Plans And Rules And Control Measures

Oh My!

Clean Air Act — Thou shalt have clean air

NAAQS — This is clean air

SIP — How the State is meeting NAAQS

NAAQS

Ambient Air Monitoring

Within limits

Outside of limits

In Attainment

PSD rules in SIP

Non-attainment

Need attainment plan

Attainment Plan

Control Measures

What sources we'll control to reach attainment

Programs or New/Amended Rules

Rules go into SIP

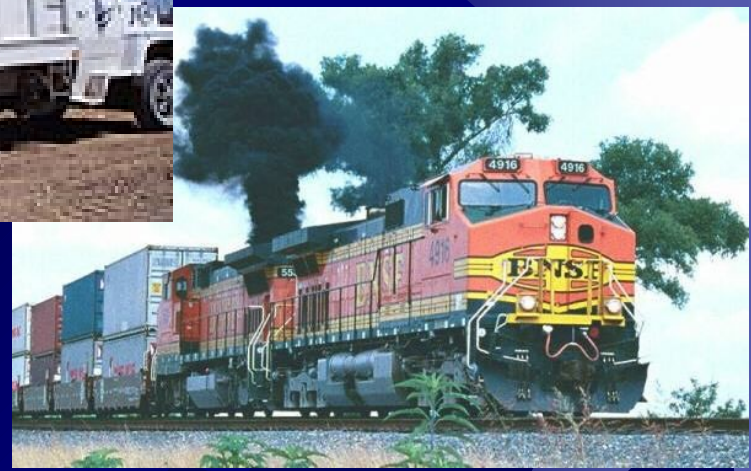
Control Measure Strategy

- Look at emissions inventory,
- Assess current control from existing rules, and
- Look at categories for possible new control.

Look at Emissions Inventory

Emission Sources


SCHOOL BUS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Emission Inventory Structure

- Point Sources
- Area Sources
- Mobile Sources

- Emission inventory kept by ARB
- Emissions divided into EICs

  xxx-xxx-xxxx-xxxx

There are over 2,600 EICs used by the District

Assess Current Controls

Rule “Map”

Relate District rules and EICs

Rule-to-EIC relationship

- Rule may relate to more than one EIC

Example – District Rule 4607 (Graphic Arts)

- Applies to lithography, letter press, screen printing, and flexography (and more).
- Each printing technology has one or more EICs associated with it.

EIC-to-rule relationship

- EIC may relate to more than one rule
  - Example – Fuel Combustion/Boilers
    - One EIC for all boilers burning fuel oil
    - District boiler rules address boilers by “size”
- Some EICs have no associated rules
  - Example – Light Duty Trucks
    - District doesn’t have authority to regulate

Current Rule Requirements

Current emissions vs. uncontrolled

Current rule applicability

Current rule limits

Current rule exemptions

Potential for Emission Reductions

Limits in other air districts

All feasible controls

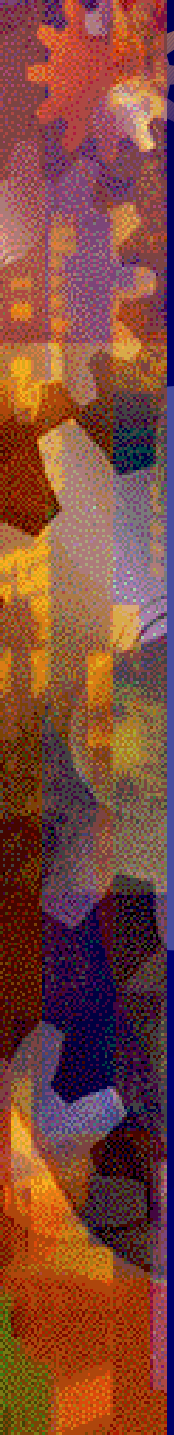
BACT – federal, state, District clearinghouse

Background research

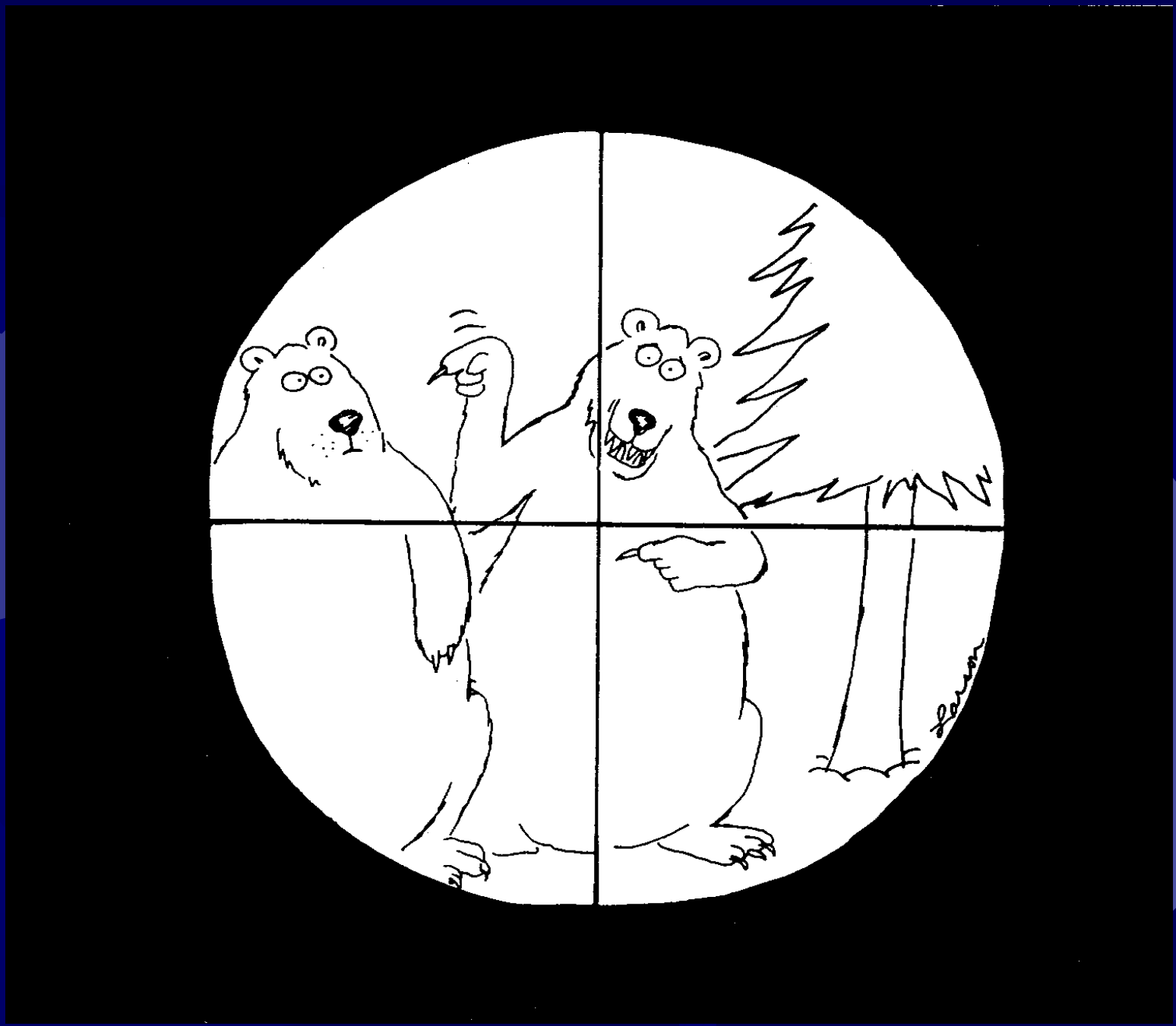
State-of-the-art technology

Apply to District Sources

- Number of facilities in District
- Number of sources at each facility
- Current level of control
  - Permit conditions
  - How many exempt
  - How many at BACT
  - What portion are at large/small facilities
- Cost of control technology (ballpark)
- Potential quantity emission reductions
- Potential time line for rule implementation



Look at possible new categories to control



“Other”

- Any source (EIC) that has no rule associated with it.
- Exempted sources
- Non-traditional sources

Building a Control Measure

Information needed

- Emission Inventory
- District Rule
- Rule Map
- Related rules in SCAQMD, BAAQMD, VCAPCD, SDCAPCD
- District Permits Database
- District/State/Federal BACT Clearinghouse

Rule 4684 – Polyester Resin

Rule applies to commercial/industrial polyester resin facilities

- Composites (resin + fiberglass)
- Boats/yachts
- Shower enclosures
- Spas

“Chemical – Fiberglass & Fiberglass Products”

Question:

- Does this category include the facility that produces fiberglass for building insulation?
- Does a facility that makes shower enclosures have its emissions reported to this category?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EI Issues

- EI seems “too large” or “too small” for category
- Area sources associated with point source-only category or vice versa
- No inventory

Rule 4354
Glass Melting Furnaces

- Rule controls NOx, VOC, CO, & SOx from glass melting furnaces
- Large amounts of NOx from this source category – run 24/7
- District has container glass, flat glass, and fiberglass furnaces - 15 furnaces at 8 sources

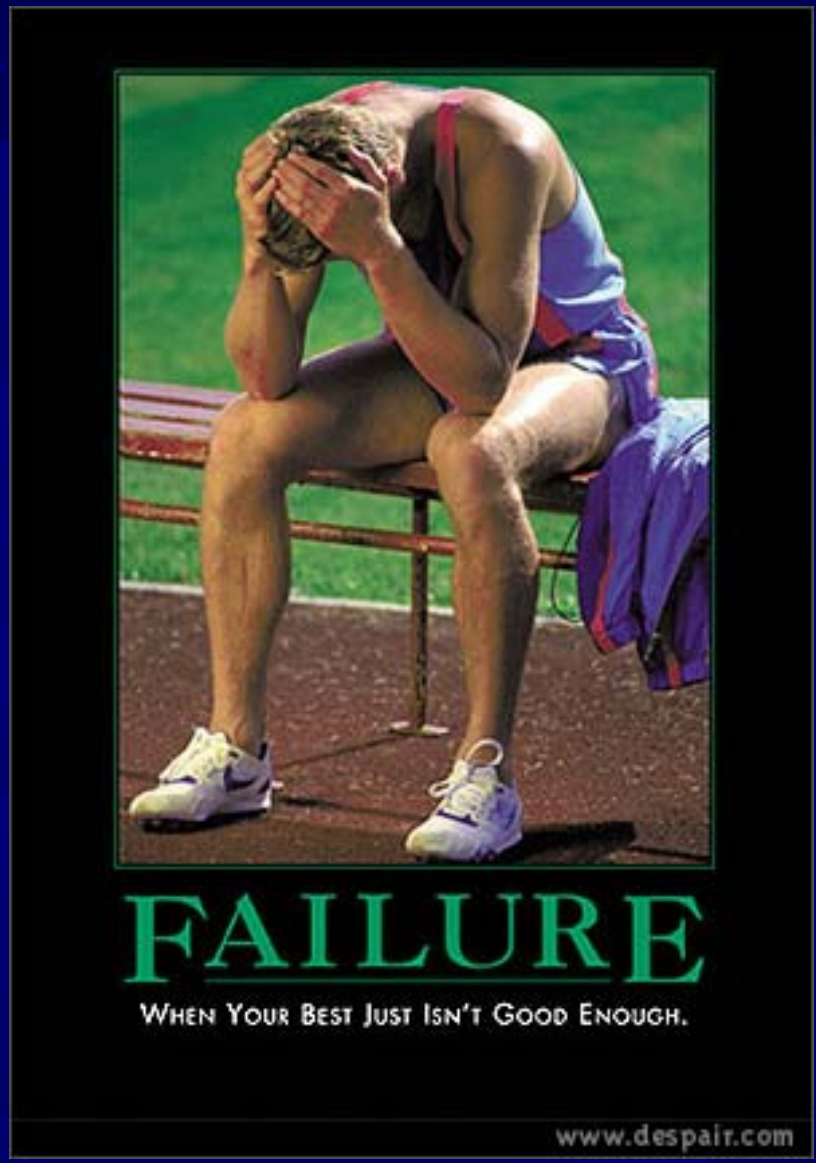
Assessment

- Two different firing technologies in use in District that are BACT
- Europe has add-on control technology – potential for even lower NOx limits

Caveat!

Long time between rebuilds (8 to 10 years)

No emissions reductions anytime soon.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Final Thoughts

- CMs are the heart of the attainment plan
- CMs are only as good as the underlying information
- Finding “good” CMs is hard