

Air Quality Update

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CARB CTR PHASE 3

Background

Assembly Bill (AB) 617 created the Criteria and Toxics Reporting (CTR) Regulation, California's uniform statewide system for annual emissions reporting of criteria pollutants and toxic air contaminants (TACs). CTR became effective January 1, 2020, and has been phasing in by air district group and sector. CTR identifies which facilities must report based on greenhouse gas (GHG) reporting, criteria pollutant emissions, elevated toxics risk, or specific permitted processes. CTR requirements are submitted as part of each air district's annual emissions reporting program.

New for DY2025

Beginning with data year (DY) 2025, Phase 3 of the California Air Resources Board's (CARB's) CTR Regulation applies to Additional Applicability Facilities in District Group A, which includes the South Coast Air Quality Management District (SCAQMD), San Diego County Air Pollution Control District (SDAPCD), San Joaquin Valley Air Pollution Control District (SJVAPCD), Imperial County Air Pollution Control District (ICAPCD), Sacramento Metropolitan Air Quality Management District (SMAQMD), and Bay Area Air District (Air District). Facilities with Phase 3 permitted processes that meet the activity thresholds listed in CTR Appendix A, Table

A-3¹ must now report emissions or activity data, even if they have not reported to local air districts before. Examples of Phase 3 permitted processes now subject to reporting for District Group A include:

- Cremation of Humans or Animals;
- Fiberglass Manufacturing;
- Semiconductor Manufacturing;
- Oil and Gas Extraction and Production;
- Metal Melting and Foundries;
- Long-Term Asbestos Removal; and
- Large Natural Gas or Propane Combustion [\geq 75 Million Standard Cubic Feet (MMSCF) or 77,000 Million British Thermal Units (MMBtu) per Year].

Permitted facilities are required to submit emissions inventory reports to document criteria air pollutants and TAC emissions to local air districts. For facilities in the SCAQMD, emissions reports are due May 1, 2026, for the previous year's emissions. Due dates for other air districts may vary.

Coming in DY2026

Beginning with DY2026 and subsequent years, District Group A facilities subject to Phases 1, 2, and 3 must report additional TACs listed in CTR Appendix B, Table B-3². Facilities in Phases 1, 2, and 3 should prepare to quantify criteria pollutants and TACs for DY2026 reporting.

District Group B facilities are subject to Phase 3 beginning with DY2027.

Air Quality Tip

Under the CARB Off-Road Diesel Regulation, starting January 1, 2026, Tier 1 engines for large fleets and Tier 0 engines for medium fleets are not permitted to operate in California, unless they are designated under an exemption (e.g., low-use).

Upcoming Online EH&S Training Offered by Yorke Engineering

- Northern California Air Quality Regulations, Permitting, and Compliance Seminar (3-Hour Sessions):
May 12, 13, 19, 20, and 21, 2026
- California Industrial Hygiene and OSHA Safety Regulations Seminar (4-Hour Sessions):
March 17, 18, 24, and 25, 2026
Class Info at: <https://yorkeengr.com/classes>

Upcoming Due Dates for 2026*

- CARB Off-Road DOORS Reporting for All Fleets.....3/1
- CARB PERP Reporting: Equipment Units and Low-Use Engines.....3/1
- CARB Refrigerant Reporting for Medium/Large Systems (\geq 200 lbs)..... 3/1
- CARB GHG Semiconductor Report..... 3/1
- U.S. EPA GHG Report.....3/31
- CARB LCFS Q4 Fuel Report.....3/31
- CARB ACF Report for SLGA Fleets.....4/1
- CARB GHG > 25K Metric Tons.....4/10
- 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
- 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.

¹ https://www.aqmd.gov/docs/default-source/planning/annual-emission-reporting/table-a-3-phase-3.pdf?sfvrsn=6dd56b7e_5.

² https://ww2.arb.ca.gov/sites/default/files/2022-02/Unofficial%20CTR_Jan2022_0.pdf.

BAY AREA AIR DISTRICT REGULATION 11, RULE 18: 2025 DRAFT AMENDMENTS TO REDUCE HEALTH RISKS FROM AIR TOXICS

The Air District's Regulation 11, Rule 18, adopted in 2017, regulates toxics emissions from existing facilities to prevent unacceptable health risks to nearby communities. The Air District is proposing rule amendments to improve implementation and accelerate risk reduction, with draft updates already released in 2025 and potential adoption in early 2026.

Purpose and Scope of Rule 11-18

Rule 11-18 targets TACs, specific pollutants known to increase the likelihood of cancer, cause serious illness, or present chronic health hazards, as listed in Regulation 2, Rule 5. Approximately 200 chemicals fall into this category. Although thousands of facilities report toxics emissions to the Air District, only a subset is subject to Rule 11-18 review.

Each year, the Air District calculates a screening health risk and assigns facilities a "prioritization score." Facilities with scores above a defined screening threshold (10) must undergo a full Health Risk Assessment (HRA). Currently, about 350 facilities across a variety of sectors are expected to undergo Rule 11-18 review. The current list of facilities can be found on the Air District's website at:

<https://www.baaqmd.gov/community-health/facility-risk-reduction-program/facility-risk-reduction-list>

Key Requirements Under Rule 11-18

Health Risk Assessments (HRAs)

Facilities identified through the prioritization process must undergo an HRA. Under the current rule version, the Air District conducts these assessments

internally. Results are compared to established Risk Action Levels to determine which sources contribute most to facility-wide health risks and whether additional action is needed.

Risk Reduction Plans (RRPs)

If an HRA indicates that risks exceed the Risk Action Levels, the site must develop a Risk Reduction Plan (RRP). The plan must outline how the facility will either reduce health risks below the established thresholds or demonstrate that significant risk sources are implementing Best Available Retrofit Control Technology for Toxics (TBARCT).

Why Amendments Are Being Proposed

Since adoption of Rule 11-18, implementation of the rule has taken longer than anticipated, slowing progress in reducing community health risks. To address this, the Air District initiated a two-phase amendment process:

- **Phase 1:** Procedural improvements and implementation efficiency; and
- **Phase 2 (future):** Evaluation of increase in rule stringency.

The next stages include preparing the Proposed Rule Package and a Board hearing, anticipated in early 2026.

Highlights of the 2025 Draft Amendments

The 2025 draft amendments are designed to improve consistency and reduce delays, while maintaining Air District oversight.

Key changes include:

- **Facility-Prepared Preliminary HRAs:** Facilities will prepare their own HRAs using Air District-approved modeling protocols. Work can be done internally or by engaging consultants. The Air District will review the modeling. Shifting HRA preparation to the facility is expected to streamline reviews and increase efficiency.
- **Standardized Review Process and Timelines:** The process will follow four main stages: modeling protocol, preliminary HRA, public comment, and final HRA. There will be specific timelines for each stage.
- **Incorporating New Emissions Data:** The amendments clarify how updated emissions information, such as source test results, should be incorporated into HRAs.
- **Prioritization Score Updates:** Facilities may recalculate and request reconsideration of their prioritization scores.

What This Means for Facilities and Next Steps

The Air District is reviewing public comments on the draft amendments, with proposed updates expected to go to a public hearing before the Board of Directors in early 2026.

Understanding these potential amendments allows facilities to plan for HRA preparation and risk reduction actions efficiently, ensuring compliance under the updated Rule 11-18 framework.

Yorke Engineering, LLC specializes in air quality and environmental consulting for stationary and mobile sources, including dispersion modeling, health risk assessments, permitting, emissions inventories, air quality compliance systems, etc. Yorke Engineering has assisted over 2,200 customers, including a wide variety of industrial facilities and government organizations throughout California.