

CARB Work Plan for Review of SDAPCD Program

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I. Goals of Review

The goal of the San Diego Air Pollution Control District (San Diego or District) Program Review is to meet the requirements of AB 423 (Gloria) by evaluating key District programs (engineering, regulatory, compliance, planning, monitoring, and incentives), and look for areas for potential improvement. To accomplish this goal, CARB staff will assess San Diego's rules, policies, and practices in these program areas, and compare the District's regulations, policies, and programs to those in other air districts, as well as CARB recommendations. This review is focused on, but not limited to, calendar years 2013 – 2018.

II. Schedule

Date	Milestone
September 2020	Draft Work Plan
October 2020	Meet with District
November 2020	Public Workshop
November 2020	Data Requests
May 2021	Issue Draft Report
May 20201	Public Workshop
June 2021	Board Meeting

The completion of work in some program areas is dependent on the ability to travel in the fall. With limited travel due to Covid issues, alternatives will be considered in the event that travel is limited.

III. Methods

Determining the SDAPCD's performance in each program area will require understanding both the implementation of the District's programs, and the implementation of similar programs at other districts. Towards that end, staff's analysis will encompass multiple air districts, including (but not limited to) San Joaquin Valley APCD, Bay Area AQMD, and South Coast AQMD.

Staff will rely on four methods for this review:

- Evaluation of specific facilities in San Diego and other air districts
- Evaluation of specific program, policy, and regulatory documents in the San Diego air district, and comparison to similar documents in multiple air districts
- Data collection from San Diego, as well as San Joaquin, Bay Area, and South Coast and perform a comparison between air districts

IV. **Public Process**

1. Comments on work plan: Draft work plan distributed for comment, CARB will address comments prior to holding public workshop
2. Public workshop: CARB will hold a public workshop to present the draft work plan, and solicit further input on the scope of the review and individual facilities to consider in the evaluation
3. Finalize work plan: CARB will address workshop comments, finalize, and publish the work plan to our website.
4. Draft final report: CARB will hold a public workshop, and offer individual meetings to stakeholders.
5. Public Workshop: CARB will hold a public workshop to present draft results of the review.

V. **Facility Selection Criteria**

The District has approximately 4,000 permitted facilities within the District which includes approximately 30 federally major (Title V) facilities, with all of these facilities collectively holding approximately 7,000 district permits. CARB staff will review 50 facilities for permitting and compliance purposes. Every effort will be made to review the same 50 facilities in all program areas, where possible.

Selection within the following categories should reflect (as much as possible) a balance between Title V facilities and non-Title V facilities such that both types are reflected within the group analyzed. We will consider facilities with significant impacts due to toxic or criteria pollutant emissions.

1. Facilities located within Environmental Justice communities
2. Facilities within any of the CalEPA initiative categories: oil and gas, landfill/composting, and metal shredding

CARB staff will select the remainder of facilities at random to reflect a broad mix of typical facilities within the District. Additionally, CARB staff will select several asbestos and agricultural burn inspections to evaluate during District visits.

VI. **Program Area Assessment**

This review will focus on many different project areas including:

1. Emission Inventories and Air Toxics

2. New Source Review and Permitting
3. Prohibitory Rules and RACT/BARCT requirements
4. Enforcement
5. Monitoring
6. Incentives
7. Statistical Comparisons
8. Transparency and Information Communication

1. Emission Inventories and Toxic Air Contaminant Program Requirements

CARB staff will review facility files, district databases and documents, and interview District staff in an effort to address the following topics:

- a. Tools used to quantify, report, and archive emission data. Emission factors used.
- b. Frequency of obtaining, reviewing, and reporting emission inventories from permitted sources.
- c. Emission data from industrywide sources—evaluate how this is quantified and reported.
- d. Compliance with the AB 2588 Air Toxics “Hot Spots” Program requirements, specifically in the areas of inventory development and prioritization, health risk assessments (HRA) (including air dispersion modeling), public notification, and Risk Reduction Audit and Plan.
- e. HRA’s are conducted in compliance with the 2015 OEHHA HRA guidance methodology.
- f. Compliance with CARB guidance for reporting emissions and additional data (e.g. stack parameters) that are needed for air dispersion modeling and risk assessment.
- g. Timeliness and adherence to methodology of emission inventories and health risk assessments.
- h. CEQA comments: industrial and goods movement projects.

2. Permitting and New Source Review

CARB staff will review district ATC and ERC engineering evaluations and facility permits, as well as district rules and policies, in an effort to address the following topics:

- a. Accuracy, clarity, completeness, and transparency of engineering evaluations and permits.
- b. Documentation of decisions, including rationale for those decisions.
- c. Accuracy of emission calculations and emission factors.
- d. Inclusion of all applicable federal, state, and local requirements.
- e. Accuracy of California Clean Air Act equivalency demonstration.
- f. ERCs granted in accordance with all applicable regulations and policies.
- g. Consistency in application of the District's permitting program.
- h. Legality and consistency of district regulations and policies.
- i. Application of BACT to both minor and major sources, including adherence to Federal and state requirements, as well as District policies.
- j. Public notice requirements.
- k. Enforceability of permit conditions.

3. Planning and Rules

CARB staff will review the district planning and rule development activities in an effort to address the following topics:

- a. Rule development policies and procedures.
- b. Rule development staff report accuracy and thoroughness.
- c. Rule development public process.
- d. CEQA procedures.

4. Enforcement

CARB staff will review enforcement at a programmatic level by reviewing policies pertaining to inspections, investigations, and settlements; and at a facility-specific level will examine enforcement practices and facility compliance levels, to address the following topics:

- a. Facility compliance rates.
- b. Documentation of investigations and inspections.
- c. Training and knowledge of enforcement staff.
- d. Source test evaluations.
- e. Notice of violation and case resolution procedures.
- f. Consistent penalty assessment.
- g. Handling of minor violations.
- h. Case closure rates.
- i. Enforcement of asbestos abatement requirements.
- j. Enforcement of agricultural burn requirements.

- k. Implementation of variance and hearing board procedures and consistency with District rules and State law.
- l. Timeliness and effectiveness of actions to address complaints.

5. Air Monitoring

Because CARB has a regular air monitoring evaluation program, air monitoring will not be a focus of this review. However, CARB staff will write a summary of findings from previous audits, and compare the District's results relative to that of other districts.

6. Incentives

Staff will implement its regular fiscal and programmatic audit procedures of the District, and publish results as part of its regular audit program. A summary of those findings will be included in this report.

7. District Statistical Comparison

CARB staff will establish a list of metrics to compare the performance of the District to districts of comparable size and complexity. These metrics will include permit fees and revenue, staffing levels by program, number of permits issued, number of regulated facilities, and other metrics designed to determine if the District is staffed adequately, collecting sufficient revenue to implement district programs, and performing its mandated duties in an appropriate manner.

8. Transparency and Information Communication

CARB staff will evaluate the transparency of all programs evaluated, including the method in which information is communicated to the public and how clear and accessible that information is.