

Program Review of the San Diego Air Pollution Control District

Enforcement Division
June 2021



Introduction

- California Air Resources Board (CARB) staff is reviewing the San Diego Air Pollution Control District (District)
- CARB recently published an interim report discussing CARB staff's progress on the review
- This workshop is to present the interim report and answer any questions on the review

CARB's Responsibilities

- CARB leads California's fight against air pollution and climate change, protects public health, and promotes clean, energy-efficient fuels and technology



Photo Source: SDAPCD 2020 Kids Calendar Contest Entry

Air Pollution Basics

- Air pollutant emissions impact the health of Californians and damage the environment
- Federal and State law have established air quality standards
- Areas above the air quality standards are referred to as “non-attainment” areas
- Attainment status drives regulatory planning
- Federal, State, and local rules require many sources of air pollution to be permitted

Air Pollution Sources

STATIONARY



Drycleaners



Factories



Refineries



Power plants

HOUSEHOLD



Fireplaces



Consumer products



Stoves



Cars



Trucks



Buses



Trains



Planes

MOBILE



Animals



Dust



Wildfires

NATURAL

Reducing Air Pollution

Federal



U.S. EPA

Sets/enforces national air quality standards. Regulates interstate transportation.



Trains



Ships



Planes

State



CARB

Regulates mobile sources of air pollution, greenhouse gases, and consumer products. Reviews air district programs.



Cars



Trucks



Buses

Local

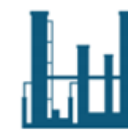


Local Air Districts

Regulate stationary and local sources of air pollution.



Factories



Refineries



Residential woodstove

CARB's Role

- CARB coordinates attainment efforts
- CARB staff provide support and review air district programs
 - Rules and regulations
 - Permitting
 - Inventory and Air Toxics "Hot Spots" Program
 - Monitoring activities
 - Compliance and enforcement
 - Incentives

Assembly Bill 423

- Assembly Bill 423 (AB 423) was enacted in October 2019
- Requires District changes
 - Restructures the District governing board
 - Enhances public information, participation, and reporting
 - Requires an evaluation of need to adopt additional regulations
 - Expands the air monitoring and incentive programs
 - Updates the public complaint process
- AB 423 requires CARB to perform a review of the District

CARB Staff's Work Plan

- Identify and evaluate key District programs, policies, and practices
- Determine if programs meet legal requirements
- Review program implementation
- Review specific facility data across a variety of emission sources
- Compare programs and implementation with other districts
- Make recommendations for program improvements

General AB 423 Progress

- The new District governing board is in place
- The District is actively working on AB 423 commitments
- CARB staff has completed several components of the District review and is formulating recommendations
 - Work plan including objectives of the review
 - Metrics for evaluation
 - Program policy documents
 - Facility documents

Final Report and Interim Report

- CARB's review has been significantly impacted by COVID-19
 - A major component of the audit involves facility inspections
 - Adjustments to normal District operations
 - Documents needed to be electronically transferred
- The publish date for the final report has been extended
- The interim report outlines CARB's review methods and progress

Interim Report Goals

- Provide a detailed update on the work CARB has completed on the review
- Give background on air pollution program implementation
- Summarize District specific programs
- Explain CARB staff's review method and evaluation metrics
- Identify key issues
- Provide a roadmap for the remainder of the review

San Diego Air District

- Covers all of San Diego County
- Both the San Diego Air Basin and a portion of the Salton Sea Air Basin
- Second largest county in CA
- Fourth largest population



Photo Source: Annual Air Quality Monitoring Network Plan 2019, SDAPCD, June 30, 2020

San Diego Air Quality

- Non-attainment for ozone and particulate matter
- Ozone is improving
- Air quality is still a concern in disadvantaged communities

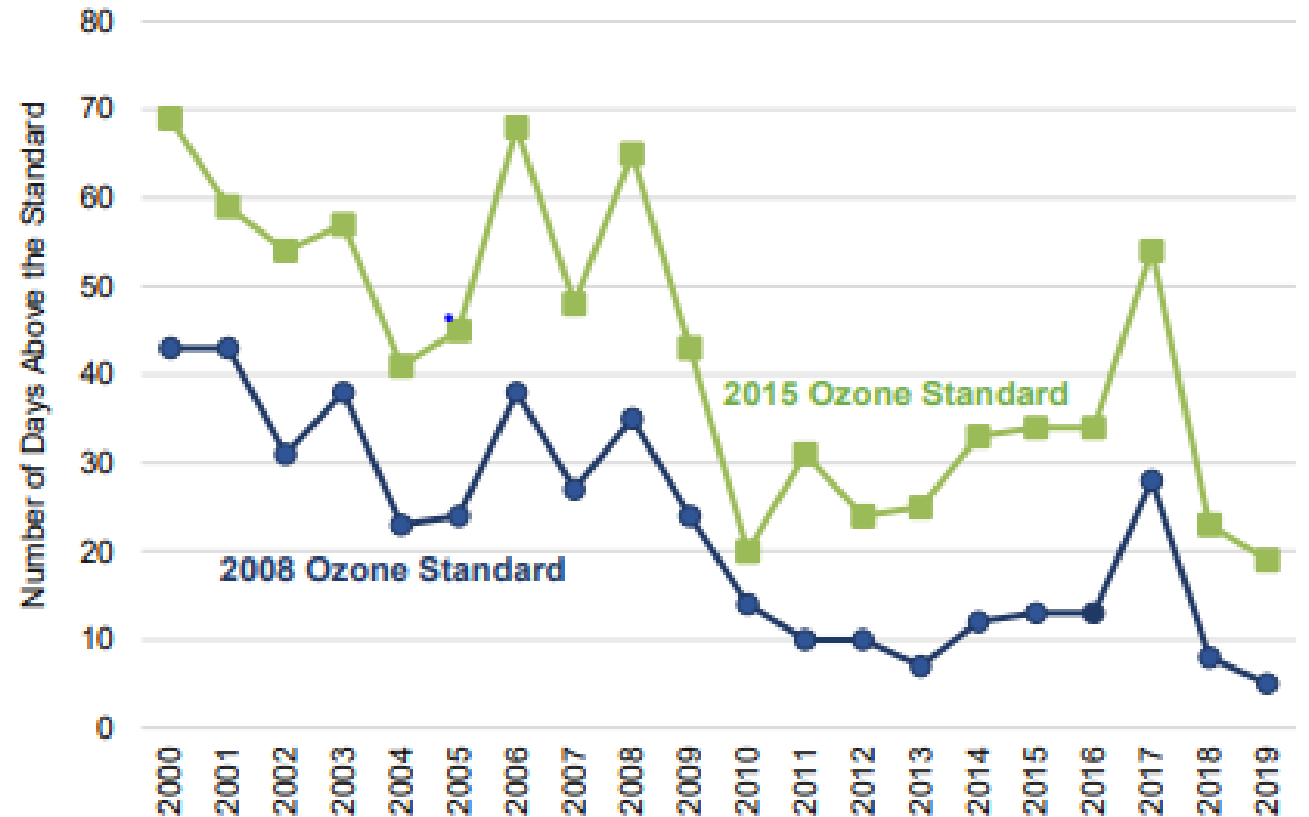


Figure Source: 2020 Plan for Attaining NAAQS for Ozone in San Diego County, October 2020

Program Review

- Air Monitoring
- Emission Inventories
- Air Toxics “Hot Spots”
- Rules and Planning
- Permitting and New Source Review
- Compliance and Enforcement
- Incentives

Ambient Air Monitoring

- The District operates nine ambient air quality monitoring stations and has two stations under construction
 - Located throughout the county
 - Measure various criteria air pollutants and toxic compounds
- Data is reported to CARB and the U.S. EPA
- Data is used to determine regional ambient air quality trends

Ambient Air Monitoring Evaluation

- Air quality monitoring equipment calibration and instrument audits
- Monitoring station data completeness/missing data
 - Routine verifications
 - Quality control
 - Maintenance
 - Calibration frequency
- Proper siting of monitoring stations
- Development of the monitoring plan

Emission Inventories and Health Risk Assessment

- Emission inventories provide an estimate of the amount of pollution emitted
- The District collects data on stationary source, mobile, natural, and other sources of emissions
- Agencies use emission inventories to determine appropriate approaches to managing air quality
- The District assesses potential health risks from emission data

Emission Inventory Evaluation

- District practices regarding the collection, reporting, quality, and availability of inventory data
 - Consistent and compliant emission calculations
 - Compliant reporting requirements
 - Reporting frequency
 - Enforcement of practices
 - Emission data updates
 - Program resources

Health Risk Assessment Evaluation

- CARB staff is reviewing District compliance with Air Toxics “Hot Spots” program requirements
 - Timeliness
 - Appropriate OEHHA methodology
 - Compliant noticing
 - Compliant risk reduction audits
 - Adequate annual reporting and distribution

Rules and Planning

- The District uses emission inventory data to determine short- and long-term plans to address non-attainment
- The District adopts and enforces rules to control local sources of air pollution
- The District has over 150 rules
 - Establish permitting programs
 - General or apply to specific industries or equipment
 - Achieve emission reductions by setting emission standards

Rules and Planning Evaluation

- CARB staff is reviewing
 - Policies and procedures
 - Staff reports
 - Public processes
 - District CEQA procedures
- Evaluation Metrics
 - Outreach methods and public process
 - Frequency of updates
 - Air quality progress
 - Sufficiency of resources

Permitting and New Source Review

- Stationary sources of air pollution are permitted according to the NSR regulations
- The District issues permits prior to constructing or modifying equipment
- The District performs completeness determinations, engineering evaluations, and rule analyses
- Permits include both general conditions and specific conditions of operation

Permitting and NSR Evaluation

- CARB staff is reviewing
 - Documentation of decisions
 - Consistency in application
 - Legality and adequacy of regulations and policies
- Evaluation Metrics
 - Timeliness of permitting issuance
 - Accuracy of engineering documents
 - Quality of permits
 - Transparency of procedures

Enforcement

- The District ensures compliance with federal, State, and local air pollution regulations
 - Reviews facility permits
 - Performs facility inspections
 - Responds to complaints
 - Reviews facility records
 - Issues warnings and notices of violation
 - Assesses penalties
 - Provides compliance assistance

Enforcement Evaluation

- CARB staff is reviewing
 - Policies on inspections including inspector conduct
 - Rule specific compliance and enforcement policies
 - Violation issuance and settlement
- Evaluation Metrics
 - Frequency of inspections
 - Complaint response time
 - Violation issuance and resolution
 - Emission source test review and enforcement

Incentives

- The District offers a range of incentive programs for businesses, community members, and local government
- District incentive programs with CARB administration authority
 - Carl Moyer
 - CAP Incentives
 - Goods Movement Program
 - FARMER Program

Incentives Evaluation

- CARB staff is using CARB fiscal and programmatic audit procedures for the District
- Evaluation Metrics
 - Consistent program implementation
 - Program effectiveness
 - Public transparency and accountability
 - Collaboration
 - Program development

Key Issues and Public Concerns

- The District is working cooperatively with CARB staff to identify issues that warrant further evaluation
- CARB staff reviewed background documents including findings from the State Auditor
- Key Issues
 - Transparency
 - Complaint response
 - Welding emissions and regulation
 - Air Toxics "Hot Spots" program
 - Incident Air Monitoring

Next Steps and Revised Timeline

- Complete the evaluation of District policies and facility specific data
- Inspect select facilities
- Plan to publish findings in the Spring of 2022
 - Publish a draft of the final report
 - Hold a public workshop to discuss findings
 - Review and respond to comments
 - Present the final report to the CARB Board
 - Report to legislature

Contact Us

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Comments

- We want to hear your questions, thoughts, and comments
 - Please press the Zoom “raise hand” button and staff will call on participants by name
 - We will prompt the telephone participants to comment after all Zoom participants’ comments have been received
 - Press *6 to unmute