

Air Quality Update

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NEW REPORTING AND LABELING REQUIREMENTS FOR LARGE SPARK-IGNITION EQUIPMENT

In July 2016, the California Air Resources Board (CARB) amended and approved the Large Spark-Ignition (LSI) Engine Fleet Requirements Regulation, which now includes new reporting and labeling requirements. Except for small fleets (1-3 forklifts and/or 1-3 non-forklifts), the LSI regulation applies to operators of off-road LSI engine forklifts, sweepers/scrubbers, industrial tow tractors, or airport ground support equipment with engines of 25 horsepower or greater with a displacement greater than 1.0 liter.

Except for small fleets, the initial reporting deadline is June 30, 2017, and will continue between June 1st and June 30th annually through 2023. Although the LSI regulation is for non-diesel equipment, reporting will be done via the Diesel Off-Road Online Reporting System (DOORS)*, the same reporting system as the diesel off-road regulation. Equipment Identification Numbers (EINs) will be assigned in DOORS for each piece of LSI equipment. EINs need to be labeled on equipment by June 30, 2017.

Fleet average requirements for the LSI rule remain unchanged. Medium forklift fleets (4-25 forklifts), large forklift fleets (26+ forklifts), and non-forklift fleets (4+ non-forklifts) should not exceed the 2013 Fleet Average Emission Level (FAEL) standards. Small fleets are still exempt from FAEL standards, as well as from reporting and labeling requirements.

Limited hours use (LHU) equipment that operated less than 200 hours in the preceding calendar year are included in the fleet size determination, but can be

excluded from the FAEL calculations. LHU equipment must be equipped with a non-resettable hour meter, and usage records must be maintained and reported annually.

*DOORS can be accessed via:
https://ssl.arb.ca.gov/ssldoors/doors_report_in/doors_login.html

PERP AND PORTABLE ENGINES: PLANNED AMENDMENTS TO FLEET AVERAGE EMISSION STANDARDS

In December 2015, CARB issued an advisory to inform owners/operators of engines subject to either the Airborne Toxic Control Measure (ATCM) for Diesel Particulate Matter from Portable Engines Rated at 50 Horsepower and Greater and/or the Statewide Portable Equipment Registration Program (PERP) Regulation that amendments are underway for the upcoming 2017 and 2020 fleet average emission standards for diesel particulate matter (DPM). The 2017 and 2020 standards are part of a series of fleet average emission standards that require more stringent standards for DPM, with the first of the standards effective as of January 1, 2013.

The planned amendments are triggered by CARB's determination that widespread compliance with the 2017 and 2020 fleet average standards for DPM may not be feasible. The 2013 fleet average emission standard is still in effect, and the next fleet average reporting is due March 1, 2017. In anticipation of the upcoming amendments, CARB may relax enforcement of the current 2017 standard; see the advisory posted on CARB's website here:
<http://www.arb.ca.gov/enf/advs/advs347.pdf>

Currently, CARB is holding multiple workshops to discuss the proposed

amendments. The rulemaking process is estimated to begin in early 2017. The requirements prohibiting the use of Tier 0 emergency and low-use engines take effect January 1, 2017, and are not expected to change with the planned amendments.

Air Quality Tip

Facilities that hold a Title V Operating Permit must renew their permit every 5 years. A complete renewal application is due to the District no sooner than 545 days and no later than 180 days before the current permit expires. Be sure to keep an eye on when your facility Title V permit expires and allow enough time to perform the necessary reviews, including any regulatory or facility changes since the prior permit issuance, and to prepare the application forms to submit to the District on time.

Upcoming Training Offered by Yorke Engineering

- South Coast Air Quality Regulations, Permitting, and Compliance Seminar: October 4 – October 5, 2016
- California Multi-Media Environmental Regulations: Permitting, Compliance, and Reporting Seminar: October 25 – October 26, 2016
<http://www.yorkeengr.com/AirQualityClasses.htm>

Upcoming Due Dates for 2016/2017

- SCAQMD 1110.2 Quarterly..... 10/15/2016
- CARB GHG Verification9/1/2016
- CARB GHG Cap-and-Trade Annual Compliance Surrender..... 11/1/2016
- CARB On-Road Heavy-Duty Diesel Vehicle Reporting for Flexibility Options.....1/31/2017
- RECLAIM Quarterly (Cycle 1 and 2)..... 10/30/2016
- RECLAIM APEP (Cycle 2) 8/29/2016
- Title V – 500-SAM..... 8/31/2016
- Title V – 500-ACC 3/1/2017 (Except RECLAIM Cycle 2 8/29/2016)
- Title V – Application for Permit Renewal – Due 180 Days Prior to Permit Expiration

SCAQMD PROPOSED RULE CHANGES

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

▪ Rule 1402: Control of Toxic Air Contaminants from Existing Sources

South Coast Air Quality Management District (SCAQMD) Rule 1402 implements aspects of the Air Toxics “Hot Spots” (or AB 2588) program. Under AB 2588, the SCAQMD evaluates health risk Prioritization Scores for each AB 2588 facility every 4 years using toxic emissions data reported in Annual Emissions Reports (AERs). These calculations rely on simplified assumptions to provide a conservative assessment of risk. A facility with a Prioritization Score greater than 10 is considered “High” risk and is required to provide more detailed information through an Air Toxics Inventory Report (ATIR) and Health Risk Assessment (HRA).

Prioritization Score calculations are expected to increase by 2.5 to 3 times with no change in emissions as a result of the June 2015 changes to SCAQMD risk assessment methods. These increased Prioritization Scores are expected to result in:

- 45 facilities requiring an HRA;
- 20 facilities requiring an HRA and public notification; and
- 22 facilities requiring an HRA, public notification, and a Risk Reduction Plan.

Because of the complexity involved in preparing HRAs, the SCAQMD is proposing to modify Rule 1402 in an effort to reduce the number of new and modified HRAs that will be required.

Voluntary Early Risk Reduction

The District is proposing to add language to Rule 1402 that would provide Voluntary Early Risk Reduction

(VRR) as an alternative path to an HRA. Under VRR, facilities with previously approved HRAs and health risks estimated to be below significant risk levels would be able to opt into the VRR program. The VRR program would require facilities to prepare a VRR Plan that identifies how risk will be reduced below action risk levels within 2 years. These facilities would also be eligible for a “modified” public notification. Facilities with unapproved VRR Plans and those who fail to achieve the risk reductions described in their VRR Plan would revert back to the current HRA process.

Facility Categorizations

It is also being proposed that facilities be categorized under Rule 1402 according to health risk, estimated from AER and prior HRA data (facilities with no prior HRA data would default to Category 1). Category 1 facilities would be required to submit an ATIR and would only be required to prepare an HRA if the ATIR determines a risk above action levels. Category 2 facilities would be required to submit an ATIR and HRA simultaneously, but may be eligible to submit a VRR Plan as an alternative to an HRA if a previous HRA has been approved. Category 3 facilities would follow the typical HRA and risk reduction path.

It is recommended that facilities evaluate their Prioritization Score in advance of SCAQMD notification. Source testing and corrected emission calculations may be used to request a re-prioritization to reduce their Prioritization Score below 10 and avoid additional reporting requirements. The Prioritization Score is a conservative estimate of your

AB 2588 HRA risk and is fairly quick to calculate using AER data.

SCAQMD ADOPTED RULE CHANGES

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

▪ Rule 1113: Architectural Coatings

In February 2016, the SCAQMD finalized several revisions to Rule 1113, which regulates the volatile organic compound (VOC) content of architectural coatings sold and applied in the SCAQMD. As is typical for solvent and coating rule modifications, the allowable VOC content of a number of coating categories was reduced based on the SCAQMD’s assessment of available alternative formulations. A strikeout version of the rule is available at the webpage URL at the top of this article.

In addition, SCAQMD Method 313 was added as an alternative to evaluate the VOC content of Rule 1113 coatings. Method 313 differs from other VOC test methods, as it excludes semi-volatile compounds, i.e., those less volatile than methyl palmitate, from coating VOC totals. The Small Container Exemption (SCE) under Rule 1113 was also reduced to less than 8 fluid ounces for coatings, including Rust Preventative Coatings (RPC). The SCAQMD estimates that, currently, approximately 50% of all RPC sales rely on the SCE.

Similar changes to Rules 1124, 1144, 1168, and 1171 and a new rule to regulate mold release products are anticipated for 2016. Working groups for these rule changes are pending.

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