

## **APCD Quick Reference Guide – October 2025**

This informational document intends to support project proponents and local planning staff's understanding of the air quality information, regulatory requirements, and air quality concerns relevant to evaluating new or modified development projects during the land use permitting process and related CEQA review. As an intergovernmental reviewing agency, the Santa Barbara County Air Pollution Control District's (APCD) goal is to ensure that air quality impacts are accurately identified, analyzed, and when necessary, adequately mitigated. The APCD may act as a Responsible Agency—if an APCD permit is required—or as a Commenting Agency—if no APCD permit is needed. For more information, visit the APCD's Land Use and CEQA webpage.

# Potentially Applicable Information Needs, Special Studies, Air Modeling, etc.

To assess the construction and operational air quality impacts of a proposed project and determine the significance of those impacts, the following information may be needed:

- ☐ **Equipment Description**: If the proposed project includes the installation or operation of any combustion equipment—such as large water heaters, boilers, and engines (e.g., emergency generators) used to power equipment, facilities, or operations—a description should be provided to local agency planning staff. The description should include:
  - Intended use (e.g., emergency backup or primary/continuous use) and what equipment or operations it will support,
  - Size or capacity (e.g., British Thermal Unit [BTU], horsepower [HP], or kilowatt [kW] rating),
  - **Fuel type** (e.g., diesel, natural gas, gasoline, propane, or other),
  - Make and model, and/or manufacturer specifications, if available.
- ☐ **Grading Quantities:** The project description should specify the total amount of earthwork required, including the volume of cut and fill (in cubic yards) and amount of soil imported or exported from the site.
- ☐ **Trip Generation Report/Traffic Study**: A trip generation report or traffic study should be provided for projects that will generate vehicle trips—especially heavy-duty truck trips. The report should identify the expected average daily trips, broken down by land use type and vehicle type.
- ☐ Air Quality and Greenhouse Gas Analysis: For large residential projects, mixed-use developments, and most commercial or industrial projects, the APCD recommends preparing an Air Quality and Greenhouse Gas Analysis (AQ/GHG Analysis). This report should summarize the project's anticipated AQ/GHG impacts during all phases of the project—including construction and operation. Among other potential impacts, the analysis should include quantified estimates of criteria pollutant and GHG (in units of carbon dioxide equivalent (CO₂e)) emissions from all potential sources, such as:
  - Mobile sources (e.g., vehicles)
  - Offroad Equipment (e.g., forklifts, cranes)
  - Area sources (e.g., architectural coatings, landscaping equipment, consumer products)
  - Permitted and unpermitted stationary combustion equipment (e.g., engines, process boilers)
  - Indirect GHG emissions from electricity and water use, and waste disposal

When submitting the report to the lead agency, include supporting documentation such as Excel spreadsheets, modeling reports, and electronic input files to allow for the review of calculation details. For full guidance on the scope and content of an AQ/GHG Analysis, refer to the APCD's <u>CEQA Handbook</u>.

Health Risk Assessment (HRA): If the project has the potential to emit toxic air contaminants (TACs) or hazardous air pollutants, or is located in close proximity to sensitive receptors, a Health Risk Assessment (HRA) should be conducted to evaluate the potential health risk from construction and/or operational activities. Depending on the nature of the project and sources of emissions, screening-level or refined air dispersion modeling may be necessary. HRA's should be conducted in accordance with the *District's Modeling Guidelines for Health Risk Assessments*, Form-15i. For general information, visit Air Toxics for Business. For project-specific guidance, contact the APCD directly. Important: If an APCD permit is required, the APCD will not issue a permit if an HRA shows that a significant impact will occur. Therefore, we strongly recommend that the HRA be performed upfront during the land use permitting process to ensure that the project will not result in a significant impact under the lead agency's health risk thresholds and that the project as proposed will be permissible by the APCD.

□ Air Quality Impact Assessment (AQIA): Projects that may cause or contribute to a violation of a federal or state ambient air quality standard (AAQS) should conduct an Air Quality Impact Assessment (using specialized air dispersion modeling) to determine whether emissions will violate any air quality standard or contribute substantially to an existing or projected violation. The AQIA should be performed pursuant to APCD Rule 805 and the <u>District's Modeling Guidelines for Air Quality Impact Assessments</u>. For more details, visit Air Quality Impact Assessment or contact the APCD directly for guidance. for guidance.

# **Permitting/Regulatory Advisories**

## **APCD Permit Requirements**

Prior to the construction, installation, or use of any equipment or operation that may cause air pollution—or is designed to control air pollution—the project owner or operator must obtain an **Authority to Construct (ATC)** permit from the APCD. Once the ATC permit is issued and the equipment is installed, a **Permit to Operate** (PTO) will be required for the ongoing operation of the regulated equipment. This follows a Source Compliance Demonstration Period, if applicable. The APCD permit process can take several months. To avoid delay, the applicant is encouraged to submit their ATC permit application as early as possible. To download permit applications and learn more, see <u>Permit Applications</u> and <u>APCD Permit Process Overview</u>.

Examples of operations and/or equipment subject to APCD permitting requirements, rules, and regulations are listed below; for a more detailed listing see APCD Permit Process Overview.

- Aerospace Operations (e.g., rocket and payload fueling and fuel storage)
- Asphalt/Concrete Batch Plants
- Boilers
- Cannabis Processing and Manufacturing
- Contaminated Soil/Water Cleanup Systems<sup>1</sup>
- Diesel Emergency Standby Generators and Firewater Pumps (≥ 50 bhp)
- Degreasing/Solvent Operations

District permits are required for all soil vapor extraction activities and for the excavation ("dig-and-haul") of more than 1,000 cubic yards of contaminated soil. Excavation projects less than or equal to 1,000 cubic yards require a written permit exemption.

- Emission Control Equipment
- Flares/Thermal Oxidizers
- Fume Hoods
- Gasoline Storage and Dispensing Equipment
- Internal Combustion Engines All Fuels (≥ 50 bhp)<sup>2</sup>
- Marine Vessels Associated with a Stationary Source
- Oil/Gas Production & Process Equipment
- Paint Spray Booths or Paint/Coating Spray Equipment
- Portable/Temporary Diesel Engines (≥ 50 bhp)<sup>3</sup>
- Sand & Gravel Operations/Rock Crushing & Screening Equipment
- Wineries and Breweries

#### **New Source Review (NSR) Permitting Program**

All new or modified stationary sources of air pollution are subject to the APCD's New Source Review (NSR) permitting program. NSR requirements may include: Best Available Control Technology (BACT), Air Quality Impact Analysis (AQIA), Health Risk Assessment (HRA), and Emission Offsets. These requirements are triggered based on emissions thresholds. As part of the ATC application review, the APCD will evaluate the project emissions to determine which NSR requirements apply. NSR is an important tool to help the APCD attain and maintain all State and Federal ambient air quality standards, while still allowing for new businesses to open and existing businesses to expand.

## Coordination with the CEQA Lead Agency and/or Land Use Agency

For projects that require a District permit, prior to the land use agency's issuance of a building/grading permit, proof of receipt of the required APCD ATC permit should be submitted by the applicant to County/City planning staff. Please note that the APCD cannot deem an application complete until the lead agency's permit application has been deemed complete. Additionally, the APCD cannot issue its permit until the lead agency has approved the project and finalized their CEQA determination. The project description provided in the APCD permit application must be consistent with the land use permit, and the APCD permit will include any emissions limits specified in the land use approval, as the APCD cannot permit a level of activity or emissions different than what has been approved and evaluated by the lead agency (and/or the land use authority).

#### **Asbestos Notification for Demolition/Renovation Activities**

To limit asbestos emissions into the air, the APCD enforces federal regulations that govern demolition and renovation activities in institutional, commercial, industrial, and certain residential buildings. These rules do not apply to private homes or apartment buildings with fewer than five units under one roof.

Before beginning work on a regulated structure, an asbestos survey must be conducted for the areas involved. Depending on the results, you must submit either:

<sup>&</sup>lt;sup>2</sup> Depending on fuel type and proposed usage, different permit requirements apply. See <u>Engineering Programs</u>.

<sup>&</sup>lt;sup>3</sup> All portable diesel-fired engines rated at 50 brake horsepower or greater must have either statewide Portable Equipment Registration Program (PERP) certificates or District permits. Generally, construction/portable engines with PERP certificates are exempt from District permit provided they will be on-site for less than 12 months. In some situations, portable and/or temporary engines, require a District permit irrespective of PERP-registration status. See <a href="PERP FAQ">PERP FAQ</a> regarding the operation of PERP-registered engines at stationary sources. The use of prime diesel engines to supply power to special event facilities may require a District permit. Contact the District directly as needed.

- an Asbestos Demolition/Renovation Notification (APCD Form ENF-28), or
- an Exemption from Notification for Renovation and Demolition APCD Form <u>ENF-28e</u>), also available at <u>Compliance Forms</u>.

**Demolition activities always require District notification**, even if the asbestos survey finds no asbestoscontaining materials (ACM). Submit (in person, by mail, or by email) the completed form (notification or exemption) to the APCD **at least 10 working days before** disturbing any asbestos or beginning demolition. To determine whether your project requires notification or qualifies for an exemption, see <u>Asbestos</u>.

Note for Residential Projects: Although advance notification is not required for demolishing or renovating single-family homes or residential buildings with fewer than five units under one roof, it is still advised to determine if friable asbestos (or materials that could become friable during demolition or disposal) is present and if so, properly handle such material.

## **Prohibitory Rules**

Projects are advised to review the APCD's prohibitory rules (*Regulation III*) at <u>Current Rules and Regulations</u> to determine applicability of proposed equipment or operations and to ensure compliance.

## **Recommended Best Practices to Address Air Quality Concerns**

## Land Use Compatibility and Impacts to Sensitive Receptors

Some land uses generate emissions (i.e. odors, dust, toxic air contaminants) that have the potential to cause nuisance issues and health impacts. Examples of activities that could present compatibility issues include but are not limited to gas stations, heavy truck travel, and equipment that emits diesel or other toxic air contaminants. The California Air Resources Board (CARB)'s <u>Air Quality and Land Use Handbook</u> includes recommendations and siting criteria for land development projects and encourages land use agencies to use their planning processes to ensure the appropriate buffer distance between facilities emitting air pollutants of concern and sensitive land uses, such as residential units, childcare facilities, schools, and hospitals. Where possible, CARB recommends a minimum separation distance between sensitive land uses and sources of air pollution. Project proponents and land use agencies should carefully evaluate the compatibility of the project with surrounding land uses and include the appropriate separation distance from existing uses in the project's design to minimize potential nuisance issues and public exposure to air pollutant emissions. In situations where the siting of new development may present compatibility issues and public health concerns, alternative land uses that do not lead to the long-term exposure of sensitive receptors to air pollutants should be considered.

The District maintains a <u>Permitted Facilities Map</u> that identifies the location of all of the facilities permitted and regulated by the District. The map is a tool that can be utilized by land use agencies and the general public to obtain information about the location, types, and emissions from regulated sources of air pollution. A variety of information is available for download including active District permits, annual reports of usage and operational data, compliance history, emissions, inspections, and notices of violation. We encourage land use staff and the general public to become familiar with existing, proximate sources of air pollution when evaluating new land use developments, particularly land uses that will introduce sensitive receptors to a site (e.g. residential, childcare facilities, schools, senior living communities).

#### **Proximity to Highway 101**

Projects proposed within 500 feet of Highway 101, should review "Guidance for Development near Busy Roadways in Santa Barbara County." In addition, California housing bill, Assembly Bill (AB) 130 (2025), exempts certain housing development projects from CEQA if the housing development project meets various conditions. One of these conditions is the requirement for housing on sites located within 500 feet of a freeway to apply various project design features to reduce exposure to freeway-related air pollutants. The applicant land use agency is advised to review and consider the requirements of AB 130 in its design and evaluation of new housing development projects.

#### **Dust Control Measures**

To reduce the potential for violations of APCD Rule 345 (Control of Fugitive Dust from Construction and Demolition Activities), Rule 302 (Visible Emissions), and Rule 303 (Nuisance), standard dust mitigations (Attachment A) are recommended for all construction and/or grading activities.

#### **Diesel Exhaust Control Measures**

The State of California considers particulate matter emitted by diesel engines carcinogenic. Therefore, to minimize public exposure to air pollution, construction contracts should specify that contractors adhere to the requirements listed in <a href="Attachment B">Attachment B</a> during project grading, construction, and hauling in order to reduce emissions of particulate matter (as well as of ozone precursors) from diesel equipment. Measures to reduce operational-related emissions can be found in <a href="Attachment C">Attachment C</a>. Recommended measures should be implemented to the maximum extent feasible. In addition, for warehouse/logistic facility projects, we recommend that the project proponent and land use agency review the following resources:

- California Air Resources Board (CARB) <u>comment letters for freight facilities</u> including recommended air pollution emission reduction measures for warehouses and distribution centers.
- State of California Department of Justice, <u>Warehouse Projects: Best Practices and Mitigation</u>
  Measures to Comply with the California Environmental Quality Act.

#### **GHG Reduction Measures**

Prior to project occupancy, any feasible greenhouse gas (GHG) reduction measures from the following sector-based list should be applied:

- Energy use (energy efficiency, low carbon fuels, high efficiency process equipment, and onsite renewable energy)
- Water conservation (improved practices and equipment, landscaping)
- Waste reduction (material re-use/recycling, composting, waste diversion/minimization)
- Architectural features (green building practices, cool roofs)
- Transportation (reduce vehicle miles traveled; utilization of vehicle fleets with the cleanest possible vehicles, including alternatively fueled vehicles; compact and transit-oriented development; pedestrian- and bicycle-friendly project design and features such as sidewalks and bike racks; employee commute trip reduction programs, such as ride-sharing programs and alternative transportation options, e.g. public transit, local shuttles, park-and-ride lots, etc.)
- Electric Vehicle Infrastructure (EV charger installation, pre-wiring for future EV chargers)
- See the California Association of Air Pollution Control Officer's (CAPCOA) <u>Handbook for Analyzing</u>
   Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and
   Equity for GHG reduction measures and quantification.