

Air Quality Update

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August 1, 2018 – SCAQMD

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

- South Coast Air Quality Regulations, Permitting, and Compliance Seminar: October 2 – October 3, 2018
- California Multi-Media Environmental Regulations: Permitting, Compliance, and Reporting Seminar: September 25 – September 26, 2018
<http://yorkeengr.com/classes>

Upcoming Due Dates for 2018/2019*

- RECLAIM APEP (Cycle 2)..... 8/29/18
- Title V – 500-SAM..... 8/31/18
- SCAQMD 1110.2 Quarterly 10/15/18
- RECLAIM Quarterly (Cycle 1 and 2) 10/30/18
- 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 w/ GVWR 14,001-26,000 lbs Must Be Replaced, Low-Use, or Retired .. 1/1/19
- SCAQMD 1110.2 Quarterly 1/15/19
- RECLAIM Quarterly (Cycle 2) 1/30/19
- 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 Med./Lrg. Systems (≥ 200 lbs) 3/1/19
- Title V – 500-ACC 3/1/19 (Except RECLAIM Cycle 2..... 8/29/18)
- 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.*

NO_x RECLAIM SUNSET UPDATE

The South Coast Air Quality Management District (SCAQMD) is proposing numerous rule amendments to transition facilities from the Regional Clean Air Incentives Market (RECLAIM) emissions trading program to command-and-control permits. All equipment emitting oxides of nitrogen (NO_x) will have to meet Best Available Retrofit Control Technology (BARCT) standards for NO_x. BARCT emissions standards are incorporated into the SCAQMD Regulation XI rules (a.k.a., “landing rules”). If equipment does not meet BARCT or is otherwise exempt by the landing rule, it may have to be retrofitted or replaced according to a schedule in Rule 1100.

Rule 1146 for boilers and heaters is the first landing rule scheduled to be amended. The rule amendment schedule has slipped from June to December 2018. Several more rules are in line for revision as well. The delay allows the SCAQMD more time to resolve several issues, including how to handle New Source Review (NSR) requirements for RECLAIM Trading Credits (RTCs) and Emission Reduction Credits (ERCs). The SCAQMD is meeting frequently with the Environmental Protection Agency (EPA) on such issues.

As of July 2018, the SCAQMD proposes to take the amended rules listed in the table below to the Hearing Board by the dates shown.

Table 1: RECLAIM Sunset Schedule

Rule	Affected Equipment	Hearing Board Date
PR 1118.1	Non-Refinery Flares	November 2018
PAR 1134	Gas Turbines	Q1 2019
PAR 1135	Electric Power Generating Systems	October 2018
PAR 1146	Boilers/Heaters	December 2018

SCAQMD PROPOSED RULE CHANGES

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

▪ Rule 1118.1: Control of Emissions from Non-Refinery Flares

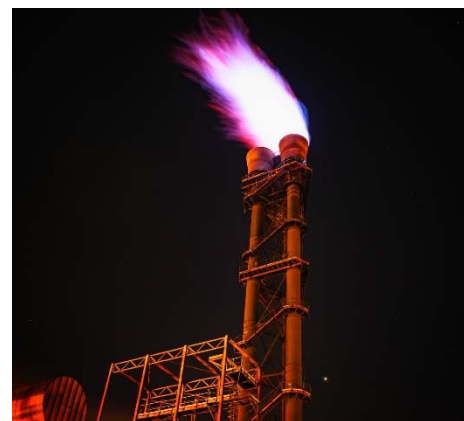
The SCAQMD has proposed a new rule that will impact flares at non-refinery operations. Flares that have been operating at non-refinery facilities for more than 20 years, as well as new flares, will be forced to apply retrofit technologies or implement operational methodologies to reduce overall flaring.

As part of the SCAQMD’s efforts to construct preliminary rule language, various industry sectors, including landfills, wastewater plants, and oil and gas, were visited to better understand gas usage. Preliminary findings outlined opportunities for improvements for affected operators, but also acknowledged feasibility challenges related to gas processing.

Recently, draft rule language was constructed and published on the SCAQMD’s website. Current rule language outlines various operating scenarios based on the type of flare operating at the facility. For new flares and flares more than 20 years old, stringent emission thresholds must be met. These are outlined in Table 1 of the proposed rule. Otherwise, flares in operation less than 20 years will not be required to meet the Table 1 emission thresholds.

The SCAQMD realizes that obtaining a new flare or retrofitting an existing

one may not be feasible. As such, the rule outlines an option for categorizing a certain amount of gas to be captured and utilized as “Beneficial Use,” or gas that is not flared. The total percent of captured gas categorized as Beneficial Use increases every 2 years, however. To continue to qualify, the District will require operators to only flare 2% of the overall facility gas by 2028. An approved plan would be required to be submitted to the District should a facility decide to implement this option.



If a Beneficial Use plan is not achievable, a facility may take the route of claiming “low use” of the flare, but would need to demonstrate to the District that NO_x emissions are less than 1 pound per day, or 30 pounds per calendar month, or does not operate more than 200 hours per given year.

Lastly, there are additional requirements for maintenance, fuel, and hourly monitoring, as well as source testing contingent upon how the facility’s flare is categorized.

A list of potentially affected facilities can also be found on the District’s proposed rule website, provided above.

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.