

Update on Best Available Retrofit Control Technology (BARCT) Rule Evaluation

San Joaquin Valley Air Pollution Control District
Public Workshop
April 20, 2021

Attendees via Zoom

Please “raise your hand” for comments and questions

Comments via email

webcast@valleyair.org

(Please include your name and affiliation)

Decades of Stringent Air Quality Regulations

- District has long evaluated and implemented stringent control measures across all sources under its jurisdiction in efforts to attain federal standards
 - Adopted over 650 rules and rule amendments in order to control emissions from stationary sources and other local sources
 - District's New Source Review permitting regulation requires the use of the Best Available Control Technology (BACT)
- District stationary sources subject to BARCT since 1980s
- Robust and ongoing analysis necessary to demonstrate that District's rules continue to meet state and federal requirements, including BARCT
 - Increasingly stringent air quality standards
 - Control technologies continually evolving

Update on AB 617 BARCT Review

- Best Available Retrofit Control Technology (BARCT) is an air emission limit for existing sources and is maximum degree of reduction achievable, taking into account environmental, energy and economic impacts
- AB 617 requires expedited BARCT review and implementation schedule for facilities in CARB's Cap-and-Trade Program
 - AB 617 expedited BARCT requirements applicable to equipment that has not implemented BARCT since 2007
 - 109 facilities in San Joaquin Valley subject to expedited BARCT review
 - District adopted schedule in December 2018, initially identified 16 rules subject to additional BARCT review
- Workshop held July 2020 provided update on rules evaluated in 2019

Status of BARCT Implementation Schedule

Rule	Title	Determination Status	Determination Schedule	Anticipated District Rule Adoption Date (if necessary)
4454	Refinery Process Unit Turnaround	Removed from Schedule - Rule Meets BARCT	2019	n/a
4641	Cutback, Slow Cure, And Emulsified Asphalt, Paving And Maintenance Operations	Removed from Schedule - Rule Meets BARCT	2019	n/a
4104	Reduction of Animal Matter	Removed from Schedule - Rule Meets BARCT	2019	n/a
4409	Components at Light Crude Oil Production Facilities, Natural Gas Production Facilities, and Natural Gas Processing Facilities	Rule Development in Progress	2019	Q4 2021
4455	Components at Petroleum Refineries, Gas Liquids Processing Facilities, and Chemical Plants	Rule Development in Progress	2019	Q4 2021
4702	Internal Combustion Engines (VOC only)	Rule Development in Progress	2020	Q2 2021
4623	Storage of Organic Liquids	Rule Development in Progress	2020	Q4 2021

Status of BARCT Implementation Schedule

Rule	Title	Determination Status	Determination Schedule	Anticipated District Rule Adoption Date (if necessary)
4694	Wine Fermentation and Storage Tanks	Removed from Schedule - Emission Units Exempt from Schedule under CH&SC § 40920.6(c)(3)	2020	n/a
4624	Transfer of Organic Liquid	Rule Development in Progress	2020	Q4 2021
4603	Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts	Removed from Schedule - Rule Meets BARCT	2020	n/a
4601	Architectural Coatings	Completed - BARCT Rule Adopted	2020	n/a
4401	Steam-Enhanced Crude Oil Production Wells	Rule Development in Progress	2021	Q4 2021
4566	Organic Material Composting Operations	Removed from Schedule - Emission Units Exempt from Schedule under CH&SC § 40920.6(c)(3)	2021	n/a
4625	Wastewater Separators	Under Evaluation in 2021	2021	2022
4621	Gasoline Transfer Into Stationary Storage Containers, Delivery Vessels, and Bulk Plant	Under Evaluation in 2021	2021	2022
4402	Crude Oil Production Sumps	Under Evaluation in 2021	2021	2022

Update on AB 617 BARCT Review

- 2020 findings (five rules):
 - The following rule was determined to meet BARCT
 - Rule 4603 Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts
 - The following two rules were determined to not be subject to the expedited BARCT evaluation Schedule
 - Rule 4694 Wine Fermentation and Storage Tanks
 - Rule 4566 Organic Material Composting Operations
 - The following rules required a rule development process to satisfy BARCT
 - Rule 4601 Architectural Coatings – rule amended 4/16/2020
 - Rule 4702 Internal Combustion Engines (VOC only) – rule development in progress

District Rule 4601

- District Rule 4601 applies to the following source categories:
 - The manufacture, sale or use of architectural coatings within the District
- Benchmarks Evaluated
 - BAAQMD Reg. 8, Rule 3 – Architectural Coatings
 - SCAQMD Rule 1113 – Architectural Coatings
 - SMAQMD Rule 442 – Architectural Coatings
 - VCAPCD Rule 74.2 – Architectural Coatings
 - CARB Suggested Control Measure (SCM) (2019)
- Conclusion
 - After the preliminary BARCT analysis, Rule 4601 was amended on 4/16/2020 to incorporate the 2019 CARB SCM for architectural coatings and add contingency measures to remove small container exemption
 - The amended requirements of Rule 4601 satisfy BARCT

District Rule 4603

- District Rule 4603 applies to the following source categories:
 - Surface coating of metal parts or products, large appliances parts or products, metal furniture, and plastic parts and products, automotive/transportation and business machine plastic parts and products, and pleasure crafts
- Benchmarks Evaluated
 - BAAQMD Reg. 8, Rule 19 – Surface Preparation and Coating of Miscellaneous Metal Parts and Products
 - SCAQMD Rule 1107 – Coating of Metal Parts and Products
 - SMAQMD Rule 4451 – Surface Coating of Misc. Metal Parts and Products
 - VCAPCD Rule 74.12 – Surface Coating of Metal Parts and Products
 - EPA NESHAP Subpart MMM Surface Coating of Metal Parts and Products
 - EPA NESHAP Subpart HHHHH Paint Stripping and Misc. Surface Coating at Area Sources
- Conclusion
 - Analysis determined there are no federal, state, or other air district rules are more stringent than Rule 4603
 - District Rule 4603 satisfies BARCT

District Rule 4702

- District Rule 4702 applies to the following source categories:
 - Internal Combustion Engines
- BARCT status
 - Rule 4702 determined to satisfy BARCT requirements for NO_x in 2018 Expedited BARCT Schedule
 - Further BARCT analysis was required for VOC only
- Rule development process
 - Rule 4702 rule development process began in 2020 to increase the stringency of NO_x and VOC emission limits for certain IC engines
 - Next rule workshop scheduled for Q2 2021

District Rule 4694

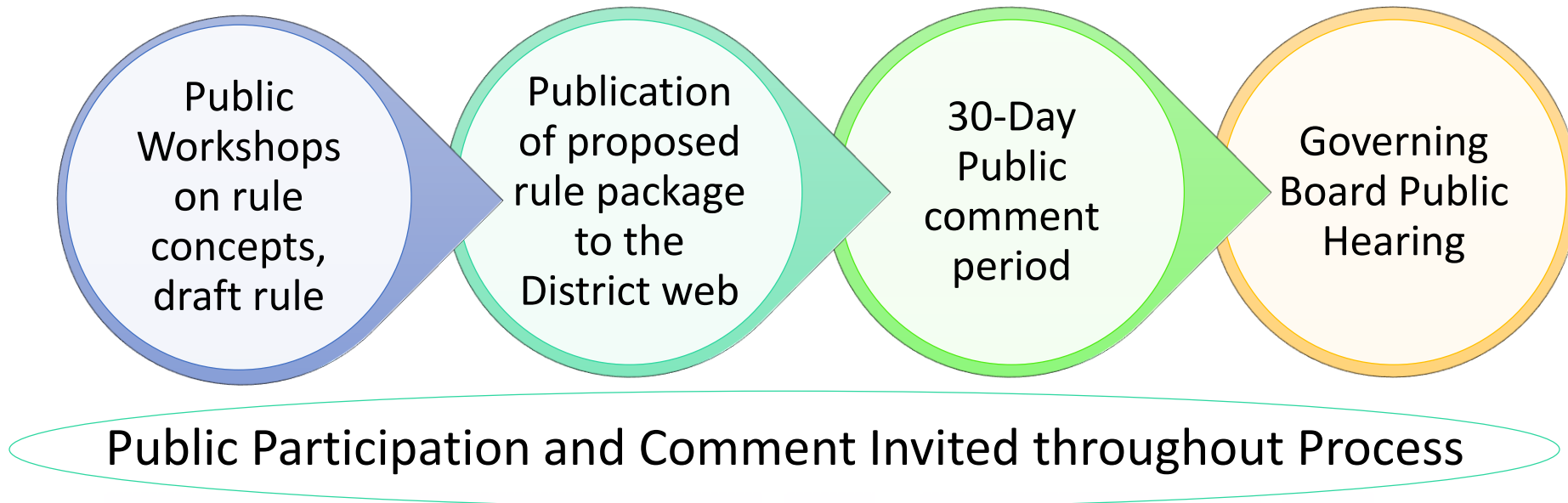
- District Rule 4694 applies to the following source categories:
 - Wine Fermentation and Storage Tanks
- One facility subject to CARB’s Cap-and-Trade Program was also subject to the requirements of Rule 4694.
- Requirements for Expedited BARCT Implementation Schedule
 - Specified in CH&SC Section 40920.6
 - Section 40920.6(c)(3) states “... The schedule shall not apply to an emission unit that has implemented BARCT due to a permit revision or new permit issuance since 2007.”
- Rule 4694 was adopted on 12/15/05 and determined to meet BARCT at that time. Further, Rule 4694 determined to meet BARCT in the District’s 2007 Ozone Plan.
- Per the Rule 4694 compliance schedule, permits for this facility were revised after 2007 to comply with Rule 4694, therefore the expedited BARCT implementation schedule does not apply per CH&SC Section 40920.6(c)(3).
- Therefore, Rule 4694 is not subject to expedited BARCT review.

District Rule 4566

- District Rule 4566 applies to the following source categories:
 - Organic Material Composting Operations
- One facility subject to CARB's Cap-and-Trade Program was also subject to the requirements of Rule 4566
- Requirements for Expedited BARCT Implementation Schedule
 - Specified in CH&SC Section 40920.6
 - Section 40920.6(c)(3) states "... The schedule shall not apply to an emission unit that has implemented BARCT due to a permit revision or new permit issuance since 2007."
- Rule 4566 was adopted on 8/18/11 and determined to meet BARCT at that time
 - Further, Rule 4566 determined to meet BARCT in the District's 2013 Ozone Plan
- Per the Rule 4566 compliance schedule, permits for this facility were revised after 2007 to comply with Rule 4566, therefore the expedited BARCT implementation schedule does not apply per CH&SC Section 40920.6(c)(3)
- Therefore, Rule 4566 is not subject to expedited BARCT review

District Rule Making Process (if required)

- District rules developed through transparent public process, with emphasis placed on providing opportunities for public engagement and feedback through workshops and comment periods
- Updates provided to Governing Board, Citizens Advisory Committee and Environmental Justice Advisory Group
- Evening workshops held, interpretation services available



Public Comments

Attendees via Zoom

Please “raise your hand”
for comments and questions

Comments via email

webcast@valleyair.org

(Please include your name and affiliation)

More information available on District’s AB 617 website

<http://community.valleyair.org/>

Or call for more information: (559) 230-6000