



air pollution control district  
SANTA BARBARA COUNTY

# 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

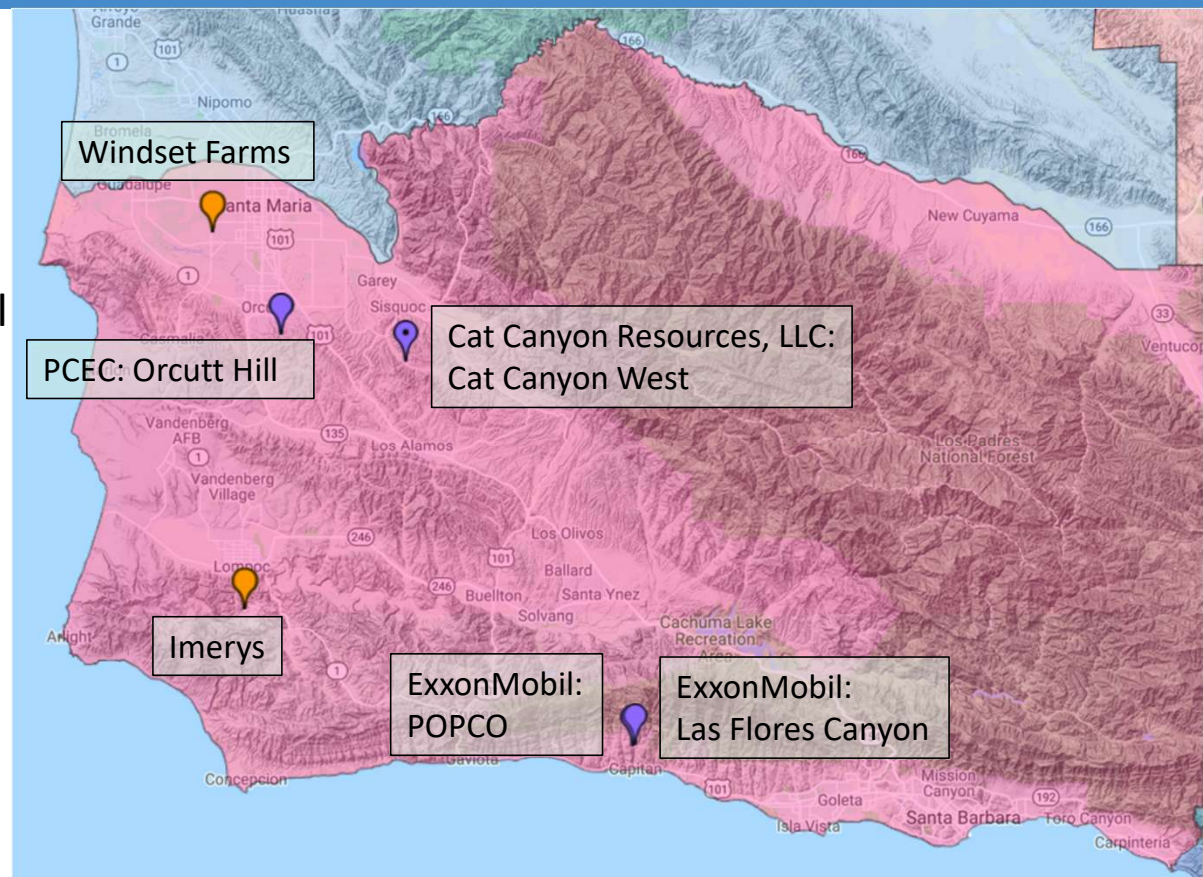
- 1) Review April 2021 Workshop and Background Information
  - Assembly Bill 617 – Best Available Retrofit Control Technology (BARCT)
  - Imerys Filtration Minerals, Inc.
  - BARCT Analysis – Draft Rule 363
- 2) Post-Workshop concerns regarding the BARCT Analysis
- 3) BARCT Implementation Methods & Timeline
  - Authority to Construct permit application to implement BARCT



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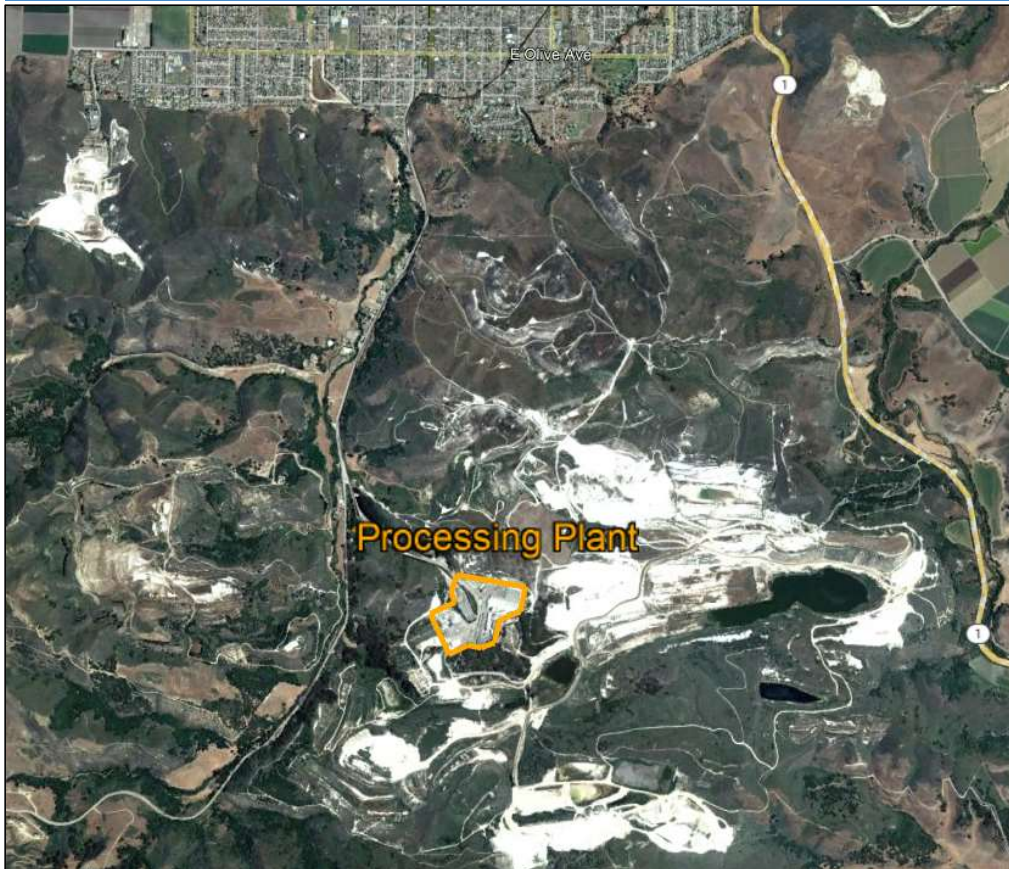
# BACKGROUND: ASSEMBLY BILL (AB) 617

- 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).
- Rule Development Schedule adopted by Board in 2018.





# BACKGROUND: IMERYYS



- Diatomaceous earth powders are used as filtration aids and various other industrial uses.



**Diatomaceous Earth**

- Imerys mines, crushes, conveys, dries, and bags the diatomaceous earth.
- Uses over 60 different PM Control Devices.

# DRAFT RULE 363 – BARCT ANALYSIS

- 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.



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# POST-WORKSHOP MEETINGS

## 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.



**Example of a Small Open-sock 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.



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# 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



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# CONTACT INFORMATION

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