ASSEMBLY BILL 617: BARCT ANALYSIS - PARTICULATE MATTER CONTROL DEVICES

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 16, 2022
Enacted in 2017 for Community Air Protection.

BARCT applies to large industrial sources subject to Cap-and-Trade (>25,000 metric tons/yr of GHGs as of 1/1/2017).

BARCT: The maximum degree of emission reductions, taking into account environmental and economic impacts.

BACKGROUND: BAGHOUSES

- Used in various industries such as concrete batch plants, asphalt plants, & metal grinding.
- Baghouses use filter media to capture PM emissions.
- Bag Leak Detection Systems (BLDS) can be used to monitor and detect bag leaks.

Exterior Housing & Ducting

Interior Bag Filters
BARCT ANALYSIS

- BARCT Analysis incorporates standards from South Coast AQMD Rule 1155.

- **BARCT Analysis – PM Control Devices**
  1) **Large Baghouses:** BARCT Emission Rate of 0.005 gr/dscf, Source Tests, and BLDS for continuous monitoring
  2) **Smaller Units:** Weekly Visible Emission Observations – EPA Method 22
BARCT IMPLEMENTATION & IMPACTS

- BARCT Analysis primarily affects Imerys, a diatomaceous earth mine south of Lompoc.
  - Requirements initially written into Draft Rule 363.
  - Authority to Construct (ATC) permit incorporates BARCT directly into Imerys’ operating permit.

- Emission Impacts
  - Removal of antiquated baghouses.
  - Additional monitoring (BLDS + EPA Method 22) will lead to early detection and repair of equipment.

- Estimated Industry Costs
  - Capital Costs for Modernization Efforts: $970,000
  - On-Going Costs for Monitoring: $52,000 per year
BARCT ANALYSIS TIMELINE

- **Dec 20, 2018:** Board Adopted BARCT Schedule
- **Fall 2020:** Industry Review
- **Post-Workshop:** Industry Meetings
- **June 16, 2022:** Board Hearing
- **Dec 31, 2023:** Full Implementation
- **April 28, 2021:** Workshop & CAC
- **April 27, 2022:** CAC Meeting
RECOMMENDATION

- Rule development proceeding for Particulate Matter Control Devices is no longer necessary.
  - Emission reduction goals of AB 617 satisfied through the ATC permit process.
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