



MEMORANDUM

DATE: April 18, 2022

TO: Community Advisory Council (CAC) Members

FROM: Timothy Mitro, (805) 979-8329, MitroT@sbcapcd.org

SUBJECT: Update on the AB 617 BARCT Analysis for Particulate Matter (PM) Control Devices

Background

At the April 2021 Joint Workshop/CAC meeting, staff presented information regarding draft Rule 363, Particulate Matter (PM) Control Devices. Draft Rule 363 was created to satisfy the Best Available Retrofit Control Technology (BARCT) requirements for units that are part of an “Assembly Bill (AB) 617 industrial source.” The rule would be applicable to all six AB 617 industrial sources within Santa Barbara County, but only one facility currently uses PM control devices: Imerys Filtration Minerals, Inc (Imerys). Imerys is a diatomaceous earth processing facility in Lompoc that has over 60 different PM control devices. At the April 2021 CAC meeting, the CAC recommended that District staff continues to work with Imerys to resolve the concerns raised at the meeting.

Draft Rule 363 would have required the source to comply with the following BARCT requirements to reduce PM emissions from the facility:

- Large baghouses would be required to use a Bag Leak Detection System (BLDS) and be source tested to demonstrate compliance with the emission limits in the rule.
- Weekly EPA Method 22 visible emission observations on air pollution control equipment, such as baghouses and cyclones, to make sure that they are properly maintained and not venting excessive PM emissions.

These performance standards will lead to early detection and repair of the PM control devices, which will decrease the frequency of unexpected upsets or bag ruptures and reduce the amount of particulate matter emitted. The standards are based on South Coast Air Quality Management District Rule 1155, which was initially adopted in December 2009.

Discussion

Since the rule development workshop and CAC meeting in April 2021, staff met with representatives of Imerys on multiple occasions to determine how the facility can meet the BARCT requirements for PM control devices. The conversations surrounded two main topics, which are discussed more below:

- 1) The open-sock baghouses were discussed because these units would be considered large (Tier 2) baghouses under draft Rule 363, but their configuration does not allow them to be equipped with a BLDS or to be source tested per EPA test methods. As part of the discussions, Imerys proposed to remove all four open-sock baghouses from service. These baghouses are over 50 years old, and newer, more efficient baghouse designs are now available to control PM emissions. Two of the open-sock baghouses haven't operated for more than a decade. The exhaust streams that were routed to the other two remaining open-sock baghouses will be rerouted to an existing enclosed baghouse.
- 2) The BARCT requirement to conduct weekly Method 22 observations was also discussed during these meetings. Imerys already performs daily checks and quarterly checks of their equipment in accordance with their District-issued federal Title V Permit to Operate. However, the daily checks do not follow the procedural requirements in EPA Method 22. The District affirmed that weekly Method 22 observations would still be necessary to meet BARCT requirements to ensure early PM leaks are detected and repaired as expeditiously as possible.

As a result of these discussions, Imerys proposed to install additional BLDS units on most of their PM Control Devices to satisfy the BARCT requirements. If BLDS units are utilized, the Method 22 observations are no longer required. Although Imerys' proposal will result in higher initial capital costs, it will reduce the on-going costs associated with the daily, weekly, and quarterly visual observations.

As mentioned in the March 2022 CAC update, Imerys submitted an Authority to Construct application to remove the four open-sock baghouses from service and retrofit the remaining PM control devices to comply with the BARCT standards. The Authority to Construct permit application was deemed complete on April 18, 2022, and, once it is issued, the Authority to Construct permit will require all modifications described in the permit application to be implemented at the facility no later than December 31, 2023. This will ensure that the BARCT requirements are implemented prior to the mandated deadline in AB 617. Any device that fails to meet the BARCT standards on December 31, 2023, will need to be removed from service and may not be operated until the necessary modifications are complete.

Since all BARCT requirements will be incorporated directly into Imerys' operating permit and the remaining five AB 617 industrial sources in Santa Barbara County do not currently use PM control devices, Staff affirms that it is no longer necessary to adopt a rule. Staff proposes to bring a completed BARCT analysis before the District Board of Directors to finalize this assessment. Once finalized, the BARCT analysis will continue to apply to Imerys' existing equipment units as well as any new units permitted and installed in the future at any of the AB 617 industrial sources to ensure that the PM emissions are effectively controlled. In addition, the BARCT analysis will be forwarded to the California Air Resources Board for inclusion into their AB 617 BARCT webpage (ww2.arb.ca.gov/expedited-barct). Staff worked with District Counsel and concludes that this approach effectively satisfies the AB 617 mandate because it accomplishes the emission reduction goals of the legislation.

For the CAC meeting on April 27, 2022, staff will provide a presentation on the key points of the BARCT assessment and Imerys' request to comply with the standards through enforceable permit conditions. This agenda item will be informational only (i.e., no formal CAC

recommendation will be sought). The previously docketed materials for draft Rule 363 are still available for review from the District's website, www.ourair.org/rules-under-development, and all six AB 617 industrial sources have been noticed about this meeting. If there are questions or concerns that you would like to discuss prior to the meeting, please contact me at (805) 979-8329 / e-mail: MitroT@sbcapcd.org.