CAPCOA
Engineering Managers and TARMAC Committees Meeting
October 30-31, 2018

AB 617 Reporting Regulation
Integrated Emissions Data is a Foundation of CARB’s Programs

- Understand sources of different air pollutants
- Support and track progress of state and federal programs
- Harmonize data submittal requirements, methods, deadlines, frequency
- Provide enhanced transparency and public right-to-know under AB 197 and AB 617 requirements
- Modernize and integrate data management processes
  - Improve access in user-friendly forms such as maps
Integrated Emissions Data is a Foundation of CARB’s Programs (cont’d)

- Advance inventory to meet today’s needs:
  - Comprehensive, complete
  - Comparability, consistency
  - Up-to-date
- Allow for evaluation of local impacts/cumulative exposure
- Support CARB mapping tool
AB 617 Overview

Statewide requirements

- Accelerated retrofit of pollution controls on industrial facilities
- Increased penalty provisions
- Specified stationary source emissions reporting requirements

Community focused framework

- Community emissions reduction programs
- Community-level air quality monitoring
- Grants to local community groups
AB 617 Emissions Reporting Statute

- Statute requires annual criteria and toxics emissions data reporting for specified stationary sources
- Requires uniform, statewide reporting system
- Statute allows for 3rd party verification
- Establishes applicability criteria for certain facilities that must report statewide
**AB 617 Reporting Regulation**

- Develop initial statewide regulation now, with ongoing updates planned
- Over time - improve method consistency, data consistency, and data accessibility

<table>
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<th><strong>Initial Regulation</strong></th>
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<tr>
<td>• Establish applicability – facilities subject to reporting</td>
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<td>• Require annual reporting of criteria and toxics emissions using existing methods</td>
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<td>• Provide data reporting requirements for sources</td>
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Visits with all 35 districts (Jan. – Jun. 2018), meetings with stakeholder groups

CAPCOA working group conference calls

Five initial public workshops in May/June, to discuss concepts; five more workshops in July/August to discuss draft regulatory text
Workshop Comment Letters Received

• The full comments are available here: https://www.arb.ca.gov/ei/ctr/ctr-regulation/ctr-regulation-comments.htm

• Comments were provided on the following topics:

  • Implementation
  • Standardization
  • Dates & Timing
  • Applicability
  • Toxics Elevated Prioritization

  • Community Inventory
  • Reporting System
  • Emissions Reported
  • Verification
  • Data Access
• Establishes applicability criteria
  • Facilities subject to GHG reporting under MRR
  • Facilities authorized by an air district permit to emit 250 or more tons of a nonattainment criteria pollutant
  • Facilities that receive an “elevated prioritization score” from district per the AB 2588 Hot Spots Program (for now, facilities identified by districts as “high priority”)
  • All facilities with district permits within the communities selected for monitoring or emissions reduction programs under AB 617
Proposed Regulation - Overview

• Provides criteria and process for cessation of reporting for facilities that no longer meet the applicability criteria
• Definitions of all key terms
• Establishes first year of required reporting for facilities that meet the applicability criteria
• Facilities to provide emissions or throughput data (for previous calendar year) to districts by May 1
• Districts to provide emissions data to CARB by Aug. 1
• All applicable facilities report criteria pollutants and toxics annually
• List of toxics is Appendix A-1 from AB 2588 reporting guidelines; prior to 2020, may report according to current district toxics lists
Proposed Regulation – Additional Data

• Defines data that must be reported: location, responsible party, stack/release locations and heights, etc., emissions at device and process level (if feasible)

• Use existing district-approved quantification methods until standardized methods are developed and established in a future revision of the regulation

• Report from facility requires attestation that data are correct and complete, to the best of reporter’s knowledge
Proposed Regulation – Enforcement and Data Collection

• If report is missing/incorrect on Aug. 1, CARB will consult district, then request data directly from facility

• CARB or district may enforce upon late or falsified reports (coordinate with district to avoid duplicate enforcement)

• New database under development, will have an option for facility to report to reporting tool
  
  • Must have district approval to utilize direct portal; district will have primary access to data
Electronic Data Reporting Conceptual Diagram

- Potential data flow for proposed CARB electronic data system
- Allows for data submission via district, or submission to air district
Subarticle 2 is a placeholder section in regulation
In the future, it will include approved uniform methods for use by facility operators statewide
Methods will be developed in coordination with industry, air districts, CAPCOA, and others
Uniform methods and other revisions will be incorporated through formal rulemaking process
• 10 communities selected by Board, based on staff recommendation
• Will work with districts that have “Year-1” communities to establish and notify facilities that must report
• Communities have between 30-200 permitted facilities, except South Coast; SC = ~500 for each community
Next Steps

• Review public comments received on draft regulation and staff report
• Staff presentation to Board at December 13-14 Board Meeting (Fresno, CA)
  • Comments due December 10
• Public testimony/comments at Board Meeting
• Board adopts regulation or directs staff to make changes
• If revisions are made, 15-day comment period on revised draft
• Submit comments to: ctr-report@arb.ca.gov
Contact Us – Reporting Regulation

Criteria Pollutant and Air Toxics Reporting

• Website:
  • https://www.arb.ca.gov/ei/ctr/ctr-regulation/ctr-regulation.htm

• Email
  • ctr-report@arb.ca.gov

• Click “Subscribe” for Criteria & Toxics Reporting Regulation listserve registration
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