

Air Quality Update

Brought to you by YORKE ENGINEERING, LLC.

www.YorkeEngr.com

February 1, 2013 – SCAQMD

CARB REPORTING FOR FACILITIES WITH 10,000 TO 25,000 METRIC TONS BEGINS

All facilities that have not previously been required to report their greenhouse gas (GHG) emissions and emitted between 10,000 and 25,000 metric tons (MT) of carbon dioxide equivalent emissions (CO₂e) in 2012 are required to prepare abbreviated 2012 emission reports by June 1, 2013. The California Air Resources Board (CARB) estimates an additional 150-200 facilities will be required to submit abbreviated reports.

For facilities required to submit abbreviated reports for the first time, registration is required to set up the California electronic greenhouse gas reporting tool (Cal e-GGRT). Registration is suggested to be completed by April. This process requires a signed and dated certification statement by the designated representative of the facility. More information on Cal e-GGRT can be found here:

<http://www.arb.ca.gov/cc/reporting/ghg-rep/tool/ghg-tool.htm>

For most new facilities required to submit abbreviated emission reports, the facility's emissions will be determined based on the total annual fuel usage at the facility. Therefore, in many cases, the gas bills will be the main source used to calculate GHG emissions. More detailed guidance can be found on the CARB website:

<http://www.arb.ca.gov/cc/reporting/ghg-rep/guidance/guidance.htm>

CARB GHG CAP-AND-TRADE UPDATE

CARB approved the Cap-and-Trade

program on December 16, 2010, under Assembly Bill 32, the Global Warming Solutions Act (AB 32). Additional amendments were passed on November 2, 2012, revising the initial Cap-and-Trade program and adding further clarification and updates on facility reporting requirements based on emission thresholds.

Starting in 2013, all GHG emitting facilities with non-biogenic GHG emissions equal to or greater than 25,000 MT will be required to cover their emissions with allowances or offset emissions credits. The first compliance obligation deadline for the 2013 emissions is November 1, 2014.

Also, the CARB February 2013 auction is scheduled to take place on February 19th from 10 a.m. to 1 p.m. The application deadline for the auction is January 22nd. There will be both 2013 and 2016 vintage allowances available at auction.

Reporting deadlines are June 1, 2013, for electric entities that do not generate and April 10, 2013, for all other facilities and suppliers subject to Cap-and-Trade.

EPA GHG UPDATE

The Environmental Protection Agency (EPA) recently passed new regulations that will require additional data elements for the 2010 and 2011 GHG emission reports to be added to the 2012 GHG emission reports due March 31st. Examples include non-default heating values, or measured carbon content of fuels used to calculate combustion GHG emissions from various sources. For more information, visit: <http://www.epa.gov/ghgreporting/reporters/index.html>

Air Quality Tip

South Coast Air Quality Management District (SCAQMD) Rule 205 mandates that Permits to Construct (PTCs) expire 1 year from the date of issuance. If your new source has been constructed, following notification to the air district (as specified in Rule 202), the PTC serves as a Temporary Permit to Operate until the Permit to Operate is granted. If installation/construction is going to take longer than 1 year, be sure to apply for and gain approval for an extension to your PTC.

Upcoming Training:

- South Coast Air Quality Permitting and Compliance Seminar:
May 14 – May 15, 2013
<http://www.yorkeengr.com/AirQualityClasses.htm>
- UCI Extension Air Quality Permitting and Compliance – Spring Quarter
<http://unex.uci.edu/courses>
(see Environmental Management)

Upcoming Due Dates for 2013:

- SCAQMD AER3/5
- RECLAIM APEP (Cycle 1).....3/1
- USEPA GHG Report3/31
- CARB GHG >25K Tons.....4/10
- CARB GHG 10-25K Tons
and >25K Tons Electric6/1
- CARB PERP Annual Reports3/1
- CARB On-Road Heavy-Duty
DV* Phase-In Report.....1/31
- CARB In-Use Off-Road
DV* Report3/1
- RECLAIM Quarterly (Cycle 2) ...1/30
- Title V – 500-SAM2/28
- Title V – 500-ACC3/1
(Except RECLAIM Cycle 2..... 8/29)
- Title V – Application for Permit
Renewal – Due 180 Days Prior to Per-
mit Expiration

*Diesel Vehicle

SCAQMD RULE CHANGES ADOPTED

For full details on rule adoption changes below, go to:

<http://www.aqmd.gov/rules/recentrules.html>

■ Rule 1110.2: *Emissions from Gaseous- and Liquid-Fueled Engines*

Rule 1110.2 was recently amended on September 7, 2012, to further increase efforts aimed at reducing oxides of nitrogen (NO_x), volatile organic compounds (VOCs), and carbon monoxide (CO) from all stationary and portable engines over 50 horsepower that are subject to this rule. The amended changes to Rule 1110.2 include:

➤ Delayed implementation and extension of the earlier established (existing rule) emission concentration limits for any stationary landfill/digester gas/biogas-fired engines to January 1, 2016, deadline.

➤ Refund of permit application fees for any biogas engine operator(s) in compliance with established emission limits by January 1, 2015.

➤ Removal of the percent of natural gas burning constraints on engines complying with the emission concentration limits outlined in the rule.

➤ Establishing that concentration limits as outlined in Table 3 do not apply to engines operating less than 500 hours/year or using less than 1x10⁹ BTUs/year (higher heating value) of fuel.

➤ Addition of a biogas engine emission compliance option, which allows the operator to demonstrate compliance with the NO_x and/or CO emission limits by utilizing and setting forth a longer averaging time, provided the operator demonstrates through Continuous Emissions Monitoring System (CEMS) data that the

engine is achieving a NO_x concentration at or below 9.9 ppmv and 225 ppmv for CO (if CO is elected) for averaging each corrected to 15% O₂ over a 4-month time period.

➤ The time averaging provisions are not available if the CEMS is time-shared by multiple biogas engines.

➤ If a source is operating under a monthly (or 750-hour) emissions monitoring schedule and an operator must make an Air-to-Fuel Ratio Controller (AFRC) set point adjustment after the initial emissions check to document compliance with permitted conditions, instead of having to switch to a weekly/150-hour schedule, the source can now continue operating under a monthly/750-hour schedule after a subsequent emissions check.

■ Rule 218.1: *Continuous Emission Monitoring Performance Specifications*

On May 4, 2012, Rule 218.1 was amended to provide additional clarification for CEMS certification, performance specifications, and technical requirements for CEMS operations and maintenance. The rule amendments include elimination of the 24-hour Calibration Error (CE) daily testing requirements on any day the underlying equipment is not operated; this aligns Rule 218 CEMS calibration requirements on days of non-operation with those for CEMS in the Regional Clean Air Incentives Market (RECLAIM) program. Additional amendments to the existing rule include:

➤ Updating the American Society for Testing and Materials (ASTM) reference for the test method to measure sulfur in petroleum products.

➤ Correcting typographic errors.

SCAQMD RULE CHANGES PROPOSED

For full details on proposed rule changes below, go to:

<http://www.aqmd.gov/rules/proposed.html>

■ Proposed Amended Rule 219: *Equipment Not Requiring a Written Permit Pursuant to Regulation II*

Rule 219 identifies equipment, processes, or operations that emit small amounts of air contaminants not requiring written permits. Proposed amendments to Rule 219 include the identification and addition of several new equipment sources to the outlined equipment list of devices not requiring a Permit to Operate, as well as additional clarification and updates to the existing rule.

■ Proposed Amended Rule 222: *Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II*

The purpose of Rule 222 is to provide an alternative to written permits. Proposed Rule 222 amendments seek to provide additional oversight on rule applicability, expand existing definitions to include newly identified equipment sources, and provide revision and clarification to rule requirements.

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 300 customers, including a wide variety of industrial facilities and government organizations throughout California.