

# Air Quality Update

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## September 15, 2022 – SJVAPCD

### CTR REGULATION UPDATE

On January 1, 2022, recent changes to the California Air Resources Board (CARB) “Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants” (“CTR” Regulation) went into effect, requiring some facilities to begin reporting as early as 2023 for 2022 emissions. Applicability of the rule will phase in over three different sector classifications and two air district classifications. Permitted facilities meeting the following criteria are subject to reporting:

- Emit 4 tons per year (tpy) of any criteria pollutant [100 tpy of carbon monoxide (CO)] in a Group A air district (see list below);

<b>District Group A:</b>	➤ SMAQMD	
➤ SCAQMD	➤ SDAPCD	
➤ SJVAPCD		<b>District Group B:</b>
➤ BAAQMD	➤ All Other Air	
➤ ICAPCD	Districts	

- Emit 10 tpy of any criteria pollutant (100 tpy of CO) in a Group B air district (all other smaller districts);
- Exceed the activity level threshold for a specific permitted process (for example, combustion of diesel oil in Tier 0-3 engines, exceeding 30 gallons or 5 hours per year of non-emergency use, except for agricultural and medical industry sectors);
- Report greenhouse gases (GHGs) under the Mandatory Reporting Rule (MRR);
- Hold permit(s) to emit 250 tpy or more of any nonattainment criteria pollutant (“Criteria Facility”); or
- Are classified as “high priority” under Assembly Bill (AB) 2588 (Air Toxics “Hot Spots” Act).

Facilities in the six Group A air districts that are already required to report GHG emissions (MRR), criteria pollutants, or air toxics under AB 2588 have begun reporting. Full reporting of stack data will be due in 2023 for 2022 emissions data to the air district in which they reside. Group B districts will begin reporting in 2024.

Required data for reporting under CTR includes:

- Device information;
- Process descriptions and annual activity levels;
- Actual emissions for each pollutant;
- Methodology for calculating emissions; and
- Stack/emissions release location information (e.g., location, temperature, velocity, etc.).

Facilities currently reporting through the MRR or Criteria Facilities will also need to report their portable diesel engine usage for any units greater than 50 brake horsepower (bhp) starting in 2023 for 2022 data.

Abbreviated reporting of throughput data and facility information will be allowed for certain sectors, including:

- Agricultural facilities;
- Facilities only operating natural gas-fired boilers/heaters;
- Facilities only operating diesel emergency generators or fire pumps; and
- Gasoline dispensers.

CARB has released guidance documents to assist facilities with determining the applicability of the regulation, as well as what data is required. Additional information is available on the CARB website at:

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

### Air Quality Tip

*Unless otherwise subject to CTR reporting, consider staying below the Reporting Thresholds for Permitted Processes to remain out of reporting, if possible. For example, keep non-emergency use of Tier 0-3 diesel engines below 5 hours. For more information, see Tables A-1 to A-3, starting on page 35 of the currently available regulation text: [CTR Unofficial Regulation Text \(ww2.arb.ca.gov\)](http://ww2.arb.ca.gov).*

### Upcoming Online EH&S Training Offered by Yorke Engineering

- Northern California Air Quality Regulations, Permitting, and Compliance Seminar: Nov. 1, 2, 8, 9, 10, 2022 (3-Hour Sessions)
- California Waste and Water Environmental Regulations: Permitting, Compliance, and Reporting Seminar: Oct. 11, 13, 18, 20, 2022 (4-Hour Sessions)
- California Industrial Hygiene and OSHA Safety Regulations Seminar: Sept. 20, 21, 27, 28, 2022 (4-Hour Sessions)  
Class Info at: <http://yorkeengr.com/classes>

### Upcoming Due Dates for 2022/2023\*

- CARB LCFS Q2 Fuel Report..... 9/30/22
- CARB GHG Cap-and-Trade Annual Compliance Surrender ..... 11/1/22
- CARB LCFS Q3 Fuel Report..... 12/31/22
- CARB On-Road HDDVs Must Be 2010 Engine or Newer ..... 1/1/23
- CARB Off-Road Diesel Compliance by Fleet Average or BACT (All Fleets) .. 1/1/23
- CARB On-Road TRUCRS Reporting for Flexibility Options ... 1/31/23
- CARB Off-Road DOORS Reporting for All Fleets..... 3/1/23
- CARB PERP Reporting: Equip. Units, Low-Use, Large Fleet Avg. .... 3/1/23
- CARB Refrigerant Reporting for Medium/Large Systems (≥ 200 lbs) . 3/1/23
- CARB GHG Semiconductor Report.. 3/1/23
- Semi-Annual Title V Report .. Semi-Annually
- Annual Title V Compliance Cert. ... 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 RULE CHANGES

For full details on changes below, go to: [http://www.valleyair.org/Workshops/public\\_workshops\\_idx.htm](http://www.valleyair.org/Workshops/public_workshops_idx.htm)

### ▪ Rules 4401, 4409, 4455, 4623, and 4624: LDAR Requirements at Oil and Gas Facilities, Refineries, Chemical Plants, and Organic Liquid Storage/Transfer Operations

As part of AB 617 expedited Best Available Retrofit Control Technology (BARCT) review, the San Joaquin Valley Air Pollution Control District (SJVAPCD) is proposing to update the Leak Detection and Repair (LDAR) requirements to sources subject to SJVAPCD Rules 4401, 4409, 4455, 4623, and 4624. These rules limit volatile organic compound (VOC) emissions from the following source categories:

- Rule 4401 applies to steam-enhanced crude oil production wells;
- Rule 4409 applies to light crude oil production facilities and natural gas production and processing facilities;
- Rule 4455 applies to refineries, gas liquids processing facilities, and chemical plants;
- Rule 4623 applies to organic liquid storage tanks; and
- Rule 4624 applies to the transfer of organic liquids.

The SJVAPCD is proposing to amend the rules above to lower leak thresholds, increase inspection frequency, and clarify definitions. The proposed amendments will also improve consistency across the various LDAR rules.

Proposed amendments to Rule 4401 will lower the leak threshold for gas leaks from 2,000 parts per million by volume (ppmv) to 500 ppmv and

change the inspection frequency from annual to quarterly. An extended repair period is also proposed for instances in which a rig-up operation is required to complete the repair.

Proposed amendments to Rule 4409 include lowering the gas/vapor leak threshold from 2,000 ppmv to 500 ppmv and lowering the liquid component leak threshold from 1,000 ppmv to 500 ppmv. An extended repair period is also proposed for instances in which a rig-up operation is required to complete the repair.

Proposed amendments to Rule 4455 include lowering the leak thresholds for pumps, compressors, and other components in gas/vapor service from 1,000 ppmv to 500 ppmv. Components with lower leak thresholds (from 100 ppmv to 500 ppmv) will remain unchanged. The proposed amendments will also remove the option for SJVAPCD approved annual inspections and ongoing inspections will be required on a quarterly basis.

Proposed amendments to Rule 4623 include establishing a gas leak threshold at 500 ppmv (compared to 10,000 ppmv). The proposed rule also established an allowable number of minor gas leaks (500 ppmv to 10,000 ppmv) during SJVAPCD inspections and establishes allowable repair times. The proposed

changes also include tank cleaning requirements for fixed-roof tanks.

Proposed amendments to Rule 4624 include establishing a gas leak threshold at 500 ppmv (compared to 1,000 ppmv) for organic liquids other than gasoline. The proposed rule also established an allowable number of minor gas leaks (500 ppmv to 1,000 ppmv).

Proposed changes to the LDAR requirements would become effective January 1, 2024, and facilities subject to the requirements of Rules 4401, 4409, 4455, 4623, and/or 4624 would be required to submit permit applications to incorporate the updated requirements by January 1, 2023.

## SJVAPCD COMPLIANCE DEADLINES ON RECENT RULES

For full details on changes below, go to: <https://www.valleyair.org/rules/1ruleslist.htm>

Several recently revised rules have compliance deadlines that affect some boilers, process heaters, engines, and flares. The rules required submittal of permit applications and/or Emission Control Plans and compliance with the specified emission limits and other rule requirements. Table 1 provides a summary of recent and upcoming rule compliance dates. Many emissions units will have compliance due dates as early as the end of 2023.

**Table 1: Recent and Upcoming Rule Dates**

Rule	Application Submittal Date	Compliance Date
<b>4306/4320:</b> Boilers and Process Heaters	May 1, 2022	Dec. 31, 2023
<b>4306/4320:</b> Boilers and Process Heaters <i>(Extended Compliance Schedule)</i>	May 1, 2028	Dec. 31, 2029
<b>4311:</b> Flares	July 1, 2022	Dec. 31, 2023
<b>4702:</b> Engines	Aug. 1, 2022	Dec. 31, 2023
<b>4702:</b> Engines <i>(Lean Burn, Agriculture Operations)</i>	Aug. 1, 2028	Dec. 31, 2029

*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 1,500 customers, including a wide variety of industrial facilities and government organizations throughout California.*