

## WORKSHOP REPORT

### PROPOSED AMENDED RULE 67.19—COATINGS AND PRINTING INKS MANUFACTURING OPERATIONS

### PROPOSED AMENDED RULE 67.22—EXPANDABLE POLYSTYRENE FOAM PRODUCTS MANUFACTURING OPERATIONS

### PROPOSED AMENDED RULE 67.24 - BAKERY OVENS

A workshop notice was mailed to all companies in San Diego County that are involved in manufacturing of coatings, printing inks, or expandable polystyrene foam products. A workshop notice was also mailed to all companies that operate bakeries in San Diego County. In addition, notices were mailed to all Chambers of Commerce in San Diego County, all Economic Development Corporations, the U.S. Environmental Protection Agency (EPA), the California Air Resources Board (ARB), and other interested parties.

The workshop was held on December 15, 1994, and was attended by 10 people. There were no comments addressed specifically to Rules 67.19 and 67.22. A general comment and comments on Rule 67.24 and the District responses are as follows:

#### 1. WORKSHOP COMMENT

How will the change in major source threshold reflected in these rules affect District Regulation XIV (Title V - Operating Permits) ?

#### DISTRICT RESPONSE

Rules 67.19, 67.22, and 67.24 are independent of Regulation XIV. The proposed amendments reflect EPA's reclassification of San Diego County from a severe to a serious ozone nonattainment area and the concomitant increase in the major source threshold for ozone precursors, volatile organic compounds (VOCs) and nitrogen oxides (NOx), from 25 tons per year to 50 tons per year. Consequently, the applicability threshold for the reasonably available control technology (RACT) requirements in these rules was increased to sources with VOC emissions of 50 tons per year or more.

The EPA's reclassification also raises the applicability threshold of Regulation XIV to 50 tons per year for sources emitting ozone precursors. Presently, many California air districts and the ARB are working with EPA to develop specific rules which would allow the District to impose federally enforceable permit conditions to limit a source's potential to emit to less than 50 tons per year of VOC or NOx, thereby exempting the source from Regulation XIV (Title V) permit requirements.

#### 2. WORKSHOP COMMENT

Will there be any changes in the recordkeeping requirements for the smaller bakeries?

#### DISTRICT RESPONSE

No. Bakeries with ovens that have a combined rated heat input capacity of more than two million British Thermal Units are still required to keep records which would enable the District to quantify their emissions.

### 3. WORKSHOP COMMENT

The rule requires a 90% overall efficiency of add-on control equipment. Other areas of the country only require 81% control efficiency, and this requirement may be reduced in the future to allow the use of alternative control technologies.

#### DISTRICT RESPONSE

A 90% VOC control efficiency for bakery ovens is achievable with existing technology and is consistent with the control efficiency requirements for bakery ovens in other California air districts. This level of control is also consistent with the California Clean Air Act requirements that the District adopt all feasible measures to reduce VOC emissions.

### 4. WORKSHOP COMMENT

Catalytic oxidizers, which are typically used to control bakery oven VOC emissions, are prone to catalyst masking which reduces control efficiency. Allowing for capture efficiency, the rule's requirement for a 90% control efficiency may not be achievable without excessive catalyst cleaning.

#### DISTRICT RESPONSE

The District disagrees. The District considers that the direct venting of stack emissions to add-on control equipment, as is the case for bakery ovens, provides a 100% capture efficiency. The 90% control efficiency requirement in the rule allows for some control efficiency degradation from typical start-up levels (95% or higher) because of catalyst deactivation or masking. A catalytic oxidizer used to control emissions from a commercial bakery oven in the Bay Area Air Quality Management District has successfully met a 90% regulatory control efficiency standard for at least a year.

### 5. WORKSHOP COMMENT

Recent data indicate that it is not cost-effective to require add-on controls, using current technology, on bakery ovens emitting less than 25 tons of VOCs per year. Therefore, Rule 67.24 should exempt bakery ovens emitting less than 25 tons per year.

#### DISTRICT RESPONSE

The District disagrees. Rule 67.24 emission control requirements apply to a stationary source with annual VOC emissions of 50 tons or more regardless of the amount of emissions from an individual oven. District calculations indicate that existing add-on control technology (catalytic oxidation) is cost-effective for ovens at bakeries of this size.

In addition, this provides a bakery with multiple ovens the flexibility to control only some of the ovens, as long as the aggregate overall control efficiency for all ovens at the bakery is at least 90%.

**6. WORKSHOP COMMENT**

Can the District amend Rule 67.24 considering cost-effectiveness and control technology issues now?

**DISTRICT RESPONSE**

No. The proposed rule amendments are intended to address issues related to EPA's reclassification of San Diego County from a severe to a serious ozone nonattainment area. The District must submit this rule for Board approval as expeditiously as possible to comply with Federal Clean Air Act requirements and to coordinate with EPA's approval process for the State Implementation Plan. The District will consider any new information on cost-effectiveness and control technology when such information becomes available. If future amendments to the rule are to be considered, they must be consistent with EPA guidance and requirements for Reasonably Available Control Technology.

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