



# COMPREHENSIVE EMISSION INVENTORY GUIDELINES

**MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT**  
**BRAD POIRIEZ, EXECUTIVE DIRECTOR**  
14306 Park Avenue, Victorville, CA 92392-2310  
760.245.1661 • [www.MDAQMD.ca.gov](http://www.MDAQMD.ca.gov) • @MDAQMD

What's New  
for the 2023 Emission (Data) Year Submissions

**Regulation for Reporting Criteria Air Pollutants and Toxic Air Contaminants (CTR)**

CARB developed the "Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants" (or CTR) to implement statewide annual reporting of criteria air pollutant and toxic air contaminant emissions data from facilities. This reporting regulation became effective January 1, 2020, with an amendment effective January 1, 2022. A facility is subject to the emissions reporting requirements of CTR if they meet the applicability criteria in items 1-4, below:

- 1) The facility is required to report greenhouse gas (GHG) emissions to the California Air Resources Board (CARB), for the data year, pursuant to Health & Safety Code, Section 38530; or,
- 2) The facility has the authority to emit more than 250 tons per year, during the data year, of nitrogen oxides, volatile organic compounds, particulate matter, sulfur oxides, ammonia or lead; or,
- 3) The facility is categorized by the District as a high priority for toxic air contaminants at the beginning of the data year; or,
- 4) The facility exceeds any of the following thresholds;
  - a) a potential to emit 10 tpy of any criteria pollutant (except for CO), or,
  - b) a potential to emit 100 tpy CO, or
  - c) is engaged in a process permitted by the District that has an activity level meeting or exceeding the CTR reporting threshold. Reporting is phased in dependent on activity.

Facilities subject to items 1-3 above, must report all emissions and data parameters as specified in the CTR Regulation under 17 CCR 93404 (e.g. NAICS codes, latitude/longitude, device and process information, etc.)

Facilities subject to items 4(a) and (b), above, are subject to initial reporting commencing with emission year 2024. For facilities identified in item 4(c) above, initial reporting is carried out in phases, commencing with emission year 2026. Ongoing reporting for all CTR subject facilities commences with emission year 2028.

**Additional Substances:**

Reporting commences with emission year 2024 for substances listed in Table B-2 and emission year 2028 for substances listed in Table B-3 and B-4. The substances listed in CTR Regulation Table B-2, Table B-3, and Table B-4 must be reported in addition to those substances identified in Appendix A-I of the Emission Inventory Criteria and Guidelines for the Air Toxics "Hot Spots" Program, version effective September 26, 2007, as issued by CARB.

**Abbreviated Reporting [17 CCR 93421]:**

Several facility types permitted with the District are eligible for abbreviated reporting. These facility types are stand-alone emergency generators, retail fuel dispensing, stand alone natural gas or propane boilers or heaters, crematories, and construction aggregates (does not include hot asphalt).

**Cessation of Reporting [17 CCR 93401(c)]:** Any facility no longer meeting the applicability criteria in items 1-4 above may cease reporting predicated on the facility submitting detailed written request notification (93401(c)) to the District and CARB prior to February 28<sup>th</sup>, of the year in which the emissions report is due.

Please refer to the Final Regulation Order for full requirement details:

[https://ww2.arb.ca.gov/sites/default/files/2022-02/Unofficial%20CTR\\_Jan2022\\_0.pdf](https://ww2.arb.ca.gov/sites/default/files/2022-02/Unofficial%20CTR_Jan2022_0.pdf)

### **AB 2588 Air Toxics "Hot Spots" Emission Inventory Criteria and Guidelines Regulation (EICG)**

The California Air Resources Board (CARB) adopted amendments to the existing EICG at the November 19, 2020 Board meeting. Following the adoption, the Board directed CARB staff to consider further modifications to the EICG. These modifications were approved and are effective March 21, 2022.

Amendments to the EICG focus on updating the following areas of the air toxics emission inventory:

1. Added more than 900 new substances and 3 broad functional groups (compounds associated with having greater adverse health effects)
2. Update screening approaches for diesel engines and other modeling (i.e. AERMOD)
3. Can require additional source testing for certain sectors
4. Better harmonization between CTR and EICG reporting requirements
5. Reporting of amount used or produced when emission quantification method is not available

### **Fugitive Emissions**

The scope of reporting of fugitive emissions has been updated in Section V.

### **Mobile Source Emissions**

Facilities must report mobile source emissions and/or fugitive dust from mobile sources with the emission year 2023 data. This update aligns District reporting with recent CARB EICG amendment approval. Please page 7 of this guidance for more detail on Mobile Source Emissions.

### **Reporting of Diesel Particulate Matter (DPM)**

Emissions of Diesel Particulate Matter (DPM) should be reported as one pollutant only using the Pollutant ID 9901 for Diesel Exhaust PM. Do not report DPM as its individual components, i.e. formaldehyde, acrolein, mercury, nickel, etc. as this can over estimate emissions.

### **Reporting Condensable PM<sub>2.5</sub>**

It is now required to report condensable PM<sub>2.5</sub> per the *Fine Particulate Matter National Ambient Air Quality Standards: State Implementation Plan Requirement of 2016* under the Air Emission Reporting Rule (AERR). Instructions on reporting condensable PM<sub>2.5</sub> may be found on page 8 of this guidance. The complete text of this rule is available at:

<https://www.gpo.gov/fdsys/pkg/FR-2016-08-24/pdf/2016-18768.pdf>

### **Ammonia and Lead:**

Note that commencing in emission year 2019, please report ammonia (NH<sub>3</sub>) and lead (Pb) emissions with both criteria and toxic pollutant codes. CARB has assigned new pollutant codes for ammonia (NH<sub>3</sub>) and lead (Pb) for the criteria reporting side. The new criteria pollutant codes are 42604 for ammonia (NH<sub>3</sub>) and 12128 for lead (Pb), and the previously used pollutant codes (7664417 and 7439921) are only valid on the toxic reporting side.

### **Best Practices for Estimating Emissions:**

When calculating emissions, the most representative data for emissions generated from the source must be used. The source of all emission factors must be clearly stated within **both** the CEIP (if applicable) and the CEIR. Sources must be defensible, and the following hierarchy, as recommended by EPA, should be adhered to:

1. Continuous Emissions Monitoring (CEM) data, as collected from the source;
2. Current stack testing data from the source:
  - a. In the absence of CEM data, the most current performance test results are the District's second preference for emissions data. The results from the source test must be included with the CEIP/CEIR submission—references to source testing without the complete source test report are unacceptable and may be subject to rejection.
3. Vendor emissions guarantee:
  - a. Equipment-specific manufacturer emission guarantees are the third most preferable option in the hierarchy. Guarantee must be relative to the same model of equipment and data must be specific and quantifiable.
4. Continuous Emissions Monitoring (CEM) data from a similar source or group of sources:
  - a. CEM data from a similar source or group of sources may be acceptable when accompanied by a justification of the use of the data (i.e. similar operational function, similar raw material throughput, similar process rates, identical air pollution controls). The District reserves the right to reject data from similar sources lacking sufficient justification.
5. Material Balance:
  - a. Material balance calculations may be acceptable, provided the material inputs and outputs can be accurately characterized and quantified. Any use of capture/control/transfer efficiencies must be accompanied by a citation of the source and an explanation as to why this is applicable to the source.
6. Optical Remote Sensing:
  - a. Data obtained using measurement techniques such as differential absorption light detection and ranging (DIAL) and solar occultation flux (SOF) may be used for sources that are otherwise difficult to measure, including coke ovens, storage tanks, and wastewater treatment plants. The use of optical remote sensing data must be accompanied with sufficient information necessary to validate the data quality.
7. AP-42, California Air District Emission Factors and Industry-Derived Emission Factors:
  - a. AP-42, emission factors from California Air Districts and industry-derived emission factors should only be used when there is an absence of the emissions data listed above. AP-42 and California Air District emission factors must be cited within the CEIP/CEIR. If industry-derived emission factors are used, they must be accompanied with documentation stating how the emission factors were derived and any air agency approvals of the emission factors. The District reserves the right to reject industry-derived emission factors lacking sufficient justification.

Alternative methodologies may be considered when accompanied with justification of the proposal, but the District reserves the right to reject proposals lacking sufficient substantiation of the alternative methodology.

*Please note: References to previous District approvals, historical CEIP/CEIR submissions, or emails without accompanying documentation of both the approval and the accompanying justification of the proposed calculation methodology are not considered acceptable sources of emission estimation and may result in immediate rejection of the submission.*

## **I. PURPOSE**

This guideline establishes a uniform method for preparing and submitting a Comprehensive Emission Inventory Plan (CEIP) and Comprehensive Emission Inventory Report (CEIR) for all existing, new, or modified stationary sources of air pollution within the Mojave Desert Air Quality Management District (District). The CEIP and CEIR, which are prepared pursuant to these guidelines, should be able to satisfy all of the Federal, State, and District requirements for criteria and toxics air emission inventories from stationary sources.

For assistance with at any time with the Comprehensive Emission Inventory program, please contact your District facility engineer or the engineering department at [engineering@mdaqmd.ca.gov](mailto:engineering@mdaqmd.ca.gov) or 760-245-1661.

## **II. FEDERAL AND STATE REQUIREMENTS**

Several sections of the Federal Clean Air Act (FCAA) require the maintenance and use of emission inventory data for a variety of purposes. To improve and simplify emission reporting the USEPA has established requirements for the reporting of point, area and mobile sources emissions which is found in the Consolidated Emissions Reporting Rule, 40 CFR 51, Subpart A (67 FR 39611, 6/10/2002).

The California Clean Air Act (CCAA) (Health & Safety Code §§39000 et seq.) requires the collection and maintenance of several different emissions inventories, including a criteria emission inventory (Health & Safety Code §39607) and a toxic emission inventory (Health & Safety Code §44340). In addition, specific sources of air pollutants are required to submit a Toxic Emission Inventory Plan (TEIP) and Toxic Emission Inventory Report (TEIR) (Health & Safety Code §§44341 - 44342).

Additionally, the state's Mandatory GHG Reporting Program, consistent with the calculation methodologies in the Intergovernmental Panel on Climate Change currently govern the inventory of greenhouse gas (GHG) emissions under the Mandatory Reporting Regulation (Title 17 CCR 95100-95158).

Facilities are required to report criteria and toxic emissions data directly to the District, using these Guidelines. Certain facilities are also required to report GHG emissions data directly to CARB.

## **III. APPLICABILITY**

All existing stationary sources of air pollutants are required to periodically prepare and submit a CEIP and CEIR on a schedule prescribed by the District. All proposed new stationary sources of air pollutants are required to submit a CEIP and CEIR for the proposed new emission unit(s) in conjunction with their application for permit(s) pursuant to the provisions of the District's Permit and New Source Review Rules and Regulations. Existing stationary facilities or sources of air pollutants are required to submit a CEIP and CEIR for proposed new emission unit(s) and update their current CEIP and CEIR for modifications to existing emission unit(s) pursuant to the provisions of the District's Permit and New Source Review Rules and Regulations.

## **IV. DEFINITIONS**

For purposes of these Guidelines, the definitions contained in District Rules 102, 1301, and 1520 and apply unless otherwise defined herein.

Existing Stationary Source - Any Facility or Emissions Unit which:

- (a) Is required to have a Permit to Operate (PTO) pursuant to the provisions of District Rules and Regulations
- (b) Is an Emissions Unit or process type which is listed in Appendix “E” of *Emission Inventory Criteria and Guidelines for the Air Toxics ‘Hot spots’ Program* as adopted by reference in 17 California Code of Regulations §93300.5 [<https://ww2.arb.ca.gov/sites/default/files/2022-10/Appendix%20E.pdf>]
- (c) Is subject to an Airborne Toxic Control Measure (ATCM)
- (d) Is subject to a New Source Performance Standard (NSPS) [See 42 U.S.C. §7411 & 40 CFR 60]
- (e) Is subject to a National Emission Standard for Hazardous Air Pollutant (NESHAP) Standard [See 42 U.S.C. §7412 & 40 CFR 61]
- (f) Is subject to a Maximum Achievable Control Technology (MACT) Standard [See 42 U.S.C. §7412 & 40 CFR 63]

## **V. PROCEDURE**

### **A. General Requirements**

The Comprehensive Emission Inventory (CEI) includes the release of all substances (criteria pollutants, their precursors, and state & federal toxic substances) emitted into the ambient air.

The emissions included in this inventory are typically from stationary emitting devices required to have District permits located at a regulated facility. Emitting devices that are exempt from permit may also be included in the inventory (included as fugitive emissions).

The CEIP and CEIR are to include all permitted sources (equipment) and permitted source fugitive emissions. Other fugitive emissions may be included. A facility that belongs to one of the twenty-seven (27) categories listed in 40 CFR 51.165(a)(1)(iv)(C) must include all fugitives associated with the facility. Note that air pollution control devices that are attached to another permitted source are not included as a separate reporting device (each is inherently included with the permitted device each serves).

**On-Site Mobile Sources:**

(1) Motor Vehicles: For facilities emitting more than 10 tons per year of any criteria pollutant, the facility operator shall include in the CEIP and CEIR the dust emissions produced from routine and predictable motor vehicle activity at the facility.

Tail pipe emissions and other emissions emanating directly from the motor vehicles are not included in the facility's CEIP/CEIR.

Section 415 of the Vehicle Code defines a "motor vehicle" as a vehicle which is self-propelled; "vehicle", in turn, is defined in Section 670 of the Vehicle Code as a device by which any person or property may be propelled, moved, or drawn upon a highway, excepting a device moved exclusively by human power or used exclusively upon stationary rails or tracks. Some examples of motor vehicles are automobiles, trucks, buses, road graders, earth movers, tractors, golf carts, motorcycles, self-propelled harvesters, forklifts, and sweepers.

(2) Other (Non-Motor Vehicle) Mobile Sources: For non-motor vehicle mobile sources (those not meeting the definition of motor vehicles) which operate within the facility, the following inventory information is required to be included in the facility's emission inventory plan and emission inventory report. For non-motor vehicle mobile sources which stay within the facility property, the facility operator shall include reporting of all emissions from such non-motor vehicle mobile sources. In addition, the district may require the facility operator to report activity data regarding the usage of non-motor vehicle mobile sources that are periodically located within the facility property. Examples of Non-Motor Vehicles include locomotives, airplanes, refrigeration units, auxiliary generators, welding machines, ships, and cranes.

**PERP/Contracted Portable Equipment Emissions Subject to Reporting:**

Emissions from equipment solely registered in the State Portable Equipment Registration Program (PERP) are not currently reported to the District; however, PERP equipment that has a concurrent District Permit at a facility must be included in the inventory.

Third-party owned, portable, pieces of equipment, such as a batch plant, or generator that is operated at another permitted facility in which the portable piece of equipment belongs to the same industrial grouping, either by virtue of falling under the same two-digit Standard Industrial Classification (SIC) code, or by being part of a common industrial process, manufacturing process, or connected process involving a common raw material must report the emissions of the portable piece of equipment in the inventory of the facility(ies) for which it operated during the subsequent emission year.

Existing sources, that emit a total of ten (10) tons per year or more of any criteria pollutant or their precursors, are required to prepare and submit a CEIP and CEIR, or an Update Survey, annually for criteria pollutant emissions, and every three (3) years for toxic substances.

Existing sources that emit a total of less than ten (10) tons per year of any criteria pollutant or their precursors are required to prepare and submit a CEIP and CEIR every three (3) years. Please refer to the Submission Cycles section to view the applicable submission year cycle.

## B. Criteria Pollutants

Criteria pollutants are those that are regulated by air quality standards that were set using health-based criteria. The following table includes criteria pollutants and their associated pollutant codes, and indication as to if they need be included in the CEIP and CEIR. Criteria pollutant emissions should be reported in tons per year, except lead and ammonia where emissions should be reported in pounds per year. Emissions of ammonia (NH<sub>3</sub>) and lead (Pb) with 42604 and 12128 pollutant codes should be reported in tons per year as criteria pollutants. Emissions of ammonia (NH<sub>3</sub>) and lead (Pb) with 7664417 and 7439921 pollutant codes should be reported in pounds per year as toxic pollutants.

Table 1- Criteria Pollutants

Pollutant Code	Pollutant Name	Abbreviated Name	Report to District
42101	Carbon Monoxide	CO	Yes
42603	Oxides of Nitrogen	NO <sub>x</sub>	Yes
42401	Oxides of Sulfur	SO <sub>x</sub>	Yes
11101	*Particulate Matter	PM	Yes
85101	*Particulate Matter 10 Microns or Less	PM <sub>10</sub>	Yes
88101	*Particulate Matter 2.5 Microns or Less	PM <sub>2.5</sub>	Yes
16113	*Reactive Organic Gases	ROG	Yes
43101	*Total Organic Gases	TOG	Yes
43104	*Volatile Organic Compounds	VOC	Yes
42604 & 7664417	Ammonia	NH <sub>3</sub>	Yes
12128 & 7439921	Lead	Pb	Yes
NA	GHG	CO <sub>2</sub>	No
NA	Other PSD Pollutants		No

**\*Important Note:** Please report either all three forms of PM (PM, PM<sub>10</sub>, and PM<sub>2.5</sub>) or one of the three. The same applies to the organic gases, please report either all three forms of organic gases (TOG, ROG and VOC) or one of the three. **DO NOT** report two out of three forms for PM and organic gases.

## C. Toxic Pollutants

Toxic air contaminants are those pollutants that are known to, or suspected to, cause cancer or other adverse health conditions even at extremely low levels, and some may accumulate in the body from repeated or chronic exposure. The toxic pollutants/substances which are to be included in the CEIP and CEIR are listed in the following referenced documents. Emissions of toxic substances must be reported in pounds per year:



- (a) Appendix A, *Emission Inventory Criteria and Guidelines for the Air Toxics ‘Hot Spots’ Program* (CARB); consisting of;
1. Appendix A-I Substances for which emissions must be quantified  
<https://ww2.arb.ca.gov/sites/default/files/2022-10/A-I.pdf>
  2. Appendix A-II Substances for which production, use or otherwise present must be reported  
<https://ww2.arb.ca.gov/sites/default/files/2022-10/A-II.pdf>
  3. Appendix A-III Substances for which emissions must be quantified if manufactured by the facility  
<https://ww2.arb.ca.gov/sites/default/files/2022-10/A-III.pdf>
- (b) 42 U.S.C. §7412(b) “List of Pollutants (Federal Clean Air Act §112(b) “List of Pollutants”).

Copies of these lists are available at the CARB link below, and/or USEPA websites (See “References”) or upon request from the District:

- <https://ww2.arb.ca.gov/our-work/programs/ab-2588-air-toxics-hot-spots/hot-spots-inventory-guidelines>

**Important Note:** Please report ammonia (NH<sub>3</sub>) and lead (Pb) emissions using both criteria and toxic pollutant codes. The toxic pollutant codes for ammonia (NH<sub>3</sub>) and lead (Pb) emissions are 7664417 and 7439921, respectively. Note that the applicable degree of accuracy for these pollutants, as described by CARB in the EICG guidelines, is 200 pounds per year ammonia and 0.5 pounds per year lead; meaning that when a facility emits pollutant at or over these thresholds the facility must report these emissions.

Please note that once the toxic emissions are quantified and approved, the District is required to prioritize and categorize the risk associated with the emission source(s) (the facility) to determine if a health risk assessment is warranted, known as Emission Unit Prioritization Scoring. Prioritization scores are calculated for carcinogenic effects, non-carcinogenic acute effects, and non-carcinogenic chronic effects. Prioritization scores are calculated utilizing the most recently approved CAPCOA Facility Prioritization Guidelines; the most recently approved OEHHA Unit Risk Factor for cancer potency factors; and the most recently approved OEHHA Reference Exposure Levels for non-cancer acute factors, and non-cancer chronic factors.

The District’s Emission Unit Prioritization Scoring procedure for risk assessment takes into consideration potency, toxicity, quantity of emissions and proximity of the facility to potential receptors. This procedure categorizes the facility’s risk as a high, intermediate or low priority. Facilities categorized as “high” are subject to health risk assessment (HRA) requirements. Facilities categorized as “intermediate” may be subject to HRA requirements. Facilities categorized as “low” are not subject to HRA requirements. The District may adjust the prioritization scores using additional factors such as release parameters, receptor type, meteorological conditions, etc. to obtain an accurate assessment of the facility.

Facilities required to submit a HRA must adhere to the CARB/CAPCOA's Risk Management Guidance for Stationary Sources of Air Toxics and the updated health risk assessment methodology defined by OEHHA in 2015. These documents can be found at the following links:

- CARB/CAPCOA's: Risk Management Guidance for Stationary Sources of Air Toxics: <https://www.arb.ca.gov/toxics/rma/rmgssat.pdf>
- OEHHA's Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments: <https://oehha.ca.gov/air/crnrr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0>

## **D. Introduction to CEIP and CEIR**

A facility that has previously submitted a CEIP need not resubmit a CEIP unless the facility has introduced any new potential emission source(s) (either permitted or non-permitted) for which the District has not evaluated potential emissions or risk; or, a new offsite receptor has encroached upon the facility within 500 meters. In addition, to streamline the CEIP/CEIR process, facilities previously receiving approval of their CEIP/CEIR, should follow the guidance described under the section "Application CEIP/CEIR Submissions".

## **E. Preparing the Comprehensive Emission Inventory Plan (CEIP)**

The CEIP is a plan on how the CEIR will be prepared. The CEIP must be on District forms ('CER', 'SIC', 'LOC', 'DFD', and 'EQM') or forms approved by the District. Preparation of the CEIP shall be performed pursuant to the procedure found in the most recent *Emission Inventory Criteria and Guidelines for the Air Toxics 'Hot Spots' Program* as adopted by CARB. All forms, worksheets, and lists are available electronically, in Excel format, from the District, upon request, or on the District website at <http://www.mdaqmd.ca.gov/permitting/emissions-inventory-program>. Copies of the CARB documents are available at the CARB website (See "References") or from the District upon request. For assistance in acquiring District forms, please contact the assigned engineer to your facility, or request to speak to the permitting department at 760-245-1661, or via email at [engineering@mdaqmd.ca.gov](mailto:engineering@mdaqmd.ca.gov).

## **F. Preparing the Comprehensive Emission Inventory Report (CEIR)**

The CEIR shall be prepared in accordance with the procedures found in the following:

- (a) *Emission Inventory Procedural Manual Volume I – Inventory Development Process*; and,
- (b) *Emission Inventory Criteria and Guidelines for the Air Toxics 'Hot Spots' Program*.

District forms “Certification - CER”, “Location of Emission Sources - LOC-ES”, and “Release Data – REL” must be included with each CEIR submittal. For facilities with more than five permitted units, the CEIR submission must be submitted to the District in either HARP2 transaction file format or HARP2 compatible access database. Copies of the above referenced documents and the HARP2 program may be obtained at the CARB website (See “References”) or from the District upon request. All supporting digital workbooks (i.e. spreadsheets) must accompany each submittal, and all materials for which emission rates are based must be available and presented to District upon request.

## ***Important HARP2 requirements...***

### ***Facility Data***

- Beginning in emission year 2017, Please use the required new facility naming convention, i.e. the facility number only.
  - Example: Below is a picture of a District Permit and the statements below demonstrate the proper naming conventions.



#### **MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT**

14306 Park Avenue, Victorville, CA 92392-2310  
760.245.1661 -- 800.635.4617 -- FAX 760.245.2022

#### **PERMIT TO OPERATE**

B011715

Operation under this permit must be conducted in compliance with all information included with the initial application, initial permit condition, and conditions contained herein. The equipment must be maintained and kept in good operating condition at all times. This Permit to Operate or copy must be posted on or within 8 meters of equipment. If a copy is posted, the original must be maintained on site, available for inspection at all times.

**EXPIRES LAST DAY OF: DECEMBER 2018**

#### **OWNER OR OPERATOR (Co. #3)**

Daily Transit Mix, LLC  
17671 Bear Valley Rd  
Hesperia, CA 92345

#### **EQUIPMENT LOCATION (Fac. #1294)**

Daily Transit Mix, LLC  
Paradise Road/Fort Irwin Road  
Fort Irwin, CA 92310

#### **Description:**

CONCRETE BATCH PLANT (ROSS PLANT) consisting of:

Fee Schedule: 1 (b)

Rating: 63 bhp

NAICS: 327320

SCC: 30501101

Location/Coordinates:  
+35.13982, -116.76675

This permit does not authorize the emission of air contaminants in excess of those allowed by law, including Division 26 of the Health and Safety Code of the State of California and the Rules and Regulations of the District. This permit cannot be construed as permission to violate existing laws, ordinances, statutes or regulations of this or other governmental agencies. This permit must be renewed by the expiration date above. If billing for renewal fee required by Rule 301(c) is not received by expiration date above, please contact the District.

Daily Transit Mix, LLC  
17671 Bear Valley Rd  
Hesperia, CA 92345

By: **COPY**

**Brad Poiriez**

Air Pollution Control Officer

- Facility Name (FNAME) = Equipment Location
- Equipment Location = Daily Transit Mix, LLC
- Facility ID (FACID) = Facility (Fac.) #
- Facility (Fac.) # = Equipment Location = 1294
- Facility ID (FACID) = 1294
- Coordinate System Type = “Lat and Long (decimal degrees)”
- Datum = “WGS84 – World Geodetic System 1984”
- Zone = “11”
- NAICS, SCC, Longitude and Latitude data can be found at the bottom of the District Permit.

### *Release Data*

- Provide conventional name(s) for release(s), i.e.
  - Release ID (STK) = Last 5 digits of Permit # = 11715
  - Release Name = a name that matches the district permit, or one that is obvious to District staff.
  - Pick “Release Type”:
    - Point (Stack)
    - Volume
    - Area
    - Open Pit
  - Enter all known or obtainable data. At a minimum enter Release Location (Geographical Location, i.e. Latitude and Longitude. This is needed for risk assessment purposes. It is recommended that you use the exact location of the release point, but the Release Location can be set to the facility coordinates (origin) where the release point location is representative of the facility origin.

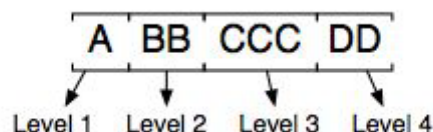
### *Device Data*

- Device ID (DEV) – Last 5 digits of District Permit # = 11715
  - For fugitive sources use 90000 for the Device ID (DEV), with multiple fugitive sources following as 90001, 90002, etc.
- For the Device Name (DEVNM) use the name of the facility’s choice or enter Permit Description, i.e. DEVNM = Concrete Batch Plant
  - For fugitive sources enter “FUGITIVE” as the Device Name (DEVNM).
- Include Local Permit ID (PERID), i.e. PERID = B011715
  - If multiple Permit IDs are inventoried under one local Permit, add note in the comment field as to which other Permit IDs are included.
- Enter number of Devices (NUMDEV)
- **Important note:** Please ensure there are no devices without any process associated with them (referred to as widow devices). All widow devices will be deleted.

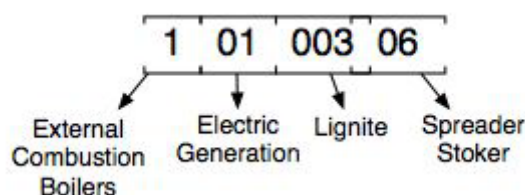
### *Process Data*

- Process ID (PROID) – Enter up to a 2-digit number, starting a 1 and up to 99.
- Process Description (PRDESC) – Should be a conventional name for that process that delineates it from the other uses of that equipment, i.e. gelcoat line, natural gas, batch plant, etc.
- Enter “SIC”
- Enter “SCC”

- Update Source Classification Code (SCC) if it is not listed, or filled in with all “9”s.
  - District, State, and Federal emission inventory programs use SCCs to classify different types of anthropogenic emission activities. SCCs have 8 digits for point sources. Historically, the District allowed the use of an SCC with all 9’s, i.e. “99999999” to classify a process that did not specifically fit into Levels 1 through 4; however, this practice is no longer accepted as the Districts reporting program (HARP2/CEIDARS) will no longer accept the all “9”s as a valid SCC, so please update accordingly.
  - The code structure for the 8-digit point-source codes is:



- An example point-source activity and corresponding SCC is given below: “External Combustion Boilers; Electric Generation; Lignite; Spreader Stoker” is represented by 10100306. Below we have mapped the levels of this description with the levels of the SCC:



- Notate in HARP2 comment field when an invalid SCC is used.
- Enter Process Rate
  - If process rate units are not same as displayed, make note in the Process Information comments field.
- Enter all other known data to the greatest extent possible, i.e. the Operating Hours per Day, the Operating Hours per Week, the Operating Weeks per Year, and the Year of the Emission Estimate (YREST).
- Link any Release IDs to the Process Information page for any associated release points/stacks.

### *Emissions Information Data*

- Include emission factors (EMS Factor – EMFACT) for each pollutant.
- Include control efficiency
- Do not forget to recalculate your emissions when you update emission factors or throughputs.
- Indicate emission calculation method used by selecting the button named EMS Calc. Method (METH) highlighted red, below and choosing from the dropdown list:

Emission Information

Add Save Delete Previous Next Close

Last Updated (EMSUP\_D)  Device ID (DEV)  History

Pollutant ID (POL)  Process ID (PROID)  Last EMS Update (EMSUP)

Pollutant Name  Person Changing (EMSUPID)

Control Devices

Primary Control (CNTL1)


Secondary Control

Control Efficiency (Percent)

Forecasted

Emission Factors

Uncontrolled EMS Factor

EMS Factor (EMFACT)  

EMS Factor Last Update

Reason for Change

Person Changing (EMFACUPID)


EMS Fact Origin (EMORIG)


EMS Factor Reliability (EMREL)

Emissions

Maintained by

UnRec. EMS (UNREMS) (area tpy)

Annual EMS (tons/yr)  

Hr Max EMS (lbs/hr)  

Excess EMS (EXEMS)

Potential

EMS Calc. Method (METH)

Excess Information

Create CT Record for POL

Fraction

Calc. Frac. ROG, PM10

Fraction ROG

Calc. Frac. VOC, PM 2.5

Fraction VOC

Dis. Frac. PM 1.0

Load User-Defined Fractions

Compute emissions

Calculate EMS from ROG

Calculate EMS from TOG

Estimation status (CR\_FLAG)

Memo

[See CEIDARS Data Field Descriptions](#)

Record 1 of 1

## **VI. SCHEDULE**

### **A. General**

All existing stationary sources of air pollutants are required to submit CEIP and CEIR upon a schedule established by the District. This schedule is determined by the facility type based on the applicable NAICS designation which is set forth in the Submission Cycles section below. Please note that a new or updated CEIP and CEIR will be required for new or modified facilities or emission units in conjunction with the application for construction or modification (See the requirements of District Rule 1302). Such new or updated CEIP/CEIR will not exempt a facility from submitting its next regularly scheduled submission under the Three-Year Cycle as indicated by Table 3 and 4.

### **B. Application CEIP/CEIR Submissions**

New or modified Facilities or Emissions Unit(s) are required to submit a CEIP and CEIR with the application for construction or modification. For existing Facilities with a current CEIP and CEIR, which has been approved by, and is on file with, the District, the application CEIP and CEIR submission may be in the form of a revision. A revised CEIP and CEIR shall be prepared in the same manner, using the current CEIP and CEIR, and including the location and emissions (or proposed emissions) from any new or modified emission unit(s). The CEIP and CEIR will also need to indicate which, if any, existing Emissions Unit(s) have or will be removed from service or which have modified emissions. The District reserves the right, upon written notice to the applicant, to require a complete CEIP and CEIR submission with any application.

Please note, new or modified Facilities or Emissions Unit(s) may be required to submit an additional CEIP and CEIR in a time period of less than three (3) years from the date of their application if they belong to a source category which is required to submit a CEIP and CEIR in a particular year. For example: a wood coater submits an application for a modification that includes a CEIP and CEIR in 2018. Consequently, such a wood coater would be required to submit a revised CEIP for emission year 2018 by January 31, 2019 and a CEIR by February 28, 2019. When updating the CEIP and CEIR for emission year 2019, the CEIP would be due by January 31, 2020 and an updated CEIR by February 28, 2020 and every three years thereafter.

## C. Submission Cycles

The District will send a request letter to the facility when a CEIP and CEIR are due; however, the general guidance for submission is summarized below. The District does its very best to inventory every facility in the District at least once every three years.

The following facilities are required prepare and submit a CEIP and CEIR on an annual basis unless otherwise exempted by the District:

- 1) Any federally major facility, i.e. facilities that have a Title V Permit/Federal Operating Permit.
- 2) Any facility that has a potential to emit a criteria or toxic pollutant at 80 percent of the Title V applicability threshold or greater, i.e. a “synthetic minor” facility. The potential to emit thresholds for “synthetic minor” facilities are indicated in Table 2, below. If a facility has a potential to emit at these thresholds or greater they must report annually.
- 3) Any facility for which during an application and evaluation process an annual requirement was deemed necessary to comply with the New Source Review and/or Toxic New Source Review programs, enforceable through a permit condition. The most common example is an annual inventory requirement to verify compliance with a facility emissions limit or limits (facility cap).
- 4) Any Dry Cleaning facility that uses perchloroethylene solvent.
- 5) Any Retail Gasoline Dispensing facility.
- 6) Any facility that is subject to the annual emissions reporting requirements of AB 617 and/or the Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants” (or CTR).

Table 2 – Synthetic Minor Sources: Potential to Emit

<b>Pollutant</b>	<b>Facilities located in the FONA* Potential to Emit (tons per year)</b>	<b>Facilities located outside the FONA* Potential to Emit (tons per year)</b>
NO <sub>x</sub>	20	80
VOC	20	80
CO	80	80
PM <sub>10</sub>	80	80
SO <sub>x</sub>	80	80
Any single toxic pollutant	8	8
Any combination of toxic pollutants	20	20

\*FONA means the Federal Ozone Non-Attainment Area as specified in District Rule 102.

Any facility that is not subject to the annual reporting requirements specified above is required to prepare and submit a CEIP and CEIR every three (3) years. Please refer to Table 4 - Third Year Cycles for applicable submission year cycle.



Table 4 - Third Year Cycle for CEIP &amp; CEIR Submissions

Group	Facility Type	NAICS	Emission Year	CEIP/CEIR Due
A	Mining	212xxx	2024, 2027, etc.	2025, 2028, etc.
	Cement Manufacturing	327310		
	Transportation Equipment Manufacturing	336xxx		
	Air Transportation	48xxxx		
	Other Transportation	49xxxx		
	Dry Cleaning	812320		
	Space Research and Technology	927110		
B	Food Manufacturing	31xxxx	2025, 2028, etc.	2026, 2029, etc.
	Wood Product Manufacturing	321xxx		
	Printing	323xxx		
	Petroleum and Coal	324xxx		
	Chemical Manufacturing	325xxx		
	Plastics and Rubber	326xxx		
	Glass Manufacturing	3272xx		
	Ready-Mix Concrete	32732x		
	Concrete Pipe, Brick and Block	32733x		
	Lime and Gypsum	3274xx		
	Nonmetallic Mineral	3279xx		
	Machinery Manufacturing	333xxx		
	Furniture Manufacturing	337xxx		
	Automobile Dealer	4411xx		
	Information	51xxxx		
	Real Estate	53xxxx		
	Waste Management	56xxxx		
	Repair and Maintenance	811xxx		
	Public Administration	921xxx		
		922xxx		
		924xxx		
		928xxx		

*Please note this table is continued on the next page.*

Group	Facility Type	NAICS	Emission Year	CEIP/CEIR Due
C*	Agriculture	1xxxxx	2023, 2026, etc.	2024, 2027, etc.
	Mining Support	213xxx		
	Utilities	22xxxx		
	Construction	23xxxx		
	Metal Manufacturing	331xxx		
	Fabricated Metal Product	332xxx		
	Computer and Electronics	334xxx		
	Electrical Equipment	335xxx		
	Miscellaneous Manufacturing	339xxx		
	Wholesale Trade	42xxxx		
	Building Material Dealer	444xxx		
	Food and Beverage Stores	445xxx		
	Gasoline Station	447xxx		
	Sporting Goods Retail	45xxxx		
	Finance and Insurance	52xxxx		
	Services	54xxxx		
	Education	6xxxxx		
	Other Services	7xxxxx		
	Death Care Services	8122xx		
	Other Personal Services	8129xx		
	Civic Organizations	813xxx		

*\*Or all non-A and non-B Groups*

## D. Annual Time Table for Submissions

The following is the standard schedule for submission of CEIP and CEIR documents to the District. The District reserves the right to require submission of CEIP and CEIR documents on a different time schedule to meet the needs of the District or State. Facilities will be notified in writing if an alternative time schedule for submissions will be used.

Table 5 - CEIP & CEIR Submission Deadlines

Document Type	Deadline/Due Date
Update Survey – UDS	January 15 <sup>th</sup>
Inventory Plan – CEIP	January 31 <sup>st</sup>
Inventory Report – CEIR	February 28 <sup>th</sup>
District Inventory to CARB	June 1 <sup>st</sup>

## E. Previous Inventory Data

The District has copies of the previously submitted emissions inventory data for many facilities in HARP2 format. Such data is available in electronic format for ‘Importing’ into HARP2 or printout (hardcopy) format from the District upon request. The District strongly suggests that a facility use the HARP2 transaction file previously approved by the District as a starting point for updating subsequent inventories.

A facility can review their previous inventory data in CARB’s District Resources for Emission Inventory Database also known as California’s Emission Inventory Development and Reporting System (CEIDARS):

- <https://www.arb.ca.gov/ei/drei/maintain/database.htm>

## VII. REFERENCES AND HELPFUL LINKS

Many of the documents referenced in these Guidelines may be found on the Internet. The following listed documents may be downloaded or read at the following locations:

- Proposed Consolidated Emissions Reporting Rule (65 FR 33268, 5/23/200):
  - <https://www3.epa.gov/ttn/atwfiles/cerr/cerrpg.html>
- MDAQMD Rule & Regulations:
  - <http://www.mdaqmd.ca.gov/rules/rule-book>
- California Air Toxics Program
  - <http://www.arb.ca.gov/toxics/toxics.htm>
  - <http://www.arb.ca.gov/ab2588/ab2588.htm>
- Emission Inventory Criteria and Guidelines for the Air Toxics “Hot Spots” Program
  - <https://ww2.arb.ca.gov/our-work/programs/criteria-and-toxics-reporting>
  - [www.arb.ca.gov/ab2588/2588guid.htm](http://www.arb.ca.gov/ab2588/2588guid.htm)
- ATCM Standards
  - <https://ww2.arb.ca.gov/resources/documents/airborne-toxic-control-measures>
- New Source Performance Standards
  - <https://www.epa.gov/stationary-sources-air-pollution/national-emission-standards-hazardous-air-pollutants-neshap-8>
- NESHAPS/MACT Standards
  - <https://www.epa.gov/stationary-sources-air-pollution/national-emission-standards-hazardous-air-pollutants-neshap-9>
- List of Hazardous Air Pollutants under 42 U.S.C. §7412
  - <https://www.epa.gov/haps/initial-list-hazardous-air-pollutants-modifications#mods>

- HARP  
<http://www.arb.ca.gov/toxics/harp/harp.htm>
- Health Risk Assessment Guidance
  - CARB/CAPCOA's: Risk Management Guidance for Stationary Sources of Air Toxics:  
<https://www.arb.ca.gov/toxics/rma/rmgssat.pdf>
  - OEHHA's Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments:  
<https://oehha.ca.gov/air/cnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0>
- Emission Inventory Methods  
<http://www.arb.ca.gov/ei/ei.htm>  
<https://www.epa.gov/air-emissions-inventories>
- Emission Factors
  - Clearing House for Inventories and Emission Factors (CHIEF):  
<https://www.epa.gov/chief>
  - USEPA's AP-42:  
<https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emission-factors>
  - California Air Toxic Emission Factors (CATEF):  
<http://www.arb.ca.gov/ei/catef/catef.htm>
  - San Diego APCD:  
[http://www.sdapcd.org/content/sdc/apcd/en/engineering/Permits/Engineering\\_Emissions\\_Inventory/Engineering\\_Phase\\_3\\_Toxics\\_Procedures.html](http://www.sdapcd.org/content/sdc/apcd/en/engineering/Permits/Engineering_Emissions_Inventory/Engineering_Phase_3_Toxics_Procedures.html)
  - Ventura Co. APCD:  
<http://www.vcapcd.org/pubs/Engineering/AirToxics/combem.pdf>
  - South Coast AQMD:  
<http://www.aqmd.gov/aer/aer.html>
  - Mojave Desert AQMD:  
<http://www.mdaqmd.ca.gov/permitting/emissions-inventory-program>
- Standard Industrial Classification (SIC):  
<https://www.osha.gov/data/sic-search>
- North American Industry Classification System (NAICS):  
<https://www.census.gov/naics/>
- Source Classification Code (SCC):  
<https://sor-scc-api.epa.gov/sccwebservices/sccsearch/>
- Maps/Photos
  - Google Earth: <http://earth.google.com/> (Free Version)