



San Diego County Air Pollution Control District

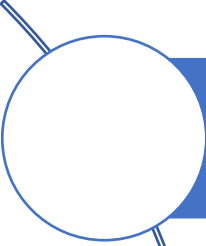
EMISSION INVENTORY FEE PROPOSAL

Public Workshop – October 27

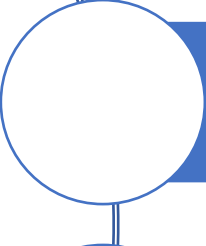
2025



Outline



Overview of Emission Inventory Program



New Emission Inventory Requirements



Emission Inventory Fee Proposal



Questions/Feedback



Emission Inventory

Requirements

- Federal, State and Local Rules Require Emission Inventory Reports.
 - Federal: Clean Air Act
 - State: Criteria Toxics Reporting (CTR) & AB2588 'Hot Spots'
 - Local: SDAPCD Rule 19.3

Purpose

- Quantify air emissions for sources we regulate.
- Emission data identifies sources of emissions that may contribute to adverse health risks or other impacts at the local and statewide levels.



Emission Inventory Requirements

Criteria Emissions Inventory (CEI) (Rule 19.3)

- Requires emissions of CO, Pb, NO_x, PM, SO_x or VOC for any facility which emits 5 tons or greater of VOCs or NO_x per year or in excess of thresholds stated in the District Community Air Protection Program.

Toxic Emissions Inventory (TEI) "Hot Spots" Program (CARB AB2588)

- The Toxics Emissions Inventory or "Hot Spots" Program requires toxic air contaminants emissions and creation of health risk prioritization scores

Criteria Pollutant and Toxics Emission Reporting (CARB CTR)

- Requires emissions from facilities subject to the general applicability, § 93401(a), of CTR Regulation.

Emission Inventory Requirements

200 Annually

Historical Number of Inventories (prior to 2022)



4,500 Annually

After Phase-In of Adopted State Mandates

2022

~3,700 Permits

- 250 new Toxic Air Contaminants required to be evaluated.

2024

~1,500 Permits

2025

~1,300 Permits

2026

Accumulated ~6,500 Permits annual reporting

- 780 new pollutants in data year 2026

2028

~20 Permits

Emission Inventory Program Expansion

Increased the Emission Inventory Team

Amended District Rule 19.3 to streamline emission data submittal

Enhanced Emission Inventory System (EIS) to streamline development of emission inventory reports

Implemented a Time and Material fee in January of 2025 applicable to facilities that have been historically inventoried (~200).



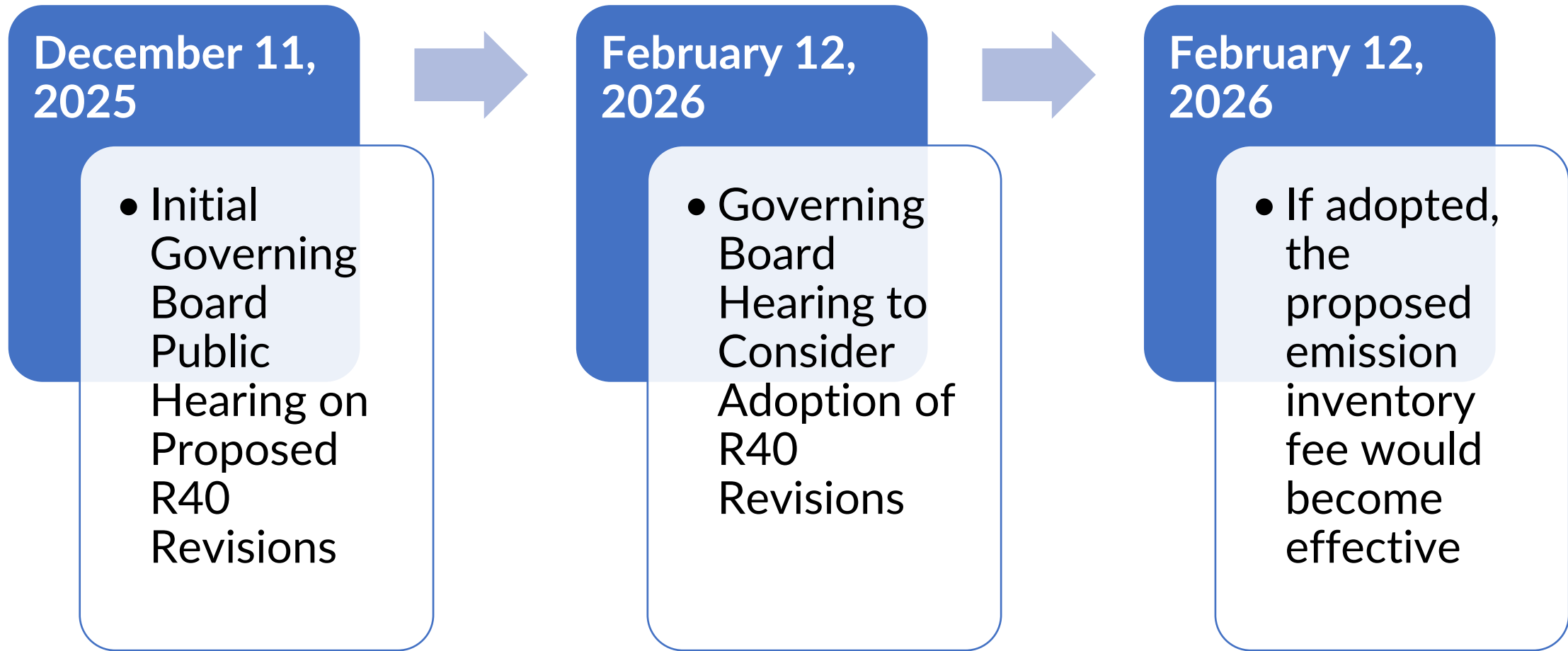
Proposed Emission Inventory Fees

Proposed Requirement

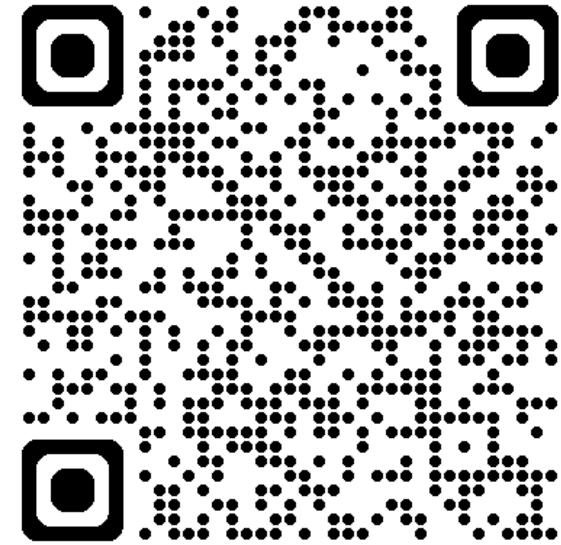
- The owner or operator of any facility subject to one of the following requirements **shall pay a fixed fee of \$259 for preparation and revision of an Emissions Inventory Report** (State 17 CCR, Section 93400 et seq.):
 - Subsection (c)(1)(iii) of District Rule 19.3, as specified in the AB 2588 Air Toxics "Hot Spots" Emission Inventory Criteria and Guidelines Regulation (EICG Regulation) - Appendix E requirements for Smaller Facilities,
 - Subsection (c)(1)(iv) of District Rule 19.3, or
 - Subsection (c)(1)(v) of District Rule 19.3, as specified in Section 93401(a)(4), Additional Applicability of Criteria Air Pollutants and Toxic Air Contaminants



Next Steps for Current Proposal



Feedback



<https://www.sdapcd.org/content/sdapcd/rules/workshops.html>

We welcome your input

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