



EQUATE WORKING GROUP #6

EMISSIONS QUANTIFICATION AND TESTING EVALUATION

DECEMBER 17, 2020

Overview

- Status of Source Test Submittal Online Portal
- Update on 2021 AER Reporting Season
- Update on CAPCOA/CARB Efforts
- Future Efforts
- Next Steps

STATUS OF SOURCE TEST SUBMITTAL ONLINE PORTAL

- Phase I: Discovery (requirements)
 - Started – April 2020
 - Completed – August 2020
- Phase II: Portal Development
 - Started – November 2, 2020
 - Estimated Completion – May 2021

PHASE I DETAILS

- Understanding of Current Workflow Process
- Met with representatives from all South Coast AQMD Divisions
 - Source Test Engineering
 - Engineering and Permitting
 - Compliance and Enforcement
 - Annual Emissions Reporting
 - Air Toxics Hot Spots (AB 2588)
- Prepared Business Process Model for Proposed Automated Workflow
- All Source Test Protocols/Reports to be submitted via Portal
- Presented Screen Design and proposed workflow at EQUATE WG Mtg #5

PHASE II DETAILS

- Eight (8) Development Sprints (each 3-4 weeks) including:
 - Submittal Process
 - Workflow process for each Division
 - Source Test Engineering review and approval
 - Workflow Portal
 - Source Test Dashboard
 - User Testing
- Application and Database deployment to Production

UPDATE ON 2021 AER REPORTING SEASON

- Reporting annual emissions for CY2020
- Submittal deadline: March 17, 2021 @ 5:00 pm
- Changes from last year:
 - AB 2588 Quadrennial Report due for facilities in Phase I B
 - Ability to Upload MS Excel Files for Reporting Storage Tank Emissions
 - Increase to Device Fees and Cancer-Potency Weighted Fees per Rule 30 I
 - Criteria Facilities and GHG Facilities Report Quadrennial List of Toxics per CTR

COMMENTS ON *DRAFT GUIDELINES ON THE USE OF APPROVED SOURCE TEST RESULTS FOR AER*

- Staff provided draft guidelines outlining current and historical practices by the AER group regarding how source test results are approved for use in annual emissions reports
- General comments included providing guidance for requirements and uses for other Divisions such as Compliance and AB 2588
- Received comment letters from LA Department of Water and Power (LADWP) and Southern California Alliance of Publicly Owned Treatment Works (SCAP)

KEY COMMENTS FROM LADWP AND SCAP

1. LADWP

- Emission factors calculated from source tests are more accurate than default factors, so should be able to use even if source test is not reviewed and approved
- Use of toxic defaults can lead to requirements to prepare health risk assessments or voluntary risk reduction plans under the Hot Spots program
- Implement improved source test submittal and review process prior to restricting use of unapproved source test results in AER
- Conditions for valid emissions data based on a source test are too restrictive

2. SCAP

- Guidelines should be applied going forward and not retrospectively

COMMENTS FROM EQUATE WORKING GROUP ON UPDATING/ESTABLISHING DEFAULT TOXIC EMISSION FACTORS

- Staff presented the review of default toxic emission factors available for AER and received comments to:
 1. Continue work on CARB and CAPCOA emission factor development and provide updates and linkages to South Coast AQMD efforts
 2. Work with industry groups to develop emission factors
 3. Use in-house source test data to establish/update default emission factors for specific industries, equipment, or processes

UPDATE ON CARB AND CAPCOA EFFORTS

■ CARB CTR and EICG Activities

- Proposed amendments to CTR and EICG were considered and approved by the CARB Board November 19th
- Awaiting clarification and guidance to be included in 15-day changes
 - Throughput to be reported when no quantifiable emission factor exists
 - Provisional risk values not to be used for AB 2588 regulatory purposes, rather to inform OEHHA prioritization
- Reporting requirements for Additional Applicability Facilities in South Coast AQMD jurisdiction begin with data year 2022 reported in 2023

■ CAPCOA Workgroup Activities

- **Uniform Guidelines for Electricity Generation Sector** – CAPCOA Board endorsed Engineering and TARMAC committees to participate in a CARB-led public process
- **CAPCOA Guidance on Uniform Reporting (Hierarchy)** – Presented to CAPCOA Board earlier this month for review and approval to release for public review in conjunction with Uniform Guidance

UPDATE ON CARB AND CAPCOA EFFORTS (cont.)

- Upcoming risk assessment guidance documents
 - Diesel Internal Combustion Engines (new)
 - Establishing modeling parameters
 - Auto-Body shops (update)
 - Working with Coating industry on new coating speciation profiles

INDUSTRY EFFORTS FOR POOLED SOURCE TEST

- Allowed under specific provisions of EICG (Section IX)
 - Requires approval of testing protocols and results
 - Results available for participating facilities use
 - Specific requirements for non-participating facility use
- Current CASA effort:
 - Planning to determine locations to sample wastewater
 - Looking for all the toxics that needed to be tested so they could do the test once
 - Asking how long the defaults would be good for
 - Complete process to come up with defaults could take 3-5 years

STAKEHOLDER INPUT ON ESTABLISHING PRIORITY LIST OF ACTION ITEMS

- Staff currently determining the amount of toxic emission source test data available for potentially updating/establishing default emission factors
- Will be running statistics in order to determine how many samples are necessary for a given confidence level
- Seeking input from the working group to prioritize the equipment, process, or industry that they would like staff to devote resources to in order to develop/update defaults
 - Note: limited staff resources available

NEXT STEPS

- Receive Stakeholder Input on Priorities by January 13, 2021
- Stationary Source Committee Meeting – January 22, 2021 (tentative)
- Establish Schedules for:
 - Frequency for future working group meetings
 - Timelines for establishing/updating defaults emission factors for prioritized industries/equipment

CONTACTS

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