

Air Quality Update

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January 23, 2018 – SJVAPCD

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

- San Joaquin Valley Air Quality Regulations, Permitting, and Compliance Seminar:
March 20 – March 21, 2018
<http://www.yorkeengr.com/AirQualityClasses.htm>

Upcoming Due Dates for 2018*

- CARB On-Road TRUCRS Reporting for Flexibility Options..... 1/31
- CARB Off-Road DOORS Reporting for All Fleet Sizes 3/1
- CARB PERP Equipment Units Annual Report..... 3/1
- CARB Refrigerant Reporting for Medium and Large Systems (≥ 200 lbs.)..... 3/1
- USEPA GHG Report 3/31
- CARB GHG > 25K Metric Tons 4/10
- 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
- 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

**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>

NEW GREENHOUSE GAS RULES FOR CRUDE OIL AND NATURAL GAS FACILITIES

Proposed Rules 2260 and 3156

On March 23, 2017, CARB adopted a new State regulation, “Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities” (also known as California’s Oil and Gas Regulation – COGR). To implement California’s “Global Warming Solutions Act of 2006” (also known as AB 32), CARB relies on a multifaceted approach, including various source-specific rules. COGR is one of those rules.

COGR can be implemented and enforced by CARB directly or by local air districts. The San Joaquin Valley Air Pollution Control District (SJVAPCD) has chosen to implement COGR through proposed Rule 2260 (Registration Requirements) and Rule 3156 (Fees for Rule 2260). On December 21, 2017, a public hearing was held to consider adoption of the rules.

Rule 2260 applies new methane requirements for:

- Crude oil or natural gas production;
- Crude oil, condensate, and produced water separation and storage;
- Natural gas underground storage;

- Natural gas gathering and boosting stations;
- Natural gas processing plants; and
- Natural gas transmission compressor stations.

For equipment subject to the new COGR standards, the SJVAPCD plans to implement a web-based registration system independent from District permits that will allow facilities to directly enter information. The District will issue registrations electronically containing all applicable COGR requirements. Annual inspections will be combined with periodic equipment inspections. Records will be required to document the basis of exemption for certain equipment.

The State is expected to cover the District’s implementation costs for this new program. Rule 3156 is a separate fee rule for the program to be used if State funding is not adequate.

COGR requires that applications be filed with CARB by January 1, 2018, whereas Districts have no adopted programs. Registration applications submitted electronically to CARB by January 1, 2018, will satisfy the SJVAPCD application requirement. CARB will send this information to the SJVAPCD if the program has been adopted.

The announcement for the December 21, 2017, public hearing, which includes the final draft rules, can be found at:

http://www.valleyair.org/Workshops/postings/2017/R2260_And_3156/2260_and_3156_Notice_of_Public_Hearing.pdf

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.