

US EPA ARCHIVE DOCUMENT

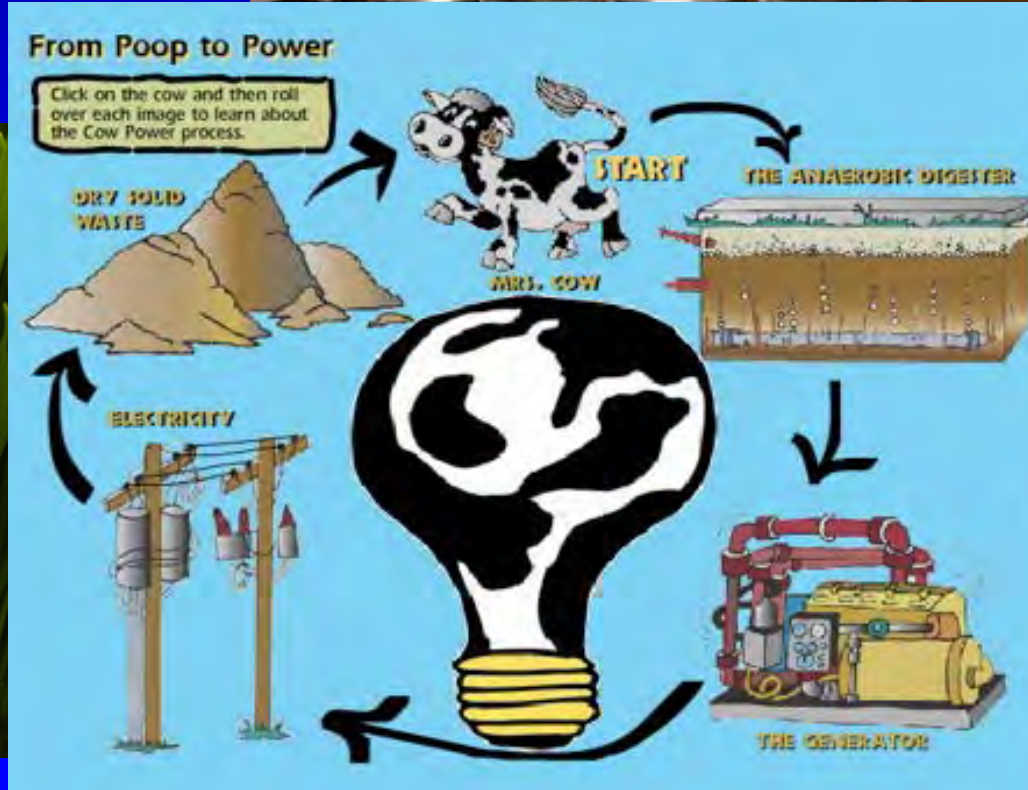
# *The Future of Biogas Engines in Extreme Ozone Non-Attainment Areas*



**September 18, 2013**

**David L. Rothbart, P.E., BCEE**

# Why Regulate Biogas Engines?



# *Why Regulate Biogas Engines?*



# Why Regulate Biogas Engines?

Ground level or "bad" ozone is not emitted directly into the atmosphere, but is created by chemical reactions of oxides of nitrogen (NO<sub>x</sub>) and volatile organic compounds (VOC) in the presence of sunlight.



# Ground-Level Ozone → SMOG

## Ground-Level Ozone:

- Reduces lung function and increases respiratory symptoms
- Causes increased susceptibility to respiratory infections
- May contribute to premature death, especially in people with heart and lung disease

## Clean Air Act:

- Created in response to serious smog incidents and to protect human health
- Established National Ambient Air Quality Standards (NAAQS)
- Requires EPA to review and, if appropriate, revise the NAAQS every five years

# Ozone Non-Attainment Areas

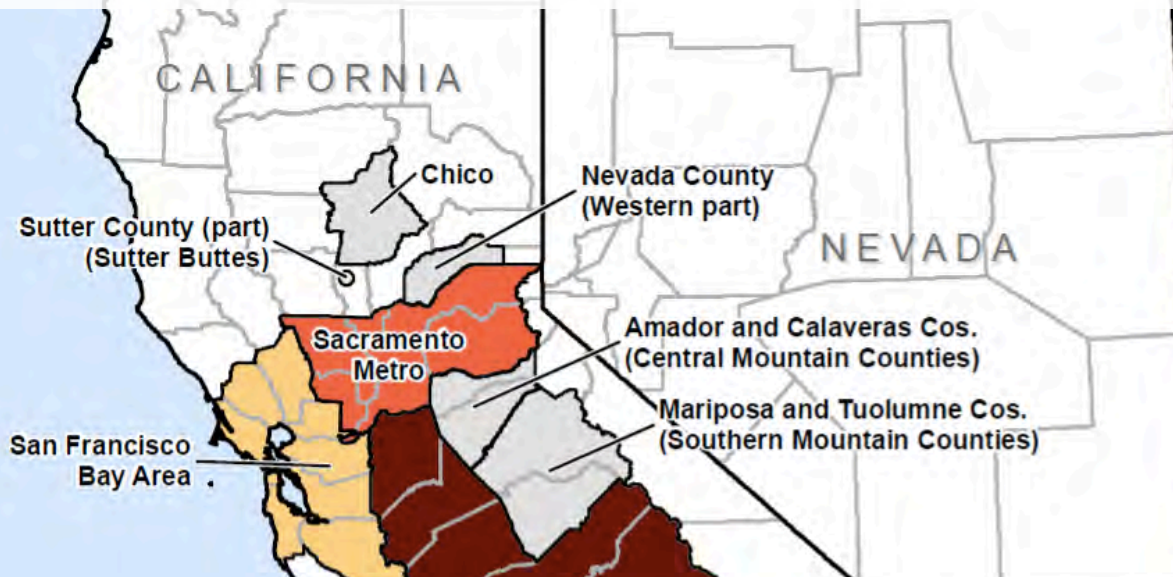
DESIGNATIONS FOR THE 1997  
8-Hour Ozone (O<sub>3</sub>)

## NATIONAL AMBIENT AIR QUALITY STANDARDS

- Nonattainment/Subpart 2/Extreme
- Nonattainment/Subpart 2/Severe-17
- Nonattainment/Subpart 2/Severe-15
- Nonattainment/Subpart 2/Serious
- Nonattainment/Subpart 2/Moderate
- Nonattainment/Subpart 2/Marginal
- Nonattainment/Subpart 1
- Unclassifiable/Attainment

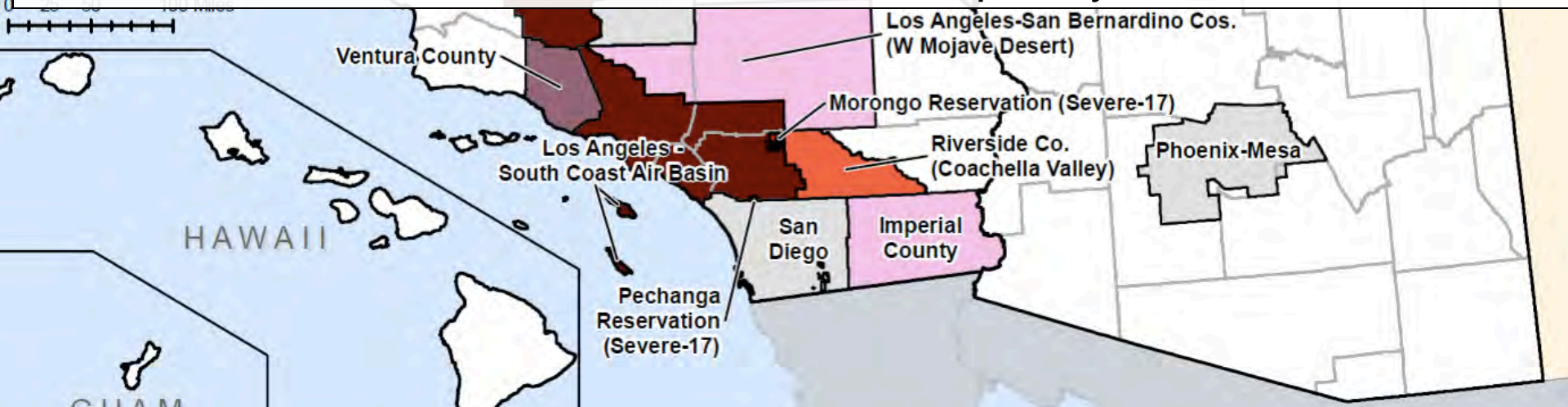
Sources: Title 40 CFR Part 81, §303, 305, 312, 329, 352, 353, 354 (2011), ESRI (2006), TANA (2006).

American Samoa and Northern Mariana Islands (not shown on map) are designated "Unclassifiable/Attainment."



## What does this mean?

NOx emissions must be reduced by about 80%  
in South Coast and San Joaquin by 2023



# Sources of Ozone Forming Emissions



Who is

Responsible?



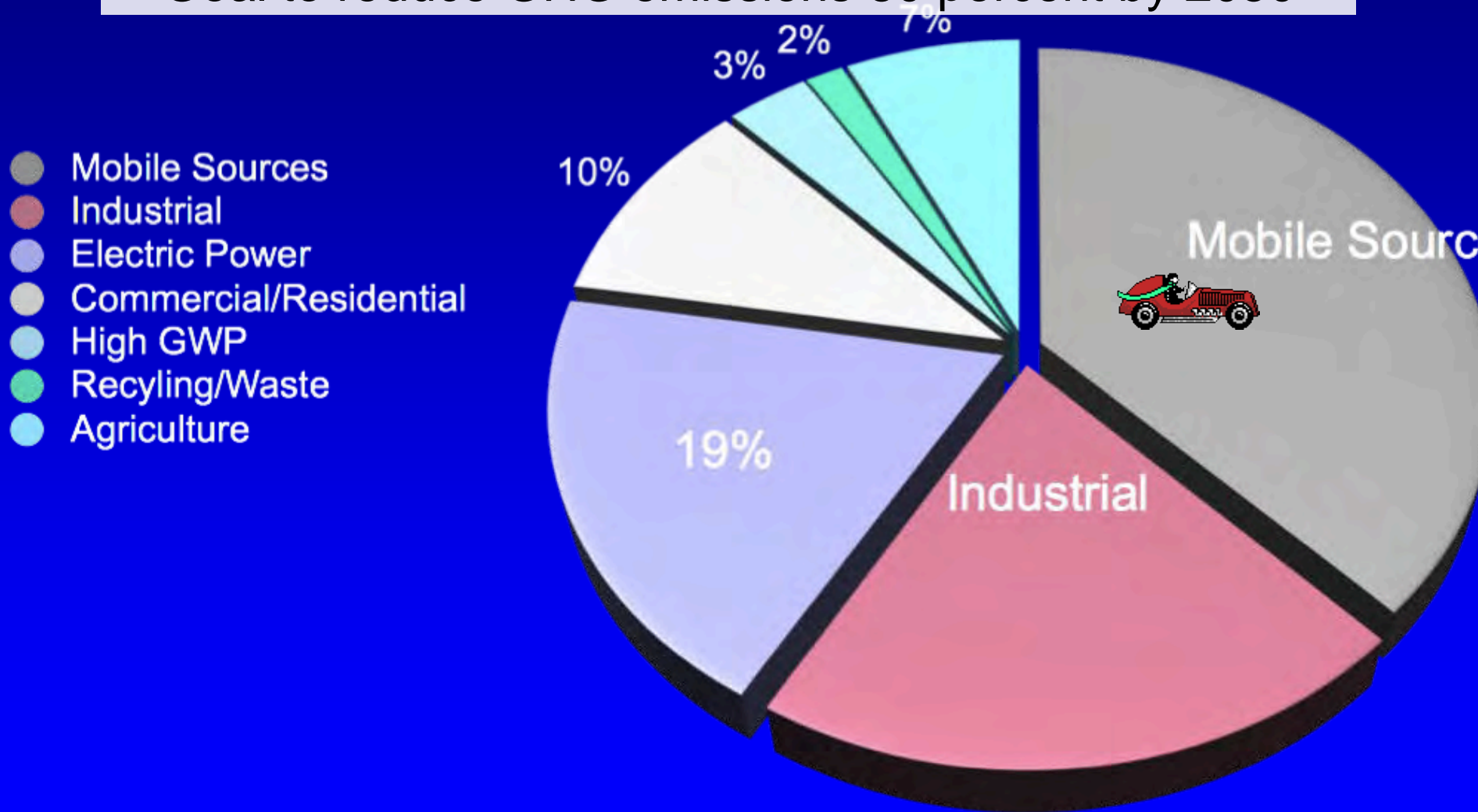


# *Sources of Ozone Forming Emissions*



# What About GHG Emissions?

Goal to reduce GHG emissions 80 percent by 2050



# *How to Climate Change Goals and Achieve Ozone Attainment?*

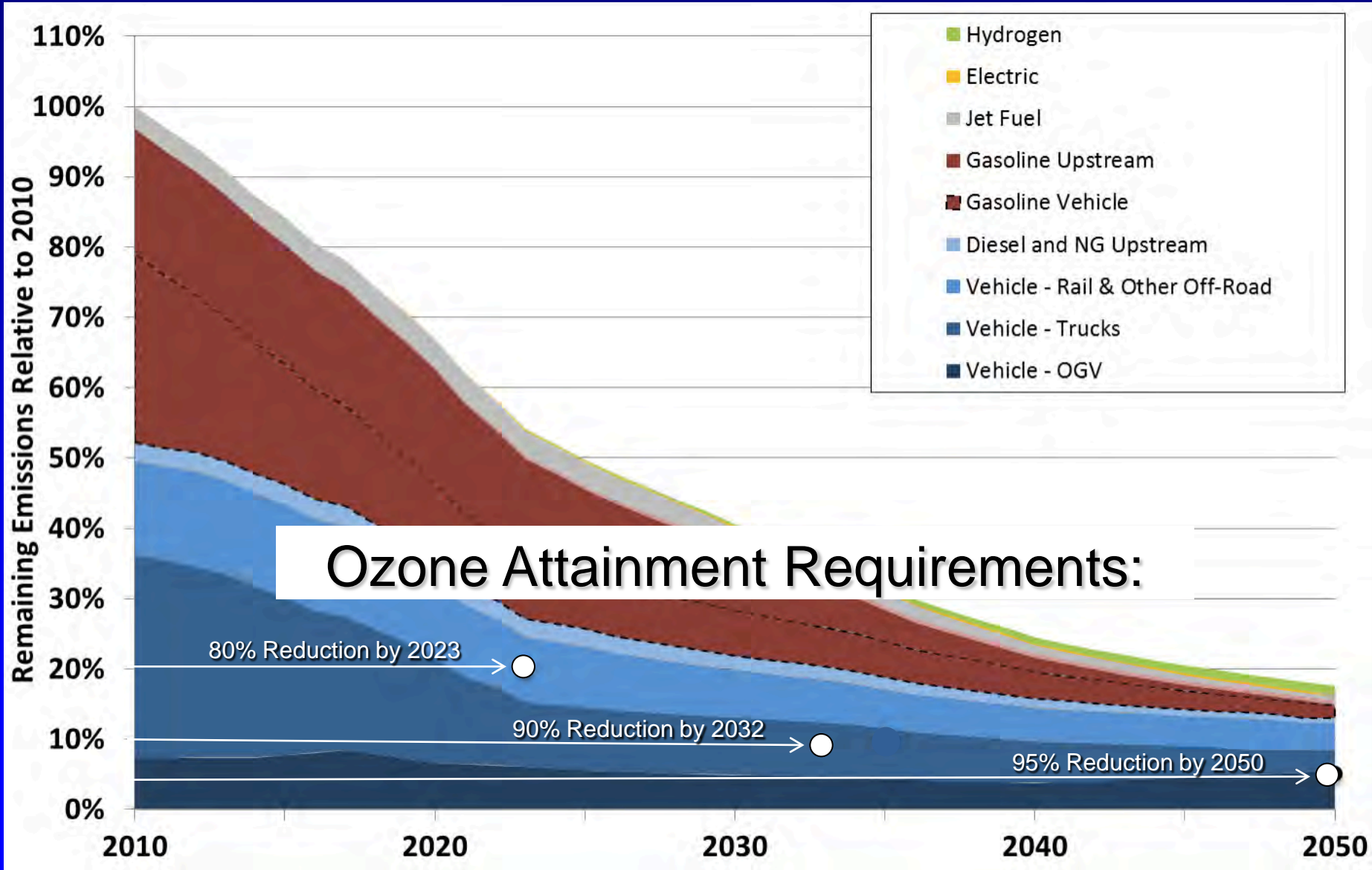
- CARB, SCAQMD & SJVAPCD's Vision Plan:
  - Coordinated solutions to air quality and climate goals
  - Deploy zero- and near-zero technologies
  - A combination of strategies — technology, energy, and efficiency — applied to each sector
  - Transformation of the upstream energy sector and its greenhouse gas and smog forming emissions concurrent with the transformation to advanced technologies downstream

# *How to Climate Change Goals and Achieve Ozone Attainment?*

- By 2040, all **passenger vehicles** sold in California are zero-emissions vehicles
- By 2050, **truck** fuel economy doubles and NOx emission standards are 80 percent below the current standards
- Nearly all future **locomotives** are zero-emission or near-zero emission such as hybrid-electric
- Future **jet engines** are 75 percent cleaner in terms of NOx emissions and all burn renewable jet fuel
- By 2050, all liquid fuels are derived from renewable feedstocks

# Vision Plan Scenario

## (Transportation Sector NOx Reductions)

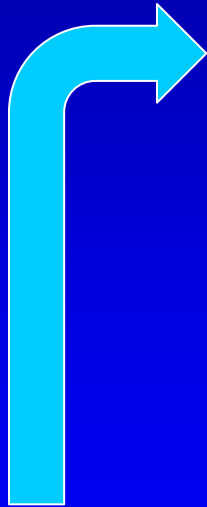


# *What about the Stationary Sources?*

- Stationary Sources should expect further reductions will be imposed to achieve ozone attainment standards
- Existing requirements included in the State Implementation Plan (SIP) cannot be relaxed
- Expect higher emitting sources of ozone forming emissions will be regulated
- Ozone attainment requirements outweigh climate change goals

# Biogas Engine Emissions SCAQMD Rule 1110.2

55x  
higher



74%  
reduction



Central Power Plants

Rule 1110.2  
Current Limits

Rule 1110.2  
2016 Limits

# SCAQMD Rule 1110.2

- Retrofit requirements imposed because biogas engine emissions were deemed to be high
- Current biogas NOx limit 36 ppmvd
- In 2011, the proposed limit was achieved using pretreatment, oxidation catalyst and SCR
- SCAQMD revised rule on September 7, 2012
- By January 1, 2016, existing biogas engines must reduce NOx emissions to 11 ppmvd

Difficult to achieve because  
biogas is not natural gas





# Siloxanes

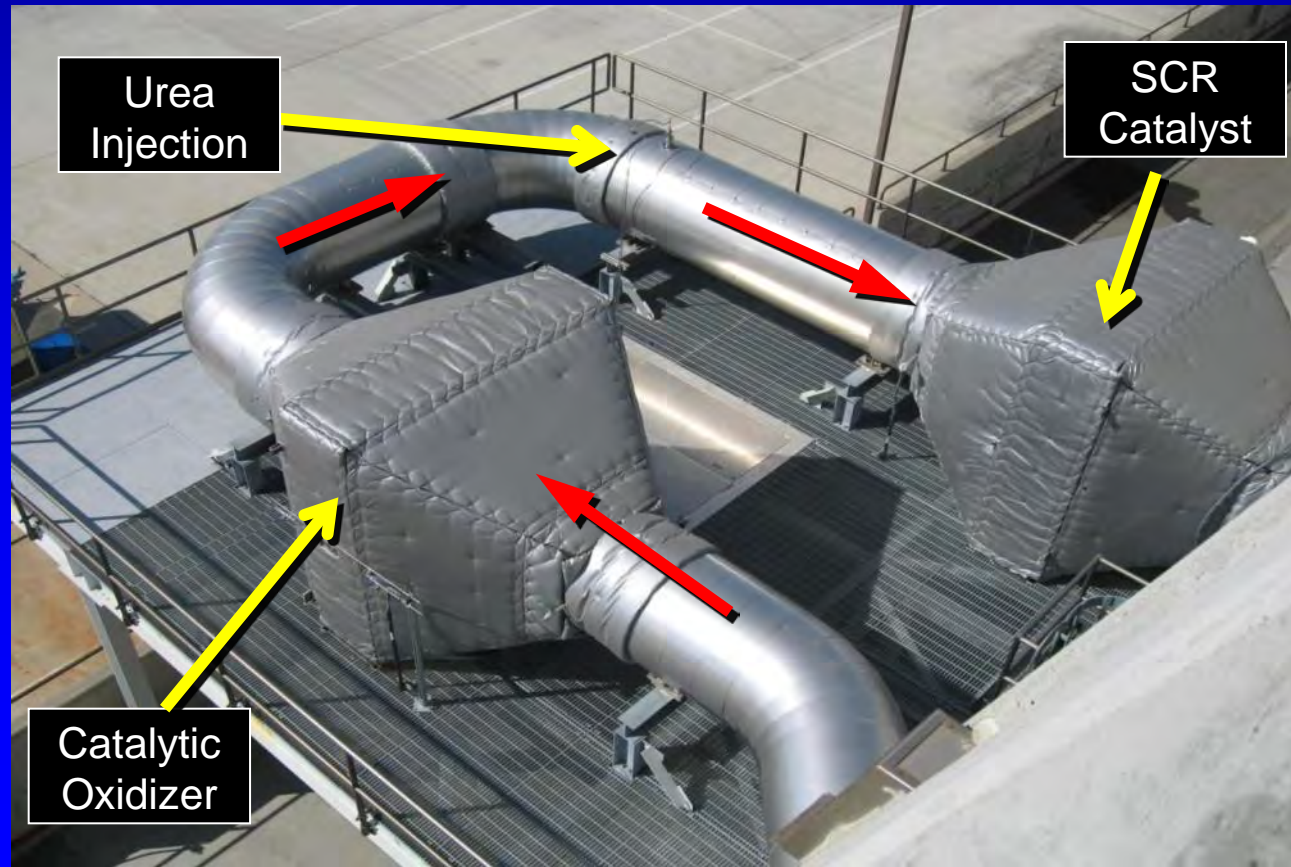
The hidden threat to biogas systems

*Ralph B. ("Rusty") Schroedel Jr.,  
Peter V. Cavagnaro, and Jerald W. Peterson*

# Biogas Engine Retrofit Options

## Catalytic Oxidizer/SCR

- Pretreatment needed
- Only proven retrofit technology
- Costly



# Biogas Engine Retrofit Options

## Selective Non-Catalytic Reduction

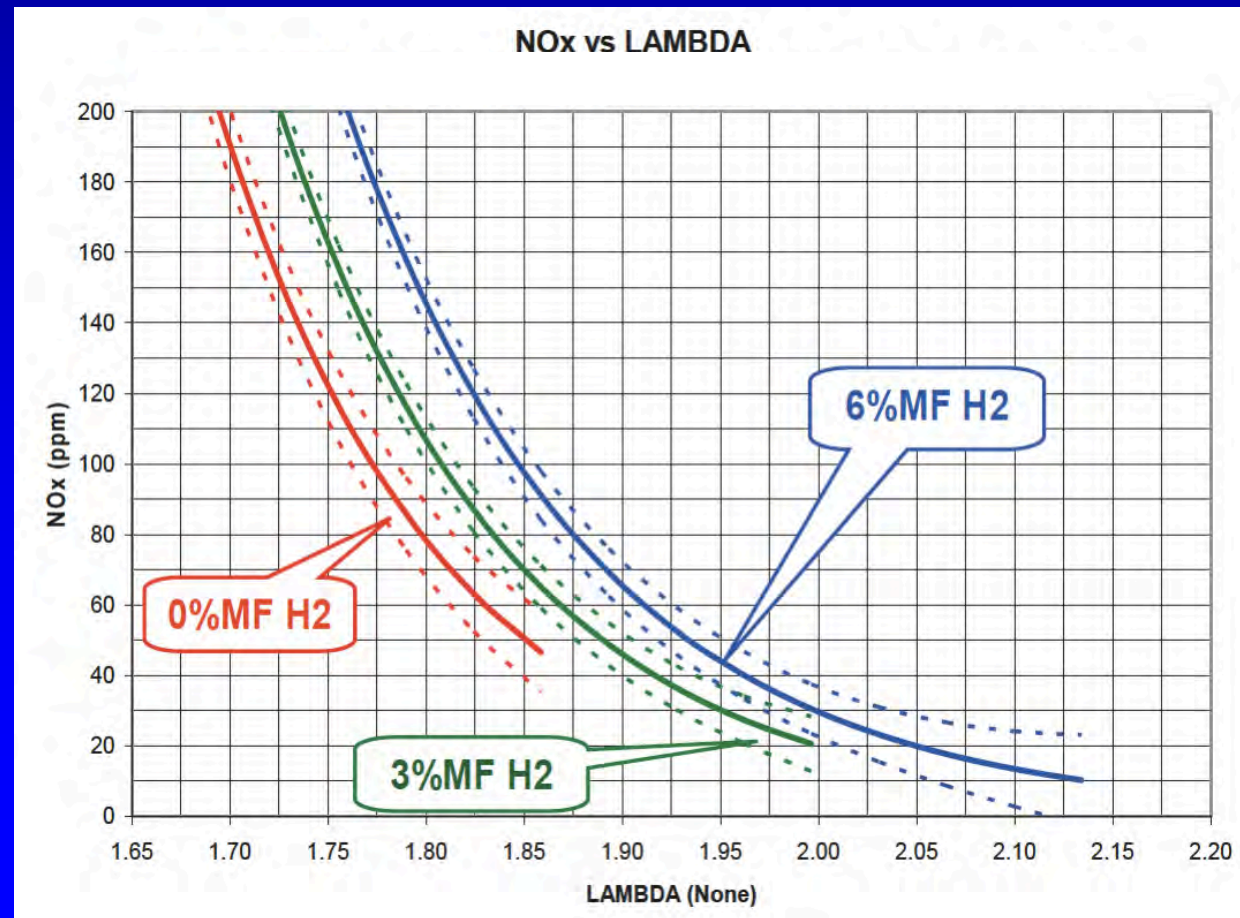
- No pretreatment needed
- Biogas demonstration to be completed by 2015
- Potentially Cost Effective



# Biogas Engine Retrofit Options

## Hydrogen Assisted Lean Operation

- No pretreatment needed
- Demonstration to be completed by 2015
- Potentially Cost Effective



# Other Compliance Options

## Shutdown Existing Biogas Engines by 2016 and:

- Replace with Fuel Cells or Turbines
  - May trigger BACT
  - Contaminant pretreatment needed
  - Costly
- Flare
  - Low or no capital expense
  - Waste of renewable fuel
- Pipeline Injection or Transportation Fuel
  - Few air regulations
  - Other biogas opportunities



# *Biogas Opportunities*

- Anticipated increased demand for renewable fuels
- Climate Change benefit
  - One of the lowest carbon emitting fuels\*
  - To achieve California's climate change goals, greater financial incentives may be necessary
- Ozone Formation
  - Potential for 90% reduction in NOx emissions

\* - Carbon intensity value of 11.26 for landfill gas compared to 99.18 (gCO<sub>2</sub>e/MJ) for gasoline

# Conclusions

- Stationary Source requirements are increasing the cost of biogas energy projects
- Without cost-effective retrofit options many biogas engines in South Coast will shutdown by 2016
- To achieve California's climate change goals, additional renewable fuel incentives may be required
- Ozone attainment will require significant lifestyle changes in California
- Ozone standards may not be achievable in the South Coast and San Joaquin Valley Air Basins

# Questions?



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