### SMAQMD BACT CLEARINGHOUSE

CATEGOR	Y:		Miscellaneous	
BACT Size				sma Arc Metal Cutting Torc
BACT Determination Number: 233			BACT Determination Da	te: 12/20/2019
		Equipmo	ent Information	
Unit Size/	mber: N/A It Description: Rating/Capacity: It Location:	Generic BACT Determi Plasma Arc Metal C Minor Source BACT	nation Cutting Torch	ED
		BACT Determ	ination Information	
ROCs	Standard:			
	Technology Description:			
	Basis:			
NOx	Standard:			
	Technology Description:			
	Basis:			
SOx	Standard:			
	Technology Description:			
	Basis: Standard:	99.9% Control Efficiency		
PM10	Technology Description:			
	Basis:	Achieved in Practice		
PM2.5	Standard:			
	Technology Description:			
	Basis:			
СО	Standard: Technology			
	Description: Basis:			
	Standard:			
LEAD	Technology Description:			
	Basis:			
Comment	s: T-BACT was deter	mined to be equivalent to BA	CT.	
 District	Contact: Felix	Trujillo Phone No.:	(916) 874 - 7357 email: ftru	jillo@airquality.org

Printed: 12/20/2019



### BEST AVAILABLE CONTROL TECHNOLOGY & TOXIC BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION

	DETERMINATION NO.:_	233
EXPIRED	DATE:	12/20/19
	ENGINEER:	Felix Trujillo, Jr.
Category/General Equip Description:	Miscellaneous	
<b>Equipment Specific Description:</b>	Plasma Arc Metal Cutting Torch	
Equipment Size/Rating:	Minor Source BACT	
Equipment Size/Nating.	Willion Source BACT	
Previous BACT Det. No.:	158	

This BACT determination will update Determination #158 (8/1/17) for a plasma arc metal cutting torch.

### **BACT ANALYSIS**

Pursuant to the District's BACT Guidelines (2016), a review of the EPA, CARB, SCAQMD, SJVAPCD, BAAQMD and SDAPCD BACT Clearinghouses was performed. The District also reviewed any applicable rules from the aforementioned air districts that apply to this type of operation. The review of these sources showed no change in the rules or BACTs that were previously evaluated for minor sources under BACT No. 158. Therefore, there is no change in requirements as was previously determined under BACT No. 158. BACT No. 158 (Appendix A) will be attached as a reference for this BACT determination (see Attachment A).

### C. SELECTION OF BACT & T-BACT:

BACT # 233 For Plasma Arc Metal Cutting Torch			
Pollutant	Standard	Source	
VOC	No Standard		
NOx	No Standard		
SOx	No Standard		
PM10	99.9% Control Efficiency	SJVAPCD, SMAQMD, EPA BACT Clearinhouse	
PM2.5 (A)	No Standard		
СО	No Standard		

<sup>(</sup>A) PM2.5 is a subset of PM10. In general, PM2.5 is assumed to be equal to PM10 as a worst case scenario. But that may not be the case for fabric filter control, since particulate control is dependent on the density of the filtering media. Also, of the air districts that were evaluated for this BACT determination, SMAQMD is the only air district that evaluates BACT for PM2.5. Therefore, no standard will be listed for PM2.5.

APPROVED BY: But F While DATE: 12-20-19

## Attachment A BACT No. 158

CATEGORY:

**MISCELLANEOUS** 

BACT Size:

Minor Source BACT

**HD PLASMA CUTTER** 

**BACT Determination Number:** 

158

**BACT Determination Date:** 

8/1/2017

**Equipment Information** 

**Permit Number:** 

24729

**Equipment Description:** 

HD PLASMA CUTTER

Unit Size/Rating/Capacity:

**Equipment Location:** 

ONETO METAL PRODUCTS CORP.

7485 REESE ROAD SACRAMENTO, CA

### **BACT Determination Information**

ROCs	Standard:	
	Technology	
	Description:	
	Basis:	
NOx	Standard:	
	Technology	
	Description:	
	Basis:	
SOx	Standard:	
	Technology	
	Description:	
	Basis:	
PM10	Standard:	99.9%
	Technology	
	Description:	
	Basis:	Achieved in Practice
PM2.5	Standard:	99.9%
	Technology	
:=:	Description:	
	Basis:	Achieved in Practice
co	Standard:	
	Technology	
	Description:	
	Basis:	
LEAD	Standard:	
	Technology	
	Description:	
	Basis:	

Comments: TBACT was determined to be equivalent to BACT.

District Contact: Felix Trujillo

Phone No.: (916) 874 - 7357

email: ftrujillo@airquality.org



### BEST AVAILABLE CONTROL TECHNOLOGY & TOXIC BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION

	DETERMINATION NO.:	158
	DATE:	8/1/17
	ENGINEER:	Felix Trujillo, Jr.
Category/General Equip Description:	Miscellaneous	
Equipment Specific Description:	Plasma Arc Metal Cutting Torch	
Equipment Size/Rating:	Minor Source BACT	*
Previous BACT Det. No.:	15	

This BACT determination will update Determination #15 for plasma cutting systems.

This BACT was determined under the project for A/C 24729 (Oneto Metal Products Corp.).

### **BACT ANALYSIS**

### A: ACHIEVED IN PRACTICE (Rule 202, §205.1a)

The following control technologies are currently employed as BACT for plasma cutting systems by the following air pollution control districts and agencies:

The following control technologies have been identified and are ranked based on stringency:

District/Agency	Best Available Control Technology (BACT)/Requirements		
	BACT Source: I	EPA RACT/BACT/LAER Clearinghouse; RBLC ID: PA-0274	
	VOC	No standard	
	NOx	The permittee shall employ effective operational control practices to minimize emissions of NOx (A)	
	SOx	No standard	
-	PM10	99.9% control efficiency	
	PM2.5	99.9% control efficiency	
IIS EDA	CO	No standard	
(A) This requirement was included in Alleheny Ludlum Corporation's air for their plasma torch cutting operation (S-222), which was issued by County Heatlh Department. SMAQMD Air Quality Engineer Felix Tri with Air Quality Engineer Michael Dorman of the ACHD on 6/6/17 condition. Mr. Dorman indicated the condition is not specifically er		requirement was included in Alleheny Ludlum Corporation's air quality permit eir plasma torch cutting operation (S-222), which was issued by the Allegheny ty Heatlh Department. SMAQMD Air Quality Engineer Felix Trujillo, Jr. spoke Air Quality Engineer Michael Dorman of the ACHD on 6/6/17 regarding this tion. Mr. Dorman indicated the condition is not specifically enforceable and be removed in the future. Therefore, this requirement will not be included as uirement in this new BACT determination.	
	RULE RE	EQUIREMENTS:	

District/Agency	Best Available Control Technology (BACT)/Requirements	
	BACT Source: ARB BACT Clearinghouse	
ARB	Plasma Arc Metal Cutting Torch  VOC No standard  NOx No standard  SOx No standard  PM10 No standard  PM2.5 No standard  CO No standard  RULE REQUIREMENTS:  None	
SMAQMD	BACT Source: SMAQMD BACT Guideline No. 15  Plasma Arc Metal Cutting Torch  VOC No standard  NOx No standard  SOx No standard  PM10 99% control efficiency  PM2.5 No standard  CO No standard  RULE REQUIREMENTS:  None	
South Coast AQMD	BACT Source: SCAQMD BACT Guidelines for Non-Major Polluting Facilities, page 92  Plasma Arc Metal Cutting Torch  VOC No standard  NOx No standard  SOx No standard  PM10 Water table and nozzle water shroud; or electrostatic precipitator  PM2.5 No standard  CO No standard  RULE REQUIREMENTS:  None	

District/Agency	Best Available Control Technology (BACT)/Requirements		
	BACT		
	Source: NSR Requirements for BACT		
	Plasma Arc Metal Cutting Torch		
	VOC No standard		
	NOx No standard		
San Diego	SOx No standard		
County APCD	PM10 No standard		
VOLUME - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	PM2.5 No standard		
	CO No standard		
<i>a</i>	RULE REQUIREMENTS: None		
	BACT Source: BAAQMD BACT Guidelines		
ş2	Source: BAAQIND BACT Guidelines		
	Plasma Arc Metal Cutting Torch		
8	VOC No standard		
	NOx No standard		
	SOx No standard		
Bay Area AQMD	PM10 No standard		
	PM2.5 No standard		
* 5	CO No standard		
25	RULE REQUIREMENTS:		
*	None		
".			
	BACT		
#I	Source: SJVUAPCD BACT Guideline 8.3.11		
	Plasma Arc Metal Cutting Torch		
=	VOC No standard		
San Joaquin	NOx No standard		
Valley APCD	SOx No standard PM10 99.9% Control efficiency (HEPA dust collector, fabric filter		
	PM10 99.9% Control efficiency (HEPA dust collector, fabric filter baghouse, or equiv.)		
= = =	PM2.5 No standard		
	CO No standard		
	THE SIGNINGIA		
	RULE REQUIREMENTS:		
	None		

	SUMMARY OF ACHIEVED IN PRACTICE CONTROL TECHNOLOGIES
VOC	No standard
NOx	No standard
SOx	No standard
PM10	1. 99.9% Control efficiency – [SJVAPCD, EPA BACT Clearinghouse]
	2. 99% Control efficiency – [SMAQMD]
	3. Water table and nozzle water shroud, or electrostatic precipitator – [SCAQMD]
PM2.5	1. 99.9% Control efficiency – [EPA BACT Clearinghouse]
CO	No standard

The following control technologies have been identified as the most stringent, achieved in practice control technologies:

BEST CONTROL TECHNOLOGIES ACHIEVED			
<b>Pollutant</b>	Standard	Source	
VOC	No standard		
NOx	No standard		
SOx	No standard		
	99.9% control efficiency	SJVAPCD (BACT), EPA BACT Clearhouse	
PM2.5	99.9% control efficiency	EPA BACT Clearinghouse	
CO	No standard		

### B. TECHNOLOGICALLY FEASIBLE AND COST EFFECTIVE (Rule 202, §205.1.b.):

### Technologically Feasible Alternatives:

Any alternative basic equipment, fuel, process, emission control device or technique, singly or in combination, determined to be technologically feasible by the Air Pollution Control Officer.

The table below shows the technologically feasible alternatives identified as capable of reducing emissions beyond the levels determined to be "Achieved in Practice" as per Rule 202, §205.1.a.

VOC	No other technologically feasible option identified	
NOx (A)	1. Selective Catalytic Reduction (SCR)	
	2. Selective Non-catalytic Injection (SNCR)	
SOx	No other technologically feasible option identified	
PM10	No other technologically feasible option identified	
PM2.5	No other technologically feasible option identified	
CO	No other technologically feasible option identified	

(A) Staff reviewed the April 2017 BACT determination for Vulcraft-A Division of Nucor Corporation (1875 West Highway 13 South Brigham City, Utah 84302) and concurred with their determination that a flex duct capture system with an ESP or fume collector would not be cost effective NOx control technology for a plasma cutter. Although ESP systems are typically used for controlling particulate matter, it is possible to control NOx by injecting activated carbon dust or a slurry of powdered limestone and aqueous ammonia and using the EPS to capture the particulate matter that is adsorbed in the carbon or reacted with the ammonia. This is a very expensive and complicated technology and thus not feasible for small applications such as plasma cutters.

BACT & T-BACT Determination Plasma Arc Metal Cutting Torch August 1, 2017 Page 5 of 5

None of the above technologies are technologically feasible, since they both require elevated exhaust gas termperatures. Although plasma cutting occurs at high temperatures, high volumes of air are necessarily exhausted by the collection system to capture the particulate matter (fume) generated by the process. The resulting gas stream is near ambient temperatures and several hundered degrees Fahrenheit lower than the temperatures needed for SCR and NSCR.

### C. SELECTION OF BACT:

BACT for PM10 and NOx will remain at what is currently achieved in practice.

Plasma Arc Metal Cutting Torch			
<b>Pollutant</b>	Standard	Source	
VOC	No standard	,	
NOx	No standard		
SOx	No standard		
PM10	99.9% control efficiency	SJVAPCD (BACT) EPA BACT Clearinghouse	
PM2.5	99.9% control efficiency	EPA BACT Clearinghouse	
CO	No standard	*	

### D. SELECTION OF T-BACT:

Toxics are in the form of PM matter. The control of particulate matter through meeting the BACT standard will also control toxics found in the PM. Therefore meeting the BACT controls for the control of PM will be considered equivalent to meeting T-BACT requirements (as determined in the SJVAPCD's BACT determination No. 8.3.4 – Plasma Arc Cutting Torch).

REVIEWED BY:		_ DATE: _	***
APPROVED BY:	Joseph Sign	_ DATE: _	8/4/17

# Attachment A BACT Determinations Referenced



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Technology Transfer Network

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**Process Information - Details** 

For information about the pollutants related to this process, click on the specific pollutant in the list below.

Help

FINAL

RBLC ID: PA-0274

Corporate/Company: ALLEGHENY LUDLUM CORPORATION
Facility Name: ALLEGHENY LUDLUM CORPORATION - BRACKENRIDGE FACILITY
Process: PLASMA TORCH CUTTING OPERATION (S-222)

### Pollutant Information - List of Pollutants

Primary Fuel:	Pollutant	Primary Emission Limit	Basis	Verified
Throughput: 30000.00 T/YR SPECIALTY STEEL PRODUCTS	Nitrogen Oxides (NOx)	0.7900 LB/H	BACT- PSD	NO
Process Code: 81.390	Particulate matter, filterable < 10 µ (FPM10)	0.0100 LB/H	BACT- PSD	NO
	Particulate matter, filterable < 2.5 μ (FPM2.5)	0.0100 LB/H	BACT- PSD	NO
	Particulate Matter (PM)	0.0100 LB/H	BACT- PSD	NO
	Visible Emissions (VE)	10.0000 % OPACITY FROM STACK	BACT- PSD	NO

Process Notes: THIS UNIT IS EQUIPPED WITH A BAGHOUSE.

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Technology Transfer Network

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**Pollutant Information** 

Click on the Process Information button to see more information about the process associated with this pollutant. Or click on the Process List button to return to the list of processes.

Tracing steps to the Facility highlighter

Help FINAL

RBLC ID: PA-0274

Corporate/Company: ALLEGHENY LUDLUM CORPORATION Facility Name: ALLEGHENY LUDLUM CORPORATION - BRACKENRIDGE FACILITY
Process: PLASMA TORCH CUTTING OPERATION (S-222)

Pollutant: Nitrogen Oxides (NOx)

CAS Number: 10102

Pollutant Group(s): InOrganic Compounds, Oxides

Substance Registry System: Nitrogen Oxides (NOx)

EPA/OAR Methods | All Other Methods

of Nitrogen (NOx), Particulate Matter (PM),

Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: P

P2/Add-on Description: THE PERMITTEE SHALL EMPLOY EFFECTIVE OPERATIONAL CONTROL PRACTICES TO MINIMIZE EMISSIONS OF NOX.

Unspecified Percent Efficiency: Compliance Verified: No EMISSION LIMITS: Case-by-Case Basis: BACT-PSD Other Applicable Requirements: Other Factors Influence Decision: Emission Limit 1: 0.7900 LB/H Emission Limit 2: 3.4600 T/YR Standard Emission Limit: COST DATA: Cost Verified? Dollar Year Used in Cost Estimates:

0 \$/ton

Cost Effectiveness:

Incremental Cost Effectiveness: 0 \$/ton

Pollutant Notes:

Test Method:

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Pednil Qetail.PollutantInfo&Facility\_ID=27094&Process\_ID=107501&Pollutant\_ID=171&Per\_Control\_Equipment\_Id=146&5&updated on 2/22/2017 Technology Transfer Network

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**Pollutant Information** 

Click on the Process Information button to see more information about the process associated with this pollutant. Or click on the Process List button to return to the list of processes.

Help FINAL

**RBLC ID: PA-0274** 

Corporate/Company: ALLEGHENY LUDLUM CORPORATION Facility Name: ALLEGHENY LUDLUM CORPORATION - BRACKENRIDGE FACILITY Process: PLASMA TORCH CUTTING OPERATION (S-222)

Pollutant: Particulate matter,

filterable < 10  $\mu$  (FPM10)

CAS Number: PM

Pollutant Group(s): Particulate Matter (PM),

Substance Registry System: Particulate matter, filterable <

10 μ (FPM10)

Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: A

P2/Add-on Description: EMISSIONS OF PM10 FROM THE PLASMA TORCH CUTTING OPERATION SHALL BE CONTROLLED BY A BAGHOUSE WITH A MINIMUM OVERALL CONTROL EFFICIENCY

Test Method:

Unspecified

EPA/OAR Methods All Other Methods

Percent Efficiency: Compliance Verified: 99.900 No

EMISSION LIMITS:

Case-by-Case Basis:

BACT-PSD

Other Applicable Requirements: Other Factors Influence Decision:

Emission Limit 1:

0.0100 LB/H

Emission Limit 2:

0.0400 T/YR

Standard Emission Limit: COST DATA:

Cost Verified?

Dollar Year Used in Cost Estimates:

0 \$/ton

Cost Effectiveness: Incremental Cost Effectiveness:

Pollutant Notes:

0 \$/ton

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Clearinghouse RBLC Basic Search RBLC Search Results Pollutant Information

**Pollutant Information** 

Click on the Process Information button to see more information about the process associated with this pollutant.
Or click on the Process List button to return to the list of processes.

Sollusine biograssion

Help | FINAL

RBLC ID: PA-0274
Corporate/Company: ALLEGHENY LUDLUM CORPORATION

Facility Name: ALLEGHENY LUDLUM CORPORATION - BRACKENRIDGE FACILITY Process: PLASMA TORCH CUTTING OPERATION (S-222)

Pollutant: Particulate matter, filterable < 2.5  $\mu$  (FPM2.5)

Incremental Cost Effectiveness:

Pollutant Notes:

CAS Number: PM

Escapabilitation (Sections) Region American

Pollutant Group(s): Particulate Matter (PM),

Substance Registry System: Particulate matter, filterable < 2.5 u (FPM2.5)

Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: A

P2/Add-on Description: EMISSIONS OF PM2.5 FROM THE PLASMA TORCH CUTTING OPERATION SHALL BE CONTROLLED BY A BAGHOUSE WITH A MINIMUM OVERALL CONTROL EFFICIENCY OF 99.9%.

Test Method: EPA/OAR Methods All Other Methods Unspecified Percent Efficiency: 99.900 Compliance Verified: No EMISSION LIMITS: Case-by-Case Basis: BACT-PSD Other Applicable Requirements: Other Factors Influence Decision: Emission Limit 1: 0.0100 LB/H Emission Limit 2: 0.0400 T/YR Standard Emission Limit: COST DATA: Cost Verified? Dollar Year Used in Cost Estimates: Cost Effectiveness: 0 \$/ton

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Technology Transfer Network

(C) CONTRACTION OF A CHARGE REAL CHARGE RELIES OF THE RECEIVED AND A CHARGE REAL PROCESS Information - Details

**Process Information - Details** 

For information about the pollutants related to this process, click on the specific pollutant in the list below.

Status (burb., (Boy Secie). Triston it solls. Facility Information. Process Est., **Briefss Informatio**n

Help |

FINAL

**RBLC ID:** OH-0316 Corporate/Company: V & M STAR Facility Name: V & M STAR Process: PLASMA ARC TORCH

Pollutant Information - List of Pollutants

Help

**Primary Fuel:** 

Throughput: 1900.00 ACFM Process Code: 81.290

Primary **Pollutant** Emission Limit Verified Particulate matter, filterable 0.1600 LB/H < 10 μ (FPM10) NO Visible Emissions (VE) 20.0000 % NO

Process Notes: TORCH CUTS THE SEAMLESS PIPE TO SIZE FOR DELIVERY THE APPLICATION DOES NOT DEFINE THE TORCH FUEL.

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**Pollutant Information** 

Click on the Process Information button to see more information about the process associated with this pollutant.
Or click on the Process List button to return to the list of processes.

HOLD House of the Secretal Education Results - Page 19, Information - Process Up - Process information

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Help

**RBLC ID:** OH-0316 Corporate/Company: V & M STAR Facility Name: V & M STAR Process: PLASMA ARC TORCH

Pollutant: Particulate matter, filterable < 10  $\mu$  (FPM10)

CAS Number: PM

Pollutant Group(s): Particulate Matter (PM),

Substance Registry System: Particulate matter, filterable < 10 μ (FPM10)

Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: A

P2/Add-on Description: PULSE JET FABRIC RILTER BAGHOUSE

Test Method: Unspecified EPA/OAR Methods | All Other Methods Percent Efficiency:

Compliance Verified: EMISSION LIMITS:

No

Case-by-Case Basis: BACT-PSD Other Applicable Requirements: SIP Other Factors Influence Decision: Unknown Emission Limit 1: 0.1600 LB/H Emission Limit 2:

0.7100 T/YR AS A ROLLING 12-MONTH SUMMATION 0.0100 GR/DSCF

Standard Emission Limit:

COST DATA:

Cost Verified?

Dollar Year Used in Cost Estimates: Cost Effectiveness:

0 \$/ton Incremental Cost Effectiveness: 0 \$/ton

Pollutant Notes:

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### SMAQMD BACT CLEARINGHOUSE

BACT Siz	e:		APC CARBON A	BSORPTION DR
BACT De	etermination Numb	<b>Der:</b> 15	BACT Determination Date:	8/18/200
		Equipm	ent Information	0/10/200
Permit N	umber: 17103			
Equipme	ent Description:	APC CARBON ABS	SORPTION DRUM	
Unit Size	/Rating/Capacity:	PLASMA CUTTING	3	
Equipme	nt Location:	ONETO METAL PR	RODUCTS CORP.	
		7485 REESE ROAL	D	
		SACRAMENTO, CA	Α	
		<b>BACT Determ</b>	ination Information	
ROCs	Standard:	NA		
	Technology	NA	740-	
	Description:			
	Basis:			****
NOx	Standard:	DRY PLASMA CUTTING		
*	Technology Description:	DRY PLASMA CUTTING		The second secon
	Basis:	Achieved in Pactice		
SOx	Standard:	NA		
	Technology Description:	NA		
	Basis:			
PM10	Standard:	90% CAPTURE 99% CON		
e <sub>w</sub> x	Technology Description:	BAGHOUSE/FABRIC FILT	ER AND COLLECTION SYSTEM	
	Basis:	Achieved in Pactice		
PM2.5	Standard:			
	Technology Description:			
	Basis:			
CO	Standard:	NA		
	Technology	NA	-	
	Description:			
	Basis:			
LEAD	Standard:			
	Technology Description:			
	Basis:			
Comment	s:			

### San Joaquin Valley Unified Air Pollution Control District

### Best Available Control Technology (BACT) Guideline 8.3.4\*

Last Update: 2/5/2003

### Metal Parts and Product Fabrication - Plasma Arc Cutting Torch

Pollutant	Achieved in Practice or	Technologically	Alternate Basic
	contained in the SIP	Feasible	Equipment
PM10	Electrostatic Precipitator or Dust Collector with a HEPA Filter (99.9% efficiency)		

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in s a state implementation plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

\*This is a Summary Page for this Class of Source

# BACT Template Version 071315

# SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities\*

10-20-2000 Rev. 0

Equipment or Process:

Plasma Arc Metal Cutting Torch

			Criteria Pollutants			
Rating/Size	VOC	NOx	SOx	00	PM10	Inorganic
> 30 KVA					Water Table and	
trical Input					Nozzle Water Shroud;	
					or Electrostatic	
					Precipitator	
				2	(1988)	

\* Means those facilities that are not major polluting facilities as defined by Rule 1302 - Definitions

BACT Guidelines - Part D

Plasma Arc Metal Cutting Torch