Proposed Amended Rules

Rule 361: Boilers, Steam Generators, and Process Heaters (Between 2 – 5 MMBtu/hr)

Rule 342: Boilers, Steam Generators, and Process Heaters (5 MMBtu/hr and greater)

Board of Directors
Santa Barbara County
Air Pollution Control District

Our Mission: To protect the people and the environment of Santa Barbara County from the effects of air pollution.

Aeron Arlin Genet Director / APCO

Timothy Mitro, Air Quality Engineer June 20, 2019





Ozone Plan Background

- Santa Barbara County is Nonattainment-Transitional for the state ozone standard.
 - District is required to adopt all feasible measures.
 - The 2016 Ozone Plan has a commitment to amend Rules 361 and 342.
 - NOx reductions from the rule amendments will help attain and maintain the ozone standard.









2016 OZONE PLAN October 2016

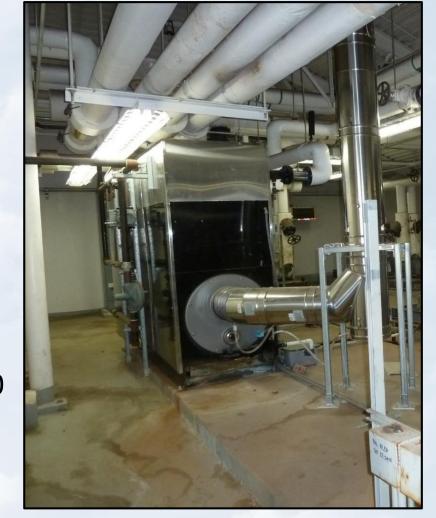
Santa Barbara County Air Pollution Control District 260 North San Antonio Road, Suite A, Santa Barbara, CA 93110 805-961-8800 • www.ourair.org

Aeron Arlin Genet Air Pollution Control Officer



Rule 361 Background

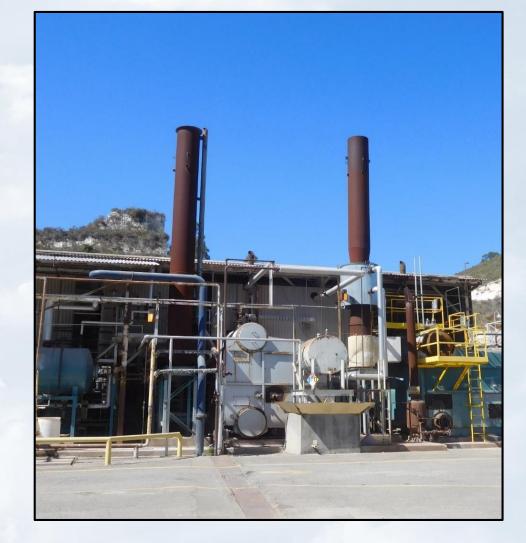
- Adopted in January 2008
- Applies to units rated between 2 5 MMBtu/hr
- Approximately 150 units in the District
 - Located at hospitals, schools, oil & gas facilities
- Current Emission Standards
 - New/Modified units: 30 ppm NOx
 - Existing units: 30 ppm NOx by January 2020





Rule 342 Background

- Adopted in March 1992
- Applies to units rated at 5+ MMBtu/hr
- Approximately 60 units in the District
 - Located at hospitals, oil & gas facilities, and manufacturing facilities
- Current Emission Standards
 - Gaseous fired units: 30 ppm NOx





Proposed Rule Amendments – Ozone Plan

Emission Limits for Units Installed On or After January 1, 2020

Rule #	Rated Heat Input (million Btu/hr)	Fuel Type *	NOx Limit (ppm at 3% O ₂)
361	Between 2 - 5	Natural Gas & Field Gas	9 or 12
342	5 - 20	Natural Gas & Field Gas	9
342	> 20	Natural Gas & Field Gas	7

^{*} Higher limits are allowed for propane, landfill gas, and digester gas.

Emission limits required upon installation – not a retrofit requirement.



Proposed Rule Amendments – Ozone Plan

- Emission Limits are comparable to:
 - South Coast AQMD Rule 1146 & 1146.1
 - San Joaquin Valley APCD Rule 4307 & 4320
 - Ventura County APCD Rule 74.15.1

Adopted in 2008

Adopted in 2008

Adopted in 2015

- Added new definitions
- Updated the Tune-up Procedures
- Reorganized sections and removed obsolete language



Rule Impacts

Emission Reductions

Reduces NOx by approximately 16 tons per year at full implementation.

Cost-Effectiveness

- Includes capital costs, operating costs, and maintenance costs.
- Data Sources:
 - Contacted boiler and burner manufacturers for costs
 - Looked at published cost data from other air districts
 - Reviewed the age and operational loads of affected units
- Ranges from \$12,000 \$20,800 per ton of NOx reduced, depending on the size of the unit.



Proposed Rule Amendments – BARCT



Proposed Rule Amendments – BARCT

- Best Available Retrofit Control Technology (BARCT) requirements apply to each industrial source subject to the state Cap & Trade program.
 - As of January 1, 2017, facilities that emitted greater than 25,000 metric tons of greenhouse gases (GHGs).
- AB 617 BARCT prioritizes permitted units that have not been modified for the greatest period of time.
- Rules 361 and 342 were identified on the District's BARCT rule development schedule, as adopted in Dec. 2018.



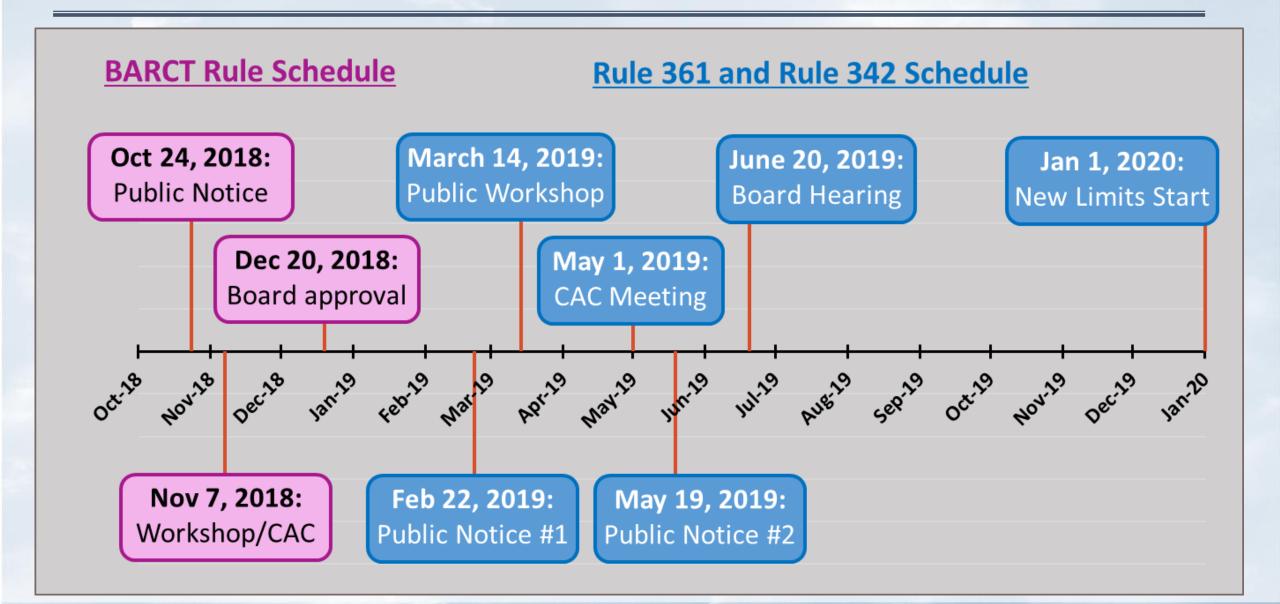
Proposed Rule Amendments – BARCT

- Rule 361 BARCT: Proposed revisions require BARCT (9 or 12 ppm NOx) no later than 1 year after rule adoption. [June 2020]
 - Affects 4 permitted units, located at: Imerys & ERG

- Rule 342 BARCT: Proposed revisions require BARCT (9 or 7 ppm NOx) no later than December 31, 2023.
 - Affects 4 permitted units, located at: Imerys & Exxon Mobil
 - 6 units already comply with BARCT: ERG & PCEC
 - Separate BARCT for CO₂ dosing process: Windset Farms



Timeline



Public Review Process

- CARB & EPA Review: No comments
- Rule Workshop: Attended by VAFB, HVI Cat Canyon, ERG Resources, Exxon Mobil, Windset Farms, City of Santa Maria, and County of Santa Barbara
- Public Comments: Windset comments incorporated into Rule 342 BARCT analysis
- CAC Review & Meeting: CAC recommended approval of the rule amendments
- Post-CAC Meeting:
 - Reformulations of words to say the equivalent of the same thing as had been circulated to the public
 - ERG comment about Rule 361 BARCT cost-effectiveness



Staff Recommendation

- Hold a public hearing to receive testimony on the proposed amendments to Rules 361 and 342
- Adopt the Board Resolution for Rules 361 and 342
 - Adopt the CEQA Findings
 - Adopt the Health & Safety Code General Rule Findings
 - Adopt the amendments to Rules 361 and 342



Contact Information

Timothy Mitro

Air Quality Engineer

805-961-8883

mitrot@sbcapcd.org

