

Clean Water SoCal Air Quality Committee

Committee Day
March 26, 2025

Air Quality Committee - Presenters

Steve Jepsen, Executive Director

David Rothbart, Regulatory Manager

Jennifer McMullin, AQ Vice-Chair

Randa AbuShaban, AQ Vice-Chair



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Air Quality Committee

Alison Torres, AQ Committee Chair

Jennifer McMullin, AQ Vice-Chair

Randa AbuShaban, AQ Vice-Chair

Contributors

Steve Jepsen, CWSC Executive Director

David Rothbart, CWSC Regulatory Manager

Air Quality Committee Meetings

- Monthly, typically on Tuesdays
- 10 A.M. to 12 P.M.
- Virtual via ZOOM
- All welcome to attend!



AIR QUALITY COMMITTEE MEETING

TUESDAY, MARCH 11, 2025

10:00 A.M. TO 12 NOON

Zoom: <https://zoom.us/j/95383954682?pwd=kwc77VWG107cKPyXvUlJKvmd5xMfi.1>

Phone: 669 444 9171

Meeting ID: 953 8395 4682

Passcode: 137859

AGENDA

1. Introductions/Walk-in Items
2. Review of Action Items from Previous Meeting(s)
3. SDAPCD Report
4. CARB CTR/EICG Update (Torres/Rothbart/Jepsen)
5. [SCAQMD PAR 1111 & 1121](#) - Furnaces/Water Heaters (McMullin/Torres)
 - Updated Concepts (ZEV Sales Targets); Public Consultation Meeting - [3/6/25](#)
 - Public Hearing - postponed until May 2, 2025
6. [SCAQMD PAR 1146 & 1146.1](#) - Boilers, Steam Generators & Process Heaters (McMullin)
7. [SCAQMD Proposed Rule 1445](#) - Plasma Arc Cutting (AbuShaban)
8. [SCAQMD Rule 317.1](#) (AbuShaban/Torres)
 - [PTE List](#)
9. Annual Emission Reports (McMullin/Torres)
 - [Annual Emission Reporting Workshop 1/15/25](#)
10. Emergency Diesel Generators (Torres/Jepsen)
 - [SCAQMD Proposed Rule 1110.4](#) - Emissions from Emergency Generators
 - EMA/HASC coordination to modify EPA Tier 4 inducement requirements
11. SCAQMD [Proposed Amended Rule 1133](#) (Torres/Rothbart)
12. SCAQMD [Proposed Amend Rule 1171](#) (Torres)
13. SCAQMD Advisory Groups (Rothbart)
14. SCAQMD/Clean Water SoCal Permit Streamlining (Torres/Rothbart)
 - [Permit Streamlining Task Force](#)
 - Permitting Enhancement Program (PEP)-[Board Update \(3/7/25\)](#)-
 - Permit Working Group- [Online Forms \(3/13/25\)](#)
14. CARB [Advanced Clean Fleets Regulations](#) (Torres/Rothbart/Jepsen)
 - CARB's [withdrawal letter](#) and EPA's [response](#)
 - EPA [notice](#)- Request for Congressional Review of CARB ACC II/ACT/Omnibus (CRA)
 - [AB 1594](#) - 13-year minimum useful life threshold
 - [CARB Draft 2025 Mobile Source Strategy](#) and [Low Carbon Fuel Standard](#)
15. Next Meeting

Air Quality Agencies

Federal



US EPA

Regulates stationary, area, and mobile sources including interstate transportation



Trains



Ships



Planes

State



CARB

Regulates mobile and area sources of air pollution



Cars



Trucks



Buses

Local

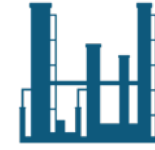


Local Air Districts

Regulates stationary and area sources of air pollution



Factories



Refineries



Residential woodstoves

Major Air Quality Developments

- CARB Air Toxics - Statewide Pooled Emissions Study
- CAA Non-Attainment Fees - SCAQMD Rule 317.1
- CARB Mobile Source Regulations
- Diesel Standby Generators

***CARB Air Toxics
Statewide Pooled Emissions Study***



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CARB's New Air Toxics Regulations

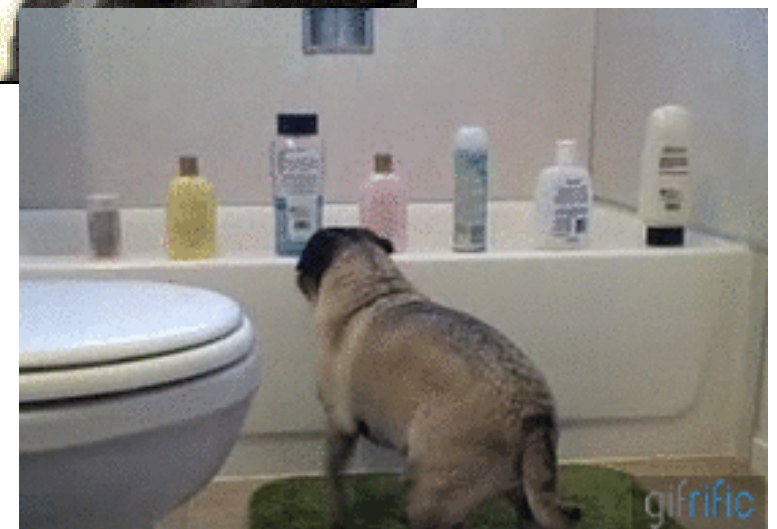
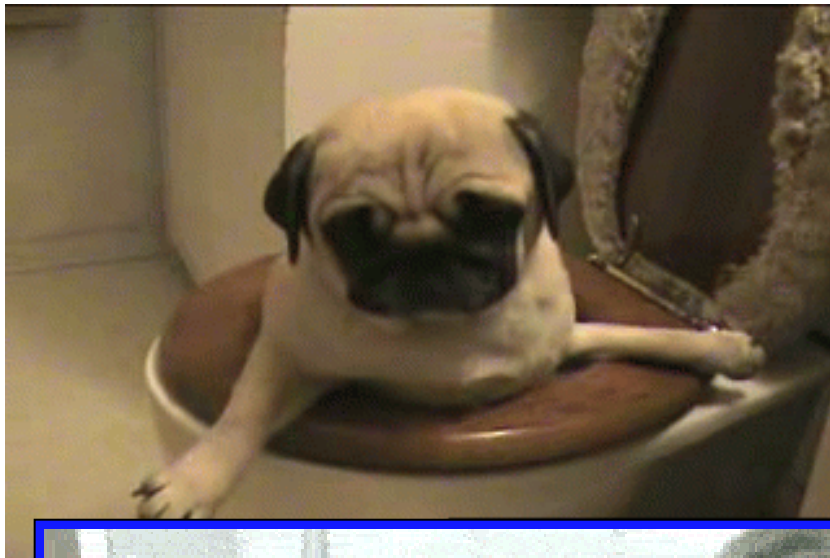
On November 19, 2020, the California Air Resources Board (CARB) amended two important air toxic emissions reporting regulations:

- **Emission Inventory Criteria and Guidelines for the Air Toxics "Hot Spots" Program (EICG) or (AB 2588):**
 - This regulation is the foundation for health risk assessments required by local air districts
- **Criteria and Toxics Reporting Regulation (CTR):**
 - In response to AB 197 and AB 617, this regulation implements a statewide annual reporting program for toxic air emissions

Purpose of CARB's New Air Toxics Regulations

- To ensure continued protection of public health by collecting more comprehensive emission data (**1,628 compounds**)
- Provide a better understanding of stationary source emissions
- **Enhance the public access to information on toxic pollutant emissions**
- Require the reduction of localized health risks at facilities that may present significant impacts
- To support community-focused efforts at CARB to **reduce criteria pollutant and air toxic emissions**

Idle Pugs are the Devil's Workshop



Applicability of CARB's Requirements

- Any facility with an air permit emitting ≥ 4 tons per year (TPY) or
- Any facility with an air permit with activity levels exceeding:
 - Composting of Organic Waste: > 1 TPY VOCs or PM
 - Recycling Facilities or MRFs: > 1 TPY VOCs or PM
 - Wastewater Treatment Plants: 10 MGD covered or 5 MGD uncovered (primary process)
 - Collection and Disposal of Refuse: 1 pound of benzene or vinyl chloride per year

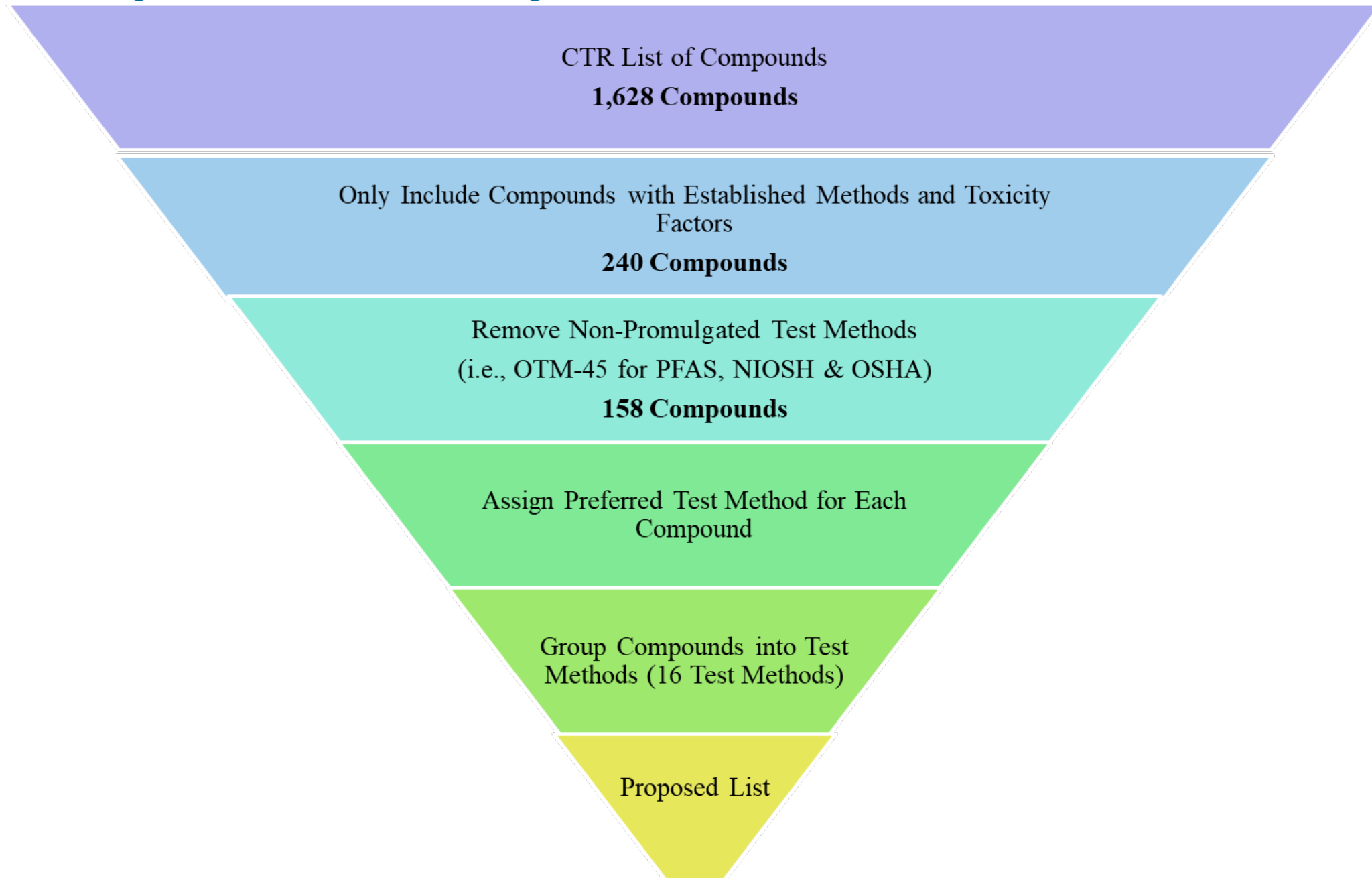
All these facilities will either need to perform source testing or join a pooled testing program

Concerns with the Implementation

- Most of the 1,628 compounds have no approved testing or sampling methods
- Most of these compounds have no known toxicity
- Reporting emissions of compounds without known toxicity to the public is like yelling fire in a crowded theater
- The cost per emission source for 158 of the 1,628 compounds is
- CARB and certain air districts have requested to test multiple locations at each facility



Proposed Compound Selection Criteria



CTR List of Compounds

1,628 Compounds

Only Include Compounds with Established Methods and Toxicity Factors

240 Compounds

Remove Non-Promulgated Test Methods (i.e., OTM-45 for PFAS, NIOSH & OSHA)

158 Compounds

Assign Preferred Test Method for Each Compound

Group Compounds into Test Methods (16 Test Methods)

Proposed List

CARB's Recommended Compound List

Description	Source of Method	Count of Pollutants	Some examples of pollutants	Count of POLs with Health values reported
CARB methods are listed	CARB only	24	Metals, Asbestos, PAHs/PAH-derivatives/POMs, PCBs, Dioxins, Dibenzofurans, organic compounds (formaldehyde, acetonitrile, benzene, chloroform, ethylene oxide, and more), and inorganics (chlorine, fluorine, chlorine trifluoride, and more)	164 including OEHHA (124) and *Others (40)
	CARB and other(s) (EPA, NIOSH, OSHA)	166		
	Total POLs with CARB methods	190		
No CARB method but EPA, NIOSH or OSHA methods are listed	EPA, NIOSH, and OSHA	494 including EPA (228), NIOSH and/or OSHA (266)	Pesticides, PFAS, Aldehydes, Phenols, halogenated organics, Glutaraldehyde, Aldicarb, Cyclohexanone, Palladium and Platinum compounds, Nitrophenols, nitrotoluene, <u>etc</u>	365 including OEHHA (116) and *Others (249)
Total count of pollutants with available methods	CARB, EPA, NIOSH, OSHA,	~ 684	All POLs listed above and more	~ 529 including OEHHA (240) and *Others (289)
No method is listed but GC/MS or LC/MS spectra scan is available	spectral information is available	~ 215	2-Amino-3,4-dimethylimidazo[4,5-f]quinoline, Hexafluoroacetone, 2,4-Diaminoanisole	~ 77 including OEHHA (14) and *Others (63)

Clean Water SoCal's Proposed Approach

- **Perform a statewide pooled emission study**
 - Only test for compounds with approved methods and known toxicity (158 compounds)
 - Test a few treatment plants with the highest potential to emit toxics
 - Test a few locations at these treatment plants with the highest potential to emit
- **Negotiate proposal with CAPCOA (i.e., all air districts in California)**
 - Via CAPCOA's Engineering Managers Committee
- **Request one regulatory entity to review and approve the proposal**
- **Attempt to perform sampling in 2028 and report emissions in 2029**
- **If a reasonable approach is not acceptable, requesting relief from CARB's Board may be required**

***CAA Non-Attainment Fees
SCAQMD Rule 317.1***



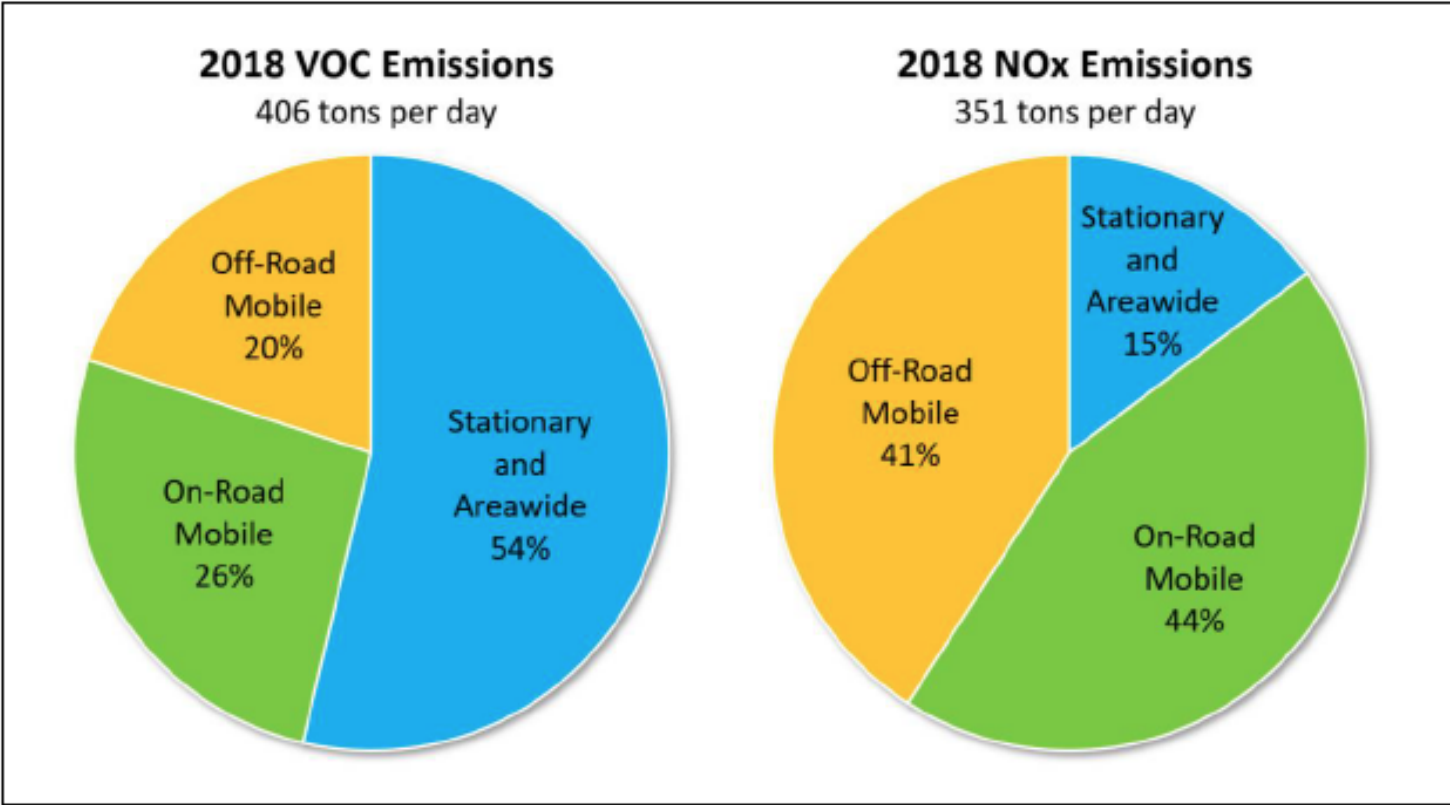
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SCAQMD Rule 317.1 – Title V Facility Penalties

- Implements Section 185 of the Clean Air Act for the 1997 and 2008 Ozone Standards
- Penalties will be imposed for the 2025 calendar year
- Clean Water SoCal members will pay ~\$800k per year
- A future public process will be held to discuss spending of the penalty funds

Emissions Sources of Ozone

Source Contributions for Ozone Precursors



Rule 317.1 - Fee Assessment

$$\left[\text{Actual Annual Tons of VOC Emitted} - \left(0.8 \times \text{Baseline Annual Tons of VOC Emitted} \right) \right] \times \text{Annual US EPA CAA §185 Fee Rate} = \text{Annual CAA Nonattainment Fee for VOC}$$

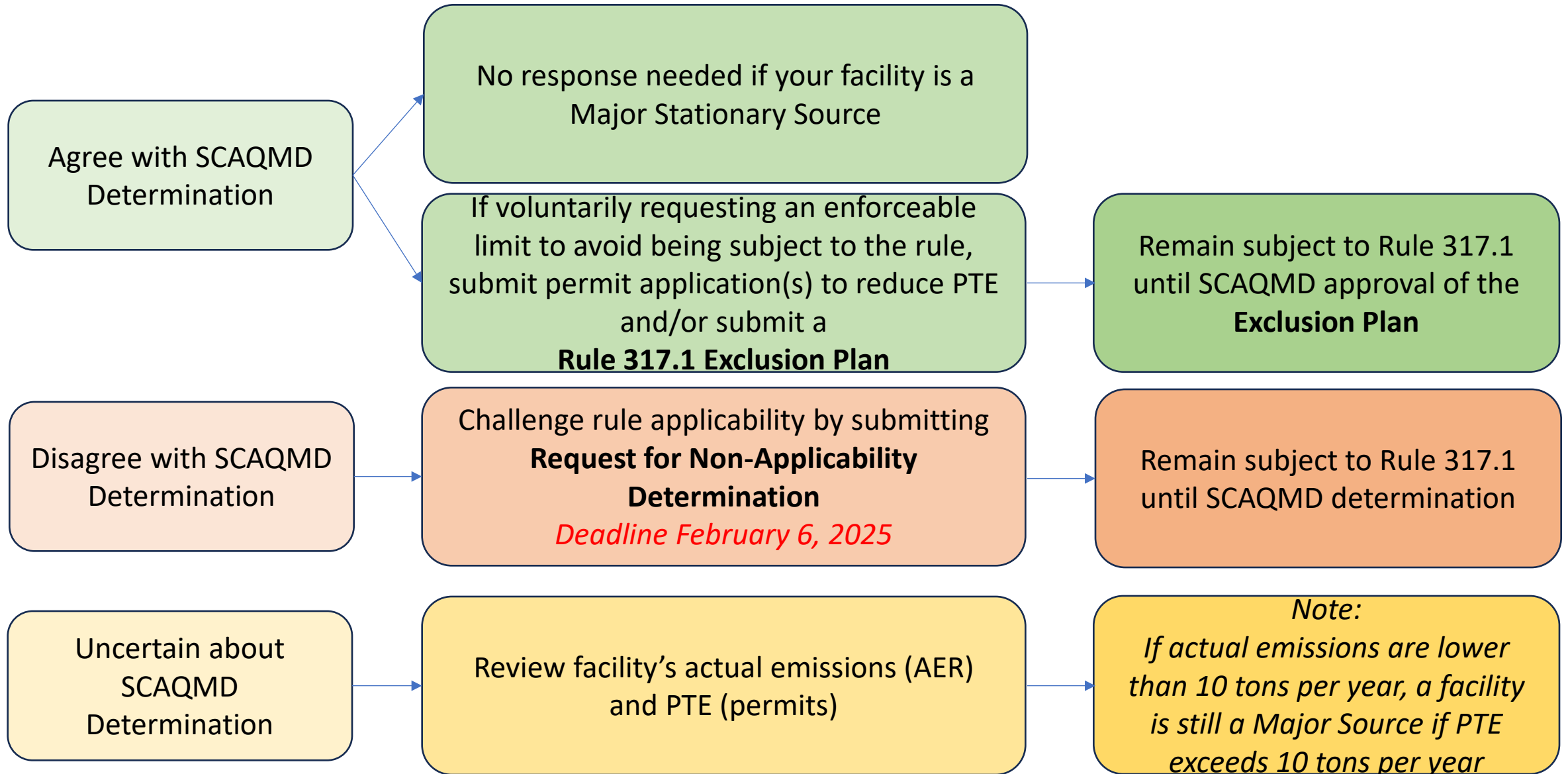
Sample Facility Calculation for VOCs:

- 2025 Actual Annual Tons of VOCs = 13
- 2024 Baseline Annual Tons of VOCs = 15
- 2025 Annual US EPA CAA §185 Fee Rate = \$12,476.67

$$\text{Annual CAA Nonattainment Fee for VOC} = [13 - (0.8 \times 15)] \times \$12,476.67 = \$12,476.67$$

- Follow the same procedure, using Nox emissions, to calculate annual CAA nonattainment fee for NOx.
- Add VOC and NOx nonattainment fees for total fee assessment

Rule Implementation – Notice of Applicability



CARB Mobile Source Regulations



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CARB Advanced Clean Fleet Regulations

State and Local Government Fleets:

- Applies to vehicles >8,500 lbs (medium- and heavy-duty)
- 50% of vehicle purchases must be ZEV starting on January 1, 2024
- 100% of vehicle purchases must be ZEV starting on January 1, 2027
- Plug in hybrids (NZEV) count as ZEV until 2035 – **Not RNG/CNG vehicles**
- Requirement to hire compliant fleets
- There are a number of exemptions which require applications to be submitted and approved



CARB Advanced Clean Fleet Regulations

AB 1594 Update

- Many exemptions and extensions require vehicles to be 13 years old.
 - [AB 1594](#) legislation adopted in 2023, Authorizes public agencies to “...purchase traditional replacements for medium- and heavy-duty vehicles at the end of their useful life...when needed to maintain reliable service and respond to major foreseeable events...without regard to the model year of the vehicle being replaced.”
 - March 2024 - CARB re-opened ACF regulations to incorporate AB 1594 requirements
 - March 2025 - CARB staff postponed revised regulatory package to address public agency feedback related to vehicles used for emergency response
-
- CARB withdrew Waiver Request from EPA January 13th. No waiver means the ACF Environmental Analysis is not valid; however, CARB maintains the Advanced Clean Truck (ACT) Regulations will be sufficient to drive implementation of infrastructure.
 - Without a Waiver, CARB cannot enforce ACF Regulations on manufacturers – CARB maintains they have enforcement authority over State & Local Government Agency Fleets (i.e., purchasers).
 - Four lawsuits have been filed. Settlement discussions underway with CA Trucking Association regarding ACT Regulations. EPA is working to undo waivers for ACT, and reopening rulemaking.

CARB 2025 Mobile Source Strategy

The 2025 Mobile Source Strategy is being developed to describe an integrated approach for meeting California's clean air mandates by identifying the technology pathways and programmatic concepts needed for the numerous mobile source sectors into the future.

March 2025 - CARB is pausing development of the Mobile Source Strategy and reconsidering the approach. The recent staffing cuts, and because there are several areas of work on transportation already CARB is exploring approaches to avoid duplicative work.



Emergency Diesel Generators



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Emergency Diesel Generators

- **Emergency, Stationary I.C. Engines**

- September 2022, SCAQMD established Tier 4 Final emission standards as BACT/LAER for Stationary Emergency I.C. Engine-Compression Ignition ≥ 1000 BHP located at Major Polluting Facilities
- Compliance with SCAQMD BACT/LAER can be achieved through multiple options:

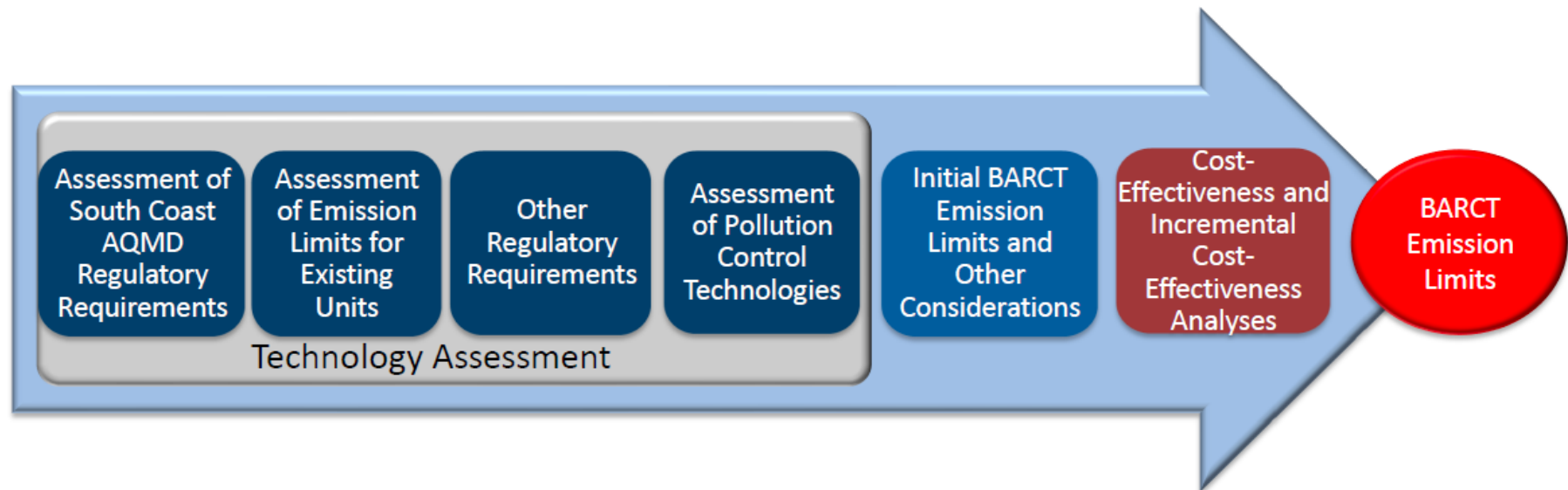
Installing
Tier 4 Final
Certified I.C.
Engines

Installing
Tier 4 Compliant
Certified I.C.
Engines

Retrofitting
U.S. EPA Certified I.C.
Engines, Non-Tier 4F,
to meet Tier 4F
emission limits

SCAQMD Proposed Rule 1110.4 Emissions from Emergency Generators

- **SCAQMD is conducting a Best Available Retrofit Control Technology (BARCT) Assessment**
 - BARCT defined in the CA Health and Safety Code Section 40406
“...an emission limitation that is based on the max degree of reduction achievable, taking into account environmental, energy, and economic impacts by each class or category of source.”



Questions?



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Questions?



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March 26, 2025**



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CARB's Air Toxics Regulations

January 1, 2022 - CARB's Updated AB 2588 Air Toxics Regulations Effective

- Expanded list of toxics to > 1700 compounds
- Many have unknown emission factors, toxicities and no testing methods

CASA Negotiated Phased Compliance, allowing WWTPs to:

- Report business as usual through 2028 (begin updated reporting in 2029)
- Perform a “two-step process” for determining shortlist of compounds

Wastewater Applicability

- 5 MGD, uncovered primary treatment
- 10 MGD, covered primary treatment

What is Required?

- Participation in a two-step process (whether as a statewide group or individually)

More Negotiations with CARB/Air Districts Required

Yorke Engineering retained as the CASA Project Manager

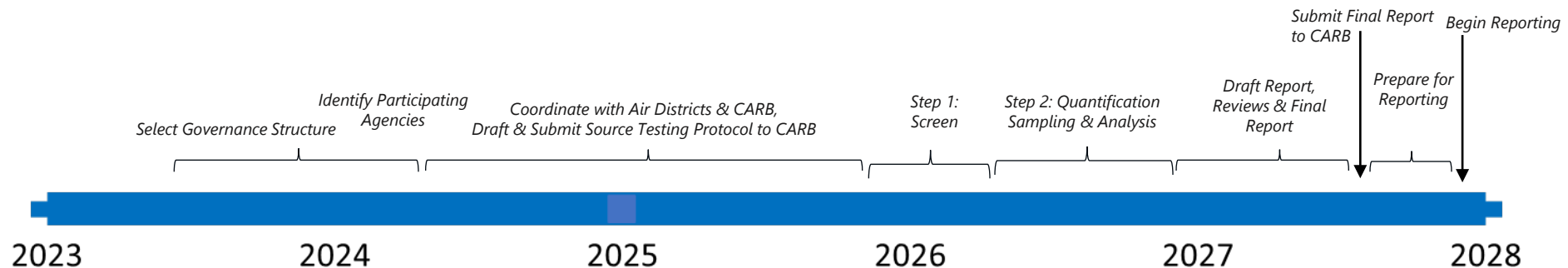
Statewide Pooled Emissions Study

Phase 1 (2024/2025)

- Develop an **emissions quantification plan (test protocol)** to perform CARB's Two-Step Process for testing.
- Get approval from CARB and Air Districts for the plan

Phase 2 (2026/2027)

- **Perform the Two-Step Process** with Source Test Specialists and in close collaboration with CARB, Air Districts, CASA's Steering Committee and participating WWTPs.
 - Step 1: Determine detectable compounds
 - Step 2: Perform sampling and analysis to quantify emissions of detectable compounds

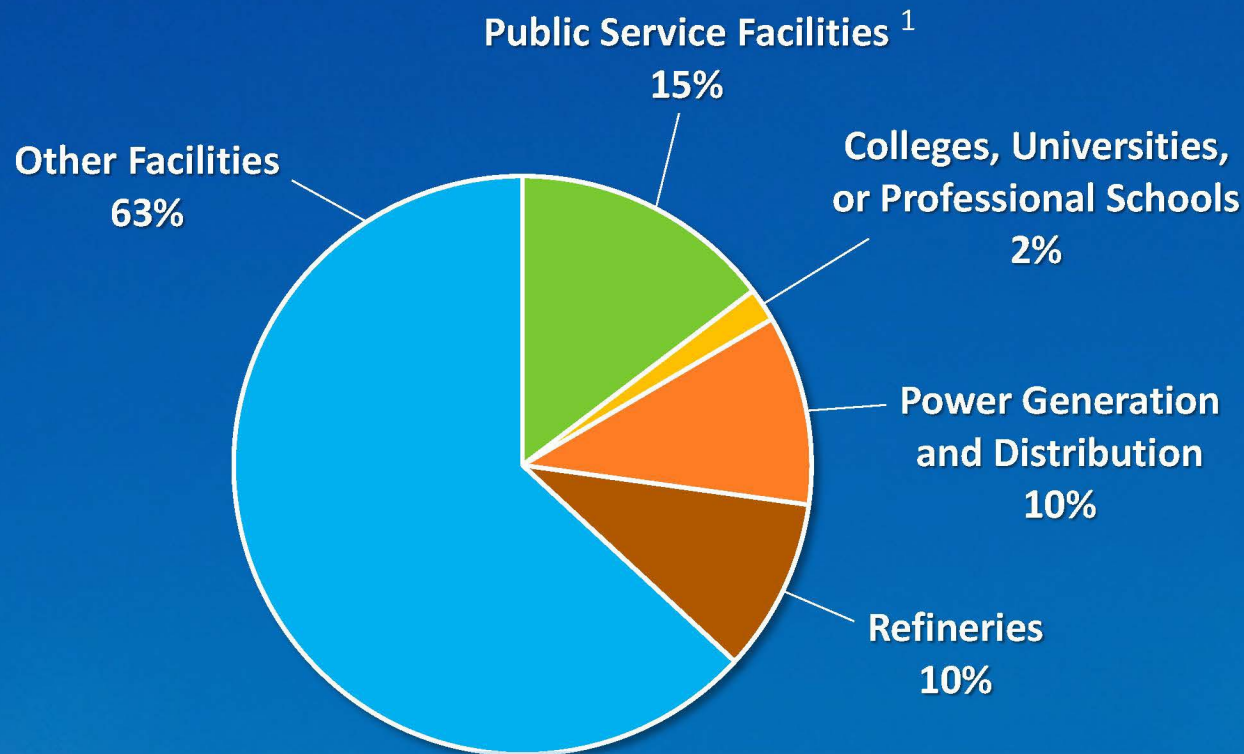




Projected Calendar Year 2025 Universe

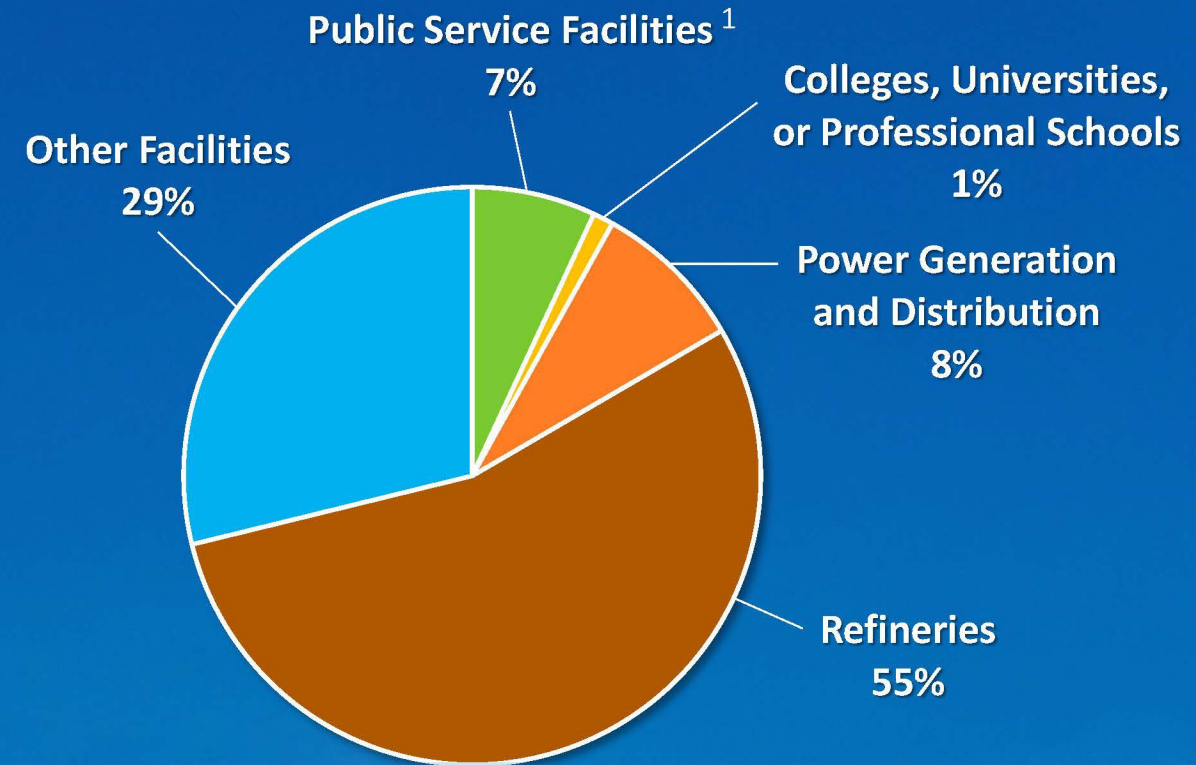
Major Source Facility Universe

≈320 Major Stationary Sources



CAA Nonattainment Fee Universe

Estimated Conservatively to be \$25 M in 2025



¹ – Public service facilities include general medical & surgical hospitals; sewage treatment; solid waste landfill; water supply & irrigation systems; natural gas distribution; regulation & administration of communications, electric, gas, & other utilities; and other general government support.