

SCAQMD and RECLAIM:

A discussion on regulations and compliance

September 14, 2012

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Overview

- Introductions
- South Coast Air Quality Management District (“SCAQMD”) RECLAIM Program
- SCAQMD Inspections and Audits
- Compliance Issues
- Regulatory Updates/Compliance Advisories
- Questions/Discussion

SCAQMD RECLAIM Program

- Regional Clean Air Incentives Market
 - Established in 1994 (Regulation XX)
 - Facilities with >4 tpy NOx and/or SOx in any year since 1990
 - Replaces “command and control” compliance with a flexible alternatives to reduce emissions
 - Facilities evaluate installing controls vs. emissions credits
 - Facilities receive allocations
 - Yearly allotment – expire at end of reporting cycle
 - Reduced over time

SCAQMD RECLAIM Program cont.

- Created emissions trading system (NO_x/SO_x RTCs)
 - Two Reporting Cycles
 - Cycle 1: January – December
 - Cycle 2: July – June
 - Two Trading Zones
 - Zone 1: Coastal (Zone 1 RTCs)
 - Zone 2: Inland (Zone 1 or Zone 2 RTCs)
 - Must maintain sufficient RTCs equal to emissions on quarterly basis

RECLAIM Permits

- Permit Sections:
 - A – Facility Information
 - B – Allocation Information
 - C – Facility Plot Plan
 - D – Facility Description & Equipment Conditions
 - E – Administrative Conditions
 - F – RECLAIM Monitoring & Source Testing Req.
 - G – RECLAIM Recordkeeping & Reporting Req.
 - H – PTC and Temporary PTO
 - I – Compliance Plans & Schedule
 - J – Air Toxics
 - K – Title V Administration

RECLAIM Source Classes

Rule 2011 SO_x

- Major Sources
 - Listed under 2011(c)(1)
 - Required to have CEMS
 - SO_x > 10 tpy
- Process Units
 - Other devices required to have permit
- Rule 219 Exempt

Rule 2012 NO_x

- Major Sources
 - Listed under 2012(c)(1)
 - Required to have CEMS
 - SO_x > 10 tpy
- Large Sources
 - Listed under 2012(d)(1)
 - NO_x: 4tpy to 10 tpy
- Process Sources
 - Other Permitted Devices
- Rule 219 Exempt

RECLAIM Electronic Reporting Requirements

- CEMS Sources
 - Report NOx and/or SOx emissions daily by 5:00 pm following day
- Large Sources
 - Report NOx emissions on monthly basis by 15th of each month
- Process & Rule 219 equipment
 - Report NOx and/or SOx emissions within 30 days of 1st three quarters; within 60 days for 4th quarter

RECLAIM "Paper" Reporting Requirements

- Quarterly
 - Submit QCER within 30 days of end of qtr
 - 1st, 2nd, and 3rd quarters
- Annually
 - Submit APEP within 60 days of end of 4th qtr

Reporting Corrections

- Electronic
 - Can resubmit if within reporting period
 - If outside of reporting qtr:
 - Form CERE with revised QCER
- Paper
 - Simply resubmit if within reporting period
 - If outside reporting quarter:
 - Submit correction forms (QCE-1, NOx/SOx-1) and revised QCER
 - Include evidence that error beyond reasonable control
 - APEP cannot be corrected

SCAQMD Inspections and Audits

- RECLAIM CEMS Information Requests
 - Emissions calculations
 - Monthly
 - Daily
 - Hourly
 - RTU transmission records
 - Calibration Records
 - Cal gas certs
 - Data substitution (MDPs)
 - Availability Calculation
 - RATA tests
 - Maintenance Log Book
 - QAPs

SCAQMD Inspections and Audits

- General RECLAIM Information Requests
 - Emissions Calculation Spreadsheets or Forms
 - Gas Bills
 - Fuel Meter Readings
 - Calibration records
 - Timer Records
 - Source Tests
 - Rule 219 equipment records
 - Rental Equipment records

SCAQMD Inspections and Audits

- Non-RECLAIM Inspections and Audits
 - Non-RECLAIM CEMS
 - Rule 218/218.1
 - Rule 431.1
 - Federal
 - Process data
 - Throughput limits
 - Temperature limits
 - Material Usage
 - Rule or Other Permit Compliance Requirements

Compliance Issues

- RECLAIM CEMS Related
 - Missing/Late Daily RTU transmissions
 - Improper MDPs followed
 - DAHS emissions calculation programming
 - Maintain all sub-15 minute data for a minimum of 48 hours (However, if you still have it, it's fair game!)
 - RATAs
 - Bias Adjustment Factors (BAFs)
 - Set to 1.00 before testing
 - Update daily emissions calcs if BAF >1.00
 - back to test date

Compliance Issues

- RECLAIM CEMS Related continued...
 - Failure to follow QAP
 - Daily Calibration records
 - Calibration Gases
 - Cal gas certifications
 - Correct value recorded in DAHS
 - Maintenance log books
 - Modifications to CEMS
 - Refer to AQMD "TECHNICAL GUIDANCE DOCUMENT R-002" dated 08/26/1997

Compliance Issues

- RECLAIM Non-CEMS Related
 - Exceeding Annual Allocation
 - Late reports
 - Unsigned reports
 - Spreadsheet emissions calculation errors
 - Improper MDPs followed
 - Equipment records for fuel usage/operating hours
 - Failure to conduct required Source Testing & Tune-ups
 - Operating equipment without a permit
 - Maintenance/operation of equipment – 2004(f)(1)
 - Breakdown reporting
 - Rule 219/Rental Equipment

Compliance Issues

- Non-RECLAIM Related
 - Failure to post permits on or near equipment
 - Failure to comply with all permit conditions
 - Examples:
 - Recordkeeping
 - Material usage (i.e. VOC logs)
 - Operating equipment without a permit
 - Failure to post permits on or near equipment
 - Maintenance/operation of equipment – 203(b)
 - Public nuisances

Compliance Advisories/ Regulatory Updates

- 11/13/2009 – Clarification of mass emission rate calculation for major sources
 - Avg. all VALID concentration and stack flow data points separately that are collected within a 15 minute block, then calculate mass emission rate

Source:

http://www.aqmd.gov/reclaim/docs/COMPLIANCE_ADVISORY_CEMS_Mass_Ems_Calcs.pdf

Compliance Advisories/ Regulatory Updates cont.

- 3/15/2012 (Update from December 2011)
 - Rule 219-Exempt Equipment
 - Clarifies/defines acceptable recordkeeping procedures
 - Equipment with Pilot Lights
 - Requires both fuel consumed by, and emissions resulting from, pilot lights shall be accounted for by one of three approaches

Source:

http://www.aqmd.gov/reclaim/docs/Compliance_AdvisoryR219_And_Pilot_Light_2012-03-15.pdf

Compliance Advisories/ Regulatory Updates cont.

- SOx Shave begins Compliance Year 2013
- 2012 Draft AQMP
 - 9/6/2012 - Draft Program Environmental Impact Report (EIR) released
 - Comment period for the draft EIR ends 10/23/2012
 - Another NOx shave on the horizon???
 - CMB-01 – FURTHER NOX REDUCTIONS FROM RECLAIM (Proposed):
 - Phase I - seeks further reductions of 2-3 tpd of NOx allocations by 2014
 - Phase II - seeks further reductions of 1-2 tpd of NOx allocations by 2020

Discussion

QUESTIONS?