

# **AB 2588 “HOT SPOTS” EMISSION INVENTORY CRITERIA GUIDELINES REPORT UPDATE**

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# Presentation Overview

- ▶ What is the AB 2588 “Hots Spots” Program?
- ▶ Why are we revisiting the Program now?
- ▶ What’s been done so far?
- ▶ Who is subject to the Program?
- ▶ The Air Toxics Emissions Inventory Plan (ATEIP)
- ▶ The Air Toxics Emissions Inventory Report (ATEIR)
- ▶ CARB’s Proposed Updates to EICG Report (“Guidelines”)
- ▶ CAPCOA - Initial Concerns
- ▶ Help! Useful References

*EICG => Emission Inventory Criteria and Guidelines*

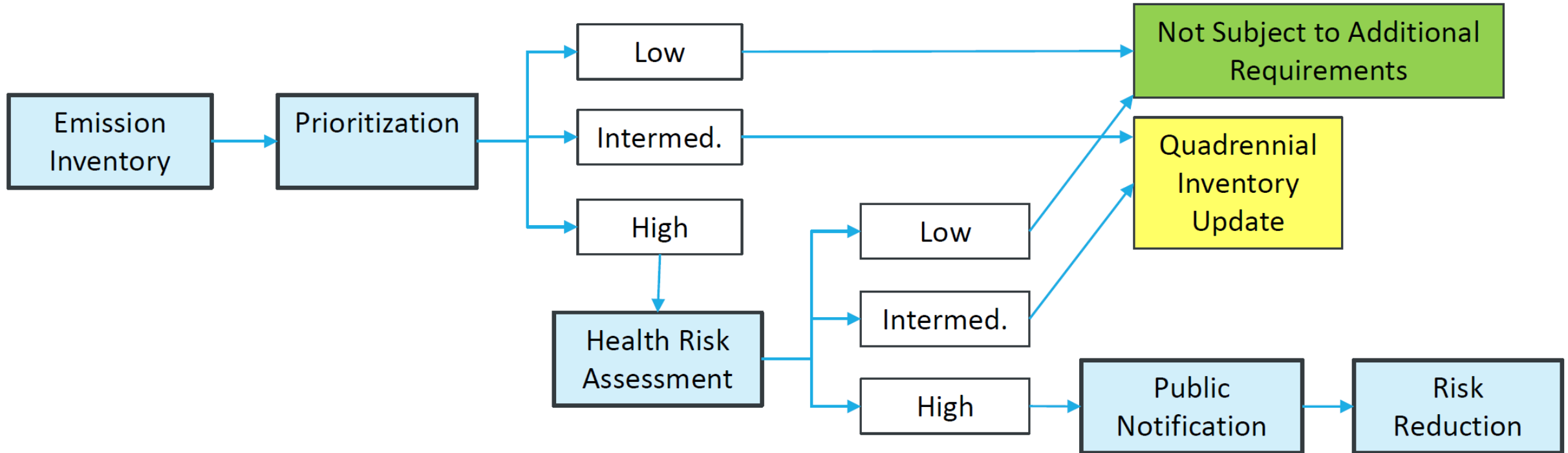
# What is the AB 2588 “Hots Spots” Program?

- ▶ Adopted in 1987 - Public right-to-know law
- ▶ Required detailed inventory of air toxics emissions, with prioritization, HRA, public notice (if necessary)
- ▶ Appendix A of Guidelines - Substances of Concern
- ▶ Routine and predictable operations of a facility
- ▶ Amended in 1992 (SB 1731) to require Risk Reduction
- ▶ A highly successful program

# The Four Basic Steps

- ▶ *Quantify* - Air Toxics Emissions (500+ compounds)
- ▶ *Assess* - Offsite Impacts of Emissions
- ▶ *Notify* - Neighbors if Emissions Pose Significant Risk
- ▶ *Reduce* - Risk to Less-than-Significant Level

# AB 2588 Process



# Why Revisit the Program now?

- ▶ OEHHA updated Risk Assessment Guidelines 2015
  - ▶ Responds to SB 25 - Children's Environmental Health Protection (1999)
- ▶ AERMOD Dispersion Model replaced ISC-ST3
- ▶ Revision to the CAPCOA Prioritization Guidelines
- ▶ Updates to Consolidated Table of Health Values
- ▶ Diesel Engines
- ▶ Have not addressed facility-wide toxic impacts since mid-1990's

# What's been done so far?

- ▶ OEHHA - The Air Toxics “Hot Spots” Program Guidance Manual for Preparation of Health Risk Assessments (March 2015)
- ▶ CARB - HARP 2 Update (2015)
- ▶ CARB/CAPCOA - Risk Management Guidelines (July 2015)
- ▶ CAPCOA Prioritization Protocol Update (August 2016)
- ▶ District Developed User Tools (e.g., screening tools, user guides)
- ▶ CAPCOA/CARB - IW Guidelines, Training, Emission Factor dBase

# Who is subject to the Program?

- ▶ Facility emits > 10 tpy TOG, PM, NO<sub>x</sub>, SO<sub>x</sub>
- ▶ Applies to existing, new, and modified facilities that emit Appendix A Substances
- ▶ Appendix E - Facilities < 10 tpy TOG, PM, NO<sub>x</sub>, SO<sub>x</sub>
  - ▶ “Industrywide” Facilities - District prepares the inventory, etc.
- ▶ Facilities identified as Posing Concern to Public Health (not in Appendix E)



# The AB-2588 Air Toxics “Hot Spots” Emission Inventory Criteria and Guidelines Regulation

- ▶ The original Guidelines Report - Adopted April 1989
- ▶ Amended numerous times. Last amendment in August 2007
- ▶ H&SC §93300.5. Incorporation by Reference. Requires subject facilities to comply with the Guidelines
- ▶ Amendments to the Guidelines require Board/OAL approval
- ▶ This is the Emission Inventory part of the AB 2588 process
- ▶ ATEIP - Air Toxics Emission Inventory Plan
- ▶ ATEIR - Air Toxics Emission Inventory Report
- ▶ Next Steps: Prioritization, HRA, Public Notification, RRAP

# The ATEIP (Plan)

- ▶ ATIEP = Air Toxics Emission Inventory Plan
- ▶ Details Matter! GIGO (Garbage In -> Garbage Out)
- ▶ Defines the methods used to calculate the toxic emissions
- ▶ Detailed device, process, and stack data
- ▶ Includes all assumptions (e.g., load factors, control efficiencies, etc.) and documentation for those assumptions
- ▶ Detailed process flow diagrams and aerial photo map required
- ▶ Emissions Basis - details on the estimation methods, source test methods or other measurement methods that will be used to determine the toxic emissions
- ▶ Allows for Pooled Source Testing for groups of related facilities

# The ATEIR (Report)

- ▶ ATEIR = Air Toxics Emissions Inventory Report
- ▶ Results of all sampling and source testing
- ▶ Facility diagram
- ▶ Emission calculations of facility air toxics data by device/process/stack
- ▶ Core Data Fields Form Information (Electronic data submittals accepted)
  - ▶ Facility, Stack, Device, Process
  - ▶ Emissions
- ▶ District-approved Alternative Submittal Formats are Allowed

# CARB's Proposed Updates - EICG Guidelines

- ▶ Appendix A - List of Substances. Possible addition of 400+ Substances
- ▶ Appendix C - Facility Guideline Index. Facility Lookup Table
- ▶ Appendix D - Source Testing. Requirements and alternatives
- ▶ Appendix E - Requirements for Smaller Facilities (< 10 tpy criteria pollutants)
  - ▶ De Minimis Usage Thresholds. Usage or activity-based levels (e.g., gallons of fuel or solvent used). Examples: print shops, wastewater treatment plants, crematories, boat and ship building/repair, ethylene oxide sterilizers, diesel engines
  - ▶ “Industrywide” Facilities
- ▶ Appendix F - Criteria for Screening HRAs

# CARB's Proposed Updates - Continued

- ▶ Appendix G - Updates to the Incorporated References (OEHHA Risk Guidelines, CAPCOA Prioritization)
- ▶ Section XI - Diesel Engine Reporting Requirements. Risk tables and modeling
- ▶ Other regulatory and technical updates to the main body of the Guidelines
- ▶ Timeline
  - ▶ Started 2018 - Current focus is Appendix A
  - ▶ Scientific Review Panel - Input on Appendix A changes - October 2019
  - ▶ Workshops expected in early 2020
  - ▶ CARB Board adoption expected November 2020

# CAPCOA - Initial Concerns

- ▶ Workload
- ▶ Training
- ▶ Tools
- ▶ Diesel E/S Engines
- ▶ Gasoline Stations
- ▶ Coordination with AB 617 Criteria Reporting - Appendix A and Appendix E

# HELP! Useful References

- ▶ AB 2588 - H&SC §44300-§44394: <https://ww3.arb.ca.gov/ab2588/general.htm>
- ▶ OEHHA - HRA Guidance Manual: <https://oehha.ca.gov/air/air-toxics-hot-spots>
- ▶ CARB - HARP 2: <https://ww3.arb.ca.gov/toxics/harp/harp.htm>
- ▶ CARB - Hot Spots Guidelines: <https://ww3.arb.ca.gov/ab2588/2588guid.htm>
- ▶ CARB/OEHHA - Health Values: <https://ww3.arb.ca.gov/toxics/healthval/healthval.htm>
- ▶ CAPCOA - Prioritization Guidelines: <http://www.capcoa.org/>
- ▶ CARB/CAPCOA - Risk Mgmt Guidelines: <https://ww3.arb.ca.gov/toxics/rma/rma.htm>
- ▶ CARB - Health Risk Assessments Training: Introductory and Intermediate Courses

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**Questions?**