

PROPOSED AMENDED RULE 1147



April 20, 2017

Task Force Meeting

Overview Proposed Amended Rule 1147

- Addresses findings from Final Rule 1147 Technology Assessment
- Relaxation of some requirements for new and in-use equipment
- Staff worked with stakeholders and incorporated some revisions that go beyond recommendations from Final Rule 1147 Technology Assessment

Discussions with Stakeholders Since Last Task Force Meeting

- Site visit and discussion with owners at Handbill Printers and industry association representatives
- Site visit to Industrial Process Equipment, Inc. a manufacturer of heated process tanks and large conveyORIZED pressure washer systems
- Site visit to Powder Coat Services a metal finishing company that uses conveyORIZED pressure washers
- Discussions with representatives of a chemical processing plant seeking clarification of a rule exemption
- Discussion with various stakeholders on the exemption of new food ovens from Rule 1147

Provisions for Units Less than 1 Pound/Day NO_x

- Relieve in-use units <1 pound/day from compliance limits that become effective 7/1/2017
- Require units to meet emission limits if the burner or the unit is replaced
 - New burners and units are available that can meet NO_x emission limits
- Change equipment age compliance date to 30 years
- Clearly defined alternative paths to demonstrate compliance (fuel use or burner hours of operation)
- Remove compliance requirement for small units when a facility relocates

NOx Limits for Certain Equipment Categories

- Increase the NOx limit from 30 to 60 ppm for the following equipment categories
 - Afterburners, incinerators, and burn-off ovens
- Revisions are consistent with findings from Final Rule 1147 Technology Assessment which includes recommendations from stakeholders, ETS, and SCAQMD staff

Provisions for Units <325,000 BTU/hour

- Based on comments received at Stationary Source Committee, added provision for units <325,000 BTU/hour
 - New or existing in-use units are not required to meet NOx emission limit
- Based on typical hours of operation and emissions, these units would not exceed 1 pound/day of NOx emissions

Changes Based on Stakeholder Comments

- Added provisions to address specific issues raised by stakeholders:
 - Change emission limit for burn-off ovens, incinerators and afterburners
 - Exempt existing in-use pressure washers and tanks
 - Small or low emission unit exemption for facility relocation (consistent with NSR and BACT)
- Added testing exemption for infrared burners
- Additional changes under consideration:
 - Additional testing option for low temperature ovens
 - Small unit option to use vendor guarantees (e.g., 2 mm Btu/hour or smaller)

Emissions Reductions

- Overall delay in emission reductions of about 0.9 tons per day (removing in-use requirement for units < 1 pound/day)
 - Affecting approximately 4,900 to 5,600 pieces of equipment
- Emission reductions foregone is < 0.05 tons per day

Schedule

- Stationary Source Committee April 21, 2017
- Draft Subsequent Environmental Assessment comment period – March 24, 2017 to May 9, 2017
- Set Public Hearing May 5, 2017
- Public Hearing – June 2, 2017