

PUBLIC WORKSHOP PAR 219 AND PAR 222



March 2, 2017
SCAQMD Headquarters
Diamond Bar, CA

Agenda

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

Rule 219 Background

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

Rule 222 Background

- ▣ Rule 222 - Filing Requirements For Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II
- ▣ Purpose
 - “. . . provide an alternative to written permits.”
- ▣ Applicability
 - 22 emission source categories
- ▣ Eligibility
 - Exempt per Rule 219
 - Compliance with all applicable rules
- ▣ Adopted in 1998
 - Amended 4 times
 - Latest amendment in 2013

Rule Development Process

- ▣ Began Rulemaking in spring 2016
- ▣ Reviewed numerous requests for changes
 - 40+ from internal stakeholders
 - 18 requests from external stakeholders
- ▣ Several internal meetings with P&E and E&C staff
- ▣ Site visits and meetings
- ▣ Two working group meetings
 - August 2, 2016
 - November 10, 2016
- ▣ Public Workshop
- ▣ May 2017 Board Hearing

Staff Proposal

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

Description of Amendments

Rule Citation	Source Category	Description of Amendment
(b)(1)	Engines used at remote 2-way radio transmission towers	Add LPG and CNG as allowable fuels in addition to diesel
(b)(2)	Combustion equipment (food ovens)*	Minor clarification
(b)(5)	Fuel cells*	Clarification to restore original intent of exemption
(b)(8) and (r)(1)	PERP equipment	Consolidate all PERP language under paragraph (r)(1)
(c)(11)	Sub-slab ventilation systems	New source category for exemption
(d)(3)	Cooling towers*	Require industrial cooling towers to register under Rule 222
(e)(8)	Welding, oxy/gas fuel cutting, laser etching and engraving equipment excluding alloys containing chromium, cadmium, nickel, or lead	Exempt hand-held equipment. Establish low level for toxic impurities
(g)(2)	Shredding of wood products	Remove treated woods and greenwaste from exemption

*Requires registration under Rule 222

Description of Amendments (*cont*)

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

*Requires registration under Rule 222

PAR 219 – Proposed New Source Categories for Exemption

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

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

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

PAR 219 Proposed Additions or Modifications *(cont)*

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

PAR 219 Proposed Additions or Modifications *(cont)*

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

PAR 219 Proposed Additions or Modifications *(cont)*

- ▣ Welding, oxy-gas fuel cutting, laser cutting equipment [(e)(8)]
 - Add hand-held plasma-arc and laser cutting equipment to exemption
 - Limit exemption for cutting of stainless steel or alloys containing >0.1% by weight of Cr, Ni, Cd or Pb
 - Limit exemption for laser cutting, etching and engraving equipment rated >400 watts
- ▣ Wood products [(g)(2)]
 - Limit exemption by excluding painted wood or wood treated for exterior exposure
 - Limit exemption by excluding greenwaste

PAR 219 Proposed Additions or Modifications *(cont)*

- ▣ UV/EB and UV/LED materials used in:
 - Printing & related coating and/or laminating [(h)(1)(C)]
 - Coating or adhesive application, or laminating [(l)(6)(B)]
 - Drying equipment [(l)(11)(B)]
- ▣ Exemption(s) applicable if:
 - All materials must have VOC content <25 g/l
 - All clean-up solvents must have VOC content <25 g/l
 - Total quantity of VOC emissions <1 ton/yr
 - Facility keeps records to demonstrate compliance

PAR 219 Proposed Additions or Modifications *(cont)*

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

PAR 219 Proposed Additions or Modifications *(cont)*

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

PAR 219 Proposed Additions or Modifications *(cont)*

- ▣ Equipment for surface preparation [(p)(4)]
 - Limit exemption for heated surface prep tanks under (p)(4)(F) and for tanks containing Pb
 - Limit exemption for all tanks containing chromium
 - Limit exemption for tanks that are rectified, sparged or heated and contain Ni, Pb or Cd
- ▣ Equipment for plating, stripping or anodizing of metals [(p)(5)]
 - Limit exemption for all tanks containing chromium
 - Limit exemption for tanks that are rectified, sparged or heated and contain Ni, Pb or Cd

PAR 219 Proposed Additions or Modifications *(cont)*

- ▣ Paper shredding, carpet and paper shearing [(p)(10)]
 - Add fabric brushing and sueding to exemption
 - Limit exemption by excluding carpet and fabric recycling operations
- ▣ Exceptions to Exemptions [(s)(4), (s)(5)]
 - New exception for equipment subject to permitting under Regulation XIV
 - New exception for equipment that is an integral part of a series of permitted items, unless that equipment is already described on an SCAQMD permit

PAR 219 – Revisions to Existing Exemptions

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

PAR 219 – Revisions to Existing Exemptions

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

PAR 219 – Revisions to Existing Exemptions *(cont)*

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

PAR 219 Proposed Revision

Language [(q)(2)]

Pollutant (Tons/Year)	South Coast Air Basin	Riverside County Portion of Salton Sea Air Basin	Riverside County Portion of Mojave Desert Air Basin
VOC	5.0	12.5	50.0
NOx	5.0	12.5	50.0
SOx	50.0 <u>35.0</u>	50.0 <u>35.0</u>	50.0
CO	25.0	50.0	50.0
PM10	35.0	35.0	50.0
Single Hazardous Air Pollutant	5.0	5.0	5.0
Combination Hazardous Air Pollutants	12.5	12.5	12.5

Alignment with Rule 1302 – Definitions, Amended 11-4-16

Previously Exempt Rule 219

Equipment subject to Permitting

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

Previously Exempt Rule 219

Equipment subject to Permitting

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

PAR 219 Exemption Requests by Stakeholders*

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

*Described further in Preliminary Draft Staff Report beginning on page 2-25, Table 2-4

⁺PD = Proposal Deferred, I = Incorporated, PI = Partially Incorporated

PAR 222 Proposed Additions to Filing Program

- ▣ Industrial cooling towers
- ▣ Natural gas and crude oil production equipment
 - Natural gas pipeline transfer pumps
 - Natural gas repressurizing equipment
- ▣ Storage tanks for aqueous urea storage

PAR 222 Modifications to Existing Equipment Categories

- ▣ Food Ovens
 - 1 lb/day VOC limit applicable to all process VOC emissions, not only to yeast fermentation
- ▣ Fuel Cells
 - Only fuel cells with combustion-based supplemental heating source need to be registered
- ▣ Engines for Electrical Generation at Remote, 2-way Radio Transmission Towers
 - Adding cleaner fuels (CNG & LPG) in addition to diesel #2

Next Steps

- ▣ Complete Impacts Assessments
 - Emissions and facility inventories
 - Socioeconomic
 - CEQA
- ▣ Additional feedback on staff proposal
 - Requested by March 10, 2017
- ▣ Stationary Source Committee meeting - March 17, 2017
- ▣ Set public hearing – April 7, 2017
- ▣ Board hearing – May 5, 2017

Remaining Rulemaking Schedule

Meeting	Date
Stationary Source Committee	March 17, 2017
Set Hearing	April 7, 2017
Public Hearing	May 5, 2017

PUBLIC COMMENTS