

ARB's Air Toxics "Hot Spots" Program (AB 2588)

- ARB's overall strategy
- Describe "Hot Spots" program
- Proposed regulatory changes
- Coordinate "Hot Spots" with the ATCM

What is ARB's Strategy?

- ATCM is designed to reduce diesel PM across the entire State
- Most facilities will comply with "Hot Spots" by complying with the ATCM
- A small number of facilities will need additional risk reductions beyond the ATCM

ARB's "Hot Spots" Program

- Requires facilities to report emissions
- Requires high-priority facilities to evaluate health risks from air toxics
- High-risk facilities must notify public of health risks
- Facilities must reduce health risks

Proposed Changes to the Regulation

- Replace 3,000 gallon threshold for diesel engines with the ATCM emission thresholds
- Coordinate "Hot Spots" and ATCM schedules
- Require facilities to show how their total facility risk can be reduced by the ATCM compliance date

Replace 3,000 Gallon Diesel Fuel Threshold

- Less than 15 hours total for all engines complies with “Hot Spots”
- More than 15 hours for all engines requires the facility to report emissions under the “Hot Spots” program if the Sum of (Hours x EF) is greater than 16 g/bhp-yr

Example of Emissions Calculation

Facility with 3 engines requiring 42 hours per year for maintenance and testing

$$(20 \text{ h/y} \times 0.45 \text{ g/bhp-hr}) = 9 \text{ g/bhp-yr}$$

$$(12 \text{ h/y} \times 0.25 \text{ g/bhp-hr}) = 3 \text{ g/bhp-yr}$$

$$(10 \text{ h/y} \times 0.20 \text{ g/bhp-hr}) = 2 \text{ g/bhp-yr}$$

$$14 \text{ g/bhp-yr}$$

No additional requirements if Total < 16 g/bhp-yr

“Hot Spots” Public Notification

- ATCM public process will fulfill the “Hot Spots” Public Notification requirements in most cases
- If a facility cannot show how their risk can be reduced by the ATCM compliance date, the facility may have to conduct a “Hot Spots” public notification

Options for Engine Owners

- Most facilities will be below the “Hot Spots” reporting threshold by complying with the ATCM
- Multiple Engine Facilities with residual risk may be classified as “Industrywide”
 - Drastically reduced State fees
 - Industrywide Public Notification

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