

Public Workshop to Discuss Amendments to the AB 2588  
“Hot Spots” Emission Inventory Criteria and Guidelines  
Regulation

California Air Resources Board  
March 28 and April 3, 2006

1

## Workshop Objectives

- Discuss proposed amendments to the AB 2588 Air Toxics “Hot Spots” Emission Inventory Criteria and Guidelines Regulation
- Describe how the proposed amendments will align “Hot Spots” program requirements with the Air Toxic Control Measure (ATCM) for stationary diesel engines
- Obtain public comment

2

## Presentation Outline

- Stationary Diesel Engine ATCM and Air Toxics “Hot Spots” Program
- Proposed Amendments to the “Hot Spots” Regulation
- Facility Scenarios
- Next Steps

3

## Stationary Diesel Engine ATCM and Air Toxics “Hot Spots” Program

4

## Harmonizing Two Programs with Similar Goals

- Objective of both programs is to reduce health risks from stationary diesel engines
- Update and align requirements to eliminate duplicative requirements
- Streamline process to make data collection more efficient

5

## Air Toxics “Hot Spots” Information and Assessment Act

- Purpose – to inform and protect California public from exposures to toxic air pollutants
- AB 2588 enacted in 1987
- Four key elements
  - Emission Inventory
  - Health Risk Assessment
  - Public Notification
  - Risk Reduction
- Program administered over last 15 years by Cal/EPA and local air districts

6

## Stationary Diesel Engine ATCM

- ATCM adopted by ARB in 2004
- Applicable to prime and back-up engines
- ATCM requires:
  - Emissions inventory data - July 2005
  - Compliance with performance standards (BACT) beginning in 2006
- Compliance with the emission standards and operating requirements of ATCM will, for most engines, bring risk to < 10/million

7

## Comparison of ATCM and “Hot Spots” Requirements

- “Hot Spots” is risk-based
  - No emission limits unless facility poses significant risk to nearby receptors
  - Public notification and risk reductions can be required if risk is significant
- Stationary Diesel Engine ATCM is emissions-based
  - Requires emissions inventory reporting and emission reductions
  - Implementation began in 2005 and will result in risk reductions from diesel engines

8

## How Are the Two Programs Being Harmonized?

- The ATCM engine information may be used to comply with “Hot Spots” inventory requirements
- Screening risk assessment tables provided for initial risk evaluation
- Allows “Hot Spots” risk assessments to reflect most current facility emissions
  - Most facilities with only one diesel engine will comply with “Hot Spots”
  - Multiple diesel engines at a facility may individually comply with ATCM, but facility risk may still be significant

9

## Proposed Amendments to the “Hot Spots” Regulation

10

## Amendment Goals

- No changes proposed for non-diesel sources
- Establish diesel engine reporting requirements that will
  - Align Guidelines Regulation with ATCM
  - Avoid duplicative requirements
  - Ensure diesel PM risk reduced
- Incorporate OEHHA risk assessment guidelines and new health values, as required by statute

11

## Proposed Amendments

- Modify reporting threshold for diesel engines
- Define “diesel engine-only facility”
- Align inventory reporting to avoid duplication
- Allow flexibility in selecting reporting year
- Provide screening risk assessment tools
- Address public notification process
- Limit State fees

12

## Modify Reporting Threshold for Diesel Engines

- **Propose to modify diesel engine reporting threshold to 20 hrs/yr**
  - Current 3,000 gallon/yr reporting threshold does not reflect potency of diesel PM
  - 20 hrs/yr threshold is similar to ATCM
  - District has discretion to lower reporting threshold
  - Exempts many facilities that are already complying with ATCM

13

## Define “Diesel Engine-Only Facility”

- **Propose to incorporate concept of “diesel engine-only facility”**
  - Covers facilities with diesel engines and no other significant source of toxic emissions
  - District estimates emissions and conducts screening risk assessment for facility
  - Provision applied at district discretion
  - Comparable to industrywide classification and limits State fee (~\$35)

14

## Align Inventory Reporting with ATCM

- **Propose to allow ATCM inventory to be used to meet “Hot Spots” inventory requirements**
  - Diesel engine information submitted pursuant to the ATCM can satisfy emission inventory plan and report requirements
  - Eliminates duplicative reporting requirements
  - Provides information more quickly
  - Lower costs for lower-risk facilities

15

## Provide Flexibility in Selecting Reporting Year

- **Propose to allow flexibility in choosing reporting year (2005-2007)**
  - Districts may use 2005 diesel emissions for determining “Hot Spots” applicability
  - At district discretion, facilities may submit more recent emission information
  - Incentive for early compliance with ATCM

16

## Provide Screening Risk Assessment Tools

- **Propose tools for performing screening risk assessments**
  - Standardized screening process
  - Same risk assessment methodology as in ATCM staff report
  - Screening tools available on Internet
  - District may accept more detailed information

Hours	EF = 0.40 g/bhp-hr							
	Downwind Distance (m)							
	30	40	50	70	100	200	300	400
10	4	4	4	4	4	2	1	1
20	8	8	8	8	8	4	2	1
30	12	12	12	12	12	6	3	2
40	16	16	16	16	16	8	4	3
50	20	20	20	20	20	10	5	3

17

## Address Public Notification Process

- **Confirm district authority to conduct grouped public notification**
  - Diesel engine location and emissions information will be available to the public
  - Districts have option to conduct public notification on multiple facilities via newspaper or Internet
  - Grouped public notification allows districts to circulate information quickly
  - No change for non-diesel sources

18

## Use Industrywide Rate for State Fees

- **Propose to limit State fees for “diesel engine-only facilities” to \$35**
- Streamlining reduces workload and the need to charge higher State fees
  - Same as \$35 fee rate used for Industrywide facilities
  - Does not limit local air district authority to assess district fees

19

## How Will Facilities be Affected by the Proposed Amendments?

- Most facilities with a single backup engine will be exempt from “Hot Spots” by complying with ATCM
- Facilities with multiple engines may have to conduct varying levels of health risk assessments
- A small number of facilities may have to conduct public notification to fulfill “Hot Spots” requirements
- A few facilities may need to go beyond the ATCM to meet “Hot Spots” risk reduction requirements

20

## Facility Scenarios

21

## Example Facility Scenarios

1. Facility with one emergency backup diesel engine
2. Facility with 3 emergency backup diesel engines
3. Facility with diesel engines already in “Hot Spots” program

22

### Scenario #1 - Facility with one emergency backup diesel engine

- Engine hours for maintenance and testing reduced to 20 hrs/yr or less by 2006 to comply with ATCM
- Facility is exempt from “Hot Spots” (unless other toxics are located at the facility)
- Facility pays \$0 to ARB, but may be required to pay district fee

23

### Scenario #2 - Facility with 3 emergency backup diesel engines

- Engine hours reduced below 20 hrs/yr for each backup engine
- Facility submits ATCM engine inventory data to district
- District determines potential risk is significant using screening risk assessment tables
- Facility uses HARP software to calculate a risk of 5/million
- Facility pays State fee of \$35/yr, in addition to their district fee, and complies with “Hot Spots”

24

## Scenario #3 - Facility with diesel engines already in "Hot Spots" program

- Facility reduces engine hours to max extent possible
- District determines potential risk is significant
- Facility updates existing health risk assessment using HARP software – risk is 27/million
- Facility conducts public notification
- Facility must control highest emitting engine(s) within 5-10 years to get their overall risk below district level of significance
- Facility pays State fee of \$3,300/yr until risk is <10/million, then \$100/yr until risk is < 1/million

25

## Next Steps

- Revise proposal based on input at public workshops
- Schedule additional public workshops if needed and make revised proposal available
  - via the web <http://www.arb.ca.gov/ab2588/2588guid.htm>
  - sent to email ab2588 listserve
- ARB Board consideration tentatively scheduled for mid-2006

26

## Contact Information

- Dale Shimp, Manager
- Environmental Justice Section
- 916-324-7156 [dshimp@arb.ca.gov](mailto:dshimp@arb.ca.gov)
  
- Chris Halm
- Environmental Justice Section
- 916-323-4865 [chalm@arb.ca.gov](mailto:chalm@arb.ca.gov)
- <http://www.arb.ca.gov/ab2588/ab2588.htm>



27

28

29