

This preliminary discussion draft is provided for review purposes only. The draft is subject to ongoing revisions and refinement. The pre-existing regulation text is set forth below in normal type. The proposed amendments are shown in underline to indicate additions and ~~strikeout~~ to indicate deletions. The notation “. . .” in the proposed revisions to Appendix D indicates intervening text that is not shown.

A. Source Testing Requirements

As a result of the proposed amendments to the EICG Report, some owners and operators of facilities subject to the regulation may be required to perform source testing according to Section IX and Appendix D for some substances.

While the AB2588 statute allows for the appropriate use of methods to estimate emissions (including emissions factors, modeling, mass balance analysis, and projections), the statute requires source testing wherever necessary to verify emission estimates to the extent technologically feasible (Health & Safety Code (H&SC) Section 44342(c)). Additionally, the statute requires that “the measurement technologies and estimation methods proposed provide state-of-the-art effectiveness and are sufficient to produce a true representation of the types and quantities of air releases from the facility.” (H&SC Section 44340(c)(3)). Furthermore, the statute requires that data are collected or calculated to ensure a characterization of risk associated with exposure to releases of the hazardous material that meets the Office of Environmental Health Hazard Assessment (OEHHA) guidelines (H&SC Section 44340(c)(5)). These statutory requirements serve as the foundation for the required source testing in the EICG Report, as well as the proposed amendments to the source testing requirements.

The proposed amendments include revisions to existing methods referenced in the EICG Report. Section IX.A of the EICG Report incorporates by reference several U.S. EPA and ASTM International fuel analysis methods. These methods (except for one) have been superseded, withdrawn, or replaced with more current methods. Where applicable, these existing methods are proposed to be revised to the most recent revision of the method or a suitable replacement of the method. Table 1 presents the proposed revisions to the existing source testing references in section IX.A of the EICG Report.

Table 1. Proposed Revisions to Existing Source Testing References in EICG, Section IX.A

Existing Method / Date	Proposed Revised Method / Date
EPA Method 7196A	None (existing method is most current)
EPA Method 7471A / September 1994	<u>EPA Method 7471B / February 2007</u>
EPA Method 7740 / September 1986	<u>EPA Method 7010 / February 2007</u>
EPA Method 6010A / July 1992	<u>EPA Method 6010D / July 2018</u>
ASTM Method D 2361-95 / Reapproved 2002	<u>ASTM Method D 6721-01 / Reapproved 2015</u>
ASTM Method D 3177-02	<u>ASTM Method D 4239-18e1</u>
ASTM Method E 776-87 / Reapproved 2004	<u>ASTM Method E 776-16</u>
ASTM Method E 775-87 / Reapproved 2004	<u>ASTM Method E 775-15</u>
ASTM Method D 808-05	<u>ASTM Method D 808-16</u>
ASTM Method D 129-00	<u>ASTM Method D 129-18</u>

Proposed Source Testing Requirements for ‘open’ sources

In addition to revising existing methods, new source testing requirements are being proposed for certain types of “open” sources: wastewater treatment plants, landfills, composting and recycling facilities, and scrap metal recovery and metal shredding facilities. The operation of these facilities is unique in that it involves accepting waste streams for processing that could potentially contain and emit almost any listed substance of Appendix A-1 of the EICG Report. Therefore, to adequately characterize the types of substances that may be present in the waste stream, a two-step testing protocol is proposed for these facilities.

The first step of the proposed two-step testing protocol involves a qualitative test; this step would be used to identify potential listed substances of concern for the specific emitting process, device, or facility activities listed in Appendix D of the EICG Report. From the results of the first-step qualitative test, a testing program protocol would be developed to perform the quantitative testing required by the second-step of the proposed two-step testing protocol. These quantitative results would be used to develop representative emission factors for the emitting processes, devices, or facility activities. The two-step testing protocol is proposed to include procedures for conducting air emissions sampling at these open sources using an emission isolation flux chamber. These procedures may be used for both the qualitative and quantitative phases of testing. The two-step testing protocol is proposed under section IX.H of the EICG Report.

Existing relief in the form of alternatives to source testing and “pooled” source testing will continue to be available to reduce the cost burden associated with the direct measurement of emissions from a source. For some source tests specified in Appendix D, an alternative method is specified for use by small businesses to reduce costs. These alternative methods either give relief to small businesses by exempting them from the requirement to perform a stack test for a specific substance, or substitute a specific stack test for an analysis of the fuel or material used.

In addition, an existing mechanism in the EICG Report to reduce costs for facilities subject to performing source testing are the “pooled source testing” provisions of Section IX. This mechanism will continue to be in the regulation and provide an option for groups of related facilities to propose an emissions testing program to develop representative emissions factors for those types of facilities. It is anticipated that some facilities subject to the proposed new testing requirements (i.e., two-step testing protocol) would utilize the pooled source testing provisions in the EICG Report. As before, the proposed pooled source testing program must be reviewed by the air district and CARB.

Proposed Revisions to Appendix D

Emitting Process, Device or Facility Activity	Substance and Type of Test	Alternative (if any)
...		
--OTHER PROCESSES--		
8. Waste water treatment facilities - including Publicly Owned Treatment Works (POTWs)		
- Sludge incinerator	Same as Incinerators 1(a)	Same as Incinerators 1(a)
- <u>Unit processes (including preliminary treatment, primary treatment, secondary treatment, basins, solids and sludge handling, filtration, and chlorination), or as proposed</u>	a. <u>Listed substances/two-step test</u>	-
...		
11. Smelters and foundries		
(a) All	a. Full set metals/stack test	Small business: Metals test/feed material analysis for As, Be, Cd, Cr(VI), Ni, Pb
	b. Hydrogen sulfide/stack test	Small business: Not required
(b) Secondary copper smelters	a. Same as 11(a) plus dioxins/stack test	-
<u>(c) Secondary aluminum production</u>		
- <u>Thermal chip dryers and secondary aluminum processing units processing material other than clean charge</u>	a. <u>Dioxins/stack test</u>	-
- <u>Scrap dryers/delacquering kilns/decoating kilns, sweat furnaces</u>	a. <u>Dioxins/stack test</u> b. <u>Hydrogen chloride/stack test</u>	- -
- <u>In-line fluxers using reactive flux materials and secondary aluminum processing units processing clean charge</u>	a. <u>Hydrogen chloride/stack test</u>	-

...

21. Landfills

- Active areas (e.g., daily and intermediate cover), final covered areas, or as proposed

a. Listed substances/two-step test :-

22. Composting

- Unit processes (including feedstock and receiving, composting, mixing, finished product, uncomposted feedstock, and fugitive emissions locations), or as proposed

a. Listed substances/two-step test :-

23. Scrap metal recycling and recovery

- Metal shredders

a. Listed substances/two-step test :-