

Air Quality Update

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DIESEL OFF-ROAD REPORTING REQUIREMENTS FOR MEDIUM FLEETS BEGINS IN 2016

13 CCR §2449 – General Requirements for In-Use Off-Road Diesel-Fueled Fleets

All fleets were required to provide initial reporting of their fleet back in 2009, or within 30 days after the fleet was brought into California, whichever was later. Subsequent reporting deadlines are based on the fleet size, as shown in the below table.

Table 1: Fleet Compliance Due Dates

Fleet Category	Total Fleet HP	Reporting Due Dates	Performance Due Dates
Large	> 5,000 hp	Mar. 1: 2012-2023	Jan. 1: 2014*-2023
Medium	2,501-5,000 hp	Mar. 1: 2016-2023	Jan. 1: 2017-2023
Small	< 2,500 hp	Mar. 1: 2018-2028	Jan. 1: 2019-2028

*2014 performance requirements for large fleets were due July 1, 2014.

Large fleets, defined as having more than 5,000 total fleet horsepower (hp), were required to begin annual reporting in 2012 and continue annually until at least 2023. Performance requirements for large fleets began July 1, 2014, and continues annually by January 1st from 2015 through 2023.

Medium fleets, defined as having a total fleet size of 2,501 to 5,000 hp, must report their January 1, 2016, fleet status by March 1, 2016, and continue annually until at least 2023. Performance requirements for medium fleets begins in 2017 and annually thereafter through 2023.

Small fleets, defined as having a total fleet size of 2,500 hp or less, have annual reporting due from 2018 through

at least 2028 and their performance requirements are due from 2019 through 2028.

Annual reporting is done by submitting a Responsible Official Affirmation Reporting (ROAR) form. By having the Responsible Official (or Designee) sign a ROAR, they are indicating that the fleet information in the Diesel Off-Road Online Reporting System (DOORS) is accurate. Updates to the fleet can be done online in DOORS or with paper forms. A designee may be assigned by the Responsible Official at any time with a Designated Official form.

Reporting beyond the 2023 (large and medium fleets) or 2028 (small fleets) due dates will be necessary for fleets that do not meet the final fleet average target, which could be as a result of utilizing the Best Available Control Technology (BACT) annual rate compliance method and/or only meeting the fleet average target with low-use reporting.

Performance requirements can be met in one of two ways, either through meeting the fleet average target or via BACT annual rate. Companies may switch between the two compliance methods as they like. The fleet average target is specific to the fleet makeup, based on the fleet category and individual equipment horsepower and emission factor (tier). The BACT annual rate requirements are based on the fleet size and compliance year. Compliance checks with both methods are done within DOORS. Compliance planning for future years can be done with the aid of the planning tool created by the California Air Resources Board (CARB).

Air Quality Tip

The CARB Refrigerant Management Program requires that all facilities whose largest refrigeration system is a small system (those containing more than 50 pounds but less than 200 pounds) are required to register for the first time by March 1, 2016. Small facilities are not required to file an Annual Report or pay the Annual Implementation Fee. The CARB online Refrigerant Registration and Reporting tool, known as R3, can be accessed via: <https://ssl.arb.ca.gov/rmp-r3/>.

Upcoming Training Offered by Yorke Engineering

- South Coast Air Quality Regulations, Permitting, and Compliance Seminar: April 5 – April 6, 2016
<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 2016*

- SCAQMD AER 3/1
- SCAQMD Rule 1110.2 Quarterly 4/15
- USEPA GHG Report 3/31
- CARB GHG > 25K Metric Tons 4/11
- CARB GHG 10-25K Metric Tons and All Electric Retailers 6/1
- CARB GHG SF₆ Switchgear 6/1
- CARB In-Use Off-Road Diesel Vehicle Annual Reporting for Medium and Large Fleets 3/1
- CARB PERP Equipment Units Annual Report 3/1
- CARB Refrigerant Registration (Small) and Reporting (Medium/Large) 3/1
- RECLAIM Quarterly (Cycle 2) 4/30
- RECLAIM APEP (Cycle 1) 2/29
- Title V – 500-SAM 2/28
- Title V – 500-ACC 3/1 (Except RECLAIM Cycle 2 8/29)
- Title V – Application for Permit Renewal – Due 180 Days Prior to Permit Expiration

*All due dates listed are the statutory dates; sometimes dates are extended when they fall on a weekend/holiday.

SCAQMD PROPOSED RULE CHANGES

For full details on changes below, go to: <http://www.aqmd.gov/home/regulations/rules/proposed-rules>

▪ Rule 1110.2: Emissions from Gaseous- and Liquid-Fueled Engines

South Coast Air Quality Management District (SCAQMD) Rule 1110.2 regulates oxides of nitrogen (NO_x), carbon monoxide (CO), and volatile organic compound (VOC) emissions from liquid and gaseous-fueled internal combustion engines that produce more than 50 rated brake horsepower (bhp). The SCAQMD is proposing several important amendments to this rule.

Significantly, the proposed rule defines “breakdowns” with NO_x or CO emissions above an Excess Emission Threshold, limits such breakdowns to no more than three per calendar quarter, and places stringent reporting and corrective actions to qualify such a breakdown as opposed to a violation of the rule.

Other proposed changes to the rule include:

- Extending the effective date for compliance to January 1, 2017, for all biogas engines;
- Extending the effective date for compliance to January 1, 2018, for demonstration project biogas engines;
- Providing an alternate compliance option to provide operators additional time for engine retrofits beyond the proposed compliance date with the submittal of a compliance plan and payment of a compliance flexibility fee;
- For biogas engines operating until the compliance date for the applicable limits specified in rule, the emission thresholds for breakdowns that will count toward the incidence are 185 parts per million

by volume (ppmv) for NO_x and 2000 ppmv for CO;

- Clarifications to inspection and monitoring requirements have been made to improve readability and enforcement;
- To address the U.S. Environmental Protection Agency’s (EPA’s) concerns regarding breakdowns and potential excess emissions, the SCAQMD is proposing that within any calendar quarter, a facility operator would be allowed up to three incidences of breakdown per engine of NO_x emissions that exceed 45 ppmv for lean-burn engines and 150 ppmv for rich-burn engines. For CO emissions, no more than three incidences of breakdown per quarter would be allowed that are above 250 ppmv for lean-burn engines and 2000 for rich-burn engines; and
- An alternative rule proposal has been included that would remove rule language stating that breakdowns are not violations and add suggested U.S. EPA language making clear that breakdowns would subject operators to potential federal enforcement action or citizen lawsuits.

▪ Rule 1430.1: Control of Emissions from Grinding Operations at Forging Facilities

The SCAQMD has initiated the process of drafting a new rule to control emissions from grinding operations at metal forging facilities. Currently, 22 metal forging facilities operate within the SCAQMD jurisdiction. Of those, the majority have grinding operations within their facility.

Grinding operations are the focus of proposed Rule 1430.1. The SCAQMD evaluated “billet and ingot preparation,” including cutting and sawing, grinding and buffing, and heat treating. The SCAQMD also evaluated “forging,” including hot billet or ingot moving, lubricant use, and forging. Lastly, the SCAQMD evaluated “finishing operations,” including abrasive blasting, grinding, cutting, and buffing.

Ultimately, the SCAQMD decided the following:

- Cutting, sawing, grinding, and buffing during the billet or ingot preparation were potential sources of fugitive metal emissions if not adequately controlled; and
- Cutting, sawing, grinding, and buffing during “finishing operations” were potential sources of fugitive metal emissions if not adequately controlled.

The SCAQMD further concluded other aspects of metal forging were adequately covered by existing SCAQMD Rules 1140, 1144, 1146, and 1147 and no further regulatory action was recommended at this time.

Because the SCAQMD has not yet proposed any specific emission limits, recordkeeping, or operational limitations for the operations noted as having a potential for fugitive metal emissions, Yorke Engineering suggests facilities that may be subject to this proposed rule contact the SCAQMD and be placed on the notification list for upcoming rule development workshops. In addition, Yorke Engineering will continue to monitor the development of this rule.

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