

# Air Quality Update

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**January 1, 2021 – SCAQMD**

## **AB 617 REPORTING UPDATE**

On November 19<sup>th</sup>, the California Air Resources Board (CARB) adopted significant changes to the “Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants” (“CTR” Regulation) and the Emission Inventory Criteria and Guidelines Report for the Assembly Bill (AB) 2588 Air Toxics “Hot Spots” Program. The changes harmonize these two emissions reporting programs and significantly expand their implementation across the State. In summary, the changes increase applicability of the Annual Criteria and Air Toxic Emissions reporting to over 60,000 facilities in California (CA) and adds consideration of 900 new toxic substances to the inventory program. The reporting for some facilities will include emissions from portable equipment, and for some, abbreviated reporting will be allowed.

CARB is developing a web-based database for statewide annual emissions, which will ultimately make facility emissions data available via a graphical interface. This effort is called for under AB 617 and AB 197. The local air districts are currently working with CARB, collecting and submitting data as required under the regulation.

Applicability for reporting and the new toxic substances will phase in over several years, as follows:

- All facilities currently reporting greenhouse gas (GHG) emissions to CARB will begin full reporting through the local air districts (except for release point data) in 2021 with 2020 emissions data;
- All facilities with elevated prioritization scores under the Air Toxics

“Hot Spots” program, as determined by their local air district, will have 2020 emissions data prepared and submitted by their local air district in 2021; and

- Newly subject facilities will phase in over several years, beginning in 2023 with 2022 data, depending upon which district they are in and which emissions or activities exceed the thresholds.

CARB staff has indicated they intend to make further refinements to the regulations using the 15-day notification process.

Each criteria pollutant and toxic air contaminant (TAC) will be reported by device and/or process. Release point data will include stack heights and locations, temperature, velocity, etc. In addition, data on the footprint of the facility will also be required. For TACs that do not have an emission factor or method of quantification, the amount produced or used will be reported.

For more information on the changes, visit the CARB website at:

<https://ww2.arb.ca.gov/our-work/programs/criteria-and-toxics-reporting/ctr-regulation>

## **ACT REGULATION: “LARGE ENTITY SURVEY” REQUIRED REPORTING DUE APRIL 1, 2021**

The Advanced Clean Truck (ACT) Regulation aims to accelerate the Zero Emission (ZE) vehicles market and requires a one-time “Survey” reporting about CA operations (owned and rented/leased of 1 year or longer) of vehicles of any fuel type with a gross vehicle weight rating (GVWR) greater than 8,500 pounds (Classes 2B and larger) for “Large Entities” that meet any of the following: (1) CA business with over \$50 million in national gross

annual revenue in 2019; (2) CA fleet with 50 or more vehicles; (3) brokers that dispatched 50 or more vehicles in 2019; or (4) any CA or federal government agency in CA with one or more vehicles.

For each CA facility, the vehicles are to be grouped by fuel type, body type, and weight class, indicate the quantity for each group, and answer survey questions to characterize each group. Questions on “Daily Operations” include average daily mileage and if they operate on a predictable usage pattern, return daily to the home base, park for more than 8 hours/day, operate within 50 miles of the facility, tow a trailer more than 100 miles/day, and commonly operate at the weight limit. Questions on “Vehicle Information” include average annual mileage for typical vehicle in each group, how long they are typically kept before replacement, if they are fueled on-site, are backup vehicles, and if any were dispatched from 2017-2020 to support government-issued emergency events.

Data reported must be from 2019 and/or 2020 annual or quarterly records averaged to daily values or provide reasoning if using an alternative/shorter period. Survey data from one vehicle group at one facility can be repeated for the same vehicle group at another facility if operations are similar enough.

### ***Air Quality Tip***

*We have seen increased activity by air districts and the community surrounding odor complaints. Odor is typically covered under the nuisance clauses, so it is often difficult to prove regulatory compliance. If you have odors emanating from your facility, best to try and reduce them proactively since resolution once complaints start can be difficult.*

## UPDATE ON RULE 1146 AND RULE 1146.1 CO MONITORING REQUIREMENTS FOR RECLAIM FACILITIES

The South Coast Air Quality Management District (SCAQMD) published a compliance advisory on September 11, 2020, that clarifies the Rule 1146 and 1146.1 requirements for Regional Clean Air Incentives Market (RECLAIM) facilities to comply with the portable analyzer diagnostic emission check (DEC) testing requirements for carbon monoxide (CO). This supersedes a previous compliance advisory from August 26, 2014, which specified that either source tests or DEC were required for CO for boilers at RECLAIM facilities.

Now, RECLAIM facilities with large source boilers subject to Rule 1146 will have to perform CO DEC's monthly (or every 750 unit operating hours, whichever occurs later) until three consecutive checks pass, then quarterly (or every 2,000 unit operating hours, whichever occurs later) is acceptable until a check exceeds the applicable limit (then revert to monthly checks until three consecutive checks pass again).

Similarly, RECLAIM facilities with process unit boilers subject to Rule 1146.1 will have to perform CO DEC's quarterly (or every 2,000 unit operating hours, whichever occurs later) until four consecutive checks pass, then semi-annual checks (or every 4,000 unit operating hours, whichever occurs later) are acceptable until a check exceeds the applicable limit (then revert to quarterly checks until four consecutive checks pass again).

A DEC can be satisfied by one of the following existing requirements conducted during the same time period: (1) a source test following the Rule 1146 and 1146.1 testing protocol; or (2) a RECLAIM tune-up conducted pursuant to Rule 2012.

## SCAQMD PROPOSED RULE CHANGES

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

### ■ Proposed Amended Rule 461 and Proposed Rule 461.1: Gasoline Transfer and Dispensing

The SCAQMD has proposed amendments to Rule 461 for gasoline dispensing operations and is proposing to introduce new Rule 461.1 to address gaps with mobile fueling operations. Proposed Rule 461.1 would establish requirements for retail and non-retail mobile fueling operations and include requirements for loading and dispensing of gasoline, inspection requirements, and recordkeeping and reporting requirements.

The first Working Group Meeting was held in September 2020. The SCAQMD has distributed a survey to gather information on mobile fueling operations. Responses to the survey will be used by the District to more accurately account for the various types of operations and properly assess potential impacts. The SCAQMD will continue to have meetings to receive stakeholder input. A second Working Group Meeting was held in December 2020, and the Public Hearing is proposed for September 2021.

### ■ Proposed Amended Rule 1146: Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters

The SCAQMD is proposing to amend Rule 1146 to remove the ammonia concentration limit of 5 parts per million (ppm) for new and modified pollution

### Upcoming Due Dates for 2021\*

- CARB Off-Road Diesel Compliance for All Fleets, by Fleet Target or BACT..... 1/1
- CARB On-Road HDDVs Must Be Repowered, Retired, or Low-Use..... 1/1
  - If > 26,000 GVWR, EMY 2004 or Older
  - If < 26,000 GVWR, EMY 2006 or Older
- SCAQMD 1110.2 Quarterly ..... 1/15
- 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)..... 3/1
- 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.

controls associated with boilers that have ammonia emissions in the exhaust. The purpose of the amendment is to prevent conflicts with Regulation XIII for New Source Review. The District is proposing to address ammonia emission limits for new and modified pollution controls, such as selective catalytic reduction (SCR), during the permitting process rather than in Rule 1146 to allow the SCAQMD to evaluate the ammonia limit on a case-by-case basis.

*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 1,200 customers, including a wide variety of industrial facilities and government organizations throughout California.*