ASSEMBLY BILL 617: BARCT ANALYSIS - PARTICULATE MATTER CONTROL DEVICES

Community Advisory Council
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
April 27, 2022
PRESENTATION TOPICS

1) Review April 2021 Workshop and Background Information
   o Assembly Bill 617 – Best Available Retrofit Control Technology (BARCT)
   o Imerys Filtration Minerals, Inc.
   o BARCT Analysis – Draft Rule 363

2) Post-Workshop concerns regarding the BARCT Analysis

3) BARCT Implementation Methods & Timeline
   o Authority to Construct permit application to implement BARCT
Enacted in 2017 for Community Air Protection.
BARCT requires the maximum degree of emission reductions, taking into account environmental and economic impacts.
BARCT applies to large industrial sources subject to Cap-and-Trade (>25,000 metric tons/yr of GHGs as of 1/1/2017).
Diatomaceous earth powders are used as filtration aids and various other industrial uses.

- Imerys mines, crushes, conveys, dries, and bags the diatomaceous earth.
- Uses over 60 different PM Control Devices.
Draft Rule 363 incorporated standards from South Coast AQMD Rule 1155.

BARCT Analysis – PM Control Devices

1) **All Units:** No Visible Emissions
2) **Smaller Units:** Weekly Observations – EPA Method 22
3) **Large Baghouses:** BARCT Emission Rate, Source Tests, and Bag Leak Detection Systems (BLDS)

**CAC motion:** District staff to work with Imerys to resolve the concerns.
Open-sock Baghouses:

- **Equipment Issue:** Baghouses cannot be equipped with a Bag Leak Detection System (BLDS) or source tested per EPA test methods.

- **Resolution:** Remove all four open-sock baghouses from service.
  - Two of the baghouses haven’t operated for 10+ years.
  - Exhaust from the remaining two open-sock baghouses will be rerouted to an existing enclosed baghouse.
POST-WORKSHOP MEETINGS

Weekly Method 22 Observations:

- **Imerys concern**: Observations take time and do not provide much benefit.
- **District position**: Observations are necessary to meet BARCT enforceability standards.
- **Resolution**:
  1) Commit to perform weekly Method 22 observations.
  2) Explore feasibility of installing additional BLDS in lieu of weekly observations.
BARCT IMPLEMENTATION

- Imerys submitted an Authority to Construct (ATC) application to incorporate BARCT directly into their operating permit.
  - Requires full BARCT implementation no later than December 31, 2023.

- Draft Rule 363 – PM Control Devices is no longer necessary.
  - The BARCT Analysis will be presented to the Board.
  - The BARCT Analysis will continue to apply to existing and new equipment units at the AB 617 Industrial Sources.
  - The BARCT Analysis will be forwarded to the California Air Resources Board.

- Staff believes this is an effective approach to satisfy the AB 617 mandate.
BARCT TIMELINE FOR PM CONTROL DEVICES

- **Dec 2018:** BARCT Schedule adopted by District Board
- **Fall 2020:** Draft Rule & Staff Report for PM Control Devices sent to Industry
- **April 2021:** Joint Workshop/CAC Meeting
- **Post-Workshop:** Meetings with Industry to discuss BARCT & Authority to Construct
- **April 2022:** CAC Meeting to receive update on BARCT Analysis
- **June 2022:** District Board Hearing to receive BARCT Analysis (tentative)
- **Dec 31, 2023:** Full implementation of BARCT Analysis
CONTACT INFORMATION

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