

## **South Coast Air Quality Management District**

# AB 2588 Quadrennial Air Toxics Emissions Inventory Reporting Procedures using Annual Emissions Reporting Tool

AB 2588 Program January 2025

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South Coast AQMD January 2025

#### **Background**

Under the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588 Program), facilities are required to provide an update of their toxics emissions inventory to South Coast Air Quality Management District (South Coast AQMD) on a quadrennial basis (or once every four years). Currently, there are approximately 450 AB 2588 facilities, which are grouped into four phases for reporting purposes (i.e., Phase 1A, 1B, 2, and 3), and each phase reports once over a quadrennial (four year) cycle. Toxic inventories are based on calendar year (i.e., January 1 through December 31). Emissions reporting is performed using the South Coast AQMD's Annual Emissions Reporting (AER) Reporting Tool (webtool).

Every year, all the facilities in one phase (out of the four phases) are required to submit their complete quadrennial toxics emissions inventory to South Coast AQMD. These emissions are then audited and facilities are prioritized from the information in their quadrennial inventory; facilities with a priority score<sup>1</sup> greater than ten (10) may be required to prepare an Air Toxics Inventory Report (ATIR) and Health Risk Assessment (HRA), if necessary.<sup>2</sup> If required, the facility will input facility information including a detailed toxics emissions inventory by device along with source parameter and location information into the "Hot Spots" Analysis and Reporting Program (HARP).<sup>3</sup> Facilities will have to re-enter much of their toxic emissions reported to AER into HARP as there is currently no mechanism to upload AER data into HARP.

#### **Reporting Procedures for AB 2588 Facilities**

The following is a summary of procedures for AB 2588 facilities for reporting their quadrennial toxics emissions inventory to South Coast AQMD:

- Reporting of toxic emissions is performed under South Coast AQMD's AER Program.
- The AER webtool is the only acceptable means of reporting criteria pollutants and toxics.
- The webtool will automatically identify if your facility is in the AB 2588 Program and subject to a quadrennial update, as illustrated in the image below.

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Priority score is a facility's position on a scale representing potential health risks. The priority score is determined by an algorithm that considers potency, toxicity, quantity, and volume of hazardous material released from the facility; and the proximity of the facility to potential receptors. South Coast AQMD's prioritization procedures are available at: <a href="http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab-2588-facility-prioritization-procedure.pdf">http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab-2588-facility-prioritization-procedure.pdf</a>

Detailed information on preparing an ATIR and HRA are in the AB 2588 and Rule 1402 Supplemental Guidelines (Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics "Hot Spots" Information and Assessment Act). The most recent version of the Supplemental Guidelines is available at: https://www.aqmd.gov/home/rules-compliance/compliance/toxic-hot-spots-ab-2588

HARP is a single integrated analysis tool that streamlines the emissions inventory and risks assessment requirements of the AB 2588 Program.



- The reporting cycle is based on calendar year (CY) (i.e., January 1 to December 31) to be consistent with the AER Program.
- The list of toxics applicable to AB 2588 quadrennial reporting can be found on the AER website.<sup>4</sup> For unlisted metal compounds with a listed elemental metal, report emissions using the elemental metal's weight fraction in the compound.
- AB 2588 quadrennial reporting should follow the guidance for degree of accuracy reporting thresholds outlined in CARB's Emission Inventory and Criteria Guidelines (EICG).<sup>5</sup>

#### **Streamlined AB 2588 reporting process:**

- Beginning in 2022, facilities that are designated as high priority in the AB 2588 Program (priority score greater than 10) may be required to report additional information as prescribed in CARB's Criteria and Toxics Emission Reporting (CTR) Regulation, 6 Section 93403.
- AB 2588 facilities are also required to report the corresponding criteria pollutant emissions on the applicable forms and pay corresponding emissions fees if they exceed the thresholds. As specified in South Coast AQMD's Rule 301(e), facilities emitting 4 tons or more of reactive organic gases (ROG), oxides of nitrogen (NO<sub>X</sub>), oxides of sulfur (SO<sub>X</sub>), specific

<sup>&</sup>lt;sup>4</sup> The list of toxics required for quadrennial reporting is available here: <a href="https://www.aqmd.gov/docs/default-source/planning/annual-emission-reporting/tac-list-dy2024.xlsx">https://www.aqmd.gov/docs/default-source/planning/annual-emission-reporting/tac-list-dy2024.xlsx</a>

<sup>&</sup>lt;sup>5</sup> https://ww2.arb.ca.gov/our-work/programs/ab-2588-air-toxics-hot-spots/hot-spots-inventory-guidelines

<sup>&</sup>lt;sup>6</sup> https://ww2.arb.ca.gov/our-work/programs/criteria-and-toxics-reporting

- organics (SPOG), and particulate matter (PM) or emitting 100 tons or more of carbon monoxide (CO) are required to pay emission fees based on the total weight of emissions.
- During the sixty (60) days allowed for filing the report, South Coast AQMD's AER program will conduct public outreach through informational workshops and public assistance through telephone hotline, fax, e-mail, and Internet to assist facilities in filing their reports. Individual appointments may be arranged upon request.
- The toxics emissions data submitted by facilities will be used for determining whether a new or revised HRA is required.
- Default emission factors for various processes can be found on the AER program website. The provided emission factors are conservative, and therefore may overestimate emissions. If any of your facility's equipment has South Coast AQMD-approved source test results, these should be used for emission calculation.
- South Coast AQMD maintains the right to review and audit the reported data and request additional data for clarification, if necessary.

#### **Receptor Distances**

Receptor locations are off-site locations where persons may be exposed to toxic emissions emitted from a facility. Residential receptor locations include current residential land uses and areas that may be developed for residential uses in the future, given land use trends in the general area. Commercial receptor locations include areas zoned for manufacturing, light or heavy industry, retail activity, or locations that are regular work sites. Sensitive receptors include locations of high densities of individuals who may be more sensitive to toxic exposures than the general population.

<u>Worker Receptor Distance</u> - Closest distance between any source of air toxic emissions at your facility and the property boundary of any one of the following receptors: other business or worksite, shopping center, or any other commercial site.

<u>Residential Receptor Distance</u> - Closest distance between any source of air toxic emissions at your facility and the property boundary of any one of the following receptors: house, apartment, convalescent home, trailer park, or other residence.

<u>Sensitive Receptor Distance</u> - Closest distance between any source of air toxic emissions at a facility and the property boundary of a location with high densities of sensitive individuals. These locations include but are not limited to any one of the following: schools, nursing homes, residential care facilities, day care centers, and hospitals.

If you are an AB 2588 facility that is filing a quadrennial toxic emissions inventory, list your closest worker, residential, and sensitive receptor distance in the space provided in the tool. Please see Facility Information section of the AER Help and Support Manual for instructions on filling out the receptor data.

#### **Additional Information**

- For emissions calculation guidelines, webtool instructions, frequently asked questions, and other helpful information, please visit <a href="www.aqmd.gov/aer">www.aqmd.gov/aer</a>.
- For additional information about the AB 2588 Program, please visit <u>www.aqmd.gov/ab2588</u>.