



# South Coast AQMD BACT Guidelines Overview

BACT Scientific Review Committee Meeting
June 4, 2025

Meeting Location: South Coast AQMD, Conference Room GB

Zoom Webinar: <a href="https://scaqmd.zoom.us/j/92579517440">https://scaqmd.zoom.us/j/92579517440</a>

**Webinar ID**: 925 7951 7440

**Call-in number**: 1-669-900-6833



South Coast AQMD BACT Guidelines

**BACT Scientific Review Committee** 

BACT LAER/BACT Listings Update Process

Cost-Effectiveness in BACT Determinations

Next Steps in the BACT Guidelines Update Process



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# South Coast AQMD BACT Guidelines BACT Applicability and Criteria



- Best Available Control Technology (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 an existing source
- BACT is required if NSR analysis shows:

**Emissions increase** 

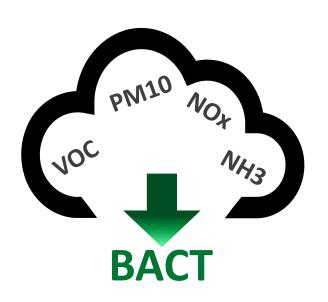
≥ 1.0 lb/day

(Cumulative increases within a 5-year period will be subject to BACT)

Nonattainment air contaminant (NOx, VOC, SOx, PM10)

Ozone depleting compound

**Ammonia** 



# South Coast AQMD BACT Guidelines Background



- BACT Guidelines are periodically updated to
  - Reflect advancements in technology
  - Ensure 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 & category of equipment that is:

Achieved in Practice (AIP), or

Contained in a State Implementation Plan (SIP), or

Technologically Feasible and Cost-Effective

# South Coast AQMD BACT Guidelines Structure and Facility Types



#### **BACT Guidelines Structure**

- Overview
- Parts A & B: Major Polluting Facilities LAER\*/BACT
- Parts C & D: Non-Major (Minor) Polluting Facilities BACT
- Parts E & F: Prevention of Significant Deterioration (PSD) for GHGs

#### **Facility Types**

#### **Major Polluting Facilities**

- Has the potential to emit criteria pollutants at or above
   Clean Air Act thresholds, depending on attainment status
- Additional stringencies due to federal regulations
- Does not allow for routine consideration of cost
- Determined based on info at time of permit to construct issuance

#### Non-Major (Minor) Polluting Facilities

- Smaller emitting facilities
- CA H&SC Section 40440.11
- Cost-effectiveness analysis required
- Requires Board approval
- Determined at the time an application is deemed complete

<sup>\*</sup> Lowest Achievable Emission Rate

### South Coast AQMD BACT Guidelines BACT Guidelines Update History and Process



- **✓ BACT Guidelines first published in 1983**
- Major revisions in 1988, 1995, and 1998 incorporated Clean Fuel guidelines and extended BACT listings
- December 1998 Governing Board approved new BACT process and format
- October 2000 Minor Source BACT adopted
- December 2016 Additional parts were added to address PSD requirement for GHG emissions
- Ongoing process to streamline the update process as well as reflect new lower emitting technologies

#### **BACT Team**

Notify SRC/Public regarding a proposed BACT listings/Guidelines update

#### SRC/Public

Comment on new/more stringent BACT determinations in permit(s)

Periodically provide reports to the Governing Board

Provide input on proposed processes and procedures in the BACT Guidelines



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### **BACT Scientific Review Committee** Introduction



- Originated from a 1994 initiative to update BACT Guidelines
- Established in 1995 by South Coast AQMD Governing Board as a standing committee:
  - To provide comments on proposed BACT Guidelines updates
  - To contribute knowledge and experience on technical issues
  - To assist staff in developing and implementing BACT procedures/methodologies
  - That is an advisory body composed of air quality experts
- BACT SRC Charter adopted in 2016 and available online on the BACT SRC webpage or <a href="https://www.aqmd.gov/docs/default-source/bact-src/bact-src-charter/amended-bact-src-charter/amended-bact-src-charter/o2012019.pdf">https://www.aqmd.gov/docs/default-source/bact-src/bact-src-charter/amended-bact-src-charter/o2012019.pdf</a>

# **BACT Scientific Review Committee Mission & Goals**

Goals



#### Mission

To assist and advise South
Coast AQMD staff in
ensuring BACT Guidelines
are developed in a clear,
consistent, and
technically sound public
process

Contribute to the development of the BACT Guidelines through a public process

Provide technical expertise on proposed BACT updates

Advise on a more predictable and certain BACT determination process

# **BACT Scientific Review Committee Key Objectives**



The BACT SRC achieves its goals by:

Providing written and verbal comments to South Coast AQMD staff on proposed BACT Guidelines

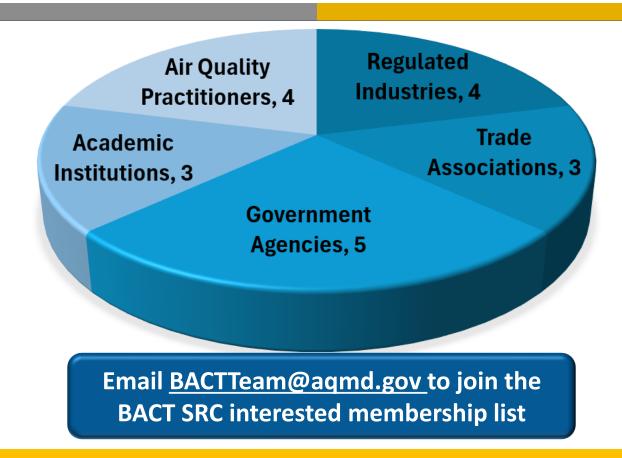
Sharing technical knowledge and encouraging discussion on Emerging Technologies

Ensuring BACT
Guidelines
align with
local, state, and federal
requirements

# **BACT Scientific Review Committee Membership Structure**



- Up to 19 members appointed by the Executive Officer
- Members are technical/scientific air quality professionals
- 2-year terms with reappointment eligibility
- Alternates allowed with Executive Officer approval



#### **BACT SRC Membership List**

https://www.aqmd.gov/docs/default-source/bact-src/bact-src membershiplist 042325.pdf

# **BACT Scientific Review Committee Public Meetings**



- Meetings held periodically during BACT updates
- Governed by Brown Act: public access and transparency required
  - Regular meetings Agenda posted 72 hours in advance
  - Posted in publicly accessible location for entire posting period within jurisdiction
- AB 1234 Ethics Training required for all members and alternates
- New BACT listings will be sent to SRC members at least one week prior to the SRC meeting
- 30-day public comment period for proposed amendments to BACT Guidelines followed by a final public BACT SRC meeting
- Report to the Stationary Source Committee and the Governing Board

# **BACT Scientific Review Committee Public Participation & Reporting**



- BACT SRC meetings are open to the public
- Teleconference Meeting:
  - Each teleconference location shall be accessible to the public
  - Each teleconference location shall be identified in the notice and agenda
  - Members of the public must be able to hear the meeting and testify from each location
  - Teleconference locations must be accessible to the disabled
  - Agenda must be posted at all teleconference locations
- Opportunity for public to comment on proposed Guidelines updates
- Prior permitting decisions not discussed unless relevant



South Coast AQMD BACT Guidelines

**BACT Scientific Review Committee** 

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# LAER/BACT Listings Update Process More Stringent LAER



- LAER/BACT Determinations for Major Polluting Facilities
  - Section I South Coast AQMD LAER/BACT Determinations
  - Section II Other LAER/BACT Determinations
  - Section III Other Technologies

- Achieved in Practice, or Contained in a State Implementation Plan
  - Required by federal law, as LAER for major sources
- LAER Update Process: Section I South Coast AQMD LAER/BACT Determinations
  - To make a LAER determination more stringent than current LAER
    - Notify the public and BACT SRC through a public process, provide 30-day public review
    - Include written comments in the BACT Docket
    - Evaluate comments filed during the 30-day period, before making a permit decision
    - Provide standing status reports to the Stationary Source Committee and to the Governing Board

# LAER/BACT Listings Update Process More Stringent BACT (cont'd)



- BACT Update Process:
  - To make BACT more stringent than LAER

or

- In establishing Non-major Polluting Facility BACT
  - Evaluate cost-effectiveness
  - Notify the public and BACT SRC through a public process, provide 30-day public review
  - Include written comments in the BACT Docket
  - Evaluate comments filed during the 30-day period, before making a permit decision
  - Provide a report to the Stationary Source Committee
  - Present to the Governing Board for approval at a public hearing
  - Update the BACT Guidelines

#### **Technologically Feasible and Cost-Effective**

Unique to South Coast AQMD and some other areas in California and allows for more stringent controls than LAER

# LAER/BACT Listings Update Process California Health and Safety Code Requirements for BACT



- Public Hearing Required: Hold a public hearing before approving any BACT Guideline revisions that change BACT policy or implementation procedures (per § 40440.10)
- Before establishing Non-major Polluting Facility BACT or making BACT more stringent than LAER for a source category:
  - Identify potential BACT control alternatives
  - Ensure proposed limit is AIP (≥1 year) with commercially available equipment/process
  - Assess cost-effectiveness of each alternative (annual cost per ton reduced)
  - Calculate incremental cost-effectiveness between options
  - Present proposed BACT revision to South Coast AQMD Governing Board

(per §40440.14)

Statewide clearinghouse: Use the State Board's statewide clearinghouse when updating BACT determinations (per § 40920.8)



South Coast AQMD BACT Guidelines

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AB 617 Technology Clearinghouse Update

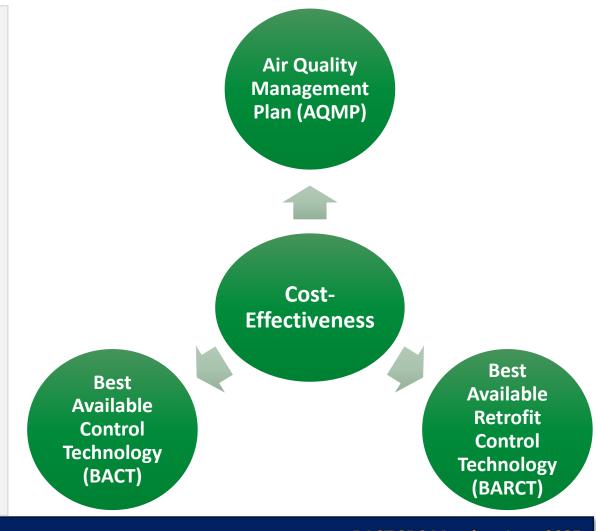
#### **Cost-Effectiveness in BACT Determinations**



#### What is Cost-Effectiveness (CE)?

- Required when establishing BACT standards beyond LAER as well as for Non-major Polluting Facilities\*
- Defined as " ... compared to measures as listed in AQMP or rules adopted by the Governing Board"\*\*
- Expressed as dollars per ton of emissions reduced
- Benchmarks based on control measures from the 1994 AQMP and adopted rules

\*\* Rule 1302 (h)(3)



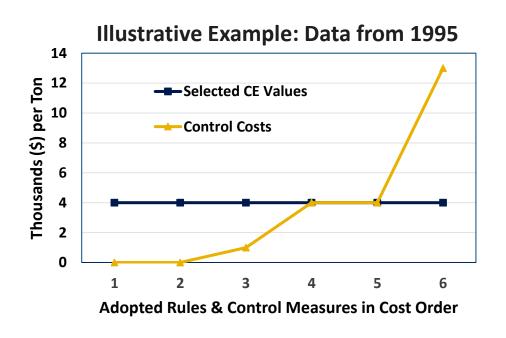
<sup>\*</sup> Per H&SC §40440.11





#### Cost-Effectiveness threshold basis:

**BACT:** Control cost as established in 1995 BACT Methodology Report and adjusted quarterly



	Average (Incremental) \$/ton*	2022 AQMP \$/ton**
ROG	\$42,037 (\$126,112)	\$36,000
NOx	\$39,748 (\$119,036)	\$325,000
SOx	\$21,019 (\$63,056)	_***
PM10	\$9,365 (\$27,886)	_***
СО	\$832 (\$2,393)	_***

<sup>\* 1&</sup>lt;sup>st</sup> Quarter 2025 – Adjusted quarterly using M&S Cost Index

**Note:** \$325,000 is mid-point between the estimates from the 2016 AQMP and 2035 benefits/ton of NOx estimate in CA (2021 Dollars) from three sectors, including monetized public health benefits

<sup>\*\* 2022 -</sup> Adjusted annually using the California CPI

<sup>\*\*\*</sup> No CE thresholds





Major Parameters in Cost-Effectiveness Analysis:



**Capital (One-time) Costs** 



**Annual Operating (Recurring) Costs** 



**Real Interest Rate** 



**Project/Equipment Life** 



**Emissions Reduced Over Project Life** 

# Cost-Effectiveness Methodology

- Discounted cash flow (DCF) method
- Calculate present value of all costs, applying present value factor (PVF) to annual costs



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### **Next Steps in the BACT Guidelines Update Process**



Please Provide Your Comments to

<u>BACTTeam@aqmd.gov</u>

Include "BACT Docket" in the Subject Line

BACT Scientific Review Committee Meetings\*
(2025)

Stationary Source Committee Meeting (Early to Mid 2026) Governing Board
Meeting
(Early to Mid 2026)

<sup>\*</sup> BACT Team provides a report to the Stationary Source Committee once proposed amendments to the BACT Guidelines have been presented at a public BACT SRC meeting initiating a 30-day comment period followed by a final public BACT SRC meeting.



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### **Stay Informed!**

#### Receive Newsletter Updates via <a href="www.aqmd.gov/sign-up">www.aqmd.gov/sign-up</a>

#### Sign Up

The South Coast AQMD offers periodic newsletter updates via Email on a variety of topics. Click on the Manage Subscriptions link at the bottom of the form to update your subscriptions (unsubscribe from lists, subscribe to additional lists, or change your Email address).

If you wish to receive daily pollution forecasts or alerts for specific pollution levels in your area, sign up for Air Alerts.

For printed copies of South Coast AQMD publications that mailed to you, please visit Subscription Services (charges may apply).

**Subscribe to:** 

**☑** BACT

**Guidelines** 

Email Address:	Re-Enter Email Address:
First Name (optional):	Last Name (optional):



#### **BACT Staff Contact Information**

#### Please contact staff with any questions or comments

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http://www.aqmd.gov/home/permits/bact



# AB 617 Technology Clearinghouse (TCH) Update for SRC

June 4, 2025

# **Technology Clearinghouse Background**

- 2017 California adopted Assembly Bill (AB) 617
  - Community-informed local emissions and exposure reduction actions
  - The Blueprint, adopted September 2018 and updated to Blueprint 2.0 October 2023
- Technology Clearinghouse goals:
  - One-stop-shop for new, existing, and Next-Generation Technology (NextGen)
  - Show data in a format that is useful to all user groups





# **User Groups**

#### **Public**

AB 617 Communities
Academia
General public

#### Government

Air Districts
CARB
EPA
Partner agencies

#### **Technology Users**

Sources subject to air emission regulations

#### **Manufacturers**

Add-on control technology mfrs. Low- & zero-emission technology mfrs. R&D labs Installers











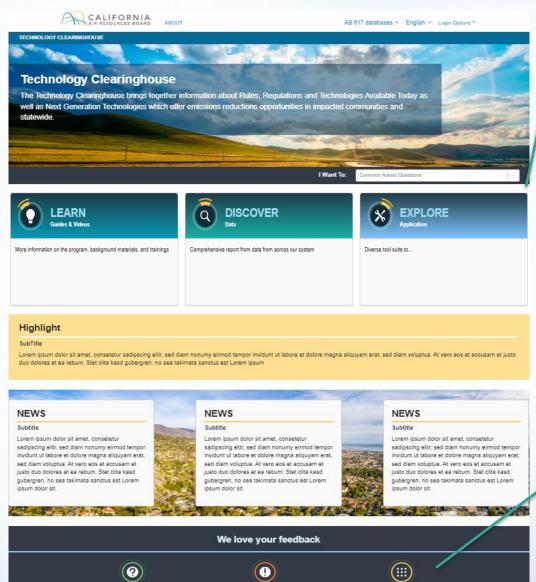


# Modules

Best Available Contraction Technology (BACT & T-BACT)		Next-Generation Technology (NextGen)	Support
Limits for <u>new or modifie</u> sources	Part of District Rules for <u>all</u> <u>existing</u> sources	Advanced solutions and technologies	Information, plans, actions and metrics for success



# **Beta Landing Page**



Submit a Request







TechnologyClearinghouse

Permitting Process

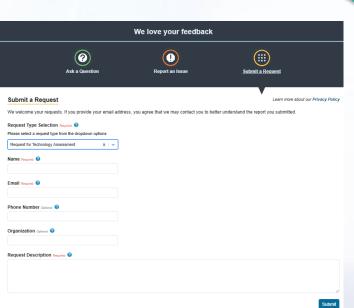
Clean Air
 Technology

- Search
- Comprehensive

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Visualization

- BACT
- Rules
- Next Gen



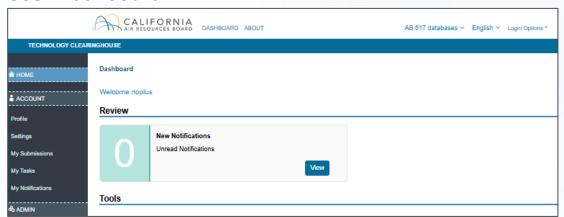


https://ww2.arb.ca.gov/capp/cst/air-quality-fundamentals

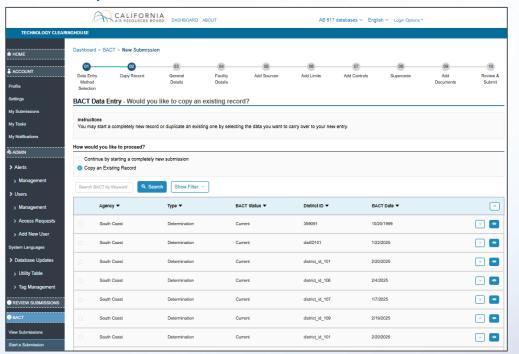


### **Beta User Screens**

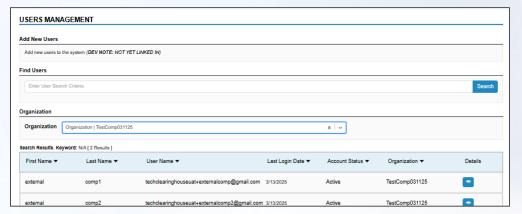
#### User Dashboard



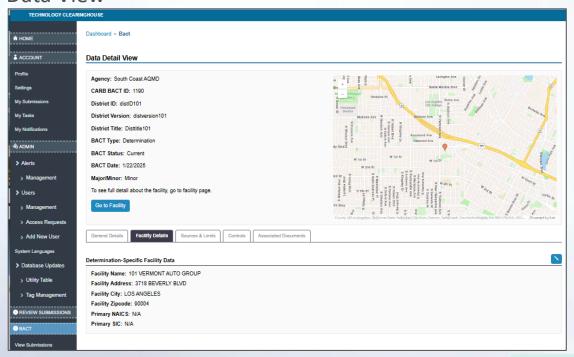
#### **Data Entry**



#### **User Management**



#### **Data View**





# **Next Steps**

- Web app launches Fall 2025
- TCH User Groups will have access to view and enter data
- CARB continues TCH work with:
  - Outreach/Training: promote awareness, provide webinars
  - Support: assist users, identify improvements
  - Assessment: NextGen technologies, special projects



