

Frequently Asked Questions (FAQs) Regarding the Criteria Air Pollutants and Toxic Air Contaminants Reporting (CTR) Regulation

Part I – General Questions on the CTR Program

Why did CARB develop CTR?

The need for more rigorous emissions reporting was recognized in the original bill text of Assembly Bill (AB) 617¹, which specified that CARB requires “stationary sources” to annually report their emissions of criteria pollutants and toxic air contaminants using a uniform statewide system of reporting. The *Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants*, or CTR, was developed to meet the objectives of AB 617, but also to address the needs of numerous other CARB programs, like the community right-to-know tenets established in AB 197², and the toxic air contaminant emissions data received and evaluated through the *AB 2588 Air Toxics “Hot Spots”* program.

The current stationary source emissions reporting system (i.e., California Emission Inventory Development and Reporting System or CEIDARS) provides data to support CARB’s air quality programs in the form of stationary sources, area sources, and mobile sources. CARB’s stationary source database contains emissions data from over 27,000 facilities statewide; however, many of the smaller facilities are currently estimated using area source methodologies. The CTR amendments augment the stationary source inventory, over time by requiring these smaller facilities to report as stationary sources. The CTR is a step forward in improving transparency, uniformity, and consistency in reported emissions across the 35 air districts in California and will ensure the quality and completeness of reported emissions data. However, fully accomplishing the goals of CTR will take time (with significant effort from the subjected facilities and air districts) and will be phased-in over several years.

How does CTR support the AB 617 Community Air Protection and AB 2588 Air Toxics “Hot Spots” Programs?

CTR was developed to serve the needs of the AB 617 Community Air Protection and AB 2588 Air Toxics “Hot Spots” Programs. While CTR does not include any specific emissions reduction requirements, it supports the efforts of both programs by:

¹ AB 617 Bill Text: https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB617

² AB 197 Bill Text: https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160AB197

- Increasing both the number of sources and the number of individual toxic air contaminants to be reported from permitted stationary source facilities over a multiple-year phase-in period, leading to more complete information available for the determination of pollution exposure in impacted communities.
- Providing data to identify areas of concern throughout the state – including potential AB 617-eligible communities that have not yet been chosen – and over time to track progress in emissions reduction efforts in impacted communities.
- Supporting efforts at CARB to enhance the tools that are used to import and manage emissions data (such as a new emissions reporting tool) and developing improved visualization of emissions data for the public (separate from CTR requirements).
- Reinforcing the community right-to-know by creating a mechanism for people to request whether a facility is being inventoried through CTR, and if not, whether it should be inventoried.

In addition, the amendments to CTR were developed in conjunction with amendments to the AB 2588 Air Toxics “Hot Spots” guidelines for reporting emissions (called the “*Emission Inventory Criteria and Guidelines*” or EICG), to harmonize the reporting requirements of the CTR and Hot Spots programs.

When will data from CTR be available?

CTR implementation is integrated with existing emissions data collection efforts for both criteria pollutants and toxic air contaminants. Due to the scope of the amendments, reporting requirements are phased in over a period of seven years to minimize the burden of having many new stationary sources subject to emissions reporting all at once. The first year of data reporting under the amendments is 2023 – but this only includes a subset of facilities in air districts with a currently designated AB 617 community. These air districts are South Coast Air Quality Management District (AQMD), Bay Area AQMD, San Joaquin Valley Air Pollution Control District (APCD), San Diego County APCD, Sacramento Metropolitan AQMD, and Imperial County APCD. Data from additional facilities and air districts must be reported in subsequent years, according to the reporting schedule. As CTR is phased in over a period of seven years, more facilities become subject to reporting, until nearly every permitted source of air pollution will be reporting on an annual basis (beginning 2029). Having stationary sources report individually, rather than being estimated as an area source will provide more specificity of the location of air pollution from stationary sources around the state, improving the ability to identify sources that impact communities.

What outreach efforts have been conducted or are planned?

Public outreach for developing CTR has been extensive. Our intention was to provide as much outreach as possible in regions that are most likely to be affected by the proposed regulation. For both the original *2018 rulemaking* and the <https://ww2.arb.ca.gov/rulemaking/2020/proposed-amendments-reporting-criteria-air-pollutants-and-toxic-air-contaminants> 2020 amendments to the CTR regulation, CARB staff held multiple *workshops* across the state, in Sacramento, Oakland, San Joaquin Valley

(Fresno, Modesto, and Bakersfield), Los Angeles, and San Diego, in addition to online webinars. Attendance at the workshops included air district representatives, environmental groups, community groups, affected businesses, industry groups, academics, consultants, government agencies, and others.

Beyond the public meetings, outreach efforts also included numerous contacts via telephone, email, regular mail, and individual meetings with interested parties. CARB electronically notified over 28,000 individuals or companies via email lists. CARB staff also met with each of the 35 California local air districts to discuss how the reporting regulation would affect district workload, development of reporting requirements, and phase-in schedules for different sectors.

During the phase-in period, additional workgroups will be formed, and meetings will be held to facilitate the implementation and understanding of CTR and its requirements. CARB's CTR staff are working closely with the CARB CEIDARS liaisons and the air districts staff who annually work together to coordinate all reporting to CARB. These joint efforts to coordinate will facilitate the presentation of information and materials that detail the reporting requirements and streamline the reporting process for subjected facilities.

Part 2 – Technical Questions

General/Miscellaneous Questions

Do CTR reporting requirements supersede or replace existing emission reporting requirements and guidance, such as air district reporting rules, CARB's emissions inventory guidance for the National Emissions Inventory (NEI), or the AB 2588 EICG reporting requirements?

No. CTR was designed to establish consistent, minimum emissions reporting requirements to support multiple air quality programs that require robust emissions data from stationary sources, but it does not replace or supersede the requirements of other CARB programs, USEPA's requirement to submit data to the NEI, or local air district reporting programs, rules, or guidance. Districts should estimate emissions from the facilities subject to CTR and report them individually as stationary sources going forward.

The CTR program was designed to integrate and streamline the reporting of emissions from stationary source facilities, and to form a single reporting process for criteria pollutants and toxic air contaminant emissions released from facilities. This single reporting mechanism will combine the elements of existing emissions inventory data collection programs and will satisfy the reporting requirements for these programs, in support of CARB's air quality efforts (such as the [AB 617 Community Air Protection Program](#), AB 197 data transparency and availability, air toxics management programs including [Airborne Toxic Control Measures \(ATCM\)](#), the [AB 2588 Air Toxics "Hot Spots" Program](#), and more). However, CTR does not relieve facilities from providing data required by other programs, including air district rules and policies. If other CARB or district rules or policies related to emissions data collection are

more stringent than those in CTR (or collect data in addition to the CTR requirements), the more stringent requirements apply. If there are questions about agency reporting requirements that appear to be conflicting or ambiguous, please contact staff at ctr-report@arb.ca.gov, and we will be glad to help clarify the requirements and address any concerns.

When reporting toxics emissions, do all chemicals on the CTR/EICG list whose emissions equal or exceed applicable degree of accuracy on the AB 2588 list need to be reported?

CTR does not specify a reporting limit for toxics, but Section VIII(E)(3) of the *EICG* states, “*If facility emissions of a substance exceed one-half of the applicable degree of accuracy unit for the substance, the substance emissions shall be reported on Emission Information Forms.*” Report any emissions over ½ of the degree of accuracy for each applicable chemical, as listed in *Appendix A-1* of the *EICG*. All chemicals listed in CTR are also included in the *EICG*.

When reporting toxics emissions, does the facility need to report “zero” or “non-detect” for all the substances on the list that are not emitted? What if there is a substance being emitted from the facility that we are not aware of, and is not reported – will the facility be out of compliance?

Chemicals that are known to be emitted from the facility must be reported; the facility does not need to report “zero” or “not detected” for chemicals that are not emitted by the facility. However, a reasonable effort must be made to identify and report emissions of all applicable substances that are on the CTR/EICG chemical substance *lists*.

Under CTR, this requirement applies to all devices and processes for which the district has issued a permit to operate; however, under *EICG*, the district has the discretion to request and evaluate emissions from non-permitted processes as well. To assist in this process, *Appendix C* of the *EICG* provides chemical substances that are commonly emitted by various industrial sectors and processes. If it is discovered that an applicable substance is being emitted from a facility, and those emissions were not being reported in prior facility emissions data reports, CARB and air districts will communicate with facilities and use discretion in determining whether any requirements were violated. In many cases, if emissions of a newly discovered chemical are identified and reported, the absence of reporting these emissions in past reports will not be considered a violation of CTR reporting requirements, if the facility has made a diligent effort to identify and report all known substances.

Who has the obligation to report emissions from portable engines and devices that are used at a facility? If the facility hires a contractor to do maintenance or construction work on site, how can emissions be estimated from the contractor’s engines that are used while on-site?

Under CTR, facilities that report greenhouse gas emissions to the Mandatory Reporting Program (MRR) at CARB, and facilities that are permitted to emit over 250 tons of a

nonattainment criteria pollutant are required to include emissions from diesel-powered, portable engines over 50 brake-horsepower that are used on site during the year, regardless of ownership or permit status. Currently, this includes approximately 700 large facilities in the state. Facilities that don't meet these criteria are not required to include emission estimates from portable engines under CTR, but the local district may require such emissions to be reported pursuant to district policies.

We understand that often, when a contractor uses such engines on site, the facility operator may not own or operate the engines and may not be in the practice of collecting the data necessary to quantify emissions from the portable engines. CTR does not establish stringent protocols for the quantification of emissions estimates from such devices; the use of best available data and estimates is allowed. We encourage the facility operator to collect as much information on the number, size, emission rates, and use rates (hours of operation or fuel consumed) as feasible, to allow emission estimates that are as accurate as possible. If such data are missing, reasonable and conservative estimates of such use data can be estimated using best available information (e.g., averages for emission rates based on other sources of data). See additional question and answer in the "Quantification Methods and Reporting Questions" section of this FAQ document.

A facility has a source subject to CTR, but also other permitted sources. Would emissions from the other permitted sources need to be included in the reporting?

If any facility is subject to CTR reporting for a given year, then all permitted sources (as well as any additional sources that are required under district reporting rules or policies) must be included in the emissions report, using best available data and methods.

In Table A-3 of CTR regulation, are the diesel and natural gas fuel combustion activity thresholds for Sectors 8, 29, 45, and 47 based on a device-specific or facility-wide basis?

These diesel and natural gas fuel combustion activity thresholds are per device, and not facility wide.

In CTR, there is some general guidance on activity data units: Activity levels for fuel use are to be reported in units of million British thermal units (MMbtu) for gases (or optionally, million of standard cubic feet (MMscf)), gallons for liquids, short tons for non-biomass solids, and bone-dry short tons for biomass-derived solids. Does this mean that these units should be used irrespective of the Source Classification (SCC) Code assigned?

For CTR reporting, please report the activity data units as descriptively and accurately as possible. The actual activity data units of measure associated with the calculation of emissions should be reported. Reporters should not overwrite more representative data with incorrect or standardized "default" data.

The current emissions inventory guidance for CEIDARS states that process rate must be reported in SCC units. Does the CTR require something different?

CTR requires the process rate (activity level and activity level units of measure) to be reported, such as gallons of fuel, MMbtu of fuel, hours of operation, etc. However, CTR does not specify that process rate data must be reported in default SCC units of measure. If process rate data are used to quantify emissions from a process, actual units of measure for process rate should always be reported, as applicable.

How should the USEPA's Unit Type Code be reported? Is CARB assigning this post-submission? Is there a crosswalk available for SCC to EPA Unit Type, due to similarities between the two systems?

USEPA's Unit Type Code should be assigned, if possible, for every device reported. CARB does not have plans to assign this post-submission but may develop a crosswalk if possible. Source Classification Codes (SCCs) and EPA Unit Type Codes do not have a simple relationship, and discrepancies must be resolved to develop a crosswalk.

We use a substance or operate equipment that matches a category in Table A-3 of CTR regulation; however, that usage/operation is in nonpermitted equipment or processes. Is the facility subject to reporting under CTR based on this information?

The sectors listed in Table A-3 of CTR *regulation* refer to usage in, or operation of, permitted processes. If the usage or operation is related to nonpermitted equipment/processes, then that usage or operation does not specifically trigger the facility's applicability to reporting under CTR.

Most diesel emergency engines in California are equipped with hourly meters – not fuel meters. The facility or district may be able to use the equipment specification to convert the operating hours either to fuel usage equivalents or directly to emissions estimates, using emission factors. Does CARB have guidance to select which engine load factor to apply to calculate the fuel usages or emissions based on operating hours?

Using operating hours from hour meters and applying emission factors in units of grams (or pounds) per horsepower-hour is frequently the most accurate way of estimating emissions. Reporting activity data/process rate data, and associated emissions, using the abbreviated reporting approach may be accomplished using gallons of diesel consumed and default (or unit-specific) emission factors based on gallons, or by using hours of operation with emission factors based on hours. The activity data to report for abbreviated reporting, and the emission factors to be used, are at the discretion of the air district.

There is not a prescribed method for estimating emissions from emergency diesel engines in the CTR, and the CTR does not require or recommend any specific engine load factor. In the absence of information regarding the load factor, reporters should assume 100% load. Using a 100% load factor is the most conservative approach and will calculate the highest possible emissions, which is the preferred and most conservative approach when evaluating the potential impacts of emissions. However, if an operator or district asserts that using a different load factor is more representative of actual operation, the CTR program would not consider it to be out of compliance. A reasonable justification for using the adjusted load factor should be kept in records.

Districts have discretion to advise their reporters to report in a specific way. Due to this discretion, it is prudent to consult the local air district, because district staff might have specific requirements.

The permitted process of Sector 1 in Table A-3 of CTR regulation reads: “Metal plating, anodizing, or grinding using cadmium or chromium”. Can you provide clarification of the intent of the regulatory text?

Sector 1’s permitted process should be read as: “Metal plating or anodizing using cadmium or chromium or grinding of metal containing cadmium or chromium.”

How should facilities report chromium related emissions?

CTR does not prescribe specific emissions quantification methods and states that “best available data and methods” should be used to quantify emissions estimates for all processes. Hexavalent chromium is particularly toxic and has a high cancer potency value; therefore, reporters and districts should speciate, quantify and report hexavalent and trivalent chromium and/or associated compounds, wherever possible, and as accurately as possible (as opposed to reporting total chromium amounts). There are literature-based emission factors for hexavalent chromium emissions from chromium plating baths, which are generally based on activity data collected in units of “amp-hours,” occurring during the process. Other “best available” methods may also be used. Fugitive emissions from plating, anodizing, and grinding operations may also occur, and health advocates have asserted that air monitoring data near chromium plating facilities suggests that fugitive emissions from these facilities are underestimated. Facilities and districts are encouraged to pursue reasonable methods to quantify and report fugitive chromium and cadmium emissions from such facilities, in addition to the emissions from the plating process.

Is there any effort underway to streamline the reporting process in the future and develop a statewide reporting portal instead of having different air districts handle submissions and emissions data using various approaches?

Yes, CARB is taking advantage of the latest technology to improve its system for reporting, managing, and publishing emissions data collected through CTR and EICG. Specifically, the Integrated Multi-Pollutant Emission Inventory (IMPEI) System project has been initiated which

will ultimately produce a new inventory system to replace the existing legacy system (i.e., CEIDARS). The IMPEI System is expected to be operational by the end of 2024. Facilities still have the regulatory obligation to report to their air districts, and the main reporting mechanism will still be data submissions from the air districts to CARB (IMPEI System) in the future.

Are those “sectors” and “sector phases” which Group B air districts need to address under CTR the same as the ones for Group A air districts?

Yes, they are the same.

What enforcement actions CARB is considering or will be taking?

CTR authorizes either the districts or CARB to enforce the reporting requirements. CARB is working closely with the districts to develop enforcement strategies. It is very important to take consistent enforcement actions across the districts (large districts vs. medium/small/rural districts) and within the districts (large facilities vs. small facilities). The districts could send out notices to comply (NTC) before issuing notices of violation (NOV) as well as incorporating CTR information into permit application and renewal processes. Non-compliant facilities may be subject to financial penalties pursuant to the Health and Safety Code section 42400 et seq. We want to minimize impact on small business operations while enforcing the CTR regulation.

Can my facility get an extension to the reporting deadline?

Extensions to the air district reporting deadline are at the discretion of the air districts.

I’m having trouble reporting through the air district’s reporting tool. Can I get some help?

Please contact your air district for assistance with reporting through the data reporting tool.

Facility Applicability Questions

What are the three core applicability criteria under CTR?

Pursuant to section 93401(a), the three core applicability criteria apply to the following facilities.

- **GHG Facility:** A facility that is required to report to the CARB MRR program.
- **Criteria Facility:** A facility that emits more than 250 tons of any applicable nonattainment pollutant or its precursors during the data year.
- **Elevated Toxics Facility:** A facility that is categorized by the local air district as high priority for toxic air contaminant emissions at the beginning of the data year.

If there are multiple “facilities” at one location, how is reporting applicability determined? Who is required to report data?

Examples of multiple facilities at one location include but are not limited to:

1. An agricultural facility with permitted equipment leases a portion of their acreage to a separate business entity (creating a separate facility with the same street address). The second facility operates its own permitted equipment on the leased property.
2. A petroleum refinery has a hydrogen production facility on site that is owned and operated by an independent company with its own permits.
3. A strip mall leases space to multiple facilities (e.g., an auto body shop, a dry cleaner, and a grocery store). The individual businesses operate devices and processes that are permitted by the local air district. The independent businesses (facilities) have the same street address but with different “Suite” numbers, and each has permits issued to the business operator.
4. A gas station has permits issued to the current owner/operator. A third-party contractor operates a permitted soil vapor extraction system on-site to treat sub-surface contamination, which is the responsibility of the previous facility owner.

In all situations, the entity to which a permit is issued has the primary responsibility for reporting emissions or activity data associated with that permit to the local air district. Under the CTR, both the facility owner and facility operator have a legal obligation to report data according to the CTR requirements if the entity (“facility”) meets any of the CTR applicability criteria. However, this generally applies to the owner or operator of the permitted devices and processes, and not necessarily the landowner. Either the equipment owner or the equipment operator (if different) can comply by reporting data; there is no need for both to report (if the owner and operator of the devices are different entities). A permit holder is not required to collect or report emissions from sources for which a permit has been issued to a different person or business entity. If two or more facilities occupy the same space, it is possible that one facility would be subject to reporting, and the other(s) would not.

In cases where the reporting obligation is ambiguous or in dispute, the local district and/or CARB can provide guidance as to who must report data. Under the AB 2588 Toxic Hot Spots regulation, districts have the discretion to consider multiple emission sources, facilities, and business entities when determining actions that must be taken in response to human health risks from single facilities or cumulative risks from multiple facilities.

Do air district-permitted non-retail fuel dispensing facilities need to report under CTR (assuming no other emission sources at that facility)?

Non-retail fuel pumping equipment does not trigger reporting applicability under CTR; the permitted process criterion for fuel dispensing facilities is for retail gasoline pumping only. If there are no other permitted devices or processes at the facility (and the facility does not exceed four tons of criteria pollutant emissions), then the facility is not subject to reporting under CTR. As a benchmark, if one uses the quantification *method* for gasoline dispensing developed by CARB and the California Air Pollution Control Officers Association (CAPCOA),

hypothetically one would need to dispense over 8.6 million gallons of gasoline to emit four tons per year of volatile organic compounds (VOC).

Retail gasoline dispensing facilities are subject to CTR in Phase 2 of the phase-in schedule, but facilities emitting over four tons of criteria pollutants are in Phase 1. How can I tell if my gas station emits over four tons of VOCs?

As a general threshold, if a retail gas station dispenses more than 8.6 million gallons of gasoline in a year, the facility may emit greater than four tons of VOC per year.³

Auto body shops are in Phase 2. If an auto body shop also has a diesel-powered backup generator (which are subject to reporting in Phase 1), in what Phase is the facility required to report? What if the auto body shop is over four tons of VOC emissions per year?

If the auto body shop has a permitted diesel-powered backup generator or has over four tons of criteria pollutant emissions (including precursor VOCs), the facility is subject to CTR reporting in Phase 1 and must report emissions from all permitted devices and processes. Previous reporting shows that 99% of California auto body shops emit less than four tons of VOC.

Use of PCBTF is a Phase 1 category, but auto body shops are in Phase 2. Recently it was made clear that many auto body coating materials contain PCBTF. If an auto body shop uses coatings with PCBTF, are they in Phase 1?

The use of parachlorobenzotrifluoride (PCBTF) in auto body repair and coating operations is not reported with Phase 1 of CTR reporting (Sector 15) – the auto body shop would begin reporting with Phase 2 under Sector 28.

A waste handling/treatment facility is subject to Phase 3B, but it has permitted devices or processes operating on site that meet the three core applicability criteria or that are subject to Phases 1, 2, or 3. When does the facility need to report?

Under the original 2018 CTR regulation, if a facility is considered a “GHG Facility”, Criteria Facility”, or “Elevated Toxics Facility”, the facility must report its emissions annually, using best available data and methods. This is regardless of the “type” of facility. For waste handling/treatment facilities, those best available data and methods are expected to include emission factors determined from previous source testing, until newer pooled source testing data comes in through the requirement of the EICG regulation. The two-step process (qualitative screening followed by quantitative testing) applies to the following waste handling/treatment facilities in Phase 3B: landfills (Sector 48), composting facilities (Sector 49), material recycling/recovery facilities (Sector 50), metal shredding and dismantling

³ This threshold is based on South Coast Air Quality Management [District’s Guidelines for Fuel Dispensing Operations](#), Revised December 2022). This threshold may vary by district.

facilities (Sector 51), and wastewater treatment plants including publicly owned treatment works (Sector 52).

If the waste handling/treatment facility is subject to CTR due to “Additional Applicability”, the facility may defer reporting until the 2028 data year (even if the facility has other equipment subject to reporting, such as an emergency generator, which would otherwise be required to be reported in 2023 for Group A districts). It is expected that when it comes time for these waste handling/treatment facilities to report, the newer source testing data will be available to estimate emissions.

In addition, the facility must comply with all reporting obligations, and those other reporting obligations may include requirements from the NEI or other air district requirements, in addition to CTR.

If a facility has a primary SIC or NAICS code that is not specifically listed in Sector Number 52, but has permitted wastewater treatment equipment/processes, can the facility still report in Phase 3B, or does it need to report earlier?

If the facility has a primary or secondary SIC or NAICS code that applies to wastewater treatment, the facility can report in Phase 3B, as long as the facility does not meet any of the three core applicability criteria.

Does the CTR apply to facilities on Tribal Lands?

CTR does not apply to facilities on Tribal Lands.

Do all the landfills report in Phase 3B, meaning they are not required to report until data year 2028?

No. If a landfill meets any of the first three core applicability criteria under CTR section 93401 (i.e., GHG Facility, Criteria Facility, and Elevated Toxics Facility) or the additional applicability criterion (four tons of any criteria air pollutant per year except for carbon monoxide in Group A districts and ten tons of any criteria air pollutant per year except for carbon monoxide in Group B districts), it needs to report emissions regardless of the sector phase.

Abbreviated Reporting Questions

If a gasoline dispensing facility (GDF) also dispenses diesel fuel, and the dispensing of diesel fuel is specifically permitted, is the GDF eligible for abbreviated reporting?

Currently as written, if the diesel dispensing equipment and emissions are permitted, then technically the facility would not qualify for abbreviated reporting. However, the petition process in 93421(b) may provide an option for including diesel dispensing under abbreviated reporting. For more information on the petition process, contact the CTR staff at ctr-report@arb.ca.gov.

Is liquified petroleum gas (LPG) considered the same as propane (for abbreviated reporting eligibility)?

Liquified petroleum gas (LPG) and propane have similar composition. Boilers, heaters, and other external combustion devices fired on LPG (as well as propane) qualify for abbreviated reporting under CTR.

Does the term “heaters” in the abbreviated reporting section only refer to “process heaters”, as defined in the regulation?

For abbreviated reporting in section 93421(a)(2), the term “heaters” is intended to be broad and include many different types of heaters (not just “process heaters”) fired on natural gas and/or propane (or LPG). Heaters such as rice dryers would qualify for abbreviated reporting in most cases, but the methods, pollutants, and emission factors for quantifying emissions for rice dryers or other specific types of heaters must be considered when estimating emissions.

If a facility engages in the activities identified as “abbreviated” sources as listed in Section 93421, does that mean the facility only needs to provide the activity data listed for those sources?

Not necessarily. Although the provisions in Section 93421 of CTR were developed to simplify data collection at some facility types, as feasible, those provisions do not override district authority to collect and report data that the district believes is necessary to implement appropriate permitting programs as well as the AB 2588 Hot Spots program. A facility is obligated to provide any throughput data or activity data requested by the district, so that the district can quantify and evaluate emissions estimates at the facility. If other emission sources, in addition to those listed in section 93421, are present at the facility, the district is authorized to collect additional information and evaluate health risks for those emissions under the AB 2588 Hot Spots program – even if the sources are not subject to permitting. Also, if the district believes it is necessary to collect information that is in addition to the activity data types listed in 93421 to properly quantify emissions, the facility must provide that additional information as requested by the district.

For abbreviated reporting in Section 93421 of CTR, the only activity data listed for reporting for agricultural operations is “Quantity of head of cattle,” but the CTR definition for “Agricultural operations” is broader and includes the production of crops and raising other animals or fowl. What exactly needs to be reported if the operation has sources other than cattle, and does the facility still qualify for abbreviated reporting?

If the facility is an “agricultural operation,” as defined in the CTR, and has any combination of the activity data types specifically listed in Section 93421, the facility may report activity data as described in that section and participate as an abbreviated reporter. If there are additional permitted processes or devices at the facility for which emissions data need to be estimated and reported, CTR requires that additional information (emissions or appropriate activity

data) be provided as requested by the air district. A facility should work with their local air district to request that additional source types be included as abbreviated sources for one or more facilities within the air district pursuant to the petition process in 93421(b).

Quantification Methods and Reporting Questions

How should emissions from dry cleaners be quantified?

Historically, air districts have often reported criteria pollutant (including precursor VOC) emissions from multiple dry-cleaning operations as aggregated emissions (not facility-specific). Also, non-perchloroethylene dry cleaners typically screen out of the AB 2588 Hot Spots program, so toxics emissions from dry cleaning operations have not been routinely reported. CTR requires facilities to report criteria pollutant and toxic air contaminant emissions from permitted dry-cleaning facilities, on a facility-specific basis. Dry cleaners are in Phase 1 of CTR/EICG, and they are required to report both criteria pollutant (including precursor VOC) and toxics emissions, even if they do not use perchloroethylene. [USEPA AP-42](#) provides a compendium of emissions estimation methods and emission factors, including for dry cleaning. [The San Diego County Air Pollution Control District](#) has also posted a method that the district uses for estimating dry cleaning emissions. Ideally, Material Safety Data Sheets (MSDS) for the cleaning solvents used by individual dry-cleaning operations can be consulted to identify and quantify estimates of toxics emissions, however, the use of other reasonable approaches, including default toxics speciation profiles, is not prohibited by CTR.

When do emissions from portable engines need to be reported, and by whom? How should emissions from portable engines be quantified?

As noted above in this FAQ document, CTR requires emissions from the use of portable diesel-powered engines over 50 brake-horsepower to be included in the facility emissions report, but only for two categories of facilities: facilities that report GHG emissions to the CARB MRR program, and facilities that are permitted to emit over 250 tons of a nonattainment criteria pollutant (or its precursors). The intent of the CTR requirement to report emissions of such engines at these facilities is to capture the diesel engine particulate matter emissions occurring at these facility locations, so that the emissions can be included in the evaluation of health risks to nearby residents from diesel particulate matter. Diesel particulate matter emissions can be a significant source of cancer risk at these facilities due to heavy construction and maintenance activities, and because the engines may not be owned and operated by the facility, the emissions from these engines have been historically excluded (in some cases) from facility emissions reports and health risk considerations.

The CTR requirement is for facilities in these two categories to include criteria pollutant and toxics emissions from portable diesel engines over 50 brake-horsepower in their emissions report. This applies regardless of the ownership or permit status of the engines. Engines that are owned and/or operated by contractors, as well as non-permitted engines are included. Because the facility may not own or operate these engines, and some engines may not be permitted and thus have less documentation available, there is considerable flexibility in how the emissions may be estimated. The emissions from all portable engines may be

aggregated, if desired, and reported as a single “device” to CARB, or they may be reported individually. Also, the use of best available/engineering estimates (including reasonable “default” values or averages) may be applied for determining engine size, Tier, emission rates/emission factors, and throughput or activity data (e.g., hours of operation or fuel use for one or more engines) used to estimate emissions.

The listed facility types (MRR, over 250 tons of criteria pollutant emissions per year) are responsible for reporting emissions from these engines that occur at their facilities, regardless of ownership or permit status. Businesses that own and rent such engines, or that operate engines for clients contractually at various locations (but do not operate the engines where they are stored and when not in use), are not required to report emissions under CTR; however, some districts require such businesses (“facilities”) to provide such reports to the district, and identify the location of the emissions as “various locations,” or similar. In such cases, there is a risk that emissions could be double counted, once by the owner of the units (at “various locations”), and once by the facilities that are required to include emissions from these units at their specific facility. CTR staff will study and monitor this situation to determine the relevance that any double counting may have, especially with respect to criteria pollutant emissions.

How should emissions from wastewater treatment plants be quantified?

CARB is working closely with the California Association of Sanitation Agencies on the two-step process for pooled source testing including qualitative screening and quantitative sampling and analysis. The method is expected to be developed and finalized before wastewater treatment plants are required to report emissions.

Are there any statewide methodologies to quantify emissions from some of the industry sectors to satisfy CTR reporting requirements, especially for air toxics?

CTR does not currently establish prescribed uniform methods for estimating emissions. Instead, CTR requires the use of “best available data and methods”. CAPCOA has convened an Emission Reporting Uniformity Workgroup to develop uniform methods for different sectors including power generation, landfills, refineries, and oil & gas. They are also developing an Air Toxics Emission Factors Clearinghouse as well as industry-wide guidelines for diesel engines and auto body shops. CARB will continue to work closely with CAPCOA to develop statewide methodologies and post them on our website such as the [Gasoline Service Station Industrywide Risk Assessment Technical Guidance](#).

CTR Reporting Timeline and Phase-in Schedule Question

When will those facilities in different phases be required to report data under CTR?

The table below illustrates the phase-in schedule for different facility categories over the next few years. The five sectors of waste handling/treatment facilities in Phase 3B include landfills

(Sector 48), composting facilities (Sector 49), material recycling/recovery facilities (Sector 50), metal shredding and dismantling facilities (Sector 51), and wastewater treatment plants including publicly owned treatment works (Sector 52).

District Group	Facility Category	Data Year						
		2022	2023	2024	2025	2026	2027	2028+
A	>4 tpy	X	NNR	NNR	NNR	X	X	X
	Phase 1	X	NNR	NNR	NNR	X	X	X
	Phase 2			X	NNR	X	X	X
	Phase 3				X	X	X	X
	Phase 3B							X
B	>10 tpy			X	NNR	NNR	NNR	X
	Phase 1			X	NNR	NNR	NNR	X
	Phase 2					X	NNR	X
	Phase 3						X	X
	Phase 3B							X

NNR = No new CTR reporting requirements; follow existing reporting requirements (e.g., district, NEI).