

# Air Quality Update

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**January 29, 2020 – SCAQMD**

## **NEW SUBSTANCES PROPOSED TO BE ADDED TO AB 2588**

The California Air Resources Board (CARB) is in the process of amending the Assembly Bill (AB) 2588 Air Toxics “Hot Spots” Emission Inventory Criteria and Guidelines (EICG) and is soliciting support from the Scientific Review Panel (SRP) in reviewing proposed updates to the chemical substances list in Appendix A of the regulation. The proposed Appendix A-I to A-III list of toxic air contaminants (TACs) includes over 800 new substances. The SRP’s review of this list will provide instructive feedback to CARB as they move forward with revisions to the EICG. Appendix A was last updated in 2007.

The Air Toxics “Hot Spots” Information and Assessment Act of 1987 (AB 2588) was enacted in September 1987. Under this regulation, stationary sources are required to report the types and quantities of toxic substances their facilities routinely release into the air. Emissions of interest include those that result from the routine operation of a facility or that are predictable, including but not limited to continuous and intermittent releases and process upsets or leaks.

The goals of AB 2588 are to collect emissions data, to identify facilities having localized impacts, to ascertain health risks, and to notify nearby residents of significant risks. In September 1992, the “Hot Spots” Act was amended by Senate Bill (SB) 1731 to address the reduction of significant risks. The bill requires that owners of significant risk facilities reduce their risks below the level of significance.

The current Appendix A list of TACs is broken up into three categories (I, II,

and III) and a subcategory (carcinogen). Category I is required to be quantified, Category II is required to be reported if produced, used, or present, and Category III need not be reported unless manufactured. Aside from the new substances, the proposed Appendix A has the same three categories with the same requirements. The new list, however, would have eight subcategories:

- Carcinogens;
- Developmental and reproductive toxicants;
- Pesticides;
- Metals;
- Other inorganics;
- Pharmaceuticals;
- Neurotoxins; and
- “Other,” which includes chemicals with diverse health effects.

The proposed EICG will provide direction and criteria to facilities on how to compile and submit air toxics emissions data as required under CARB’s “Hot Spots” program. Under the current and the new EICG, air districts determine the methodology that industries are required to use to report TACs. Generally, TACs must be reported to the air district or updated every 4 years, at which time the air district “prioritizes” an emitter; if the priority is high, then the emitter must quantify the air toxics emissions and may be required to perform a health risk assessment (HRA). Once CARB approves the new Appendix A list, a facility that knows it manufactures or emits any of these substances must report it in its air toxics report to the air district.

For more information on the proposed amendments, visit CARB’s website at: <https://ww3.arb.ca.gov/ab2588/2588guid.htm>

## **Air Quality Tip**

*As of January 1, 2020, if you receive a CARB Non-Compliant Vehicle Warning on your Department of Motor Vehicles (DMV) Vehicle Registration Notice, your vehicle has been identified as non-compliant with CARB’s Truck & Bus Regulation, and the DMV will no longer register that vehicle. Be sure to check your vehicle’s applicability and compliance requirements to stay on the road!*

### **Upcoming Training Offered by Yorke Engineering**

- South Coast Air Quality Regulations, Permitting, and Compliance Seminar: March 24 – March 25, 2020  
<http://yorkeengr.com/classes>
- UCI Division of Continuing Education, Air Quality Permitting and Compliance – Spring Quarter: <http://unex.uci.edu/courses> (see Environmental Management)

### **Upcoming Due Dates for 2020\***

- RECLAIM Quarterly (Cycle 2) ..... 1/30
- CARB On-Road TRUCRS Reporting for Flexibility Options ..... 1/31
- Title V – 500-SAM ..... 2/28
- RECLAIM APEP (Cycle 1) ..... 2/29
- Title V – 500-ACC ..... 3/1 (Except RECLAIM Cycle 2 ..... 8/29)
- CARB Off-Road DOORS Reporting for All Fleets ..... 3/1
- CARB PERP Reporting: Units, Low-Use, and Large Fleet Average ..... 3/1
- CARB Refrigerant Reporting for Medium/Large Systems (≥ 200 lbs) ..... 3/1
- CARB GHG Semiconductor Report ..... 3/1
- SCAQMD AER ..... 3/17
- U.S. EPA GHG Report ..... 3/31
- CARB GHG > 25K Metric Tons ..... 4/10
- SCAQMD 1110.2 Quarterly ..... 4/15
- CARB GHG 10-25K Metric Tons and All Electric Retailers ..... 6/1
- CARB GHG SF<sub>6</sub> 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

*\*Due dates listed are statutory dates; sometimes dates are extended when on a weekend/holiday.*

## SCAQMD ADOPTED RULE CHANGES

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

### ▪ **Rule 1110.2: Emissions from Gaseous- and Liquid-Fueled Engines and Rule 1100: Implementation Schedule for NO<sub>x</sub> Facilities**

On November 1, 2019, the South Coast Air Quality Management District (SCAQMD) Governing Board voted to amend Rule 1110.2 and Rule 1100. Rule 1110.2 contains oxides of nitrogen (NO<sub>x</sub>) limits for internal combustion engines greater than 50 horsepower (except engines used for self-propulsion), and Rule 1100 establishes the compliance schedule for Regional Clean Air Incentives Market (RECLAIM) facilities that will become subject to Amended Rule 1110.2.

Pursuant to Amended Rule 1100, engines at RECLAIM and former RECLAIM facilities must comply with Rule 1110.2 emission limits by December 31, 2023. Permit applications are due by July 1, 2021, for each stationary engine that does not meet the Rule 1110.2 emission limits. Amended Rule 1110.2 primarily updates the NO<sub>x</sub> emission standards to be applicable to RECLAIM facilities; the existing emission limits for most engines will remain the same. The amended rule provides additional averaging options to demonstrate compliance with the emission limits and includes updates to monitoring, recordkeeping, and reporting requirements.

Most of the current RECLAIM engines that do not meet the Rule 1110.2 emission limits will require the installation of new selective catalytic reduction (SCR) controls or retrofit of existing SCR equipment to comply with the amended rule. The SCAQMD initially proposed to include an ammonia limit for add-on air pollution control equipment (i.e.,

SCR) in Amended Rule 1110.2; however, this ammonia limit requirement was removed in the final rule. Ammonia limits for new engines are to be based on Best Available Control Technology (BACT) on a case-by-case basis during permitting. Emergency engines that operate less than 200 hours per year continue to be exempt.

### ▪ **Rule 1480: Ambient Monitoring and Sampling of Metal Toxic Air Contaminants**

Proposed Rule 1480 was adopted by the Governing Board on December 6, 2019. This new rule is a monitoring and sampling rule for metal TACs, with the main purpose of transferring the responsibility of conducting ambient air monitoring from the SCAQMD to facilities that meet certain criteria and are subsequently designated as Rule 1480 Metal TAC Monitoring Facilities. Specifically, the monitoring and sampling requirements of Rule 1480 apply to facilities that are Potentially High Risk Level Facilities under Rule 1402, where Significant Risk Levels have been exceeded for any sensitive receptors. Thus, this rule is intended to complement Rule 1402 for High Risk Level Facilities by requiring monitoring and sampling while the facility conducts an HRA and implements a Risk Reduction Plan.

Under Rule 1480, any facility that receives an Initial Notice from the SCAQMD may be required to provide data when the District is conducting monitoring and sampling in communities surrounding a facility, in order for the SCAQMD to determine if the facility can be designated as a Metal TAC Monitoring Facility. For instance, if

the District detects elevated levels of toxics in a community from existing monitoring programs (such as from AB 617 Community Air Monitoring or public complaints), the surrounding facilities in that community may be investigated, and information requests may be sent by the SCAQMD to facilities to submit data. The SCAQMD may then designate a facility as a Metal TAC Monitoring Facility that will be required to prepare and submit a Monitoring and Sampling Plan. The facility must then conduct, or pay the District to conduct, the ambient air monitoring and sampling.

The costs of implementing the monitoring required by Rule 1480 can be significant. Small facilities with annual revenues less than \$3 million and less than 25 employees are exempt from the monitoring and sampling requirements.

## SCAQMD PROPOSED RULE CHANGES

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

### ▪ **Rules 1147, 1147.1, and 1147.2: NO<sub>x</sub> Reductions from Miscellaneous Sources and Metal Processing Equipment**

The SCAQMD continues to conduct the Best Available Retrofit Control Technology (BARCT) analysis for proposed amendments to Rules 1147, 1147.1, and 1147.2. At this time, the SCAQMD is proposing to include microturbines that are rated less than 0.3 megawatt in Rule 1147.1. The Public Workshops for the proposed rule changes are expected to be held in February 2020, and the Public Hearings are expected to be held in August 2020.

*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 1,050 customers, including a wide variety of industrial facilities and government organizations throughout California.*