

Air Quality Update

Brought to you by YORKE ENGINEERING, LLC

www.YorkeEngr.com

September 4, 2019 – SJVAPCD

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

When submitting a permit application, request to review the draft permit prior to issuance. This gives you the opportunity to review the equipment description, terms, and conditions of the permit prior to finalization. If there are errors or issues that may impact compliance, you can then discuss these with the permit engineer to see if they can be addressed. Remember, once the permit is issued, all information listed must be complied with, and changes require an application.

Upcoming Training Offered by Yorke Engineering

- California Multi-Media Environmental Regulations: Permitting, Compliance, and Reporting Seminar:
November 5 – November 6, 2019
<http://yorkeengr.com/classes>

Upcoming Due Dates for 2019/2020*

- 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
- 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
- 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

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

SJVAPCD PROPOSED REGULATORY MEASURES IN 2018 PM_{2.5} ATTAINMENT PLAN

For full details on changes below, go to: <https://www.valleyair.org/pmplans>

The San Joaquin Valley Air Pollution Control District (SJVAPCD) recently adopted the 2018 Plan for the 1997, 2006, and 2012 PM_{2.5} Standards. As part of the District's attainment strategy, several new regulatory measures were proposed. Table 1 summarizes the District rules affected and the proposed timeline. The most relevant proposed changes are summarized below.

▪ Rule 4311: Flares

Under Rule 4311, flare operators at Major Sources (Title V facilities) are required to submit flare minimization plans, perform extensive monitoring and recordkeeping, and submit reports of planned and unplanned flaring events to the District. Proposed changes include additional ultra-low-nitrogen oxide (NO_x) flare emission limits, additional flare minimization requirements, and expanding the rule applicability to flares located at Minor Sources (non-Title V facilities).

▪ Rule 4306: Boilers, Steam Generators, and Process Heaters – Phase 3; Rule 4320: Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater Than 5.0 MMBtu/hr

Rules 4306 and 4320 apply to boilers, steam generators, and process heaters with a heat input greater than 5.0 million British thermal units per hour (MMBtu/hr). This equipment can be found at a wide range of industries. Current emission limits vary depending on the size of the unit and range between 5 and 12 parts per million (ppm) NO_x. Proposed NO_x emission limits could be reduced to as low as 2 to 3.5 ppm, depending on the unit.

Table 1: Regulatory Measures Proposed in the 2018 PM_{2.5} Attainment Plan

Rule	Public Process Begins	Action Date	Implementation Begins
Rule 4311: Flares	2018	2020	2023
Rule 4306: Boilers, Steam Generators, and Process Heaters – Phase 3; Rule 4320: Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater Than 5.0 MMBtu/hr	2019	2020	2023
Rule 4702: Internal Combustion Engines	2019	2020	2024
Rule 4354: Glass Melting Furnaces	2020	2021	2023
Rule 4352: Solid Fuel Fired Boilers, Steam Generators and Process Heaters	2020	2021	2023
Rule 4550: Conservation Management Practices	2021	2022	2024
Rule 4692: Commercial Under-Fired Charbroiling	2019	2020	2024
Rule 4901: Wood Burning Fireplaces and Wood Burning Heaters	2019	2019	2019

▪ Rule 4702: Internal Combustion Engines

Rule 4702 applies to internal combustion engines rated at 25 brake horsepower (bhp) or greater. Proposed changes to the rule would lower existing NO_x limits, depending on the engine, to as low as 5 ppm.

▪ Rule 4354: Glass Melting Furnaces

Proposed changes to Rule 4354 will evaluate the feasibility of ultra-low-NO_x control technologies, potentially lowering the NO_x emission limit from 1.5 to 1.0-1.2 pounds per ton of glass pulled.

▪ Rule 4352: Solid Fuel Fired Boilers, Steam Generators and Process Heaters

Units subject to Rule 4352 fire on a variety of solid fuels: coal, petroleum coke, biomass, tire-derived fuel, and municipal solid waste facilities. The proposed changes will evaluate the feasibility of lower NO_x emission levels, particularly at municipal waste-fired units.

SJVAPCD AB 617 UPDATES

For full details on changes below, go to: <http://community.valleyair.org>

South Central Fresno and the City of Shafter were the first Valley communities selected for AB 617 implementation. The SJVAPCD is involved in several efforts as part of AB 617, including:

- Steering Committee meetings are being held on the second Wednesday of the month (South Central Fresno) and the second Monday of the month (City of Shafter);
- An expedited Best Available Retrofit Control Technology (BARCT) implementation schedule was approved by the Governing Board on December 20, 2018;
- Development of Community Air Monitoring Plans and Community Emission Reduction Plans is ongoing; and
- Map-based community emissions inventories are available.

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.