## PROPOSED RULE 1147.1 WORKING GROUP MEETING #6

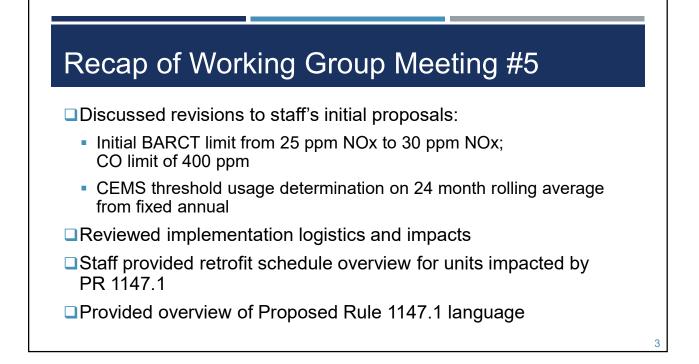
APRIL 29, 2021 SOUTH COAST AQMD DIAMOND BAR, CA

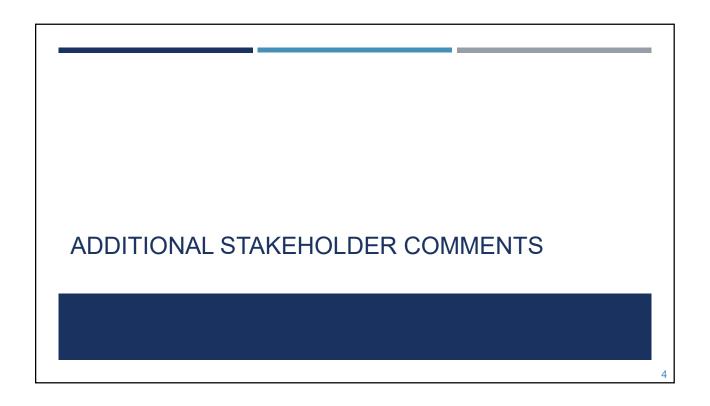
Zoom Meeting: Meeting ID: Conference Call:

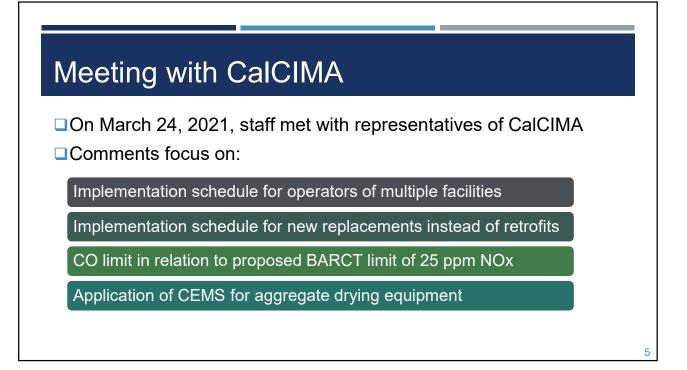
https://scaqmd.zoom.us/j/93977169209 939 7716 9209 (669) 900-6833

# Agenda

- Recap of Previous Working Group
- Response to Comments
- □ Proposed Rule Language
  - Key Terms and Definitions
  - BARCT Limit
  - Implementation Schedule
  - Monitoring Requirements
- □Next Steps









Comment:

- Operators with multiple facilities expressed concerns for units that will be on the same or similar compliance schedule
- Operators commented that requiring operators to meet the proposed NOx concentration limit 12 months after the permit to construct is issued is not sufficient

#### □ Staff Response:

- Based on discussion with equipment vendors, staff is proposing to extend the time for facilities to meet the proposed NOx concentration limit from 12 to 18 months after the permit to construct is issued
  - Allows all operators, particularly those with multiple facilities additional flexibility to meet NOx concentration limits and to minimize operational disruptions

### Implementation Schedule for New Replacements

#### Comment:

 Operators commented that equipment replacements will have difficulty meeting the proposed NOx concentration limit within 12 months after the permit to construct is issued

#### Staff Response:

- Staff met with the stakeholder and equipment vendors to better understand the process involved with equipment replacements
- Units to be replaced would be given 36 months to permanently shut down
- Additional time provides operators to manage the installation of new unit and to decommission replaced unit



#### Comment:

- Operators commented that the proposed NOx limit of 30 ppm would create challenges for some facilities to comply with 400 ppm CO depending on quality of aggregate being processed
- Stakeholders have also mentioned that aggregate quality is difficult to control and varies throughout the Basin

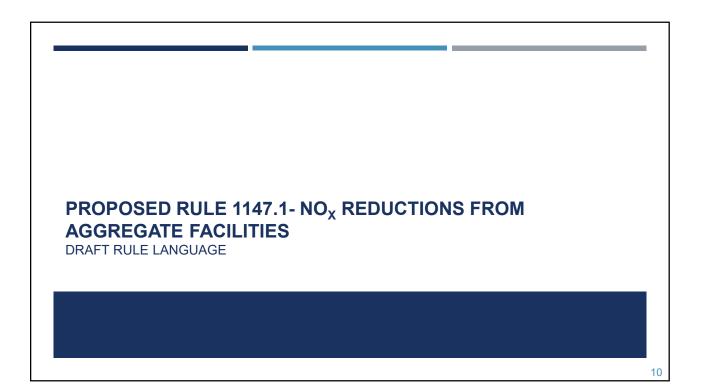
#### □ Staff Response:

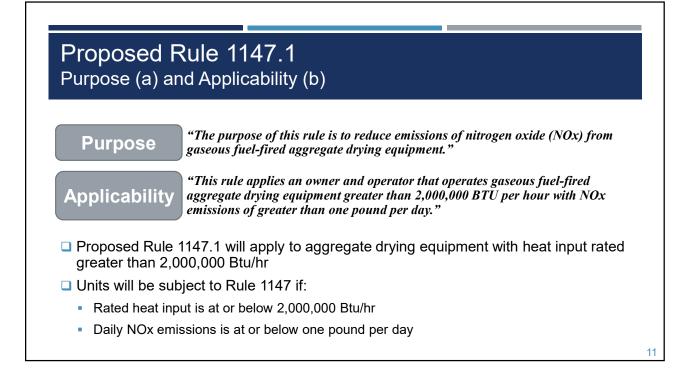
- Staff is proposing to increase the CO limit from 400 ppm to 800 ppm while maintaining the proposed NOx limit of 30 ppm
- Increasing the CO limit will better address the variation in aggregate, and better ensure operators can meet the proposed 30 ppm NOx limit

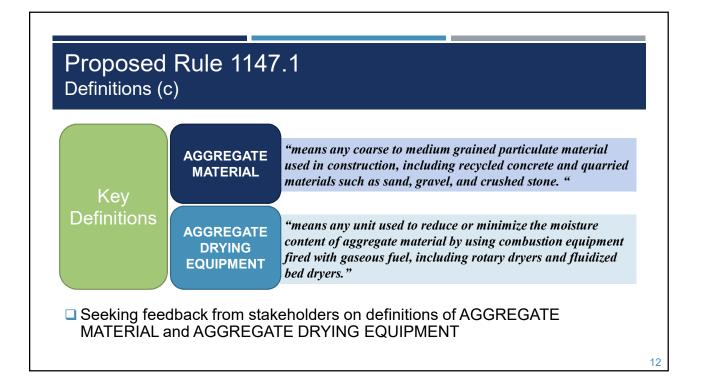
9

### **Comment on CEMS Provision**

- Comment:
  - Operators commented that stack conditions of aggregate drying creates additional challenges for continuous emissions monitoring systems (CEMS)
  - Operators also expressed concerns regarding limited vendors for alternative CEMS (ACEMS)
- □ Staff Response:
  - Staff met with CEMS and ACEMS vendors to discuss long-term feasibility of conventional CEMS as well as ability for vendor to support new facilities opting in for ACEMS
  - CEMS vendor not aware any applications of conventional CEMS for this industry
  - CEMS vendor commented that moisture and particulate that can result in increased maintenance, long-term reliability, and other challenges to properly operate a CEMS for this industry
  - Based on vendor input, staff is not recommending that PR 1147.1 facilities install new CEMS or ACEMS
  - Staff is proposing to remove the CEMS provision from PR 1147.1
    - > Facilities with existing ACEMS will retain systems for the life of the unit and comply with Rule 218 series

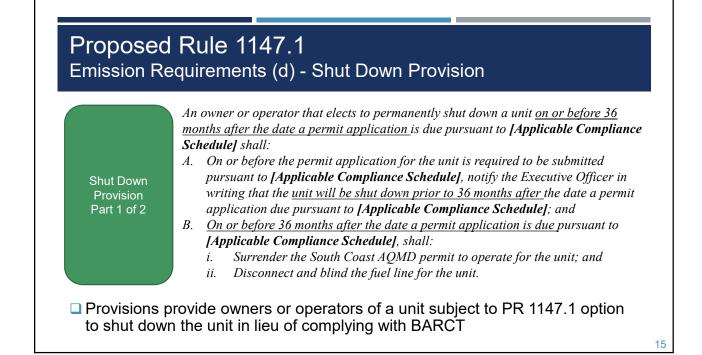


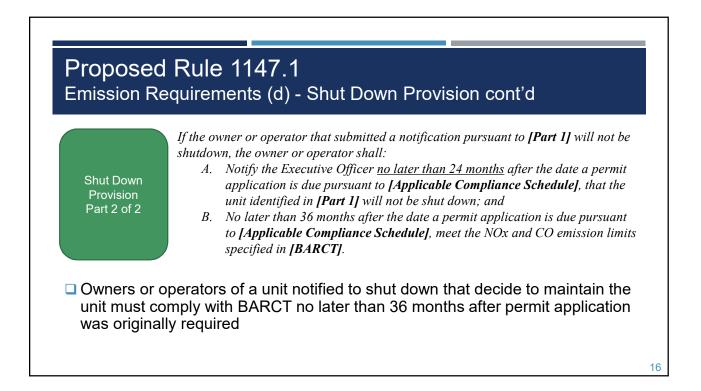




Proposed Rule 1147.7 mission Requirements (d)	- Emission Limits		
Category	Prior to Meeting Proposed NOx and CO Limits	Proposed NOx and CO Emission Limits	
	Emission Limit ( @ 3% O <sub>2</sub> , dry)	Emission Limit ( @ 3% O <sub>2</sub> , dry)	
	NOx	NOx	СО
Non-RECLAIM Facilities	40 ppm	20	000
Former RECLAIM Facilities	102 ppm	30 ppm	800 ppm
<ul> <li>Added limits until units are required</li> <li>Non-RECLAIM units</li> <li>40 ppm based on existing Rule 114</li> <li>RECLAIM units</li> <li>102 ppm NOx based on RECLAIM</li> </ul>	7 requirements	emission lir	nits

Proposed Rule 1147.1 Emission Requirements (d) - Co	ompliance S	chedule	
<ul> <li>Trigger for compliance determined annually on January 1 for units that turn 12 or 32 years old during the 12 months prior</li> <li>Annual cut off of January 1<sup>st</sup> will ensure every facility is provided with a minimum of 6 months to submit permit application</li> <li>Burner age to be determined by date of installation</li> </ul>	Equipment Category	Submit Permit Application	Compliance Date
	Units with Existing Permit Limit ≤40 ppm	By July 1 after the year burner is 32 years old	
	All other units with burners installed prior to 2009	By July 1, 2022	Within 18 months after Permit to Construct is issued
	All other units with burners installed on or after 2009	By July 1 after the year burner is 12 years old	





Proposed Rule 1147.1 Monitoring (e) – Periodic Source Test Provisions				
Equipment Size	Source Testing Schedule			
≥40 MMBtu/hr (Excluding CEMS or Equivalent)	Every 12 Months			
<40 and ≥10 MMBtu/hr	Every 36 Months			
<10 MMBtu/hr	Every 60 Months			
<ul> <li>proposed NOx and CÓ emission limits</li> <li>Source test must follow approved protoco</li> <li>Protocol must be submitted no later than s</li> <li>Source test must be conducted within 90 of Owner or operator with an approved prodemonstrate initial compliance with BAR</li> </ul>	90 days prior to the date of scheduled source test days after protocol approval tocol may request a one time extension of up to 3 months to			





The owner or operator of existing the continuous in-stack emissions monitor or equivalent verification system prior to **[Date of Adoption]** shall retain the system and comply with the requirements specified in Rules 218.2 and 218.3.

The owner or operator of any **[Existing CEMS]** shall use a rolling averaging time of <u>60 minutes corrected to 3% oxygen</u>, dry, to demonstrate compliance with the NOx concentration limits specified in **[PR 1147.1]**.

- PR 1147.1 will not include provision to require new CEMS installations
- Existing units with CEMS or equivalent prior to rule adoption will be required to retain the monitoring system for the life of the equipment
  - Facilities subject to CEMS or equivalent will be required to conduct periodic relative accuracy test audits (RATA) as required by Rule 218.2 and 218.3



CONTACTS			
General RECLAIM Questions	Proposed Amended Rules 1147 and 1100	Proposed Rule 1147.1	Proposed Amended Rules 1147, 1100 and Proposed Rule 1147.2
Susan Nakamura Assistant Deputy Executive Officer 909-396-3105 SNakamura@aqmd.gov	Shawn Wang Air Quality Specialist 909-396-3319 <u>swang@aqmd.gov</u>	Shawn Wang Air Quality Specialist 909-396-3319 <b>swang@aqmd.gov</b> Yanrong Zhu Air Quality Specialist 909-396-3289 <b>yzhu1@aqmd.gov</b>	James McCreary Air Quality Specialist 909-396-2451 jmccreary@aqmd.gov
	Gary Quinn, P.E. Program Supervisor 909-396-3121 gquinn@aqmd.gov		Michael Morris Planning and Rules Manager 909-396-3282 <u>mmorris@aqmd.gov</u>