

Air Quality Update

Brought to you by YORKE ENGINEERING, LLC.

www.YorkeEngr.com

January 23, 2018 – SCAQMD

AB 617 – NONVEHICULAR AIR POLLUTION: CRITERIA AIR POLLUTANTS AND TOXIC AIR CONTAMINANTS

California Assembly Bill (AB) 617 was signed into law on July 26, 2017. The goals of AB 617 are to collect better data on the exposure of communities to air pollutants (criteria and toxic pollutants), abate exposure particularly to disadvantaged communities, and strengthen compliance and enforcement. The law will result in more regulations for some facilities, potentially including:

- A statewide system of annual reporting for toxic and criteria pollutants;
- Fenceline monitoring; and
- Additional emissions reductions.

Statewide Reporting System

The State will develop a statewide uniform system for the reporting of criteria and toxic emissions from “stationary sources,” defined as those that report their greenhouse gas (GHG) emissions to the California Air Resources Board (CARB), emit more than 250 tons per year of any nonattainment pollutant, or are identified as potentially having an elevated health risk impact.

Community Monitoring

By October 1, 2018, the State will develop a plan for disadvantaged communities that identifies high-priority areas based on their exposure to pollutants and location of sensitive receptors. Districts will then deploy monitoring systems in these high-priority areas by July 1, 2019. The air districts will have the authority to require “stationary

sources” to install fenceline monitoring to supplement the community monitoring systems.

BARCT

Air districts will adopt an accelerated schedule for implementing Best Available Retrofit Control Technology (BARCT) for nonattainment pollutants by January 1, 2019. Full implementation of BARCT must occur by January 1, 2023. Air districts will assess and identify BARCT for nonattainment pollutants and develop rules for implementation. Districts will have the flexibility to allow emissions trading or other equivalent emissions reductions. In addition, the State will establish a database of BARCT determinations for air districts to use.

State Strategy and Community Emissions Reduction Program

The State will develop a statewide strategy that identifies high-exposure communities and measures for reducing emissions. Air districts will then develop an emissions reduction program for communities identified by the State. The District program must identify emissions reduction targets, reduction measures, a schedule for implementation, and an enforcement plan.

Updates

The Districts must develop an emissions reduction program within 1 year of the State identifying the high-exposure communities. Beginning January 1, 2020, CARB will identify additional priority communities on a yearly basis. The Districts will then need to deploy new community monitoring and reduction programs within 1 year for those communities. Following that, they will

also prepare annual reports summarizing results and actions.

Air Quality Tip

The State and local air districts are very focused on air toxics emissions in local communities. Pay careful attention to ensure that air toxics reporting is accurate and emissions are not over-reported for your facility.

Upcoming Training Offered by Yorke Engineering

- South Coast Air Quality Regulations, Permitting, and Compliance Seminar: March 27 – March 28, 2018
<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 2018*

- RECLAIM Quarterly (Cycle 2) 1/30
- CARB On-Road TRUCRS Reporting for Flexibility Options..... 1/31
- Title V – 500-SAM 2/28
- Title V – 500-ACC 3/1 (Except RECLAIM Cycle 2..... 8/29)
- RECLAIM APEP (Cycle 1)..... 3/1
- CARB Off-Road DOORS Reporting for All Fleet Sizes 3/1
- CARB PERP Equipment Units Annual Report..... 3/1
- CARB Refrigerant Reporting for Medium/Large Systems (≥ 200 lbs.)..... 3/1
- SCAQMD AER 3/16
- USEPA GHG Report 3/31
- CARB GHG > 25K Metric Tons 4/10
- SCAQMD Rule 1110.2 Quarterly..... 4/15
- CARB GHG 10-25K Metric Tons and All Electric Retailers 6/1
- CARB GHG SF₆ Switchgear 6/1
- CARB LSI DOORS Reporting for Medium and Large Fleets 6/30
- 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.*

DIESEL OFF-ROAD REPORTING REQUIREMENTS FOR SMALL FLEETS BEGINS IN 2018

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 table below.

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.

Small fleets, defined as having a total fleet size of 2,500 horsepower (HP) or less, must report their January 1, 2018, fleet status by March 1, 2018, and continue annually until at least 2028. Performance requirements for small fleets begin in 2019 and annually thereafter through at least 2028.

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

Fleets that do not meet their fleet average target on the final performance due date must continue to report annually and must acquire Best Available Control Technology (BACT) credits of at

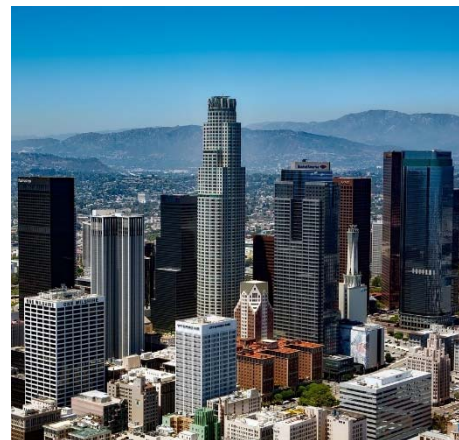
least 10% of the fleet HP annually until they meet their final fleet average target. For more information, go to: <https://www.arb.ca.gov/msprog/ordiesel/ordiesel.htm>

SCAQMD ADOPTED RULE CHANGES

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

▪ Rule 1147: NO_x Reductions from Miscellaneous Sources

In July 2017, the South Coast Air Quality Management District (SCAQMD) amended Rule 1147, which regulates nitrogen oxides (NO_x) from gaseous and liquid fuel-fired combustion equipment. These amendments are intended to provide relief to facilities.



The amendments clarify the exemptions for food ovens and flare-type systems, as well as remove the emission limit requirement for units with a heat input rating less than 325,000 British thermal units per hour (Btu/hr) (maintenance and recordkeeping requirements remain in effect). The

amendments increase the NO_x emission limit to 60 parts per million (ppm) for low-temperature afterburners, burn-off ovens, incinerators, and related equipment.

Ultra-low NO_x infrared burners now have a testing exemption. An exemption was also added for units that become subject to the rule upon Rule 219 amendment. Compliance flexibility was added for low-emission units with emissions less than 1 pound/day, including a compliance schedule extension to a 30-year lifetime.

▪ Rule 1466: Control of Particulate Emissions from Soils with Toxic Air Contaminants

On July 7, 2017, Rule 1466 was adopted and came into effect 30 days later. The rule aims to minimize fugitive dust emissions containing arsenic, asbestos, cadmium, hexavalent chromium, lead, mercury, nickel, and polychlorinated biphenyls during earthmoving activities of more than 50 cubic yards from sites designated by federal/State environmental agencies identified in the rule as having applicable toxic air contaminant(s). Notification is required prior to earthmoving activities and whenever ambient particulate matter less than 10 micrometers in diameter (PM₁₀) dust concentration limits are exceeded. Signage, upwind and downwind PM₁₀ monitoring, and recordkeeping are required. Alternative dust control measures, concentration limits, signage, and other alternative provisions are allowed under Executive Officer approval.

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