



San Diego County Air Pollution Control District

EMISSION INVENTORY FEE PROPOSAL

July 31 Workshop on Proposed Revisions to Rule 40

2024



Outline

- Overview of Emission Inventory Program
- New Emission Inventory Requirements
- Emission Inventory Fee Proposal
- Timeline and Next Steps
- Questions/Feedback



Emission Inventory

Federal, State and Local Rules Require Emission Inventory Reports

- Emission Inventory Reports quantify air emissions for sources we regulate providing information for our regulatory programs and the public

Emission Inventory Program Enhancements

- Emission Inventory System (EIS) Development & Implementation
- District Rule 19.3

San Diego County Emission Inventory Requirement

- Approximately 200 facilities annually



Emission Inventory Requirements

Facilities Historically inventoried ~ 200

Criteria Emissions Inventory (CEI) (Rule 19.3)

- Requires emissions of CO, Pb, NO_x, PM, SO_x or VOC for any facility which emits 5 tons or greater of VOCs or NO_x per year or in excess of thresholds stated in the District Community Air Protection Program.

Toxic Emissions Inventory (TEI) "Hot Spots" Program (CARB AB2588)

- The Toxics Emissions Inventory or "Hot Spots" Program requires toxic air contaminants emissions and creation of health risk prioritization scores

Criteria Pollutant and Toxics Emission Reporting (CARB CTR)

- Requires emissions from facilities subject to the general applicability, § 93401(a), of CTR Regulation.

Emission Inventory Program

San Diego County Emission Inventory Requirements

- Recent State CTR and AB2588 amendments result in significant expansion in facilities and pollutants subject to emission inventory requirements
 - Increased number of Toxic Air Contaminants required to be evaluated. 250 new pollutants in data year 2022, 780 new pollutants in data year 2026
 - Increased data reporting requirements for facilities applicable to CTR General Applicability
- More complete inventory of local air pollution sources requires additional resources



Emission Inventory Program

Emission Inventory Program Enhancements

- Expanded the Emission Inventory Group
- Amended District Rule 19.3 to streamline emission data submittal
- Enhanced Emission Inventory System (EIS)
- Awarded one-time grant funding



Emission Inventory Requirements

New Facilities after Amended CTR ~ 4,500

2022

- Sector Phase 1
- ~3,700 Permits

2024

- Sector Phase 2
- ~1,500 Permits

2025

- Sector Phase 3
- ~1,300 Permits

2026

- Sector Phases 1, 2 & 3
- Accumulated ~6,500 Permits annual reporting

2028

- Sector 3B
- ~20 Permits

Proposed Emission Inventory Fees

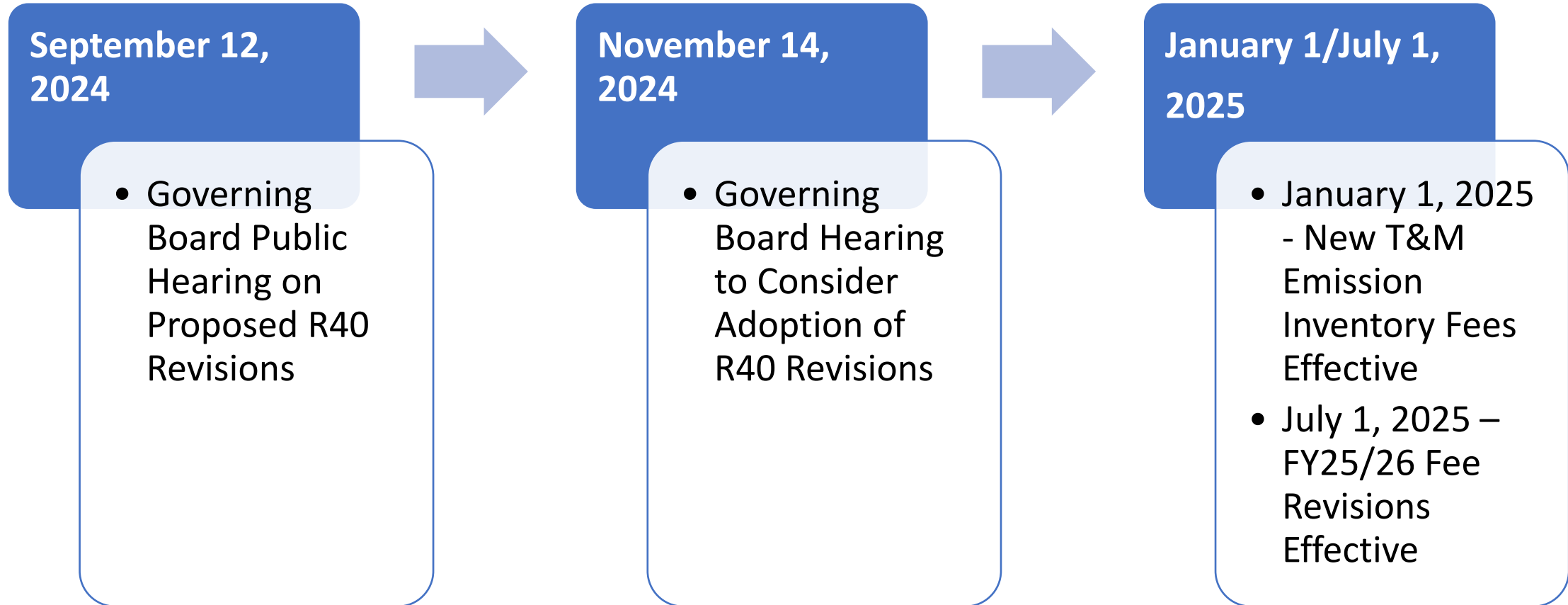
Phased approach is proposed as follows:

Implement a Time and Material fee on January 1, 2025, for facilities that have been historically inventoried.

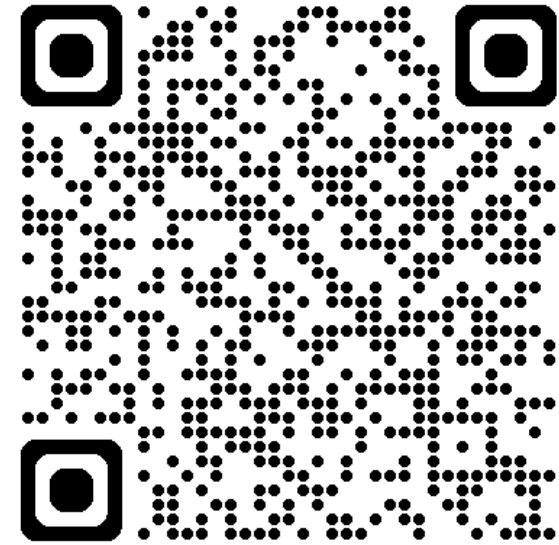
Evaluate implementation of a fixed fee for the remaining CTR facilities for Fiscal Year 2026/27.



Next Steps for Current Proposal



Feedback



<https://www.sdapcd.org/content/sdapcd/rules/workshops.html>

We welcome your input

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