



SJVAPCD Rule Changes

Rules 4306 and 4320



AJ Feliz Director of Engineering R.F. MacDonald Co.

Welcome

Thank you for joining us for our first of a series of informational workshops on the San Joaquin Valley Air Pollution Control District Rules 4306 and 4320 that take effect May 1, 2022.



- AJ Feliz
- Director of Engineering
- ME degree out of Cal Poly Pomona
- With R.F. MacDonald Co. for 18 years
- Specializing in custom emission control systems utilizing SCR



Applicability

San Joaquin Valley AIR POLLUTION CONTROL DISTRICT



- Central Valley Counties
- Applies to:
 - Boilers
 - Steam Generators
 - Process Heaters
- Sizes >5 MMBtu/hr
- First deadline is May 1, 2022
- Compliance with both rules 4306
 and 4320 is required





San Joaquin Valley AIR POLLUTION CONTROL DISTRICT

- Establishes a baseline for all units across the district
- End users broken down by categories:
 - A General, 5-20MMBtu
 - B General, >20MMBtu
 - C Oilfield Steam Generators
 - D Refineries
 - E Limited Use Permits



Category A - Units >5 MMBtu/hr and units 20 MMBtu/hr

(approx. 119HP - 476HP)

	Operated on Ga	seous Fuel	Operated on Liquid Fuel		
Category	NOx Limit	CO Limit (ppmv)	NOx Limit	CO Limit (ppmv)	
A. Units with a total rated heat input > 5.0 MMBtu/hr to ≤ 20.0 MMBtu/hr, except for Categories C through G unit					
1. Fire Tube Boilers	7 ppmv or 0.0085 lb/MMBtu	400	40 ppmv or 0.052 lb/MMBtu	400	
2. Units at Schools	9 ppmv or 0.011 lb/MMBtu	400	40 ppmv or 0.052 lb/MMBtu	400	
3. Units fired on Digester Gas	9 ppmv or 0.011 lb/MMBtu	400	40 ppmv or 0.052 lb/MMBtu	400	
4. Thermal Fluid Heaters	9 ppmv or 0.011 lb/MMBtu	400	40 ppmv or 0.052 lb/MMBtu	400	
5. All other units	9 ppmv or 0.011 lb/MMBtu	400	40 ppmv or 0.052 lb/MMBtu	400	



• Category A - Units >5 MMBtu/hr and units 20 MMBtu/hr (approx. 119HP – 476HP)

Category	Emission Control Plan	Authority to Construct	Compliance Deadline
A. Units with a total rated heat input > 5.0 MME through G unit	3 tu/hr to ≤ 20.0 M	MBtu/hr, except fo	or Categories C
1a. Fire Tube Units permitted greater than 9 ppmv as of 6 months from date of rule amendment	May 1, 2022	May 1, 2022	December 31, 2023
1b. Fire Tube Units permitted less than or equal to9 ppmv as of 6 months from date of ruleamendment	May 1, 2028	May 1, 2028	December 31, 2029
2. Units at Schools	May 1, 2022	May 1, 2022	December 31, 2023
3. Units fired on Digester Gas	May 1, 2022	May 1, 2022	December 31, 2023
4. Thermal Fluid Heaters	May 1, 2022	May 1, 2022	December 31, 2023
5a. All other units permitted greater than 12 ppmv as of 6 months from date of rule amendment	May 1, 2022	May 1, 2022	December 31, 2023
5b. All other units permitted less than or equal to 12 ppmv as of 6 months from date of rule amendment	May 1, 2028	May 1, 2028	December 31, 2029



• Category B - Units >20 MMBtu/hr

(approx. >476HP)

		Operated on Ga	Baseous Fuel Operated on Li		iquid Fuel
	Category	NOx Limit	CO Limit (ppmv)	NOx Limit	CO Limit (ppmv)
B.	Units with a total rated heat inp	out > 20.0 MMBtu/hr, e	xcept for Categor	ies C through G unit	s
1.	Fire Tube Boilers with a total rated heat input > 20.0 MMBtu/hour and ≤ 75 MMBtu/hour	7 ppmv or 0.0085 lb/MMBtu	400	40 ppmv or 0.052 lb/MMBtu	400
2.	All other units with a total rated heat input > 20.0 MMBtu/hour and ≤ 75 MMBtu/hour	7 ppmv or 0.0085 lb/MMBtu	400	40 ppmv or 0.052 lb/MMBtu	400
3.	Units with a rated heat input > 75 MMBtu/hour	5 ppmv or 0.0061 lb/MMBtu	400	40 ppmv or 0.052 lb/MMBtu	400



San Joaquin Valley AIR POLLUTION CONTROL DISTRICT

• Category B - Units >20 MMBtu/hr

(approx. >476HP)

Category	Emission Control Plan	Authority to Construct	Compliance Deadline
B. Units with a total rated heat input > 20.0 MMBtu	hr, except for Cat	egories C through	Gunits
 1a. Fire Tube Boilers with a total rated heat input > 20.0 MMBtu/hour and ≤ 75 MMBtu/hour permitted greater than 9 ppmv as of 6 months from date of rule amendment 	May 1, 2022	May 1, 2022	December 31, 2023
1b. Fire Tube Boilers with a total rated heat input > 20.0 MMBtu/hour and ≤ 75 MMBtu/hour permitted less than or equal to 9 ppmv as of 6 months from date of rule amendment	May 1, 2028	May 1, 2028	December 31, 2029
2a. All other units with a total rated heat input > 20.0 MMBtu/hour and ≤ 75 MMBtu/hour permitted greater than 9 ppmv as of 6 months from date of rule amendment	May 1, 2022	May 1, 2022	December 31, 2023
2b. All other units with a total rated heat input > 20.0 MMBtu/hour and ≤ 75 MMBtu/hour permitted less than or equal to 9 ppmv as of 6 months from date of rule amendment	May 1, 2028	May 1, 2028	December 31, 2029
3a. Units with a rated heat input > 75 MMBtu/hour permitted greater than 7 ppmv as of 6 months from date of rule amendment	May 1, 2022	May 1, 2022	December 31, 2023
3b. Units with a rated heat input > 75 MMBtu/hour permitted less than or equal to 7 ppmv as of 6 months from date of rule amendment	May 1, 2028	May 1, 2028	December 31, 2029



• Category C – Oil Field Steam Generators

	Operated on Ga	seous Fuel	Operated on Liquid Fuel	
Category	NOx Limit	CO Limit (ppmv)	NOx Limit	CO Limit (ppmv)
C. Oilfield Steam Generators				
 Units with a total rated heat input > 5.0 MMBtu/hr and ≤ 20.0 MMBtu/hr 	9 ppmv or 0.011 lb/MMBtu	400	40 ppmv or 0.052 lb/MMBtu	400
2. Units with a total rated heat input > 20.0 MMBtu/hr and \leq 75.0 MMBtu/hr	9 ppmv or 0.011 lb/MMBtu	400	40 ppmv or 0.052 lb/MMBtu	400
3. Units with a total rated heat input > 75.0 MMBtu/hr	7 ppmv or 0.0085 lb/MMBtu	400	40 ppmv or 0.052 lb/MMBtu	400
4. Units firing on less than 50%, by volume, PUC quality gas	15 ppmv or 0.018 lb/MMBtu	400	40 ppmv or 0.052 lb/MMBtu	400



San Joaquin Valley AIR POLLUTION CONTROL DISTRICT

• Category C – Oil Field Steam Generators

Category	Emission Control Plan	Authority to Construct	Compliance Deadline
C. Oilfield Steam Generators			
1. Units with a total rated heat input > 5.0 MMBtu/hr and ≤ 20.0 MMBtu/hr	May 1, 2022	May 1, 2022	December 31, 2023
2. Units with a total rated heat input > 20.0 MMBtu/hr and ≤ 75.0 MMBtu/hr	May 1, 2022	May 1, 2022	December 31, 2023
3. Units with a total rated heat input > 75.0 MMBtu/hr	May 1, 2022	May 1, 2022	December 31, 2023
4. Units firing on less than 50%, by volume, PUC quality gas	May 1, 2022	May 1, 2022	December 31, 2023



San Joaquin Valley AIR POLLUTION CONTROL DISTRICT

	Operated on Gas	seous Fuel	Operated on Li	quid Fuel
Category	NOx Limit	CO Limit (ppmv)	NOx Limit	CO Limit (ppmv)
D. Refinery Units				
1. Boilers with a total rated heat	30 ppmv or 0.036 lb/MMBtu		40 ppmv or	400
input > 5.0 MMBtu/hr and ≤ 40.0 MMBtu/hr	$\begin{array}{r llllllllllllllllllllllllllllllllllll$	400	0.052 lb/MMBtu	
2 Pailars with a total rated hast	9 ppmv or 0.011 lb/MMBtu			
 Boilers with a total rated heat input > 40.0 MMBtu/hr and ≤110 MMBtu/hr 	5 ppmv or 0.0061 lb/MMBtu for replacement units	400	40 ppmv or 0.052 lb/MMBtu	400
3. Boilers with a total rated heat input >110 MMBtu/hr	5 ppmv or 0.0061 lb/MMBtu	400	40 ppmv or 0.052 lb/MMBtu	400



San Joaquin Valley AIR POLLUTION CONTROL DISTRICT

		Operated on Gas	seous Fuel	Operated on Liquid Fuel	
	Category	NOx Limit	CO Limit (ppmv)	NOx Limit	CO Limit (ppmv)
D.	Refinery Units				
4.	Process Heaters with a total rated heat input > 5.0 MMBtu/hr and ≤ 40.0 MMBtu/hr	30 ppmv or 0.036 lb/MMBtu 9 ppmv or 0.011 lb/MMBtu for replacement units	400	40 ppmv or 0.052 lb/MMBtu	400
5.	Process Heaters with a total rated heat input > 40.0 MMBtu/hr and ≤110 MMBtu/hr	15 ppmv or 0.018 lb/MMBtu 9 ppmv or 0.011 lb/MMBtu for replacement units	400	40 ppmv or 0.052 lb/MMBtu	400
6.	Process Heaters with a total rated heat input >110 MMBtu/hr	5 ppmv or 0.0061 lb/MMBtu	400	40 ppmv or 0.052 lb/MMBtu	400



Category	Emission Control Plan	Authority to Construct	Compliance Deadline
D. Refinery Units			
1. Boilers with a total heat input > 5.0 MMBtu/hr to \leq 40.0 MMBtu/hr	May 1, 2022	May 1, 2022	December 31, 2023
2. Boilers with a total rated heat input > 40.0 MMBtu/hr	May 1, 2022	May 1, 2022	December 31, 2023
3. Heaters with a total heat input > 5.0 MMBtu/hr to \leq 40.0 MMBtu/hr	May 1, 2022	May 1, 2022	December 31, 2023
4. Heaters with a total rated heat input > 40.0 MMBtu/hr	May 1, 2022	May 1, 2022	December 31, 2023



• Category E – Low Usage Units

	Operated on Ga	seous Fuel	uel Operated on Liquid	
Category	NOx Limit	CO Limit (ppmv)	NOx Limit	CO Limit (ppmv)
 E. Units limited by a Permit to Operate to an annual heat input of 9 billion Btu/year to 30 billion Btu/year 	30 ppmv or 0.036 lb/MMBtu	400	40 ppmv or 0.052 lb/MMBtu	400



San Joaquin Valley AIR POLLUTION CONTROL DISTRICT

- Enhanced limits which users have the option to comply with lower limits or pay annual fees in lieu of compliance
- Category A Units >5 MMBtu/hr and units 20 MMBtu/hr

Category	NOx Limit	Emission Control Plan	Authority to Construct	Compliance Deadline	
A. Units with a total rated heat through E units					
1. Fire Tube Boilers	5 ppmv or 0.0061 lb/MMBtu	May 1, 2022	May 1, 2022	December 31, 2023	
2. Units at Schools	9 ppmv or 0.011 lb/MMBtu	May 1, 2022	May 1, 2022	December 31, 2023	Same as 4306
3. Units fired on Digester Gas	9 ppmv or 0.011 lb/MMBtu	May 1, 2022	May 1, 2022	December 31, 2023	Same as 4306
4. Thermal Fluid Heaters	9 ppmv or 0.011 lb/MMBtu	May 1, 2022	May 1, 2022	December 31, 2023	Same as 4306
5. All other units	5 ppmv or 0.0061 lb/MMBtu	May 1, 2022	May 1, 2022	December 31, 2023	



San Joaquin Valley AIR POLLUTION CONTROL DISTRICT

Category B - Units >20 MMBtu/hr

	Category	NOx Limit	Emission Control Plan	Authority to Construct	Compliance Deadline		
В.	B. Units with a total rated heat input > 20.0 MMBtu/hr, except for Categories C through E units						
1.	Fire Tube Boilers with a total rated heat input > 20.0 MMBtu/hour and ≤ 75 MMBtu/hour	2.5 ppmv or 0.003 lb/MMBtu	May 1, 2022	May 1, 2022	December 31, 2023		
2.	All other units with a total rated heat input > 20.0 MMBtu/hour and ≤ 75 MMBtu/hour	2.5 ppmv or 0.003 lb/MMBtu	May 1, 2022	May 1, 2022	December 31, 2023		
3.	Units with a rated heat input > 75 MMBtu/hour	2.5 ppmv or 0.003 lb/MMBtu	May 1, 2022	May 1, 2022	December 31, 2023		



San Joaquin Valley AIR POLLUTION CONTROL DISTRICT

Category C – Oil Field Steam Generators

Category		NOx Limit	Emission Control Plan	Authority to Construct	Compliance Deadline
C. Oilfield Steam Generators					
1.	Units with a total rated heat input > 5.0 MMBtu/hr and ≤ 20.0 MMBtu/hr	6 ppmv or 0.0073 lb/MMBtu	May 1, 2022	May 1, 2022	December 31, 2023
2.	Units with a total rated heat input > 20.0 MMBtu/hr and ≤ 75.0 MMBtu/hr	5 ppmv or 0.0061 lb/MMBtu	May 1, 2022	May 1, 2022	December 31, 2023
3.	Units with a total rated heat input > 75.0 MMBtu/hr	5 ppmv or 0.0061 lb/MMBtu	May 1, 2022	May 1, 2022	December 31, 2023
4.	Units firing on less than 50%, by volume, PUC quality gas	5 ppmv or 0.0061 lb/MMBtu	May 1, 2022	May 1, 2022	December 31, 2023



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Category	NOx Limit	Emission Control Plan	Authority to Construct	Compliance Deadline	
D. Refinery units					
 Boilers with a total heat input > 5.0 MMBtu/hr to ≤ 40.0 MMBtu/hr 	5 ppmv or 0.0061 lb/MMBtu	May 1, 2022	May 1, 2022	December 31, 2023	
 2. Boilers with a total rated heat input > 40.0 MMBtu/hr to ≤ 110.0 MMBtu/hr 	5 ppmv or 0.0061 lb/MMBtu	May 1, 2022	May 1, 2022	December 31, 2023	
3. Boilers with a total rated heat input > 110.0 MMBtu/hr	2.5 ppmv or 0.003 lb/MMBtu	May 1, 2022	May 1, 2022	December 31, 2023	



San Joaquin Valley AIR POLLUTION CONTROL DISTRICT

Category	NOx Limit	Emission Control Plan	Authority to Construct	Compliance Deadline
D. Refinery units				
4. Process Heaters with a total heat input > 5.0 MMBtu/hr to ≤ 40.0 MMBtu/hr	5 ppmv or 0.0061 lb/MMBtu	May 1, 2022	May 1, 2022	December 31, 2023
 5. Process Heaters with a total rated heat input > 40.0 MMBtu/hr to ≤ 110.0 MMBtu/hr 	5 ppmv or 0.0061 lb/MMBtu	May 1, 2022	May 1, 2022	December 31, 2023
6. Process Heaters with a total heat input > 110.0 MMBtu/hr	2.5 ppmv or 0.003 lb/MMBtu	May 1, 2022	May 1, 2022	December 31, 2023



San Joaquin Valley AIR POLLUTION CONTROL DISTRICT

• Category E – Low Use Units

Category	Category NOx Limit		Authority to Construct	Compliance Deadline
E. Units limited by a Permit to Operate to an annual heat input >1.8 billion Btu/year but \leq 30 billion Btu/year.	9 ppmv or 0.011 lb/MMBtu	May 1, 2022	May 1, 2022	December 31, 2023



Rule 4320 Summary

- There is an option to pay an annual fee in lieu of the enhanced emissions requirement
- Annual fee compliance option for NOx will be \$9,350/ton and will be based on the total emissions from an individual source
- An additional 4% will be added for an administrative fee
- For those choosing to go this route, the SJVAPCD will provide invoices to users starting in 2025 for operations in 2024
- The intention to go the annual fee route needs to be submitted to the air district by May 1st, 2022



Rule Change Milestones

San Joaquin Valley AIR POLLUTION CONTROL DISTRICT

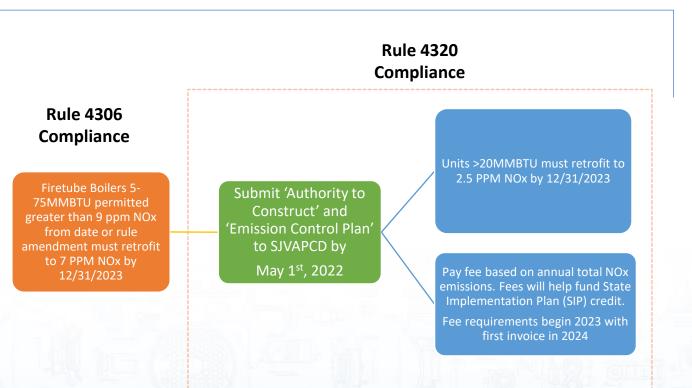




Example 1

San Joaquin Valley AIR POLLUTION CONTROL DISTRICT

SJVAPCD Compliance



- Firetube unit permitted greater than 9PPM must be retrofitted to 7PPM per Rule 4306
- Per Rule 4320, the user can choose to meet 2.5PPM or pay the fee for NOx emissions
- The compliance plan must be submitted to the SJVAPCD by 5/1/2022



Example 2

SJVAPCD Compliance **Rule 4320** Compliance Rule 4306 Compliance Firetube Boilers 5-20MMBTU must retrofit to 5 PPM NOx by 12/31/2023 Submit 'Authority to Firetube Boilers 5-Construct' and 20MMBTU permitted 'Emission Control Plan' less than 9 ppm NOx from date or rule to SJVAPCD by May 1st, 2022 2029 comply by 12/31 Pay fee based on annual total NOx emissions. Fees will help fund State Implementation Plan (SIP) credit. Fee requirements begin 2023 with first invoice in 2024

- Firetube unit permitted less than 9PPM is allowed deferment on 7PPM compliance per Rule 4306. Must comply with 7PPM by 12/31/2029
- Per Rule 4320, the user can choose to meet 5PPM or pay the fee for NOx emissions
- If the choice is to meet the 5PPM requirement, compliance is required by 12/31/2023
- If the choice is to pay the fee, then the unit can remain at the current emissions level and not have to retrofit to 7PPM until 12/31/2029
- The compliance plan detailing the site intentions must be submitted to the SJVAPCD by 5/1/2022



Conclusion



- When navigating the new rule changes, each user will have options to evaluate to see what makes the best sense for them
- Some early adopters have the ability to defer compliance until Dec. 31, 2029
- Regardless of the course of action, all users must have compliance plans submitted to the district by May 1, 2022



Questions



 If you have questions, please contact R.F. MacDonald Co. to go over your specific plan.



Future Online Workshops

ONLINE WORKSHOPS





lacNona

your boiler & pump solutions team

Future Workshop Solution – Burner Technology

BURNER RETROFIT & CONTROLS UPGRADE



- Ultra Low Emissions Burners on new units down to 5PPM NOx on sizes up to 50 MMBtu/hr input
- Jet burner retrofits to existing units down to 5PPM NOx on sizes up to 30 MMBtu/hr input
- Enhanced PLC controls to maintain repeatability across the firing range while also increasing operational efficiencies



Future Workshop Solution – SCR Technology

SELECTIVE CATALYTIC REDUCTION



• For Sources with limits below 5 PPM NOx requirements

- Anhydrous Ammonia Highest Risk
- Aqueous Ammonia Moderate Risk
- Urea Low Risk

	30		20		
Ammonia-Based Reagents	ANHYDROUS		Aqueous		UREA
Hazard Rating (Level of Toxicity): 3 = Extreme 2 = Moderate 1= Low	3		2		1
Level of Usage Risk:	Highest Risk		Moderate Risk		Lowest Risk
Ease of Use / Operational Readiness:	Ready to Operate		Vaporized before Use		Needs Vaporization & Conversion
Safety Requirements:	Training, Emergency Planning, Fire Dept. Audit		Training, Emergency Planning, Fire Dept. Audit		Training
Most Common Applications:	Power Plants, Industrial Facilities		Food Processing, Agriculture, Utilities		Hospitals, Schools, Universities, Prisons
RE MacDonald Co. Offers:	Full Installation Support & Service				

vour boiler & pump solutions team

Future Workshop Solution - Equipment Replacement



Some Benefits of New Equipment

- Replace older equipment that is at its upper life cycle.
- Replace larger units with multiple smaller boilers that meet requirements.
- Increased efficiency with newer units.



Equipment Maintenance Program (EMP)

We offer a customizable Boiler Equipment Maintenance Plan to maintain optimum performance, improve system stability, extend equipment life and minimize risk of a boiler system failure.

- Comply with Rule 4320 Section 5.7 for monitoring provisions
- Predictive Maintenance options



Cleaver Brooks Boiler Plant Optimization (BPO)

With our Boiler Plant **Optimization (BPO)** programs, we can assist with a variety of methodologies to create a successful roadmap to improve and address any site-specific issues. We partner with you to inspect and evaluate the four cornerstones of successful



plant operation: Safety, Efficiency, Reliability & Sustainability



Contact Information

Thank you for joining us today. A follow up email will be sent to you with your R.F. MacDonald Co. sales rep's contact information and a link to our workshops.

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- Please note, the information in this presentation is R.F. MacDonald Co.'s best interpretation of Rules 4306 & 4320
- If you have questions specific to your equipment, please contact R.F. MacDonald Co. to go over your options.

