

# ERM MARKET UPDATE

Proposed Revisions to

## California AB2588 Emission Inventory Criteria and Guidelines

October 2020



**The California Air Resources Board (CARB) has proposed multiple amendments to the AB2588 Emission Inventory Criteria and Guidelines (EICG). The revisions include adding a substantial number of substances to the reporting requirements, updates to the reporting and source testing guidelines, and revisions to diesel engine reporting requirements. As a result, the amendments to the EICG may require facilities to develop new or updated toxic emissions inventories.**

CARB is amending the EICG to improve air toxics emissions estimates in support of public health, enhance public right-to-know, and streamline the program with other reporting programs. AB2588, California's Air Toxics "Hot Spots" Information and Assessment Act, is intended to identify and reduce localized impacts due to toxic air emissions and requires stationary sources to report the types and quantities of certain substances routinely released into the air. The key amendments that CARB is proposing to each section of the guidelines are summarized below.

### List of Substances to Report

CARB is proposed to add approximately 900 new substances, including around 730 substances for which emissions must be quantified if emitted; 10 substances for which production, use, or other presence must be reported; and 160 substances for which emissions need to be reported only if manufactured by the facility. CARB is also proposing to add three new chemical functional group categories, including isocyanate compounds, derivatives of polycyclic aromatic hydrocarbons (PAH), and poly- and per-fluorinated compounds (i.e., PFAS). The proposed chemical substances are classified into two lists to differentiate the priority for reporting. The higher priority group includes PFAS, phthalates, and flame retardants. Additionally, CARB intends to develop a non-regulatory technical supplement on the health impacts and known uses of chemicals.

### Reporting Format and Instruction Revisions

The required reporting format will see minor changes, including removing hard copy reporting and adding the requirements to collect building information for downwash analysis. Provisions for the detection limits will also be added to the regulation text.

### Source Testing

The amendments will include updating stationary source emissions measurements and fuel analysis methods to current versions and proposing a new two-step process for sources that receive waste streams. The two-step process includes an initial, board qualitative screening for detectable chemicals, followed by the quantitative testing for a shorter list of chemicals determined based on the first step. CARB is also allowing a "pooled" source test approach among similar facilities.

## Reporting Requirements for Low-Emitting Facilities

CARB is updating the table of classes/sectors and expanding the sector list to harmonize with AB617 Criteria and Toxics Reporting (CTR) regulation. As such, a revision that is currently under consideration is to add a new class/sector for facilities that emit more than 4 tons per year of a single criteria pollutant (but less than 10 tons per year). Additionally, CARB is lowering the reporting thresholds for some selected processes. If these proposed amendments are implemented, facilities that were previously exempt may now be subject to reporting requirements and will require re-evaluation.

## Diesel Engine Requirements

The diesel engine risk screening tables will be updated to reflect updated OEHHA risk methods and the latest modeling requirements, and will be expanded to include more engine scenarios. “Large” facilities will be required to report emissions for “stationary” portable diesel engines rated greater than 50 horsepower and emissions from predictable or routine activities/operations will be subject to inventory reporting requirements.

## What Does this Mean For My Site?

The amendments to the EICG may require facilities that have not had to report previously to create a toxic emissions inventory plan that will be reported every four years. Facilities that already report toxic emissions will have to re-evaluate and likely update their inventory plans to report additional pollutants after implementation. Table 1 below summarizes the expected timeline for the proposed amendments to become effective for the Air Districts in California. ERM staff have been supporting facilities with AB2588 requirements for over 25 years and are ready to help and provide site-specific recommendations and support.

**Table 1. Timeline of Changes**

Action	Date	
	South Coast, Bay Area, San Diego, San Joaquin, Sacramento, and Imperial County	Other Air Districts
Public Review/Comment Period	October-November 16, 2020 (all)	
California Air Resources Board Hearing to Amend Regulation	November 2020 (all)	
Phase 1 Industries Collect Data For Priority Chemicals	2022	2023
Phase 2 Industries Collect Data For Priority Chemicals	2024	2025
Phase 3 Industries Collect Data for Priority Chemicals	2025	2026
All Industries Collect Data for All Chemicals	2026	2027

## Key contacts

For more information, contact your current ERM consultant or one of the following air quality experts below:

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