

Air Quality Update

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AB 617 IMPLEMENTATION

The “Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants,” or CTR Regulation, was adopted by the California Air Resources Board (CARB) on December 14, 2018. The CARB staff is expected to continue to modify elements of the regulation before it becomes finalized and effective. There are four facility categories that trigger applicability to report criteria air pollutants and toxic air contaminants to local air districts and CARB, which include:

- 1) Facilities subject to the CARB greenhouse gas (GHG) Mandatory Reporting Regulation (MRR);
- 2) Facilities permitted to emit 250 tons per year or more of non-attainment criteria pollutants or their precursors;
- 3) Facilities that received an elevated Air Toxic Hot Spot prioritization score from their local air district; and
- 4) All facilities with one or more permitted sources that are within a selected community.

CARB has released an initial list of facilities potentially subject to the emissions reporting requirements of the regulation, available for download here: <https://ww2.arb.ca.gov/our-work/programs/criteria-pollutant-and-toxics-emissions-reporting/potential-facilities-subject>

Most facilities that fall under Categories 1-3 will start reporting emissions annually, beginning with reporting 2018 emissions in 2019. Facilities that fall under Category 4 will start reporting 2019 emissions in 2020. Emissions reporting data will be due to the local air

district prior to May 1st of each year. Emissions reports will be submitted by the air districts to CARB by August 1st of each year. For more information, see: <https://ww2.arb.ca.gov/our-work/programs/criteria-pollutant-and-toxics-emissions-reporting/criteria-pollutant-and-toxics>

CARB has also posted the list of the first-year communities. New selected communities will be added each year. In the San Joaquin Valley, these communities include Shafter and South Central Fresno, and Steering Committee meetings have begun. For meeting information, visit: <http://community.valleyair.org>

PERP AND ATCM RULE AMENDMENTS FOR PORTABLE EQUIPMENT

On November 30, 2018, the recent rule amendments to the CARB Portable Equipment Registration Program (PERP) and Portable Airborne Toxic Control Measure (ATCM) took effect. This ATCM implements a new Tier phase-out schedule and makes the 2013, 2017, and 2020 fleet average standards obsolete. Large fleets with more than 750 horsepower (hp) under common ownership may instead opt-in to a new weighted fleet average compliance path for January 1st of 2020, 2023, and 2027, as long as all engines, including Emergency and Low-Use, are registered under PERP.

Credits are available for small and large fleets that have early Tier 1 or Tier 2 retirements and/or meet specific fleet average standards laid out in the ATCM. Credits can extend compliance requirements.

Low-Use (increased to 200 hours/year) and Emergency-Use engines are exempt from the Tier phase-out or fleet

average calculations and require proper recordkeeping and reporting. Applying for Low-Use or Change of Ownership is required at least 6 months prior to the phase-out deadline.

Air Quality Tip

With the focus now on sources of air toxic emissions throughout California, it is important for every facility to know what their sources of toxic emissions are and how their emissions are calculated. Accuracy matters!

Upcoming Training Offered by Yorke Engineering

- San Joaquin Valley Air Quality Regulations, Permitting, and Compliance Seminar:
April 2 – April 3, 2019
<http://www.yorkeengr.com/AirQualityClasses.htm>

Upcoming Due Dates for 2019*

- 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 PERP Engine Low-Use Annual Report.....3/1
- CARB Refrigerant Reporting for Medium/Large Systems (≥ 200 lbs.)..... 3/1
- CARB GHG Reporting for Semiconductor Operations..... 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.*

SJVAPCD ADOPTED RULE CHANGES

For full details on changes below, go to: http://www.valleyair.org/rules/rules_recently_adopted.htm

■ Rule 2260: *Registration Requirements for Equipment Subject to California's Oil and Gas Regulation*

San Joaquin Valley Air Pollution Control District (SJVAPCD) Rule 2260, Registration Requirements for Equipment Subject to California's Oil and Gas Regulation, serves as a registration mechanism for specified oil and gas production and management equipment located within the SJVAPCD. Registration applications for existing equipment were due to the District by March 1, 2018, and covered facilities are required to submit the CARB Data Inventory information to the District by March 1st of each year.

The rule implements a portion of Assembly Bill (AB) 32, the California Global Warming Solutions Act, and the regulations found in California Code of Regulations Title 17 §95665, et seq.

Rule 2260 applies to any facility covered by California's Oil and Gas Regulation that has the potential to emit natural gas. This includes industry sectors such as onshore and offshore oil or natural gas production, crude oil and produced water separation and storage, and natural gas production, processing, transmission, and storage operations. Covered equipment includes separator and tank systems, circulation tanks for well stimulation treatments, reciprocating and centrifugal natural gas compressors, natural gas-powered pneumatic devices and pumps, liquids unloading of natural gas wells, and natural gas underground storage facilities.

The Oil and Gas Regulation in Title 17 contains operational and record-keeping requirements designed to prevent natural gas leakage, as well as

inspection, testing, and recordkeeping requirements.

■ Rule 2280: *Portable Equipment Registration*

SJVAPCD Rule 2280 provides a mechanism to register portable emissions units and provides operating standards for eligible operations. Units that are exempt from obtaining a Permit to Operate are not required to be registered under Rule 2280. Portable emissions units are those that may be moved from facility to facility in the normal course of business and do not stay in any one location for more than 6 consecutive months.

The District proposed modifications to Rule 2280 to allow portable agricultural burning devices to be registered and operated under the provisions of the rule. Allowing air curtain burn boxes to register under Rule 2280 will provide an alternative management method for pruning and removal of orchard debris, decreasing open burning and reducing particulate matter (PM). Emissions from air curtain burn boxes will be limited to no more than 100 pounds per day of oxides of nitrogen (NO_x) and volatile organic compounds (VOCs) and 150 pounds per day of PM per project. The units will also have an annual limit of 10,000 pounds per unit.

Rule 2280 specifies several types of equipment eligible for registration. These include confined abrasive blasting units; Portland concrete batch plants; spark-ignition internal combustion engines that power well drilling, power generation, pumps, compressors, pile drivers, wood chippers, and

welders; unconfined abrasive blasting operations; and sand and gravel screening operations. New portable equipment operations must be registered prior to use in the District.

Registration applications must include emission calculations and engineering information necessary to demonstrate compliance with the operating standards contained in the rule. The SJVAPCD must conduct an on-site inspection of the unit prior to issuing the registration.

Operating standards will be required for specified equipment such as abrasive blasting, concrete batch plants, and sand and gravel equipment. These will include, for example, fabric or cartridge filter dust collectors that can demonstrate a minimum 99% control efficiency. Internal combustion engines must be powered by low-sulfur fuel and must not exceed specified NO_x emission levels.

If an emissions unit remains in an air district for 24 hours or more, the operator shall notify the District. Rule 2280 requires operators to report to the SJVAPCD, within 30 days after the end of each calendar quarter, the location(s) in which the equipment was operated during the quarter, the duration and throughput of all operations, and the type and quantity of fuels consumed by the units, if applicable.

The requirements of Rule 2280 also apply to rented equipment. The operator of the rented equipment must furnish to its owner the necessary information for completion of the required quarterly reports.

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