

Air Quality Update

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August 1, 2018 – BAAQMD

LARGE SPARK-IGNITION ANNUAL REPORTING

The California Air Resources Board (CARB) amended their Large Spark-Ignition (LSI) Regulation in 2016 to require inventory reporting for non-diesel-fueled off-road forklifts and non-forklift equipment consisting of sweepers/scrubbers, industrial tow tractors, and airport ground support equipment that are propane, gasoline, or compressed natural gas-fueled. The fleet size determination must include electric and fuel-cell equipment, Limited Hours of Use (LHU) equipment, and long-term rentals/leases. Small fleets with three or fewer forklifts and/or three or fewer non-forklift equipment units are exempt from the fleet average, reporting, and labeling requirements. All other fleets must meet their respective fleet average emission level standard and report their fleet.

The initial reporting deadline was June 30, 2017, in the LSI section of the Diesel Off-Road Online Reporting System (DOORS). Upon registering the inventory, each unit is automatically assigned an Equipment Identification Number (EIN), which must be labeled on the equipment within 30 days.

Inventory changes, such as return of rentals/leases, new purchases, retrofit installation, etc., must be reported in DOORS within 30 days.

Annual reporting is due June 30, from 2018 until at least 2023. Hour meter readings for LHU equipment must be reported in June for the previous calendar year. The reporting is concluded by requesting and using an electronic

PIN to electronically sign the Attestation form, which certifies that “all reported information is true, accurate, and complete.”

CALIFORNIA PROPOSITION 65 UPDATE

California Code of Regulations Title 27, §25600, et seq.

Stringent changes to California’s Proposition 65 (Prop 65) regulation will become effective August 30, 2018. These updates may require extensive changes to Prop 65 compliance programs for many California businesses and non-California businesses that sell products to California consumers through retail, catalog, or online sales. Consumer, environmental, and occupational Prop 65 warnings meeting current requirements will no longer be compliant. New general warning requirements are specified in the amended regulation, and mandatory “safe harbor” warning content and language is specified for 16 defined product, chemical, and area exposures, including diesel engines, industrial petroleum products, and designated smoking areas.

Off-site environmental exposure warning requirements have also changed. In addition to the above requirements, published or distributed warnings must also contain a map that clearly identifies the area “affected” by the exposure, and warnings published in the local newspaper must be a quarter page in size.

Please visit the following webpage for more details on the Prop 65 changes: <https://www.p65warnings.ca.gov/new-proposition-65-warnings>

Air Quality Tip

The August 30th deadline for the new Prop 65 “clear and reasonable” warning notices is fast approaching. These warnings require specific language and identification of product, chemical, and area exposure warnings. See the article here for detailed information.

Upcoming Training Offered by Yorke Engineering

- Bay Area Air Quality Regulations, Permitting, and Compliance Seminar: October 16 – October 17, 2018
- California Multi-Media Environmental Regulations: Permitting, Compliance, and Reporting Seminar: November 7 – November 8, 2018
<http://yorkeengr.com/classes>

Upcoming Due Dates for 2018/2019*

- CARB GHG Verification..... 8/10/18
- CARB GHG Cap-and-Trade Annual Compliance Surrender..... 11/1/18
- CARB Off-Road Diesel Performance Requirements for All Fleet Sizes 1/1/19
- CARB On-Road HDDVs: 1999 EMY with GVWR 14,001-26,000 lbs Must Be Replaced, Low-Use, or Retired..... 1/1/19
- CARB On-Road TRUCRS Reporting for Flexibility Options..... 1/31/19
- CARB Off-Road DOORS Reporting for All Fleet Sizes 3/1/19
- CARB PERP Equipment Units Annual Report..... 3/1/19
- CARB Refrigerant Reporting for Medium/Large Systems (≥ 200 lbs)..... 3/1/19
- Semi-Annual Title V Report..... Semi-Annually
- Annual Title V Compliance Certification..... Annually
- 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.*

BAAQMD RULE CHANGES

The Bay Area Air Quality Management District (BAAQMD) has new rules and rule amendments designed to limit particulate matter (PM) emissions. The Bay Area is out of compliance with the State PM standards. The new rules and amendments were adopted on August 1, 2018, and are effective July 1, 2019.

■ Regulation 6, Rule 1: *Particulate Matter, General Requirements*

Rule 1 has new limits on PM emission rates and concentration, which are more consistent with other air districts. This includes total suspended particulates (TSPs) and PM less than 2.5 and 10 microns in diameter (PM_{2.5} and PM₁₀). This rule imposes the following conditions:

- Reduces visible fugitive dust plume beyond the property line;
- Requires cleanup or stabilization for bulk materials > 5 inches high or that covers > 25 square feet; and
- Imposes fugitive dust plume limits of 5 feet long, 5 feet wide, or 5 feet tall.

Emission reductions from this rule are expected to be 0.37 tons per day of PM₁₀ and 0.03 tons per day of PM_{2.5}. The BAAQMD also included testing requirements as part of this rule.

The District believes that since large sources of PM already have more restrictive permit limits, the impact of the revised rule will be restricted to a few facilities and concentrated on bulk material storage and handling facilities, specifically coke and coal handling.

■ Regulation 6, Rule 6: *Particulate Matter, Prohibition of Trackout*

The BAAQMD has a new rule focused on road dust. It limits trackout from construction or similar sites > 1 acre. Trackout includes material adhering to vehicles and mobile construction equipment that subsequently falls onto paved roadways or pavement. The rule requires cleanup within 4 hours of any trackout

> 25 linear feet that creates visible emissions. The rule also requires trackout cleanup at the end of a workday and limits the visible plumes generated during cleanup of trackout. Compliance must be monitored at least twice a day and operators need to document visible plumes, any exceedances, and actions taken. The rule may require some construction sites to implement more rigorous practices and recordkeeping.

More information can be found at: <http://www.baaqmd.gov/rules-and-compliance/rule-development/rules-under-development/regulation-6>

AB 617 EXPEDITED BARCT

The BAAQMD has begun planning the implementation of Assembly Bill (AB) 617. One component of this regulation is Best Available Retrofit Control Technology (BARCT), which will require some existing sources to add control equipment. These new requirements will apply to Cap-and-Trade facilities and may apply to others. BAAQMD rules potentially affected include 8-5, 8-8, 8-18, 9-8, 9-12, and 9-13. Table 1 below provides a summary of draft sources with potential BARCT requirements and implementation schedule.

Table 1: AB 617 Draft BARCT Requirements and Schedule

Source	New BARCT Requirement	Compliance Date
Organic Liquid Storage Tanks	Enclosures and Control Devices	Q3 2019
Petroleum Wastewater Treatment	Enclosures and Control Devices	Q4 2019
Portland Cement Manufacturing	Emission Limits, Dry Scrubbing and Lime Injection	Q4 2019
Fiberglass Manufacturing	Baghouses, Wet Scrubbers, and Low-NO _x Burners	Q1 2020
Refinery Fluid Catalytic Crackers and CO Boilers	Emission Limits, Catalyst Additives or Wet Gas Scrubbers	Q2 2020
Refinery Heavy Liquid Leaks	Advanced Leak Detection	Q2 2020
Internal Combustion (Reciprocating) Engines	Oxidation Catalysts	Q2 2020

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

CARB REFRIGERANTS: NEW HFC REGULATIONS

Hydrofluorocarbons (HFCs), which are commonly used in refrigeration and air conditioning systems, are among the most potent and widely used atmospheric pollutants in the world. In recent years, the rapid growth in HFC usage has prompted legislative responses at both the State and federal level.

In September 2016, the State of California adopted Senate Bill (SB) 1383, which calls for the reduction of HFC emissions by 40% below 2013 levels. In support of this goal, on March 23, 2018, CARB adopted new regulations aimed at facilitating the transition to the use of HFC alternatives that have shown lower global warming potential. The new regulations identify prohibited HFCs and prohibit their use in the manufacturing of specific refrigeration equipment and commercial foams. Additionally, manufacturers are responsible for certifying their use of compliant refrigerants and foam agents by way of a notification disclosure statement. Ultimate satisfaction of SB 1383 will lead to the reduction of 3.4 million metric tons of carbon dioxide equivalent emissions annually.