

**BAY AREA  
'97 CLEAN AIR PLAN**

*Volume V*

**APPENDIX H**

**Description of Adopted  
Stationary and Mobile Source  
Control Measures**



**adopted by the Board of Directors  
December 17, 1997**

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## APPENDIX H

### ADOPTED STATIONARY AND MOBILE SOURCE CONTROL MEASURE DESCRIPTIONS

#### Introduction

This appendix contains descriptions of control measures that have been fully adopted, or those for which a decision has been made that the District will not implement the control measure. Such a decision could be made on the basis of technical feasibility, insufficient emissions reduction potential, or cost effectiveness of the previously-proposed control measure. The District is required by State law to implement "all feasible measures." As stated in Appendix A of this CAP, "feasible measures are those measures which are: (1) reasonable and necessary for the San Francisco Bay Area; (2) capable of being implemented in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors; and (3) approved or approvable by the California Air Resources Board, based upon State law and ARB policies."

Each control measure in this appendix contains, under the title, an adoption or implementation date or a brief statement of the reason for non-adoption or non-implementation. For each measure adopted into a rule, District staff reports and, in some cases where necessary to comply with federal law, State Implementation Plan (SIP) submittals, contain information about the development of the control measure, including refinements of inventory estimates and emission reductions expected from the measure. To preserve the historical record of the development of the control measure, the description of the measures listed in this appendix have not been amended to match current inventory or emission reduction estimates. For each control measure or portion of a control measure not implemented, staff reports or technical assessment memoranda explain the reasons for not proceeding to the rule adoption stage.

For a description of the types of information compiled for each control measure, consult the introduction to Appendix F: Stationary and Mobile Source Control Measure Descriptions.

#### **CM A4: IMPROVED WOOD FURNITURE AND CABINET COATINGS RULE**

*Adopted April 17, 1991*

#### **Background**

This control measure would reduce ROG emissions from wood furniture and cabinet coating operations by imposing VOC limits on the coatings used in the industry, and by deleting the small user exemption which currently exists.

The variety of coatings used by the industry includes fillers, sealers, primers, stains, lacquers, topcoats, and washcoats. These coatings are used to manufacture items such as kitchen and bathroom cabinets, tables, chairs, beds, sofas, shutters, and art objects.

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There may be as many as one thousand facilities in the District that would be subject to this control measure.

## Regulatory History

The District regulates precursor organic emissions from the wood furniture and cabinet coating industry under Regulation 8, Rule 32, which was adopted in 1983. Currently, Rule 8-32 does not have VOC limits for coatings, but does have a transfer efficiency requirement. Section 301 specifies the type of spraying equipment that is allowed under the Rule. (There are no specific transfer efficiency percentage requirements.) Essentially, any spraying technique except conventional air atomization is allowed under Rule 8-32. In addition, Section 110 exempts facilities with an annual coating usage of less than 500 gallons.

In 1988, the South Coast AQMD expanded their Rule 1136 to cover all wood products, not just furniture and cabinets. This revision also established interim and final VOC standards through July 1, 1996 for the following major coating categories: clear topcoat, filler, high solid stain, ink, mold-seal coating, multi-colored coating, pigmented coating, sealer, stripper, low solid stain, and toner or washcoat.

## Emissions Subject to Control

The affected source categories are *wood furniture and cabinet coating and cleanup*. The emissions subject to control are given below.

<u>Year</u>	<u>Emissions Subject to Control (TPD, Summer)</u>
1994	6.86
1997	7.67
2000	7.95

## Proposed Method of Control

Coating reformulation is expected to be the predominant method of meeting VOC standards. However, successful reformulation has progressed slowly due to various technical difficulties associated with developing coatings for wood substrates. For example, water-based formulations may cause the wood grain to rise, while high solid formulations sometimes do not give desirable appearances.

Data collected by the South Coast AQMD during their rule development process indicates that industry is beginning to use low VOC coatings. Emerging technologies such as UV-curable coatings are being developed, and technology transfer, such as powder coatings, may also result in acceptable products. For most wood coatings, VOC limits of 275 grams per liter are believed to be achievable.

## Emission Reductions Expected

In order to address uncertainty in the emission reductions that will result from implementing this control measure, low and high estimates were made. The VOC limits are anticipated to be phased in with gradually more stringent standards over time. Emissions from coatings use are expected to ultimately be reduced by 80 to 90 percent. Emissions from cleanup solvent use were assumed to be reduced by 25 to 30 percent.

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The estimates below show the range of emission reductions achievable if the measure could be fully implemented in the corresponding year.

	<b>EMISSION REDUCTIONS</b>	
<i>Year</i>	<i>Low (TPD, Summer)</i>	<i>High (TPD, Summer)</i>
1994	5.18	5.84
1997	5.79	6.52
2000	6.00	6.77

## **Costs of Control**

A cost-effectiveness of \$2000 per ton reduced was assumed, based on cost estimates used in the past for coating reformulation. This figure is significantly higher than the South Coast AQMD's cost estimates published for their amended rule in 1988, which range from a savings of over \$300 per ton reduced to costs of about \$200 per ton reduced. It is believed that the \$2000 per ton reduced cost estimate is more appropriate considering the technical difficulties involved in wood coatings reformulation.

## **Other Impacts**

No significant adverse environmental impacts are expected as a result of this control measure. As waterborne technology in coatings increases, environmental benefits will result from the reduction in solvent waste generated in manufacturing and user cleanup. There is the possibility of an increase in emissions of stratospheric ozone depleting substances (such as 1,1,1 trichloroethane) and potentially toxic substances (such as methylene chloride) if coatings are reformulated with non-precursor ("exempt") solvents. The District may not, however, allow these types of solvent substitutions.

## **References**

South Coast Air Quality Management District, Supplemental Staff Report, Proposed Amended Rule 1136 - Wood Products Coating, July 5, 1988.

## **CM A10: IMPROVED GENERAL SOLVENT AND SURFACE COATING RULE**

*Part (a) Adopted May 15, 1996*

*Part (b) Adopted June 1, 1994*

## **Background**

This control measure would reduce ROG emissions from general surface coating operations by encouraging the use of low VOC coatings and/or by establishing facility-wide emission limits for subject coating operations.

General surface coating refers to those coating operations which are exempted from or which are otherwise not subject to source-specific requirements. The standards for general coating operations do

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not expressly limit the VOC content of coatings, and therefore are generally less stringent than those affected by source-specific requirements.

There are less than 300 facilities in the District that have coating operations for which no source-specific requirements exist and therefore which are subject to general coating standards. Many more facilities have some coating subject to the general requirements because of specific exemptions from other coating rules (e.g. solid film lubricants, adhesives and stencil coatings).

## Regulatory History

The District has approximately 46 rules designed to reduce precursor organic emissions from specific source categories. Many of these rules have exemptions for certain types of operations. Any coating source that is exempted from a source-specific rule then becomes subject to the general coating rule of Regulation 8, Rule 4. In addition, any operation for which no specific rule exists also is subject to Rule 8-4.

Rule 8-4 was the first major VOC rule adopted by the District, and it was designed to limit emissions of the more photochemically reactive organic compounds. The Rule contains definitions of "complying" and "non-complying" solvents and surface coatings which are based on the amount of specific types of organic compounds which are present in the solvent or coating. The VOC emissions from sources that use non-complying coatings are limited to 40 lb/day, while sources which use complying coatings may emit up to 3000 lb/day.

In many instances, coatings with relatively high VOC content are allowed under Rule 8-4. Conversely, there are cases where a low VOC content coating may be acceptable for a given coating application, but is not allowed because it contains a particular organic compound in excess of the "complying" level. In this case, the Rule may require a company to use a higher VOC content coating that meets the "complying" definition.

## Emissions Subject to Control

The affected source categories are *other industrial/commercial coating*, and *other organics -- evaporation*; only a portion of the total emissions in these categories were assumed to be affected. The projected emissions subject to control are given below.

<u>Year</u>	<u>Emissions Subject to Control (TPD, Summer)</u>
1994	1.20
1997	1.26
2000	1.30

## Proposed Method of Control

This control measure proposes to reduce precursor organic emissions from general surface coating operations by (1) allowing the use of low VOC coatings as an alternative to "complying" coatings, or by redefining "complying" coatings using a reasonable VOC limit (e.g. 420 gram/liter VOC limit) rather than a solvent composition definition, and/or (2) adding standards for facility-wide caps for coating operations subject to Rule 8-4.

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Because of the low VOC standards of other District rules, there are already a wide variety of surface coatings available with VOC contents less than 420 grams per liter. It is anticipated that acceptable low VOC coatings will be available for many coating applications affected by this control measure.

Another option for reducing emissions from general coating sources would be to replace the emission limits for individual operations with a facility-wide cap on emissions from general surface coatings. The existing emission limits in Rule 8-4 are expressed in terms of the allowable emissions from individual operations. For most facilities, these limits are not very restrictive (particularly for complying coatings), and therefore offer little incentive for companies to reduce emissions. A facility-wide cap would encourage facilities to seek means to reduce overall VOC emissions from affected sources. Emission limits could be met by using low VOC coatings, higher transfer efficiency application methods, or add-on controls.

### **Emission Reductions Expected**

In order to address uncertainty in the emission reductions that will result from implementing this control measure, low and high estimates were made. This control measure was assumed to reduce ROG emissions from coatings usage by 20 to 30 percent.

The estimates below show the range of emission reductions achievable if the measure could be fully implemented in the corresponding year.

	<b>EMISSION REDUCTIONS</b>	
<i>Year</i>	<i>Low (TPD, Summer)</i>	<i>High (TPD, Summer)</i>
1994	.24	.36
1997	.25	.38
2000	.26	.39

### **Costs of Controls**

If facilities are given the option of using low VOC coatings or complying with the existing requirements, it is assumed that low VOC coatings would be used only where a cost savings would result. If the definition of a "complying" coating is modified to be expressed in terms of VOC content, some facilities would need to reformulate their coatings. The costs of coating reformulation are usually offset somewhat by a reduction in volumetric coating usage (for higher solids coatings). A cost-effectiveness of \$2000 per ton reduced is assumed, based on cost estimates used in the past for coating reformulation.

The costs associated with a facility-wide cap on general solvent emissions would depend on the source types, the amount of emissions relative to the cap limit, and the type of control necessary to reduce emission below the cap level. Given the variety of industrial sources subject to the general solvent and surface coating rule, it is not possible to calculate a meaningful overall cost-effectiveness number at this time.

### **Other Impacts**

No significant adverse environmental impacts are expected as a result of this control measure. As waterborne technology in coatings increases, environmental benefits will result from the reduction in solvent waste generated in manufacturing and user cleanup. There is the possibility of an increase in emissions of stratospheric ozone depleting substances (such as 1,1,1 trichloroethane) and potentially

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toxic substances (such as methylene chloride) if coatings are reformulated with non-precursor ("exempt") solvents. The District may not, however, allow these types of solvent substitutions.

## References

None.

## CM A11: FURTHER CONTROL OF EMISSIONS FROM ADHESIVES USE

*Part (a) Adopted November 18, 1992*

*Part (b, c) not adopted, not technically achievable at this time*

### Background

This control measure would reduce ROG emissions by establishing a specific rule for adhesives use that would limit the VOC content of adhesives, require the use of high transfer efficiency application methods, and limit the emissions from cleanup solvent.

Adhesives are used in a wide variety of industrial applications. Adhesives such as glue, mucilage, paste, and rubber cement are used to bind similar and dissimilar materials (e.g. glass, plastic, rubber, wood, and metal) together. These types of adhesives work when the surfaces of the materials adhere to the adhesive and it is the strength of the surface adhesion and the material strength of the adhesive which holds the two materials together. Other types of adhesives, such as cement, dissolve the surfaces of the substrates, and with the aid of solid ingredients, fuse and chemically bond the surfaces together.

Some of the different types of adhesives are contact adhesives, heat cured adhesives, hot-melt, UV-cured, elastomeric, epoxy, pressure sensitive, anaerobic, aerobic, catalyzed-cured, RF-cured, solvent cements, plastic cements, weld solvents, high frequency cured, and vinyl adhesives. Adhesives can be applied by a variety of methods, including brush, roller, flow, spraying, hot-melt, and laying of adhesive sheets.

Organic solvent-borne adhesives are the main source of ROG emissions in this source category. Solvents are the media for transferring the adhesive materials to the substrates, and must be capable of dissolving all of the various adhesive components. The solvents must have the ability to wet the substrate, to promote adhesion, and to have a viscosity which allows for uniform application of the adhesive. For most adhesives, VOC emissions occur from evaporation of the solvent before bonding.

There are probably thousands of companies located within the District that use some type of adhesives that would be affected by this control measure.

### Regulatory History

The District does not currently have a rule specific to adhesive applications. Most source-specific rules exempt adhesives and, therefore, adhesive applications usually default to Rule 8-4, General Solvent and Surface Coating Operations. Rule 8-4 limits daily emissions from general sources, but does not contain specific VOC limits for coatings.

The South Coast AQMD has adopted a rule specific to adhesive applications (SCAQMD Rule 1168). The general VOC limit in this Rule, which became effective on January 1, 1991, is 250 grams per liter. SCAQMD Rule 1168 also has other special VOC limits for certain types of adhesives or types of substrates being bonded.

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## Emissions Subject to Control

The affected source categories are *adhesives and sealants, solvent base*. The majority of the emission reductions from this control measure will come from establishing VOC limits, which are anticipated to become effective in the year 1995. The projected emissions subject to control are given below.

<u>Year</u>	<u>Emissions Subject to Control (TPD, Summer)</u>
1994	2.24
1997	2.39
2000	2.49

## Proposed Method of Control

To control ROG emissions from adhesive applications, a new District rule similar to the existing SCAQMD Rule 1168 is proposed. A general VOC limit for adhesives of 250 grams per liter is proposed. In addition, requirements for increased transfer efficiency and closed systems for cleanup solvents are anticipated.

The primary means of complying with the VOC limit will be reformulation. Low VOC adhesive formulations include water-base, hot-melt (solventless), high solids, and polymerizing adhesives.

*Water-base:* Water-base adhesives use water to replace some or all of the organic solvents in the mixture. Water-base adhesives may dry more slowly than solvent-base and therefore may decrease production rates. Adhesive applicators may be able to compensate for this, however, by installing drying ovens.

*Hot-Melt:* Hot-melt adhesives contain no organic solvent and therefore, produce no VOC emissions. These materials are solid at room temperature and are applied using heat to melt the adhesive. However, hot-melt adhesives set up very quickly, are not flexible, and may require some modification to the manufacturing process in order to be used.

*High Solids:* High solids adhesives contain a higher ratio of solids to solvent than do conventional adhesives. This reduces VOC emissions because an adhesive applicator can use less product to apply a given amount of adhesive solids. The disadvantage of high solids adhesives is that they may be too viscous to apply in a uniform layer.

*Polymerizing Adhesives:* Polymerizing adhesives, which contain no VOC, are liquid at application and become solid when cured. These adhesives may require the installation of a UV-lamp or the introduction of a chemical free radical initiator to begin the polymerization reaction. These materials have better penetration than hot-melt adhesives, but have limited flexibility.

High transfer efficiency application methods such as electrostatic and high volume -- low pressure sprayers, roll coaters, and hand applicators can be used with adhesives to reduce the amount of material used. In some cases with high viscosity adhesives, conventional application methods such as air-atomized or airless spraying can be used with good results. Heating may also be used to improve transfer efficiency.

This control measure is also directed at reducing cleanup solvent emissions from the use of adhesives. To comply with such a provision, equipment can be cleaned in a container that is kept closed except when in use. Spray guns can be cleaned so that solvent is collected in an enclosed container. Used solvents may be recycled in an on-site distillation unit, or reclaimed by a dedicated recycling facility.

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## Emission Reductions Expected

In order to address uncertainty in the emission reductions that will result from implementing this control measure, low and high estimates were made. This control measure was assumed to reduce ROG emissions from adhesives use by 70 to 80 percent.

The estimates below show the range of emission reductions achievable if the measure could be fully implemented in the corresponding year.

	<b>EMISSION REDUCTIONS</b>	
<i>Year</i>	<i>Low (TPD, Summer)</i>	<i>High (TPD, Summer)</i>
1994	1.57	1.79
1997	1.67	1.91
2000	1.74	1.99

## Costs of Controls

The costs of complying with this control measure are divided into three parts: the cost of reformulation, the cost of high transfer efficiency application, and the cost of meeting cleanup solvent requirements. All cost estimates are taken from the South Coast AQMD's staff report for Rule 1168, dated March 29, 1989.

The costs of using low VOC adhesive formulations will vary depending on the adhesive technology and the application technique. The range of material costs will vary from a savings of \$534 per ton reduced to costs of \$5447 per ton reduced, with an average cost of \$2000 per ton of VOC reduced. Water-base adhesives may be more expensive to implement because their increased drying time may decrease production rates or require the addition of drying ovens.

The cost of high transfer efficiency application methods will depend on the type of equipment used. The South Coast AQMD estimated the cost of using high volume, low pressure sprayers to be approximately \$2,000 per ton of VOC emissions reduced.

The cost of complying with the cleanup solvent requirements by using a closed equipment cleaning system is estimated to be a savings of \$64 per ton of emissions reduced. The cost of using low VOC cleanup solvents will vary depending on formulation. Exempt-solvent and water-base formulations are expected to cost about \$2 and \$1 more per gallon, respectively, than conventional cleanup solvents.

## Other Impacts

Transfer efficiency is a measure of coating (adhesive) waste. A higher transfer efficiency will result in less coating used per application and, therefore, less coating waste.

As waterborne technology in adhesives increases, environmental benefits will result from the reduction in solvent waste generated in manufacturing and user cleanup. There is the possibility of an increase in emissions of stratospheric ozone depleting substances (such as 1,1,1 trichloroethane) and potentially toxic substances (such as methylene chloride) if adhesives are reformulated with non-precursor ("exempt") solvents. The District may not, however, allow these types of solvent substitutions.

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## References

South Coast Air Quality Management District, Staff Report, Proposed Rule 1168, Control of Volatile Organic Compound Emissions from Adhesive Applications, March 29, 1989.

## CM A12: ELIMINATION OF COATING RULES ALTERNATIVE EMISSION CONTROL PLANS

*Eliminated from consideration due to lack of emission reductions*

### Background

This control measure would reduce ROG emissions by removing Alternative Emission Control Plan (AECP) provisions from applicable District surface coating rules.

AECPs provide facilities with increased flexibility in achieving overall emission reductions. Under an AECP, some individual sources are allowed to emit more than the applicable standards, provided that the excess emissions are offset by controlling other sources beyond what the standards require.

AECPs rely on the transfer of "emission credits" between affected sources. Eliminating AECPs should reduce emissions by requiring each source or coating to meet applicable standards. The emission reductions from sources or coatings which "over-comply" could no longer be used to allow the use of non-complying sources or coatings. In addition, due to the complexity of verifying compliance under an AECP, the proposed control measure would increase the ability for emission standards to be enforced.

The following six companies currently have AECPs, or are in the process of obtaining an AECP:

<u>Company</u>	<u>Company Name</u>	<u>District</u>
58	American National Can	11
152	Tri Valley Growers Container	11
218	Beatrice/Hunt Wesson Division	11
401	Packaging Industries, Inc	20
1761	Myers Container Corp	11
2173	Crown Cork and Seal	11

### Regulatory History

The District and the EPA have allowed the use of AECPs for many years, although the degree of flexibility allowed within AECPs has generally decreased. This control measure proposes to eliminate the remaining AECPs which do not conform to EPA's 1986 Federal Emissions Trading Policy, as well as the AECPs which are considered EPA "approvable." The District has eliminated non-approvable AECP provisions from all but two District rules: (1) Rule 8-32, Wood Furniture and Cabinet Coatings, and (2) Rule 8-43, Surface Coating of Marine Vessels. It should be noted that there are no facilities currently operating under AECPs in either of these two rules.

Approvable AECPs include: (1) Rule 8-20, Graphic Arts Printing and Coating Operations, and (2) Rule 8-11, Metal Container, Closure and Coil Coating. Rule 8-20 has two AECP provisions: one for sources that had an AECP prior to May 26, 1988, and another with more stringent requirements for

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sources submitting plans after that date. The AECPP provisions of Rule 8-11 pertaining to can plants meet the less stringent emissions trading policy implied in an EPA interoffice memo of December 8, 1980. The can industry has referenced this document as an exemption from the 1986 Federal Emissions Trading Policy.

### Further Consideration

This Control Measure is predicated on the assumption that emissions from facilities subject to an AECPP are greater than the emissions from the use of compliant (low-VOC) coatings. This assumption is flawed. Typically an AECPP is used in a can manufacturing plant, emissions from non-compliant coatings are compensated for by the use of control equipment. The elimination of the AECPP removes a compliance option for the industry, should a compliant coating be found, it is likely that the use of the control device for another coating would be eliminated, unless required to avoid NSR or to generate emissions offsets. The control device probably produced a lower level of emissions for the plant than would the use of compliant coatings, where there exists no incentive to formulate to levels significantly below the VOC standards.

### Emissions Subject to Control

The affected source categories are *can and coil coating* and certain printing categories. The projected emissions subject to control are given below.

<u>Year</u>	<u>Emissions Subject to Control (TPD, Summer)</u>
1994	8.00
1997	8.68
2000	9.00

### Proposed Method of Control

The affected facilities would have to comply by using complying coatings or by abating emissions. The can manufacturers have claimed that a wide range of coatings that comply with existing VOC limits are not available. For cases where acceptable complying coatings could not be developed, the use of add-on abatement devices such as incinerators or carbon adsorbers would be necessary.

### Emission Reductions Expected

In order to address uncertainty in the emission reductions that will result from implementing this control measure, low and high estimates were made. This control measure was assumed to reduce ROG emissions from affected source categories by 2 to 4 percent.

The estimates below show the range of emission reductions achievable if the measure could be fully implemented in the corresponding year.

	EMISSION REDUCTIONS	
Year	Low (TPD, Summer)	High (TPD, Summer)
1994	.16	.32
1997	.17	.35

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2000	.18	.36
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### Costs of Control

It is believed that the majority to the affected companies will be able to come into compliance by switching to complying coatings. The cost of reformulation is not known because it is not possible to predict the amount of research necessary for a given coating category. It is likely that the cost per gallon of coatings will increase, but that this increase will be somewhat offset by a reduction in the volume of coating required, due to higher solids content. A cost-effectiveness of \$2000 per ton reduced is assumed, based on cost estimates used in the past for coating reformulation.

### Other Impacts

There is a possibility of an increase in the emissions of substances which may be toxic or deplete upper atmospheric ozone if coatings are reformulated with non-precursor or "exempt" solvents. The District, however, may not allow these type of solvent substitutions. In addition, the Clean Air Act requires a production phase out of these chemicals by the end of 1995. If incinerators are used as abatement devices, some increases in fuel consumption and NO<sub>x</sub> emissions will result.

If additional control of VOC emissions by incinerators is needed as a result of this control measure, an increase in natural gas consumption will occur. The use of thermal or catalytic incineration to control ROG emissions, may result in emissions of CO, NO<sub>x</sub> or other criteria air pollutants. There is also the possibility of minor increases in certain of the greenhouse gases (CO<sub>2</sub> and NO<sub>2</sub>) due to the combustion of organic compounds and the use of natural gas in the thermal oxidation abatement devices.

Where carbon adsorption systems are used to control ROG emissions, the activated bed eventually becomes "spent" and must be re-activated or disposed of at a licensed treatment storage and disposal facility (TSDF). Disposal of spent carbon adsorption filters may negatively impact solid waste disposal sites due to increased quantities of wastes. Spent carbon needs to be replaced or regenerated every 5 to 10 years. Spent carbon that is regenerated by injecting steam through the carbon bed may result in traces of solvent in wastewater after the steam/solvent mixture has been processed. However, wastewater impacts will be insignificant if generators comply with federal, State and local regulations.

The use of a carbon adsorption system could result in emissions of NO<sub>x</sub> and CO from the combustion of natural gas to generate steam for stripping the solvent from the carbon bed. There is also the possibility of minor increases in certain of the greenhouse gases (CO<sub>2</sub> and NO<sub>2</sub>) due to the combustion of natural gas to generate steam for the stripping the of the carbon beds.

### References

EPA Federal Emissions Trading Policy, 51FR 43813.

Compliance with VOC Emission Limitations for Can Coating Operations, 45FR 80024.

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## CM A13: IMPROVED GRAPHIC ARTS PRINTING AND COATING OPERATIONS RULE

*Parts (a, c) Adopted October 6, 1993; parts (b, d) determined to be not cost effective.*

### Background

This control measure would reduce ROG emissions from graphic arts printing operations by (1) reducing the allowed amount of organic solvent in fountain solutions used in offset lithography, (2) requiring the use of automatic washing systems for cleaning large printing presses, (3) requiring the use of lower VOC inks and, (4) requiring enclosure of doctor blades used for defining the ink layer on printing cylinders.

The graphic arts industry produces advertising copy, flexible packaging, floor coverings, magazines, newspaper supplements, posters, and wallpaper. Graphic arts operations consist of the two broad categories of printing and coating. Printing involves impressing color, design, or words on individual sections of substrate (e.g., paper) or on a continuous roll (web) of substrate, not necessarily covering the entire surface.

Offset lithography involves the printing of an etched image from a plate, parts of which are inked and other parts of which are treated to repel ink. Fountain solutions are used to maintain the hydrophilic properties of the non-image areas and to keep the non-image areas free from ink. The fountain solutions usually contain isopropanol.

Flexographic printing is the application of words, designs, and pictures to a substrate by means of a roll printing technique (most processes are web fed). In this method, ink is applied to a rubber cylinder which in turn applies the ink to the substrate.

In gravure printing, the image area is engraved relative to the surface of the image carrier. The gravure cylinder rotates in an ink trough or fountain. The ink is picked up in the engraved area, and is scraped off the non-image area with steel "doctor blades."

There are approximately 80 large facilities in the District conducting graphic arts coating operations. There are probably thousands of small offset printing shops operating within the District.

### Regulatory History

The District regulates the emissions of precursor organics from the graphic arts industry under Regulation 8, Rule 20. Rule 8-20 currently limits the VOC content of fountain solutions to 15 percent, by volume. Low VOC inks, coatings and adhesives with a VOC content less than 300 grams per liter are currently allowed under Rule 8-20.

As an alternative to low VOC materials, emissions may be controlled by an approved add-on emission control system. Collection systems must be designed for "maximum collection of fugitive emissions," although specific design criteria are not specified.

Section 307 of Rule 8-20 governs the use of cleanup solvents, but only requires that solvents and rags be stored in closed containers. No particular cleaning methods or materials are currently mandated.

The South Coast AQMD has a similar graphics arts rule (SCAQMD Rule 1130). SCAQMD Rule 1130 limits the VOC content of fountain solutions to 100 grams per liter, effective January 1, 1991.

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## Emissions Subject to Control

The affected source categories are the various printing categories including *offset lithographic printing*, *flexographic printing* and *rotogravure printing* (only a portion of the total emissions from printing categories will be affected by this control measure). The projected emissions subject to control are given below.

<u>Year</u>	<u>Emissions Subject to Control (TPD, Summer)</u>
1994	.73
1997	.79
2000	.82

## Proposed Method of Control

This control measure would reduce the allowable amount of organic solvent in fountain solutions. Reductions in fountain solution VOC content from the existing 15 percent standard to 10 percent are believed to be feasible. This would be accomplished by reformulation of fountain solutions. There has been considerable work in this area in recent years, and solvent contents currently range from ten to fifteen percent. Further reformulation will most likely be required to meet the 10 percent limit.

This control measure also would require the use of an automated system, instead of manual wipe cleaning, to clean the printing cylinders of large printing presses. These cleaning systems can be used in web or sheet-fed printing operations. Similar wash systems are currently being used in the District by California Color Printing in Pittsburg and by First Western Graphics in San Leandro.

In the automated wash process, the cleaning solvents are transferred to the web or sheet, and about two-thirds of the solvents are recovered. The remainder of the solvent evaporates in the drying oven. Drying oven exhaust is then controlled by an add-on abatement device, if present. The net result is that less cleaning solvent is used and cleaning solvent emissions are abated. Note that this system may only be proposed for presses whose emissions are abated downstream. If no abatement device exists, the solvent from the wash system would be emitted to the atmosphere.

Another part of this control measure involves reducing the amount of organic solvent allowed in low VOC inks for certain printing processes. Presently, waterborne inks contain between 50 and 285 grams VOC per liter. New technology exists which replaces solvent with soya bean oil. These inks contain between 15 and 105 grams VOC per liter and are already in use in certain printing operations in the District.

Finally, this control measure proposes to reduce fugitive VOC emissions by requiring the enclosure of doctor blades, which are used on rotogravure and some flexographic presses. This requirement will reduce VOC emissions by increasing capture efficiency.

## Emission Reductions Expected

In order to address uncertainty in the emission reductions that will result from implementing this control measure, low and high estimates were made. This control measure was assumed to reduce ROG emissions from offset printing operations by 30 to 40 percent. The affected emissions from other printing operations were assumed to be reduced by 20 to 30 percent.

The estimates below show the range of emission reductions achievable if the measure could be fully implemented in the corresponding year.

<b>EMISSION REDUCTIONS</b>		
<i>Year</i>	<i>Low (TPD, Summer)</i>	<i>High (TPD, Summer)</i>
1994	.17	.24
1997	.19	.26
2000	.19	.27

## **Costs of Control**

Fountain solutions currently contain between 10 and 15 percent organic solvent, which is typically isopropyl alcohol. The cost-effectiveness of reducing the allowable limit to 10 percent is difficult to calculate because it is not possible to predict the amount of research and development work necessary to develop a satisfactory product.

The primary benefit of the automated blanket washer, from a manufacturing standpoint, is that it greatly reduces the amount of cleaning solvent used and the amount of press downtime relative to manual wipe cleaning. In light of this, automated wash systems should result in a cost savings. Information received from manufacturers indicates that an automated wash system could pay for itself within 6 months to one year.

The cost of ink reformulation is not known because it is not possible to predict the amount of research necessary for a given ink category. It is likely that the cost per gallon of ink will increase somewhat. A cost-effectiveness of \$2000 per ton reduced is assumed, based on cost estimates used in the past for coating and ink reformulation.

The costs of enclosing doctor blades should not exceed \$10,000 per press. The cost-effectiveness of this measure is unknown because the fugitive emissions from these sources have not been adequately quantified.

## **Other Impacts**

Decreasing the organic solvent content of fountain solutions used in offset lithographic printing presses is not expected to have any significant adverse impacts.

The use of an automatic blanket washer would reduce cleaning solvent usage, which in turn, would reduce the amount of spent solvent or hazardous waste that would need to be transported off site. If additional control of ROG emissions by incinerators is needed as a result of this control measure, an increase in natural gas consumption will occur. The use of thermal or catalytic incineration to control ROG emissions, may result in emissions of CO, NO<sub>x</sub> or other criteria air pollutants. There is also the possibility of minor increases in certain of the greenhouse gases (CO<sub>2</sub> and NO<sub>2</sub>) due to the combustion of organic compounds and the use of natural gas in the thermal oxidation abatement devices.

There is a possibility of an increase in the emissions of substances which may be toxic or which deplete upper atmospheric ozone if inks are reformulated with non-precursor or "exempt" solvents, although this has generally not occurred in the past. In any event, the District may not allow these type of solvent substitutions.

Enclosing doctor blades will not produce any significant adverse environmental impacts. Some reductions in VOC levels in the workplace should result due to increased capture of fugitive emissions.

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## References

South Coast Air Quality Management District, Proposed Amended Rule 1130 - Graphic Arts, Public Notice, February 22, 1990.

Oxy-Dry Corporation, Brochure for Oxy-Dry Automatic Blanket Washer.

Precision Engineered Systems, Inc., Brochure for Precision Automatic Blanket Wash System.

## B. FUELS/ORGANIC LIQUIDS STORAGE AND DISTRIBUTION

### CM B1: CONTROL OF EMISSIONS FROM RAILCAR LOADING

*Determined to be not cost effective / minimal emissions reductions*

#### Background

This control measure would reduce ROG emissions from the loading of organic liquids into railcars by establishing vapor recovery requirements. The measure would most likely apply only to organic liquids of a specified volatility (e.g. true vapor pressure greater than 0.5 psia).

Loading losses occur from railcars as the organic vapors in the empty cargo tanks are displaced to the atmosphere by the liquid being loaded into the tanks. The method of loading and the loading history of the tank are both important factors in the quantity of emissions which result from railcar loading.

The number of facilities that would be affected by this control measure and the quantity of organic liquids loaded into railcars within the District are currently unknown.

#### Regulatory History

The District currently regulates the off-loading of railcars into stationary tanks. There are no District requirements for Phase I controls during the loading of railcars.

#### Emissions Subject to Control

The emissions from railcar loading operations have not been quantified due to insufficient information.

#### Proposed Method of Control

This control measure would require the design and installation of a vapor balance system to control the VOC emissions during railcar loading operations. As the railcar is loaded, the headspace vapors would be displaced either directly into a vapor processing unit or into an intermediate vapor storage tank. Appropriate control technology available for vapor processing include refrigeration, carbon adsorption, or thermal oxidation.

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## Emission Reductions Expected

ROG emission reductions of 80 to 90 percent are expected from affected sources. Because the emissions from railcar loading operations have not been quantified, however, the total emission reductions from this control measure are unknown at this time.

## Costs of Control

The costs of the vapor collection system would be minimal, consisting of plumbing and piping capable of capturing the displaced vapors as the railcar is loaded. The major expense would be at those facilities without an existing vapor processing system. It is anticipated that most of the facilities affected by this control measure have existing vapor processing equipment that could be used for abating the emissions from railcar loading. The exact costs for the processing equipment will depend upon the control technology selected and the required capacities. Typical capital costs for processing equipment should range between \$200,000 and \$800,000 per installation. The average cost-effectiveness of this control measure is estimated to be roughly \$4000 per ton reduced.

## Other Impacts

Where ROG emissions are controlled by incinerators, an increase in natural gas consumption will occur. The use of thermal or catalytic incineration to control ROG emissions, may result in emissions of CO, NO<sub>x</sub> or other criteria air pollutants. There is also the possibility of minor increases in certain of the greenhouse gases (CO<sub>2</sub> and NO<sub>2</sub>) due to the combustion of organic compounds and the use of natural gas in the thermal oxidation abatement devices.

Where carbon adsorption systems are used to control ROG emissions, the activated bed eventually becomes "spent" and must be re-activated or disposed of at a licensed treatment storage and disposal facility (TSDF). Disposal of spent carbon adsorption filters may negatively impact solid waste disposal sites due to increased quantities of wastes. Spent carbon needs to be replaced or regenerated every 5 to 10 years. Spent carbon that is regenerated by injecting steam through the carbon bed may result in traces of solvent in wastewater after the steam/solvent mixture has been processed. However, wastewater impacts will be insignificant if generators comply with federal, State and local regulations.

The use of a carbon adsorption system could result in emissions of NO<sub>x</sub> and CO from the combustion of natural gas to generate steam for stripping the solvent from the carbon bed. There is also the possibility of minor increases in certain of the greenhouse gases (CO<sub>2</sub> and NO<sub>2</sub>) due to the combustion of natural gas to generate steam for the stripping the of the carbon beds.

## References

None.

## CM B3: IMPROVED ORGANIC CHEMICAL TERMINAL AND BULK PLANT RULE

*Adopted February 2, 1994*

## Background

This control measure would reduce ROG emissions from non-gasoline bulk plant operations by modifying the exemption criteria and by lowering the existing emission limitation.

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Non-gasoline terminals and bulk plants are facilities in which liquid organic chemicals are received, stored in stationary tanks, and loaded into tank trucks or other cargo carriers for delivery to other plants or distribution points. ROG emissions occur from loading and unloading operations, and from storage tanks.

The majority of the organic compounds stored and transferred at bulk plants currently meet an existing volatility exemption, and therefore are not subject to vapor recovery requirements.

## Regulatory History

The District regulates emissions from organic chemical terminals and bulk plants under Regulation 8, Rule 6. Rule 8-6 currently requires bulk loading operations of non-gasoline organic liquids with a true vapor pressure over 1.5 psia to have a suitable vapor recovery system. The current emission limitation for a mandated vapor recovery system is 0.65 pounds of ROG emission per 1,000 gallons of product loaded.

## Emissions Subject to Control

A specific source category currently does not exist for organic liquid terminals and bulk plants. The emissions from these sources are contained in the category *organics evaporation -- other*. The projected emissions subject to control are given below.

<u>Year</u>	<u>Emissions Subject to Control (TPD, Summer)</u>
1994	.45
1997	.47
2000	.49

## Proposed Method of Control

It is proposed to reduce the vapor pressure exemption of Rule 8-6, thereby subjecting a larger number of organic liquids to vapor recovery requirements. Reducing the exemption cut-off to a true vapor pressure of 0.5 psia would greatly increase the number of chemicals that would have to meet the vapor recovery requirement.

This control measure also proposes to reduce the emission limitation to reflect recent advances in control technology. A more suitable emission limit would be 0.50 pounds of ROG per 1,000 gallons of product loaded. This would match the latest changes made in Rule 8-39 for gasoline bulk plants, made on October 7, 1987.

The affected facilities could implement existing technology currently used at gasoline bulk terminals to comply with this control measure. Typical control technologies are vapor balance, carbon adsorption, thermal incineration, and refrigeration.

## Emission Reductions Expected

In order to address uncertainty in the emission reductions that will result from implementing this control measure, low and high estimates were made. ROG emissions were assumed to be reduced by 40 to 60 percent from affected sources.

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The estimates below show the range of emission reductions achievable if the measure could be fully implemented in the corresponding year.

	<b>EMISSION REDUCTIONS</b>	
<i>Year</i>	<i>Low (TPD, Summer)</i>	<i>High (TPD, Summer)</i>
1994	.18	.27
1997	.19	.28
2000	.20	.30

## **Costs of Control**

For those facilities without existing control devices, the costs will include both a collection and vapor processing system. The control costs will vary greatly depending upon the selected control technology. Vapor balance would be the least expensive followed by thermal incineration, carbon adsorption, and refrigeration. Capital costs for vapor processing systems are estimated to be between \$175,000 and \$350,000 per facility. It is expected, however, that in most cases the costs of control will be completely offset by product recovery credits. This has been demonstrated to be true for gasoline bulk plant vapor recovery systems.

## **Other Impacts**

Where ROG emissions are controlled by incinerators, an increase in natural gas consumption will occur. The use of thermal or catalytic incineration to control ROG emissions, may result in emissions of CO, NO<sub>x</sub> or other criteria air pollutants. There is also the possibility of minor increases in certain of the greenhouse gases (CO<sub>2</sub> and NO<sub>2</sub>) due to the combustion of organic compounds and the use of natural gas in the thermal oxidation abatement devices.

Where carbon adsorption systems are used to control ROG emissions, the activated bed eventually becomes "spent" and must be re-activated or disposed of at a licensed treatment storage and disposal facility (TSDF). Disposal of spent carbon adsorption filters may negatively impact solid waste disposal sites due to increased quantities of wastes. Spent carbon needs to be replaced or regenerated every 5 to 10 years. Spent carbon that is regenerated by injecting steam through the carbon bed may result in traces of solvent in wastewater after the steam/solvent mixture has been processed. However, wastewater impacts will be insignificant if generators comply with federal, State and local regulations.

The use of a carbon adsorption system could result in emissions of NO<sub>x</sub> and CO from the combustion of natural gas to generate steam for stripping the solvent from the carbon bed. There is also the possibility of minor increases in certain of the greenhouse gases (CO<sub>2</sub> and NO<sub>2</sub>) due to the combustion of natural gas to generate steam for the stripping the of the carbon beds.

Positive impacts include product recovery and possibly decreased emissions of toxic air contaminants.

## **References**

None.

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## CM B4: FURTHER EMISSION REDUCTIONS FROM GASOLINE DELIVERY VEHICLES

*Adopted by California Air Resources Board action, April, 1996*

### Background

This control measure would reduce ROG emissions from gasoline delivery vehicles loading at bulk terminals and controlled bulk plants by setting more stringent performance requirements for vapor recovery components. Under existing State code, the California Air Resources Board (CARB) would need to implement this measure for the State of California.

There are approximately 4,200 CARB-certified gasoline cargo tanks in California. In calendar year 1989, there were approximately 1,830 cargo tank loadings per day at gasoline bulk terminals in the Bay Area.

In 1986, the District received certification, from CARB, for a pressure decay test method to be used for compliance determination of cargo tanks. This test method is currently the only accurate in-field method for determining the status of the cargo tank vapor vent valves.

### Regulatory History

Section 41962(h) of the California Health and Safety Code (CH&SC) states: "Performance standards of any district for cargo tank vapor recovery on tank vehicles used to transport gasoline shall be identical with those adopted by the state board therefor and no district shall adopt test procedures for, or require certification of, cargo tank vapor recovery systems."

On April 18, 1977, CARB adopted "Certification and Test Procedures for Vapor Recovery Systems of Gasoline Delivery Vehicles" (Method 2-5). These certification procedures were subsequently amended on September 1, 1982, and February 24, 1984. Current standards for gasoline cargo tanks include: (1) annual certification and year-round criteria for pressure decay and, (2) criteria for the pressure increase past the cargo tank vapor vent valve.

On September 1, 1982, CARB adopted "Test Procedures for Gasoline Vapor Leak Detection Using Combustible Gas Detectors." This indirect correlation of a hydrocarbon concentration to the pressure decay standards was the only allowed test procedure for determining compliance with the year-round pressure decay standards for gasoline cargo tanks. This procedure cannot, however, be used to quantify the pressure increase past the vapor vent valve(s).

In 1985, the District's Source Test Section developed a new test procedure that accurately quantifies both the pressure decay from the cargo tank and the pressure increase past the vapor vent valve. The District submitted this method (Source Test Procedure ST-33) to CARB on July 25, 1985, and it was approved as an alternate method (pursuant to Section 41962 of the CH&SC) on January 27, 1986 (see CARB Executive Order G-70-106).

The current State year-round standards for gasoline cargo tanks are as follows:

Cargo Tank Capacity, <i>(in Gallons)</i>	Allowable Pressure Decay <i>(in 5 Minutes, inches W.C.)</i>
1,500-2,499	3.0
1,000-1,499	3.5
0-999	4.0

The corresponding CARB certification pressure decays are 1.0, 1.5, 2.0, and 2.5 inches w.c., respectively.

The internal vapor valve must be maintained to meet the following requirement: A pressure increase of no more than five inches of water (gauge) shall occur in five minutes when the delivery tank is pressurized to 18 inches of water (gauge) according to the procedures in Section IX-E.

### Emissions Subject to Control

The affected source category is *fuels distribution -- trucking*. The projected emissions subject to control are given below.

<u>Year</u>	<u>Emissions Subject to Control (TPD, Summer)</u>
1994	.17
1997	.17
2000	.17

### Proposed Method of Control

The proposed method of control is a two-phase strategy. First, it is necessary to replace the 13 year-old decay standards. State-of-the-art advancements in cargo tank domes, P/V valves, and gasketing material have made the existing standards obsolete. After reviewing a large number of cargo tank certification tests, the following Table should be submitted to CARB for workshop and adoption:

Cargo Tank Capacity, (Gallons)	Allowable Pressure Decay (in 5 Minutes, inches W.C.)	
	Annual Certification	Year-Round
> 2,500	0.5	1.5
1,500-2,499	1.0	2.0
1,000-1,499	1.5	2.5
0 - 999	2.0	3.0

The second phase of control is to have CARB rewrite the vapor vent valve portion of Method 2-5 to specify that a pressure decay test method shall be used to determine year-round compliance of the vapor vent valves. This will also require CARB to adopt an appropriate pressure decay test method.

### Emission Reductions Expected

In order to address uncertainty in the emission reductions that will result from implementing this control measure, low and high estimates were made. ROG emissions were assumed to be reduced by 30 to 40 percent from the affected source category.

The estimates below show the range of emission reductions achievable if the measure could be fully implemented in the corresponding year.

	<b>EMISSION REDUCTIONS</b>	
<i>Year</i>	<i>Low (TPD, Summer)</i>	<i>High (TPD, Summer)</i>
1994	.05	.07
1997	.05	.07
2000	.05	.07

## **Cost of Control**

The costs of this control measure would be minimal. Once the appropriate repairs to the cargo tanks have been made, the equipment can be kept in compliance during their preventative maintenance inspections. The largest capital expenditure will be for those cargo tanks with internal vapor vent valves which cannot, due to design, meet the vapor vent valve standard. The average cost per vehicle is estimated to be about \$360 per year. It is expected that, in most cases, the costs of this control measure will be completely offset by product recovery.

## **Other Impacts**

There should be no adverse environmental impacts as a result of this measure. There will be a fire safety advantage due to the reduced vapor leaks both while in transit and upon arrival at the gasoline dispensing facility. There will also be a substantial reduction of VOC emissions during cargo tank transit operations. Because the benzene concentration of the headspace vapors is approximately 2,900 ppm, there will also be a reduction in the emissions of this toxic air contaminant.

## **References**

BAAQMD Interoffice Memo from Ken Kuaniec to Gale Karels, 1986.

California Air Resources Board Method 2-5, "Certification and Test Procedures for Vapor Recovery Systems of Gasoline Delivery Vehicles," Amended February 24, 1984.

California Air Resources Board Test Procedure, "Test Procedure for Gasoline Vapor Leak Detection Using Combustible Gas Detector," Adopted September 1, 1982.

"A Test Method for the Pressure Integrity of Gasoline Cargo Tanks," BAAQMD, K.M. Kuaniec, G.G. Karels, D.A. Levaggi.

## **CM B7: CONTROL OF EMISSIONS FROM PROPANE HANDLING**

*Determined to be not cost effective*

### **Background**

This control measure would reduce ROG emissions by eliminating uncontrolled gas venting during LPG fuel transfers, and by banning uncontrolled venting during servicing of larger tanks.

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During some LPG gas transfers, ROG emissions occur when the receiving tank is vented to the atmosphere. The installation of a bleed-off gas recovery device would reduce emissions of LPG which consists primarily of propane, butane, propylene and butylene.

This control measure would affect most commercial LP-gas distributors located within the District.

## **Regulatory History**

Currently the District does not regulate emissions from the transfer of LPG. At this time, there are also no federal or State requirements.

## **Emissions Subject to Control**

LPG fuel transfers are currently not covered under a specific source category, and the emissions from these sources are unknown at this time.

## **Proposed Method of Control**

In large scale operations, significant ROG emissions do not occur during LPG tank transfers because LPG is unloaded from delivery tanks to storage tanks through a closed system under pressure by means of a liquid pump or a gas compressor. When a liquid pump is used, connections are made between the liquid outlet of the delivery tank and the liquid inlet of the storage system as well as a similar connection for the vapor head space in both vessels. During transfer, pressure equalization is achieved between the vessels via the vapor connections. If a gas compressor is used, vapor head space taken from the storage tank can be discharged into the vapor space of the delivery tank. The result is be to create a pressure differential between the tanks and force the liquid from the delivery tank to the storage tank.

These large scale commercial techniques could be applied to medium or small users with good results. Smaller users could possibly adapt their existing equipment by use of a compressor attached to their bleed-off valve. During routine transfer operations, the amount of LPG that would normally be vented to the atmosphere could now be recondensed and pumped back into the storage tank.

A possible alternative method of control would be to abate the bleed-off valve emissions with an emission control device, such as a Hirt-type incineration system (frequently used at gasoline dispensing facilities). A carbon adsorption system could also be attached to the bleed-off valve to control LPG emissions.

## **Emission Reductions Expected**

ROG emission reductions of 80 to 90 percent are expected from affected sources. Because the emissions from LPG fuel transfer operations have not been quantified, however, the total emission reductions from this control measure are unknown at this time.

## **Costs of Control**

Purchase and installation costs for this control measure vary widely depending on the method of ROG abatement chosen. A compressor-type system would best accommodate most medium and small users with an initial installation cost of under \$1,000.

A more elaborate system like the Hirt System would have initial installation costs of up to \$10,000. If this system were installed at a GDF site, it could serve the dual purpose of LPG abatement and meeting Phase II requirements.

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Due to uncertainties regarding the emission reductions associated with this control measure, the cost-effectiveness is considered unknown at this time.

## Other Impacts

No adverse environmental impacts are expected as a result of this control measure, although the use of gas compressors will have some negative energy impacts.

## References

Gas Engineers Handbook, Industrial Press Inc., Section 514.

## CM C2: IMPROVED PUMP AND COMPRESSOR SEALS AT REFINERIES AND CHEMICAL PLANTS RULE

*(Adopted March 4, 1992)*

### Background

This control measure would reduce ROG emissions from pumps and compressors at refineries, chemical plants, and bulk distribution facilities by requiring improved seals.

Pumps and compressors are used for moving liquids and gases within a process unit or piping system. Pumps and compressors in hydrocarbon service can have fugitive emissions of organic compounds due to leaking seals. Advances in seal technology have resulted in pumps and compressors with significantly reduced fugitive emissions.

### Regulatory History

The District regulates the emissions of precursor organics from pumps and compressors at refineries and chemical plants under Regulation 8, Rule 25. Rule 8-25 requires that, if the concentration of organics at a distance of one-centimeter or less from the pump or compressor is greater than 10,000 ppm, the leak must be repaired immediately, or minimized and repaired by the next turnaround if the equipment is considered essential. Presently, Rule 8-25 requires that pumps and compressors be inspected quarterly. In September 1989, the inspection frequency was changed to quarterly from once per year, and the low vapor pressure exemption was changed to a cutoff point of 0.05 psia at 20° C.

### Emissions Subject to Control

The affected source category for refineries is *fugitives -- pump and compressor seals*. For chemical plants, the affected emissions are included within the category *fugitives (all mfg.) -- valves and flanges*. The projected emissions subject to control are given below. These estimates represent emissions from those sources that would need to replace seals.

<u>Year</u>	<u>Emissions Subject to Control (TPD, Summer)</u>
1994	1.04
1997	1.07
2000	1.10

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## Proposed Method of Control

This control measure would require the replacement of older pumps and compressors which leak with equipment with "leakless" or other advanced design. Mechanical seal vendors appear to be willing to guarantee 1000 ppm leak-levels and data from the refineries show that at least 90 percent of the affected equipment already meets this limit. Data from a seal testing laboratory shows emission levels as low as 100 ppm for single mechanical seals. Retrofit installation of these seals on existing pumps should allow levels of 500 ppm and, in many cases, 100 ppm to be achieved. Where single mechanical seals cannot be used, there are other alternative technologies including double mechanical seals, tandem mechanical seals, magnetic drive pumps, or canned pumps. When properly maintained, the alternative mechanical seals can achieve nearly unmeasurable emissions, while the magnetic drive and canned pumps have emissions that are unmeasurable.

EPA is proposing a leak-level of 1000 ppm for pumps at chemical plants with no decision yet on refineries. The South Coast now requires a leak-level of 1000 ppm. Requiring a leak-level of 100 ppm would result in a 80 to 90 percent reduction from the present estimated fugitive emission levels for pumps. This estimate is based on data supplied by Exxon and Unocal and the SOCOMI study emission factors.

## Emission Reductions Expected

In order to address uncertainty in the emission reductions that will result from implementing this control measure, low and high estimates were made. ROG emissions were assumed to be reduced by 80 to 90 percent for affected sources.

The estimates below show the range of emission reductions achievable if the measure could be fully implemented in the corresponding year.

	<b>EMISSION REDUCTIONS</b>	
<i>Year</i>	<i>Low (TPD, Summer)</i>	<i>High (TPD, Summer)</i>
1994	.83	.93
1997	.86	.96
2000	.88	.99

## Costs of Controls

Assuming that pumps and compressors can achieve lower emission levels by adding improved single mechanical seals, the costs would be about \$2000 per leaking pump. This estimate is based on vendor information. The labor needed to make these changes is probably about 5 hours. If tandem, double, magnetic drive, or canned pumps are used, the capital costs will be higher. It is estimated that about 20 percent of existing equipment will require new seals.

Because pumps need to be maintained on a periodic basis, there should be no additional operation and maintenance costs associated with this control measure. The overall cost-effectiveness of this control measure is estimated to be roughly \$2000 per ton of ROG reduced.

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## Other Impacts

This control measure will reduce emissions of benzene, a toxic air contaminant, as well as lower the amount of odorous emissions. There will also be less product loss resulting in more efficient refinery and chemical plant operation. Also, less fugitive emissions may help lower the risk of fires.

## References

Personal communications with BWIP, Crane, and Dean Pumps by Harold Lips, BAAQMD, 1990.

EPA-450/3-88-010, Report on Fugitive Emissions (SOCMI report), October 1988.

Personal communications with the refineries by Wayne Kino, BAAQMD, September, 1990.

## CM C3: IMPROVED VALVES AND FLANGES AT REFINERIES AND CHEMICAL PLANTS RULE

*This control measure denoted as part (a), adopted March 4, 1992; 1997 CAP includes a new part (b).*

## Background

This control measure would reduce ROG emissions from valves and flanges at chemical plants and refineries by requiring improved packing materials and gaskets, and a more stringent inspection and maintenance program.

Valves are used for regulating the flow of a fluid in a piping system by permitting or blocking the passage of gases or liquids. Valves in hydrocarbon service can have fugitive emissions of organic compounds due to leaking valve-stem packing materials.

Flanges are the projecting rims of a pipe or piping component that are used to attach pipes or components together. Fugitive emissions from flanges can occur due to leaking gaskets.

## Regulatory History

The District regulates the emissions of precursor organics from valves and flanges at petroleum refinery complexes under Regulation 8, Rule 18. The emissions from valves and flanges at chemical plants are regulated under Regulation 8, Rule 22. Rules 8-18 and 8-22 require that, if the concentration of organics at a distance of one-centimeter or less from the equipment is greater than 10,000 ppm, the leak must be repaired immediately, or minimized and repaired by the next turnaround if the equipment is considered essential.

Presently, Rules 8-18 and 8-22 require that accessible valves be inspected quarterly and inaccessible valves be inspected annually. There are also limits on how many valves can be awaiting repair. There are no periodic inspection requirements for flanges.

## Emissions Subject to Control

The affected source category for refineries is *fugitives -- valves and flanges*. For chemical plants, the affected emissions are included within the category *fugitives (all mfg.) -- valves and flanges*. The projected emissions subject to control are given below. These estimates represent emissions from leaking equipment that would need to be replaced or modified.

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<u>Year</u>	<u>Emissions Subject to Control (TPD, Summer)</u>
1994	2.51
1997	2.59
2000	2.66

### **Proposed Method of Control**

Advances in technology have resulted in valves and flanges with reduced fugitive emissions. This control measure would require replacing older valves which leak with valves with "leakless" or other advanced designs. Valve and/or packing manufacturers seem willing to guarantee 500 ppm leak-levels, and data from the refineries show that 98 percent of existing valves already meet this limit. In addition, EPA is proposing a leak-level of 500 ppm for valves and flanges at chemical plants, with no decision made yet on refineries. The South Coast AQMD now requires a leak-level of 1000 ppm. Requiring a leak-level of 100 ppm would result in a 70 to 95 percent reduction from the present estimated fugitive emission levels for valves and flanges.

This control measure also proposes more stringent inspection and maintenance procedures for valves and flanges. Some type of periodic inspection schedule for flanges could be added. In addition, leak checks should be required before installation.

### **Emission Reductions Expected**

In order to address uncertainty in the emission reductions that will result from implementing this control measure, low and high estimates were made. ROG emissions were assumed to be reduced by 70 to 95 percent for affected sources.

The estimates below show the range of emission reductions achievable if the measure could be fully implemented in the corresponding year.

	<b>EMISSION REDUCTIONS</b>	
Year	Low (TPD, Summer)	High (TPD, Summer)
1994	1.76	2.39
1997	1.81	2.46
2000	1.86	2.53

### **Costs of Controls**

Assuming that components will comply by replacing packing material or gaskets, the cost would be about \$300 per leaking valve and \$50 per leaking flange. These cost estimates are from vendors for adding new carbon base packing. Since 98 percent of the valves already achieve 500 ppm and most of the leaking valves will probably be control valves, it is estimated that about 10 percent of the valves will require new packing material. As an approximation, it can also be estimated that 10 percent of the flanges will need new gaskets.

The labor costs for these changes will be minimal because mainly control valves will need to be modified (these valves need to be maintained on a periodic basis). There will be no additional

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operation and maintenance costs. For flanges, approximately one-hour of labor is estimated. Some unidentified cost savings will result from this control measure due to less product losses.

The overall cost-effectiveness of this control measure is estimated to be about \$1000 per ton of ROG reduced.

### **Other Impacts**

This control measures will reduce emissions of benzene, a toxic air contaminant, as well as lower the amount of odorous emissions. There will also be less product loss resulting in more efficient refinery and chemical plant operation. Also, less fugitive emissions may help lower the risk of fires.

### **References**

Personal communications with Garlock and Chesterton by Harold Lips, BAAQMD, 1990.

EPA-450/3-88-010, Report on Fugitive Emissions (SOCMI report), October 1988.

DCN 79-219-370-03, Radian Report on Valve Leak Rates, January 24, 1979.

## **D. COMBUSTION OF FUELS**

### **CM D1: CONTROL OF EMISSIONS FROM NON-UTILITY RECIPROCATING ENGINES**

*(Adopted January 20, 1993)*

#### **Background**

This control measure would reduce NO<sub>x</sub> emissions from stationary reciprocating internal combustion (IC) engines by establishing NO<sub>x</sub> standards for these sources. In nearly all instances, the measure would require the installation of add-on controls to existing unregulated engines to meet mandated NO<sub>x</sub> levels, or the replacement of IC engines with electric motors. It is anticipated that the measure would affect engines with 50 HP output or greater.

The District currently permits about 180 non-electric generating reciprocating IC engines. Many more are operating, because engines with less than 250 HP are exempted from permitting requirements. These facilities do not have add-on controls, such as nonselective catalytic reduction (NSCR) and selective catalytic reduction (SCR), applied to their engines and would therefore be affected by this control measure. Some do have combustion modifications which are directed at increasing engine efficiency and/or reducing NO<sub>x</sub> emissions.

EPA's "Compilation of Emission Factors" (AP 42) gives emission factors for uncontrolled IC engines, depending on size, function and fuel type. These emission factors are summarized below:

AP 42 UNCONTROLLED NO <sub>x</sub> EMISSION FACTORS IN GM/HP-HR				
	<i>Natural Gas</i>	<i>Gasoline</i>	<i>Dual Fuel</i>	<i>Diesel</i>
Heavy Duty Natural Gas Fired Pipeline Compressor Engines	13			
Industrial Engines		5		14
Large Bore Diesel and Dual Fuel Engines			8	11

Many factors affect the actual emissions of IC engines once they are in operation, such as air-fuel ratio, ignition timing and combustion temperature. These can be highly variable. Regular maintenance and tuning are critical to controlling emissions from these engines with or without engine modifications or add-on control devices.

## Regulatory History

Currently, the District does not specifically regulate emissions from existing reciprocating engines. IC engines with less than 250 HP output rating are exempt from permitting requirements.

On October 26, 1979, the State of California Air Resources Board (CARB) staff released a "Proposed Strategy for the Control of Oxides of Nitrogen From Stationary Internal Combustion Engines." The report asserted "technology is available to reduce NO<sub>x</sub> emissions to no more than 0.28 ug/joule (0.75 gm/brake hp-hr)." CARB staff proposed that all new engines meet this limit by January 1, 1982, and that all existing engines except diesels meet the limit by January 1, 1983. It was proposed that existing diesels meet a limit of 3.0 ug/J (8.1 gm/brake hp-hr) by January 1, 1981.

The CARB staff proposal for IC engines was not formally recommended to the Bay Area for adoption. However, it is a useful indication of the state-of-the-art of NO<sub>x</sub> control a decade ago. Progress in emission control strategies for reciprocating engines can be tracked to some extent by noting changes in rules developed by the South Coast AQMD (SCAQMD).

SCAQMD Rule 1110.1 (adopted 10/26/84) regulated emissions from stationary IC engines. It set requirements for engines with more than 50 rated brake horsepower as follows: (1) rich-burn engines - 90 percent reduction in NO<sub>x</sub> emissions initially and 80 percent thereafter, or a NO<sub>x</sub> limit not to exceed 90 ppm (by volume, dry) at 15% O<sub>2</sub>, and a CO limit not to exceed 2000 ppm (by volume, dry) at 15% O<sub>2</sub>; (2a) lean-burn engines -- 80 percent reduction in NO<sub>x</sub> emissions initially and 70 percent thereafter, or a NO<sub>x</sub> limit not to exceed 150 ppm (by volume, dry) at 15% O<sub>2</sub> (no CO limit), or (2b) engines controlled exclusively by combustion modification -- NO<sub>x</sub> not to exceed 2 g/bhp-hr or 150 ppm (vol., dry) at 15% O<sub>2</sub>. A few engines were exempted from this rule.

Kern County Rule 427 currently has NO<sub>x</sub> and CO limits identical to those in SCAQMD Rule 1110.1.

Ventura County Rule 74.9 (adopted 7/21/85, revised 7/2/85, 9/5/89) closely parallels South Coast Rule 1110.1. The NO<sub>x</sub> limit for rich-burn engines is 50 ppm @ 15% O<sub>2</sub>, or no less than 90 percent reduction; for lean-burn engines the limit is 125 ppm @ 15% O<sub>2</sub>, or no less than 80 percent reduction. The CO limit is 4500 ppm @ 15% O<sub>2</sub>. The ROG limit is 250 ppm (15% O<sub>2</sub>) for rich-burn, and 750 ppm (15% O<sub>2</sub>) for lean-burn.

The above rules allow for a great variation in the level of actual emissions, since the limit is expressed as a permissible concentration or the percent reduction (across a control device or relative to a baseline emission rate). It is unclear how a percent reduction can be determined if the control measure employed is engine modification. These rules typically do not clearly state baseline conditions or cite

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AP 42 emission factors as a reference. There are also uncertainties if the limit is taken as a percent reduction across a control device. Without requiring that the engine itself be tuned to both optimize efficiency and minimize emissions, "controlled" emissions could be high. For all these reasons, this sort of limit is difficult to enforce. An emission limit expressed as a concentration or based on engine output is a more practical solution.

On 8/3/90, the South Coast AQMD adopted Rule 1110.2, Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines. This Rule supersedes 1110.1 and is vastly more stringent. It requires that all stationary IC engines over 50 bhp, and all portable engines over 100 bhp, be replaced with an electric motor, or reduce emissions of CO to 2000 ppm, of NO<sub>x</sub> to 36 ppm (approx. 0.44 to 0.49 gm/brake hp-hr) and of ROG measured as methane to 250 ppm (all measured by volume corrected to 15 percent oxygen on a dry basis and averaged over 15 minutes). This emission limit corresponds to a 93 to 97 percent reduction from the AP 42 emission factors. The requirements are modified by an efficiency factor for electric power generating engines, landfill-gas- or sewage-digester-gas-fueled engines and others. There are exemptions for certain engines such as those used in agriculture, for emergencies, for research, etc.

### Emissions Subject to Control

The affected source categories are *reciprocating engines* for gasoline, gas, and other liquid fuels, as well as *cogeneration -- reciprocating engines*. The projected NO<sub>x</sub> emissions subject to control are given below.

<u>Year</u>	<u>Emissions Subject to Control (TPD, Summer)</u>
1994	9.01
1997	9.45
2000	9.86

### Proposed Method of Control

The NO<sub>x</sub> limit specified in SCAQMD Rule 1110.2, 36 ppm @ 15% O<sub>2</sub> dry, is proposed for the Bay Area. This control measure will typically require the installation of add-on controls to previously unregulated, and some unpermitted, equipment. Compliance is also possible by replacement with electric motors.

There are three broad categories of control measures for emissions from IC engines: operational modifications, engine combustion modifications, and post-combustion flue gas treatment (add-on controls). Often, NO<sub>x</sub> control can greatly increase CO and ROG emissions. Therefore the rule developed will also specify CO and/or ROG limits. Electrification will have the added advantage of reducing CO and ROG emissions.

### Operational Modifications

Operational modifications to reciprocating IC engines include changes in the air-fuel ratio, engine derating and spark or fuel ignition timing retard.

The air-fuel ratio is defined as the mass flow rate of air divided by the mass flow rate of the fuel. Operating an engine leaner than stoichiometric generally increases NO<sub>x</sub> emissions, but decreases CO and HC emissions. Operating an engine rich will reduce NO<sub>x</sub>, but can also increase CO and HC. Adjustment of the air-fuel ratio can achieve NO<sub>x</sub> reductions of between 14 percent (diesel and dual fuel engines) and 44 percent (gaseous fuel engines).

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An engine is derated by limiting its power output. The cylinder pressure and temperature are thus lowered, reducing the NO<sub>x</sub> formation rates. A 25 percent derate can give average NO<sub>x</sub> reduction of 34 percent with an average increase in fuel consumption of 6.5 percent. This method also increases ROG and CO emissions.

Peak cylinder temperatures may be reduced by retarding the spark timing, in gaseous fueled engines, and fuel injection timing, in diesel or dual-fuel engines. The NO<sub>x</sub> emissions are diminished because of the reduced time spent at elevated temperature. A retard of 6 degrees gives an average 25 percent reduction in NO<sub>x</sub>. There is generally no effect on ROG or CO emissions.

None of these methods is sufficient to meet the stringent emission requirement of 36 ppm @ 15% O<sub>2</sub>. However, post combustion controls are often added to engines employing operational modifications. These post combustion controls must also be designed to any added ROG and CO emissions.

## **Engine Combustion Modifications**

Engine modifications include stratified combustion (in which a fuel rich layer is situated near the spark plug), lean combustion (high air/fuel ratio), exhaust gas recirculation, and water injection. These methods usually involve various means to reduce combustion temperature and thus reduce thermal NO<sub>x</sub> formation. The technologies available depend on the type of engine and the type of fuel.

Pre-Stratified Charge (PSC) NO<sub>x</sub> control has been applied to rich-burn engines, achieving NO<sub>x</sub> emissions of 1.7 to 3 g/bhp-hr (100 to 200 ppm). These emissions are 40 to 80 percent below the AP 42 emission factors shown above; however, they are significantly short of the potential NO<sub>x</sub> reductions achievable with add-on control technology. This control method is highly dependent on engine tuning; it also increases CO and HC emissions, and may reduce the maximum horsepower output.

Recently there has been a great improvement in engine combustion modification for NO<sub>x</sub> control for both two- and four-stroke, spark-ignited engines. Five years ago NO<sub>x</sub> specific emissions of 1.5 g/bhp-hr (100 ppm) were achieved for engines retrofitted by combustion modification, but today NO<sub>x</sub> specific emissions of 0.29 to 0.59 g/bhp-hr (24 to 38 ppm) have been reported in initial tests for five 2000 bhp two-stage combustion retrofitted engines in the SCAQMD.

## **Post-combustion Flue Gas Treatment**

Post-combustion flue gas treatment is generally more effective in controlling NO<sub>x</sub> emissions than combustion modification. The most effective add-on control technologies are selective catalytic reduction (SCR) and nonselective catalytic reduction (NSCR). These technologies reduce NO<sub>x</sub> formed during combustion, to N<sub>2</sub> and water or CO<sub>2</sub>, through the use of a reducing agent and a catalyst. SCR and NSCR have been proven in practice and are commercially available.

SCR technology can be applied to lean burn engines (high air/fuel ratio). It uses ammonia added to the flue gas as a reducing agent. The gas then passes through a catalyst grid system. The NO<sub>x</sub> emissions are reduced by the ammonia to N<sub>2</sub> and water vapor over the catalyst surface. SCR achieves the best results at temperatures between 200° C and 400° C. For SCR technology, previously uncontrolled lean-burn engines have achieved reductions in NO<sub>x</sub> emissions to within the South Coast limit of 36 ppm.

The NSCR process uses fuel-rich engine operation to provide reducing agents in the flue gas. The gas then passes over a catalyst where NO<sub>x</sub> is reduced to nitrogen and water or CO<sub>2</sub>. For rich-burn engines with NSCR control technology, NO<sub>x</sub> emissions of 36 ppm have been achieved in practice.

A new development for diesel engine NO<sub>x</sub> control is the Raprenox Process, in which the exhaust NO<sub>x</sub> is treated in a reaction chamber with a reducing agent, cyanuric acid, to form N<sub>2</sub> and CO<sub>2</sub>. In this

process, a catalyst is not required to complete the chemical reaction for NO<sub>x</sub> reduction. A NO<sub>x</sub> reduction of 95 percent has been claimed on a 50 kw diesel engine. Work is continuing on a 100 kw diesel engine. A large scale test has been completed on a one megawatt (1340 bhp) diesel in Irvine, California, with a claimed NO<sub>x</sub> reduction of 98 percent. A Raprenox system is also being added to a 6 MW facility in Hawaii. The vendor has stated that this process can potentially improve engine efficiency, since the engine can be run at higher NO<sub>x</sub> levels. The Raprenox process is, however, dependent on exhaust temperatures and, therefore, may not be well suited for all engines.

SCR and NSCR control technologies are becoming commonly used by various source categories throughout urban areas in California. This is largely due to federal and local PSD and BACT requirements. The concentration limits in South Coast Rule 1110.2 are achieved in practice by natural gas and gasoline-fueled reciprocating IC engines. Although electrification is expensive (up to \$20,000 per ton reduced), some facilities may choose this control option.

### Emission Reductions Expected

In order to address uncertainty in the emission reductions that will result from implementing this control measure, low and high estimates were made. It was assumed that the NO<sub>x</sub> emissions from affected sources would be reduced by 70 to 90 percent.

The estimates below show the range of emission reductions achievable if the measure could be fully implemented in the corresponding year.

	<b>EMISSION REDUCTIONS</b>	
<i>Year</i>	<i>Low (TPD, Summer)</i>	<i>High (TPD, Summer)</i>
1994	6.31	8.11
1997	6.61	8.49
2000	6.90	8.87

### Costs of Control

Add-on controls will be required in order for natural gas and gasoline-fired IC engines to meet the proposed NO<sub>x</sub> limit. Highly effective post combustion controls will probably be demonstrated and available for diesel engines within five years. Data from SCAQMD puts the annual cost for NSCR at \$50 per horsepower and for SCR at \$100 per horsepower. A control technology supplier states that NSCR costs about \$100 per horsepower for 50-250 HP engines, \$66 per horsepower for 250-1200 HP engines and somewhat less for larger engines. This supplier also estimates the cost of SCR at \$100 per horsepower. At this time, cost figures for the Raprenox process are not available.

Cost-effectiveness estimates vary greatly depending on the actual load and hours of operation of the engine. Cost-effectiveness estimates have been calculated based on operations ranging from between 1000 to 8000 hours per year (depending on engine type and typical operations) and emission reductions of 93 percent to 97 percent from AP 42 emission factors. These costs are based on BAAQMD and SCAQMD calculations and supplier estimates.

	<b>Cost Summary</b>	
<u>Control Option</u>	<u>Total Annual \$ Cost/bhp</u>	<u>Cost Effectiveness \$/Ton</u>
SCR	100	\$2,600 - \$16,000
NSCR	50-100	\$1,000 - \$9,000

## Other Impacts

NO<sub>x</sub> reductions in general, including those associated with the proposed control measure, can cause localized increases in ozone concentrations.

The electrification option would create additional demand for electricity. Any additional electricity generated within the District would generate the pollutants associated with the type of electrical generating facility used. However, it is expected that there would be a net reduction in NO<sub>x</sub> emissions from current levels. CARB has estimated that a 100 horsepower reciprocating engine would emit 2.6 pounds of NO<sub>x</sub> per hour while an electric motor of 100 horsepower would cause the emission of 0.46 pounds of NO<sub>x</sub> per hour, at an uncontrolled power plant burning oil (CM D3 proposes significant NO<sub>x</sub> controls for electric power generating boilers). By comparison, a 100 horsepower IC engine meeting the proposed emission limits would emit 0.11 pounds of NO<sub>x</sub> per hour. With the electrification option, there will also be reductions in particulates, ROG, and CO emissions.

SCR and NSCR control technologies may create impacts from ammonia emissions. Ammonia is a toxic compound and its production, use, storage, and transport can be hazardous. Worker or public health could be impacted in the event of an accidental release or spill. Low level operating emissions from "ammonia slip" are possible, but would probably be insignificant. Some increase in truck traffic, and the associated vehicle emissions can be expected due to the delivery of raw ammonia.

The proposed control measure could adversely affect local water resources as a result of SCR and NSCR control technologies. For engines using fuels with a high sulfur content and having a high ammonia slip, the use of SCR for NO<sub>x</sub> removal may cause ammonium bisulfate and/or ammonium sulfate deposits to form downstream from the unit reactor, producing plugging and corrosion. These deposits are usually removed from the SCR system using water or steam soot blowing techniques. Catalyst regeneration through washing would create wastewater requiring proper handling and treatment to avoid contamination of water resources. The accidental release of ammonia could also adversely affect water quality.

Two types of solid waste would result from the proposed control measure: (1) The electrification option would result in the disposal of obsolete IC engines if they are not recycled and, (2) SCR catalysts have a lifespan of 2 to 7 years, depending on the type of fuel used, impurities in the fuel, and the NO<sub>x</sub> emission reduction efficiency required. If the spent catalyst is disposed of, several cubic yards of solid materials which may be considered hazardous, would require proper handling and disposal.

Impacts to soils could occur from removal of IC engines and their fuel supply systems. Fuel and lubricating oils may leak or spill during engine removal and result in soil contamination.

## References

CARB Proposed Strategy for the Control of Oxides of Nitrogen Emissions from Stationary Internal Combustion Engines, October 26, 1979.

SCAQMD Staff Report for Proposed Rule 1110.2 - Emissions From Gaseous- and Liquid-fueled Internal Combustion Engines, July 11, 1990.

SCAQMD Rule 1110.1 Emissions From Stationary Internal Combustion Engines, (Adopted October 26, 1984, Amended October 4, 1985).

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Ventura County APCD Rule 74.9 Stationary Internal Combustion Engines (Adopted 7/21/81, Revised 7/2/85, 9/5/89).

SCAQMD Rule 1110.2 Emissions From Gaseous- and Liquid-Fueled Internal Combustion Engines.

Houston Industrial Silencing, Letters to BAAQMD, dated January 16, 1991.

## **CM D2: CONTROL OF EMISSIONS FROM STATIONARY GAS TURBINES**

*(Adopted May 5, 1993)*

### **Background**

This control measure would reduce NO<sub>x</sub> emissions from stationary gas turbines by establishing stringent NO<sub>x</sub> standards for these sources. In most instances, the measure would require the installation of a selective catalytic reduction (SCR) system to meet the proposed NO<sub>x</sub> limits. It is anticipated that the control measure would affect gas turbines with an output of one-megawatt (MW) or greater.

Currently, about 10 to 20 such gas turbines are operating within the District. Most of these turbines have NO<sub>x</sub> controlled via steam or water injection, to 25 or 42 ppm @ 15 O<sub>2</sub>, averaged over any 3-hour period. This control measure would reduce NO<sub>x</sub> emission to specified levels, depending on turbine size. NO<sub>x</sub> would be reduced by steam or water injection and/or SCR, depending on the quantity of NO<sub>x</sub> to be reduced. Some peak-load turbines may reduce NO<sub>x</sub> emissions by methanol-fueling.

### **Regulatory History**

Currently, the District does not specifically regulate NO<sub>x</sub> emissions from existing gas turbines, although all stationary gas turbines need permits, except if they meet the requirements of Regulation 2-1-110.2 which excludes "any engine used solely as a standby source of motive power."

Most existing turbines are subject to the NSPS requirements found in CFR, Part 60, Chapter 1, Title 40, Subpart GG entitled "Standards of Performance for Stationary Gas Turbines," passed on 9/10/79 and amended on 2/14/89. These standards are included in the District's regulations by reference. The NO<sub>x</sub> limits established in this NSPS can be easily met with water or steam injection.

Currently, the most stringent District requirements for gas turbines are for new/modified units that are subject to the District's NSR Rule. Projects with NO<sub>x</sub> emissions which exceed 150 lb/day or 25 TPY (cumulative increase) must meet stringent BACT requirements.

The South Coast AQMD currently regulates the emissions from existing gas turbines under SCAQMD Rule 1134, which was adopted on August 4, 1989. The SCAQMD Rule establishes NO<sub>x</sub> limits which range from 9 to 25 ppm (measured by volume corrected to 15 percent oxygen on a dry basis and averaged over 15 minutes). The requirements are modified by an efficiency factor.

### **Emissions Subject to Control**

The affected source categories are *turbines* for gas and liquid fuels, *cogeneration -- turbines*, and *power plants -- turbines*. The projected NO<sub>x</sub> emissions subject to control are given below.

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<u>Year</u>	<u>Emissions Subject to Control (TPD, Summer)</u>
1994	10.3
1997	10.8
2000	11.3

## Proposed Method of Control

NO<sub>x</sub> limits similar to those specified in SCAQMD Rule 1134 are proposed for the Bay Area. The proposed NO<sub>x</sub> limits are listed below.

### PROPOSED NO<sub>x</sub> LIMITS FOR GAS TURBINES

<u>Unit Size</u>	
<u>Megawatt Rating</u>	<u>ppm (corrected to 15% O<sub>2</sub>)</u>
1 - 2.9 MW	25
2.9 - 9.9 MW	9
2.9 - 9.9 MW (no SCR)	15
10 MW and over	9
10 MW and over (no SCR)	12

Most turbines 10 MW and larger, will need an SCR system to meet the proposed NO<sub>x</sub> limits. For cogeneration units, the SCR catalyst bed is generally placed in the economizer section of the HRSG, where the optimum temperature window occurs. Ammonia is injected into the gas just prior to entering the catalyst, where a reaction occurs transforming NO<sub>x</sub> and NH<sub>3</sub> into N<sub>2</sub> and H<sub>2</sub>O. Ammonia, usually anhydrous, is stored on-site, near the turbine. Typical catalyst life is 2 to 7 years. Catalyst can periodically be "washed" to maintain needed removal efficiencies. It is expected that most installations that use SCR will also use water/steam injection to meet mandated NO<sub>x</sub> limits.

Small turbines, or those not equipped with SCR, will control NO<sub>x</sub> emissions via steam or water injection, or by methanol-fueling. Both of these controls act to reduce flame temperatures, resulting in lower NO<sub>x</sub> emissions. Methanol-fueling may be the most cost-effective control option for turbines which operate infrequently. These non-SCR measures have slightly less restrictive NO<sub>x</sub> limits, but may involve controls that are technology forcing.

## Emission Reductions Expected

In order to address uncertainty in the emission reductions that will result from implementing this control measure, low and high estimates were made. It was assumed that the average NO<sub>x</sub> emission reductions from cogeneration turbines would be 60 percent. Other gas turbines were assumed to have NO<sub>x</sub> reductions of 60 to 80 percent.

The estimates below show the range of emission reductions achievable if the measure could be fully implemented in the corresponding year:

<i>Year</i>	<b>EMISSION REDUCTIONS</b>	
	<i>Low (TPD, Summer)</i>	<i>High (TPD, Summer)</i>
1994	6.17	6.57
1997	6.49	6.90
2000	6.77	7.18

## Costs of Control

The costs of installing SCR are dependent on a number of factors including the size of the unit, the required abatement efficiency, and the hours of annual operation. Typical costs for a base-loaded, 25 MW turbine are roughly: \$4,000,000 installed equipment costs and \$500,000 annual operating costs. The cost-effectiveness in this example ranges from \$2000 to \$4000 per ton of NO<sub>x</sub> reduced, as indicated below.

<i>NO<sub>x</sub> EMISSIONS</i>	<i>% REDUCTION</i>	<i>ppm</i>	<i>COST (\$/TON)</i>
3300 lb/day	0	120-150	0
1100	70	42	\$4000
660	80	25	\$3000
330	90	9	\$2000

The cost-effectiveness of SCR is dramatically reduced for turbines that operate only occasionally. For peak-load turbines which operate less than 1000 hours per year, methanol-fueling will most likely be the most cost-effective control option.

Water/steam injection is much cheaper than SCR, but the NO<sub>x</sub> reductions are not as great. A level of 25 ppm NO<sub>x</sub> is all that can reasonably be expected from this control option in most cases. The costs of control using steam injection are essentially equal to the cost of generating the steam necessary to inject into the flame. For a 50 MW turbine, approximately 40,000 lb/hr steam are needed. The cost-effectiveness of water/steam injection is generally under \$2000 per ton of NO<sub>x</sub> reduced.

The average cost-effectiveness of this control measure is estimated to be about \$12,000 per ton of NO<sub>x</sub> reduced. Costs as high as \$15,000 per ton reduced may occur for turbines that are difficult to retrofit and that will be used minimally.

## Other Impacts

NO<sub>x</sub> reductions in general, including those associated with the proposed control measure, can cause localized increases in ozone concentrations.

The SCR process involves the use of ammonia. Ammonia is a toxic compound and its production, use, storage, and transport can be hazardous. Worker or public health could be impacted in the event of an accidental release or spill. Low level operating emissions from "ammonia slip" are possible (up to

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10 ppm), but would probably be insignificant. Some increase in truck traffic, and the associated vehicle emissions can be expected due to the delivery of raw ammonia.

The proposed control measure could adversely affect local water resources as a result of regenerating SCR catalysts. For engines using fuels with a high sulfur content and having a high ammonia slip, the use of SCR for NO<sub>x</sub> removal may cause ammonium bisulfate and/or ammonium sulfate deposits to form downstream from the unit reactor, producing plugging and corrosion. These deposits are usually removed from the SCR system using water or steam soot blowing techniques. Catalyst regeneration through washing would create wastewater requiring proper handling and treatment to avoid contamination of water resources. The accidental release of ammonia could also adversely affect water quality.

The proposed control measure would result in solid waste impacts from disposed SCR catalysts. These catalysts typically have a lifespan of 2 to 7 years, depending on the type of fuel used, impurities in the fuel, and the NO<sub>x</sub> emission reduction efficiency required. When the spent catalyst is disposed of, several cubic yards of solid materials which may be considered hazardous, would require proper handling and disposal.

Fairly substantial quantities of methanol may be needed for those turbines that use methanol-fueling to comply with the proposed control measure. Worker or public health could be impacted in the event of an accidental release or spill. Methanol's water solubility and lack of odor and taste could permit widespread pollution before a methanol spill is recognized. Methanol also burns with an invisible flame, making methanol flames dangerous and difficult to fight. A substantial increase in truck or rail traffic can be expected due to the delivery of methanol.

## References

SCAQMD Rule 1134: Emissions of oxides of Nitrogen from Stationary Turbines.

"Application of SCR to Gas Turbine Cogeneration Systems with Variable - Load Supplemental Firing," B. Bateman, BAAQMD, 1985.

Report on SCR for Gas Turbines, R. Pease, SCAQMD, 1984.

Staff Report on Proposed Rule 1134 - Emissions of Oxides of Nitrogen from Stationary Gas Turbines, SCAQMD, 1989.

## **CM D3: CONTROL OF EMISSIONS FROM ELECTRIC POWER GENERATING BOILERS**

*(Adopted February 16, 1994)*

### **Background**

This control measure would reduce NO<sub>x</sub> emissions from electric power generating boilers (or "utility" boilers) by establishing NO<sub>x</sub> standards for these sources. It is expected that, in most cases, the proposed NO<sub>x</sub> limits will be achieved by a combination of combustion modifications (e.g., staged combustion or low-NO<sub>x</sub> burners), and a post-combustion flue gas treatment method (e.g. selective catalytic reduction).

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Utility boilers are generally defined as those units having a fuel heat input rate of 250 MMBTU/hour or higher. There are currently 21 such utility boilers within the District, all operated by Pacific Gas and Electric Company (PG&E). Most, if not all, of the PG&E boilers have some degree of NO<sub>x</sub> controls installed to meet existing District regulations such as low excess air, overfire airports, and/or flue gas recirculation.

## Regulatory History

The EPA regulates new utility boilers under the New Source Performance Standards (NSPS), which apply to units for which construction commenced after 1971 (CFR Title 40, Chapter 1, Part 60, Subpart D) and after 1978 (Subpart Da). The NSPS limits NO<sub>x</sub> emissions to 0.3 lb/MMBtu heat input for oil-firing and 0.2 lb/MMBtu for gas-firing. The NSPS standards have been adopted by the District by reference.

District Regulation 9, Rule 3, is as or more stringent than the NSPS, namely 225 ppm NO<sub>x</sub> (about 0.3 lb/MMBtu) for oil-firing and 125 ppm NO<sub>x</sub> (about 0.15 lb/MMBtu) for gas-firing. All utility boilers within the District must have operating permits and meet the requirements of Rule 9-3.

The South Coast AQMD is proposing an amended Rule 1135 which will require increasingly stringent controlled NO<sub>x</sub> levels, on a sliding annual scale down to 0.20 lb NO<sub>x</sub>/Net MW-hr (about 0.022 lb/MMBtu) for all their District utility boilers by December 31, 1999, plus a total pounds-of-NO<sub>x</sub>-per-day cap for each utility company. The Ventura County APCD's proposed Rule 59 will limit NO<sub>x</sub> emissions to 0.10 to 0.20 lb NO<sub>x</sub>/Net MW-hr (about 0.011 to 0.022 lb/MMBtu). Depending on a particular boiler's current "baseline" emission levels, NO<sub>x</sub> reductions of approximately 75 to 95 percent will be required.

## Emissions Subject To Control

The affected source categories are *power plants -- boilers* for gas and oil fuels. The projected NO<sub>x</sub> emissions subject to control are given below.

<u>Year</u>	<u>Emissions Subject to Control (TPD, Summer)</u>
1994	13.4
1997	15.0
2000	17.9

## Proposed Method Of Control

Control technologies for NO<sub>x</sub> emissions fall into two general categories: (1) combustion modifications which limit the actual formation of NO<sub>x</sub> within the combustion chamber and, (2) flue gas treatment techniques which reduce NO<sub>x</sub> after it is formed but before it reaches the stack. In general, combustion modification (CM) controls work by reducing excess combustion air, lowering the peak flame temperatures of combustion, and/or reducing the oxygen available at the peak flame temperatures. These combustion modifications include low excess air (LEA); staged combustion, e.g., through the use of overfire airports (OFA); flue gas recirculation (FGR); and low-NO<sub>x</sub> burners (LNB). Expected NO<sub>x</sub> reduction capabilities of combustion modifications for oil and gas-fired boilers are listed below.

<b>NO<sub>x</sub> CONTROLS FOR UTILITY BOILERS</b>	
<i>CM Technique</i>	<i>% Reduction</i>
LEA	5-25
OFA	25-35
FGR	40-50
LNB	30-50
<i>Flue Gas Treatment</i>	
AI/UI	35-50
SCR	80-90

The actual NO<sub>x</sub> reductions achieved will be boiler-specific and be dependent on the fuel and fuel properties (e.g., the nitrogen content of the fuel oil). Furthermore, while these techniques are often sequentially applied in the order listed in the table above to achieve ever lower NO<sub>x</sub> emissions, the actual NO<sub>x</sub> emission reduction percentages are not additive.

Post-combustion flue gas treatment destroys the NO<sub>x</sub> after it is formed; these technologies include (1) selective non-catalytic reduction (SNCR), e.g., ammonia or urea (an ammonia-based chemical compound) injection and, (2) selective catalytic reduction (SCR). Both technologies lower NO<sub>x</sub> emissions by using a reducing agent, ammonia or urea, to reduce the NO<sub>x</sub> molecules to nitrogen and water. While combustion modification techniques are generally confined to relatively small hardware changes within the combustion furnace, the post-combustion flue gas treatment techniques, particularly SCR, require major hardware installations at the power boiler. So while ammonia/urea injection and SCR can achieve up to 50 percent and 90 percent NO<sub>x</sub> reduction, respectively, their complexities and operating costs are significantly higher than those of CM techniques.

The SNCR process selectively reduces NO<sub>x</sub> with injection of ammonia or urea into the flue gas at temperatures ranging from 1600°F to 1800°F without a catalyst. The SNCR method, while reducing NO<sub>x</sub> up to 50 percent, is very temperature sensitive and is limited to the temperature window indicated. Typically, the reducing agent is injected into the economizer section of the boiler. However, boiler-specific retrofit installation restraints may be encountered.

The SCR process uses a catalyst to lower the required temperature of NO<sub>x</sub> reduction to less than 800°F, achieving up to 90 percent NO<sub>x</sub> reduction. The SCR reactor is typically installed downstream of the boiler economizer and upstream from the air preheater.

The utility boilers operated within the District by PG&E generally have low excess air, overfire air and flue gas recirculation controls installed (mostly if not all retrofits) to meet existing District regulations. The next level of control would logically be the installation of low NO<sub>x</sub> burners. While no significant problems have been reported for gas-firing, there is concern about increased particulate emissions with oil-fired low NO<sub>x</sub> burners (these burners generally have dual-fuel capability). However, considering that any new NO<sub>x</sub> control measure will probably be gradually phased in, the latter should not be a problem for PG&E because it expects to phase out use of fuel oil and convert to all natural gas in their conventional fuel utility boilers by 1993.

The flue gas treatment techniques have on-going full-scale demonstrations in California, e.g., a urea injection system in a San Diego Gas & Electric Company oil- and gas-fired utility boiler and an SCR installation at a Southern California Edison unit. Although these flue gas NO<sub>x</sub> controls have not been

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extensively demonstrated on utility boilers in the United States, the technologies are being used successfully on dozens of units in Japan and Europe.

### Emission Reductions Expected

In order to address uncertainty in the emission reductions that will result from implementing this control measure, low and high estimates were made. It was assumed that the average NO<sub>x</sub> emission reductions from this control measure would be 80 to 90 percent.

The estimates below show the range of emission reductions achievable if the measure could be fully implemented in the corresponding year.

	<b>EMISSION REDUCTIONS</b>	
<i>Year</i>	<i>Low (TPD, Summer)</i>	<i>High (TPD, Summer)</i>
1994	10.8	12.1
1997	12.0	13.5
2000	14.3	16.1

### Costs of Control

The South Coast AQMD has estimated the following NO<sub>x</sub> control capital equipment costs:

<b>NO<sub>x</sub> TECHNIQUE</b>	<b>\$/KW INSTALLED</b>
OFA	1-2
FGR	10
LNB	30
AI/UI	10
SCR	30

Obviously, annual operating and maintenance costs need to be added on. The SCAQMD estimates the cost-effectiveness of combining combustion modification controls with SCR to be approximately \$4000 per ton of NO<sub>x</sub> reduced (1990 dollars). It should be noted that the figure is based on costs submitted by one vendor (Mitsubishi) and perhaps specified on one model boiler.

A more recent, detailed analysis by the Ventura County APCD indicates a cost-effectiveness range of \$9000 to \$18,000 per ton of NO<sub>x</sub> reduced (adjusted to 1990 dollars). PG&E has made a preliminary estimate that it would take approximately \$500,000,000 to install SCR on all their District boilers. Using this figure and assuming an annual operating and maintenance factor of 5 percent, the cost-effectiveness of an 80 to 90 percent NO<sub>x</sub> reduction is about \$16,000 per ton reduced (based on a capital recovery factor of 12.5 percent).

It should be noted that retrofit control costs are quite boiler specific and can range up to 100 percent higher than original engineering estimates. Furthermore, because a significant fraction of PG&E's boilers are over 30 years old, the capital recovery factor used above may have to be increased, thereby increasing the cost of control. Thus, while more detailed cost analyses will necessary, an average cost-effectiveness of about \$18,000 per ton of NO<sub>x</sub> reduced would appear to be reasonable. A utility-wide average NO<sub>x</sub> limit of 0.25 lb NO<sub>x</sub>/MW-hr should be achievable at that cost.

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## Other Impacts

Combustion modification NO<sub>x</sub> controls should not have any significant impacts on emissions of other pollutants or on boiler operation. NO<sub>x</sub> reductions in general, including those associated with the proposed control measure, can cause localized increases in ozone concentrations.

The SCR and ammonia injection processes involves the use of ammonia. Ammonia is a toxic compound and its production, use, storage, and transport can be hazardous. Worker or public health could be impacted in the event of an accidental release or spill. Low level operating emissions from "ammonia slip" are possible (up to 10 ppm), but would probably be insignificant. Some increase in truck traffic, and the associated vehicle emissions can be expected due to the delivery of raw ammonia. The accidental release of ammonia could also adversely affect water quality.

For boilers firing high sulfur oil, the ammonia-based flue gas treatment processes may produce ammonium bisulfate, a compound that can contribute to boiler economizer and/or air preheater fouling as well as increased particulate emissions. These deposits are usually removed from the SCR system using water or steam soot blowing techniques. This on-site catalyst regeneration could affect water resources, however, these problems should not develop because, as noted above, PG&E does not intend to burn high-sulfur oil.

The proposed control measure would result in solid waste impacts from disposed SCR catalysts. These catalysts typically have a lifespan of 2 to 7 years, depending on the type of fuel used, impurities in the fuel, and the NO<sub>x</sub> emission reduction efficiency required. When the spent catalyst is disposed of, several cubic yards of solid materials which may be considered hazardous, would require proper handling and disposal. Catalyst modules should, however, be regenerable by the manufacturer.

Because of the narrow and specific temperature window required with ammonia/urea injection, that technique may limit boiler load range capability. No such restriction is expected for SCR.

## References

Bisonett, G., Pacific Gas And Electric Company, personal communication with K. Lim, Bay Area Air Quality Management District, November 15, 1990.

Bay Area Air Quality Management District, Planning Division, 1987 Emissions Inventory.

Lim, K.J., *et al.*, "Environmental Assessment of Utility Boiler Combustion Modification NO<sub>x</sub> Control. Vol. I: Technical Results. Vol. II: Appendices," U. S. Environmental Protection Agency Publication EPA-600/7-80-075a & b, Research Triangle Park, NC., April 1980.

South Coast Air Quality Management District, "Proposed Amended Rule 1135 - Emissions of Oxides of Nitrogen from Electric Power-Generating Steam Boilers," Draft Staff Report, El Monte, CA, October 30, 1990.

Ventura County Air Pollution Control District, "Proposed Revision to Rule 59 - Electrical Power Generating Equipment - Oxides of Nitrogen Emissions," Staff Report, April, 1991.

Eskinazi, D., *et al.*, "Stationary Combustion NO<sub>x</sub> Control. A Summary of the 1989 EPRI-EPA Symposium," J. Air And Waste Management Association, Vol. 39, No. 8, pp. 1131-1139, August 1989.

Mckenzie, J.F., Pacific Gas And Electric Company, letter to M. Feldstein, Bay Area Air Quality Management District, February 5, 1990.

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Mckenzie, J.F., Pacific Gas And Electric Company, personal communication with K. Lim, Bay Area Air Quality Management District, May 10, 1991.

## **CM D4: CONTROL OF EMISSIONS FROM BOILERS, STEAM GENERATORS AND PROCESS HEATERS**

*(Adopted September 16, 1992)*

*(Refinery Boilers, Steam Generators and Process Heaters Adopted January 5, 1994)*

### **Background**

This control measure would reduce NO<sub>x</sub> emissions from industrial boilers, steam generators and process heaters by establishing NO<sub>x</sub> standards for these sources. In most instances, the proposed NO<sub>x</sub> limits are expected to be achieved with combustion modifications. The typical source would require low-NO<sub>x</sub> burners in combination with flue gas recirculation (FGR). It is anticipated that the control measure would affect sources rated 5 million (MM) BTU/hr or greater.

The facilities affected would be refineries, chemical plants and many other industrial, commercial and institutional facilities with combustion equipment used to produce steam or transfer heat to process streams (kilns and ovens are generally not considered "process heaters"). Most of the affected sources are currently equipped with conventional burners with NO<sub>x</sub> emission levels ranging from 100 ppm to 150 ppm.

### **Regulatory History**

Currently, the District does not specifically regulate NO<sub>x</sub> emissions from most existing boilers, steam generators or process heaters, except for very large units. District Regulation 9, Rule 3, has NO<sub>x</sub> emission limits of 125 ppm for gas-fired, and 225 ppm for oil-fired heat transfer operations with a maximum heat input of 250 MMBTU/hr or more. These standards apply to equipment permitted after April 19, 1975. Older units must meet NO<sub>x</sub> limits of 175 ppm and 300 ppm for gas and oil-firing, respectively, but only if the maximum heat input is 1.75 billion BTU/hr or more.

All fossil-fuel-fired steam generators for which construction is commenced after August 17, 1971, are also subject to the requirements set forth in the NSPS standards found in CFR, Part 60, Chapter 1, Title 40, Subpart Da which was passed on June 14, 1974, and amended on August 4, 1987. In addition, there is a Subpart Db which was passed on November 25, 1986 and amended on December 16, 1987, which covers industrial, commercial and institutional steam generating units.

Currently, the most stringent District requirements for boilers and other similar combustion sources are for new/modified units that are subject to the District's NSR Rule. Projects with NO<sub>x</sub> emissions which exceed 150 lb/day or 25 TPY (cumulative increase) must meet stringent BACT requirements.

All industrial boilers, steam generators and process heaters require permits except where they are fired exclusively on natural gas and/or liquefied petroleum gas, and are less than 10 MMBTU/hr firing capacity. Otherwise, the permit exemption is one million BTU/hr or less.

The South Coast AQMD currently regulates the emissions from industrial, institutional, and commercial boilers, steam generators, and process heaters under SCAQMD Rule 1146, which was adopted on September 9, 1988. The SCAQMD Rule establishes a NO<sub>x</sub> limit of 0.05 lb/MMBTU of

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heat input (40 ppm) for units rated 5 MMBTU/hr or greater and with an annual fuel usage greater than 9000 MMBTU/yr.

### Emissions Subject To Control

The affected source categories are *oil refineries -- external combustion* for refinery make gas, natural gas, liquid fuels, and solid fuels; and *other external combustion* for gas, oil and other fuels. The projected NO<sub>x</sub> emissions subject to control are given below.

Year	Emissions Subject to Control (TPD, Summer)
1994	47.6
1997	48.8
2000	49.9

### Proposed Method Of Control

NO<sub>x</sub> limits similar to those specified in SCAQMD Rule 1146 are proposed for the Bay Area. A general NO<sub>x</sub> limit of 30 ppm (0.036 lb/MMBTU) is proposed for equipment fired on natural gas/or LPG with a firing rate of 5 MMBTU/hr or greater. It is proposed that units fired on fuel oil meet a 40 ppm (0.048 lb/MMBTU) NO<sub>x</sub> limit. (The proposed concentration limits are at 3 percent oxygen, by volume).

The predominant control technology used to achieve the 30 ppm on gaseous fuels is expected to be state-of-the-art low-NO<sub>x</sub> burners in combination with FGR. In some cases, other combustion modifications such as low excess air or staged combustion (e.g., overfire airports) may also be necessary.

In certain instances, combustion modifications alone may not be adequate to meet the proposed NO<sub>x</sub> limit, and flue gas treatment may be necessary. Post-combustion flue gas treatment can be used to destroy NO<sub>x</sub> after it is formed; these technologies include (1) selective non-catalytic reduction (SNCR), e.g., ammonia or urea injection or (2) selective catalytic reduction (SCR). Both technologies lower NO<sub>x</sub> emissions by using a reducing agent, ammonia or urea, to reduce the NO<sub>x</sub> molecules to nitrogen and water. While ammonia/urea injection and SCR can achieve up to 50 percent and 90 percent NO<sub>x</sub> reduction, respectively, their complexities and operating costs are significantly higher than those of combustion modification techniques.

The SNCR process selectively reduces NO<sub>x</sub> with injection of ammonia or urea into the flue gas at temperatures ranging from 1600°F to 1800°F without a catalyst. The SNCR method, while reducing NO<sub>x</sub> up to 50 percent, is very temperature sensitive and is limited to the temperature window indicated. Typically, the reducing agent is injected into the economizer section of the boiler. However, boiler-specific retrofit installation restraints may be encountered.

SCR uses a catalyst to lower the required temperature of NO<sub>x</sub> reduction to less than 800°F, achieving up to 90 percent NO<sub>x</sub> reduction. The SCR reactor is typically installed downstream of the boiler economizer and upstream from the air preheater.

A compliance schedule based on boiler size is anticipated for this control measure. A low fuel-use exemption, and a provision allowing compliance to be demonstrated within a facility "bubble," will also be considered.

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## Emission Reductions Expected

In order to address uncertainty in the emission reductions that will result from implementing this control measure, low and high estimates were made. It was assumed that the NO<sub>x</sub> emissions from affected sources would be reduced by 70 to 80 percent.

The estimates below show the range of emission reductions achievable if the measure could be fully implemented in the corresponding year.

	<b>EMISSION REDUCTIONS</b>	
<i>Year</i>	<i>Low (TPD, Summer)</i>	<i>High (TPD, Summer)</i>
1994	33.3	38.1
1997	34.1	39.1
2000	34.9	39.9

## Costs of Control

The actual costs of control will be quite boiler specific. The SCAQMD has estimated that the cost-effectiveness of SCAQMD Rule 1146 ranges from \$2000 to \$19,000 per ton of NO<sub>x</sub> reduced, with average costs of \$6800 per ton of NO<sub>x</sub> reduced. SCAQMD Rule 1109, which covers refinery boilers and heaters is estimated to have an average cost-effectiveness of \$9000 per ton of NO<sub>x</sub> reduced. The cost to retrofit some older vintage boilers and boilers of atypical designs may be 2 to 3 times higher.

## Other Impacts

Combustion modification NO<sub>x</sub> controls should not have any significant impacts on emissions of other pollutants, or on combustion equipment operation. NO<sub>x</sub> reductions in general, including those associated with the proposed control measure, can cause localized increases in ozone concentrations.

Flue gas NO<sub>x</sub> controls will typically not be needed as a result of this control measure. When used, however, SCR and SNCR control technologies may create impacts from ammonia emissions. Ammonia is a toxic compound and its production, use, storage, and transport can be hazardous. Worker or public health could be impacted in the event of an accidental release or spill. Low level operating emissions from "ammonia slip" are possible (up to 10 ppm), but would probably be insignificant. Some increase in truck traffic, and the associated vehicle emissions can be expected due to the delivery of raw ammonia.

The proposed control measure could adversely affect local water resources as a result of regenerating SCR catalysts. For boilers using fuels with a high sulfur content and having a high ammonia slip, the use of SCR for NO<sub>x</sub> removal may cause ammonium bisulfate and/or ammonium sulfate deposits to form downstream from the unit reactor, producing plugging and corrosion. These deposits are usually removed from the SCR system using water or steam soot blowing techniques. Catalyst regeneration through washing would create wastewater requiring proper handling and treatment to avoid contamination of water resources.

## References

SCAQMD Rule 1146: Emissions of NO<sub>x</sub> from Industrial Boilers, Steam Generators and Process Heaters, October 1987.

## **CM D6: CONTROL OF EMISSIONS FROM GLASS MANUFACTURING PLANT MELTING FURNACES**

*(Adopted January 19, 1994)*

### **Background**

This control measure would reduce NO<sub>x</sub> emissions from container glass melting furnaces by establishing NO<sub>x</sub> standards for these sources. It is expected that the proposed NO<sub>x</sub>-limits can be met by combustion and process modifications.

There are five glass melting furnaces currently operating within the District. Three of these furnaces are operated by Owens-Brockway Glass Container, Inc. The other two furnaces are operated by Anchor Glass Container Corporation; one of these facilities is sited in Antioch, the other plant is located in Hayward. It is important to note that at least one of the five glass melting furnaces operating in the Bay Area currently complies with the emission limitation being considered.

### **Regulatory History**

Currently, the District does not specifically regulate NO<sub>x</sub> emissions from existing glass melting furnaces. The most stringent District requirements for furnaces and other combustion sources are for new/modified units that are subject to the District's NSR Rule. Projects with NO<sub>x</sub> emissions which exceed 150 lb/day or 25 TPY (cumulative increase) must meet stringent BACT requirements.

In 1980, CARB promulgated a Suggested Control Measure (SCM) for NO<sub>x</sub> emissions from glass melting furnaces. The SCM established an emission limit of 4.0 pounds of NO<sub>x</sub> per ton of glass pulled (withdrawn from the furnace). The South Coast AQMD adopted the SCM on February 5, 1982, in the form of a Demonstration Rule, SCAQMD Rule 1117. That rule was amended on January 6, 1984. The amended SCAQMD Rule 1117 specifies an emission limitation of 5.5 pounds of NO<sub>x</sub> per ton of glass pulled, effective January 1, 1988. The NO<sub>x</sub> limit drops to 4.0 pounds per ton of glass pulled, effective January 1, 1993.

During workshops held by the SCAQMD staff to formulate the regulatory limits and language, representatives for Brockway Glass stated that they could already meet a limitation of 4.0 pounds of NO<sub>x</sub> per ton of glass pulled.

### **Emissions Subject to Control**

The affected source category is *other external combustion -- natural gas*. Only a portion of the total emissions in this category are from glass melting furnaces. The projected NO<sub>x</sub> emissions subject to control are given below.

<u>Year</u>	<u>Emissions Subject to Control (TPD, Summer)</u>
1994	4.70
1997	5.02
2000	5.34

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## Proposed Method of Control

The NO<sub>x</sub> limit specified in SCAQMD Rule 1117 (4.0 lb/ton) is proposed for the Bay Area. It is expected that existing furnaces will use combustion and process modifications to meet the proposed standards.

The modifications that can be implemented to reduce NO<sub>x</sub> emissions from glass melting furnaces are listed below. A facility may choose to implement one or more of these options as necessary to achieve the required NO<sub>x</sub> reductions.

- (1) Increase the proportion of cullet (scrap glass) charged to the glass melting furnace.
- (2) Increase the electrical boost used to achieve and maintain the molten state of the mix. Electrical boosting can provide from 10 to 75 percent of the furnace's heat requirement.
- (3) Reduce the volume of excess air present for fuel combustion, thereby reducing the formation of NO<sub>x</sub>. Furnace operation at very low oxygen levels is best accomplished by continuous monitoring of flue gases, coupled with feedback to the inlet air controls.
- (4) Improve furnace insulation.
- (5) Briquetting and preheating of the feed mix will increase fuel efficiency, thereby reducing the NO<sub>x</sub> emissions.
- (6) Select a burner design which causes less NO<sub>x</sub> emissions.

Some of these control options have the potential for significant NO<sub>x</sub> reductions. The remaining options may be used to achieve smaller reductions, where the current emissions are close to the standard being proposed. Each plant would employ only those modifications most suited to their specific furnace, based upon the amount of reduction required to come into compliance.

If this control measure is adopted, some source operations are likely to be exempt from its requirements. Examples of possible exemptions include:

- (1) Flat glass melting furnaces.
- (2) Idling glass melting furnaces.
- (3) Furnaces used in the melting of glass for the production of fiberglass exclusively.
- (4) Glass remelt facilities using exclusively glass cullet, marbles, chips, or similar feedstock in lieu of basic glass-making raw materials.

## Emission Reductions Expected

In order to address uncertainty in the emission reductions that will result from implementing this control measure, low and high estimates were made. It was assumed that the average NO<sub>x</sub> emission reductions from this control measure would be 45 to 55 percent.

The estimates below show the range of emission reductions achievable if the measure could be fully implemented in the corresponding year.

	<b>EMISSION REDUCTIONS</b>	
<i>Year</i>	<i>Low (TPD, Summer)</i>	<i>High (TPD, Summer)</i>
1994	2.11	2.59
1997	2.26	2.76
2000	2.40	2.94

## **Costs of Control**

Information regarding the costs of control for this measure was taken from the staff report on the amended SCAQMD Rule 1117.

When the SCAQMD's Board of Directors considered reducing NO<sub>x</sub> emissions from glass melting furnaces as part of their 1982 AQMP, the process and combustion modifications proposed were estimated to cost \$3400 per ton of NO<sub>x</sub> reduced.

The Glass Packaging Institute commissioned the firm of Peat, Marwick, Mitchell and Company to prepare an economic analysis of the South Coast AQMD's proposal. The results of that study, completed in July 1983, estimated the cost to reduce NO<sub>x</sub> emissions to be \$5500 per ton reduced. That figure included capital costs, operating costs, maintenance costs, as well as the cost of obtaining money. The SCAQMD staff noted some discrepancies in the Peat, Marwick, Mitchell and Company report. These discrepancies lowered the reported cost for controlling emissions to less than \$4000 per ton of NO<sub>x</sub> reduced.

The overall cost-effectiveness of this control measure is estimated to be about \$4000 per ton of NO<sub>x</sub> reduced.

## **Other Impacts**

Furnace heating is normally accomplished using natural gas as the fuel. Use of electric boost for supplemental heating would increase demand for electric power generated at power plants. No adverse impacts on either water quality or solid waste disposal are expected as a result of this control measure.

## **References**

BAAQMD Source Test Report No. 91068, conducted October 16, 1990 at Owens-Brockway Glass Container, Inc. to determine the current level of NO<sub>x</sub> emissions from their three glass-melting furnaces.

SCAQMD Staff Report, Rule Development Division, 'Proposed Amended Rule 1117 - Emissions of Oxides of Nitrogen from Glass-Melting Furnaces', November 23, 1983.

SCAQMD Rule 1117, Adopted February 5, 1982, Amended January 6, 1984.

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## CM D7: CONTROL OF EMISSIONS FROM RESIDENTIAL WATER HEATING

(Adopted April 1, 1992)

### Background

This control measure would reduce NO<sub>x</sub> emissions from new gas-fired residential water heaters by establishing NO<sub>x</sub> emission standards for these sources. It is expected that the proposed NO<sub>x</sub> limits will be achieved by combustion modifications.

Residential water heaters are devices that heat water at a thermostatically-controlled temperature for delivery on demand. Combustion air is provided in a water heater by natural draft. The NO<sub>x</sub> emissions are functions of flame temperature and the combustion product cooling rate.

New water heaters sold in California currently must meet energy efficiency standards established by the California Energy Commission (CEC). In order to avoid penalizing energy efficient designs, emission standards for water heaters should be established on the basis of mass emissions per unit of useful heat output. This will allow a water heater to come into compliance either by reducing emissions per unit of energy input, increasing its efficiency, or both.

### Regulatory History

The District currently does not regulate NO<sub>x</sub> emissions from residential water heaters.

South Coast AQMD Rule 1121, which limits NO<sub>x</sub> emissions from new water heaters to 40 nanograms per joule of heat output, has been in effect since January 1, 1984. In addition, the SCAQMD proposed, in their 1989 AQMP revision (CM 88-D-5) to require the installation of solar water heating equipment in all new residential multi- and single-family homes over 2,000 square feet, and in all new commercial buildings. On an annual basis, it was estimated that this requirement would result in about 50 percent less energy usage (and NO<sub>x</sub> emissions) compared to conventional water heating systems. Other control technologies capable of achieving equivalent NO<sub>x</sub> emission reductions may alternatively be allowed.

### Emissions Subject To Control

The affected source category is *domestic water heating -- natural gas*. The projected NO<sub>x</sub> emissions subject to control are given below.

<u>Year</u>	<u>Emissions Subject to Control (TPD, Summer)</u>
1994	7.94
1997	8.15
2000	8.37

### Proposed Method Of Control

This control measure proposes to establish a 40 nanograms per joule (output) NO<sub>x</sub> limit for new residential hot water heaters, based on the existing SCAQMD Rule 1121. Combustion modification appears to be the only practical means of reducing NO<sub>x</sub> emissions from water heaters. A number of low-NO<sub>x</sub> burner designs capable of meeting the 40 nanograms per joule standard are currently commercially available.

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A demonstration program, supported by the SCAQMD, is currently underway to produce a commercially viable water heater capable of achieving NO<sub>x</sub> emissions of less than 10 nanograms per joule. Although commercial introduction is expected by late 1993, a number of technical difficulties first need to be resolved before these very low NO<sub>x</sub> levels can be specified.

The use of solar heating systems can reduce natural gas consumption and NO<sub>x</sub> emissions simultaneously. The equipment and installation costs for retrofitting existing homes with solar water heating systems are, however, unacceptably high (based on SCAQMD estimates, over \$300,000 per ton of NO<sub>x</sub> reduced). The costs of solar systems for new homes are lower; cost-effectiveness estimates cover a wide range depending on the assumptions made (based on SCAQMD estimates, cost-effectiveness ranges from a cost savings to costs of \$62,500 per ton of NO<sub>x</sub> reduced). The suitability of requiring solar water heating for new residential buildings may be further considered during the rule development process.

### **Emission Reductions Expected**

In order to address uncertainty in the emission reductions that will result from implementing this control measure, low and high estimates were made. It was assumed that the proposed 40 nanograms/joule NO<sub>x</sub> limit would reduce emissions from 40 to 50 percent.

The proposed control measure will apply only to new water heaters. Based on a useful water heater life of 10 years, the emissions subject to control are assumed to be 10 percent of the total category emissions in the first year of implementation (assumed here to be 1994). In successive years, the emissions subject to control are assumed to increase by an additional 10 percent per year, until all existing water heaters are replaced with complying units (in 10 years).

The estimates below show the range of emission reductions achievable if the measure could be fully implemented in the corresponding year.

<b>EMISSION REDUCTIONS</b>		
<i>Year</i>	<i>Low (TPD, Summer)</i>	<i>High (TPD, Summer)</i>
1994	.32	.40
1997	1.30	1.63
2000	2.34	2.92

### **Costs of Control**

Residential water heaters present a major technical challenge to cost-effective emission control because of their low unit price. At the proposed NO<sub>x</sub> limit of 40 nanograms per joule, the cost-effectiveness of this control measure is expected to be less than \$2000 per ton of NO<sub>x</sub> reduced.

### **Other Impacts**

No adverse environmental impacts are anticipated as a consequence of this control measure. The proposed NO<sub>x</sub> controls should not have any significant impacts on the emissions of other pollutants or on water heater performance. Improvements in energy efficiency would reduce natural gas consumption.

### **References**

South Coast Air Quality Management District, Control of Emissions from Residential and Commercial Water Heating, CM 88-D-5.

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## **CM D9: CONTROL OF EMISSIONS FROM RESIDENTIAL WOOD COMBUSTION**

*This Control Measure is no longer included as part of the CAP; however, this measure would be considered as part of future PM control strategies.*

### **Background**

This control measure would reduce emissions from domestic wood stoves and fireplaces by: (1) expanding public awareness programs, (2) requiring uncontrolled wood stoves to be removed or replaced by controlled stoves upon sale of real property, (3) placing restrictions on the sale and installation of used wood stoves, (4) accelerating the use of Phase II wood stoves, (5) possibly establishing a moisture content limit for "seasoned wood" and, (6) establishing a voluntary curtailment program (there is some overlap between this last measure and Control Measure G1, Citizen Postponement of Discretionary Activities). The control measure will primarily reduce the emissions of carbon monoxide (CO) and particulate matter (PM), although reactive hydrocarbon (ROG) emissions will be reduced as well.

Residential wood combustion sources include fireplaces and wood stoves (or heaters). Fireplaces are used for supplemental heating and for aesthetic effects. Fireplace combustion is characterized by high air-to-fuel ratios and burn rates. Traditional masonry fireplaces typically have large open fireboxes without combustion air controls. These fireplaces are usually inefficient heating devices -- during certain conditions, a net heat loss may occur in a residence as local radiant heat is offset by cold air drawn into the dwelling to replace air lost through the chimney draft.

Wood stoves are used primarily as domestic space heaters. Wood stoves have enclosed fireboxes and dampers to reduce air-to-fuel ratios and burn rates. Wood stoves typically have energy efficiencies ranging from 50 to 70 percent.

The emissions from residential fireplaces and wood stoves are highly variable depending on design characteristics, operating procedures and fuel properties. The emission factors given in EPA's AP-42 for conventional wood stoves are higher than those given for fireplaces by about 50 percent for PM and CO, and by over 200 percent for ROG (per ton of wood burned).

### **Regulatory History**

The District currently has no specific requirements that apply to residential wood combustion, except for the EPA's Standards of Performance for New Stationary Sources (NSPS) for residential wood heaters, which is adopted by reference in District Regulation 10. The NSPS requires that new residential wood heaters, sold after July 1, 1990, be certified to meet specific PM emission limits. More restrictive emission limits apply to units sold after July 1, 1992. While the EPA emission limits have been set only for PM, the emissions of other pollutants associated with incomplete combustion (e.g., CO and ROG) are reduced as well.

On November 8, 1989, the California Air Resources Board (ARB) approved a Suggested Control Measure (SCM) for the control of emissions from residential wood combustion. A number of control strategies are recommended for reducing emissions from fireplaces and wood stoves. Each of the control strategies recommended in the SCM have been adopted by one or more jurisdictions outside of California.

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## Emissions Subject to Control

The affected source categories are *fuels combustion, solid fuel -- wood stoves and fireplaces*. The projected emissions subject to control for fireplaces are given below. Emission estimates for wood stoves were not available, due to insufficient information. The emissions from fireplaces are, however, expected to be much greater than the emissions from wood stoves in the Bay Area. The CO emission estimates are for the winter planning period; the ROG emission estimates are for the summer planning period.

<u>Year</u>	<u>ROG Emissions. Subject to Control (TPD, Summer)</u>	<u>CO Emissions. Subject to Control (TPD, Winter)</u>
1994	3.6	340
1997	3.7	350
2000	3.9	360

## Proposed Method of Control

The control strategies recommended in the ARB's SCM are proposed for adoption in the Bay Area. Three of these measures are directed at accelerating the replacement of conventional wood stoves with units that have less polluting design features. Unfortunately, no similar proven emission control technologies currently exist for fireplaces. The SCM proposals are listed below.

### 1. Replacement of Non-Certified Wood Heaters Upon Sale of Real Property

This measure would require that, prior to the closing of escrow for any real property that contains a non-certified wood heater, the heater must be removed or made permanently inoperable, or be replaced or retrofitted with a certified unit. A program of this type is being implemented in Washoe County, Nevada.

Certified wood stoves include both catalytic and non-catalytic units. In laboratory conditions, certified wood stoves have been shown to have dramatically lower PM and CO emissions than conventional wood stoves. In "real-world" conditions the emission reductions are generally more modest, but still significant with average reductions ranging from 45 to 70 percent for PM and CO.

Certified wood stoves emit substantially less ROG than conventional units. ROG emission reductions from certified wood stoves are on the order of 80 to 90 percent.

### 2. Acceleration of Implementation Date for EPA's Phase II Emission Standards for the Sale of New Wood Heaters

EPA's Phase II NSPS for new wood heaters becomes effective on July 1, 1992. If a rule implementing this control measure occurs prior to this date, it would specify that only Phase II heaters be sold.

### 3. Restrictions on the Sale and Installation of Used Wood Heaters

The NSPS does not restrict the sale and installation of conventional used wood heaters. This proposal would ban the sale of uncertified operable wood heaters.

### 4. Public Awareness Program Encouraging Cleaner-Burning Practices

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Under this measure, wood heater retailers would be required to provide public awareness information with each retail sale of a solid fuel burning unit. This information would be in the form of pamphlets or brochures that describe the proper sizing, operation, maintenance, and fuel use for wood heaters, as well as information related to weatherization methods for the home and the health effects of wood smoke. This information is important, in that the emissions from wood burning devices can increase significantly when not used according to manufacturer's instructions.

5. Moisture Content Limit for "Seasoned Wood"

This measure would establish a moisture content limit of 20 percent by weight for firewood that is advertised to be "seasoned wood." The use of seasoned wood in fireplaces can reduce emissions by a factor of two.

6. Voluntary Curtailment -- "No Burn Days"

The District will request voluntary curtailment of residential wood burning during forecast air pollution episodes. This measure is described in more detail in the report for CM G1, Citizen Postponement of Discretionary Activities.

The effectiveness of a voluntary episode curtailment program is difficult to predict. A similar program implemented in Missoula, Montana was estimated to reduce residential wood burning emissions by 6 to 12 percent.

## Emission Reductions Expected

The emission reductions for this control measure have not been quantified at this time.

## Costs of Control

The requirements to replace conventional wood heaters with certified units is expected to result in a net cost savings. EPA estimates that the average price of a complying wood heater is \$120 to \$200 (1987 dollars) more than a conventional wood heater. The cost of retrofitting a conventional wood heater ranges from \$125 to \$250, according to ARB. Catalytic units also require catalyst replacement after about 10,000 hours of operation, at a cost of \$50 to \$75. In most cases, however, because these new heaters are more efficient than the models they replace, these excess costs will be recouped because of reduced fuel use. The ARB estimates that about \$70 per year would be saved, assuming an average wood consumption of 1.9 cords per year.

The wood burning curtailment program is also expected to have positive economic impacts. Natural gas is the primary fuel used for space heating in the Bay Area. Because the cost of natural gas is generally less than the cost of wood (on a BTU basis), a homeowner will benefit by using a gas furnace versus a wood stove. Because fireplaces are generally energy inefficient, the economic benefits of heating with gas versus burning wood in a fireplace are quite significant (unless a very inexpensive source of wood fuel exists).

Wood retailers that do not represent wood to be "seasoned" will not be subject to wood moisture limitations. ARB estimates the costs of wood moisture measuring devices to be about \$300.

The overall cost-effectiveness of this control measure has not been determined at this time.

## Other Impacts

No significant adverse environmental impacts are expected as a result of this control measure. In addition to reducing CO and ROG emissions, PM emissions will be reduced. Wood burning is

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believed to be a significant contributor to ambient PM<sub>10</sub> levels during episode conditions. PM emissions from wood burning can also cause public nuisance problems.

The emissions of polycyclic organic material (POM), a class of potentially toxic compounds some of which have been classified as probable human carcinogens, will be reduced as a result of the proposed control measure. The two primary contributors to ambient POM levels are mobile sources and residential wood combustion.

The accumulation of creosote in chimneys will be reduced by the replacement of conventional wood stoves with certified units. A 10 to 35 percent reduction in creosote accumulation has been observed with the use of certified wood stoves. Creosote deposition is the principal cause of chimney fires.

## References

A Proposed Suggested Control Measure for the Control of Emissions from Residential Wood Combustion, CARB, October 1989.

Evaluation of Low-Emission Wood Stoves, Shelton Research, Inc., Report to CARB, June 1986.

Particulate Emission from Residential Wood Combustion, Roy F. Weston Co., DOE/OR/21389-T8, 1988.

The Northeast Cooperative Woodstove Study, OMNI Environmental Services, Report to EPA, EPA/600/7-87/026a, Nov. 1987.

## F. OTHER STATIONARY SOURCE CONTROL MEASURES

### CM F1: IMPROVED NEW SOURCE REVIEW RULE

*(Adopted July 17, 1991)*

#### Background

The proposed amendments to the District's New Source Review (NSR) Rule, Regulation 2 Rule 2, are intended to make the permitting program comply with the no net increase requirement of the California Clean Air Act and Federal Law, as stated in the Code of Federal Regulations.

In order to assure that no net increase of any nonattainment pollutant or their precursors will occur, as the result of new permitting activities, it is proposed to reduce the BACT and offset thresholds to near zero for all new and modified sources of ozone precursors ROG and NO<sub>x</sub>, and carbon monoxide.

#### Regulatory History

The District adopted its first permitting regulation effective July 1, 1972. This regulation was modified in 1977 requiring the use of BACT for large new/modified sources.

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BACT is currently required for new/modified sources which, on any single day, emit more than 150 lb/day of precursor organic compounds, nitrogen oxides, sulfur dioxide, particulate matter, or more than 80 lb/day of PM<sub>10</sub>, or more than 550 lb/day of carbon monoxide.

BACT is also triggered when the cumulative emissions from new/modified sources at a facility exceed 25 tons/year for precursor organic compounds, nitrogen oxides, sulfur dioxide, particulate matter, or more than 15 tons/year of PM<sub>10</sub>, or more than 550 tons/year of carbon monoxide.

On May 21, 1980, the District amended the New Source Review Rule to require emission offsets be provided for cumulative emission increases of greater than 40 tons/year of ROG and 100 tons/year of NO<sub>x</sub>. These offset thresholds have rarely been exceeded due in part to the extensive use of BACT, but also due to their relatively high values.

The workshop process, required to consider amendments to the NSR rule, was begun in April of 1991. Final adoption of this control measure is expected to occur in July of 1991.

### **Emissions Subject To Control**

The affected emissions for this control measure have not been quantified at this time.

### **Proposed Method Of Control**

After adoption of this control measure, an applicant for almost any new or modified source must propose to utilize control technology which is judged to be "BACT" by the District before an Authority to Construct can be issued.

The District will prepare a comprehensive BACT list, similar to the one developed by the South Coast AQMD, which will be made part of the Manual of Procedures (MOP). This BACT document will be reviewed and revised as often as deemed necessary by the APCO, but not less than annually, in order to insure that the most effective control levels are required.

Offsets will also be required for most new or modified sources of ROG and NO<sub>x</sub>. The District staff will propose that offset ratios no longer be based on distance, but instead, be dependent on the magnitude of the total emission of a given pollutant from the facility.

### **Emission Reductions Expected**

The emission reductions for this control measure have not been quantified at this time.

### **Costs of Control**

The costs, related to the use of BACT and the requirement to provide offsets, are expected to vary greatly depending on the specifics of the source and the pollutant subject to control.

The District will consider cost-effectiveness and technological feasibility when determining BACT for all sources not previously subject to this requirement.

Offset costs are even harder to estimate at this time, due to their limited supply and availability. The burden of providing offsets is expected to be particularly difficult for "Greenfield" projects proposed by companies with no existing facilities in the District and for facilities with emissions less than ten tons per year. The District anticipates, however, that the cost of offsets will be a market driven commodity subject to the law of supply and demand.

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## Other Impacts

Except for relatively small emissions which may result due to the energy consumption of additional controls required by this measure, no adverse environmental impacts are expected as a result of the adoption of this control measure.

## References

California Clean Air Act Permitting Program Guidance for New and Modified Stationary Sources in Nonattainment Areas, California Air Resources Board, Stationary Source Division, dated July, 1990.

Staff Report, Proposed Amended Regulation XIII-New Source Review, South Coast AQMD, dated May 11, 1990.

Concepts of A No Net Increase Permit Program, by Peter Hess, dated September 17, 1990.

## CM F3(a): PROMOTION OF ENERGY EFFICIENCY

*This control measure implemented in 1997, denoted as part (a); 1997 CAP includes a new part (b).*

### Background

This control measure would establish a goal of increasing energy efficiency within the District by a specified amount. Unlike most other control measures, this one does not involve modifying an existing rule regarding emission control standards for specific equipment. Instead, it is more a conceptual approach at this time, first requiring review of many types of equipment used in residential, commercial and industrial settings. From this evaluation ("pre-rule") stage, individual rules can be developed afterward, for those types of equipment having the most promising emission reduction possibilities.

Energy needs and requirements in modern California society are ubiquitous: they are important elements in such varied products, functions and activities as personal and mass transit vehicles, residential ambient temperature control and lighting needs, industrial production operations and pollution abatement equipment. Consequently, the wide, general range of applicability of this control measure could result in a myriad of specific rules applicable to a multitude of specific applications.

State legislation currently provides for certain State agencies to have designated responsibilities to address California's energy needs and develop and implement energy efficiency standards. State legislation also has established the role of local air pollution control agencies in addressing the air quality problems in the parts of the State where they have jurisdiction. There is not yet established an integrated State-wide approach to deal with energy needs, energy efficiency standards, and air quality issues in a unified manner. On the local level, however, progress has been made in this area by the South Coast Air Quality Management District (SCAQMD).

Recognizing the time-consuming, technically-complex and jurisdictionally-interlocking nature of the issues faced, that agency established, more than a year ago (around August, 1989) an Energy Working Group (EWG). The objectives of the EWG are: (1) to examine the energy-related issues raised in the Air Quality Management Plan which the SCAQMD adopted earlier that year, (2) to establish technical consensus on solutions to energy-related air quality problems and, (3) to provide input to the 1991 Air Quality Plan, required under the California Clean Air Act. The EWG consists of a Steering Committee

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and four Subgroups. It was understood that achieving these objectives required, in order to develop needed policy decisions, the involvement of certain other agencies at the highest level. Therefore, the Steering Committee was established with membership consisting of a board member or commissioner and the executive officer of the following public agencies:

- California Air Resources Board (CARB)
- California Energy Commission (CEC)
- California Public Utilities Commission (PUC)
- SCAQMD
- Southern California Association of Governments (SCAG)

The four subgroups are:

- Electricity Demand and Supply
- Stationary Source Fuel Use and Availability
- Transportation Fuel Use and Availability
- Energy Conservation

The functions of the Steering Committee are to establish policy guidance, determine the need for technical analysis, select Subgroup membership and workplans, and make recommendations to the constituent agencies. Consequently, recommendations consider the statutory authority of each of the member agencies.

## **Regulatory History**

Under the California Clean Air Act enacted by the State legislature, the Bay Area Air Quality Management District (BAAQMD) has authority to develop, adopt and enforce emission control regulations relating to attainment and maintenance of State ambient air quality standards. The Act also provides the BAAQMD with authority to develop indirect source control programs as part of the 1991 Clean Air Plan. Independently, State legislation provides the PUC (essentially a regulatory implementing agency) with authority to set rates that privately owned utilities may charge, oversee their operations and decide the amount, type and time when new energy resources will be built by the utilities. State legislation also provides the CEC (essentially a planning agency) with authority to forecast energy demand and conservation potential, determine existing supply, recommend energy policies to the PUC including siting locations for new facilities, and develop and implement building and appliance efficiency standards.

Consequently, the multi-agency jurisdictional nature of the subject control measure is evident.

## **Emissions Subject to Control**

Most stationary source combustion categories including *power plants* could be affected by this control measure. The affected emissions for this control measure have not, however, been quantified at this time.

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## **Proposed Method of Control**

At this time, the control measure is in the "pre-rule" stage and so the proposed method of control cannot be determined. In reality, many more than a single method of control may be the ultimate outcome. First, further effort by the BAAQMD, along the lines of the SCAQMD, would be needed, including analysis of the multitude of products, functions and activities with an energy component. From this, a "control measure sub-set" of measures could be developed, each addressing the promotion of energy efficiency for the specific product, function or activity covered. Preparation work for each such "sub-set" measure could include estimation of potential effectiveness and control costs.

The global environmental impact of the thrust of this control measure may be an element in any further work on it. It was noted by the Executive Officer of the SCAQMD that though carbon dioxide is not a regulated pollutant, that agency is examining the potential impacts of the air quality plan on its production.

It has been suggested that air impact fees for indirect sources (IS) is an approach that might be instituted by a government agency to whom the District grants authority to administer an IS program. The purpose would be, for example, to provide an incentive for the sponsor of a development project to produce a project that is beneficial to the ambient air environment. There may be areas that the District itself can use fees to encourage the use of energy efficient equipment, though this may require legislative changes.

For example, the District might, for every permit application or only those which meet specified parameter threshold values, require that fuel- or energy-using devices (i.e., those devices burning fuel at the plant site or using electricity) be evaluated for energy efficiency. A permit fee schedule tailored to energy efficiency could possibly be established, with lowered fees established for the more energy-efficient devices. One approach would be to adopt a simple "BTU-tax" on all energy consuming sources, which would encourage the use of energy efficient equipment. If this could be done, the District might be among the first in the nation to employ such a tactic.

## **Emission Reductions Expected**

The emission reductions for this control measure have not been quantified at this time.

## **Costs of Control**

The costs of this control measure have not been quantified at this time. They would depend on each specific "sub-set" measure developed.

## **Other Impacts**

It is not possible to determine, at this time, whether there may be unexpected adverse impacts from this control measure. At first glance, however, it does not appear that there would be any resulting from the development of any specific "sub-set" measure. However, there may be institutional and societal resistance to non-traditional control measures proposed to be undertaken by the District, especially where legislative authority is now lacking and would need to be obtained. State agencies with more established legislative authority, in these areas, might be able to implement the desired programs or work with jointly with the District in this regard.

The obvious positive impacts of this control measure are the savings in energy, particularly the reductions in fossil fuel use.

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## References

- "Energy Efficiency as a Coordinated Environmental and Energy Strategy, Draft Phase I Report: Defining the Issues and Problems," Joint Committee on Energy Regulation and the Environment, April, 1990, pp. ii-1, ii-2.
- "Energy Working Group Report," Staff Draft, prepared around September, 1990.
- "Indirect Source Control Program," Issue Paper # 5 (Draft, 'Bay Area '91 Clean Air Plan (CAP)', BAAQMD), October, 1990.
- "Increasing Energy Efficiency to Improve Air Quality," Remarks to the California Legislature Joint Committee on Energy Regulation and the Environment," October 1, 1990.
- "Planning the Management of Global Air Pollution Issues - A Strategy for Air Pollution Control Agency Action," Presentation at the Air and Waste Management Association's 82nd Annual Meeting, Paper 89-39.7, June, 1989.

## CM F4: ENHANCED ENFORCEMENT OF EXISTING REGULATIONS

*Adopted as part of various regulatory efforts, 1991 - 1997*

### Background

This control measure would reduce emissions by improving enforcement practices which will lead to lower rates of non-compliance. This control measure could potentially be directed at any existing regulation. Because the District is classified as non-attainment for ozone ambient air quality standards, and the District's control strategy has primarily been focused on control of emissions of precursor organic compounds, the focus of this control measure would be those sources affected by rules in the District's Regulation 8.

The success of any regulation depends on the degree to which affected sources are able and are willing to comply. Many Regulation 8 rules require business decisions about the use of new, often more expensive materials (such as coatings and solvents), the installation of technologically advanced equipment designed to reduce emissions (such as zero gap tank seals), and the possible installation of abatement equipment or improvement in operating practices. Enforcement of these regulations and the community perception that enforcement is consistent and pro-active constitutes a powerful incentive to drive these business decisions in favor of compliance.

### Regulatory History

Many of the Regulation 8 rules were based on EPA Control Technique Guidelines (CTGs), published in the late 1970s and early 1980s. The CTGs typically set limits for industrial processes but did not specify methods of enforcement to ensure compliance with regulations. In 1981, the District's Enforcement Division developed a Regulation 8 Enforcement Strategy delineating the responsibilities of different District divisions for compliance determinations. In 1987, the California Air Resources Board Compliance Division conducted an audit of District programs and came up with a list of recommendations, some of which were already scheduled for implementation, to improve enforcement of District rules.

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In 1988, upon the expiration of the 1977 amendments to the Clean Air Act, the EPA required the District to amend many Regulation 8 rules to conform them to EPA policy. These policies were outlined in "Issues Relating to VOC Regulation - Cutpoints, Deficiencies and Deviations," published on May 25, 1988. Issues directly relating to enforcement included the need for appropriate recordkeeping and the need to cite test methodology appropriate to the standards. In 1989, the EPA and the ARB published a "Phase III" Rule Effectiveness study conducted throughout California on the compliance status of the aerospace industry, and is currently finalizing another one for the can and coil industry. The aerospace study cited shortfalls in the intended emissions reductions due to violations, variances, improperly granted or implemented Alternate Emissions Control Plans, rule relaxations, and underestimated growth and baseline emissions errors (although the successful implementation of the rule arguably has nothing to do with baseline emission error or underestimated growth).

The District's Emissions Inventory calculates the achieved emissions reductions for source categories, and hence progress toward attainment based on how effective (on a percentage basis) a rule is, which, in turn, is largely dependent on the effectiveness of the enforcement of the rule.

### **Emissions Subject to Control**

The affected emissions for this control measure have not been quantified at this time.

### **Proposed Method of Control**

Methods of control could be widely variable under this measure. Several options are discussed below.

#### *Option #1: Rule Development*

This option would provide for increased accountability by affected sources subject to a given rule. Examples include recordkeeping requirements, emissions monitoring requirements, data reporting requirements, violation self reporting requirements and operations and maintenance plan requirements. This option could be implemented in the normal course of rule development.

#### *Option #2: Restructuring Enforcement Staff Activities*

This option would provide for more effective use of existing enforcement staff by concentrating activities on sources likely to be in violation. This has precedent in the newly implemented gasoline facility HIT program, increasing inspection frequencies for sources found to be in violation and decreasing frequencies for sources found to be in compliance. Another strategy would be to schedule inspection activity for major emissions sources just prior to or during ozone season to increase the likelihood of curtailing violations during this period.

#### *Option #3: Enforcement Audits*

This option would enhance options #1 and #2. District staff is currently conducting a field audit of organic liquids storage tanks similar to the audits conducted on the aerospace and can and coil industries. The results of this audit are expected to feed directly into pending amendments to Regulation 8, Rule 5, and may also dictate inspection policy for these sources. In some cases, an audit might consist of information requests from affected sources coupled with field inspection activity. An audit might be better conducted by an outside contractor using established parameters rather than existing enforcement staff.

#### *Option #4: Increased Surveillance*

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This option would require an increase in enforcement staff, which would result in a greater inspection frequency for each source. As with option #2, this would increase the likelihood of uncovering and curtailing emissions within a shorter time period from their initial occurrence.

*Option #5: Increased Penalties for Non-compliance*

This option would attempt to deter conscious violations of District regulations through mandating higher penalties for violations. The California Health and Safety Code sets maximum penalties for violations; State legislative action would be required to increase these amounts. The District currently sets penalties under mutual settlement guidelines, the amount could possibly be adjusted according to emissions related severity of the violation.

*Option #6: Increased Public Awareness of Standards*

This option would attempt to make affected industry and/or the public aware of the standards of a particular regulation and how best to achieve compliance. The District has sent advisories to affected sources regarding upcoming compliance dates for many years and has recently implemented an informational brochure program on various aspects of District concerns. Enforcement personnel could develop mailing lists of affected industries and follow up with advisories to track effective dates promulgated by regulatory changes.

## **Emission Reductions Expected**

Emissions reductions would come from lower rates of non-compliance, but are not possible to quantify at this time.

## **Costs of Controls**

Costs would vary with options and, again would be difficult to quantify, although costs could be quantified on a program by program basis. The costs of each option are discussed below.

Option #1: The costs would be borne by affected industry. Costs would include extra labor to comply with recordkeeping requirements and, in the case of monitoring equipment, capital and operating costs.

Option #2: The cost could be negligible, as the option would result in a more efficient use of staff, however staff time would be required to set up each program and monitor the results to quantify emissions reductions.

Option #3: The cost would be minimal, but would require some additional staff time to implement.

Option #4: This would result in the greatest additional cost to the District. The effectiveness of an across the board staff increase without concurrent implementation of option #3 would be directly proportional to ratio of new to existing inspection staff.

Option #5: This would be a direct cost to affected industry. Costs to the District could increase as increased penalties would provide an incentive to litigate settlements.

Option #6: The cost would be similar to option #3, again depending on the how in-depth a program would be implemented.

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## Other Impacts

No adverse environmental impacts are expected as a result of this control measure. Reductions in the emissions of toxic air contaminants are likely to result due to increased compliance.

## References

1981 Regulation 8 Enforcement Strategy, BAAQMD, R. Matson

"Phase III Rule Effectiveness Study for the Aerospace Industry," EPA, ARB

"Phase III Rule Effectiveness Study for the Can and Coil Industry," Draft Workplan, EPA, ARB.

## G. INTERMITTENT CONTROL MEASURES

### CM G1: CITIZEN POSTPONEMENT OF DISCRETIONARY ACTIVITIES

*Program implemented as "Spare the Air" program, September, 1991*

#### Background

This control measure would involve the voluntary curtailment or postponement of certain activities by the general public on forecast ozone exceedance days.

This control measure would affect the usage of several mobile and areawide emission sources. These sources include architectural coatings, off-road motorcycles, internal combustion lawn and garden equipment, motorized pleasure boats, and certain consumer products such as charcoal lighter fluid, pesticides, and aerosol products. The control measure will principally reduce emissions of organic compounds (ROG), although reductions of nitrogen oxides (NO<sub>x</sub>) and carbon monoxide (CO) emissions from combustion sources, including the affected mobile sources, will also occur. The measure could also be applied to fireplace usage during forecast CO excess days during the winter.

Potential emission reductions associated with decreased on-road motor vehicle usage have been included in TCM 23.

#### Regulatory History

The voluntary curtailment or postponement of certain activities by the general public on forecast ozone exceedance days has not been previously pursued by the District. District Regulation 4, Air Pollution Episode Plan, does describe abatement actions and strategies that are implemented when defined episode levels are forecast. These defined episode levels are much greater than the ambient air quality standards. The proposed control measure would be implemented when ozone levels are forecast to exceed the State ambient ozone standard of 0.09 ppm.

The District has not experienced any Stage I advisory alert episode ozone levels since 1983. However, when these levels were experienced, procedures were implemented to notify the general public through the media about the episode and what precautionary actions should be taken. These actions included the curtailment of school athletic activities, unnecessary driving, strenuous exercise, etc. These

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advisories also encouraged particularly susceptible people, such as those with chronic lung diseases, to stay indoors.

The Ventura County Air Pollution Control District included a similar type of control measure in their 1979 Air Quality Management Plan. The measure was somewhat more encompassing in that it included the voluntary postponement of the agricultural application of pesticides. The program designed to implement the Ventura measure was terminated after a brief implementation period. The principal reasons for its termination were the lack of data to measure program effectiveness, and the fact that EPA could not approve any emission reduction credit for the measure as part of an attainment strategy because the program was voluntary, intermittent, and not legally enforceable.

The emission source categories affected by the measure are generally controlled through other District regulations, or through current or future CARB emission standards for vehicular sources. For example, the organic content of architectural coatings is limited by District Regulation 8, Rule 3. Similarly, emission standards for new vehicles and engines are specified by CARB.

### **Emissions Subject to Control**

A number of source categories are affected including most solvent-based structures coating and cleanup categories, certain consumer products categories (e.g. *hair spray -- aerosol*), *lawn and garden and other utility equipment*, *recreational boats* and *off-road motorcycles*. The projected ROG and NO<sub>x</sub> emissions subject to control are given below. It should be noted that there may be significant overlap between this control measure and others being proposed. The emissions subject to control given below only incorporate the effectiveness of control measures already adopted. The emissions from some of the affected source categories are expected to decrease over time due to implementation of new control measures.

<b>EMISSION REDUCTIONS</b>		
<i>Year</i>	<i>Control ROG (TPD, Summer)</i>	<i>Control NO<sub>x</sub> (TPD, Summer)</i>
1994	75.7	4.65
1997	76.1	4.80
2000	76.3	4.95

### **Proposed Method of Control**

On days when ozone concentrations are forecast to reach 0.09 ppm, an advisory would be issued to the print and electronic media. Forecasts are made a day in advance. That is, today's forecast would be for tomorrow. The advisory would indicate that ozone levels are predicted to exceed the level of the ambient standard and would ask the general public to postpone certain activities on the day the ozone level is predicted to exceed the State ambient ozone standard.

Specifically, the general public would be asked not to apply solvent-based architectural coatings (both indoors and outdoors), not to use off-road motorcycles or other types of recreational off-road vehicles, not to mow their lawns or use other types of internal combustion garden equipment, not to use motorized pleasure boats, and not to use pesticides, charcoal lighter fluid and possibly other specified consumer products.

This control measure could be implemented within a three to six month timeframe. This time would be needed to design the specific implementation program and to enhance media contacts. Public information materials explaining the citizen postponement program would also be developed.

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## Emission Reductions Expected

The extent to which the affected activities will actually be postponed by the measure can only be estimated in crude terms. In addition, if the activities are postponed rather than replaced with less polluting alternatives or totally abandoned, then no permanent emission reductions would be realized. Temporary emission reductions will be realized to the extent that activities are postponed.

In order to address uncertainty in the emission reductions that will result from implementing this control measure, low and high estimates were made. It was assumed that the ROG and NO<sub>x</sub> emissions from most affected sources would be reduced by 10 to 20 percent during an advisory. The ROG emissions from aerosol products use were assumed to be reduced by 5 to 10 percent.

Year	ROG REDUCTIONS (SUMMER)		NO <sub>x</sub> REDUCTIONS (SUMMER)	
	<i>Emission Reduced</i>		<i>Emission Reduced</i>	
	<i>Low (TPD)</i>	<i>High (TPD)</i>	<i>Low (TPD)</i>	<i>High (TPD)</i>
1994	6.46	12.9	.47	.93
1997	6.48	13.0	.48	.96
2000	6.52	13.0	.50	.99

## Costs of Control

There are really no costs associated with this control measure in the traditional sense of control costs. There will be costs associated with designing and implementing the program, although these costs are not expected to be great and most likely will be absorbed with existing District staffing and funding resources.

There are no direct capital or operating/maintenance costs associated with this measure. Estimating these cost savings would be speculative at best, particularly in light of the uncertain degree of postponement that will be realized.

## Other Impacts

Energy savings would result from reduced vehicular use (off-road), reduced use of motorized pleasure boats, and reduced use of lawn and garden equipment. This energy savings would only be realized when the activity was forgone rather than postponed.

## References

None.

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## CM G2: INDUSTRIAL POSTPONEMENT OF ACTIVITIES DURING FORECAST OZONE EXCESS DAYS

*Incorporated with CM G1 as "Spare the Air" program, September 1991 and "BayCAP", 1996.*

### Background

This control measure would affect specific, non-production related, industrial operations when the District predicts excesses of the State ozone air quality standard. These operations include: industrial maintenance coating, uncontrolled soil aeration, repairs of external floating roof seals, uncontrolled cleaning of storage tanks, marine tank vessels and tank cars, process vessel depressurization, fuel oil usage, and check out of stand-by engines. Industrial facilities will also be asked to voluntarily reduce the emissions from all other operations to the maximum extent feasible during these episode conditions.

The control measure will principally reduce emissions of organic compounds (ROG), although reductions of nitrogen oxides (NO<sub>x</sub>) and carbon monoxide (CO) emissions from combustion sources will also occur.

### Regulatory History

The mandatory curtailment or postponement of certain activities by the general public, industry or agricultural operations has a basis in District Regulation 5, Open Burning, and Regulation 4, Air Pollution Episode Plans. Agricultural open burning is curtailed during days when the District anticipates poor ventilation which could lead to excessive pollution concentrations. The ambient levels of air contaminants which would trigger the action levels for industrial curtailment included in Regulation 4 have not been experienced since 1983.

In addition, District Regulation 8, Rule 44, includes an ozone day excess prohibition for marine vessel loading operations. This provision is applicable to loading operations until mandated vapor recovery systems have been installed.

### Emissions Subject to Control

A number of source categories are affected including most solvent-based industrial maintenance coatings categories, certain storage tank categories, *marine vessel cleaning & gas freeing, refinery vessel depressurization, and reciprocating engines*. The projected ROG and NO<sub>x</sub> emissions subject to control are given below. It should be noted that there may be significant overlap between this control measure and others being proposed. The emissions subject to control given below only incorporate the effectiveness of control measures already adopted. The emissions from some of the affected source categories are expected to decrease over time due to implementation of new control measures.

Year	Emission Subject To Control	
	Control ROG (TPD, Summer)	Control NO <sub>x</sub> (TPD, Summer)
1994	4.49	.12
1997	4.60	.13
2000	4.71	.14

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## Proposed Method of Control

On days when the District predicts an excess of the State ozone AAQS, an advisory would be issued to the print and electronic media. Because forecasts are made a day in advance, industry would be able to adjust their schedules to defer the operation of subject sources. Special phone lines would be dedicated to those industries wishing to call the District. Another option would be for the staff to contact specific industries and advise them of the need to curtail operations. It is expected that, at least initially, this measure would only affect non-production related activities within those affected facilities. A regulation would be prepared to require affected industries to prepare a notification and deferred operations plan. Sources under permits would be conditioned.

## Emission Reductions Expected

The extent to which emissions are reduced is limited by the compliance rate. In addition, if the activities are postponed rather than replaced with less polluting alternatives or totally abandoned, then no permanent emission reductions would be realized. Temporary emission reductions will be realized to the extent that activities are postponed.

In order to address uncertainty in the emission reductions that will result from implementing this control measure, low and high estimates were made. It was assumed that an 80 to 90 percent compliance rate would occur during an advisory.

The estimates below show the range of emission reductions achievable if the measure could be fully implemented in the corresponding year.

Year	ROG REDUCTIONS (SUMMER)		NO <sub>x</sub> REDUCTIONS (SUMMER)	
	<i>Emission Reduced</i>		<i>Emission Reduced</i>	
	Low (TPD)	High (TPD)	Low (TPD)	High (TPD)
1994	3.59	4.04	.10	.11
1997	3.68	4.14	.10	.12
2000	3.77	4.24	.11	.12

## Costs of Control

As proposed, there would be no real identified costs to the affected industries. There will be costs to implement the measure both to the District and affected industries. The use of advanced electronic communication equipment (transmitter - receiver) will minimize costs. Industrial costs for overhead may be \$2,000 per facility per year. District implementation costs would be \$200,000 per year to be shared with a voluntary program. Costs would be for the overhead for plan review and notification equipment.

The cost-effectiveness of this control measure has not been quantified at this time.

## Other Impacts

No adverse environmental impacts are anticipated as a result of this control measure.

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## References

Federal Register; Vol. 51, No. 63, April 2, 1986; Dispersion Techniques Implemented Before Enactment of the Clean Air Act Amendments of 1970.

Hess, P.F., Position Paper - Prohibitive Day Control Measures, BAAQMD, May 8, 1986.

## H. MOTOR VEHICLES

### CM H1: SMOKING VEHICLE PROGRAM

*(Program implemented as of November, 1992)*

#### Background

This control measure would reduce ROG and NO<sub>x</sub> emissions from on-road vehicles by establishing a citizen complaint program for smoking vehicles.

#### Regulatory History

The District currently does not have a specific public complaint program for smoking vehicles. The District had operated a vehicle patrol system, which was deactivated due to budget cutbacks. The program used uniformed District staff to pull over vehicles and cite violators for excessive emissions under the California Vehicle Code. The California Highway Patrol (CHP) currently has the authority to enforce visible emissions standards for vehicles, although the CHP's effectiveness in this area appears to be rather limited.

The South Coast AQMD currently has three smoking vehicle enforcement programs: (1) a public complaint program, (2) a SCAQMD-CHP vehicle patrol program and, (3) a smoking bus program.

#### Emissions Subject To Control

The affected source categories are tailpipe emissions for various types of on-road vehicles. Only a portion of the emissions in these categories (i.e. 2 percent) were assumed to be affected by this control measure. The projected ROG and NO<sub>x</sub> emissions subject to control are given below.

Year	<i>Emission Subject To Control</i>	
	<i>ROG (TPD, Summer)</i>	<i>NO<sub>x</sub> (TPD, Summer)</i>
1994	2.44	4.94
1997	2.00	4.42
2000	1.61	4.02

#### Proposed Method Of Control

In order to implement a smoking vehicle complaint program, the District would obtain and publicize a special toll-free phone number for smoking vehicle complaints. The telephone number for the South Coast AQMD's program is 1-800-CUT-SMOG. The District would develop a special report form to

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record vehicle complaint information. The program would be facilitated by a computer link-up with the Department of Motor Vehicles in order to verify the accuracy of information and obtain the smoking vehicle owner's name and address.

After sorting and verifying the complaint information for accuracy, the complaints would result in letters being sent to registered owners. Compliance would be voluntary, although enforcement action could be initiated by the District or through local law enforcement agencies when warranted, or as a phased in program where increased stringency was desired.

### **Emission Reductions Expected**

It was assumed that the ROG and NO<sub>x</sub> emissions from affected vehicles would be reduced by an average of 3 to 6 percent, for a voluntary repair program, depending on vehicle type.

The estimates below show the emission reductions achievable if the measure could be fully implemented in the corresponding year.

	<i>ROG Reductions</i>	<i>NO<sub>x</sub> Reductions</i>
<i>Year</i>	<i>(TPD, Summer)</i>	<i>(TPD, Summer)</i>
1994	.08	.20
1997	.07	.18
2000	.06	.17

### **Costs of Control**

The costs of this control measure would largely be related to the costs of repairing or replacing smoking vehicles. It is expected that older vehicles, which are not subject to the Smog Check program, will be the most common offenders. The program would also require a minimum of four additional District staff.

The cost-effectiveness of this control measure has not been quantified at this time.

### **Other Impacts**

Fuel economy could be improved for affected vehicles that are repaired to operate properly, leading to an overall reduction in the use of gasoline. Exposure of motorists to noxious fumes from smoking vehicles would be reduced.

### **References**

South Coast AQMD, 1989 AQMP Revision, CM 88-G-5.

## **CM H3: REQUIREMENT FOR CLEAN FUEL VEHICLES IN FLEETS**

*(Replaced by Control Measure M4)*

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## Background

This control measure would reduce ROG and NO<sub>x</sub> emissions by requiring certain fleet operators to purchase and operate cleaner vehicles, through use of alternative fuels and/or improved control systems which reduce emissions below prevailing standards.

Corporate fleets are believed to constitute around 10 percent of vehicle registrations in the Bay Area. A survey of the fleet operators in the South Coast Air Basin, showed the following general characteristics:

- 12 percent of the total vehicle population is owned by fleet operators.
- The average fleet vehicle is driven around 10,000 miles/year.
- 99.5 percent of fleets are non-transit.
- Public transit vehicles such as buses are driven over 34,000 miles/year.
- Fleets use 15 percent of the gasoline and, more significantly, 60 percent of the diesel fuel consumed in the South Coast District.
- A very small proportion of fleet operators (5 percent) operate a large percentage (70 percent) of fleet vehicles.
- Conversely, there are numerous fleet operators (60 percent) whose market share add up to a small percentage (6 percent) of all fleet vehicles.

## Regulatory History

In September 1990, in response to California Clean Air Act requirements, the Air Resources Board (ARB) adopted emission standards for low and ultra-low emitting (LEVs). These standards will be implemented between 1994 and 2003 model years, and are expected to require the use of alternative fuels on some models. New gasoline specifications are also being implemented by ARB.

Senate Bill 2723, authored by assemblyman John Seymour and signed into law in 1988, appropriated funds from the Petroleum Violation Escrow Account (PVEA) to conduct a demonstration of compressed natural gas (CNG) as a transportation fuel. To carry out the demonstration, funding is provided to pay the cost difference between the price of new CNG-powered light duty vehicles and comparable gasoline powered vehicles when purchased by local governments.

Recent California legislation (SB 151) have authorized the SCAQMD to adopt regulations that require fleet operators to purchase and operate clean fuel vehicles. In particular, staff has been directed to proceed such that, by the year 2000, 15 to 30 percent of all fleet vehicles should be clean fuel vehicles.

## Emissions Subject to Control

The affected source categories are tailpipe and evaporative emissions from *light duty passenger vehicles -- catalytic* and *light and medium duty trucks -- catalytic*. It was assumed that one percent of the total emissions from these categories would be affected by this control measure. The projected ROG and NO<sub>x</sub> emissions subject to control are given below.

Year	Emission Subject To Control	
	Control ROG (TPD, Summer)	Control NO <sub>x</sub> (TPD, Summer)

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1994	1.24	.41
1997	1.09	.39
2000	.91	.38

## Proposed Method of Control

This control measure is intended to increase the fleet share of LEVs to a significant level within a given time period. The types and sizes of vehicle fleets that would be affected, and the percentage of LEVs required in affected fleets, has yet to be established. Fleets are well suited to this control measure as they are most likely to use central filling stations, which may be needed where alternative fuels are used.

Several options are currently viable for providing vehicles with reduced emissions, including cleaner gasoline-fueled vehicles which rely on modified fuel parameters and/or advanced control systems, and alternative fueled vehicles. Among alternative fuels, methanol, compressed natural gas (CNG) and liquid petroleum gas (LPG - propane or butane) are of immediate interest. Electric vehicles (EVs) are in an advanced stage of development. The status of the various alternative-fueled vehicles are briefly described below.

### Methanol

Engines capable of operating on methanol and various mixtures of gasoline and methanol have been under development since 1980. These are called Fuel Flexible Vehicles (FFVs) and have been in various demonstration programs since 1988.

Most recently, the California Energy Commission (CEC) started a demonstration program with California light-duty fleet operators. Their goal is to facilitate the placement of at least 5000 FFVs by 1993. Ford and General Motors will each be producing around 200 vehicles in 1991, increasing to 2000 to 2500 by 1993. The CEC has agreements with major oil companies such as ARCO, Chevron, Shell and Exxon to establish methanol fueling stations throughout California.

Detroit Diesels have manufactured methanol-powered engines for transit buses which have been in various demonstration programs in Denver, the South Coast, and in Marin County. However, most of the research and the demonstration programs are in the light-duty passenger vehicle category.

Exhaust emissions from vehicles operating on methanol fuel are lower in ROG and NO<sub>x</sub> than gasoline-fueled vehicles. Because methanol is less volatile than gasoline, evaporative ROG emissions are also reduced. Studies have indicated that methanol fueled vehicles can effectively lead to a reduction of ozone levels by an estimated 20-50 percent on a per-vehicle basis.

### Compressed Natural Gas

The light and medium-duty trucks are currently the most likely candidates for conversion to CNG. Most of the conversion of the fleet is expected by retrofitting the vehicles to run on CNG as well as gasoline. A typical converted van carrying two CNG storage tanks would have a range of 200 miles. CNG can also be used in buses and other heavy duty diesel engines.

General Motors announced in July 1990 that the company will produce 1000 CNG dedicated light-duty pickup trucks by May 1991. 500 of these will be sold in California through selected dealerships.

PG&E has opened two CNG filling stations in Concord and Richmond. Others will open in Hayward, San Jose and San Rafael.

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The major constraints on CNG as a vehicle fuel are its conversion costs, and the refueling and storage requirements (CNG is stored at 2400-3000 psi).

Recent tests by CARB showed that reactive organics and carbon monoxide emitted from CNG vehicles are about half of that of a comparable gasoline vehicle. Nitrogen oxides are around 66 percent of that emitted from a gasoline-fueled vehicle.

### **Liquid Petroleum Gas (LPG)**

LPG in vehicles has been shown to reduce criteria pollutants, compared with gasoline- and diesel-fueled vehicles. LPG is marketed as propane or butane. It differs from natural gas in that it is heavier than CNG and that it has a higher heating value. LPG is stored at about 150 psi. The use of CNG and LPG are reported to extend engine life and result in less maintenance, compared with the gasoline engine.

LPG emits markedly less carbon monoxide than gasoline, as well as fewer reactive organics. Evaporative emissions are negligible with LPG, as it is always stored in sealed tanks and unexposed to the atmosphere even during fueling. LPG contains negligible particulates and effectively no sulfides. Initial studies have shown that NO<sub>x</sub> emissions from LPG-fueled vehicles are similar to those from gasoline-fueled vehicles but lower than from diesel vehicles.

### **Electricity**

The technology that provides the most significant emission reductions on a per/vehicle basis is that of electric vehicles (EVs), which operating on batteries. The technology is progressing to develop batteries which provide greater range and higher speeds. Chrysler is expecting to introduce a half-ton mini-van in 1991 with a top speed of 70 miles/hour and a driving range of 120 miles.

The use of electric vehicles reduce ROG and CO emissions by almost 100 percent, and NO<sub>x</sub> by 65 percent or more depending on whether power is generated within or outside the basin. Power plant emissions can be controlled to very low levels when compared to vehicle emissions.

### **Emission Reductions Expected**

Emission reductions would depend on the number of vehicles converted, the type of alternative fuel used and many other variables. It was assumed that the tailpipe ROG emissions would be reduced by 25 percent for passenger vehicles and by 48 percent for light and medium duty trucks. Evaporative ROG emissions from these vehicles were assumed to be reduced by 100 percent. NO<sub>x</sub> emissions from light and medium duty trucks were assumed to be reduced by 33 percent.

The estimates below show the emission reductions achievable if the measure could be fully implemented in the corresponding year.

	<b>ROG Reductions</b>	<b>NO<sub>x</sub> Reductions</b>
<i>Year</i>	<i>(TPD, Summer)</i>	<i>(TPD, Summer)</i>
1994	.41	.14
1997	.37	.13
2000	.38	.13

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## Costs of Control

The costs of control are dependent on many factors, such as the price of alternative fuels and vehicles compared to conventional vehicles, maintenance and overhaul costs, and the costs of retrofitting. The overall cost-effectiveness of this control measure has not been quantified at this time.

### Methanol

On the basis of mileage output, methanol is estimated to cost from \$1.00 to \$1.50 per gallon in the early 1990s. Firm FFV vehicle production cost figures are not available.

### CNG

The cost of retrofitting vehicles to run on CNG has been estimated at \$2,500 per vehicle. Considering the fuel and maintenance costs, the payback periods were analyzed to range from 2.5 to 6.1 years. Ford estimated that dedicated NGVs would cost up to \$1000 more than a comparable gasoline vehicle. Other data indicates cost savings of \$13 to \$293 dollars per vehicle per year. The fuel costs in these data includes amortized costs of a refueling station and associated operating and maintenance, but does not include federal and state fuel taxes.

The capital cost for CNG dispensing equipment is estimated at \$250,000 per station

According to a report from the American Gas Association, on a total operating cost per mile basis including conversion, compressor station and fuel costs, natural gas vehicles enjoy an 11 percent savings relative to gasoline.

### LPG

Retrofit costs per vehicle have been reported in the range of \$700 to \$1700 for an average vehicle. Prices for LPG are very competitive with gasoline. Existing fleets operating on LPG have reported cost saving in the range of 20 to 55 percent continuously over the past 10 years, including the mile/gallon differential and dispensing costs. The average price for LPG ranges from \$0.46 to \$0.77 per gallon (including tax and delivery), depending on the quantity of fuel purchased.

The cost of an installed large single tank dispensing unit is in the range \$40,000 to \$75,000, excluding the cost of associated site work or special fire protection. The installed cost of a small installed tank (500 to 2000 gallons) and dispenser would range from \$5,000 to \$15,000.

### Electricity

Estimates from the Electric Vehicle Corporation show the life cycle costs for electric vans to be 29 to 35 percent greater than for conventional vans. For an electric van to be competitive with conventional vans, the in-service life of an EV needs to be 143,000 to 165,000 miles. This is considered to be realistic.

### Other Impacts

Adverse impacts associated with the use of alternative fuels include unknown public health effects of exposure to methanol and its exhaust product, formaldehyde. With current technology, methanol-fueled vehicles emit relatively large amounts of formaldehyde, a potential carcinogen (estimated to be

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2 to 5 times the emissions of gasoline powered vehicles). Formaldehyde emissions can, however, be substantially reduced by tailpipe catalytic controls.

Methanol's water solubility and lack of odor and taste could permit widespread pollution before a methanol spill is recognized. Methanol also burns with an invisible flame, making methanol flames more dangerous and difficult to fight.

It would be necessary to minimize leaks and losses of CNG during handling, as methane is 30 times more potent than CO<sub>2</sub> as a greenhouse gas.

Increased utilization of some alternative fuels can aid in reducing the U.S. dependency on imported petroleum fuel.

## **References**

SCAQMD 1989 AQMP Revision, CM 88-G-4, Clean Fuel in New Fleet Vehicles.

California's Mobile Source Plan for Continued Progress Toward Attainment of the State and National Ambient Air Quality Standards -- 1990 Update, CARB, December 1990.

## **M. MOBILE SOURCE MEASURES**

### **CM M5: PUBLICLY FUNDED VEHICLE BUY BACK AND REPAIR PROGRAM**

*Implemented, 1996*

#### **Background**

This mobile source control measure would accelerate the scrapping of older, high emitting vehicles from the region's roadways. It would also establish a repair program of light-duty vehicles operating under a waiver from the State's Inspection and Maintenance program. This measure would be funded with public funds and would be implemented in conjunction with a privately funded vehicle buy back program undertaken in accordance with (proposed) BAAQMD Manual of Procedure Volume VIII, Chapter 2.

#### **Regulatory History**

Vehicle buy back programs have become increasingly used throughout California as a cost-effective means for reducing motor vehicle emissions. The first programs were conducted in the South Coast Air Basin by UNOCAL. These efforts led to the development of Regulation 1610 by the South Coast Air Quality Management District (SCAQMD) in 1993. Under this regulation, stationary sources could buy and dismantle qualified older vehicles to meet certain control measures adopted by the SCAQMD.

The Santa Barbara Air Pollution Control District has been conducting a publicly funded buy back and repair program since 1993. The San Diego APCD and the San Joaquin Unified APCD have both conducted publicly funded buy back programs for one year.

The Sacramento Metropolitan AQMD has entered into an agreement with a private firm for the running of a buy back program. The Air District will grant Mobile Source Emission Reduction Credits to the private firm for each qualifying vehicle removed from service. The private firm in turn will

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attempt to sell the credits to entities subject to the Air Districts forthcoming Commute Alternatives and Fleet regulations.

## **Emissions Subject to Control**

This control measure would reduce emissions of carbon monoxide, reactive hydrocarbons and oxides of nitrogen by light-duty motor vehicles. The vehicle buy back component would reduce these emissions from vehicles from model years 1972, 1973, and 1974. The repair program would reduce these emissions from all model years subject to the biennial Inspection and Maintenance Program.

## **Proposed Method of Control**

Advances in emission control technologies have resulted in cleaner cars over time. As vehicles age and become worn out, normal rates of attrition remove the older vehicles from the region's roadway. To accelerate this process, the District would pay for the removal of 1,000 light-duty motor vehicles a year. At the end of three years the District would assess the need for the continuance of this measure.

Data derived from the Bureau of Automotive Repair indicates that there are approximately 200,000 light-duty motor vehicles from the 1972 through 1974 model years on the road today. Because of the size of the available pool of vehicles and improvements to emission control technology implemented with model year 1975, this measure would focus on vehicles from the 1972 through 1974 model years. The scrapping of 3,000 motor vehicles of these model years would represent 1.5% of the available pool of vehicles.

The District would also, in coordination with the Bureau of Automotive Repair, establish a repair assistance program for owners of vehicles qualifying for waivers through the Inspection and Maintenance program. The District and the owner of the qualifying vehicle would share in the cost of repairs, with the owner paying \$400 or 1% of the owner's income, whichever is less. Subsidized repairs to a vehicle would be available one time only. All subsequent repairs would be the responsibility of the owner of the vehicle. If repairs cost more than \$1,000, the District would offer to buy the vehicle from the owner, or direct the owner to a privately funded vehicle buy back program.

## **Emission Reduction Expected**

The emission reductions from these programs would depend upon the amount of funding available. Based upon conservative assumptions on vehicle emissions and usage developed by the Air Resources Board and published in Mobile Source Emission Reduction Credits (February, 1994), removal of 1,000 automobiles would result in reductions of 0.13 tons per day of reactive hydrocarbons and 0.04 tons per day of nitrogen oxides.

An estimate of the expected reduction in emissions from the repair of waived, light-duty motor vehicles is unavailable at this time.

## **Cost**

If the average cost of the scrapped vehicles (including costs for administration and overhead) was \$1,000, the proposed program would cost \$1,000,000 per year. The cost effectiveness, on an annualized basis, would be \$6,859 per ton of Precursor Organic Compounds, \$22,222 per ton of Oxides of Nitrogen, or \$5,249 per ton if the emission reductions are summed.

The costs for repairing 1,000 light-duty vehicles per year, at an assumed average cost of \$500, would cost \$150,000. The cost-effectiveness of this effort is unknown.

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## Schedule

A publicly funded buy back and repair program would be implemented in 1995 through 1997, assuming passage of legislation authorizing the use of vehicle registration surcharge revenues for such a program.

## References

BAAQMD, "Manual of Procedures, Volume VIII, Chapters 1 and 2 (Proposed)," March 1994.

California Air Resources Board, *Mobile Source Emission Reduction Credits*, February 1994.

Santa Barbara Air Pollution Control District, *Implementation Plan: Old Vehicle Clean Up Partnership*, February 10, 1993.