Air Quality Update

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August 28, 2026 – SJVAPCD

ACF REGULATION UPDATE

Following the 2025 amendments to California's Advanced Clean Fleets (ACF) Regulation, applicability is now limited to State and Local Government Agency (SLGA) fleets, after the California Air Resources Board (CARB) repealed provisions affecting private and federal fleets. Although private fleets are no longer directly subject to ACF compliance requirements, CARB has indicated that obligations may still arise when private fleets are contracted by or leased to State and local governments due to CARB's proposed interpretation of "hiring compliant fleets." CARB has received numerous comments regarding this interpretation, since it would effectively require private fleets performing public contract work to comply with ACF-related vehicle turnover requirements. Nevertheless, ACF applicability is limited to SLGA fleets.

For SLGA fleets, the core framework remains unchanged. Agencies that own, lease, or operate medium- and heavy-duty vehicles must continue transitioning to zero-emission vehicles (ZEVs) through established compliance pathways. In April 2026, CARB delayed several key milestones, including extending the 50% ZEV purchase requirement and moving the 100% ZEV purchase target to 2030. CARB also provided additional flexibility for waste and wastewater fleets using the ZEV Milestone Option for compliance. No new Board hearings have been scheduled for these revisions, and CARB has not yet finalized whether the changes are "substantial" enough to require readoption.

CARB GHG CAP-AND-INVEST

CARB approved amendments to the Greenhouse Gas (GHG) Mandatory Reporting Regulation (MRR) and Cap-and-Invest Regulation on May 29, 2026. The regulations apply to large combustion facilities; fuel, natural gas, and carbon dioxide (CO_2) suppliers; and electricity importers. New entities under the amended regulations include cement importers and hydrogen producers and importers. The applicability threshold for the MRR is 10,000 metric tons of CO_2 equivalent ($MTCO_2e$) emitted, while the threshold for Cap-and-Invest is 25,000 $MTCO_2e$ of covered emissions. The amendments primarily affect the implementation of the Cap-and-Invest Program and include lower statewide allowance budgets, changes to compliance periods, increased industry allowances with updated cap factors, allowances for electricity purchases, and decarbonization incentives. These changes will significantly affect compliance planning and programs that rely on proceeds from CARB allowance auctions.

SB 253, CLIMATE CORPORATE DATA ACCOUNTABILITY ACT

Senate Bill (SB) 253 requires companies with annual revenues exceeding $1 billion that do business in California to publicly disclose their GHG emissions. CARB's first SB 253 regulation is anticipated to be approved in Fall 2026 with a focus on applicability criteria, initial reporting requirements, and fee collection requirements. Based on recent guidance posted by CARB, Scope 1 and 2 GHG emissions reporting is anticipated to be due November 10, 2026.

CARB will amend this regulation to incorporate future requirements under SB 253, including Scope 3 reporting and assurance verification, both required next year.

Air Quality Tip

Reminder: Pursuant to Code of Federal Regulations (CFR) Title 40 Part 84.108, owners and operators of existing refrigeration systems with a full charge of 1,500 pounds or more and a refrigerant global warming potential (GWP) greater than 53 must install automatic leak detection systems by January 1, 2027.

Upcoming Online EH&S Training Offered by Yorke Engineering

- Northern California Air Quality Regulations, Permitting, and Compliance Seminar (3-Hour Sessions):
  November 3, 4, 10, 11, and 12, 2026
- California Industrial Hygiene and OSHA Safety Regulations Seminar (4-Hour Sessions):
  October 20, 21, 27, and 28, 2026
  Class Info at: https://yorkeengr.com/classes

Upcoming Due Dates for 2026/2027*

- CARB LCFS Verification Statement .. 8/31/26
- CARB LCFS Q2 Fuel Report 9/30/26
- SJVAPCD CEMS Quarterly 10/30/26
- CARB GHG Cap-and-Invest Annual Compliance Surrender....... 11/1/26
- CARB SB 253 Scope 1 & 2 Report ... 11/10/26
- CARB LCFS Q3 Fuel Report 12/31/26
- CARB Off-Road Diesel Compliance by Fleet Average or BACT (All Fleets).. 1/1/27
- SJVAPCD CEMS Quarterly 1/30/27
- SJVAPCD Rule 4311 Annual Monitoring Report 1/30/27
- CARB On-Road TRUCRS Reporting for Flexibility Options... 1/31/27
- SJVAPCD Rule 2280 Portable Equipment Report ....≤ 30 Days from End of Quarter
- 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 RULE 9510 ISR

ISR Applicability

San Joaquin Valley Air Pollution Control District (SJVAPCD) Rule 9510, Indirect Source Review (ISR), was originally adopted in 2005 to mitigate increases in emissions of nitrogen oxides (NO_x) and particulate matter smaller than 10 microns (PM_{10}) from mobile and area sources associated with the construction and operation of new industrial, commercial, residential, transit, and other types of projects in the San Joaquin Valley.

ISR requirements may apply to projects that meet certain size thresholds, including:

- 50 residential units;
- 2,000 square feet (sq. ft.) commercial;
- 25,000 sq. ft. light industrial;
- 100,000 sq. ft. heavy industrial;
- 20,000 sq. ft. medical or recreational;
- 39,000 sq. ft. general office; or
- 9,000 sq. ft. educational or other uses.

Reconstruction projects and new developments subject to SJVAPCD permits are exempt from ISR rule requirements.

ISR REQUIREMENTS

Projects subject to ISR are required to submit an Air Impact Assessment (AIA) application and mitigate:

- 20% of construction equipment exhaust NO_x;
- 45% of construction equipment exhaust PM_{10};
- 33% of operational NO_x; and
- 50% of operational PM_{10}.

Developers are encouraged to reduce as much air pollution as possible through on-site mitigation or incorporating clean air design measures into the project. Some examples include the use of clean off-road construction equipment, zero-emission or near-zero emission heavy-duty on-road truck fleets, zero-emission on-site equipment, installation of electric vehicle infrastructure, solar power, installation of bike paths and sidewalks, and high-efficiency building designs.

If the on-site mitigation measures do not achieve the required emission reductions, the developer is required to pay an off-site fee for the balance of the emission reductions required for the project. The off-site mitigation fees received are used by the SJVAPCD to fund emission reduction projects.

How to Apply

Submit an AIA Application

Projects subject to ISR requirements must prepare and submit an AIA application prior to filing an application for discretionary approval with the public agency. It is encouraged to submit the AIA application as early as possible. The application includes information such as project description, project schedule, site maps, and on-site emission reduction measures, as well as an application filing fee of $656 for residential projects and $982 for non-residential or mixed-use projects.

ISR Application Forms: https://www.valleyair.org/permitting/indirect-source-review-rule-overview/forms-and-applications/

AIA Review Timeline

Once the application has been submitted, the SJVAPCD has 10 calendar days to review it. If the application is incomplete, SJVAPCD staff will notify the applicant of any additional information needed. Once the application has been deemed complete, the SJVAPCD has 30 days to review and finalize the project.

Next Steps

Once the AIA is finalized, the SJVAPCD will send an approval letter, which includes:

- Monitoring and reporting schedule;
- Off-site mitigation fee schedule, if applicable; and
- Invoice for the project processing fees (based on SJVAPCD time).

Off-Site Mitigation Fees

If on-site reductions are insufficient, off-site mitigation fees are required for the construction emissions, operational emissions, or both. The off-site mitigation fees are calculated based on the actual estimated project emissions compared to baseline emissions (the statewide average equipment emissions for the construction phase and the estimated operational baseline emissions for the operational phase). The difference in emissions (in tons) is multiplied by the cost of NO_x ($9,350 per ton) or PM_{10} reductions ($9,011 per ton), plus an administrative fee. The SJVAPCD collected over $3 million in ISR fees in the 2024-2025 fiscal year from 351 projects. For large projects, fees can exceed $500,000. It is critical to incorporate ISR planning into the early stages of a project to minimize off-site mitigation fees.

Additional ISR Information: https://www.valleyair.org/permitting/indirect-source-review-rule-overview/

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 2,350 customers, including a wide variety of industrial facilities and government organizations throughout California.