



EQUATE WORKING GROUP

EMISSIONS QUANTIFICATION AND TESTING EVALUATION

SEPTEMBER 20, 2019

- Assessment of the Source Test Protocol/ Report Submittal and Review Process Used for Permitting (E&P), Compliance (C&E), and
- AB 2588/Annual Emissions Reports (AER)
- Review of Default Emissions Factors for AER

BACKGROUND

- Source tests and default emission factors are key technical data for:
 - Processing permits
 - Demonstration of compliance
 - Emissions quantification, including air toxics
- Source test protocols and reports are submitted depending on their intended use:
 - Permit to operate
 - Compliance demonstration
 - Certification for small equipment
 - Air toxic emissions under AB 2588

RECENT TRENDS

- In recent years, source test requirements have increased:
 - Requirements for compliance demonstrations
 - Periodic testing requirements through permit conditions
 - New technology and reformulations require broader testing for toxic emissions

SOURCE TESTS FOR EMISSION FEES

- Default emissions factors are used in the absence of source test results, and concern exists that they:
 - Tend to be conservative in nature
 - May not be directly applicable
- During the recent budget process, stakeholders commented on the need for updated default toxic emission factors, including streamlined staff review and approval of source tests used for emissions reporting

DIRECTION FROM SOUTH COAST AQMD GOVERNING BOARD

PART I

Assess and improve the source test review/approval process

- Develop a plan, in consultation with a Working Group, to set priorities for processing the existing and anticipated inventory of source tests
- Commit to a process and schedule to address the expected increase in source test reviews due to revised toxic fees, including reducing current inventory of source tests as well as targets for completion of reviews
- Present to Stationary Source Committee in **December 2019**

DIRECTION FROM SOUTH COAST AQMD GOVERNING BOARD

PART 2

Review and update default emission factors

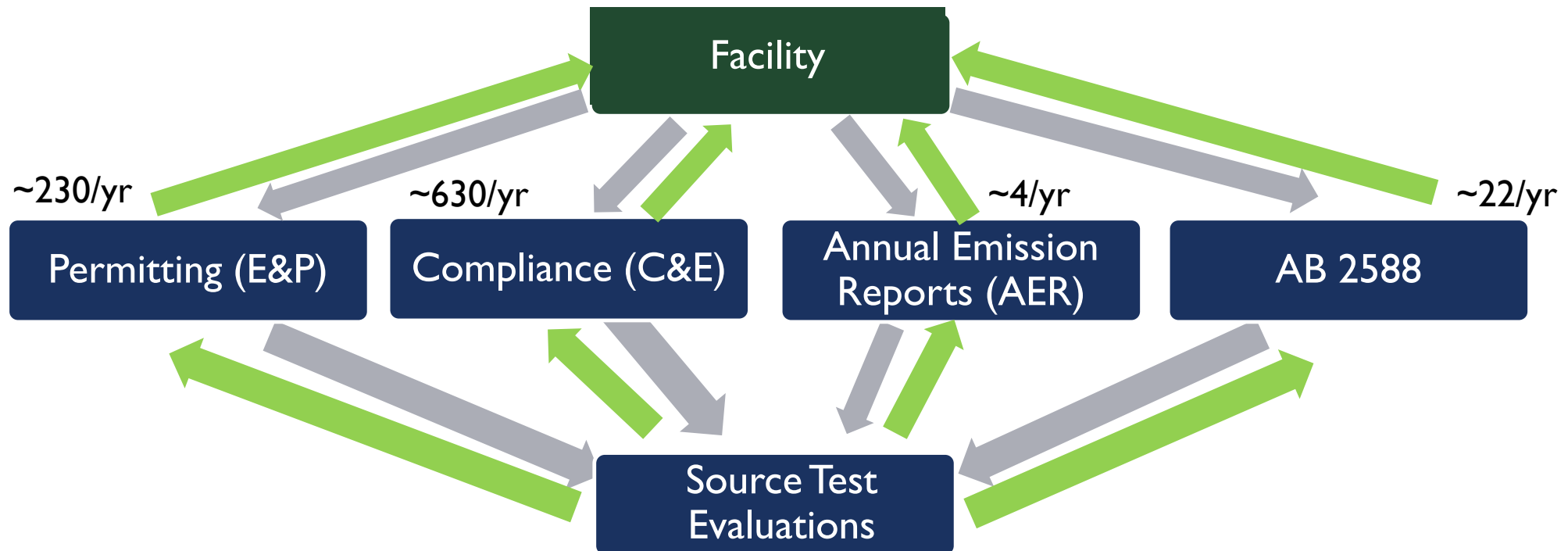
- Initiate review of default emission factors used for emissions reporting and update these factors as appropriate, in consultation with a Working Group
- Status report to Stationary Source Committee by **June 2020**

EQUATE WORKING GROUP

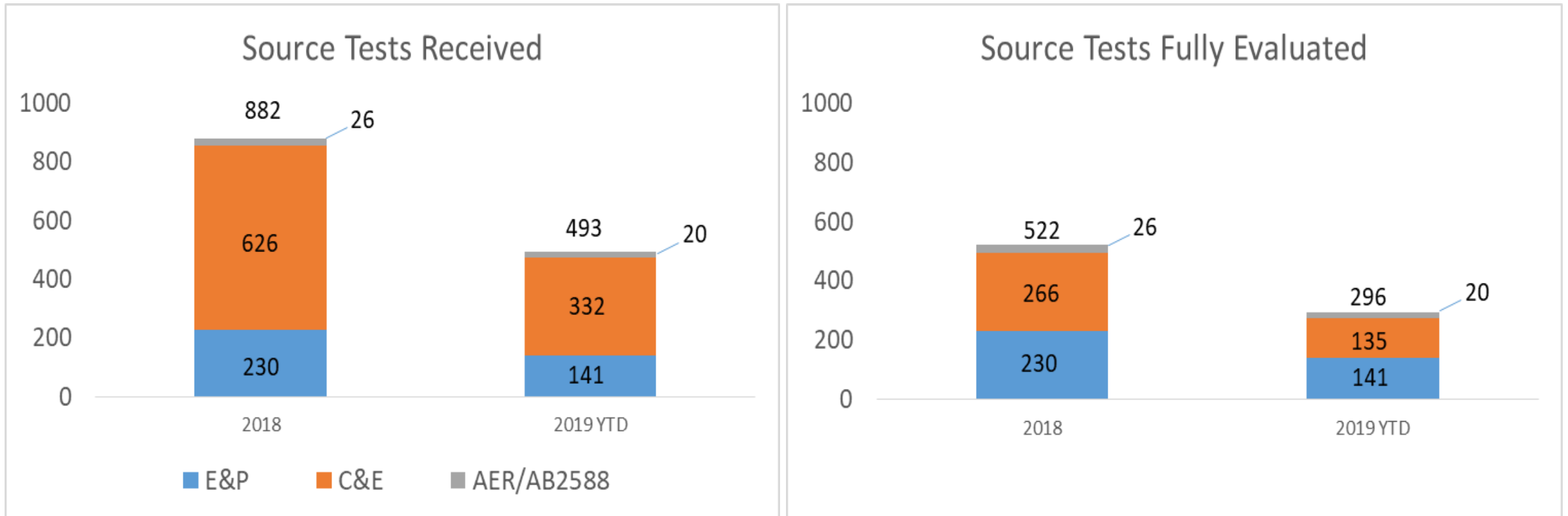
- Staff has begun to assess source test submittal and review process, and the priority was increased due to Board directive
- The Working Group is needed for:
 - Improving communication between stakeholders and South Coast AQMD staff
 - Streamlining source test submittals to improve efficiency
 - Providing input to improve process flow
 - Developing a more transparent process
 - Providing input for prioritization of protocol and report reviews

CURRENT SOURCE TEST PROTOCOL/REPORT SUBMITTAL PROCESS

Source Tests Reports/ Protocols are submitted to various South Coast AQMD departments



BREAKDOWN BY DEPARTMENT



All figures include protocols (39% of total) and reports (61% of total)

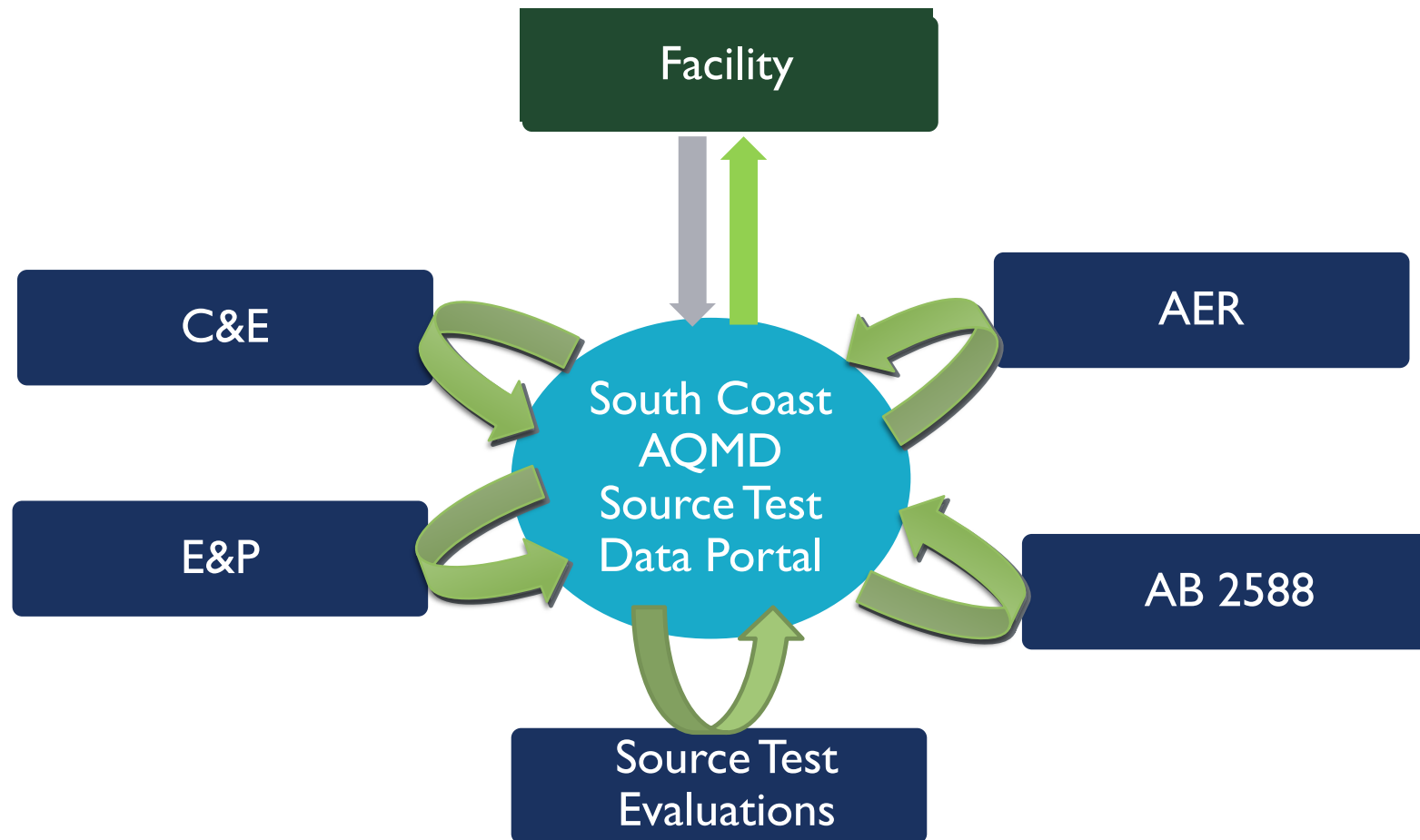
EXISTING CHALLENGES

- Incomplete Submissions
- Multiple Routes for Protocols and Reports Submittal
 - Confusion on submittal contact and method
 - Limited ability to verify receipt and track submittals
 - Delays in forwarding submittals to appropriate department for evaluations
- Duplicate Submittals
- Staffing Resources
- Other Priorities

PROPOSED SOLUTIONS

- Implement an electronic submittal, tracking/dashboard, and routing system
- Evaluate and prioritize categories of source test protocol and report review
- Evaluate and adjust staffing needs as necessary

SUBMITTAL PROCESS WITH PROPOSED ELECTRONIC PORTAL

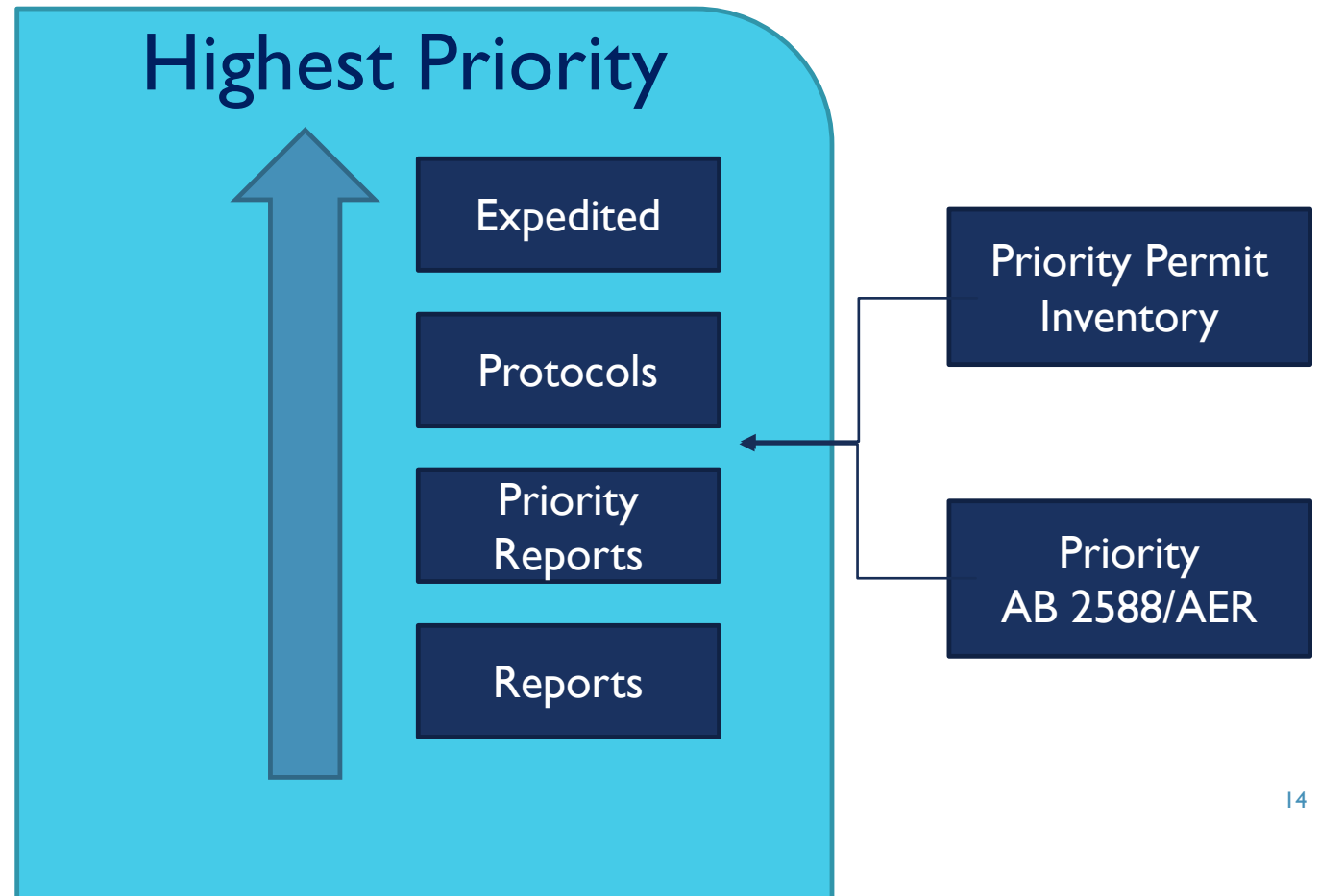


SOURCE TEST TRACKING SYSTEM - KEY FEATURES

- Source Test Document Submittal Portal
 - Centralized document storage
 - Automated routing
- Source Test Evaluation and Workflow Portal
 - Track milestones during prioritization/evaluation process
- Source Test Dashboard
 - Transparency throughout entire process
 - Real-time feedback
 - Statistics for future improvements

ADDITIONAL PRIORITIZATION

- Adding and placing new prioritization categories
- Still have option for an “Expedited” review



SCHEDULE

- September 27, 2019 – Written Comments due to Mike Garibay
 - Seeking comments on source test submittal, routing, prioritization, and tracking
- October 10, 2019 – Working Group Meeting #2
- November 14, 2019 – Working Group Meeting #3
- December 2019 – Present plan to Stationary Source Committee (tentative)
- January 2020 – Transition Working Group to address updates to default emission factors

CONTACTS

General	Source Testing	Source Test Web Portal
Eugene Kang (909) 396-3524 ekang@aqmd.gov	Mike Garibay (909) 396-2249 mgaribay@aqmd.gov	Louis Fan (909) 396-2728 yfan@aqmd.gov

DISCUSSION

- Proposed data portal
 - User Interface
 - Dashboard
- Prioritization order
- Other ideas for source test document submittal and review process