

Air Quality Update

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February 24, 2026 – SCAQMD

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. 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 [≥ 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

- Southern California Air Quality Regulations, Permitting, and Compliance Seminar (3-Hour Sessions):
May 12, 14, 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*

- Title V – 500-SAM.....2/28
- RECLAIM APEP (Cycle 1)3/1
- SCAQMD 218.2 CEMS Report3/1
- Title V – 500-ACC3/1
(Except RECLAIM Cycle 2 8/29)
- 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 (≥ 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
- SCAQMD Rule 1110.2 Quarterly4/15
- RECLAIM Quarterly (Cycles 1 & 2)..... 4/30
- CARB LCFS Annual Fuel Report..... 4/30
- SCAQMD AER.....5/1
- CARB GHG 10-25K Metric Tons
and All Electric Retailers.....6/1
- CARB Gas-Insulated Equipment
GHG Report6/1
- CARB LSI DOORS Reporting for
Medium and Large Fleets.....6/30
- CARB LCFS Q1 Fuel Report.....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.*

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.

SCAQMD ADOPTED RULE CHANGES

For full details on changes below, go to: <https://www.aqmd.gov/home/rules-compliance/rules/recent-actions>

▪ Rule 1171: Solvent Cleaning Operations

Applicability and Purpose

On June 6, 2025, the SCAQMD amended Rule 1171. Rule 1171's purpose is to reduce volatile organic compounds (VOCs), TACs, and stratospheric ozone-depleting compounds from solvent cleaning operations. Rule 1171 applies to anyone who uses cleaning solvents in the SCAQMD.

Rule 1171 Amendments Overview

Rule 1171's amendments include the phasing out of para-Chlorobenzotrifluoride (p-CBtF) and tert-butyl acetate (t-BAc), establishing VOC content limits for energy curable printing of lamps and reflectors, and establishing alternative usage limits for electricity and water utilities and aerosol cleaning.

Rule 1171's amendments will affect facilities using solvent cleaners containing p-CBtF or t-BAc, suppliers and distributors of cleaning solvents with p-CBtF or t-BAc, automotive refinishing shops, electric/water utility providers, and energy curable printing operations.

Table 1 of Rule 1171 sets the VOC content limits, Table 2 sets the alternative usage and product weighted-maximum incremental reactivity (PW-MIR) limits for electrical and water utilities, and Table 3 of the rule sets the usage limits of solvent cleaner usage for solvent cleaning of automobile parts, batteries, and other solvent cleaning activities.

Rule 1171 Deadlines

There are three important dates in Rule 1171 for the p-CBtF and t-BAc phase-

out. Solvent cleaning materials manufactured *after* January 1, 2026, and containing more than 0.01% by weight of p-CBtF and t-BAc cannot be used for solvent cleaning activities. Solvent cleaning materials manufactured *prior* to January 1, 2026, containing more than 0.01% of p-CBtF and t-BAc can be sold or supplied until July 1, 2027, and used until July 1, 2028.

Other Rules Affected

Similar to Rule 1171's amendments to phase out p-CBtF and t-BAc from solvent cleaning materials subject to Rule 1171, the SCAQMD is in the process of amending other source-specific rules to phase out p-CBtF and t-BAc, including Rule 1107 (Coating of Metal Parts and Products), Rule 1124 (Aerospace Assembly and Component Manufacturing Operations), Rule 1113 (Architectural Coatings), Rule 1122 (Solvent Degreasers), and Rule 1130 (Graphic Arts), among others.

▪ Rule 462: Organic Liquid Loading Applicability and Purpose

On August 1, 2025, the SCAQMD adopted amendments to Rule 462, which regulates VOC emissions during the transfer of organic liquids with a true vapor pressure of 1.5 pounds per square inch absolute (psia) or greater (e.g., gasoline and ethanol) into tank trucks, trailers, and railcars. The rule also establishes contingency measures for applicable ozone standards for the reduction of VOCs.

Lower VOC Limit for VR Systems

Under Rule 462 Section (d)(1)(D), the allowable VOC emission rate from

vapor recovery (VR) and disposal systems at large loading facilities ("Class A" facilities that load more than 20,000 gallons per day) was reduced from 0.08 pound (lb) to 0.04 lb per 1,000 gallons of organic liquid transferred. According to the SCAQMD, the amendment to lower the VOC emission rate formalizes best performance, since the source testing data reviewed by the SCAQMD during rulemaking reportedly showed that most facilities were already meeting the new limit. Permit modifications incorporating the new limit are due by February 1, 2027 [Rule 462 Section (e)(1)(C)].

New 5-Year Source Testing Requirement

To verify ongoing compliance, each Class A facility must conduct periodic source tests every 60 months using United States Environmental Protection Agency (U.S. EPA) or SCAQMD-approved methods [Rule 462 Section (f)(8)]. Facilities that are not already conducting periodic source tests must submit a source test protocol by August 1, 2026, and complete testing by August 1, 2027.

Monthly OGI Inspections

Beginning August 1, 2026, Class A and B facilities (i.e., facilities that load more than 4,000 gallons per day) must perform monthly optical gas imaging (OGI) inspections to detect fugitive VOC emissions [Rule 462 Section (d)(6)]. Each detection of a vapor or liquid leak must be addressed within 3 days, and repaired or replaced components must be reinspected.

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.