

Air Quality Update

Brought to you by YORKE ENGINEERING, LLC.

www.YorkeEngr.com

February 6, 2013 – SJVAPCD

CARB REPORTING FOR FACILITIES WITH 10,000 TO 25,000 METRIC TONS BEGINS

All facilities that have not previously been required to report their greenhouse gas (GHG) emissions and emitted between 10,000 and 25,000 metric tons (MT) of carbon dioxide equivalent emissions (CO₂e) in 2012 are required to prepare abbreviated 2012 emission reports by June 1, 2013. The California Air Resources Board (CARB) estimates an additional 150-200 facilities will be required to submit abbreviated reports.

For facilities required to submit abbreviated reports for the first time, registration is required to set up the California electronic greenhouse gas reporting tool (Cal e-GGRT). Registration is suggested to be completed by April. This process requires a signed and dated certification statement by the designated representative of the facility. More information on Cal e-GGRT can be found here: <http://www.arb.ca.gov/cc/reporting/ghg-rep/tool/ghg-tool.htm>

For most new facilities required to submit abbreviated emission reports, the facility's emissions will be determined based on the total annual fuel usage at the facility. Therefore, in many cases, the gas bills will be the main source used to calculate GHG emissions. More detailed guidance can be found on the CARB website: <http://www.arb.ca.gov/cc/reporting/ghg-rep/guidance/guidance.htm>

CARB GHG CAP-AND-TRADE UPDATE

CARB approved the Cap-and-Trade

program on December 16, 2010, under Assembly Bill 32, the Global Warming Solutions Act (AB 32). Additional amendments were passed on November 2, 2012, revising the initial Cap-and-Trade program and adding further clarification and updates on facility reporting requirements based on emission thresholds.

Starting in 2013, all GHG emitting facilities with non-biogenic GHG emissions equal to or greater than 25,000 MT will be required to cover their emissions with allowances or offset emissions credits. The first compliance obligation deadline for the 2013 emissions is November 1, 2014.

Also, the CARB February 2013 auction is scheduled to take place on February 19th from 10 a.m. to 1 p.m. The application deadline for the auction is January 22nd. There will be both 2013 and 2016 vintage allowances available at auction.

Reporting deadlines are June 1, 2013, for electric entities that do not generate and April 10, 2013, for all other facilities and suppliers subject to Cap-and-Trade.

EPA GHG UPDATE

The Environmental Protection Agency (EPA) recently passed new regulations that will require additional data elements for the 2010 and 2011 GHG emission reports to be added to the 2012 GHG emission reports due March 31st. Examples include non-default heating values, or measured carbon content of fuels used to calculate combustion GHG emissions from various sources. For more information, visit: <http://www.epa.gov/ghgreporting/reporters/index.html>

Air Quality Tip

San Joaquin Valley Air Pollution Control District (SJVAPCD) Rule 2050 mandates that Authorities to Construct (ATCs) expire 2 years from the date of issuance. If your new source has been constructed, following notification to the SJVAPCD (as specified in Rule 2010), the ATC serves as a Temporary Permit to Operate until the Permit to Operate is granted. If installation/construction is going to take longer than 2 years, be sure to apply for and gain approval for a one-time 2-year extension for your ATC.

Upcoming Training Offered by Yorke Engineering:

- San Joaquin Valley Air Quality Regulations, Permitting and Compliance Seminar: April 16 – April 17, 2013
<http://www.yorkeengr.com/AirQualityClasses.htm>

Upcoming Due Dates

- USEPA GHG Report3/31
- CARB GHG >25K Tons.....4/10
- CARB GHG 10-25K Tons and >25K Tons Electric.....6/1
- CARB PERP Annual Reports.....3/1
- CARB Portable Engine ATCM Report.....3/1
- CARB On-Road Heavy-Duty DV* Phase-In Report1/31
- CARB In-Use Off-Road DV* EIN Label Requirement1/1
- CARB In-Use Off-Road DV* Report3/1
- 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

*Diesel Vehicle

PORTABLE ENGINE ATCM FLEET STANDARD AND REPORTING REQUIREMENTS

Starting January 1, 2013, owners of one or more portable diesel internal combustion engines are subject to fleet average diesel particulate matter (PM) emission standards. These fleet emission requirements are part of the portable diesel engine Airborne Toxic Control Measure (ATCM) that applies not only to Portable Equipment Registration Program (PERP) registered engines, but also to portable diesel-fueled engines that are operating under a local air district permit. As listed in Table 1 below, the fleet emission standards for each fleet vary depending on engine size range.

Table 1: 2013 Fleet Average Emission Standards

Fleet Engine Size Range	Weighted PM Fleet Average
Engines < 175 hp	0.3 g/bhp-hr
175 hp < Engines < 750 hp	0.15 g/bhp-hr
Engines > 750 hp	0.25 g/bhp-hr

Compliance with the weighted fleet average PM emissions rate is demonstrated using the fleet average calculation formula that is specified in the ATCM. The ATCM fleet calculator is also available on the CARB website (see link below). For the fleet standards that became effective on January 1, 2013, the Responsible Official of the fleet is required to submit a signed statement of compliance by March 1, 2013, to verify that the fleet standards have been achieved and provide a summary of each portable engine in the fleet, including the make, model, serial number, and year of each portable engine and the associated diesel PM emission rate in g/hp-hr.

In determining compliance with the fleet average standards, portable diesel-fueled engines that are operated

exclusively outside of California or only within the Outer Continental Shelf (OCS), that operate exclusively for emergency use, or that qualify as low-fuel engines by operating 80 hours or less in a calendar year are excluded from the fleet requirements. The ATCM also provides incentives for meeting the fleet emission requirements through various credits from using grid power, alternative-fueled portable engines, or Tier 4 engines.

CARB ATCM Fleet Calculator:
<http://www.arb.ca.gov/portable/portable2.htm>

SAN JOAQUIN VALLEY APCD PROPOSED RULES CHANGES

For full details on proposed rule changes below, go to:
http://www.valleyair.org/Workshops/public_workshops_idx.htm

- Rule 1020 – *Definitions*: The proposed amendments will update the list of compounds exempt from ozone regulations due to their low ozone forming potential. The compounds to be added to the list of exempt compounds are dimethyl carbonate (DMC) and propylene carbonate (PC). These proposed amendments are based on EPA findings that DMC and PC have a low potential to form ozone in the atmosphere. DMC may be used to replace other solvents for some cleaning and coating applications, and PC is commonly used in adhesives, paint strippers, and as a solvent for aerial pesticide application. In addition, the proposed amendments will remove the permitting requirements for methyl formate (MF) and tertiary-butyl acetate (TBAC), which were already listed

as exempt compounds.

SAN JOAQUIN VALLEY APCD 2012 PM_{2.5} PLAN COMMITMENT

On December 20, 2012, the SJVAPCD adopted the 2012 PM_{2.5} Plan. The purpose of the plan is to outline a strategy for demonstrating attainment with the newest federal standard for fine particulate matter (PM_{2.5}). As part of the plan, the SJVAPCD reviewed the current rules and regulations to assess the potential for additional PM_{2.5} emission reductions. In 2013, the SJVAPCD plans to amend Rule 4308 – Boilers, Steam Generators, and Process Heaters – 0.075 MMBtu/hr to Less Than 2.0 MMBtu/hr by lowering the oxides of nitrogen (NO_x) emission limits for instantaneous water heaters in the size range from 0.075 to 0.4 MMBtu/hr.

Additionally, Rule 4692 – Commercial Charbroiling is under consideration for future amendment to require emission controls on under-fired charbroilers, further reducing daily PM_{2.5}. Based on the 2012 PM_{2.5} Plan, the SJVAPCD made a commitment to review the operation of under-fired charbroilers and under-fired charbroiler controls and amend Rule 4692 in 2016.

The SJVAPCD also plans to revise Rule 4905 – Natural Gas-Fired, Fan-Type Residential Central Furnaces in 2014 and possibly include natural gas-fired, fan-type commercial central furnaces in the rule. These amendments will involve lower NO_x emission limits for residential furnaces, as well as the possibility of incorporating NO_x limits for commercial central furnaces.

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