (78pp, 620k)
EPA.S. EPA Contact: Donna Lee Jones (919-541-5251 or jones.donnalee@epa.gov)
- Refineries (PDF) (42pp, 707k)
EPA.S. EPA Contact: Brenda Shine (919-541-3608 or shine.brenda@epa.gov)
- Nitric Acid Plants (PDF) (31pp, 544k)
EPA.S. EPA Contact: Nathan Topham (919-541-0483 or topham.nathan@epa.gov)

⁶ <https://www3.epa.gov/climatechange/endangerment/>

- Landfills (PDF) (28pp, 250k)
EPA U.S. EPA Contact: Hillary Ward (919-541-3154 or ward.hillary@epa.gov)

ATTACHMENT H

Crumb Rubber/Asphalt Blending Cost Effectiveness Analysis

Control Technology: Carbon Adsorber (CA) Unit

Operation Schedule: 10 hr/day 261 days/yr
 CA Unit 20 years
 Interest rate: 4 %

Capital Cost

Equipment (Carbon Adsorber Unit)	\$ 54,989
<u>Direct & Indirect Installation</u>	\$ 71,655
Total Capital	<u>\$ 126,644</u>

Operating Cost

	0.0
<u>Direct & Indirect</u>	\$ 44,038
Total Average Annual	<u>\$ 44,038</u>

PVF	13.59
Present Value of Capital Costs	\$ 126,644
Present Value of Annual Costs (20 years @ 4%)	\$ 598,491
Total 20-Year Capital Cost	<u>\$ 725,135</u>

Uncontrolled VOC (Inlet) Emissions, R1 (lb/day):	9.70
VOC Emissions reduction with 90% efficiency (lbs/day)	8.7
VOC Emissions reduction (lbs/year)	2275.9
VOC Emissions reduction (tons/year)	1.14
VOC Emissions reduction (tons/20-year life)	22.76
Cost per ton of VOC reduced	<u>\$ 31,861</u>

MSBACT maximum cost effectiveness VOC (\$/ton)	\$ 102,682	INCREMENTAL 2nd Qtr 2021	COST EFFECTIVE
	\$ 34,227	AVERAGE 2nd Qtr 2021	COST EFFECTIVE

Notes:

- The carbon adsorber unit is equipped with two carbon canisters with minimum overall control efficiency of 90%.
- Equipment life for carbon adsorbers assumed 20 years based on the EPA report:
https://www.epa.gov/sites/default/files/2018-10/documents/final_carbonadsorberschapter_7thedition.pdf
- Maximum allowed cost effectiveness was based on VOC Average/Incremental value in Table 5, Part C of the 2021 BACT Guidelines.

ATTACHMENT I

Comments and Responses to Proposed Amendments to BACT Guidelines

Public meetings were held on February 23, 2023 and July 25, 2023 and with the BACT SRC to present and discuss the proposed amendments to the BACT Guidelines. The following written comments, questions, and staff responses are from letters received after the first meeting as well as during the 30-day comment period starting July 25, 2023.

- A. Comment Letter A – Ms. Patty Senecal, Western States Petroleum Association (WSPA)
- B. Comment Letter B – Ms. Rita M. Loof, RADTECH – The Association For UV & EB Technology/ BACT SRC member
- C. Comment Letter C – Ms. Ramine Cromartie, Western States Petroleum Association (WSPA)/ BACT SRC member



Comment Letter A (WSPA)

Patty Senecal

Senior Director, Southern California Region

March 9, 2023

Bahareh Farahani
Program Supervisor
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Via e-mail at: bfarahani@aqmd.gov

Re: SCAQMD Proposed Updates to Best Available Control Technology Guidelines

Dear Ms. Farahani,

Western States Petroleum Association (WSPA) appreciates the opportunity to participate in the South Coast Air Quality Management District (SCAQMD or District) Best Available Control Technology Scientific Review Committee (BACT SRC) meetings. WSPA is a non-profit trade association representing companies that explore for, produce, refine, transport, and market petroleum, petroleum products, natural gas, renewable fuels, and other energy supplies in five western states including California. WSPA has been an active participant in air quality planning issues for over 30 years. WSPA-member companies operate petroleum refineries and other facilities in the South Coast Air Basin that will be impacted by SCAQMD's proposed updates to the BACT Guidelines.

SCAQMD presented the proposed updates to BACT Guidelines during the BACT Scientific Review Committee Meeting held on February 23, 2023. WSPA offers the following comments.

1. The BACT guideline for fugitive emission sources at petroleum refineries, as presented, does not reflect the complexity of the requirements that SCAQMD is trying to memorialize in the guideline.

In the BACT SRC meeting, SCAQMD presented proposed Lowest Achievable Emission Rate (LAER)/BACT limits for fugitive emission sources at petroleum refineries. The information presented included a proposed LAER/BACT limit of 200 ppm with repairs required within 14 days of detection of a leak between 200 – 1000 ppm.¹ The information presented appears to be an oversimplification of the requirements under recent BACT determinations, which may include some or all of the following requirements:

- Fugitive emissions must be recalculated based on equipment installed and removed from service
- New valves should be bellows seal valves
- New valves should be leakless type
- All sampling connections must be in closed-purge, closed-loop, or closed-vent
- New components must be expected quarterly or monthly, depending on component type

¹ SCAQMD BACT Scientific Review Committee meeting presentation. Available at: http://www.aqmd.gov/docs/default-source/bact/2-23-23-bact-guidelines-proposed-updates/proposed-updates-to-bact-guidelines_src_february23_2023_final.pdf.

- The operator must keep records of inspections, repairs, and re-inspections

SCAQMD should ensure that the proposed BACT guidelines better align with actual BACT determinations found in recent permit actions. SCAQMD should also ensure that existing control technology guidelines for valves and connectors are followed. Additionally, leaks above 500 ppm should align with current Rule 1173 repair requirements.

2. SCAQMD is proposing a LAER/BACT limit of 200 ppm VOC for fugitive emission sources at petroleum refineries.²

At the BACT SRC meeting held on February 23rd, District staff stated that this proposed standard would only apply to valves and connectors. WSPA requests written confirmation of this scope.

3. SCAQMD is proposing that fugitive emission leaks of petroleum refiner valves and connectors be repaired within 14 days of detection.³ It would be a challenge to meet the proposed repair timeline, particularly on critical components such as control valves. WSPA recommends that control valves should be categorically exempt from the 200 ppm VOC limit.

SCAQMD is proposing as BACT that a leak greater than 200 ppm but less than 1,000 ppm measured as methane using EPA Method 21 be repaired within 14 days of detection. Certain components, such as control valves, are considered critical to the operation of a unit. In order to repair control valves, a facility must shut down the unit, repair the control valve, and start up the unit again. Startup and shutdown emissions are typically more than normal operating emissions. WSPA therefore recommends a categorical exemption for control valves from the 200 ppm limit.

4. If a categorical exemption from the 200 ppm limit is not possible for such components, WSPA recommends incorporating language similar to the San Joaquin Valley Air Pollution Control District (SJVAPCD) Rule 4409 to address the difficulty in repair of critical components.

Repair of critical components at petroleum refineries would be a challenge on the proposed timeline. WSPA recommends that SCAQMD consider incorporating language similar to the SJVAPCD Rule 4409 to address repairs on critical components as follows:⁴

If the leaking component is an essential component or a critical component and which cannot be immediately shut down for repairs, the operator shall:

If the leak has been minimized to less than 500 ppm, but the leak still exceeds 200 ppm, the essential component or critical component shall be repaired or replaced to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier.”

² Ibid.

³ Ibid.

⁴ SJVAPCD Rule 4409. Available at: <https://www.valleyair.org/rules/curnrules/r4409.pdf>.

5. SCAQMD is proposing LAER limits for NO_x, CO, and SO_x for a Sulfur Recovery (Claus) Unit.⁵ Averaging times for the proposed limits were not presented during the BACT SRC meeting. WSPA is affirming the Staff statement made during the BACT SRC meeting that averaging times will be included in the proposed BACT guideline and that the achieved-in-practice averaging times are 24 hours for NO_x and CO, and 72 hours for SO_x. WSPA also requests clarification on the configuration of the Sulfur Recovery Train that these limits apply to, and whether the limits only apply to the unit when it is on standby and fired with natural gas, and not apply to refinery gas fired units or when there is waste gas, acid gas, or process gas routed to the units.
6. SCAQMD is proposing LAER limits for NO_x and CO for natural gas or propane-fired boilers with a heat input rating >20 MMBtu/hr.⁶ WSPA recommends that SCAQMD include a statement in the proposed BACT guideline that clearly denotes that the guideline does not apply to units fired on refinery fuel gas, waste gas, field gas, process off-gas, or a combination of these fuels. WSPA also requests written confirmation of the upper bound MMBtu/hr heat input rating for these proposed limits.

SCAQMD is proposing LAER limits for NO_x and CO for natural gas or propane fired boilers with a heat input rating >20 MMBtu/hr. SCAQMD is basing this determination on a SJVAPCD BACT/LAER determination.⁷ The referenced SJVAPCD BACT/LAER determination clearly states:

This guideline is applicable to units fired solely on natural gas from a PUC or FERC regulated source or propane/LPG.

WSPA recommends that the proposed BACT guideline for boilers with a heat input rating >20 MMBtu/hr include a clear statement as follows:

This guideline is applicable to units fired solely on natural gas from a PUC or FERC regulated source or propane/LPG. It does not apply to units fired on refinery fuel gas, waste gas, field gas, process off-gas, or a combination of these fuels.

WSPA appreciates the opportunity to provide these comments related to the proposed updates to the BACT Guidelines. We look forward to continued discussion of this important rulemaking. If you have any questions, please contact me at (310) 808-2146 or via e-mail at rcromartie@wspa.org.

Sincerely,



⁵ SCAQMD BACT Scientific Review Committee meeting presentation. Available at: http://www.aqmd.gov/docs/default-source/bact/2-23-23-bact-guidelines-proposed-updates/proposed-updates-to-bact-guidelines_src_february23_2023_final.pdf.

⁶ Ibid.

⁷ SJVAPCD BACT Guideline 1.1.2. Available at: <https://www.valleyair.org/busind/pto/bact/chapter1.pdf>.

March 9, 2022
Page 4

Cc: Jason Aspell, SCAQMD
Bhaskar Chandan, SCAQMD
Bettina Burleigh Sanchez, SCAQMD



Response Letter A (to WSPA)
South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

November 16, 2023

Patty Senecal
Western States Petroleum Association
970 West 190th Street, Suite 304
Torrance, California 90502

Re: South Coast AQMD Proposed Updates to Best Available Control Technology (BACT) Guidelines

Dear Ms. Senecal:

Thank you for your letter dated March 9, 2023, regarding the proposed updates to South Coast AQMD's BACT Guidelines. We appreciate your participation at the February 23, 2023 Scientific Review Committee (SRC) meeting, which was the first meeting for this new round of BACT Guidelines updates.

Staff reviewed your comment letter and provided responses below to address your concerns.

Fugitive Emission Sources at Petroleum Refineries:

Comment #1: The BACT guideline for fugitive emission sources at petroleum refineries, as presented, does not reflect the complexity of the requirements that South Coast AQMD is trying to memorialize in the BACT Guidelines.

Response #1: The purpose of the first BACT SRC meeting was simply to solicit stakeholders' input on technical details and environmental impacts in order to include this determination in the BACT guidelines. Staff studied the proposed BACT determination and comments received at the first SRC meeting and presented those findings and further details on the proposed BACT determinations at the second BACT SRC meeting held on July 25, 2023.

The proposed BACT/LAER determination for fugitive emissions sources at petroleum refineries presented at the first SRC meeting is an update to the current BACT that is based on the letter dated August 6, 1993, which has been sent to WSPA (attached). The proposed BACT/LAER determination would only change the maximum fugitive leak from 500 ppm

Total Organic Compounds (TOC) to 200 ppm TOC (TOC as defined in Rule 1173 (c)(31)). All aspects of Rule 1173 and the BACT requirements under the letter dated August 6, 1993, would remain in effect except the maintenance requirements would be triggered at 200 ppm instead of 500 ppm. To ensure that the proposed BACT Guidelines align with actual BACT determination and achieved in practice case, staff listed additional details and requirements of the existing permit, including the permit conditions, in Sections (4), (5) and (6) of the Draft BACT/LAER form, which is attached to this letter. The permit conditions listed in the above sections are also attached for your reference. Additional details were presented at the second BACT SRC meeting on July 25, 2023. These BACT determination forms will be included in Part B of the BACT Guidelines.

Part A of the BACT Guidelines, Chapter 1, discusses the Pollution Prevention Act of 1990 (42 U.S.C. 13101-1309) and how BACT must consider that “pollution prevention may include improvements in housekeeping, maintenance or inventory control, that reduce the amount of air contaminants entering any waste stream or otherwise released into the environment, including fugitive emissions.” Lowering the leak action trigger threshold is a more stringent emission limitation subject to LAER requirements. The proposed BACT/LAER for fugitive components has already been permitted at refineries and in operation for over 10 years and is therefore now considered achieved in practice (AIP).

Comment #2: Define the scope for which components South Coast AQMD is proposing a BACT/LAER limit of 200 ppm VOC for fugitive emission sources at petroleum refineries.

Response #2: The proposed BACT/LAER determination applies to fugitive leaks from components in VOC service (greater than 10% by weight) except for pumps, compressors, and drains. This is consistent with the definitions in Rule 1173. The same requirements and exemptions in Rule 1173 and BACT requirements in the letter dated August 6, 1993, will continue to apply.

Please refer to Rule 1173 (c)(4) for definition of components:

<http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1173.pdf?sfvrsn=4>

Comment #3: Concern that the 14 days allowed to repair fugitive emission leaks from “critical components” is challenging and recommendation that control valves be exempt from the 200 ppm VOC limit.

Response #3: As noted above, this BACT determination is based on an AIP case at a refinery. Requirements and time period to repair leaks found by facility operators that are greater than 200 ppm are included in permit conditions S4.2 and S31.3 (attached). These conditions allow the operator to repair the leak greater than 200 ppm, but no more than 500 ppm, within 14 days of detection without a need to submit a request for a 7-day extension period that is required under Rule 1173. These permit conditions do not have any allowance

for “critical components” or “control valves” and therefore this listing (which is based on the AIP case) does not make any categorical exemptions for “critical components” or “control valves.”

Please note that for leaks greater than 500 ppm, but no more than 10,000 ppm, Rule 1173(g)(1) requires the operator to repair, replace or remove a leaking component in light liquid/gas/vapor within 7 days. Per Rule 1173, for each calendar quarter, the operator may extend the repair period to total of 14 days for a total number of leaking components, not to exceed 0.05 percent of the number of components inspected during the previous quarter, by type, rounded upward to the nearest integer where required. Per Rule 1173(i)(1), upon request by the Executive Officer, the operator shall include in quarterly/annual inspection reports the reason for extending the repair period for any component, as allowed in paragraph (g)(1). There is no additional allowance for “critical components” in the current version of Rule 1173. The proposed LAER requires that the maximum fugitive leak be lowered from 500 ppm to 200 ppm for light liquid/gas/vapor components. All other requirements under Rule 1173 will continue to apply.

Comment #4: Recommendation that a leaking “essential component or a critical component which cannot be immediately shut down for repairs” for a leak greater than 200 ppm but less than 500 ppm be allowed to be repaired at the next process unit turnaround.

Response #4: This BACT determination is based on an AIP case which does not have any allowance for the critical components. Staff is proposing to add this AIP case listing to the BACT Guidelines with all the requirements that were imposed under the permit. All existing Rule 1173 exemptions remain in place including exemptions for components which present a safety hazard for inspection. As noted above, there is no allowance for “critical components” in current Rule 1173, and no allowance was provided in the permit for leaks between 200 ppm to 500 ppm in the AIP case that this LAER is based on.

Sulfur Recovery Unit:

Comment #5: Concerns about NO_x, CO, and SO_x limits for a Sulfur Recovery Unit. Request clarification of averaging times, configuration, and when limits apply.

Response #5: The following details are included on the proposed BACT/LAER determination forms, which is attached to this correspondence. The averaging time for NO_x and CO is 24 hours, and for SO_x is 72 hours. The acid gas feeds to the sulfur recovery unit (SRU) to recover elemental sulfur. Sulfur not recovered in the Claus unit (front portion of SRU) is processed in an amine-based tail gas treatment unit (rear portion of SRU). The tail gas treatment unit (TGTU) is vented to a tail gas incinerator, followed by a caustic scrubber for removal of remaining H₂S and SO_x, respectively.

The emission limits apply during normal operation. Permit conditions A99.17 and A99.18 have provisions for NOx and CO BACT limits during start-up and shutdown. SOx BACT limit does not need an equivalent allowance because sour gas/waste gas is not being routed to the SRU/TGTU during these periods. The tail gas incinerator utilizes natural gas as the primary fuel to combust the tail gas from the TGTU to reduce the tail gas H₂S concentration below 2.5 ppmvd (averaged over 24 hours, 0% O₂). Incinerator is equipped with ultra-low NOx burner and emission limits are based on the lower heating value (LHV) of natural gas.

Boiler, Natural Gas or Propane Fired > 20 MMBTU/HR:

Comment #6: Recommendation to clarify that the LAER limits for NOx and CO are for natural gas or propane-fired boilers with heat input rating >20 MMBtu/hr and be specific as to the fuel types not included, along with the upper bound of heat input rating for the proposed limits.

Response #6: This determination is based on SJVAPCD permit and BACT Guidelines which includes boilers that are fired on natural gas or propane with a rated heat input capacity greater than 20 million Btu per hour and does not include an upper bound for the heat input of the boiler. The BACT/LAER Determination form (attached) includes the details of the applicable fuels and the firing rates. The fuel used is clearly identified in Section L of the BACT/LAER Determination form: "The unit shall only be fired on PUC-quality natural gas."

Please note that LAER is determined on a case-by-case basis and the information in the BACT/LAER form enables permit applicants to assess the applicability of each LAER/BACT determination to their particular equipment.

Staff appreciate your significant time and consideration in submitting comments to our proposed BACT/LAER determinations for Fugitive Emission Sources at Petroleum Refineries, Sulfur Recovery (Claus) Unit, and Boiler, Natural Gas or Propane Fired. The SRC's efforts are vital to ensure BACT/LAER listings receive a robust analysis. Should you have further questions or comments please contact Bettina Burleigh Sanchez at 909-396-3245, Bahareh Farahani at 909-396-2353 or me at 909-396-3902 or bchandan@aqmd.gov

Sincerely,



Bhaskar Chandan, P.E., QEP
Senior Air Quality Engineering Manager
Refinery Permitting and BACT Team

Attachments:

Fugitive Emission Sources at Petroleum Refineries – Draft BACT/LAER Determination Form
Fugitive Emission Sources at Petroleum Refineries – Permit Conditions
South Coast AQMD letter dated August 6, 1993
Sulfur Recovery Unit – Draft BACT/LAER Determination Form
Boiler, Natural Gas or Propane Fired > 20 MMBTU/HR – Draft BACT/LAER Determination Form

Cc: Ramine Cromartie, Western States Petroleum Association (rcromartie@wspace.org)
Jason Aspell, Deputy Executive Officer, Engineering & Permitting (jaspell@aqmd.gov)
Jillian Wong, Assistant Deputy Executive Officer, Engineering & Permitting
(jwong1@aqmd.gov)
Bahareh Farahani, Program Supervisor, BACT Team (bfarahani@aqmd.gov)
Bettina Burleigh Sanchez, Senior Air Quality Engineer (bburleigh@aqmd.gov)

Comment Letter B (RADTECH)



March 9, 2023

Bahareh Farahani
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765
bfarahani@aqmd.gov

Re: Public Comments Proposed Revisions to Best Available Control Technology

Dear Bahareh:

RadTech represents over 800 members involved in the Ultraviolet/Electron Beam/Light Emitting Diode (UV/EB/LED) industry. We appreciate the opportunity to comment on the proposed Best Available Control Technology Guidelines. Our technology is pollution prevention technology and we appreciate the District's efforts to recognize it as an alternative to add-on control devices in the guidelines. Please see attached permits which may not have been reflected in the current guidelines, for consideration. The categories are as follows:

- Lithographic printing, UV web
- Lithographic printing, UV wide web
- Lithographic printing, UV sheet-fed

Additionally, a listing for a UV Flow Coater, Dip tank, Roller Coater, is currently listed under Section III, other technology. Please clarify why this application (A/N 323199) is listed in the emerging technologies section, considering that the permit was issued on May 5th, 1999. Thank you for your collaboration and we look forward to working with the BACT team.

Sincerely,

Rita M. Loof
Director, Environmental Affairs

Response Letter B-I (to RADTECH)

From: Bahareh Farahani <bfarahani@aqmd.gov>

Sent: Friday, March 10, 2023 4:36 PM

Cc: BACT Team <BACTTeam@aqmd.gov>

Subject: FW: RadTech Public Comments BACT Guidelines

Dear Rita:

I am writing to confirm the receipt of your comment letter. Thank you for providing us with copies of permitted UV technologies. We will contact our coating team regarding the lithographic printing and the use of UV. As you are aware when we looked at the UV/EB operation we were not able to acquire cost data. Could you please reach out to your members and provide us with cost data for the lithographic printing, UV?

Moreover, we are working on our BACT pages to update the links and information. Thanks for letting me know about A/N 323199 in Section III. I will review it and make required updates.

Thanks for your comments and suggestion.

Best Regards,

Bahareh Farahani (she/her)



Program Supervisor

Best Available Control Technology

Engineering & Permitting

South Coast Air Quality Management District

21865 Copley Drive

Diamond Bar, CA 91765

Tel.: (909) 396-2353

Email: bfarahani@aqmd.gov

Please refer to the next page for more details:

Response Letter B-II (to RADTECH)

From: Bahareh Farahani

Sent: Friday, December 22, 2023 6:13 PM

Subject: FW: RadTech Public Comments BACT Guidelines

Dear Rita:

Thanks for meeting with us to go over the existing Lithographic Printing and Flow Coater BACT/LAER listings. This is a follow up to my March 10th email regarding your comments on the updates to BACT Guidelines and meeting with BACT Team. I am summarizing your concerns as well as our recent discussions for reference and future consideration:

Comment #1: Concern that the Lithographic printing, UV technology including UV Web-fed, UV Wide-web and UV Sheet-fed, may not have been reflected in the current BACT guidelines.

Response #1: As we discussed, the BACT Guidelines, Part B, Section I has one listing for Lithographic Printing, Web-fed equipped with UV dryers under Printing (Graphic Arts) - Lithographic, Non-Heatset category. This equipment is located at Creative Mailing Inc. I included a hyperlink below for your reference: [Lithographic printing, UV Web](#)

Regarding Web and Wide-web, Rule 1130 defines Web-fed as an automatic system which supplies substrate from a continuous roll, or from an extrusion process. There is no distinction between Web and Wide-web in Rule 1130 and our permit engineers evaluate the application on a case-by-case basis.

Regarding lithographic printing, UV Sheet-fed, we reviewed the past 7 years of data and found a couple of permitted equipment using UV technology. Staff is working to ensure that Part B of the Guidelines for major polluting facilities is updated in the next round of BACT Guidelines to reflect the achieved in practice cases for this category. We are looking forward to meet with representatives from your industry to go over some of the questions we have on this category.

Please note that to include UV technology in minor source BACT Guidelines (Part D), South Coast AQMD is required to follow H&SC Section 40440.11 which specifies the criteria and process that must be followed to establish new minor source BACT limits for source categories listed in the Part D of the BACT Guidelines. This includes calculating total and incremental cost-effectiveness and determining that the incremental cost-effectiveness is less than South Coast AQMD's established cost-effectiveness criteria. In order for us to do this, we previously requested the cost information. If you are able to provide us with the cost data then we can conduct our evaluation.

Comment #2: There is a listing for a UV Flow Coater, Dip tank, Roller Coater, under Section III, other technology. Clarification on why this application (A/N 323199) is listed in the emerging technologies section, considering that the permit was issued on May 5th, 1999.

Response #2: There is a listing in Part B, Section II under Flow Coater. This BACT/LAER determination is based on a permitted equipment in SJVAPCD. The sheet coater is equipped with UV curing oven. Here is a link to the BACT determination: [Flow Coater](#).

Please review this determination and if it is in-line with the listing in section III (A/N 323199) and reflects the use of UV technology, let me know and I will modify Section III of the Guidelines accordingly.

Thank you for your time and consideration in reviewing the current BACT Guidelines and commenting on the Lithographic printing and Flow Coater, Dip tank, Roller Coater categories. We look forward to working with you to keep the BACT Guidelines up-to-date. The SRC's efforts are vital to ensure BACT/LAER listings receive a robust analysis. Should you have further questions or comments please contact me at 909-396-2353 or bfarahani@aqmd.gov.

Thank you,

Best Regards,

Bahareh Farahani (*she/her*)



Program Supervisor

Best Available Control Technology

Engineering & Permitting

South Coast Air Quality Management District

21865 Copley Drive

Diamond Bar, CA 91765

Tel.: (909) 396-2353

Email: bfarahani@aqmd.gov



Ramine Cromartie

Senior Manager, Southern California Region

August 24, 2023

Bhaskar Chandan, PE, QEP
Sr. Air Quality Engineering Manager
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Via e-mail at: BACTTeam@aqmd.gov

Re: WSPA Comments on Proposed Updates to BACT Guidelines

Dear Mr. Chandan,

Western States Petroleum Association (WSPA) appreciates the opportunity to participate as a member of the Best Achievable Control Technology (BACT) Scientific Review Committee (SRC) for the South Coast Air Quality Management District (SCAQMD). One of the goals of this committee is to provide comment on the proposed BACT listings for BACT Guidelines updates.

WSPA is a non-profit trade association representing companies that explore for, produce, refine, transport, and market petroleum, petroleum products, natural gas, renewable fuels, and other energy supplies in five western states including California. WSPA has been an active participant in air quality planning issues for over 30 years. WSPA-member companies operate petroleum refineries and other facilities in the South Coast Air Basin that are regulated by the SCAQMD and will be impacted by the proposed new and updated listings to the Lowest Achievable Emissions Rate (LAER)/BACT determinations.

On February 23, 2023, SCAQMD presented proposed new listings for the BACT Guidelines. These updates were discussed further in the July 23, 2023 BACT SRC Committee Meeting. WSPA offers the following comments/questions for additional consideration for each of the respective listings.

1. Part B – LAER/BACT Determination for Major Polluting Facilities, Section 1 – South Coast AQMD LAER/BACT Determinations: Heater, Natural Draft Operation, Natural Gas/Process Gas Fired

For this listing, SCAQMD shared the source test results for nitrogen oxides (NOx) and carbon monoxide (CO) for a heater used for flash distillation.

40 CFR Part 63 Subpart DDDDD, commonly referred to as the Boiler Maximum Achievable Control Technology (MACT) Rule, may be applicable to certain heaters subject to the proposed LAER/BACT determination. The Boiler MACT requires routine tune-ups of equipment subject to the rule¹. Heaters subject to Subpart DDDDD could exceed the proposed CO limit during tuning. As currently proposed, there is no exemption for tuning in the proposed LAER/BACT determination.

¹ 40 Code of Federal Regulations, Chapter I, Subchapter C, Part 63, Subpart DDDDD – National Emissions Standards or Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.

WSPA requests SCAQMD consider this operational mode while evaluating the proposed listing for CO.

2. Part B – LAER/BACT Determination for Major Polluting Facilities, Section 1 – South Coast AQMD LAER/BACT Determinations: Tank Truck Loading Racks

For this listing, SCAQMD shared the source test results for volatile organic compounds (VOCs) for a vapor recovery collection and disposal system that is connected to a storage tank and loading rack and vented to a thermal oxidizer.

WSPA requests that SCAQMD provide responses to the following questions:

- a. What is the technology evaluation that is driving this change for the LAER/BACT limit? Is this a stand-alone (thermal) technology or is it connected with another different technology?
- b. How are non-VOC emissions considered from the thermal heat input, i.e., NO_x, particulate matter (PM), sulfur oxides (SO_x), CO, others?
- c. Is the proposed LAER Limit a rolling average or instantaneous limit?

WSPA appreciates the opportunity to participate as a member of the BACT SRC. We look forward to continued discussion of BACT Guidelines. If you have any questions, please contact me at (310) 808-2146 or via e-mail at rcromartie@wspa.org.

Sincerely,



Cc:

Bahareh Farahani, SCAQMD
Bettina Burleigh Sanchez, SCAQMD
Patty Senecal, WSPA

Response Letter C (to WSPA)



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

November 16, 2023

Ramine Cromartie
Western States Petroleum Association
970 West 190th Street, Suite 304
Torrance, California 90502

Re: WSPA Comments on Proposed Updates to BACT Guidelines

Dear Ms. Cromartie:

Thank you for your letter dated August 24, 2023, regarding the Proposed Updates to BACT Guidelines. We appreciate your participation at the July 25, 2023 Scientific Review Committee (SRC) meeting.

Staff has reviewed your comment letter and is providing responses below to address your concerns.

Natural Gas/Process Gas Fired Heater

Comment #1: Concern that the BACT Guideline for Heater, Natural Draft Operation, Natural Gas/Process Gas Fired, as presented, does not include an exemption for the CO emission limits during tune-ups potentially required under 40 CFR Part 63 Subpart DDDDD. WSPA requests South Coast AQMD consider this operational mode while evaluating the proposed listing for CO.

Response #1: This BACT/LAER determination is based on an achieved in practice case and reflects the requirements listed in the permit issued for that equipment. This AIP case is located at a facility that is not a major source of HAP and therefore 40 CFR Part 63 Subpart DDDDD does not apply to this facility, and no condition related to the exemptions during tuning requirements were included. If the facility is subject to 40 CFR Part 63 Subpart DDDDD, then the proposed 100 ppm CO limit would not apply during tune-ups required under Subpart DDDDD. To address your concern and to ensure that the proposed BACT Guidelines align with actual BACT determination and achieved in practice case, staff included additional details in Sections (4)(D) of the Draft BACT/LAER form, which is attached to this letter, to clarify the applicability of the CO limit.

Tank Truck Fuel Loading Racks

Comment #2a: Question about what technology evaluation is driving the determination, and if it is a standalone technology or is it in combination with other equipment.

Response #2a: The current BACT requirements for “Liquid Transfer and Handling – Tank truck and rail car bulk loading, class A” are listed in Part D of the BACT Guidelines. The Guideline requires compliance with Rule 462 (0.08 lb of VOCs/1000 gal of organic liquid transferred). This BACT/LAER determination is driven by an achieved in practice case that has been permitted and operating for over 6 years in the South Coast Air Basin with a limit of 0.02 lb/1000 gal. The vapor recovery/control system consists of two vapor holders, a water knock-out tank, a metal detonation arrestor, a waste gas booster fan, and the direct flame thermal oxidizer. The vapors are collected and held in tanks until they are sent to the thermal oxidizer, which is the device that controls the VOC emissions. More details are included in the proposed BACT/LAER determination form, which is attached to this correspondence.

Comment #2b: Question about how non-VOC emissions are considered from the thermal heat input, i.e., NO_x, particulate matter (PM), sulfur oxides (SO_x), CO, others.

Response #2b: This BACT/LAER determination is only for the VOC emissions limit and control efficiency, and not for emissions associated with the thermal oxidizer. This proposal adds a new listing to the BACT Guidelines or VOC emission limit from Tank Truck Fuel Loading Racks equipped with a vapor recovery and disposal system to control VOC emissions. No limits for NO_x, PM, SO_x, or CO are being proposed with this BACT/LAER listing. The emissions from the thermal oxidizer are subject to a separate BACT listing category, and the thermal oxidizer has its own established limits in the BACT Guidelines (please refer to Thermal Oxidizer category under Part B, Section I of the BACT Guidelines and Rule 1147 for NO_x and CO limits).

Comment #2c: Question if the proposed LAER Limit is a rolling average or instantaneous limit.

Response #2c: This BACT/LAER determination requires the VOC emission rate to be measured in pounds of VOC per 1000 gallons of fuel transferred and must demonstrate a 99% overall control efficiency during the source test. Compliance with the emission limit is verified through source testing. The source test reference information is provided in the BACT determination form for staff’s review during permitting to ensure consistent implementation.

Staff appreciates your significant time and consideration in submitting comments to our proposed LAER determinations for Heater, Natural Draft Operation, Natural Gas/Process Gas Fired and Tank Truck Loading Racks. The SRC's efforts are vital to ensure BACT/LAER listings receive a robust analysis. Should you have further questions or comments please contact Bettina Burleigh Sanchez at 909-396-3245, Bahareh Farahani at 909-396-2353 or me at 909-396-3902 or bchandan@aqmd.gov

Sincerely,



Bhaskar Chandan, P.E., QEP
Senior Air Quality Engineering Manager
Refinery Permitting and BACT Team

Attachment:

Natural Gas/Process Gas Fired Heater – Draft BACT /LAER Determination Form

Cc:

Jason Aspell, Deputy Executive Officer, Engineering & Permitting (jaspell@aqmd.gov)
Jillian Wong, Assistant Deputy Executive Officer, Engineering & Permitting
(jwong1@aqmd.gov)
Bahareh Farahani, Program Supervisor, BACT Team (bfarahani@aqmd.gov)
Bettina Burleigh Sanchez, Senior Air Quality Engineer (bburleigh@aqmd.gov)

ATTACHMENT J



**South Coast
Air Quality Management District**

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SUBJECT: NOTICE OF EXEMPTION FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

PROJECT TITLE: PROPOSED AMENDMENTS TO THE BEST AVAILABLE CONTROL TECHNOLOGY (BACT) GUIDELINES

Pursuant to the California Environmental Quality Act (CEQA) Guidelines, the South Coast Air Quality Management District (South Coast AQMD), as Lead Agency, has prepared a Notice of Exemption pursuant to CEQA Guidelines Section 15062 – Notice of Exemption for the project identified above.

If the proposed project is approved, the Notice of Exemption will be filed for posting with the county clerks of Los Angeles, Orange, Riverside, and San Bernardino Counties. The Notice of Exemption will also be electronically filed with the State Clearinghouse of the Governor’s Office of Planning and Research for posting on their CEQAnet Web Portal which may be accessed via the following weblink: <https://ceqanet.opr.ca.gov/search/recent>. In addition, the Notice of Exemption will be electronically posted on the South Coast AQMD’s webpage which can be accessed via the following weblink: <http://www.aqmd.gov/nav/about/public-notice/ceqa-notice/notice-of-exemption/noe---year-2024>.

**NOTICE OF EXEMPTION FROM THE
CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)**

To: County Clerks for the Counties of Los Angeles, Orange, Riverside and San Bernardino; and Governor's Office of Planning and Research – State Clearinghouse

From: South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Project Title: Proposed Amendments to the Best Available Control Technology (BACT) Guidelines

Project Location: The proposed project is located within the South Coast Air Quality Management District's (South Coast AQMD) jurisdiction, which includes the four-county South Coast Air Basin (all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties), and the Riverside County portion of the Salton Sea Air Basin and the non-Palo Verde, Riverside County portion of the Mojave Desert Air Basin.

Description of Nature, Purpose, and Beneficiaries of Project: Amendments to the BACT Guidelines are proposed to the following sections to maintain consistency with recent changes to South Coast AQMD rules and state requirements and to include equipment and processes which have been achieved in practice: Overview: 1) Update the actual and potential emission threshold levels of volatile organic compounds (VOC) and nitrogen oxides (NOx) for major polluting facilities; and 2) update Footnote 7 to add a reference to Engineering Policy and Procedures.

Part B – Lowest Achievable Emission Rate (LAER) Determinations for Major Polluting Facilities: 1) Add four new listings to Section I – South Coast AQMD LAER/BACT Determinations: a) Heater, Natural Draft Operation, b) Linear Generator, Non-Emergency Electrical Generator, Natural Gas Fired, c) Sulfur Recovery (Claus) Unit, and d) Tank Truck Loading Racks; 2) Update the Fugitive Emission Sources at Petroleum Refineries in Section I – South Coast AQMD LAER/BACT Determinations; 3) add two new listings to Section II – Other LAER/BACT Determinations: a) Boiler, Natural Gas > 20 MMBtu/hr, and b) Heater, Natural Draft Operation; and 4) update the Gas Turbine -Simple Cycle, Natural Gas listing in Section II – Other LAER/BACT Determinations to reflect an achieved-in-practice case at a simple cycle power plant which was permitted in 2015 by the Bay Area Air Quality Management District.

Part C – Policy and Procedures for Non-Major Polluting Facilities: Update the Maximum Cost-Effectiveness Values in Table 5 for consistency with the third quarter 2023 Marshall and Swift equipment index in accordance with the BACT Guidelines policy.

Part D – BACT Determinations for Non-Major Polluting Facilities: Add one new listing for Crumb Rubber/Asphalt Oil Blending.

Finally, the following administrative changes to the BACT Guidelines are proposed: 1) Update all references to the United States Environmental Protection Agency or USEPA to refer to “U.S. EPA.”; 2) Update all references to “Engineering and Permitting” to refer to “Engineering and Compliance”; and 3) Update the footers.

Public Agency Approving Project:
South Coast Air Quality Management District

Agency Carrying Out Project:
South Coast Air Quality Management District

Exempt Status:

CEQA Guidelines Section 15061(b)(3) – Common Sense Exemption

CEQA Guidelines Section 15308 – Actions by Regulatory Agencies for Protection of the Environment

NOTICE OF EXEMPTION FROM CEQA (concluded)

Reasons why project is exempt: South Coast AQMD, as Lead Agency, has reviewed the proposed project pursuant to: 1) CEQA Guidelines Section 15002(k) – General Concepts, the three-step process for deciding which document to prepare for a project subject to CEQA; and 2) CEQA Guidelines Section 15061 – Review for Exemption, procedures for determining if a project is exempt from CEQA. Since the proposed project is comprised of new information and updates that reflect current practices of LAER/BACT determinations in the BACT Guidelines and the most current achieved-in-practice equipment and/or processes, and makes administrative amendments without requiring physical modifications, it can be seen with certainty that there is no possibility that the proposed project may have a significant adverse effect on the environment. Therefore, the proposed project is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3) – Common Sense Exemption. The proposed project is also categorically exempt from CEQA pursuant to CEQA Guidelines Section 15308 – Actions by Regulatory Agencies for Protection of the Environment, because the BACT Guidelines are designed to further protect or enhance the environment. Further, there is no substantial evidence indicating that any of the exceptions to the categorical exemption set forth in CEQA Guidelines Section 15300.2 – Exceptions, apply to the proposed project.

Date When Project Will Be Considered for Approval (subject to change):

South Coast AQMD Governing Board Public Hearing: February 2, 2024

CEQA Contact Person: Jivar Afshar	Phone Number: (909) 396-2040	Email: jafshar@aqmd.gov	Fax: (909) 396-3982
BACT Contact Person: Bahareh Farahani	Phone Number: (909) 396-2353	Email: bfarahani@aqmd.gov	Fax: (909) 396-3341

Date Received for Filing: _____ **Signature:** (Signed and Dated Upon Board Approval)
Kevin Ni
Acting Program Supervisor, CEQA
Planning, Rule Development, and
Implementation



Proposed Updates to BACT Guidelines

Board Meeting

February 2, 2024

Background

- Best Available Control Technology (BACT) guidelines are periodically updated to
 - Reflect advancements in technology and
 - Ensures affected equipment use the cleanest technologies
- BACT Guidelines are published for commonly permitted equipment:
 - Based on category or class of source
 - Source is defined as an individual permit unit
 - Engine, boiler, spray booth, etc.
 - Technical feasibility considered for the class and category of source

BACT is the most stringent emission limitation or control technique for a class and category of equipment that is:

Achieved In Practice, or

Contained In a State Implementation Plan (SIP), or

Technologically Feasible

Background (Cont'd)

- BACT is a major element of Regulation XIII - New Source Review (NSR)
- During permitting, NSR analysis is performed for
 - New sources
 - Relocated sources
 - Modifications to existing sources
- BACT is required if NSR analysis shows:

An emissions

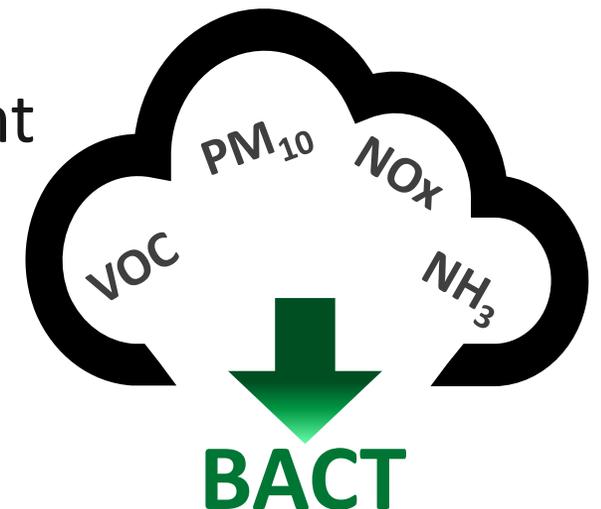
increase ≥ 1.0 lb/day



Nonattainment air contaminant
(NO_x, VOC, SO_x, PM₁₀)

Ozone depleting compound

Ammonia



BACT Guidelines Structure

BACT Guidelines Structure

➤ Overview

➤ Major Source BACT (LAER*)

➤ Non-Major (Minor) Source BACT

➤ Prevention of Significant Deterioration (PSD) for GHG

* Lowest Achievable Emission Rate

Facility Types

Major Source

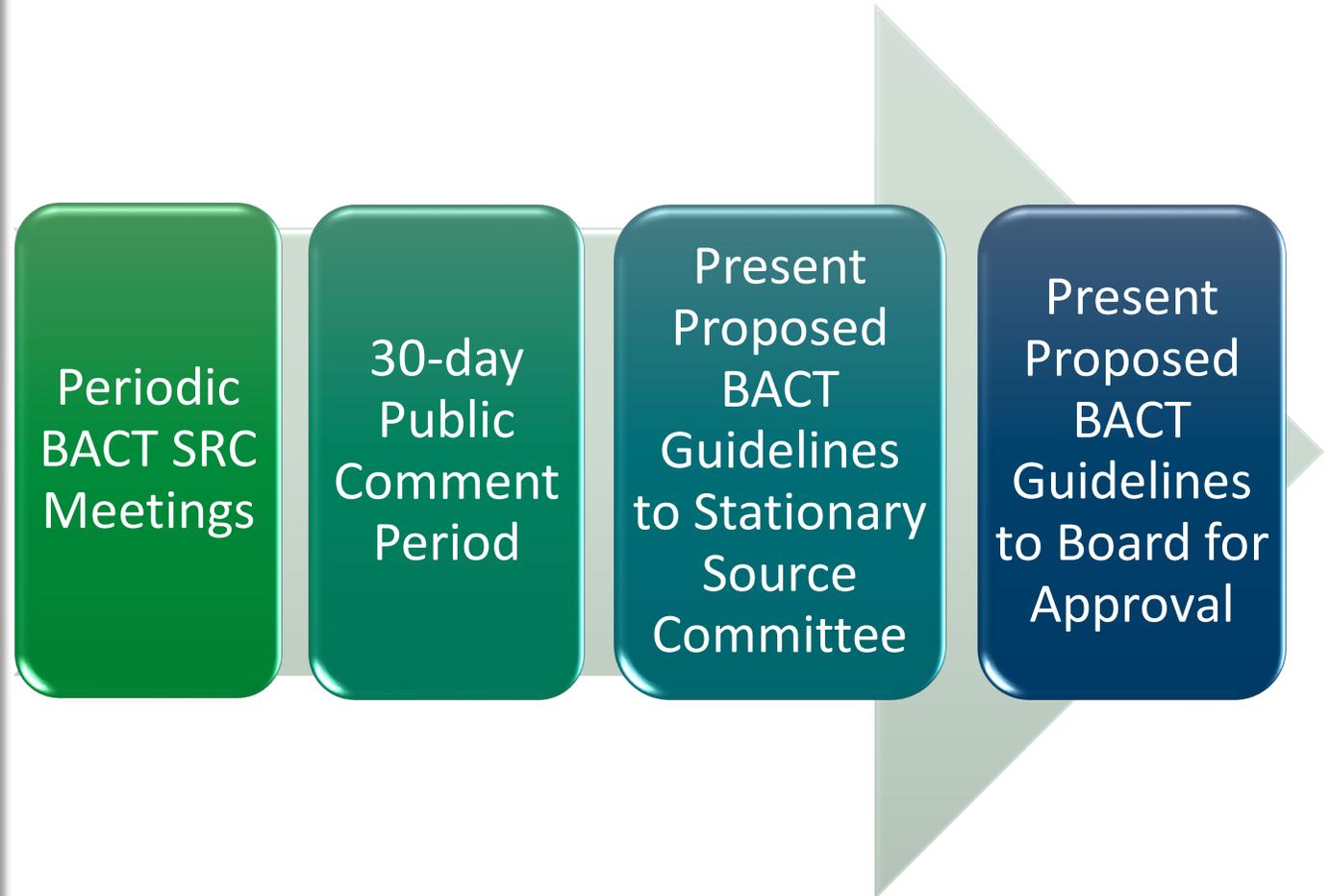
- Federal Title V facilities – LAER*
- Additional stringencies due to federal regulations
 - Does not allow for routine consideration of cost
 - Applicable at time of permitting

Non-Major (Minor) Source

- Smaller emitting facilities
- CA H&SC 40440.11
- Cost-effectiveness analysis required
- Requires Board approval
- Applicable at the time an application is deemed complete

Process to Update BACT Guidelines

- Updates to BACT Guidelines are subject to a public process which includes:
 - Review the most stringent emission limitation or control technique
 - Review the revised cost-effectiveness values
 - Technical review and comments by BACT Scientific Review Committee (SRC) which includes members from industry, other agencies, trade organizations, academia, and consultants



BACT Guidelines Proposed Updates

- Revise VOC and NOx thresholds for major polluting facilities to be consistent with Rule 1302
- Routine update of maximum incremental cost- effectiveness values
- New LAER/BACT listings and updates to existing listings:

Equipment Category	Current LAER/BACT	Proposed LAER/BACT Limit
Part B, Major Polluting Facilities (Section I)		
Fugitive Emission Sources at Petroleum Refineries	Leak Standard: 500 ppmv	Leak Standard: 200 ppmv
Heater, Natural Draft, Multiple burners	New listing	NOx: 7 ppmv @ 3% O ₂ dry CO: 100 ppmv @ 3% O ₂ dry
Linear Generator, Non-Emergency Electrical Generator, Natural Gas Fired	New listing	NOx: 2.5 ppmv @ 15% O ₂ dry CO: 12 ppmv @ 15% O ₂ dry VOC: 25 ppmv @ 15% O ₂ dry
Sulfur Recovery Unit	New listing	NOx: 0.05 lb/MMBTU natural gas CO: 0.03 lb/MMBTU natural gas SOx: 12 ppmv @ 0% O ₂ dry
Tank Truck Loading Racks	New listing	VOC: 0.02 lb/1000 gals

BACT Guidelines Proposed Updates (Cont'd)

Equipment Category	Current LAER/BACT	Proposed LAER/BACT Limit
Part B, Major Polluting Facilities (Section II)		
Boiler, Natural Gas Fired > 20 MMBTU/HR	New listing	NOx: 2.5 ppmv @ 3% O ₂ dry CO: 50 ppmv @ 3% O ₂ dry
Heater, Natural Draft, Single burner	New listing	NOx: 6 ppmv @ 3% O ₂ dry CO: 50 ppmv @ 3% O ₂ dry
Gas Turbine - Simple Cycle, Natural Gas	CO: 4 ppmv @ 15% O ₂ dry	CO: 2 ppmv @ 15% O ₂ dry
Part D, Non-Major Polluting Facilities		
Crumb Rubber/Asphalt Oil Blending System	New listing	VOC Control Efficiency: 90%*

* Determined to be cost-effective



Summary

- ✓ Part B: 8 Major Source LAER listings (Federal Title V facilities)
- ✓ Part D: 1 Non-Major Source BACT listing
- ✓ Update maximum incremental cost- effectiveness values
- ✓ Administrative updates to make the BACT Guidelines consistent with rules and regulations



Recommended Actions

Determine that the proposed amendments to the BACT Guidelines are exempt from the requirements of the CEQA

Approve Proposed Amendments to the BACT Guidelines