SCAQMD AB 617 Implementation

EJAG

JANUARY 26, 2018

Key Components of AB 617

Monitoring

- Identification of Communities
- Statewide Monitoring Plan
- District and Community operated networks
- Statewide data display

Community Emission Reduction Plans

- Identification of Communities
- Statewide Strategy
- District Community Emission Reduction Plans
- State and District emission reduction strategies

Best Available Retrofit Control Technology

- Development of Statewide BACT/BARCT Clearinghouse
- Develop mechanisms to input new determinations
- Implement BARCT

Emissions Reporting

- Uniform Statewide Reporting
- Statewide Pollution Mapping Tool

Timing

Monitoring

- Monitoring Plan by October **2018**
- Deploy networks in identified communities by July **2019**
- updated January every year thereafter

Community Emission Reduction Plans

- Identification of Communities by October **2018**
- Statewide Strategy by October **2018**
- District Community Emission Reduction Plans by October **2019**
- updated every 5 years

Best Available Retrofit Control Technology

- Development of Statewide BACT/BARCT Clearinghouse
- District schedule for BARCT by end of **2018**
- Implement BARCT by end of **2023**

Emissions Reporting

- No timelines in statute, but anticipated actions by **2019**

Key Implementation Issues for SCAQMD

- Funding
  - $27 million statewide for AB617 Implementation ($10.7 million for SCAQMD)
  - $250 million+ statewide for mobile source emission reduction ($107.5 million for SCAQMD, plus other competitive grant opportunities)
- Staffing
  - Community ID process and outreach
  - Monitoring
  - Community Emission Reduction Plans
  - BARCT rules and implementation
  - Emission Inventory, BARCT, and BACT work with CARB
- Timing and Deadlines
  - Very challenging in every case

Community Identification

- Process and criteria for identifying communities is actively being developed
- SCAQMD recommended a nomination process for community identification, CARB is working on procedures
  - CARB would establish overall criteria and process
  - Air Districts and others can submit nominations
  - Local outreach and public process by Air Districts
  - Utilize existing public data sets
    - CalEnviroScreen (Air pollution-related or other factors?)
    - Multiple Air Toxics Exposure Studies (MATES)
    - Criteria pollutant and air toxics emissions reporting
    - Existing Health Risk Assessments (Mobile and Stationary)
- Comprehensive list with prioritizations

Monitoring

- Development of Statewide Monitoring Plan
  - Review of current air monitoring technologies
  - Review of existing community monitoring deployments
  - Recommendations for additional monitoring
  - Utilization of low-cost sensor technology
    - Sensor evaluation (AQ-SPEC)
    - PM measurements feasible, but does not cover most pollutants of concern
- Community Air Monitoring
  - Real-time continuous monitoring preferred when feasible
  - Community partnerships to conduct monitoring
  - Use of a statewide data display system to provide monitoring data to public
    - Leverage state and local resources where possible
  - Outreach to public needed to ensure proper communication and interpretation of monitoring data
  - QA/QC of monitored data is critical

Community Emission Reduction Plans

- Statewide guidelines to be developed
- Achieving emissions real and quantifiable emissions reductions in communities
  - Transparent process to solicit input from communities and facilities is critical to success
  - Statewide guidance needs to be clear and provide accountability, but allow flexibility to meet individual community needs
  - Need to quantify expected future emissions and exposure reductions due to existing regulations and programs
  - Additional quantification of emissions at some facilities needed (fugitive emissions, unpermitted sources, etc.)
  - Monitoring might uncover previously unidentified emission sources
  - Identification of emission reduction measures (community-based AQMP)
  - How are targets and timelines for emissions reductions established?

Best Available Retrofit Control Technology (BARCT)

- Each air district develops its own BACT/BARCT determinations
  - Different air districts set different BARCT levels based on policy considerations, eg. severity of air quality problems, cost-effectiveness, uniqueness of sources, proximity to communities
  - Database should highlight and acknowledge differences in BARCT determinations across air districts
- Consolidation of each air district's existing determinations into a central database
  - CARB's goal is to have the database ready by January 1, 2018
  - Database should be easy to use, searchable, and downloadable
  - Include cost-effectiveness thresholds and other factors that were included in analysis
- Develop a mechanism for future determinations
- SCAQMD continues with expedited RECLAIM sunset and corresponding BARCT rules

Emissions Reporting

- Applicable facilities must report emissions to a statewide, uniform system for criteria and toxics on annual basis
  - SCAQMD already requires annual reporting for criteria pollutants and a subset of air toxics
  - No current standardized method of emissions reporting across air districts
  - Development of a new reporting tool, but use existing tools where possible
  - Key goal includes avoiding duplicative reporting to CARB and air districts
  - Emissions data will likely be available through CARB's AB 197 Pollution Mapping Tool
- Facilities with "elevated" AB 2588 Toxics Hot Spots Act priority scores must report
  - Methodology to calculate priority scores also vary across air districts
  - No definition of "elevated"

Current SCAQMD Approach

- Close Coordination with CARB
  - High level meetings and ongoing staff Working Groups for each topic area
    - Funding, roles, outreach, timing, guidance documents, clearing house, etc.
- Utilize existing SCAQMD resources and experience to the maximum extent possible
- Continue to assess expected workload and resource needs
- Access funding ASAP for timely implementation
- Early action successes make case for continued funding
- Governing Board approved 36.5 FTEs and equipment purchases in January
- Need to begin hiring process and start work immediately