



CALIFORNIA METALS COALITION

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April 10, 2020

RE: Request for Source Test Data Related to PR 1147.2

Mike Morris, Planning and Rules Manager
South Coast Air Quality Management District
21865 East Copley Drive
Diamond Bar, California 91765

As a follow-up to California Metals Coalition's December 10, 2019 comment letter, CMC reiterates and expands its request to receive SCAQMD's source test data referenced in Proposed Rule (PR) 1147.2 working group meetings. Receipt, and review, of this data is critical prior to the completion of staff's BARCT technical feasibility review.

CMC's previous request was:

"On Slide 13, the presentation shows test results as low as 7ppm. On Slide 19, the presentation shows test results as low as 5ppm. When considering potential rulemaking requirements that can come from this information, ultra-low results need to be further explained by providing all the input data.

For ensuing working group meetings, information—especially that which is on the outer scope of general test findings—should be further described (ex: type of metal facility operation, process, burner size, burner controls, hours of operation, dynamic or static loads, temperature, etc)."

On February 26, 2020, participants in PR 1147.2 Working Group Meeting #4 received a short list of "Sub-30 ppm Source Test Results." As reference, the list is included as an attachment to this letter.

CMC appreciates staff's work to compile this list. It was helpful to begin a deeper BARCT technical feasibility review. However, there are sections and categories missing in the handout that would allow stakeholders to better assess whether the currently proposed BARCT limits of 15-30 ppm are technically feasible.

Below are those additional sections and categories that should be shared prior to the completion of staff's BARCT technical feasibility review. This follow-up request for information encompasses the "Sub-30" data set, as well as all other source test data shared with working group participants.

- **Below AND Above 30 ppm DATA:** The February 26th data set includes information from source tests below 30ppm. CMC requests that SCAQMD source test data below and above 30 ppm be shared.
- **New Installs or Retrofit?:** PR 1147.2 is a retrofit rule, but the February 26th data does not state whether the source tests were conducted on new installs or retrofits. The February 26th data needs to be completed with this information, as well as included in the next set of data information shared with the working group.
- **Material Heated:** It is useful for stakeholders to know what type of materials were heated in the source tested equipment. One could make assumptions based on temperature, but this is not an accurate way to measure. The February 26th data needs to be completed with this information, as well as included in the next set of data information shared with the working group.
- **Number of Burners:** The number of burners is important to understand when assessing the technological feasibility of a retrofit. The February 26th data needs to be completed with this information, as well as included in the next set of data information shared with the working group.
- **Burner Manufacturer and Model:** There are various burner manufacturers serving a diverse market of California metal facilities. The source test data should be accompanied by the burner manufacturer and model of the unit. If the burners were customized for the particular equipment, and considered proprietary to the facility, this should be noted.
- **Furnace Size:** The size of the furnace should be reported in the data. The February 26th data needs to be completed with this information, as well as included in the next set of data information shared with the working group.
- **RECLAIM:** It is helpful to know whether the source test was done under RECLAIM. The February 26th data needs to be completed with this information, as well as included in the next set of data information shared with the working group.
- **Uniformity Requirements Noted:** Uniformity is a key function of the equipment being regulated under PR 1147.2. It should be noted whether the source tests were conducted while meeting uniformity requirements, and what was the temperature uniformity requirement. The February 26th data needs to be completed with this information, as well as included in the next set of data information shared with the working group.
- **Method of Firing:** When considering a retrofit, it is valuable to know what method of firing was used in the sourced tested equipment. This includes ratio, excess air, biased ratio or pulse fired. Information should also include the percent of maximum firing rate.
- **Equipment Not Source Tested:** To better understand the scope of the source test data, additional information (starting with the number of units) should be provided on equipment in the SCAQMD that will be impacted by PR 1147.2, but have not yet been source tested.
- **What Type of Source Test Was Conducted:** Source testing is standardized, but it is always useful to know what methods were used to collect the data.

As previously noted in this letter, as well as in working group meetings, the task of analyzing and understanding the technical feasibility of BARCT in 1147.2 is not complete. CMC looks forward to sharing more information and insight on this rulemaking process.

Thank you in advance for your time on this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jim', with a stylized flourish extending to the right.

James Simonelli
Executive Director

cc: Susan Nakamura, James McCreary, Uyen-Uyen Vo, Charlene Nguyen