

Air Quality Update

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CARB REPORTING FOR FACILITIES WITH MEDIUM-SIZED REFRIGERATION SYSTEMS BEGINS

On March 1, 2014, the Annual Reports will be due for facilities with large and medium-sized refrigeration systems, refrigerant distributors, and reclaimers subject to the California Air Resources Board's (CARB's) Refrigerant Management Program (RMP). This includes reporting for refrigeration systems with greater than 200 pounds of refrigerant. CARB's refrigerant program does *not* apply to HVAC systems, which are typically used for comfort cooling.

Facilities with large and medium-sized refrigeration systems are also required to pay their annual implementation fee by March 1, 2014. The CARB online Refrigerant Registration and Reporting tool, known as R3, can be accessed via the following URL: <https://ssl.arb.ca.gov/rmp-r3/index>

This year, facilities with medium-sized (200-2,000 pounds) refrigeration systems must register and report for the first time.

As part of the California Global Warming Solutions Act of 2006 (AB 32), CARB adopted a regulation in 2009 to reduce greenhouse gas (GHG) emissions from stationary sources through refrigerant leak detection and monitoring, leak repair, system retirement and retrofitting, reporting and recordkeeping, and proper refrigerant cylinder use, sale, and disposal. High-global warming potential (GWP) refrigerants, such as chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs), hydrofluorocarbons (HFCs), and perfluoro-

carbons (PFCs), are used in a large variety of refrigeration and air conditioning systems.

CARB's program is designed to: 1) reduce emissions of high-GWP GHG refrigerants from leaky stationary, non-residential refrigeration equipment, 2) reduce emissions from the installation and servicing of refrigeration and air conditioning appliances using high-GWP refrigerants, and 3) verify GHG emission reductions. The regulation requirements include registration, refrigerant leak detection and monitoring, leak repair, reporting and recordkeeping, system retrofit or retirement planning, required service practices, and refrigerant distributor, wholesaler, and reclaimer prohibitions, recordkeeping, and reporting.

The RMP requires that all facilities with large-sized refrigeration systems (i.e., those with 2,000 pounds of refrigerant or more) submit their next Annual Report by March 1, 2014, for their 2013 refrigeration system leak inspections, leak repairs, and other system servicing. Medium-sized refrigeration facilities (i.e., those facilities whose largest system is 200 pounds or more but less than 2,000 pounds) must submit their registration and first Annual Report by March 1, 2014, for their 2013 refrigeration system leak inspections, leak repairs, and other system servicing. The payment of the annual implementation fee is also due by March 1 for both the large and medium-sized facilities.

Refrigerant distributors, wholesalers, and reclaimers are also required to submit an Annual Report of their 2013 aggregated annual refrigerant sales, transactions, and disposal by the March 1, 2014, due date.

For more details on the requirements of the regulation, please visit the program web page at the following URL: <http://www.arb.ca.gov/stoprefrigerantleaks>

Air Quality Tip

When performing organic leak testing on fugitive components that is required to demonstrate compliance with rules or permit conditions, make sure your testing contractor is calibrating the portable volatile organic compound (VOC) analyzer to the level required. For example, if the requirement is to test for leaks less than 10,000 ppm, your contractor should be calibrating the instrument with 10,000 ppm calibration gas; if your testing contractor uses a 25,000 ppm calibration standard, the local air district could issue a Notice of Violation.

Upcoming Training Offered by Yorke Engineering:

- Bay Area Air Quality Regulations, Permitting, & Compliance Seminar: April 23 – April 24, 2014
<http://www.yorkeengr.com/AirQualityClasses.htm>

Upcoming Due Dates for 2014

- USEPA GHG Report.....3/31
- CARB GHG >25K Metric Tons....4/10
- CARB GHG 10-25K Metric Tons & All Electric Retailers6/2
- CARB GHG SF6 Switchgear6/2
- CARB GHG Verification9/2
- CARB PERP Equipment Units Annual Report3/1
- CARB In-Use Off-Road DV* Report for Large Fleets3/1
- Semi-Annual Title V ReportSemi-Annually
- Annual Title V Compliance Certification Annually
- Title V – Application for Permit Renewal – Due 180 Days Prior to Permit Expiration

*Diesel Vehicle

BAAQMD RULE CHANGES ADOPTED

■ Regulation 9, Rule 10 – *Inorganic Gaseous Pollutants: Nitrogen Oxides and Carbon Monoxide from Boilers, Steam Generators and Process Heaters in Petroleum Refineries:*

Amendments to this rule were recently adopted to allow for a new, voluntary alternative NO_x mass emission limit compliance plan for heaters currently subject to the daily average NO_x limit of 0.033 pounds of NO_x per million Btu of heat input, to increase continuous emissions monitoring system (CEMS) coverage on the same heaters, and to add a new reporting requirement for refinery operators to provide data on burners in each heater so that the District can evaluate the potential for further NO_x reductions from these heaters.

Refineries choosing the option of the Alternate NO_x Compliance Plan (ANCP) rather than the daily average NO_x limit of 0.033 pounds of NO_x per million Btu of heat input will be subject to a daily total NO_x mass emission limit for all subject heaters. This limit will be based on the sum of the baseline NO_x daily emissions from each device in pounds of NO_x.

The newly adopted amendments also require each refinery subject to Section 9-10-301 or 308 to monitor at least 95% of the NO_x emissions from pre-1994 heaters, on a mass basis, with a CEMS, and to submit a monitoring plan for the installation of NO_x CEMS on these boilers, steam generators, or process heaters by April 16, 2014. Refineries subject to Section 9-10-301 or 308 are also required to submit information on the make, model, and emission rates for all burners in each boiler, steam generator, or process heater by April 16, 2014. The monitoring plan is to be approved by

the Air Pollution Control Officer (APCO) by October 16, 2014.

The latest version of Regulation 9, Rule 10 is found at the following URL: <http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/Rules%20and%20Regs/reg%2009/RG0910.ashx?la=en>

■ **Regulation 6, Rule 4 – *Metal Recycling and Shredding Operations:*** The newly adopted rule applies to metal recycling facilities with metal throughput of 1,000 tons or more per rolling 12-month period. The rule is designed to reduce fugitive emissions of particulate matter.

Metal recycling operations that have a metal throughput of more than 50,000 tons of metal scrap in a rolling 12-month period and that operate a metal shredder or receive or process scrap containing shredded metal must develop and implement an Emissions Minimization Plan (EMP). The EMP details management practices, measures, equipment, and procedures that are employed or will be implemented to minimize fugitive emissions. The EMP must be submitted to the APCO no later than May 1, 2014.

Facilities with a metal throughput of 50,000 tons or less per rolling 12-month period or that do not conduct shredder operations are *not* required to submit an EMP, but they are required to maintain records of the annual throughput of scrap metal recycled on a 12-month rolling average and of the basis for the throughput determination for a minimum of 5 years.

The latest version of Regulation 6, Rule 4 is found at the following URL:

<http://baaqmd.gov/~media/Files/Planning%20and%20Research/Rules%20and%20Regs/reg%2006/RG0604.ashx?la=en>

■ **Regulation 12, Rule 13 – *Foundry and Forging Operations:*** The newly adopted Regulation 12, Rule 13 applies to furnaces or ovens permitted by the District that are operated at a foundry or forge that processes at least 1 ton of metal per rolling 12-month period. Similar to Regulation 6, Rule 4, this rule is also designed to reduce fugitive emissions of particulate matter, in addition to odorous emissions.

Facilities that melt or heat-treat more than 2,500 tons of metal, other than certain aluminum metals and alloys, in a rolling 12-month period are required to submit an EMP to the APCO no later than May 1, 2014. In addition to minimizing fugitive emissions of particulate matter, the EMP for these facilities must also focus on minimizing odorous substances.

Facilities or furnaces that melt or heat-treat 2,500 tons or less of metal per rolling 12-month period *or* that melt only clean aluminum scrap or specific pure metals or alloys are exempt from the EMP requirement. However, they are required to document/demonstrate eligibility for the exemption.

The latest version of Regulation 12, Rule 13 is found at the following URL:

<http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/Rules%20and%20Regs/reg%2012/rg1213.ashx?la=en>

Yorke Engineering, LLC specializes in air quality and environmental consulting for stationary and mobile sources, including dispersion modeling, health risk assessments, permitting, emission inventories, air quality compliance systems, etc. Yorke Engineering has assisted over 350 customers, including a wide variety of industrial facilities and government organizations throughout California.