

## SMAQMD BACT CLEARINGHOUSE

CATEGORY Type:

**MATERIAL - HANDLING**

BACT Category: MINOR SOURCE

<b>BACT Determination Number:</b>	276	<b>BACT Determination Date:</b>	1/11/2022
<b>Equipment Information</b>			
<b>Permit Number:</b>	N/A -- Generic BACT Determination		
<b>Equipment Description:</b>	PORTABLE GREENWASTE/WOODWASTE TROMMEL SCREEN		
<b>Unit Size/Rating/Capacity:</b>	<b>EXPIRED</b>		
<b>Equipment Location:</b>			
<b>BACT Determination Information</b>			
<b>District Contact:</b> Felix Trujillo      Phone No.: (279)207-1154      email: ftrujillo@airquality.org			
<b>ROCs</b>	<b>Standard:</b>		
	<b>Technology Description:</b>		
	<b>Basis:</b>		
<b>NOx</b>	<b>Standard:</b>		
	<b>Technology Description:</b>		
	<b>Basis:</b>		
<b>SOx</b>	<b>Standard:</b>		
	<b>Technology Description:</b>		
	<b>Basis:</b>		
<b>PM10</b>	<b>Standard:</b>	EE < or equal to 5% Opacity	
	<b>Technology Description:</b>	Water spray or adequate moisture content of process materials.	
	<b>Basis:</b>	Achieved in Practice	
<b>PM2.5</b>	<b>Standard:</b>	VEE < or equal to 5% Opacity	
	<b>Technology Description:</b>	Water spray or adequate moisture content of process materials.	
	<b>Basis:</b>	Achieved in Practice	
<b>CO</b>	<b>Standard:</b>		
	<b>Technology Description:</b>		
	<b>Basis:</b>		
<b>LEAD</b>	<b>Standard:</b>		
	<b>Technology Description:</b>		
	<b>Basis:</b>		
<b>Comments:</b> This is a generic BACT determination based on BACT determinations made, and published, by other air agencies in California and/or other States.			

**BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION****EXPIRED**

<b>DETERMINATION NO.:</b>	<u>276</u>
<b>DATE:</b>	<u>1/11/22</u>
<b>ENGINEER:</b>	<u>Felix Trujillo, Jr.</u>

<b>Category/General Equip Description:</b>	<u>Trommel Screen</u>
<b>Equipment Specific Description:</b>	<u>Portable Greenwaste/Woodwaste Trommel Screen</u>
<b>Equipment Size/Rating:</b>	<u>Small Emitter BACT (&lt; 10lb/day)/Minor Source</u>
<b>Previous BACT Det. No.:</b>	<u>167</u>

This BACT determination will update Determination #167 (9/12/17) for a portable greenwaste trommel screen. The process involves greenwaste/woodwaste being loaded into a feed hopper and screened by the rotating trommel screen to remove any unwanted materials. The waste is then transferred via associated conveyors to stockpiles. The equipment is all skid mounted and is portable.

**A. BACT ANALYSIS:**

Pursuant to the District's Draft 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. 167. Also, no new technologically feasible control technologies were identified. Therefore, there is no change in requirements as was previously determined under BACT No. 167. BACT No. 167 will be attached as a reference for this BACT determination (see Appendix A).

This BACT will clarify that it applies to woodwaste and greenwaste.

**B. SELECTION OF BACT:**

BACT for Portable Greenwaste/Woodwaste Trommel Screen operations is the following:

<b>BACT # 276 for Portable Greenwaste/Woodwaste Trommel Screen</b>		
<b>Pollutant</b>	<b>Standard</b>	<b>Source</b>
VOC	No Standard	
NOx	No Standard	
SOx	No Standard	
PM10	VEE < or equal to 5% Opacity; Water spray or adequate moisture of process materials	SMAQMD/SJVAPCD
PM2.5	VEE < or equal to 5% Opacity; Water spray or adequate moisture of process materials	SMAQMD/SJVAPCD
CO	No Standard	

APPROVED BY: Brian F Krebs DATE: 01-11-2022

# **Attachment A**

**BACT No. 167**

CATEGORY:

**IC ENGINE COMPRESSION-PRIME**

BACT Size: Minor Source BACT

IC ENGINE PRIME POWER

<b>BACT Determination Number:</b> 167		<b>BACT Determination Date:</b> 9/12/2017	
<b>Equipment Information</b>			
<b>Permit Number:</b> 25332 <b>Equipment Description:</b> IC ENGINE PRIME POWER <b>Unit Size/Rating/Capacity:</b> Portable Greenwaste Trommel Screen <b>Equipment Location:</b> ZANKER ROAD RESOURCE MGMT, LTD DBA FLORIN PERKINS 4201 FLORIN PERKINS RD SACRAMENTO, CA			
<b>BACT Determination Information</b>			
<b>ROCs</b>	<b>Standard:</b>		
	<b>Technology Description:</b>		
	<b>Basis:</b>		
<b>NOx</b>	<b>Standard:</b>		
	<b>Technology Description:</b>		
	<b>Basis:</b>		
<b>SOx</b>	<b>Standard:</b>		
	<b>Technology Description:</b>		
	<b>Basis:</b>		
<b>PM10</b>	<b>Standard:</b>	VEE < or equal to 5% Opacity	
	<b>Technology Description:</b>	Water spray or adequate moisture content of process materials.	
	<b>Basis:</b>	Achieved in Practice	
<b>PM2.5</b>	<b>Standard:</b>	VEE < or equal to 5% Opacity	
	<b>Technology Description:</b>	Water spray or adequate moisture content of process materials.	
	<b>Basis:</b>	Achieved in Practice	
<b>CO</b>	<b>Standard:</b>		
	<b>Technology Description:</b>		
	<b>Basis:</b>		
<b>LEAD</b>	<b>Standard:</b>		
	<b>Technology Description:</b>		
	<b>Basis:</b>		
<b>Comments:</b> Minor Source/Small Emitter BACT (< 10 lb/day)			
<b>District Contact:</b> Felix Trujillo, Jr.      Phone No.: (916) 874 - 7357      email: smosunic@airquality.org			



## BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION

**DETERMINATION**

**NO.:** 167

**DATE:** 9/12/17

**ENGINEER:** Felix Trujillo, Jr.

**Category/General Equip  
Description:**

Screen

**Equipment Specific Description:**

Portable Greenwaste Trommel Screen

**Equipment Size/Rating:**

Small Emitter BACT (< 10 lb/day)/Minor Source

**Previous BACT Det. No.:**

None

This BACT was determined under the project for A/C's 25331 and 25332 (Zanker Road Resource Management, Ltd.).

### **BACT ANALYSIS**

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

The following control technologies are currently employed as BACT for portable greenwaste trommel screen operations:

District/Agency	Best Available Control Technology (BACT)/Requirements
US EPA	<b><u>BACT</u></b>
	<u>Source: EPA RACT/BACT/LAER Clearinghouse</u>
	Portable Greenwaste Trommel Screen
	<b>VOC</b> No standard
	<b>NOx</b> No standard
	<b>SOx</b> No standard
	<b>PM10</b> No standard
	<b>PM2.5</b> No standard
	<b>CO</b> No standard
	<b><u>RULE REQUIREMENTS:</u></b>
	None

District/Agency	Best Available Control Technology (BACT)/Requirements														
ARB	<p><b><u>BACT</u></b>  <a href="#">Source: ARB BACT Clearinghouse</a></p> <table border="1" data-bbox="423 428 1430 774"> <tr> <td colspan="2">Portable Greenwaste Trommel Screen</td></tr> <tr> <td><b>VOC</b></td><td>No standard</td></tr> <tr> <td><b>NOx</b></td><td>No standard</td></tr> <tr> <td><b>SOx</b></td><td>No standard</td></tr> <tr> <td><b>PM10</b></td><td>No standard</td></tr> <tr> <td><b>PM2.5</b></td><td>No standard</td></tr> <tr> <td><b>CO</b></td><td>No standard</td></tr> </table> <p><b><u>RULE REQUIREMENTS:</u></b>          Regulation to Establish a Statewide Portable Equipment Registration Program (Title 13, CCR, Article 5 Sections 2450-2465) sets the following requirements for portable greenwaste trommel screen registered in the PERP program.</p> <ol style="list-style-type: none"> <li>1. There shall be no visible emissions beyond the property line on which the equipment is being operated;</li> <li>2. No air contaminants shall be discharged into the atmosphere for a period of periods aggregating more than three minutes in any one hour which is as dark or darker than Ringelmann 1 or equivalent 20 percent opacity: and</li> </ol>	Portable Greenwaste Trommel Screen		<b>VOC</b>	No standard	<b>NOx</b>	No standard	<b>SOx</b>	No standard	<b>PM10</b>	No standard	<b>PM2.5</b>	No standard	<b>CO</b>	No standard
Portable Greenwaste Trommel Screen															
<b>VOC</b>	No standard														
<b>NOx</b>	No standard														
<b>SOx</b>	No standard														
<b>PM10</b>	No standard														
<b>PM2.5</b>	No standard														
<b>CO</b>	No standard														
SMAQMD	<p><b><u>BACT</u></b>          Source: SMAQMD BACT Clearinghouse</p> <table border="1" data-bbox="423 1220 1430 1545"> <tr> <td colspan="2">Portable Greenwaste Trommel Screen</td></tr> <tr> <td><b>VOC</b></td><td>No standard</td></tr> <tr> <td><b>NOx</b></td><td>No standard</td></tr> <tr> <td><b>SOx</b></td><td>No standard</td></tr> <tr> <td><b>PM10</b></td><td>No standard</td></tr> <tr> <td><b>PM2.5</b></td><td>No standard</td></tr> <tr> <td><b>CO</b></td><td>No standard</td></tr> </table> <p><b><u>RULE REQUIREMENTS:</u></b>          None</p>	Portable Greenwaste Trommel Screen		<b>VOC</b>	No standard	<b>NOx</b>	No standard	<b>SOx</b>	No standard	<b>PM10</b>	No standard	<b>PM2.5</b>	No standard	<b>CO</b>	No standard
Portable Greenwaste Trommel Screen															
<b>VOC</b>	No standard														
<b>NOx</b>	No standard														
<b>SOx</b>	No standard														
<b>PM10</b>	No standard														
<b>PM2.5</b>	No standard														
<b>CO</b>	No standard														

District/Agency	Best Available Control Technology (BACT)/Requirements														
South Coast AQMD	<p><b><u>BACT</u></b>            Source: <a href="#">SCAQMD BACT Guidelines for Non-Major Polluting Facilities, page 13.</a></p> <table border="1" data-bbox="423 432 1435 793"> <tr> <td colspan="2">Portable Greenwaste Trommel Screen</td></tr> <tr> <td><b>VOC</b></td><td>No standard</td></tr> <tr> <td><b>NOx</b></td><td>No standard</td></tr> <tr> <td><b>SOx</b></td><td>No standard</td></tr> <tr> <td><b>PM10</b></td><td>No standard</td></tr> <tr> <td><b>PM2.5</b></td><td>No standard</td></tr> <tr> <td><b>CO</b></td><td>No standard</td></tr> </table> <p><b><u>RULE REQUIREMENTS:</u></b>            None</p>	Portable Greenwaste Trommel Screen		<b>VOC</b>	No standard	<b>NOx</b>	No standard	<b>SOx</b>	No standard	<b>PM10</b>	No standard	<b>PM2.5</b>	No standard	<b>CO</b>	No standard
Portable Greenwaste Trommel Screen															
<b>VOC</b>	No standard														
<b>NOx</b>	No standard														
<b>SOx</b>	No standard														
<b>PM10</b>	No standard														
<b>PM2.5</b>	No standard														
<b>CO</b>	No standard														
San Diego County APCD	<p><b><u>BACT</u></b>            Source: <a href="#">NSR Requirements for BACT, page 27.</a></p> <table border="1" data-bbox="423 1041 1435 1402"> <tr> <td colspan="2">Portable Greewaste Trommel Screen</td></tr> <tr> <td><b>VOC</b></td><td>No standard</td></tr> <tr> <td><b>NOx</b></td><td>No standard</td></tr> <tr> <td><b>SOx</b></td><td>No standard</td></tr> <tr> <td><b>PM10</b></td><td>No standard</td></tr> <tr> <td><b>PM2.5</b></td><td>No standard</td></tr> <tr> <td><b>CO</b></td><td>No standard</td></tr> </table> <p>The SDCAPCD has a BACT trigger level of 10 lb/day.</p> <p><b><u>RULE REQUIREMENTS:</u></b>            None</p>	Portable Greewaste Trommel Screen		<b>VOC</b>	No standard	<b>NOx</b>	No standard	<b>SOx</b>	No standard	<b>PM10</b>	No standard	<b>PM2.5</b>	No standard	<b>CO</b>	No standard
Portable Greewaste Trommel Screen															
<b>VOC</b>	No standard														
<b>NOx</b>	No standard														
<b>SOx</b>	No standard														
<b>PM10</b>	No standard														
<b>PM2.5</b>	No standard														
<b>CO</b>	No standard														



District/Agency	Best Available Control Technology (BACT)/Requirements														
Bay Area AQMD	<p><b><u>BACT</u></b>            Source: <a href="#">BAAQMD BACT Guideline Document 180.1 (8/5/91)</a></p> <table border="1" data-bbox="423 447 1425 772"> <tr> <td colspan="2">Wood Processing Equipment</td></tr> <tr> <td><b>VOC</b></td><td>No standard</td></tr> <tr> <td><b>NOx</b></td><td>No standard</td></tr> <tr> <td><b>SOx</b></td><td>No standard</td></tr> <tr> <td><b>PM10</b></td><td>No standard</td></tr> <tr> <td><b>PM2.5</b></td><td>No standard</td></tr> <tr> <td><b>CO</b></td><td>No standard</td></tr> </table> <p>The BAAQMD has a BACT trigger level of 10 lb/day.</p> <p><b><u>RULE REQUIREMENTS:</u></b>            None.</p>	Wood Processing Equipment		<b>VOC</b>	No standard	<b>NOx</b>	No standard	<b>SOx</b>	No standard	<b>PM10</b>	No standard	<b>PM2.5</b>	No standard	<b>CO</b>	No standard
Wood Processing Equipment															
<b>VOC</b>	No standard														
<b>NOx</b>	No standard														
<b>SOx</b>	No standard														
<b>PM10</b>	No standard														
<b>PM2.5</b>	No standard														
<b>CO</b>	No standard														
San Joaquin Valley APCD	<p><b><u>BACT</u></b>            Source: SJVUAPCD BACT Guideline 6.4.1</p> <table border="1" data-bbox="423 1083 1425 1465"> <tr> <td colspan="2">Composted Materials – Screening, Transportable, Wood Waste Processing</td></tr> <tr> <td><b>VOC</b></td><td>No standard</td></tr> <tr> <td><b>NOx</b></td><td>No standard</td></tr> <tr> <td><b>SOx</b></td><td>No standard</td></tr> <tr> <td><b>PM10</b></td><td>Use of a water sprinkler system or maintaining moisture content of the process materials to prevent visible emissions in excess of 5% opacity.</td></tr> <tr> <td><b>PM2.5</b></td><td>No standard</td></tr> <tr> <td><b>CO</b></td><td>No standard</td></tr> </table> <p>According to the details page of BACT Guideline 6.4.1, the emissions unit for this BACT was a transportable trommel screen (see Attachment A).</p> <p>The SJVAPCD BACT trigger level is 2 lb/day.</p> <p><b><u>RULE REQUIREMENTS:</u></b>            None</p>	Composted Materials – Screening, Transportable, Wood Waste Processing		<b>VOC</b>	No standard	<b>NOx</b>	No standard	<b>SOx</b>	No standard	<b>PM10</b>	Use of a water sprinkler system or maintaining moisture content of the process materials to prevent visible emissions in excess of 5% opacity.	<b>PM2.5</b>	No standard	<b>CO</b>	No standard
Composted Materials – Screening, Transportable, Wood Waste Processing															
<b>VOC</b>	No standard														
<b>NOx</b>	No standard														
<b>SOx</b>	No standard														
<b>PM10</b>	Use of a water sprinkler system or maintaining moisture content of the process materials to prevent visible emissions in excess of 5% opacity.														
<b>PM2.5</b>	No standard														
<b>CO</b>	No standard														

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

SUMMARY OF ACHIEVED IN PRACTICE CONTROL TECHNOLOGIES		
Pollutant	Standard	Source
VOC	No Standard	
NOx	No Standard	
SOx	No Standard	
PM10	1. VEE < or equal to 5% Opacity; Water spray or adequate moisture of process materials 2. Water Spray w/ > 50% control efficiency	SJVAPCD BAAQMD
PM2.5	No Standard	
CO	No Standard	

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

BEST CONTROL TECHNOLOGIES ACHIEVED		
Pollutant	Standard	Source
VOC	No Standard	
NOx	No Standard	
SOx	No Standard	
PM10	VEE < or equal to 5% Opacity; Water spray or adequate moisture of process materials	SJVAPCD
PM2.5	No standard	
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.

Pollutant	Technologically Feasible Alternatives
VOC	None identified
NOx	None identified
SOx	None identified
PM10	Baghouse
PM2.5	Baghouse
CO	None identified

This operation is a portable greenwaste trommel screen that will be moved throughout the processing area. The use of a baghouse requires electrical power. The engines on these types of equipment can only power the equipment that is associated with the manufactured unit and cannot power additional equipment such as baghouses (as explained in BACT 166 for a wood waste grinder). This BACT will also apply to facilities that don't own their own equipment. These facilities would be issued flex permits, that will allow them to use equipment from various third party contractors. The requirement of a baghouse would put the burden on the operator or facility to obtain an additional permit for the baghouse. The greenwaste grinder is on wheels and can be easily moved from one location to another. The use of a baghouse would reduce the mobility of the equipment. There would also be a variation in the hp rating of the equipment, which may require a specific baghouse to be used with specific equipment. Therefore, it is not technologically feasible to use a baghouse with this type of portable equipment.

**Using the PM10 BACT standard for PM2.5:**

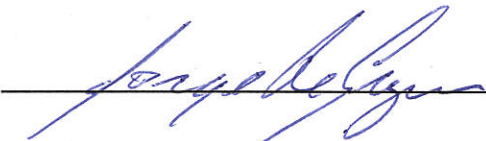
Since both, PM10 and PM2.5 trigger BACT at >0 lb/day and PM2.5 is a subset of PM10, BACT for PM2.5 will be triggered whenever BACT is triggered for PM10. Therefore, BACT for PM2.5 will be set to be the same as for PM10.

### C. SELECTION OF BACT

Small emitter BACT (< 10 lb/day) & Minor Source BACT for a portable greenwaste trommel screen is the following:

BACT FOR PORTABLE GREENWASTE TROMMEL SCREEN		
Pollutant	Standard	Source
VOC	No standard	
NOx	No standard	
SOx	No standard	
PM10	VEE < or equal to 5% Opacity; Water spray or adequate moisture of process materials	SJVAPCD
PM2.5	VEE < or equal to 5% Opacity; Water spray or adequate moisture of process materials	SJVAPCD
CO	No standard	

REVIEWED BY: \_\_\_\_\_ DATE: \_\_\_\_\_

APPROVED BY:  \_\_\_\_\_ DATE: 9/12/17

# **Attachment A**

## **Review of BACT Determinations**

San Joaquin Valley  
Unified Air Pollution Control District

**Best Available Control Technology (BACT) Guideline 6.4.1\***

Last Update: 04/03/1998

**Composted Materials - Screening, Transportable, Wood Waste  
Processing**

Pollutant	Achieved in Practice or contained in the SIP	Technologically Feasible	Alternate Basic Equipment
PM10	Use of a water sprinkler system or maintaining adequate moisture content of the process materials to prevent visible emissions in excess of 5% opacity		

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 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**

About the District  
Agriculture  
Air Pollution Complaints  
Air Quality Forecasts  
& Data  
Air Quality Plans  
Business Assistance  
Business Opportunities  
Compliance Assistance  
Employment  
Environmental Justice  
For Schools and Kids  
Grants & Incentives  
Healthy Air Living  
Information & Requests  
Land Use / CEQA / ISR  
Modeling & Inventory  
Online Bill Payment  
Permitting / Registration  
Public Meetings & Events  
Public Participation  
Rules & Regulations  
Take Action

Search:



**BACT Clearinghouse (Searchable)**

<b>Facility:</b>	City of Modesto, Compost Facility	<b>References:</b>	ATC #: N-3993-2-0 Project #: 960583
<b>Location:</b>	Various locations, SJVUAPCD	<b>Date of Determination:</b>	4/3/1998
<b>Pollutant</b>	<b>BACT</b>		
CO	BACT NOT TRIGGERED		
NOx	BACT NOT TRIGGERED		
PM10	Use of a water sprinkler system on the Trommel screen or maintaining adequate moisture content of the process materials to prevent visible emissions in excess of 5% opacity		
SOx	BACT NOT TRIGGERED		
VOC	BACT NOT TRIGGERED		

**BACT Status**

**Comment**

Achieved in Practice

At the time of this determination achieved in practice BACT  
was equivalent to technologically feasible BACT

**BAY AREA AIR QUALITY MANAGEMENT DISTRICT**  
**Best Available Control Technology (BACT) Guideline**

**Source Category**

Source:	Wood Processing Equipment	Revision:	1
Class:	All	Document #:	180.1
		Date:	08/05/91

**Determination**

POLLUTANT	BACT	TYPICAL TECHNOLOGY
	1. Technologically Feasible/ Cost Effective 2. Achieved in Practice	
POC	1. n/a 2. n/a	1. n/a 2. n/a
NO <sub>x</sub>	1. n/a 2. n/a	1. n/a 2. n/a
SO <sub>2</sub>	1. n/a 2. n/a	1. n/a 2. n/a
CO	1. n/a 2. n/a	1. n/a 2. n/a
PM <sub>10</sub>	1. Enclosure and vent to a baghouse w/ $\leq 0.01$ gr/dscf <sup>a</sup> 2. Water mist spray w/ $\geq 50\%$ control efficiency <sup>a</sup>	1. BAAQMD Approved Design and Operation <sup>a</sup> 2. BAAQMD Approved Design and Operation <sup>a</sup>
NPOC	1. n/a 2. n/a	1. n/a 2. n/a

**References**

<sup>a</sup> BAAQMD
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