

Air Quality Update

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February 1, 2022 – SCAQMD CTR REGULATION UPDATE

On August 12, 2021, the California Air Resources Board (CARB) adopted additional changes to the “Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants” (“CTR” Regulation), which were approved by the Office of Administrative Law on October 28, 2021, and went into effect on January 1, 2022. These changes modified some of the requirements for additional applicability for facilities that will be required to start reporting as early as 2023 for 2022 emissions. Some of the additional changes include:

- Raising the criteria air pollutant [except carbon monoxide (CO)] threshold for many air districts from 4 to 10 tons per year;
- Providing more time for an extension to submit more information for a non-applicability determination;
- Extending the deadline to start reporting new toxic substances to 2027; and
- Creating a new, later deadline for reporting for wastewater treatment, scrap recycling, composting, and other organic waste handling facilities to occur starting in 2029.

Applicability for new facilities’ initial reporting will begin as early as 2023 for facilities within the six at-risk air districts defined by the regulation and 2025 for other air districts. Annual reporting will be required to begin in either 2027 or 2029 based on the air district location of the facility.

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

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

GAS-INSULATED SWITCHGEAR REGULATION UPDATE

On August 13, 2021, CARB adopted revisions to the “Regulation for Reducing Greenhouse Gas Emissions from Gas-Insulated Equipment,” which is currently under consideration with the Office of Administrative Law. The first major revision was to incorporate requirements for electrical equipment containing any greenhouse gas (GHG) and any gas-insulated equipment. Major changes include:

- Creating a timeline to phase-out purchase of all insulating equipment containing sulfur hexafluoride (SF₆) by 2033;
- Providing incentives to remove SF₆ equipment before 2025;
- Establishing alternative limits based on total emissions instead of just a percentage leakage rate to improve ability for small capacity owners to meet compliance;
- Revising the calculation methodology based on total GHG emissions instead of just SF₆ emissions and to improve report accuracy;
- Providing a few exemptions to the phase-out deadline;
- Adding a process to correct nameplate capacity of current equipment; and
- Requiring an additional 5% reduction in the annual limit starting in 2035.

Applicability for these changes begins this year for 2021 emissions once the revisions are finalized. Additional information can be found here:

<https://ww2.arb.ca.gov/our-work/programs/elec-tandd>

Air Quality Tip

As the COVID-19 pandemic winds down, be prepared for increased air district inspection activity. Employee absences at work can lead to gaps in recordkeeping, so make sure you have your records up to date in the event of an unannounced inspection.

Upcoming Online EH&S Training Offered by Yorke Engineering

- Southern California Air Quality Regulations, Permitting, and Compliance Seminar: May 3, 6, 10, 12, 2022 (Half-Days)
- California Waste and Water Environmental Regulations: Permitting, Compliance, and Reporting Seminar: April 12, 14, 19, 21, 2022 (Half-Days)
Class Info at: <http://yorkeengr.com/classes>

Upcoming Due Dates for 2022*

- 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: Usage for Equipment Units or Hours Low-Use Engines... 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 LCFS Q4 Fuel Report 3/31
- CARB GHG > 25K Metric Tons 4/10
- SCAQMD 1110.2 Quarterly 4/15
- RECLAIM Quarterly (Cycles 1 & 2) 4/30
- CARB LCFS Annual Fuel Report 4/30
- CARB GHG 10-25K Metric Tons and All Electric Retailers 6/1
- CARB Gas-Insulated Equipment GHG Report 6/1
- CARB LSI DOORS Reporting for Medium and Large Fleets 6/30
- CARB LCFS Q1 Fuel Report 6/30
- SCAQMD Rule 2305 Operators in Warehouses ≥ 250K Sq. Ft. Initial Report 7/1
- 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 1147.1: *NO_x Reductions from Aggregate Dryers*

Rule 1147.1 is a new rule adopted by the South Coast Air Quality Management District (SCAQMD) on August 6, 2021, that applies to natural gas-fired aggregate dryers that have nitrogen oxide (NO_x) emissions greater than or equal to 1 pound per day with a rated heat input greater than 2,000,000 British thermal units (Btu) per hour. The rule is effectively updating and replacing the NO_x emission limit for aggregate dryers that was previously listed in Rule 1147 for miscellaneous sources. However, units that do not meet the applicability of the new rule will continue to be subject to Rule 1147. The new rule also establishes an implementation schedule and has requirements for monitoring and recordkeeping. Aggregate dryers subject to Rule 1147.1 must meet emission limits of 30 parts per million (ppm) NO_x and 1,000 ppm CO corrected to 3% oxygen.

Units that comply with the previous Rule 1147 limit of 40 ppm NO_x need to submit permit applications to meet proposed emission limits by July 1st of the year after the unit burner becomes 32 years old. Units not in compliance with the previous Rule 1147 NO_x limit must submit applications to meet proposed emission limits by July 1, 2022, or July 1st of the year after the unit burner becomes 12 years old, whichever is later.

- **Rule 1407.1: *Control of Toxic Air Contaminant Emissions from Chromium Alloy Melting Operations;***
- **Rule 1426: *Emissions from Metal Finishing Operations;***
- **Rule 1469: *Hexavalent Chromium Emissions from Chromium Electro-***

plating and Chromic Acid Anodizing Operations; and

▪ **Rule 1469.1: *Spraying Operations Using Coatings Containing Chromium***

In 2021, the SCAQMD adopted and amended new rules to control toxic air contaminant emissions from metal finishing operations and several chromium-containing processes. Rule 1407.1 (adopted January 8, 2021) has emission control requirements for chromium alloy melting furnaces that go into effect starting July 1, 2024. The rule also contains prohibitions and several housekeeping, building, source testing, material testing, parameter monitoring, and recordkeeping requirements.

Rule 1426 (amended April 2, 2021) contains new building, housekeeping, and best management practice requirements to reduce fugitive emissions of hexavalent chromium, nickel, cadmium, and lead at metal finishing facilities starting on January 1, 2023; however, there are also interim requirements that are effective as of the rule adoption date. Facilities subject to Rule 1426 are also required to maintain a tank inventory report that must be submitted by February 1, 2022. Rule 1469 (amended April 2, 2021) was modified to incorporate the amended Rule 1426 requirements to include building enclosure requirements for hexavalent chromium tanks, with implementation schedules beginning January 1, 2023.

Rule 1469.1 (amended June 4, 2021) was revised significantly with many changes to update the requirements to be consistent with the other toxic rules, including adding requirements for housekeeping, building enclosures,

best management practices, and parameter monitoring beginning January 1, 2022. Amended Rule 1469.1 also has provisions to minimize the release of fugitive emissions for related operations, such as dried chromate coating removal and demasking activities.

SCAQMD PROPOSED RULE CHANGES

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

▪ **Rules 1147 and 1147.2: *NO_x Reductions from Miscellaneous Sources and Metal Melting and Heating Furnaces***

The SCAQMD continues to conduct Working Group meetings for proposed amended Rule 1147 for miscellaneous sources and proposed Rule 1147.2 for metal melting and heating furnaces. The SCAQMD is proposing to include autoclaves, absorption chillers, micro-turbines, diesel tar pots, and tunnel dryers in proposed amended Rule 1147. The proposed updated implementation schedule is for low-emitting or near-limit units to submit permit applications to meet the proposed NO_x and CO limits when the burner reaches 32 years, and all other units to submit permit applications to meet the proposed NO_x and CO limits when the burner reaches 12 years.

Rule 1147.2 is proposed to have both alternative NO_x limits and new proposed NO_x limits that will apply to metal melting, heat treating, and forging furnaces. Permit applications are expected to be required to be submitted by July 1, 2023, to establish permit conditions for units that perform at or below alternative NO_x limits.

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 1,400 customers, including a wide variety of industrial facilities and government organizations throughout California.