

Air Quality Update

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CARB REPORTING FOR FACILITIES WITH MEDIUM-SIZED REFRIGERATION SYSTEMS BEGINS

On March 1, 2014, the Annual Reports will be due for facilities with large and medium-sized refrigeration systems, refrigerant distributors, and reclaimers subject to the California Air Resources Board's (CARB's) Refrigerant Management Program (RMP). This includes reporting for refrigeration systems with greater than 200 pounds of refrigerant. CARB's refrigerant program does *not* apply to HVAC systems, which are typically used for comfort cooling.

Facilities with large and medium-sized refrigeration systems are also required to pay their annual implementation fee by March 1, 2014. The CARB online Refrigerant Registration and Reporting tool, known as R3, can be accessed via the following URL: <https://ssl.arb.ca.gov/rmp-r3/index>

This year, facilities with medium-sized (200-2,000 pounds) refrigeration systems must register and report for the first time.

As part of the California Global Warming Solutions Act of 2006 (AB 32), CARB adopted a regulation in 2009 to reduce greenhouse gas (GHG) emissions from stationary sources through refrigerant leak detection and monitoring, leak repair, system retirement and retrofitting, reporting and recordkeeping, and proper refrigerant cylinder use, sale, and disposal. High-global warming potential (GWP) refrigerants, such as chlorofluorocarbons (CFCs), hydro-

chlorofluorocarbons (HCFCs), hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs), are used in a large variety of refrigeration and air conditioning systems.

The South Coast Air Quality Management District (SCAQMD) issued Rule 1415 in 1991 and Rule 1415.1 in 2010, which require registration and leak control requirements for air conditioning and refrigeration equipment using the subject refrigerants. Under Rule 1415.1, once a facility registers a refrigerant system at CARB, they no longer have to register it with the SCAQMD.

CARB's program is designed to: 1) reduce emissions of high-GWP GHG refrigerants from leaky stationary, non-residential refrigeration equipment, 2) reduce emissions from the installation and servicing of refrigeration and air conditioning appliances using high-GWP refrigerants, and 3) verify GHG emission reductions. The regulation requirements include registration, refrigerant leak detection and monitoring, leak repair, reporting and recordkeeping, system retrofit or retirement planning, required service practices, and refrigerant distributor, wholesaler, and reclaimer prohibitions, recordkeeping, and reporting.

Refrigerant distributors, wholesalers, and reclaimers are also required to submit an Annual Report of their 2013 aggregated annual refrigerant sales, transactions, and disposal by the March 1, 2014, due date.

For more details on the requirements of the regulation, please visit the program web page at the following URL: <http://www.arb.ca.gov/stoprefrigerantleaks>

Air Quality Tip

When performing organic leak testing on fugitive components that is required to demonstrate compliance with rules or permit conditions, make sure your testing contractor is calibrating the portable volatile organic compound (VOC) analyzer to the level required. For example, if the requirement is to test for leaks less than 10,000 ppm, your contractor should be calibrating the instrument with 10,000 ppm calibration gas; if your testing contractor uses a 25,000 ppm calibration standard, the local air district could issue a Notice of Violation.

Upcoming Training Offered by Yorke Engineering:

- South Coast Air Quality Regulations, Permitting, & Compliance Seminar: March 18 – March 19, 2014
<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 2014

- SCAQMD AER 3/4
- RECLAIM APEP (Cycle 1)..... 3/1
- USEPA GHG Report 3/31
- CARB GHG >25K Metric Tons 4/10
- CARB GHG 10-25K Metric Tons & All Electric Retailers 6/2
- CARB GHG SF6 Switchgear..... 6/2
- CARB PERP Equipment Units Annual Report..... 3/1
- CARB On-Road Heavy-Duty DV* Report for Low-Use, Phase-In, & Good Faith Efforts 1/31
- CARB In-Use Off-Road DV* Report for Large Fleets 3/1
- RECLAIM Quarterly (Cycle 2) 1/30
- Title V – 500-SAM..... 2/28
- Title V – 500-ACC 3/1 (Except RECLAIM Cycle 2..... 8/29)
- Title V – Application for Permit Renewal – Due 180 Days Prior to Permit Expiration

*Diesel Vehicle

SCAQMD ADOPTED RULE CHANGES

For full details on rule adoption changes below, go to:
<http://www.aqmd.gov/rules/recentrules.html>

▪ 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*

SCAQMD Rule 219 was initially adopted on January 9, 1976, to exempt certain, specific equipment sources or operations from the requirements of a written Permit to Operate. Rule 222 was later adopted on September 11, 1998, to provide an alternative to owners/operators of specific emission sources not requiring a written permit. Owners/operators can register qualifying emission sources under Rule 222 by submitting a description of and an estimate of emissions from each source and by providing information used to determine whether or not the equipment's operations are in compliance with all applicable District, state, and federal rules and regulatory requirements.

Rules 219 and 222 were revised in 2013. Primary amendments adopted for both rules include:

- Expansion of each of the rules' applicability;
- Addition to the existing rules' definitions;
- Identification and addition of several new equipment sources to the existing rules' equipment list of devices not requiring a Permit to Operate; and
- Providing additional clarification and updates to each of the existing rules.

New Rule 219 applicable equipment sources now include:

Rule 219 Equipment
Aerosol Can Recycling Systems
Carpet and Paper Shearing Machines
Cosmetic Filling Stations and Related Filling Equipment
Laser Cutting, Etching, and Engraving Equipment
Non-Commercial Charbroilers at Multi-Family Residential Units

SCAQMD Rule 222 has added a number of new equipment categories that now require registration with the SCAQMD. New equipment sources listed in Rule 222 include (there are other existing categories):

Rule 222 Equipment	Size
Asphalt Day Tankers	≥ 159 gallons, < 5,000 gallons
Asphalt Pavement Heaters (Used for Road Maintenance and New Road Construction)	--
Diesel-Fueled Boilers (Above 4,000 Feet or Offshore 15 Miles and in Operation Prior to May 3, 2013)	≤ 2,000,000 Btu/hour
Food Ovens (and Yeast VOC Emissions < 1 lb/day)	≤ 2,000,000 Btu/hour
Certain Fuel Cells and Associated Heating Equipment	≤ 90,000 therms/year used

Rule 222 Equipment	Size
Portable Diesel-Fueled Heaters	≤ 250,000 Btu/hour
Power Pressure Washers and Hot Steam Washers and Cleaners	≤ 550,000 Btu/hour
Tar Pots or Kettles	≥ 159 gallons, < 1,000 gallons
Internal Combustion Engines Used Exclusively for the Electrical Generation at Remote Two-Way Radio Transmission Towers	≤ 100 bhp
Micro-Turbines (Cumulative < 2 MW)	≤ 3,500,000 Btu/hour
Storage of Odorants for Natural Gas, Propane, or Oil	< 251 gallons

Rule 222 Recordkeeping Requirements

Annual records are now required by Rule 222 for registered equipment. Records must be kept by the facility and made available to the District upon request. These records provide operational data that includes but is not limited to:

- Hours of operation;
- Materials used or processed;
- Fuel usage;
- Throughput; and
- Operating parameters.

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