

Air Quality Update

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September 3, 2019 – SCAQMD

AB 617 REPORTING UPDATE

The “Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants,” or CTR Regulation, was revised by the California Air Resources Board (CARB) on May 13, 2019, and revised again on July 17th. Each of the proposed revisions was open for a comment period, which ended on June 7th and August 1st, respectively.

The May 13th changes involved delaying the initial annual reporting until 2020 for reporting 2019 emissions, with full reporting not being required until 2021 for 2020 emissions. Emissions reporting data is still due to the local air district by May 1st, with reports submitted to CARB by August 1st.

CARB also proposed changes to applicability. The first three criteria for those who have to report remain as required in Assembly Bill (AB) 617, including facilities that report greenhouse gas (GHG) emissions, facilities with permitted emissions greater than 250 tons per year of criteria pollutants, and facilities with elevated prioritization scores. The requirements for additional applicability were changed significantly. Facilities with permitted equipment in selected communities were removed and initially replaced with specifications that were based on permitted criteria pollutant emissions or sector-based activity levels. However, due to many comments provided after the first revision, all additional applicability requirements were removed from the second revision completed in July. CARB staff has indicated that they intend to include additional applicability in future rulemaking updates to the regulation.

The 2019 data reporting in 2020 will follow local air district policies and practices. Starting with 2020 data reporting in 2021, CARB data reporting requirements will be phased in, including reporting by device/process level. This device-level reporting will include stack heights and locations, exact facility location, and data on the footprint of the facility. In addition, CARB will be implementing a State-operated online electronic reporting system with air districts.

The proposed changes were updated to require reporting of emissions from permitted, and in some cases unpermitted, sources. Although the first revision included emissions from portable sources, that has been removed from the second revised version of the regulation, but will be considered in future rulemaking.

The reports require an attestation that the report is true, complete, and accurate, are required to be retained for 5 years, and are subject to audit.

The initial version of the regulation was anticipated to impact approximately 14,000 facilities, the first revision was anticipated to impact 50,000 facilities, and the current version of the regulation is anticipated to impact only about 1,300 facilities.

The regulation is tentatively scheduled to go to the Office of Legal Affairs later this summer for implementation, with the regulation scheduled to go into effect by the end of the year.

For more information and a list of subject facilities, visit the CARB website at the following URL:

<https://ww2.arb.ca.gov/our-work/programs/criteria-pollutant-and-toxics-emissions-reporting/potential-facilities-subject>

Air Quality Tip

The December 7th permit application deadline is fast approaching for modifications or replacements required at SCAQMD facilities with boilers, steam generators, and process heaters. Be sure to review and plan for amended Rule 1146 and 1146.1 nitrogen oxide (NO_x) emission limits.

Upcoming Training Offered by Yorke Engineering

- South Coast Air Quality Regulations, Permitting, and Compliance Seminar: September 24 – September 25, 2019
- California Multi-Media Environmental Regulations: Permitting, Compliance, and Reporting Seminar: October 22 – October 23, 2019
<http://yorkengr.com/classes>

Upcoming Due Dates for 2019/2020*

- SCAQMD 1110.2 Quarterly 10/15/19
- RECLAIM Quarterly (Cyc. 1 & 2)..10/30/19
- CARB GHG Cap-and-Trade Annual Compliance Surrender..... 11/1/19
- CARB Off-Road Diesel Compliance for All Fleets, by Fleet Target or BACT..... 1/1/20
- CARB On-Road HDDVs Must Be Repowered, Retired, or Low-Use 1/1/20
 - If > 26,000 GVWR, EMY 1999 or Older
 - If < 26,000 GVWR, EMY 2003 or Older
- Non-Exempt Tier 1 PERP Engines < 750HP May No Longer Be Operated in CA ...1/1/20
- SCAQMD 1110.2 Quarterly 1/15/20
- RECLAIM Quarterly (Cycle 2) 1/30/20
- CARB On-Road TRUCRS Reporting for Flexibility Options... 1/31/20
- CARB Off-Road DOORS Reporting for All Fleets 3/1/20
- CARB PERP Annual Reporting, Units and Low-Use 3/1/20
- CARB Refrigerant Reporting for Med./Lrg. Systems (≥ 200 lbs) 3/1/20
- CARB GHG Semiconductor Report . 3/1/20
- Title V – 500-SAM..... 2/28/20
- Title V – 500-ACC 3/1/20 (Except RECLAIM Cycle 2..... 8/29/19)
- 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.

NO_x RECLAIM EXIT UPDATE

The South Coast Air Quality Management District (SCAQMD) is proposing to amend Rule 2001, which contains Regional Clean Air Incentives Market (RECLAIM) applicability requirements, to once again prohibit facilities from exiting the RECLAIM program. No facility will be allowed to exit RECLAIM until all of the command-and-control “landing rules” and New Source Review (NSR) requirements are adopted to demonstrate equivalency with the transition from the RECLAIM program. Facilities that have received initial notifications to exit the RECLAIM program from the SCAQMD and those that have requested to exit the RECLAIM program will be notified by the District that they will remain in RECLAIM once the amended rule is adopted.

REMINDER: RECLAIM FACILITIES AND RULES 1146, 1146.1, AND 1100

Permit applications are due to the SCAQMD by December 7, 2019, for facilities to modify or replace boilers, steam generators, and process heaters that do not comply with the recently amended Rule 1146 and 1146.1 NO_x emission limits. For RECLAIM facilities, equipment that does not comply with the NO_x emission limits must be retrofitted by January 1, 2021, for at least 75% of the facility’s units (in terms of cumulative total rated heat input capacity for both Rule 1146 and 1146.1 units) and for 100% of units by January 1, 2022.

Facilities can also choose to replace an entire unit by January 1, 2023, with one that meets the NO_x emission limits. A permit application would be required by December 7, 2019, for either the burner retrofit or entire unit replacement option. It is suggested that facilities contact their equipment service company in the next few weeks to evaluate the integrity of the equipment that needs to be retrofitted or

replaced to determine the most cost-effective and feasible retrofit options.

SCAQMD ADOPTED RULE CHANGES

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

▪ Rule 1118.1: Control of Emissions from Non-Refinery Flares

Rule 1118.1 for control of NO_x and volatile organic compound (VOC) emissions from non-refinery flares was adopted on January 4, 2019. The rule applies to flares that require a permit at non-refineries, including flares located at oil and gas production, wastewater treatment, landfill, and organic liquid handling facilities.

Facilities that submit a permit application to install, replace, or relocate flares after January 4, 2019, are required to comply with NO_x, VOC, and carbon monoxide (CO) emission limits shown in Table 1 of the rule. Existing flares are required to meet the annual capacity threshold requirements in Table 2 of the rule. If the existing flare exceeds the annual capacity threshold, a “Notification of Annual Percent Capacity Greater than Threshold” must be submitted to the SCAQMD no later than 30 days from the end of that calendar year. If the existing flare exceeds the annual capacity threshold for a second consecutive year, a “Notification of Intent” must be submitted no later than 60 days from the end of that second calendar year to either reduce throughput or replace or modify the existing flare.

The facility may submit a one-time request to rescind or submit a revision for

a previously submitted “Notification of Intent” to switch between the two options. A one-time extension request may also be submitted to comply with the schedules contained in the flare throughput reduction requirements (Table 3 of the rule) and flare replacement requirements (Table 4 of the rule), if the request is submitted in writing at least 60 days prior to the deadline for the requirement.

Source test requirements and monitoring, recordkeeping, and reporting requirements are also specified in the new rule. Lastly, the new rule has provisions for exemptions, including exemptions for various types of flares located at specified facilities, for units that emit less than 30 pounds of NO_x per month, and for units that operate less than 200 hours per calendar year.

▪ Rule 1134: Emissions of Oxides of Nitrogen from Stationary Gas Turbines

On April 5, 2019, the SCAQMD Governing Board voted to amend Rule 1134, which contains NO_x emission reduction requirements for stationary gas turbines that are not located at electricity generating facilities, landfills, petroleum refineries, or publicly owned treatment works or those fueled by landfill gas. The amended rule will expand its applicability to include stationary gas turbines that were previously not required to comply with the rule and will update NO_x and ammonia emission limits to comply with Best Available Retrofit Control Technology (BARCT). The amendments also include updates to the monitoring, reporting, and recordkeeping requirements, revised exemptions, and establishing new exemptions for emergency and low-use equipment.

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