

Air Quality Update

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SCAQMD PLANNING TO END RECLAIM

The South Coast Air Quality Management District (SCAQMD) is poised to end its decades-old Regional Clean Air Incentives Market (RECLAIM) emissions trading program. The District has planned monthly RECLAIM Working Group meetings for the next 4 to 5 years to determine the details of ending the program.

The SCAQMD initiated sunseting RECLAIM in control measure CMB-05 of the 2016 Air Quality Management Plan (AQMP), adopted in March 2017. The goals of CMB-05 are to reduce nitrogen oxide (NO_x) emissions by 5 tons per day, no later than 2031, and transition RECLAIM facilities to command-and-control requirements.

CMB-05 offered the following reasons for sunseting RECLAIM:

“As many of the program’s original advantages appear to be diminishing, an orderly sunset of the RECLAIM program may be the best way to maximize emissions reductions, create more regulatory certainty, and potentially reduce compliance burdens for RECLAIM facilities.”

A command-and-control structure will require that all equipment install Best Available Retrofit Control Technology (BARCT) for NO_x emissions. BARCT emissions standards are incorporated into the SCAQMD Regulation 11 rules.

Status of RECLAIM Working Group

RECLAIM regulates 268 facilities and more than 2,500 pieces of equipment. Ending the program will be a multi-

year process, which is only in its first stages. A 60-Day Report presented to the Governing Board on May 5, 2017, listed several “early” action items to be completed within the next 18 months, which include:

- Ending the entry of new facilities into the RECLAIM program;
- Setting up an “early-exit” program for some facilities; and
- Deciding a schedule for rulemaking, technology assessments, and transition out of the program.

The end-year for RECLAIM has not yet been decided. The SCAQMD has suggested ending the program by 2025 to coincide with the 5 tons-per-day NO_x reduction. Industry groups have proposed ending in 2031, while environmental groups are interested in ending the program much sooner.

A major concern for the end of the program is the fate of RECLAIM Trading Credits (RTCs) held by RECLAIM facilities. One option being considered is transitioning RTCs to Emissions Reduction Credits (ERCs) or using a mass emissions cap to limit emissions.

At the July workshop, the SCAQMD identified facilities with few sources and listed 90 facilities that are candidates for mandatory exit. Of these, 23 have little/no emissions or equipment that meets BARCT, and 67 have equipment that will need to meet BARCT. The equipment categories with command-and-control “landing” rules that already require BARCT were identified, but those that may need modification were discussed.

More information is available at: <http://www.aqmd.gov/home/regulations/rules/proposed-rules#RegXX>

Air Quality Tip

The data and information prepared under the Air Toxics “Hot Spots” reporting and risk assessment program becomes public information and may be used to determine Proposition 65 warning requirements. Other agencies, like the California Division of Occupational Safety and Health (Cal/OSHA), may also use this information to determine if workers or others have been adequately notified of the air toxics reported.

Upcoming Training Offered by Yorke Engineering

- South Coast Air Quality Regulations, Permitting, and Compliance Seminar: October 10 – October 11, 2017
- California Multi-Media Environmental Regulations: Permitting, Compliance, and Reporting Seminar: November 1 – November 2, 2017
<http://yorkeengr.com/classes>

Upcoming Due Dates for 2017/2018*

- RECLAIM APEP (Cycle 2)..... 8/29/17
- Title V – 500-SAM..... 8/31/17
- CARB GHG Verification..... 9/1/17
- SCAQMD 1110.2 Quarterly 10/15/17
- RECLAIM Quarterly (Cycle 1 and 2)..... 10/30/17
- CARB GHG Cap-and-Trade Annual Compliance Surrender 11/1/17
- CARB Off-Road Diesel Performance Requirements for Med./Lrg. Fleets.. 1/1/18
- CARB On-Road HDDVs: Many PM Filter Credits Expire..... 1/1/18
- CARB On-Road HDDVs: 1998 EMY w/ GVWR 14,001-26,000 lbs Must Be Replaced, Low-Use, or Retired..... 1/1/18
- CARB On-Road TRUCRS Reporting for Flexibility Options..... 1/31/18
- Title V – 500-ACC 3/1/18 (Except RECLAIM Cycle 2..... 8/29/17)
- 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 ADOPTED RULE CHANGES

For full details on changes below, go to:

<http://www.aqmd.gov/home/regulations/rules/recent-actions>

▪ Rule 219: *Equipment Not Requiring a Written Permit Pursuant to Regulation II* and Rule 222: *Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II*

On May 5, 2017, the SCAQMD amended Rules 219 and 222. Rule 219 exempts categories of equipment from the need to obtain a written permit. Rule 222 lists categories of equipment that are subject to a streamlined filing/registration program.

The recent Rule 219 amendments exempt new categories of equipment and remove past Rule 219 exemptions. New categories of equipment were also added to the Rule 222 program. Facilities have until May 5, 2018, to submit permit applications and until November 5, 2018, for Rule 222 registrations for equipment with new requirements.

Equipment and operations that are no longer exempt from permitting under Rule 219 include:

- All non-handheld plasma arc and laser metal cutting equipment;
- Shredding and grinding equipment for gardening, agricultural, or landscaping green waste;
- Volatile organic compound (VOC) storage tanks with a combined storage greater than 251 gallons on a mobile platform;
- Tanks containing chromium, nickel, lead, or cadmium;
- Electrolytic plating of lead;
- Separation or segregation of plastics that involves cutting, shredding, grinding, or odors; and
- Equipment used for cleaning of diesel particulate filters.

Additional equipment that now requires submittal of equipment registration under the Rule 222 program includes:

- Tanks for aqueous urea storage;
- Industrial water cooling towers (not used for comfort cooling); and
- Natural gas production equipment, including natural gas pipeline transfer pumps and natural gas repressurizing equipment.

Reiterating existing RECLAIM requirements, additional language was added to ensure that facilities with California Resources Board (CARB) Portable Equipment Registration Program (PERP) equipment follow the applicable monitoring, reporting, and record-keeping requirements of RECLAIM.

A full summary of the amended regulations can be found at:

<http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-may5-027.pdf?sfvrsn=8>

▪ Rule 1430: *Control of Emissions from Metal Grinding Operations at Metal Forging Facilities*

On March 3, 2017, the SCAQMD adopted Rule 1430. Rule 1430 is intended to reduce emissions of air toxics, particulate matter (PM), and odors from metal grinding and metal cutting operations at metal forging facilities.

Under Rule 1430, metal grinding and cutting operations at forging facilities must be done in a “total enclosure.” Operations in an existing building have until September 3, 2017, to convert to total enclosures; new buildings must be converted by March 3, 2018. In the interim, operations must be done in a temporary enclosure. Emissions must also be vented to a control device that

meets the minimum control efficiency, outlet concentration, and ventilation rates under Rule 1430.

Monitoring and source testing is required. For example, source testing of control devices and monitoring of pressure drop across high-efficiency particulate air (HEPA) filters is required. In addition, signage and housekeeping requirements must be implemented. Please refer to the rule for due dates.

SCAQMD PROPOSED RULE CHANGES

For full details on changes below, go to:

<http://www.aqmd.gov/home/regulations/rules/proposed-rules>

▪ Rule 1469: *Hexavalent Chromium Emissions from Chromium Electroplating and Chromic Acid Anodizing Operations*

The SCAQMD is proposing to change Rule 1469, which establishes emission limits, fume suppressant standards, and other requirements for chrome plating operations. Currently, the focus of the proposed rulemaking includes:

- Increased monitoring of control equipment slot velocity, periodic maintenance of controls, and source testing;
- Incorporating non-Rule 1469 tanks (rinse, strip, etc.) into the rule; and
- Evaluating capabilities of non-perfluorooctane sulfonic acid (PFOS) fume suppressants under heating and/or sparging conditions.

Interested parties may sign up to be included in the Rule 1469 Working Group e-mail list by contacting Eugene Kang (EKang@AQMD.gov) or Neil Fujiwara (NFujiwara@AQMD.gov).

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