



# EQUATE WORKING GROUP

EMISSIONS QUANTIFICATION AND TESTING EVALUATION

OCTOBER 30, 2019

## Overview

- Summary of Working Group #1
- Working Group #1 Comments/Responses – Part 1
- Source Test Tracking System
- Working Group #1 Comments/Responses – Part 2
- Statewide Efforts for Default Emission Factors
- Summary of Rule 301 Toxic Emissions Fee Changes (June 2019)

# SUMMARY OF WORKING GROUP #1

- Board directive **Part 1:**
  - Assess and improve the source test review/approval process
    - Present in **December 2019**
- Board directive **Part 2:**
  - Review and update default emission factors
    - Present in **June 2020**
- Overview of current protocol/report submission and review process
- Existing Challenges
- Proposed Solutions

## WORKING GROUP #1 - COMMENTS

- Part 1 to focus on source test reviews – responses provided
- Part 2 to focus on AER/AB 2588 – limited responses; more details in emission factor working group
- Update will be provided on status of statewide efforts for default emission factors



# SOURCE TESTING REVIEW AND TRACKING

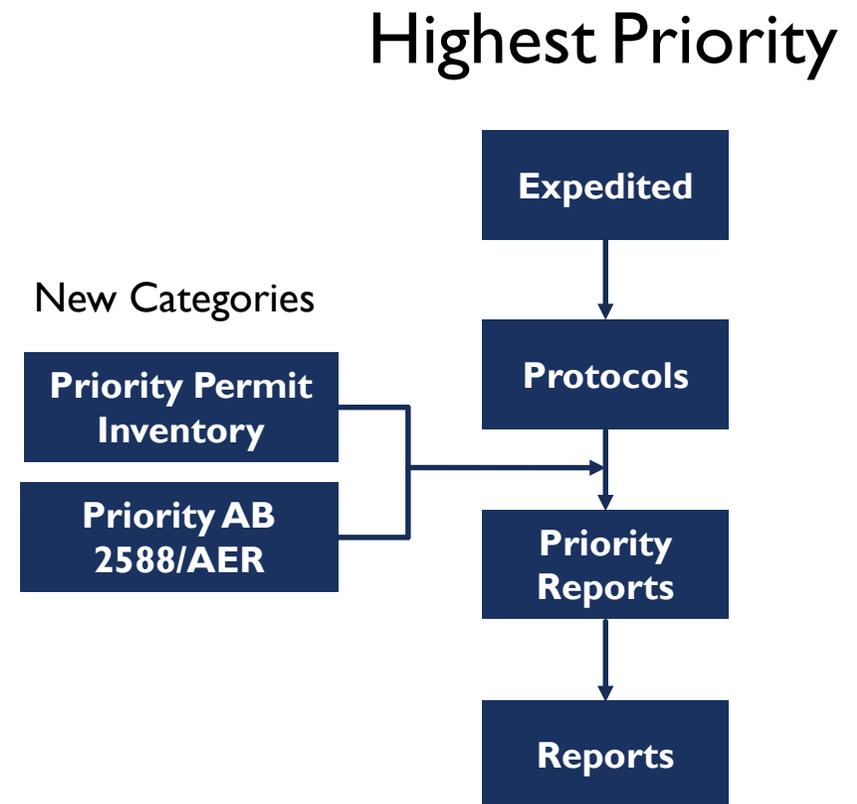
PART I

# WORKING GROUP #1 - COMMENTS/RESPONSES PART I

- I. Size/responsibilities of the source testing group
  - Source Test Group - Budgeted for 18 staff, currently operating with staff of 13 responsible for:
    - Protocol and Report Reviews
    - CEMS Certifications
    - In House Source Tests
    - Source Test Database Management
    - Barbeque Ignition Product, Small Boiler, and Water Heater Certifications
    - Technical Support and Rule Development

# WORKING GROUP #1 - COMMENTS/RESPONSES PART I

2. Priority Review should be given to tests for toxic emissions
  - Tracking system will flag and prioritize them



## WORKING GROUP #1 - COMMENTS/RESPONSES PART I

3. Goals should be set for source test review time
  - **Challenge:** Currently no system to quantify number of test protocols and reports received agency-wide
  - **Phase 1 Goal:** complete and implement online source test tracking system
    - Deadline or desired review completion can be specified, with goal to meet deadlines
    - Tracking system will allow for complete quantification of number of test protocols and reports received
  - **Phase 2 Goal:** utilize data gathered from tracking system to evaluate and adjust staffing as needed to complete reviews in a timely manner

## WORKING GROUP #1 - COMMENTS/RESPONSES PART I

4. Protocol/Report reviews need to be routed back to Engineering & Permitting (E&P) before being sent to the facility
  - Gives requestor the ability to review applicability of the results
  - Tracking system will identify that results have been submitted to requestor providing transparency of current status
5. Written comment - guidelines for use of source test results before test review and approval should be included on portal
  - Guidelines are being developed

## WORKING GROUP #1 - COMMENTS/RESPONSES PART I

6. Triplicate run requirements for source tests/use of source tests
  - Required by specific test method if used to quantify emissions for toxics
  - Required by permit condition or rule and test can be used for AB 2588, AER, and permitting or compliance
  - Required when being used to develop any reliable emission factor
  - Use of source tests for multiple purposes detailed in next table

# TEST RESULTS APPLIED TO MULTIPLE PURPOSES

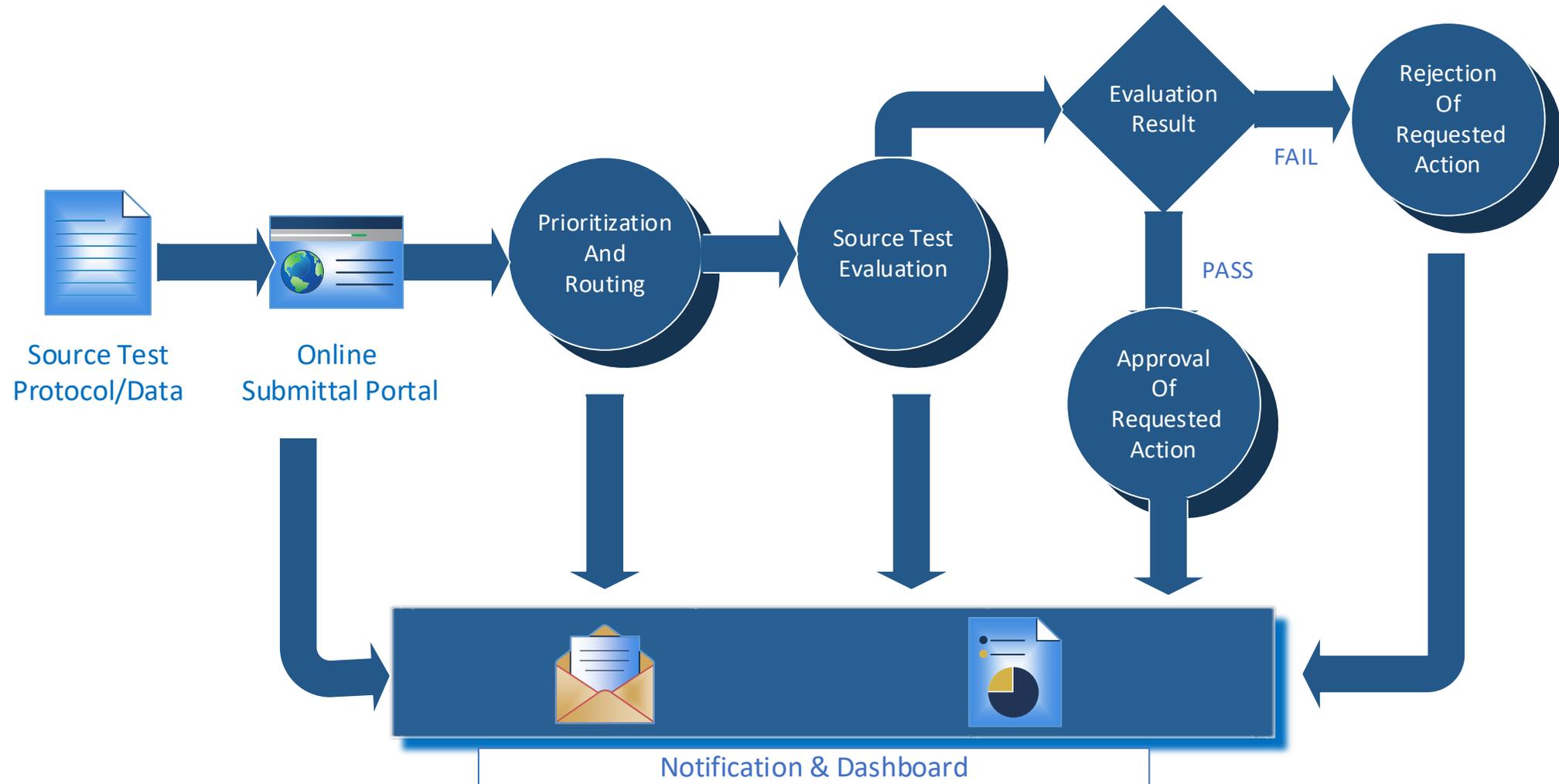
Test Type	Operating Load During Test	Approved Usage <sup>1</sup>		
		Compliance	AER	AB2588
Permitting	Maximum PTE	X	X	X
Permitting	High, Mid, Low	X	X	X

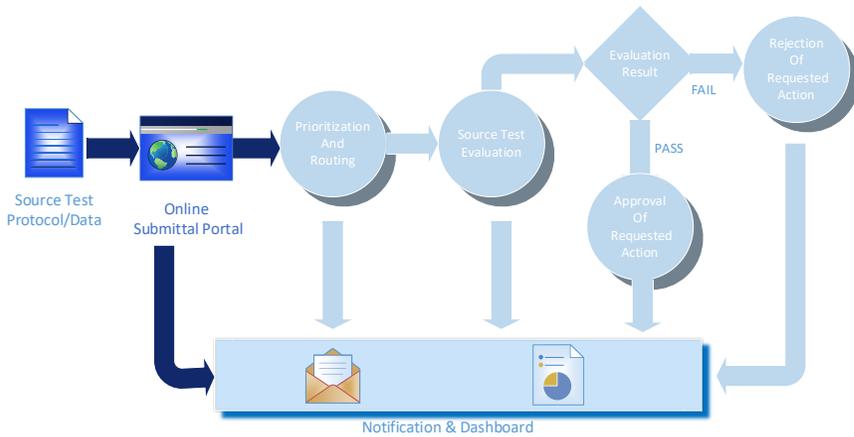
Test Type	Operating Load During Test	Approved Usage <sup>1</sup>		
		Permitting	AER	AB2588
Compliance	High, Mid, Low	X	X	X
Compliance	Normal as Found	X	*	*

<sup>1</sup> Triplicate runs may be required at each load condition based on pollutants being tested for

\* If demonstrated in protocol that average or worst case emissions are represented

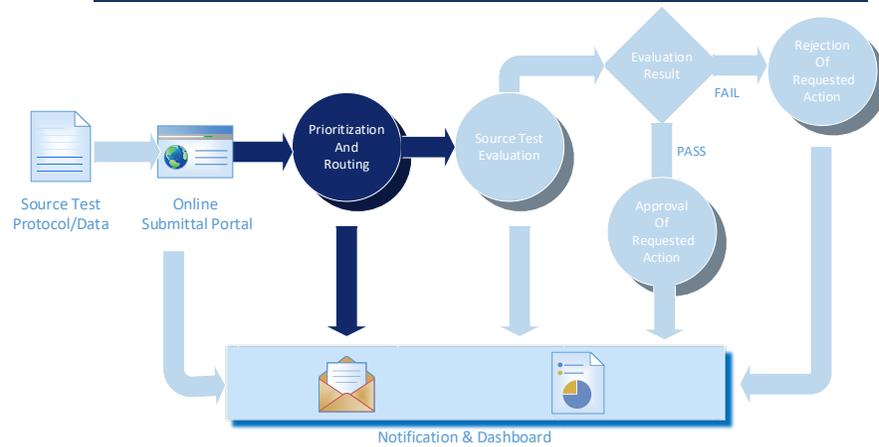
# SOURCE TEST TRACKING SYSTEM – KEY COMPONENTS





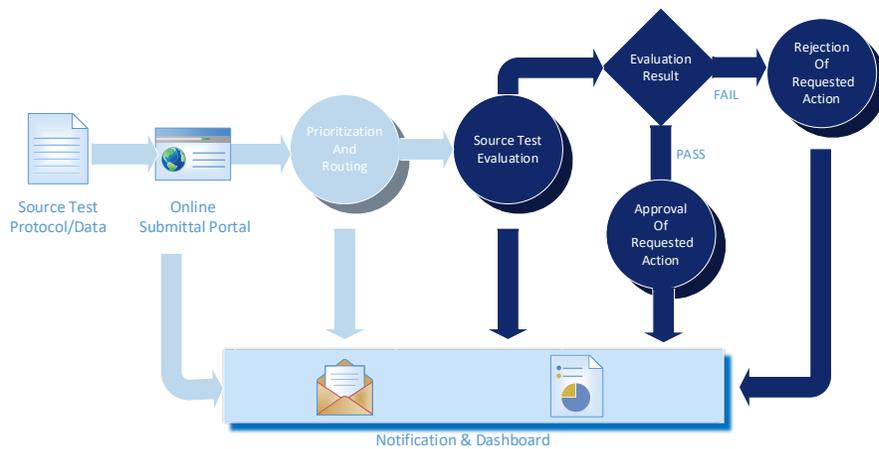
## SOURCE TEST TRACKING SYSTEM – ONLINE SUBMITTAL

- Creates a central mechanism for submittal of source test protocols and reports for review and approval
- Capability to identify purpose of submittal (permitting, compliance, AB 2588, etc.)
- Ability to request expedited review
- Verification for completeness (similar data and info as current ST-1 & ST-2 forms)
- Receipt for successful submission
- Ability to track status throughout the review process, including contact person



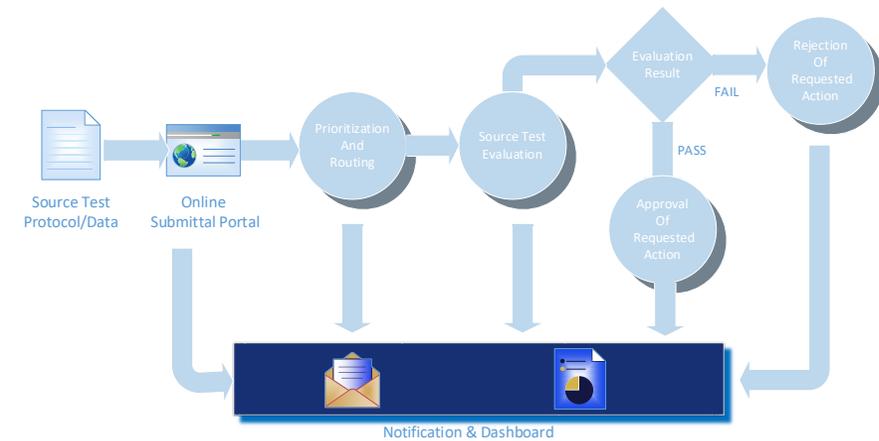
## SOURCE TEST TRACKING SYSTEM – PRIORITIZATION & ROUTING

- Automated status notification to submitter
- Increases efficiency, transparency and accountability of the process
  - Allows staff to review and prioritize
  - Establish internal tracking based on purpose of Source Test
  - Allows staff to accept Source Test directly, depending on requirements, or forward for detailed evaluation



## SOURCE TEST TRACKING SYSTEM – DETAILED SOURCE TEST EVALUATION

- Increased efficiency for source test evaluation process
  - Ability to prioritize and assign source tests internally
  - Automated routing based on evaluation results
- Facilitate communication between staff and submitter
  - Request for additional information
  - Technical feedback
- Notification to submitter during each major milestone



## SOURCE TEST TRACKING SYSTEM – NOTIFICATION & DASHBOARD

- Ability to track submission status during entire life cycle
- Real-time notification at each milestone of the process
- Tracking of total elapsed time for review/approval process
- Tracking of issues or delays and to seek any necessary remedies (programming or otherwise)
- Statistical reports

# BENEFITS

## External

- Meets Board direction (**Part I**) for improved source test review/approval process
- Online access to status information
  - Tracking progress
  - Reaffirms pending facility or agency actions

## Internal

- Supports efficient allocation of resources
- Reduce external requests for information by directing inquiries to online portal
- Improved tracking and quantification of protocol/report submissions
- Aid in future planning for staffing needs

# DISCUSSION

- Working Group Comments on Data Portal, Notification and Dashboard
- Next Steps for Part I



# DEFAULT EMISSION FACTORS

## PART 2

# WORKING GROUP MEETING #1 - COMMENTS/RESPONSES PART 2

## Written comments received

1. Results of source test review should be available when sent to E&P
  - System will provide notification that review is complete
  - Review needs to be approved by E&P
2. Review of default emission factors used for emissions reporting should not wait until January 2020
  - Staff currently reviewing existing South Coast AQMD AER guidelines and will provide an update at the next Working Group meeting
3. South Coast AQMD should consider working with refineries to develop source test and emission factors
  - Under consideration

# RESPONSE TO WORKING GROUP COMMENTS

Develop instructions for use of source test results before test has been reviewed and approved

## **AERs for CY2018 and Before**

- Source test results must be approved prior to use
- Source test must have been conducted during or before the subject report year
- Source test must reflect the equipment and its operation for the subject report year

## **AERs for CY2019 and After**

- **Source test results must have been submitted for review and approval prior to AER submittal due date**
  - Results considered valid until notified that they have been disapproved
- Source test must have been conducted during or before the subject report year
- Source test must reflect the equipment and its operation for the subject report year

# STATEWIDE EFFORTS FOR DEFAULT EMISSION FACTORS

	<b>CTR Uniform Statewide Methods</b>	<b>Statewide BACT/BARCT Clearinghouse</b>	<b>TARMAC Emission Factor Clearinghouse</b>	<b>Rule 301 – Review of Default Emission Factor</b>
<b>Agency</b>	CARB w/ CAPCOA	CARB w/ Air Districts	CAPCOA (TARMAC)	South Coast AQMD
<b>Direction</b>	CARB CTR (Article 2)	AB 617 (H&S Code Section 40920.8(a))	CAPCOA Board Goals	R301 Resolution (July 2019)
<b>Objective</b>	Establish uniform methods to report emissions for facility operators statewide	Identify BACT/BARCT for criteria and toxic pollutants	Provide central lookup for default toxic emission factors used by multiple air districts by equipment type	Initiate review of default emission factors used for emissions reporting; update guidelines as appropriate
<b>Status</b>	Developing guidelines for landfills, refineries, and power plants	Ongoing development	Developing database/spreadsheet content and design	1 <sup>st</sup> meeting January 2020

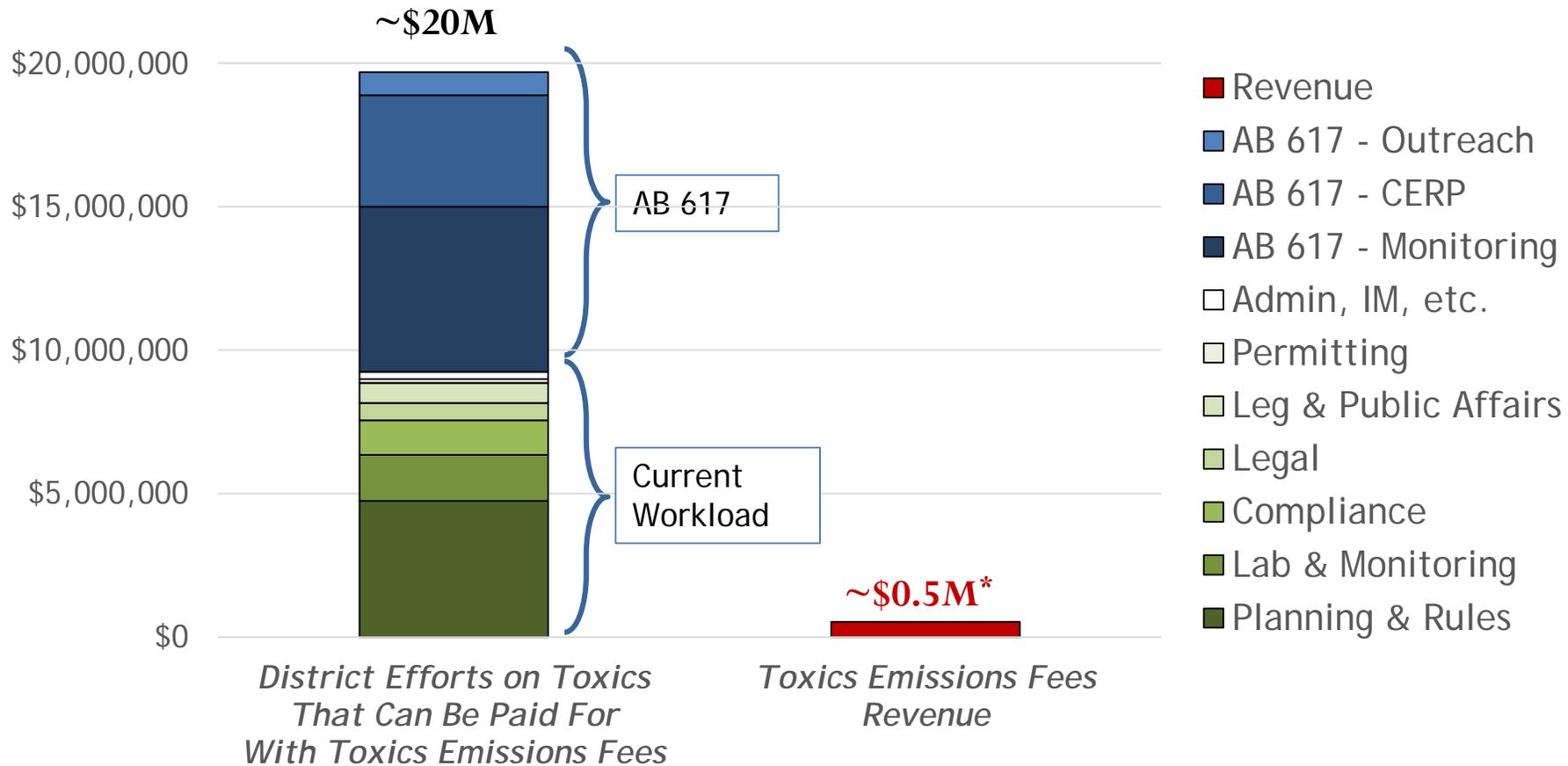
# SUMMARY OF TOXIC FEE CHANGES TO RULE 30 I

- June 2019 Amendment
  - Annual CPI-based fee increase: 3.5% across the board (both criteria and toxics)
  - New categories for toxic fees exceeding specified toxic thresholds:

<b>Toxic Fee Category</b>	<b>Effective January 1, 2020</b>	<b>Effective January 1, 2021</b>
Flat Fee	\$78.03	\$78.03
Per Device Fee	\$170.95	\$341.89
Cancer Potency-Weighted Emissions Fee	\$5.00	\$10.00

# TOXICS EMISSIONS FEES & DISTRICT WORKLOAD

Subset of District Efforts on Toxics vs. Emissions Fees



- Estimate only includes work programs focused on permitted source toxics
- Additional details provided in Appendix C of Final Staff Report
- [www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2019/2019-may3-028.pdf](http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2019/2019-may3-028.pdf)

\*~\$20M collected for criteria pollutant emissions

# BOARD APPROVED TOXICS EMISSIONS FEES

1) New Base Toxics Fee to recover costs for basic functioning of toxics reporting program (software + minimal staffing)

- \$78.03/facility if toxics reported

➔ **\$0.1M**

2) New Flat Rate Device Fee to recover costs for staff toxics inventory work

- \$341.89 per permitted device with toxics emissions
- Inventory workload highly correlated with number of devices

➔ **\$1.4M**

3) New Cancer Potency-Weighted Fee to recover costs for staff enforcement and related efforts for higher toxicity facilities (AB 617, monitoring, source testing, rulemaking)

- \$10 per cancer potency-weighted pound of toxics emissions
- Add Diesel PM to the list of 21 common toxics that require fees
- Ammonia and ozone depleters would not change

➔ **\$3.4M**

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**\$4.9M\***

*\*~\$4.4M higher than current fees*

# COMMENTS UNDER CONSIDERATION

- Define specific toxics by industry sector that need to be reported/tested
- Request that in-house data be pooled as default emission factors for small business
- Develop policy when adding toxic compounds for reporting purposes
- Other CARB and CAPCOA emission factor development and linkage to South Coast AQMD efforts

## DISCUSSION

- Next steps for Part 2
- Other topics for the next working group

# CONTACTS

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