



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

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## A G E N D A

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### MEETING, SEPTEMBER 4, 2015

A meeting of the South Coast Air Quality Management District Board will be held at 9:00 a.m., in the Auditorium at SCAQMD Headquarters, 21865 Copley Drive, Diamond Bar, California.

#### Questions About an Agenda Item

- The name and telephone number of the appropriate staff person to call for additional information or to resolve concerns is listed for each agenda item.
- In preparation for the meeting, you are encouraged to obtain whatever clarifying information may be needed to allow the Board to move expeditiously in its deliberations.

#### Meeting Procedures

- The public meeting of the SCAQMD Governing Board begins at 9:00 a.m. The Governing Board generally will consider items in the order listed on the agenda. However, any item may be considered in any order.
- After taking action on any agenda item not requiring a public hearing, the Board may reconsider or amend the item at any time during the meeting.

#### Questions About Progress of the Meeting

- During the meeting, the public may call the Clerk of the Board's Office at (909) 396-2500 for the number of the agenda item the Board is currently discussing.

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The agenda and documents in the agenda packet will be made available upon request in appropriate alternative formats to assist persons with a disability. Disability-related accommodations will also be made available to allow participation in the Board meeting. Any accommodations must be requested as soon as practicable. Requests will be accommodated to the extent feasible. Please telephone the Clerk of the Boards Office at (909) 396-2500 from 7:00 a.m. to 5:30 p.m. Tuesday through Friday.

All documents (i) constituting non-exempt public records, (ii) relating to an item on the agenda, and (iii) having been distributed to at least a majority of the Governing Board after the agenda is posted, are available prior to the meeting for public review at the South Coast Air Quality Management District Clerk of the Board's Office, 21865 Copley Drive, Diamond Bar, CA 91765.

The Agenda is subject to revisions. For the latest version of agenda items herein or missing agenda items, check the District's web page ([www.aqmd.gov](http://www.aqmd.gov)) or contact the Clerk of the Board, (909) 396-2500. Copies of revised agendas will also be available at the Board meeting.

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**CALL TO ORDER**

- Pledge of Allegiance
- Opening Comments: William A. Burke, Ed.D., Chair  
Other Board Members  
Barry R. Wallerstein, D. Env., Executive Officer

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Staff/Phone (909) 396-

**CONSENT CALENDAR (Items 1 through 25)**

Note: Consent Calendar items held for discussion will be moved to Item No. 26

1. Approve Minutes of July 10, 2015 Board Meeting **McDaniel/2500**
  
2. Set Public Hearings October 2, 2015 to Consider Amendments and/or Adoption to SCAQMD Rules and Regulations **Wallerstein/3131**
  - A. Amend Rule 1106 – Marine and Pleasure Craft Coating Operations and Rescind Rule 1106.1 – Pleasure Craft Coating Operations **Fine/2239**

The proposed amendment to Rule 1106 subsumes the requirements of Rule 1106.1, and revises VOC content limits for pretreatment wash primers, antenna repair and maintenance thermoplastic, inorganic zinc, and specialty marking coatings in order to align limits with U.S. EPA Control Techniques Guidelines and other California air districts, and adds new categories for marine aluminum antifoulant, mist, nonskid and organic zinc coatings and marine deck primer sealant. The proposed amendment also adds provisions for pollution prevention measures, enhanced enforceability, and to promote clarity and consistency. (Reviewed: Stationary Source Committee, July 24, 2015)

**Budget/Fiscal Impact**

3. Recognize and Appropriate Funds and Execute Contract for EV Charging Stations and Service at SCAQMD Headquarters and Release RFP for Installation **E** **Miyasato/3249**

The Board previously approved the release of an RFP to upgrade and expand EV charging infrastructure at SCAQMD headquarters. Subsequently, an RFP was released for engineering design services to prepare construction drawings for installation of electrical infrastructure. A contractor was selected and the drawings will serve as a blueprint for installation. These actions are to: 1) recognize and appropriate \$322,425 from the Clean Fuels Fund (31) into Science & Technology Advancement's FY 2015-16 Budget; 2) execute a contract with Broadband TelCom Power, Inc. for EV hardware and control system at SCAQMD headquarters for up to \$322,425 from Science & Technology Advancement's FY 2015-16 Budget; and 3) release an RFP for contractor services to install the new EV charging stations and the required electrical infrastructure at SCAQMD headquarters. (Reviewed: Technology Committee, July 24, 2015; Recommended for Approval)

4. Execute Contracts for FY 2013-14 "Year 16" Carl Moyer Multidistrict Program and Transfer Funds for Multidistrict Truck Projects under Voucher Incentive Program **Minassian/2641**

On May 6, 2015, proposals were received in response to the Program Announcement issued for the "Year 16" Carl Moyer Multidistrict Program. These actions are to: 1) execute contracts in an amount not to exceed \$1,380,560 from the Carl Moyer Program SB 1107 Multidistrict Fund (32); and 2) transfer \$1,469,440 from the Carl Moyer Program SB 1107 Multidistrict Fund (32) to the Voucher Incentive Program Fund (59) to fund multidistrict truck replacement projects on a first come, first served basis. (Reviewed: Technology Committee, July 24, 2015; Recommended for Approval)

5. Execute Contracts to Cosponsor Sustainable Transportation Energy Pathways 2015-2018 Program **E** **Miyasato/3249**

The Sustainable Transportation Energy Pathways (STEPS) Program at the U. C. Davis Institute of Transportation Studies is continuing their multidisciplinary research consortium that brings together the world's leading automotive manufacturers, energy companies and government agencies to understand sustainable vehicle and energy solutions and requests continued funding for 2015 through 2018. This action is to execute a contract with U.C. Davis to cosponsor the STEPS 2015-2018 Program in an amount not to exceed \$240,000 from the Clean Fuels Fund (31). (Reviewed: Technology Committee, July 24, 2015; Recommended for Approval)

6. **Establish Residential EV Charging Incentive Pilot Program**  **Miyasato/3249**

An incentive program for residential EV charging will assist in accelerating deployment of PEVs. This action is to establish a residential EV charging incentive pilot program and authorize the Executive Officer to issue rebates to program participants in an amount not to exceed \$500,000 from the Clean Fuels Fund (31). (Reviewed: Technology Committee, July 24, 2015; Recommended for Approval)

7. **Recognize Revenue and Appropriate Funds for AB 1318 Weatherization Projects** **Minassian/2641**

To enhance the SCAQMD's AB 1318 Weatherization Program and reach more homes, SCAQMD has applied for residential rebates from the Southern California Gas Company (SoCalGas) and the Energy Upgrade California (EUC) initiative for additional installation of attic insulation in eligible homes. Staff anticipates receiving up to \$50,000 each from SoCalGas and EUC. This action is to recognize up to \$100,000 in the AB 1318 Mitigation Fees Fund (58). (Reviewed: Administrative Committee, July 17, 2015. Less than a quorum was present; the Committee Members concurred that this item be approved by the Board.)

8. **Execute Contract for Tier 4 Passenger Locomotives** **Minassian/2641**

At its February 1, 2013, and February 7, 2014 meetings, the Board approved awards to the Southern California Regional Rail Authority (SCRRA) in the amount of \$52 million for the replacement of 20 passenger locomotives with new Tier 4 locomotives over a four-year period. Under the "Year 16" Carl Moyer Program Announcement, SCRRA submitted a new proposal requesting \$58.85 million for the replacement of an additional 17 and the purchase of 3 new Tier 4 passenger locomotives. Staff has completed the evaluation of the project and confirmed its eligibility with CARB staff. This action is to execute a contract with SCRRA in an amount not to exceed \$22.85 million from the Carl Moyer Program AB 923 Fund (80). The remaining \$36 million requested by SCRRA will be considered over four phases in future Board requests. (Reviewed: Special Technology Committee, August 14, 2015; Recommended for Approval)

9. **Execute Contract for CEQA Consultant Assistance** **Whynot/3104**

At its May 1, 2015 meeting, the Board approved the release of an RFP to secure assistance with preparing the Program Environmental Impact Report for the 2016 Air Quality Management Plan and other tasks necessary for complying with the California Environmental Quality Act. Four proposals were received and reviewed by a qualified panel. Two proposals scored above the minimum number of points required for technical merit and were further evaluated and scored according to costs necessary to prepare the Program Environmental Impact Report. This action is to award a time and materials contract to Environmental Audit Inc. for an amount not to exceed \$125,000. Funds for this contract are included in the FY 2015-16 Budget. (Reviewed: Administrative Committee, July 17, 2015. Less than a quorum was present; the Committee Members concurred that this item be approved by the Board.)

10. **Replace Cleveland Range Food Steamer in Cafeteria** **Johnson/3018**

The current cafeteria Cleveland Range pressureless convection steamer used for food preparation is over 23 years old. This equipment is at the end of its life cycle and beyond repair. This action is to approve the purchase of a new Cleveland Range pressureless convection steamer in an amount not to exceed \$18,903. Funding for this purchase is available in the Infrastructure Improvement Fund (02). (Reviewed: Special Administrative Committee, August 14, 2015; Recommended for Approval)

11. **Authorize Purchase of Audio-Visual System Upgrades in Hearing Board and GB Rooms** **Marlia/3148**

On April 3, 2015, the Board approved release of an RFP to select a vendor capable of upgrading SCAQMD's audio-visual systems in the Hearing Board and GB rooms at the Diamond Bar headquarters. Due to the audio-visual limitations in both rooms, SCAQMD is seeking a contractor capable of implementing the SCAQMD's engineering design, providing the required audio-visual functionality in both rooms. As a result of successful responses to this RFP, Digital Networks Group, Inc. was identified as the most capable and qualified vendor to provide the audio-visual system upgrades in the Hearing Board and GB rooms. This action is to approve the purchase of these services from Digital Networks Group, Inc. Funds (\$339,676) are available in the FY 2015-16 Budget. (Reviewed: Administrative Committee, July 17, 2015. Less than a quorum was present; the Committee Members concurred that this item be approved by the Board.)

12. **Approve Contribution for Endowment to University of California Riverside to Support County of Riverside, University of California Riverside, University of California Riverside CE-CERT, City of Riverside, and Riverside Public Utilities Proposal for CARB's Southern California Consolidation Project** **O'Kelly/2828**

CARB is seeking a new and expanded facility in Southern California for vehicle emissions testing and office space for its Mobile Source related staff that are currently located in El Monte, California. The new facility is greatly expanded compared to the existing facility and will need to house a greater number of staff. An opportunity has arisen to support the overall Riverside proposal in a manner that could result in significant dividends for SCAQMD. Specifically, there is an opportunity to enhance the SCAQMD's long-standing relationship with University of California Riverside through an Endowment that could provide additional training of SCAQMD staff, opportunities for enhanced candidate pools for mobile source related positions at SCAQMD, and additional opportunities for SCAQMD to partner on mobile source issues related to emissions characterization and control and strategy implementation. Staff recommends a \$1 million Endowment from interest accrued in the BP Arco Settlement Projects Fund (46) toward the proposal being put forth by the Riverside Team for specific purposes. (Reviewed: Special Administrative Committee, August 14, 2015; Recommended for Approval)

13. **Revise Procurement Policy and Procedure**

**O'Kelly/2828**

This action is to revise SCAQMD's Procurement Policy and Procedure to incorporate "most favored customer" preference into the procurement process. (Reviewed: Administrative Committee, July 17, 2015. Less than a quorum was present; the Committee Members concurred that this item be approved by the Board.)

14. **Authorize Executive Officer to Execute Agreement to Transfer Oversight of BP/SCAQMD Public Benefits Program to Board, Approve Administrative Changes to Existing Program Contracts, and Execute Contract for Air Pollution Health Effects Study**

**Wallerstein/3131**

This action is to approve an agreement with BP to transfer oversight of the BP/SCAQMD Public Benefits Program to the Board, approve administrative changes for several current projects funded by the program, and to fund a health study related to the ability of ambient pollutants to exacerbate the development of an allergic response in an animal model. The study is by the University of California, Los Angeles and Michigan State University for an amount not to exceed \$172,000. The proposed study will be funded from the BP/SCAQMD Public Benefits Oversight Special Revenue Fund (Fund 65). (Reviewed: Administrative Committee, July 17, 2015. Less than a quorum was present; the Committee Members concurred that this item be approved by the Board.)

15. **Appropriate Funds from Designation for Litigation and Enforcement and Authorize Amending/Initiating Contracts with Outside Counsel and Specialized Legal Counsel and Services**

**Wiese/3460**

Legal is currently being assisted in environmental lawsuits by outside law firms and in other matters requiring specialized legal counsel and services, principally on-going litigation with Exide Technologies, Inc. This action is to appropriate \$750,000 from the Designation for Litigation and Enforcement, to FY 2015-16 Legal Budget and amend or initiate contracts to expend these funds with prequalified counsel approved by the Board as well as specialized legal counsel and services. (Reviewed: Administrative Committee, July 17, 2015. Less than a quorum was present; the Committee Members concurred that this item be approved by the Board.)

16. Approve Contract Awards and Allocation Approved by MSRC **Pettis**

As part of their FYs 2014-16 AB 2766 Discretionary Fund Work Program, the MSRC approved 25 new contracts under the Local Government Program, a contract for programmatic outreach services for the MSRC, a sole-source contract under the Transportation Control Measure Partnership Program. The MSRC also approved a funding allocation towards the Residential Electric Vehicle Charging Incentive Pilot Program. As part of their FY 2011-12 Work Program, the MSRC approved a replacement contract with the City of Palm Springs to complete work initiated under an earlier contract. At this time, the MSRC seeks Board approval of the contract awards and allocation. (Reviewed: Mobile Source Air Pollution Reduction Review Committee, August 20, 2015; Recommended for Approval)

**Items 17 through 25 - Information Only/Receive and File**

17. Legislative and Public Affairs Report **Smith/3242**

This report highlights the June and July 2015 outreach activities of Legislative and Public Affairs, which include: Environmental Justice Update, Community Events/Public Meetings, Business Assistance, and Outreach to Business and Federal, State, and Local Government. (No Committee Review)

18. Hearing Board Report **Camarena/2500**

This reports the actions taken by the Hearing Board during the period of June 1 through July 31, 2015. (No Committee Review)

19. Civil Filings and Civil Penalties Report **Wiese/3460**

This reports the monthly penalties from June 1 through June 30, 2015, and legal actions filed by the General Counsel's Office from June 1 through June 30, 2015. An Index of District Rules is attached with the penalty report. (Reviewed: Stationary Source Committee, July 24, 2015)

20. Report of RFPs Scheduled for Release in September **O'Kelly/2828**

This report summarizes the RFPs for budgeted services over \$75,000 scheduled to be released for advertisement for the month of September. (Reviewed: Administrative Committee, July 17, 2015. Less than a quorum was present; the Committee Members concurred that this item be approved by the Board.)

21. FY 2014-15 Contract Activity **O'Kelly/2828**

This report lists the number of contracts let during FY 2014-15, the respective dollar amounts, award type, and the authorized contract signatory for SCAQMD. This report includes the data provided in the March 2015 report covering contract activity for the first six months of FY 2014-15. (No Committee Review)

22. Summary of Changes to FY 2014-15 Approved Budget **O'Kelly/2828**

This is the annual report of budget changes for FY 2014-15. (No Committee Review)

23. Lead Agency Projects and Environmental Documents Received by SCAQMD **Fine/2239**

This report provides, for the Board's consideration, a listing of CEQA documents received by the SCAQMD between June 1, 2015 and July 31, 2015, and those projects for which the SCAQMD is acting as lead agency pursuant to CEQA. (No Committee Review)

24. Rule and Control Measure Forecast **Fine/2239**

This report highlights SCAQMD rulemaking activities and public workshops potentially scheduled for the year 2015 and portions of 2016. (No Committee Review)

25. Status Report on Major Projects for Information Management Scheduled to Start During First Six Months of FY 2015-16 **Marlia/3148**

Information Management is responsible for data systems management services in support of all SCAQMD operations. This action is to provide the monthly status report on major automation contracts and projects to be initiated by Information Management during the first six months of FY 2015-16. (No Committee Review)

26. Items Deferred from Consent Calendar

**BOARD CALENDAR**

27. Administrative Committee (Receive & File) **Chair: Burke Wallerstein/3131**

28. Special Administrative Committee (Receive & File) **Chair: Burke Wallerstein/3131**



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|-----|---|---------------------------|---------------|
| 29. | Legislative Committee (Receive & File)                                  | Chair: Mitchell           | Smith/3242    |
| 30. | Mobile Source Committee (Receive & File)                                | Chair: Parker             | Fine/2239     |
| 31. | Stationary Source Committee (Receive & File)                            | Chair: Yates              | Nazemi/2662   |
| 32. | Technology Committee (Receive & File)                                   | Chair: J. Benoit          | Miyasato/3249 |
| 33. | Special Technology Committee (Receive & File)                           | Chair: J. Benoit          | Miyasato/3249 |
| 34. | Mobile Source Air Pollution Reduction Review Committee (Receive & File) | Board Liaison: Antonovich | Hogo/3184     |
| 35. | California Air Resources Board Monthly Report (Receive & File)          | Board Rep: Mitchell       | McDaniel/2500 |

**Staff Presentation/Board Discussion**

- |     |  |  |             |
|-----|--|--|-------------|
| 36. | Status Report on Regulation XIII – New Source Review |  | Nazemi/2662 |
|-----|--|--|-------------|

This report presents the federal Final Determination of Equivalency for January 2013 through December 2013. As such, it provides information regarding the status of Regulation XIII – New Source Review in meeting federal NSR requirements and shows that SCAQMD's NSR program is in final compliance with applicable federal requirements from January 2013 through December 2013. (Reviewed: Stationary Source Committee, July 24, 2015)

**PUBLIC HEARINGS**

- |     |  |  |           |
|-----|--|--|-----------|
| 37. | Amend Rule 1148.1 – Oil and Gas Production Wells ( <i>Continued from July 10, 2015 Board Meeting</i> ) |  | Fine/2239 |
|-----|--|--|-----------|

The proposed amendment seeks to provide enforceable mechanisms to reduce odor nuisance potential from emissions associated with oil and gas production facility operations and also updates rule language to promote clarity, consistency and enforceability. The proposed amendment: requires use of odor mitigation best practices; requires facilities located within 1,500 feet of a sensitive receptor to conduct and submit a specific cause analysis for any confirmed odor event; and requires facilities with continuing odor issues to develop and implement an approved Odor Mitigation Plan. This action is to adopt the resolution: 1) Certifying the Final Environmental Assessment for Proposed Amended Rule 1148.1 - Oil and Gas Production Wells; and 2) Amending Rule 1148.1 - Oil and Gas Production Wells. (Reviewed: Stationary Source Committee, February 20 and April 17, 2015)

38. Amend Rule 1148.2 - Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers (*Continued from July 10, 2015 Board Meeting for Board Deliberation and Action Only*) **Fine/2239**

Rule 1148.2 was adopted April 5, 2013 to establish requirements for owners or operators of oil and gas wells to notify the Executive Officer when conducting well drilling, well reworking, hydraulic fracturing, and other well production stimulation activities. The rule also includes reporting requirements for operators and chemical suppliers to report trade secret and non-trade secret chemicals used. The California Department of Conservation, through its Division of Oil, Gas, and Geothermal Resources (DOGGR) has approved Well Stimulation Treatment Regulations in response to the passage of SB 4 on December 30, 2014. Chemical reporting requirements for chemicals claimed as trade secret are different between the new DOGGR regulation and Rule 1148.2. Proposed Amended Rule 1148.2 includes revisions to the chemical reporting requirements to be consistent with DOGGR's regulation. This action is to adopt the resolution: 1) Determining that the proposed amendments to Rule 1148.2 are exempt from the CEQA; and 2) Amending Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers. (Reviewed: Stationary Source Committee, April 17, 2015)

39. Amend Rule 1156 – Further Emission Reductions from Cement Manufacturing Facilities **Fine/2239**

The proposed amendment seeks to minimize hexavalent chromium (Cr+6) emissions and risk from cement manufacturing operations and the property after facility closure while streamlining Cr+6 ambient monitoring. The proposed amendments will establish the conditions under which monitoring can be reduced or eliminated. In addition, the proposed amendments include a proposed modification to the fence-line ambient Cr+6 threshold to reflect changes made by the Office of Environmental Health Hazard Assessment to risk assessment guidelines, as well as proposing minor revisions. This action is to adopt the resolution: 1) Certifying the Final Environmental Assessment for Proposed Amended Rule 1156 – Further Reductions of Particulate Emissions from Cement Manufacturing Facilities; and 2) Amending Rule 1156 – Further Reductions of Particulate Emissions from Cement Manufacturing Facilities. (Reviewed: Stationary Source Committee, April 17, 2015)

40. Adopt Proposed Rule 415 - Odors from Rendering Facilities **Whynot/3104**

***Staff is recommending that the public hearing on this item be continued to the November 6, 2015 Board Meeting.***

PR 415 is designed to reduce odors from facilities conducting inedible rendering operations. PR 415 is the result of an issue that was identified by the Working Group for the Clean Communities Plan in the pilot study area of Boyle Heights, a community near the City of Vernon rendering facilities. PR 415 includes implementation of Best Management Practices, enclosure for process areas that have high potential for odors, closed system requirements, as well as other measures to control odors from rendering operations. This action is to adopt the resolution: 1) Certifying the Final Environmental Assessment for Proposed Rule 415 - Odors from Rendering Facilities; and 2) Adopting Rule 415 – Odors from Rendering Facilities. (Reviewed: Stationary Source Committee, February 20 and May 15, 2015)

41. Amend Rule 1420.1 – Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities **Fine/2239**

In March 2015, the Board adopted amendments to Rule 1420.1, lowering the ambient lead concentration limit and adding other housekeeping and maintenance measures. At the March Board Hearing, staff was directed to return to the Board with a rule proposal to lower the point source lead emission rate to 0.003 lb/hr and other options. Proposed Amended Rule 1420.1 will lower the point source emission rate and include provisions to ensure emissions from lead are appropriately controlled during closure and clean-up activities of a large lead-acid battery recycling facility. This action is to adopt the resolution: 1) Certifying the Final Subsequent Environmental Assessment for Proposed Amended Rule 1420.1 – Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities; and 2) Amending Rule 1420.1 – Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities. (Reviewed: Stationary Source Committee, June 19, 2015)

42. Adopt Proposed Rule 1420.2 – Emission Standards for Lead from Metal Melting Facilities **Fine/2239**

***Staff is recommending that the public hearing on this item be continued to the October 2, 2015 Board Meeting.***

On October 15, 2008, the U.S. EPA signed into legislation an amended National Ambient Air Quality Standard (NAAQS) for lead. This legislation lowered the NAAQS for lead from 1.5 µg/m<sup>3</sup> to 0.15 µg/m<sup>3</sup> averaged over a rolling 3-month period to protect public health and the environment. The SCAQMD staff is proposing Rule 1420.2 – Emission Standards for Lead from Metal Melting Facilities to protect public health from exposure to lead and help ensure and maintain attainment of the NAAQS. The SCAQMD staff is proposing an initial ambient air lead concentration limit of 0.150 µg/m<sup>3</sup> averaged over any consecutive 30 days which will be lowered to a final limit of 0.100 µg/m<sup>3</sup> by 2018. The proposed rule also establishes requirements for enclosures, point source lead emission limits, source testing, ambient air monitoring, housekeeping and maintenance activities, and submittal and implementation of a Compliance Plan if the facility exceeds ambient air lead concentration limits set forth in the rule. This action is to adopt the resolution: 1) Certifying the Final Environmental Assessment for Proposed Rule 1420.2 – Emission Standards for Lead from Metal Melting Facilities; and 2) Adopting Rule 1420.2 – Emission Standards for Lead from Metal Melting Facilities. (Reviewed: Stationary Source Committee, May 15 and June 19, 2015)

### **OTHER BUSINESS**

43. 2016 Air Quality Management Plan White Papers **Fine/2239**

Eight of ten white papers have been completed providing scientific background and policy considerations that will inform the development of the 2016 Air Quality Management Plan. The white papers incorporate feedback and comments from working groups and members of the public. The white paper topics include a Blueprint for Clean Air, PM Controls, VOC Controls, Passenger Transportation, Goods Movement, Off-Road Equipment, Residential/Commercial Energy Use, and a Business Case for Clean Air Strategies. Each topic was presented to the appropriate Board Committee for review. The white papers are being released today for a final public review. The Board will receive public comments at the October 2, 2015 Board Meeting.

**PUBLIC COMMENT PERIOD – (Public Comment on Non-Agenda Items, Pursuant to Government Code Section 54954.3)**

### **BOARD MEMBER TRAVEL – (No Written Material)**

Board member travel reports have been filed with the Clerk of the Boards, and copies are available upon request.

**CLOSED SESSION - (No Written Material)**

Wiese/3460

CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION

It is necessary for the Board to recess to closed session pursuant to Government Code section 54956.9(a) and 54956.9(d)(1) to confer with its counsel regarding pending litigation which has been initiated formally and to which the SCAQMD is a party. The actions are:

- California Nozzle Specialists, Inc. v. SCAQMD, Los Angeles County Superior Court Case No. BS152037 (Public Records Act);
- CBE, CCAT v. EPA, U.S. Court of Appeals, Ninth Circuit, Case No. 12-72358 (1315);
- People of the State of California, ex rel SCAQMD v. Exide Technologies, Inc., Los Angeles Superior Court Case No. BC533528;
- In the Matter of SCAQMD v. Exide Technologies, Inc., SCAQMD Hearing Board Case No. 3151-29 (Order for Abatement);
- Exide Technologies, Inc., Petition for Variance, SCAQMD Hearing Board Case No. 3151-31;
- In re: Exide Technologies, Inc., U.S. Bankruptcy Court for the District of Delaware Case No. 13-11482 (KJC) (Bankruptcy case);
- Fast Lane Transportation, Inc. et al. v. City of Los Angeles, et al., Contra Costa County Superior Court Case No. MSN14-0300 (formerly South Coast Air Quality Management District v. City of Los Angeles, et al., Los Angeles Superior Court Case No. BS 143381) (SCIG);
- Friends of the Eel River v. North Coast Railway Authority, California Supreme Court Case No. S222472 (amicus brief);
- Physicians for Social Responsibility, et al. v. U.S. EPA, U.S. Court of Appeals, Ninth Circuit, Case No. 14-73362 (1-Hour ozone);
- SCAQMD v. U.S. EPA, U.S. Court of Appeals, Ninth Circuit, Case No. 13-73936 (Morongo Redesignation);
- SCAQMD v. U.S. EPA, U.S. Court of Appeals, Ninth Circuit, Case No. 15-71600 (Pechanga Redesignation);
- Sierra Club v. County of Fresno, California Supreme Court Case No. S219783 (amicus brief);
- Sierra Club, et al. v. U.S. EPA, U.S. District Court for Northern District of California Case No. 3:14-CV-04596 (PM2.5 designation to serious); and
- WildEarth Guardians v. U.S. EPA, D.C. Circuit Court Case No. 14-1145 (PM2.5 moderate designation).

CONFERENCE WITH LEGAL COUNSEL – INITIATING LITIGATION

It is also necessary for the Board to recess to closed session pursuant to Government Code section 54956.9(a) and 54956.9(d)(4) to consider initiation of litigation (three cases).

CONFERENCE WITH LEGAL COUNSEL – ANTICIPATED LITIGATION

It is also necessary for the Board to recess to closed session pursuant to Government Code section 54956.9(b) due to significant exposure to litigation (one case).

**ADJOURNMENT**

**\*\*\*PUBLIC COMMENTS\*\*\***

Members of the public are afforded an opportunity to speak on any listed item before or during consideration of that item. Please notify the Clerk of the Board, (909) 396-2500, if you wish to do so. All agendas are posted at SCAQMD Headquarters, 21865 Copley Drive, Diamond Bar, California, at least 72 hours in advance of the meeting. At the end of the agenda, an opportunity is also provided for the public to speak on any subject within the SCAQMD's authority. Speakers may be limited to three (3) minutes each.

Note that on items listed on the Consent Calendar and the balance of the agenda any motion, including action, can be taken (consideration is not limited to listed recommended actions). Additional matters can be added and action taken by two-thirds vote, or in the case of an emergency, by a majority vote. Matters raised under Public Comments may not be acted upon at that meeting other than as provided above.

Written comments will be accepted by the Board and made part of the record, provided 25 copies are presented to the Clerk of the Board. Electronic submittals to [cob@aqmd.gov](mailto:cob@aqmd.gov) of 10 pages or less including attachment, in MS WORD, plain or HTML format will also be accepted by the Board and made part of the record if received no later than 5:00 p.m., on the Tuesday prior to the Board meeting.

## ACRONYMS

AQIP = Air Quality Investment Program	NGV = Natural Gas Vehicle
AQMP = Air Quality Management Plan	NOx = Oxides of Nitrogen
AVR = Average Vehicle Ridership	NSPS = New Source Performance Standards
BACT = Best Available Control Technology	NSR = New Source Review
Cal/EPA = California Environmental Protection Agency	OEHHA = Office of Environmental Health Hazard Assessment
CARB = California Air Resources Board	PAMS = Photochemical Assessment Monitoring Stations
CEMS = Continuous Emissions Monitoring Systems	PAR = Proposed Amended Rule
CEC = California Energy Commission	PEV = Plug-In Electric Vehicle
CEQA = California Environmental Quality Act	PHEV = Plug-In Hybrid Electric Vehicle
CE-CERT =College of Engineering-Center for Environmental Research and Technology	PM10 = Particulate Matter ≤ 10 microns
CNG = Compressed Natural Gas	PM2.5 = Particulate Matter ≤ 2.5 microns
CO = Carbon Monoxide	PR = Proposed Rule
CTG = Control Techniques Guideline	RFP = Request for Proposals
DOE = Department of Energy	RFQ = Request for Quotations
EV = Electric Vehicle	SCAG = Southern California Association of Governments
FY = Fiscal Year	SIP = State Implementation Plan
GHG = Greenhouse Gas	SOx = Oxides of Sulfur
HRA = Health Risk Assessment	SOON = Surplus Off-Road Opt-In for NOx
LEV = Low Emission Vehicle	SULEV = Super Ultra Low Emission Vehicle
LNG = Liquefied Natural Gas	TCM = Transportation Control Measure
MATES = Multiple Air Toxics Exposure Study	ULEV = Ultra Low Emission Vehicle
MOU = Memorandum of Understanding	U.S. EPA = United States Environmental Protection Agency
MSERCs = Mobile Source Emission Reduction Credits	VMT = Vehicle Miles Traveled
MSRC = Mobile Source (Air Pollution Reduction) Review Committee	VOC = Volatile Organic Compound
NATTS =National Air Toxics Trends Station	ZEV = Zero Emission Vehicle
NESHAPS = National Emission Standards for Hazardous Air Pollutants	

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BOARD MEETING DATE: September 4, 2015

AGENDA NO. 1

MINUTES: Governing Board Monthly Meeting

SYNOPSIS: Attached are the Minutes of the July 10, 2015 meeting.

RECOMMENDED ACTION:

Approve Minutes of the July 10, 2015 Board Meeting.

Sandra McDaniel,  
Clerk of the Boards

SM:dg

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**FRIDAY, JULY 10, 2015**

Notice having been duly given, the regular meeting of the South Coast Air Quality Management District Board was held at District Headquarters, 21865 Copley Drive, Diamond Bar, California. Members present:

William A. Burke, Ed.D., Chairman  
Speaker of the Assembly Appointee

Mayor Dennis R. Yates, Vice Chairman  
Cities of San Bernardino County

Mayor Michael D. Antonovich  
County of Los Angeles

Mayor Ben Benoit  
Cities of Riverside County

Supervisor John J. Benoit  
County of Riverside

Councilmember Joe Buscaino  
City of Los Angeles

Councilmember Michael A. Cacciotti  
Cities of Los Angeles County – Eastern Region

Dr. Joseph K. Lyou  
Governor's Appointee

Councilmember Judith Mitchell  
Cities of Los Angeles County – Western Region

Dr. Clark E. Parker, Sr.  
Senate Rules Committee Appointee

Mayor Miguel A. Pulido (left at 12:15 p.m.)  
Cities of Orange County

Supervisor Janice Rutherford  
County of San Bernardino

Member absent:

Supervisor Shawn Nelson  
County of Orange

**CALL TO ORDER:** Chairman Burke called the meeting to order at 9:00 a.m.

- Pledge of Allegiance: Led by Mayor Yates.
- Opening Comments

Councilman Cacciotti. Explained that he attended the Electric Lawn Mower Exchange at the Santa Anita Park on June 20, 2015. He displayed photographs taken throughout the trade-in process and commended staff for their efforts in coordinating a successful event.

Dr. Wallerstein. Noted that staff was recommending that the consideration of Rule 1148.1 be continued until the September 4, 2015 meeting due to a problem when the file was uploaded to the internet with the meeting agenda package where the boxes that were checked on the environmental checklist of the CEQA documentation were not displayed properly.

- Introduction of Sunline Transit Agency CEO/General Manager, Lauren L. Skiver

Supervisor Benoit introduced Lauren Skiver, Executive Director of Sunline Transit Agency, and explained that they are the main transit company for the Coachella Valley and are a leader in eco-friendlier transportation.

Ms. Skiver highlighted multiple projects that have been made possible with the support of the SCAQMD and noted that the entire Sunline fleet is made up of alternatively-fueled vehicles.

- Presentation of Retirement Award to Ernest Lopez and Gwen Cole

Mayor Yates presented a retirement award to Ernest Lopez, Air Quality Specialist, in recognition of 31 years of dedicated District service.

Chairman Burke presented a retirement award to Gwen Cole, Executive Secretary, in recognition of over 25 years of dedicated District service.

## **CONSENT CALENDAR**

1. Approve Minutes of June 5, 2015 Board Meeting

2. Set Public Hearings September 4, 2015 to Consider Amendments to and/or Adoption of SCAQMD Rules and Regulations
  - A. Adopt Proposed Rule 415 - Odors from Rendering Facilities
  - B. Amend Rule 1420.1 – Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities
  - C. Adopt Proposed Rule 1420.2 – Emission Standards for Lead from Metal Melting Facilities

**Budget/Fiscal Impact**

3. Amend Contract for Media, Advertising and Public Outreach for Check Before You Burn Program
4. Execute Contracts for Two Heavy-Duty CNG Vehicles in Coachella Valley **E**
5. Amend Contract to Provide Additional Funding to Develop and Demonstrate Plug-In Hybrid Vehicles **E**
6. Amend Contract to Provide Additional Funding for Hydrogen Fueling Station Demonstration **E**
7. Issue Program Announcement for Low-Emission Leaf Blower Vendors
8. Issue Program Announcement for Proposition 1B-Goods Movement Emission Reduction Program **E**
9. Recognize Revenue and Appropriate Funds from Clean Fuels, Carl Moyer AB 923 and Proposition 1B-Goods Movement Programs for Administrative Support, Outreach and Education, Capital Outlays, and Related Activities **E**
10. Issue RFP for Enhancement of Web-Based Annual Emissions Reporting Tool
11. Transfer and Appropriate Funds and Issue RFQs and Purchase Orders for Laboratory and Field Equipment

12. Recognize Revenue and Appropriate Funds for Enhanced Particulate Monitoring Programs, NATTS, PAMS, PM2.5, Near-Road NO2 and AQ-SPEC Programs; Issue RFQs and Purchase Orders for Air Monitoring Equipment and CNG Vehicles
13. Execute Contract for Health Insurance Brokerage and Consultant Services
14. Amend Salary Resolution to Provide Paid Sick Leave for SCAQMD Employees Not Currently Eligible to Receive Such Leave Benefits
15. Authorize Purchase of OnBase Software Support
16. Authorize Purchase of Oracle PeopleSoft Software and Support
17. Issue RFP for Legislative Representation in Washington, D.C.
18. Issue RFP for Consultant Services for SCAQMD Environmental Justice Outreach and Initiatives
19. Approve Methodology for Maximum Support Level Expenditure and Amendments to Board Member Assistant and Board Member Consultant Policy
20. Approve Replacement Contract, Exercise Option for Technical Advisor Services, and Approve Fund Transfer for Miscellaneous Costs in FY 2015-16 as Approved by MSRC

**Items 21 through 27 - Information Only/Receive and File**

21. Legislative and Public Affairs Report
22. Report to Legislature and CARB on SCAQMD's Regulatory Activities for Calendar Year 2014
23. Hearing Board Report
24. Civil Filings and Civil Penalties Report

25. Lead Agency Projects and Environmental Documents Received by SCAQMD
26. Rule and Control Measure Forecast
27. Report on Major Projects for Information Management Scheduled to Start During First Six Months of FY 2015-16

Supervisor Benoit announced that he serves on the Board of Directors for the Coachella Valley Associated Governments which is involved with Item No. 4.

Chairman Burke announced his abstention on Item No. 13 because of a financial interest in Wells Fargo Bank.

Agenda Items 2A, 2C, 7 and 9 were withheld for comment and discussion.

MOVED BY J. BENOIT, SECONDED BY B. BENOIT, AGENDA ITEMS 1, 2B, 3 THROUGH 6, 8, AND 10 THROUGH 27 APPROVED AS RECOMMENDED, ADOPTING RESOLUTION NO. 15-15 AMENDING SCAQMD'S SALARY RESOLUTION TO PROVIDE FOR PAID SICK LEAVE FOR BOARD MEMBER ASSISTANTS AND CONSULTANTS ENGAGED AS SCAQMD EMPLOYEES, PROVISIONAL EMPLOYEES, PAID INTERNS, AND THOSE EMPLOYEES NOT COVERED BY AN MOU OR EXCLUDED FROM ELIGIBILITY UNDER SECTION 43 AND RESOLUTION NO. 15-16 AMENDING THE SCAQMD BOARD MEMBER ASSISTANT AND BOARD MEMBER CONSULTANT POLICY AND INCORPORATING THE POLICY INTO SCAQMD ADMINISTRATIVE CODE, BY THE FOLLOWING VOTE:

AYES: Antonovich, B. Benoit, J. Benoit, Burke (*except Item #13*), Buscaino, Cacciotti, Lyou, Mitchell, Parker, Pulido, Rutherford and Yates.

NOES: None.

ABSTAIN: Burke (*Item #13 only*).

ABSENT: Nelson.

28. Items Deferred from Consent Calendar

2. Set Public Hearings September 4, 2015 to Consider Amendments to and/or Adoption of SCAQMD Rules and Regulations

A. Adopt Proposed Rule 415 - Odors from Rendering Facilities

The following individuals addressed the Board on Agenda Item No. 2A.

Cameron Hensley, Coast Packing Company, explained that they are a family-owned business that has operated in Vernon for 93 years and employs approximately 100 employees; expressed their opposition to the proposed rule as it lacks a science-based method to prove where odors originate from; and urged the Board not to set the proposal for hearing on September 4, 2015.

Martin Perez, Teamsters Joint Council 42, urged the Board to thoroughly investigate the odor complaints before basing a rule on them; and stressed that if this rule is adopted many jobs would be at stake.

Jimmy Andreoli II, Baker Commodities, explained that they are a family-owned business that provides an essential service and has been operating in Vernon since 1937 with a total of 215 employees. He expressed opposition to the proposed rule which does not utilize scientific evidence to trace the source of odors and would ultimately lead to the closure of their business due to its immense financial impacts; noted that they have not received any notices of violation in 17 years; commented on the process for confirming a public nuisance with six separate complaints, which will be loosened by the proposed rule which requires just three complaints; and noted that Boyle Heights is surrounded by freeways, rail yards and heavy industry that could be the cause of many odors. He added that their attempts to provide feedback to staff have not led to a change in the proposed rule that will allow them to stay in business. (Submitted Written Comments)

Mayor Yates questioned whether there is a method available to detect the source of a specific odor.

Dr. Fine explained that different types of quantitative or semi-quantitative methods have been investigated to try and make a subjective problem more objective, but that the current measurement methods are not feasible for complaint resolution. He added that a subjective standard is already used in Rule 402 where complaints can lead to action against a facility.

Dr. Wallerstein noted that the proposal to take action after three complaints is meant to initiate a dialogue with the business to detect the source of the odor to potentially avoid the issuance of a notice of violation, which still would require six separate complaints.

Supervisor Benoit expressed concern that businesses could potentially be impacted to the extent that many jobs are lost as a result of a rule that is based on subjective odor complaints, and urged for additional time to be taken if necessary prior to submittal to the Board for consideration.

Supervisor Antonovich stressed the importance of working with businesses to ensure that they provide a safe work environment and that they can stay in business and continue to contribute to the local economy.

Dr. Wallerstein noted that the purpose of this item is to set the proposal for hearing at the September 4, 2015, where concerns could be voiced and discussion could take place once all of the evidence is conveyed. He added that staff intends to continue to work with stakeholders on this matter.

Mayor Mitchell commented on the essential benefit that Baker Commodities provides by producing biofuels; and urged staff to work closely with these companies to determine what kind of mitigation measures could be put into place that are cost-effective and will not lead to any business closures.

Chairman Burke suggested that if more time is necessary to fully vet the methods used and the ramifications of the rule that staff delay bringing the rule proposal to the Board.

MOVED BY CACCIOTTI, SECONDED BY  
LYOU, AGENDA ITEM 2A APPROVED AS  
RECOMMENDED, BY THE FOLLOWING  
VOTE:

AYES: Antonovich, B. Benoit, J. Benoit,  
Burke, Buscaino, Cacciotti, Lyou,  
Mitchell, Parker, Pulido,  
Rutherford and Yates.

NOES: None.

ABSENT: Nelson.

C. Adopt Proposed Rule 1420.2 – Emission Standards for Lead from Metal Melting Facilities

The following individuals addressed the Board on Agenda Item No. 2C.

David Weinberg, Battery Council International, explained that they represent lead-acid battery manufacturers in the U.S. including Trojan Battery, U.S. Battery, Concorde Battery and Ramcar who are located in the SCAQMD basin. He requested that the Board not set the proposed rule for hearing at this time, as the socioeconomic analysis and CEQA analysis have not been released, and further revisions are necessary. (Submitted Written Comments)

Terry Campbell, U.S. Battery Manufacturing, stressed the importance of recognizing the differences between manufacturers and the battery recycling facilities and not simply copying Rule 1420.1 to apply it to the manufacturers; and requested more time to collaborate with staff to prepare a proposal that is more amenable to the stakeholders.

Mark Olsen, Gerdau, expressed appreciation for the collaboration that has occurred with staff on this proposal and their dedication to continued discussions; and noted that they have invested in technology that will help achieve the region's air quality goals.

MOVED BY YATES, SECONDED BY CACCIOTTI, AGENDA ITEM 2C APPROVED AS RECOMMENDED, BY THE FOLLOWING VOTE:

AYES: Antonovich, B. Benoit, J. Benoit, Burke, Buscaino, Cacciotti, Lyou, Mitchell, Parker, Pulido, Rutherford and Yates.

NOES: None.

ABSENT: Nelson.

7. Issue Program Announcement for Low-Emission Leaf Blower Vendors

Councilman Cacciotti noted that, for the first time, the outreach will include a component that would allow for zero-emission leaf blowers to possibly be included in the exchange and requested staff to elaborate on the announcement process.



Fred Minassian, Assistant DEO/Technology Advancement, confirmed that staff expects to receive proposals for electric leaf blowers and will evaluate those proposals by determining the battery life, charging time, air flow and the commercial reliability and acceptability of the product by the landscapers.

In response to Dr. Parker's concern that the equipment will be compared unfairly, Dr. Matt Miyasato, DEO/Technology Advancement, explained that the proposals will be rated and compared on a like-for-like basis, so the gasoline leaf blowers will be compared to other gasoline leaf-blowers and the electric leaf-blowers will be compared to other electric leaf-blowers.

Councilman Cacciotti introduced Dan Mabe from Greenstation who gave an update on the demonstration of electric leaf blowers in Garfield Park. He noted that the lawn care workers have indicated that while they like the performance of the handheld blower, it only performed for five to seven minutes at peak wattage, and therefore, a backpack would likely be necessary for them to be used in a commercial setting.

MOVED BY CACCIOTTI, SECONDED BY PARKER, AGENDA ITEM 7 APPROVED AS RECOMMENDED, BY THE FOLLOWING VOTE:

AYES: Antonovich, B. Benoit, J. Benoit, Burke, Buscaino, Cacciotti, Lyou, Mitchell, Parker, Pulido, Rutherford and Yates.

NOES: None.

ABSENT: Nelson.

9. Recognize Revenue and Appropriate Funds from Clean Fuels, Carl Moyer AB 923 and Proposition 1B-Goods Movement Programs for Administrative Support, Outreach and Education, Capital Outlays, and Related Activities



Councilman Cacciotti questioned how the decision is made on which vehicles will be acquired and whether they will be leased or purchased; and suggested acquiring longer distance plug-in hybrid vehicles in addition to the other advanced technologies that may be considered.

Dr. Miyasato replied that the type of vehicle selected and whether the vehicle is leased or purchased, depends on the needs of who it will be

assigned to; and confirmed that staff would take input from the Board on which vehicles they would like to demonstrate.

MOVED BY CACCIOTTI, SECONDED BY PULIDO, AGENDA ITEM 9 APPROVED AS RECOMMENDED, BY THE FOLLOWING VOTE:

AYES: Antonovich, B. Benoit, J. Benoit, Burke, Buscaino, Cacciotti, Lyou, Mitchell, Parker, Pulido, Rutherford and Yates.

NOES: None.

ABSENT: Nelson.

**BOARD CALENDAR**

- 29. Administrative Committee
- 30. Special Administrative Committee
- 31. Investment Oversight Committee
- 32. Legislative Committee
- 33. Mobile Source Committee
- 34. Stationary Source Committee
- 35. Technology Committee
- 36. Mobile Source Air Pollution Reduction Review Committee
- 37. California Air Resources Board Monthly Report

MOVED BY PULIDO, SECONDED BY CACCIOTTI, AGENDA ITEMS 29 THROUGH 37 APPROVED AS RECOMMENDED, RECEIVING AND FILING THE COMMITTEE, MSRC AND CARB REPORTS, AND ADOPTING THE POSITIONS ON LEGISLATION AS SET FORTH BELOW, BY THE FOLLOWING VOTE:

AYES: Antonovich, B. Benoit, J. Benoit, Burke, Buscaino, Cacciotti, Lyou, Mitchell, Parker, Pulido, Rutherford and Yates.

NOES: None.

ABSENT: Nelson.

<b>Agenda Item</b>	<b>Recommendation</b>
Issue RFP for Legislative Representation in Washington, D.C	Approve
SB 398 (Leyva) Green Assistance Program	Support
SB 400 (Lara) California Global Warming Solutions Act of 2006: Greenhouse Gas Reduction Fund	Support with Amendments
Greenhouse Gas Reduction Fund Investment Principles	Approve

**PUBLIC HEARINGS**

- 38. Amend Rule 1148.1 – Oil and Gas Production Wells (*Continued from June 5, 2015 Board Meeting*)

Naveen Berry, Planning and Rules Manager, gave the staff presentation.

The public hearing was opened and the following individuals addressed the Board on Agenda Item 38.

**JUDITH LOPEZ, IBEW Local 11**

Explained that the oil and gas industry in Los Angeles County alone generates millions of dollars annually, which provides many economic benefits including employing approximately 104,000 individuals.

TOMMY FAAVAE, IBEW Local 11

Expressed opposition the proposed amendments that will affect many jobs throughout the region; and noted that legislation is already in place that makes California energy production the most regulated and transparent in the county.

DR. TOM WILLIAMS, Citizens Coalition for Safe Community

Suggested the use of a standardized method for odor reports to be made to streamline the process.

YVONNE WATSON, Sierra Club

Commented on the public reporting process noting that those who report odors are doing so because they are concerned by the odor; encouraged a more in depth public outreach campaign to educate people on the reporting process; and stressed the importance of highly-visible notification signage in the community.

JOE GALLIANI, South Bay 350 Climate Action Group

Expressed support for the amendments and suggested strengthening the regulations even further; and suggested that if there is a concern for the loss of jobs, workers in the fossil fuel industry should be transitioned to clean energy jobs. (Submitted Written Comments)

SAMUEL SUKATON Sierra Club

Noted that he resides near the Allen Co drill site and has seen his neighbors and friends experience nose bleeds, headaches and other ill effects from the site's strong odors; and expressed support for the amendments which provide a foundation that can be further strengthened with BACT requirements.

JULIA MAY, Communities for a Better Environment

Urged the Board to adopt the staff recommendation as a first step to protect public health and to further strengthen the rule by requiring an oil mitigation plan from all well drilling operations; and detailed the effects those in surrounding communities face including severe odors, continual flaring, large amounts truck and diesel equipment traffic, pounding and cracking noises, and associated air emissions. (Submitted Written Comments)

DARYL GALE, Los Angeles Resident

Noted that since the nation is still dependent upon oil for energy needs, it is imperative to protect the health and safety of the workers and the residents who live near oil production sites; and urged for each and every odor complaint to be investigated and mitigated.

ALICIA RIVERA, Communities for a Better Environment

MARITZA VILLARRAGA, Torrance Resident

Expressed support for this rule that will assist those that are affected by oil drilling in their communities; and urged for more stringent measures to be imposed, including a BACT requirement. They added that additional community outreach is required so that residents know how to report odor complaints.

LINDA BASSETT, Gulf Avenue Elementary School

Noted that as a result of being located near a refinery, she smells sulfur odors upon arriving at the school each day; explained that she often sees the following symptoms from her young students: nosebleeds, stomachaches, headaches, sneezing and coughing; and urged the Board to do as much as possible to address unhealthy air quality in these communities.

GLORIA GUZMAN, Wilmington Resident

\*SYLVIA ARRENDONDO, Mujeres Unidas: Womyn of Wilmington

RAMONA FLORES, Wilmington Resident

\*ASHLEY HERNANDEZ, Communities for a Better Environment/Youth for Environmental Justice

\*MONIC URIARTE, People Not Pozos and Esperanza Community Housing

EVELYN VIVEROS, Wilmington Resident

Explained the negative health effects that they experience as residents of Wilmington and the surrounding area; urged for the adoption of a stringent rule, which includes a 72-hour notification requirement. \*Submitted Written Comments

Dr. Wallerstein noted that complaints that are received during working hours are responded to as quickly as possible, and those complaints received during off-hours may also receive immediate attention depending upon the nature of the complaint. He clarified that the requirement that complaints be received from six households, is in reference to finding that a company is creating a public nuisance and therefore can be issued a notice of violation.

Written Comments Submitted by:

Alexandra Nagy, Food & Water Watch

Allen Hernandez, Sierra Club

Sandra Burkhart, Western States Petroleum Association

California Nurses Association

The public hearing remained open until the September 4, 2015 meeting, with the exception of those who previously testified or submitted comments.

AGENDA ITEM 38 WAS CONTINUED TO THE SEPTEMBER 4, 2015 BOARD MEETING AT STAFF'S RECOMMENDATION AND WITH THE CHAIRMAN'S CONCURRENCE. THE BOARD WILL RECEIVE TESTIMONY ONLY FROM PERSONS NOT TESTIFYING AT THE JULY 10, 2015 PUBLIC HEARING.

39. Amend Rule 1148.2 - Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers (*Continued from June 5, 2015 Board Meeting*)

Dr. Philip Fine, DEO/Planning and Rules, gave the staff presentation.

Dr. Lyou asked staff to clarify the status of the request for Spanish language notifications, as it was listed as initiated process to provide Spanish translation.

Dr. Fine replied that the translation of the notifications is in the final stages and the Spanish language notification will be available in the near future.

The public hearing was opened and the following individuals addressed the Board on Agenda Item 39.

JOE GALLIANI, South Bay 350 Climate Action Group

Emphasized the importance of community outreach to the communities that are unfairly subjected to the effects of hydraulic fracturing; and urged the Board to proceed with caution as the full impacts of these practices are not fully known. (Submitted Written Comments)

Councilwoman Mitchell acknowledged Chairman Burke's contribution to this effort by bringing the issue of fracturing activities to the forefront for further investigation.

DARYL GALE, Los Angeles Resident

Stressed the importance of providing residents who live near active oil and gas wells information as to what chemicals they will be exposed to and when these activities will be occurring.

JULIA MAY, Communities for a Better Environment

Stressed the importance of providing information to the public; detailed shortfalls that have been found among injection well operations; and urged the Board to further regulate this industry. (Submitted Written Comments)

RICHARD PARKS, Redeemer Community Partnership

Urged the Board to amend Rule 1148.2 to include injection well events and to do all they can to protect public health; and showed photographs of one of the drill sites that is within a few feet of homes where trucks with danger warnings can be seen and workers clothed in protective gear are present; an additional photo showed dead plant life outside of the drill site of Freeport-McMoRan. (Submitted Written Comments)

DR. TOM WILLIAMS, Citizens Collation for a Safe Community  
GLADYS LIMON, Communities for a Better Environment  
SAMUEL SUKATON, Sierra Club

Encouraged the Board to take action on this Rule today to protect those living and working in the affected areas; and noted that the rule should include injection well events, a 72-hour notice requirement, and a provision for notification and signage to be provided in foreign languages.

(Mayor Pulido left at 12:15 p.m.)

PAT GORSKI, Freeport – McMoRan Oil & Gas

Noted that the vegetation near their site had browned as a result of over-fertilization and not because of any well activity.

LINDA BASSETT, Gulf Avenue Elementary School

Expressed support for increased regulation of oil wells; and suggested utilizing schools as a conduit to distribute notification information.

SANDY NAVARRO, Esperanza Community Housing and People Not Pozos

Detailed the negative health effects she has witnessed in her community; and urged the Board to do all it can to protect public health. (Submitted Written Comments)

YVONNE WATSON, Sierra Club

\*JACK EIDT, Tar Sands Action SoCal

Noted the importance of continuing to enact protective measures and holding oil companies accountable. \*(Submitted Written Comments)

SANDRA BURKHART, Western States Petroleum Association

Explained that the rule was originally proposed as a temporary measure to require reporting of planned well work over a two-year period so that staff could learn more about these operations and analyze whether emissions of criteria pollutants or toxic air contaminants were coming from those wells, and in turn, staff would return to the Board with its recommendations on the need for a rule based on that data, however, now the rule is being extended and modified beyond its original intent; and expressed concerns with the 72-hour advanced notice requirement. (Submitted Written Comments)

BLAIR KNOX, California Independent Petroleum Association

Explained CIPA's involvement through the rule development process; and expressed concern with the limit of 5 extensions to the 72-hour notice requirement. (Submitted Written Comments)

JESSE MARQUEZ, Coalition for a Safe Environment

Commented that the public has a right to know the public health, public safety and environmental impacts associated with oil well activities. (Submitted Written Comments)

NICOLE WONG, Redeemer Community Partnership

Noted that the plants located on the Freeport-McMoRan property that all died within one day were the result of an unreported injection well event in the opinion of a plant pathologist who was shown photographs of the plants. She urged the Board to enact amendments to Rule 1148.2 and include the reporting requirement for injection wells.

JIM STEWART, Sierra Club

Stressed the importance of a regulation that includes injection wells and requires notification that clearly conveys the time activity will occur so that residents have an opportunity to leave the area.

Written Comments Submitted by:

Alexandra Nagy, Food & Water Watch  
Allen Hernandez, Sierra Club  
California Nurses Association

There being no further public testimony on this item, the public hearing was closed.

AT THE CHAIRMAN'S DIRECTION AGENDA  
ITEM 39, WAS CONTINUED TO THE  
SEPTEMBER 4, 2015 BOARD MEETING FOR  
BOARD DELIBERATION AND ACTION ONLY.

**OTHER BUSINESS**

40. Request to U.S. EPA to Reclassify South Coast Air Basin as Serious Nonattainment for 24-hour PM2.5 NAAQS

Dr. Wallerstein noted that staff is requesting approval by the Board.

Dr. Tom Williams, Citizens Coalition for a Safe Community, addressed the Board on Item No. 40 requesting that more detail be included to quantify what percentage of PM2.5 emissions are the federal responsibility; and suggested that staff address the effect of rainfall on PM2.5 levels as it will be a long-term concern.

Supervisor Benoit suggested addressing the need for reductions among federal sources at the beginning of the letter to highlight the burden that is being placed on local sources.

Dr. Wallerstein confirmed that the suggested change would be made to the final letter.



MOVED BY YATES, SECONDED BY J. BENOIT, AGENDA ITEM NO. 40 APPROVED AS RECOMMENDED BY STAFF, BY THE FOLLOWING VOTE:

AYES: Antonovich, B. Benoit, J. Benoit, Burke, Buscaino, Lyou, Mitchell, Parker, Rutherford and Yates.

NOES: None.

ABSENT: Cacciotti, Nelson and Pulido.

**PUBLIC COMMENT PERIOD** – (Public Comment on Non-Agenda Items, Pursuant to Government Code Section 54954.3)

Dr. Tom Williams, Sierra Club Transportation Committee and Citizens Coalition for a Safe Community, inquired about the status of SCAQMD's comments in response to the EIR for the 710 tunnel vent project and requested copies of any such comments.

Allen Hernandez, Marina Barragén, Raul del Zendejas, Christopher Avila, Selene Hernandez, Cynthia Portillo and Consuelo Baez, Sierra Club, explained the hardships they face as residents of the Coachella Valley; and urged the Board to develop a robust NOx RECLAIM regulation to protect public health.

Supervisor Benoit thanked the speakers from the Coachella Valley for taking the time to attend the meeting and express their concerns.

Joseph Sanchez addressed the Board regarding his employment status with the District which the Board would consider during closed session. The following individuals spoke on his behalf: Curtis Stephan, Zach Gifford, Lois Schrader, Rick Kotzin, Alex Perez, Joel Morales and Ciria Sanchez.

**CLOSED SESSION**

The Board recessed to closed session at 1:35 p.m., pursuant to Government Code sections:

- 54956.9(a) and 54956.9(d)(1) to confer with its counsel regarding pending litigation which has been initiated formally and to which the District is a party, as follows:

CBE, CCAT v. EPA, U.S. Court of Appeals, Ninth Circuit, Case No. 12-72358 (1315);

Communities for a Better Environment, et al. v. U.S. EPA, et al., U.S. Court of Appeals, Ninth Circuit, Case No. 13-70167 (Sentinel);

People of the State of California, ex rel SCAQMD v. Exide Technologies, Inc., Los Angeles Superior Court Case No. BC533528;

In the Matter of SCAQMD v. Exide Technologies, Inc., SCAQMD Hearing Board Case No. 3151-29 (Order for Abatement);

Exide Technologies, Inc., Petition for Variance, SCAQMD Hearing Board Case No. 3151-31; and

In re: Exide Technologies, Inc., U.S. Bankruptcy Court for the District of Delaware Case No. 13-11482 (KJC) (Bankruptcy case).

- 54957 regarding public employee discipline/dismissal/release.

Following closed session, General Counsel Kurt Wiese announced that a report of any reportable actions taken in closed session will be filed with the Clerk of the Board and made available upon request.

## **ADJOURNMENT**

There being no further business, the meeting was adjourned by Kurt Wiese at 2:20 p.m.

The foregoing is a true statement of the proceedings held by the South Coast Air Quality Management District Board on July 10, 2015.

Respectfully Submitted,

Denise Garzaro  
Senior Deputy Clerk

Date Minutes Approved: \_\_\_\_\_

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Dr. William A. Burke, Chairman

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## ACRONYMS

AQMP = Air Quality Management Plan

AQ – SPEC = Air Quality Sensor Performance Evaluation Center

BACT = Best Available Control Technology

CARB = California Air Resources Board

CNG = Compressed Natural Gas

EIR = Environmental Impact Report

FY = Fiscal Year

MOU = Memorandum of Understanding

MSRC = Mobile Source (Air Pollution Reduction) Review Committee

NATTS = National Air Toxics Trends Station

NO<sub>x</sub> = Oxides of Nitrogen

PAMS = Photochemical Assessment Monitoring Stations

PM<sub>2.5</sub> = Particulate Matter  $\leq$  2.5 microns

RFP = Request for Proposals

RFQ = Request for Quotations

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BOARD MEETING DATE: September 4, 2015

AGENDA NO. 2

**PROPOSAL:** Set Public Hearing October 2, 2015 to Consider Amendments and/or Adoption to SCAQMD Rules and Regulations

Amend Rule 1106 – Marine and Pleasure Craft Coating Operations and Rescind Rule 1106.1 – Pleasure Craft Coating Operations. The proposed amendment to Rule 1106 subsumes the requirements of Rule 1106.1, and revises VOC content limits for pretreatment wash primers, antenna repair and maintenance thermoplastic, inorganic zinc, and specialty marking coatings in order to align limits with U.S. EPA Control Techniques Guidelines and other California air districts, and adds new categories for marine aluminum antifoulant, mist, nonskid and organic zinc coatings and marine deck primer sealant. The proposed amendment also adds provisions for pollution prevention measures, enhanced enforceability, and to promote clarity and consistency. (Reviewed: Stationary Source Committee, July 24, 2015)

The complete text of the proposed amendments, staff report and other supporting documents will be available from the District's Public Information Center, (909) 396-2550 and on the Internet ([www.aqmd.gov](http://www.aqmd.gov)) as of September 2, 2015.

**RECOMMENDED ACTION:**

Set public hearing October 2, 2015 to amend Rule 1106 and rescind Rule 1106.1.


Barry R. Wallerstein, D.Env.  
Executive Officer

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BOARD MEETING DATE: September 4, 2015

AGENDA NO. 3

**PROPOSAL:** Recognize and Appropriate Funds and Execute Contract for EV Charging Stations and Service at SCAQMD Headquarters and Release RFP for Installation 

**SYNOPSIS:** The Board previously approved the release of an RFP to upgrade and expand EV charging infrastructure at SCAQMD headquarters. Subsequently, an RFP was released for engineering design services to prepare construction drawings for installation of electrical infrastructure. A contractor was selected and the drawings will serve as a blueprint for installation. These actions are to: 1) recognize and appropriate \$322,425 from the Clean Fuels Fund (31) into Science & Technology Advancement's FY 2015-16 Budget; 2) execute a contract with Broadband TelCom Power, Inc. for EV hardware and control system at SCAQMD headquarters for up to \$322,425 from Science & Technology Advancement's FY 2015-16 Budget; and 3) release an RFP for contractor services to install the new EV charging stations and the required electrical infrastructure at SCAQMD headquarters.

**COMMITTEE:** Technology, July 24, 2015; Recommended for Approval

**RECOMMENDED ACTIONS:**

1. Recognize \$322,425 from the Clean Fuels Fund (31) into the General Fund and appropriate \$322,425 to Science & Technology Advancement's FY 2015-16 Budget, Capital Outlays Major Object, Capital Outlays Account; and
2. Authorize the Chairman to execute a contract with Broadband TelCom Power, Inc. for EV hardware and control system at SCAQMD headquarters in an amount not to exceed \$322,425 from Science & Technology Advancement's FY 2015-16 Budget, Capital Outlays Major Object, Capital Outlays Account; and
3. Issue RFP #P2016-01 to solicit contractor services to install the EV charging stations and required infrastructure at SCAQMD headquarters.

Barry R. Wallerstein, D.Env.  
Executive Officer

## **Background**

Currently, there are 28 Level 2 charging stations and one DC fast charger available for public, fleet and employee use at SCAQMD headquarters. There are over 70 PEVs daily using the charging stations at SCAQMD, and this number is expected to grow. Unfortunately, many PEV drivers are unable to access charging, in part due to members of the public (not visitors to SCAQMD) leaving their vehicles parked for extended periods of time. Additionally, the current vehicle charging infrastructure consists of multiple EV network providers.

The Board previously released RFP #P2014-24 to expand and upgrade EV charging infrastructure at SCAQMD headquarters. Four areas were identified in SCAQMD's main parking lot to replace existing charging stations and significantly add additional stations. The proposals received for the hardware are shown in Table 1. Staff is recommending an award for the hardware and release of an RFP for the installation of new charging station locations.

## **Outreach**

In accordance with SCAQMD's Procurement Policy and Procedure, a public notice advertising the RFP was published in the Los Angeles Times, the Orange County Register, the San Bernardino Sun, and Riverside County's Press Enterprise newspapers to leverage the most cost-effective method of outreach to the South Coast Basin.

Additionally, potential bidders were notified utilizing SCAQMD's own electronic listing of certified minority vendors. Notice of the RFP was emailed to the Black and Latino Legislative Caucuses and various minority chambers of commerce and business associations, and placed on the Internet at SCAQMD's website (<http://www.aqmd.gov>).

## **Bid Evaluation**

In response to RFP #P2014-24, a total of 14 proposals were received by companies that had participated in the mandatory bidder's conference. The mandatory bidder's conference and site walk held at SCAQMD were attended by 43 participants representing 36 companies.

The proposals were reviewed by a three-member panel in accordance with established SCAQMD guidelines outlined in the RFP. The three-member panel was composed of an SCAQMD Program Supervisor, a Fleet and Transportation Specialist from the County of Los Angeles and one EPRI staff member. The panel was three Caucasian males.

Scores provided by the review panel in Table 1 reflect evaluations for the EV hardware component of the RFP. As specified within the RFP, proposals that receive a technical score of at least 56 out of 70 points were considered technically qualified and eligible for contract awards. Thirteen proposal scores are listed in

Table 1 (scores for one proposal were not included since this company declared bankruptcy in late 2014). Proposals were awarded up to 30 points for cost, which was evaluated by considering hardware costs, five years of ongoing network fees, mandatory five-year warranty, onsite repairs and any other costs associated with operation. Up to 15 additional points were awarded for businesses that provided self-certification verification as defined in the RFP.

**Table 1: EVSE Hardware Proposal Scores**

<b>Proposer</b>	<b>Technical Score</b>	<b>Cost Score</b>	<b>Additional Points</b>	<b>Total Score</b>
Broadband TelCom Power, Inc.	60	30	15	105
Pacific Lighting Management	57	26	15	98
Clean Fuel Connection, Inc./NRG	63	18	15	96
Dalfonso Electric Company	59	21	15	95
On Target Electric, Inc.	56	24	15	95
EVSE LLC	58	24	10	92
Chargepoint	63	21	0	84
EV Connect, Inc.	56	12	15	83
Clean Fuel Connection, Inc./Chargepoint	62	*	15	77
Associated of Los Angeles	58	12	7	77
Telefonix	58	18	0	76
Conti Corporation	48	**	**	**
Bosch Auto. Service Solutions LLC	40	**	**	**

\* Clean Fuel Connection, Inc./Chargepoint proposal did not receive any points for cost as it had the highest cost.

\*\*Conti Corporation and Bosch Automotive Service Solutions LLC proposals were not considered technically qualified so they were not further evaluated.

**Proposal**

This action is to execute a contract with Broadband TelCom Power, Inc. (BTC) to provide EV charging stations and support services at SCAQMD headquarters. This action is to also issue RFP #P2016-01 to solicit bids for contractor services to install EV charging stations for SCAQMD headquarters based on the drawings prepared by Goss Engineering.

Proposed Contract with BTC

Under this contract, BTC will provide up to 110 Level 2 charging stations, replace existing EV charging stations and expand the EV charging infrastructure in two phases. Initially, BTC will replace the existing EV charging stations at SCAQMD headquarters and provide SCAQMD with access control, cost recovery options and demand response capability. In the second phase, BTC will provide additional EV charging stations once the expanded electrical infrastructure is in place. Included in the price for EV charging stations is a five-year warranty with five years of onsite service support, software, power management capabilities, installation support and five years of networking fees. BTC will also be required to help SCAQMD establish desirable power management

schedules to reduce electricity costs and provide technical support with the electrical infrastructure upgrade.

Proposed Contractor Services through RFP Process

RFP #P2016-01 will solicit bids from contractors for the installation of up to 80 Level 2 charging stations and the required electrical infrastructure at SCAQMD Headquarters. The selected contractor shall undertake these tasks while working closely with SCAQMD staff and other designated companies providing hardware or services. The construction documents prepared by Goss Engineering will serve as the blueprint for the installation.

The proposed schedule of events for RFP #P2016-01 to select an electrical contractor is as follows:

Date	Event
September 4, 2015	RFP released
September 29, 2015	Mandatory Bidder’s Conference/Site Walk at 10 am in CC6
November 4, 2015	Proposals Due at 5:00 pm
February 5, 2016	Anticipated Board Approval

Outreach for this RFP will be in accordance with SCAQMD’s practices.

**Benefits to SCAQMD**

This project will provide additional workplace charging to encourage deployment of PEVs, showcase EV charging stations technologies and create a viable workplace charging network that will be accessible, convenient and affordable for PEV drivers working at or visiting SCAQMD headquarters. In addition, SCAQMD will develop a best practices document for EVSE installation, utilization, cost recovery, demand response and energy management from this project. This will encourage more workplace charging while reducing overall electricity costs to support the California PEV market. The scope of this project is identified as a technical priority in the *Technology Advancement Office Clean Fuels Program 2015 Plan Update* under “Electric/Hybrid Technologies and Infrastructure” and “Infrastructure and Deployment.”

**Resource Impacts**

The contract with BTC shall not exceed \$322,425 to provide EV hardware, EV hardware services and replacement of existing EV chargers. The cost of the EV infrastructure installation is unknown at this time, but staff will return to the Board with an award recommendation once RFP #P2016-01 has closed and bids evaluated.



Sufficient funds are available from the Clean Fuels Fund (31), established as a special revenue fund resulting from the state-mandated Clean Fuels Program. The Clean Fuels Program, under Health and Safety Code Sections 40448.5 and 40512 and Vehicle Code Section 9250.11, establishes mechanisms to collect revenues from mobile sources to support projects to increase the utilization of clean fuels, including the development of the necessary advanced enabling technologies. Funds collected from motor vehicles are restricted, by statute, to be used for projects and program activities related to mobile sources that support the objectives of the Clean Fuels Program.

Upon transfer of \$322,425 from the Clean Fuels Fund (31) to the General Fund, sufficient funds will be available in Science and Technology Advancement's FY 2015-16 Budget for the contract with BTC.

**Attachment**

RFP #P2016-01 - Contractor Services to Install the Required Electrical Infrastructure for the Installation of Level 2 Electric Vehicle Charging Stations at SCAQMD Headquarters



# South Coast Air Quality Management District

## SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT REQUEST FOR PROPOSALS

### For Contractor Services to Install the Required Electrical Infrastructure for the Installation of Level 2 Electric Vehicle Charging Stations at SCAQMD Headquarters

#P2016-01

The South Coast Air Quality Management District (SCAQMD) requests proposals for the following purpose according to terms and conditions attached. In the preparation of this Request for Proposals (RFP) the words "Proposer," "Contractor," and "Consultant" are used interchangeably.

#### **PURPOSE**

The purpose of this Request for Proposals (RFP) is to solicit qualified C-10 Electrical Contractors, as defined by California Code of Regulations (Title 16, Division 8, Article 3), to install required electrical infrastructure for installation of up to 110 Level 2 Electric Vehicle Charging Stations to be installed at specific locations throughout SCAQMD headquarters. Contractor shall undertake these tasks while working closely with SCAQMD staff and other designated companies providing hardware or services.

#### **INDEX - The following are contained in this RFP:**

Section I	Background/Information
Section II	Contact Person
Section III	Schedule of Events
Section IV	Participation in the Procurement Process
Section V	Statement of Work/Schedule of Deliverables
Section VI	Required Qualifications
Section VII	Proposal Submittal Requirements
Section VIII	Proposal Submission
Section IX	Proposal Evaluation/Contractor Selection Criteria
Section X	Funding
Section XI	Draft Contract

Attachment A – Certifications and Representations

Attachment B – SCAQMD Headquarters EV Charging Site Plan

Attachment C – Construction Plans and Line Drawing from Engineering Firm

**SECTION I: BACKGROUND/INFORMATION**

The South Coast Air Quality Management District (SCAQMD) is a regional governmental agency responsible for meeting air quality health standards in Orange County and the urban portions of Los Angeles, Riverside and San Bernardino counties. The SCAQMD is requesting bids for a qualified electrical contractor to provide services under two specific tasks:

**Install the required electrical infrastructure and electric vehicle (EV) charging equipment as outlined in the construction plans and line drawings from Engineering Firm (Attachment C), for the installation of up to 110 Level 2 Electric Vehicle Charging Stations to be installed at specific locations throughout SCAQMD headquarters**

Currently, there are 28 Level 2 EV chargers installed at several allocated spaces at SCAQMD’s parking lot for fleet vehicles, visitors and SCAQMD Board members. In recent years the number of plug-in electric vehicles (PEVs) has dramatically increased and the current number of EV chargers is not adequate to meet the PEV charging needs at the facility. As shown in Attachment B, there will be up to 110 Level 2 vehicle chargers installed. Locations and number of vehicle chargers are as follows:

CC8 Parking Lot	up to 10 Level 2 EVSE (30A max)
Front Lobby Parking Lot	up to 13 Level 2 EVSE (30A max)
Upper Level Parking Lot/Solar Carport	up to 19 Level 2 EVSE (30A max)
Upper Level Parking Lot	up to 72 Level 2 EVSE (30A max)

**SECTION II: CONTACT PERSON:**

Questions regarding the content or intent of this RFP or on procedural matters should be addressed to:

**Technical Questions:**

**Patricia Kwon**  
**Air Quality Specialist**  
SCAQMD  
21865 Copley Drive  
Diamond Bar, CA 91765-4178  
(909) 396-3065

**SCAQMD Building Questions:**

**Bruce Jacobson**  
**Building Maintenance Manager**  
SCAQMD  
21865 Copley Drive  
Diamond Bar, CA 91765-4178  
(909) 396-2289

**SECTION III: SCHEDULE OF EVENTS**

September 4, 2015	RFP Released
September 29, 2015	<b>Mandatory Bidders Conference*</b>
November 4, 2015	Proposals Due – <b>No Later Than 5:00 pm</b>
November 5 – 25, 2015	Proposal Evaluation
February 5, 2016	Governing Board Approval
February 26, 2016	Anticipated Contract Execution

\*Participation in the Bidder’s Conference is **Mandatory**. The Bidder’s Conference will be held in Room CC-6 at the SCAQMD Headquarters in Diamond Bar, California at 10:00 am on Tuesday, September 29, 2015. Please contact Patricia Kwon at (909) 396-3065 by close of business on Friday, September 25, 2015 if you plan to attend.

## **SECTION IV: PARTICIPATION IN THE PROCUREMENT PROCESS**

A. It is the policy of the South Coast Air Quality Management District to ensure that all businesses including minority business enterprises, women business enterprises, disabled veteran business enterprises and small businesses have a fair and equitable opportunity to compete for and participate in SCAQMD contracts.

B. Definitions:

The definition of minority, women or disadvantaged business enterprises set forth below is included for purposes of determining compliance with the affirmative steps requirement described in Paragraph G below on procurements funded in whole or in part with federal grant funds which involve the use of subcontractors. The definition provided for disabled veteran business enterprise, local business, small business enterprise, low-emission vehicle business and off-peak hours delivery business are provided for purposes of determining eligibility for point or cost considerations in the evaluation process.

1. "Women business enterprise" (WBE) as used in this policy means a business enterprise that meets all of the following criteria:
  - a. a business that is at least 51 percent owned by one or more women, or in the case of any business whose stock is publicly held, at least 51 percent of the stock is owned by one or more or women.
  - b. a business whose management and daily business operations are controlled by one or more women.
  - c. a business which is a sole proprietorship, corporation, or partnership with its primary headquarters office located in the United States, which is not a branch or subsidiary of a foreign corporation, foreign firm, or other foreign-based business.
2. "Disabled veteran" as used in this policy is a United States military, naval, or air service veteran with at least 10 percent service-connected disability who is a resident of California.
3. "Disabled veteran business enterprise" (DVBE) as used in this policy means a business enterprise that meets all of the following criteria:
  - a. is a sole proprietorship or partnership of which at least 51 percent is owned by one or more disabled veterans or, in the case of a publicly owned business, at least 51 percent of its stock is owned by one or more disabled veterans; a subsidiary which is wholly owned by a parent corporation but only if at least 51 percent of the voting stock of the parent corporation is owned by one or more disabled veterans; or a joint venture in which at least 51 percent of the joint venture's management and control and earnings are held by one or more disabled veterans.
  - b. the management and control of the daily business operations are by one or more disabled veterans. The disabled veterans who exercise management and control are not required to be the same disabled veterans as the owners of the business.

- c. is a sole proprietorship, corporation, or partnership with its primary headquarters office located in the United States, which is not a branch or subsidiary of a foreign corporation, firm, or other foreign-based business.
4. "Local business" as used in this policy means a company that has an ongoing business within geographical boundaries of the SCAQMD at the time of bid or proposal submittal and performs 90% of the work related to the contract within the geographical boundaries of the SCAQMD and satisfies the requirements of subparagraph H below.
5. "Small business" as used in this policy means a business that meets the following criteria:
- a. 1) an independently owned and operated business; 2) not dominant in its field of operation; 3) together with affiliates is either:
- A service, construction, or non-manufacturer with 100 or fewer employees, and average annual gross receipts of ten million dollars (\$10,000,000) or less over the previous three years, or
  - A manufacturer with 100 or fewer employees.
- b. Manufacturer means a business that is both of the following:
- 1) Primarily engaged in the chemical or mechanical transformation of raw materials or processed substances into new products.
- 2) Classified between Codes 311000 and 339000, inclusive, of the North American Industrial Classification System (NAICS) Manual published by the United States Office of Management and Budget, 2007 edition.
6. "Joint ventures" as defined in this policy pertaining to certification means that one party to the joint venture is a DVBE or small business and owns at least 51 percent of the joint venture.
7. "Low-Emission Vehicle Business" as used in this policy means a company or contractor that uses low-emission vehicles in conducting deliveries to the SCAQMD. Low-emission vehicles include vehicles powered by electric, compressed natural gas (CNG), liquefied natural gas (LNG), liquefied petroleum gas (LPG), ethanol, methanol, hydrogen and diesel retrofitted with particulate matter (PM) traps.
8. "Off-Peak Hours Delivery Business" as used in this policy means a company or contractor that commits to conducting deliveries to the SCAQMD during off-peak traffic hours defined as between 10:00 a.m. and 3:00 p.m.
9. "Benefits Incentive Business" as used in this policy means a company or contractor that provides janitorial, security guard or landscaping services to the SCAQMD and commits to providing employee health benefits (as defined below in Section VIII.D.2.d) for full time workers with affordable deductible and co-payment terms.

10. "Minority Business Enterprise" as used in this policy means a business that is at least 51 percent owned by one or more minority person(s), or in the case of any business whose stock is publicly held, at least 51 percent of the stock is owned by one or more or minority persons.

- a. a business whose management and daily business operations are controlled by one or more minority persons.
- b. a business which is a sole proprietorship, corporation, or partnership with its primary headquarters office located in the United States, which is not a branch or subsidiary of a foreign corporation, foreign firm, or other foreign-based business.
- c. "Minority person" for purposes of this policy, means a Black American, Hispanic American, Native-American (including American Indian, Eskimo, Aleut, and Native Hawaiian), Asian-Indian (including a person whose origins are from India, Pakistan, and Bangladesh), Asian-Pacific-American (including a person whose origins are from Japan, China, the Philippines, Vietnam, Korea, Samoa, Guam, the United States Trust Territories of the Pacific, Northern Marianas, Laos, Cambodia, and Taiwan).

11. "Disadvantaged Business Enterprise" as used in this policy means a business that is an entity owned and/or controlled by a socially and economically disadvantaged individual(s) as described by Title X of the Clean Air Act Amendments of 1990 (42 U.S.C. 7601 note) (10% statute), and Public Law 102-389 (42 U.S.C. 4370d)(8% statute), respectively;

a Small Business Enterprise (SBE);

a Small Business in a Rural Area (SBRA);

a Labor Surplus Area Firm (LSAF); or

a Historically Underutilized Business (HUB) Zone Small Business Concern, or a concern under a successor program.

C. Under Request for Quotations (RFQ), DVBEs, DVBE business joint ventures, small businesses, and small business joint ventures shall be granted a preference in an amount equal to 5% of the lowest cost responsive bid. Low-Emission Vehicle Businesses shall be granted a preference in an amount equal to 5 percent of the lowest cost responsive bid. Off-Peak Hours Delivery Businesses shall be granted a preference in an amount equal to 2 percent of the lowest cost responsive bid. Local businesses (if the procurement is not funded in whole or in part by federal grant funds) shall be granted a preference in an amount equal to 2% of the lowest cost responsive bid.

D. Under Request for Proposals, DVBEs, DVBE joint ventures, small businesses, and small business joint ventures shall be awarded ten (10) points in the evaluation process. A non-DVBE or large business shall receive seven (7) points for subcontracting at least twenty-five (25%) of the total contract value to a DVBE and/or small business. Low-Emission Vehicle Businesses shall be awarded five (5) points in the evaluation process. On procurements which are not funded in whole or in part by federal grant funds local businesses shall receive five (5) points. Off-Peak Hours Delivery Businesses shall be awarded two (2) points in the evaluation process.

E. SCAQMD will ensure that discrimination in the award and performance of contracts does not occur on the basis of race, color, sex, national origin, marital status, sexual

preference, creed, ancestry, medical condition, or retaliation for having filed a discrimination complaint in the performance of SCAQMD contractual obligations.

- F. SCAQMD requires Contractor to be in compliance with all state and federal laws and regulations with respect to its employees throughout the term of any awarded contract, including state minimum wage laws and OSHA requirements.
- G. When contracts are funded in whole or in part by federal funds, and if subcontracts are to be let, the Contractor must comply with the following, evidencing a good faith effort to solicit disadvantaged businesses. Contractor shall submit a certification signed by an authorized official affirming its status as a MBE or WBE, as applicable, at the time of contract execution. The SCAQMD reserves the right to request documentation demonstrating compliance with the following good faith efforts prior to contract execution.
  - 1. Ensure Disadvantaged Business Enterprises (DBEs) are made aware of contracting opportunities to the fullest extent practicable through outreach and recruitment activities. For Indian Tribal, State and Local Government recipients, this will include placing DBEs on solicitation lists and soliciting them whenever they are potential sources.
  - 2. Make information on forthcoming opportunities available to DBEs and arrange time frames for contracts and establish delivery schedules, where the requirements permit, in a way that encourages and facilitates participation by DBEs in the competitive process. This includes, whenever possible, posting solicitations for bids or proposals for a minimum of 30 calendar days before the bid or proposal closing date.
  - 3. Consider in the contracting process whether firms competing for large contracts could subcontract with DBEs. For Indian Tribal, State and Local Government recipients, this will include dividing total requirements when economically feasible into smaller tasks or quantities to permit maximum participation by DBEs in the competitive process.
  - 4. Encourage contracting with a consortium of DBEs when a contract is too large for one of these firms to handle individually.
  - 5. Using the services and assistance of the Small Business Administration and the Minority Business Development Agency of the Department of Commerce.
  - 6. If the prime contractor awards subcontracts, require the prime contractor to take the above steps.
- H. To the extent that any conflict exists between this policy and any requirements imposed by federal and state law relating to participation in a contract by a certified MBE/WBE/DVBE as a condition of receipt of federal or state funds, the federal or state requirements shall prevail.
- I. When contracts are not funded in whole or in part by federal grant funds, a local business preference will be awarded. For such contracts that involve the purchase of commercial off-the-shelf products, local business preference will be given to suppliers or distributors of commercial off-the-shelf products who maintain an ongoing business within the

geographical boundaries of the SCAQMD. However, if the subject matter of the RFP or RFQ calls for the fabrication or manufacture of custom products, only companies performing 90% of the manufacturing or fabrication effort within the geographical boundaries of the SCAQMD shall be entitled to the local business preference.

- J. In compliance with federal fair share requirements set forth in 40 CFR Part 33, the SCAQMD shall establish a fair share goal annually for expenditures with federal funds covered by its procurement policy.

**SECTION V: STATEMENT OF WORK/SCHEDULE OF DELIVERABLES**

Proposals for this project shall address concisely the information provided in the following scope of work and in the format specified in Section VII Proposal Submittal Requirements. Proposers are encouraged to pay close attention to Section IX Proposal Evaluation/Contractor Selection Criteria to assess how their bids will be evaluated. Each bid will be evaluated independently and multiple awards may be made under this RFP. Information provided should be specific for evaluation, scoring purposes, and for inclusion into a binding contract. Proposals shall expand and provide more complete details based on the requirements and available options in the Statement of Work outlined below. Please refer to Attachment B for SCAQMD’s building parking lot map for the areas where new EVSE will be expanded and upgraded.

The SCAQMD is requesting bids for qualified C-10 Electrical Contractors, as defined by California Code of Regulations (Title 16, Division 8,Article 3), to provide services under the following task:

Contractor shall install the required electrical and associated infrastructure, as outlined in the construction plans and documents provided by the Engineering Firm (Attachment C), for the installation of up to 110 Level 2 EV Charging Stations to be installed at specific locations throughout SCAQMD headquarters. Locations and number of vehicle chargers are as follows (refer to Attachment B for map of areas):

CC8 Parking Lot	up to 10 Level 2 EVSE (30A max)
Front Lobby Parking Lot	up to 13 Level 2 EVSE (30A max)
Upper Level Parking Lot/Solar Carport	up to 19 Level 2 EVSE (30A max)
Upper Level Parking Lot	up to 72 Level 2 EVSE (30A max)

Contractor shall install EV chargers and work with the EVSE provider to ensure proper operation and compliance with all applicable codes and regulations such as, City of Diamond Bar permitting requirements, EV regulations, and all pertinent building codes.

Installation of EVSE shall comply with universal charging access guidelines in *PEVs: Universal Charging Access Guidelines and Best Practices* published by the State of California Governor’s Office of Planning and Research (OPR) and the Division of the State Architect [http://opr.ca.gov/docs/PEV\\_Access\\_Guidelines.pdf](http://opr.ca.gov/docs/PEV_Access_Guidelines.pdf)



Installation of EVSE will comply with ZEV *Community Readiness Guidebook* published by OPR pertaining to best practices for installation of EVSE  
[http://opr.ca.gov/docs/ZEV\\_Guidebook.pdf](http://opr.ca.gov/docs/ZEV_Guidebook.pdf)

Contractor shall obtain all permits required for installation of Level 2 chargers.

Contractor shall be required to do all site preparation work, including but not limited to trenching, boring, conduit runs, concrete cutting, asphalt removal/pour, removal of existing EV chargers, relocation of EV chargers, installation of conduit and electrical wire, upgrade of existing electrical infrastructure including panel additions and transformers, installation of owner-furnished contractor-installed (OFCI) Level 2 EV chargers, as well as repair and replacement of all hardscape and landscape demolished and/or removed during site preparation. All work related to site preparation and repair/replacement work must be pre-approved by SCAQMD.

Contractor shall ensure that the provisions for all safety codes meet or exceed industry standards and will be compliant with all applicable building and electrical codes.

Contractor shall understand and follow installation and accessibility guidelines within the American Disabilities Act.

Contractor shall meet all applicable SB 854 PW-100 requirements for Public Works projects.

Contractor shall comply with all Prevailing Wage requirements.

Contractor shall install necessary signage, wheel stops, and other requirements to ensure compliance with all applicable rules and regulations. All signage and wheel stops must be pre-approved by SCAQMD.

Electrical installation shall be completed to ensure proper function, minimizing the risk of damage from vehicles and installed in an aesthetically pleasing fashion that blends with the existing building architecture. Contractor shall work with the hardware provider to ensure proper positioning and operation once the EV chargers have been installed.

Contractor shall provide a Phasing Plan outlining the specific tasks along with anticipated milestone completion dates. Contractor shall hold routine meetings with SCAQMD to provide progress updates in conjunction with the construction schedule.

## **SECTION VI: REQUIRED QUALIFICATIONS**

A. Contractors or firms proposing to submit a bid on this project shall be qualified and experienced in evaluating existing electrical infrastructure to determine appropriate wiring, transformers, conduit, and any other hardware deemed necessary for installation of EV chargers.

B. Proposer must submit the following:

1. Resumes showing the qualifications of the electrical contractors, engineers, and other technical person or persons working on this project;

2. List of references for work conducted on similar projects as defined in the Statement of Work.
3. Summary of proposer's general qualifications and experience to meet required qualifications and fulfill Statement of Work.

### **Contract Bonds**

Before execution of the Contract, the Contractor shall file surety bonds in the amounts and for the purpose specified in the RFP. Bonds shall be issued by a surety who is listed in the latest version of U.S. Department of Treasury Circular 570, who is authorized to issue bonds in California, and whose bonding limitations shown in said circular is sufficient to provide bonds in the amount required by the Contract shall be approved by SCAQMD. Bonds from all other sureties shall be accompanied by all of the documents enumerated in the Code of Civil Procedure, Section 995.660a).

Each bond shall be incorporated, by reference, the Contract and shall be signed by both the Bidder and Surety. The signature of the authorized agent of the Surety shall be notarized. The Contractor shall provide two good and sufficient surety bonds

### **Payment Bond**

The Payment Bond (material and labor bond) shall not be for less than 100 percent of the Contract price, to satisfy claims of material suppliers and mechanics and laborers employed on the Project. The Bond shall be maintained by the Contractor in full force and effect until the performance of the Contract is accepted by SCAQMD and until all claims for materials and labor are paid, and otherwise comply with the Civil Code. Contractor shall provide SCAQMD with Conditional Lien Releases with each payment request and Unconditional Lien Releases for the final payment for all material suppliers, mechanics and laborers employed on the Project.

### **Performance Bond**

The Performance Bond shall be for 100 percent of the Contract Price to guarantee faithful performance of all work, within the time prescribed, in a manner satisfactory to SCAQMD, and that all materials and workmanship will be free from original or developed defects. The bond must remain in effect until the end of all warranty periods as set forth in the Contract Documents.

The Contractor shall pay all bond premiums, costs and incidentals. Should any bond be insufficient, the Contractor shall renew the bond within 10 Days after receiving notice from SCAQMD. Should any Surety at any time be unsatisfactory to SCAQMD, notice to the effect will be given to the Contractor. No further payments shall be deemed due or will be made under the Contract until a new Surety qualifies and is accepted by SCAQMD.

Changes in the Project or extension of time, made pursuant to the Contract, shall in no way release the Contractor or Surety from the obligation. Notice of such changes or extensions shall be waived by the Surety.

## **SECTION VII: PROPOSAL SUBMITTAL REQUIREMENTS**

Submitted proposals must follow the format outlined below and all requested information must be supplied. Failure to submit proposals in the required format will result in elimination from proposal evaluation.

### **Each proposal must be submitted in three separate volumes:**

- Volume I - Technical Proposal
- Volume II - Cost Proposal
- Volume III - Certifications and Representations included in Attachment A to this RFP, should be executed by an authorized official of the Contractor.

A separate cover letter including the name, address, and telephone number of the contractor, and signed by the person or persons authorized to represent the firm should accompany the proposal submission. Firm contact information as follows should also be included in the cover letter:

1. Address and telephone number of office in, or nearest to, Diamond Bar, California.
2. Name and title of firm's representative designated as contact.

A separate Table of Contents should be provided for Volumes I and II.

### **VOLUME I - TECHNICAL PROPOSAL**

#### **DO NOT INCLUDE ANY COST INFORMATION IN THE TECHNICAL VOLUME**

Summary (Section A) - State overall approach to meeting the objectives and satisfying the scope of work to be performed, the sequence of activities, and a description of methodology or techniques to be used.

Program Schedule (Section B) - Provide projected milestones or benchmarks for submitting reports within the total time allowed.

Project Organization (Section C) - Describe the proposed management structure, program monitoring procedures, and organization of the proposed team.

Qualifications (Section D) - Describe the technical capabilities of the firm. Provide references of other similar studies performed during the last five years demonstrating ability to successfully complete the project. Include contact name, title, and telephone number for any references listed. Provide a statement of your firm's background and experience in performing similar projects for other governmental organizations.

Assigned Personnel (Section E) - Provide the following information on the staff to be assigned to this project:

1. List all key personnel assigned to the project by title and name. Provide a resume or similar statement of the qualifications of the lead person and all persons assigned to the project. Substitution of project manager or lead personnel will not be permitted without prior written approval of SCAQMD.

2. Provide a spreadsheet of the labor hours proposed for each labor category at the task level.
3. Provide a statement indicating whether or not 90% of the work will be performed within the geographical boundaries of the SCAQMD.
4. Provide a statement of the education and training program provided by, or required of, the staff identified for participation in the project, particularly with reference to management consulting, governmental practices and procedures, and technical matters.
5. Provide a summary of your firm's general qualifications to meet required qualifications and fulfill statement of work, including additional firm personnel and resources beyond those who may be assigned to the project.

Subcontractors (Section F) - This project may require expertise in multiple technical areas. List any subcontractors that may be used and the work to be performed by them.

Conflict of Interest (Section G) - Address possible conflicts of interest with other clients affected by actions performed by the firm on behalf of SCAQMD. Although the Proposer will not be automatically disqualified by reason of work performed for such firms, SCAQMD reserves the right to consider the nature and extent of such work in evaluating the proposal.

Additional Data (Section H) - Provide other essential data that may assist in the evaluation of this proposal.

## **VOLUME II - COST PROPOSAL**

Name and Address - The Cost Proposal must list the name and complete address of the Proposer in the upper left-hand corner.

Cost Proposal – SCAQMD anticipates awarding a fixed price contract. Cost information must be provided as listed below:

1. Detail must be provided by the following categories:
  - A. Labor - List the total number of hours and the hourly billing rate for each level of professional staff. A breakdown of the proposed billing rates must identify the direct labor rate, overhead rate and amount, fringe benefit rate and amount, General and Administrative rate and amount, and proposed profit or fee. Provide a basis of estimate justifying the proposed labor hours and proposed labor mix.
  - B. Subcontractor Costs - List subcontractor costs and identify subcontractors by name. Itemize subcontractor charges per hour or per day.
  - C. Travel Costs - Indicate amount of travel cost and basis of estimate to include trip destination, purpose of trip, length of trip, airline fare or mileage expense, per diem costs, lodging and car rental.
  - D. Other Direct Costs -This category may include such items as postage and mailing expense, printing and reproduction costs, etc. Provide a basis of estimate for these costs.

**VOLUME III - CERTIFICATIONS AND REPRESENTATIONS** (See Attachment A)

**SECTION VIII: PROPOSAL SUBMISSION**

All proposals must be submitted according to specifications set forth in the section above. Failure to adhere to these specifications may be cause for rejection of proposal.

Signature - All proposals should be signed by an authorized representative of the Proposer.

Due Date - The Proposer shall submit six (6) complete hard copies and one electronic copy on CD or flash drive of the proposal in a sealed envelope, plainly marked in the upper left-hand corner with the name and address of the Proposer and the words "Request for Proposals #2016-01." **All proposals are due no later than 5:00 p.m., November 4, 2015, and should be directed to:**

Procurement Unit  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765-4178  
(909) 396-3520

**Late bids/proposals will not be accepted under any circumstances.**

Grounds for Rejection - A proposal may be immediately rejected if:

- It is not prepared in the format described, or
- It is signed by an individual not authorized to represent the firm.

Modification or Withdrawal - Once submitted, proposals cannot be altered without the prior written consent of SCAQMD. All proposals shall constitute firm offers and may not be withdrawn for a period of ninety (90) days following the last day to accept proposals.

**SECTION IX: PROPOSAL EVALUATION/CONTRACTOR SELECTION CRITERIA**

- A. Proposals will be evaluated by a panel of three to five SCAQMD staff members familiar with the subject matter of the project. The panel shall be appointed by the Executive Officer or his designee. In addition, the evaluation panel may include such outside public sector or academic community expertise as deemed desirable by the Executive Officer. The panel will make a recommendation to the Executive Officer and/or the Governing Board of the SCAQMD for final selection of a contractor and negotiation of a contract.
- B. Each member of the evaluation panel shall be accorded equal weight in his or her rating of proposals. The evaluation panel members shall evaluate the proposals according to the specified criteria and numerical weightings set forth below.

1. Proposal Evaluation Criteria

R&D Projects Requiring Technical or Scientific Expertise,  
or Special Projects Requiring Unique Knowledge or Abilities

Understanding the Problem	20
Technical/Management Approach	20

Contractor Qualifications	20
Previous Experience on Similar Projects	10
Cost	<u>30</u>
TOTAL	100

Additional Points

Small Business or Small Business Joint Venture	10
DVBE or DVBE Joint Venture	10
Use of DVBE or Small Business Subcontractors	7
Low-Emission Vehicle Business	5
Local Business (Non-Federally Funded Projects Only)	5
Off-Peak Hours Delivery Business	2

**The cumulative points awarded for small business, DVBE, use of small business or DVBE subcontractors, low-emission vehicle business, local business, and off-peak hours delivery business shall not exceed 15 points.**

Self-Certification for Additional Points

**The award of these additional points shall be contingent upon Proposer completing the Self-Certification section of Attachment A – Certifications and Representations and/or inclusion of a statement in the proposal self-certifying that Proposer qualifies for additional points as detailed above.**

2. To receive additional points in the evaluation process for the categories of Small Business or Small Business Joint Venture, DVBE or DVBE Joint Venture or Local Business (for non-federally funded projects), the proposer must submit a self-certification or certification from the State of California Office of Small Business Certification and Resources at the time of proposal submission certifying that the proposer meets the requirements set forth in Section III. To receive points for the use of DVBE and/or Small Business subcontractors, at least 25 percent of the total contract value must be subcontracted to DVBEs and/or Small Businesses. To receive points as a Low-Emission Vehicle Business, the proposer must demonstrate to the Executive Officer, or designee, that supplies and materials delivered to the SCAQMD are delivered in vehicles that operate on either clean-fuels or if powered by diesel fuel, that the vehicles have particulate traps installed. To receive points as an Off-Peak Hours Delivery Business, the proposer must submit, at proposal submission, certification of its commitment to delivering supplies and materials to SCAQMD between the hours of 10:00 a.m. and 3:00 p.m. The cumulative points awarded for small business, DVBE, use of Small Business or DVBE Subcontractors, Local Business, Low-Emission Vehicle Business and Off-Peak Hour Delivery Business shall not exceed 15 points.

The Procurement Section will be responsible for monitoring compliance of suppliers awarded purchase orders based upon use of low-emission vehicles or off-peak traffic hour delivery commitments through the use of vendor logs which will identify the contractor awarded the incentive. The purchase order shall incorporate terms which obligate the supplier to deliver materials in low-emission vehicles or deliver during off-peak traffic hours. The Receiving department will monitor those qualified supplier deliveries to ensure compliance to the purchase order requirements. Suppliers in non-compliance will be subject to a two percent of total purchase order value penalty. The Procurement Manager will adjudicate any disputes regarding either low-emission vehicle or off-peak hour deliveries.

3. For procurement of Research and Development (R & D) projects or projects requiring technical or scientific expertise or special projects requiring unique knowledge and abilities, technical factors including past experience shall be weighted at 70 points and cost shall be weighted at 30 points. A proposal must receive at least 56 out of 70 points on R & D projects and projects requiring technical or scientific expertise or special projects requiring unique knowledge and abilities, in order to be deemed qualified for award.
  4. The lowest cost proposal will be awarded the maximum cost points available and all other cost proposals will receive points on a prorated basis. For example if the lowest cost proposal is \$1,000 and the maximum points available are 30 points, this proposal would receive the full 30 points. If the next lowest cost proposal is \$1,100 it would receive 27 points reflecting the fact that it is 10% higher than the lowest cost (90% of 30 points = 27 points).
- C. During the selection process the evaluation panel may wish to interview some proposers for clarification purposes only. No new material will be permitted at this time. Additional information provided during the bid review process is limited to clarification by the Proposer of information presented in his/her proposal, upon request by SCAQMD.
  - D. The Executive Officer or Governing Board may award the contract to a Proposer other than the Proposer receiving the highest rating in the event the Governing Board determines that another Proposer from among those technically qualified would provide the best value to SCAQMD considering cost and technical factors. The determination shall be based solely on the Evaluation Criteria contained in the Request for Proposal (RFP), on evidence provided in the proposal and on any other evidence provided during the bid review process.
  - E. Selection will be made based on the above-described criteria and rating factors. The selection will be made by and is subject to Executive Officer or Governing Board approval. Proposers may be notified of the results by letter.
  - F. The Governing Board has approved a Bid Protest Procedure which provides a process for a bidder or prospective bidder to submit a written protest to the SCAQMD Procurement Manager in recognition of two types of protests: Protest Regarding Solicitation and Protest Regarding Award of a Contract. Copies of the Bid Protest Policy can be secured through a request to the SCAQMD Procurement Department.

- G. The Executive Officer or Governing Board may award contracts to more than one proposer if in (his or their) sole judgment the purposes of the (contract or award) would best be served by selecting multiple proposers.
- H. If additional funds become available, the Executive Officer or Governing Board may increase the amount awarded. The Executive Officer or Governing Board may also select additional proposers for a grant or contract if additional funds become available.
- I. Disposition of Proposals – Pursuant to the District’s Procurement Policy and Procedure, SCAQMD reserves the right to reject any or all proposals. All proposals become the property of SCAQMD, and are subject to the California Public Records Act. One copy of the proposal shall be retained for SCAQMD files. Additional copies and materials will be returned only if requested and at the proposer's expense.
- J. **If proposal submittal is for a Public Works project as defined by State of California Labor Code Section 1720, Proposer is required to include Contractor Registration No. in Attachment A. Proposal submittal will be deemed as non-responsive and bidder may be disqualified if Contractor Registration No. is not included in Attachment A. Proposer is alerted to changes to California Prevailing Wage compliance requirements as defined in Senate Bill 854 (Stat. 2014, Chapter 28), and California Labor Code Sections 1770, 1771 and 1725.**

**SECTION X: FUNDING**

The total funding for the work contemplated by this RFP will be finalized based on the proposals received for the project.



**SECTION XI: DRAFT CONTRACT (Provided as a sample only)**



**South Coast  
Air Quality Management District**

This Contract consists of \*\*\* pages.

1. PARTIES - The parties to this Contract are the South Coast Air Quality Management District (referred to here as "SCAQMD") whose address is 21865 Copley Drive, Diamond Bar, California 91765-4178, and \*\*\* (referred to here as "CONTRACTOR") whose address is \*\*\*.
2. RECITALS
  - A. SCAQMD is the local agency with primary responsibility for regulating stationary source air pollution within the geographical boundaries of the South Coast Air Quality Management District in the State of California. SCAQMD desires to contract with CONTRACTOR for services described in Attachment 1 - Statement of Work, attached here and made a part here by this reference. CONTRACTOR warrants that it is well-qualified and has the experience to provide such services on the terms set forth here.
  - B. CONTRACTOR is authorized to do business in the State of California and attests that it is in good tax standing with the California Franchise Tax Board.
  - C. All parties to this Contract have had the opportunity to have this Contract reviewed by their attorney.
3. PERFORMANCE REQUIREMENTS
  - A. CONTRACTOR agrees to obtain and maintain the required licenses, permits, and all other appropriate legal authorizations from all applicable federal, state and local jurisdictions and pay all applicable fees. CONTRACTOR further agrees to immediately notify SCAQMD in writing of any change in its licensing status which has a material impact on the CONTRACTOR's performance under this Contract.
  - B. CONTRACTOR shall submit reports to SCAQMD as outlined in Attachment 1 - Statement of Work. All reports shall be submitted in an environmentally friendly format: recycled paper; stapled, not bound; black and white, double-sided print; and no three-ring, spiral, or plastic binders or cardstock covers. SCAQMD reserves the right to review, comment, and request changes to any report produced as a result of this Contract.
  - C. CONTRACTOR shall perform all tasks set forth in Attachment 1 - Statement of Work, and shall not engage, during the term of this Contract, in any performance of work that is in direct or indirect conflict with duties and responsibilities set forth in Attachment 1 - Statement of Work.
  - D. CONTRACTOR shall be responsible for exercising the degree of skill and care customarily required by accepted professional practices and procedures subject to SCAQMD's final approval which SCAQMD will not unreasonably withhold. Any costs incurred due to the failure to meet the foregoing standards, or otherwise defective services which require re-performance, as directed by SCAQMD, shall be the responsibility of CONTRACTOR. CONTRACTOR's failure to achieve the performance goals and objectives stated in Attachment 1- Statement of Work, is not a basis for requesting re-performance unless work conducted by CONTRACTOR is deemed by SCAQMD to have failed the foregoing standards of performance.
  - E. CONTRACTOR shall post a performance bond in the amount of \*\*\* Dollars (\$\*\*\*) from a surety authorized to issue such bonds within the State. [OPTIONAL]
  - F. SCAQMD has the right to review the terms and conditions of the performance bond and to request modifications thereto which will ensure that SCAQMD will be compensated in the event CONTRACTOR fails to perform and also provides SCAQMD with the opportunity to review the qualifications of the entity

designated by the issuer of the performance bond to perform in CONTRACTOR's absence and, if necessary, the right to reject such entity. [OPTIONAL]

G. CONTRACTOR shall require its subcontractors to abide by the requirements set forth in this Contract.

4. TERM - The term of this Contract is from the date of execution by both parties (or insert date) to \*\*\*, unless further extended by amendment of this Contract in writing. No work shall commence until this Contract is fully executed by all parties. [Remove this last sentence if Pre-Contract Clause is used]

5. TERMINATION

A. In the event any party fails to comply with any term or condition of this Contract, or fails to provide services in the manner agreed upon by the parties, including, but not limited to, the requirements of Attachment 1 – Statement of Work, this failure shall constitute a breach of this Contract. The non-breaching party shall notify the breaching party that it must cure this breach or provide written notification of its intention to terminate this contract. Notification shall be provided in the manner set forth in Clause 12. The non-breaching party reserves all rights under law and equity to enforce this contract and recover damages.

B. SCAQMD reserves the right to terminate this Contract, in whole or in part, without cause, upon thirty (30) days' written notice. Once such notice has been given, CONTRACTOR shall, except as and to the extent or directed otherwise by SCAQMD, discontinue any Work being performed under this Contract and cancel any of CONTRACTOR's orders for materials, facilities, and supplies in connection with such Work, and shall use its best efforts to procure termination of existing subcontracts upon terms satisfactory to SCAQMD. Thereafter, CONTRACTOR shall perform only such services as may be necessary to preserve and protect any Work already in progress and to dispose of any property as requested by SCAQMD.

C. CONTRACTOR shall be paid in accordance with this Contract for all Work performed before the effective date of termination under Clause 5.B. Before expiration of the thirty (30) days' written notice, CONTRACTOR shall promptly deliver to SCAQMD all copies of documents and other information and data prepared or developed by CONTRACTOR under this Contract with the exception of a record copy of such materials, which may be retained by CONTRACTOR.

6. STOP WORK – SCAQMD may, at any time, by written notice to CONTRACTOR, require CONTRACTOR to stop all or any part of the work tasks in this Contract. A stop work order may be issued for reasons including, but not limited to, the project exceeding the budget, out of scope work, delay in project schedule, or misrepresentations. Upon receipt of the stop work order, CONTRACTOR shall immediately take all necessary steps to comply with the order. CONTRACTOR shall resume the work only upon receipt of written instructions from SCAQMD cancelling the stop work order. CONTRACTOR agrees and understands that CONTRACTOR will not be paid for performing work while the stop work order is in effect, unless SCAQMD agrees to do so in its written cancellation of the stop work order.

7. INSURANCE

A. CONTRACTOR shall furnish evidence to SCAQMD of workers' compensation insurance for each of its employees, in accordance with either California or other states' applicable statutory requirements prior to commencement of any work on this Contract.

B. CONTRACTOR shall furnish evidence to SCAQMD of general liability insurance with a limit of at least \$1,000,000 per occurrence, and \$2,000,000 in a general aggregate prior to commencement of any work on this Contract. SCAQMD shall be named as an additional insured on any such liability policy, and thirty (30) days written notice prior to cancellation of any such insurance shall be given by CONTRACTOR to SCAQMD.

- C. CONTRACTOR shall furnish evidence to SCAQMD of automobile liability insurance with limits of at least \$100,000 per person and \$300,000 per accident for bodily injuries, and \$50,000 in property damage, or \$1,000,000 combined single limit for bodily injury or property damage, prior to commencement of any work on this Contract. SCAQMD shall be named as an additional insured on any such liability policy, and thirty (30) days written notice prior to cancellation of any such insurance shall be given by CONTRACTOR to SCAQMD.
  - D. CONTRACTOR shall furnish evidence to SCAQMD of Professional Liability Insurance with an aggregate limit of not less than \$5,000,000. [OPTIONAL]
  - E. If CONTRACTOR fails to maintain the required insurance coverage set forth above, SCAQMD reserves the right either to purchase such additional insurance and to deduct the cost thereof from any payments owed to CONTRACTOR or terminate this Contract for breach.
  - F. All insurance certificates should be mailed to: SCAQMD Risk Management, 21865 Copley Drive, Diamond Bar, CA 91765-4178. **The SCAQMD Contract Number must be included on the face of the certificate.**
  - G. CONTRACTOR must provide updates on the insurance coverage throughout the term of the Contract to ensure that there is no break in coverage during the period of contract performance. Failure to provide evidence of current coverage shall be grounds for termination for breach of Contract.
8. INDEMNIFICATION - CONTRACTOR agrees to hold harmless, defend and indemnify SCAQMD, its officers, employees, agents, representatives, and successors-in-interest against any and all loss, damage, costs, lawsuits, claims, demands, causes of action judgments, attorney's fees, or any other expenses arising from or related to any third party claim against SCAQMD, its officers, employees, agents, representatives, or successors in interest that arise or result in whole or in part, from any actual or alleged act or omission of CONTRACTOR, its employees, subcontractors, agents or representatives in the performance of this Contract. This Indemnification Clause shall survive the expiration or termination (for any reason) of the Contract and shall remain in full force and effect.
9. RECORDS RETENTION, ON-SITE INSPECTIONS AND AUDIT
- A. CONTRACTOR agrees to the following Records Retention Period: maintain records related to this Contract during the Contract term and continue to retain these records for a period of three years beyond the Contract term.
  - B. SCAQMD, or its designee(s), shall have the right to conduct on-site inspections of the project and to audit records related to this Contract during the Records Retention Period. CONTRACTOR agrees to include a similar right for SCAQMD to conduct on-site inspections and audits in any related subcontract.
  - C. If an amount is found to be inappropriately expended, SCAQMD may withhold payment, or seek reimbursement, from CONTRACTOR in the amount equal to the amount which was inappropriately expended. Such withholding or reimbursement shall not be construed as SCAQMD's sole remedy and shall not relieve CONTRACTOR of its obligation to perform under the terms of this Contract.
10. CO-FUNDING [USE IF REQUIRED]
- A. CONTRACTOR shall obtain co-funding as follows: \*\*\*, \*\*\*, Dollars (\$\*\*\*); \*\*\*, \*\*\*, Dollars (\$\*\*\*); \*\*\*, \*\*\*, Dollars (\$\*\*\*); \*\*\*, \*\*\*, Dollars (\$\*\*\*); \*\*\*, \*\*\*, Dollars (\$\*\*\*); and \*\*\*, \*\*\*, Dollars (\$\*\*\*).
  - B. If CONTRACTOR fails to obtain co-funding in the amount(s) referenced above, then SCAQMD reserves the right to renegotiate or terminate this Contract.
  - C. CONTRACTOR shall provide co-funding in the amount of \*\*\*, Dollars (\$\*\*\*) for this project. If CONTRACTOR fails to provide this co-funding, then SCAQMD reserves the right to renegotiate or terminate this Contract.

## 11. PAYMENT

### [FIXED PRICE]

- A. SCAQMD shall pay CONTRACTOR a fixed price of \*\*\* Dollars (\$\*\*\*) for work performed under this Contract in accordance with Attachment 2 - Payment Schedule, attached here and included here by reference. Payment shall be made by SCAQMD to CONTRACTOR within thirty (30) days after approval by SCAQMD of an invoice prepared and furnished by CONTRACTOR showing services performed and referencing tasks and deliverables as shown in Attachment 1 - Statement of Work, and the amount of charge claimed. Each invoice must be prepared in duplicate, on company letterhead, and list SCAQMD's Contract number, period covered by invoice, and CONTRACTOR's social security number or Employer Identification Number and submitted to: South Coast Air Quality Management District, Attn: \*\*\*.
- B. An amount equal to ten percent (10%) shall be withheld from all charges paid until satisfactory completion and final acceptance of work by SCAQMD. [OPTIONAL]
- C. SCAQMD reserves the right to disallow charges when the invoiced services are not performed satisfactorily in SCAQMD's sole judgment.

### [T & M]

- A. SCAQMD shall pay CONTRACTOR a total not to exceed amount of \*\*\* Dollars (\$\*\*\*), including any authorized travel-related expenses, for time and materials at rates in accordance with Attachment 2 – Cost Schedule, attached here and included here by this reference. Payment of charges shall be made by SCAQMD to CONTRACTOR within thirty (30) days after approval by SCAQMD of an itemized invoice prepared and furnished by CONTRACTOR referencing line item expenditures as listed in Attachment 2 and the amount of charge claimed. Each invoice must be prepared in duplicate, on company letterhead, and list SCAQMD's Contract number, period covered by invoice, and CONTRACTOR's social security number or Employer Identification Number and submitted to: South Coast Air Quality Management District, Attn: \*\*\*.
- B. CONTRACTOR shall adhere to total tasks and/or cost elements (cost category) expenditures as listed in Attachment 2. Reallocation of costs between tasks and/or cost category expenditures is permitted up to One Thousand Dollars (\$1,000) upon prior written approval from SCAQMD. Reallocation of costs in excess of One Thousand Dollars (\$1,000) between tasks and/or cost category expenditures requires an amendment to this Contract.
- C. SCAQMD's payment of invoices shall be subject to the following limitations and requirements:
  - i) Charges for equipment, material, and supply costs, travel expenses, subcontractors, and other charges, as applicable, must be itemized by CONTRACTOR. Reimbursement for equipment, material, supplies, subcontractors, and other charges shall be made at actual cost. Supporting documentation must be provided for all individual charges (with the exception of direct labor charges provided by CONTRACTOR). SCAQMD's reimbursement of travel expenses and requirements for supporting documentation are listed below.
  - ii) CONTRACTOR's failure to provide receipts shall be grounds for SCAQMD's non-reimbursement of such charges. SCAQMD may reduce payments on invoices by those charges for which receipts were not provided.
  - iii) SCAQMD shall not pay interest, fees, handling charges, or cost of money on Contract.
- D. SCAQMD shall reimburse CONTRACTOR for travel-related expenses only if such travel is expressly set forth in Attachment 2 – Cost Schedule of this Contract or pre-authorized by SCAQMD in writing.
  - i) SCAQMD's reimbursement of travel-related expenses shall cover lodging, meals, other incidental expenses, and costs of transportation subject to the following limitations:
    - Air Transportation - Coach class rate for all flights. If coach is not available, business class rate is permissible.
    - Car Rental - A compact car rental. A mid-size car rental is permissible if car rental is shared by three or more individuals.

Lodging - Up to One Hundred Fifty Dollars (\$150) per night. A higher amount of reimbursement is permissible if pre-approved by SCAQMD.

Meals - Daily allowance is Fifty Dollars (\$50.00).

ii) Supporting documentation shall be provided for travel-related expenses in accordance with the following requirements:

Lodging, Airfare, Car Rentals - Bill(s) for actual expenses incurred.

Meals - Meals billed in excess of \$50.00 each day require receipts or other supporting documentation for the total amount of the bill and must be approved by SCAQMD.

Mileage - Beginning each January 1, the rate shall be adjusted effective February 1 by the Chief Financial Officer based on the Internal Revenue Service Standard Mileage Rate.

Other travel-related expenses - Receipts are required for all individual items.

E. SCAQMD reserves the right to disallow charges when the invoiced services are not performed satisfactorily in SCAQMD's sole judgment.

12. INTELLECTUAL PROPERTY RIGHTS - Title and full ownership rights to any software, documents, or reports developed under this Contract shall at all times remain with SCAQMD. Such material is agreed to be SCAQMD proprietary information.

A. Rights of Technical Data - SCAQMD shall have the unlimited right to use technical data, including material designated as a trade secret, resulting from the performance of services by CONTRACTOR under this Contract. CONTRACTOR shall have the right to use technical data for its own benefit.

B. Copyright - CONTRACTOR agrees to grant SCAQMD a royalty-free, nonexclusive, irrevocable license to produce, translate, publish, use, and dispose of all copyrightable material first produced or composed in the performance of this Contract.

13. NOTICES - Any notices from either party to the other shall be given in writing to the attention of the persons listed below, or to other such addresses or addressees as may hereafter be designated in writing for notices by either party to the other. Notice shall be given by certified, express, or registered mail, return receipt requested, and shall be effective as of the date of receipt indicated on the return receipt card.

SCAQMD: South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765-4178  
Attn: \*\*\*

CONTRACTOR: \*\*\*  
\*\*\*  
\*\*\*  
Attn: \*\*\*

14. INDEPENDENT CONTRACTOR - CONTRACTOR is an independent contractor. CONTRACTOR, its officers, employees, agents, representatives, or subcontractors shall in no sense be considered employees or agents of SCAQMD, nor shall CONTRACTOR, its officers, employees, agents, representatives, or subcontractors be entitled to or eligible to participate in any benefits, privileges, or plans, given or extended by SCAQMD to its employees. SCAQMD will not supervise, direct, or have control over, or be responsible for, CONTRACTOR's or subcontractor's means, methods, techniques, work sequences or procedures or for the safety precautions and programs incident thereto, or for any failure by them to comply with any local, state, or federal laws, or rules or regulations, including state minimum wage laws and OSHA requirements.

CONTRACTOR shall promptly notify SCAQMD of any material changes to subcontracts that affect the Contract's scope of work, deliverable schedule, and/or payment/cost schedule.

15. CONFIDENTIALITY - It is expressly understood and agreed that SCAQMD may designate in a conspicuous manner the information which CONTRACTOR obtains from SCAQMD as confidential. CONTRACTOR agrees to:

- A. Observe complete confidentiality with respect to such information, including without limitation, agreeing not to disclose or otherwise permit access to such information by any other person or entity in any manner whatsoever, except that such disclosure or access shall be permitted to employees or subcontractors of CONTRACTOR requiring access in fulfillment of the services provided under this Contract.
- B. Ensure that CONTRACTOR's officers, employees, agents, representatives, and independent contractors are informed of the confidential nature of such information and to assure by agreement or otherwise that they are prohibited from copying or revealing, for any purpose whatsoever, the contents of such information or any part thereof, or from taking any action otherwise prohibited under this clause.
- C. Not use such information or any part thereof in the performance of services to others or for the benefit of others in any form whatsoever whether gratuitously or for valuable consideration, except as permitted under this Contract.
- D. Notify SCAQMD promptly and in writing of the circumstances surrounding any possession, use, or knowledge of such information or any part thereof by any person or entity other than those authorized by this clause.
- E. Take at CONTRACTOR expense, but at SCAQMD's option and in any event under SCAQMD's control, any legal action necessary to prevent unauthorized use of such information by any third party or entity which has gained access to such information at least in part due to the fault of CONTRACTOR.
- F. Take any and all other actions necessary or desirable to assure such continued confidentiality and protection of such information.
- G. Prevent access to such information by any person or entity not authorized under this Contract.
- H. Establish specific procedures in order to fulfill the obligations of this clause.
- I. Notwithstanding the above, nothing herein is intended to abrogate or modify the provisions of Government Code Section 6250 et.seq. (Public Records Act).

16. PUBLICATION

- A. SCAQMD shall have the right of prior written approval of any document which shall be disseminated to the public by CONTRACTOR in which CONTRACTOR utilized information obtained from SCAQMD in connection with performance under this Contract.
- B. Information, data, documents, or reports developed by CONTRACTOR for SCAQMD, pursuant to this Contract, shall be part of SCAQMD public record unless otherwise indicated. CONTRACTOR may use or publish, at its own expense, such information provided to SCAQMD. The following acknowledgment of support and disclaimer must appear in each publication of materials, whether copyrighted or not, based upon or developed under this Contract.

"This report was prepared as a result of work sponsored, paid for, in whole or in part, by the South Coast Air Quality Management District (SCAQMD). The opinions, findings, conclusions, and recommendations are those of the author and do not necessarily represent the views of SCAQMD. SCAQMD, its officers, employees, contractors, and subcontractors make no warranty, expressed or implied, and assume no legal liability for the information in this report. SCAQMD has not approved or disapproved this report, nor has SCAQMD passed upon the accuracy or adequacy of the information contained herein."

C. CONTRACTOR shall inform its officers, employees, and subcontractors involved in the performance of this Contract of the restrictions contained herein and require compliance with the above.

17. NON-DISCRIMINATION - In the performance of this Contract, CONTRACTOR shall not discriminate in recruiting, hiring, promotion, demotion, or termination practices on the basis of race, religious creed, color, national origin, ancestry, sex, age, or physical or mental disability and shall comply with the provisions of the California Fair Employment & Housing Act (Government Code Section 12900 et seq.), the Federal Civil Rights Act of 1964 (P.L. 88-352) and all amendments thereto, Executive Order No. 11246 (30 Federal Register 12319), and all administrative rules and regulations issued pursuant to said Acts and Order.
18. SOLICITATION OF EMPLOYEES - CONTRACTOR expressly agrees that CONTRACTOR shall not, during the term of this Contract, nor for a period of six months after termination, solicit for employment, whether as an employee or independent contractor, any person who is or has been employed by SCAQMD during the term of this Contract without the consent of SCAQMD.
19. PROPERTY AND SECURITY - Without limiting CONTRACTOR obligations with regard to security, CONTRACTOR shall comply with all the rules and regulations established by SCAQMD for access to and activity in and around SCAQMD premises.
20. ASSIGNMENT - The rights granted hereby may not be assigned, sold, licensed, or otherwise transferred by either party without the prior written consent of the other, and any attempt by either party to do so shall be void upon inception.
21. NON-EFFECT OF WAIVER - The failure of CONTRACTOR or SCAQMD to insist upon the performance of any or all of the terms, covenants, or conditions of this Contract, or failure to exercise any rights or remedies hereunder, shall not be construed as a waiver or relinquishment of the future performance of any such terms, covenants, or conditions, or of the future exercise of such rights or remedies, unless otherwise provided for herein.
22. ATTORNEYS' FEES - In the event any action is filed in connection with the enforcement or interpretation of this Contract, each party shall bear its own attorneys' fees and costs.
23. FORCE MAJEURE - Neither SCAQMD nor CONTRACTOR shall be liable or deemed to be in default for any delay or failure in performance under this Contract or interruption of services resulting, directly or indirectly, from acts of God, civil or military authority, acts of public enemy, war, strikes, labor disputes, shortages of suitable parts, materials, labor or transportation, or any similar cause beyond the reasonable control of SCAQMD or CONTRACTOR.
24. SEVERABILITY - In the event that any one or more of the provisions contained in this Contract shall for any reason be held to be unenforceable in any respect by a court of competent jurisdiction, such holding shall not affect any other provisions of this Contract, and the Contract shall then be construed as if such unenforceable provisions are not a part hereof.
25. HEADINGS - Headings on the clauses of this Contract are for convenience and reference only, and the words contained therein shall in no way be held to explain, modify, amplify, or aid in the interpretation, construction, or meaning of the provisions of this Contract.
26. DUPLICATE EXECUTION - This Contract is executed in duplicate. Each signed copy shall have the force and effect of an original.

27. GOVERNING LAW - This Contract shall be construed and interpreted and the legal relations created thereby shall be determined in accordance with the laws of the State of California. Venue for resolution of any disputes under this Contract shall be Los Angeles County, California.
28. PRE-CONTRACT COSTS - Any costs incurred by CONTRACTOR prior to CONTRACTOR receipt of a fully executed Contract shall be incurred solely at the risk of the CONTRACTOR. In the event that a formal Contract is not executed, the SCAQMD shall not be liable for any amounts expended in anticipation of a formal Contract. If a formal Contract does result, pre-contract cost expenditures authorized by the Contract will be reimbursed in accordance with the Payment/Cost Schedule and payment provision of the Contract[OPTIONAL]
29. CITIZENSHIP AND ALIEN STATUS
- A. CONTRACTOR warrants that it fully complies with all laws regarding the employment of aliens and others, and that its employees performing services hereunder meet the citizenship or alien status requirements contained in federal and state statutes and regulations including, but not limited to, the Immigration Reform and Control Act of 1986 (P.L. 99-603). CONTRACTOR shall obtain from all covered employees performing services hereunder all verification and other documentation of employees' eligibility status required by federal statutes and regulations as they currently exist and as they may be hereafter amended. CONTRACTOR shall have a continuing obligation to verify and document the continuing employment authorization and authorized alien status of employees performing services under this Contract to insure continued compliance with all federal statutes and regulations. Notwithstanding the above, CONTRACTOR, in the performance of this Contract, shall not discriminate against any person in violation of 8 USC Section 1324b.
  - B. CONTRACTOR shall retain such documentation for all covered employees for the period described by law. CONTRACTOR shall indemnify, defend, and hold harmless SCAQMD, its officers and employees from employer sanctions and other liability which may be assessed against CONTRACTOR or SCAQMD, or both in connection with any alleged violation of federal statutes or regulations pertaining to the eligibility for employment of persons performing services under this Contract.
30. REQUIREMENT FOR FILING STATEMENT OF ECONOMIC INTERESTS - In accordance with the Political Reform Act of 1974 (Government Code Sec. 81000 et seq.) and regulations issued by the Fair Political Practices Commission (FPPC), SCAQMD has determined that the nature of the work to be performed under this Contract requires CONTRACTOR to submit a Form 700, Statement of Economic Interests for Designated Officials and Employees, for each of its employees assigned to work on this Contract. These forms may be obtained from SCAQMD's District Counsels' office.[OPTIONAL]
31. COMPLIANCE WITH SINGLE AUDIT ACT REQUIREMENTS [OPTIONAL - TO BE INCLUDED IN CONTRACTS WITH FOR-PROFIT CONTRACTORS WHICH HAVE FEDERAL PASS-THROUGH FUNDING] - During the term of the Contract, and for a period of three (3) years from the date of Contract expiration, and if requested in writing by the SCAQMD, CONTRACTOR shall allow the SCAQMD, its designated representatives and/or the cognizant Federal Audit Agency, access during normal business hours to all records and reports related to the work performed under this Contract. CONTRACTOR assumes sole responsibility for reimbursement to the Federal Agency funding the prime grant or contract, a sum of money equivalent to the amount of any expenditures disallowed should the SCAQMD, its designated representatives and/or the cognizant Federal Audit Agency rule through audit exception or some other appropriate means that expenditures from funds allocated to the CONTRACTOR were not made in compliance with the applicable cost principles, regulations of the funding agency, or the provisions of this Contract.



**[OPTIONAL - TO BE INCLUDED IN CONTRACTS WITH NON-PROFIT CONTRACTORS WHICH HAVE FEDERAL PASS-THROUGH FUNDING]** - Beginning with CONTRACTOR's current fiscal year and continuing through the term of this Contract, CONTRACTOR shall have a single or program-specific audit conducted in accordance with the requirements of the Office of Management and Budget (OMB) Circular A-133 (Audits of States, Local Governments and Non-Profit Organizations), if CONTRACTOR expended Five Hundred Thousand Dollars (\$500,000) or more in a year in Federal Awards. Such audit shall be conducted by a firm of independent accountants in accordance with Generally Accepted Government Audit Standards (GAGAS). Within thirty (30) days of Contract execution, CONTRACTOR shall forward to SCAQMD the most recent A-133 Audit Report issued by its independent auditors. Subsequent A-133 Audit Reports shall be submitted to the SCAQMD within thirty (30) days of issuance.

CONTRACTOR shall allow the SCAQMD, its designated representatives and/or the cognizant Federal Audit Agency, access during normal business hours to all records and reports related to the work performed under this Contract. CONTRACTOR assumes sole responsibility for reimbursement to the Federal Agency funding the prime grant or contract, a sum of money equivalent to the amount of any expenditures disallowed should the SCAQMD, its designated representatives and/or the cognizant Federal Audit Agency rule through audit exception or some other appropriate means that expenditures from funds allocated to the CONTRACTOR were not made in compliance with the applicable cost principles, regulations of the funding agency, or the provisions of this Contract.

32. OPTION TO EXTEND THE TERM OF THE CONTRACT - SCAQMD reserves the right to extend the contract for a one-year period commencing \*\*\*\*\* (enter date) at the (option price or Not-to-Exceed Amount) set forth in Attachment 2. In the event that SCAQMD elects to extend the contract, a written notice of its intent to extend the contract shall be provided to CONTRACTOR no later than thirty (30) days prior to Contract expiration. **[OPTIONAL]**
33. PROPOSAL INCORPORATION – CONTRACTOR's Technical Proposal dated \*\*\* submitted in response to Request for Proposal (RFP) #\*\*\*\*, is expressly incorporated herein by this reference and made a part hereof of this Contract. In the event of any conflict between the terms and conditions of this Contract and CONTRACTOR's Technical Proposal, this Contract shall govern and control. **[OPTIONAL]**
34. KEY PERSONNEL - *insert person's name* is deemed critical to the successful performance of this Contract. Any changes in key personnel by CONTRACTOR must be approved by SCAQMD. All substitute personnel must possess qualifications/experience equal to the original named key personnel and must be approved by SCAQMD. SCAQMD reserves the right to interview proposed substitute key personnel. **[OPTIONAL]**
35. PREVAILING WAGES – **[USE FOR INFRASTRUCTURE AND MAINTENANCE PROJECTS]** CONTRACTOR is alerted to the prevailing wage requirements of California Labor Code section 1770 et seq., and the compliance monitoring and enforcement of such requirements by the Department of Industrial Relations ("DIR"). CONTRACTOR and all of CONTRACTOR's subcontractors must comply with the California Public Works Contractor Registration Program and must be registered with the DIR to participate in public works projects. CONTRACTOR shall be responsible for determining the applicability of the provisions of California Labor Code and complying with the same, including, without limitation, obtaining from the Director of the Department of Industrial Relations the general prevailing rate of per diem wages and the general prevailing rate for holiday and overtime work, making the same available to any interested party upon request, paying any applicable prevailing rates, posting copies thereof at the job site and flowing all applicable prevailing wage rate requirements to its subcontractors. Proof of compliance with these requirements must be provided to SCAQMD upon request. CONTRACTOR shall indemnify, defend and hold

harmless the South Coast Air Quality Management District against any and all claims, demands, damages, defense costs or liabilities based on failure to adhere to the above referenced statutes.

- 36. SUBCONTRACTOR APPROVAL – If CONTRACTOR intends to subcontract all or a portion of the work under this Contract, then CONTRACTOR must first obtain written approval from SCAQMD’s Executive Officer or designee prior to subcontracting any work. Any material changes to the subcontract(s) that affect the scope of work, deliverable schedule, and/or payment/cost schedule shall also require the prior written approval of the Executive Officer or designee. No subcontract charges will be reimbursed unless the required approvals have been obtained from SCAQMD.
- 37. ENTIRE CONTRACT - This Contract represents the entire agreement between the parties hereto related to CONTRACTOR providing services to SCAQMD and there are no understandings, representations, or warranties of any kind except as expressly set forth herein. No waiver, alteration, or modification of any of the provisions herein shall be binding on any party unless in writing and signed by the party against whom enforcement of such waiver, alteration, or modification is sought.

IN WITNESS WHEREOF, the parties to this Contract have caused this Contract to be duly executed on their behalf by their authorized representatives.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

\*\*\*

By: \_\_\_\_\_  
Barry R. Wallerstein, D.Env., Executive Officer  
Dr. William A. Burke, Chairman, Governing Board

By: \_\_\_\_\_  
Name:  
Title:

Date: \_\_\_\_\_

Date: \_\_\_\_\_

ATTEST:  
Saundra McDaniel, Clerk of the Board

By: \_\_\_\_\_

APPROVED AS TO FORM:  
Kurt R. Wiese, General Counsel

By: \_\_\_\_\_

//Standard Boilerplate  
Revised: December 16, 2014

# **ATTACHMENT A**

## **CERTIFICATIONS AND REPRESENTATIONS**



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

## **Business Information Request**

Dear SCAQMD Contractor/Supplier:

The South Coast Air Quality Management District (SCAQMD) is committed to ensuring that our contractor/supplier records are current and accurate. If your firm is selected for award of a purchase order or contract, it is imperative that the information requested herein be supplied in a timely manner to facilitate payment of invoices. In order to process your payments, we need the enclosed information regarding your account. **Please review and complete the information identified on the following pages, complete the enclosed W-9 form, remember to sign both documents for our files, and return them as soon as possible to the address below:**

**Attention: Accounts Payable, Accounting Department  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765-4178**

If you do not return this information, we will not be able to establish you as a vendor. This will delay any payments and would still necessitate your submittal of the enclosed information to our Accounting department before payment could be initiated. Completion of this document and enclosed forms would ensure that your payments are processed timely and accurately.

If you have any questions or need assistance in completing this information, please contact Accounting at (909) 396-3777. We appreciate your cooperation in completing this necessary information.

Sincerely,

Michael B. O'Kelly  
Chief Financial Officer

DH:tm

Enclosures: Business Information Request  
Disadvantaged Business Certification  
W-9  
Form 590 Withholding Exemption Certificate  
Federal Contract Debarment Certification  
Campaign Contributions Disclosure  
Direct Deposit Authorization

REV 1/15



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

## BUSINESS INFORMATION REQUEST

Business Name	
Division of	
Subsidiary of	
Website Address	
Type of Business <i>Check One:</i>	<input type="checkbox"/> Individual <input type="checkbox"/> DBA, Name _____, County Filed in _____ <input type="checkbox"/> Corporation, ID No. _____ <input type="checkbox"/> LLC/LLP, ID No. _____ <input type="checkbox"/> Other _____

## REMITTING ADDRESS INFORMATION

Address			
City/Town			
State/Province		Zip	
Phone	(    )    -    Ext	Fax	(    )    -
Contact		Title	
E-mail Address			
Payment Name if Different			

All invoices must reference the corresponding Purchase Order Number(s)/Contract Number(s) if applicable and mailed to:

**Attention: Accounts Payable, Accounting Department**  
**South Coast Air Quality Management District**  
**21865 Copley Drive**  
**Diamond Bar, CA 91765-4178**

**DISADVANTAGED BUSINESS CERTIFICATION**

Federal guidance for utilization of disadvantaged business enterprises allows a vendor to be deemed a small business enterprise (SBE), minority

business enterprise (MBE) or women business enterprise (WBE) if it meets the criteria below.

- is certified by the Small Business Administration or
- is certified by a state or federal agency or
- is an independent MBE(s) or WBE(s) business concern which is at least 51 percent owned and controlled by minority group member(s) who are citizens of the United States.

Statements of certification:

As a prime contractor to the SCAQMD, \_\_\_\_\_ (name of business) will engage in good faith efforts to achieve the fair share in accordance with 40 CFR Section 33.301, and will follow the six affirmative steps listed below **for contracts or purchase orders funded in whole or in part by federal grants and contracts.**

1. Place qualified SBEs, MBEs, and WBEs on solicitation lists.
2. Assure that SBEs, MBEs, and WBEs are solicited whenever possible.
3. When economically feasible, divide total requirements into small tasks or quantities to permit greater participation by SBEs, MBEs, and WBEs.
4. Establish delivery schedules, if possible, to encourage participation by SBEs, MBEs, and WBEs.
5. Use services of Small Business Administration, Minority Business Development Agency of the Department of Commerce, and/or any agency authorized as a clearinghouse for SBEs, MBEs, and WBEs.
6. If subcontracts are to be let, take the above affirmative steps.

**Self-Certification Verification: Also for use in awarding additional points, as applicable, in accordance with SCAQMD Procurement Policy and Procedure:**

Check all that apply:

- |   |  |
|---|--|
| <input type="checkbox"/> Small Business Enterprise/Small Business Joint Venture | <input type="checkbox"/> Women-owned Business Enterprise                               |
| <input type="checkbox"/> Local business   | <input type="checkbox"/> Disabled Veteran-owned Business Enterprise/DVBE Joint Venture |
| <input type="checkbox"/> Minority-owned Business Enterprise                     |  |

Percent of ownership: \_\_\_\_\_ %

Name of Qualifying Owner(s): \_\_\_\_\_

**State of California Public Works Contractor Registration No. \_\_\_\_\_ MUST BE INCLUDED IF BID PROPOSAL IS FOR PUBLIC WORKS PROJECT.**

I, the undersigned, hereby declare that to the best of my knowledge the above information is accurate. Upon penalty of perjury, I certify information submitted is factual.

_____	_____
<i>NAME</i>	<i>TITLE</i>
_____	_____
<i>TELEPHONE NUMBER</i>	<i>DATE</i>

## Definitions

**Disabled Veteran-Owned Business Enterprise** means a business that meets all of the following criteria:

- is a sole proprietorship or partnership of which is at least 51 percent owned by one or more disabled veterans, or in the case of any business whose stock is publicly held, at least 51 percent of the stock is owned by one or more disabled veterans; a subsidiary which is wholly owned by a parent corporation but only if at least 51 percent of the voting stock of the parent corporation is owned by one or more disabled veterans; or a joint venture in which at least 51 percent of the joint venture's management and control and earnings are held by one or more disabled veterans.
- the management and control of the daily business operations are by one or more disabled veterans. The disabled veterans who exercise management and control are not required to be the same disabled veterans as the owners of the business.
- is a sole proprietorship, corporation, partnership, or joint venture with its primary headquarters office located in the United States and which is not a branch or subsidiary of a foreign corporation, firm, or other foreign-based business.

**Joint Venture** means that one party to the joint venture is a DVBE and owns at least 51 percent of the joint venture. In the case of a joint venture formed for a single project this means that DVBE will receive at least 51 percent of the project dollars.

**Local Business** means a business that meets all of the following criteria:

- has an ongoing business within the boundary of the SCAQMD at the time of bid application.
- performs 90 percent of the work within SCAQMD's jurisdiction.

**Minority-Owned Business Enterprise** means a business that meets all of the following criteria:

- is at least 51 percent owned by one or more minority persons or in the case of any business whose stock is publicly held, at least 51 percent of the stock is owned by one or more minority persons.
- is a business whose management and daily business operations are controlled or owned by one or more minority person.
- is a business which is a sole proprietorship, corporation, partnership, joint venture, an association, or a cooperative with its primary headquarters office located in the United States, which is not a branch or subsidiary of a foreign corporation, foreign firm, or other foreign business.

“Minority” person means a Black American, Hispanic American, Native American (including American Indian, Eskimo, Aleut, and Native Hawaiian), Asian-Indian American (including a person whose origins are from India, Pakistan, or Bangladesh), Asian-Pacific American (including a person whose origins are from Japan, China, the Philippines, Vietnam, Korea, Samoa, Guam, the United States Trust Territories of the Pacific, Northern Marianas, Laos, Cambodia, or Taiwan).

**Small Business Enterprise** means a business that meets the following criteria:

- a. 1) an independently owned and operated business; 2) not dominant in its field of operation; 3) together with affiliates is either:
  - **A service, construction, or non-manufacturer with 100 or fewer employees, and average annual gross receipts of ten million dollars (\$10,000,000) or less over the previous three years, or**
  - A manufacturer with 100 or fewer employees.
- b. Manufacturer means a business that is both of the following:
  - 1) Primarily engaged in the chemical or mechanical transformation of raw materials or processed substances into new products.
  - 2) Classified between Codes 311000 to 339000, inclusive, of the North American Industrial Classification System (NAICS) Manual published by the United States Office of Management and Budget, 2007 edition.

**Small Business Joint Venture** means that one party to the joint venture is a Small Business and owns at least 51 percent of the joint venture. In the case of a joint venture formed for a single project this means that the Small Business will receive at least 51 percent of the project dollars.

**Women-Owned Business Enterprise** means a business that meets all of the following criteria:

- is at least 51 percent owned by one or more women or in the case of any business whose stock is publicly held, at least 51 percent of the stock is owned by one or more women.
- is a business whose management and daily business operations are controlled or owned by one or more women.
- is a business which is a sole proprietorship, corporation, partnership, or a joint venture, with its primary headquarters office located in the United States, which is not a branch or subsidiary of a foreign corporation, foreign firm, or other foreign business.



## Request for Taxpayer Identification Number and Certification

**Give Form to the  
 requester. Do not  
 send to the IRS.**

<b>Print or type See Specific Instructions on page 2.</b>	<b>1</b>	Name (as shown on your income tax return). Name is required on this line; do not leave this line blank.	
	<b>2</b>	Business name/disregarded entity name, if different from above	
	<b>3</b>	Check appropriate box for federal tax classification; check only <b>one</b> of the following seven boxes: <input type="checkbox"/> Individual/sole proprietor or single-member LLC <input type="checkbox"/> C Corporation <input type="checkbox"/> S Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> Trust/estate <input type="checkbox"/> Limited liability company. Enter the tax classification (C=C corporation, S=S corporation, P=partnership) ▶ _____ <b>Note.</b> For a single-member LLC that is disregarded, do not check LLC; check the appropriate box in the line above for the tax classification of the single-member owner. <input type="checkbox"/> Other (see instructions) ▶ _____	
	<b>4</b>	Exemptions (codes apply only to certain entities, not individuals; see instructions on page 3): Exempt payee code (if any) _____ Exemption from FATCA reporting code (if any) _____ <i>(Applies to accounts maintained outside the U.S.)</i>	
	<b>5</b>	Address (number, street, and apt. or suite no.)	Requester's name and address (optional)
	<b>6</b>	City, state, and ZIP code	
	<b>7</b>	List account number(s) here (optional)	

### Part I Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. The TIN provided must match the name given on line 1 to avoid backup withholding. For individuals, this is generally your social security number (SSN). However, for a resident alien, sole proprietor, or disregarded entity, see the Part I instructions on page 3. For other entities, it is your employer identification number (EIN). If you do not have a number, see *How to get a TIN* on page 3.

<b>Social security number</b>																							
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**Note.** If the account is in more than one name, see the instructions for line 1 and the chart on page 4 for guidelines on whose number to enter.

### Part II Certification

- Under penalties of perjury, I certify that:
- The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me); and
  - I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding; and
  - I am a U.S. citizen or other U.S. person (defined below); and
  - The FATCA code(s) entered on this form (if any) indicating that I am exempt from FATCA reporting is correct.

**Certification instructions.** You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and generally, payments other than interest and dividends, you are not required to sign the certification, but you must provide your correct TIN. See the instructions on page 3.

<b>Sign Here</b>	Signature of U.S. person ▶	Date ▶
------------------	----------------------------	--------

### General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.  
**Future developments.** Information about developments affecting Form W-9 (such as legislation enacted after we release it) is at [www.irs.gov/fw9](http://www.irs.gov/fw9).

#### Purpose of Form

An individual or entity (Form W-9 requester) who is required to file an information return with the IRS must obtain your correct taxpayer identification number (TIN) which may be your social security number (SSN), individual taxpayer identification number (ITIN), adoption taxpayer identification number (ATIN), or employer identification number (EIN), to report on an information return the amount paid to you, or other amount reportable on an information return. Examples of information returns include, but are not limited to, the following:

- Form 1099-INT (interest earned or paid)
- Form 1099-DIV (dividends, including those from stocks or mutual funds)
- Form 1099-MISC (various types of income, prizes, awards, or gross proceeds)
- Form 1099-B (stock or mutual fund sales and certain other transactions by brokers)
- Form 1099-S (proceeds from real estate transactions)
- Form 1099-K (merchant card and third party network transactions)

- Form 1098 (home mortgage interest), 1098-E (student loan interest), 1098-T (tuition)
  - Form 1099-C (canceled debt)
  - Form 1099-A (acquisition or abandonment of secured property)
- Use Form W-9 only if you are a U.S. person (including a resident alien), to provide your correct TIN.
- If you do not return Form W-9 to the requester with a TIN, you might be subject to backup withholding. See What is backup withholding? on page 2.*
- By signing the filled-out form, you:
- Certify that the TIN you are giving is correct (or you are waiting for a number to be issued),
  - Certify that you are not subject to backup withholding, or
  - Claim exemption from backup withholding if you are a U.S. exempt payee. If applicable, you are also certifying that as a U.S. person, your allocable share of any partnership income from a U.S. trade or business is not subject to the withholding tax on foreign partners' share of effectively connected income, and
  - Certify that FATCA code(s) entered on this form (if any) indicating that you are exempt from the FATCA reporting, is correct. See *What is FATCA reporting?* on page 2 for further information.

**Note.** If you are a U.S. person and a requester gives you a form other than Form W-9 to request your TIN, you must use the requester's form if it is substantially similar to this Form W-9.

**Definition of a U.S. person.** For federal tax purposes, you are considered a U.S. person if you are:

- An individual who is a U.S. citizen or U.S. resident alien;
- A partnership, corporation, company, or association created or organized in the United States or under the laws of the United States;
- An estate (other than a foreign estate); or
- A domestic trust (as defined in Regulations section 301.7701-7).

**Special rules for partnerships.** Partnerships that conduct a trade or business in the United States are generally required to pay a withholding tax under section 1446 on any foreign partners' share of effectively connected taxable income from such business. Further, in certain cases where a Form W-9 has not been received, the rules under section 1446 require a partnership to presume that a partner is a foreign person, and pay the section 1446 withholding tax. Therefore, if you are a U.S. person that is a partner in a partnership conducting a trade or business in the United States, provide Form W-9 to the partnership to establish your U.S. status and avoid section 1446 withholding on your share of partnership income.

In the cases below, the following person must give Form W-9 to the partnership for purposes of establishing its U.S. status and avoiding withholding on its allocable share of net income from the partnership conducting a trade or business in the United States:

- In the case of a disregarded entity with a U.S. owner, the U.S. owner of the disregarded entity and not the entity;
- In the case of a grantor trust with a U.S. grantor or other U.S. owner, generally, the U.S. grantor or other U.S. owner of the grantor trust and not the trust; and
- In the case of a U.S. trust (other than a grantor trust), the U.S. trust (other than a grantor trust) and not the beneficiaries of the trust.

**Foreign person.** If you are a foreign person or the U.S. branch of a foreign bank that has elected to be treated as a U.S. person, do not use Form W-9. Instead, use the appropriate Form W-8 or Form 8233 (see Publication 515, Withholding of Tax on Nonresident Aliens and Foreign Entities).

**Nonresident alien who becomes a resident alien.** Generally, only a nonresident alien individual may use the terms of a tax treaty to reduce or eliminate U.S. tax on certain types of income. However, most tax treaties contain a provision known as a "saving clause." Exceptions specified in the saving clause may permit an exemption from tax to continue for certain types of income even after the payee has otherwise become a U.S. resident alien for tax purposes.

If you are a U.S. resident alien who is relying on an exception contained in the saving clause of a tax treaty to claim an exemption from U.S. tax on certain types of income, you must attach a statement to Form W-9 that specifies the following five items:

1. The treaty country. Generally, this must be the same treaty under which you claimed exemption from tax as a nonresident alien.
2. The treaty article addressing the income.
3. The article number (or location) in the tax treaty that contains the saving clause and its exceptions.
4. The type and amount of income that qualifies for the exemption from tax.
5. Sufficient facts to justify the exemption from tax under the terms of the treaty article.

**Example.** Article 20 of the U.S.-China income tax treaty allows an exemption from tax for scholarship income received by a Chinese student temporarily present in the United States. Under U.S. law, this student will become a resident alien for tax purposes if his or her stay in the United States exceeds 5 calendar years. However, paragraph 2 of the first Protocol to the U.S.-China treaty (dated April 30, 1984) allows the provisions of Article 20 to continue to apply even after the Chinese student becomes a resident alien of the United States. A Chinese student who qualifies for this exception (under paragraph 2 of the first protocol) and is relying on this exception to claim an exemption from tax on his or her scholarship or fellowship income would attach to Form W-9 a statement that includes the information described above to support that exemption.

If you are a nonresident alien or a foreign entity, give the requester the appropriate completed Form W-8 or Form 8233.

## Backup Withholding

**What is backup withholding?** Persons making certain payments to you must under certain conditions withhold and pay to the IRS 28% of such payments. This is called "backup withholding." Payments that may be subject to backup withholding include interest, tax-exempt interest, dividends, broker and barter exchange transactions, rents, royalties, nonemployee pay, payments made in settlement of payment card and third party network transactions, and certain payments from fishing boat operators. Real estate transactions are not subject to backup withholding.

You will not be subject to backup withholding on payments you receive if you give the requester your correct TIN, make the proper certifications, and report all your taxable interest and dividends on your tax return.

**Payments you receive will be subject to backup withholding if:**

1. You do not furnish your TIN to the requester,
2. You do not certify your TIN when required (see the Part II instructions on page 3 for details),

3. The IRS tells the requester that you furnished an incorrect TIN,

4. The IRS tells you that you are subject to backup withholding because you did not report all your interest and dividends on your tax return (for reportable interest and dividends only), or

5. You do not certify to the requester that you are not subject to backup withholding under 4 above (for reportable interest and dividend accounts opened after 1983 only).

Certain payees and payments are exempt from backup withholding. See *Exempt payee code* on page 3 and the separate Instructions for the Requester of Form W-9 for more information.

Also see *Special rules for partnerships* above.

## What is FATCA reporting?

The Foreign Account Tax Compliance Act (FATCA) requires a participating foreign financial institution to report all United States account holders that are specified United States persons. Certain payees are exempt from FATCA reporting. See *Exemption from FATCA reporting code* on page 3 and the Instructions for the Requester of Form W-9 for more information.

## Updating Your Information

You must provide updated information to any person to whom you claimed to be an exempt payee if you are no longer an exempt payee and anticipate receiving reportable payments in the future from this person. For example, you may need to provide updated information if you are a C corporation that elects to be an S corporation, or if you no longer are tax exempt. In addition, you must furnish a new Form W-9 if the name or TIN changes for the account; for example, if the grantor of a grantor trust dies.

## Penalties

**Failure to furnish TIN.** If you fail to furnish your correct TIN to a requester, you are subject to a penalty of \$50 for each such failure unless your failure is due to reasonable cause and not to willful neglect.

**Civil penalty for false information with respect to withholding.** If you make a false statement with no reasonable basis that results in no backup withholding, you are subject to a \$500 penalty.

**Criminal penalty for falsifying information.** Willfully falsifying certifications or affirmations may subject you to criminal penalties including fines and/or imprisonment.

**Misuse of TINs.** If the requester discloses or uses TINs in violation of federal law, the requester may be subject to civil and criminal penalties.

## Specific Instructions

### Line 1

You must enter one of the following on this line; **do not** leave this line blank. The name should match the name on your tax return.

If this Form W-9 is for a joint account, list first, and then circle, the name of the person or entity whose number you entered in Part I of Form W-9.

a. **Individual.** Generally, enter the name shown on your tax return. If you have changed your last name without informing the Social Security Administration (SSA) of the name change, enter your first name, the last name as shown on your social security card, and your new last name.

**Note. ITIN applicant:** Enter your individual name as it was entered on your Form W-7 application, line 1a. This should also be the same as the name you entered on the Form 1040/1040A/1040EZ you filed with your application.

b. **Sole proprietor or single-member LLC.** Enter your individual name as shown on your 1040/1040A/1040EZ on line 1. You may enter your business, trade, or "doing business as" (DBA) name on line 2.

c. **Partnership, LLC that is not a single-member LLC, C Corporation, or S Corporation.** Enter the entity's name as shown on the entity's tax return on line 1 and any business, trade, or DBA name on line 2.

d. **Other entities.** Enter your name as shown on required U.S. federal tax documents on line 1. This name should match the name shown on the charter or other legal document creating the entity. You may enter any business, trade, or DBA name on line 2.

e. **Disregarded entity.** For U.S. federal tax purposes, an entity that is disregarded as an entity separate from its owner is treated as a "disregarded entity." See Regulations section 301.7701-2(c)(2)(iii). Enter the owner's name on line 1. The name of the entity entered on line 1 should never be a disregarded entity. The name on line 1 should be the name shown on the income tax return on which the income should be reported. For example, if a foreign LLC that is treated as a disregarded entity for U.S. federal tax purposes has a single owner that is a U.S. person, the U.S. owner's name is required to be provided on line 1. If the direct owner of the entity is also a disregarded entity, enter the first owner that is not disregarded for federal tax purposes. Enter the disregarded entity's name on line 2, "Business name/disregarded entity name." If the owner of the disregarded entity is a foreign person, the owner must complete an appropriate Form W-8 instead of a Form W-9. This is the case even if the foreign person has a U.S. TIN.

**Line 2**

If you have a business name, trade name, DBA name, or disregarded entity name, you may enter it on line 2.

**Line 3**

Check the appropriate box in line 3 for the U.S. federal tax classification of the person whose name is entered on line 1. Check only one box in line 3.

**Limited Liability Company (LLC).** If the name on line 1 is an LLC treated as a partnership for U.S. federal tax purposes, check the "Limited Liability Company" box and enter "P" in the space provided. If the LLC has filed Form 8832 or 2553 to be taxed as a corporation, check the "Limited Liability Company" box and in the space provided enter "C" for C corporation or "S" for S corporation. If it is a single-member LLC that is a disregarded entity, do not check the "Limited Liability Company" box; instead check the first box in line 3 "Individual/sole proprietor or single-member LLC."

**Line 4, Exemptions**

If you are exempt from backup withholding and/or FATCA reporting, enter in the appropriate space in line 4 any code(s) that may apply to you.

**Exempt payee code.**

- Generally, individuals (including sole proprietors) are not exempt from backup withholding.
- Except as provided below, corporations are exempt from backup withholding for certain payments, including interest and dividends.
- Corporations are not exempt from backup withholding for payments made in settlement of payment card or third party network transactions.
- Corporations are not exempt from backup withholding with respect to attorneys' fees or gross proceeds paid to attorneys, and corporations that provide medical or health care services are not exempt with respect to payments reportable on Form 1099-MISC.

The following codes identify payees that are exempt from backup withholding. Enter the appropriate code in the space in line 4.

- 1—An organization exempt from tax under section 501(a), any IRA, or a custodial account under section 403(b)(7) if the account satisfies the requirements of section 401(f)(2)
- 2—The United States or any of its agencies or instrumentalities
- 3—A state, the District of Columbia, a U.S. commonwealth or possession, or any of their political subdivisions or instrumentalities
- 4—A foreign government or any of its political subdivisions, agencies, or instrumentalities
- 5—A corporation
- 6—A dealer in securities or commodities required to register in the United States, the District of Columbia, or a U.S. commonwealth or possession
- 7—A futures commission merchant registered with the Commodity Futures Trading Commission
- 8—A real estate investment trust
- 9—An entity registered at all times during the tax year under the Investment Company Act of 1940
- 10—A common trust fund operated by a bank under section 584(a)
- 11—A financial institution
- 12—A middleman known in the investment community as a nominee or custodian
- 13—A trust exempt from tax under section 664 or described in section 4947

The following chart shows types of payments that may be exempt from backup withholding. The chart applies to the exempt payees listed above, 1 through 13.

IF the payment is for . . .	THEN the payment is exempt for . . .
Interest and dividend payments	All exempt payees except for 7
Broker transactions	Exempt payees 1 through 4 and 6 through 11 and all C corporations. S corporations must not enter an exempt payee code because they are exempt only for sales of noncovered securities acquired prior to 2012.
Barter exchange transactions and patronage dividends	Exempt payees 1 through 4
Payments over \$600 required to be reported and direct sales over \$5,000 <sup>1</sup>	Generally, exempt payees 1 through 5 <sup>2</sup>
Payments made in settlement of payment card or third party network transactions	Exempt payees 1 through 4

<sup>1</sup> See Form 1099-MISC, Miscellaneous Income, and its instructions.

<sup>2</sup> However, the following payments made to a corporation and reportable on Form 1099-MISC are not exempt from backup withholding: medical and health care payments, attorneys' fees, gross proceeds paid to an attorney reportable under section 6045(f), and payments for services paid by a federal executive agency.

**Exemption from FATCA reporting code.** The following codes identify payees that are exempt from reporting under FATCA. These codes apply to persons submitting this form for accounts maintained outside of the United States by certain foreign financial institutions. Therefore, if you are only submitting this form for an account you hold in the United States, you may leave this field blank. Consult with the person requesting this form if you are uncertain if the financial institution is subject to these requirements. A requester may indicate that a code is not required by providing you with a Form W-9 with "Not Applicable" (or any similar indication) written or printed on the line for a FATCA exemption code.

A—An organization exempt from tax under section 501(a) or any individual retirement plan as defined in section 7701(a)(37)

B—The United States or any of its agencies or instrumentalities

C—A state, the District of Columbia, a U.S. commonwealth or possession, or any of their political subdivisions or instrumentalities

D—A corporation the stock of which is regularly traded on one or more established securities markets, as described in Regulations section 1.1472-1(c)(1)(i)

E—A corporation that is a member of the same expanded affiliated group as a corporation described in Regulations section 1.1472-1(c)(1)(i)

F—A dealer in securities, commodities, or derivative financial instruments (including notional principal contracts, futures, forwards, and options) that is registered as such under the laws of the United States or any state

G—A real estate investment trust

H—A regulated investment company as defined in section 851 or an entity registered at all times during the tax year under the Investment Company Act of 1940

I—A common trust fund as defined in section 584(a)

J—A bank as defined in section 581

K—A broker

L—A trust exempt from tax under section 664 or described in section 4947(a)(1)

M—A tax exempt trust under a section 403(b) plan or section 457(g) plan

**Note.** You may wish to consult with the financial institution requesting this form to determine whether the FATCA code and/or exempt payee code should be completed.

**Line 5**

Enter your address (number, street, and apartment or suite number). This is where the requester of this Form W-9 will mail your information returns.

**Line 6**

Enter your city, state, and ZIP code.

**Part I. Taxpayer Identification Number (TIN)**

**Enter your TIN in the appropriate box.** If you are a resident alien and you do not have and are not eligible to get an SSN, your TIN is your IRS individual taxpayer identification number (ITIN). Enter it in the social security number box. If you do not have an ITIN, see *How to get a TIN* below.

If you are a sole proprietor and you have an EIN, you may enter either your SSN or EIN. However, the IRS prefers that you use your SSN.

If you are a single-member LLC that is disregarded as an entity separate from its owner (see *Limited Liability Company (LLC)* on this page), enter the owner's SSN (or EIN, if the owner has one). Do not enter the disregarded entity's EIN. If the LLC is classified as a corporation or partnership, enter the entity's EIN.

**Note.** See the chart on page 4 for further clarification of name and TIN combinations.

**How to get a TIN.** If you do not have a TIN, apply for one immediately. To apply for an SSN, get Form SS-5, Application for a Social Security Card, from your local SSA office or get this form online at [www.ssa.gov](http://www.ssa.gov). You may also get this form by calling 1-800-772-1213. Use Form W-7, Application for IRS Individual Taxpayer Identification Number, to apply for an ITIN, or Form SS-4, Application for Employer Identification Number, to apply for an EIN. You can apply for an EIN online by accessing the IRS website at [www.irs.gov/businesses](http://www.irs.gov/businesses) and clicking on Employer Identification Number (EIN) under Starting a Business. You can get Forms W-7 and SS-4 from the IRS by visiting [IRS.gov](http://IRS.gov) or by calling 1-800-TAX-FORM (1-800-829-3676).

If you are asked to complete Form W-9 but do not have a TIN, apply for a TIN and write "Applied For" in the space for the TIN, sign and date the form, and give it to the requester. For interest and dividend payments, and certain payments made with respect to readily tradable instruments, generally you will have 60 days to get a TIN and give it to the requester before you are subject to backup withholding on payments. The 60-day rule does not apply to other types of payments. You will be subject to backup withholding on all such payments until you provide your TIN to the requester.

**Note.** Entering "Applied For" means that you have already applied for a TIN or that you intend to apply for one soon.

**Caution:** A disregarded U.S. entity that has a foreign owner must use the appropriate Form W-8.

**Part II. Certification**

To establish to the withholding agent that you are a U.S. person, or resident alien, sign Form W-9. You may be requested to sign by the withholding agent even if items 1, 4, or 5 below indicate otherwise.

For a joint account, only the person whose TIN is shown in Part I should sign (when required). In the case of a disregarded entity, the person identified on line 1 must sign. Exempt payees, see *Exempt payee code* earlier.

**Signature requirements.** Complete the certification as indicated in items 1 through 5 below.

**1. Interest, dividend, and barter exchange accounts opened before 1984 and broker accounts considered active during 1983.** You must give your correct TIN, but you do not have to sign the certification.

**2. Interest, dividend, broker, and barter exchange accounts opened after 1983 and broker accounts considered inactive during 1983.** You must sign the certification or backup withholding will apply. If you are subject to backup withholding and you are merely providing your correct TIN to the requester, you must cross out item 2 in the certification before signing the form.

**3. Real estate transactions.** You must sign the certification. You may cross out item 2 of the certification.

**4. Other payments.** You must give your correct TIN, but you do not have to sign the certification unless you have been notified that you have previously given an incorrect TIN. "Other payments" include payments made in the course of the requester's trade or business for rents, royalties, goods (other than bills for merchandise), medical and health care services (including payments to corporations), payments to a nonemployee for services, payments made in settlement of payment card and third party network transactions, payments to certain fishing boat crew members and fishermen, and gross proceeds paid to attorneys (including payments to corporations).

**5. Mortgage interest paid by you, acquisition or abandonment of secured property, cancellation of debt, qualified tuition program payments (under section 529), IRA, Coverdell ESA, Archer MSA or HSA contributions or distributions, and pension distributions.** You must give your correct TIN, but you do not have to sign the certification.

**What Name and Number To Give the Requester**

For this type of account:	Give name and SSN of:
1. Individual	The individual
2. Two or more individuals (joint account)	The actual owner of the account or, if combined funds, the first individual on the account <sup>1</sup>
3. Custodian account of a minor (Uniform Gift to Minors Act)	The minor <sup>2</sup>
4. a. The usual revocable savings trust (grantor is also trustee) b. So-called trust account that is not a legal or valid trust under state law	The grantor-trustee <sup>1</sup>  The actual owner <sup>1</sup>
5. Sole proprietorship or disregarded entity owned by an individual	The owner <sup>3</sup>
6. Grantor trust filing under Optional Form 1099 Filing Method 1 (see Regulations section 1.671-4(b)(2)(i)(A))	The grantor <sup>4</sup>
For this type of account:	Give name and EIN of:
7. Disregarded entity not owned by an individual	The owner
8. A valid trust, estate, or pension trust	Legal entity <sup>4</sup>
9. Corporation or LLC electing corporate status on Form 8832 or Form 2553	The corporation
10. Association, club, religious, charitable, educational, or other tax-exempt organization	The organization
11. Partnership or multi-member LLC	The partnership
12. A broker or registered nominee	The broker or nominee
13. Account with the Department of Agriculture in the name of a public entity (such as a state or local government, school district, or prison) that receives agricultural program payments	The public entity
14. Grantor trust filing under the Form 1041 Filing Method or the Optional Form 1099 Filing Method 2 (see Regulations section 1.671-4(b)(2)(i)(B))	The trust

<sup>1</sup> List first and circle the name of the person whose number you furnish. If only one person on a joint account has an SSN, that person's number must be furnished.

<sup>2</sup> Circle the minor's name and furnish the minor's SSN.

<sup>3</sup> You must show your individual name and you may also enter your business or DBA name on the "Business name/disregarded entity" name line. You may use either your SSN or EIN (if you have one), but the IRS encourages you to use your SSN.

<sup>4</sup> List first and circle the name of the trust, estate, or pension trust. (Do not furnish the TIN of the personal representative or trustee unless the legal entity itself is not designated in the account title.) Also see *Special rules for partnerships* on page 2.

**\*Note.** Grantor also must provide a Form W-9 to trustee of trust.

**Note.** If no name is circled when more than one name is listed, the number will be considered to be that of the first name listed.

**Secure Your Tax Records from Identity Theft**

Identity theft occurs when someone uses your personal information such as your name, SSN, or other identifying information, without your permission, to commit fraud or other crimes. An identity thief may use your SSN to get a job or may file a tax return using your SSN to receive a refund.

To reduce your risk:

- Protect your SSN,
- Ensure your employer is protecting your SSN, and
- Be careful when choosing a tax preparer.

If your tax records are affected by identity theft and you receive a notice from the IRS, respond right away to the name and phone number printed on the IRS notice or letter.

If your tax records are not currently affected by identity theft but you think you are at risk due to a lost or stolen purse or wallet, questionable credit card activity or credit report, contact the IRS Identity Theft Hotline at 1-800-908-4490 or submit Form 14039.

For more information, see Publication 4535, Identity Theft Prevention and Victim Assistance.

Victims of identity theft who are experiencing economic harm or a system problem, or are seeking help in resolving tax problems that have not been resolved through normal channels, may be eligible for Taxpayer Advocate Service (TAS) assistance. You can reach TAS by calling the TAS toll-free case intake line at 1-877-777-4778 or TTY/TDD 1-800-829-4059.

**Protect yourself from suspicious emails or phishing schemes.** Phishing is the creation and use of email and websites designed to mimic legitimate business emails and websites. The most common act is sending an email to a user falsely claiming to be an established legitimate enterprise in an attempt to scam the user into surrendering private information that will be used for identity theft.

The IRS does not initiate contacts with taxpayers via emails. Also, the IRS does not request personal detailed information through email or ask taxpayers for the PIN numbers, passwords, or similar secret access information for their credit card, bank, or other financial accounts.

If you receive an unsolicited email claiming to be from the IRS, forward this message to [phishing@irs.gov](mailto:phishing@irs.gov). You may also report misuse of the IRS name, logo, or other IRS property to the Treasury Inspector General for Tax Administration (TIGTA) at 1-800-366-4484. You can forward suspicious emails to the Federal Trade Commission at: [spam@uce.gov](mailto:spam@uce.gov) or contact them at [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft) or 1-877-IDTHEFT (1-877-438-4338).

Visit [IRS.gov](http://IRS.gov) to learn more about identity theft and how to reduce your risk.

**Privacy Act Notice**

Section 6109 of the Internal Revenue Code requires you to provide your correct TIN to persons (including federal agencies) who are required to file information returns with the IRS to report interest, dividends, or certain other income paid to you; mortgage interest you paid; the acquisition or abandonment of secured property; the cancellation of debt; or contributions you made to an IRA, Archer MSA, or HSA. The person collecting this form uses the information on the form to file information returns with the IRS, reporting the above information. Routine uses of this information include giving it to the Department of Justice for civil and criminal litigation and to cities, states, the District of Columbia, and U.S. commonwealths and possessions for use in administering their laws. The information also may be disclosed to other countries under a treaty, to federal and state agencies to enforce civil and criminal laws, or to federal law enforcement and intelligence agencies to combat terrorism. You must provide your TIN whether or not you are required to file a tax return. Under section 3406, payers must generally withhold a percentage of taxable interest, dividend, and certain other payments to a payee who does not give a TIN to the payer. Certain penalties may also apply for providing false or fraudulent information.

# 2015 Withholding Exemption Certificate

# 590

The payee completes this form and submits it to the withholding agent.

### Withholding Agent (Type or print)

Name \_\_\_\_\_

### Payee

Name \_\_\_\_\_

SSN or ITIN  FEIN  CA Corp no.  CA SOS file no.

Address (apt./ste., room, PO Box, or PMB no.) \_\_\_\_\_

City (If you have a foreign address, see instructions.) \_\_\_\_\_

State \_\_\_\_\_ ZIP Code \_\_\_\_\_

### Exemption Reason

Check only one reason box below that applies to the payee.

By checking the appropriate box below, the Payee certifies the reason for the exemption from the California income tax withholding requirements on payment(s) made to the entity or individual.

- Individuals — Certification of Residency:**  
I am a resident of California and I reside at the address shown above. If I become a nonresident at any time, I will promptly notify the withholding agent. See instructions for General Information D, Definitions.
- Corporations:**  
The corporation has a permanent place of business in California at the address shown above or is qualified through the California Secretary of State (SOS) to do business in California. The corporation will file a California tax return. If this corporation ceases to have a permanent place of business in California or ceases to do any of the above, I will promptly notify the withholding agent. See instructions for General Information D, Definitions.
- Partnerships or Limited Liability Companies (LLCs):**  
The partnership or LLC has a permanent place of business in California at the address shown above or is registered with the California SOS, and is subject to the laws of California. The partnership or LLC will file a California tax return. If the partnership or LLC ceases to do any of the above, I will promptly inform the withholding agent. For withholding purposes, a limited liability partnership (LLP) is treated like any other partnership.
- Tax-Exempt Entities:**  
The entity is exempt from tax under California Revenue and Taxation Code (R&TC) Section 23701 \_\_\_\_\_ (insert letter) or Internal Revenue Code Section 501(c) \_\_\_\_\_ (insert number). If this entity ceases to be exempt from tax, I will promptly notify the withholding agent. Individuals cannot be tax-exempt entities.
- Insurance Companies, Individual Retirement Arrangements (IRAs), or Qualified Pension/Profit Sharing Plans:**  
The entity is an insurance company, IRA, or a federally qualified pension or profit-sharing plan.
- California Trusts:**  
At least one trustee and one noncontingent beneficiary of the above-named trust is a California resident. The trust will file a California fiduciary tax return. If the trustee or noncontingent beneficiary becomes a nonresident at any time, I will promptly notify the withholding agent.
- Estates — Certification of Residency of Deceased Person:**  
I am the executor of the above-named person's estate or trust. The decedent was a California resident at the time of death. The estate will file a California fiduciary tax return.
- Nonmilitary Spouse of a Military Servicemember:**  
I am a nonmilitary spouse of a military servicemember and I meet the Military Spouse Residency Relief Act (MSRRA) requirements. See instructions for General Information E, MSRRA.

**CERTIFICATE OF PAYEE:** Payee must complete and sign below.

Under penalties of perjury, I hereby certify that the information provided in this document is, to the best of my knowledge, true and correct. If conditions change, I will promptly notify the withholding agent.

Payee's name and title (type or print) \_\_\_\_\_ Telephone (\_\_\_\_) \_\_\_\_\_

Payee's signature ► \_\_\_\_\_ Date \_\_\_\_\_

# 2015 Instructions for Form 590

## Withholding Exemption Certificate

References in these instructions are to the California Revenue and Taxation Code (R&TC).

### General Information

**Registered Domestic Partners (RDP)** – For purposes of California income tax, references to a spouse, husband, or wife also refer to a Registered Domestic Partner (RDP) unless otherwise specified. For more information on RDPs, get FTB Pub. 737, Tax Information for Registered Domestic Partners.

### A Purpose

Use Form 590, Withholding Exemption Certificate, to certify an exemption from nonresident withholding.

Form 590 does not apply to payments of backup withholding. For information on California backup withholding, go to [ftb.ca.gov](http://ftb.ca.gov) and search for **backup withholding**.

Form 590 does not apply to payments for wages to employees. Wage withholding is administered by the California Employment Development Department (EDD). For more information, go to [edd.ca.gov](http://edd.ca.gov) or call 888.745.3886.

**Do not use Form 590 to certify an exemption from withholding if you are a Seller of California real estate.** Sellers of California real estate use Form 593-C, Real Estate Withholding Certificate, to claim an exemption from real estate withholding.

**The following are excluded from withholding and completing this form:**

- The United States and any of its agencies or instrumentalities.
- A state, a possession of the United States, the District of Columbia, or any of its political subdivisions or instrumentalities.
- A foreign government or any of its political subdivisions, agencies, or instrumentalities.

### B Income Subject to Withholding

California Revenue and Taxation Code (R&TC) Section 18662 requires withholding of income or franchise tax on payments of California source income made to nonresidents of California.

Withholding is required on the following, but is not limited to:

- Payments to nonresidents for services rendered in California.
- Distributions of California source income made to domestic nonresident partners, members, and S corporation shareholders and allocations of California source income made to foreign partners and members.
- Payments to nonresidents for rents if the payments are made in the course of the withholding agent's business.

- Payments to nonresidents for royalties from activities sourced to California.
- Distributions of California source income to nonresident beneficiaries from an estate or trust.
- Endorsement payments received for services performed in California.
- Prizes and winnings received by nonresidents for contests in California.

However, withholding is optional if the total payments of California source income are \$1,500 or less during the calendar year.

For more information on withholding get FTB Pub. 1017, Resident and Nonresident Withholding Guidelines. To get a withholding publication, see Additional Information.

### C Who Certifies this Form

Form 590 is certified by the payee. California residents or entities exempt from the withholding requirement should complete Form 590 and submit it to the withholding agent before payment is made. The withholding agent is then relieved of the withholding requirements if the agent relies in good faith on a completed and signed Form 590 unless notified by the Franchise Tax Board (FTB) that the form should not be relied upon.

An incomplete certificate is invalid and the withholding agent should not accept it. If the withholding agent receives an incomplete certificate, the withholding agent is required to withhold tax on payments made to the payee until a valid certificate is received. In lieu of a completed certificate on the preprinted form, the withholding agent may accept as a substitute certificate a letter from the payee explaining why the payee is not subject to withholding. The letter must contain all the information required on the certificate in similar language, including the under penalty of perjury statement and the payee's taxpayer identification number. The withholding agent must retain a copy of the certificate or substitute for at least four years after the last payment to which the certificate applies, and provide it upon request to the FTB.

For example, if an entertainer (or the entertainer's business entity) is paid for a performance, the entertainer's information must be provided. **Do not** submit the entertainer's agent or promoter information.

The grantor of a grantor trust shall be treated as the payee for withholding purposes. Therefore, if the payee is a grantor trust and one or more of the grantors is a nonresident, withholding is required. If all of the grantors on the trust are residents, no withholding is required. Resident grantors can check the box on Form 590 labeled "Individuals — Certification of Residency."

### D Definitions

For California non-wage withholding purposes, **nonresident** includes all of the following:

- Individuals who are not residents of California.
- Corporations not qualified through the California Secretary of State (CA SOS) to do business in California or having no permanent place of business in California.
- Partnerships or limited liability companies (LLCs) with no permanent place of business in California.
- Any trust without a resident grantor, beneficiary, or trustee, or estates where the decedent was not a California resident.

Foreign refers to non-U.S.

For more information about determining resident status, get FTB Pub. 1031, Guidelines for Determining Resident Status. Military servicemembers have special rules for residency. For more information, get FTB Pub. 1032, Tax Information for Military Personnel.

#### Permanent Place of Business:

A corporation has a permanent place of business in California if it is organized and existing under the laws of California or if it is a foreign corporation qualified to transact intrastate business by the CA SOS. A corporation that has not qualified to transact intrastate business (e.g., a corporation engaged exclusively in interstate commerce) will be considered as having a permanent place of business in California only if it maintains a permanent office in California that is permanently staffed by its employees.

### E Military Spouse Residency Relief Act (MSRRA)

Generally, for tax purposes you are considered to maintain your existing residence or domicile. If a military servicemember and nonmilitary spouse have the same state of domicile, the MSRRA provides:

- A spouse shall not be deemed to have lost a residence or domicile in any state solely by reason of being absent to be with the servicemember serving in compliance with military orders.
- A spouse shall not be deemed to have acquired a residence or domicile in any other state solely by reason of being there to be with the servicemember serving in compliance with military orders.

**Domicile** is defined as the one place:

- Where you maintain a true, fixed, and permanent home.
- To which you intend to return whenever you are absent.

A military servicemember's nonmilitary spouse is considered a nonresident for tax purposes if the servicemember and spouse have the same domicile outside of California and the spouse is in California solely to be with the servicemember who is serving in compliance with Permanent Change of Station orders.

California may require nonmilitary spouses of military servicemembers to provide proof that they meet the criteria for California personal income tax exemption as set forth in the MSRRA.

Income of a military servicemember's nonmilitary spouse for services performed in California is not California source income subject to state tax if the spouse is in California to be with the servicemember serving in compliance with military orders, and the servicemember and spouse have the same domicile in a state other than California.

For additional information or assistance in determining whether the applicant meets the MSRRA requirements, get FTB Pub. 1032.

## Specific Instructions

### Payee Instructions

Enter the withholding agent's name.

Enter the payee's information, including the taxpayer identification number (TIN) and check the appropriate TIN box.

You must provide an acceptable TIN as requested on this form. The following are acceptable TINs: social security number (SSN); individual taxpayer identification number (ITIN); federal employer identification number (FEIN); California corporation number (CA Corp no.); or CA SOS file number.

**Private Mail Box (PMB)** – Include the PMB in the address field. Write "PMB" first, then the box number. Example: 111 Main Street PMB 123.

**Foreign Address** – Enter the information in the following order: City, Country, Province/Region, and Postal Code. Follow the country's practice for entering the postal code. **Do not** abbreviate the country's name.

Check the box that reflects the reason why the payee is exempt from the California income tax withholding requirement.

### Withholding Agent Instructions

Keep Form 590 for your records. **Do not** send this form to the FTB unless it has been specifically requested.

For more information, contact Withholding Services and Compliance, see Additional Information.

The payee must notify the withholding agent if any of the following situations occur:

- The individual payee becomes a nonresident.
- The corporation ceases to have a permanent place of business in California or ceases to be qualified to do business in California.
- The partnership ceases to have a permanent place of business in California.
- The LLC ceases to have a permanent place of business in California.
- The tax-exempt entity loses its tax-exempt status.

If any of these situations occur, then withholding may be required. For more information, get Form 592, Resident and Nonresident Withholding Statement, Form 592-B, Resident and Nonresident Withholding Tax Statement, and Form 592-V, Payment Voucher for Resident and Nonresident Withholding.

## Additional Information

For additional information or to speak to a representative regarding this form, call the Withholding Services and Compliance telephone service at:

Telephone: **888.792.4900**  
916.845.4900  
Fax: 916.845.9512

OR write to:

WITHHOLDING SERVICES AND  
COMPLIANCE MS F182  
FRANCHISE TAX BOARD  
PO BOX 942867  
SACRAMENTO CA 94267-0651

You can download, view, and print California tax forms and publications at [ftb.ca.gov](http://ftb.ca.gov).

OR to get forms by mail write to:

TAX FORMS REQUEST UNIT  
FRANCHISE TAX BOARD  
PO BOX 307  
RANCHO CORDOVA CA 95741-0307

For all other questions unrelated to withholding or to access the TTY/TDD numbers, see the information below.

### Internet and Telephone Assistance

Website: [ftb.ca.gov](http://ftb.ca.gov)  
Telephone: 800.852.5711 from within the United States  
916.845.6500 from outside the United States

TTY/TDD: 800.822.6268 for persons with hearing or speech impairments

### Asistencia Por Internet y Teléfono

Sitio web: [ftb.ca.gov](http://ftb.ca.gov)  
Teléfono: 800.852.5711 dentro de los Estados Unidos  
916.845.6500 fuera de los Estados Unidos

TTY/TDD: 800.822.6268 para personas con discapacidades auditivas o del habla

## **Certification Regarding Debarment, Suspension, and Other Responsibility Matters**

The prospective participant certifies to the best of its knowledge and belief that it and the principals:

- (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency;
- (b) Have not within a three year period preceding this proposal been convicted of or had a civil judgement rendered against them or commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State, or local) transaction or contract under a public transaction: violation of Federal or State antitrust statute or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
- (c) Are not presently indicted for or otherwise criminally or civilly charged by a government entity (Federal, State, or local) with commission of any of the offenses enumerated in paragraph (b) of this certification; and
- (d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State, or local) terminated for cause or default.

I understand that a false statement on this certification may be grounds for rejection of this proposal or termination of the award. In addition, under 18 USC Sec. 1001, a false statement may result in a fine of up to \$10,000 or imprisonment for up to 5 years, or both.

---

Typed Name & Title of Authorized Representative

---

Signature of Authorized Representative Date

I am unable to certify to the above statements. My explanation is attached.

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EPA Form 5700-49 (11-88)





## CAMPAIGN CONTRIBUTIONS DISCLOSURE

In accordance with California law, bidders and contracting parties are required to disclose, at the time the application is filed, information relating to any campaign contributions made to South Coast Air Quality Management District (SCAQMD) Board Members or members/alternates of the MSRC, including: the name of the party making the contribution (which includes any parent, subsidiary or otherwise related business entity, as defined below), the amount of the contribution, and the date the contribution was made. 2 C.C.R. §18438.8(b).

California law prohibits a party, or an agent, from making campaign contributions to SCAQMD Governing Board Members or members/alternates of the Mobile Source Air Pollution Reduction Review Committee (MSRC) of more than \$250 while their contract or permit is pending before the SCAQMD; and further prohibits a campaign contribution from being made for three (3) months following the date of the final decision by the Governing Board or the MSRC on a donor's contract or permit. Gov't Code §84308(d). For purposes of reaching the \$250 limit, the campaign contributions of the bidder or contractor plus contributions by its parents, affiliates, and related companies of the contractor or bidder are added together. 2 C.C.R. §18438.5.

In addition, SCAQMD Board Members or members/alternates of the MSRC must abstain from voting on a contract or permit if they have received a campaign contribution from a party or participant to the proceeding, or agent, totaling more than \$250 in the 12-month period prior to the consideration of the item by the Governing Board or the MSRC. Gov't Code §84308(c).

The list of current SCAQMD Governing Board Members can be found at the SCAQMD website ([www.aqmd.gov](http://www.aqmd.gov)). The list of current MSRC members/alternates can be found at the MSRC website (<http://www.cleantransportationfunding.org>).

### **SECTION I.**

**Contractor (Legal Name):** \_\_\_\_\_

DBA, Name _____, County Filed in _____ Corporation, ID No. _____ LLC/LLP, ID No. _____
--

**List any parent, subsidiaries, or otherwise affiliated business entities of Contractor:**  
*(See definition below).*

\_\_\_\_\_  
\_\_\_\_\_

### **SECTION II.**

Has Contractor and/or any parent, subsidiary, or affiliated company, or agent thereof, made a campaign contribution(s) totaling \$250 or more in the aggregate to a current member of the South Coast Air Quality Management Governing Board or member/alternate of the MSRC in the 12 months preceding the date of execution of this disclosure?

Yes     No    **If YES, complete Section II below and then sign and date the form. If NO, sign and date below. Include this form with your submittal.**

**Campaign Contributions Disclosure, continued:**

Name of Contributor \_\_\_\_\_

\_\_\_\_\_  
Governing Board Member or MSRC Member/Alternate      Amount of Contribution      Date of Contribution

Name of Contributor \_\_\_\_\_

\_\_\_\_\_  
Governing Board Member or MSRC Member/Alternate      Amount of Contribution      Date of Contribution

Name of Contributor \_\_\_\_\_

\_\_\_\_\_  
Governing Board Member or MSRC Member/Alternate      Amount of Contribution      Date of Contribution

Name of Contributor \_\_\_\_\_

\_\_\_\_\_  
Governing Board Member or MSRC Member/Alternate      Amount of Contribution      Date of Contribution

**I declare the foregoing disclosures to be true and correct.**

By: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

**DEFINITIONS**

Parent, Subsidiary, or Otherwise Related Business Entity (2 Cal. Code of Regs., §18703.1(d).)

- (1) Parent subsidiary. A parent subsidiary relationship exists when one corporation directly or indirectly owns shares possessing more than 50 percent of the voting power of another corporation.
- (2) Otherwise related business entity. Business entities, including corporations, partnerships, joint ventures and any other organizations and enterprises operated for profit, which do not have a parent subsidiary relationship are otherwise related if any one of the following three tests is met:
  - (A) One business entity has a controlling ownership interest in the other business entity.
  - (B) There is shared management and control between the entities. In determining whether there is shared management and control, consideration should be given to the following factors:
    - (i) The same person or substantially the same person owns and manages the two entities;
    - (ii) There are common or commingled funds or assets;
    - (iii) The business entities share the use of the same offices or employees, or otherwise share activities, resources or personnel on a regular basis;
    - (iv) There is otherwise a regular and close working relationship between the entities; or
  - (C) A controlling owner (50% or greater interest as a shareholder or as a general partner) in one entity also is a controlling owner in the other entity.



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

## Direct Deposit Authorization

### STEP 1: Please check all the appropriate boxes

- |  |  |
|--|--|
| <input type="checkbox"/> Individual (Employee, Governing Board Member) | <input type="checkbox"/> New Request           |
| <input type="checkbox"/> Vendor/Contractor                             | <input type="checkbox"/> Cancel Direct Deposit |
| <input type="checkbox"/> Changed Information                           |  |

### STEP 2: Payee Information

Last Name		First Name		Middle Initial	Title
Vendor/Contractor Business Name (if applicable)					
Address				Apartment or P.O. Box Number	
City		State	Zip	Country	
Taxpayer ID Number		Telephone Number		Email Address	

### Authorization

- I authorize South Coast Air Quality Management District (SCAQMD) to direct deposit funds to my account in the financial institution as indicated below. I understand that the authorization may be rejected or discontinued by SCAQMD at any time. If any of the above information changes, I will promptly complete a new authorization agreement. If the direct deposit is not stopped before closing an account, funds payable to me will be returned to SCAQMD for distribution. This will delay my payment.
- This authorization remains in effect until SCAQMD receives written notification of changes or cancellation from you.
- I hereby release and hold harmless SCAQMD for any claims or liability to pay for any losses or costs related to insufficient fund transactions that result from failure within the Automated Clearing House network to correctly and timely deposit monies into my account.

### STEP 3:

You must verify that your bank is a member of an Automated Clearing House (ACH). Failure to do so could delay the processing of your payment. You must attach a voided check or have your bank complete the bank information and the account holder must sign below.

### To be Completed by your Bank

<b>Staple Voided Check Here</b>	Name of Bank/Institution				
	Account Holder Name(s)				
	<input type="checkbox"/> Saving <input type="checkbox"/> Checking		Account Number	Routing Number	
	Bank Representative Printed Name		Bank Representative Signature		Date
	ACCOUNT HOLDER SIGNATURE:				Date

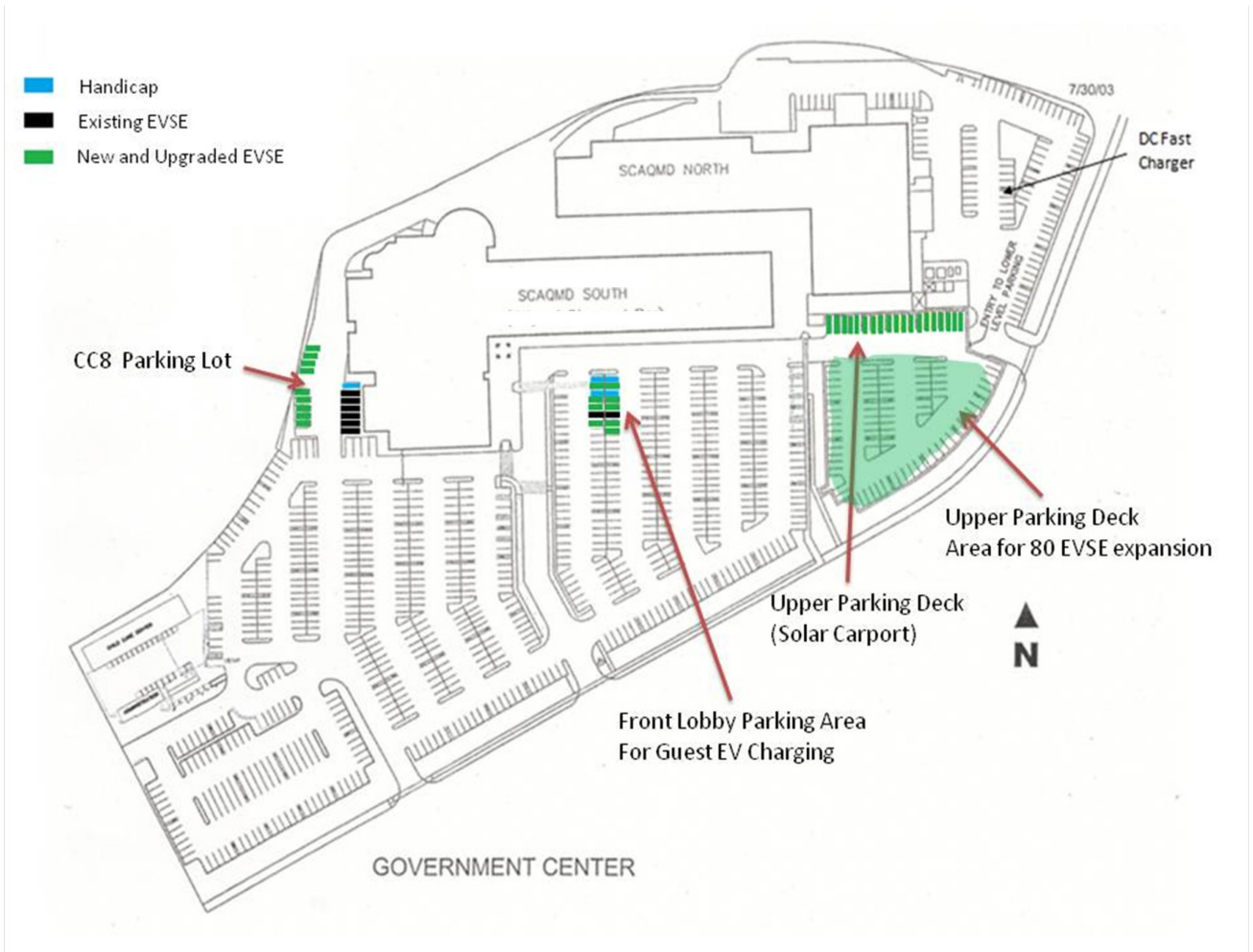
For SCAQMD Use Only

Input By \_\_\_\_\_

Date \_\_\_\_\_

# ATTACHMENT B

## SCAQMD HEADQUARTERS EV CHARGING SITE PLAN



## **ATTACHMENT C**

### **Construction Plans and Line Drawings from Engineering Firm**

(click on the link below to see the full construction plans and line drawings)

[http://www.aqmd.gov/docs/default-source/bids/rfp-p2016-01\\_scaqmd\\_evse\\_construction\\_plans.pdf](http://www.aqmd.gov/docs/default-source/bids/rfp-p2016-01_scaqmd_evse_construction_plans.pdf)

BOARD MEETING DATE: September 4, 2015

AGENDA NO. 4

**PROPOSAL:** Execute Contracts for FY 2013-14 “Year 16” Carl Moyer Multidistrict Program and Transfer Funds for Multidistrict Truck Projects under Voucher Incentive Program

**SYNOPSIS:** On May 6, 2015, proposals were received in response to the Program Announcement issued for the “Year 16” Carl Moyer Multidistrict Program. These actions are to: 1) execute contracts in an amount not to exceed \$1,380,560 from the Carl Moyer Program SB 1107 Multidistrict Fund (32); and 2) transfer \$1,469,440 from the Carl Moyer Program SB 1107 Multidistrict Fund (32) to the Voucher Incentive Program Fund (59) to fund multidistrict truck replacement projects on a first come, first served basis.

**COMMITTEE:** Technology, July 24, 2015; Recommended for Approval

**RECOMMENDED ACTIONS:**

1. Authorize the Chairman to execute the following Carl Moyer Program contracts with funds from the Carl Moyer Program SB 1107 Multidistrict Fund (32) for a total of up to \$1,380,560:
  - a. Double D Pipeline, Inc., for the replacement of 3 off-road vehicles in an amount not to exceed \$178,047;
  - b. Sukut Equipment, Inc., for the replacement of 2 and repower of 1 off-road vehicles in an amount not to exceed \$600,340; and
  - c. C.A. Rasmussen, Inc., for the replacement of 1 and repower of 3 off-road vehicles in an amount not to exceed \$602,173.
2. Approve the transfer of \$1,469,440 from the Carl Moyer Program SB 1107 Multidistrict Fund (32) to the Voucher Incentive Program (VIP) Fund (59) to fund multidistrict truck replacement projects under the Carl Moyer VIP on a first come, first served basis.

Barry R. Wallerstein, D.Env.  
Executive Officer

## **Background**

On April 3, 2015, the Board adopted a Resolution recognizing \$3 million in Carl Moyer Multidistrict Program grant awards and approved the release of a Program Announcement for the “Year 16” Carl Moyer Multidistrict Program. On May 6, 2015, a total of three proposals were received in response to the Program Announcement requesting \$1,380,560 in funding.

Under the SCAQMD’s Voucher Incentive Program (VIP), more than 930 trucks have been replaced with funding of over \$30 million from the Carl Moyer SB 1107 Multidistrict, SB 1107 and AB 923 funds. Due to increased demand, additional funds are needed to continue this successful program.

## **Outreach**

In accordance with SCAQMD’s Procurement Policy and Procedure, a public notice advertising the PA and inviting bids was published in the Los Angeles Times, the Orange County Register, the San Bernardino Sun, and Riverside County’s Press Enterprise newspapers to leverage the most cost-effective method of outreach to the South Coast Basin.

Additionally, potential bidders may have been notified utilizing SCAQMD’s own electronic listing of certified minority vendors. Notice of the PA has been emailed to the Black and Latino Legislative Caucuses and various minority chambers of commerce and business associations, and placed on the Internet at SCAQMD’s website (<http://www.AQMD.gov>).

## **Proposal**

This action is to approve the execution of three contracts for a total amount not to exceed \$1,380,560 from the Carl Moyer Program SB 1107 Multidistrict Fund (32) as follows: 1) Double D Pipeline for the replacement of three off-road vehicles; 2) Sukut Equipment, Inc., for replacement of two and repower of one off-road vehicles; and 3) C.A. Rasmussen, Inc., for the replacement of one and repower of three off-road vehicles. Applications for these projects were submitted under the “Year 16” Carl Moyer Multidistrict Program solicitation, and staff has completed the evaluation of these projects in cooperation with the applicants. Total annual NOx and PM reductions from these three Carl Moyer projects are approximately 12.9 tons and 0.3 tons, respectively.

This action is to also approve the transfer of up to \$1,469,440 from the Carl Moyer Program SB 1107 Multidistrict Fund (32) to the VIP Fund (59) to fund multidistrict truck replacement projects under the Carl Moyer VIP on a first come, first served basis.

**Benefits to SCAQMD**

The successful implementation of the Carl Moyer Multidistrict Program will provide direct emissions reductions for both NO<sub>x</sub> and PM as required by the Program. Since the vehicles funded under this Program will operate for many years, the emissions reductions will provide long-term benefits.

**Resource Impacts**

Funding for the Carl Moyer Multidistrict Program shall not exceed \$2,850,000 from the Carl Moyer Multidistrict Program Fund (32), which includes \$1,380,560 for three contracts for the replacement of 6 and repower of 4 off-road vehicles and \$1,469,440 in funds to be transferred from the Carl Moyer Multidistrict Program SB 1107 Fund (32) to the VIP Fund (59) to fund multidistrict truck replacement projects on a first come, first served basis.



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BOARD MEETING DATE: September 4, 2015

AGENDA NO. 5

**PROPOSAL:** Execute Contracts to Cosponsor Sustainable Transportation Energy Pathways 2015-2018 Program 

**SYNOPSIS:** The Sustainable Transportation Energy Pathways (STEPS) Program at the U.C. Davis Institute of Transportation Studies is continuing their multidisciplinary research consortium that brings together the world's leading automotive manufacturers, energy companies and government agencies to understand sustainable vehicle and energy solutions and requests continued funding for 2015 through 2018. This action is to execute a contract with U.C. Davis to cosponsor the STEPS 2015-2018 Program in an amount not to exceed \$240,000 from the Clean Fuels Fund (31).

**COMMITTEE:** Technology, July 24, 2015; Recommended for Approval

**RECOMMENDED ACTION:**

Authorize the Chairman to execute a contract with the U.C. Davis Institute of Transportation Studies to support the STEPS 2015-2018 Program in an amount not to exceed \$240,000 from the Clean Fuels Fund (31).

Barry R. Wallerstein, D.Env.  
Executive Officer

MMM:FM:LHM:mg

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**Background**

On October 5, 2012, the Board approved the allocation of \$120,000 from the Clean Fuels Fund (31) to cosponsor the 2011-2014 Next Sustainable Transportation Energy Pathways (STEPS) Program for 2013 and 2014. NextSTEPS was a four-year multidisciplinary research consortium, part of the U.C. Davis Institute of Transportation Studies (ITS-Davis). ITS-Davis is continuing their multidisciplinary research consortium that brings together the world's leading automotive manufacturers, energy companies and government agencies to seek to illuminate the critical factors and

dynamics necessary to transition to a sustainable transportation system by means of exploring the difficult technical, economic and behavioral questions required to inform industry planning and government policy. Through this research, STEPS aims to create transparent, realistic scenarios and transition analyses, which are disseminated to decision-makers through workshops, seminars, working papers, presentations and publications. Program areas continue to include, but are not limited to, consumer behavior, infrastructure system analysis, environmental impact, vehicle technology evaluation and integrative scenarios will be compared and analyzed with reference to the four energy pathways (hydrogen, biofuels, electricity and fossil fuels) best suited to the transportation sector.

Numerous research projects pertaining to the advancement of alternative fuel technology were completed during NextSTEPS. STEPS 2015-2018 will focus primarily on expediting and expanding the implementation of advanced technology and modeling infrastructure formats in a cost-effective manner.

### **Proposal**

ITS-Davis has requested that SCAQMD join STEPS as a Program Sponsor for 2015-2018 in order to provide feedback on draft reports and attend high-level, invitation-only conferences and research workshops. The four explicit program goals of the STEPS 2015-2018 Program are to: 1) optimize scenarios for mass transition to alternative fuels and vehicles in California, 2) model evolving relationships between future sources of mobile energy and the existing oil and gas industry, 3) describe current trends and inform policymakers of strategies for Global Urban Sustainable Transport, and 4) continue development of a wide range of models in order to progress research and improve trend recognition. This action is to execute a contract with ITS-Davis to support the STEPS 2015-2018 Program.

### **Benefits to SCAQMD**

The STEPS Program has a direct relevance to SCAQMD's priorities in evaluating changes to criteria emission levels and vehicle technology options. Outreach resulting from the STEPS 2015-2018 Program will broaden the public knowledge base and help expedite introduction of near-zero and zero-emitting vehicles in the South Coast Air Basin, identified as a key strategy for the attainment of the ozone standard. SCAQMD will receive access to member-exclusive workshops, a member-specific interaction plan, access to preliminary research and a seat on the STEPS advisory board. This proposed project is included in the *Technology Advancement Office 2015 Plan Update* under the category of "Assessment and Technical Support of Advanced Technologies and Information Dissemination."

### **Sole Source Justification**

Section VIII.B.2. of the Procurement Policy and Procedure identifies four major provisions under which a sole source award may be justified. These requests for sole

source awards are made under provision B.2.d.: Other circumstances exist which in the determination of the Executive Officer require such waiver in the best interest of the SCAQMD. Specifically, these circumstances are B.2.d.(1): Project involving cost sharing by multiple sponsors and B.2.d.(8): Research and development efforts with educational institutions or nonprofit organizations.

U.C. Davis is an educational institution and their Institute for Transportation Studies is internationally recognized for its multidisciplinary approach to transportation studies. Over the past 15 years, ITS-Davis has built strong research programs in environmental vehicle technologies and fuels, climate change, air quality, and other environmental impacts, and travel behavior and transport system modeling. Research conducted by U.C. Davis has the potential for far-reaching policy implications.

**Resource Impacts**

Participation in the ITS-Davis STEPS 2015-2018 Program at the Program Sponsor level has been set at \$60,000 annually. SCAQMD’s cost-share will not exceed \$240,000 from the Clean Fuels Fund (31). Over \$5 million in cost sharing so far has been committed by energy companies (Aramco, BP, Chevron, Center for High Technology - India, Shell, Sinopec and Sempra), automotive manufacturers (BMW, Chrysler, Daimler, Ford, General Motors, Honda, Nissan, Renault, Toyota and Volkswagen), and government agencies (CARB, CEC, Caltrans, U.S. DOE and U.S. DOT). The funding amounts from various cosponsors are listed in the table below:

STEPS 2015-2018 Program Sponsors

<b>Organizations</b>	<b>Funding</b>	<b>Percent</b>
7 Energy Companies	\$1,680,000	31%
10 Automotive Companies	\$2,400,000	43%
5 Government Agencies	\$1,200,000	22%
SCAQMD ( <i>requested</i> )	\$240,000	4%
Total	\$5,520,000	100%

Sufficient funds are available for the proposed projects from the Clean Fuels Fund (31), established as a special revenue fund resulting from the state-mandated Clean Fuels Program. The Clean Fuels Program, under Health and Safety Code Sections 40448.5 and 40512 and Vehicle Code Section 9250.11, establishes mechanisms to collect revenues from mobile sources to support projects to increase the utilization of clean fuels, including the development of the necessary advanced enabling technologies. Funds collected from motor vehicles are restricted, by statute, to be used for projects and program activities related to mobile sources that support the objectives of the Clean Fuels Program.

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BOARD MEETING DATE: September 4, 2015

AGENDA NO. 6

PROPOSAL: Establish Residential EV Charging Incentive Pilot Program 

SYNOPSIS: An incentive program for residential EV charging will assist in accelerating deployment of PEVs. This action is to establish a residential EV charging incentive pilot program and authorize the Executive Officer to issue rebates to program participants in an amount not to exceed \$500,000 from the Clean Fuels Fund (31).

COMMITTEE: Technology, July 24, 2015; Recommended for Approval

**RECOMMENDED ACTION:**

Establish a residential EV charging incentive pilot program and authorize the Executive Officer to issue rebates under the terms of the program for purchase of Level 2 chargers in an amount not to exceed \$500,000 from the Clean Fuels Fund (31).

Barry R. Wallerstein, D.Env.  
Executive Officer

MMM:FM:AK:PSK:AN

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**Background**

The Governor's ZEV Action Plan has set a goal of establishing infrastructure to support one million clean vehicles by 2020 and having 1.5 million clean vehicles on the road by 2025. In the past five years, over 41,000 Clean Vehicle Rebate Program (CVRP) incentives for plug-in electric vehicles (PEVs) have been issued for the South Coast Air Basin, which is approximately 42% of rebates issued statewide. The rapid growth in the number of PEVs purchased and the announcement of longer range (larger battery) PEVs highlights the greater need for residential charging. To help meet the goals set forth in the ZEV Action Plan, further incentives for PEV infrastructure are needed.

**Proposal**

This action is to establish a residential EV charging incentive pilot program to offset Level 2 EV supply equipment hardware costs. This program will serve residents within

the SCAQMD jurisdiction and provide an additional incentive for low-income residents. The program will be implemented on a first come, first served basis and will cover up to \$250 for the cost of hardware for Level 2 residential chargers. An additional incentive of up to \$250 will be available for low-income residents to further assist with EV hardware costs. Interested program participants will be required to complete and submit an application for the rebate along with documentation verifying eligibility requirements which, in part, will include proof of DMV registration of a PEV at the residential address, income qualification documentation (e.g. tax returns or low-income utility qualification), and proof of purchase/installation. Participants will also have to agree to a three-year commitment to use the EV hardware under this Program as well as a site inspection. Staff will coordinate with local utility residential EV charging incentive programs to avoid having residents receive multiple incentives.

### **Benefits to SCAQMD**

This project will accelerate deployment of PEVs and associated infrastructure to residents who are not early adopters of these technologies and might not otherwise purchase these vehicles, further reducing vehicle emissions. The scope of this project is identified as a technical priority in the *Technology Advancement Office Clean Fuels Program 2015 Plan Update* under “Electric/Hybrid Technologies & Infrastructure” and within the SCAQMD’s *Goals and Priority Objectives for FY 2015-16* under “Incentive Funding Programs.”

### **Resource Impacts**

Total funding for this Program shall not exceed \$500,000 from the Clean Fuels Fund (31), with rebates ranging from \$250 to \$500, depending on income level.

Sufficient funds are available from the Clean Fuels Fund (31), established as a special revenue fund resulting from the state-mandated Clean Fuels Program. The Clean Fuels Program, under Health and Safety Code Sections 40448.5 and 40512 and Vehicle Code Section 9250.11, establishes mechanisms to collect revenues from mobile sources to support projects to increase the utilization of clean fuels, including the development of the necessary advanced enabling technologies. Funds collected from motor vehicles are restricted, by statute, to be used for projects and program activities related to mobile sources that support the objectives of the Clean Fuels Program.

BOARD MEETING DATE: September 4, 2015

AGENDA NO. 7

**PROPOSAL:** Recognize Revenue and Appropriate Funds for AB 1318 Weatherization Projects

**SYNOPSIS:** To enhance the SCAQMD's AB 1318 Weatherization Program and reach more homes, SCAQMD has applied for residential rebates from the Southern California Gas Company (SoCalGas) and the Energy Upgrade California (EUC) initiative for additional installation of attic insulation in eligible homes. Staff anticipates receiving up to \$50,000 each from SoCalGas and EUC. This action is to recognize up to \$100,000 in the AB 1318 Mitigation Fees Fund (58).

**COMMITTEE:** Administrative, July 17, 2015; Less than a quorum was present; the Committee Members concurred that this item be approved by the Board.

**RECOMMENDED ACTIONS:**

- 1.) Recognize upon receipt up to \$50,000 from SoCalGas and up to \$50,000 from EUC into the AB 1318 Mitigation Fees Fund (58) to insulate more properties through the AB 1318 Weatherization Program, and
- 2.) Authorize the Executive Officer to amend the existing contract with Quality Interiors in an amount up to \$100,000 for the AB 1318 Weatherization Program.

Barry R. Wallerstein, D.Env.  
Executive Officer

MM:FM:CD

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**Background**

On January 4, 2013, the Board approved awards for emission reduction projects in the Coachella Valley with mitigation fees from the CPV Sentinel Project provided pursuant to the requirements of AB 1318. A total of \$50,923,275 was allocated to 26 projects, and one of the projects approved was for weatherization. Through this program, properties located in the Coachella Valley achieved improved insulation and reduced energy use.

The Southern California Gas Company (SoCalGas) currently administers a Residential Rebate Program that offers cash rebates to eligible single-family residential customers for installing attic insulation and other energy saving measures meeting certain specifications.

Energy Upgrade California (EUC) is a state initiative to save energy, conserve natural resources and help reduce demand on the electrical grid. EUC offers cash rebates to eligible customers for installing energy-saving measures that meet their specifications.

The SCAQMD weatherization program has been one of the most successful weatherization programs in the State. In the fall of 2014, SCE requested that SCAQMD partner with them in their EUC program. Since that time, staff has been working with SCE to develop a process where SCAQMD funds could be leveraged with both EUC and SoCalGas funds to further reduce energy usage and improve air quality.

### **Proposal**

To enhance the SCAQMD's AB 1318 Weatherization Program and reach more homes, SCAQMD has worked with SoCalGas and EUC to leverage incentive and rebate funding for residential weatherization projects. This proposal is to recognize funding from SoCalGas and EUC. These funds would be reimbursed to the SCAQMD for partial costs incurred in the installation of attic insulations under the AB 1318 Program. Funding reimbursement would be dependent on the specific work done at individual homes, and could be up to \$2,000 per qualifying property. Rebate revenues, combined with the AB 1318 funds, will result in the successful implementation of the three agency programs and increase the number of homes weatherized.

All work will be done by SCAQMD's contractor, Quality Interior, under the current AB 1318 contract. As this contract calls for most of the same type of upgrades, (insulation, air seal and weather stripping), being done under the current contract leveraging funding will allow for a greater number of homes to be insulated, thus reducing energy consumption and improving air quality.

### **Benefits to SCAQMD**

The AB 1318 Mitigation Fees Fund (58) was established by the transfer of funds for certified emission offsets. These funds along with rebate revenues from SoCalGas and EUC will be used to implement emission reduction weatherization services in the Coachella Valley that will have a direct impact on air quality and the health of residents, while aiding the region's energy conservation goals.

### **Resource Impacts**

Up to \$100,000 (\$50,000 each from SoCalGas and EUC) shall be recognized into the AB 1318 Mitigation Fees Fund (58) to increase the number of homes being weatherized under the AB 1318 Weatherization Program.

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BOARD MEETING DATE: September 4, 2015

AGENDA NO. 8

PROPOSAL: Execute Contract for Tier 4 Passenger Locomotives

SYNOPSIS: At its February 1, 2013, and February 7, 2014 meetings, the Board approved awards to the Southern California Regional Rail Authority (SCRRA) in the amount of \$52 million for the replacement of 20 passenger locomotives with new Tier 4 locomotives over a four-year period. Under the “Year 16” Carl Moyer Program Announcement, SCRRA submitted a new proposal requesting \$58.85 million for the replacement of an additional 17 and the purchase of 3 new Tier 4 passenger locomotives. Staff has completed the evaluation of the project and confirmed its eligibility with CARB staff. This action is to execute a contract with SCRRA in an amount not to exceed \$22.85 million from the Carl Moyer Program AB 923 Fund (80). The remaining \$36 million requested by SCRRA will be considered over four phases in future Board requests.

COMMITTEE: Special Technology, August 14, 2015; Recommended for Approval

**RECOMMENDED ACTION:**

Authorize the Chairman to execute a contract with SCRRA to cofund the replacement of 10 and, subject to CARB approval, the purchase of 1 new Tier 4 passenger locomotives, contingent upon a total of 17 locomotive replacements and 3 new purchases for the entire project, in an amount not to exceed \$22.85 million (inclusive of up to \$7 million from accrued interest) from the Carl Moyer Program AB 923 Fund (80). The remaining \$36 million of the requested funds will be considered over four phases in future Board requests.

Barry R. Wallerstein, D.Env.  
Executive Officer

MMM:FM

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## **Background**

At its February 1, 2013, and February 7, 2014 meetings, the Board approved awards to the Southern California Regional Rail Authority (SCRRA) in the amount of \$52 million for the replacement of 20 passenger locomotives with Tier 4 locomotives over a four-year period. Since the execution of the contract, staff has held quarterly meetings with SCRRA and has closely monitored the progress of the project. To date, all the milestones of the project have been met and the first two locomotives are scheduled for delivery in December of this year.

The “Year 16” Carl Moyer Program Announcement was released on March 7, 2014, and SCRRA submitted a new proposal requesting \$58.85 million for the replacement of an additional 17 and the purchase of 3 new Tier 4 passenger locomotives.

## **Outreach**

In accordance with SCAQMD’s Procurement Policy and Procedure, a public notice advertising the PA and inviting bids was published in the Los Angeles Times, the Orange County Register, the San Bernardino Sun, and Riverside County’s Press Enterprise newspapers to leverage the most cost-effective method of outreach to the South Coast Basin.

Additionally, potential bidders may have been notified utilizing SCAQMD’s own electronic listing of certified minority vendors. Notice of the PA has been emailed to the Black and Latino Legislative Caucuses and various minority chambers of commerce and business associations, and placed on the Internet at SCAQMD’s website (<http://www.aqmd.gov>).

## **Proposal**

This action is to execute a contract with SCRRA to cofund the replacement of 10 and, subject to CARB approval, the purchase of 1 new Tier 4 passenger locomotives, contingent upon a total of 17 locomotive replacements and 3 new purchases for the entire project, in an amount not to exceed \$22.85 million from the Carl Moyer Program AB 923 Fund (80). Up to \$7 million of these funds will be from AB 923 accrued interest funds. The remaining \$36 million of the requested funds will be considered over four phases in future Board requests. Staff will ask for Board approval each time to amend the existing contract for the addition of the funds.

The total project cost of \$129 million will be cost-shared by Caltrans and Metrolink member agencies with 31.9% and 22.5%, respectively. In compliance with the Carl Moyer Program requirements, the SCAQMD funds will be used only to fund 11 locomotives because they cannot be comingled with Caltrans funds. However, SCAQMD’s participation will be contingent upon implementation of all 20 locomotives.

The SCRRA application was evaluated according to CARB’s Carl Moyer Program Guidelines, and the requested funding amount is within the cost-effectiveness limit of the Program. In addition, based on the location of the rail tracks, 53% of the locomotive operations will be in disproportionately impacted areas as defined under SCAQMD’s Carl Moyer Program criteria.

**Benefits to SCAQMD**

The replacement of older diesel locomotives with new Tier 4 locomotives will help the South Coast Air Basin meet federal air quality standards. The procurement of Tier 4 locomotives has been identified in the recent U.S. EPA-approved 2007 8-hour Ozone SIP for the South Coast Air Basin. In addition, SCRRA locomotives travel throughout the South Coast Air Basin. As such, the cleaner Tier 4 locomotives will result in reduced exposure to diesel particulate emissions. Specifically, emissions reductions from NOx, PM and ROG from each locomotive will be around 12.3 tons/year, 0.33 ton/year, and 1.0 ton/year, respectively.

**Resource Impacts**

Funding for SCRRA’s locomotive project shall not exceed \$22.85 million from the Carl Moyer Program AB 923 Fund (80), of which up to \$7 million will be from accrued AB 923 interest funds. The remaining \$36 million of the SCRRA-requested funding will be recommended for consideration over four phases in future Board requests.

**Table 1: Summary of Metrolink Project for 20 Tier 4 Locomotives**

<b>Replacement or Expansion</b>	<b>No. of Locomotives</b>	<b>Current Tier to Tier 4</b>	<b>Caltrans Cofunding</b>	<b>Members Cofunding</b>	<b>SCAQMD Cofunding</b>	<b>Total</b>
Replacement	10	0	0	\$12.1M	\$58.85M	\$70.95M
Expansion	1	–				
Replacement	7	2	\$41.18M	\$16.87M	0	\$58.05M
Expansion	2	–				
<b>Total</b>	<b>20</b>		<b>\$41.18M</b>	<b>\$28.97M</b>	<b>\$58.85M</b>	<b>\$129M</b>
<b>% Share</b>			<b>31.9%</b>	<b>22.5%</b>	<b>45.6%</b>	

BOARD MEETING DATE: September 4, 2015

AGENDA NO. 9

PROPOSAL: Execute Contract for CEQA Consultant Assistance

SYNOPSIS: At its May 1, 2015 meeting, the Board approved the release of an RFP to secure assistance with preparing the Program Environmental Impact Report for the 2016 Air Quality Management Plan and other tasks necessary for complying with the California Environmental Quality Act. Four proposals were received and reviewed by a qualified panel. Two proposals scored above the minimum number of points required for technical merit and were further evaluated and scored according to costs necessary to prepare the Program Environmental Impact Report. This action is to award a time and materials contract to Environmental Audit Inc. for an amount not to exceed \$125,000. Funds for this contract are included in the FY 2015-16 Budget.

COMMITTEE: Administrative, July 17, 2015; Less than a quorum was present; the Committee Members concurred that this item be approved by the Board.

**RECOMMENDED ACTION:**

Authorize the Chairman to execute a contract with Environmental Audit Inc. for an amount not to exceed \$125,000, valid for a period of up to two years, with an option to extend up to another two years, to assist with preparation of the Program Environmental Impact Report for the 2016 Air Quality Management Plan and other CEQA-related tasks.

Barry R. Wallerstein, D.Env.  
Executive Officer

PF:JW:IM:BR

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**Background**

Pursuant to the Public Resources Code and California Code of Regulations, the California Environmental Quality Act (CEQA) applies to projects undertaken by, funded by, or requiring discretionary approval from public agencies. Consequently, CEQA analyses, documents, or notices are required for most SCAQMD rules, regulations, or plans prior to their adoption or modification by the Board. In connection

with preparing past Air Quality Management Plans (AQMPs), the SCAQMD, as the lead agency under CEQA, has typically prepared Program Environmental Impact Reports (EIRs) pursuant to CEQA Guidelines §15168. Program EIRs address discretionary actions that may affect many subsequent projects, such as the implementation of the multiple control measures that make up an AQMP.

Moreover, Public Resources Code §21082.1 allows public agencies to contract with consultants to prepare or assist with preparing CEQA documents. The public agency must retain independent review of all documents prepared by consultants. At its May 1, 2015 Board meeting, the Board authorized release of RFP #P2015-29 to solicit proposals to augment current staff resources to assist with preparing the 2016 AQMP Program EIR and other CEQA-related tasks as necessary and as funding allows. Total amount of funding available for this RFP is \$125,000. To augment current staff resources to prepare the Program EIR for the 2016 AQMP and other CEQA-related tasks, staff recommends securing the services of one qualified consultant.

### **Proposals**

Four proposals were received by the June 2, 2015 closing date of the RFP solicitation. All four proposals were first evaluated according to the technical proposal. To advance in the scoring process and be awarded points for cost, as indicated in the RFP, a proposal must be awarded a minimum score of 56 out of 70 points for technical merit, which is the standard minimum score used in the past for scoring similar types of CEQA consultant assistance proposals. The technical proposals were evaluated according to the criteria specified in the RFP, including the consultants' experience preparing CEQA documents; knowledge of CEQA case law; technical expertise performing air quality modeling analyses; knowledge of mobile and stationary source air pollution control technologies; experience preparing energy analyses; and organization of the proposal and writing skills.

The technical proposals from two of the four consultants exceeded the minimum number of points for technical merit, while the other two technical proposals were below the minimum number of points for technical merit and were disqualified (see Attachment A). Of the two qualifying proposals, the evaluation panel rated Environmental Audit Inc. the highest final average score of 105.6 points. This score was based on their understanding of the nature and extent of the work to be performed, their knowledge of CEQA and CEQA case law, and their experience preparing CEQA documents for complex public and private projects. In addition, this consultant has past experience preparing CEQA documents for clean air plans prepared by the SCAQMD, Bay Area Air Quality Management District, and the Sacramento Metropolitan Air Quality Management District.

The cost proposal for preparing the Program EIR for the 2016 AQMP submitted by Environmental Audit Inc. was \$118,900, which was within the amount of funding available for this RFP. The cost proposal submitted by PlaceWorks was \$109,007, which was lower than the other bidder's cost proposal. Consequently, PlaceWorks was

awarded the full cost score of 30 points, while the remaining bidder received a prorated cost score, using the methodology described in the RFP. Environmental Audit Inc. also received additional points for being qualified as a small business and a local business, and, therefore, was awarded an additional 15 points. The scores are summarized in Attachment A.

It is proposed that SCAQMD select the highest overall scoring proposal and contract with Environmental Audit Inc., to assist staff primarily with preparing the 2016 AQMP Program EIR, including responding to comments received on the Draft 2016 AQMP Program EIR, for an amount not to exceed \$125,000. Proposed contracts would be valid for up to two years with an option to extend up to another two years.

### **Outreach**

In accordance with SCAQMD's Procurement Policy and Procedure, a public notice advertising the RFP and inviting bids was published in the Los Angeles Times, the Orange County Register, the San Bernardino Sun, and Riverside County's Press Enterprise newspapers to leverage the most cost-effective method of outreach to the entire South Coast Basin.

Additionally, potential bidders may have been notified utilizing SCAQMD's own electronic listing of certified minority vendors. Notice of the RFP was emailed to the Black and Latino Legislative Caucuses and various minority chambers of commerce and business associations, and placed on the Internet at SCAQMD's website (<http://www.aqmd.gov>). In addition, notices of availability of the RFP were emailed to a list of CEQA consultants maintained by SCAQMD staff.

### **Bid Evaluation**

Four proposals were received and evaluated in accordance with the criteria in the RFP. Proposals received were evaluated by a diverse panel of technically qualified individuals according to the criteria described in the RFP. The evaluation panel consisted of one Planning and Rules Manager, and two Planning and Rules Program Supervisors. The panel breakdown was one Asian/Pacific Islander, two Caucasian; two female, and one male. Attachment A provides a summary of the proposals received, ranked by the scores from the evaluation panel. Two bids met the minimum technical standards and one is being recommended for funding.

### **Resource Impacts**

Funds for this contract in an amount not to exceed \$125,000 are included in the Planning, Rule Development and Area Sources FY 2015-16 Budget.

### **Attachment**

Evaluation of Proposals for RFP #P2015-29

**Attachment**

**EVALUATION OF PROPOSALS FOR RFP #P2015-29**

<b>Proposer</b>	<b>Average Technical Points<sup>2</sup></b>	<b>Cost Points</b>	<b>Potential Additional Points<sup>1</sup></b>					<b>Off-Peak Hrs Delivery Business</b>	<b>Final Score</b>
			<b>Small Business</b>	<b>DVBE Business</b>	<b>Use of DVBE Sub-contractor</b>	<b>Low Emission Vehicle Business</b>	<b>Local Business</b>		
Ascent Environmental	54.3	--	--	--	--	--	--	--	--
Environmental Audit, Inc.	63.3	27.3	10	0	0	0	5	0 <sup>3</sup>	105.6
PlaceWorks	58.7	30	0	0	0	0	5	0	93.7
Marine Research Specialists	51.0	--	--	--	--	--	--	--	--

<sup>1</sup> A maximum of 15 additional points may be earned for any combination of categories under this header.

<sup>2</sup> A minimum technical score of 56 points is needed in order to proceed to the cost evaluation step.

<sup>3</sup> This proposer qualified as an off-peak hours delivery business, but because the proposer already received a maximum additional 15 points from the small business and local business categories; thus, additional points for off-peak hours delivery were not included in the final score.

BOARD MEETING DATE: September 4, 2015

AGENDA NO. 10

PROPOSAL: Replace Cleveland Range Food Steamer in Cafeteria

SYNOPSIS: The current cafeteria Cleveland Range pressureless convection steamer used for food preparation is over 23 years old. This equipment is at the end of its life cycle and beyond repair. This action is to approve the purchase of a new Cleveland Range pressureless convection steamer in an amount not to exceed \$18,903. Funding for this purchase is available in the Infrastructure Improvement Fund (02).

COMMITTEE: Special Administrative, August 14, 2015; Recommended for Approval

**RECOMMENDED ACTION:**

Authorize the Procurement Manager to execute a purchase order with Action Sales at a not-to-exceed amount of \$18,903, for the purchase and installation of a new Cleveland Range pressureless convection steamer at SCAQMD's Diamond Bar headquarters Cafeteria.

Barry R. Wallerstein, D.Env.  
Executive Officer

WJJ:BJ

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**Background**

During the construction of SCAQMD's headquarters, two Cleveland Range convection steamers were installed in the cafeteria for food preparation. As the equipment started to age and deteriorate, staff started using parts from one of the steamers to keep the other one running. Replacement parts from the second unit have now been depleted, and it is not cost effective to continue ordering new parts for outdated equipment.

**Proposal**

This action is to authorize the Procurement Manager to execute a purchase order not to exceed \$18,903 with highest-ranked bidder Action Sales for the purchase of

a new Cleveland Range pressureless convection steamer at SCAQMD's Diamond Bar Cafeteria.

**Outreach**

In accordance with Section IV.B.2 of the SCAQMD Procurement Policy and Procedure, staff solicited informal bids from qualified suppliers of Cleveland Range steamers. Three responsive bids were received and evaluated. Action Sales of the City of Industry was determined to be the lowest responsive bidder and was selected for award at a not-to-exceed price of \$18,903.

**Resource Impacts**

Funding for this purchase is available in the Infrastructure Improvement Fund (02).



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BOARD MEETING DATE: September 4, 2015

AGENDA NO. 11

**PROPOSAL:** Authorize Purchase of Audio-Visual System Upgrades in the Hearing Board and GB Rooms

**SYNOPSIS:** On April 3, 2015, the Board approved release of an RFP to select a vendor capable of upgrading SCAQMD's audio-visual systems in the Hearing Board and GB rooms at the Diamond Bar headquarters. Due to the audio-visual limitations in both rooms, SCAQMD is seeking a contractor capable of implementing the SCAQMD's engineering design, providing the required audio-visual functionality in both rooms. As a result of successful responses to this RFP, Digital Networks Group, Inc. was identified as the most capable and qualified vendor to provide the audio-visual system upgrades in the Hearing Board and GB rooms. This action is to approve purchase of these services from Digital Networks Group, Inc. Funds (\$339,676) are available in the FY 2015-16 Budget.

**COMMITTEE:** Administrative, July 17, 2015; Less than a quorum was present; the Committee Members concurred that this item be approved by the Board.

**RECOMMENDED ACTION:**

Authorize the Executive Officer to execute a contract to purchase audio-visual system upgrades from Digital Networks Group, Inc. in the amount of \$339,676 from the Infrastructure Improvement Fund (Fund 2).

Barry R. Wallerstein, D.Env.  
Executive Officer

JCM:MAH:RG:AT:agg

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**Background**

On April 3, 2015, the SCAQMD released RFP #P2015-22 for Audio-Visual System Upgrades in the Hearing Board and GB Rooms. The purpose of the RFP was to solicit

proposals from qualified firms to upgrade SCAQMD's audio-visual systems in the Hearing Board and GB rooms at its Diamond Bar headquarters. Due to the audio-visual limitations in both rooms, SCAQMD is seeking a contractor to implement the SCAQMD's engineering design, upgrading the existing audio-visual systems. This turnkey project includes the purchase, installation (with minimal downtime), test, and deployment of the new cost-effective, state-of-the-art, audio-visual systems.

SCAQMD headquarters' conference center includes the Hearing Board Room (a quasi-judicial hearing chamber) and Conference Room GB (large conference room with a capacity of approximately 200, with movable tables and chairs that can be configured to meet various needs). The conference center is primarily used by SCAQMD staff, but is also used by a number of outside agencies. The conference center just underwent a major audio-visual system upgrade, which primarily involved the Auditorium, A/V Control Room, and Conference Center Room CC8. During this upgrade, additional enhancements were identified for Conference Room GB and the Hearing Board Room to allow expanded utilization of the rooms under a variety of circumstances.

The Hearing Board Room lacks video recording capability, and lacks the ability to webcast hearings in progress. Conference Room GB lacks video recording capability, has an inadequate size display at the front of the room, lacks webcast capability, lacks video conference capability, and has an inadequate sound system for the room in numerous usage scenarios.

### **Outreach**

In accordance with SCAQMD's Procurement Policy and Procedure, a public notice advertising the RFP and inviting bids was published in the Los Angeles Times, the Orange County Register, the San Bernardino Sun, and Riverside County's Press Enterprise newspapers to leverage the most cost-effective method of outreach to the South Coast Basin.

Additionally, potential bidders may have been notified utilizing SCAQMD's own electronic listing of certified minority vendors. Notice of the RFP has been emailed to the Black and Latino Legislative Caucuses and various minority chambers of commerce and business associations, and placed on the Internet at SCAQMD's website (<http://www.aqmd.gov>).

### **Bid Evaluation**

Twenty-five copies of the RFP were mailed out and seven vendors attended the mandatory bidders conference held on April 21, 2015. Two bids were received in response to the RFP when final bidding closed at 1:00 p.m. on June 4, 2015. Both vendors were local businesses; neither was a women-owned business enterprise; certified minority-owned; disabled veteran-owned, or non-certified minority-owned business enterprise.

The panel evaluated the two proposals based on criteria specified in the RFP, which included completeness of response, cost, understanding of the requirements, contractor qualifications, and references regarding past experience.

The Attachment reflects the evaluation of the bids and the respective ratings. One of the proposals was deemed non-responsive because they did not include a three-year maintenance contract, and other components that were specified in the RFP.

**Panel Composition**

The five-member evaluation panel consisted of a Design Consultant from TECADS, Inc., a Senior Clerk of the Boards from the Executive Office, and three staff from Information Management: an Audio-Visual Specialist, and two Telecommunications Supervisors. Of the five panelists, one is Asian, three are Caucasian, and one is Hispanic; four are male and one is female.

**Resource Impacts**

Funds for this project were approved by the Board as part of the Fiscal Year 2015-16 Budget and are available in the Infrastructure Improvement Fund (Fund 2).

**Attachment**

Evaluation of Respondents to RFP #P2015-22

## ATTACHMENT

### Evaluation of Respondents to RFP #P2015-22

Two proposals were received in response to this RFP: a complete bid package from Digital Networks Group, Inc. (DNG), and a non-responsive.

#### Standard Services Criteria (70 points maximum)

	Proposer
	DNG
Panel Average	70

#### Cost (30 points maximum)

	Proposer
	DNG
Bid Amount	\$339,676
Panel Average	30

#### Additional Points (15 points maximum)

	Proposer
	DNG
Low-Emission Vehicle Business Points (Maximum = 5)	5
Local Business (Non-EPA Funded Projects) Points (Maximum = 5)	5
Off-Peak Hours Delivery Business Points (Maximum = 2)	2
Panel Average	12
<b>Total Points</b>	<b>112</b>

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BOARD MEETING DATE: September 4, 2015

AGENDA NO. 12

**TITLE:** Approve Contribution for Endowment to University of California Riverside to Support County of Riverside, University of California Riverside, University of California Riverside CE-CERT, City of Riverside, and Riverside Public Utilities Proposal for CARB's Southern California Consolidation Project

**SYNOPSIS:** CARB is seeking a new and expanded facility in Southern California for vehicle emissions testing and office space for its Mobile Source related staff that are currently located in El Monte, California. The new facility is greatly expanded compared to the existing facility and will need to house a greater number of staff. An opportunity has arisen to support the overall Riverside proposal in a manner that could result in significant dividends for SCAQMD. Specifically, there is an opportunity to enhance the SCAQMD's long-standing relationship with University of California Riverside through an Endowment that could provide additional training of SCAQMD staff, opportunities for enhanced candidate pools for mobile source related positions at SCAQMD, and additional opportunities for SCAQMD to partner on mobile source issues related to emissions characterization and control and strategy implementation. Staff recommends a \$1 million Endowment from interest accrued in the BP Arco Settlement Projects Fund (46) toward the proposal being put forth by the Riverside Team for specific purposes.

**COMMITTEE** Special Administrative, August 14, 2015; Recommended for Approval

**RECOMMENDED ACTIONS:**

1. Authorize the Chairman to contribute \$1,000,000 for an Endowment for an SCAQMD Air Quality/Climate Change Research and Training Program to the University of California Riverside from interest accrued in the BP Arco Settlement Projects Fund (Fund 46) to support the Riverside proposal for CARB's Southern California Consolidation Project.

Barry R. Wallerstein, D.Env.  
Executive Officer

MBO:lg

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**Background**

The California Air Resources Board (CARB) is seeking a new and expanded facility in Southern California for vehicle emissions testing and office space for its Mobile Source related staff that are currently located in El Monte, California. The new facility will be greatly expanded compared to the existing facility and will need to house a greater number of staff. The "Riverside Team", including the County of Riverside, University of California Riverside (UCR), UCR's College of Engineering-Center for Environmental Research and Technology (CE-CERT), the City of Riverside, and the Riverside Public Utilities (RPU), has submitted a proposal for CARB's Southern California Consolidation Project.

The proposal includes a primary proposal and two alternatives, all of which include: 1.) the joint use by CARB and UCR CE-CERT of existing UCR CE-CERT facilities and laboratories, and 2.) transfer to CARB of County owned land and privately owned land that will be purchased by the County. The primary proposal includes the County's purchase of the privately owned land and transfer of land to CARB for non-monetary consideration and continued support to facilitate the development of the facilities. CARB will then be responsible for the financing and construction of the facilities.

**Proposal**

An opportunity has arisen to support the Riverside Team proposal in a manner that could result in significant dividends for SCAQMD. Specifically, there is an opportunity to enhance the SCAQMD's long-standing relationship with UCR in a manner that could provide additional training of SCAQMD staff, enhanced opportunities for enhanced candidate pools for mobile source related positions, and additional opportunities for SCAQMD to partner on issues related to mobile source emissions characterization and control, related health impacts, and planning and control strategy implementation. Attachment 1 contains an outline received from UCR regarding a potential Endowment approach. Details/refinements would need to be further discussed with UCR, including specific use of SCAQMD funding, and guided by Board direction. Staff is

recommending \$1 Million for an Endowment from interest accrued in the BP Arco Settlement Projects Fund (46) linked to the proposal being put forth by the Riverside Team and contingent upon CARB's selection of the Riverside site.

**Resource Impact**

Funds are available for a contribution of \$1 Million from the BP Arco Settlement Projects Fund (46).

**Attachments**

“Endowing an Air Quality/Climate Research and Training Center at the University of California Riverside”

Endowing an  
**Air Quality/Climate Research and Training Program**  
at the University of California Riverside

UC Riverside has a long history of excellence in air pollution research, beginning with understanding pollution impacts on the state's agriculture at the Citrus Experiment Station in the 1950s. This ground-breaking research led to the establishment of UCR's comprehensive Statewide Air Pollution Research Center in the late 1960s. In 1992, UC Riverside introduced a complementary center called CE-CERT (College of Engineering-Center for Environmental Research and Technology) focused on engineering solutions to air quality, transportation, and energy issues. Today, UC Riverside's faculty from the School of Medicine, School of Public Policy, School of Business, and College of Engineering are conducting, at any given time, over \$50 million dollars in air quality and climate change research, embracing an interdisciplinary approach to learning and research facilitated by centers such as CE-CERT. This research has established UC Riverside as a preeminent resource in this area and our commitment to this topic is stronger than ever, made evident by new activities such as UCR's research role in the UC Net Zero Climate Initiative, UCR's 2020 strategic plan that highlights sustainability as one of the five key growth areas, and a dozen new faculty being recruited in health, air quality, and sustainable transportation.

Continuing its mission of research and education in the field of air pollution and climate change, UC Riverside is seeking \$1 million in endowment funding to establish a permanent ***Air Quality & Climate Research Training Program*** dedicated specifically to the important air and climate issues being addressed by the South Coast Air Quality Management District and the California Air Resources Board. UC Riverside is committing matching support to this new program, providing faculty salary support as well as leveraging specific "cluster" hires of faculty from a breadth of disciplines that are pertinent to the program. In addition, it is envisioned that participants of other organizations will provide on-going support to sustain this proposed program well in to the future. This training program will be located at CE-CERT and will train professionals and graduate students entering the workforce on the emerging issues and newest research related to air quality and climate change. The training program will take advantage of the existing faculty and knowledge base, but more importantly the endowment will go to support new course development and new faculty hires in relevant areas:

- ***Emissions and Air Quality***: College of Engineering - Dr. David Cocker, Dr. Kent Johnson, Dr. Heejung Jung, Dr. Kelley Barsanti, Dr. Wayne Miller, Dr. Tom Durbin, additional faculty to be hired;
- ***Health Impacts of Air Pollution***: School of Medicine, College of Engineering, & College of Natural and Agricultural Sciences - Dr. David Lo, Dr. David Cocker, Dr. Akua Asa-Awuku, Dr. Michael Allen, TBD Pulmonary physiologist, TBD Medical Epidemiologist, TBD Research Clinical Pulmonologist;
- ***Climate Change Impacts and Air Quality Co-Benefits***: College of Engineering & College of Natural and Agricultural Sciences - Dr. Mary Droser, Dr. Akua Asa-Awuku, Dr. Michael Allen, Dr. Akula Venkatram, additional faculty to be hired;
- ***Sustainable Transportation***: College of Engineering & School of Public Policy - Dr. Matt Barth, Dr. Julianne Allison, Dr. Kanok Boriboonsomsin, Dr. Guoyuan Wu, Dr. Kent Johnson, visiting faculty from sister NCST (National Center for Sustainable Transportation) campuses;
- ***Improving Policy to Meet Clean Air Standards and GHG Regulations***: School of Public Policy - Dr. Anil Deolalikar, Dr. Ron Loveridge, Dr. Julianne Allison, additional faculty to be hired.

This proposed program will be overseen by an Advisory Board consisting of representatives from UC Riverside, South Coast Air Quality Management District, and the California Air Resources Board. The Advisory Board will provide guidance for relevant topics and coursework as well as feedback and suggestions on the program effectiveness. In the initial years, support for this program will be directed towards establishing a complete



training curriculum with new coursework that complement existing courses, as well as hiring key faculty. The program will be sustained with proceeds from the endowment, as well as from support from a consortium of outside organizations that will participate and benefit from the program.

Example topic areas and coursework are outlined below:

#### **TOPIC 1: EMISSIONS & AIR QUALITY**

- *Quantifying and Measuring Emissions from Multiple Sources*
- *Emissions Impacts of Alternative Fuels*
- *Comparison of Certification and In-Use Emissions*
- *Collecting Real World Emissions Using Portable Emission (and Activity) Measurement Systems*
- *Distributed Ambient Monitoring to Improve Exposure Estimates and Air Quality Modeling*

#### **TOPIC 2: HEALTH IMPACTS OF AIR POLLUTION**

- *Cardiovascular, Neurodevelopmental and Neurodegenerative Responses to Air Pollution*
- *Temporal and Spatial Differences of Individual Pollutant and Pollutant Mixtures*
- *Health Effects of Inhaled Pollutants, Toxin-Laden Dusts, Pollens, and Microbes*
- *Health Disparities and Responses to Policy across Racial, Ethnic, and Socioeconomic Groups*

#### **TOPIC 3: CLIMATE CHANGE IMPACTS**

- *Climate Change and Sustainability*
- *Climate Modeling of the Upper Atmosphere*
- *Regional and Microscale Dispersion Modeling*
- *The Role of Particles and Black Carbon in CCN and Cloud Formation*
- *Secondary formation of PM, Toxics, and Ozone and Greenhouse Gases*

#### **TOPIC 4: SUSTAINABLE TRANSPORTATION**

- *Low Carbon Infrastructure and Efficient Transportation System Operation*
- *Low Impact Travel and Sustainable Land Use*
- *Zero Emission Vehicles and Fuel Technologies*
- *Evaluating the Performance of Electric and Hybrid Heavy Duty Vehicles*
- *The Role of Intelligent Transportation Systems and Automation on Transportation Efficiency*

#### **TOPIC 5: IMPROVING POLICY TO MEET CLEAN AIR STANDARDS AND GHG REGULATIONS**

- *International Air Quality Policies and Bold Initiatives*
- *Integration of Climate Change, Toxic and Criteria Pollution Regulations – Considerations and Benefits*
- *Health Disparities and Responses to Policy across Racial, Ethnic, and Socioeconomic Groups*
- *Considerations of Logistics in Transportation Planning and Supply Chain Management*

## Endowments at the University of California – Riverside

The size and capacity of UCR's faculty has increased exponentially since its founding, a reflection of the University's ongoing commitment to academic excellence and discovery. One factor helping to propel this trajectory has been the University's dedication to helping faculty meet their research needs through the establishment of endowments that financially support faculty research, teaching, and professional activity. Often named in honor or memory of an individual, organization, or corporation, endowments are critical to providing financial stability for the University and strengthening the University's ability to attract and retain high-caliber/high-performing professors.

The establishment of a \$1 million endowment in air quality/climate research and training is one of the strongest ways SCAQMD can achieve a substantive and positive impact in this field. As a permanent, self-sustaining source of funding, the endowment's assets are invested by the UCR Foundation. Each year, a portion of the fully-funded endowment is paid out to support the fund's purpose and any earnings in excess of this distribution are used to build the fund's market value. In this way, an endowment fund can grow and provide support for its designated purpose in *perpetuity*.

SCAQMD has the option to name the fund, e.g., SCAQMD Endowment for Excellence in Air Quality & Climate Research and Training, and, in consultation with CE-CERT and the UCR Advancement Office, broadly identify the scope of research to be funded. For example, designated funds can be used to cover a wide variety of expenses associated with the area of training and research that it is intended to support. As a benefit, the SCAQMD would have permanent access to the classes for their personnel and play a role in advising the direction of the program.

Additionally, because world-class faculty consider the quality of an institution by their endowments, the availability of these types of funds draws the world's best to UCR. In addition to the needed funds that it provides, an endowment also gives an added degree of prestige to the program it supports, as it recognizes the professional success and accomplishments. Further, this prestige attracts top graduate and undergraduate students, as well as professional staff who want to participate in the coursework and work side by side with the faculty. In this way, establishing an endowment creates a positive feedback loop and has a critical multiplier effect on UCR and its air quality/climate research and training program.

[↑ Back to Agenda](#)

BOARD MEETING DATE: September 4, 2015

AGENDA NO. 13

PROPOSAL: Revise Procurement Policy and Procedure

SYNOPSIS: This action is to revise SCAQMD's Procurement Policy and Procedure to incorporate "most favored customer" preference into the procurement process.

COMMITTEE: Administrative, July 17, 2015; Less than a quorum was present; the Committee Members concurred that this item be approved by the Board.

**RECOMMENDED ACTION:**

Adopt the revised Procurement Policy and Procedure.

Barry R. Wallerstein, D.Env.  
Executive Officer

MBO:lg

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**Background**

SCAQMD's Procurement Policy and Procedure, adopted January 9, 1998 and last amended May 2012, establishes the policies and procedures which govern contracting and/or purchasing of services, materials, equipment, supplies, and fixed assets by SCAQMD. The Administrative Committee recommended that the Policy be updated to incorporate "most favored customer" preference into the procurement process to ensure SCAQMD is receiving the best pricing and terms from vendors and contractors.

**Proposal**

It is recommended that SCAQMD's Procurement Policy and Procedure be amended to:

1. define "most favored customer" status,
2. require procurement processes, including bidding procedures, sole source awards, and RFP/RFQ processes to include a certification for "most favored customer" status to indicate if the vendor is willing to offer such status, and
3. give preference to vendors who agree to offer "most favored customer" status, including providing preference points through the proposal evaluation process.

The purpose of these amendments is to ensure SCAQMD receives the best pricing and terms from vendors and contractors providing goods and/or services to the SCAQMD.

**Resource Impacts**

Staff anticipates receiving “most favored customer” status from vendors and contractors, resulting in possible cost savings and/or cost containment.

**Attachment**

Revised Procurement Policy and Procedure (proposed changes are shown as underlined or strikethrough.)

# SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

## PROCUREMENT POLICY AND PROCEDURE

### SECTION I: PURPOSE

- A. It is the policy of the South Coast Air Quality Management District (SCAQMD) to make available to all its offices and employees those services, supplies, equipment, materials, and fixed assets which are essential to the operation of the SCAQMD.
- B. The execution of this policy is the function of the responsible officer as set forth herein.
- C. The procedures set forth in this policy govern contracting and/or purchasing of services, materials, equipment, supplies, and fixed assets by the SCAQMD.
- D. The SCAQMD Board may contract for services, materials, equipment, supplies, and fixed assets as may be necessary or convenient for the exercise of duties imposed upon the SCAQMD.

### SECTION II: GOVERNING BODY AND APPLICABLE LAWS

- A. The SCAQMD is organized pursuant to Chapter 5.5, Part 3, Division 26 of the Health and Safety Code.
- B. The governing body of the SCAQMD is a Board of Directors composed in accordance with Health and Safety Code Section 40420 ("SCAQMD Board").
- C. The SCAQMD is required to adopt a purchasing policy pursuant to Government Code Section 54202.

### SECTION III: PARTICIPATION IN THE PROCUREMENT PROCESS

#### A. General

It is the policy of the SCAQMD to ensure that all businesses including minority business enterprises, women business enterprises, disabled veteran business enterprises and small businesses have a fair and equitable opportunity to compete for and participate in SCAQMD contracts.

#### B. Definitions

The definition of minority, women and disadvantaged business enterprises set forth below is included for purposes of determining compliance with the affirmative steps requirement described in paragraph (F) below on procurements funded in whole or in part with federal funds which involve the use of subcontractors. The definitions provided for disabled veteran

business enterprise, local business, small business enterprise, low-emission vehicle business, off-peak hours delivery business and benefits incentive business are provided for purposes of determining eligibility for point or cost considerations in the evaluation process.

1. "-Women business enterprise" (/WBE) as used in this policy means a business enterprise that meets all of the following criteria:
  - a. a business that is at least 51 percent owned by one or more women, or in the case of any business whose stock is publicly held, at least 51 percent of the stock is owned by one or more or women.
  - b. a business whose management and daily business operations are controlled by one or more women.
  - c. a business which is a sole proprietorship, corporation, or partnership with its primary headquarters office located in the United States, which is not a branch or subsidiary of a foreign corporation, foreign firm, or other foreign-based business.

~~2. "~~

2. "Disabled veteran" as used in this policy is a United States military, naval, or air service veteran with at least 10 percent service-connected disability who is a resident of California.
3. "Disabled veteran business enterprise" (DVBE) as used in this policy means a business enterprise that meets all of the following criteria:
  - a. is a sole proprietorship or partnership of which at least 51 percent is owned by one or more disabled veterans or, in the case of a publicly owned business, at least 51 percent of its stock is owned by one or more disabled veterans; a subsidiary which is wholly owned by a parent corporation but only if at least 51 percent of the voting stock of the parent corporation is owned by one or more disabled veterans; or a joint venture in which at least 51 percent of the joint venture's management and control and earnings are held by one or more disabled veterans.
  - b. the management and control of the daily business operations are by one or more disabled veterans. The disabled veterans who exercise management and control are not required to be the same disabled veterans as the owners of the business.
  - c. is a sole proprietorship, corporation, or partnership with its primary headquarters office located in the United States, which is not a branch or subsidiary of a foreign corporation, firm, or other foreign-based business.
4. "Local business" as used in this policy means a company that has an ongoing business within the South Coast AQMD at the time of bid or proposal submittal and performs 90% of the work related to the contract within the South Coast AQMD and satisfies the requirements of subparagraph H below.

5. "Small business" as used in this policy means a business that meets the following criteria:
  - a. 1) an independently owned and operated business; 2) not dominant in its field of operation; 3) together with affiliates is either:
    - A service, construction, or non-manufacturer with 100 or fewer employees, and average annual gross receipts of ten million dollars (\$10,000,000) or less over the previous three years, or
    - A manufacturer with 100 or fewer employees.
  - b. Manufacturer means a business that is both of the following:
    - 1) Primarily engaged in the chemical or mechanical transformation of raw materials or processed substances into new products.
    - 2) Classified between Codes 311000 and 339000, inclusive, of the North American Industrial Classification System (NAICS) Manual published by the United States Office of Management and Budget, 2007 edition.
6. "Joint ventures" as defined in this policy pertaining to certification means that one party to the joint venture is a DVBE or small business and owns at least 51 percent of the joint venture.
7. "Low-Emission Vehicle Business" as used in this policy means a company or contractor that uses low-emission vehicles in conducting deliveries to the [SCAQMD](#). Low-emission vehicles include vehicles powered by electric, compressed natural gas (CNG), liquefied natural gas (LNG), liquefied petroleum gas (LPG), ethanol, methanol, hydrogen and diesel retrofitted with particulate matter (PM) traps.
8. "Off-Peak Hours Delivery Business" as used in this policy means a company or contractor that commits to conducting deliveries to the [SCAQMD](#) during off-peak traffic hours defined as between 10:00 a.m. and 3:00 p.m.
9. "Benefits Incentive Business" as used in this policy means a company or contractor that provides janitorial, security guard or landscaping services to the [SCAQMD](#) and commits to providing employee health benefits (as defined below in Section VIII.D.2.d) for full time workers with affordable deductible and co-payment terms.
10. "Minority Business Enterprise" as used in this policy means a business that is at least 51 percent owned by one or more minority person(s), or in the case of any business whose stock is publicly held, at least 51 percent of the stock is owned by one or more or minority persons.
  - a. a business whose management and daily business operations are controlled by one or more minority persons.

- b. a business which is a sole proprietorship, corporation, or partnership with its primary headquarters office located in the United States, which is not a branch or subsidiary of a foreign corporation, foreign firm, or other foreign-based business.
  - c. "Minority person" for purposes of this policy, means a Black American, Hispanic American, Native-American (including American Indian, Eskimo, Aleut, and Native Hawaiian), Asian-Indian (including a person whose origins are from India, Pakistan, and Bangladesh), Asian-Pacific-American (including a person whose origins are from Japan, China, the Philippines, Vietnam, Korea, Samoa, Guam, the United States Trust Territories of the Pacific, Northern Marianas, Laos, Cambodia, and Taiwan).
- e. 11. "Most Favored Customer" as used in this policy means that the SCAQMD will receive at least as favorable pricing, warranties, conditions, benefits and terms as other customers or clients making similar purchases or receiving similar services.
142. Disadvantaged Business Enterprise" as used in this policy means a business that is an entity owned and/or controlled by a socially and economically disadvantaged individual(s) as described by Title X of the Clean Air Act Amendments of 1990 (42 U.S.C. 7601 note) (10% statute), and Public Law 102-389 (42 U.S.C. 4370d)(8% statute), respectively;
- a Small Business Enterprise (SBE);
  - a Small Business in a Rural Area (SBRA);
  - a Labor Surplus Area Firm (LSAF); or
  - a Historically Underutilized Business (HUB) Zone Small Business Concern, or a concern under a successor program.
- C. Under Request for Quotations (RFQ), DVBEs, DVBE business joint ventures, small businesses, and small business joint ventures shall be granted a preference in an amount equal to 5 percent of the lowest cost responsive bid. Low-Emission Vehicle Businesses shall be granted a preference in an amount equal to 5 percent of the lowest cost responsive bid. Off-Peak Hours Delivery Businesses shall be granted a preference in an amount equal to 2 percent of the lowest cost responsive bid. Local businesses (if the procurement is not funded in whole or in part by EPA grant funds) shall be granted a preference in an amount equal to 2 percent of the lowest cost responsive bid. Businesses offering Most Favored Customer status shall be granted a preference in an amount equal to 2 percent of the lowest cost responsive bid.
- D. Under Request for Proposals (RFP), DVBEs, DVBE joint ventures, small businesses, small business joint ventures and benefits incentive businesses shall be awarded ten (10) points in the evaluation process. A non-DVBE or large business shall receive seven (7) points for subcontracting at least 25 percent of the total contract value to a DVBE or small business. Low-Emission Vehicle Businesses shall be awarded five (5) points in the evaluation process. On procurements that are not funded in whole or in part by EPA grant funds local businesses shall receive five (5) points. Off-Peak Hours Delivery Businesses shall be awarded two (2) points in the evaluation process. Businesses offering Most Favored Customer status shall be awarded two (2) points in the evaluation process.



- E. The SCAQMD will ensure that discrimination in the award and performance of contracts does not occur on the basis of race, color, sex, national origin, marital status, sexual preference, creed, ancestry, medical condition, or retaliation for having filed a discrimination complaint in the performance of SCAQMD contractual obligations.
- F. When contracts are funded in whole or in part by federal funds, and if subcontracts are to be let, the Contractor must comply with the following, evidencing a good faith effort to solicit disadvantaged businesses. Contractor shall submit a certification signed by an authorized official affirming its status as a MBE or WBE, as applicable, at the time of contract execution. The SCAQMD reserves the right to request documentation demonstrating compliance with the following good faith efforts -prior to contract execution.
1. ~~;~~ Ensure Disadvantaged Business Enterprises (DBEs) are made aware of contracting opportunities to the fullest extent practicable through outreach and recruitment activities. For Indian Tribal, State and Local Government recipients, this will include placing DBEs on solicitation lists and soliciting them whenever they are potential sources.
  2. Make information on forthcoming opportunities available to DBEs and arrange time frames for contracts and establish delivery schedules, where the requirements permit, in a way that encourages and facilitates participation by DBEs in the competitive process. This includes, whenever possible, posting solicitations for bids or proposals for a minimum of 30 calendar days before the bid or proposal closing date.
  3. Consider in the contracting process whether firms competing for large contracts could subcontract with DBEs. For Indian Tribal, State and Local Government recipients, this will include dividing total requirements when economically feasible into smaller tasks or quantities to permit maximum participation by DBEs in the competitive process.
  4. Encourage contracting with a consortium of DBEs when a contract is too large for one of these firms to handle individually.
  5. Using the services and assistance of the Small Business Administration and the Minority Business Development Agency of the Department of Commerce.
  6. If the prime contractor awards subcontracts, require the prime contractor to take the above steps.
- G. To the extent that any conflict exists between this policy and any requirements imposed by federal and state law relating to participation in a contract by a MBE, WBE, and/or DVBE as a condition of receipt of federal or state funds, the federal or state requirements shall prevail.
- H. When contracts are not funded in whole or in part by federal funds, a local business preference will be awarded. For such contracts that involve the purchase of commercial off-the-shelf products, local business preference will be given to suppliers or distributors of commercial off-the-shelf products who maintain an ongoing business within the geographical boundaries of the SCAQMD. However, if the subject matter of the RFP or RFQ calls for the fabrication or manufacture of custom products, only companies performing 90% of the manufacturing or fabrication effort within the geographical boundaries of the SCAQMD shall be entitled to the local business preference.

I. For federally funded procurements, the SCAQMD shall comply, where applicable, with federal fair share requirements set forth in 40 CFR 33, or equivalent federal regulations.

J. It is the policy of the SCAQMD to receive at least as favorable pricing, warranties, conditions, benefits and terms as other customers or clients making similar purchases or receiving similar services. To this purpose, formal bidding procedures, sole source awards, and RFP/RFQ processes will include a certification for “most favored customer” status. SCAQMD will give preference, where appropriate, to vendors who certify that they will provide “most favored customer” status to the SCAQMD.

JK. Responsibilities of SCAQMD Personnel:

1. The Manager of the Procurement Section shall be responsible for:
  - a. Developing and maintaining SCAQMD procedures to ensure proper implementation of this policy.
  - b. Reviewing solicitations to ensure compliance with this policy prior to public release.
  - c. Preparing a monthly report to the SCAQMD Board on solicitations scheduled to be released within the next month and preparing a semi-annual report to the SCAQMD Board on contract activity.
  - d. Reviewing contracts and purchase orders to ensure compliance with this policy and applicable laws and regulations.
  - e. Providing periodic training to SCAQMD personnel on contracting and purchasing policies and procedures.
  - f. Developing and maintaining a database of vendors seeking to do business with the SCAQMD.
  - g. Participating at trade fairs and other procurement outreach programs.
  - h. Publication of Notices Inviting Bids or Proposals.
  - i. Maintaining records sufficient to detail the significant elements of the procurement, including, but not limited to: authorizing Board Letter or memorandum to authorizing contract signatory; the Contract Request Authorization Memorandum from the originating organization; the Request for Proposal, if applicable; the contractor’s final proposal; and any miscellaneous SCAQMD internal correspondence concerning the terms of the contract.
2. SCAQMD Legal Counsel shall be responsible for:
  - a. Representing the SCAQMD in all litigation actions involving implementation of this policy.
  - b. Providing legal opinions regarding the interpretation of bid specifications, proposal requirements, and contract provisions.

3. SCAQMD staff is responsible for:
  - a. Taking all necessary and reasonable steps in accordance with applicable SCAQMD requirements to execute this policy and to ensure that all businesses including MBEs, WBEs, DVBEs and small businesses have fair and equitable participation in the solicitation process.
  - b. Screening the SCAQMD's vendor database to obtain names of companies which have expressed an interest in doing business with the SCAQMD.
  - c. Ensuring that relevant business enterprises listed in the database will receive copies of solicitations.
  - d. Coordinating the advertising of solicitations with the Manager of the Procurement Section or his or her designee in conformance with the policies and procedures of this policy.
  - e. Providing the Manager of the Procurement Section with a draft of the solicitation for review prior to public release and issuance of an RFQ or RFP number by the procurement staff.
  - f. For contracts funded in whole or in part with federal funds, performing and documenting a cost or price analysis as appropriate, including a lease versus purchase analysis, as set forth in 40 CFR 31.36(f) and 31.36(b)(4). Appropriate staff shall also maintain records sufficient to ~~–~~detail the significant history of a procurement, including the method of procurement, selection of the contract type, contractor selection or rejection, and the basis for the contract price.
  - g. Providing the Manager of the Procurement Section with all documents showing the history of the procurement as set forth in Section III(J)(1)(i).

#### **SECTION IV: PURCHASING OF SUPPLIES, SERVICES AND EQUIPMENT**

##### **A. Manager of the Procurement Section Authority and Responsibilities**

1. The Manager of the Procurement Section may purchase, upon appropriate authorization, services, materials, equipment, supplies, and fixed assets.
2. The Manager of the Procurement Section shall designate those persons who will have authority to make purchases.
3. The Manager of the Procurement Section shall act in the best interests of the SCAQMD in negotiating the best price on all goods and services, cost and other factors considered; and in accordance with all rules, regulations, and policies herein set forth, and all applicable provisions of law.
4. For non-consultant services and supplies which can reasonably be expected to exceed \$50,000 on an annual basis, the Manager of the Procurement Section may use a competitive prequalification process. As used in this policy, the term "prequalified vendors" shall be defined as the list of vendors whom the SCAQMD has determined to be qualified to provide particular services or supplies. As requirements become

identified, competitive bids will be sought only from those vendors on the prequalified vendor list.

5. Whenever possible, to effect economies of scale purchasing, the Manager of the Procurement Section shall pursue the policy of cooperative purchasing, provided that the quality of the available items meets SCAQMD requirements. Cooperative purchasing is the policy of allowing the Manager of the Procurement Section to place the SCAQMD's name on other governmental agencies' bid lists for items the SCAQMD is interested in purchasing. This allows the SCAQMD to enjoy the same terms, discounts, prices, and availability of items that would not be possible in all cases under small-scale purchasing.
6. The Manager of the Procurement Section shall advertise for public bidding, as set forth in Section VII hereof, any item directed by the SCAQMD Board or Executive Officer. In any event, the procedure described in Section VI must be followed for purchases in excess of \$25,000.
7. Subject to the supervision and direction of the Executive Officer, it shall be the duty of the Manager of the Procurement Section to purchase from time to time such quantities of supplies as may be required for official use and keep same in such storeroom or rooms as the SCAQMD shall provide. Such supplies shall be disbursed upon receipt of regular requisitions presented to the Manager of the Procurement Section or his or her designee.

#### B. Purchasing Methods:

The following purchasing methods shall be utilized, as applicable:

1. Formal Bid - A written bid solicited through public advertising and submitted under sealed bid procedures and which is opened and read on a specified date and time. This method is primarily used for equipment or services costing \$25,000 or more.
2. Informal bid – For procurements above \$2,500 and below \$25,000 an unadvertised written bid from a vendor may be utilized when the cost of the equipment or supplies is so low as to not justify the costs of the formal bidding procedure.
3. Telephone Bid – For procurements not to exceed \$2,500, telephone bids may be utilized by the Manager of the Procurement Section or his or her designee when the best interests of the SCAQMD may be served due to the need for immediate delivery or for other valid reasons.
4. Sole or Single Source – For procurements in excess of \$10,000, the Executive Officer may approve that the award may be made without a formal bid when the item or service to be purchased may be obtained from only one source and the item or service is one which does not lend itself to substitution. Said bids must be confirmed in writing and justified in accordance with the provisions of Section VIII(B).
5. Prior Bid, Last Price - After confirming the validity of a prior price, an award may be made on the basis of a prior bid or on the basis of a last price, if the conditions of a previous purchase are similar.

6. Request for Quotation - A written request describing materials, equipment, fixed assets, supplies or services sought which may contain certain plans and specifications. Quotations may be solicited through either formal or informal bid procedures.
  7. Formal bidding shall be used when economies of scale can be achieved, when there are equal and competitive products, or when discounts are applicable.
- C. Fixed Assets purchases shall be defined as purchases of assets that have a life of at least three years and a total acquisition cost of \$5,000 or more. Purchases of fixed assets are governed by the following:
1. The Manager of the Procurement Section shall be the responsible officer authorized to approve the purchase of budgeted fixed assets up to the amount of \$10,000 upon the request of the appropriate Deputy or Assistant Deputy Executive Officer.
  2. The Executive Officer may approve purchases of budgeted fixed assets from \$10,000 to \$75,000 and unbudgeted fixed assets up to \$10,000, or in case of an emergency or interruption of SCAQMD operations, up to \$50,000.
  3. Purchases of budgeted fixed assets over \$75,000 and unbudgeted fixed assets over \$10,000, except as provided in paragraph two above, require Board approval.
  - ~~4.~~
  4. The Manager of the Procurement Section may, by direct sales or otherwise, sell or dispose of any fixed assets belonging to the SCAQMD and found by the SCAQMD Board not to be required for public use. Fixed assets procured with federal funds may require prior approval from the awarding federal agency, which if required, shall be secured by SCAQMD staff prior to requesting the SCAQMD Board to approve disposal of the applicable asset(s).
    - a. All moneys collected from the proceeds of sales are to be deposited in the SCAQMD's bank account.
    - b. No member of the SCAQMD Board or family member and no SCAQMD employee or family member shall be permitted to purchase any assets or supplies of the SCAQMD, except those items disposed of in an open public auction.
    - c. Upon finding that it is in the best interests of the SCAQMD, the SCAQMD Board may authorize transfer of equipment, supplies, and materials for nominal monetary consideration to public agencies, nonprofit organizations that meet the requirements of Section 501(c) of the Internal Revenue Code, or educational institutions for use in air quality improvement or other activities in the public interest.
  5. The Manager of the Procurement Section may upon written approval of the Executive Officer or his or her designee purchase unbudgeted fixed asset items having a total unit cost not exceeding \$10,000, (including freight and taxes). The purchase of unbudgeted fixed assets having a total unit cost in excess of \$10,000 shall be made by the Manager of the Procurement Section only after approval of such purchase by the SCAQMD Board.

## **SECTION V: CONSTRUCTION, ALTERATION, OR IMPROVEMENT OF SCAQMD FACILITIES**

### **A. Executive Officer approval required:**

1. The Executive Officer may contract for the construction, alteration, or improvement of SCAQMD facilities when the total cost of the proposed, budgeted construction, alteration, or improvement does not exceed \$75,000. The Executive Officer may approve up to an additional \$75,000 in costs in each subsequent fiscal year.
2. Depending on the nature of the work to be performed, detailed plans and specifications are not required. However, any change or alteration of such plans and specifications shall be in writing.
3. The contracting methods utilized by the Executive Officer under these provisions shall be in accordance with Section IV.B.
- 4.

### **B. Governing Board approval required:**

1. The SCAQMD Board may contract for the construction, alteration, or improvement of SCAQMD facilities.
2. The SCAQMD Board shall adopt detailed plans and specifications for the work.
3. All bidders shall be afforded the opportunity to examine the plans and specifications. Any changes or alterations of the plans and specifications shall be in writing.
4. The bidding procedures set forth in Section VI of this policy shall be followed for idle projects when the cost of proposed construction alteration or improvement is estimated to exceed \$75,000.
5. The SCAQMD Board shall, to the greatest extent practicable, award the contract to the lowest cost responsive bidder, except as provided in Section VI(B). The person to whom the contract is awarded shall perform the work in accordance with the plans and specifications.
6. The person to whom the contract is awarded shall execute a completion and performance bond, to be approved by the Executive Officer, for the faithful performance of the contract.
7. If the cost of work is reduced by reason of any modification of the plans and specifications, such reduced cost shall be credited to the SCAQMD.
8. If the cost of the work increases for any reason, the Executive Officer may authorize the additional work up to an amount not to exceed \$75,000 in any one fiscal year. The Executive Officer may approve up to an additional \$75,000 in costs in each subsequent

fiscal year. If the cost exceeds the original contract by over \$75,000 in any one fiscal year, Board approval will be required.

- C. All solicitations for construction, alteration, or improvement of **SCAQMD** facilities shall require contractors to comply with applicable federal laws including but not limited to the Copeland Anti-Kickback Act, the Davis Bacon Act, the Contract Work Hours and Safety Standards Act, Occupational Safety and Health Act and applicable state laws governing health and safety, workers compensation prevailing wage rates, and labor hours.

## **SECTION VI: BIDDING PROCEDURES**

### **A. Request for Quotations or Proposals**

1. When the term "Request for Quotations" (RFQ) or "Request for Proposal" (RFP) is used in this policy, the following is meant: The responsible staff person shall, in writing, solicit quotations from qualified bidders. The prospective bidders shall be sent an RFQ or RFP which specifies the materials, equipment, fixed assets, supplies, or services sought and the date by which bids are required, which date shall be at least 30 days from the date and time the RFQ or RFP is mailed. For RFQs or RFPs approved by the Executive Officer, waiver of the 30-day period may be approved by the Executive Officer. For any RFP or RFQ, the Executive Officer may extend the response period.
2. In all cases in which written specifications are prepared and submitted for public bid and a trade name is specified, the specifications shall contain the phrase "or equal" and a bidder shall be allowed to bid upon a specific trade name product or its equivalent in quality and performance.
3. Subject to other provisions of this policy, a bid will be awarded to the lowest responsive, qualified bidder whose bid is in accordance with prescribed requirements and/or specifications.
4. The preparation of detailed specifications or obtaining of bids may be waived by the Executive Officer or his or her designee if proper justification has been provided that:
  - a. The items are available from only one source;
  - b. Public health or property may be endangered by delay;
  - c. An emergency or interruption of **SCAQMD** operations has occurred;
  - d. Required construction, repair, or project completion dates cannot be met;
  - e. Used or surplus equipment or supplies cannot be covered by specifications or plans;  
or
  - f. Other circumstances exist which, in the determination of the Executive Officer, require waiver in the best interests of the **SCAQMD**.

### **B. Acceptance or Rejection of Bids**

1. The SCAQMD Board or appropriate officer may accept or reject all or any bids and quotations or may accept or reject a part of any bid and to waive technical defects if to do so best serves the interests of the SCAQMD. Preference will be given, however, to the lowest cost responsive bidder.
2. In the event all bids or quotations are rejected, the SCAQMD Board or appropriate officer, may take any of the following actions:
  - a. Solicit new bids or quotations. In the event that a "Notice Inviting Bids/Proposals" was required, the notice must be re-advertised.
  - b. Proceed to purchase equipment, materials, services, fixed assets or supplies through the State General Services Agency pursuant to Government Code Section 54205, if feasible.
3. The Executive Officer and/or Governing Board may award the contract to a bidder, other than the bidder determined to be the lowest bidder, in the event the Executive Officer and/or the Governing Board determine that another bidder would provide the best value to the SCAQMD. In such case, the supporting rationale for such a determination must be provided. The determination shall be on the bids or quotations and on evidence provided in the quotation and/or any other evidence provided during the bid review process. Evidence provided during the bid review process is limited to clarification by the bidder of information presented in his/her proposal/quotation.
4. In the event that no bids were received after a written solicitation or advertising, the SCAQMD Board or Executive Officer, may reissue the solicitations, or contract for the equipment, fixed assets supplies, materials, or services on a sole-source basis.

## **SECTION VII: PUBLICATION REQUIREMENTS FOR ADVERTISED PROCUREMENTS**

- A. For any purchase of alterations or improvements to SCAQMD facilities, services, materials, equipment, or fixed assets estimated to exceed \$25,000, the following procedures apply unless a written determination has been made by the Executive Officer or his or her designee that the estimated cost of the procurement does not justify the cost of advertising:
  1. A "Notice Inviting Bids/Proposals" shall be published in a newspaper of general circulation at least once a week for two successive weeks. Two publications in a newspaper published once a week or more often, with at least five days intervening between the respective publication dates are sufficient. The period of notice commences on the first day of publication and terminates at the close of business on the fourteenth day.
  2. One or more "Notices Inviting Bids/Proposals" shall be published in one or more of the following, whichever would allow the notice to be distributed to the largest number of persons or firms qualified to do the work:
    - a. Newspapers of general circulation (mandatory)



- b. California State Contracts Register
  - c. Journal of the Air & Waste Management Association
  - d. ARB Computer Bulletin Board
  - e. Professional journals and trade publications including small, minority, women, and veteran business publications, and
  - f. [SCAQMD Website on the Internet](#)
3. The "Notice Inviting Bids/Proposals" shall contain a brief description of the equipment, materials, supplies, or services sought, the address where the plans and/or specifications may be inspected or where additional information may be obtained, and time and place of delivery of the Bid or Proposal.
  4. A listing of open RFQs and RFPs will be made available to various legislative caucuses, community groups, trade organizations, chambers of commerce and other interested parties at the time the Notice Inviting Bids/Proposals is submitted for publication. Parties desiring copies of any of the RFQs or RFPs will be advised that a complete copy can be obtained by downloading it from the [SCAQMD](#) website or requesting a hard copy from the designated [SCAQMD](#) contact.

**SECTION VIII: CONTRACTING FOR CONSULTING AND PROFESSIONAL SERVICES**

**A. General**

1. It is the policy of the [SCAQMD](#) to utilize the most highly qualified professional services to carry out the responsibilities of the [SCAQMD](#).
2. Due to the nature of the work to be performed or the staffing level required, it may, from time to time, be necessary to utilize the services of outside contractors/consultants who are not employees of the [SCAQMD](#).

**B. Contracting Methods**

1. Proposals subject to this Section shall be advertised pursuant to the provisions of Section VII unless the Executive Officer waives the bidding requirements of this Section based upon a written documentation justifying a sole-source award, as described below
2. Except for contracts funded in whole or in part with federal funds, written justification for a sole-source award must be provided documenting that:
  - a. The cost of labor for preparation of the described documents exceeds the possible savings that could be derived from such detailed documents; or
  - b. Public health or property may be endangered by delay; or

- c. The desired services are available from only the sole-source based upon one or more of the following reasons:
    - (1) The unique experience and capabilities of the proposed contractor or contractor team;
    - (2) The project involves the use of proprietary technology;
    - (3) The contractor has ownership of key assets required for project performance; or
  - d. Other circumstances exist which in the determination of the Executive Officer require such waiver in the best interests of the SCAQMD. Such circumstances may include but are not limited to:
    - (1) Projects involving cost sharing by multiple sponsors
    - (2) Time extension of an existing contract;
    - (3) Projects involving a commitment to multiple project phases;
    - (4) Level-of-effort expert consultation services;
    - (5) Performance of SCAQMD work concurrent with local government official duties;
    - (6) Projects requiring compatibility with existing specialized equipment;
    - (7) Cooperative internship programs with accredited colleges and universities;
    - (8) Research and development efforts with educational institutions or nonprofit organizations.
3. For contracts funded in whole or in part with federal funds, written justification for sole-source award must be provided documenting that awarding a contract is infeasible under small purchase procedures, sealed bids or competitive proposals and that one of the following circumstances applies:
- a. The item is available only from a single source;
  - b. The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
  - c. The awarding federal agency authorizes noncompetitive proposals; or
  - d. After solicitation of a number of sources, competition is determined inadequate.

### C. Selecting the Appropriate Contracting Method

1. Prior to the letting of a contract for consulting or professional services, SCAQMD staff shall prepare the following:
  - a. A written assessment of the objectives of the project or study in which previous work, if any, on the same subject shall be reviewed, including an assessment of current and future SCAQMD needs for the project and an estimate of the project cost;
  - b. A statement of work to be performed in carrying out the project or study;
  - c. A statement of the qualifications of persons necessary to perform the work including a description of experience, education, and training, and related work in general and specific fields; and
  - d. An assessment of the resources needed to carry out the project or study including, facilities, laboratory, equipment, and computer hardware and software.
2. Based upon an evaluation of the documentation prepared pursuant to Paragraph C1 and any other information deemed necessary, the Executive Officer or his or her designee shall:
  - a. Evaluate the ability of SCAQMD staff to perform all or part of the work, taking into consideration SCAQMD staff resources and other work being performed by SCAQMD staff; or
  - b. If it is determined that all or part of the work should be done pursuant to a contract for professional consulting services, the Executive Officer shall determine if the services shall be procured on a sole-source basis in accordance with the criteria set forth in Paragraph B2 above or a competitive basis. On federally funded procurements, the requirements of Paragraph B3 above shall be applicable in accordance with 40 CFR 31.36 or applicable federal regulation. On contracts for budgeted items over \$75,000 or unbudgeted items over \$10,000, the Executive Officer shall recommend to the SCAQMD Board that a sole-source contract be awarded. If a sole-source contract is approved by the SCAQMD Board, it may designate who is authorized to execute the contract.
3. If it is determined that the services should be procured competitively, the SCAQMD staff member responsible for originating the requirement shall prepare an RFP using the most current version of the sample RFP contained on the SCAQMD computer network and prepare a Bidders Mailing List. At a minimum, the RFP should contain the following areas specifically tailored to the requirement:
  - a. Background/Schedule of Events
  - b. Section III of the SCAQMD Procurement Policy
  - c. Work Statement/Schedule of Deliverables
  - d. Required Qualifications
  - e. Proposal Submittal Requirements
  - f. Proposal Evaluation Criteria

g. Draft Contract

h. Certifications and Representations

4. All RFPs must be reviewed by the Manager of the Procurement Section prior to assignment of an RFP number by Procurement staff. RFPs for budgeted items over \$75,000 that deviate from approved SCAQMD RFP evaluation criteria and RFPs for unbudgeted items over \$10,000 must be approved by the SCAQMD Board prior to release. RFPs for budgeted items up to \$75,000 and unbudgeted items under \$10,000 that comply with SCAQMD RFP evaluation criteria shall be approved by the Executive Officer or his or her designee.
5. RFPs estimated to exceed \$25,000 will be advertised in accordance with the procedures set forth in Section VII. The Notice Inviting Proposals shall specify the services sought and the date by which proposals are required, which date shall be at least 30 days from the date and time the RFP is mailed. Waiver of the 30-day period may be approved by the Executive Officer.

D. Proposal Evaluation and Contract Award

1. Sole-source proposals or a competitive proposal which is the sole response to an RFP should be evaluated by the originator of the requirement to ensure that the proposal is technically acceptable and that the proposed amount is reasonable based on previous proposals for similar work, knowledge of the marketplace, and SCAQMD's independent cost estimate. Documentation regarding the reasonableness of the proposed cost must be provided along with the sole-source justification.
2. Competitive proposals will be evaluated by a panel of three-to-five SCAQMD staff familiar with the subject matter of the project. The panel shall be appointed by the Executive Officer or his or her designee to evaluate the submitted proposals. In addition, the evaluation panel may include such outside public sector or academic community expertise as deemed desirable by the Executive Officer. The Executive Officer or his or her designee shall appoint a chairman from this group.

a. Evaluation of Proposals.

Each member of the evaluation panel shall be accorded equal weight in his or her rating of the proposals. The evaluation panel members shall evaluate the proposals according to specified criteria and shall assign a numerical score to each evaluation factor. Suggested guidelines for technical criteria and weightings are set forth below, but may be modified by the RFP originator based upon the specific project requirements and approval by the responsible Deputy Executive Officer.

b. Sample Proposal Evaluation Criteria

(1) Standardized Services	<u>Points</u>
Understanding of Requirement	20
Contractor Qualification	20
Past Experience	10

Cost		<u>50</u>
	TOTAL:	100

(2) R&D Projects Requiring Technical or Scientific Expertise, or Special Projects Requiring Unique Knowledge or Abilities

Understanding the Problem		20
Technical/Management Approach		20
Contractor Qualifications		20
Previous Experience on Similar Projects		10
Cost		<u>30</u>

TOTAL 100

(3) Additional Points

Small Business or Small Business Joint Venture		10
DVBE or DVBE Joint Venture		10
Benefits Incentive Business		10
Use of DVBE or Small Business Subcontractors		7
Low-Emission Vehicle Business		5
Local Business (Non-Federal Funded Projects)		5
Off-Peak Hours Delivery Business		2
<b>Most Favored Customer</b>		<b><u>2</u></b>

To receive additional points in the evaluation process for the categories of Small Business or Small Business Joint Venture, DVBE or DVBE Joint Venture or Local Business (for non-federal funded projects), the proposer must submit a self-certification or certification from the State of California Office of Small Business Certification and Resources at the time of proposal submission certifying that the proposer meets the requirements set forth in Section III. To receive points for the use of DVBE and/or Small Business subcontractors, at least 25 percent of the total contract value must be subcontracted to DVBEs and/or Small Businesses. To receive points as a Low-Emission Vehicle Business, the proposer must demonstrate to the Executive Officer, or designee, that supplies and materials delivered to the **SCAQMD** are delivered in vehicles that operate on either clean-fuels or if powered by diesel fuel, that the vehicles have particulate traps installed. To receive points as an Off-Peak Hours Delivery Business, the proposer must submit, at proposal submission, certification of its commitment to delivering supplies and materials to **SCAQMD** between the hours of 10:00 a.m. and 3:00 p.m. **To receive points for Most Favored Customer status, the proposer must submit, at proposal submission, certification of its commitment to provide most favored customer status to the SCAQMD.** To receive points as a Benefits Incentive Business, the proposer must provide, at a minimum, health insurance at one of the levels identified in Paragraph d below. Documentation showing proof of such insurance coverage must be submitted with the proposal. The cumulative points awarded for Small Business, DVBE, use of Small Business or DVBE Subcontractors, Benefits Incentive Business, Local Business, Low-Emission Vehicle Business and Off-Peak Hour Delivery Business shall not exceed 15 points.

- c. The Procurement Section will be responsible for monitoring compliance of suppliers awarded purchase orders based upon use of low-emission vehicles or off-peak traffic hour delivery commitments through the use of vendor logs which will identify the contractor awarded the incentive. The purchase order shall incorporate terms which obligate the supplier to deliver materials in low-emission vehicles or deliver during off-peak traffic hours. The Receiving department will monitor those qualified supplier deliveries to ensure compliance to the purchase order requirements. Suppliers in non-compliance will be subject to a two percent of total purchase order value penalty. The Procurement Manager will adjudicate any disputes regarding either low-emission vehicle or off-peak hour deliveries.
- d. Benefits Incentive Businesses, in order to receive 10 additional points, must provide affordable health insurance to full-time employees, which are defined as employees who work 30 hours or more per week. Affordable health insurance is defined to mean meeting or exceeding the following minimum levels of coverage:

**Employee Deductibles/Fees**

**PPO Plan Design**

In-Network Deductible \$500 single  
 In-Network Out-of-Pocket Maximum \$2,500  
 Out-of-Network Co-pay 30%  
 Office Visit Co-pay \$20 per visit  
 Retail Drug Co-pay \$11 (generic)/\$24(premium)/\$44(nonformulary)  
 Mail Order Drug Co-pay \$14 (generic) /\$32 (premium)/\$57 (nonformulary)  
 Single Contribution 10% or less of premium

**HMO Plan Design**

Office Visit Co-pay \$20  
 Inpatient Hospitalization \$250 deductible  
 Emergency Room Co-pay \$50 per visit  
 Retail Drug Co-pay \$11 (generic)/\$24(premium)/\$44(nonformulary)  
 Mail Order Drug Co-pay \$14 (generic) /\$32 (premium)/\$57 (nonformulary)  
 Single Contribution 10% or less of premium

Documentation to prove insurance coverage may include quotes from health insurance providers or a copy of the most recent health insurance invoice, with an attached Plan Summary. Documentation must not include medical information, employee names, or any personal employee information. An officer of the bidding company must certify in writing that the health insurance information provided is true and accurate and that, if selected, the company will provide health insurance to its full-time employees for the duration of the contract term at the same levels shown above or better. The selected Contractor will be required to update the proof of health insurance on an annual basis and to provide a certified copy of payroll if requested.

- e. For procurement of standardized services, technical factors including past experience shall be weighted at 50 points and cost shall be weighted at 50 points. For procurement of Research and Development (R & D) projects or projects requiring

technical or scientific expertise or special projects requiring unique knowledge and abilities, technical factors including past experience shall be weighted at 70 points and cost shall be weighted at 30 points. A proposal must receive at least 56 out of 70 points on R & D projects and projects for unique technical expertise in order to be deemed qualified for award.

- f. The responsible staff person shall prepare a summary of the proposal evaluations and a recommendation for the award to his or her responsible Deputy Executive Officer.
- g. The Executive Officer and/or Governing Board may award the contract to a proposer other than the proposer receiving the highest rating. In the event the Executive Officer and/or Governing Board determine that another proposer from among those technically qualified would provide the best value to the SCAQMD considering cost and technical factors, supporting rationale for such a determination must be provided. The determination shall be based solely on the Evaluation Criteria contained in the RFP, on evidence provided in the proposal and on any other evidence provided during the proposal review process. Evidence provided during the proposal review process is limited to clarification by the proposer of information presented in proposal.
- h. Contracts for budgeted items over \$75,000 and for unbudgeted items over \$10,000 must be approved by the SCAQMD Board. The Executive Officer may approve up to an additional \$75,000 in costs in each subsequent fiscal year. Contracts for budgeted items of \$75,000 or less and contracts for unbudgeted items of \$10,000 or less shall be approved by the Executive Officer and the Executive Officer may approve up to an additional \$75,000 in costs in each subsequent fiscal year. After approval by the Executive Officer or SCAQMD Board, the responsible staff person shall prepare a Contract Request Approval Memorandum, Scope Statement, Work Statement, and Cost or Payment Schedule and forward these documents to the Contracts Unit.
- i. The Contracts Unit will prepare the contract and forward all documents to the responsible staff person for final approvals by the ~~¶~~ DEO, or ADEO as applicable, Manager of the Procurement Section, SCAQMD Counsel and the Executive Officer. If the contract is funded in whole or in part with federal funds, the contract shall incorporate the awarding federal agency's applicable contract provisions as specified in the awarding agency's regulations (e.g. 40 CFR Part 31.36(i) for EPA grants, and 10 CFR Part 600.148 for DOE grants).
- j. Once approved, the Executive Officer or his or her designee or the Chair of the SCAQMD Board, and the successful proposer's authorized official will execute the contract.

## **SECTION IX: BID PROTEST PROCEDURE**

- A. It is the policy of the SCAQMD to consider protests from bidders or prospective bidders regarding SCAQMD's procurement actions. SCAQMD will respond to valid and timely protests. If SCAQMD determines that the protest is frivolous, the protester may be deemed ineligible for future contract awards.

## B. Procedure

1. General – The procedure set forth in this subsection is mandatory. Failure by a protester to comply with this subsection will constitute a waiver of any right to further pursue the protest, including the filing of a claim under the relevant Government Code section or initiating legal proceedings. In no event will a protest be considered if all proposals are rejected.
2. Submission of Protests – Protests must be submitted in writing to the SCAQMD Procurement Manager, 21865 Copley Drive, Diamond Bar, CA, 91765. A valid protest must include at a minimum:
  - a. Name, address and telephone number of the protester or its representative;
  - b. The procurement action being protested;
  - c. Detailed description of the specific legal and factual grounds of the protest, which include identifying the specific provisions of the solicitation, rules, regulations or laws upon which the protest is based;
  - d. Copies of all (or any) documentation supporting the allegations in the protest; and
  - e. The specific relief requested.
3. Types of Protests and Deadlines to File – SCAQMD will recognize the following types of protests:
  - a. Protest Regarding Solicitation – An interested party that is an actual or prospective bidder with a direct economic interest in the procurement may file a protest based on unduly restrictive or defective specifications or other apparent improprieties in the solicitation process affecting the interested party’s ability to submit a proposal and/or qualifications statements. Such protests must be received no later than ten (10) days prior to the deadline to submit proposals.
  - b. Protest Regarding Award of Contract – An actual bidder may file a protest regarding the award of a contract, based on SCAQMD’s determination of the responsiveness of the proposals, errors in calculation, or other apparent improprieties in the evaluation of proposals affecting the ranking/scoring of the proposals. In addition, a protest may be made on the grounds that the party awarded the contract fraudulently represented itself as a responsible bidder or that SCAQMD violated any local, State or federal laws in awarding the contract. Such protests must be received no later than ten (10) days after the contract has been awarded by the Governing Board. If the contract is not required to be awarded by the Governing Board and is awarded by the Executive Officer, or designee, in accordance with the Procurement Policy and Procedures, such protests must be received no later than ten (10) days after the contract is signed and executed by the Executive Officer, or designee.



4. SCAQMD's Response to Protests – Upon receipt of a valid and timely protest, the Executive Officer, or designee, will investigate the protest and will provide a written response to the protester within a reasonable time. If necessary, the Executive Officer, or designee, may extend the deadline to submit proposals to allow for a reasonable time to review the protest. The Executive Officer, or designee, at his or her sole discretion, may elect to withhold the contract award until the protest is resolved or denied or proceed with the award and implementation of the contract.
  
5. Protest Remedies – If the protest is upheld, the Executive officer, or designee, will consider all circumstances surrounding the procurement in his or her decision for a fair and reasonable remedy, including the degree of prejudice to the protester or to the integrity of the competitive procurement process, the urgency of the procurement, the extent of performance if the contract has already been executed and implemented, the cost to SCAQMD, and the impact of the proposed remedy. The remedy may include, but is not limited to, reissuance of the solicitation, revised evaluation of the proposals, or termination of the contract.

Revised 39/20125

BOARD MEETING DATE: September 4, 2015

AGENDA NO. 14

**PROPOSAL:** Authorize Executive Officer to Execute Agreement to Transfer Oversight of BP/SCAQMD Public Benefits Program to Board, Approve Administrative Changes to Existing Program Contracts, and Execute a Contract for Air Pollution Health Effects Study

**SYNOPSIS:** This action is to approve an agreement with BP to transfer oversight of the BP/SCAQMD Public Benefits Program to the Board, approve administrative changes for several current projects funded by the Program, and to fund a health study related to the ability of ambient pollutants to exacerbate the development of an allergic response in an animal model. The study is by the University of California, Los Angeles and Michigan State University for an amount not to exceed \$172,000. The proposed study will be funded from the BP/SCAQMD Public Benefits Oversight Special Revenue Fund (Fund 65).

**COMMITTEE:** Administrative, July 17, 2015; Less than a quorum was present; the Committee Members concurred that this item be approved by the Board.

**RECOMMENDED ACTIONS:**

1. Authorize the Executive Officer to execute an agreement with BP to transfer authority of the BP/SCAQMD Public Benefits Program from the BP/SCAQMD Public Benefits Oversight Committee to the Board;
2. Approve administrative changes related to project timelines and budget reallocations for project agreements of several ongoing projects funded under the Public Benefits Program as listed in the Attachment;
3. Authorize the Executive Officer to execute a contract with the University California, Los Angeles to conduct the research project “Determination of the Synergistic/Additive Adjuvant Effect among Ozone, Vapor-phase Pollutant and Particulate Matter on Allergic Sensitization” in an amount not to exceed \$172,000 from the BP/SCAQMD Public Benefits Oversight Special Revenue Fund (Fund 65).

Barry R. Wallerstein, D.Env.  
Executive Officer

## **Background**

In 2005, SCAQMD and BP West Coast Products LLC (BP) entered into a settlement agreement that committed BP to provide \$3,000,000 per year for ten years, for a total commitment of \$30,000,000, to fund community benefit programs selected by a Public Benefit Programs Oversight Committee. The Committee consists of two representatives from BP, two representatives from the Board, and a public member. To date, BP has expended \$29,822,198 under this agreement. The remaining funds (\$172,802) were transferred on January 2015 to SCAQMD into a BP/SCAQMD Public Benefits Oversight Special Revenue Fund and are available for new projects.

The program is nearing completion, and BP no longer has a presence within the District. Transferring oversight responsibility for the remaining portions of the program to the Board would allow the efficient wind down of the program. This oversight would transfer all decisions relating to the program, including expenditure of remaining funds and any amendments to ongoing projects.

## **Proposal**

This action is to transfer all remaining oversight of the BP/SCAQMD Public Benefits Program to the Board, to approve several requests for amendments to current project agreements, and to fund the second year of a research project, the first year of which was funded by the Public Benefits Program.

The requested agreement amendments are listed in the Attachments and include time extensions and budget modifications. Attachment 1 is a request from Queenscare Health Centers to reallocate funds among budget categories for their Pediatric Asthma Disease Management Programs. Attachment 2 is a request from Providence Little Company of Mary to reallocate funds among budget categories for the project "Creating Opportunities for Physical Activity" at Hawaiian Avenue and Gulf Avenue elementary schools in Wilmington. Attachment 3 is a request from USC to reallocate funds among budget categories and for a no-cost extension to October 1, 2016, for the study "New Tools for Maximizing Health and Economic Benefits of Air Pollution Regulation." Attachment 4 is a request from Long Beach Alliance for Children With Asthma to reallocate funds among budget categories and for a no-cost extension to August 1, 2015, for projects providing health care education and asthma management services.

The proposed health study is related to determining the ability of ozone to enhance the effects of particulate and vapor-phase pollutants on the development of allergic reactions in the lungs of experimental animals. The research proposal for this project was originally submitted in response to a Request for Proposals to the BP/SCAQMD Public Benefits Program Oversight Committee. The proposal received a favorable rating under the Committee's review process, and the initial year of the project was funded by the BP/SCAQMD Public Benefits Program. This request is to cover the

second phase of the research. Additional information on the proposed research project follows.

Ambient exposures to air pollutants have been associated with a number of health effects. In the South Coast, populations are exposed to a multi-pollutant mix which includes ozone, fine particulates, and organic substances in the vapor phase. These latter substances are often referred to as volatile and semi-volatile compounds. Ozone is a highly reactive oxidant of photochemical smog and co-exists with other air pollutants. It is formed through the interaction of sunlight with oxygen, nitrous oxides and volatile organic chemical compounds. Epidemiological evidence has established that exposure to ozone can cause respiratory problems including allergic airway inflammation such as asthma, and this has been corroborated in experimental studies. Although ozone occurs along with particulate matter and vapor-phase pollutants, the combined health effects of ozone and other air pollutants are not well studied. While the synergistic and/or additive effect between ozone and PM on allergic airway inflammation has been reported by human and animal studies, little is known about how co-exposure to ozone and vapor-phase pollutants or exposure to a multi-pollutant environment involving ozone, PM, and vapor-phase compounds will affect allergic airway inflammation.

The project, "Determination of the Synergistic/Additive Adjuvant Effect among Ozone, Vapor-phase Pollutant and Particulate Matter on Allergic Sensitization," will be accomplished by the University of California, Los Angeles in conjunction with Michigan State University. It includes administering extracts of particulate and vapor-phase samples obtained from ambient air in the South Coast Air Basin, along with exposures to ozone or to clean air. This project to investigate the synergistic/additive adjuvant effect among ozone, PM, and vapor-phase pollutants has the advantage of the availability of an ozone exposure system at Michigan State University. This system allows for the conducting of ozone-related multi-pollutant research.

Three objectives for achieving the project goal are to: (1) determine the adjuvant effect of PM on allergic sensitization to the experimental allergen ovalbumin (OVA); (2) assess the adjuvant effect of vapor-phase chemicals; and (3) investigate whether there is a synergistic adjuvant effect between PM and vapor-phase chemicals and whether ozone exposure influences the effects of particulate and vapor phase substances.

Previous experiments were conducted during the first phase of this project to accomplish objectives 1 and 2. The results showed that ambient PM<sub>2.5</sub> collected in San Bernardino, California could promote allergic sensitization, leading to an enhanced allergic airway inflammation upon allergen re-exposure in the mouse model. On the contrary, this effect was not observed in the animals exposed to the vapor-phase sample that was collected in parallel with the PM<sub>2.5</sub>. The experiments planned for the research

to be supported by this request will expand to include exposure to ozone in addition to the extracts from the particulate and vapor phase samples.

Based on previous studies, it is anticipated that either PM or ozone alone can exert an adjuvant effect on OVA sensitization, and there is a synergistic or additive adjuvant effect when the animals are exposed to both pollutants during OVA sensitization. As has been observed in the first year of the study, vapor alone was not sufficient to act as an adjuvant for OVA sensitization. However, the strong oxidant potential of ozone may alter or overwhelm the cellular antioxidant defense and therefore potentiate the capability of vapor-phase pollutants to act as an adjuvant on OVA sensitization. It is hypothesized that exposure to a combination of ozone, PM, and vapor during OVA sensitization will lead to the strongest allergic airway inflammation compared to exposure to one or two pollutants.

### **Benefits to SCAQMD**

The results of these projects will provide information to help understand the linkage between exposures to multiple pollutants, as occur in the South Coast, on the production of respiratory-related health effects. Information from this project will provide important insight to understanding how individual air pollutants contribute to the overall effect of a multi-pollutant environment (ozone, PM and vapor-phase compounds) on allergic airway inflammation such as asthma. To date, the impact of co-exposure to ozone, PM, and vapor-phase pollutants has not been studied as a collective issue due to lack of knowledge on the effects of vapor-phase chemical compounds. Such information will contribute to a strong scientific basis on which to develop and to assess strategies designed to protect the public from exposure to specific components or pollutants found in the South Coast.

### **Sole Source Justification**

Section VIII.B.2. of the Procurement Policy and Procedures identifies four major provisions under which a sole source award may be justified. This request for a sole source award is made under provision B.2.d. Other circumstances exist which in the determination of the Executive Officer require such waiver in the best interest of the SCAQMD. Specifically, clause B.2.d.(1): Projects including cost-sharing by multiple sponsors; clause B.2.d.(8): Research and development efforts with educational institutions or nonprofit organizations; and B.2.c.(1): The unique experience and capabilities of the proposed contractor or contractor team.

### **Resource Impacts**

The total cost for completion of this research project is \$385,618. For the initial year the amount of \$213,618 was funded by the BP/SCAQMD Public Benefits Program. Staff proposes to provide the cost of \$172,000 to complete the second phase of this project. Sufficient funds are available from the BP/SCAQMD Public Benefits Oversight Special Revenue Fund (Fund 65).

**Attachments**

1. Request from Queenscare Health Centers to Reallocate Funds Among Budget Categories
2. Request from Providence Little Company of Mary to Reallocate Funds Among Budget Categories
3. Request from USC to Reallocate Funds Among Budget Categories and for a No-Cost Extension to October 1, 2016, for the Study “New Tools for Maximizing Health and Economic Benefits of Air Pollution Regulation”
4. Request from Long Beach Alliance for Children With Asthma to Reallocate Funds Among Budget Categories and for a No-Cost Extension to August 1, 2015



**Pediatric Asthma Disease Management (PADM)**

950 South Grand Avenue, 2<sup>nd</sup> Floor South | Los Angeles, CA 90015

June 2, 2015

BP Oversight Committee (BPOSC)  
c/o Jean Ospital  
Health Effects Officer  
South Coast Air Quality Management District

Re: Request for Reallocation of Budget Line Items

Dear Committee Members:

QueensCare Health Clinics (QHC) is respectfully requesting approval to revise our cost proposal and reallocate certain budget items as detailed below:

<b>From Initial Proposed Line Items</b>	<b>Request To New Line Items</b>
Director of Nursing Salary (\$6,000)	PACE Continuing Education Asthma Education for Primary Care Providers (\$6,000)
Educational Materials (\$1,000)	Biostatistician (\$1,000)
Medical Supervisor (\$1,848)	Biostatistician (\$1,848)
Fringe Benefits (\$2,354)	CCP Certification Training (\$1,400) and Biostatistician (\$954)

The rationale for requesting these line item reallocations are:

1. Our organizational priorities have shifted slightly since the grant proposal was drafted in 2011-2012. We no longer have the position of Director of Nursing, so the salary allocation of \$6,000 would be better utilized toward the line item of PACE Continuing Education to provide asthma seminars for primary care providers in our community. The demand from primary care providers has exceeded our expectations so we believe this money will be well spent.
2. The Medical Supervisor's salary allocation has also decreased and would be better utilized in project evaluation by a biostatistician. A project evaluation/biostatistician line item was initially approved for \$3,000. We request an addition to the line item from the Medical Supervisor's salary and educational materials line item. We project that the project evaluation will cost more than we initially requested because QHC implemented a new electronic health record since the drafting of our original grant proposal. As a result, our data reporting parameters for this project have to be rebuilt for the new system and will require additional time by the biostatistician.
3. As a result of reallocations in salary the fringe benefits have decreased by \$2,354, \$1,400 of which we would like to reallocate to CCP Certification to train an additional Care Coordinator and \$954 to add 9.5 hours of project evaluation activities by Biostatistician (revision as of 5/27/15 per discussion with Dr. Ospital).

Thank you for your consideration of the above proposal. If you have any questions please do not hesitate to contact me.

Sincerely,

Emma Wolfe, MPH, CHES  
Program Director T: (323) 669-4346 ewolfe@queenscare.org

**QUEENSCARE HEALTH CENTERS  
PEDIATRIC ASTHMA DISEASE MANAGEMENT PROGRAM (PADM)  
RFP #PBOC-9  
2013-2014 [POSTPONED TO 2014-2016]  
PART II - COST PROPOSAL REVISED**

**A. LABOR: Staff Positions and Labor Category**

Estimates of labor cost, travel, fees and administrative costs are based on PADM's previous operating budgets and general experience.

**Program Director** - This position reports to the Chief Operations Officer, is a Master of Public Health (MPH) and Certified Health Education Specialist (CHES). For this project, the Program Director will drive the project's goals and activities, supervise staff, coordinate the project's ongoing planning, budgeting, evaluation and reporting. The Program Director will also be responsible for overseeing the development of the training curriculum for the adult Care Coordinators; implementing and coordinating the PACE seminars, overseeing the project evaluation and status reports. For this proposal this position is a 0.25 Full-Time Equivalent (FTE).

**Medical Supervisor** - The Medical Supervisor is a Board Certified pediatrician and will be in charge of training the Care Coordinators on the provision of patient asthma education for adults with asthma and related conditions. For this proposal this position is a 0.02 FTE

**Community Health Workers/Promotoras de Salud (CHW/P)** - The CHW/Ps report to the Program Director and deliver program services. For this project, they be providing direct services to patients, including patient education, case and psychosocial management support, conducting home visits and documenting their encounters on QFC's EHR. For this proposal this position is a 1.5 FTE.

~~**The Director of Nursing Services** - Director of Nursing Services is responsible for overseeing and managing all functions related to the structured delivery of clinical services and acting as the liaison between clinical operations and clinical administration to improve delivery of quality care. For this project, the Director of Nursing Services will work with PADM's Program Director to implement the training program for the adult asthma patient education program as well as the Chronic Care Professional (CCP) certification process. For this proposal this position is a 0.03 FTE.~~

**Fringe Benefits** are calculated at 30% of personnel salaries and include: FICA, SUI, Paid Days Off, Long-Term Sick Leave, Health, Life, Dental and Disability Insurance, and Retirement.

<b>Position</b>	<b>Hourly Billing Rate</b>	<b>Full Time Equivalent (FTE)</b>	<b>Hours per Month</b>	<b>Number of Months</b>	<b>Total Salary \$</b>
Program Director	\$40	0.25	43	24	\$41,280
Medical Supervisor	\$77	0.02	12	2	\$3,696
					<u>\$1,848</u>
Community Health Worker/Promotora de Salud	\$18	1.5	260	24	\$112,320
Director of Nursing Services	\$50	0.03	5	24	\$6,000
Fringe Benefits 30%		n/a	n/a	24	\$48,988
					<u>\$46,634</u>
<b>Total Salary &amp; Benefits</b>					<b>\$212,284</b>
					<b><u>\$202,082</u></b>



## B. SUBCONTRACTOR COSTS

	<b>\$ Proposed estimate for this project</b>	<b>Total</b>
Biostatistician: Project Evaluation	\$100 per hour for an estimated 30 68.05 hours of project evaluation study design and data analysis	<u>\$3,000</u> <u>\$6,805</u>
<b>Total</b>		<b>\$3,000</b> <b>\$6,805</b>

## C. TRAVEL COSTS

	<b>\$ Proposed estimate for this project</b>	<b>Total</b>
Travel for home visits (CHW/P)	Home visit travel costs (\$0.55 per mile) at approximately 350 miles for 50 home visits (total)	\$192
<b>Travel Costs Total</b>		<b>\$ 192</b>

## D. OTHER DIRECT COSTS

**Chronic Care Professional (CCP) certification course:** includes tuition fees for seven (7) staff, four (4) adult Care Coordinators and three (3) Community Health Workers/Promotoras de Salud for a 40-hour comprehensive chronic care and health coaching program; fee includes certification.

**Physician Asthma Care Education (PACE) seminar:** includes all estimated necessary costs to facilitate a seminar for community-based primary care providers, including a joint sponsorship with an accredited institution such as Hollywood Presbyterian Medical Center for providing Continuing Medical Education credits to attendees, seminar/course materials, fee for a master PACE trainer, and provision of dinner to participants to attract attendance.

**Environmental modification supplies:** includes zippered hypoallergenic mattress and pillow covers, and boric acid powder for cockroach remediation.

**Educational materials and printing:** includes educational handouts and materials printing and purchasing to reinforce the asthma education provided in the clinic and during home visits.

	<b>\$ Proposed estimate for this project</b>	<b>Total</b>
Chronic Care Certification courses	<del>CCP course fee per staff \$1,295 x 7 staff = \$9,065</del> <del>CCP course fee per staff \$1,395 x 8 staff = \$11,160</del> <del>(Requesting \$1,395 reallocation from fringe benefits to CCP courses)</del>	<del>\$9,065</del> <del>\$11,160</del>
<del>PACE Continuing Education</del>	<del>Fee for joint sponsorship of continuing education units (CME) with Hollywood Presbyterian Medical Center \$1,000 per session x 4 = \$4,000</del>  <del>PACE master trainer for conducting seminar \$400/session x 4 session = (request to add \$6,000 from Director of Nursing salary to this line item)</del>	<del>\$4,000</del>  <del>—\$1,600</del>  <del>\$4,000</del> <del>\$500</del>
<u>Asthma Training Seminars</u>	<u>Speaker/trainer's fee session 1-(\$300 per hour)</u> <u>Preparation/development of content for seminar presentation and actual seminar time: 16 hours x300</u> <u>Subsequent seminars will account only for the seminar time; as preparation work is complete</u> <u>Session 2: (\$300/h x 3 hours):</u> <u>Session 3: (\$300/h x 3 hours):</u> <u>Session 4: (\$300/h x 3 hours):</u>	<u>\$4,800</u>     <u>\$2,700</u>

\*In November 2014,  
QHC asked to substitute  
the PACE training with a  
much more robust  
continuing asthma  
education seminar by a  
Johns Hopkins trained,

UCLA based pediatric pulmonologist. Our request was approved by J. Ospital, because the scope and aim of the trainings were the same.	<u>Dinner, Session 1, for seminar participants estimated at \$43.75 per participant x 46 participants</u>	<u>\$2,013</u>
	<u>Dinner, Session 2: \$43 x 50 participants</u>	<u>\$2,150</u>
	<u>Dinner, Session 3: \$43 x 50 participants</u>	<u>\$2,150</u>
	<u>Dinner, Session 4: \$43 x 50 participants</u>	<u>\$2,150</u>
	<del>PACE seminar materials \$5/manual x 100 = \$500</del>	<del>\$500</del>
	Presentation Materials/Agenda Printing	\$67
Environmental remediation supplies	Hypoallergenic mattress and pillow covers	\$2,000
	Zippered mattress covers \$25/each x 50=\$1,250	
	Standard size zippered pillow covers \$15/each x 50=\$750	
	Boric Acid \$5/each x 50 =\$250	
Educational materials and printing	Purchase of educational materials and printing costs for patient education, home visits etc.	<u>\$2,000</u>
		<u>\$372</u>
<b>Other Direct Costs Total</b>		<b><u>29,562</u></b>
<b>Grand Total for this request</b>		<b>\$238,641</b>

**Request for Reallocation June 2015**

Budget Line Item	Original Cost Proposal	First Year's Expenditures	Remaining Balance	Amount Requested for Reallocation	Remaining Budget	Requesting Reallocation to:	Justification for Reallocation
Salaries: Medical Supervisor	\$3,696	1,848	\$1,848	(\$1,848)	\$0	Biostatistician/Project Evaluation	Medical Supervisor's time has reduced dramatically
Salaries: Director of Nursing	\$6,000	0	\$6,000	(\$6,000)	\$0	PACE Continuing Education <b>Asthma Seminars</b> for primary Care Providers	The position of Director of Nursing has been eliminated; The asthma seminars thus far have cost more because of a higher than expected demand from primary care providers; therefore, we would like to add the \$6,000 to this line item to serve more clinicians
Fringe Benefits	\$48,988	\$24,492	\$24,496	(\$2,354)	\$22,142	1. CCP Certification Training (\$1,400) and 2. Biostatistician (\$954)	With the decrease in salaries, benefits too have decreased. We would like to use \$1,400 of these funds to train an additional Care Coordinator through CCP Certification and use \$954 toward a Biostatistician/Project Evaluation
Educational Materials	\$2,000	\$627.84	\$1,372.16	(\$1,000)	\$372.16	Biostatistician/Project Evaluation	We would like to reallocate \$1,000 of the original educational materials toward project evaluation. Our new electronic health record requires extensive build-up of asthma specific data points and measures and the time/cost projected have increased since the original cost proposal.
<b>Total</b>				<b>(\$11,202)</b>			

## Attachment 2

2601 Airport Drive, Suite 220  
Torrance, CA 90505  
t: 310-303-5086  
www.providence.org

### Community Health



March 18, 2015

BP/AQMD Public Benefits Oversight Committee  
Jean Ospital, Health Effects Officer  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765-4178

#### **RE: Providence Little Company of Mary COPA Program, Budget Revisions Justification**

Dear Mr. Ospital:

Providence Little Company of Mary Medical Centers requests a revision to their grant budget. Below are the amounts to be revised and justification for the requested revisions.

#### Reallocation of Unspent Funds from Year 1:

In Year 1, \$7,157 was not spent.

- Of this amount, \$3,970 was for the cost of the COPA Curriculum books, which were purchased in Year 1, but charged to the wrong cost center (internally) when the expense was made in September, 2013. So, that expenditure was not accounted for in the expenses from year 1 grant funds. The financials for the Fiscal Year ending December, 2013 have closed, so we are unable to go back and post this expense to the year it was made.

To rectify this, this expense is being reallocated to the correct cost center (BP/AQMD) in Year 2. The amount allocated for this line item in Year 1 (\$3,780) plus \$190 from this line item in Year 2, will cover the expense in full ( $\$3,780 + \$190 = \$3,970$ ).

No additional curriculum books are required in Year 2.

- We request to reallocate the remaining \$3,377 from year 1 ( $\$7,157 - \$3,780 = \$3,377$ ) to provide additional personnel/fringe benefits for the 2 PE Instructors in Year 2. The demand for PE Instructor hours has far exceeded our original expectations. The PE Instructors implement the afterschool program and are involved with the data collection process. The students, teachers, and staff enjoy the work the PE Instructors do and have requested more of their services during the school day. The PE Instructors are working to promote physical activity at recess and in the classroom.

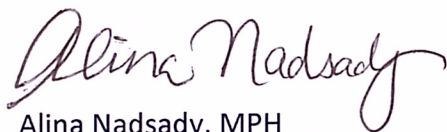
### Year 2 Budget Modifications

Projecting forward for the remainder of the grant period, we would like to request the following budget modifications in the Year 2. Line item reductions are shown in (parentheses).

- Personnel & Fringe Benefits: We would like to allocate the leftover funds from year 1, \$3,377, and an additional \$6,860 from year 2 (taken from other line items described below), for a total of \$10,237, towards PE Instructors' hours. As previously mentioned the demand for the PE Instructors services far exceeded expectations.
- Mileage (-\$950): Our mileage expenses are not as high as originally anticipated.
- Physical Activity Supplies (-\$500): This money was allocated to purchase equipment that was lost or damaged. Upon doing an inventory of current equipment in year 2, less replacement equipment was needed than anticipated.
- Indoor COPA curriculum (no change)
- Family Night Dinners (-\$500): The cost of Family Night Dinners was lower than originally anticipated.
- After School Snacks (-\$720): We were able to work with LAUSD to have the district provide free snacks as part of the free and reduced lunch program that these students qualify for.
- COPA Curriculum books (-\$3,590): As mentioned previously, no additional curriculum books needed to be purchased in year 2; \$190 of the funds from year 2 were used to cover the previous expense in full, leaving a balance of \$3,590 that will not be used.
- Parent Hour Guest Speakers (-\$600): We have been able to obtain free speakers from existing Providence staff and community stakeholders.

Please feel free to contact me if you have any questions or need further information regarding this request.

Best regards,



Alina Nadsady, MPH

Grants Manager

310-303-5084

[alina.nadsady@providence.org](mailto:alina.nadsady@providence.org)

**PROPOSED REVISED BUDGET**  
**Providence Little Company of Mary**  
**Creating Opportunities for Physical Activity (COPA)**  
**Detailed Budget & Budget Revision**

<b>BUDGET ITEM (For 2 schools)</b>	<b>Annual Salary</b>	<b>Time</b>	<b>Months</b>	<b>Amount Requested Year 1</b>	<b>Revised Budget Year 1 (actual expense)</b>	<b>Amount Requested Year 2</b>	<b>Revised Budget Year 2 (proposed)</b>	<b>TOTAL BUDGET REQUEST</b>	<b>TOTAL REVISED BUDGET</b>
<b>1. PERSONNEL</b>									
Project Supervisor*	\$66,000	10%	12	\$6,600	\$14,256	\$6,732	\$6,732	\$13,332	\$20,988
Physical Education (PE) Specialist	\$44,880	100%	10	\$44,880	\$41,801	\$45,778	\$45,778	\$90,658	\$87,579
PE Specialist	\$44,880	50%	10	\$22,440	\$8,415	\$22,889	\$22,889	\$45,329	\$31,304
PE Instructor	\$21,600	60%	30 wks	\$12,960	\$20,406	\$13,219	\$17,449	\$26,179	\$37,855
PE Instructor	\$21,600	60%	30 wks	\$12,960	\$19,931	\$13,219	\$17,449	\$26,179	\$37,380
Health Education Specialist	\$44,880	20%	10	\$8,976	\$2,771	\$9,156	\$9,156	\$18,132	\$11,927
Data Specialist	\$30,800	10%	12	\$3,080	\$4,617	\$3,142	\$3,142	\$6,222	\$7,759
Promotora	\$24,960		12	\$300	0	\$300	\$300	\$600	\$300
<i>Subtotal Personnel</i>				\$112,196	\$112,197	\$114,434	\$122,895	\$226,630	\$235,092
<b>2. FRINGE BENEFITS = 21% of salaries</b>				<b>\$23,561</b>	<b>\$23,561</b>	<b>\$24,031</b>	<b>\$25,808</b>	<b>\$47,592</b>	<b>\$49,369</b>
	<b>Cost/ Unit</b>	<b>Units/ Yr</b>							
<b>3. TRAVEL</b>									
Mileage	\$0.56	2500		\$1,388	516	\$1,388	\$438	\$2,775	\$954
<b>5. SUPPLIES</b>									
P.E./Physical Activity Supplies	\$2,000	2		\$4,000	\$3,560	\$1,000	\$500	\$5,000	\$4,060
Indoor COPA Curriculum	\$500	1		\$500	\$400	\$200	\$200	\$700	\$600
Family Night Dinner	\$280	6		\$1,680	\$966	\$1,680	\$1,180	\$3,360	\$2,146
After School Snacks (\$30/week)	\$30	24		\$720	\$66	\$720	\$0	\$1,440	\$66
COPA Curriculum Books	\$45	84		\$3,780	0	\$3,780	\$3,970	\$7,560	\$3,970

**PROPOSED REVISED BUDGET**

<b>6. CONTRACTUAL</b>									
"Parent Hour" Guest Speakers	\$100	6		\$600	0	\$600	\$0	<b>\$1,200</b>	<b>\$0</b>
<b>7. TOTAL DIRECT COSTS</b>				<b>\$148,425</b>	<b>\$141,266</b>	<b>\$147,833</b>	<b>\$154,991</b>	<b>\$296,257</b>	<b>\$296,257</b>
<b>8. TOTAL PROJECT BUDGET</b>				<b>\$148,425</b>	<b>\$141,266</b>	<b>\$147,833</b>	<b>\$154,991</b>	<b>\$296,257</b>	<b>\$296,257</b>



**DEPARTMENT OF PREVENTIVE MEDICINE**

April 22, 2015

Jean Ospital  
Health Effects Office  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765-4178



Dear Mr. Ospital:

I am writing about our BP/AQMD Community Benefits Award “NEW TOOLS FOR MAXIMIZING HEALTH AND ECONOMIC BENEFITS OF AIR POLLUTION REGULATION”. As a brief progress report, we have completed review of the relevant health literature for the project. We have estimated the current burden of ischemic heart disease mortality and hospitalization associated with near-roadway pollution exposure and with regional fine particulate exposure in the South Coast Air Quality Management District. We have obtained the planning projections from the Southern California Association of Governments (SCAG) for 2035 that are mandated by SB-375. We have used these data to estimate projected changes in population exposures to near-roadway and fine particulate pollution. We have completed estimation of the burden of disease of near-roadway and regional air pollution exposures associated with the planning scenario for 2035. A paper with these results has been provisionally accepted for publication in *Environmental Health Perspectives*, the highest impact environmental health journal.

We have another quite important paper published last year in the *Journal of Allergy and Clinical Immunology* (the highest impact allergy specialty journal), examining the cost of pollution-attributable asthma in Los Angeles County. This included the novel assessment of the near-roadway attributable cost of the burden of disease, which accounted for about half of the \$400m yearly cost.<sup>1</sup>

**Request for a no-cost extension**

There have been considerable challenges to this project, both scientific and operational that we have successfully managed. We have overcome challenges in identifying the appropriate growth scenario and variations of road networks in the 2035 SCAG land use projections and in obtaining useable population parcel level data sets, and we have dealt with inter-institutional delays in receiving a final contract and in approval for mid-contract re-budgeting needed to successfully complete the project. Now a key co-investigator has had to take a leave of absence to care for an ill family member and has recently approached me about an extension in the timeline that would allow us to complete the scope of work. This will have cost implications for analyst support for this scope of work. Therefore, as we have discussed, I am now requesting an additional no-cost extension through September of 2016 and permission to re-budget travel costs originally allocated for a scientific workshop into salary support, as specified in the attached detailed budget. We took advantage of the International Society for Environmental Epidemiology meeting in Seattle last summer to meet with many of the investigators doing work in this area internationally at a special session at which our work featured prominently. We still



intend to have the workshop at the conclusion of the project, but for participants not living in Southern California it will be conducted as a virtual forum using rapidly developing technology that has evolved even in the time since the proposal was written. We are confident that the workshop will be as useful as it would be in-person, and this approach will allow us to include additional investigators doing complementary and highly innovative research in Europe who could not possibly be accommodated in the original travel budget. This will allow optimal use of funds to guarantee that we will have analyses and final papers that will be in keeping with the quality of work you have come to expect from us.

As summarized above, we have been quite productive scientifically. In addition, we have made our results available to stakeholders through several other mechanisms, including press releases and interviews with media at the time papers have been published and presentations in scientific and policy forums (including several organized by AQMD). In July I will be a featured speaker at a forum with National Institute of Environmental Health Science director Linda Birnbaum at which I will present our AQMD-supported results.

I hope that the Public Benefits Oversight Committee will find these arguments convincing and will authorize an extension to the contract. Please let me know if there is anything further I should provide in order for the committee to evaluate the request.

Thanks. I hope you are well

Sincerely,



Rob McConnell  
Professor of Preventive Medicine



Jean Chan  
Associate Director  
Department of Contracts and Grants

1. Brandt S, Perez L, Künzli N, et al. Cost of near-roadway and regional air pollution–attributable childhood asthma in Los Angeles County. *Journal of Allergy and Clinical Immunology*. 2014;134(5):1028-1035.

**PROPOSED REVISED BUDGET**

					Rebudget April 2015	Current Approved Budget	VARIANCE
	IBS	%	Salary	FB			
Rob McConnell	208,803	15%	31,320	10,492	41,812	41,812	
Keyisha Dantzler	60,000	0%	-	-	-	-	
John Wilson	184,733	3%	5,130	1,719	6,849	6,849	
Maryam Taher	54,912	18%	9,884	3,311	13,195	13,195	
Post Doc	60,000	80%	47,744	15,994	63,738	48,060	15,678
			-	-		-	
<b>Fringe Benefits Rate:</b>	<b>33.5%</b>		<b>94,078</b>	<b>31,516</b>	<b>125,594</b>	<b>109,916</b>	
<b>Total Salary &amp; FB</b>				<b>125,594</b>			
<b>Materials and Supplies</b>							
Communications, Misc Supplies				775	775	775	
GIS Lab Cost				885	885	885	
Publication cost				1,360	1,360	1,360	
						-	
<b>Consultant</b>							
Nino Kunzli				10,000	10,000	10,000	
Laura Perez				10,000	10,000	10,000	
<b>Travel</b>							
				2,322	2,322	18,000	(15,678)
						-	
<b>Subcontract</b>							
Umass Amherst				40,467	40,467	40,467	
STI				79,981	79,981	79,981	
<b>Direct Costs</b>				<b>271,383</b>	<b>271,383</b>	<b>271,383</b>	
Consortium F&A				18,909	18,909	18,909	
						-	
<b>Total Direct Costs</b>				<b>290,292</b>	<b>290,292</b>	<b>290,292</b>	
<i>F &amp; A Base through 6/30/11</i>						-	
<i>F &amp; A Base - 7/1/11 to 6/30/12</i>						-	
<i>F &amp; A Base - 7/1/12 to 6/30/14</i>				200,935	200,935	200,935	
<i>F &amp; A Base - 7/1/14 to 6/30/15</i>						-	
<i>F &amp; A Base - Beyond 7/1/2015</i>						-	
<b>Indirect Costs (F &amp; A)</b>							
F & A through 06/30/2011				-		-	
F & A - 07/01/2011 to 06/30/2012				-		-	
F & A - 07/01/2012 to 06/30/2014	64.00%			128,599	128,599	128,599	
F & A - 07/01/2014 to 06/30/2015				-		-	
F&A - Beyond 07/1/2015				-		-	
<b>Total Indirect Costs</b>				<b>128,599</b>	<b>128,598</b>	128,599	
<b>TOTAL PROJECT COST</b>				<b>418,890</b>	<b>418,890</b>	<b>418,890</b>	

## Attachment 4



LONG BEACH ALLIANCE FOR CHILDREN WITH ASTHMA  
2651 Elm Ave. Suite 100 Long Beach, CA 90806  
(562) 933-5650 \* Fax (562) 427-8438  
[www.lbaCa.org](http://www.lbaCa.org)



May 20, 2015

Jean Ospital  
Health Effects Officer  
BP/AQMD Public Benefits Oversight Committee  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765-4178

Dr. Ospital,

The Long Beach Alliance for Children with Asthma respectfully requests a 3 month no-cost extension for our BP Settlement Funds. This is our Year 8, 4<sup>th</sup> and final Quarter. If approved, our new ending date will be July 31, 2015.

Currently, our balance is \$13,115. During year 8, we did not have a Program Manager for 6 months and one of our Community Health Workers retired, leaving a vacant position for 3 months. In the 3<sup>rd</sup> and 4<sup>th</sup> quarter of Year 8, we have been operating without an Assistant Project Manager for 3 months. We also provided only 1 PACE (Physician Asthma Care Education) training in 2014 because we were understaffed for outreach and coordination. This contributed to needing to ask for an extension.

In the next months, the remaining balance will be used to finalize our caseloads with currently enrolled families. We expect that our 2 Community Health Workers on this project will be making final home visits with families we've enrolled in recent months. In addition to their salary, mileage is compensated at the federal tax rate, which is .56 per mile driven. These resources for travel/mileage would be utilized for the 6 month (and final) visit to currently enrolled families.

Additionally, we plan to coordinate and offer 1 PACE training and 1 PACE Alumni training to physicians in our local area. PACE trainings are provided by physicians collaborating with LBACA. The curriculum is a multifaceted seminar to improve physician awareness, attitudes, ability and application of communication and therapeutic skills for asthma. These resources will be used to cover expenses for two contracted physicians, and for the meeting site, food, and materials.

Below, please find a budget reflecting the expected expenses for the remaining balance.

**Extension: May – July (three months)**

CHW salary (108 hours/month @ \$18)	\$5,845
Benefits (@ 32%)	\$1,870
Mileage (\$200 per month)	\$ 600
PACE Trainings (2):	
MD instructors	\$ 800
Meeting site/food	<u>\$4,000</u>
	\$13,115

Please contact me if you have any questions. Thank you for your consideration and continued support for our program.

Sincerely,

Sylvia Betancourt  
LBACA Project Manager  
Long Beach Alliance for Children with Asthma

**BP/AQMD PUBLIC BENEFITS OVERSIGHT COMMITTEE  
GRANT AWARD TERMS AND CONDITIONS**

**Project Budget  
Long Beach Alliance for Children with Asthma  
May 1, 2014-April 30, 2015**

<b>Personnel Expenses</b>	<b>Approved Budget</b>	<b>Requested Change</b>	<b>Proposed Revised Budget</b>
Project Director	\$0		
Project Manager	\$12,000	(\$2,101.16)	\$9,898.84
Assistant Project Coordinator	\$24,685	(\$3,052.68)	\$21,632.32
Part Time Office Manager & Evaluation Assistant- \$15/hr 2-hours/month	\$21,211	\$2,561.69	\$23,772.69
Community Health Workers	\$3,600	(\$1,020.60)	\$2,579.40
	\$108,828	(\$1,660.14)	\$107,167.86
	\$170,324	(\$5,272.89)	\$165,051.11
<i>Personnel Benefits - 32%</i>	\$43,452	\$9,363.84	\$52,815.84
<b>Subtotal</b>	<b>\$213,776</b>	<b>\$4,090.95</b>	<b>\$217,866.95</b>
<b>Direct Intervention Expenses</b>			
CPNP- \$45- 3 hours/month	\$1,620	(\$180.00)	\$1,440.00
MSW- \$45 -2 hours/month	\$1,080	\$360.00	\$1,440.00
Data/Evaluation- \$100/hr 7 hrs/month	\$8,400	(\$1,200.00)	\$7,200.00
<b>Subtotal</b>	<b>\$11,100</b>	<b>(\$1,020.00)</b>	<b>\$10,080.00</b>
<b>Supplies and Materials</b>			
Office Supplies	\$6,500	(\$2,865.61)	\$3,634.39
PACE (3) & MA (4) Training Stipends/Materials	\$7,100	\$512.49	\$7,612.49
Travel/Mileage	\$5,000	\$3,743.51	\$8,743.51
Program Incentives	\$4,800	(\$800.00)	\$4,000.00
Participant Home Visit Supplies	\$19,000	(\$2,669.92)	\$16,330.08
Cell Phones	\$2,160	(\$991.42)	\$1,168.58
<i>Supplies and Materials Subtotal</i>	<b>\$44,560</b>	<b>(\$3,070.95)</b>	<b>\$41,489.05</b>
<b>Subtotal Direct Intervention /Supplies</b>	<b>\$55,660</b>	<b>(\$4,090.95)</b>	<b>\$51,569.05</b>
<b>TOTAL PROGRAM EXPENSES</b>	<b>\$269,436</b>	<b>\$0.00</b>	<b>\$269,436.00</b>

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BOARD MEETING DATE: September 4, 2015

AGENDA NO. 15

**PROPOSAL:** Appropriate Funds from Designation for Litigation and Enforcement and Authorize Amending/Initiating Contracts with Outside Counsel and Specialized Legal Counsel and Services

**SYNOPSIS:** Legal is currently being assisted in environmental lawsuits by outside law firms and in other matters requiring specialized legal counsel and services, principally ongoing litigation with Exide Technologies, Inc. This action is to appropriate \$750,000 from the Designation for Litigation and Enforcement, to FY 2015-16 Legal Budget and amend or initiate contracts to expend these funds with prequalified counsel approved by the Board as well as specialized legal counsel and services.

**COMMITTEE:** Administrative, July 17, 2015; Less than a quorum was present; the Committee Members concurred that this item be approved by the Board.

**RECOMMENDED ACTIONS:**

1. Appropriate \$750,000 from the Designation for Litigation and Enforcement to Legal's FY 2015-16 Budget.
2. Increase Legal's FY 2015-16 Services and Supplies Major Object, Professional and Special Services account by \$750,000.
3. Authorize the Chairman or the Executive Officer, depending on whether the amount exceeds \$75,000, to amend or initiate contracts with prequalified counsel approved by the Board as well as specialized legal counsel and services in a total amount not to exceed \$1,029,500 in FY 2015-16, as the need arises.

Barry R. Wallerstein, D.Env.  
Executive Officer

**Background**

The FY 2015-16 Budget for Legal included \$279,500 for litigation expenses in environmental law cases and specialized legal counsel and services; however, this will not cover current and anticipated costs of legal counsel and specialized counsel and services. Due to the complexity of certain cases, particularly the Exide Technologies case, it is expected that expenses in these matters, and the other matters handled by specialized legal counsel and services, will require an additional amount up to \$750,000. In addition, monies will be expended on other lawsuits and legal proceedings, including a challenge to permitting a tank storage project at the Phillips 66 refinery in Carson—which will be reimbursed by Phillips 66 pursuant to Rule 301(aa) once the matter is completed. Accordingly, Legal is requesting the transfer of additional funds in the amount of \$750,000, for a total expected expenditure of \$1,029,500 this fiscal year.

**Proposal**

In order to defend ongoing and threatened litigation, it is necessary to appropriate additional funds for expenditure by outside counsel. It is expected that ongoing lawsuits as well as matters requiring specialized legal counsel will require an additional \$750,000 to be appropriated to prequalified counsel approved by the Board and with specialized legal counsel and services, as the need arises.

**Resource Impacts**

Sufficient funds will be available in Legal's FY 2015-16 Budget upon approval of this Board letter.





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BOARD MEETING DATE: September 4, 2015

AGENDA NO. 16

PROPOSAL: Approve Contract Awards and Allocation Approved by MSRC

SYNOPSIS: As part of their FYs 2014-16 AB 2766 Discretionary Fund Work Program, the MSRC approved 25 new contracts under the Local Government Program, a contract for programmatic outreach services for the MSRC, a sole-source contract under the Transportation Control Measure Partnership Program. The MSRC also approved a funding allocation towards the Residential Electric Vehicle Charging Incentive Pilot Program. As part of their FY 2011-12 Work Program, the MSRC approved a replacement contract with the City of Palm Springs to complete work initiated under an earlier contract. At this time the MSRC seeks Board approval of the contract awards and allocation.

COMMITTEE: Mobile Source Air Pollution Reduction Review, August 20, 2015, Recommended for Approval

**RECOMMENDED ACTIONS:**

1. Approve the award of 25 contracts totaling \$5,114,228 under the Local Government Match Program, as part of approval of the FYs 2014-16 AB 2766 Discretionary Fund Work Program, as described in this letter and as follows:
  - a. A contract with the City of Palm Springs in an amount not to exceed \$160,000 to purchase up to 4 heavy-duty natural gas vehicles, install bicycle racks, and conduct bicycle-related outreach;
  - b. A contract with the City of Cathedral City in an amount not to exceed \$80,000 to purchase one heavy-duty natural gas vehicle, conduct bicycle-related outreach, and street sweeping operations in the Coachella Valley;
  - c. A contract with the City of Culver City in an amount not to exceed \$246,000 for the purchase of up to 7 heavy-duty natural gas vehicles and the installation of electric vehicle (EV) charging infrastructure;
  - d. A contract with the City of Pomona in an amount not to exceed \$310,000 for the purchase of up to 4 medium-duty and up to 9 heavy-duty natural gas vehicles;
  - e. A contract with the City of Fountain Valley in an amount not to exceed \$46,100 to install EV charging infrastructure;

- f. A contract with the City of Fullerton in an amount not to exceed \$340,500 to expand their existing CNG fueling station and install EV charging infrastructure;
- g. A contract with the City of Claremont in an amount not to exceed \$90,000 to purchase up to 3 heavy-duty natural gas vehicles;
- h. A contract with the City of Carson in an amount not to exceed \$60,000 to purchase up to 2 heavy-duty natural gas vehicles;
- i. A contract with the City of Monterey Park in an amount not to exceed \$90,000 to purchase up to 3 heavy-duty natural gas vehicles;
- j. A contract with the City of Dana Point in an amount not to exceed \$153,818 to extend an existing Class 1 Bikeway;
- k. A contract with the City of Yorba Linda in an amount not to exceed \$85,000 to install bicycle lanes;
- l. A contract with the City of Los Angeles in an amount not to exceed \$630,000 to purchase up to 21 heavy-duty natural gas vehicles;
- m. A contract with the City of Long Beach in an amount not to exceed \$1,445,400 to purchase up to 48 medium-duty and up to 16 heavy-duty natural gas vehicles, and to install a new CNG fueling station;
- n. A contract with the City of Hermosa Beach in an amount not to exceed \$29,520 to purchase up to 2 medium-duty natural gas vehicles and conduct bicycle-related outreach;
- o. A contract with the City of Los Angeles in an amount not to exceed \$102,955 to install EV charging infrastructure;
- p. A contract with the City of Pomona in an amount not to exceed \$440,000 to install road surface bicycle detection systems;
- q. A contract with the City of Santa Clarita in an amount not to exceed \$49,400 to install EV charging infrastructure;
- r. A contract with the Los Angeles Department of Water and Power in an amount not to exceed \$390,000 to purchase up to 13 heavy-duty natural gas vehicles;
- s. A contract with the City of Banning in an amount not to exceed \$30,000 to purchase one heavy-duty natural gas vehicle;
- t. A contract with the City of Azusa in an amount not to exceed \$30,000 to purchase one heavy-duty natural gas vehicle;
- u. A contract with the City of South Pasadena in an amount not to exceed \$180,535 to purchase one heavy-duty natural gas vehicle and to expand their existing CNG fueling station;
- v. A contract with the City of Downey in an amount not to exceed \$40,000 to install EV charging infrastructure;
- w. A contract with the City of Whittier in an amount not to exceed \$30,000 to purchase one heavy-duty natural gas vehicle;
- x. A contract with the City of Fullerton in an amount not to exceed \$30,000 to install EV charging infrastructure; and
- y. A contract with the City of Azusa in an amount not to exceed \$25,000 to enhance an existing Class 1 Bikeway;

2. Approve a contract with The Better World Group in an amount not to exceed \$118,065 for programmatic outreach services to the MSRC for a two-year period as part of approval of the FYs 2014-16 AB 2766 Discretionary Fund Work Program (with an option clause for an additional two-year period, subject to approval in future by the MSRC and SCAQMD Board), as described in this letter;
3. Approve a sole-source contract award under the Transportation Control Measure Partnership Program to the Orange County Transportation Authority in an amount not to exceed \$943,643 for five bicycle-related projects, as part of approval of the FYs 2014-16 AB 2766 Discretionary Fund Work Program, as described in this letter;
4. Approve \$500,000 MSRC allocation for partnership with SCAQMD on implementation of a Residential EV Charging Incentive Pilot Program, with funding to support the cost of hardware for Level 2 residential chargers, as part of approval of the FYs 2014-16 AB 2766 Discretionary Fund Work Program, as described in this letter;
5. Approve a new/replacement contract with the City of Palm Springs, in an amount not to exceed \$21,163, for the installation of EV charging infrastructure , as part of approval of the FY 2011-12 AB 2766 Discretionary Fund Work Program;
6. Authorize MSRC the authority to adjust contract awards up to five percent, as necessary and previously granted in prior work programs; and
7. Authorize the Chairman of the Board to execute new and modified contracts under FY 2011-12 and FYs 2014-16 Work Programs, as described above and in this letter.

Larry McCallon,  
Vice Chair, MSRC

MM:HH:CR

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### **Background**

In September 1990 Assembly Bill 2766 was signed into law (Health & Safety Code Sections 44220-44247) authorizing the imposition of an annual \$4 motor vehicle registration fee to fund the implementation of programs exclusively to reduce air pollution from motor vehicles. AB 2766 provides that 30 percent of the annual \$4 vehicle registration fee subvended to the SCAQMD be placed into an account to be allocated pursuant to a work program developed and adopted by the MSRC and approved by the Board.

In November 2014, the MSRC selected initial categories for the FYs 2014-16 Work Program, with the understanding that additional project categories would continue to be developed and brought forward for consideration at a later date. At its August 20, 2015 meeting, the MSRC considered a recommended replacement contract and recommended awards under the Local Government Match and Transportation Control Measure CTC Partnership Programs, as well as a recommended award for programmatic outreach

services for the MSRC. In response to a partnership opportunity for the Residential EV Charging Incentive Pilot Program, the MSRC also considered a recommendation to make a new allocation under the FYs 2014-16 Work Program. Details are provided below in the Proposals section.

### **Outreach**

In accordance with SCAQMD's Procurement Policy and Procedure, public notices advertising the Local Government Match Program Announcement and Programmatic Outreach Services RFP were published in the Los Angeles Times, the Orange County Register, the San Bernardino Sun, and Riverside County Press Enterprise newspapers to leverage the most cost-effective method of outreach to the South Coast Basin. In addition, the Program Announcement and RFP were advertised in the Desert Sun newspaper for expanded outreach in the Coachella Valley.

Additionally, potential bidders may have been notified utilizing SCAQMD's own electronic listing of certified minority vendors. Notice of the solicitation was e-mailed to the Black and Latino Legislative Caucuses and various minority chambers of commerce and business associations, and placed on the Internet at SCAQMD's Website (<http://www.aqmd.gov>). Further, the solicitation was posted on the MSRC's website at <http://www.cleantransportationfunding.org> and electronic notifications were sent to those subscribing to this website's notification service.

### **Proposals**

At its August 20, 2015 meeting, the MSRC considered recommendations from its MSRC-TAC and approved the following:

#### **Local Government Match Program**

As an element of the FYs 2014-16 Work Program, the MSRC allocated \$13.0 million for the Local Government Match Program. A Program Announcement was developed and released on May 1, 2015. As in the previous Work Program, the Local Government Match Program offers to co-fund qualifying medium- and heavy-duty alternative fuel vehicles, alternative fuel infrastructure projects, electric vehicle charging infrastructure, and regional street sweeping in the Coachella Valley. The bicycle projects category was expanded to "active transportation", and commercial zero emission riding lawnmowers were added as a new category. In all categories funding is provided on a dollar-for-dollar match basis, and funding for all eligible entities shall be distributed on a first-come, first-served basis with a geographic minimum per county of \$1.625 million. The Program Announcement includes an open application period commencing June 2, 2015 and closing September 4, 2015. Twenty-six applications requesting a total of \$5,216,378 were received prior to the July 29, 2015 MSRC-TAC Local Match Subcommittee meeting. For one application, the Subcommittee, and subsequently the MSRC-TAC, recommended that the MSRC defer action while additional information is sought. The MSRC approved 25 applications totaling \$5,114,228 as part of the FYs 2014-16 AB 2766 Discretionary Fund Work Program, as follows:

- a. A contract with the City of Palm Springs in an amount not to exceed \$160,000 to purchase up to 4 heavy-duty natural gas vehicles, install bicycle racks, and conduct bicycle-related outreach;
- b. A contract with the City of Cathedral City in an amount not to exceed \$80,000 to purchase one heavy-duty natural gas vehicle, conduct bicycle-related outreach, and street sweeping operations in the Coachella Valley;
- c. A contract with the City of Culver City in an amount not to exceed \$246,000 for the purchase of up to 7 heavy-duty natural gas vehicles and the installation of electric vehicle (EV) charging infrastructure;
- d. A contract with the City of Pomona in an amount not to exceed \$310,000 for the purchase of up to 4 medium-duty and up to 9 heavy-duty natural gas vehicles;
- e. A contract with the City of Fountain Valley in an amount not to exceed \$46,100 to install EV charging infrastructure;
- f. A contract with the City of Fullerton in an amount not to exceed \$340,500 to expand their existing CNG fueling station and install EV charging infrastructure;
- g. A contract with the City of Claremont in an amount not to exceed \$90,000 to purchase up to 3 heavy-duty natural gas vehicles;
- h. A contract with the City of Carson in an amount not to exceed \$60,000 to purchase up to 2 heavy-duty natural gas vehicles;
- i. A contract with the City of Monterey Park in an amount not to exceed \$90,000 to purchase up to 3 heavy-duty natural gas vehicles;
- j. A contract with the City of Dana Point in an amount not to exceed \$153,818 to extend an existing Class 1 Bikeway;
- k. A contract with the City of Yorba Linda in an amount not to exceed \$85,000 to install bicycle lanes;
- l. A contract with the City of Los Angeles in an amount not to exceed \$630,000 to purchase up to 21 heavy-duty natural gas vehicles;
- m. A contract with the City of Long Beach in an amount not to exceed \$1,445,400 to purchase up to 48 medium-duty and up to 16 heavy-duty natural gas vehicles, and to install a new CNG fueling station;
- n. A contract with the City of Hermosa Beach in an amount not to exceed \$29,520 to purchase up to 2 medium-duty natural gas vehicles and conduct bicycle-related outreach;
- o. A contract with the City of Los Angeles in an amount not to exceed \$102,955 to install EV charging infrastructure;
- p. A contract with the City of Pomona in an amount not to exceed \$440,000 to install road surface bicycle detection systems;
- q. A contract with the City of Santa Clarita in an amount not to exceed \$49,400 to install EV charging infrastructure;
- r. A contract with the Los Angeles Department of Water and Power in an amount not to exceed \$390,000 to purchase up to 13 heavy-duty natural gas vehicles;
- s. A contract with the City of Banning in an amount not to exceed \$30,000 to purchase one heavy-duty natural gas vehicle;

- t. A contract with the City of Azusa in an amount not to exceed \$30,000 to purchase one heavy-duty natural gas vehicle;
- u. A contract with the City of South Pasadena in an amount not to exceed \$180,535 to purchase one heavy-duty natural gas vehicle and to expand their existing CNG fueling station;
- v. A contract with the City of Downey in an amount not to exceed \$40,000 to install EV charging infrastructure;
- w. A contract with the City of Whittier in an amount not to exceed \$30,000 to purchase one heavy-duty natural gas vehicle;
- x. A contract with the City of Fullerton in an amount not to exceed \$30,000 to install EV charging infrastructure; and
- y. A contract with the City of Azusa in an amount not to exceed \$25,000 to enhance an existing Class 1 Bikeway;

#### Programmatic Outreach Services

As part of the FYs 2014-16 Work Program, the MSRC released a Request for Proposals for the solicitation of Programmatic Outreach Services. The RFP established a funding target level not to exceed \$120,000 for an initial two-year period, with an option clause for another two-year period. The selected contractor would assist in promoting the MSRC's **Clean Transportation Funding**<sup>TM</sup> programs as well as providing outreach assistance to current and prospective MSRC project implementers. The RFP was released on May 1, 2015. A total of five applications were received by the closing date on June 17, 2015. The top three ranked proposals were interviewed by a panel comprised of members of the MSRC's Technical Advisory Committee. The MSRC approved a contract award to the Better World Group in an amount not to exceed \$118,065 for the base two-year period as part of the FYs 2014-16 AB 2766 Discretionary Fund Work Program, with an option clause for an additional two-year period subject to approval by the MSRC and SCAQMD Board at a later date.

#### Transportation Control Measure Partnership Program

As part of the FYs 2014-16 Work Program, the MSRC allocated \$10.0 million for a program to partner with cities, County Transportation Commissions (CTCs) and others to demonstrate transportation control measure (TCM) projects. Innovative TCM projects have potential to reduce significant numbers of automobile trips or remove impediments to efficient traffic flow. The program is intended to provide a portion of the funding for projects, which when combined with other funding sources would accelerate the projects' implementation. Because CTCs typically solicit and co-fund the majority of TCM projects within their respective jurisdictions, the MSRC determined that CTCs would have the best overall perspective regarding the need for TCMs within their respective regions as well as knowledge of where funding can most effectively be applied. Therefore, the MSRC asked CTCs to bring forward work plans proposing projects for funding. Other interested entities would then participate in the projects via separate agreements with the CTCs.

One work plan has been received to date, from Orange County Transportation Authority (OCTA). As part of the FYs 2014-16 AB 2766 Discretionary Fund Work Program, the MSRC approved the award of a contract not to exceed \$943,643 to OCTA to co-fund five active transportation projects: City of Irvine Freeway Trail Lighting Improvements; City of Cypress Cerritos Avenue Bike Corridor Improvements; City of La Habra Union Pacific Rail Line Bikeway; City of San Juan Capistrano Bikeway Gap Closure; and County of Orange Lambert Road Bikeway Project.

#### Residential EV Charging Incentive Pilot Program

In a separate item at its September 4, 2015 meeting, the SCAQMD Board will be considering the implementation of a Residential EV Charging Incentive Pilot Program. This Program is intended to offset electric vehicle charging hardware costs by issuing rebates to program participants installing Level 2 chargers at residences. The Program will be implemented on a first-come, first-served basis and will cover up to \$250 for the cost of hardware for all eligible applicants residing within the geographical boundaries of SCAQMD, with an additional incentive of up to \$250 available for lower income residents. The Program is designed not to be duplicative with other incentive programs offered by electric utilities, and SCAQMD will ensure that participants do not receive an incentive, or combination of incentives, that exceed the actual hardware cost.

SCAQMD staff initiated discussions with MSRC staff regarding potential partnership in the Program. As the Program will assist in accelerating deployment of EVs, it is consistent with the MSRC's goals and objectives to reduce motor vehicle emissions. SCAQMD staff would provide the majority of Program administration. The MSRC considered this partnership opportunity and approved an allocation totaling \$500,000 towards the Residential EV Charging Incentive Pilot Program as an element of the FYs 2014-16 AB 2766 Discretionary Fund Work Program.

#### Replacement Contract for City of Palm Springs

As part of the FY 2011-12 Work Program, the MSRC awarded the City of Palm Springs \$38,000 towards the installation of six EV charging stations. The City was subsequently able to obtain additional support from the California Energy Commission, and the MSRC approved a modification allowing the City to use the balance of MSRC funds to install additional stations, requiring the installation of at least 35 stations altogether. By June 2015, 34 stations had been installed and placed into service. Concerns were raised about the contract's lack of specificity in the number of stations. Before those concerns could be resolved, the original contract terminated. The City has since finalized their plans and proposes to install one additional station, of the "DC Fast Charge" variety. The MSRC considered and approved a 72-month replacement contract in the amount of \$21,163 as part of the FY 2011-12 AB 2766 Discretionary Fund Work Program.

At this time, the MSRC requests the SCAQMD Board to approve the contract awards as part of approval of the FY 2011-12 and FYs 2014-16 AB 2766 Discretionary Fund Work Program as outlined above. The MSRC also requests the Board to authorize the SCAQMD Chairman of the Board the authority to execute all agreements described in

this letter. The MSRC further requests authority to adjust the funds allocated to each project specified in this Board letter by up to five percent of the project's recommended funding. The Board has granted this authority to the MSRC for all past Work Programs.

### **Sole-Source Justification**

As an element of its FYs 2014-16 Work Program, the MSRC allocated \$10 million for a program to partner on TCM projects. As discussed in Proposals above, this project will be implemented by initiating sole-source contracts with CTCs. While the MSRC and SCAQMD strive to retain technical services on a competitive basis, the SCAQMD's Procurement Policy and Procedure recognizes that, at times, the required services are available from only one source, making the pursuit of a competitive procurement futile. OCTA solicits and co-funds TCM projects within its subregion of the SCAQMD jurisdiction. Thus, OCTA has a unique perspective regarding the state of TCMs within its region as well as knowledge of where funding can most effectively be applied.

This request for a sole source award to OCTA is made under provision VIII.B.2.c.(1): The desired services are available from only the sole source due to the unique experience and capabilities of the proposed contractor or contractor team.

### **Resource Impacts**

The SCAQMD acts as fiscal administrator for the AB 2766 Discretionary Fund Program (Health & Safety Code Section 44243). Money received for this program is recorded in a special revenue fund (Fund 23) and the contracts specified herein, as well as any contracts awarded in response to the solicitation, will be drawn from this fund.



BOARD MEETING DATE: September 4, 2015

AGENDA NO. 17

PROPOSAL: Legislative and Public Affairs Report

SYNOPSIS: This report highlights the June and July 2015 outreach activities of Legislative and Public Affairs, which include: an Environmental Justice Update, Community Events/Public Meetings, Business Assistance, and Outreach to Business and Federal, State, and Local Government.

COMMITTEE: No Committee Review

RECOMMENDED ACTION:  
Receive and file.

Barry R. Wallerstein, D.Env.  
Executive Officer

LBS:DJA:MC:DM:jns:jf

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## **BACKGROUND**

This report summarizes the activities of Legislative and Public Affairs for June and July 2015. The report includes four major areas: Environmental Justice Update; Community Events/Public Meetings (including the Speakers Bureau/Visitor Services, Communications Center, and Public Information Center); Business Assistance; and Outreach to Business and Federal, State and Local Governments.

## **ENVIRONMENTAL JUSTICE UPDATE**

The following are key environmental justice-related activities in which SCAQMD staff participated during the months of June and July. These events involve communities that may suffer disproportionately from adverse air quality impacts.

### June 4

- Staff assisted with the working group meeting for Proposed Rule (PR) 415 related to odors from rendering facilities by conducting outreach to stakeholders, community members, elected officials, and health and environmental organizations, as well as organizing and providing logistical support.

### June 11

- Staff assisted with the Exide Technologies Advisory Group meeting with the Department of Toxic Substances Control (DTSC) at Maywood Academy High School. Staff coordinated meeting logistics with DTSC and provided support during the meeting.

### June 17

- Staff represented SCAQMD at the Riverside County Health Coalition meeting and provided a timeline of upcoming community meeting update dates for the 2016 Air Quality Management Plan.
- SCAQMD and the Center for Community Action and Environmental Justice (CCA EJ) co-hosted a community meeting on “Children’s Health & Air Pollution” at Mira Loma Middle School in Jurupa Valley. The meeting was the inaugural SCAQMD Environmental Justice Community Partnership event that included presentations on two recent children’s health studies related to air pollution and an opportunity for attendees to ask a local medical expert about health issues impacted by air pollution.
- Staff led a group of SCAQMD interns on an environmental justice tour in San Bernardino and Riverside counties. The tour highlighted key air quality related issues impacting communities such as near-roadway pollutant exposure, land-use issues, and goods movement.

### June 18

- Staff participated in the Healthy San Bernardino meeting providing updates on SCAQMD programs, and information on wildfire and smoke alerts due to the current fire in San Bernardino.

### June 30

- Staff assisted with outreach and logistics for the PR 415 Public Consultation meeting related to odors from rendering facilities as well as provided support and assisted community members and stakeholders during the meeting.

### July 22

- Staff represented SCAQMD at the Riverside County Community Health Workshop in Moreno Valley and participated in discussions on air pollution and health issues related to the Riverside County community.

### July 23

- Staff assisted with logistics and outreach for the Exide Technologies Advisory Group meeting held in Maywood, which provided advisory group members and residents an update on the clean-up of Exide Technologies in Vernon, as well as information on the testing and clean-up of residences.

## **COMMUNITY EVENTS/PUBLIC MEETINGS**

Each year, thousands of residents engage in valuable information exchanges through events and meetings that SCAQMD sponsors either alone or in partnership with others. Attendees typically receive the following information:

- Tips on reducing their exposure to smog and its health effects;
- Clean air technologies and their deployment;
- Invitations or notices of conferences, seminars, workshops and other public events;
- Ways to participate in SCAQMD's rule and policy development; and
- Assistance in resolving air pollution-related problems.

SCAQMD staff attended and/or provided information and updates at the following events:

### June 5

- La Mirada High School Event
- Environmental Charter High School Earth Carnival, Lawndale

### June 11

- 24<sup>th</sup> Annual Western Riverside Council of Governments General Assembly Meeting, Morongo Casino Resort & Spa, Cabazon

### June 18

- SCAQMD Community meeting related to Hixson Metal Finishing, Hoag Conference Center, Newport Beach

### June 25

- Coachella Valley Association of Governments General Assembly meeting, Desert Willow Golf Course, Palm Desert

### July 18

- West Long Beach Garfield Elementary School Resource Fair, Garfield Elementary School, Long Beach
- American Cancer Society Relay for Life Event, South Gate Park, South Gate.

### July 19

- Green Living Expo/Clean Air Car Show and Summer Concert in the Park, Garfield Park, South Pasadena

### July 23

- Exide Technologies Advisory Group meeting held by SCAQMD and DTSC at Resurrection Church, Los Angeles

### **SPEAKERS BUREAU/VISITOR SERVICES**

SCAQMD regularly receives requests for staff to speak on air quality-related issues from a wide variety of organizations, such as trade associations, chambers of commerce, community-based groups, schools, hospitals and health-based organizations. SCAQMD also hosts visitors from around the world who meet with staff on a wide range of air quality issues.

### June 4

- Thirty-five students from the Center for Process Studies at the Claremont School of Theology visited SCAQMD headquarters where they were provided with an overview on the agency and air quality and given a tour of the laboratory.
- Staff provided an overview on the agency and demonstrated how air quality impacts the community to 100 students at Today's Fresh Start Charter School in Los Angeles.

### June 9-12

- Staff presented information on permitting enforcement and gave a tour of the facility to Dr. Min Zhao, a professor of dermatology at the UC Davis School of Medicine, while he was attending an AQMP Symposium held at SCAQMD Headquarters.

### July 9

- Two representatives from the Taiwan Environmental Protection Agency in China visited SCAQMD headquarters and were provided an overview on the agency, air quality, and toured the laboratory.

### July 15

- Six representatives from the Beijing Municipal Research Institute of Environmental Protection in China visited SCAQMD headquarters and toured the laboratory, and SCAQMD's air monitoring station site in Rubidoux.

### July 24

- A member of the public from Orange County visited SCAQMD headquarters and was provided an overview on the agency, air quality, and toured the laboratory.
- Sixteen students from a California State University, Fullerton Graduate Health and Public Policy class visited SCAQMD headquarters and were provided an overview on the agency, as well as a tour of the laboratory and SCAQMD's clean alternative fuel vehicles.

July 31

- Two representatives from Congressman Ed Royce’s Office visited SCAQMD headquarters and were provided an overview on the agency, and the region’s local air quality issues as well as a tour of the laboratory and SCAQMD’s clean alternative fuel vehicles.

**COMMUNICATION CENTER STATISTICS**

The Communication Center handles calls on the SCAQMD main line, 1-800-CUT-SMOG<sup>®</sup> line, the Spanish line, and after hours calls to each of those lines. Calls received in the months of June and July 2015 were:

Calls to SCAQMD’s Main Line and the 1-800-CUT-SMOG <sup>®</sup> Line	7,577
Calls to SCAQMD’s Spanish-language Line	<u>79</u>
Total Calls	7,656

**PUBLIC INFORMATION CENTER STATISTICS**

The Public Information Center (PIC) handles phone calls and walk-in requests for general information. Information for the months of June and July is summarized below:

Calls Received by PIC Staff	325
<u>Calls to Automated System</u>	<u>2,308</u>
Total Calls	2,633
Visitor Transactions	504
E-Mail Advisories Sent	2,677,042

**BUSINESS ASSISTANCE**

SCAQMD notifies local businesses of proposed regulations so they can participate in the agency’s rule development process. SCAQMD also works with other agencies and governments to identify efficient, cost-effective ways to reduce air pollution and shares that information broadly. Staff provides personalized assistance to small businesses both over the telephone and via on-site consultation. The information is summarized below:

- Conducted three free on-site consultations
- Provided permit application assistance to 125 companies
- Issued 62 clearance letters

**Types of businesses assisted**

Architecture	Engineering	Manufacturers
Auto Body Shops	Food Production	Medical Facilities
Cabinet Manufacturer	Foundry	Metal Coatings/Processing Facilities
Coffee Roasting	Gas Stations	Recycling Facilities
Construction	Grocery	Restaurants
Dry Cleaners	Hotels	

**OUTREACH TO COMMUNITY GROUPS AND FEDERAL, STATE, AND LOCAL GOVERNMENTS**

Field visits and/or communications were conducted with elected officials or staff from the following cities:

Arcadia	Lake Elsinore	Rialto
Azusa	Laguna Woods	Riverside
Anaheim	La Cañada Flintridge	Rosemead
Alhambra	Los Angeles	San Bernardino
Aliso Viejo	Los Alamitos	San Gabriel
Banning	Maywood	San Marino
Beaumont	Menifee	San Jacinto
Bell	Mission Viejo	Stanton
Buena Park	Montebello	South Gate
Chino	Monterey Park	South Pasadena
Colton	Moreno Valley	Temecula
Corona	Murrieta	Tustin
Costa Mesa	Newport Beach	Villa Park
Commerce	Norco	West Covina
Duarte	Pasadena	Walnut
Fountain Valley	Perris	Wildomar
Hemet	Pomona	Yucaipa

Visits and/or communications were conducted with elected officials or staff from the following State and Federal Offices:

- U.S. Senator Barbara Boxer
- U.S. Congresswoman Lucille Roybal-Allard
- U.S. Congressman Xavier Becerra
- U.S. Congressman Ken Calvert
- U.S. Congresswoman Judy Chu
- U.S. Congressman Duncan Hunter
- U.S. Congressman Ed Royce
- U.S. Congressman Mark Takano
- State Senator Joel Anderson

- State Senator Kevin De León
- State Senator Ed Hernandez
- State Senator Ricardo Lara
- State Senator Carol Liu
- State Senator Mike Morrell
- State Senator Richard Roth
- State Senator Jeff Stone
- Assembly Member Ed Chau
- Assembly Member Chris Holden
- Assembly Member Brian Jones
- Assembly Member Eric Linder
- Assembly Member Chad Mayes
- Assembly Member Jose Medina
- Assembly Member Melissa Melendez
- Assembly Member Anthony Rendon
- Assembly Member Miguel Santiago
- Assembly Member Marie Waldron

Staff represented SCAQMD and/or provided updates or a presentation to the following governments and business organizations:

Alhambra Chamber of Commerce  
 Arcadia Chamber of Commerce  
 Association of California Cities, Orange County  
 Barrios Planners Incorporated, Los Angeles  
 Big Bear Chamber of Commerce  
 California Department of Transportation (Caltrans)  
 California Regional Environmental Education Community  
 Carson Chamber of Commerce  
 Corona Chamber of Commerce  
 Claremont Chamber of Commerce  
 El Segundo Chamber of Commerce  
 Five Mountain Communities Government Affairs Council, San Bernardino County  
 Garden Valley Chamber of Commerce  
 Gateway Cities Council of Governments  
 Greater Riverside Chamber of Commerce  
 Harbor City/Harbor Gateway Chamber of Commerce  
 Hawthorne Chamber of Commerce  
 Hemet/San Jacinto Chamber of Commerce  
 Hermosa Beach Chamber of Commerce  
 Inglewood Airport Area Chamber of Commerce  
 Lawndale Chamber of Commerce  
 LAX Coastal Chamber of Commerce

League of California Cities  
 Los Angeles Regional Water Control Board  
 Lomita Chamber of Commerce  
 Manhattan Beach Chamber of Commerce  
 Montclair Chamber of Commerce  
 Moreno Valley Chamber of Commerce  
 One LA Industrial Areas Foundation  
 Palos Verdes Peninsula Chamber of Commerce  
 Quemetco, City of Industry  
 Redlands Chamber of Commerce  
 Redondo Beach Chamber of Commerce  
 Riverside County Fleet Services  
 San Bernardino Chamber of Commerce  
 San Bernardino Associated Governments  
 San Gabriel Valley Economic Partnership  
 San Gabriel Valley Council of Governments  
 San Pedro Chamber of Commerce  
 South Bay Association Chamber of Commerce  
 South Bay Area Chambers of Commerce  
 South Bay Service Council  
 South Bay Cities Council of Governments  
 South Pasadena Chamber of Commerce  
 Southern California Association of Governments  
 Southwest California Legislative Council
 

- Menifee Valley Chamber of Commerce
- Murrieta Chamber of Commerce
- Temecula Chamber of Commerce
- Lake Elsinore Chamber of Commerce
- Wildomar Chamber of Commerce
- Perris Valley Chamber of Commerce

 Torrance Chamber of Commerce  
 U.S. Chambers of Commerce, Western Region Managers  
 Western Riverside Council of Governments  
 Western Riverside Transportation NOW (RTA)
 

- Greater Riverside Chapter, Riverside
- Hemet/San Jacinto Chapter
- Moreno Valley/Perris Chapter
- San Geronio Pass Chapter, Beaumont
- Southwest Chapter, Wildomar
- Northwest Chapter, Corona

 Wilmington Chamber of Commerce  
 Yucaipa Valley Chamber of Commerce



Staff represented SCAQMD and/or provided updates or a presentation to the following community groups and organizations:

American Lung Association, Inland Counties  
Boyle Heights Neighborhood Council  
East Yard Communities for Environmental Justice, Commerce  
Eaton Canyon Nature Center, Pasadena  
El Segundo Joslyn Community Center  
Hermosa Beach Community Center  
La Mirada High School  
Manhattan Beach Joslyn Community Center  
Manhattan Heights Community Center  
Mothers of East Los Angeles  
Resurrection Church, Los Angeles  
Riverside County Health Coalition  
Sierra Club, Pasadena  
St. Rose of Lima Catholic Church, Maywood  
University of Southern California  
University of California, Riverside  
Union de Vecinos, Los Angeles  
Westside Regional Alliance of Councils, Los Angeles County

- Bel-Air Beverly Crest Neighborhood Council
- Brentwood Community Council
- Del Rey Neighborhood Council
- Mar Vista Community Council
- Neighborhood Council of Westchester-Playa
- Pacific Palisades Community Council
- Palms Neighborhood Council
- South Robertson Neighborhood Council
- Venice Neighborhood Council
- West LA Neighborhood Council
- Westside Neighborhood Council
- Westwood Community Council
- Westwood Neighborhood Council

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BOARD MEETING DATE: September 4, 2015

AGENDA NO. 18

REPORT: Hearing Board Report

SYNOPSIS: This reports the actions taken by the Hearing Board during the period of June 1 through July 31, 2015.

COMMITTEE: No Committee Review

RECOMMENDED ACTION:  
Receive and file this report.

Edward Camarena  
Chairman of Hearing Board

SM

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Three summaries are attached: **Rules From Which Variances and Orders for Abatement Were Requested in 2015** and **June 2015 and July 2015 Hearing Board Cases**.

The total number of appeals filed during the period June 1 to July 31, 2015 is 1; and total number of appeals filed during the period of January 1 to July 31, 2015 is 1.

Rules from which Variances and Order for Abatements were Requested in 2015														
	2015	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total Actions
<b># of HB Actions Involving Rules</b>														
109														0
109(c)														0
109(c)(1)														0
201														0
201.1														0
202														0
202(a)		1			1		1							3
202(b)														0
202(c)														0
203			1											1
203(a)		1	1			3								5
203(b)		5	2	7	4	3	6	5						32
204														0
208														0
218(c)(1)(B)(i)				1										1
218.1														0
218.1(b)(4)(C)				1										1
218(b)(2)						1								1
218(c)(1)(A)														0
218(d)(1)(A)														0
218(d)(1)(B)														0
219														0
219(s)(2)		1												1
221(b)		1												1
221(c)														0
221(d)		1												1
222			1											1
222(d)(1)(C)														0
222(e)(1)														0
401														0
401(b)														0
401(b)(1)														0
401(b)(1)(A)														0
401(b)(1)(B)														0
402		1						1						2
403(d)(1)														0
403(d)(1)(A)														0
403(d)(2)														0
404														0
404(a)														0
405														0
405(a)														0
405(b)														0
405(c)														0
407(a)														0
407(a)(1)														0
407(a)(2)(A)														0

Rules from which Variances and Order for Abatements were Requested in 2015														
	2015	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total Actions
410(d)														0
430(b)(3)(A)(iv)														0
431.1														0
431.1														0
431.1(c)(1)														0
431.1(c)(2)														0
431.1(c)(3)(C)														0
431.1(d)(1)														0
431.1(d)(1), Att A(1)														0
442														0
444														0
444(a)														0
444(c)														0
444(d)														0
461						1								1
461(c)(1)														0
461(c)(1)(A)														0
461(c)(1)(B)														0
461(c)(1)(C)														0
461(c)(1)(E)														0
461(c)(1)(F)(i)														0
461(c)(1)(F)(iv)														0
461(c)(1)(F)(v)														0
461(c)(1)(H)														0
461(c)(2)														0
461(c)(2)(A)														0
461(c)(2)(B)														0
461(c)(2)(C)														0
461(c)(3)														0
461(c)(3)(A)														0
461(c)(3)(B)														0
461(c)(3)(C)														0
461(c)(3)(D)(ii)														0
461(c)(3)(E)														0
461(c)(3)(H)														0
461(c)(3)(M)														0
461(c)(4)(B)														0
461(c)(4)(B)(ii)														0
461(d)(5)(A)														0
461(e)(1)														0
461(e)(2)				1										1
461(e)(2)(A)														0
461(e)(2)(A)(i)														0
461(e)(2)(B)(i)														0
461(e)(2)(C)														0
461(e)(3)														0
461(e)(3)(A)														0
461(e)(3)(C)(i)(l)														0

Rules from which Variances and Order for Abatements were Requested in 2015														
	2015	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total Actions
461(e)(3)(D)														0
461(e)(3)(E)														0
461(e)(5)														0
461(e)(7)														0
462														0
462(c)(4)(B)(i)														0
462(c)(7)(A)(ii)														0
462(d)														0
462(d)(1)														0
462(d)(1)(A)														0
462(d)(1)(A)(i)														0
462(d)(1)(B)														0
462(d)(1)(C)														0
462(d)(1)(E)(ii)														0
462(d)(1)(F)														0
462(d)(1)(G)														0
462(d)(5)														0
462(e)(1)														0
462(e)(1)(E)														0
462(e)(1)(E)(ii)														0
462(e)(1)(E)(i)(II)														0
462(e)(2)(A)(i)														0
462(e)(4)														0
462(h)(1)														0
463														0
463(c)														0
463(c)(1)														0
463(c)(1)(A)(I)-(iv)														0
463(c)(1)(B)														0
463(c)(1)(C)														0
463(c)(1)(D)														0
463(c)(1)(E)														0
463(c)(2)														0
463(c)(2)(B)														0
463(c)(2)(C)														0
463(c)(3)														0
463(c)(3)(A)														0
463(c)(3)(B)														0
463(c)(3)(C)														0
463(d)														0
463(d)(2)														0
463(e)(3)(C)														0
463(e)(4)														0
463(e)(5)(C)														0
464(b)(1)(A)														0
464(b)(2)														0
468														0
468(a)														0

Rules from which Variances and Order for Abatements were Requested in 2015														
	2015	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total Actions
468(b)														0
1102														0
1102(c)(2)														0
1102(e)(1)						1								1
1102(f)(1)						1								1
1105.1														0
1105.1(d)(1)(A)(i)														0
1105.1(d)(1)(A)(iii)														0
1106(c)(1)														0
1106.1(c)(1)														0
1106.1(c)(1)(A)														0
1107(c)(1)														0
1107(c)(2)														0
1107(c)(7)														0
1107														0
1110.1														0
1110.2			1											1
1110.2(c)(14)														0
1110.2(d)														0
1110.2(d)(1)(A)														0
1110.2(d)(1)(B)														0
1110.2(d)(1)(B)(ii)		1												1
1110.2(d)(1)(D)														0
1110.2(d)(1)(E)														0
1110.2(e)(1)(A)														0
1110.2(e)(1)(B)(i)(II)														0
1110.2(e)(1)(B)(i)(III)														0
1110.2(e)(4)(B)														0
1110.2(f)														0
1110.2(f)(1)(A)														0
1110.2(f)(1)(c)														0
1113(c)(2)														0
1113(d)(3)														0
1118(c)(4)														0
1118(c)(5)														0
1118(d)(1)(2)														0
1118(d)(1)(2)														0
1118(d)(2)														0
1118(d)(3)														0
1118(d)(4)(B)														0
1118(d)(5)(A)														0
1118(d)(5)(B)														0
1118(d)(10)														0
1118(d)(12)														0
1118(e)														0
1118(f)(1)(C)		1												1
1118(g)(3)					1									1
1118(g)(5)														0

Rules from which Variances and Order for Abatements were Requested in 2015														
	2015	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total Actions
1118(g)(5)(A)					1									1
1118(i)(5)(B)(i)														0
1118(i)(5)(B)(ii)														0
1118(j)(1)(A)(ii)														0
1118(j)(1)(B)(ii)														0
1118(j)(1)(C)														0
1121(c)(2)(C)														0
1121(c)(3)														0
1121(c)(6)														0
1121(c)(7)														0
1121(c)(8)														0
1121(e)(3)														0
1121(h)														0
1121(h)(1)														0
1121(h)(2)														0
1121(h)(3)														0
1122(c)(2)(A)														0
1122(c)(2)(E)														0
1122(d)(1)(A)														0
1122(d)(1)(B)														0
1122(d)(3)														0
1122(e)(2)(A)														0
1122(e)(2)(B)														0
1122(e)(2)(C)														0
1122(e)(2)(D)														0
1122(e)(3)														0
1122(e)(4)(A)														0
1122(e)(4)(B)														0
1122(g)(3)														0
1122(j)														0
1124														0
1124(c)(1)(A)														0
1124(c)(1)(E)														0
1124(c)(4)(A)														0
1125(c)(1)														0
1125(c)(1)(C)														0
1125(d)(1)														0
1128(c)(1)														0
1128(c)(2)														0
1130														0
1130(c)(1)														0
1130(c)(4)														0
1131														0
1131(d)														0
1132(d)(2)														0
1132(d)(3)														0
1133(d)(8)														0
1133.2(d)(8)														0

Rules from which Variances and Order for Abatements were Requested in 2015														
	2015	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total Actions
1134(c)														0
1134(c)(1)														0
1134(d)														0
1134(d)(1)														0
1134(d)(2)(B)(ii)														0
1134(f)														0
1134(g)(2)														0
1135(c)(3)														0
1135(c)(3)(B)														0
1135(c)(3)(C)														0
1135(c)(4)														0
1135(c)(4)(D)														0
1136														0
1136(c)(1)(A)(i)														0
1137(d)(2)														0
1145														0
1145(c)(1)														0
1145(c)(2)														0
1145(g)(2)														0
1145(h)(1)(E)														0
1146						1								1
1146(c)(1)(A)				1										1
1146(c)(1)(G)			1				1							2
1146(c)(1)(I)				1										1
1146(c)(2)														0
1146(c)(2)(A)														0
1146(d)(8)														0
1146.1														0
1146.1(a)(2)														0
1146.1(a)(8)														0
1146.1(b)(3)														0
1146.1(c)(1)														0
1146.1(c)(2)														0
1146.1(d)(4)														0
1146.1(d)(6)														0
1146.1(e)(1)														0
1146.1(e)(1)(B)														0
1146.1(e)(2)														0
1146.2														0
1146.2(c)(1)		1												1
1146.2(c)(4)		1	1											2
1146.2(c)(5)		1												1
1146.2(e)														0
1147		1				1								2
1147(c)(1)								2						2
1147(c)(10)														0
1147(c)(14)(B)														0
1150.1(d)(1)(C)(i)		1												1



Rules from which Variances and Order for Abatements were Requested in 2015														
	2015	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total Actions
1150.1(d)(4)														0
1150.1(d)(5)														0
1150.1(d)(10)														0
1150.1(d)(11)														0
1150.1(d)(12)														0
1150.1(d)(13)														0
1150.1(d)(14)														0
1150.1(e)(1)														0
1150.1(e)(2)														0
1150.1(e)(3)														0
1150.1(e)(1)(B)(C)														0
1150.1(e)(1)(C)														0
1151.1(e)(2)(B)(C)														0
1150.1(e)(2)(C)														0
1150.1(e)(3)(B)														0
1150.1(e)(3)(B)(C)														0
1150.1(e)(3)(C)														0
1150.1(e)(4)														0
1150.1(e)(6)(A)(I)														0
1150.1(e)(6)(A)(ii)														0
1150.1(f)(1)(A)(iii)(I)														0
1150.1(f)(1)(H)(i)														0
1151														0
1151(c)(8)														0
1151(2)														0
1151(5)														0
1151(d)(1)														0
1151(e)(1)														0
1151(e)(2)														0
1151(f)(1)														0
1153(c)(1)														0
1153(c)(1)(B)														0
1156(d)(5)(C)(i)														0
1158														0
1158(d)(2)														0
1158(d)(5)														0
1158(d)(7)														0
1158(d)(7)(A)(ii)														0
1158(d)(10)														0
1164(c)(1)(B)														0
1164(c)(2)														0
1166(c)(2)														0
1166(c)(2)(F)														0
1166, Part 12				1										1
1168														0
1168(c)(1)														0
1169(c)(13)(ii)														0
1171														0

Rules from which Variances and Order for Abatements were Requested in 2015														
	2015	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total Actions
1171(c)														0
1171(c)(1)														0
1171(c)(1)(A)(i)														0
1171(c)(1)(b)(i)														0
1171(c)(4)														0
1171(c)(5)														0
1171(c)(5)(A)(i)														0
1171(c)(6)														0
1173														0
1173(c)														0
1173(d)														0
1173(e)(1)														0
1173(f)(1)(B)														0
1173(g)														0
1175														0
1175(c)(2)														0
1175(c)(4)(B)														0
1175(c)(4)(B)(i)														0
1175(c)(4)(B)(ii)														0
1175(c)(4)(B)(ii)(I)														0
1175(b)(1) (C)														0
1175(d)(4)(ii)(II)														0
1176														0
1176(e)														0
1176(e)(1)														0
1176(e)(2)														0
1176(e)(2)(A)														0
1176(e)(2)(A)(ii)														0
1176(e)(2)(B)(v)														0
1176(f)(3)														0
1177(d)(2)(D)														0
1178(d)(1)(A)(xiii)														0
1178(d)(1)(A)(xiv)														0
1178(d)(1)(B)														0
1178(d)(1)(C)														0
1178(d)(3)(C)														0
1178(d)(3)(D)														0
1178(d)(3)(E)														0
1178(d)(4)(A)(i)														0
1178(g)														0
1186.1														0
1186.1														0
1189(c)(3)														0
1195														0
1195(d)(1)(D)														0
1303(a)														0
1303(a)(1)														0
1303(b)(1)														0

Rules from which Variances and Order for Abatements were Requested in 2015														
	2015	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total Actions
1401														0
1401(d)														0
1401(d)(1)(A)														0
1401(d)(1)(B)														0
1405(d)(3)(C)														0
1407(d)														0
1407(d)(1)														0
1407(d)(2)														0
1407(d)(5)		1					1							2
1407(f)(1)														0
1415(d)(3)														0
1418(d)(2)(A)														0
1420(d)(1)		1												1
1420.1(f)(3)														0
1420.1(g)(4)														0
1420.1(k)(13)(B)														0
1421(d)														0
1421(d)(1)(C)														0
1421(d)(1)(G)														0
1421(d)(3)(A)														0
1421(e)(2)(c)														0
1421(e)(1)(A)(vii)														0
1421(e)(3)(B)														0
1421(h)(1)(A)														0
1421(h)(1)(B)														0
1421(h)(1)(C)														0
1421(h)(1)(E)														0
1421(h)(3)														0
1421(i)(1)(C)														0
1425(d)(1)(A)														0
1469														0
1469(c)														0
1469(c)(8)														0
1469(c)(11)(A)														0
1469(c)(13)(ii)														0
1469(d)(5)														0
1469(e)(1)														0
1469(e)(7)														0
1469(g)(2)														0
1469(h)														0
1469(l)														0
1469(j)(4)(A)														0
1469(j)(4)(D)														0
1469(k)(3)(A)														0
1470														0
1470(c)(2)(C)(i)(l)														0
1470(c)(2)(C)(iv)														0
1470(c)(3)(B)(ii)							1							1

Rules from which Variances and Order for Abatements were Requested in 2015														
	2015	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total Actions
1470(c)(3)(C)(iii)						4	1							5
1470(c)(4)														0
1470(c)(4)(B)			1											1
1470(c)(5)														0
1470(d)(2)(B)														0
1470(e)(2)(A)														0
2004(c)(1)		3						3						6
2004(c)(1)(C)														0
2004(f)(1)				4	2	1	2							9
2004(f)(2)														0
2004(k)														0
2005														0
2009(b)(2)														0
2009(c)														0
2009(f)(1)														0
2009(f)(2)														0
2009.1														0
2009.1(c)														0
2009.1(f)(1)														0
2009.1(f)(2)														0
2009.1(f)(3)														0
2011														0
2011 Attachment C														0
2011(c)(2)								1						1
2011(c)(2)(A)					1									1
2011(c)(2)(B)														0
2011(c)(3)(A)					1									1
2011(e)(1)														0
2011(f)(3)														0
2011(g)														0
2011(g)(1)														0
2011(k)								1						1
2011(k) Appen. A, Chap. 2, except E & Attach C														0
2011(k) Appen. A, Chap. 2, Section A.3 a-c, A.5 and B. 1-4 and Appen. A, Chap. 2, Section C.2.a, c & d														0
2011, Appen. A, Attach. C, Section B.2.a.								1						1
2012 Chapter 2														0
2012 Attach. C, B.2.a														0
2012 Appen. A, Attach. C, Section B.2.				1										1
2012 Appen. A, Attach. C, Section B.2.a. & b.														0
2012 Appen. A														0
2012 Appen. A, Chap. 2														0
2012 Appen A, Chap. 2, Sec. A														0
2012 Appen A, Chap. 2, Sec. A(1)						1								1
2012 Appen A, Chap. 2, Sec. B														0
2012, Appen. A, Protocol 2012, Chap. 2, B.5.														0
2012, Appen A, Chap. 2, B.5.a														0
2012, Appen A, Chap. 2, B.10														0

Rules from which Variances and Order for Abatements were Requested in 2015														
	2015	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total Actions
2012, Appen A, Chap. 2, B.11														0
2012, Appen A, Chap. 2, B.12														0
2012, Appen A, Chap. 2, B.17				1										1
2012, Appen A, Chap.2, B.18														0
2012, Appen A, Chap.2, B.20														0
2012, Chapter 2, E.2.b.i.														0
2012, Chapter 2, E.2.b.ii.														0
2012 Appen A, Chap. 4.A.4														0
2012(B)(5)(e)														0
2012(c)(2)(A)					1	1								2
2012(c)(2)								1						1
2012(c)(3)														0
2012(c)(3)(A)					1	1								2
2012(c)(3)(B)														0
2012(c)(10)														0
2012(d)(2)														0
2012(d)(2)(A)														0
2012(d)(2)(D)														0
2012(f)(2)(A)				1										1
2012(g)(1)				1		1								2
2012(g)(3)														0
2012(g)(7)														0
2012(h)(3)														0
2012(h)(4)														0
2012(h)(5)														0
2012(h)(6)														0
2012(i)														0
2012(j)(1)														0
2012(j)(2)														0
2012, Protocol (Appen. A) Chap. 2, Part A.1.a														0
2012, Protocol (Appen. A) Chap. 2, Part B.4														0
2012, Protocol, (Appen A) Chap. 2, Part B.5.e														0
2012 Chapter 2, B.5.f														0
2012(m)														0
2012(m) Table 2012-1, and Appen. A, Chp 2, & Attachment C														0
2012(m) Appen. A, Attach. C														0
2012(m) Appen. A, Chap. 2, Sections 2.A.1 a-c, e.g, and B. 1-4 and Appendix A, Chapter 3, Section C.2 a, c & d														0
2012(m) Appen. A, Chap 3, Section (A)(6)														0
2012(m) Appen. A, Chap 5, Para G, Table 5B and Att. D														0
2202				1										1
3002				1										1
3002(c)														0
3002(c)(1)		3	1	3		1	2	3						13
3002(c)(2)														0
Regulation II														0
Regulation IX														0
Regulation IX, 40 CFR Part 60, Subpart J														0

Rules from which Variances and Order for Abatements were Requested in 2015														
	2015	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total Actions
Regulation XI														0
Regulation XIII														0
H&S 39152(b)														0
H&S 41510														0
H&S 41700		1												1
H&S 41701														0
H&S 93115.6(c)(2)(C)(1)														0
H&S 42303														0
Title 13 Code of Regulations §2452														0

## Report of June 2015 Hearing Board Cases

Case Name and Case No.	Rules	Reason for Petition	District Position/ Hearing Board Action	Type and Length of Variance or Order	Excess Emissions
1. Becton, Dickinson, and Company Case No. 6026-1 (B. Gilchrist)	203(b)	Power outage required petitioner to operate emergency generator beyond 200 hour/year limit.	No Position/Denied	RV denied.	N/A
2. City of Los Angeles, LA Sanitation Case No. 1212-34 (M. Reichert)	203(b)	Petitioner unable to operate flare serving landfill gas collection system due to damage caused by vandals.	Not Opposed/Granted	Ex Parte EV granted commencing 6/13/15 and continuing until 7/6/15 or until the IV currently scheduled for 6/18/15, whichever occurs first.	VOC: TBD by 7/21/15
3. City of Riverside Regional Water Quality Control Plant Case No. 5674-8 (M. Reichert)	203(b)	Petitioner exceeding 0.5 ppm H2S limit.	Not Opposed/Granted	Ex Parte EV granted commencing 6/16/15 and continuing for 30 days or until the EV currently scheduled for 6/25/15, whichever comes first.	H2S: 2.48 lbs/day
4. Elsinore Valley Municipal Water District Case No. 5742-3 (S. Hanizavareh)	203(b)	Power outage required petitioner to operate emergency generator beyond 200 hour/year limit.	Opposed/Dismissed	IV dismissed for lack of good cause without prejudice.	N/A
5. SCAQMD vs. Exide Technologies, Inc. Case No. 3151-29 (N. Feldman & T. Barrera)	203(b) 1407(d)(5) 2004(f)(1) 3002(c)(1)	Respondent has not operated equipment since March 2014 and is in process of permanently closing facility.	Stipulated/Terminated	Terminated existing O/A.	N/A
6. SCAQMD vs. Sterling International Towers Case No. 6029-1 (M. Reichert)	1470(c)(3)(C)(iii)	Respondent operating diesel emergency generator exceeding PM limits within 100 meters of a school.	Stipulated/Issued	O/A issued commencing 6/18/15 and continuing through 6/1/16. The Hearing Board shall retain jurisdiction over this matter until 7/1/16.	N/A
7. SCAQMD vs. VA Long Beach Health Care System Case No. 4280-3 (K. Manwaring)	1146(c)(1)(G)	Respondent operating three boilers exceeding NOx limits of Rule 1146.	Stipulated/Issued	O/A issued commencing 6/4/15 and continuing through 8/7/15. The Hearing Board shall retain jurisdiction over this matter until 6/4/16.	N/A

Case Name and Case No.	Rules	Reason for Petition	District Position/ Hearing Board Action	Type and Length of Variance or Order	Excess Emissions
8. Ultramar Inc., dba Valero Wilmington Refinery Case No. 3845-92 (V. Tyagi)	202(a) 203(b) 2004(f)(1) 3002(c)(1)	Leak in heat exchanger caused petitioner to take Alky Unit and FCCU offline. CO, opacity and fuel gas sulfur limit will be exceeded on restart.	Not Opposed/Granted	Ex Parte EV granted commencing 6/3/15 and continuing for 30 days or until the EV hearing currently scheduled for 6/11/15, whichever comes first.	CO & Opacity: TBD by 7/14/15

## Acronyms

AOC: Alternative Operating Conditions  
 CARB: California Air Resources Board  
 CEMS: Continuous Emissions Monitoring System  
 CO: Carbon Monoxide  
 ESP: Electrostatic Precipitator  
 EV: Emergency Variance  
 FCD: Final Compliance Date  
 FCCU: Fluid Catalytic Cracking Unit  
 GDF: Gasoline Dispensing Facility  
 H&S: Health & Safety Code  
 H2S: Hydrogen Sulfide  
 ICE: Internal Combustion Engine  
 I/P: Increments of Progress  
 IV: Interim Variance  
 MFCD/EXT: Modification of a Final Compliance Date and Extension of a Variance  
 Mod. O/A: Modification of an Order for Abatement  
 NERC: North American Electric Reliability Corporation  
 NH3: Ammonia  
 NOx: Oxides of Nitrogen  
 O/A: Order for Abatement  
 OSHPD: Office of Statewide Health Planning and Development  
 PM: Particulate Matter  
 PPM: Parts Per Million  
 RATA: Relative Accuracy Test Audit  
 ROG: Reactive Organic Gas  
 RV: Regular Variance  
 SCR: Selective Catalytic Reduction  
 SO2: Sulfur Dioxide  
 SOx: Oxides of Sulfur  
 SV: Short Variance  
 TBD: To be determined  
 VOC: Volatile Organic Compounds  
 VRS: Vapor Recovery System



## Report of July 2015 Hearing Board Cases

Case Name and Case No.	Rules	Reason for Petition	District Position/ Hearing Board Action	Type and Length of Variance or Order	Excess Emissions
1. Burlington Engineering, Inc. Case No. 5998-1 (N. Feldman)	1147(c)(1)	Petitioner cannot meet I/P requiring source test by specified date.	Not Opposed/Granted	Interim Authorization granted for I/P No. 3.a, commencing 7/2/15 and extending through 8/2/15.	None
2. Burlington Engineering, Inc. Case No. 5998-1 (N. Feldman)	1147(c)(1)	Petitioner cannot conduct source test by specified date due to additional city requirements for footings to support control equipment.	No Position/Dismissed	Mod. I/P dismissed without prejudice.	N/A
3. Chevron Products Company Case No. 831-375 (M. Lorenz)	203(b) 2004(f)(1) 2011(c)(2) 2012(c)(2) 3002(c)(1)	BTU analyzer serving cogen unit and resid stripper furnace failed.	Not Opposed/Granted	Ex Parte EV granted commencing 7/7/15 and continuing for 30 days or until the EV hearing currently scheduled for 7/16/15, whichever comes first.	None
4. City of Burbank, Burbank Water and Power Case No. 1474-29 (Consent Calendar; No Appearance)	203(b) 2004(f)(1) 3002(c)(1)	Petitioner may exceed NOx and CO limits during equipment tuning for summer conditions.	Not Opposed/Granted	SV granted commencing 7/28/15 and continuing for 2 non-consecutive days of testing or until 9/30/15, whichever occurs sooner.	NOx: 37 lbs/total CO: 23.23 lbs/total NH <sub>3</sub> : 12.60 lbs/total
5. City of Los Angeles/LA Sanitation Case No. 1212-34 (M. Reichert)	203(b)	Petitioner may exceed its annual 200-hour limit of operation for emergency generator.	Not Opposed/Denied	RV denied.	N/A
6. Elsinore Valley Municipal Water District Case No. 5742-3 (S. Hanizavareh)	203(b)	Petitioner exceeding hours of operation limit for emergency generator.	Not Opposed/Granted	RV granted commencing 7/15/15 and continuing through 12/31/15.	ROG, NOx, CO & PM: TBD by 7/30/15
7. SCAQMD vs. Western Riverside County Regional Wastewater Authority Case No. 6033-1 (N. Sanchez)	402	Respondent causing odor nuisance.	Stipulated/Issued	O/A issued commencing 7/28/15; the Hearing Board shall retain jurisdiction over this matter until 10/31/16.	N/A

Case Name and Case No.	Rules	Reason for Petition	District Position/ Hearing Board Action	Type and Length of Variance or Order	Excess Emissions
8. Tesoro Refining & Marketing Co, LLC Case No. 4982-99 (S. Hanizavareh)	203(b) 2004(f)(1) 2011(k) 2011, Appendix A, Attachment C, Section B.2.a. 3002(c)(1)	Petitioner cannot complete RATA by 6/1/15, as required.	Not Opposed/Granted	Ex Parte EV granted commencing 7/2/15 and continuing for 30 days or until the SV hearing currently scheduled for 7/23/15, whichever comes first.	None

### Acronyms

AOC: Alternative Operating Conditions  
APC: Air Pollution Control  
BACT: Best Available Control Technology  
BTU: British Thermal Unit  
CEMS: Continuous Emissions Monitoring System  
CEQA: California Environmental Quality Act  
CO: Carbon Monoxide  
DPF: Diesel Particulate Filter  
EV: Emergency Variance  
FCCU: Fluid Catalytic Cracking Unit  
FCD: Final Compliance Date  
GDF: Gasoline Dispensing Facility  
H2S: Hydrogen Sulfide  
H&S: Health & Safety Code  
ICE: Internal Combustion Engine  
I/P: Increments of Progress  
IV: Interim Variance  
MFCD/EXT: Modification of a Final Compliance Date and Extension of a Variance  
Mod. I/P: Modification Increments of Progress

Mod. O/A: Modification Order for Abatement  
NH3: Ammonia  
NOV: Notice of Violation  
NOx: Oxides of Nitrogen  
N/A: Not Applicable  
O/A: Order for Abatement  
PM: Particulate Matter  
PPM: Parts Per Million  
RATA: Relative Accuracy Test Audit  
ROG: Reactive Organic Gases  
RTO: Regenerative Thermal Oxidizer  
RV: Regular Variance  
SCR: Selective Catalytic Reduction  
SOx: Oxides of Sulfur  
SV: Short Variance  
TBD: To be determined  
VOC: Volatile Organic Compound  
VRS: Vapor Recovery System

[↑ Back to Agenda](#)

BOARD MEETING DATE: September 4, 2015

AGENDA NO. 19

REPORT: Civil Filings and Civil Penalties Report

SYNOPSIS: This reports the monthly penalties from June 1 through June 30, 2015, and legal actions filed by the General Counsel's Office from June 1 through June 30, 2015. An Index of District Rules is attached with the penalty report.

COMMITTEE: Stationary Source, July 24, 2015, Reviewed

RECOMMENDED ACTION:  
Receive and file this report.

Kurt R. Wiese  
General Counsel

KRW:lc

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Violations

Civil Actions Filed

3	LOHARPUL, INC., dba McFADDEN GASOLINE Central Justice Center (Orange) Case No. 30-2015-00794133-SC-SC-CJC; Filed: 6.18.15 (PH) P62424, P59328, P60800 R. 203 – Permit to Operate R. 206 - Posting of Permit to Operate R. 461 - Gasoline Transfer and Dispensing
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3 Violations

1 Case

**Attachments**

June 2015 Penalty Report

Index of District Rules and Regulations

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
General Counsel's Office**

**June 2015 Settlement Penalty Report**

**Total Penalties**

Civil Settlements:	\$321,620.59
Miscellaneous Settlements:	\$2,400.00
MSPAP Settlements:	\$41,405.00
Hearing Board Settlements:	\$7,500.00
Total Cash Settlements:	\$372,925.59
Total SEP Value:	\$60,000.00
Fiscal Year through June 2015 Cash Total:	\$8,756,703.24
Fiscal Year through June 2015 SEP Value Only Total:	\$359,000.00

FAC ID	COMPANY NAME	RULE NUMBER	RECLAIM ID	SETTLED DATE	ATTY INT	NOTICE NO.	TOTAL SETTLEMENT
<b>CIVIL SETTLEMENTS:</b>							
130543	8750 WILSHIRE ASSOCIATES, LP	1470 1470		6/26/2015	NSF	P60963 P60957	\$5,000.00
160080	AERVOE INDUSTRIES INC	1113(C)(1)		6/19/2015	WBW	P60309	\$3,670.59
177424	BROTHERS HAULING	1403		6/23/2015	KCM	P60158	\$3,500.00
16389	CEDARSSINAI MEDICAL CTR	3002(C)(1) 3002		6/25/2015	AJO	P57999 P60131	\$25,000.00
178449	EL TORO PLAZA L.P.	1403		6/17/2015	WBW	P53086	\$6,000.00
105334	HOLLYWOOD ROOSEVELT HOTEL	1470		6/9/2015	RRF	P59369	\$10,000.00
126219	HYEFLO	461		6/11/2015	NSF	P61472	\$2,500.00
134018	INDUSTRIAL CONTAINER SERVICESCA LLC	3002(C)(1)	Y	6/2/2015	SH	P60504	\$1,000.00
800170	LA CITY, DWP HARBOR GENERATING STATION	2004, 2012 2004, 2012 3002	Y	6/9/2015	NAS	P55537 P55548 P55537	\$19,000.00
172505	LOHARPUL, INC. DBA MCFADDEN GASOLINE	203(A), 203(B), 461(C)(2)(B) 461 (E) (1) 203, 203(A), 206, 461(C)(2)(B)		6/26/2015	PH	P59328 P60800 P62424	\$1,900.00
5887	NEXGEN PHARMA INC	3002		6/11/2015	SH	P58898	\$1,000.00

FAC ID	COMPANY NAME	RULE NUMBER	RECLAIM ID	SETTLED DATE	ATTY INT	NOTICE NO.	TOTAL SETTLEMENT
141473	NONG SHIM AMERICA, INC	203, 203 (A), 1146 203 (A), 203(B)		6/5/2015	KCM	P56717 P56721	\$112,500.00
138034	RAINBOW SANDALS CORP	109, 203 (A), 203(B), 442 203(A), 203 (B)		6/3/2015	TRB	P59661 P59663	\$12,900.00
800182	RIVERSIDE CEMENT COMPANY		3002	6/23/2015	TRB	P54975	\$1,000.00
140316	SUNRISE OF SAN GABRIEL		1470 1470	6/10/2015	WBW	P58595 P58599	\$6,000.00
154445	WILMINGTON PARK INC Small Claims		461	6/11/2015	PH	P61489	\$650.00

**TOTAL CIVIL SETTLEMENTS: \$211,620.59**

**SUPPLEMENTAL ENVIRONMENTAL PROJECTS:**

150216	BREITBURN OPERATING LP Cash: \$110,000; SEP: \$60,000 By July 2, 2015; Breituren shall enter into a contract with ARCA to fund ARCA to recycle and replace old, inefficient residential household refrigerators for dismantling and processing at its Compton facility for a minimum of two years.	203(B), 462(D)(1)(A)		6/23/2015	NAS	P56984	\$170,000.00
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**TOTAL SEP SETTLEMENT: \$170,000.00**

FAC ID	COMPANY NAME	RULE NUMBER	RECLAIM ID	SETTLED DATE	ATTY INT	NOTICE NO.	TOTAL SETTLEMENT
<b>MSPAP SETTLEMENTS:</b>							
149102	2000 AVE OF THE STARS/TRAMMELL CROW C	203 (B), 1415		6/3/2015		P60660	\$4,000.00
178889	AFCO DEVELOPMENT INC.	403(D)(1), 403(D)(2)		6/23/2015		P61711	\$3,850.00
165878	AVALON ARCO & SN MART	461(C)(2)(B)		6/11/2015		P59348	\$1,200.00
169632	BELL GAS	461(C)(2)(B), 41960.2		6/23/2015		P61954	\$825.00
173861	BLUE DEVILS LESSEE, LLC	203		6/2/2015		P60967	\$1,000.00
76120	CAL ST, WATER RESOURCES DEPT	203 (B)		6/17/2015		P61551	\$550.00
102137	CIRCLE K STORES INC., #5221	461, 41954, 41960.2		6/24/2015		P61663	\$900.00
122876	COMMERCE CITY	403(D)(1), 403(D)(2) 403(D)(1)		6/18/2015		P60508 P60513	\$6,000.00
172250	CORONA FUELING & ELECTRIC, INC	461, 41954		6/4/2015		P60912	\$690.00
29853	ELECTRO CONSTRUCTION CORPORATION	PERP 2460		6/2/2015		P62484	\$500.00
145620	ENTERTAINMENT CENTER LLC	203 (A)		6/3/2015		P60659	\$200.00
141471	FERNANDO NUNEZ	PERP 2460		6/11/2015		P60511	\$350.00
131380	FOOD 4 LESS #354	203 (B)		6/11/2015		P60067	\$600.00
175966	GARDENA CAPITAL LLC GARDENA MOBIL MAR	461		6/11/2015		P59322	\$130.00

FAC ID	COMPANY NAME	RULE NUMBER	RECLAIM ID	SETTLED DATE	ATTY INT	NOTICE NO.	TOTAL SETTLEMENT
148907	GILL AND SUMRA, INC./H&K GAS & GROCER		461	6/11/2015		P60071	\$150.00
115355	HAT PETROLEUM	461 (E) (1), 41960.2		6/24/2015		P61658	\$450.00
115355	HAT PETROLEUM	461 (E) (1)		6/24/2015		P62429	\$450.00
161383	HIGHLAND PARK OIL INC	203 (A), 461		6/11/2015		P60061	\$150.00
177285	JULIO ORTIZ AGUIRE	203 (A)		6/12/2015		P55648	\$300.00
2338	LOS ANGELES NATIONAL CEMETARY	203 (A)		6/5/2015		P60132	\$1,350.00
148835	M & J UNION 76, RAFAAT R LUGA	461, 41960.2		6/10/2015		P59777	\$520.00
141324	RODRIGUEZ SANDBLASTING, C. RODRIGUEZ	203 (A)		6/16/2015		P59674	\$375.00
10267	SAINT MARY'S MEDICAL CENTER	204, 221, 1146		6/25/2015		P59714	\$7,900.00
175641	SARO GHAZERI	461		6/11/2015		P61956	\$400.00
56747	SUPERFINE	461		6/10/2015		P60072	\$800.00
147549	VALERO, THREE FOUR INC.	203		6/17/2015		P60823	\$1,000.00
116953	VALLEY BLVD PRP INC, UNION 76 MINI MK	203(B), 461(C)(2)(B)		6/2/2015		P60921	\$1,440.00
146496	VULCAN MATERIALS COMPANY	403 403		6/16/2015		P57699 P57698	\$1,925.00
40674	WEBB'S AUTO & TRUCK SERVICE, R. WEBB	461(C)(2)(B)		6/16/2015		P61953	\$1,000.00



FAC ID	COMPANY NAME	RULE NUMBER	RECLAIM ID	SETTLED DATE	ATTY INT	NOTICE NO.	TOTAL SETTLEMENT
125302	WESTERN STATES ENGINEERING & CONSTRUCTION		461	6/23/2015		P62348	\$1,600.00
28653	WINALL OIL CO #11		461	6/12/2015		P62346	\$800.00

**MSPAP SETTLEMENTS: \$41,405.00**

**MISCELLANEOUS SETTLEMENTS:**

175512	B/E AEROSPACE DBA TEKLAM CORP. This matter was brought to Prosecutor's Office by Area Sources. The facility was in violation of District Rules pertaining to the operation of two heaters through and including June 12, 2015.	203, 222, 1146.2		6/5/2015	KCM	MIS157	\$2,400.00
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**TOTAL MISCELLANEOUS SETTLEMENT: \$2,400.00**

**HEARING BOARD SETTLEMENTS:**

35188	3M COMPANY Hearing Board Case No. 5970-2 Penalty for ongoing operation of the facility's equipment in noncompliance until 9.15.15.	203, 1147, 1303		6/12/2015	KCM	HRB2279	\$4,000.00
44873	A. C. D. INC Hearing Board Case No. 5970-2 Penalty for ongoing operation of the facility's equipment in noncompliance until 9.15.15.	203, 1147, 1303		6/2/2015	KCM	HRB2278	\$2,500.00

FAC ID	COMPANY NAME	RULE NUMBER	RECLAIM ID	SETTLED DATE	ATTY INT	NOTICE NO.	TOTAL SETTLEMENT
118984	NORTHRIDGE HOSPITAL MEDICAL CENTER Hearing Board Case No. 6004-2 Penalty relates to the settlement of NOV P62151. Northridge agreed to pay \$1000/month for continuous use of two broilers out of compliance with District rule.		1146	6/2/2015	NAS	HRB2277	\$1,000.00

**TOTAL HEARING BOARD SETTLEMENTS: \$7,500.00**

## DISTRICT RULES AND REGULATIONS INDEX FOR JUNE 2015 PENALTY REPORTS

### REGULATION I - GENERAL PROVISIONS

Rule 109      Recordkeeping for Volatile Organic Compound Emissions (*Amended 8/18/00*)

### REGULATION II – PERMITS

List and Criteria Identifying Information Required of Applicants Seeking A Permit to Construct from the South Coast Air Quality Management - District (*Amended 4/10/98*)

Rule 203      Permit to Operate (*Amended 1/5/90*)

Rule 204      Permit Conditions (*Amended 10/8/93*)

Rule 206      Posting of Permit to Operate (*Amended 10/8/93*) *Explains how and where permits are to be displayed.*

Rule 221      Plans (*Adopted 1/4/85*)

Rule 222      Filing Requirements for Specific Emission Sources Not Requiring a Written permit Pursuant to Regulation II. (*Amended 5/19/00*)

### REGULATION IV - PROHIBITIONS

Rule 403      Fugitive Dust (*Amended 12/11/98*) *Pertains to solid particulate matter emitted from man-made activities.*

Rule 442      Usage of Solvents (*Amended 12/15/00*)

Rule 461      Gasoline Transfer and Dispensing (*Amended 6/15/01*)

### REGULATION XI - SOURCE SPECIFIC STANDARDS

Rule 1113      Architectural Coatings (*Amended 6/20/01*)

Rule 1146      Emissions of Oxides of Nitrogen from Industrial, Institutional and Commercial Boilers, Steam Generators, and Process Heaters (*Amended 11/17/00*)

Rule 1146.2      Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers (*Adopted 1/9/98*)

Rule 1147      NO<sub>x</sub> REDUCTIONS FROM MISCELLANEOUS SOURCES (9/08)

### **REGULATION XIII - NEW SOURCE REVIEW**

Rule 1303 Requirements (*Amended 4/20/01*)

### **REGULATION XIV - TOXICS**

Rule 1403 Asbestos Emissions from Demolition/Renovation Activities (*Amended 4/8/94*)

Rule 1415 Reduction of Refrigerant Emissions from Stationary Refrigeration and Air Conditioning Systems (*Amended 10/14/94*)

Rule 1470 Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines

### **REGULATION XX REGIONAL CLEAN AIR INCENTIVES MARKET (RECLAIM)**

Rule 2004 Requirements (*Amended 5/11/01*)

Rule 2012 Requirements for Monitoring, Reporting, and Recordkeeping for Oxides of Nitrogen (NO<sub>x</sub>) Emissions (*Amended 5/11/01*)

### **REGULATION XXX - TITLE V PERMITS**

Rule 3002 Requirements (*Amended 11/14/97*)

### **CALIFORNIA HEALTH AND SAFETY CODE § 41700**

41954 Compliance for Control of Gasoline Vapor Emissions

41960.2 Gasoline Vapor Recovery

### **CALIFORNIA CODE OF REGULATIONS**

PERP 2460 Portable Equipment Testing Requirements

 Back to Agenda

BOARD MEETING DATE: September 4, 2015

AGENDA NO. 20

PROPOSAL: Report of RFPs Scheduled for Release in September

SYNOPSIS: This report summarizes the RFPs for budgeted services over \$75,000 scheduled to be released for advertisement for the month of September.

COMMITTEE: Administrative, July 17, 2015; Less than a quorum was present; the Committee Members concurred that this item be approved by the Board.

**RECOMMENDED ACTION:**

Approve the release of RFPs for the month of September.

Barry R. Wallerstein, D.Env.  
Executive Officer

MBO:lg

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**Background**

At its January 8, 2010 meeting, the Board approved a revised Procurement Policy and Procedure. Under the revised policy, RFPs for budgeted items over \$75,000, which follow the Procurement Policy and Procedure, no longer require individual Board approval. However, a monthly report of all RFPs over \$75,000 is included as part of the Board agenda package and the Board may, if desired, take individual action on any item. The report provides the title and synopsis of the RFP, the budgeted funds available, and the name of the Deputy Executive Officer/Asst. Deputy Executive Officer responsible for that item. Further detail including closing dates, contact information, and detailed proposal criteria will be available online at <http://www.aqmd.gov/grants-bids> following Board approval on September 4, 2015.

**Outreach**

In accordance with SCAQMD's Procurement Policy and Procedure, a public notice advertising the RFPs and inviting bids will be published in the Los Angeles Times, the Orange County Register, the San Bernardino Sun, and Riverside County's Press

Enterprise newspapers to leverage the most cost-effective method of outreach to the South Coast Basin.

Additionally, potential bidders may be notified utilizing SCAQMD's own electronic listing of certified minority vendors. Notice of the RFPs will be emailed to the Black and Latino Legislative Caucuses and various minority chambers of commerce and business associations, and placed on the Internet at SCAQMD's website (<http://www.aqmd.gov>) where it can be viewed by making the selection "Grants & Bids."

### **Proposal Evaluation**

Proposals received will be evaluated by applicable diverse panels of technically-qualified individuals familiar with the subject matter of the project or equipment and may include outside public sector or academic community expertise.

### **Attachment**

Report of RFPs Scheduled for Release on September 4, 2015

**September 4, 2015 Board Meeting  
Report on RFPs Scheduled for Release on September 4, 2015**

(For detailed information visit SCAQMD's website at  
<http://www.aqmd.gov/rfp/index.html> following Board approval on September 4, 2015)

**STANDARDIZED SERVICES**

RFP #P2016-02 Issue Request for Proposal for Janitorial Services at Diamond Bar Headquarters JOHNSON/3018

The current janitorial services contract expires February 28, 2016. This action is to issue an RFP to solicit bids from interested parties in order to secure a new three-year contract for this service. Funds for this service are included in the FY 2015-16 Budget and will be included in budgets for each of the remaining fiscal years of the contract.

**RESEARCH AND DEVELOPMENT OR SPECIAL TECHNICAL EXPERTISE**

RFP #P2016-07 Issue Request for Proposal for Telecommunication Services MARLIA/3148

On November 2, 2012, the Board approved contracts with various vendors to provide telecommunication services to the SCAQMD. These telecommunication services include local, long distance, and toll-free; private IP (PIP)/frame relay network; dedicated T1 lines, internet access; phone switch maintenance; and wireless voice and data. The contracts will expire on December 30, 2015. This action is to issue an RFP to select vendors capable of providing these services for a three-year period. Funds for this expense are included in the FY 2015-16 Budget, and will be included in each of the two remaining fiscal years of the contract.

BOARD MEETING DATE: September 4, 2015

AGENDA NO. 21

REPORT: FY 2014-15 Contract Activity

SYNOPSIS: This report lists the number of contracts let during FY 2014-15, the respective dollar amounts, award type, and the authorized contract signatory for the SCAQMD. This report includes the data provided in the March 2015 report covering contract activity for the first six months of FY 2014-15.

COMMITTEE: No Committee Review

RECOMMENDED ACTION:  
Receive and file.

Barry R. Wallerstein, D.Env.  
Executive Officer

MBO:DH:EA:lg

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### **Background**

Since FY 1995-96, staff has provided semi-annual reports to the Board on contract activity. This report identifies five categories of contract awards: 1) New Awards – new contracts for professional services and research projects; 2) Other – air monitoring station leases, Board Assistant agreements, or miscellaneous lease agreements that generate revenue, e.g., lease of SCAQMD space; 3) Sponsorships – contracts funding public events and technical conferences which provide air quality related benefits; 4) Amendments – modifications to existing contracts usually reflecting changes in the project scope and/or schedule; 5) Terminated Contracts – Partial Work Performed – modifications to contracts to reflect termination of a portion or all of the work which result in de-obligation of contract funding. The report further specifies under New Awards, which contracts were awarded competitively and which were awarded on a sole-source basis. Within the first four categories, the level of approval (Board or Executive Officer) is indicated.



**Summary**

Of the 1,273, contracts and modifications (including terminations) issued during this period New Awards accounted for 852, Other accounted for 26, Sponsorships accounted for 23, and Modifications accounted for 281. The total value for New Awards was \$144,625,498.00. Of that amount, \$140,037,423.00 or 97% was awarded through the competitive process. The total value of all contracts and amendments for this period was \$153,336,489.03 with 886 contracts and amendments totaling \$150,601,059.17 approved by the Board and 296 contracts and amendments totaling \$2,735,429.86 approved by the Executive Officer. This does not include modifications for termination with partial work or no work completed which is addressed below. Of this latter amount, \$678,722.40 representing 20 contracts and modifications was for Board Member Assistant contracts as approved by the Board's Administrative Committee; \$1,204,317.00 representing 37 contracts was sole sourced in the areas of technical consulting (\$779,262.00), litigation/legal services (\$326,600.00), and miscellaneous (\$98,455.00); \$170,300.00 representing 23 contracts was for sponsorships in advanced technologies and community and business outreach; and \$456,218.86 representing 204 contracts was for contract modifications for extensions of time or additional budgeted services from previously approved vendors. Contract terminations with partial or no work completed numbered 91 during this period and de-obligated a total of \$19,854,470.56.

<b>CONTRACT CATEGORY</b>	<b>NUMBER</b>	<b>AMOUNT</b>
NEW AWARDS	852	\$144,625,498.00
OTHER	26	\$ 739,922.00
SPONSORSHIPS	23	\$ 170,300.00
MODIFICATIONS	281	\$ 7,800,769.03
TERMINATIONS	91	-\$ 19,854,470.56

**Attachment**

Contract Activity Report for the period July 1, 2014 through June 30, 2015

**South Coast Air Quality Management District**  
**Contract Activity Report**  
**July 1, 2014 - June 30, 2015**

DEPT ID	DEPT NAME	CONTRACT NUMBER	FUND CODE	DESCRIPTION	VENDOR NAME	CONTRACT AMOUNT	FOOT NOTE
<b>I. NEW AWARDS</b>							
<b>Competitive - Board Approved</b>							
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12376	31	TECHNICAL ASSISTANCE FOR AIR POLLUTION FORMATION AND CONTROL, ADVANCED TRANSPORTATION TECHNOLOGIES AND SYSTEMS, EMISSIONS MEASUREMENTS AND ANALYSIS, ALTERNATIVE FUEL TECHNOLOGIES, SUSTAINABLE ENERGY SYSTEMS, AND OFF-ROAD VEHICLES AND EQUIPMENT	UNIVERSITY OF CALIFORNIA, RIVERSIDE	\$75,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14062	61	CONSTRUCT A ONE MILE CATENARY SYSTEM & DEVELOP AND DEMONSTRATE A DIESEL CATENARY HYBRID ELECTRIC TRUCK	SIEMENS INDUSTRY, INC.	\$13,500,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14077	32	REPOWER 2 MAIN ENGINES ON 1 MARINE VESSEL	ANTHONY G. COMBS	\$157,250.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14101	32	REPOWER 1 MAIN ENGINE ON 1 MARINE VESSEL	PHILIP MINUTO	\$63,908.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14125	32	REPOWER 1 MAIN ENGINE ON 1 MARINE VESSEL	TERRY BOYD	\$62,972.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14167	17	OUTREACH WORKSHOPS & ASSISTANCE TO WORKPLACES & FLEETS	SOUTHERN CALIFORNIA ASSOCIATION OF GOVT	\$105,000.00	
26	PLANNING RULE DEV & AREA SOURCES	C14171	31	AIR POLLUTION HEALTH EFFECTS - IN-UTERO EXPOSURES TO TRAFFIC RELATED POLLUTANTS	SOUTHERN CALIFORNIA RESEARCH	\$99,670.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14177	81	PROP 1B LEASE TO OWN PROGRAM	VENTURA TRANSFER COMPANY	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14178	32	REPOWER 4 OFF-ROAD VEHICLES	DAN COPP CRUSHING CORPORATION	\$708,770.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14258	81	PROP 1B TRUCK REPLACEMENT PROGRAM	A-G SOD FARMS, INC.	\$550,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14318	32	REPOWER OF 3 OFF-ROAD VEHICLES	RENTRAC INC	\$347,428.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14326	32	REPOWER 3 OFF-ROAD VEHICLES	PEED EQUIPMENT COMPANY	\$475,326.00	

**South Coast Air Quality Management District**  
**Contract Activity Report**  
**July 1, 2014 - June 30, 2015**

<b>DEPT ID</b>	<b>DEPT NAME</b>	<b>CONTRACT NUMBER</b>	<b>FUND CODE</b>	<b>DESCRIPTION</b>	<b>VENDOR NAME</b>	<b>CONTRACT AMOUNT</b>	<b>FOOT NOTE</b>
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14327	32	REPLACEMENT OF 6 DIESEL SCRAPERS	RENTRAC INC	\$2,236,265.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14328	81	PROP 1B TRUCK REPLACEMENT PROGRAM	BIAGI BROS. INC	\$900,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14329	81	PROP 1B TRUCK REPLACEMENT PROGRAM	M & V EQUIPMENT, LLC	\$300,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14331	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PARKHOUSE TIRE INC.	\$325,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14333	81	PROP 1B TRUCK REPLACEMENT PROGRAM	WESTSIDE BUILDING MATERIAL CORP	\$410,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14338	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DENNIE MANNING CONCRETE INC	\$150,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14339	81	PROP 1B TRUCK REPLACEMENT PROGRAM	NP TRUCKING MANAGEMENT, INC	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14340	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ADAMS & SONS TRANSPORATION, INC.	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14341	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CERENZIA FOODS INC.	\$140,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14342	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CPC TRANSPORTATION CO, LLC	\$535,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14343	81	PROP 1B TRUCK REPLACEMENT PROGRAM	NUCKLES OIL CO., INC. DBA MERIT OIL CO.	\$200,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14344	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RRM PROPERTIES, LTD	\$16,200,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14345	81	PROP 1B TRUCK REPLACEMENT PROGRAM	VAN DYK TANK LINES, INC.	\$650,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14346	81	PROP 1B TRUCK REPLACEMENT PROGRAM	AJR TRUCKING, INC.	\$845,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14349	81	PROP 1B TRUCK REPLACEMENT PROGRAM	HASCO OIL CO., INC	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14350	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LINCOLN TRANSPORATION SERVICES INC.	\$275,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14351	81	PROP 1B TRUCK REPLACEMENT PROGRAM	TOWERS ENVIRONMENTAL, INC	\$100,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14352	81	PROP 1B TRUCK REPLACEMENT PROGRAM	W C LOGISTICS INC.	\$1,450,000.00	

**South Coast Air Quality Management District**  
**Contract Activity Report**  
**July 1, 2014 - June 30, 2015**

<b>DEPT ID</b>	<b>DEPT NAME</b>	<b>CONTRACT NUMBER</b>	<b>FUND CODE</b>	<b>DESCRIPTION</b>	<b>VENDOR NAME</b>	<b>CONTRACT AMOUNT</b>	<b>FOOT NOTE</b>
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14353	81	PROP 1B TRUCK REPLACEMENT PROGRAM - THREE WAY TRANSACTION PROJECT	HASCO OIL CO., INC	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14354	81	PROP 1B TRUCK REPLACEMENT PROGRAM	TELLURIC PETROLEUM TRANSPORT, INC.	\$100,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14356	32	REPLACEMENT OF 2 OFF-ROAD VEHICLES WITH 1 OFF-ROAD VEHICLE	SUKUT CONSTRUCTION, INC.	\$312,631.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14361	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CALPORTLAND CONSTRUCTION	\$105,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14362	81	PROP 1B TRUCK REPLACEMENT PROGRAM	GARDNER TRUCKING, INC.	\$4,750,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14363	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JORLEASE, INC	\$455,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14364	31	DEVELOPMENT, INTEGRATION, AND DEMONSTRATION OF ULTRA-LOW EMISSION NATURAL GAS ENGINES FOR ON-ROAD HEAVY DUTY VEHICLES	CUMMINS POWER GENERATION INC	\$2,061,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14367	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ALICIA VELAZQUEZ	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14368	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ANTONIO MARTINEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14369	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CRUZ AGUILAR	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14370	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ELENA AVITIA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14371	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JUAN FRANCISCO CORONADO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14372	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LUIS LOPEZ	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14373	81	PROP 1B TRUCK REPLACEMENT PROGRAM	NORBERTO LOPEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14374	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SERGIO ENRIQUE CARO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14378	63	UPGRADE CITY OF BURBANK HYDROGEN FUELING STATION	H2 FRONITER, INC.	\$930,800.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14379	81	PROP 1B TRUCK REPLACEMENT PROGRAM	VANESSA DELGADO	\$40,000.00	

**South Coast Air Quality Management District**  
**Contract Activity Report**  
**July 1, 2014 - June 30, 2015**

<b>DEPT ID</b>	<b>DEPT NAME</b>	<b>CONTRACT NUMBER</b>	<b>FUND CODE</b>	<b>DESCRIPTION</b>	<b>VENDOR NAME</b>	<b>CONTRACT AMOUNT</b>	<b>FOOT NOTE</b>
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14380	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ADVANCED RIGGERS & MILLWRIGHTS LLC	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14381	81	PROP 1B TRUCK REPLACEMENT PROGRAM	VICTOR MIRAMONTES	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14382	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RALPH V. ADAMS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14384	81	PROP 1B TRUCK REPLACEMENT PROGRAM	VINUEZA TRUCKING	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14386	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DEMECIO AVILA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14387	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DEMMING VALIENTE	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14388	81	PROP 1B TRUCK REPLACEMENT PROGRAM	AC TRANSPORT SERVICES INC.	\$75,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14389	81	PROP 1B TRUCK REPLACEMENT PROGRAM	AGL TRANSPORT INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14390	81	PROP 1B TRUCK REPLACEMENT PROGRAM	WAYNES 1 WAY TRUCKING, INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14391	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CORDOVA SOLUTIONS, INC.	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14392	81	PROP 1B TRUCK REPLACEMENT PROGRAM	P.A. PARKER, INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14393	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RUDY GAITAN TRUCKING INC.	\$120,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14394	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ABELARDO NAVAR	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14395	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ALFREDO AGUIRRE	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14396	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ALVARO SANCHEZ LOPEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14398	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RICARDO JIMENEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14399	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ARMANDO REYES	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14400	81	PROP 1B TRUCK REPLACEMENT PROGRAM	BALBIR SINGH HANSPAL	\$40,000.00	

**South Coast Air Quality Management District**  
**Contract Activity Report**  
**July 1, 2014 - June 30, 2015**

<b>DEPT ID</b>	<b>DEPT NAME</b>	<b>CONTRACT NUMBER</b>	<b>FUND CODE</b>	<b>DESCRIPTION</b>	<b>VENDOR NAME</b>	<b>CONTRACT AMOUNT</b>	<b>FOOT NOTE</b>
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14401	81	PROP 1B TRUCK REPLACEMENT PROGRAM	EDUARDO P MELENDEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14402	81	PROP 1B TRUCK REPLACEMENT PROGRAM	HECTOR GUTIERREZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14403	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JORGE LUIS RODRIGUEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14406	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SHINGARA SINGH	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14407	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JUAN VILLASENOR	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14408	81	PROP 1B TRUCK REPLACEMENT PROGRAM	NELSON PORTILLO	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14409	32	OPERATE 2 REPOWERED SCRAPERS	JCE EQUIPMENT, INC.	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14410	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ANDRES BECERRA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14411	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FIDEL BADILLA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14412	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DIRECT TRANSPORTATION INC.	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14413	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ESL TRANSPORT INC.	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14414	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DAGOBERTO C. CALZADO	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14415	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MARIO SOLIS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14416	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RAFAEL ZERMENO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14417	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RAUL RAYA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14418	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE LUIS TOMATANI	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14419	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JAIME VILLATORO	\$40,000.00	
27	INFORMATION MANAGEMENT	C14420	2	PHONE SYSTEM REPLACEMENT	EPOCH UNIVERSAL, INC	\$1,555,847.00	

**South Coast Air Quality Management District**  
**Contract Activity Report**  
**July 1, 2014 - June 30, 2015**

<b>DEPT ID</b>	<b>DEPT NAME</b>	<b>CONTRACT NUMBER</b>	<b>FUND CODE</b>	<b>DESCRIPTION</b>	<b>VENDOR NAME</b>	<b>CONTRACT AMOUNT</b>	<b>FOOT NOTE</b>
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14422	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ROCIO ELIZABETH FIALLO	\$105,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14423	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ALBERTO CABALLERO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14424	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JAVIER GALINDO	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14425	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SALVADOR GOMEZ MARQUEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14426	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE JIMENEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14427	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MARGARITO MORALES	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14428	81	PROP 1B TRUCK REPLACEMENT PROGRAM	HIRAM GOMEZ	\$75,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14429	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RALPH OMAR GONZALES	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14430	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RANJIT SINGH	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14431	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FRANCISCO RAYA	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14432	81	PROP 1B TRUCK REPLACEMENT PROGRAM	BLUE ICE LOGISTICS, INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14433	81	PROP 1B TRUCK REPLACEMENT PROGRAM	BULLY EXPRESS LLC	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14434	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ET TRANSPORTATION INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14435	81	PROP 1B TRUCK REPLACEMENT PROGRAM	F&A EXPRESS, INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14436	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JESSE GONZALEZ TRUCKING, INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14437	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JSA TRANSPORTATION LLC	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14439	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MUSE EXPRESS INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14440	81	PROP 1B TRUCK REPLACEMENT PROGRAM	AGUSTIN ALAMILLA	\$40,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14441	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SALMEX FREIGHT, INC.	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14442	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ALFREDO V CARLOS	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14443	81	PROP 1B TRUCK REPLACEMENT PROGRAM	OBEL ANTONIO ARACADIA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14445	81	PROP 1B TRUCK REPLACEMENT PROGRAM	BIG G'S TRANSPORT	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14446	81	PROP 1B TRUCK REPLACEMENT PROGRAM	E ROBLES TRUCKING	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14447	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MIGUEL LUNA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14448	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MARGARITO A. DURAN	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14449	81	PROP 1B TRUCK REPLACEMENT PROGRAM	IRINEO RAMIREZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14450	81	PROP 1B TRUCK REPLACEMENT PROGRAM	BENITO MIKE RAMOS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14451	81	PROP 1B TRUCK REPLACEMENT PROGRAM	VICENTE PINZON	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14452	81	PROP 1B TRUCK REPLACEMENT PROGRAM	APPLEBEE LEASING, INC	\$1,825,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14453	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RAMON A. BLANCO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14454	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DOUGLAS FERNANDO RODRIGUEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14455	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ENRIQUE OROZCO	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14457	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE VICENTE RIVERA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14458	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DAVID MAURICIO CHAIREZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14460	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PEDRO E. PEREZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14461	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MARIO CHAVEZ SALAZAR	\$40,000.00	



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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14462	81	PROP 1B TRUCK REPLACEMENT PROGRAM	GABRIEL SOLANO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14465	81	PROP 1B TRUCK REPLACEMENT PROGRAM	NICOLAS ACERO	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14467	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DRHV TRUCKING INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14469	81	PROP 1B TRUCK REPLACEMENT PROGRAM	HOLLYWOOD BED & SPRING MFG. CO, INC.	\$105,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14470	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE AGUIRRE ORNELAS	\$45,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14471	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MARTIN SERRANO MARTINEZ DBA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14473	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSEFINA CAMAYO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14478	81	PROP 1B TRUCK REPLACEMENT PROGRAM	I AND M LOGISTIC TRANSPORT INC.	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14480	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CASE TRANSPORTATION INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14481	81	PROP 1B TRUCK REPLACEMENT PROGRAM	D.OWEN INC.	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14483	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LAS MARIAS PALLETS	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14484	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE JUAN MARQUEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14485	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CARLOS MONTOYA	\$150,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14486	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RAMIRO MELGOZA MEZA	\$49,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14487	81	PROP 1B TRUCK REPLACEMENT PROGRAM	IGNACO MARTIN DEL CAMPO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14489	63	UPGRADE LAX HYDROGEN FUELING STATION	AIR LIQUIDE INDUSTRIAL U.S. LP	\$2,200,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14490	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MURAD MIKE MINASYAN	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14491	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DARIN BRASSARD	\$50,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14492	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOHN E. HERNANDEZ	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14493	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ARTURO LIRA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14494	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CUPERTINO BRAVO	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14495	81	PROP 1B TRUCK REPLACEMENT PROGRAM	GURSHARAN S SANDHU	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14496	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PAVEL ORLIK	\$45,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14497	81	PROP 1B TRUCK REPLACEMENT PROGRAM	WALTER LOPEZ	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14498	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DARRICK MURPHY STONE	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14499	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ANTONIO VELASCOS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14500	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ALFREDO MAGANA ALCALA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14501	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CARLOS RAMIREZ DBA CM RAMIREZ TRANSPORT	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14502	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DAN CAVALLO, INC.	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14503	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DENNIS D. MEJIA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14504	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DONALDO'S TRANSPORT	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14505	81	PROP 1B TRUCK REPLACEMENT PROGRAM	EL MAGUEY EXPRESS TRANSPORT	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14507	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LUIS E ESCOBAR	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14508	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FELIPE DE JESUS RIVAS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14509	81	PROP 1B TRUCK REPLACEMENT PROGRAM	VICENTE MARTINEZ HERNANDEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14514	81	PROP 1B TRUCK REPLACEMENT PROGRAM	A-G SOD FARMS, INC.	\$200,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14515	81	PROP 1B TRUCK REPLACEMENT PROGRAM	REGINA TAYLOR	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14516	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JUAN CARLOS GASTELUM	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14517	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ISRAEL SIFONTES	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14518	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DANNY ARREDONDO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14519	81	PROP 1B TRUCK REPLACEMENT PROGRAM	HINOJOSA TRUCKING INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14520	81	PROP 1B TRUCK REPLACEMENT PROGRAM	HECTOR M LLAMAS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14521	81	PROP 1B TRUCK REPLACEMENT PROGRAM	GUILLERMO VILLALPANDO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14522	81	PROP 1B TRUCK REPLACEMENT PROGRAM	GUADALUPE SANCHEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14523	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOAQUIN FUENTES	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14524	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FRANCISCO RIVAS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14525	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ALEJANDRO GODFREY	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14526	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ALONSO AMADOR	\$75,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14527	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CESAR SERRANO CRUZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14528	81	PROP 1B TRUCK REPLACEMENT PROGRAM	COINCRE TRUCKING, INC.	\$85,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14529	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DMJ TRUCKING INC.	\$105,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14530	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ESQ DELIVERY SERVICES	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14531	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FEDERICO GAYTAN	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14532	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FOSTER AND SONS RECYLING INC.	\$50,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14533	81	PROP 1B TRUCK REPLACEMENT PROGRAM	GILBERT CANTELLANO	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14534	81	PROP 1B TRUCK REPLACEMENT PROGRAM	GIOVANNI B. CARBALLO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14537	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ARTURO DOMINGUEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14538	81	PROP 1B TRUCK REPLACEMENT PROGRAM	GREGORIO AYALA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14539	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ANGEL ALBERTO ARROYO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14540	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ARMANDO ABEDOY	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14541	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ARTURO CARRERA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14542	81	PROP 1B TRUCK REPLACEMENT PROGRAM	AUDAZ TRANSPORT, INC.	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14544	81	PROP 1B TRUCK REPLACEMENT PROGRAM	C & C AMERICA INC.	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14546	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JACQUELYN R. LIMON	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14547	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE E. FLORES	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14548	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE JAIME MARTINEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14549	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE JESUS GALVEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14550	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE M. SOTELO	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14551	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LILLYAM IVETTE CENTENO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14552	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LUIS JESUS MEDINA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14553	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JAMES DEITEMEYER	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14554	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOVIC TRANSPORT INC.	\$40,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14555	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JULIO CESAR VASQUEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14556	81	PROP 1B TRUCK REPLACEMENT PROGRAM	KB MIRAMONTES, INC.	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14557	81	PROP 1B TRUCK REPLACEMENT PROGRAM	HENRY CASTORENA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14558	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LEONARDO DIAZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14559	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CATARINO LEON	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14560	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PABLO A SANDOVAL	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14561	81	PROP 1B TRUCK REPLACEMENT PROGRAM	M & J TRANSPORTATION SERVICES, INC.	\$49,500.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14562	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MANUEL ANTONIO MURCIA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14563	81	PROP 1B TRUCK REPLACEMENT PROGRAM	HECTOR MANUEL RAMIREZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14564	81	PROP 1B TRUCK REPLACEMENT PROGRAM	GEVORG KHUDYAN	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14565	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE JESUS FRANCO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14566	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SLEEPING BEAR, INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14568	81	TECHNICAL ASSISTANCE, IMPLEMENTATION & OUTREACH SUPPORT FOR PROP 1B GOODS MOVEMENT PROGRAM	TETRA TECH INC	\$250,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14569	81	PROP 1B TRUCK REPLACEMENT PROGRAM	TRANSPORTATION COMMODITIES INC.	\$900,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14570	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ALVARO A. LOPEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14571	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JAIME HINOSTROZA	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14572	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JAIME JUAREZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14573	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JONATHAN HEGVOLD	\$50,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14574	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ANTONIO JAIME	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14576	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SOMOHANO EXPRESS GROUP INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14577	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DANIEL S. RODRIGUEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14578	81	PROP 1B TRUCK REPLACEMENT PROGRAM	TED SOLOMON TRUCKING, INC.	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14579	81	PROP 1B TRUCK REPLACEMENT PROGRAM	HECTOR ESCOBEDO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14580	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ALFREDO NAVARRO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14581	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RODRIGO AGUILAR	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14582	81	PROP 1B TRUCK REPLACEMENT PROGRAM	VICTOR AGUILAR	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14583	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CARLOS BAUTISTA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14584	81	PROP 1B TRUCK REPLACEMENT PROGRAM	BEN'S ASPHALT INC.	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14585	81	PROP 1B TRUCK REPLACEMENT PROGRAM	GABRIEL M FLORES	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14586	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE H. TALAMANTES	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14587	81	PROP 1B TRUCK REPLACEMENT PROGRAM	GERARDO MEZA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14588	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MANUEL ARTURO VIDEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14590	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PONCIANO ARZATE	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14591	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RAFAEL CHAVEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14592	81	PROP 1B TRUCK REPLACEMENT PROGRAM	WILLIAM RAMOS	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14594	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RONY ENRIQUE RICHARD	\$40,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14595	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RUBEN GONZALEZ ALVARADO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14596	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PEDRO RUIZ GARCIA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14597	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE SANCHEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14598	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ANDRES SANDOVAL	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14599	81	PROP 1B TRUCK REPLACEMENT PROGRAM	HOWARD JAFFA	\$49,850.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14600	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MIGUEL A. MORENO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14601	81	PROP 1B TRUCK REPLACEMENT PROGRAM	TRI MINH BUI	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14602	81	PROP 1B TRUCK REPLACEMENT PROGRAM	TRANSPORT SPECIALTIES, INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14603	81	PROP 1B TRUCK REPLACEMENT PROGRAM	TRANSPORTES DEL PACIFICO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14604	81	PROP 1B TRUCK REPLACEMENT PROGRAM	TRUDELL TRUCKING INC.	\$85,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14605	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE PABLO ULLOA	\$70,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14606	81	PROP 1B TRUCK REPLACEMENT PROGRAM	VICTOR MANUEL HERNANDEZ	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14607	81	PROP 1B TRUCK REPLACEMENT PROGRAM	W & N TRANSPORT INC.	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14608	81	PROP 1B TRUCK REPLACEMENT PROGRAM	WALTER W. RODRIGUEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14609	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JORGE GONZALEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14610	81	PROP 1B TRUCK REPLACEMENT PROGRAM	NANETTE PARTEN	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14611	81	PROP 1B TRUCK REPLACEMENT PROGRAM	NICOLAS TRINIDAD	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14612	81	PROP 1B TRUCK REPLACEMENT PROGRAM	HUMBERTO E NORENA	\$40,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14613	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE JESUS SANCHEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14614	81	PROP 1B TRUCK REPLACEMENT PROGRAM	NOTW TRUCKING INC.	\$49,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14617	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PABLO A BENITEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14618	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PABLO CESAR PRIMUCCI	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14619	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CARLOS PANTOJA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14624	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ROCKVIEW DAIRIES, INC.	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14625	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CATERER'S LEASING INC	\$85,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14626	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PAN PACIFIC PETROLEUM	\$200,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14628	81	PROP 1B TRUCK REPLACEMENT PROGRAM	VILLA PARK TRUCKING, INC.	\$310,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14630	81	PROP 1B TRUCK REPLACEMENT PROGRAM	AURELIO GARCIA HARRIZON	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14631	81	PROP 1B TRUCK REPLACEMENT PROGRAM	BDC ENTERPRISES INC.	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14632	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CARLOS VARGAS PASILLAS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14633	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CHARLIE LIKINS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14635	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PAUL COOK'S TRANSPORT LLC	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14636	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SEVEN TRANSPORTATION, INC.	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14637	81	PROP 1B TRUCK REPLACEMENT PROGRAM	T & R LUMBER CO., INC.	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14639	81	PROP 1B TRUCK REPLACEMENT PROGRAM	AZTECA MAGIC TRANSPORT INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14640	81	PROP 1B TRUCK REPLACEMENT PROGRAM	BRIAN J LANGFORD	\$40,000.00	



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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14641	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CHAVEZ BROS. ENTERPRISES, INC.	\$78,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14642	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CONSTRUCTION SERVICES & RECYLING, INC.	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14643	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOHN YAMAHIRO	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14644	81	PROP 1B TRUCK REPLACEMENT PROGRAM	G AND A EXPRESS LLC	\$39,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14645	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LIMON TRUCKING INC.	\$120,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14646	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LOERA TRUCKING	\$49,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14647	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LUCKY TRANSPORT ENTERPRISES, INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14648	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FELIPE HUERTA RAYGOZA	\$75,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14649	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SOUTHLAND XPRESS INC.	\$120,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14650	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SEAN M. BRODIE	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14651	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE AGUILAR	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14652	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JUAN CAUDILLO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14653	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LUIS F. BONILLA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14654	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RAFAEL TELLES	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14655	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RAMON SOLIS	\$40,000.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C14657	01	WORKER'S COMPENSATION CLAIMS THIRD PART ADMINISTRATOR	ADMINSURE, INC	\$55,087.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C14658	01	CONFERENCE SEATING REPLACEMENT	AMERICAN SEATING CO	\$139,167.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14659	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ALL AROUND SEPTIC	\$40,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14660	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DAN BALOUCHI	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14661	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ENRIQUE C TERAN	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14662	81	PROP 1B TRUCK REPLACEMENT PROGRAM	GONZALEZ BRAMS TRUCKING	\$36,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14663	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FRANCISCO JIMENEZ	\$49,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14664	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LEDESMA & SONS TRUCKING INC.	\$100,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14665	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MIGUEL SANCHEZ	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14666	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ARNULFO NUNCIO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14667	81	PROP 1B TRUCK REPLACEMENT PROGRAM	EVERARDO ROCHA	\$39,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14668	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SANTIAGO SANCHEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14671	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FRESH IS BEST	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14672	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RAFAEL HEREDIA	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14673	81	PROP 1B TRUCK REPLACEMENT PROGRAM	HOVANNES GRIGORIAN	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14674	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MARTIN GARCIA	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14675	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RUBEN COVARRUBIAS	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14676	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ANTHONY JOE RINCON	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14677	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SV TRANSPORT, INC.	\$120,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14678	81	PROP 1B TRUCK REPLACEMENT PROGRAM	AJEET SINGH	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14679	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DOLLAR TRUCKING	\$50,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14686	32	REPLACEMENT OF 2 OFF-ROAD DIESEL VEHICLES	LOS ANGELES COUNTY SANITATION DISTRICT	\$312,046.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15029	62	RETROFIT OF DPF TECHNOLOGY ON STANDBY BACKUP GENERATOR AT WATSON ROAD BOOSTER	EASTERN MUNICIPAL WATER DISTRICT	\$33,415.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15030	62	RETROFIT OF DPF TECHNOLOGY ON STAND-BY BACK-UP GENERATOR AT LETTERMAN BOOSTER	EASTERN MUNICIPAL WATER DISTRICT	\$43,454.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15031	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ALAN C. OCHOA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15032	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ANGEL RODRIGUEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15033	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ARMANDO GUEVARA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15034	81	PROP 1B TRUCK REPLACEMENT PROGRAM	B.A.VARELA	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15035	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CLAUDIA HORTA	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15036	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ISRAEL TORRES VILLEGAS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15037	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOEL MUNGUIA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15038	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JORGE SANCHEZ ROJAS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15039	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE E. MARTINEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15042	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JUAN MACIAS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15043	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MARCO MARTINEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15044	81	PROP 1B TRUCK REPLACEMENT PROGRAM	NELTON WILFREDO LINARES BENITEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15045	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PAUL F. BOURELLE	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15046	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SALVADOR DIAZ	\$40,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15047	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SANDRA L. ALZATE	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15048	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SERGIO ANTONIO SOTO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15050	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CARLOS GONZALEZ	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15051	81	PROP 1B TRUCK REPLACEMENT PROGRAM	W & J LAZARO, INC.	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15052	81	PROP 1B TRUCK REPLACEMENT PROGRAM	AMERICAN TRANSLINE	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15053	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ARMANDO R. CASTRO	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15054	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ANTHONY D GHENO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15056	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JORGE ANAYA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15057	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JAVIER HERNANDEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15058	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JROD BROTHERS INC.	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15059	81	PROP 1B TRUCK REPLACEMENT PROGRAM	KEYSTONE AUTO TRANSPORT. INC.	\$39,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15060	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SARKIS MKRTCHYAN	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15061	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SOUTHWEST TRUCKING GROUP, LLC	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15062	81	PROP 1B TRUCK REPLACEMENT PROGRAM	STRAIGHT AT IT INC.	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15063	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JUAN P LOPEZ	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15064	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JUAN R. MEJIA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15065	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JESUS MANUEL MATA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15066	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE ELOY ACOSTA	\$40,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15068	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JORGE JACOBO GONZALEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15069	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SOTERO HERRERA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15070	81	PROP 1B TRUCK REPLACEMENT PROGRAM	BILLY PANAMENO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15071	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CARLOS DIAZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15072	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CONSTANTINO LOPEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15075	81	PROP 1B TRUCK REPLACEMENT PROGRAM	GENARO CERVANTES	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15076	81	PROP 1B TRUCK REPLACEMENT PROGRAM	GEORGE CASTELLO	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15077	81	PROP 1B TRUCK REPLACEMENT PROGRAM	HECTOR BERNAL	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15078	81	PROP 1B TRUCK REPLACEMENT PROGRAM	HUGO SALDANA MORENO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15079	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOEL MANZO GODINEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15080	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE ENRIQUE VELASCO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15081	81	PROP 1B TRUCK REPLACEMENT PROGRAM	AA LABORATORY EGGS INC.	\$25,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15084	81	PROP 1B TRUCK REPLACEMENT PROGRAM	J. L. KROPP TRUCKING, INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15085	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PEDRO JIMENEZ	\$25,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15086	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SOUTHERN CALIFORNIA O.T.R. RECYCLING INC	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15088	81	PROP 1B TRUCK REPLACEMENT PROGRAM	TIMES PRODUCE INC.	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15089	81	PROP 1B TRUCK REPLACEMENT PROGRAM	VICTOR VASQUEZ SR.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15090	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JESUS RUIZ	\$50,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15091	81	PROP 1B TRUCK REPLACEMENT PROGRAM	EUGENIO GARCIA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15092	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SARA J. GOMEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15093	81	PROP 1B TRUCK REPLACEMENT PROGRAM	HAROLDO A. MORALES	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15094	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JUAN D. PENA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15095	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JUAN TELLEZ DBA J.T. Trucking	\$39,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15096	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JUNIOR STEEL CO.	\$25,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15097	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RAMIRO DE LA CUEVA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15098	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MONTANI TRUCKING INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15099	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PRUITT TRUCKING SERVICES, INC.	\$100,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15100	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SIGNATURE TRANSPORT	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15101	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JUVENTINO MIRANDA	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15102	81	PROP 1B TRUCK REPLACEMENT PROGRAM	AVENUE 8 GROUP INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15104	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RODOLFO R. ORDUNA	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15105	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RAED ALKILANI	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15106	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RESTAD GENERAL ENGINEERING	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15107	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RGE TRUCK LINES, INC.	\$120,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15108	81	PROP 1B TRUCK REPLACEMENT PROGRAM	UNITED CARGO LOGISTICS	\$150,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15110	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SYSTEM TRANSPORT A CORP.	\$50,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15111	81	PROP 1B TRUCK REPLACEMENT PROGRAM	TRIUMPH SALES, INC.	\$665,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15112	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ERNESTO PEREZ	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15114	81	PROP 1B TRUCK REPLACEMENT PROGRAM	GLORIA ISABEL PEREZ ORANTES	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15115	81	PROP 1B TRUCK REPLACEMENT PROGRAM	WILLIE JAY BRYANT	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15116	81	PROP 1B TRUCK REPLACEMENT PROGRAM	HECTOR C. PEREZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15117	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MOLINA & SONS TRUCKING	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15118	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SILVER GALAXY CORPORATION	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15119	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CESAR POLANCO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15120	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JAVIER CATALAN	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15122	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LEODEGARIO SALCIDO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15123	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RUDY ABEDOY	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15124	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ALEJANDRO RODRIGUEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15125	81	PROP 1B TRUCK REPLACEMENT PROGRAM	HERMAN A FLAMENCO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15126	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JBS AUTO TRANSPORT LLC	\$100,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15127	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MARK STEVEN GARCIA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15129	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JORGE A BERNAL	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15130	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JUAN ALBERTO SOLARES	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15131	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ROBERT WEST CONSTANTINO	\$40,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15132	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CPS EXPRESS	\$160,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15133	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SOUTH COAST TRANSPORTATION & DIST. INC.	\$400,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15135	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CAMERON E. ATKIN	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15136	81	PROP 1B TRUCK REPLACEMENT PROGRAM	BANDERAS TRUCKING	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15139	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PACO MORALES PEREZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15141	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FERDINAND DAVIS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15142	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DAYTON TRUCKING	\$49,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15143	81	PROP 1B TRUCK REPLACEMENT PROGRAM	QUALITY LOAD TRANSPORT CORP.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15144	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SALVADOR DAVALOS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15150	31	INSTALL/UPGRADE EIGHT HYDROGEN FUELING STATIONS THROUGHOUT SCAB	AIR PRODUCTS & CHEMICALS INC	\$1,000,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15151	81	PROP 1B TRUCK REPLACEMENT PROGRAM	C. TRUCKING, INC.	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15152	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CARLOS PINEDO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15153	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE CASTRO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15154	81	PROP 1B TRUCK REPLACEMENT PROGRAM	D DEL CID TRUCKING INC.	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15157	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PROSPERO FELIX CISNEROS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15158	81	PROP 1B TRUCK REPLACEMENT PROGRAM	NOEL REAL	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15159	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PEDRO SARINANA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15160	81	PROP 1B TRUCK REPLACEMENT PROGRAM	M LEDEZMA INC.	\$40,000.00	



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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15161	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MIRAMONTES TRANSPORTATION INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15162	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ANGEL ALDUENDA BARRAZA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15163	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE ARMANDO AYALA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15164	81	PROP 1B TRUCK REPLACEMENT PROGRAM	BENITO MARTINEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15166	81	PROP 1B TRUCK REPLACEMENT PROGRAM	NGUYEN GIA ON LY	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15167	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PHILLIP BUTLER	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15168	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CAT 9 EXPRESS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15169	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ISIDRO CORREA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15170	81	PROP 1B TRUCK REPLACEMENT PROGRAM	BOWERS TRANSPORT COMPANY	\$76,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15171	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FRANCO'S EXPRESS TRUCKING, INC.	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15172	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FREDY RODRIGUEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15173	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FREDY URIAS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15174	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JORGE GONZALEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15175	81	PROP 1B TRUCK REPLACEMENT PROGRAM	GUILLERMO RUIZ	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15176	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ARNULFO LEMUS CEBALLOS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15177	81	PROP 1B TRUCK REPLACEMENT PROGRAM	GABLE A. BOLAGH	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15178	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ARTHUR GONZALES	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15179	81	PROP 1B TRUCK REPLACEMENT PROGRAM	WILBER M GONZALEZ	\$40,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15180	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ARTURO PEREZ	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15181	81	PROP 1B TRUCK REPLACEMENT PROGRAM	GEMS SEAFOODS, INC.	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15182	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ANGEL G. GALVAN	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15183	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE LUIS HERNANDEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15184	81	PROP 1B TRUCK REPLACEMENT PROGRAM	HECTOR QUINTERO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15185	81	PROP 1B TRUCK REPLACEMENT PROGRAM	EDUARDO RUBEN HOYOS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15186	81	PROP 1B TRUCK REPLACEMENT PROGRAM	IGNACIO CONTRERAS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15187	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PABLO R. MONTOYA DERAS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15188	81	PROP 1B TRUCK REPLACEMENT PROGRAM	J TORRES TRANSPORTATION INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15189	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JUST CARGO XPRESS, INC.	\$120,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15192	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ARAIK OVSEPYAN	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15193	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JULIO H DE LEON	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15194	81	PROP 1B TRUCK REPLACEMENT PROGRAM	EFRAIN GOMEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15195	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FELIX OSORIO DBA FELIX TRUCKING	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15197	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FJG TRANSPORT INC	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15198	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE AVILA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15199	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JUAN CARCAMO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15201	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FRANK E. BLISSENBACH	\$40,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15203	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MOISES CABRERA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15204	81	PROP 1B TRUCK REPLACEMENT PROGRAM	OSVALDO BARCENAS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15205	81	PROP 1B TRUCK REPLACEMENT PROGRAM	REGO'S LOWBED EQUIPMENT TRANSPORTATION	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15207	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE ANGEL RODRIGUEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15208	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JONATHAN MEDINA	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15209	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE L RODRIGUEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15210	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE ANGEL MALDONADO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15211	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSEPH SHERMAN S MARTINEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15212	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JORGE B. QUIROA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15213	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JULIO GUTIERREZ	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15214	81	PROP 1B TRUCK REPLACEMENT PROGRAM	K-TRANS INC	\$120,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15215	81	PROP 1B TRUCK REPLACEMENT PROGRAM	KGS TRUCKING, INC.	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15216	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FIDEL ANGEL CRUZ MENDOZA	\$39,900.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15218	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FRANCISCO JAVIER C NAVA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15219	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MANUEL CRUZ ANGELES	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15220	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MARCO ANTONIO PENALOZA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15221	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MARIO ERNESTO CRUZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15222	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ROBERTO SOUZA	\$40,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15223	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ROGER JOSE MORALES PINEDA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15224	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SALVADOR GALVEZ BRAVO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15226	81	PROP 1B TRUCK REPLACEMENT PROGRAM	TRANSCORDOVA, INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15227	81	PROP 1B TRUCK REPLACEMENT PROGRAM	WILFREDO EDUARDO RODAS	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15229	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FRANK JACKSON	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15230	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FELIPE CANO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15231	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LUIS SALCEDA	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15232	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FENCE SPECIALTIES, INC.	\$25,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15233	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FIRST LANE LOGISTICS TRANSPORTATION	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15235	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FOREST WOOD FIBER PRODUCTS INC	\$150,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15236	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LUIS SANTACRUZ	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15237	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LUIS A. NEGRETE	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15238	81	PROP 1B TRUCK REPLACEMENT PROGRAM	KENNTH CELLUZZI	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15239	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MELVIN O. LOPEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15240	81	PROP 1B TRUCK REPLACEMENT PROGRAM	KUMAR AMANDEEP	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15241	81	PROP 1B TRUCK REPLACEMENT PROGRAM	L BROTHERS AND SONS INC	\$49,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15242	81	PROP 1B TRUCK REPLACEMENT PROGRAM	EDWARD R. LATOURETTE	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15243	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CARLOS M. LANDAVERDE	\$40,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15244	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MARNITIA MARTIN	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15245	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LL TRUCKING CO. LLC	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15246	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RUBEN LOPEZ DBA LOPEZ TRUCKING	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15247	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LUIS FERNANDO ARCHILA SAZO	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15248	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LASER STAR ENTERPRISES INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15249	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LEONARDO G LOPEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15253	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MANUEL CAMACHO DBA MANNY C TRUCKING	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15254	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MARTIAN TRUCKING, INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15255	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ISMAEL PEREZ IRIBE	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15256	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MICHAEL THOMPSON	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15258	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ARMANDO AMADOR	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15260	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MARCO ANTONIO SOTO	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15261	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MARIO A. PORTILLO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15262	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MASC TRUCKING INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15263	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MELLENDEZ FAMILY LIMITED PARTNERSHIP	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15264	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MELGOZA TRUCKING INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15265	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MG INDEPENDENT DISTRIBUTOR INC.	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15266	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SERAFIN MIRANDA DBA MIRANDA TRUCKING	\$50,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15267	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JORGE H REYNAGA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15269	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MANUEL MENA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15272	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PEDRO MIRANDA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15273	81	PROP 1B TRUCK REPLACEMENT PROGRAM	NABIH J. ESMEIRAT	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15274	81	PROP 1B TRUCK REPLACEMENT PROGRAM	NATIONAL PAVING COMPANY, INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15275	81	PROP 1B TRUCK REPLACEMENT PROGRAM	NERY OSMAN ORELLANA	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15277	81	PROP 1B TRUCK REPLACEMENT PROGRAM	OTY INC.	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15278	81	PROP 1B TRUCK REPLACEMENT PROGRAM	OSWALDO A FLORES	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15280	81	PROP 1B TRUCK REPLACEMENT PROGRAM	OSCAR BLANCO ORTIZ	\$60,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15281	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DANIEL ORELLANA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15284	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PADWORKS INC.	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15285	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PALM SPRINGS RECYLING CENTER, INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15286	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PASCUAL CHAVEZ RAMIREZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15287	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PEGASSO TRUCKING INC	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15288	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PEDRO MAURICIO GONZALEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15289	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DOUG OWENS	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15291	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PINE TREE LUMBER CO., LP	\$85,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15292	81	PROP 1B TRUCK REPLACEMENT PROGRAM	EFRAIN ESQUER	\$40,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15295	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RAYNARD FOSTER	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15296	81	PROP 1B TRUCK REPLACEMENT PROGRAM	REYNALDO CARRION	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15298	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RJB TRANSPORT, INC.	\$47,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15299	81	PROP 1B TRUCK REPLACEMENT PROGRAM	R L TRANSPORTATION SERVICES, INC.	\$38,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15300	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FRESH LINK LOGISTICS LLC	\$175,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15301	81	PROP 1B TRUCK REPLACEMENT PROGRAM	TED'S MEATS INC.OR TED'S FOODSERVICE	\$25,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15302	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RODOLFO AGUILERA	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15303	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RUBEN RANGEL	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15305	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RRM PROPERTIES, LTD	\$550,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15306	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ISMAEL SALDIVAR DBA SALDIVAR TRUCKING	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15308	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SEGILFREDO PAEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15309	81	PROP 1B TRUCK REPLACEMENT PROGRAM	OSCAR SILVA DBA SILVA EXPRESS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15310	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SOCAL BIOFUEL INC.	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15315	81	PROP 1B TRUCK REPLACEMENT PROGRAM	TRUSPRO STRUCTURAL COMPONENTS, INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15316	81	PROP 1B TRUCK REPLACEMENT PROGRAM	WCL TRUCKING CORP.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15318	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JESUS RAMON AMAYA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15319	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JERAMY T. PEREZ	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15320	81	PROP 1B TRUCK REPLACEMENT PROGRAM	NARINDER SINGH DBA SAHI TRUCKING	\$40,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15321	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JAGPAL S. JHATTU	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15322	81	PROP 1B TRUCK REPLACEMENT PROGRAM	T.F. TRUCKING, INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15323	81	PROP 1B TRUCK REPLACEMENT PROGRAM	TED LEVINE DRUM CO.	\$145,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15324	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DANIEL TREVINO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15325	81	PROP 1B TRUCK REPLACEMENT PROGRAM	TRIMMING LAND CO. INC.	\$170,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15326	81	PROP 1B TRUCK REPLACEMENT PROGRAM	UNITED PARCEL SERVICE, INC	\$2,575,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15327	81	PROP 1B TRUCK REPLACEMENT PROGRAM	T.A.H. TRUCKING INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15328	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DOMICIANO VALDEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15329	81	PROP 1B TRUCK REPLACEMENT PROGRAM	OMAR VILLASENOR	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15330	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MARCOS VELASCO	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15331	81	PROP 1B TRUCK REPLACEMENT PROGRAM	VICENTE ARROYO	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15332	81	PROP 1B TRUCK REPLACEMENT PROGRAM	VICENTE GONZALEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15333	81	PROP 1B TRUCK REPLACEMENT PROGRAM	VICENTE J. JIMENEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15334	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RENE C. VILLA DBA VILLA TRUCKING	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15335	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE ALFREDO VILLALOBOS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15336	81	PROP 1B TRUCK REPLACEMENT PROGRAM	VARUSH MELIKIAN	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15338	81	PROP 1B TRUCK REPLACEMENT PROGRAM	WALTER J. PEREZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15339	81	PROP 1B TRUCK REPLACEMENT PROGRAM	IVAN YURTAEV	\$60,000.00	



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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15340	81	PROP 1B TRUCK REPLACEMENT PROGRAM	WINEGARDNER MASONRY, INC.	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15344	31	TECHNICAL ASSISTANCE WITH ALTERNATIVE FUELS, ELECTRIC VEHICLES, CHARGING AND FUEL INFRASTRUCTURE	CLEAN FUEL CONNECTION INC	\$60,000.00	
20	MEDIA OFFICE	C15345	36	MEDIA, ADVERTISING AND OUTREACH CAMPAIGN FOR "CHECK BEFORE YOU BURN" PROGRAM	QUIJOTE CORP DBA SENSIS	\$493,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15348	81	PROP 1B TRUCK REPLACEMENT PROGRAM	VICENTE VILLEGAS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15349	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE ROSALES	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15350	81	PROP 1B TRUCK REPLACEMENT PROGRAM	HARRY BELLINGER	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15351	81	PROP 1B TRUCK REPLACEMENT PROGRAM	KG TRUCKING INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15352	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FAUSTINO ANDRADE	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15354	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DIAMOND MATTRESS COMPANY INC.	\$100,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15355	81	PROP 1B TRUCK REPLACEMENT PROGRAM	COMMERCIAL ROCK	\$140,000.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C15356	01	INSURANCE BROKERAGE SERVICES	ALLIANT INSURANCE SERVICES INC	\$147,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15359	81	PROP 1B TRUCK REPLACEMENT PROGRAM	THINH NGUYEN	\$11,870.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15364	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ARMANDO AMADOR	\$20,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15365	81	PROP 1B TRUCK REPOWER PROGRAM	JORGE DORADO ESTELLES	\$20,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15369	31	TECHNICAL ASSISTANCE WITH LOW- AND ZERO EMISSION VEHICLES, FUEL CELLS, STATIONARY APPLICATIONS AND EMISSIONS ANALYSES	BREAKTHROUGH TECHNOLOGIES INSTITUTE INC	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15370	81	PROP 1B TRUCK REPLACEMENT PROGRAM	EFRAIN HERNANDEZ	\$40,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15371	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LBJ & ASSOCIATES, INC.	\$85,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15372	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MERCADO LATINO, INC.	\$525,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15373	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MR. G TRUCKING INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15374	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SPATES FABRICATORS INC.	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15375	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FENCECORP, INC.	\$225,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15376	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FENCE WORKS INC.	\$200,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15377	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LADISLAO CIBRIAN	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15378	81	PROP 1B TRUCK REPLACEMENT PROGRAM	G.O. RODRIGUEZ TRUCKING, INC.	\$200,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15379	81	PROP 1B TRUCK REPLACEMENT PROGRAM	AIM TRANSPORTATION, INC.	\$365,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15380	31	TECHNICAL ASSISTANCE WITH GOODS MOVEMENT, ALTERNATIVE FUELS, AND ZERO-EMISSION TRANSPORTATION TECHNOLOGIES	ICF RESOURCES, LLC	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15383	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CR&R INCORPORATED	\$1,200,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15384	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MATERIALS TRANSPORT SERVICES	\$85,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15385	32	REPLACEMENT OF 9 OFF-ROAD VEHICLES	A-G SOD FARMS, INC.	\$339,335.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15386	32	REPLACE 2 OFF-ROAD DIESEL VEHICLES	WHITTIER FERTILIZER CO.	\$392,593.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15387	32	REPOWER OF 1 OFF-ROAD VEHICLE	BAUMANN HEAVY EQUIPMENT	\$34,560.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15392	81	PROP 1B TRUCK REPLACEMENT PROGRAM	L.A. TRUCKING, INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15393	81	PROP 1B TRUCK REPLACEMENT PROGRAM	NIGHT TRAIN TRANSPORT INC.	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15394	81	PROP 1B TRUCK REPLACEMENT PROGRAM	GREGORIO ROMERO	\$40,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15395	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LUIS RIGOBERTO PECH DBA JULIAS TRUCKING	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15396	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MARIBEL ALEJANDRA LEDESMA DBA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15397	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ABUNDIO FUENTES HERRERA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15398	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MARCO VILLASENOR	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15399	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE CASTRO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15400	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE ELISEO SORIANO	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15401	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MIGUEL A. GONZALES	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15402	81	PROP 1B TRUCK REPLACEMENT PROGRAM	R.W. ZANT CO.	\$285,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15403	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SHAMROCK GROUP INC	\$135,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15404	81	PROP 1B TRUCK REPLACEMENT PROGRAM	VICTOR M MOLINA PEREZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15405	81	PROP 1B TRUCK REPLACEMENT PROGRAM	NORBERT OTZOY	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15407	81	PROP 1B TRUCK REPLACEMENT PROGRAM	TWO STAR TRUCKING	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15408	81	PROP 1B TRUCK REPLACEMENT PROGRAM	WILLIAM O. BAIRES	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15409	81	PROP 1B TRUCK REPLACEMENT PROGRAM	BENJAMIN GARCIA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15410	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ESTEBAN GOMEZ	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15411	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ERIK REYES GIRON	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15412	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MICHAEL ANDREW LOPEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15413	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RUBEN PEREZ	\$40,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15414	81	PROP 1B TRUCK REPLACEMENT PROGRAM	NERY N SALGUERO	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15415	31	TECHNICAL ASSISTANCE WITH ALTERNATIVE FUELS AND FUELING INFRASTRUCTURE, EMISSIONS ANALYSIS AND ON-ROAD SOURCES	GLADSTEIN, NEANDROSS & ASSOCIATES	\$60,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15416	81	PROP 1B TRUCK REPLACEMENT PROGRAM	G.O.L. TRUCKING	\$49,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15417	81	PROP 1B TRUCK REPLACEMENT PROGRAM	J&J TRANSPORTATION VINSON, INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15421	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SEBASTIAN WATERWORKS, INC.	\$25,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15422	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOEL GONZALEZ AND YVONNE GONZALEZ	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15423	81	PROP 1B TRUCK REPLACEMENT PROGRAM	OMEGA PAVING, INC.	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15424	81	PROP 1B TRUCK REPLACEMENT PROGRAM	GABRIEL PINTOR	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15426	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JUANA GONZALEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15427	81	PROP 1B TRUCK REPLACEMENT PROGRAM	AISHU INC.	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15428	81	PROP 1B TRUCK REPLACEMENT PROGRAM	C & K TRUCKING LLC	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15429	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CECILA ISABEL FLORES	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15430	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MANUEL DE JESUS MARTINEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15431	81	PROP 1B TRUCK REPLACEMENT PROGRAM	VICENTE MORAN	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15432	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MIGUEL A. GRANADOS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15433	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LUIS BENITEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15434	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RICK AND DORTHEA TAYLOR	\$40,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15435	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MICHAEL SCOVELL	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15436	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ROMAN COVARRUBIAS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15437	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RAUL JIMENEZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15438	31	REFURBISH/UPGRADE ONTARIO UPS LCNG INFRASTRUCTURE	UNITED PARCEL SERVICE, INC	\$246,707.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15442	32	REPLACE 1 OFF-ROAD VEHICLE	CITY OF WHITTIER	\$150,319.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15443	32	REPOWER 189 CNG BUSES	ORANGE CO TRANSPORTATION AUTHORITY	\$3,866,997.00	
27	INFORMATION MANAGEMENT	C15446	01	SHORT- AND LONG-TERM SYSTEMS DEVELOPMENT, MAINTENANCE AND SUPPORT SERVICES	SIERRA CYBERNETICS INC	\$192,500.00	
27	INFORMATION MANAGEMENT	C15447	01	SHORT AND LONG-TERM SYSTEMS DEVELOPMENT, MAINTENANCE AND SUPPORT SERVICES	AGREEYA SOLUTIONS, INC	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15448	31	VERIFY FAST CHARGING SITES FOR DC FAST CHARGE NETWORK	UNIVERSITY OF CALIFORNIA-LOS ANGELES	\$10,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15449	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FAUSTINO ANDRADE JR.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15450	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LEINCO ENTERPRISES, INC.	\$250,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15451	80	REPLACE 1 OFF-ROAD VEHICLE	ADELANTE GRADING, LLC	\$64,883.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15452	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DAVE HILCHEY	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15453	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JIM FOLEY	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15454	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ELI'S TRANSPORTATION, INC.	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15455	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SOUTH COAST TRANSPORTATION & DIST. INC.	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15456	81	PROP 1B TRUCK REPLACEMENT PROGRAM	TEODULO HERNANDEZ	\$40,000.00	

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<b>DEPT ID</b>	<b>DEPT NAME</b>	<b>CONTRACT NUMBER</b>	<b>FUND CODE</b>	<b>DESCRIPTION</b>	<b>VENDOR NAME</b>	<b>CONTRACT AMOUNT</b>	<b>FOOT NOTE</b>
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15458	32	REPLACEMENT OF 1 OFF-ROAD VEHICLE	MIKE DREWS CONSTRUCTION CO., INC	\$154,421.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15460	32	REPLACEMENT OF 1 OFF-ROAD VEHICLE	T&M PROJECTS INC. DBA T&M CONSTRUCTION	\$207,731.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15461	80	REPLACEMENT OF 7 OFF-ROAD VEHICLES	MOUNTAIN TOP QUARRIES, LLC	\$2,255,953.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15462	32	REPLACEMENT OF 3 OFF-ROAD VEHICLES	P & D DAIRY	\$285,747.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15463	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ROBERTO RODRIGUEZ MADRIGAL	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15464	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FREDY A SANTOS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15466	80	REPLACEMENT OF 1 OFF-ROAD VEHICLE	J & C TRACTOR SERVICE, INC	\$44,236.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15467	80	REPOWER 1 OFF-ROAD VEHICLE	POWER MOVE, INC.	\$52,066.00	
27	INFORMATION MANAGEMENT	C15468	01	SHORT AND LONG-TERM SYSTEMS DEVELOPMENT, MAINTENANCE AND SUPPORT SERVICES	VARSUN ETECHNOLOGIES GROUP, INC	\$375,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15469	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FAUSTINO S. RAMIREZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15470	32	REPOWER 24 OFF-ROAD VEHICLES	RRM PROPERTIES, LTD	\$2,464,484.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15471	32	REPLACEMENT OF 1 OFF-ROAD VEHICLE	SOUTHERN CALIFORNIA LANDSCAPE SUPPLY	\$219,456.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15472	32	REPOWER 1 OFF-ROAD VEHICLE	DUSTIN SMITH EQUIPMENT, INC.	\$48,089.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15473	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CR&R INCORPORATED	\$700,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15474	32	REPLACEMENT OF 1 OFF-ROAD VEHICLE	DAKENO, INC.	\$52,624.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15475	32	REPLACEMENT OF 1 OFF-ROAD VEHICLE	PROGRESSIVE LAND CLEARING	\$45,611.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15476	32	REPLACE 15 OFF-ROAD VEHICLES	ALTA NURSERY, INC	\$187,125.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15477	80	REPOWER OF 3 AND REPLACEMENT OF 2 OFF-ROAD VEHICLES	T & W PARKS CONSTRUCTION INC	\$1,340,171.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15478	32	REPLACEMENT OF 2 OFF-ROAD VEHICLES	FERNANDO LOPEZ FUENTES	\$251,640.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15479	32	REPLACEMENT OF 7 OFF-ROAD VEHICLES	BOOTSMA SILVA FARMS	\$181,333.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15480	32	REPLACEMENT OF 2-FOR-1 OFF-ROAD VEHICLE	K.O.B. INC DBA WEST END MATERIAL SUPPLY	\$37,341.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15481	32	REPLACEMENT OF 2 EXISTING DIESEL EXCAVATORS WITH ONE NEW DIESEL EXCAVATOR	L & S CONSTRUCTION, INC	\$179,270.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15482	32	REPLACEMENT OF 2 OFF-ROAD VEHICLES	NORTH COUNTY SAND & GRAVEL, INC.	\$423,347.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15483	32	REPLACEMENT OF 3 OFF-ROAD VEHICLES FOR 1 NEW ROUGH TERRAIN FORKLIFT	SAN-MAR CONSTRUCTION, CO. INC	\$54,549.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15484	32	REPOWER OF 1 OFF-ROAD VEHICLE	WOOD BROS TRUCKING EQUIP RENTAL, INC.	\$116,017.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15486	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ROSENDO JUAREZ	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15487	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SACER ENTERPRISES LLC	\$25,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15488	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MARIO ALDANA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15489	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ALAMEDA CONSTRUCTION SERVICES INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15491	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JM & MM ENTERPRISES INC.	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15492	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE PERAZA	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15493	81	PROP 1B TRUCK REPLACEMENT PROGRAM	EDGAR A. ESQUIVEL	\$40,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15494	01	SACRAMENTO LEGISLATIVE REPRESENTATION	GONZALEZ, QUINTANA & HUNTER, LLC	\$207,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15495	01	SACRAMENTO LEGISLATIVE REPRESENTATION	JOE A GONSALVES & SON	\$143,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15497	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SERGIO TOVALIN	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15498	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ROBERTO MAGALLON	\$35,000.00	

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16	ADMINISTRATIVE & HUMAN RESOURCES	C15499	01	CARPET REPLACEMENT ON SELECT FLOORS AT THE DIAMOND BAR HEADQUARTERS	SIGNATURE FLOORING, INC.	\$99,107.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15500	27	REPLACE 1500 MODEL BR500 BACKPACK BLOWERS FOR USE BY COMMERCIAL GARDENERS/LANDSCAPERS	PACIFIC STIHL	\$281,955.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C15503	01	CAFETERIA SERVICES AT SCAQMD HEADQUARTERS	CALIFORNIA DINING SERVICES	\$0.00	1
20	MEDIA OFFICE	C15504	80	2015 LAWNMOWER EXCHANGE PROGRAM - OUTREACH	WESTBOUND COMMUNICATIONS INC	\$75,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15507	31	TECHNICAL ASSISTANCE WITH ALTERNATIVE FUELS, EMISSIONS ANALYSIS, AND COMBUSTION TECHNOLOGIES	JERALD A COLE	\$30,000.00	
04	FINANCE	C15508	01,22	AUDIT OF AB2766 FEE REVENUE RECIPIENTS FOR FY 2011-12 & 2012-13	SIMPSON & SIMPSON, CPAs	\$94,260.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15509	32	REPOWER 1 MAIN ENGINE ON A MARINE VESSEL	RICHARD T. HARPER	\$107,100.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15510	32	REPOWER 2 MAIN AND 1 AUXILIARY ENGINES ON 1 MARINE VESSEL	CALIFORNIA BLU	\$153,850.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15513	32	REPOWER OF 1 MAIN ENGINE ON A MARINE VESSEL	BRIAN SHAFER	\$136,224.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15514	32	REPOWER 1 MAIN ENGINE ON A MARINE VESSEL	KENTON EFHAN	\$115,654.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15515	58	AB1318 INSTALLATION OF SOLAR PHOTOVOLTAIC GROUND MOUNT SYSTEM	RENOVA ENERGY CORP.	\$1,200,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15518	32	REPLACEMENT OF 3 OFF-ROAD VEHICLES	DAYLIGHT TRANSPORT, LLC	\$236,286.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15519	32	REPLACEMENT OF 5 OFF-ROAD VEHICLES	C & R FARMS, INC	\$717,300.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15520	32	REPLACEMENT OF 6 OFF-ROAD VEHICLES	DEPENDABLE HIGHWAY EXPRESS, INC.	\$568,670.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15521	32	RETROFIT 12 OFF-ROAD VEHICLES	SA RECYCLING LLC	\$234,320.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15525	32	REPOWER 1 MAIN ENGINE ON 1 MARINE VESSEL	JOSE CESENA	\$85,850.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15530	32	REPOWER ONE OFF-ROAD VEHICLE	EARTH TEK ENGINEERING CORP.	\$121,037.00	



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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15531	80	REPOWER 4 OFF-ROAD VEHICLES	PEED EQUIPMENT COMPANY	\$1,056,210.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15532	32	REPLACEMENT OF 3 OFF-ROAD VEHICLES	CITY OF MORENO VALLEY	\$49,412.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15534	80	REPLACEMENT OF 2 AND REPOWER OF 3 OFF-ROAD VEHICLES	SAGE GREEN, LLC	\$1,569,685.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15535	32	REPOWER 2 MAIN ENGINES ON 1 MARINE VESSEL	FRANK SARDEGNA	\$195,500.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15536	32	REPOWER 2 MAIN AND W AUXILIARY ENGINES ON 1 MARINE VESSEL	MOUNTAIN AND SEA EDUCATIONAL ADVENTURES	\$442,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15537	32	REPOWER 2 MAIN AND 1 AUXILIARY ENGINES ON A MARINE VESSEL	IGOR MAMIN	\$253,300.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15538	32	REPOWER 2 MAIN AND 1 AUXILIARY ENGINE ON 1 MARINE VESSEL	JONATHAN BATTS	\$245,650.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15539	32	REPOWER 2 MAIN ENGINES ON A MARINE VESSEL	SEA BASS CHARTERS, INC.	\$226,100.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15541	56	ENHANCED FLEET MODERNIZATION PROGRAM	FOUNDATION FOR CALIF COMMUNITY COLLEGES	\$225,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15542	32	REPOWER OF 1 MAIN ENGINE AND 2 AUXILIARY ENGINES ON 1 MARINE VESSEL	THANH NGUYEN	\$255,850.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15546	32	REPOWER OF 2 MAIN AND 1 AUXILIARY ENGINES ON 2 MARINE VESSELS	CAL CRYSTAL SEA , LLC	\$420,817.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15548	32	REPOWER OF 1 MAIN AND 1 AUXILIARY ENGINES ON 1 MARINE VESSEL	J DELUCA FISH COMPANY, INC.	\$291,550.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15549	32	REPOWER OF 2 MAIN ENGINES ON A MARINE VESSEL	PURSUIT SPORTFISHING, LLC	\$238,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15550	32	REPOWER 2 MAIN ENGINES ON A MARINE VESSEL	SEAWAY COMPANY OF CATALINA	\$235,301.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15552	32	REPOWER 2 MAIN AND 1 AUXILIARY ENGINE ON 1 MARINE VESSEL	PFLEGER INSTITUTE OF ENVIRONMENTAL	\$245,889.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15556	32	REPOWER OF 1 MAIN ENGINE AND 1 AUXILIARY ENGINE ON 1 MARINE VESSEL	MEO NGUYEN	\$135,150.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15558	32	REPOWER 1 MAIN ENGINE ON 1 MARINE VESSEL	SCOTT W HOWELL	\$109,650.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15559	32	REPOWER 2 MAIN ENGINES ON 1 MARINE VESSEL	RONALD G WARREN	\$162,350.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15562	32	REPOWER 1 MAIN ENGINE ON A MARINE VESSEL	KENT JACOBS	\$135,297.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15563	32	REPOWER OF 1 MAIN ENGINE ON 1 MARINE VESSEL	JASON KROL	\$94,350.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15564	32	REPOWER OF 1 MAIN ENGINE ON 1 MARINE VESSEL	MARC ROSATI	\$97,750.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15565	32	REPOWER OF ONE MAIN ENGINE ON A MARINE VESSEL	DARREL WILSON	\$111,735.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15567	32	REPOWER OF 2 MAIN AND 1 AUXILIARY ENGINES ON 1 MARINE VESSEL	F/V TRITON, INC	\$242,250.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15568	32	REPOWER 2 MAIN AND 1 AUXILIARY ENGINE ON 1 MARINE VESSEL	MARK HERITAGE	\$123,964.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15569	81	PROP 1B TRUCK REPLACEMENT PROGRAM	HASCO OIL CO., INC	\$35,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15570	81	PROP 1B 3-WAY TRUCK REPLACEMENT	HASCO OIL CO., INC	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15571	32	PROVIDE UP TO 4,000 LAWNMOWERS TO SUPPORT 2015 LAWN MOWER EXCHANGE PROGRAM	BLACK & DECKER (US) INC	\$348,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15573	32	REPOWER OF 1 MAIN ENGINE ON 1 MARINE VESSEL	GENE STIVERS	\$107,813.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15575	32	REPOWER 6 MAIN ENGINES ON 3 MARINE VESSELS	HARBOR DOCKSIDE, INC.	\$222,452.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15576	71	SCAQMD CNG STATION MAINTENANCE AND MANAGEMENT	TRILLIUM USA COMPANY	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15578	56	PROVIDE OUTREACH AND MARKETING ACTIVITIES TO SUPPORT THE ENHANCED FLEET MODERNIZATION PROGRAM	GLADSTEIN, NEANDROSS & ASSOCIATES	\$200,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15579	32	REPOWER 2 MAIN AND 2 AUXILIARY ENGINES ON ONE MARINE VESSEL	CHRISTIE DOAN	\$243,100.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15581	27	SCRAP GASOLINE LAWN MOWERS AFTER DRAINING THE FUEL SAFELY AT THE LAWN MOWER EXCHANGE SITES AND PROVIDE TRANSPORTATION FROM THE SITES	DICK'S AUTO WRECKERS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15582	32	PURCHASE UP TO 4000 CORDLESS ELECTRIC MOWERS	THE GREENSTATION	\$232,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15583	27	PROVIDE SUPPORT SERVICES AT THE LAWN MOWER EXCHANGE EVENTS	PARKING CONCEPTS INC	\$20,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15586	56	ENHANCED FLEET MODERNIZATION PROGRAM	OPUS INSPECTION INC	\$200,000.00	
27	INFORMATION MANAGEMENT	C15587	01	SHORT AND LONG-TERM SYSTEMS DEVELOPMENT, MAINTENANCE AND SUPPORT SERVICES	PRELUDE SYSTEMS, INC.	\$72,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15589	36	COMMERCIAL GRADE ELECTRIC LAWN & GARDEN EQUIPMENT DEMONSTRATION PROGRAM	MEAN GREEN PRODUCTS LLC	\$310,394.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15592	81	OPERATE 1 DIESEL TRUCK	GAIL MATERIALS	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15594	81	OPERATE 1 DIESEL TRUCK	INLAND EROSION CONTROL SERVICES, INC	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15595	32	REPLACE 4 OFF-ROAD VEHICLES WITH 2 RETROFITTED OFF-ROAD VEHICLES	RENTRAC INC	\$2,197,900.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15598	36	COMMERCIAL GRADE ELECTRIC LAWN & GARDEN EQUIPMENT DEMONSTRATION PROGRAM	PACIFIC STIHL	\$35,298.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15605	32	OPERATE ONE MARINE VESSEL	ABC BARGE & EQUIPMENT, INC	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15615	32	OPERATE 1 MARINE VESSEL	A & T SMITH BOATS, LLC	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15617	32	OPERATE 11 FORKLIFTS	WEST COAST EQUIPMENT LLC	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G14476	80	REPLACE UP TO 5 CNG TANKS IN SCHOOL BUSES	PUPIL TRANSPORTATION COOPERATIVE	\$100,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G14477	80	REPLACE UP TO 3 CNG TANKS ON SCHOOL BUSES	ONTARIO-MONTCLAIR SCHOOL DISTRICT	\$60,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G14488	80	REPLACE CNG TANKS ON UP TO 13 SCHOOL BUSES	MONTEBELLO UNIFIED SCHOOL DISTRICT	\$260,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G14511	80	RETROFIT 13 DIESEL SCHOOL BUSES WITH THERMACAT DPF	CHAFFEY JOINT UNION HIGH SCHOOL DISTRICT	\$260,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G15134	80	REPLACE 6 CNG TANKS ON SCHOOL BUSES	PUPIL TRANSPORTATION COOPERATIVE	\$120,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G15312	80	REPLACE 1 CNG TANK ON 1 SCHOOL BUS	MOUNTAIN VIEW SCHOOL DISTRICT	\$20,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	G15313	80	REPLACE 3 CNG TANKS ON 3 SCHOOL BUSES	MONTEBELLO UNIFIED SCHOOL DISTRICT	\$60,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G15440	80	REPLACE 1 CNG TANK ON 1 SCHOOL BUS	DESERT SANDS UNIFIED SCHOOL DISTRICT	\$20,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G15522	80	LOWER EMISSION SCHOOL BUS TANK RETROFIT PROGRAM	COLTON JOINT UNIFIED SCHOOL DISTRICT	\$180,000.00	
44	MSRC	ML06071	23	PURCHASE 3 CNG VEHICLES AND INSTALL A CNG FUELING STATION	CITY OF SANTA MONICA	\$149,925.00	
44	MSRC	ML09047	23	MODIFY VEHICLE MAINTENANCE FACILITY	COUNTY OF LOS ANGELES	\$400,000.00	
44	MSRC	ML11024	23	PURCHASE 3 HEAVY-DUTY CNG VEHICLES	COUNTY OF LOS ANGELES	\$90,000.00	
44	MSRC	ML12049	23	ELECTRIC VEHICLE CHARGING INFRASTRUCTURE	CITY OF RIALTO	\$30,432.00	
44	MSRC	ML14010	23	STREET SWEEPING OPERATIONS	CITY OF CATHEDRAL CITY	\$25,000.00	
44	MSRC	ML14011	23	IMPLEMENT PALM SPRINGS BICYCLE PROJECTS	CITY OF PALM SPRINGS	\$79,000.00	
44	MSRC	ML14012	23	PURCHASE 7 HEAVY-DUTY ON-ROAD LPG VEHICLES AND INSTALL 6 EV CHARGING STATIONS	CITY OF SANTA ANA	\$244,000.00	
44	MSRC	ML14014	23	INSTALL EV CHARGING STATIONS	CITY OF TORRANCE	\$56,000.00	
44	MSRC	ML14016	23	PURCHASE TWO HEAVY-DUTY NATURAL GAS VEHICLES AN EXPAND CNG STATION	CITY OF ANAHEIM	\$380,000.00	
44	MSRC	ML14018	23	PURCHASE 27 HEAVY-DUTY NATURAL GAS VEHICLES	CITY OF LOS ANGELES	\$810,000.00	
44	MSRC	ML14019	23	INSTALL EV CHARGING AND BICYCLE INFRASTRUCTURE	CITY OF CORONA	\$178,263.00	
44	MSRC	ML14020	23	SAN GABRIEL BIKE TRAIL UNDERPASS IMPROVEMENTS	COUNTY OF LOS ANGELES	\$150,000.00	
44	MSRC	ML14021	23	INSTALL A CLASS 1 BIKEWAY	COUNTY OF RIVERSIDE	\$250,000.00	
44	MSRC	ML14028	23	EXPAND CNG STATION	CITY OF FULLERTON	\$126,950.00	
44	MSRC	ML14029	23	SAN DIEGO CREEK BIKEWAY IMPROVEMENTS	CITY OF IRVINE	\$90,500.00	
44	MSRC	ML14030	23	BICYCLE INFRASTRUCTURE & EDUCATION	COUNTY OF LOS ANGELES	\$425,000.00	
44	MSRC	ML14031	23	PURCHASE 3 HEAVY-DUTY NATURAL GAS VEHICLES	COUNTY OF RIVERSIDE	\$90,000.00	
44	MSRC	ML14032	23	EXPAND CNG FUELING STATION AND INSTALL BICYCLE LOCKERS	CITY OF RANCHO CUCAMONGA	\$113,990.00	

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44	MSRC	ML14033	23	PURCHASE 2 HEAVY-DUTY CNG VEHICLES	CITY OF IRVINE	\$60,000.00	
44	MSRC	ML14034	23	INSTALL EV CHARGING STATIONS	CITY OF LAKE ELSINORE	\$56,700.00	
44	MSRC	ML14049	23	PURCHASE VEHICLE, INSTALL EV CHARGING & BIKE INFRASTRUCTURE	CITY OF MORENO VALLEY	\$105,000.00	
44	MSRC	ML14050	23	YUCAIPA BICYCLE LANES	CITY OF YUCAIPA	\$84,795.00	
44	MSRC	ML14051	23	INSTALL ONE MILE SEGMENT OF CLASS I BIKEWAY COMPLETING THE LARGER "THE TRACKS AT BREA" BICYCLE TRAIL	CITY OF BREA	\$450,000.00	
44	MSRC	ML14054	23	UPGRADE MAINTENANCE FACILITY	CITY OF TORRANCE	\$350,000.00	
44	MSRC	ML14055	23	HIGHLAND BICYCLE PROJECTS	CITY OF HIGHLAND	\$500,000.00	
44	MSRC	ML14056	23	INSTALL 15.9 MILES OF CLASS II BICYCLE LANE IMPROVEMENTS	CITY OF REDLANDS	\$125,000.00	
44	MSRC	ML14062	23	EXPAND EXISTING CNG FUELING STATION	CITY OF SAN FERNANDO	\$387,091.00	
44	MSRC	ML14064	23	PURCHASE 2 HEAVY-DUTY VEHICLES	CITY OF CLAREMONT	\$60,000.00	
44	MSRC	ML14065	23	INSTALL EV CHARGING STATIONS	CITY OF ORANGE	\$10,000.00	
44	MSRC	ML14066	23	INSTALL SEGMENT OF SOUTH PASADENA BIKEWAY	CITY OF SOUTH PASADENA	\$142,096.00	
44	MSRC	ML14068	23	INSTALL EV CHARGING STATION(S)	CITY OF SOUTH PASADENA	\$10,183.00	
44	MSRC	ML14071	23	ELECTRIC VEHICLE CHARGING INFRASTRUCTURE	CITY OF MANHATTAN BEACH	\$22,485.00	
44	MSRC	ML14072	23	PURCHASE 3 CNG VEHICLES, INSTALL 4 EV CHARGING STATIONS AND INSTALL 20 BIKE RACKS	CITY OF CATHEDRAL CITY	\$136,000.00	
44	MSRC	MS14001	23	IMPLEMENT TRANSIT SERVICE TO DODGER STADIUM	LOS ANGELES COUNTY METROPOLITAN	\$1,216,637.00	
44	MSRC	MS14008	23	IMPLEMENT EXPRESS BUS SERVICE TO ORANGE COUNTY FAIR	ORANGE CO TRANSPORTATION AUTHORITY	\$601,187.00	
44	MSRC	MS14046	23	EXPAND PUBLIC ACCESS CNG STATION IN ONTARIO	ONTARIO CNG STATION INC.	\$150,000.00	
44	MSRC	MS14052	23	EXPAND CNG FUELING STATION	ARCADIA UNIFIED SCHOOL DISTRICT	\$78,000.00	
44	MSRC	MS14053	23	EXPAND CNG FUELING STATION	UPLAND UNIFIED SCHOOL DISTRICT	\$175,000.00	
44	MSRC	MS14057	23	SIGNAL SYNCHRONIZATION PROGRAM	LOS ANGELES COUNTY METROPOLITAN	\$1,250,000.00	

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44	MSRC	MS14059	23	SIGNAL SYNCHRONIZATION PARTNERSHIP PROGRAM	RIVERSIDE COUNTY TRANSPORTATION COMM	\$1,250,000.00	
44	MSRC	MS14072	23	SIGNAL SYNCHRONIZATION PARTNERSHIP PROGRAM	SAN BERNARDINO ASSOCIATED GOVERNMENTS	\$1,250,000.00	
44	MSRC	MS14073	23	IMPLEMENT ANAHEIM CIRCULATOR SERVICE	ANAHEIM TRANSPORTATION NETWORK	\$221,312.00	
44	MSRC	MS14074	23	INSTALL CNG FUELING STATION AND MODIFY MAINTENANCE FACILITY	MIDWAY CITY SANITARY DISTRICT	\$250,000.00	
44	MSRC	MS14077	23	INSTALL LIMITED ACCESS CNG STATION	LOS ANGELES COUNTY SANITATION DISTRICT	\$175,000.00	
44	MSRC	MS14080	23	EXPAND RENEWABLE NATURAL GAS (RNG) FUELING STATION AND MODIFY MAINTENANCE FACILITY	CR&R INCORPORATED	\$249,954.00	
44	MSRC	MS14081	23	EXPAND CNG FUELING STATION AND MODIFY MAINTENANCE FACILITY	CR&R INCORPORATED	\$175,000.00	
44	MSRC	MS14084	23	EXPAND CNG FUELING STATION	US AIR CONDITIONING DISTRIBUTORS	\$100,000.00	
44	MSRC	MS14088	23	IMPLEMENT SPECIAL METROLINK SERVICE TO AUTO CLUB SPEEDWAY	SO CALIFORNIA REGIONAL RAIL AUTHORITY	\$79,660.00	
44	MSRC	MS14089	23	ENHANCED FLEET MODERNIZATION PROGRAM	TOP SHELF CONSULTING LLC	\$200,000.00	
44	MSRC	MS14090	23	EXPAND CNG FUELING STATION	CITY OF MONTEREY PARK	\$225,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	XC14376	81	PROP 1B TRUCK REPLACEMENT PROGRAM	NATIONAL READY MIXED CONCRETE CO.	\$250,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	XC14550	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE M. SOTELO	\$80,000.00	
<b>Subtotal</b>						<b>\$139,872,751.00</b>	

**Competitive-Executive Officer Approved**

16	ADMINISTRATIVE & HUMAN RESOURCES	C15025	01	MEDICAL SERVICE PROVIDER	KAISER FOUNDATION HEALTH PLAN	\$15,000.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C15026	01	PROVIDE OCCUPATIONAL HEALTH SERVICES	UNIVERSITY OF CALIFORNIA - IRVINE	\$30,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15610	01	CONDUCT ENGINEERING SERVICES AT SCAQMD HEADQUARTERS FOR THE UPGRADE AND EXPANSION OF SCAQMD'S ELECTRIC VEHICLE CHARGING INFRASTRUCTURE	GOSS ENGINEERING, INC	\$50,000.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C15629	01	EXTERIOR BUILDING CLEANING, ROOF CLEANING, SOLAR PANEL CLEANING AND INTERIOR AND EXTERIOR WINDOW WASHING	H S G PROFESSIONAL WINDOW CLEANERS INC	\$53,472.00	
27	INFORMATION MANAGEMENT	C15670	01	WEBSITE REVIEW AND EVALUATION	XIVIC INC	\$7,500.00	
27	INFORMATION MANAGEMENT	C15671	01	WEBSITE REVIEW AND EVALUATION	360 BUSINESS CONSULTING	\$8,700.00	
<b>Subtotal</b>						<b>\$164,672.00</b>	

**Sole Source - Board Approved**

44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14204	31	SO CAL EV INFRASTRUCTURE MOA	ASSOCIATED OF LOS ANGELES	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14207	31	SO CAL EV INFRASTRUCTURE MOA	CITY OF PALMDALE	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14208	31	SO CAL EV INFRASTRUCTURE MOA	CITY OF LAKE ELSINORE	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14210	31	SO CAL EV INFRASTRUCTURE MOA	CALIFORNIA STATE UNIVERSITY-LONG BEACH	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14256	31	DEVELOP AND DEMONSTRATE V2G TECHNOLOGY	NATIONAL STRATEGIES, LLC	\$250,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14311	31	INSTALL CNG FUELING STATION IN MURRIETA	SOUTHERN CALIFORNIA GAS COMPANY	\$217,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14375	61	DATA COLLECTION & ANALYSIS OF ZERO-EMISSION CARGO TRANSPORTATION DEMONSTRATION	NATIONAL RENEWABLE ENERGY LAB	\$200,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15020	31	DEVELOP SAMPLING AND TESTING PROTOCOLS FOR ANALYZING IMPURITIES IN HYDROGEN	UNIVERSITY OF CALIFORNIA - IRVINE	\$114,500.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15021	31,17	ELECTRIC YARD TRUCK UPGRADE AND DEMONSTRATION	TRANSPORTATION POWER, INC.	\$405,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15347	31	DEVELOP RETROFIT TECHNOLOGY FOR NG ENGINES & IN-USE EMISSIONS TESTING OF ON-ROAD HEAVY DUTY TRUCKS	WEST VIRGINIA UNIVERSITY RESEARCH CORP	\$340,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15382	31	INSTALL ELECTRIC CHARGING INFRASTRUCTURE	CHARGEPOINT, INC	\$162,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15388	31	PARTICIPATE IN CaFCP FOR CALENDAR YEAR 2014 AND PROVIDE SUPPORT FOR REGIONAL COORDINATOR	BEVILACQUA-KNIGHT INC	\$137,800.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15389	55	CREATE HYDROGEN READINESS IN EARLY MARKETS PLAN, OUTREACH AND BEST PRACTICES, AND TRAINING	BEVILACQUA-KNIGHT INC	\$282,458.00	
26	PLANNING RULE DEV & AREA SOURCES	C15465	36	SUPPORT DEVELOPMENT OF STUDY DESIGN ON WAREHOUSE TRIP GENERATION RATES	INSTITUTE OF TRANSPORTATION ENGINEERS	\$25,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	MS14058	23	SIGNAL SYNCHRONIZATION PARTNERSHIP PROGRAM	ORANGE CO TRANSPORTATION AUTHORITY	\$1,250,000.00	
<b>Subtotal</b>						<b>\$3,383,758.00</b>	

**Sole Source - Executive Officer Approved**

44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14052	01	LEASE OF 2 PHEV VEHICLES	ALTEC CAPITAL SERVICES, LLC	\$60,244.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C14216	01	HUMAN RESOURCES WEB-BASED SOFTWARE (NEOGOV)	GOVERNMENTJOBS.COM INC	\$21,900.00	
27	INFORMATION MANAGEMENT	C14324	01	WEB SUPPORT SERVICES	CIVIC RESOURCE GROUP LLC	\$10,000.00	
08	LEGAL	C14360	01	OFFICE OF GENERAL COUNSEL DOCUMENT MANAGEMENT SYSTEM	HARBOR LITIGATION SOLUTIONS	\$35,000.00	
08	LEGAL	C14680	01	LEGAL CONSULTATION RELATING TO 2012 AQMP CONTROL MEASURE IND-01	DAVID NAWI	\$75,000.00	
08	LEGAL	C14682	01	ELECTRONIC LEGAL SERVICES/LAW LIBRARY SERVICES - "LEGALEDCENTER" DATABASES	THOMSON REUTERS - WEST PYMT CTR	\$75,000.00	
08	LEGAL	C14683	01	ELECTRONIC LEGAL SERVICES/LAW LIBRARY SERVICES - "CLEAR" DATABASE	THOMSON REUTERS - WEST PYMT CTR	\$1,600.00	
27	INFORMATION MANAGEMENT	C15023	01	MASS EMAIL OPTIMIZATION	GENESIS 1 CONSULTING GROUP	\$40,000.00	



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20	MEDIA OFFICE	C15027	01	YOUTH SPORTS AND HEALTHY CHOICES VIDEO PRODUCTION	GROUP 1 PRODUCTIONS	\$40,000.00	
50	ENGINEERING AND COMPLIANCE	C15279	01	EXIDE MITIGATION PLAN FOR CONSTRUCTION OF RISK REDUCTION MEASURES	TETRA TECH BAS	\$75,000.00	
26	PLANNING RULE DEV & AREA SOURCES	C15341	01	PROVIDE CEQA SUPPORT FOR TESORO REFINERY INTEGRATION PROJECT	CALENVIRO METRICS, LLC	\$50,400.00	
26	PLANNING RULE DEV & AREA SOURCES	C15342	01	EVALUATION OF NOx EMISSION CONTROL TECHNOLOGIES FOR STATIONARY SOURCES LOCATED AT REFINERIES IN THE SCAQMD'S RECLAIM PROGRAM	NORTON ENGINEERING CONSULTANTS, INC	\$75,000.00	
26	PLANNING RULE DEV & AREA SOURCES	C15343	01	EVALUATION OF NOx EMISSION CONTROL TECHNOLOGIES FOR STATIONARY SOURCES LOCATED AT NON-REFINERIES IN THE SCAQMD'S RECLAIM PROGRAM	ETS INC	\$50,000.00	
08	LEGAL	C15439	01	LEGAL COUNSEL AND ADVICE	SCHEPER KIM & HARRIS LLP	\$20,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15445	01	REV. DR. MARTIN LUTHER KING, JR. DAY OF SERVICE FORUM	SNAP PRODUCTIONS	\$11,000.00	
20	MEDIA OFFICE	C15457	01	MEDIA, ADVERTISING, AND PUBLIC OUTREACH CAMPAIGN FOR CHECK BEFORE YOU BURN PROGRAM	ALPUNTO ADVERTISING, INC.	\$68,000.00	
08	LEGAL	C15485	01	OUTSIDE COUNSEL - CONFLICT OF INTEREST	OLSON, HAGEL & FISHBURN LLP	\$35,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15512	01	ENVIRONMENTAL JUSTICE CONFERENCE KEYNOTE SPEAKER SERVICES	JODI F. SOLOMON SPEAKERS BUREAU INC	\$7,500.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15516	01	TECHNICAL ASSISTANCE WITH CONSTRUCTION OF ZERO EMISSIONS GOODS MOVEMENT DEMONSTRATION PROJECT	CORDOBA CORPORATION	\$74,500.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15523	01	PROVIDE EVENT PERFORMERS FOR REV. DR. MARTIN LUTHER KING, JR. DAY OF SERVICE FORUM	MESSAGE MEDIA GROUP	\$3,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15526	01	PROVIDE SPEAKER SERVICES FOR REV. DR. MARTIN LUTHER KING, JR. DAY OF SERVICE FORUM	WREN T. BROWN	\$500.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15527	01	PROVIDE MASTER OF CEREMONIES SERVICES AT REV. DR. MARTIN LUTHER KING, JR. DAY OF SERVICE FORUM	VANESSA WILLIAMS	\$750.00	

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35	LEGISLATIVE & PUBLIC AFFAIRS	C15528	01	PROVIDE MUSICAL SERVICES AT THE REV. DR. MARTIN LUTHER KING, JR. DAY OF SERVICE FORUM	CHARLES HOLT	\$500.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15533	01	ORGANIZE AND COORDINATE THE 2015 CESAR CHAVEZ DAY EVENT	LEE ANDREWS GROUP INC	\$75,000.00	
26	PLANNING RULE DEV & AREA SOURCES	C15544	01	TECNICAL SUPPORT FOR 2012 AQMP MODELING AND ATTAINMENT DEMONSTRATION	SATORU MITSUTOMI	\$20,000.00	
26	PLANNING RULE DEV & AREA SOURCES	C15577	01	PROVIDE SCIENTIFIC, TECHNICAL AND MODELING PEER REVIEW ADVISORY GROUP SERVICES	JIN HUANG	\$7,500.00	
08	LEGAL	C15584	01	PROVIDE EXPERT CONSULTING IN THE AREA OF RULES 1304.2 AND 1304.3	FRANK A. WOLAK	\$25,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15585	01	ENVIRONMENTAL JUSTICE CONFERENCE EMCEE SERVICE	THE COACHING FACTORY LLC	\$800.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15590	01	CONDUCT SURFACE METEOROLOGICAL NETWORK PERFORMANCE AND SYSTEM EVALUATION PROGRAM	SONOMA TECHNOLOGY INC	\$15,862.00	
27	INFORMATION MANAGEMENT	C15597	01	CONDUCT INTERNAL SYMPOSIUM: INTEGRATING SOCIAL MEDIA AND EMAIL MARKETING	GENESIS 1 CONSULTING GROUP	\$34,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15600	01	CESAR CHAVEZ DAY OF COMMEMORATION ENTERTAINMENT SERVICES	CASA 0101, INC	\$1,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15601	01	CESAR CHAVEZ DAY OF COMMEMORATION MUSIC ENTERTAINMENT	COLIBRI ENTERTAINMENT, INC	\$1,200.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15602	01	PROVIDE WHEEL CHAIR SERVICE AT SCAQMD CESAR CHAVEZ DAY OF REMEMBRANCE	CRCD ENTERPRISES	\$1,061.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15648	01	EVENT PLANNING & LOGISTIC SERVICES FOR COMMUNITY OUTREACH & AWARDS RECOGNITION EVENTS	SNAP PRODUCTIONS	\$75,000.00	
26	PLANNING RULE DEV & AREA SOURCES	C15649	01	EVALUATING HEALTH IMPACTS OF UNEMPLOYMENT IN THE SOUTH COAST AIR BASIN	ERDAL TEKIN	\$20,000.00	
08	LEGAL	C15658	01	PROVIDE EXPERTING CONSULTING SERVICES WITH REGARD TO TESORO REFINERY PROJECT	PETROTECH CONSULTANTS LLC	\$60,000.00	

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35	LEGISLATIVE & PUBLIC AFFAIRS	C15660	01	UPDATE, STREAMLINE, IMPROVE, AND CONDUCT MAINTENANCE OF SCAQMD'S APPLE IOS AND ANDROID MOBILE APPS	ZENITHECH LLC	\$38,000.00	
<b>Subtotal</b>						<b>\$1,204,317.00</b>	

**II. OTHER**

**Board Assistant**

**Board Administrative Committee Reviewed/Executive Officer Approved**

02	GOVERNING BOARD	C15000	01	BOARD ASSISTANT SERVICES FOR DENNIS YATES	ROBERT ULLOA	\$56,560.00	16
02	GOVERNING BOARD	C15001	01	BOARD ASSISTANT SERVICES FOR DENNIS YATES	EARL C ELROD	\$56,560.00	16
02	GOVERNING BOARD	C15002	01	BOARD ASSISTANT SERVICES FOR MIGUEL PULIDO	LUIS A PULIDO	\$37,707.00	16
02	GOVERNING BOARD	C15003	01	BOARD ASSISTANT SERVICES FOR DR. CLARK PARKER	MARIA INIGUEZ	\$37,707.00	16
02	GOVERNING BOARD	C15004	01	BOARD ASSISTANT SERVICES FOR SHAWN NELSON	INFRASTRUCTURE GROUP, INC	\$37,707.00	16
02	GOVERNING BOARD	C15005	01	BOARD ASSISTANT SERVICES FOR JUDITH MITCHELL	MARISA KRISTINE PEREZ	\$56,560.50	16
02	GOVERNING BOARD	C15006	01	BOARD ASSISTANT SERVICES FOR JUDITH MITCHELL	CHUNG S. LIU	\$18,853.50	16
02	GOVERNING BOARD	C15007	01	BOARD ASSISTANT SERVICES FOR DR. JOSEPH LYOU	NICOLE NISHIMURA	\$7,707.00	16
02	GOVERNING BOARD	C15008	01	BOARD ASSISTANT SERVICES FOR DR. JOSEPH LYOU	MARK ABRAMOWITZ	\$30,000.00	16
02	GOVERNING BOARD	C15009	01	BOARD ASSISTANT SERVICES FOR JOSIE GONZALES	COUNTY OF SAN BERNARDINO	\$37,707.00	16
02	GOVERNING BOARD	C15010	01	BOARD ASSISTANT SERVICES FOR MICHAEL CACCIOTTI	SHO TAY	\$3,947.40	16
02	GOVERNING BOARD	C15011	01	BOARD ASSISTANT SERVICES FOR MICHAEL CACCIOTTI	RONALD KETCHAM	\$11,000.00	16
02	GOVERNING BOARD	C15012	01	BOARD ASSISTANT SERVICES FOR MICHAEL CACCIOTTI	WILLIAM GLAZIER	\$6,657.00	16

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02	GOVERNING BOARD	C15013	01	BOARD ASSISTANT SERVICES FOR MICHAEL CACCIOTTI	JAMES GLEN DUNCAN	\$8,400.00	16
02	GOVERNING BOARD	C15014	01	BOARD ASSISTANT SERVICES FOR MICHAEL CACCIOTTI	FRANK CARDENAS AND ASSOCIATES	\$7,700.00	16
02	GOVERNING BOARD	C15015	01	BOARD ASSISTANT SERVICES FOR JOE BUSCAINO	JACOB LEE HAIK	\$37,707.00	16
02	GOVERNING BOARD	C15016	01	BOARD ASSISTANT SERVICES FOR JOHN BENOIT	BUFORD A CRITES	\$37,707.00	16
02	GOVERNING BOARD	C15017	01	BOARD ASSISTANT SERVICES FOR BEN BENOIT	WESTERN RIVERSIDE COUNCIL OF GOVERNMENTS	\$37,707.00	16
02	GOVERNING BOARD	C15018	01	BOARD ASSISTANT SERVICES FOR MICHAEL ANTONOVICH	DEBRA S MENDELSON	\$37,707.00	16
02	GOVERNING BOARD	C15019	01	BOARD ASSISTANT SERVICES FOR WILLIAM BURKE	P & L CONSULTING, LLC	\$113,121.00	16
<b>Subtotal</b>						<b>\$678,722.40</b>	

**Other - Executive Officer Approved**

44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15366	31	LICENSE AGREEMENT FOR HYDROGEN FUELING	ENGINEERING, PROCUREMENT & CONSTRUCTION	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15419	31	HYDROGEN DISPENSER TRANSFER AGREEMENT	SUNLINE TRANSIT AGENCY	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15502	01	POMONA AIR MONITORING STATION	DAVID A. CHOI	\$40,800.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15511	01	ONTARIO TUFFSHED AIR MONITORING STATION	TUFF SHED INC.	\$20,400.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15596	01	TRANSFER OF OWNERSHIP OF GASEOUS HYDROGEN ELECTROLYZER, COMPRESSOR, STORAGE TANKS AND ASSOCIATED HYDROGEN EQUIPMENT	US HYBRID CORPORATION	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15644	17	SCHOOL ACCESS MOA	LOS ANGELES UNIFIED SCHOOL DISTRICT	\$0.00	1
<b>Subtotal</b>						<b>\$61,200.00</b>	

**III. SPONSORSHIPS**

**Sponsorship -Executive Officer Approved**

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14622	01	CO-SPONSOR CSULB CEERS STUDENT EDUCATIONAL PROJECT 2014	CALIFORNIA STATE UNIVERSITY- LONG BEACH	\$28,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15145	01	2014 BLACK CHAMBER ANNUAL BANQUET	BLACK CHAMBER OF COMMERCE- ORANGE CO	\$500.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15146	01	INLAND EMPIRE 2014 RIDESHARE WEEK SPONSORSHIP	RIVERSIDE COUNTY TRANSPORTATION COMM	\$1,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15147	01	HEALTHY FONTANA PROGRAM	CITY OF FONTANA	\$1,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15353	01	2ND LA'S GREAT FUTURE GALA SPONSORSHIP	COMMUNITY PARTNERS	\$2,500.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15367	01	SPONSORSHIP OF THE RIALTO FAMILY FESTIVAL	CITY OF RIALTO	\$500.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15368	01	COSPONSOR 9TH ANNUAL TASTE OF SOUL 2014 FAMILY FESTIVAL	LOS ANGELES SENTINEL, INC	\$25,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15381	01	LUNG FORCE WALKS AND EXPO	AMERICAN LUNG ASSOCIATION	\$10,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15505	01	CO-SPONSOR 25TH ANNUAL CRC REAL-WORLD EMISSIONS WORKSHOP	COORDINATING RESEARCH COUNCIL INC	\$5,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15506	01	COSPONSOR THE 2015 CRC MOBILE SOURCE AIR TOXICS WORKSHOP	COORDINATING RESEARCH COUNCIL INC	\$5,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15553	01	SOUTH BAY CITIES OF GOVERNMENTS 16TH ANNUAL GENERAL ASSEMBLY SPONSORSHIP	SOUTH BAY CITIES	\$2,500.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15580	01	SPONSORSHIP OF 34TH ANNUAL MARTHA HIGHTOWER JUNIOR GOLF BENEFIT TOURNAMENT	SOUTHERN AREA YOUTH PROGRAM, INC.	\$1,800.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15603	01	COMPTON JR. POSSE 8TH ANNUAL FUNDRAISER GALA SPONSORSHIP	JR. POSSE YOUTH EQUESTRIAN PROGRAM	\$5,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15604	01	13TH ANNUAL CORN FEED RUN SPONSORSHIP	KIWANIS CLUB OF CHINO	\$2,500.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15613	01	2015 SCAG REGIONAL CONFERENCE AND GENERAL ASSEMBLY	SOUTHERN CALIFORNIA ASSOCIATION OF GOVT	\$5,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15616	01	COSPONSOR THE ASILOMAR 2015 CONFERENCE ON TRANSPORTATION AND ENERGY	UNIVERSITY OF CALIFORNIA- DAVIS	\$30,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15633	01	24TH ANNUAL GENERAL ASSEMBLY AND LEADERSHIP ADDRESS	WESTERN RIVERSIDE COUNCIL OF GOVERNMENTS	\$7,500.00	

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35	LEGISLATIVE & PUBLIC AFFAIRS	C15634	01	2015 RHYTHM AND JOY FESTIVAL	RHYTHM AND JOY FESTIVAL	\$5,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15645	01	SPONSORSHIP OF REGALETTES "WHITE LINEN AFFAIR"	REGALETTES, INC.	\$20,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15655	01	CITY OF SOUTH PASADENA GREEN LIVING EXPO SPONSORSHIP	CITY OF SOUTH PASADENA	\$3,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15656	01	SPONSOR FLINTRIDGE CENTER - 41ST ASSEMBLY COMMUNITY RESOURCE FAIR	FLINTRIDGE CENTER	\$3,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15657	01	CVAG GENERAL ASSEMBLY SPONSORSHIP	COACHELLA VALLEY ASSOC OF GOVERNMENTS	\$1,500.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C15659	01	SPONSOR AMERICAN CANCER SOCIETY RELAY FOR LIFE	AMERICAN CANCER SOCIETY	\$5,000.00	
<b>Subtotal</b>						<b>\$170,300.00</b>	

**IV. MODIFICATIONS**

**Board Approved**

44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10046	31	DEVELOPMENT AND DEMONSTRATION OF RENEWABLE HYDROGEN ENERGY AND FUELING STATION	AIR PRODUCTS & CHEMICALS INC	\$0.00	6
08	LEGAL	C10060	01	PROVIDE EMPLOYEE LITIGATION SERVICES	WILEY PRICE & RADULOVICH	\$75,000.00	
08	LEGAL	C10060	01	PROVIDE EMPLOYEE LITIGATION SERVICES	WILEY PRICE & RADULOVICH	\$75,000.00	
08	LEGAL	C11594	01	LEGAL REPRESENTATION	PERKINS COIE LLP	\$25,000.00	
08	LEGAL	C11594	01	LEGAL REPRESENTATION	PERKINS COIE LLP	\$100,000.00	
08	LEGAL	C12075	01	ENVIRONMENTAL LAW	WOODRUFF SPRADLIN & SMART	\$50,000.00	
08	LEGAL	C12075	01	ENVIRONMENTAL LAW	WOODRUFF SPRADLIN & SMART	\$50,000.00	
08	LEGAL	C12128	01	EMPLOYMENT & LABOR LAW	FISHER & PHILLIPS, LLP	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12308	40	PERFORM WEBSITE SERVICES FOR THE CNGVP	GLADSTEIN, NEANDROSS & ASSOCIATES	\$60,000.00	
08	LEGAL	C12702	01	LEGAL ADVICE FOR LAWSUITS AND ADMINISTRATIVE PROCEEDINGS	SHUTE MIHALY & WEINBERGER LLP	\$10,000.00	
08	LEGAL	C12702	01	LEGAL ADVICE FOR LAWSUITS AND ADMINISTRATIVE PROCEEDINGS	SHUTE MIHALY & WEINBERGER LLP	\$10,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12851	31	CONSTRUCT TWO NEW CNG FUELING STATIONS	CLEAN ENERGY	\$1,000,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13055	17	INSTALL AND MAINTAIN AIR FILTRATION SYSTEMS IN SAN BERNARDINO AND BOYLE HEIGHTS SCHOOLS	IQAIR NORTH AMERICA, INC.	\$170,000.00	
08	LEGAL	C13060	01	LITIGATION COUNSEL	PAUL HASTINGS LLP	\$75,000.00	
08	LEGAL	C13060	01	LITIGATION COUNSEL	PAUL HASTINGS LLP	\$100,000.00	
08	LEGAL	C13060	01	LITIGATION COUNSEL	PAUL HASTINGS LLP	\$200,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13259	31	HYDROGEN STATION OPERATION AND MAINTENANCE FOR FIVE CITIES HYDROGEN PROGRAM	AIR PRODUCTS & CHEMICALS INC	\$90,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C13262	01	WASHINGTON DC LEGISLATIVE REPRESENTATION	KADESH & ASSOCIATES LLC	\$230,945.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C13263	01	WASHINGTON DC LEGISLATIVE REPRESENTATION	CARMEN GROUP, INC	\$109,620.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C13263	01	WASHINGTON DC LEGISLATIVE REPRESENTATION	CARMEN GROUP, INC	\$222,090.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13400	31	DEVELOP HYDROGEN STATION INVESTMENT PLAN	ENERGY INDEPENDENCE NOW COALITION	\$80,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14027	58	COACHELLA VALLEY WEATHERIZATION PROJECT	QUALITY INTERIORS, INC.	\$932,848.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14136	32	REPOWER 4 OFF-ROAD VEHICLES	NORTH COUNTY SAND & GRAVEL, INC.	\$186,265.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14154	01	UPGRADE METEOROLOGICAL SYSTEMS AND DATA COMMUNICATIONS	TECHNICAL AND BUSINESS SYSTEMS	\$20,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14185	31	CONDUCT EDUCATIONAL OUTREACH FOR THE BASIN DC FAST CHARGING NETWORK PROJECT	THREE SQUARES INC.	\$40,000.00	
26	PLANNING RULE DEV & AREA SOURCES	C14188	01	PROVIDE TECHNICAL SUPPORT FOR THE SCAQMD UPPER AIR METEOROLOGICAL MONITORING NETWORK	SONOMA TECHNOLOGY INC	\$100,000.00	
08	LEGAL	C14191	01	PROVIDE LEGAL SERVICES CONCERNING EXIDE BANKRUPTCY PROCEEDINGS	KLEE, TUCHIN, BOGDANOFF & STERN LLP	\$25,000.00	
08	LEGAL	C14191	01	PROVIDE LEGAL SERVICES CONCERNING EXIDE BANKRUPTCY PROCEEDINGS	KLEE, TUCHIN, BOGDANOFF & STERN LLP	\$25,000.00	

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08	LEGAL	C14191	01	PROVIDE LEGAL SERVICES CONCERNING EXIDE BANKRUPTCY PROCEEDINGS	KLEE, TUCHIN. BOGDANOFF & STERN LLP	\$100,000.00	
08	LEGAL	C14191	01	PROVIDE LEGAL SERVICES CONCERNING EXIDE BANKRUPTCY PROCEEDINGS	KLEE, TUCHIN. BOGDANOFF & STERN LLP	\$45,000.00	
08	LEGAL	C14191	01	PROVIDE LEGAL SERVICES CONCERNING EXIDE BANKRUPTCY PROCEEDINGS	KLEE, TUCHIN. BOGDANOFF & STERN LLP	\$75,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14193	58	WEATHERIZATION PROPERTY INSPECTIONS	KLIEWER & ASSOCIATES	\$35,000.00	
08	LEGAL	C14198	01	COUNSEL RAILROAD LITIGATION	SLOVER & LOFTUS	\$25,000.00	
08	LEGAL	C14198	01	COUNSEL RAILROAD LITIGATION	SLOVER & LOFTUS	\$50,000.00	
08	LEGAL	C14198	01	COUNSEL RAILROAD LITIGATION	SLOVER & LOFTUS	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14218	32	REPOWER 8 OFF-ROAD VEHICLES	FINE GRADE EQUIPMENT, INC.	\$203,337.00	
08	LEGAL	C14360	01	OFFICE OF GENERAL COUNSEL DOCUMENT MANAGEMENT SYSTEM	HARBOR LITIGATION SOLUTIONS	\$50,000.00	
08	LEGAL	C14360	01	OFFICE OF GENERAL COUNSEL DOCUMENT MANAGEMENT SYSTEM	HARBOR LITIGATION SOLUTIONS	\$7,500.00	
08	LEGAL	C14360	01	OFFICE OF GENERAL COUNSEL DOCUMENT MANAGEMENT SYSTEM	HARBOR LITIGATION SOLUTIONS	\$45,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14535	58	TECHNICAL ASSISTANCE, IMPLEMENTATION & OUTREACH SUPPORT FOR CARL MOYER PROGRAM	CLEAN FUEL CONNECTION INC	\$50,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14536	81	PROVIDE TECHNICAL ASSISTANCE FOR THE PROP 1B GOODS MOVEMENT PROGRAM	CLEAN FUEL CONNECTION INC	\$150,000.00	
50	ENGINEERING AND COMPLIANCE	C15279	01	EXIDE MITIGATION PLAN FOR CONSTRUCTION OF RISK REDUCTION MEASURES	TETRA TECH BAS	\$990,000.00	
26	PLANNING RULE DEV & AREA SOURCES	C15342	01	EVALUATION OF NOx EMISSION CONTROL TECHNOLOGIES FOR STATIONARY SOURCES LOCATED AT REFINERIES IN THE SCAQMD'S RECLAIM PROGRAM	NORTON ENGINEERING CONSULTANTS, INC	\$12,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15378	23	PROP 1B TRUCK REPLACEMENT PROGRAM	G.O. RODRIGUEZ TRUCKING, INC.	\$50,000.00	
27	INFORMATION MANAGEMENT	C15446	01	SHORT- AND LONG-TERM SYSTEMS DEVELOPMENT, MAINTENANCE AND SUPPORT SERVICES	SIERRA CYBERNETICS INC	\$200,000.00	



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27	INFORMATION MANAGEMENT	C15447	01	SHORT AND LONG-TERM SYSTEMS DEVELOPMENT, MAINTENANCE AND SUPPORT SERVICES	AGREEYA SOLUTIONS, INC	\$30,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15461	80	REPLACEMENT OF 7 OFF-ROAD VEHICLES	MOUNTAIN TOP QUARRIES, LLC	\$49,659.00	
27	INFORMATION MANAGEMENT	C15468	01	SHORT AND LONG-TERM SYSTEMS DEVELOPMENT, MAINTENANCE AND SUPPORT SERVICES	VARUN ETECHNOLOGIES GROUP, INC	\$150,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15507	63	TECHNICAL ASSISTANCE WITH ALTERNATIVE FUELS, EMISSIONS ANALYSIS, AND COMBUSTION TECHNOLOGIES	JERALD A COLE	\$50,000.00	
27	INFORMATION MANAGEMENT	C15587	01	SHORT AND LONG-TERM SYSTEMS DEVELOPMENT, MAINTENANCE AND SUPPORT SERVICES	PRELUDE SYSTEMS, INC.	\$84,500.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	G13212	80	PURCHASE 6 CNG SCHOOL BUSES WITH FIRE SUPPRESSION SYSTEMS AND ASSOCIATED INFRASTRUCTURE	FULLERTON JOINT UNION HIGH SCHOOL DIST	\$0.00	11
44	MSRC	MS11056	23	PROGRAMMATIC OUTREACH SERVICES	THE BETTER WORLD GROUP, INC	\$10,000.00	
44	MSRC	MS14009	23	BUY-DOWN THE COST OF ALTERNATIVE FUEL SCHOOL BUSES	A-Z BUS SALES, INC.	\$45,000.00	
44	MSRC	MS14009	23	BUY-DOWN THE COST OF ALTERNATIVE FUEL SCHOOL BUSES	A-Z BUS SALES, INC.	\$90,000.00	
44	MSRC	MS14009	23	BUY-DOWN THE COST OF ALTERNATIVE FUEL SCHOOL BUSES	A-Z BUS SALES, INC.	\$93,000.00	
44	MSRC	MS14048	23	BUY DOWN THE COST OF ALTERNATIVE FUELED SCHOOL BUSES	BUSWEST, LLC	\$62,000.00	
44	MSRC	MS14048	23	BUY DOWN THE COST OF ALTERNATIVE FUELED SCHOOL BUSES	BUSWEST, LLC	\$434,000.00	
<b>Subtotal</b>						<b>\$7,337,764.00</b>	

**Executive Officer Approved**

44	SCIENCE & TECHNOLOGY ADVANCEMENT	C00013	01	COSTA MESA AIR MONITORING STATION LEASE	EL PACIFIC PROPERTIES/DONALD S ELLIS	\$0.00	2
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08	LEGAL	C01096	01	OUTSIDE COUNSEL - CONFLICT OF INTEREST	OLSON, HAGEL & FISHBURN LLP	\$0.00	6
11	LEGAL	C05025	01	PERSONNEL INVESTIGATION	PUBLIC INTEREST INVESTIGATIONS INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C05100	01	PICO-RIVERA-WHITTIER AIR MONITORING STATION	CITY OF WHITTIER	\$8,064.71	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C07062	31	TECHNICAL ASSISTANCE RELATED TO AIR QUALITY IMPACTS OF REGIONAL GOODS MOVEMENT	THE TIOGA GROUP	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C07215	31	REPOWER 9 DUAL ENGINE SCRAPERS	RENTAC INC	\$0.00	6
11	LEGAL	C07321	01	ADVICE REGARDING PUBLIC FINANCE BONDS, TAXES, FEES, ETC.	STRADLING YOCCA CARLSON & RAUTH	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C08014	32	REPOWER TWO DIESEL TRACTORS AND ONE DIESEL DUAL-ENGINE WATER PULL	COBURN EQUIPMENT	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09142	32	REPOWER TWO DIESEL WATERPULLS	PROWATER INC.	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09295	32	PURCHASE 1 LOW-EMITTING SWITCHER LOCOMOTIVE	AMTRAK	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09364	31	CONSTRUCT/INSTALL CNG REFUELING STATION AND PERFORM GARAGE UPGRADES	RIM OF THE WORLD UNIFIED SCHOOL DISTRICT	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09364	31	CONSTRUCT/INSTALL CNG REFUELING STATION AND PERFORM GARAGE UPGRADES	RIM OF THE WORLD UNIFIED SCHOOL DISTRICT	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09423	59	SCAQMD APPROVED PARTICIPATING DEALERSHIP IN VOUCHER INCENTIVE PROGRAM	INLAND KENWORTH (US) INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09424	59	SCAQMD APPROVED PARTICIPATING DEALERSHIP IN VOUCHER INCENTIVE PROGRAM	LOS ANGELES FREIGHTLINER	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09425	59	SCAQMD APPROVED PARTICIPATING DEALERSHIP IN VOUCHER INCENTIVE PROGRAM	RUSH TRUCK CENTER OF CALIFORNIA	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09426	59	SCAQMD APPROVED PARTICIPATING DEALERSHIP IN VOUCHER INCENTIVE PROGRAM	WESTRUX INTERNATIONAL, INC.	\$0.00	6

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09428	59	SCAQMD APPROVED PARTICIPATING DISMANTLER IN VOUCHER INCENTIVE PROGRAM	ECOLOGY AUTO PARTS, INC.	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09430	59	SCAQMD APPROVED PARTICIPATING DISMANTLER IN VOUCHER INCENTIVE PROGRAM	PICK YOUR PART AUTO WRECKING	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C09432	59	SCAQMD APPROVED PARTICIPATING DISMANTLER IN VOUCHER INCENTIVE PROGRAM	DICK'S AUTO WRECKERS	\$0.00	6
26	PLANNING RULE DEV & AREA SOURCES	C10001	01	STAMPFRAG MEMBER SERVICES	CENTER FOR CONTINUING STUDY-CA ECONOMY	\$0.00	6
26	PLANNING RULE DEV & AREA SOURCES	C10001	01	STAMPFRAG MEMBER SERVICES	CENTER FOR CONTINUING STUDY-CA ECONOMY	\$5,000.00	
26	PLANNING RULE DEV & AREA SOURCES	C10001	01	STAMPFRAG MEMBER SERVICES	CENTER FOR CONTINUING STUDY-CA ECONOMY	\$5,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10007	59	SCAQMD APPROVED PARTICIPATING DISMANTLER IN VOUCHER INCENTIVE PROGRAM	U PICK U SAVE	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10046	31	DEVELOPMENT AND DEMONSTRATION OF RENEWABLE HYDROGEN ENERGY AND FUELING STATION	AIR PRODUCTS & CHEMICALS INC	\$0.00	6
08	LEGAL	C10052	01	PROVIDE EMPLOYEE RELATIONS LITIGATION SERVICES	LIEBERT CASSIDY WHITMORE	\$0.00	6
08	LEGAL	C10060	01	PROVIDE EMPLOYEE LITIGATION SERVICES	WILEY PRICE & RADULOVICH	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10079	32	REPOWER ONE SINGLE ENGINE SCRAPER	ANDREW J. ALVA	\$0.00	6
16	ADMINISTRATIVE & HUMAN RESOURCES	C10178	01	NORCO AIR MONITORING STATION LEASE	DEPARTMENT OF THE NAVY	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10186	32	REPLACE 1 DIESEL RUBBER-TIRED LOADER	WILLIAM KANAYAN CONSTRUCTION	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10463	59	SCAQMD APPROVED PARTICIPATING DEALERSHIP IN VOUCHER INCENTIVE PROGRAM	BOERNER TRUCK CENTER	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10722	01	RE-ESTABLISH TESTING FACILITY & QUANTIFY PM EMISSION REDUCTIONS FROM CHARBROILING OPERATIONS	UNIVERSITY OF CALIFORNIA, RIVERSIDE	\$0.00	6

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10722	01	RE-ESTABLISH TESTING FACILITY & QUANTIFY PM EMISSION REDUCTIONS FROM CHARBROILING OPERATIONS	UNIVERSITY OF CALIFORNIA, RIVERSIDE	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10723	31	RETROFIT A DIGESTER GAS ENGINE WITH NOX AFTERTREATMENT EMISSION CONTROL TECHNOLOGY	EASTERN MUNICIPAL WATER DISTRICT	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11160	59	SCAQMD APPROVED PARTICIPATING DEALERSHIP IN VOUCHER INCENTIVE PROGRAM	ENTERPRISE MOTORS, INC.	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11161	59	SCAQMD APPROVED PARTICIPATING DEALERSHIP IN THE VOUCHER INCENTIVE PROGRAM	TOM'S TRUCK CENTER, INC.	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11163	59	SCAQMD APPROVED RETROFIT DEVICE INSTALLER - VIP PROGRAM	IRONMAN PARTS AND SERVICES	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11175	32	REPOWER AND RETROFIT ONE OFF-ROAD VEHICLE	WILLARD MARINE INC.	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11204	31	ELECTRIC CONVERSION OF FLEET VEHICLES	AC PROPULSION INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11398	81	PROP 1B GOODS MOVEMENT - LOCOMOTIVE CONTRACT	BNSF RAILWAY COMPANY	\$0.00	11
26	PLANNING RULE DEV & AREA SOURCES	C11527	31	SOURCES, COMPOSITION, VARIABILITY & TOXICOLOGICAL CHARACTERISTICS OF ULTRAFINE PARTICLES IN SOUTHERN CALIFORNIA STUDY	UNIVERSITY OF SOUTHERN CALIFORNIA	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11548N	23	NOVATED CONTRACT FROM C11548 MANSFIELD GAS SYSTEMS TO CLEAN ENERGY FOR THE BUY-DOWN INCENTIVE FOR THE PHIL HOME FUELING DEVICE	CLEAN ENERGY	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11549	81	PROP 1B TRUCK REPLACEMENT PROGRAM LEASE TO OWN PROGRAM	CITY NATIONAL BANK	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11550	01	PROP 1B LEASE TO OWN ADMINISTRATION	CALIFORNIA CARTAGE CO, LLC	\$0.00	11
08	LEGAL	C11594	01	LEGAL REPRESENTATION	PERKINS COIE LLP	\$10,000.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C11607	01	NATURAL GAS PURCHASE AGREEMENT	STATE OF CALIFORNIA	\$27,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11608	44	DEMONSTRATION OF REMOTE SENSING FENCELINE MONITORING METHODS AT OIL REFINERIES AND PORTS	UNIVERSITY OF CALIFORNIA-LOS ANGELES	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11615	31	DEVELOPMENT AND DEMONSTRATION OF UP TO 4 HEAVY-DUTY HYDRAULIC HYBRID VEHICLES	PARKER HANNIFIN CORPORATION	\$0.00	6
35	LEGISLATIVE & PUBLIC AFFAIRS	C11738	01	IMPLEMENTATION OF THE AIR QUALITY INSTITUTE (AQI)	CORDOBA CORPORATION	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12021	80	REPOWER AND RETROFIT 4 OFF-ROAD VEHICLES	GEERLINGS EQUIPMENT RENTAL, INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12041	59	SCAQMD APPROVED PARTICIPATING DEALER IN VOUCHER INCENTIVE PROGRAM	KDH USED TRUCK SALES	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12042	59	SCAQMD APPROVED PARTICIPATING DEALER IN VOUCHER INCENTIVE PROGRAM	ARROW TRUCK SALES	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12044	59	SCAQMD APPROVED PARTICIPATING DEALER IN VOUCHER INCENTIVE PROGRAM	TRANSPORTATION COMMERCE INC DBA BEST DEAL TRUCK SALES	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12045	59	SCAQMD APPROVED PARTICIPATING DEALER IN VOUCHER INCENTIVE PROGRAM	BOYLE TRUCKS OF FONTANA, INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12046	59	SCAQMD APPROVED PARTICIPATING DEALER IN VOUCHER INCENTIVE PROGRAM	GIBBS INTERNATIONAL INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12047	59	SCAQMD APPROVED PARTICIPATING DEALER IN VOUCHER INCENTIVE PROGRAM	DYNAMIC TRUCK SALES, INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12050	59	SCAQMD APPROVED PARTICIPATING DISMANTLER IN VOUCHER INCENTIVE PROGRAM	AMERICAN METAL RECYCLING	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12051	59	SCAQMD APPROVED PARTICIPATING DISMANTLER IN VOUCHER INCENTIVE PROGRAM	SOUTHLAND TRUCK & EQUIPMENT	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12053	59	SCAQMD APPROVED PARTICIPATING DISMANTLER IN VOUCHER INCENTIVE PROGRAM	AADLEN BROS AUTO WRECKING	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12054	59	SCAQMD APPROVED PARTICIPATING DISMANTLER IN VOUCHER INCENTIVE PROGRAM	LKQ AUTO PARTS OF CENTRAL CALIFORNIA	\$0.00	6

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12056	59	SCAQMD APPROVED PARTICIPATING DISMANTLER IN VOUCHER INCENTIVE PROGRAM	SAN CLEMENTE TRUCK & AUTO RECYCLING	\$0.00	6
08	LEGAL	C12075	01	ENVIRONMENTAL LAW	WOODRUFF SPRADLIN & SMART	\$0.00	6
27	INFORMATION MANAGEMENT	C12151	01	CONTRACT FOR SYSTEMS DEVELOPMENT, MAINTENANCE AND SUPPORT SERVICES	SIERRA CYBERNETICS INC	\$0.00	6
27	INFORMATION MANAGEMENT	C12157	01	SHORT AND LONG-TERM SYSTEMS DEVELOPMENT, MAINTENANCE AND SUPPORT SERVICES	PRELUDE SYSTEMS, INC.	\$0.00	6
27	INFORMATION MANAGEMENT	C12157	01	SHORT AND LONG-TERM SYSTEMS DEVELOPMENT, MAINTENANCE AND SUPPORT SERVICES	PRELUDE SYSTEMS, INC.	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12174	48	CHARACTERIZATION OF THE PHYSICAL, CHEMICAL, AND BIOLOGICAL PROPERTIES OF PM EMISSIONS, VOCS AND CARBONYL GROUPS FROM UNDER-FIRED CHARBROILERS	UNIVERSITY OF CALIFORNIA, RIVERSIDE	\$0.00	6
16	ADMINISTRATIVE & HUMAN RESOURCES	C12189	01	SERVICE AND MAINTENANCE FOR LEIBERT AIR CONDITIONING EQUIPMENT	KLM, INC	\$8,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12204	32	REPOWER OF 13 OFF-ROAD VEHICLES	SHARMA GENERAL ENGINEERING CONTRACTORS	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12208	31	DETERMINE THE PHYSICAL AND CHEMICAL COMPOSITION & ASSOCIATED HEALTH EFFECTS OF TAILPIPE PM EMISSIONS	UNIVERSITY OF CALIFORNIA, RIVERSIDE	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12208	31	DETERMINE THE PHYSICAL AND CHEMICAL COMPOSITION & ASSOCIATED HEALTH EFFECTS OF TAILPIPE PM EMISSIONS	UNIVERSITY OF CALIFORNIA, RIVERSIDE	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12234	81	INSTALLATION OF A GRID-BASED, SHORE POWER SYSTEMS UP TO TEN BERTHS AT THE PORT OF LOS ANGELES - PROP 1B	CITY OF LOS ANGELES	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12269	32	REPOWER 2 MAIN AND 3 AUXILIARY ENGINES ON 2 MARINE VESSELS	HARBOR BREEZE CORP	\$0.00	11
16	ADMINISTRATIVE & HUMAN RESOURCES	C12272	01	PROVIDE ELEVATOR SERVICE AND PREVENTATIVE MAINTENANCE	THYSSENKRUPP ELEVATOR CORP	\$27,954.00	
27	INFORMATION MANAGEMENT	C12285	01	SHORT AND LONG-TERM SYSTEMS DEVELOPMENT, MAINTENANCE AND SUPPORT SERVICES	CMC AMERICAS INC	\$0.00	6

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12297	58	TECHNICAL ASSISTANCE WITH PROP 1B GOODS MOVEMENT PROGRAM	CLEAN FUEL CONNECTION INC	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12376	31	TECHNICAL ASSISTANCE FOR AIR POLLUTION FORMATION AND CONTROL, ADVANCED TRANSPORTATION TECHNOLOGIES AND SYSTEMS, EMISSIONS MEASUREMENTS AND ANALYSIS, ALTERNATIVE FUEL TECHNOLOGIES, SUSTAINABLE ENERGY SYSTEMS, AND OFF-ROAD VEHICLES AND EQUIPMENT	UNIVERSITY OF CALIFORNIA, RIVERSIDE	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12381	01	TECHNICAL ASSISTANCE RELATED TO EMISSION INVENTORIES, GOODS MOVEMENT AND OFF-ROAD SOURCES	INTEGRA ENVIRONMENTAL CONSULTING, INC.	\$75,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12440	81	PROP 1B TRUCK REPLACEMENT PROGRAM	TEAM CAMPBELL LOGISTICS PACIFIC LLC	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12452	35	INSTALLATION OF UP TO 2 MW SOLAR PV CARPORT, 28 EV CHARGERS AND DEPLOYMENT OF 28 ELECTRIC VEHICLES	CITY OF INDUSTRY	\$0.00	6
08	LEGAL	C12702	01	LEGAL ADVICE FOR LAWSUITS AND ADMINISTRATIVE PROCEEDINGS	SHUTE MIHALY & WEINBERGER LLP	\$0.00	6
08	LEGAL	C12702	01	LEGAL ADVICE FOR LAWSUITS AND ADMINISTRATIVE PROCEEDINGS	SHUTE MIHALY & WEINBERGER LLP	\$0.00	4
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12846	81	PROP 1B TRUCK REPLACEMENT PROGRAM	OCHOA GROUP CORP	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12852	31	UPGRADE EXISTING CNG FUELING STATION AT CITY OF CORONA CORPORATE YARD	CITY OF CORONA	\$0.00	1
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12862	61	DEVELOPMENT OF A CLASS 8 PLUG-IN HYBRID HEAVY-DUTY VEHICLE	VOLVO TECHNOLOGY OF AMERICA INC	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12865	31	DEVELOPMENT OF QUANTITATIVE CELLULAR ASSAYS FOR USE IN UNDERSTANDING THE CHEMICAL BASIS OF AIR POLLUTANT TOXICITY	UNIVERSITY OF CALIFORNIA-LOS ANGELES	\$0.00	6
26	PLANNING RULE DEV & AREA SOURCES	C12881	01	CEQA CONSULTANT ASSISTANT	ENVIRONMENTAL AUDIT INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12888	01	LBUSD AIR MONITORING STATION	LONG BEACH UNIFIED SCHOOL DISTRICT	\$0.00	9

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26	PLANNING RULE DEV & AREA SOURCES	C12897	01	TECHNICAL SUPPORT FOR SCAQMD MEASUREMENTS IN THE COACHELLA VALLEY	TECHNICAL AND BUSINESS SYSTEMS	\$60,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13024	32	REPOWER ONE (1) DIESEL OFF-ROAD VEHICLE	FST SAND & GRAVEL INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13026	32	REPOWER 3 DIESEL OFF-ROAD VEHICLES	LD ANDERSON INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13026	32	REPOWER 3 DIESEL OFF-ROAD VEHICLES	LD ANDERSON INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13035	36	INSTALL 50 KW SOLAR PV ROOFTOP SYSTEM, WITH 1.5MW BATTERY ENERGY STORAGE	CODA ENERGY, LLC	\$0.00	4
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13041	01	TECHNICAL ASSISTANCE WITH EMISSION REDUCTION PROJECTS TO BE IMPLEMENTED UNDER AB 1318 MITIGATION	MELVIN D ZELDIN	\$0.00	6
16	ADMINISTRATIVE & HUMAN RESOURCES	C13054	01	WEST INLAND EMPIRE EMPLOYMENT RELATIONS CONSORTIUM	LIEBERT CASSIDY WHITMORE	\$3,549.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13058	31	DEVELOPMENT OF MICROTURBINE SERIES HYBRID SYSTEM FOR CLASS 7 HEAVY-DUTY VEHICLE APPLICATION	CAPSTONE TURBINE CORPORATION	\$0.00	6
08	LEGAL	C13060	01	LITIGATION COUNSEL	PAUL HASTINGS LLP	\$60,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13066	59	SCAQMD APPROVED PARTICIPATING RETROFIT INSTALLER IN VOUCHER INCENTIVE PROGRAM	A-Z BUS SALES, INC.	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13067	59	SCAQMD APPROVED PARTICIPATING RETROFIT INSTALLER IN VOUCHER INCENTIVE PROGRAM	FLEETSERV	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13068	59	SCAQMD APPROVED PARTICIPATING DISMANTLER IN VOUCHER INCENTIVE PROGRAM	ARROW TRUCK WRECKING, INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13069	59	SCAQMD APPROVED PARTICIPATING DEALER IN VOUCHER INCENTIVE PROGRAM	C&M MOTORS, INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13070	59	SCAQMD APPROVED PARTICIPATING RETROFIT INSTALLER IN VOUCHER INCENTIVE PROGRAM	COMPLETE COACH WORKS	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13072	59	SCAQMD APPROVED PARTICIPATING DEALER IN VOUCHER INCENTIVE PROGRAM	JOHNSON TRUCK CENTERS	\$0.00	6



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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13073	59	SCAQMD APPROVED PARTICIPATING RETROFIT INSTALLER IN VOUCHER INCENTIVE PROGRAM	JOHNSON TRUCK CENTERS	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13075	59	SCAQMD APPROVED PARTICIPATING DEALER IN VOUCHER INCENTIVE PROGRAM	RIVERVIEW INTERNATIONAL TRUCKS LLC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13076	59	SCAQMD APPROVED PARTICIPATING DEALER IN VOUCHER INCENTIVE PROGRAM	SANTA MAGARITA FORD	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13077	59	SCAQMD APPROVED PARTICIPATING DEALER IN VOUCHER INCENTIVE PROGRAM	PENSKE CHVROLET OF CERRITOS	\$0.00	6
49	STA CF/1B/CMP	C13155	01	LEASE 2 FUEL CELL VEHICLES	FLETCHER JONES MOTOR CARS, INC	\$14,597.28	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13169	01	ASSESSMENT OF PERFORMANCE AND OPERATIONAL ISSUES WITH LNG TRUCKS UNDER PROP 1B PROGRAM	GLADSTEIN, NEANDROSS & ASSOCIATES	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13194	01	PROVIDE TECHNICAL ASSISTANCE WITH ALTERNATIVE FUELS, RENEWABLE ENERGY AND ELECTRIC VEHICLES	CLEAN FUEL CONNECTION INC	\$10,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13198	31,17	TECHNICAL ASSISTANCE WITH ALTERNATIVE FUELS, EMISSIONS ANALYSIS AND ON-ROAD SOURCES	GLADSTEIN, NEANDROSS & ASSOCIATES	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13259	31	HYDROGEN STATION OPERATION AND MAINTENANCE FOR FIVE CITIES HYDROGEN PROGRAM	AIR PRODUCTS & CHEMICALS INC	\$0.00	6
08	LEGAL	C13312	01	LEGAL COUNSEL FOR CONFLICTS OF INTEREST/PUBLIC LAW ISSUES	BURKE, WILLIAMS & SORENSEN, LLP	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13395	59	SCAQMD APPROVED PARTICIPATING RETROFIT INSTALLER IN VOUCHER INCENTIVE PROGRAM	DIESEL EXHAUST AND EMISSIONS LLC	\$0.00	6
35	LEGISLATIVE & PUBLIC AFFAIRS	C13413	01	PUBLIC OPINION SURVEY RESEARCH	GOMEZ RESEARCH	\$0.00	6
35	LEGISLATIVE & PUBLIC AFFAIRS	C13413	01	PUBLIC OPINION SURVEY RESEARCH	GOMEZ RESEARCH	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13418	31	SO CAL EV INFRASTRUCTURE MOA	CITY OF CLAREMONT	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13420	31	SO CAL EV INFRASTRUCTURE MOA	UNIVERSITY OF CALIFORNIA - IRVINE	\$0.00	6

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13421	31	SO CAL EV INFRASTRUCTURE MOA	COUNTY OF LOS ANGELES	\$0.00	11
16	ADMINISTRATIVE & HUMAN RESOURCES	C13424	01	DEFERRED COMPENSATION PLAN SERVICES	BENEFIT FUNDING SERVICES GROUP	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13425	58	TRAFFIC SIGNAL SYNCHRONIZATION PROJECT	CITY OF COACHELLA	\$0.00	6
16	ADMINISTRATIVE & HUMAN RESOURCES	C13427	01	INSURANCE CONSULTANT/BROKER SERVICE	MERCER	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13431	27	DEMONSTRATE STAGED COMBUSTION HYDROGEN ASSISTED EMISSION CONTROL SYSTEM	GAS TECHNOLOGY INSTITUTE	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13434	80	REPOWER 5 OFF-ROAD VEHICLES	ABOVE ALL GRADING	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13442	58	MOBILE HOME PARK PAVING PROJECTS	COUNTY OF RIVERSIDE	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13444	58	PARKING LOT PAVING DUST MITIGATION PROJECT	TORRES MARTINEZ DESERT CAHUILLA INDIANS	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13446	80	REPOWER OF 4 OFF-ROAD VEHICLES	MUTH EQUIPMENT, INC.	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13446	80	REPOWER OF 4 OFF-ROAD VEHICLES	MUTH EQUIPMENT, INC.	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13448	58	DUST MITIGATION PROJECTS	CITY OF DESERT HOT SPRINGS	\$0.00	11
08	LEGAL	C13458	01	PROVIDE LIABILITY COUNSEL SERVICES	LYNBERG & WATKINS, APC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13463	58	AIR FILTRATION FOR SCHOOLS IN EJ AREA	COACHELLA VALLEY UNIFIED SCHOOL DISTRICT	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14025	80	REPOWER 2 DIESEL OFF-ROAD CONSTRUCTION VEHICLES	LEE & STIRES INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14031	58	INSTALLATION OF SOLAR PHOTOVOLTAIC GROUND MOUNT SYSTEM	PALM SPRINGS UNIFIED SCHOOL DISTRICT	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14033	58	UPGRADE PUBLIC ACCESS STATION TO L/CNG	BORDER VALLEY TRADING	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14040	58	INSTALLATION OF SOLAR PHOTOVOLTAIC GROUND MOUNT SYSTEM	RENOVA ENERGY CORP.	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14053	01	PHEV FLEET PARTICIPANT AGREEMENT	EPRI	\$0.00	11

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26	PLANNING RULE DEV & AREA SOURCES	C14065	01	REVIEW OF SCAQMD SOCIOECONOMIC ASSESSMENT	ABT ASSOCIATES, INC	\$0.00	6
08	LEGAL	C14066	01	CONSULTING SERVICES FOR PLANNING, FIELD TESTING, CONCEPTUAL FLOW MODEL, AND CONCEPTUAL DESIGN OF LANDFILL GAS ODOR CONTROL SYSTEM	RAMIN YAZDANI	\$0.00	6
08	LEGAL	C14066	01	CONSULTING SERVICES FOR PLANNING, FIELD TESTING, CONCEPTUAL FLOW MODEL, AND CONCEPTUAL DESIGN OF LANDFILL GAS ODOR CONTROL SYSTEM	RAMIN YAZDANI	\$20,000.00	
08	LEGAL	C14068	01	EVALUATE GAS GENERATION CHARACTERISTICS OF THE SUNSHINE CANYON LANDFILL IN SYLMAR, CALIFORNIA	HYDRO GEO CHEM, INC.	\$0.00	6
08	LEGAL	C14068	01	EVALUATE GAS GENERATION CHARACTERISTICS OF THE SUNSHINE CANYON LANDFILL IN SYLMAR, CALIFORNIA	HYDRO GEO CHEM, INC.	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14076	32	REPOWER 4 OFF-ROAD DIESEL VEHICLES	MILLER EQUIPMENT COMPANY INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14095	31	SO CAL EV INFRASTRUCTURE MOA	CITY OF COVINA	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14109	32	REPOWER AND RETROFIT OF 3 OFF ROAD VEHICLES	NICK BELL DBA NB EQUIPMENT	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14109	32	REPOWER AND RETROFIT OF 3 OFF ROAD VEHICLES	NICK BELL DBA NB EQUIPMENT	\$0.00	6
04	FINANCE	C14150	57	CITY OF EL MONTE LAMBERT PARK PROJECT	CITY OF EL MONTE	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14172	31	AIR POLLUTION HEALTH EFFECTS - OXIDATIVE STRESS TO PARTICULATE AIR POLLUTION EXPOSURES IN ELDERLY	UNIVERSITY OF CALIFORNIA - IRVINE	\$0.00	11
08	LEGAL	C14187	01	PROVIDE LEGAL ASSISTANCE WITH RULE 444 AMENDMENT	GAINES & STACEY, LLP	\$0.00	6
08	LEGAL	C14187	01	PROVIDE LEGAL ASSISTANCE WITH RULE 444 AMENDMENT	GAINES & STACEY, LLP	\$0.00	11
08	LEGAL	C14187	01	PROVIDE LEGAL ASSISTANCE WITH RULE 444 AMENDMENT	GAINES & STACEY, LLP	\$5,000.00	
08	LEGAL	C14187	01	PROVIDE LEGAL ASSISTANCE WITH RULE 444 AMENDMENT	GAINES & STACEY, LLP	\$5,000.00	

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14199	31	SO CAL EV INFRASTRUCTURE MOA	CLEAN FUEL CONNECTION INC	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14202	31	SO CAL EV INFRASTRUCTURE MOA	ADOPT A CHARGER, INC.	\$0.00	6
08	LEGAL	C14211	01	LEGAL ADVICE RELATED TO SUBMISSION TO THE SURFACE TRANSPORTATION BOARD (STB) IN RESPONSE TO EPA'S REQUEST FOR DECLARATORY RULING	WILMER CUTLER PICKERING HALE & DORR LLP	\$0.00	6
08	LEGAL	C14211	01	LEGAL ADVICE RELATED TO SUBMISSION TO THE SURFACE TRANSPORTATION BOARD (STB) IN RESPONSE TO EPA'S REQUEST FOR DECLARATORY RULING	WILMER CUTLER PICKERING HALE & DORR LLP	\$0.00	11
35	LEGISLATIVE & PUBLIC AFFAIRS	C14237	01	ORGANIZE AND IMPLEMENT SCAQMD ENVIRONMENTAL JUSTICE CONFERENCE	MARIA ROBLES	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14238	81	PROP 1B TRUCK REPLACEMENT PROGRAM	STRENGTH TRANSPORTATION MANAGEMENT	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14258	81	PROP 1B TRUCK REPLACEMENT PROGRAM	A-G SOD FARMS, INC.	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14326	32	REPOWER 3 OFF-ROAD VEHICLES	PEED EQUIPMENT COMPANY	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14328	81	PROP 1B TRUCK REPLACEMENT PROGRAM	BIAGI BROS. INC	\$0.00	11
08	LEGAL	C14360	01	OFFICE OF GENERAL COUNSEL DOCUMENT MANAGEMENT SYSTEM	HARBOR LITIGATION SOLUTIONS	\$0.00	6
08	LEGAL	C14360	01	OFFICE OF GENERAL COUNSEL DOCUMENT MANAGEMENT SYSTEM	HARBOR LITIGATION SOLUTIONS	\$40,000.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14377	64	PROP 1B TRUCK REPLACEMENT PROGRAM	V EXPRESS, INC.	\$0.00	11
26	PLANNING RULE DEV & AREA SOURCES	C14421	01	REVIEW OF SCIENTIFIC LITERATURE FOR RESPIRATORY IRRITATIONS, NOSEBLEEDS, AND ODORS IN CHILDREN FROM AIR POLLUTANTS	UNIVERSITY OF CALIFORNIA-LOS ANGELES	\$0.00	6
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14536	81	PROVIDE TECHNICAL ASSISTANCE FOR THE PROP 1B GOODS MOVEMENT PROGRAM	CLEAN FUEL CONNECTION INC	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14568	81	TECHNICAL ASSISTANCE, IMPLEMENTATION & OUTREACH SUPPORT FOR PROP 1B GOODS MOVEMENT PROGRAM	TETRA TECH INC	\$0.00	11

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14622	01	CO-SPONSOR CSULB CEERS STUDENT EDUCATIONAL PROJECT 2014	CALIFORNIA STATE UNIVERSITY-LONG BEACH	\$0.00	6
16	ADMINISTRATIVE & HUMAN RESOURCES	C14670	01	CLASSIFICATION AND COMPENSATION SERVICES	KOFF & ASSOCIATES, INC.	\$30,000.00	
08	LEGAL	C14680	01	LEGAL CONSULTATION RELATING TO 2012 AQMP CONTROL MEASURE IND-01	DAVID NAWI	\$0.00	6
08	LEGAL	C14682	01	ELECTRONIC LEGAL SERVICES/LAW LIBRARY SERVICES	THOMSON REUTERS - WEST PYMT CTR	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15020	31	DEVELOP SAMPLING AND TESTING PROTOCOLS FOR ANALYZING IMPURITIES IN HYDROGEN	UNIVERSITY OF CALIFORNIA - IRVINE	\$0.00	6
27	INFORMATION MANAGEMENT	C15023	01	MASS EMAIL OPTIMIZATION	GENESIS 1 CONSULTING GROUP	\$0.00	6
20	MEDIA OFFICE	C15027	01	YOUTH SPORTS AND HEALTHY CHOICES VIDEO PRODUCTION	GROUP 1 PRODUCTIONS	\$5,500.00	
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15111	81	PROP 1B TRUCK REPLACEMENT PROGRAM	TRIUMPH SALES, INC.	\$0.00	6
50	ENGINEERING AND COMPLIANCE	C15279	01	EXIDE MITIGATION PLAN FOR CONSTRUCTION OF RISK REDUCTION MEASURES	TETRA TECH BAS	\$0.00	11
26	PLANNING RULE DEV & AREA SOURCES	C15342	01	EVALUATION OF NOx EMISSION CONTROL TECHNOLOGIES FOR STATIONARY SOURCES LOCATED AT REFINERIES IN THE SCAQMD'S RECLAIM PROGRAM	NORTON ENGINEERING CONSULTANTS, INC	\$0.00	6
26	PLANNING RULE DEV & AREA SOURCES	C15343	01	EVALUATION OF NOx EMISSION CONTROL TECHNOLOGIES FOR STATIONARY SOURCES LOCATED AT NON-REFINERIES IN THE SCAQMD'S RECLAIM PROGRAM	ETS INC	\$0.00	6
20	MEDIA OFFICE	C15345	36	MEDIA, ADVERTISING AND OUTREACH CAMPAIGN FOR "CHECK BEFORE YOU BURN" PROGRAM	QUIJOTE CORP DBA SENSIS	\$0.00	6
20	MEDIA OFFICE	C15457	01	MEDIA, ADVERTISING, AND PUBLIC OUTREACH CAMPAIGN FOR CHECK BEFORE YOU BURN PROGRAM	ALPUNTO ADVERTISING, INC.	\$6,553.87	
04	FINANCE	C15508	01,22	AUDIT OF AB2766 FEE REVENUE RECIPIENTS FOR FY 2011-12 & 2012-13	SIMPSON & SIMPSON, CPAs	\$0.00	6

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15590	01	CONDUCT SURFACE METEOROLOGICAL NETWORK PERFORMANCE AND SYSTEM EVALUATION PROGRAM	SONOMA TECHNOLOGY INC	\$0.00	6
44	MSRC	ML11020	23	RETROFIT 1 ON-ROAD DIESEL VEHICLE AND REPOWER 1 OFF-ROAD HEAVY-DUTY VEHICLE	CITY OF INDIO	\$0.00	6
44	MSRC	ML11021	23	PURCHASE 7 HEAVY-DUTY CNG VEHICLES	CITY OF WHITTIER	\$0.00	6
44	MSRC	ML11027	23	MODIFY VEHICLE MAINTENANCE FACILITY	CITY OF LOS ANGELES	\$0.00	6
44	MSRC	ML11036	23	PURCHASE 9 HEAVY-DUTY NATURAL GAS VEHICLES AND INSTALL CNG STATION	CITY OF RIVERSIDE	\$0.00	6
44	MSRC	ML11041	23	PURCHASE 7 LPG HEAVY-DUTY VEHICLES, RETROFIT 6 HEAVY-DUTY DIESEL VEHICLES	CITY OF SANTA ANA	\$0.00	6
44	MSRC	ML11045	23	PURCHASE 1 HEAVY-DUTY CNG VEHICLE	CITY OF NEWPORT BEACH	\$0.00	6
44	MSRC	ML12013	23	ELECTRIC VEHICLE CHARGING INFRASTRUCTURE	CITY OF PASADENA	\$0.00	6
44	MSRC	ML12017	23	PURCHASE 32 HEAVY-DUTY NATURAL GAS VEHICLES	CITY OF LOS ANGELES	\$0.00	6
44	MSRC	ML12020	23	PURCHASE 15 HEAVY-DUTY CNG VEHICLES	CITY OF LOS ANGELES	\$0.00	6
44	MSRC	ML14011	23	IMPLEMENT PALM SPRINGS BICYCLE PROJECTS	CITY OF PALM SPRINGS	\$0.00	11
44	MSRC	ML14014	23	INSTALL EV CHARGING STATIONS	CITY OF TORRANCE	\$0.00	11
44	MSRC	ML14064	23	PURCHASE 2 HEAVY-DUTY VEHICLES	CITY OF CLAREMONT	\$0.00	6
44	MSRC	MS07022	23	INSTALL HYDROGEN STATION-CAL STATE LA	CALIFORNIA STATE UNIVERSITY- LOS ANGELES	\$0.00	6
44	MSRC	MS07080	23	DEMONSTRATE RETROFIT DEVICES ON THREE OFF-ROAD VEHICLES (SHOWCASE PROGRAM)	CITY OF LOS ANGELES-DEPT OF PUBLIC WORKS	\$0.00	6
44	MSRC	MS08067	23	CONSTRUCT CNG FUELING STATION - ANAHEIM	TRILLIUM USA COMPANY	\$0.00	6
44	MSRC	MS11010	23	CONSTRUCT LNG FUELING STATION	BORDER VALLEY TRADING	\$0.00	6
44	MSRC	MS11023	23	PURCHASE 2 HEAVY-DUTY CNG VEHICLES AND EXPAND EXISTING CNG FUELING STATION	CITY OF RANCHO CUCAMONGA	\$0.00	6
44	MSRC	MS11071	23	INSTALL CNG FUELING STATION	CITY OF TORRANCE	\$0.00	6
44	MSRC	MS11091	23	DEMONSTRATE RETROFIT DEVICES ON OFF- ROAD VEHICLES	CALIFORNIA CARTAGE CO, LLC	\$0.00	6

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DEPT ID	DEPT NAME	CONTRACT NUMBER	FUND CODE	DESCRIPTION	VENDOR NAME	CONTRACT AMOUNT	FOOT NOTE
44	MSRC	MS11092	23	DEMONSTRATE RETROFIT DEVICES ON OFF-ROAD VEHICLES	GRIFFITH COMPANY	\$0.00	6
44	MSRC	MS12033	23	PURCHASE 20 MEDIUM-DUTY CNG VEHICLES	PHACE MANAGEMENT SERVICES LLC	\$0.00	11
44	MSRC	MS12034	23	PURCHASE 2 MEDIUM AND 7 MEDIUM-HEAVY DUTY ON-ROAD VEHICLES	WARE DISPOSAL, INC.	\$0.00	6
44	MSRC	MS12080	23	EXPAND CNG STATION	CITY OF PASADENA	\$0.00	6
44	MSRC	MS14046	23	EXPAND PUBLIC ACCESS CNG STATION IN ONTARIO	ONTARIO CNG STATION INC.	\$0.00	6
44	MSRC	MS14048	23	BUY DOWN THE COST OF ALTERNATIVE FUELED SCHOOL BUSES	BUSWEST, LLC	\$0.00	6
44	MSRC	MS14059	23	SIGNAL SYNCHRONIZATION PARTNERSHIP PROGRAM	RIVERSIDE COUNTY TRANSPORTATION COMM	\$0.00	11
44	SCIENCE & TECHNOLOGY ADVANCEMENT	XC05128	01	PROVIDE TECHNICAL ASSISTANCE FOR DEVELOPMENT OUTREACH & COMMERCIALIZATION OF ADVANCED HEAVY-DUTY & OFF-ROAD TECHNOLOGIES	MID-ATLANTIC RESEARCH INSTITUTE LLC	\$30,000.00	
08	LEGAL	XC12250	01	PROVIDE RAILROAD LITIGATION SERVICES	LIGHTFOOT STEINGARD & SADOWSKY, LLP	\$0.00	6
<b>Subtotal</b>						<b>\$456,218.86</b>	

**Board Assistant  
Board Approved**

02	GOVERNING BOARD	C15000	01	BOARD ASSISTANT SERVICES FOR DENNIS YATES	ROBERT ULLOA	\$565.56	
02	GOVERNING BOARD	C15001	01	BOARD ASSISTANT SERVICES FOR DENNIS YATES	EARL C ELROD	\$565.56	
02	GOVERNING BOARD	C15002	01	BOARD ASSISTANT SERVICES FOR FOR MIGUEL PULIDO	LUIS A PULIDO	\$377.00	
02	GOVERNING BOARD	C15003	01	BOARD ASSISTANT SERVICES FOR DR. CLARK PARKER	MARIA INIGUEZ	\$377.00	
02	GOVERNING BOARD	C15004	01	BOARD ASSISTANT SERVICES FOR SHAWN NELSON	INFRASTRUCTURE GROUP, INC	\$377.00	
02	GOVERNING BOARD	C15005	01	BOARD ASSISTANT SERVICES FOR JUDITH MITCHELL	MARISA KRISTINE PEREZ	\$565.50	

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02	GOVERNING BOARD	C15006	01	BOARD ASSISTANT SERVICES FOR JUDITH MITCHELL	CHUNG S. LIU	\$188.50	
02	GOVERNING BOARD	C15007	01	BOARD ASSISTANT SERVICES FOR DR. JOSEPH LYOU	NICOLE NISHIMURA	\$77.00	
02	GOVERNING BOARD	C15008	01	BOARD ASSISTANT SERVICES FOR DR. JOSEPH LYOU	MARK ABRAMOWITZ	\$300.00	
02	GOVERNING BOARD	C15009	01	BOARD ASSISTANT SERVICES FOR JOSIE GONZALES	COUNTY OF SAN BERNARDINO	\$377.00	
02	GOVERNING BOARD	C15010	01	BOARD ASSISTANT SERVICES FOR MICHAEL CACCIOTTI	SHO TAY	\$39.48	
02	GOVERNING BOARD	C15011	01	BOARD ASSISTANT SERVICES FOR MICHAEL CACCIOTTI	RONALD KETCHAM	\$110.00	
02	GOVERNING BOARD	C15012	01	BOARD ASSISTANT SERVICES FOR MICHAEL CACCIOTTI	WILLIAM GLAZIER	\$66.57	
02	GOVERNING BOARD	C15013	01	BOARD ASSISTANT SERVICES FOR MICHAEL CACCIOTTI	JAMES GLEN DUNCAN	\$84.00	
02	GOVERNING BOARD	C15014	01	BOARD ASSISTANT SERVICES FOR MICHAEL CACCIOTTI	FRANK CARDENAS AND ASSOCIATES	\$77.00	
02	GOVERNING BOARD	C15015	01	BOARD ASSISTANT SERVICES FOR JOE BUSCAINO	JACOB LEE HAIK	\$377.00	
02	GOVERNING BOARD	C15016	01	BOARD ASSISTANT SERVICES FOR JOHN BENOIT	BUFORD A CRITES	\$377.00	
02	GOVERNING BOARD	C15017	01	BOARD ASSISTANT SERVICES FOR BEN BENOIT	WESTERN RIVERSIDE COUNCIL OF GOVERNMENTS	\$377.00	
02	GOVERNING BOARD	C15018	01	BOARD ASSISTANT SERVICES FOR MICHAEL ANTONOVICH	DEBRA S MENDELSON	\$377.00	
02	GOVERNING BOARD	C15019	01	BOARD ASSISTANT SERVICES FOR WILLIAM BURKE	P & L CONSULTING, LLC	\$1,131.00	
<b>Subtotal</b>						<b>\$6,786.17</b>	

**V. TERMINATED CONTRACTS-PARTIAL/NO WORK PERFORMED**

44	SCIENCE & TECHNOLOGY ADVANCEMENT	C10610	80	REPOWER 10 AUXILIARY ENGINES OF 6 MARINE VESSELS	SAUSE BROS. OCEAN TOWING CO., INC.	-\$55,409.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11087	81	PROP 1B NON-PORT TRUCK RETROFIT PROGRAM	ASBURY ENVIRONMENTAL SERVICES	-\$40,000.00	7



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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11173	32	REPOWER 3 DIESEL CRAWLER TRACTORS, 1 RUBBER-TIERED LOADER, 1 DIESEL EXCAVATOR, & 1 DIESEL SCRAPER	CHINO GRADING, INC	-\$305,817.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11340	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ANTHONY H. OSTERKAMP JR.	-\$50,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C11556	32	REPOWER 21 OFF-ROAD VEHICLES	RENTRAC INC	-\$2,755,039.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12196	32	REPOWER 19 OFF-ROAD VEHICLES	RRM PROPERTIES, LTD	-\$1,345,532.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12327	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DALTON TRUCKING INC	-\$250,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12330	81	PROP 1B TRUCK REPLACEMENT PROGRAM	VILLA PARK TRUCKING, INC.	-\$360,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12331	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RANDALL FOODS INC.	-\$300,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12342	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RPM TRANSPORATION, INC.	-\$80,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12348	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LEE JENNINGS TARGET EXPRESS, INC.	-\$460,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12352	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SEASON PRODUCE COMPANY	-\$30,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12366	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MATHESON TRUCKING, INC.	-\$120,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12372	81	PROP 1B TRUCK REPLACEMENT PROGRAM	BEST DEMOLITION & RECYCLING CO. INC.	-\$60,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12373	81	PROP 1B TRUCK REPLACEMENT PROGRAM	J.G. RODRIGUEZ TRUCKING	-\$240,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12411	81	PROP 1B TRUCK REPLACEMENT PROGRAM	G.O. RODRIGUEZ TRUCKING, INC.	-\$360,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12446	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MARTIAN TRUCKING, INC.	-\$110,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12447	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FOSTER POULTRY FARMS	-\$200,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12469	81	PROP 1B TRUCK REPLACEMENT PROGRAM	HANNIBAL INDUSTRIES INC.	-\$40,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12492	81	PROP 1B TRUCK REPLACEMENT PROGRAM	TOTTEN TUBES, INC.	-\$35,000.00	7

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12592	81	PROP 1B TRUCK REPLACEMENT PROGRAM	MARTIN PEREZ	-\$200,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12593	81	PROP 1B TRUCK REPLACEMENT PROGRAM	NEAL TRUCKING, INC.	-\$57,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12637	81	PROP 1B TRUCK RETROFIT PROGRAM	RRM PROPERTIES, LTD	-\$20,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12645	81	PROP 1B TRUCK REPLACEMENT PROGRAM	REDLANDS FRUIT COMPANY	-\$100,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12658	81	PROP 1B TRUCK RETROFIT PROGRAM	DART EQUIPMENT CORPORATION	-\$10,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12662	81	PROP 1B TRUCK RETROFIT PROGRAM	SLR ENTERPRISES, INC.	-\$10,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12663	81	PROP 1B TRUCK REPLACEMENT PROGRAM	INLINE DISTRIBUTING CO	-\$10,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12665	81	PROP 1B TRUCK RETROFIT PROGRAM	CERENZIA FOODS INC.	-\$10,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12682	81	PROP 1B TRUCK RETROFIT PROGRAM	CHALLENGE DAIRY PRODUCTS, INC	-\$5,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12815	81	PROP 1B TRUCK REPLACEMENT PROGRAM	TRANSLOADING EXPRESS	-\$40,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C12868	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DOUGLAS STEEL SUPPLY, INC.	-\$60,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13122	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DALTON TRUCKING INC	-\$100,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13124	81	PROP 1B TRUCK REPLACEMENT PROGRAM	F&F TRANSPORT SERVICE INC.	-\$40,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13134	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SOUTH BOUND EXPRESS, INC.	-\$60,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13141	81	PROP 1B TRUCK REPLACEMENT PROGRAM	REDLANDS FRUIT COMPANY	-\$40,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13143	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RRM PROPERTIES, LTD	-\$180,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13176	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PACIFIC TANK LINES, INC.	-\$60,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13193	32	REPOWER 5 OFF-ROAD VEHICLES	PARK WEST LANDSCAPE, INC.	-\$28,715.83	7

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13199	32	REPOWER 2 OFF-ROAD HEAVY-DUTY VEHICLES	MOUNTAIN TOP QUARRIES, LLC	-\$134,416.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13244	32	REPOWER 6 OFF-ROAD VEHICLES	WHITTIER FERTILIZER CO.	-\$81,175.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13283	32	REPOWER 3 DIESEL OFF-ROAD CONSTRUCTION VEHICLES	SAGE GREEN, LLC	-\$517,738.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13289	32	REPOWER 3 MAIN AND 3 AUXILIARY ENGINES ON 3 MARINE VESSELS	SAN PEDRO BAIT CO. INC	-\$274,955.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13450	58	PROCUREMENT OF FIVE NEW CARB-CERTIFIED DEDICATED CNG-POWERED VEHICLES	ANGEL VIEW, INC	-\$31,280.73	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C13460	32	REPOWER 13 DIESEL OFF-ROAD VEHICLES	JAGUR TRACTOR	-\$623,497.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14036	58	PROCURE 1 CNG MEDIUM-DUTY VEHICLE	ST. ELIZABETH OF HUNGARY CATHOLIC CHURCH	-\$5,500.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14076	32	REPOWER 4 OFF-ROAD DIESEL VEHICLES	MILLER EQUIPMENT COMPANY INC	-\$87,387.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14099	32	REPOWER OF TWO MAIN AND ONE AUXILIARY ENGINES ON ONE MARINE VESSEL	CATALINA SEA RANCH, LLC	-\$862.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14149	32	REPOWER 2 OFF-ROAD VEHICLES	PEED EQUIPMENT COMPANY	-\$150,924.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14158	80	REPOWER 2 OFF-ROAD DIESEL VEHICLES	POWER MOVE, INC.	-\$107,530.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14176	32	REPLACE 2 OFF-ROAD VEHICLES	KASSEL CONTRACTING, INC.	-\$14,204.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14227	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SSI EXPRESS, INC.	-\$20,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14238	81	PROP 1B TRUCK REPLACEMENT PROGRAM	STRENGTH TRANSPORATION MANAGEMENT	-\$155,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14246	81	PROP 1B TRUCK REPLACEMENT PROGRAM	E.E.S.LLC	-\$25,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14257	81	PROP 1B TRUCK REPLACEMENT PROGRAM	A&A READY MIXED CONCRETE, INC.	-\$3,250,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14258	81	PROP 1B TRUCK REPLACEMENT PROGRAM	A-G SOD FARMS, INC.	-\$150,000.00	7

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14265	81	PROP 1B TRUCK REPLACEMENT PROGRAM	OAKLEY TRANSPORTATION, INC.	-\$5,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14272		PROP 1B TRUCK REPLACEMENT PROGRAM	G.O. RODRIGUEZ TRUCKING, INC.	-\$50,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14288	81	PROP 1B TRUCK REPLACEMENT PROGRAM	HARRISON - NICHOLS CO. LTD.	-\$50,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14293	81	PROP 1B TRUCK REPLACEMENT PROGRAM	PTI SAND & GRAVEL INC.	-\$250,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14302	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SUPERIOR READY MIX CONCRETE, L.P.	-\$1,685,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14306	81	PROP 1B TRUCK REPLACEMENT PROGRAM	APEX BULK COMMODITIES, LLC.	-\$330,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14312	81	PROP 1B TRUCK REPLACEMENT PROGRAM	SAN LUIS BUTANE DISTRIBUTORS, INC.	-\$15,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14333	81	PROP 1B TRUCK REPLACEMENT PROGRAM	WESTSIDE BUILDING MATERIAL CORP	-\$125,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14344	81	PROP 1B TRUCK REPLACEMENT PROGRAM	RRM PROPERTIES, LTD	-\$150,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14346	81	PROP 1B TRUCK REPLACEMENT PROGRAM	AJR TRUCKING, INC.	-\$150,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14362	81	PROP 1B TRUCK REPLACEMENT PROGRAM	GARDNER TRUCKING, INC.	-\$2,450,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14363	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JORLEASE, INC	-\$45,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14367	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ALICIA VELAZQUEZ	-\$10,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14470	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE AGUIRRE ORNELAS	-\$5,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14494	81	PROP 1B TRUCK REPLACEMENT PROGRAM	CUPERTINO BRAVO	-\$10,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14533	81	PROP 1B TRUCK REPLACEMENT PROGRAM	GILBERT CANTELLANO	-\$10,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14534	81	PROP 1B TRUCK REPLACEMENT PROGRAM	GIOVANNI B. CARBALLO	-\$4,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14592	81	PROP 1B TRUCK REPLACEMENT PROGRAM	WILLIAM RAMOS	-\$10,000.00	7

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44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14605	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JOSE PABLO ULLOA	-\$10,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C14679	81	PROP 1B TRUCK REPLACEMENT PROGRAM	DOLLAR TRUCKING	-\$10,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15111	81	PROP 1B TRUCK REPLACEMENT PROGRAM	TRIUMPH SALES, INC.	-\$50,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15205	81	PROP 1B TRUCK REPLACEMENT PROGRAM	REGO'S LOWBED EQUIPMENT TRANSPORTATION	-\$10,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15339	81	PROP 1B TRUCK REPLACEMENT PROGRAM	IVAN YURTAEV	-\$30,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15352	81	PROP 1B TRUCK REPLACEMENT PROGRAM	FAUSTINO ANDRADE	-\$40,000.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15531	80	REPOWER 4 OFF-ROAD VEHICLES	PEED EQUIPMENT COMPANY	-\$70,410.00	7
44	SCIENCE & TECHNOLOGY ADVANCEMENT	C15534	80	REPLACEMENT OF 2 AND REPOWER OF 3 OFF-ROAD VEHICLES	SAGE GREEN, LLC	-\$21,067.00	7
44	MSRC	ML06035	23	PURCHASE 7 CNG REFUSE TRUCKS	CITY OF HEMET	-\$75,893.00	7
44	MSRC	ML06054	23	PURCHASE 3 CNG VEHICLES AND 3 LPG HEAVY DUTY VEHICLES	COUNTY OF LOS ANGELES	-\$25,000.00	7
44	MSRC	ML08040	23	PURCHASE 16 CNG VEHICLES, EXPAND CNG STATION AND MODIFY MAINTENANCE FACILITY	CITY OF RIVERSIDE	-\$50,000.00	7
44	MSRC	ML09009	23	UPGRADE CNG STATION	CITY OF SOUTH PASADENA	-\$11,570.00	7
44	MSRC	ML11042	23	PURCHASE 1 CNG SWEEPER AND REPOWER 1 HEAVY-DUTY DIESEL VEHICLE	CITY OF CHINO	-\$5,077.00	7
44	MSRC	MS07070	23	DEMONSTRATE RETROFIT DEVICES ON EIGHT OFFROAD VEHICLES (SHOWCASE PROGRAM)	GRIFFITH COMPANY	-\$42,930.00	7
44	MSRC	MS10003	23	PURCHASE 1 VACUUM TRUCK EQUIPPED WITH AN ADVANCED NATURAL GAS ENGINE	CITY OF SIERRA MADRE	-\$13,555.00	7
44	MSRC	MS10005	23	PURCHASE 5 GASOLINE-ELECTRIC HYBRID TRUCKS	DOMESTIC LINEN SUPPLY COMPANY, INC.	-\$47,444.00	7
44	MSRC	MS11055	23	REPOWER 5 HEAVY-DUTY OFF-ROAD VEHICLES	KEC ENGINEERING	-\$50,000.00	7
44	MSRC	MS11062	23	DEMONSTRATE RETROFIT DEVICES ON OFF-ROAD VEHICLES	LOAD CENTER	-\$18,935.00	7

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**Contract Activity Report**  
**July 1, 2014 - June 30, 2015**

DEPT ID	DEPT NAME	CONTRACT NUMBER	FUND CODE	DESCRIPTION	VENDOR NAME	CONTRACT AMOUNT	FOOT NOTE
44	MSRC	MS11082	23	DEMONSTRATE RETROFIT DEVICES ON OFF-ROAD VEHICLES	BAUMOT NORTH AMERICA, LLC	-\$61,608.00	7
<b>Subtotal</b>						<b>-\$19,854,470.56</b>	

**SPECIAL FUNDS**

- 17 ADV. TECH, OUTREACH & EDU FUND
- 20 AIR QUALITY ASSISTANCE FUND
- 23 MSRC FUND
- 27 AIR QUALITY INVESTMENT FUND
- 31 CLEAN FUELS FUND
- 32 CARL MOYER FUND - SB1107 ACCOUNT
- 33 SCHOOL BUS REPLACEMENT PROGRAM
- 34 ZERO EMISSION VEHICLE INCENTIVE PROGRAM
- 35 AES SETTLEMENT PROJECTS FUND
- 36 RULE 1309.1 PRIORITY RESERVE FUND
- 37 CARB ERC BANK FUND
- 38 LADWP SETTLEMENT PROJECTS FUND
- 39 STATE EMISSIONS MITIGATION FUND
- 40 NATURAL GAS VEHICLE PARTNERSHIP FUND
- 41 STATE BUG FUND
- 45 CBE/CBO SETTLEMENT AGREEMENT FUND
- 46 BP ARCO SETTLEMENT FUND
- 48 HEALTH EFFECTS RESEARCH FUND
- 50 DOE ARRA-PLUG-IN HYBRID ELECTRIC VEHICLES
- 51 DOE ARRA-LNG CORRIDOR EXPANSION
- 52 TRAPAC SCHOOL AIR FILTRATION
- 53 EMISSION REDUCTION AND OUTREACH FUND
- 56 HEROS II PROGRAM FUND
- 58 AB1318 MITIGATION FEES FUND
- 59 CARL MOYER VOUCHER INCENTIVE FUND
- 60 DOE PEV INFRASTRUCTURE PLANNING SPECIAL REVENUE FUND
- 61 ADVANCED TECHNOLOGY GOODS MOVEMENT FUND
- 71 CNG FUELING STATION ENTERPRISE FUND

**FOOTNOTES**

- 1 NO FIXED VALUE
- 2 RATES VARY - NO FIXED VALUE
- 3 REVENUE CONTRACT - NO AMOUNT SHOWN
- 4 NO COST - COST REALLOCATION
- 5 CHANGED TO EMPLOYEE STATUS
- 6 NO COST- TIME EXTENSION
- 7 DE-OBLIGATION OF FUNDING
- 8 COMPETITIVE SOLICITATION ISSUED BY ANOTHER GOVERNMENT AGENCY
- 9 NO COST - AIR MONITORING/LICENSE AGR
- 10 CNG VEHICLE PARTNERSHIP SELECTION
- 11 NO COST - CHANGE IN TERMS
- 12 FEDERAL GOVERNMENT PASS-THRU
- 13 AT DIRECTION OF LEGISLATIVE COMMITTEE
- 14 OPTIONAL YEAR RENEWAL/MULTI-YR CONTRACT
- 15 TRUCK GRANT PAID TO CASCADE THROUGH LEASE-TO-OWN IS FOR OPERATION AND REPORTING ONLY.
- 16 AMOUNT UTILIZED MAY BE LESS THAN CONTRACT AMOUNT.

**South Coast Air Quality Management District**  
**Contract Activity Report**  
**July 1, 2014 - June 30, 2015**

<b>DEPT ID</b>	<b>DEPT NAME</b>	<b>CONTRACT NUMBER</b>	<b>FUND CODE</b>	<b>DESCRIPTION</b>	<b>VENDOR NAME</b>	<b>CONTRACT AMOUNT</b>	<b>FOOT NOTE</b>
80	CARL MOYER FUND - AB923 ACCOUNT						
81	PROPOSITION 1B - GOODS MOVEMENT FUND						
82	PROPOSITION 1B - LOWER EMISSION SCHOOL BUS						

[↑ Back to Agenda](#)

BOARD MEETING DATE: September 4, 2015

AGENDA NO. 22

REPORT: Summary of Changes to FY 2014-15 Approved Budget

SYNOPSIS This is the annual report of budget changes for FY 2014-15.

COMMITTEE: No Committee Review

RECOMMENDED ACTION:  
Receive and file.

Barry R. Wallerstein, D.Env.  
Executive Officer

MBO:DRP:JCK:lg

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## **Background**

Revisions are made to the budget either through Board-approved changes or through organizational unit-requested budget changes which reallocate already-budgeted funds within a Major Object to meet operational needs, but do not increase the budget. Staff has prepared this report on budget revisions made during FY 2014-15. Organizational unit-requested budget changes have included such items as a transfer of budgeted funds from Planning, Rules and Area Sources to Information Management for enhancements to the Web-based Architectural Coatings Reporting System; from District General to Legislative and Public Affairs for a Technical Advisor for the Exide Technologies Advisory Group; from Engineering and Compliance to Information Management for enhancements and updates to PAATS/Title V and RECLAIM systems software; from District General to Information Management for PeopleSoft software enhancement projects; from District General to Media Office to fund the development of a public outreach video; from District General to Legal for reimbursable contract work; and from Planning, Rules and Area Sources to Information Management for transportation database maintenance on the Rule 2202 computer system. Expenditures relating to budget increases and/or transfers follow Board-established policy regarding purchasing and contracting.

The attached list reflects actions taken by the Board during the FY 2014-15 which have increased the operating budget.



**BOARD-APPROVED FY 2014-15 BUDGET CHANGES**

<u>Date of Board Action</u>	<u>Budget Changes</u>	<u>Description</u>
December 2013	\$ 5,155	From the Air Quality Investment Fund – to assist in implementing SCAQMD’s “Mow Down Air Pollution 2014” program.
May 2014	\$ 1,087,450	From the BP Arco Settlements Projects Fund – to update air toxics monitoring laboratory and field equipment and data management software.
July 2014	\$ 850,000	From the Clean Fuels Program Fund – for technical assistance, expert consultation, public outreach and technical conference sponsorship, and advanced technology vehicle leases.
July 2014	\$ 100,000	From the Carl Moyer Program AB 923 Fund – to support administrative, outreach, education and other directly related AB 923 activities.
July 2014	\$ 300,000	From the Prop 1B Goods Movement Fund – to support administrative and technical assistance and other directly related Prop 1B/Goods Movement activities.
July 2014	\$ 852,000	From the BP Arco Settlements Projects Fund – to establish an Air Quality Sensor Performance Evaluation Center (AQ-SPEC).
July 2014	\$ 1,681,653	From the U.S. EPA – for Enhanced Particulate Monitoring Program (\$632,427); for the PM 2.5 Monitoring program (\$181,315); for the PAMS Program (\$224,684); for the Near Road NO <sub>2</sub> Monitoring program (\$379,307); and for the NATTS program (\$263,920).
July 2014	\$ 56,000	From the Mobile Sources Air Pollution Reduction Fund – to facilitate reimbursement of administrative costs.
September 2014	\$ 250,000	From the Rule 1118 Mitigation Fund – to purchase a portable wind LIDAR system for continuous wind profile measurements

**BOARD-APPROVED FY 2014-15 BUDGET CHANGES (Cont.)**

<u>Date of Board Action</u>	<u>Budget Changes</u>	<u>Description</u>
October 2014	\$ 500,000	From the Designation for Litigation and Enforcement – for assistance in environmental lawsuits by outside law firms and in other matters requiring specialized legal counsel.
November 2014	\$ 1,062,488	From Exide Technologies – to provide independent environmental monitoring and project oversight services for mitigation activities to be implemented by Exide Technologies related to construction, sampling, repair, maintenance and other activities at the Exide.
December 2014	\$ 825,091	From the U.S. EPA – for the Section 105, Year 23, PAMS program.
January 2015	\$ 2,948	From the Air Quality Investment Fund – to assist in implementing SCAQMD’s “Mow Down Air Pollution 2015” program.
March 2015	\$ 500,000	From the Designation for Litigation and Enforcement – for assistance in environmental lawsuits by outside law firms and in other matters requiring specialized legal counsel.
May 2015	\$ 301,160	From the U.S. EPA – for the Section 103, PM2.5 program.
May 2015	<u>\$ 640,000</u>	From one-time revenue – for the replacement of SCAQMD fleet vehicles and for the replacement of a CNG van for use in air monitoring efforts.
	<u>\$ 9,013,945</u>	Total Board-approved FY 2014-15 Budget changes

**Sources of Funding:**

\$ 2,197,553 *Interfund Transfers*  
\$ 5,176,392 *Grants/Contracts*  
\$ 640,000 *Amended Revenue*  
\$ 1,000,000 *Budget Designations*  
\$ 0 *Undesignated Fund Balance*

\$132,220,074      FY 2014-15 Adopted Budget  
\$141,234,019      FY 2014-15 Ending Budget

**BOARD-APPROVED FY 2014-15 GENERAL FUND BALANCE CHANGES**

<u>Date of Board Action</u>	<u>Fund Balance Changes</u>	<u>Description</u>
December 2014	\$ (2,791,882)	From the Undesignated Fund Balance to the Health Effects Research Fund – to fund research through the Brain & Lung Tumor and Air Pollution Foundation.
May 2015	<u>\$ (1,127,500)</u>	From the Undesignated Fund Balance to the Infrastructure Improvement Fund – for building infrastructure improvement projects.
	<u>\$ (3,919,382)</u>	Total Board-approved FY 2014-15 General Fund Balance changes

BOARD MEETING DATE: September 4, 2015

AGENDA NO. 23

REPORT: Lead Agency Projects and Environmental Documents Received By SCAQMD

SYNOPSIS: This report provides, for the Board's consideration, a listing of CEQA documents received by the SCAQMD between June 1, 2015 and July 31, 2015, and those projects for which the SCAQMD is acting as lead agency pursuant to CEQA.

COMMITTEE: The Mobile Source Committee, on July 24, 2015, reviewed the June 1-June 30, 2015 portion of the report; while the July 1-July 31, 2015 portion has had no committee review.

RECOMMENDED ACTION:  
Receive and file.

Barry R. Wallerstein, D.Env.  
Executive Officer

PF:JW:IM:MK:JW:AK

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**CEQA Document Receipt and Review Logs (Attachments A-1, A-2, B-1 and B2) –** Each month, the SCAQMD receives numerous CEQA documents from other public agencies on projects that could adversely affect air quality. Because no Board meeting was held in August, the listing of CEQA documents that would have otherwise been reported for the period of, June 1, 2015, through June 30, 2015 is also included in this agenda item as Attachment A-1. A listing of all documents received during the reporting period of July 1, 2015 through July 31, 2015 is contained in Attachment A-2. Attachment B-1 lists active projects from previous reporting periods. A list of active projects from previous reporting periods for which SCAQMD staff is continuing to evaluate or prepare comments is included as Attachment B-2. Finally, a list of projects for which SCAQMD is the lead agency under CEQA is included as Attachment C-1 and C-2.

The Intergovernmental Review function, which consists of reviewing and commenting on the adequacy of the air quality analysis in CEQA documents prepared by other lead agencies, is consistent with the Board's 1997 Environmental Justice Guiding Principles and Environmental Justice Initiative #4. Furthermore, as required by the Environmental Justice Program Enhancements for FY 2002-03 approved by the Board in September

2002, each of the attachments notes those proposed projects where the SCAQMD has been contacted regarding potential air quality-related environmental justice concerns. The SCAQMD has established an internal central contact to receive information on projects with potential air quality-related environmental justice concerns. The public may contact the SCAQMD about projects of concern by the following means: in writing via fax, email, or standard letters; through telephone communication; as part of oral comments at SCAQMD meetings or other meetings where SCAQMD staff is present; or by submitting newspaper articles. The attachments also identify for each project the dates of the public comment period and the public hearing date, if applicable as reported at the time the CEQA document is received by the SCAQMD. Interested parties should rely on the lead agencies themselves for definitive information regarding public comment periods and hearings as these dates are occasionally modified by the lead agency.

At the January 6, 2006 Board meeting, the Board approved the Workplan for the Chairman's Clean Port Initiatives. One action item of the Chairman's Initiatives was to prepare a monthly report describing CEQA documents for projects related to goods movement and to make full use of the process to ensure the air quality impacts of such projects are thoroughly mitigated. In response to describing goods movement, CEQA documents (Attachments A and B) are organized to group projects of interest into the following categories: goods movement projects; schools; landfills and wastewater projects; airports; and general land use projects, etc. In response to the mitigation component, guidance information on mitigation measures were compiled into a series of tables relative to: off-road engines; on-road engines; harbor craft; ocean-going vessels; locomotives; fugitive dust; and greenhouse gases. These mitigation measure tables are on the CEQA webpages portion of the SCAQMD's website. Staff will continue compiling tables of mitigation measures for other emission sources, including airport ground support equipment, etc.

As resources permit, staff focuses on reviewing and preparing comments for projects: where the SCAQMD is a responsible agency; that may have significant adverse regional air quality impacts (e.g., special event centers, landfills, goods movement, etc.); that may have localized or toxic air quality impacts (e.g., warehouse and distribution centers); where environmental justice concerns have been raised; and those projects for which a lead or responsible agency has specifically requested SCAQMD review. If the SCAQMD staff provided written comments to the lead agency as noted in the column "Comment Status," there is a link to the "SCAQMD Letter" under the Project Description. In addition, if the SCAQMD staff testified at a hearing for the proposed project, a notation is provided under the "Comment Status." However, if there is no notation, then SCAQMD staff did not provide testimony at a hearing for the proposed project.

During the period June 1, 2015 through July 31, 2015, the SCAQMD received 239 CEQA documents. Of the total of 215 documents\* listed in Attachments A-1, A-2, B-1 and B-2:

- 59 comment letters were sent;
- 80 documents were reviewed, but no comments were made;
- 24 documents are currently under review;
- 10 documents did not require comments (e.g., public notices, plot plans, Final Environmental Impact Reports);
- 0 documents were not reviewed; and
- 47 documents were screened without additional review.

\* These statistics are from June 1, 2015 to July 31, 2015 and may not include the most recent “Comment Status” updates in Attachments A-1, A-2, B-1 and B-2.

Copies of all comment letters sent to lead agencies can be found on the SCAQMD’s CEQA webpage at the following internet address:

<http://www.aqmd.gov/home/regulations/ceqa/commenting-agency>.

**SCAQMD Lead Agency Projects (Attachment C)** – Pursuant to CEQA, the SCAQMD periodically acts as lead agency for stationary source permit projects. Under CEQA, the lead agency is responsible for determining the type of CEQA document to be prepared if the proposal is considered to be a “project” as defined by CEQA. For example, an Environmental Impact Report (EIR) is prepared when the SCAQMD, as lead agency, finds substantial evidence that the proposed project may have significant adverse effects on the environment. Similarly, a Negative Declaration (ND) or Mitigated Negative Declaration (MND) may be prepared if the SCAQMD determines that the proposed project will not generate significant adverse environmental impacts, or the impacts can be mitigated to less than significance. The ND and MND are written statements describing the reasons why proposed projects will not have a significant adverse effect on the environment and, therefore, do not require the preparation of an EIR.

Attachment C to this report summarizes the active projects for which the SCAQMD is lead agency and is currently preparing or has prepared environmental documentation. During July, one Lead Agency project was released to the public for review. As noted in Attachment C, the SCAQMD continued working on the CEQA documents for six active projects during July.

### **Attachments**

A- 1 and A-2 Incoming CEQA Documents Log

B-1 and B-2 Ongoing Active Projects for Which SCAQMD Has or Will Conduct a CEQA Review

C-1 and C-2 Active SCAQMD Lead Agency Projects

**ATTACHMENT A-1\***  
**INCOMING CEQA DOCUMENTS LOG**  
**JUNE 1, 2015 TO JUNE 30, 2015**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<b>Goods Movement</b> <b>LAC150630-17</b> Berths 167-169 [Shell] Marine Oil Terminal Wharf Improvements Project	The proposed project consists of various seismic and ground improvements to Shell Oil Company's marine oil terminal at Berths 167-169 on Mormon Island that are required in order to comply with the Marine Oil Terminal Engineering and Maintenance Standards.  Comment Period: 6/30/2015 - 7/31/2015 Public Hearing: 7/15/2015	Notice of Preparation	Port of Los Angeles	Preparing written comments
<b>Warehouse &amp; Distribution Centers</b> <b>LAC150602-12</b> 9th Street and East End Avenue Warehouse	The proposed project consists of constructing a 197,500-square-foot industrial warehouse on a 9.43 acre site.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/mnd9theast.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/mnd9theast.pdf</a> Comment Period: 5/28/2015 - 6/26/2015 Public Hearing: N/A	Draft Mitigated Negative Declaration	City of Pomona	SCAQMD staff commented 6/16/2015
<b>Warehouse &amp; Distribution Centers</b> <b>LAC150611-08</b> Development Plan Approval Case No. 892	The proposed project consists of the construction of a 63,458-square-foot warehouse on a 2.92-acre site.  Comment Period: 6/9/2015 - 6/29/2015 Public Hearing: 7/13/2015	Draft Mitigated Negative Declaration	City of Sante Fe Springs	Document reviewed - No comments sent
<b>Warehouse &amp; Distribution Centers</b> <b>RVC150612-04</b> World Logistics Center	This document consists of CARB's comment letter to the Final EIR. The proposed project consists of a new 2,610 acre Specific Plan envisioned to accommodate up to 40.6 million square feet of high cube industrial warehouse distribution development and related uses on approximately 3,818 acres. Reference SBC130206-01, RVC150430-07  Comment Period: N/A Public Hearing: N/A	Response to Comments	City of Moreno Valley	Document does not require comments  See also pp. A-2-2

\*Sorted by Land Use Type (in order of land uses most commonly associated with air quality impacts), followed by County, then date received.

# - Project has potential environmental justice concerns due to the nature and/or location of the project.

\*Disposition may change prior to Governing Board Meeting.

Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.





**ATTACHMENT A-1  
INCOMING CEQA DOCUMENTS LOG  
JUNE 1, 2015 TO JUNE 30, 2015**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Industrial and Commercial</i> <b>LAC150602-11</b> Weber Metals Large Press Expansion Project	The proposed project consists of expanding the existing facility through the installation of a new 60,000 ton forging press in a new building on the property. The new press would be housed in a new 115,000-square-foot building on the Weber Metals facility. A Southern California Edison electrical substation is proposed to be constructed on an approximately 11,500-square-foot area, in the northwest corner of the property within the City of Paramount. <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/mndweber.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/mndweber.pdf</a> Comment Period: 5/27/2015 - 6/25/2015 Public Hearing: N/A	Draft Mitigated Negative Declaration	City of Long Beach	SCAQMD staff commented 6/18/2015
<i>Industrial and Commercial</i> <b>RVC150625-11</b> Nichols Canyon Mine Expansion Project	The proposed project consists of amending an existing reclamation plan in order to increase mining activities by approximately 24 acres; reduce the annual tonnage limit for the mine from 4,000,000 tons per day to 1,000,000 tons per day; revise the approved seed mix and revegetation plan; and extend the hours permitted for mining. Comment Period: 6/25/2015 - 7/27/2015 Public Hearing: N/A	Notice of Preparation	City of Lake Elsinore	Preparing written comments
<i>Industrial and Commercial</i> <b>RVC150630-13</b> Temecula Gateway	The proposed project consists of construction of four commercial buildings totaling approximately 19,669 square feet. Comment Period: 6/30/2015 - 7/29/2015 Public Hearing: 7/22/2015	Notice of Preparation	City of Temecula	Document does not require comments
<i>Industrial and Commercial</i> <b>SBC150626-01</b> Holiday Rock's Northwest Upland Operations CUP 93-02, Modification #2	The proposed project consists of a request to modify an existing 114 acre Mine and Reclamation Plan to incorporate 64 acres of an adjacent former mine site that was recently purchased to create one plan on 178 acres to comply with state law. Comment Period: 6/4/2015 - 7/3/2015 Public Hearing: N/A	Draft Mitigated Negative Declaration	City of Upland	Preparing written comments
<i>Waste and Water-related</i> <b>LAC150602-01</b> Palos Verdes Reservoir	The proposed project consists of removing the upper portion of the outlet tower down to grade, replacing the valves and operating system, relining the reservoir with asphalt and a geomembrane liner, and replacing the geomembrane floating cover. Reference LAC150324-03 Comment Period: N/A Public Hearing: N/A	Response to Comments	Metropolitan Water District of Southern California	Document reviewed - No comments sent

# - Project has potential environmental justice concerns due to the nature and/or location of the project.

\*Disposition may change prior to Governing Board Meeting.

Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

**ATTACHMENT A-1  
INCOMING CEQA DOCUMENTS LOG  
JUNE 1, 2015 TO JUNE 30, 2015**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Waste and Water-related</i> <b>LAC150602-05</b> Universal Waste Systems, Inc., Material Recovery Facility and Transfer Station	The proposed project consists of operating a materials recovery facility and transfer station at the existing collection truck storage and repair facility. Reference LAC150519-07  Comment Period: 6/2/2015 - 6/18/2015 Public Hearing: 6/22/2015	Notice of Availability of a Recirculated Draft Mitigated Negative Declaration	City of Santa Fe Springs	Document reviewed - No comments sent
<i>Waste and Water-related</i> <b>LAC150602-13</b> Closure Plan Approval for the Exide Technologies Recycling Facility	The proposed project consists of a Closure Plan that outlines a multi-year approach for removal and decontamination of equipment, structures, and soils at the site.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/nopexideclose.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/nopexideclose.pdf</a> Comment Period: 6/2/2015 - 6/29/2015 Public Hearing: N/A	Notice of Preparation	Department of Toxic Substances Control	SCAQMD staff commented 6/25/2015
<i>Waste and Water-related</i> <b>LAC150619-04</b> Transpacific Fiber-Optic Cables Project	The proposed project consists of the installation and operation of up to four transpacific submarine cable systems which would connect the United States to various Pacific Rim locations. The terrestrial components of the Project would include marine discretionary bores, beach manholes, buried conduit systems, power feed equipment facilities, fiber optic cables, ocean ground beds, and other ancillary components.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/noptranspacific.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/noptranspacific.pdf</a> Comment Period: 6/18/2015 - 7/20/2015 Public Hearing: N/A	Notice of Preparation	City of Hermosa Beach	SCAQMD staff commented 6/25/2015
<i>Waste and Water-related</i> <b>LAC150630-21</b> Ascon Landfill Site	This document serves as a notice of the Department of Toxic Substances Control certifying the Final Environmental Impact Report and approval of Remedial Action Plan. Reference ORC150506-01  Comment Period: N/A Public Hearing: N/A	Community Notice	Department of Toxic Substances Control	Document reviewed - No comments sent
<i>Waste and Water-related</i> <b>LAC150630-22</b> Pasadena Non-Potable Water Project	The proposed project consists of construction and operation of a new non-potable water distribution system to deliver water from three local sources. Approximately 700 acre feet per year of non-potable water would be delivered to the Art Center College of Design, Brookside Golf Course, Rose Bowl Stadium and Brookside Park.  Comment Period: 6/30/2015 - 8/31/2015 Public Hearing: N/A	Notice of Availability of a Draft Environmental Impact Report	City of Pasadena	Under review, may submit written comments

# - Project has potential environmental justice concerns due to the nature and/or location of the project.

\*Disposition may change prior to Governing Board Meeting.

Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

**ATTACHMENT A-1  
INCOMING CEQA DOCUMENTS LOG  
JUNE 1, 2015 TO JUNE 30, 2015**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Waste and Water-related</i> <b>ORC150609-02</b> Beverly Hills Lots 12 and 13 - 9315 Civic Center Drive, Beverly Hills	The proposed project consists of a Removal Action Workplan for the Beverly Hills Lots 12 and 13 located at 9315 Civic Center Drive. Elevated levels of arsenic were found along the railroad line.  Comment Period: 6/9/2015 - 7/17/2015 Public Hearing: N/A	Community Notice	Department of Toxic Substances Control	Document reviewed - No comments sent
<i>Waste and Water-related</i> <b>ORC150623-09</b> Orange County Water District Mid Basin Centennial Park Injection Wells Project	The proposed project consists of the construction and operation of four underground injection wells at Centennial Park and the construction and operation of a monitoring well at Heritage Museum. The source of water to the injection wells would be treated recycled water from the Orange County Water District Groundwater Replenishment System.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/nopocwdwaterdoc.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/nopocwdwaterdoc.pdf</a> Comment Period: 6/26/2015 - 7/26/2015 Public Hearing: N/A	Notice of Preparation	Orange County Water District	SCAQMD staff commented 6/25/2015
<i>Waste and Water-related</i> <b>ORC150630-10</b> Orange County Water District Mid Basin Centennial Park Injection Wells Project	The proposed project consists of the construction and operation of four underground injection wells at Centennial Park and the construction and operation of a monitoring well at Heritage Museum. Reference: ORC150623-09  Comment Period: 7/7/2015 - 8/6/2015 Public Hearing: N/A	Recirculated Notice of Preparation	Orange County Water District	Preparing written comments
<i>Waste and Water-related</i> <b>RVC150605-01</b> Lakeview Pipeline Repair Project	The proposed project consists of relining the Lakeview Pipeline (LVP) with a steel pipe liner. The project would also include installation of an approximately 1,000-linear-foot pipeline interconnection between the LVP and the Perris Bypass Pipeline at Metropolitan's Lake Perris Pressure Control Structure Facility.  Comment Period: 6/5/2015 - 7/6/2015 Public Hearing: N/A	Draft Mitigated Negative Declaration	Metropolitan Water District of Southern California	Preparing written comments
<i>Waste and Water-related</i> <b>RVC150624-01</b> Camino Sierra Pressure Zone Conversion	The proposed project consists of the construction of approximately 8,200 linear feet of 12-inch and 8-inch diameter water distribution pipelines to convert an area of low service pressure to the adjacent 2350 pressure zone. The Project will improve water pressure along Camino Sierra Road and De Portola Road.  Comment Period: 6/25/2015 - 7/24/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	Rancho California Water District	Document reviewed - No comments sent

# - Project has potential environmental justice concerns due to the nature and/or location of the project.

\*Disposition may change prior to Governing Board Meeting.

Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.



**ATTACHMENT A-1  
INCOMING CEQA DOCUMENTS LOG  
JUNE 1, 2015 TO JUNE 30, 2015**

SCAQMD LOG-IN NUMBER PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<b>Waste and Water-related</b> <b>SBC150630-19</b> Proposed Cucamonga Crosswalls Maintenance Project	The proposed project consists of repairing the existing crosswalls used for water conservation by capturing the local storm flows and improving the percolation back into the existing groundwater basin. The project also involves the excavation and removal of approximately 200,000 cubic yards of aggregate material which will result in the stockpiling and sorting of material, then hauling the material off-site for construction projects.  Comment Period: 6/29/2015 - 7/29/2015                      Public Hearing: 8/11/2015	Draft Mitigated Negative Declaration	City of Upland	Under review, may submit written comments
<b>Utilities</b> <b>LAC150612-02</b> Mesa 500-kV Substation Project	The proposed project consists of constructing a new Mesa 500-Kilovolt Substation Project to rebuild and upgrade a portion of its transmission infrastructure in the Western Los Angeles Basin.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/nopmesa500kv.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/nopmesa500kv.pdf</a> Comment Period: 6/5/2015 - 7/5/2015                      Public Hearing: N/A	Notice of Preparation	California Public Utilities Commission	SCAQMD staff commented 6/18/2015
<b>Utilities</b> <b>LAC150625-05</b> ENV-2015-400/ 214 E. Pico Blvd: Central City	The proposed project consists of a Conditional Use Permit to allow the construction/installation of a wireless telecommunications facility on a rooftop on an existing building. The installation consists of 12 panel antennas, 12 remote radio units and, three ray caps divided into three sectors all to be screened by a wall and located on the roof of the existing building.  Comment Period: 6/25/2015 - 7/15/2015                      Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	Preparing written comments
<b>Utilities</b> <b>RVC150624-03</b> Solar Power Res-BCT Project	The proposed project consists of the construction, operation and maintenance of a 5.1-megawatt solar power photovoltaic generating facility within a 45-acre portion of a 60-acre site.  Comment Period: 6/25/2015 - 7/24/2015                      Public Hearing: N/A	Draft Mitigated Negative Declaration	Rancho California Water District	Document reviewed - No comments sent
<b>Utilities</b> <b>SBC150616-03</b> 15-CUP-07	The proposed project consists of a disguised wireless telecommunications facility that includes the installation of a 60-inch monopine to include twelve panel antennas and two parabolic antennas in a 100-square-foot tower lease area.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/mndcell15cup07.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/mndcell15cup07.pdf</a> Comment Period: 6/16/2015 - 6/24/2015                      Public Hearing: N/A	Initial Project Consultation	City of Beaumont	SCAQMD staff commented 6/18/2015

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<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<b>Transportation</b> <b>ORC150611-09</b> Metrolink Parking Structure Project	The proposed project consists of constructing a new parking structure at the northwest corner of Chapman Avenue and Lemon Street in Orange. The proposed structure would provide 611 parking spaces on five levels.  Comment Period: 6/10/2015 - 7/15/2015 Public Hearing: 7/8/2015	Notice of Availability of a Draft Mitigated Negative Declaration	City of Orange	Document reviewed - No comments sent
<b>Institutional (schools, government, etc.)</b> <b>LAC150616-05</b> Olive Vista Middle School	The proposed project consists of facility upgrades including the demolition of the Multi-Purpose Room/Lunch Pavilion/Student Store building and the Physical Education building and construction of two new replacement buildings with similar functions.  Comment Period: 6/16/2015 - 7/14/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	Los Angeles Unified School District	Document reviewed - No comments sent
<b>Institutional (schools, government, etc.)</b> <b>LAC150618-14</b> Los Angeles County Consolidated Correctional Treatment Facility Project	The proposed project consists of the on-site modernized replacement of the County's Men's Central Jail to provide mental health, substance use disorder, and medical treatment, and educational program and reentry counseling to reduce recidivism and connect inmates with community resources upon release.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/nopcorrectional.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/nopcorrectional.pdf</a> Comment Period: 6/18/2015 - 7/17/2015 Public Hearing: N/A	Notice of Preparation	County of Los Angeles	SCAQMD staff commented 6/24/2015
<b>Institutional (schools, government, etc.)</b> <b>LAC150625-04</b> ENV-2014-4266/ 4921 S. Crenshaw Blvd; West Adams	The proposed project consists of the construction, use and maintenance of a new three-level parking structure serving the Bethesda Temple Church.  Comment Period: 6/25/2015 - 7/15/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	Document reviewed - No comments sent
<b>Institutional (schools, government, etc.)</b> <b>LAC150630-01</b> North High School Auditorium Project	The proposed project consists of the construction and operation of a new 13,900-square-foot auditorium.  Comment Period: 6/30/2015 - 7/29/2015 Public Hearing: 9/15/2015	Draft Mitigated Negative Declaration	Torrance Unified School	Document reviewed - No comments sent

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<i>Institutional (schools, government, etc.)</i> <b>LAC150630-02</b> South High School Auditorium Project	The proposed project consists of the construction and operation of a new 13,900-square-foot auditorium.  Comment Period: 6/30/2015 - 7/29/2015 Public Hearing: 9/15/2015	Draft Mitigated Negative Declaration	Torrance Unified School District	Document reviewed - No comments sent
<i>Institutional (schools, government, etc.)</i> <b>LAC150630-03</b> West High School Auditorium Project	The proposed project consists of the construction and operation of a new 13,900-square-foot auditorium.  Comment Period: 6/30/2015 - 7/29/2015 Public Hearing: 9/15/2015	Draft Mitigated Negative Declaration	Torrance Unified School District	Document reviewed - No comments sent
<i>Institutional (schools, government, etc.)</i> <b>LAC150630-04</b> Torrance Unified School District Aquatic Center Project	The proposed project consists of the construction and operation of a new aquatic center that would accommodate all four District high schools' aquatic programs.  Comment Period: 6/30/2015 - 7/29/2015 Public Hearing: 9/15/2015	Draft Mitigated Negative Declaration	Torrance Unified School District	Document reviewed - No comments sent
<i>Institutional (schools, government, etc.)</i> <b>LAC150630-05</b> Casimir Middle School Gymnasium Project	The proposed project consists of the construction and operation of a new 7,500-square-foot gymnasium.  Comment Period: 6/30/2015 - 7/29/2015 Public Hearing: 9/15/2015	Draft Mitigated Negative Declaration	Torrance Unified School District	Document reviewed - No comments sent
<i>Institutional (schools, government, etc.)</i> <b>LAC150630-06</b> Jefferson Middle School Gymnasium Project	The proposed project consists of the construction and operation of a 7,500-square-foot new gymnasium.  Comment Period: 6/30/2015 - 7/29/2015 Public Hearing: 9/15/2015	Draft Mitigated Negative Declaration	Torrance Unified School District	Document reviewed - No comments sent

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<i>Institutional (schools, government, etc.)</i> <b>LAC150630-14</b> 2015 Firestone Education Center Master Plan	The proposed project consists of the construction and operation of a new Los Angeles Community College District satellite campus to replace the existing South Gate Education Center.  Comment Period: 6/30/2015 - 7/25/2015 Public Hearing: N/A	Notice of Preparation	Los Angeles Community College District	Preparing written comments
<i>Institutional (schools, government, etc.)</i> <b>SBC150605-02</b> DRC2014-00931 and CUP DRC2014-00932	The proposed project consists of expanding the existing Rancho Cucamonga Fire Protection District Station Number 174. The proposed structures include a new fire training center, warehouse/parts-storage building, fitness building, training house and multi-story training tower for a total of 38,909 square feet of new structures.  Comment Period: 6/5/2015 - 7/22/2015 Public Hearing: N/A	Draft Mitigated Negative Declaration	City of Rancho Cucamonga	Under review, may submit written comments
<i>Medical Facility</i> <b>LAC150618-11</b> ENV-2015-310/4470/4494 De Longpre Ave; Hollywood	The proposed project consists of demolition of two one-story Hollywood Presbyterian Medical Center maintenance buildings; and adjacent one-story single-family home; and surface parking lots; and construction of a new parking structure that would include 654 parking spaces for patients, visitors and employees.  Comment Period: 6/18/2015 - 7/8/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	Preparing written comments
<i>Retail</i> <b>LAC150604-10</b> Walmart Supercenter	The proposed project consists of the construction and operation of a new 182,429-square-foot Walmart Supercenter on a 15.41-acre site. Reference LAC141128-06  Comment Period: N/A Public Hearing: 6/9/2015	Notice of a Public Hearing	City of El Monte	Document reviewed - No comments sent
<i>Retail</i> <b>RVC150623-02</b> Pedley Crossings Shopping Center	The proposed project consists of a 300,000 square-foot commercial development, including retail stores, restaurants, and a fuel center, on 30.42 acres. The site which is currently vacant, would be replaced with one-to-two story structures, parking areas, and landscaping. A subdivision of the existing four parcels into 13 parcels is proposed. Reference RVC140708-03  Comment Period: N/A Public Hearing: N/A	Response to Comments	City of Jurupa	Document reviewed - No comments sent

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<b>Retail</b> <b>SBC150623-07</b> Eastvale Marketplace (Planning Application No. 15-0958)	The proposed project consists of a 71,472-square-foot neighborhood retail center with multi-tenant and single-tenant buildings and associated parking facilities on 7.64 acres.  Comment Period: 6/22/2015 - 7/13/2015 Public Hearing: N/A	Draft Mitigated Negative Declaration	City of Eastvale	Document reviewed - No comments sent
<b>General Land Use (residential, etc.)</b> <b>LAC150602-09</b> Rowland Heights Plaza and Hotel Project	The proposed project consists of subdividing a 14.06-acre lot into three parcels, including one industrial parcel developed with commercial retail uses and two commercial parcels developed with hotels.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/noprowland.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/noprowland.pdf</a> Comment Period: 6/2/2015 - 6/18/2015 Public Hearing: N/A	Notice of Preparation	County of Los Angeles	SCAQMD staff commented 6/5/2015
<b>General Land Use (residential, etc.)</b> <b>LAC150604-01</b> ENV-2014-2868/ 1947 S. Sawtelle Blvd; West Los Angeles	The proposed project consists of demolishing a two-story commercial building and constructing a mixed-use apartment building including 72 dwelling units over 7,700 square feet of ground floor commercial space and two subterranean levels of automobile and bicycle parking space, on a lot covering approximately 28,156 square feet.  Comment Period: 6/4/2015 - 6/24/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	Document reviewed - No comments sent
<b>General Land Use (residential, etc.)</b> <b>LAC150604-02</b> ENV-2015-1136/ 3551-3559 W. 5th St. and 443-453 S. Kenmore Ave; Wilshire	The proposed project consists of demolishing 21 units within two multi-family buildings and one single-family dwelling for the construction, use, and maintenance of one new 69-unit apartment building consisting of five stories and 70,247 square feet, with residences over two stories of parking.  Comment Period: 6/4/2015 - 6/24/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	Document reviewed - No comments sent
<b>General Land Use (residential, etc.)</b> <b>LAC150604-06</b> ENV-2013-4029/ 411-439 S. Hamel Rd; Wilshire	The proposed project consists of constructing an 88-unit apartment building in the Wilshire Community Plan Area. The project involves the demolition of five residential buildings, on-site grading and the export of approximately 33,000 cubic yards of excavated materials.  Comment Period: 6/4/2015 - 6/24/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	Under review, may submit written comments

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<i>General Land Use (residential, etc.)</i> <b>LAC150609-03</b> CUP 14-18 and ADR 15-14	The proposed project consists of a four-story mixed-use development, which consists of three stories of residential units, 17,850 square feet of ground floor commercial uses, and two levels of subterranean parking.  Comment Period: 6/2/2015 - 6/22/2015 Public Hearing: 6/23/2015	Draft Mitigated Negative Declaration	City of Arcadia	Document reviewed - No comments sent
<i>General Land Use (residential, etc.)</i> <b>LAC150610-03</b> The Avalon	The proposed project consists of a mixed-use development with 357 apartment units and 32,000 square feet of commercial space on a 5.5-acre site. Reference LAC150408-01  Comment Period: N/A Public Hearing: N/A	Final Mitigated Negative Declaration	City of Carson	Document reviewed - No comments sent
<i>General Land Use (residential, etc.)</i> <b>LAC150612-06</b> The Enclave at Upland	The proposed project consists of implementation of the Enclave at Upland Specific Plan. The proposed plan will facilitate the development of up to 350 attached or detached dwelling units and approximately 0.83 acres of private recreational and park space on an approximately 19.04-gross-acre site.  Comment Period: 6/11/2015 - 7/13/2015 Public Hearing: N/A	Draft Mitigated Negative Declaration	City of Upland	Document reviewed - No comments sent
<i>General Land Use (residential, etc.)</i> <b>LAC150612-10</b> Sunset & Everett Mixed-Use Development Project and Everett Small Lot Subdivision	The proposed project consists of six single-family residences for a small lot division as well as two separate buildings containing a total of 204 residential units, 11,334 square feet of retail, and a total of 294 parking spaces and 232 bicycle parking spaces for the mixed-use development.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/nopsunseteverett.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/nopsunseteverett.pdf</a> Comment Period: 6/12/2015 - 7/13/2015 Public Hearing: 6/30/2015	Notice of Preparation	City of Los Angeles	SCAQMD staff commented 6/18/2015
<i>General Land Use (residential, etc.)</i> <b>LAC150618-01</b> ENV-2014-4875/ 600 E. L St; Wilmington-Harbor City	The proposed project consists of constructing nine single-family homes with a combined floor area of approximately 10,350 square feet on an approximately 59,178-square-foot vacant lot.  Comment Period: 6/18/2015 - 7/8/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	Preparing written comments

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<b>General Land Use (residential, etc.)</b> <b>LAC150618-02</b> ENV-2015-712/438 S. Lake St; Westlake	The proposed project consists of the construction, use and maintenance of a five-story, 80-unit multi-family residential building with two subterranean parking levels for 154 parking spaces, and a minimum of 7,000 square feet of common open space and 4,000 square feet of private open space located on an approximately 32,769-square-foot lot.  Comment Period: 6/18/2015 - 7/8/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	Preparing written comments
<b>General Land Use (residential, etc.)</b> <b>LAC150618-03</b> ENV-2015-868/ 330 N. Fairfax Ave; Wilshire	The proposed project consists of construction of a three-story, 28,341-square-foot office building and service center for the Jewish Family Service of Los Angeles that will include a three-level subterranean parking garage.  Comment Period: 6/18/2015 - 7/8/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	Preparing written comments
<b>General Land Use (residential, etc.)</b> <b>LAC150618-04</b> ENV-2014-3359/ 7521 W. Forest Glen; Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass	The proposed project consists of a request for a haul route for the export of 4,489 cubic yards of dirt from the site, for the construction of a single-family dwelling on an approximately 145,733-square-foot vacant site.  Comment Period: 6/18/2015 - 7/8/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	Document reviewed - No comments sent
<b>General Land Use (residential, etc.)</b> <b>LAC150618-05</b> ENV-213-1830/ 500 S. Santa Fe Ave; Central City North	The proposed project consists of the construction of a five-story, 70-foot high, approximately 98,825-square-foot commercial office building with two levels of parking. The project proposes a total of 200 on-site vehicle parking spaces and 30 bicycle parking spaces.  Comment Period: 6/18/2015 - 7/20/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	Document reviewed - No comments sent
<b>General Land Use (residential, etc.)</b> <b>LAC150618-12</b> ENV-2014-1692/ 5327 N. Hermitage Ave; North Hollywood-Valley Village	The proposed project consists of demolishing four existing buildings and the construction of a 66,408-square-foot residential housing development, consisting of a four-story, 42-unit residential building, over subterranean parking.  Comment Period: 6/18/2015 - 7/8/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	Document reviewed - No comments sent

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<b>General Land Use (residential, etc.)</b> <b>LAC150625-06</b> ENV-2015-852/ 568 N. Tigertail Rd; Brentwood-Pacific Palisades	The proposed project consists of grading and constructing of a two-story, single-family residence. The project requires an approval of a haul route to permit the export of 5,100 cubic yards of dirt.  Comment Period: 6/25/2015 - 7/15/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	Document reviewed - No comments sent
<b>General Land Use (residential, etc.)</b> <b>LAC150625-08</b> ENV-2014-4507/ 327,331,401,403,405,407,409,411,411 1/2 Boylston St;	The proposed project consists of the demolition and removal of all existing buildings on the project site and development of an approximately 111,704 square feet of a 121-unit residential building.  Comment Period: 6/25/2015 - 7/27/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	Document reviewed - No comments sent
<b>General Land Use (residential, etc.)</b> <b>LAC150630-08</b> Pinewood at Phillips Ranch Residential Development Project	The proposed project consists of 124 single-family detached, small lot residences, and 6,000 square feet of retail space on approximately 13.94 acre site.  Comment Period: 6/30/2015 - 7/30/2015 Public Hearing: 8/12/2015	Draft Mitigated Negative Declaration	City of Pomona	Under review, may submit written comments
<b>General Land Use (residential, etc.)</b> <b>ORC150623-08</b> Marywood Residential Development Project	The proposed project consists of establishing no more than 40 single-family residences on approximately 16 acres of the project site.  Comment Period: 6/19/2015 - 8/3/2015 Public Hearing: N/A	Draft Environmental Impact Report	City of Orange	Document reviewed - No comments sent
<b>General Land Use (residential, etc.)</b> <b>RVC150603-01</b> Plot Plan No. 25831	The proposed project consists of expanding an existing hotel that includes a 30-room addition, a swimming pool, pool service building, and 30 additional parking spaces.  Comment Period: 6/3/2015 - 6/18/2015 Public Hearing: N/A	Initial Project Consultation	County of Riverside	Document reviewed - No comments sent

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<i><b>General Land Use (residential, etc.)</b></i> <b>SBC150619-02</b> Paradise Knolls Specific Plan (MA 14115)	The proposed project consists of the development of 650 total residential units and 30,000 square feet of neighborhood commercial retail uses.  Comment Period: 6/22/2015 - 8/5/2015                                      Public Hearing: N/A	Draft Environmental Impact Report	City of Jurupa Valley	Under review, may submit written comments
<i><b>General Land Use (residential, etc.)</b></i> <b>SBC150630-20</b> GPA DRC2013-00961, Tentative Tract Map SUBTT18936, Etiwanda Specific Plan Amendment DRC2013-00962, Tree Removal Permit DRC2014-00113, and Variance DRC214-00219	The proposed project consists of subdividing 8.32 acres of land into 17 lots. Sixteen lots are for residential purposes, with Lot 17 as the new boundaries for the existing church.  Comment Period: 7/8/2015 - 8/12/2015                                      Public Hearing: 8/12/2015	Draft Mitigated Negative Declaration	City of Rancho Cucamonga	Under review, may submit written comments
<i><b>Plans and Regulations</b></i> <b>LAC150612-05</b> Kensington Assisted Living Facility Project	The proposed project consists of the demolition of ten existing structures, and the construction and operation of a two-story building totaling approximately 80,000 gross square feet containing a 96-suite assisted living facility accommodating 130 people.  Comment Period: 6/11/2015 - 7/27/2015                                      Public Hearing: N/A	Draft Environmental Impact Report	City of Redondo Beach	Document reviewed - No comments sent
<i><b>Plans and Regulations</b></i> <b>LAC150616-01</b> Renewable Energy Ordinance	The proposed project consists of amending Title 22 - Planning and Zoning of the Los Angeles County Code to establish regulations for the development of small-scale wind and solar energy systems, utility-scale wind and solar facilities, and temporary meteorological towers in unincorporated Los Angeles County. Reference LAC150220-06  Comment Period: N/A    Public Hearing: 7/14/2015	Notice of a Public Hearing	County of Los Angeles	Document reviewed - No comments sent

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<i>Plans and Regulations</i> <b>LAC150623-05</b> Zoning Code Amendment No. 2015-02	The proposed project consists of amending Article XXV (Antennas and Communication Facilities) of the Walnut Municipal Code Chapter 25 (Zoning).  Comment Period: 6/15/2015 - 7/6/2015 Public Hearing: N/A	Notice of Availability of a Draft Negative Declaration	City of Walnut	Document does not require comments
<i>Plans and Regulations</i> <b>ODP150619-01</b> Division of Oil, Gas and Geothermal Resources Regulation SB 4	The proposed project consists of newly enacted legislation, requiring new regulations for well stimulation and hydraulic fracturing activities. Reference ODP150114-20.  Comment Period: N/A Public Hearing: N/A	Response to Comments	California Department of Conservation	Document reviewed - No comments sent
<i>Plans and Regulations</i> <b>ORC150602-10</b> Anaheim Canyon Specific Plan	The proposed project consists of a specific plan that would consolidate two specific plans (the Northeast Area Specific Plan and the Pacificcenter Anaheim Specific Plan) and the Scenic Corridor Overlay Zone into one new specific plan.  Comment Period: 5/28/2015 - 7/13/2015 Public Hearing: 8/24/2015	Draft Environmental Impact Report	City of Anaheim	Document reviewed - No comments sent
<i>Plans and Regulations</i> <b>RVC150605-03</b> General Plan Amendment No 960 and Climate Action Plan	The Riverside County General Plan serves as a blueprint for the future of Riverside County. The action evaluated by the Draft EIR is the adoption of Riverside County General Plan Amendment No. 960, the General Plan Update Project, which proposes a variety of revisions to the current Riverside County General Plan to update existing policies, maps and implementing directions, and provide new information and policies where needed. Reference RVC150219-10, RVC141128-06  Comment Period: N/A Public Hearing: 7/2/2015	Notice of a Public Hearing	County of Riverside	Document reviewed - No comments sent
<i>Plans and Regulations</i> <b>RVC150623-03</b> Lakeside Temescal Valley Specific Plan	The proposed project consists of a 536.7 acre Lakeside Temescal Valley Specific Plan and includes residential, community center, lake, parks, open space, trails and a 1.7 acre site south of Temescal Canyon Road. The majority of the site would remain as open space with development of residential, recreational, and infrastructure occurring on approximately 59.4 net acres in the southern portion of the site. <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/noplakesidesp.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/noplakesidesp.pdf</a> Comment Period: 6/19/2015 - 8/18/2015 Public Hearing: N/A	Notice of Preparation	County of Riverside	SCAQMD staff commented 6/25/2015

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**ATTACHMENT B-1**  
**ONGOING ACTIVE PROJECTS FOR WHICH SCAQMD HAS**  
**OR IS CONTINUING TO CONDUCT A CEQA REVIEW**

SCAQMD LOG-IN NUMBER PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<b><i>General Land Use (residential, etc.)</i></b> <b>LAC150528-02</b> ENV-2014-2868/ 1947 S. Sawtelle Blvd; West Los Angeles	The proposed project consists of demolishing a commercial building and constructing a new mixed-use apartment building, including 72 dwelling units over 7,700 square feet of ground floor commercial space and two subterranean levels of parking spaces on approximately 28,156 square feet of floor area. Approximately 18,000 cubic yards of dirt will be exported from the site.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/mmd20142868.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/mmd20142868.pdf</a> Comment Period: 5/28/2015 - 6/17/2015                                      Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	SCAQMD staff commented 6/2/2015
<b><i>General Land Use (residential, etc.)</i></b> <b>LAC150528-05</b> ENV-2014-4910/ 340 N Mariposa Ave; Wilshire	The proposed project consists of constructing a four-story, 56-foot tall building with 14 residential units. The project includes the demolition of one multi-family building and the export of 9,950 cubic yards of dirt.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/env20144910.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/june/env20144910.pdf</a> Comment Period: 5/28/2015 - 6/29/2015                                      Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	SCAQMD staff commented 6/5/2015

# - Project has potential environmental justice concerns due to the nature and/or location of the project.  
 \*Disposition may change prior to Governing Board Meeting.

**ATTACHMENT C-1  
ACTIVE SCAQMD LEAD AGENCY PROJECTS  
THROUGH JUNE 30, 2015**

PROJECT DESCRIPTION	PROPONENT	TYPE OF DOCUMENT	STATUS	CONSULTANT
<p>The Phillips 66 (formerly ConocoPhillips) Los Angeles Refinery Ultra Low Sulfur Diesel project was originally proposed to comply with federal, state and SCAQMD requirements to limit the sulfur content of diesel fuels. Litigation against the CEQA document was filed. Ultimately, the California Supreme Court concluded that the SCAQMD had used an inappropriate baseline and directed the SCAQMD to prepare an EIR, even though the project has been built and has been in operation since 2006. The purpose of this CEQA document is to comply with the Supreme Court's direction to prepare an EIR.</p>	<p>Phillips 66 (formerly ConocoPhillips), Los Angeles Refinery</p>	<p>Environmental Impact Report (EIR)</p>	<p>The Notice of Preparation/ Initial Study (NOP/IS) was circulated for a 30-day public comment period on March 26, 2012 to April 26, 2012. The consultant submitted the administrative Draft EIR to SCAQMD in late July 2013. The Draft EIR was circulated for a 45-day public review and comment period from September 30, 2014 to November 13, 2014. Two comment letters were received and responses to comments are being prepared.</p>	<p>Environmental Audit, Inc.</p>
<p>Tesoro Refinery proposes to integrate the Tesoro Wilmington Operations with the Tesoro Carson Operations (former BP Refinery). The proposed project also includes modifications of storage tanks at both facilities, new interconnecting pipelines, and new electrical connections. In addition, Carson's Liquid Gas Rail Unloading facilities will be modified. The proposed project will be designed to comply with the federally mandated Tier 3 gasoline specifications and with State and local regulations mandating emission reductions.</p>	<p>Tesoro Refining and Marketing Company Los Angeles Refinery</p>	<p>Environmental Impact Report (EIR)</p>	<p>A previous Draft Negative Declaration was withdrawn in order for the storage tank project to be analyzed in a new CEQA document that also addresses the Tesoro-BP Refinery Integration Project. A NOP/IS was prepared for the integration project and released for a 30-day public review and comment period from September 10, 2014 to October 10, 2014. 86 comment letters were received, and responses to comments are being prepared. The consultant is preparing a Draft EIR.</p>	<p>Environmental Audit, Inc.</p>
<p>Quemetco is proposing an increase in the daily furnace feed rate.</p>	<p>Quemetco</p>	<p>Environmental Impact Report (EIR)</p>	<p>An Initial Study has been prepared by the consultant and is under review by SCAQMD staff.</p>	<p>Trinity Consultants</p>
<p>Chevron is proposing modifications to its Product Reliability and Optimization (PRO) Project and has applied for a modification to its permit to increase the firing duty of its Tail Gas Unit to meet current BACT requirements.</p>	<p>Chevron</p>	<p>Addendum</p>	<p>An addendum to the 2008 Final EIR has been prepared by the consultant. Staff has reviewed the Addendum and provided edits to the consultant. Staff is reviewing responses to comments on the permit applications.</p>	<p>Environmental Audit, Inc.</p>

A shaded row indicates a new project.

**ATTACHMENT C-1  
ACTIVE SCAQMD LEAD AGENCY PROJECTS  
THROUGH JUNE 30, 2015**

PROJECT DESCRIPTION	PROPONENT	TYPE OF DOCUMENT	STATUS	CONSULTANT
Breitburn Operating LP is proposing to upgrade their fluid handling systems to facilitate an increase in the amount of produced water that can be treated at the site in Sante Fe Springs.	Breitburn Operating LP	Environmental Impact Report (EIR)	The NOP/IS was released for a 30-day public review and comment period from December 4, 2014 to January 2, 2015. Two comment letters were received related to the NOP/IS and responses are being prepared. The Draft EIR was released for 45-day public review and comment period from April 15, 2015 to May 29, 2015. Two comment letters were received relative to the Draft EIR. Responses to the comments have been prepared and provided to the Department of Conservation, Division of Oil, Gas and Geothermal Resources.	Environ
DCOR LLC is proposing to install three flares on their off-shore oil Platform Esther.	DCOR LLC	Mitigated Negative Declaration	A preliminary draft Mitigated Negative Declaration has been prepared by the consultant and is under review by SCAQMD staff.	RBF Consulting

A shaded row indicates a new project.

**ATTACHMENT A-2<sup>\*</sup>**  
**INCOMING CEQA DOCUMENTS LOG**  
**JULY 1, 2015 TO JULY 31, 2015**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<b><i>Warehouse &amp; Distribution Centers</i></b> <b>LAC150701-02</b> 2001 Mission Warehouse	The proposed project consists of six warehouse buildings totaling approximately 432,932 square feet including 56,750 square feet of office space on 20.19 acres. An existing three-story industrial building will be demolished.  Comment Period: 7/2/2015 - 7/20/2015 Public Hearing: N/A	Draft Mitigated Negative Declaration	City of Pomona	Document reviewed - No comments sent
<b><i>Warehouse &amp; Distribution Centers</i></b> <b>LAC150722-03</b> Alondra Boulevard Business Center	The proposed project consists of constructing a 199,588-square-foot concrete tilt-up warehouse building with ancillary office space within an 8.89-acre site.  Comment Period: 7/22/2015 - 8/10/2015 Public Hearing: 8/20/2015	Draft Mitigated Negative Declaration	City of La Mirada	Document reviewed - No comments sent
<b><i>Warehouse &amp; Distribution Centers</i></b> <b>ORC150721-02</b> The Heritage Mixed-Use Project	The proposed project consists of developing a 366,000-square-foot warehouse/distribution warehouse building on an 18.84-acre site. The project would provide three mixed-use buildings that would include 1,221 multi-family apartments; 12,675 square feet of retail commercial space; and 5,415 square feet of restaurant space.  Comment Period: 7/17/2015 - 8/31/2015 Public Hearing: N/A	Draft Environmental Impact Report	City of Santa Ana	Under review, may submit written comments
<b><i>Warehouse &amp; Distribution Centers</i></b> <b>RVC150707-04</b> GPA No. 1151, CZ No. 7875, PM No. 36950 and PP No. 25838	The proposed project consists of construction of a 702,645-square-foot warehouse/distribution center with 109 truck-loading bays, 320 parking stalls, and all other necessary and required improvements on the project site and along the adjacent street.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/warenopgpa1151.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/warenopgpa1151.pdf</a> Comment Period: 7/7/2015 - 7/16/2015 Public Hearing: N/A	Initial Project Consultation	County of Riverside	SCAQMD staff commented 7/14/2015
<b><i>Warehouse &amp; Distribution Centers</i></b> <b>RVC150707-08</b> Center Street Commerce Center	This document consists of a Preliminary Air Quality Review. The proposed project consists of construction of a 308,000-square-foot warehouse on 15.63 acres. The warehouse includes 110,591 square feet of landscaping, the potential for up to 282 parking stalls, and 47 loading docks.  Comment Period: N/A Public Hearing: N/A	Other	City of Riverside	Under review, may submit written comments

\*Sorted by Land Use Type (in order of land uses most commonly associated with air quality impacts), followed by County, then date received.

# - Project has potential environmental justice concerns due to the nature and/or location of the project.

Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

**ATTACHMENT A-2  
INCOMING CEQA DOCUMENTS LOG  
JULY 1, 2015 TO JULY 31, 2015**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Warehouse &amp; Distribution Centers</i> <b>RVC150729-02</b> Optimus Logistics Center 2	The proposed project consists of a high-cube warehouse development consisting of two buildings totaling approximately 1,037,811 square feet on a 48.4-acre-site.  Comment Period: 7/29/2015 - 9/11/2015 Public Hearing: N/A	Draft Environmental Impact Report	City of Perris	Preparing written comments
<i>Warehouse &amp; Distribution Centers</i> <b>SBC150707-14</b> World Logistics Center (Highland Fairview)	The proposed project consists of a new 2,610 acre Specific Plan envisioned to accommodate up to 40.6 million square feet of high-cube industrial warehouse distribution development and related uses on approximately 3,818 acres. Reference RVC150430-07 <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/august/feirworld080715.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/august/feirworld080715.pdf</a> Comment Period: N/A Public Hearing: 8/17/2015	Notice of a Public Hearing	City of Moreno Valley	SCAQMD staff commented 8/7/2015 August report will note additional staff comments and testimony to the City Council. <b>Testified at Public Hearing</b>
<i>Warehouse &amp; Distribution Centers</i> <b>SBC150708-01</b> Slover Avenue Distribution Center	The proposed project consists of redeveloping a property with a 671,324-square-foot distribution warehouse structure. Reference SBC141105-01  Comment Period: 7/10/2015 - 8/24/2015 Public Hearing: N/A	Draft Environmental Impact Report	City of Fontana	Preparing written comments
<i>Warehouse &amp; Distribution Centers</i> <b>SBC150714-11</b> Kimball Business Park	The proposed project consists of the construction and operation of approximately 1,203,050 square feet of warehouse and light industrial/business park uses on approximately 70 acres.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/warehousekimball.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/warehousekimball.pdf</a> Comment Period: 7/13/2015 - 8/11/2015 Public Hearing: N/A	Notice of Preparation	City of Chino	SCAQMD staff commented 7/22/2015
<i>Warehouse &amp; Distribution Centers</i> <b>SBC150728-03</b> P201500122-CF	The proposed project consists of constructing a 676,983-square-foot warehouse building on 34.54 acres.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/august/p201500122.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/august/p201500122.pdf</a> Comment Period: 7/28/2015 - 8/6/2015 Public Hearing: N/A	Initial Project Consultation	County of San Bernardino	SCAQMD staff commented 8/5/2015

# - Project has potential environmental justice concerns due to the nature and/or location of the project.

Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.



**ATTACHMENT A-2  
INCOMING CEQA DOCUMENTS LOG  
JULY 1, 2015 TO JULY 31, 2015**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Airports</i> <b>LAC150724-04</b> Runway 6R-Airport	The proposed project includes relocating the end of Runway 6R approximately 200 feet to the east and displacing the threshold of Runway 6R approximately 500 feet.  Comment Period: N/A Public Hearing: N/A	Finding of No Significant Impact Records of Decisions	Los Angeles World Airports	Document reviewed - No comments sent
<i>Industrial and Commercial</i> <b>LAC150707-05</b> 500 South Douglas Street and 2330 Utah Ave Project	The project consists of the demolition of two industrial buildings and the construction of a two-story commercial office building with a ground floor parking level containing 276 parking spaces and an approximately 80,517 gross square-foot second floor office level.  Comment Period: 7/2/2015 - 8/3/2015 Public Hearing: N/A	Draft Mitigated Negative Declaration	City of El Segundo	Document reviewed - No comments sent
<i>Industrial and Commercial</i> <b>LAC150714-08</b> Public Storage #08207 999 East Lambert Road La Habra, CA	The proposed project consists of the construction and operation of a new personal storage facility next to an existing Public Storage operation. The new construction will consist of a new three-story building that will have a total floor area of 133,512 square feet.  Comment Period: 7/10/2015 - 8/10/2015 Public Hearing: 8/10/2015	Draft Mitigated Negative Declaration	City of La Habra	Document reviewed - No comments sent
<i>Industrial and Commercial</i> <b>LAC150724-01</b> Jefferson and La Cienga Project	The proposed project consists of demolition and removal of all existing structures and the development of approximately 1,900,000-square-foot transit-oriented, mixed-use structure. The project includes 1,218 multi-family residential units and 300,000 square feet of commercial floor area on the lower ground floors. The commercial space would include 200,000 square feet of office space, 50,000 square feet of grocery store, 20,000 square feet of restaurant space, and 30,000 square feet of general retail.  Comment Period: 7/23/2015 - 9/6/2015 Public Hearing: 9/6/2015	Notice of Availability of a Draft Environmental Impact Report	City of Los Angeles	Under review, may submit written comments
<i>Industrial and Commercial</i> <b>LAC150730-08</b> West Covina Self Storage Project	The proposed project consists of the construction of a new 78,474-square-foot public storage facility.  Comment Period: 8/3/2015 - 8/24/2015 Public Hearing: N/A	Draft Mitigated Negative Declaration	City of West Covina	Document reviewed - No comments sent

# - Project has potential environmental justice concerns due to the nature and/or location of the project.

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**ATTACHMENT A-2  
INCOMING CEQA DOCUMENTS LOG  
JULY 1, 2015 TO JULY 31, 2015**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Industrial and Commercial</i> <b>RVC150722-04</b> City of Menifee Planning Application No. 2015-156 "All Star Super Storage"	The proposed project consists of the development of a fifteen-building, 242,150-square-foot public storage facility on 9.77 acres.  Comment Period: 7/22/2015 - 8/10/2015 Public Hearing: N/A	Initial Project Consultation	City of Menifee	Document reviewed - No comments sent
<i>Industrial and Commercial</i> <b>SBC150707-02</b> 15-PP-03	The proposed project consists of a 62,030-square-foot commercial center with five single story buildings on a vacant 7.07-acre lot.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/pcware15pp03.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/pcware15pp03.pdf</a> Comment Period: 7/1/2015 - 7/22/2015 Public Hearing: N/A	Initial Project Consultation	City of Beaumont	SCAQMD staff commented 7/14/2015
<i>Industrial and Commercial</i> <b>SBC150721-04</b> P201500319/RMC	The proposed project consists of revisions to an approved action on a 2,400-square-foot, two-story modular building for an employee locker room with offices for an existing industrial complex on 227 acres.  Comment Period: 7/21/2015 - 7/30/2015 Public Hearing: N/A	Initial Project Consultation	County San Bernardino	Document reviewed - No comments sent
<i>Industrial and Commercial</i> <b>SBC150728-02</b> P201500107/RMC	The proposed project consists of revisions to approve an action to authorize a vehicle sales dealership within an existing 2,232-square-foot retail store.  Comment Period: 7/28/2015 - 8/7/2015 Public Hearing: N/A	Other	County of San Bernardino	Document reviewed - No comments sent
<i>Waste and Water-related</i> <b>ALL150724-03</b> General Water Discharge Requirements for Composting Operations	The proposed project consists of a general order to be used by the Regional Water Quality Control Board to streamline the permitting process and protect water quality. Reference ALL150113-20  Comment Period: N/A Public Hearing: 8/4/2015	Response to Comments	California State Water Resources Control Board	Document reviewed - No comments sent

# - Project has potential environmental justice concerns due to the nature and/or location of the project.

Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

**ATTACHMENT A-2  
INCOMING CEQA DOCUMENTS LOG  
JULY 1, 2015 TO JULY 31, 2015**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Waste and Water-related</i> <b>LAC150707-03</b> West Basin Municipal Water District	The proposed project consists of expanding the facility to meet additional recycled water demand from the Tesoro Carson Refinery in Carson. The project includes the construction of an additional 2,779 acre-feet per year of microfiltration treatment capacity.  Comment Period: 7/7/2015 - 8/11/2015 Public Hearing: N/A	Draft Mitigated Negative Declaration	West Basin Municipal Water District	Document reviewed - No comments sent
<i>Waste and Water-related</i> <b>LAC150707-06</b> San Jacinto Valley Enhanced Recharge and Recovery Program	The proposed project consists of a number of facilities that are planned to be phased in over time, to accommodate the goal of storage capacity of up to 128,000 acre feet.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/nopsanjaacvalley.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/nopsanjaacvalley.pdf</a> Comment Period: 7/7/2015 - 7/30/2015 Public Hearing: N/A	Notice of Preparation	Eastern Municipal Water District	SCAQMD staff commented 7/14/2015
<i>Waste and Water-related</i> <b>LAC150707-11</b> International Light Metal Facility	The proposed project consists of proposed remedies to clean up groundwater contamination at the former International Light Metals manufacturing facility in Torrance. Reference: LAC150423-18  Comment Period: N/A Public Hearing: N/A	Response to Comments	Department of Toxic Substances Control	Document does not require comments
<i>Waste and Water-related</i> <b>LAC150707-13</b> The Parks at Monrovia Station Square Proposed Removal Action Workplan	The proposed project consists of a Removal Action Workplan to excavate heavy metal impacted soil for transportation to a licensed off-site disposal facility.  Comment Period: 7/6/2015 - 8/4/2015 Public Hearing: N/A	Community Notice	Department of Toxic Substances Control	Document reviewed - No comments sent
<i>Waste and Water-related</i> <b>LAC150708-02</b> Big Tujunga Wash at Oro Vista Avenue Maintenance Program	The proposed project consists of long-term clearing, cleaning, maintaining, repairing and restoring of Oro Vista Avenue and associated berms, swales, and shoulders that are located within the Big Tujunga Wash.  Comment Period: 7/2/2015 - 8/3/2015 Public Hearing: N/A	Notice of Availability of a Draft Negative Declaration	City of Los Angeles	Document reviewed - No comments sent

# - Project has potential environmental justice concerns due to the nature and/or location of the project.

Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

**ATTACHMENT A-2  
INCOMING CEQA DOCUMENTS LOG  
JULY 1, 2015 TO JULY 31, 2015**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Waste and Water-related</i> <b>LAC150708-04</b> Palos Verdes Reservoir Upgrades Project	This document consists of a notification of board meeting to adopt the Palos Verdes Reservoir. The proposed project consists of removing the upper portion of the outlet tower down to grade, replacing the valves and operating system, relining the reservoir with asphalt and a geomembrane liner, and replacing the geomembrane floating cover. Reference LAC150324-03  Comment Period: N/A Public Hearing: 7/14/2015	Notice of a Public Hearing	Metropolitan Water District of Southern California	Document does not require comments
<i>Waste and Water-related</i> <b>LAC150710-01</b> Weber Metals Project	The proposed project consists of constructing a 115,000-square-foot industrial building for a new 60,000-ton forging press, forge die storage, and furnaces, which would expand both the capacity and capabilities of the existing manufacturing operations.  Comment Period: N/A Public Hearing: 7/16/2015	Response to Comments and Public Hearing Notice	City of Long Beach	Document reviewed - No comments sent
<i>Waste and Water-related</i> <b>LAC150710-02</b> Solid Waste Facilities Permit Revision for the Calabasas Landfill (19-AA-0056)	The proposed project consists of a revised Solid Waste Facility Permit. The Solid Waste Facility Permit revision will reflect the actual hours of ancillary landfill operations, correct prior inaccuracies in the refuse footprint, and incorporate the changes in the permitted landfill boundary resulting from the sale of a landfill parcel to the City of Calabasas for the Lost Hills Road Interchange Modification Project.  Comment Period: N/A Public Hearing: N/A	Other	County Sanitation District of Los Angeles	Document reviewed - No comments sent
<i>Waste and Water-related</i> <b>LAC150715-01</b> Calsol Property Cleanup	The proposed project consists of the cleanup of tetrachloroethene and trichloroethene that have been found in the soil, soil vapors and groundwater on the CalSol site and in the neighborhood.  Comment Period: 7/10/2015 - 8/8/2015 Public Hearing: 7/30/2015	Community Notice	Department of Toxic Substances Control	Document reviewed - No comments sent
<i>Waste and Water-related</i> <b>LAC150721-06</b> Rainbow Transport Tank Cleaners to Conduct Soil Vapor Sampling at Del Amo Elementary School	The proposed project consists of the installation of 12 soil vapor wells to about 10-feet in depth and then collecting vapor samples from the wells.  Comment Period: N/A Public Hearing: N/A	Community Notice	Department of Toxic Substances Control	Document reviewed - No comments sent

# - Project has potential environmental justice concerns due to the nature and/or location of the project.

Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

**ATTACHMENT A-2  
INCOMING CEQA DOCUMENTS LOG  
JULY 1, 2015 TO JULY 31, 2015**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Waste and Water-related</i> <b>LAC150721-08</b> Closure and Cleanup of Exide Technologies Facility in Vernon	This document consists of a community update. As of July 16, 2015, 130 properties have been cleaned up and a total of 7,023 tons of contaminated soil have been removed and disposed of safely. SCAQMD previously commented on the Exide Closure Plan. <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/exideclosure.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/exideclosure.pdf</a> Comment Period: N/A Public Hearing: 7/23/2016	Community Notice	Department of Toxic Substances Control	Document does not require comments
<i>Waste and Water-related</i> <b>ORC150729-01</b> Upper Newport Bay-East Bluff Drainage Repair Report	The proposed project consists of drainage improvements and erosion repair within a bluff on the eastern side of Upper Newport Bay. Extensive erosion of East Bluff along Back Bay Drive occurred due to the failure of existing drainage facilities, which has exposed and suspended the existing 30-inch corrugated steel pipe at the face of the bluff. The proposed project would eliminate an existing safety hazard and reduce future erosion of the bluff in the vicinity of the proposed site by removing and reconstructing existing bluff drainage facilities, repairing the eroded areas, and providing additional permanent erosion protection. Comment Period: 7/29/2015 - 8/24/2015 Public Hearing: N/A	Draft Mitigated Negative Declaration	County of Orange	Document reviewed - No comments sent
<i>Waste and Water-related</i> <b>RVC150702-13</b> Riverside North Aquifer Storage and Recovery Project	The proposed project consists of recharging the groundwater aquifers in the Riverside and Colton basins, improve groundwater quality of the Riverside and Colton basins, create drought storage, reduce dependence on imported water, maximize local groundwater production, maximize capture and use of local surface water, and provide seasonal storage. Comment Period: 6/30/2015 - 8/13/2015 Public Hearing: N/A	Draft Environmental Impact Report	City of Riverside	Document reviewed - No comments sent
<i>Waste and Water-related</i> <b>RVC150714-06</b> Vista Chino Low-Water Crossing Bridge Replacement at Whitewater River Project	The proposed project consists of replacing the existing low-water crossing along Vista Chino at the Whitewater River between Gene Autry Trail and Carmela Drive in Palm Springs and Cathedral City, which are in the western Coachella Valley of Riverside County. Comment Period: 7/15/2015 - 8/13/2015 Public Hearing: N/A	Draft Mitigated Negative Declaration	City of Palm Springs	Document reviewed - No comments sent

# - Project has potential environmental justice concerns due to the nature and/or location of the project.

Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

**ATTACHMENT A-2  
INCOMING CEQA DOCUMENTS LOG  
JULY 1, 2015 TO JULY 31, 2015**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Waste and Water-related</i> <b>RVC150714-12</b> Coachella Valley Water District Chromium-6 Water Treatment Facilities Project	The proposed project consists of an ion exchange treatment plant approach for removing chromium-6 from affected drinking water wells.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/nopcoachellawater.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/nopcoachellawater.pdf</a> Comment Period: 7/10/2015 - 8/8/2015 Public Hearing: N/A	Notice of Preparation	Coachella Valley Water District	SCAQMD staff commented 7/22/2015
<i>Waste and Water-related</i> <b>RVC150717-01</b> Eastern Coachella Valley Stormwater Master Plan	The proposed project consists of the right-of-way acquisition and construction of storm drains, channels, levees, and the operation and maintenance of facilities identified in the Master Plan. The Master Plan is a comprehensive conceptual stormwater plan that identifies conceptual locations, alignments, and sizes for primary drainage facilities to address the current and future drainage needs of the approximately 207-square-mile Master Plan area.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/nopeastcoachella.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/nopeastcoachella.pdf</a> Comment Period: 7/17/2015 - 8/4/2015 Public Hearing: N/A	Notice of Preparation	Coachella Valley Water District	SCAQMD staff commented 7/23/2015
<i>Waste and Water-related</i> <b>RVC150729-03</b> Recycled Water Service Expansion	The proposed project consists of the construction and operation of recycled water distribution and storage facilities. The potential sources of recycled water for this system will come from the Western Riverside County Regional Wastewater Authority Treatment Plant in the City of Eastvale and/or the Inland Empire Utilities Agency's recycled water system in San Bernardino County.  Comment Period: 7/29/2015 - 8/27/2015 Public Hearing: N/A	Draft Mitigated Negative Declaration	Jurupa Community Services District	Document reviewed - No comments sent
<i>Waste and Water-related</i> <b>RVC150729-04</b> Quail Valley Sewer Improvements Subarea 9 - Phase I Project	The proposed project consists of providing gravity sewer services to 149 existing homes and 66 vacant lots. Approximately 1.6 miles of 8-inch diameter collection pipeline will be installed within the public right-of-way. The project would also include the construction of a new regional lift station and the construction of a new transport line to convey wastewater from the Subarea 9 - Phase I project area to the lift station.  Comment Period: 7/24/2015 - 8/24/2015 Public Hearing: N/A	Subsequent Draft Mitigated Negative Declaration	Eastern Municipal Water District	Document reviewed - No comments sent
<i>Waste and Water-related</i> <b>SBC150717-02</b> Corrective Action Complete Ashland Inc., 291 W. Adams Street, Colton	The proposed project consists of corrective actions for the Ashland property in Colton. In the past it operated as a polyester resins plant.  Comment Period: 7/16/2015 - 8/17/2015 Public Hearing: N/A	Community Notice	Department of Toxic Substances Control	Document reviewed - No comments sent

# - Project has potential environmental justice concerns due to the nature and/or location of the project.

Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.







**ATTACHMENT A-2  
INCOMING CEQA DOCUMENTS LOG  
JULY 1, 2015 TO JULY 31, 2015**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<b>Transportation</b> <b>RVC150722-02</b> Interstate 15/Limonite Avenue Interchange Improvements Project	The proposed project consists of improving the existing freeway interchange at Interstate 15 and Limonite Ave. The project would replace the existing Limonite Avenue overcrossing and would widen the roadway from four lanes to six lanes.  <p style="text-align: center;">Comment Period: 7/20/2015 - 8/19/2015                      Public Hearing: 8/6/2015</p>	Draft Mitigated Negative Declaration	California Department of Transportation	Under review, may submit written comments
<b>Transportation</b> <b>RVC150730-09</b> Interstate 15 Express Lanes Project	The proposed project consists of improving the Interstate 15 freeway between the Caljalco Road interchange and the State Route 60 interchange. The project would construct one to two tolled express lanes to run a distance of 14.6 miles.  <p style="text-align: center;">Comment Period: 7/30/2015 - 8/12/2015                      Public Hearing: 8/12/2015</p>	Draft Mitigated Negative Declaration	California Transportation Department	Under review, may submit written comments
<b>Institutional (schools, government, etc.)</b> <b>LAC150714-05</b> Santa Monica College - Malibu Campus	The proposed project consists of demolishing the existing Sheriff's Station building, and the new construction of a two-story above-grade, approximately 25,310-square-foot educational facility including an approximately 5,640-square-foot Community Sheriff's Substation and Emergency Operations and Planning Center on the ground level.  <p style="text-align: center;">Comment Period: 7/10/2015 - 9/7/2015                      Public Hearing: N/A</p>	Notice of Availability of a Draft Environmental Impact Report	Santa Monica Community College District	Under review, may submit written comments
<b>Institutional (schools, government, etc.)</b> <b>ORC150721-01</b> Golden West College Vision 2020 Facilities Master Plan	The proposed project consists of the construction of approximately 476,000 gross square feet of new academic, administrative, and auxiliary uses on the Golden West College campus.  <p style="text-align: center;">Comment Period: 7/17/2015 - 8/31/2015                      Public Hearing: N/A</p>	Draft Program Environmental Impact Report	Coast Colleges	Under review, may submit written comments
<b>Medical Facility</b> <b>LAC150701-03</b> Harbor-UCLA Medical Center Campus Master Plan Project	The proposed project consists of the Harbor-UCLA Medical Center Campus Master Plan to consider current conditions and future needs to the Harbor-UCLA Medical Center Hospital and Clinics.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/nopharborucla.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/nopharborucla.pdf</a>  <p style="text-align: center;">Comment Period: 7/1/2015 - 7/29/2015                      Public Hearing: 7/15/2015</p>	Notice of Preparation	County of Los Angeles	SCAQMD staff commented 7/8/2015

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**ATTACHMENT A-2  
INCOMING CEQA DOCUMENTS LOG  
JULY 1, 2015 TO JULY 31, 2015**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<b>Retail</b> <b>LAC150701-05</b> ENV-2013-3815	The proposed project consists of demolishing an approximately 1,001-square-foot restaurant and construction of a new 1,879-square-foot convenience store on an approximately 2,898-square-foot lot. Reference LAC150226-12  Comment Period: N/A Public Hearing: N/A	Response to Comments	City of Los Angeles	Document reviewed - No comments sent
<b>Retail</b> <b>LAC150707-07</b> Legado Mixed-Use Project	The 4.275-acre project site is currently developed with a 110-room, hotel and 28,354 square feet of retail space. The proposed project consists of demolition of all retail space and the construction of a mixed-use (residential/commercial) development and renovation of the existing hotel.  Comment Period: N/A Public Hearing: 7/16/2015	Notice of Public Hearing and Intent to a Adopt MND	City of Redondo Beach	Document reviewed - No comments sent
<b>Retail</b> <b>LAC150709-04</b> ENV-2015-449/ 712-770 S. Grand Ave; Central City	The proposed project consists of a mixed-use development consisting of four restaurants, an 800-square-foot café, and Whole Foods Market on the ground floor within a 50,000-square-foot retail area.  Comment Period: 7/9/2015 - 7/29/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	Document reviewed - No comments sent
<b>Retail</b> <b>LAC150714-09</b> Arclight Cinemas Project	The proposed project consists of demolishing an existing 325-space public parking structure and development of an approximately 100,000 square-foot theater building.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/noparclight.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/noparclight.pdf</a> Comment Period: 7/14/2015 - 8/14/2015 Public Hearing: N/A	Notice of Preparation	City of Santa Monica	SCAQMD staff commented 7/22/2015
<b>Retail</b> <b>ORC150709-06</b> Tentative Parcel Map 2015-127	The proposed project consists of subdividing an existing 22.7-acre vacant parcel to facilitate the development of a shopping/medical center including retail, service retail, restaurants, medical offices and acute care/rehabilitation hospital.  Comment Period: 7/9/2015 - 7/23/2015 Public Hearing: N/A	Initial Project Consultation	City of Tustin	Document does not require comments

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**ATTACHMENT A-2  
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JULY 1, 2015 TO JULY 31, 2015**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<b>Retail</b> <b>RVC150721-03</b> Cal Cruz Express	The proposed project consists of the construction and operation of a new 4,392-square-foot self-service, drive-thru car wash and a 6,166-square-foot tire shop with 1,225-square-foot attached retail tenant space within a 0.80-acre site.  Comment Period: 7/21/2015 - 8/10/2015 Public Hearing: N/A	Initial Project Consultation	City of Menifee	Document reviewed - No comments sent
<b>General Land Use (residential, etc.)</b> <b>LAC150701-01</b> Trabuco Butterfly Garden Park Project	The proposed project consists of providing passive recreational features and amenities, and open space within a linear-shaped site.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/mndbutterfly.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/mndbutterfly.pdf</a> Comment Period: N/A Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Bellflower	SCAQMD staff commented 7/9/2015
<b>General Land Use (residential, etc.)</b> <b>LAC150702-01</b> ENV-2015-1223/ 2500, 2520 W. Wilshire Blvd & 668, 672 S. Coronado St; Westlake	The proposed project consists of the reuse of an existing 13-story commercial building into a mixed-use apartment building with 248 residential units without increasing the footprint.  Comment Period: 7/2/2015 - 7/22/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	Document reviewed - No comments sent
<b>General Land Use (residential, etc.)</b> <b>LAC150702-04</b> ENV-2015/1416/ 9218-9228 W. National Blvd; West Los Angeles	The proposed project consists of demolishing two occupied apartment buildings and the construction, use and maintenance of ten three-story small lot homes.  Comment Period: 7/2/2015 - 8/3/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	Document reviewed - No comments sent
<b>General Land Use (residential, etc.)</b> <b>LAC150702-06</b> ENV-2005-6557/ 1338-1360 S. Roxbury Dr; West Los Angeles	The proposed project consists of the construction of a three-story, 34-unit apartment building above one level of subterranean parking.  Comment Period: 7/2/2015 - 7/22/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	Document reviewed - No comments sent

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**ATTACHMENT A-2  
INCOMING CEQA DOCUMENTS LOG  
JULY 1, 2015 TO JULY 31, 2015**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>General Land Use (residential, etc.)</i> <b>LAC150707-09</b> Mission Place Project	The proposed project consists of developing a 1.27-acre surface parking lot with a three-story, 85,775-square-foot mixed-use project comprising two new buildings. In total, the project proposes 91 multi-family residential units, 7,000 square feet of ground floor commercial space, and 228 parking spaces in three levels of underground parking. <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/nopmissionplace.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/nopmissionplace.pdf</a> Comment Period: 7/2/2015 - 7/31/2015 Public Hearing: N/A	Notice of Preparation	South Pasadena Unified School District	SCAQMD staff commented 7/14/2015
<i>General Land Use (residential, etc.)</i> <b>LAC150709-02</b> ENV-2014-3802/ 820 E. Indiana Ave; Venice	The proposed project consists of allowing the construction, use and maintenance of a new three-story approximately 2,300-square-foot single-family dwelling unit on a 5,281-square-foot lot developed with a one-story single-family dwelling. <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/env20143802.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/env20143802.pdf</a> Comment Period: 7/9/2015 - 8/10/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	SCAQMD staff commented 7/30/2015
<i>General Land Use (residential, etc.)</i> <b>LAC150714-01</b> South Garfield Village Specific Plan	The proposed project consists of a specific plan which provides area-specific land use districts unique to the project area, along with permitted uses and development standards. The project would allow a maximum of approximately 330,000 square feet of neighborhood shopping and commercial services uses within the project area. Comment Period: 7/13/2015 - 8/11/2015 Public Hearing: N/A	Draft Mitigated Negative Declaration	City of Monterey Park	Document reviewed - No comments sent
<i>General Land Use (residential, etc.)</i> <b>LAC150714-02</b> Peafowl Management Plan	The proposed project consists of the adoption of a plan to humanely manage the Peafowl population within the boundaries of the City of Rancho Palos Verdes. Comment Period: 7/14/2015 - 7/27/2015 Public Hearing: N/A	Draft Negative Declaration	City of Rancho Palos Verdes	Document reviewed - No comments sent
<i>General Land Use (residential, etc.)</i> <b>LAC150714-03</b> 140000011	The proposed project consists of the development of residential, commercial, and open space uses on an undeveloped site of approximately 77 acres. The residential component would include a gated community with 67 small lot detached single-family homes and four affordable units. The commercial component would consist of a 66,516-square-foot, 120-room, four-story hotel. Comment Period: 7/14/2015 - 8/24/2015 Public Hearing: N/A	Notice of Availability of a Draft Environmental Impact Report	City of Calabasas	Document reviewed - No comments sent

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INCOMING CEQA DOCUMENTS LOG  
JULY 1, 2015 TO JULY 31, 2015**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>General Land Use (residential, etc.)</i> <b>LAC150723-01</b> ENV-2015-1238/ 1414 N. Stanley Ave; Hollywood	The proposed project consists of the construction, use and maintenance of eight small lot homes.  Comment Period: 7/23/2015 - 8/12/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	Document reviewed - No comments sent
<i>General Land Use (residential, etc.)</i> <b>LAC150723-03</b> ENV-2013-2185/ 535 S. Kingsley Dr; Wilshire	The proposed project consists of constructing an approximately 77,356-square-foot apartment building that contains 72 dwelling units.  Comment Period: 7/23/2015 - 8/12/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	Document reviewed - No comments sent
<i>General Land Use (residential, etc.)</i> <b>LAC150723-04</b> ENV-2014-2355/ 4806 W. Elmwood Ave; Wilshire	The proposed project consists of demolishing an existing single-family dwelling and the construction of a three-story, five-unit residential condominium with 12 subterranean parking spaces.  Comment Period: 7/23/2015 - 8/12/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	Document reviewed - No comments sent
<i>General Land Use (residential, etc.)</i> <b>LAC150723-05</b> ENV-2014-2723/ 907-909 S. Shenandoah St; Wilshire	The proposed project consists of the construction of a four-story, six-unit residential condominium with 15 subterranean parking spaces.  Comment Period: 7/23/2015 - 8/12/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	Document reviewed - No comments sent
<i>General Land Use (residential, etc.)</i> <b>LAC150723-08</b> ENV-2015-687/ 11036 1/2 W. Moorpark St; Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass	The proposed project consists of developing a five-story high residential building with 96 dwelling units on an approximately 57,336-square-foot site.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/mnd2015687.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/mnd2015687.pdf</a> Comment Period: 7/23/2015 - 8/12/2015 Public Hearing: N/A	Notice of Availability of a Draft Mitigated Negative Declaration	City of Los Angeles	SCAQMD staff commented 7/31/2015

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**ATTACHMENT A-2  
INCOMING CEQA DOCUMENTS LOG  
JULY 1, 2015 TO JULY 31, 2015**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>General Land Use (residential, etc.)</i> <b>RVC150702-04</b> GPA No. 1126, CZ No. 7811, TTM No. 36668	The proposed project consists of subdividing 65.20 acres into 200 residential lots, three water quality basins, two park sites and eleven open space lots.  Comment Period: 7/1/2015 - 7/29/2015 Public Hearing: 7/29/2015	Notice of Availability of a Draft Mitigated Negative Declaration	County of Riverside	Under review, may submit written comments
<i>General Land Use (residential, etc.)</i> <b>RVC150722-01</b> Audi of Temecula Development Plan (PA15-0513)	The proposed project consists of a Development Plan application for Hoehn Motors, Inc. to construct an approximately 37,468-square-foot Audi dealership on a 4.5-acre site.  Comment Period: 7/22/2015 - 9/3/2015 Public Hearing: N/A	Draft Supplemental Environmental Impact Report	City of Temecula	Document reviewed - No comments sent
<i>General Land Use (residential, etc.)</i> <b>RVC150722-05</b> Tentative Tract Map No. 36897 and Change of Zone No. 7876	The proposed consists of subdividing 110.1 acres into 103 residential lots, three basin lots, three open space lots, one sewer lot, one lot designated for proposed lift station, and one remainder lot.  Comment Period: 7/22/2015 - 7/30/2015 Public Hearing: N/A	Initial Project Consultation	County of Riverside	Document reviewed - No comments sent
<i>General Land Use (residential, etc.)</i> <b>SBC150721-05</b> EA Review No. 14-75, SPA No. 2 to the Renaissance Specific Plan, Tentative Tract Map No. 19916	The proposed project consists of the subdivision of 5.37 gross acres of the project site into twenty vacant single-family lots, one 0.53-acre lot containing an existing single-family residence, one 1.56-acre remainder vacant lot and two new public streets. The project will also include construction of 20 single family residences.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/august/ttm19916.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/august/ttm19916.pdf</a> Comment Period: 7/17/2015 - 8/5/2015 Public Hearing: 8/26/2015	Draft Mitigated Negative Declaration	City of Rialto	SCAQMD staff commented 8/5/2015

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INCOMING CEQA DOCUMENTS LOG  
JULY 1, 2015 TO JULY 31, 2015**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<b><i>Plans and Regulations</i></b>  <b>SBC150702-11</b> Meditera Specific Plan	The proposed project consists of a master-planned residential community consisting of a maximum of 316 residential units on approximately 179 acres.   Comment Period: N/A	Notice of a Public Hearing	City of Highland	Document reviewed - No comments sent
<b><i>Plans and Regulations</i></b>  <b>SBC150724-02</b> Leal Master Plan	The proposed project consists of the adoption of the Leal Master Plan, a long range-planning document that identifies the general parameters for future development.   Comment Period: 7/23/2015 - 9/7/2015	Draft Environmental Impact Report	City of Eastvale	Under review, may submit written comments

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**ATTACHMENT B-2\***  
**ONGOING ACTIVE PROJECTS FOR WHICH SCAQMD HAS**  
**OR IS CONTINUING TO CONDUCT A CEQA REVIEW**

<u>SCAQMD LOG-IN NUMBER</u>	<u>PROJECT DESCRIPTION</u>	<u>TYPE OF DOC.</u>	<u>LEAD AGENCY</u>	<u>COMMENT STATUS</u>
<p><b><i>Waste and Water-related</i></b></p> <p><b>LAC150630-22</b> Pasadena Non-Potable Water Project</p>	<p>The proposed project consists of construction and operation of a new non-potable water distribution system to deliver water from three local sources. Approximately 700 acre feet per year of non-potable water would be delivered to the Art Center College of Design, Brookside Golf Course, Rose Bowl Stadium and Brookside Park.</p> <p>Comment Period: 6/30/2015 - 8/31/2015                                      Public Hearing: N/A</p>	<p>Notice of Availability of a Draft Environmental Impact Report</p>	<p>City of Pasadena</p>	<p>Under review, may submit written comments</p>
<p><b><i>General Land Use (residential, etc.)</i></b></p> <p><b>LAC150604-06</b> ENV-2013-4029/ 411-439 S. Hamel Rd; Wilshire</p>	<p>The proposed project consists of constructing an 88-unit apartment building in the Wilshire Community Plan Area. The project involves the demolition of five residential buildings, on-site grading and the export of approximately 33,000 cubic yards of excavated materials.</p> <p>Comment Period: 6/4/2015 - 6/24/2015                                      Public Hearing: N/A</p>	<p>Notice of Availability of a Draft Mitigated Negative Declaration</p>	<p>City of Los Angeles</p>	<p>Under review, may submit written comments</p>
<p><b><i>Goods Movement</i></b></p> <p><b>LAC150630-17</b> Berths 167-169 [Shell] Marine Oil Terminal Wharf Improvements Project</p>	<p>The proposed project consists of various seismic and ground improvements to Shell Oil Company's marine oil terminal at Berths 167-169 on Mormon Island that are required in order to comply with the Marine Oil Terminal Engineering and Maintenance Standards.</p> <p><a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/nopberth167-169doc2.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/nopberth167-169doc2.pdf</a></p> <p>Comment Period: 6/30/2015 - 7/31/2015                                      Public Hearing: 7/15/2015</p>	<p>Notice of Preparation</p>	<p>Port of Los Angeles</p>	<p>SCAQMD staff commented 7/8/2015</p>
<p><b><i>Warehouse &amp; Distribution Centers</i></b></p> <p><b>RVC150619-03</b> Moreno Valley Logistics Center (SPA P-15-036, TPM PA 15-0018; PP PA 15-0014, Plot Plan PA15-0015, Plot Plan PA15-016, and Plot Plan PA15-0017)</p>	<p>The proposed project consists of four Plot Plans to provide for the construction and operation of a warehouse distribution center with four buildings providing 1,737,518 square feet of total floor space. Associated improvements to the property would include loading docks, surface parking areas (automobile parking and truck trailer parking), drive aisles, roadway improvements, utility infrastructure, landscaping, exterior lighting, signage, and water quality detention basins. The Project also includes a Specific Plan Amendment to modify land use buffering and landscape requirements applicable to the subject property and a Tentative Parcel Map to consolidate a 73.4 acre portion of the site into two parcels.</p> <p><a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/nopmvlogistics.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/nopmvlogistics.pdf</a></p> <p>Comment Period: 6/19/2015 - 7/17/2015                                      Public Hearing: N/A</p>	<p>Notice of Preparation</p>	<p>City of Moreno Valley</p>	<p>SCAQMD staff commented 7/9/2015</p>

\*Sorted by Comment Status, followed by Land Use, then County, then date received.

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**ATTACHMENT B-2  
ONGOING ACTIVE PROJECTS FOR WHICH SCAQMD HAS  
OR IS CONTINUING TO CONDUCT A CEQA REVIEW**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<p><b><i>Warehouse &amp; Distribution Centers</i></b> <b>SBC150625-09</b> Sierra Lakes Commerce Center Project</p>	<p>The proposed project consists of the construction and operation of approximately 597,818 net square feet of "high-cube" logistics warehouse use with associated office spaces. Reference SBC150306-01</p> <p><a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/august/deirsierra.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/august/deirsierra.pdf</a> Comment Period: 6/25/2015 - 8/10/2015 Public Hearing: N/A</p>	Draft Environmental Impact Report	City of Fontana	SCAQMD staff commented 8/6/2015
<p><b><i>Industrial and Commercial</i></b> <b>RVC150625-11</b> Nichols Canyon Mine Expansion Project</p>	<p>The proposed project consists of amending an existing reclamation plan in order to increase mining activities by approximately 24 acres; reduce the annual tonnage limit for the mine from 4,000,000 tons per day to 1,000,000 tons per day; revise the approved seed mix and revegetation plan; and extend the hours permitted for mining.</p> <p><a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/nopnichols.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/nopnichols.pdf</a> Comment Period: 6/25/2015 - 7/27/2015 Public Hearing: N/A</p>	Notice of Preparation	City of Lake Elsinore	SCAQMD staff commented 7/7/2015
<p><b><i>Industrial and Commercial</i></b> <b>RVC150630-13</b> Temecula Gateway</p>	<p>The proposed project consists of construction of four commercial buildings totaling approximately 19,669 square feet.</p> <p><a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/noptemegate.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/noptemegate.pdf</a> Comment Period: 6/30/2015 - 7/29/2015 Public Hearing: 7/22/2015</p>	Notice of Preparation	City of Temecula	SCAQMD staff commented 7/1/2015
<p><b><i>Industrial and Commercial</i></b> <b>SBC150626-01</b> Holiday Rock's Northwest Upland Operations CUP 93-02, Modification #2</p>	<p>The proposed project consists of a request to modify an existing 114 acre Mine and Reclamation Plan to incorporate 64 acres of an adjacent former mine site that was recently purchased to create one plan on 178 acres to comply with state law.</p> <p><a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/mndholiday.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/mndholiday.pdf</a> Comment Period: 6/4/2015 - 7/3/2015 Public Hearing: N/A</p>	Draft Mitigated Negative Declaration	City of Upland	SCAQMD staff commented 7/28/2015
<p><b><i>Waste and Water-related</i></b> <b>ORC150630-10</b> Orange County Water District Mid Basin Centennial Park Injection Wells Project</p>	<p>The proposed project consists of the construction and operation of four underground injection wells at Centennial Park and the construction and operation of a monitoring well at Heritage Museum. Reference: ORC150623-09</p> <p><a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/rvsdnopocwdwater.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/rvsdnopocwdwater.pdf</a> Comment Period: 7/7/2015 - 8/6/2015 Public Hearing: N/A</p>	Recirculated Notice of Preparation	Orange County Water District	SCAQMD staff commented 7/1/2015

# - Project has potential environmental justice concerns due to the nature and/or location of the project.







**ATTACHMENT B-2  
ONGOING ACTIVE PROJECTS FOR WHICH SCAQMD HAS  
OR IS CONTINUING TO CONDUCT A CEQA REVIEW**

<u>SCAQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i><b>Plans and Regulations</b></i>  <b>RVC150630-15</b> GPA No. 1120	The proposed project consists of the Riverside County 2013-2021 Housing Element update.  <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/nopgpa1120.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/nopgpa1120.pdf</a> Comment Period: 6/30/2015 - 8/17/2015 Public Hearing: 8/10/2015	Notice of Preparation	Riverside County	SCAQMD staff commented 7/1/2015
<i><b>Plans and Regulations</b></i>  <b>SBC150630-16</b> Valley Corridor Specific Plan	The proposed project consists of the Valley Corridor Specific Plan that would provide the foundation for a more vibrant community corridor that offers employment and retail opportunities surrounded by more walkable safe and attractive environment. Build out of the Valley Corridor Specific plan could ultimately support a total of 1,093 residential dwelling units, 4,073 residents, 1,882,428 square feet of nonresidential buildings space, and 1,890 jobs in the plan area. <a href="http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/nopvalleycorr.pdf">http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/july/nopvalleycorr.pdf</a> Comment Period: 6/29/2015 - 7/28/2015 Public Hearing: 7/15/2015	Notice of Preparation	San Bernardino County Land Use Services Department	SCAQMD staff commented 7/1/2015

# - Project has potential environmental justice concerns due to the nature and/or location of the project.



**ATTACHMENT C-2  
ACTIVE SCAQMD LEAD AGENCY PROJECTS  
THROUGH JULY 31, 2015**

PROJECT DESCRIPTION	PROPONENT	TYPE OF DOCUMENT	STATUS	CONSULTANT
The Phillips 66 (formerly ConocoPhillips) Los Angeles Refinery Ultra Low Sulfur Diesel project was originally proposed to comply with federal, state and SCAQMD requirements to limit the sulfur content of diesel fuels. Litigation against the CEQA document was filed. Ultimately, the California Supreme Court concluded that the SCAQMD had used an inappropriate baseline and directed the SCAQMD to prepare an EIR, even though the project has been built and has been in operation since 2006. The purpose of this CEQA document is to comply with the Supreme Court's direction to prepare an EIR.	Phillips 66 (formerly ConocoPhillips), Los Angeles Refinery	Environmental Impact Report (EIR)	The Notice of Preparation/ Initial Study (NOP/IS) was circulated for a 30-day public comment period on March 26, 2012 to April 26, 2012. The consultant submitted the administrative Draft EIR to SCAQMD in late July 2013. The Draft EIR was circulated for a 45-day public review and comment period from September 30, 2014 to November 13, 2014. Two comment letters were received and responses to comments are being prepared.	Environmental Audit, Inc.
Tesoro Refinery proposes to integrate the Tesoro Wilmington Operations with the Tesoro Carson Operations (former BP Refinery). The proposed project also includes modifications of storage tanks at both facilities, new interconnecting pipelines, and new electrical connections. In addition, Carson's Liquid Gas Rail Unloading facilities will be modified. The proposed project will be designed to comply with the federally mandated Tier 3 gasoline specifications and with State and local regulations mandating emission reductions.	Tesoro Refining and Marketing Company Los Angeles Refinery	Environmental Impact Report (EIR)	A previous Draft Negative Declaration was withdrawn in order for the storage tank project to be analyzed in a new CEQA document that also addresses the Tesoro-BP Refinery Integration Project. A NOP/IS was prepared for the integration project and released for a 30-day public review and comment period from September 10, 2014 to October 10, 2014. 86 comment letters were received, and responses to comments are being prepared. The consultant is preparing a Draft EIR.	Environmental Audit, Inc.
Quemetco is proposing an increase in the daily furnace feed rate.	Quemetco	Environmental Impact Report (EIR)	An Initial Study has been prepared by the consultant and is under review by SCAQMD staff.	Trinity Consultants
Chevron is proposing modifications to its Product Reliability and Optimization (PRO) Project and has applied for a modification to its permit to increase the firing duty of its Tail Gas Unit to meet current BACT requirements.	Chevron	Addendum	An addendum to the 2008 Final EIR has been prepared by the consultant. Staff has reviewed the Addendum and provided edits to the consultant. Staff is reviewing responses to comments on the permit applications.	Environmental Audit, Inc.

A shaded row indicates a new project.

**ATTACHMENT C-2  
ACTIVE SCAQMD LEAD AGENCY PROJECTS  
THROUGH JULY 31, 2015**

PROJECT DESCRIPTION	PROPONENT	TYPE OF DOCUMENT	STATUS	CONSULTANT
Breitburn Operating LP is proposing to upgrade their fluid handling systems to facilitate an increase in the amount of produced water that can be treated at the site in Sante Fe Springs.	Breitburn Operating LP	Environmental Impact Report (EIR)	The NOP/IS was released for a 30-day public review and comment period from December 4, 2014 to January 2, 2015. Two comment letters were received related to the NOP/IS and responses are being prepared. The Draft EIR was released for 45-day public review and comment period from April 15, 2015 to May 29, 2015. Two comment letters were received relative to the Draft EIR. Responses to the comments have been prepared and provided to the Department of Conservation, Division of Oil, Gas and Geothermal Resources.	Environ
DCOR LLC is proposing to install three flares on their off-shore oil Platform Esther.	DCOR LLC	Mitigated Negative Declaration	A preliminary draft Mitigated Negative Declaration has been prepared by the consultant and is under review by SCAQMD staff.	RBF Consulting

A shaded row indicates a new project.

[↑ Back to Agenda](#)

BOARD MEETING DATE: September 4, 2015

AGENDA NO. 24

REPORT: Rule and Control Measure Forecast

SYNOPSIS: This report highlights SCAQMD rulemaking activities and public workshops potentially scheduled for the year 2015 and portions of 2016.

COMMITTEE: No Committee Review

RECOMMENDED ACTION:  
Receive and file.

Barry R. Wallerstein, D.Env.  
Executive Officer

PF:JW:AFM:cg

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1110.2	Emissions from Gaseous and Liquid-Fueled Engines
Rule 1110.2 is moved from October to November to allow staff additional time to work with stakeholders.	
1304.2	Greenfield or Existing Electrical Generating Facility Fee for Use of Offsets for Load Serving Entities
Proposed Rule 1304.2 is moved from November to January 2016 to allow staff additional time to work with stakeholders.	
1304.3	Greenfield or Existing Electrical Generating Facility Fee for Use of Offsets for Municipalities
Proposed Rule 1304.3 is moved from November to January 2016 to allow staff additional time to work with stakeholders.	
1402	Control of Toxic Air Contaminants from Existing Sources
Rule 1402 is moved from November to January 2016 to allow staff additional time to work with stakeholders.	
1420	Emissions Standard for Lead
Rule 1420 is moved from December to May 2016 to allow staff additional time to analyze data, work on the rule proposal, and work with stakeholders.	

1430.1	Control of Toxic Air Contaminants from Grinding Operations at Forging Facilities
Proposed Rule 1430.1 is moved from October to March 2016 to allow staff additional time to work on the rule proposal and work with stakeholders.	
Reg. XX	Regional Clean Air Incentives Market (RECLAIM (CMB-01))
Regulation XX is moved from October to November to allow staff additional time to work with stakeholders.	

## 2015 MASTER CALENDAR

Below is a list of all rulemaking activity scheduled for the year 2015. The last four columns refer to the type of rule adoption or amendment. A more detailed description of the proposed rule adoption or amendment is located in the Attachments (A through D) under the type of rule adoption or amendment (i.e. AQMP, Toxics, Other and Climate Change).

*\*An asterisk indicates that the rulemaking is a potentially significant hearing.*

*+This proposed rule will reduce criteria air contaminants and assist toward attainment of ambient air quality standards.*

*<sup>1</sup>Subject to Board approval*

*California Environmental Quality Act shall be referred to as "CEQA."*

*Socioeconomic Analysis shall be referred to as "Socio."*

### 2015

October		AQMP	Toxics	Other	Climate Change
415	Odors from Rendering Facilities			√	
1420.2	Emissions Standard for Lead from Metal Melting Operations		√		
1106	Marine Coating Operations			√	
1106.1	Pleasure Craft Coating Operations			√	
November					
219	Equipment Not Requiring a Written Permit Pursuant to Regulation II			√	
1110.2 <sup>1</sup>	Emissions from Gaseous and Liquid-Fueled Engines			√	
1113* <sup>+</sup>	Architectural Coatings (CTS-01)	√			
Reg. XX* <sup>+1</sup>	Regional Clean Air Incentives Market (RECLAIM) (CMB-01)	√			
December		AQMP	Toxics	Other	Climate Change
416	Odors from Kitchen Grease Processing			√	
1118	Control of Emissions from Refinery Flares			√	√
1123 <sup>+</sup>	Refinery Process Turnarounds (MCS-03)	√			
1466	Toxic Air Contaminant Emissions from Decontamination of Soil		√		

## 2015 MASTER CALENDAR (continued)

December	(continued)				
1171 <sup>+</sup>	Solvent Cleaning Operations (CTS-02)	√			
1177 <sup>+</sup>	Liquefied Petroleum Gas Transfer and Dispensing (FUG-02)	√			
4001*	Backstop to Ensure AQMP Emission Reduction Targets Are Met at Commercial Marine Ports (IND-01)	√			

## 2015 TO-BE DETERMINED

TBD		AQMP	Toxics	Other	Climate Change
222	Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation I			√	
224	Incentives for Super-Compliant Technologies			√	
1107	Coating of Metal Parts and Products (CTS-02)			√	
1147	NOx Reductions from Miscellaneous Sources			√	
1168	Adhesive and Sealant Applications (CTS-02)	√			
1190 Series	Fleet Vehicle Requirements			√	
Reg. XIII	New Source Review			√	
1403	Asbestos Emissions from Demolition/Renovation Activities		√		
1411	Recovery of Recycling of Refrigerants from Motor Vehicle Air Conditioners		√		
1902	Transportation Conformity – Preamble			√	
2511	Credit Generation Program for Locomotive Head End Power Unit Engines			√	
2512	Credit Generation Program for Ocean-Going Vessels at Berth			√	

**2015 MASTER CALENDAR (continued)**

**2015 TO-BE DETERMINED**

<b>TBD</b>	<b>(continued)</b>	<b>AQMP</b>	<b>Toxics</b>	<b>Other</b>	<b>Climate Change</b>
Reg. XXVII	Climate Change				√
Reg. IV, IX, X, XI, XIV, XX XXX and XXXV Rules	Various rule amendments may be needed to meet the requirements of state and federal laws, implement OEHHA revised risk assessment guidance, address variance issues/ technology-forcing limits, to abate a substantial endangerment to public health or welfare, or to seek additional reductions to meet the SIP short-term measure commitment. The associated rule development or amendments include, but are not limited to, SCAQMD existing rules listed in Table 1 of the December 5, 2014 Rule and Control Measure Forecast and new or amended rules to implement the 2012 AQMP measures in Table 2 of the December 5, 2014 Rule and Control Measure Forecast. The CCP has been updated to include new measures to address toxic emissions in the basin. The CCP includes a variety of measures that will reduce exposure to air toxics from stationary, mobile, and area sources (Table 3 of the December 5, 2014 Rule and Control Measure Forecast). Rule amendments may include updates to provide consistency with CARB Statewide Air Toxic Control Measures.	√	√	√	√
---	Mobile Source Measures	√	√		
---	SIP Implementation	√			

**2015 MASTER CALENDAR (continued)**

**2016**

<b>January</b>		<b>AQMP</b>	<b>Toxics</b>	<b>Other</b>	<b>Climate Change</b>
1161 <sup>+</sup>	VOC Reductions from Mold Release Agents (CTS-03)	√			
1188 <sup>+</sup>	VOC Reductions from Vacuum Trucks (FUG-01)	√			
1304.2* <sup>1</sup>	Greenfield or Existing Electrical Generating Facility Fee for Use of Offsets for Load Serving Entities			√	
1304.3* <sup>1</sup>	Greenfield or Existing Electrical Generating Facility Fee for Use of Offsets for Municipalities			√	
1402 <sup>1</sup>	Control of Toxic Air Contaminants from Existing Sources		√		
2301 <sup>+</sup>	Control of Emissions from New or Redevelopment Projects (EGM-01)	√			
<b>February</b>					
1136	Wood Products Coatings (CTS-02)			√	
1450	Control of Methylene Chloride Emissions		√		
<b>March</b>					
1430.1 <sup>1</sup>	Control of Toxic Air Contaminants from Metal Forging, Shredding, Grinding and Other Metal Processing Operations		√		
<b>May</b>					
1420 <sup>+</sup>	Emissions Standard for Lead		√		



# ATTACHMENT A

## AQMP Rule Activity Schedule

This attachment lists those control measures that are being developed into rules or rule amendments for Board consideration that are designed to implement the amendments to the 2012 Air Quality Management Plan.

### 2015

<b>November</b>	
1113* <sup>+</sup>	<p><b>Architectural Coatings (CTS-01)</b>  <i>[Projected Emission Reduction: N/A]</i>                      Potential amendments may include a backstop provision to address additional potential VOC emission reductions from the small container exemption, high volume categories, and increased fees in Rule 314 – Fees for Architectural Coatings. Additional clarifications will also be considered to address ongoing compliance issues.  <i>Philip Fine 909.396.2239 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
Reg. XX* <sup>+1</sup>	<p><b>Regional Clean Air Incentives Market (RECLAIM) (CMB-01)</b>  <i>[Projected Emission Reduction: 3-5 TPD]</i>                      Proposed amendments to Regulation XX will seek to implement additional NOx emission reductions.  <i>Joe Cassmassi 909.396.3155 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
<b>December</b>	
1123 <sup>+</sup>	<p><b>Refinery Process Turnarounds (MCS-03)</b>  <i>[Projected Emission Reduction: N/A]</i>                      Proposed amendments, if needed, will implement Control Measure MSC-03 of the 2007 AQMP by establishing procedures that better quantify emission impacts from start-up, shutdown or turnaround activities.  <i>Susan Nakamura 909.396.3105 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
1171 <sup>+</sup>	<p><b>Solvent Cleaning Operations (CTS-02)</b>  <i>[Projected Emission Reduction: Some VOC]</i>                      The proposed amendments will review existing exemptions and include clarifications that may arise due to compliance verification activities or manufacturer and public input, including the sales prohibition clause.  <i>Philip Fine 909.396.2239 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
1177 <sup>+</sup>	<p><b>Liquefied Petroleum Gas Transfer and Dispensing (FUG-02)</b>  <i>[Projected Emission Reduction: N/A]</i>                      Potential amendments may be proposed to include additional sources of emissions from the dispensing and transfer of LPG.  <i>Susan Nakamura 909.396.3105 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>

# ATTACHMENT A

## AQMP Rule Activity Schedule (continued)

**2015**

December	(continued)
4001*	<p><b>Backstop to Ensure AQMP Emission Reduction Targets Are Met at Commercial Marine Ports (IND-01)</b>  <i>[Projected Emission Reduction: TBD]</i>                      If triggered, the proposed rule will address cost-effective NO<sub>x</sub>, SO<sub>x</sub>, and PM<sub>2.5</sub> emission reduction strategies from port-related sources to ensure emission reductions claimed or emission targets assumed in the 2012 AQMP for the 24-hour PM<sub>2.5</sub> standard are maintained.  <i>Randall Pasek 909.396.2251 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>

### To-Be Determined 2015

To-Be Determined	
1168	<p><b>Adhesive and Sealant Applications (CTS-02)</b>  <i>[Projected Emission Reduction: N/A]</i>                      Amendments to Rule 1168 will partially implement CTS-02 and reflect improvements in adhesive and sealant technology, as well as remove outdated provisions and include minor clarifications.  <i>Philip Fine 909.396.2239 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
Reg. IV, IX, X, XI, XIV, XIV, XX, XXX AND XXXV Rules	<p>Various rule amendments may be needed to meet the requirements of state and federal laws, implement OEHHA revised risk assessment guidance, address variance issues/ technology-forcing limits, to abate a substantial endangerment to public health or welfare, or to seek additional reductions to meet the SIP short-term measure commitments and/or long-term emission reduction commitments. The associated rule development or amendments include, but are not limited to, SCAQMD existing rules listed in Table 1 of the December 5, 2014 Rule and Control Measure Forecast and new or amended rules to implement the 2012 AQMP measures in Table 2 of the December 5, 2014 Rule and Control Measure Forecast.</p>

# ATTACHMENT A

## AQMP Rule Activity Schedule (continued)

### To-Be Determined 2015

To-Be Determined	(continued)
---	<p><b>Mobile Source Measures</b>  <i>[Projected Emission Reduction: TBD]</i>                      The District may adopt measures to limit emissions from mobile sources, both on-road and off-road (nonroad) sources, consistent with the Board’s direction to counsel at the October 2014 meeting to explore the District’s regulatory authority over mobile sources. These measures may include but are not limited to, transportation control measures, operational limits, fleet rules, credit generation rules, and indirect source rules, such as an indirect source rule for railyards and/or other sources which attract mobile sources.  <i>Henry Hogo 909.396.3184 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
---	<p><b>SIP Implementation</b>  <i>[Projected Emission Reduction: TBD]</i>                      The District may adopt additional measures to carry out the State Implementation Plan for PM2.5 or ozone, or other pollutants if required, as deemed necessary to meet commitments and federal requirements.  <i>Philip Fine 909.396.2239 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>

### 2016

January	
1161 <sup>+</sup>	<p><b>VOC Reductions from Mold Release Agents (CTS-03)</b>  <i>[Projected Emission Reduction: TBD]</i>                      The proposed rule will establish requirements for mold release products used in composite, fiberglass, metal and plastic manufacturing, and concrete stamping operations.  <i>Philip Fine 909.396.2239 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
1188 <sup>+</sup>	<p><b>VOC Reductions from Vacuum Trucks (FUG-01)</b>  <i>[Projected Emission Reduction: TBD]</i>                      The proposed rule will establish VOC emission standards and other requirements associated with the operation of vacuum trucks not covered by Rule 1149 – Storage Tank and Pipeline Cleaning and Degassing.  <i>Susan Nakamura 909.396.3105 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>

# ATTACHMENT A

## AQMP Rule Activity Schedule (continued)

2016

January	(continued)
2301 <sup>+</sup>	<p><b>Control of Emissions from New or Redevelopment Projects (EGM-01)</b> <i>[Projected Emission Reduction: Committed to reduce 0.5 tons per day of VOC, 0.8 tons per day of NOx, and 0.5 tons per day of PM2.5 in 2023.]</i></p> <p>The proposed rule will implement AQMP Control Measure EGM-01 – Emission Reductions from New or Redevelopment Projects. Proposed Rule 2301 will consider the co-benefits of VOC, NOx, and PM 2.5 emission reductions from the 2012 Regional Transportation Plan/Sustainable Communities Strategy and San Joaquin Valley Air Pollution Control District’s Rule 9510 – Indirect Source Review to meet the “all feasible measures” requirement.</p> <p><i>Henry Hogo 909.396.3184 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>

## ATTACHMENT B

### Toxics Rule Activity Schedule

This attachment lists those rules or rule amendments for Board consideration that are designed to implement the Air Toxics Control Plan.

### 2015

October	
1420.2*	<p><b>Emissions Standard for Lead from Metal Melting Operations</b>  <i>[Projected Emission Reduction: TBD]</i>                      In October 2008, U.S. EPA lowered the National Ambient Air Quality Standard (NAAQS) for lead from 1.5 to 0.15 ug/m3. Proposed Rule 1420.2 will establish requirements for medium lead emitting sources to ensure compliance with the lead NAAQS.  <i>Susan Nakamura 909.396.3105 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
December	
1466	<p><b>Toxic Air Contaminant Emissions from Decontamination of Soil</b>  <i>[Projected Emission Reduction: TBD]</i>                      Proposed Rule 1466 would establish requirements to control toxic metal emissions from activities involving storing, handling and transporting soils with toxic metals. This was previously listed as amendments to Rule 1166.  <i>Susan Nakamura 909.396.3105 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>

### To-Be Determined 2015

To-Be Determined	
1403	<p><b>Asbestos Emissions from Demolition/Renovation Activities</b>  <i>[Projected Emission Reduction: N/A]</i>                      Amendments to Rule 1403 will include specific requirements when conducting asbestos emitting demolition/renovation activities at schools, daycares, and possibly establishments that have sensitive populations. Amendments may include other provisions to improve the implementation of the rule.  <i>Susan Nakamura 909.396.3105 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
1411	<p><b>Recovery of Recycling of Refrigerants from Motor Vehicle Air Conditioners</b>  <i>[Projected Emission Reduction: TBD]</i>                      The proposed amendments to Rule 1411 will align with existing Clean Air Act requirements to minimize the release of refrigerants during the servicing of motor vehicle air conditioning, incorporate other clarifications and enhance enforceability.  <i>Philip Fine 909.396.2239 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>

## ATTACHMENT B

### Toxics Rule Activity Schedule (continued)

#### To-Be Determined 2015

<b>To-Be Determined</b>	<b>(continued)</b>
Reg. IV, IX, X, XI, XIV, XIV, XX, XXX and XXXV Rules	The Clean Communities Plan has been updated to include new measures to address toxic emissions in the basin. The CCP includes a variety of measures that will reduce exposure to air toxics from stationary, mobile, and area sources (Table 3 of the December 5, 2014 Rule and Control Measure Forecast). Rule amendments may include updates to provide consistency with CARB Statewide Air Toxic Control Measures.
---	<p><b>Mobile Source Measures</b>  <i>[Projected Emission Reduction: TBD]</i></p> <p>The District may adopt measures to limit emissions from mobile sources, both on-road and off-road (nonroad) sources, consistent with the Board's direction to counsel at the October 2014 meeting to explore the District's regulatory authority over mobile sources. These measures may include but are not limited to, transportation control measures, operational limits, fleet rules, credit generation rules, and indirect source rules, such as an indirect source rule for railyards and/or other sources which attract mobile sources.</p> <p><i>Henry Hogo 909.396.3184 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>

#### 2016

<b>January</b>	
1402 <sup>1</sup>	<p><b>Control of Toxic Air Contaminants from Existing Sources</b>  <i>[Projected Emission Reduction: TBD]</i></p> <p>Amendments to Rule 1402 will address revised toxic air contaminant risk guidance that has been approved by OEHHA.</p> <p><i>Susan Nakamura 909.396.3105 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
<b>February</b>	
1450	<p><b>Control of Methylene Chloride Emissions</b>  <i>[Projected Emission Reduction: N/A]</i></p> <p>Proposed Rule 1450 will establish requirements to control methylene chloride from furniture stripping operations and other sources.</p> <p><i>Susan Nakamura 909.396.3105 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>

## ATTACHMENT B

### Toxics Rule Activity Schedule (continued)

**2016**

<b>March</b>	
1430	<p><b>Control of Toxic Air Contaminants from Metal Forging, Shredding, Grinding and Other Metal Processing Operations</b>  <i>[Projected Emission Reduction: TBD]</i>                      Proposed Rule 1430 will establish emission reduction requirements to control toxic emissions from grinding operations.  <i>Susan Nakamura 909.396.3105 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
1430.1 <sup>*1</sup>	<p><b>Control of Toxic Air Contaminants from Grinding Operations at Forging Facilities</b>  <i>[Projected Emission Reduction: TBD]</i>                      Proposed Rule 1430.1 will establish emission reduction requirements to control toxic emissions from grinding operations at forging facilities.  <i>Susan Nakamura 909.396.3105 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
<b>May</b>	
1420 <sup>+</sup>	<p><b>Emissions Standard for Lead</b>  <i>[Projected Emission Reduction: TBD]</i>                      In October 2008, U.S. EPA lowered the National Ambient Air Quality Standard (NAAQS) for lead from 1.5 to 0.15 ug/m<sup>3</sup>. Proposed Rule 1420 will establish requirements for smaller lead emitting sources that are not covered under Rules 1420.1 and Rule 1420.2 to ensure compliance with the lead NAAQS.  <i>Susan Nakamura 909.396.3105 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>

# ATTACHMENT C

## Other Rule Activity Schedule

This attachments lists rules or rule amendments for Board consideration that are designed to improve rule enforceability, SIP corrections, or implementing state or federal regulations.

**2015**

<b>October</b>	
<p>1106 1106.1</p>	<p><b>Marine Coating Operations</b> <b>Pleasure Craft Coating Operations</b> <i>[Projected Emission Reduction: N/A]</i> The proposed amendments will include any clarifications that may arise due to the compliance verification activities or manufacturer and public input, including the sales prohibition clause. <i>Philip Fine 909.396.2239 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
<b>November</b>	
<p>219</p>	<p><b>Equipment Not Requiring a Written Permit Pursuant to Regulation II</b> <i>[Projected Emission Reduction: N/A]</i> Amendments to Rule 219 may be proposed to exclude equipment with de minimis emissions from the requirement to obtain written permits. <i>Tracy Goss 909.396.3106 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
<p>1110.2<sup>1</sup></p>	<p><b>Emissions from Gaseous- and Liquid-Fueled Engines</b> <i>[Projected Emission Reduction: N/A]</i> The proposed amendments to Rule 1110.2 would potentially extend the compliance date for biogas used to fuel power generators at landfills and municipal waste facilities. The amendment would result in delayed emission reductions. <i>Joe Cassmassi 909.396.3155 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
<b>December</b>	
<p>416</p>	<p><b>Odors from Kitchen Grease Processing</b> <i>[Projected Emission Reduction: TBD]</i> Proposed Rule 416 will provide protection to the public from odors created during kitchen grease processing operations. The proposed rule will establish Best Management Practices to address odors created during delivery and processing of trap grease to affected facilities. In addition, the proposed rule will examine enclosure for wastewater treatment operations and filter cake storage. The proposed rule may also contain requirements for an Odor Mitigation Plan for continuing odor issues at facilities subject to the rule. <i>Tracy Goss 909.396.3106 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>



# ATTACHMENT C

## Other Rule Activity (continued)

**2015**

December	(continued)
1118	<p><b>Control of Emissions from Refinery Flares</b>  <i>[Projected Emission Reduction: TBD]</i>                      Amendments may be necessary to address results of the additional analysis required by the adopting resolution for the last amendment. Amendments may also be necessary to implement an AB 32 measure.  <i>Susan Nakamura 909.396.3105 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>

## To-Be Determined 2015

To-Be Determined	
222	<p><b>Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation I</b>  <i>[Projected Emission Reduction: N/A]</i>                      Amendments to Rule 222 may be proposed to add additional equipment categories to the streamlined filing/registration program of Rule 222.  <i>Philip Fine 909.396.2239 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
224	<p><b>Incentives for Super-Compliant Technologies</b>  <i>[Projected Emission Reduction: TBD]</i>                      This proposed rule will outline strategies and requirements to incentivize the development, establishment and use of super-compliant technologies. It may be considered as a part of Rule 219 amendments or proposed as a separate incentive rule.  <i>Philip Fine 909.396.2239 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
1107	<p><b>Coating of Metal Parts and Products</b>  <i>[Projected Emission Reduction: N/A]</i>                      Potential amendments to Rule 1107 would further reduce VOC emissions and improve rule clarity and enforceability.  <i>Philip Fine 909.396.2239 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
1147	<p><b>NOx Reductions from Miscellaneous Sources</b>  <i>[Projected Emission Reduction: N/A]</i>                      Amendments may be necessary to address findings of ongoing technology assessment.  <i>Joe Cassmassi 909.396.3155 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>

# ATTACHMENT C

## Other Rule Activity (continued)

### To-Be Determined 2015

<b>To-Be Determined</b>	<b>(continued)</b>
1190 Series	<p><b>Fleet Vehicle Requirements</b>  <i>[Projected Emission Reduction: TBD]</i>                      Amendments to Rule 1190 series fleet rules may be necessary to address remaining outstanding implementation issues and in the event the court's future action requires amendments. In addition, the current fleet rules may be expanded to achieve additional air quality and air toxic benefits.  <i>Dean Saito 909.396.2647 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
Reg. XIII	<p><b>New Source Review</b>  <i>[Projected Emission Reduction: TBD]</i>                      Amendments may be necessary to address U.S. EPA comments on SIP approvability issues and/or requirements. Amendments may also be proposed for clarity and improved enforceability.  <i>Tracy Goss 909.396.3106 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
1902	<p><b>Transportation Conformity</b>  <i>[Projected Emission Reduction: TBD]</i>                      Amendments to Rule 1902 may be necessary to bring the District's Transportation Conformity rule in line with current U.S. EPA requirements.  <i>Susan Nakamura 909.396.3105 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
2511	<p><b>Credit Generation Program for Locomotive Head End Power Unit Engines</b>  <i>[Projected Emission Reduction: TBD]</i>                      Develop a rule to allow generation of PM mobile source emission reduction credits from Locomotive Head End Power Unit Engines. Credits will be generated by retrofitting engines with PM controls or replacing the engines with new lower-emitting engines.  <i>Randall Pasek 909.396.2251 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
2512	<p><b>Credit Generation Program for Ocean-Going Vessels at Berth</b>  <i>[Projected Emission Reduction: TBD]</i>                      Develop a rule to allow generation of PM, NOx and SOx emission reduction credits from ocean-going vessels while at berth. Credits will be generated by controlling the emissions from auxiliary engines and boilers of ships while docked.  <i>Randall Pasek 909.396.2251 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>

## ATTACHMENT C

### Other Rule Activity Schedule

This attachments lists rules or rule amendments for Board consideration that are designed to improve rule enforceability, SIP corrections, or implementing state or federal regulations.

#### To-Be Determined 2015

To-Be Determined	(continued)
Reg. IV, IX, X, XI, XIV, XX, XXX AND XXXV Rules	<p>Various rule amendments may be needed to meet the requirements of state and federal laws, implement OEHHA revised risk assessment guidance, address variance issues/ technology-forcing limits, to abate a substantial endangerment to public health or welfare, or to seek additional reductions to meet the SIP short-term measure commitment. The associated rule development or amendments include, but are not limited to, SCAQMD existing rules listed in Table 1 of the December 5, 2014 Rule and Control Measure Forecast and new or amended rules to implement the 2012 AQMP measures in Table 2 of the December 5, 2014 Rule and Control Measure Forecast. The CCP has been updated to include new measures to address toxic emissions in the basin. The CCP includes a variety of measures that will reduce exposure to air toxics from stationary, mobile, and area sources (Table 3 of the December 5, 2014 Rule and Control Measure Forecast). Rule amendments may include updates to provide consistency with CARB Statewide Air Toxic Control Measures.</p>

#### 2016

January	
1304.2* <sup>1</sup>	<p><b>Greenfield or Existing Electrical Generating Facility Fee for Use of Offsets for Load Serving Entities</b>  <i>[Projected Emission Reduction: TBD]</i>                      Proposed Rule 1304.2 would provide for new, greenfield or additions at existing electrical generating facilities to access the SCAQMD’s internal offset account, subject to qualifying conditions, eligibility, and the payment of a fee to invest in air quality improvement projects consistent with the AQMP. This rule is a companion to Rule 1304.1 and will provide offsets so that new, proposed and other existing electrical generating facilities can compete on a level playing field with existing generating facilities with utility steam boilers, and implement the State’s plan to maintain grid reliability.  <i>Tracy Goss 909.396.3106 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>

# ATTACHMENT C

## Other Rule Activity (continued)

2016

January	(continued)
1304.3* <sup>1</sup>	<p><b>Greenfield or Existing Electrical Generating Facility Fee for Use of Offsets for Municipalities</b>  <i>[Projected Emission Reduction: TBD]</i>                      Proposed Rule 1304.3 would provide for new, greenfield or additions at existing electrical generating facilities to access the SCAQMD’s internal offset account, subject to qualifying conditions, eligibility, and the payment of a fee to invest in air quality improvement projects consistent with the AQMP. This rule is a companion to Rule 1304.1 and will provide offsets so that new, proposed and other existing electrical generating facilities run by local municipalities can meet the electricity reliability needs of their customers.  <i>Tracy Goss 909.396.3106 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
February	
1136	<p><b>Wood Products Coatings</b>  <i>[Projected Emission Reduction: TBD]</i>                      The proposed amendments will include clarifications that may arise due to compliance verification activities or manufacturer and public input, including the sales prohibition clause.  <i>Philip Fine 909.396.2239 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>

**ATTACHMENT D**  
**Climate Change**

This attachments lists rules or rule amendments for Board consideration that are designed to implement SCAQMD’s Climate Change Policy or for consistency with state or federal rules.

**To-Be Determined 2015**

<b>To-Be Determined</b>	
Reg. XXVII	<p><b>Climate Change</b>  <i>[Projected Emission Reduction: TBD]</i>            Additional protocols may be added to Rules 2701 and 2702 and amendments to existing rules may be needed to address implementation issues.  <i>Susan Nakamura 909.396.3105 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>
Reg. IV, IX, X, XI, XIV, XX, XXX and XXXV Rules	<p>Rule developments/amendments may be needed to meet the requirements of state and federal laws related to climate change air pollutants.</p>

**2016**

<b>February</b>	
1118	<p><b>Control of Emissions from Refinery Flares</b>  <i>[Projected Emission Reduction: TBD]</i>            Amendments may be necessary to address findings from the additional analysis required by the adopting resolution for the last amendment.            Amendments may also be necessary to implement an AB 32 measure.  <i>Susan Nakamura 909.396.3105 CEQA: MacMillan 909.396.3244 Socio: Cassmassi 909.396.3155</i></p>

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BOARD MEETING DATE: September 4, 2015

AGENDA NO. 25

**PROPOSAL:** Status Report on Major Projects for Information Management  
Scheduled to Start During First Six Months of FY 2015-16

**SYNOPSIS:** Information Management is responsible for data systems management services in support of all SCAQMD operations. This action is to provide the monthly status report on major automation contracts and projects to be initiated by Information Management during the first six months of FY 2015-16.

**COMMITTEE:** No Committee Review

**RECOMMENDED ACTION:**  
Receive and file.

Barry R. Wallerstein, D.Env.  
Executive Officer

JCM:MAH:OSM:nv

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### **Background**

Information Management (IM) provides a wide range of information systems and services in support of all SCAQMD operations. IM's primary goal is to provide automated tools and systems to implement Board-approved rules and regulations, and to improve internal efficiencies. The annual Budget specifies projects planned during the fiscal year to develop, acquire, enhance, or maintain mission-critical information systems.

### **Summary of Report**

The attached report identifies each of the major projects/contracts or purchases that are expected to come before the Board between July 1 and December 31, 2015. Information provided for each project includes a brief project description, FY 2015-16 Budget, and the schedule associated with known major milestones (issue RFP/RFQ, execute contract, etc.).

### **Attachment**

Information Management Major Projects for Period July 1 through December 31, 2015

**ATTACHMENT**  
**September 4, 2015 Board Meeting**  
**Information Management Major Projects**  
**for the Period of July 1 through December 31, 2015**

<b>Item</b>	<b>Brief Description</b>	<b>Budgeted Funds</b>	<b>Schedule of Board Actions</b>	<b>Status</b>
OnBase Software Support	Authorize the sole source purchase of OnBase software subscription and support for one year.	\$122,980	Approve Sole Source Purchase July 10, 2015	Completed
Oracle PeopleSoft Software Support	Purchase of Oracle PeopleSoft software support and maintenance for the integrated Finance/HR system.	\$328,800	Approve Purchase July 10, 2015	Completed
Website Evaluation and Improvement Contract	Award contract to _____ to evaluate SCAQMD's current website, make recommendations and implement those improvements.	TBD	October 2, 2015	On Schedule
Hearing Board and GB Rooms Audio Visual System Upgrades	Select vendor to upgrade the audio visual systems in the Hearing Board and GB rooms at the Diamond Bar headquarters.	\$401,000	Release RFP April 3, 2015; Award Contract September 4, 2015	On Schedule
Telecomm Services	Select vendor(s) to provide local, long distance, internet, cellular services, and phone equipment maintenance for a three-year period.	\$750,000	Release RFP September 4, 2015; Award Contract(s) December 4, 2015	On Schedule
Systems Development, Maintenance, and Support	Provide Development, Maintenance and support for: <ul style="list-style-type: none"> <li>• Web Application Development</li> <li>• e-Commerce Implementation</li> <li>• CLASS System Replacement</li> <li>• CLASS System Enhancements</li> <li>• Version Upgrades</li> </ul>	\$345,000	October 2, 2015	On Schedule
Prequalify Vendor List for PCs, Network Hardware, etc.	Establish list of prequalified vendors to provide customer, network, and printer hardware and software, and to purchase desktop computer hardware upgrades.	\$300,000	Release RFQ November 6, 2015; Approve Vendors List and Award Purchase February 5, 2016	On Schedule

Double-lined Rows - Board Agenda items current for this month

Shaded Rows - activities completed

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BOARD MEETING DATE: September 4, 2015

AGENDA NO. 27

REPORT: Administrative Committee

SYNOPSIS: The Administrative Committee met on Friday, July 17, 2015. The Committee discussed various issues detailed in the Committee report. The next Administrative Committee meeting is scheduled for Friday, September 11, 2015 at 10:00 a.m.

RECOMMENDED ACTION:

Receive and file.

Mayor Dennis Yates, Vice Chair  
Administrative Committee

drw

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**Attendance:** Attending the July 17, 2015 meeting was Committee Vice Chair Dennis Yates at SCAQMD headquarters, and Committee Member Clark Parker, Sr. attended via videoconference. Committee Members William Burke and Judith Mitchell were not present.

**ACTION/DISCUSSION ITEMS:**

1. **Board Members' Concerns:** None.
2. **Chairman's Report of Approved Travel:** Executive Officer Barry Wallerstein reported that Board Member Judith Mitchell will be traveling to Sacramento to attend the monthly CARB Board meeting.
3. **Approval of Compensation for Board Member Assistant(s)/Consultant(s):** Dr. Wallerstein reported that Board Member Joseph Lyou is requesting that Nicole Nishimura's contract status be amended from Board Member Assistant to Board Member Consultant.



Less than a quorum was present; the Committee Members concurred that this item be forwarded to the full Board for approval.

4. **Report of Approved Out-of-Country Travel:** None.
5. **Execute Contract for Website Evaluation and Improvements:** Assistant DEO/Information Management Chris Marlia advised that this item was being delayed for one month to allow completion of the initial task by the two applicants through July, and may be subsequently scheduled for a Special Meeting of the Administrative Committee.
6. **Authorize Purchase of Audio-Visual System Upgrades in the Hearing Board and GB Rooms:** Chris Marlia reported that proposed upgrades to the sound and camera equipment and webcast/streaming capabilities of the audio-visual systems in the Hearing Board Room and GB Conference Room would result in better quality and increased capacity; therefore, he recommended selection of Digital Networks Group, Inc., the single qualified bid received out of six bidders, to design and implement the upgrades. Dr. Wallerstein added that the proposed upgrades would further allow greater access to community members who wished to monitor Hearing Board matters via webcast, and cited the recent Exide hearings as an example of a high-profile issue on which the public could not remotely observe or testify. Upon inquiry by Dr. Parker, Mr. Marlia advised that webcast/streaming options were currently only available from the Auditorium and several very small conference rooms.

Less than a quorum was present; the Committee Members concurred that this item be forwarded to the full Board for approval.

7. **Authorize the Executive Officer to Execute an Agreement to Transfer Oversight of BP/SCAQMD Public Benefits Program to the Governing Board, Approve Administrative Changes to Existing Program Contracts, and Execute Contract for an Air Pollution Health Effects Study:** Health Effects Officer Dr. Jean Ospital reported that, inasmuch as the funds and projects are nearing completion and BP no longer has a presence in Southern California, in consideration of the recent unfortunate passing of the Program's SCAQMD public member Joe Calhoun, and with concurrence of BP, oversight of the Program will transfer to the SCAQMD Board. This will entail the administrative transfer of current funds and projects funded by the Program to SCAQMD and the funding of a final health impact study by UCLA on ambient pollutants with the remaining balance of \$172,000. Dr. Wallerstein remarked that this ten-year, \$30 million Program has produced good results for the community, providing funds for treatment of asthma and respiratory disease, funding meaningful

research on health effects, allowing asthma vans to visit schools, and bringing children to asthma-related summer camp programs.

Less than a quorum was present; the Committee Members concurred that this item be forwarded to the full Board for approval.

8. **Appropriate Funds from Designation for Litigation and Enforcement and Authorize Amending/Initiating Contracts with Outside Counsel and Specialized Legal Counsel and Services:** General Counsel Kurt Wiese reported on staff's request for a \$750,000 increase in the environmental litigation budget, driven primarily by the ongoing Exide litigation and the Phillips 66 CEQA lawsuit. Mr. Wiese noted that the SCAQMD will be reimbursed for legal fees incurred in the Phillips 66 matter upon conclusion of litigation defending its permit, pursuant to the Board's previously approved written agreement with Phillips 66.

Less than a quorum was present; the Committee Members concurred that this item be forwarded to the full Board for approval.

9. **Execute Contract for CEQA Consultant Assistance:** Assistant DEO/Planning, Rule Development & Area Sources Jill Whynot reported on staff's selection of Environmental Audit, Inc., to assist staff in supplementing resources for CEQA environmental review and documentation in regard to the 2016 AQMP. Ms. Whynot advised that a technically qualified panel had selected the firm as most qualified out of several proposals, and that staff had previously used this firm with good results. The \$125,000 contract includes an option to extend for up to two years based on satisfactory performance. Dr. Parker inquired as to whether the SCAQMD would be reimbursed for expenses incurred in CEQA review, whereupon Ms. Whynot advised that CEQA review specific to the AQMP is not reimbursable, as it is done in-house; however, if this firm is used to assist staff in the preparation of CEQA documentation and industry review on behalf of a facility, those costs are recoverable. She further advised that if the firm is used to assist staff in writing a report in development of one of SCAQMD's own rules or programs, those costs would not be reimbursable.

Less than a quorum was present; the Committee Members concurred that this item be forwarded to the full Board for approval.

10. **Recognize Revenue and Appropriate Funds for AB 1318 Weatherization Projects:** Science & Technology Advancement Program Supervisor Connie Day provided an update on the AB 1318 weatherization program and projects and advised of a unique opportunity to partner with the Southern California Gas Company (SoCalGas) and Energy Upgrade California for residential rebates of

up to \$50,000 each, with the potential to recognize up to \$100,000 for the AB 1318 Mitigation Fees Fund. Ms. Day advised that participation in these rebate programs require the SCAQMD enter into separate MOUs with SoCalGas and Energy Upgrade California to facilitate such rebates, recognize the funds, turn the rebated funds back over to the program, and enable these weatherization upgrades to additional homes in the AB 1318 environmental justice area via contract modification with the weatherization contractor. Dr. Parker recommended that the contract(s) with the weatherization contractor(s) set forth an explicit understanding of the SCAQMD's expectations and the contractor's obligation to upgrade such additional homes beyond those originally designated, that such accountability be clear. In response to Mayor Yates' inquiry on how SCAQMD became involved in the weatherization business, Dr. Wallerstein reviewed the background of AB 1318 and the mitigation of Sentinel Power Plant emissions, including through energy conservation projects. Ms. Day also noted that these contracts should be completed by year's end.

Less than a quorum was present; the Committee Members concurred that this item be forwarded to the full Board for approval.

11. **Report of RPFs Scheduled for Release in September:** Chief Financial Officer Michael O'Kelly advised that RFPs scheduled for release in September include one for janitorial services and another for telecommunications services, the resulting contracts for which would come before the Administrative Committee for review and approval once the proposals are received.

Less than a quorum was present; the Committee Members concurred that this item be forwarded to the full Board for approval.

12. **Revise Procurement Policy and Procedure:** Michael O'Kelly presented several options for consideration by the Committee, as a result of Dr. Parker's previous request that the SCAQMD's Procurement Policy and Procedure be revised to incorporate a "most favored customer" preference into the procurement process, and discussed possible scenarios and outcomes of awarding several levels of preference points in evaluating proposals responding to a hypothetical RFP so as to ensure that such approach would be manageable and equitable. Dr. Parker recommended the SCAQMD adopt the "most favored customer" approach in its procurement policies, with a two-to-three point preference differential; and, he further commented that the firms doing business with the SCAQMD receive value in claiming SCAQMD as a customer. Dr. Wallerstein suggested a preference point cap start out at two points to allow staff to determine if the policy is effective, and to perhaps subsequently be increased to three points if necessary to improve effectiveness after several months. He further recommended that this matter return to the Committee so that it may

receive a status report and monitor the impact and effectiveness of the revised policy. Mayor Yates and Dr. Parker concurred.

Less than a quorum was present; the Committee Members concurred that this item be forwarded to the full Board for approval.

13. **Environmental Justice Advisory Group Draft Minutes from the April 24, 2015 Meeting:** Attached for information only are the draft minutes from the April 24, 2015 meeting of the Environmental Justice Advisory Group.
14. **Review of the September 4, 2015 Governing Board Agenda:** There were no questions regarding the September 4, 2015 Board Agenda; however, Dr. Wallerstein commented that the public hearing on Amend Rule 1148.1 remained open to those who had not previously testified on the item, and that the public hearing on Amend Rule 1148.2 had been closed. At Dr. Parker's inquiry on the public's ability to comment on those agenda items during the concluding "public comment period," Mr. Wiese remarked that this provided an opportunity for comment on non-agenda items only.
15. **Other Business:** None.
16. **Public Comment:** None.

Meeting adjourned at 10:44 a.m.

**Attachment**

Environmental Justice Advisory Group Minutes from the April 24, 2015 Meeting



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

**DRAFT**

## **ENVIRONMENTAL JUSTICE ADVISORY GROUP FRIDAY, APRIL 24, 2015 MEETING MINUTES**

### **MEMBERS PRESENT:**

Dr. Joseph Lyou, AQMD Governing Board Member, EJAG Chairman  
Rhetta Alexander, San Fernando Valley Interfaith Council  
Dr. Lawrence Beeson, Loma Linda University, School of Public Health  
Suzanne Bilodeau, Knott's Berry Farm  
Paul Choe, Korean Drycleaners & Laundry Association  
Dr. Afif El-Hasan, American Lung Association  
Mary Figueroa, Riverside Community College  
Maria Elena Kennedy, Quail Valley Task Force  
Msgr. John Moretta, Resurrection Church  
Daniel Morales, National Alliance for Human Rights  
Woodie Rucker-Hughes, NAACP – Riverside Branch

### **MEMBERS ABSENT:**

Micah Ali, Compton Unified School District  
Judy Bergstresser, Member of the Public  
Alycia Enciso, Small Business Owner  
Andrea Hricko, Southern California Environmental Health Sciences  
Rudy Gutierrez, Member of the Public  
Evelyn Knight, Long Beach Economic Development Commission  
Lizette Navarette, University of California, Riverside  
William Nelson, OC Signature Properties  
Brenda Threatt, S. Los Angeles Service Representative for L.A. Mayor  
Rafael Yanez, Member of the Public

### **OTHERS PRESENT:**

Daniela Arellano, Community Member  
Sue Gernick, Western States Petroleum Association

### **SCAQMD STAFF:**

Derrick Alatorre, Assistant DEO  
Joe Cassmassi, Planning & Rules Manager  
Nancy Feldman, Principal Deputy District Counsel  
Philip M. Fine, Deputy Executive Officer  
Susan Nakamura, Director of Strategic Initiatives  
Daniel Wong, Secretary

### **Agenda Item #1 - Call to Order/Opening Remarks**

Chair Dr. Joseph Lyou called the meeting to order at 12:05 PM.

Chair Lyou recommended opening remarks be moved to community updates. There are a number of updates under item 4, including the latest on Exide.

### **Agenda Item #2 – Approval of January 30, 2015 Meeting Minutes**

Chair Lyou called for the approval of the meeting minutes. The January 30, 2015 meeting minutes were approved.

### **Agenda Item #3 – Review of Follow-Up/Action Items**

Mr. Derrick Alatorre reviewed action items:

- 1.) The dates and locations for community meetings related to the 2016 Air Quality Management Plan (AQMP) have not been finalized, but once meetings are confirmed the information will be circulated to the group.
- 2.) On Wednesday, April 29, 2015, at SCAQMD beginning at 1:00 p.m., there will be a Working Group meeting on the AQMP White Paper related to off-road equipment.
- 3.) The link to environmental curriculum developed by Progressive Christians United was sent to EJAG Members.

Mr. Alatorre stated that Councilman Cacciotti would like to participate in today's EJAG meeting via telephone.

Dr. Lawrence Beeson brought up an email from Daniel Wong that included two action items. The first action item link "could not be displayed." Chair Lyou responded to go to SCAQMD website and search "white paper" to find link. Dr. Beeson also brought up second action item link that did work; however, blank pages come out when printed.

### **Agenda Item #4 – Member Updates**

Mr. Daniel Morales provided an update on a proposed storage facility for a concrete manufacturer in the City of Colton. The proposed facility was located near an elementary school and could result in increased heavy-duty truck traffic. Mr. Morales reported that the City Council voted to deny the project.

Chair Lyou introduced Councilmember Cacciotti as an honorary member of the meeting for the day and stated that since his location was not made public and put on the agenda that he would only be able to listen in as a non-participating member.

Dr. Lawrence Beeson presented on a report that his peers reviewed on respiratory health of children living near San Bernardino rail yard that has been published. Dr. Beeson also indicated that Loma Linda is working on a couple more manuscripts which are related to the rail yard study.

***Action Item:** Chair Lyou requested a copy of the report and that it is sent out to all members of EJAG.*

Ms. Maria Elena Kennedy announced that the California State University (CSU) Chancellor's office has approved a center for disadvantaged communities. This center will provide technical assistance to disadvantaged communities because too often they do not have the capacity or the resources to apply for grants or other programs. Ms. Kennedy further reported that Assembly Member Anthony Rendon has introduced Assembly Bill 615 which would codify the CSU Center for Disadvantaged Communities. Ms. Maria Elena inquired whether or not SCAQMD would be able to support AB 615.

Chair Lyou responded that they would need to ask the Chair of Legislative Committee Chair, Councilmember Judith Mitchell, to put AB 615 on their agenda.

***Action Item:** Ms. Kennedy to provide information on AB 615 for review by the SCAQMD Executive Office and potentially the Legislative Committee.*

Msgr. John Moretta provided an update related to Exide Technologies and thanked those who helped support the communities' efforts. He reported that Exide chose to shut down under pressure of a federal Grand Jury investigation by the U.S. Attorney's office. Msgr. Moretta further reported that Exide has been required to provide \$39 million for clean-up related to their Vernon facility and that the Department of Toxic Substances Control (DTSC) is overseeing the clean-up including homes in the affected area. He also indicated that while Exide's shutdown is historical, there are on-going concerns regarding the clean-up including potential worker safety issues, possible contamination in public areas of the community and schools, and ground water in Vernon.

**Agenda Item #5 – Rule 415: Odors from Rendering Facilities and Rule 416: Odors from Kitchen Grease Processing**

Dr. Phil Fine presented on Proposed Rule 415: Odors from Rendering Facilities and Proposed Rule 416: Odors from Kitchen Grease Processing.

Mr. Daniel Morales inquired if it is possible to monitor the best management practices (BMPs) at the rendering facilities to ensure they are complying with the rule. Dr. Fine responded that each facility is required to keep records of their operations including BMPs. He added that SCAQMD inspectors also visit the facilities to check whether or not they are operating in compliance.

Ms. Mary Figueroa asked about the demographics of the communities surrounding the rendering facilities. Msgr. John Moretta described the affected areas including Boyle Heights which is bordered by Indiana Street and East Los Angeles on the north; the cities of Commerce and Vernon on the east; and, the cities of Maywood, Bell and Huntington Park on the southeast side. Msgr. Moretta explained that the winds blow in the direction of Boyle Heights carrying odors from the rendering facilities. Mr. Derrick Alatorre explained that the communities in and around the rendering facilities are primarily Latino and that there are five freeways surrounding and through the area. Chair Lyou added that Maywood is the most densely populated city in the United States. Ms. Figueroa explained that based on the demographics of the area, that it is highly likely that the residents are disenfranchised and much less likely to file air quality complaints. Dr. Fine acknowledged that there are challenges in these communities, but that SCAQMD is aware of the issues and is committed to reducing air pollution to improve quality of life. Msgr. Moretta noted that the community meeting in Commerce regarding the proposed rule was well attended including students who testified that the odors caused them to have to go indoors.

Ms. Maria Elena Kennedy inquired whether or not the Regional Water Board has been involved with the rendering facilities. Dr. Fine explained that from an air quality perspective the rendering facilities operate waste water treatment equipment which can be odorous. He further stated that the rendering facilities are heavily regulated by many public agencies including water and health.

Chair Lyou asked if SCAQMD staff had looked at what other agencies and rendering facilities are doing to control odor issues. Dr. Fine stated that staff had visited rendering facilities in state and one in Florida. He explained that the new facilities are utilizing improved technologies and construction such as total enclosures; and/or, are not being allowed to be built near residences. Dr. Fine indicated that our situation is different as both the facilities and residences have been in existence for a long time.

Chair Lyou asked staff about the status of an odor characterization project that a consultant was working on with SCAQMD. Dr. Cher Snyder responded that the consultant has completed their work to develop odor wheels and vocabulary which have been implemented in some cases. Dr. Snyder stated that staff is continuing to work on these tools to characterize odors and how to best work with communities on these types of issues.

#### **Agenda Item #6 – Update on Emerging the Revised Office of Environmental Health Hazard Assessment (OEHHA) Risk Assessment Guidelines**

Ms. Susan Nakamura provided an update on the revised OEHHA Risk Assessment Guidelines.

Ms. Suzanne Bilodeau asked about the origin of the data from the “Trends in Air Toxic Cancer Risk” graph in the presentation. Ms. Nakamura indicated that the graph was based on data from the air monitoring stations.

Dr. Afif El-Hasan inquired if there was a synergistic effect between toxic elements. Chair Lyou replied that there is currently a study being conducted to look at how chemicals react and overall toxicity. He added that the work is being done by Dr. John Froines, and that it may be possible to request a presentation in the future.

#### **Agenda Item #7 – Overview of the PM2.5 Impact at Mira Loma**

Mr. Joe Cassmassi presented on the 2016 Air Quality Management Plan; and the PM2.5 profile impacting the Mira Loma area.

Ms. Kennedy inquired about the cooking data shown in the graph entitled “Emissions Categories Contributing to PM2.5.” Mr. Cassmassi clarified that the data refers to commercial cooking such as under-fire char broilers. He added that the University of Riverside is conducting research in this area on behalf of SCAQMD.

Dr. Lawrence Beeson asked what scale was used in the “Meteorological Profile.” Mr. Cassmassi indicated the scale was based on a 24-hour period.

Ms. Figueroa stated that a lot of the dairies in the Mira Loma area have been replaced by the residential area called Eastvale. She also asked what types of alternate transportation options exist and how they could affect freight movement in the Inland Empire. Ms. Figueroa added that the warehousing projects in Moreno Valley will add to the traffic on the 60-freeway. Mr. Cassmassi responded that SCAQMD is looking at potential ways to assist communities to develop sustainably and employ clean technologies. Mr. Tracy Goss added that there are approximately 110,000 head of cattle between Chino, Ontario and San Jacinto. There are more cattle in San Jacinto with the herds on a decreasing trend in Chino and Ontario as housing prices are on the rise and farms are turning into residential neighborhoods.

#### **Agenda Item #8 – Other Business**

Dr. Lyou asked the EJAG members if anyone had toured the lab.

*Action Item: Schedule a tour for EJAG members at the next meeting.*

Mr. Marc Carrel announced that the SCAQMD Environmental Justice Community Partnership event on May 26, 2015 in Mira Loma. Ms. Figueroa suggested contacting the University of California, Riverside Center for Healthy Communities as they are working on a Latino health initiative; and, that this group may be interested in attending the event.



Ms. Alexander inquired about the Trans Pacific Trade Partnership Agreement and whether or not it would have an impact on SCAQMD rules and regulations. Chair Lyou responded that staff would need to research the issue.

*Action Item:* Staff to research the Trans Pacific Trade Partnership Agreement and whether or not it would have an impact on SCAQMD rules and regulations.

**Agenda Item #9 – Public Comment**

No public comment.

**Agenda Item #10 – Adjournment**

The meeting was adjourned at 1:51 p.m.

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BOARD MEETING DATE: September 4, 2015

AGENDA NO. 28

REPORT: Special Administrative Committee

SYNOPSIS: A Special Meeting of the Administrative Committee was held on Friday, August 14, 2015 to interview proposers for website improvements, to consider the purchase of a Cleveland Pressureless Convection Steamer and to consider a contribution up to \$1 million to UC Riverside. The next Administrative Committee meeting is scheduled for Friday, September 11, 2015 at 10:00 a.m.

RECOMMENDED ACTION:  
Receive and file.

Dr. William A. Burke, Chair  
Administrative Committee

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**Attendance:** Attending the August 14, 2015 meeting were Committee Member Dennis Yates at SCAQMD headquarters and Committee Members William Burke, Clark Parker, Sr., and Judith Mitchell via videoconference. Dr. Burke appointed Supervisor John Benoit as a one-time Committee Member for today's meeting, participating via teleconference.

**ACTION/DISCUSSION ITEMS:**

1. **Approval of Compensation for Board Member Assistant(s)/ Consultant(s):** Dr. Joseph Lyou's Board Consultant Nicole Nishimura's FY 2015-16 contract was submitted for approval.

Moved by Mitchell; seconded by Yates; unanimously approved.

2. **Execute Contract for Website Evaluation and Improvement:** Due to insufficient time for Committee Board Members to review the proposers' material, the Committee Board Members concurred that this item be delayed to

the September 11, 2015 Administrative Committee.

3. **Authorize Purchase of a Cleveland Food Steamer:** Mayor Dennis Yates indicated that the food steamer replacement for the headquarters cafeteria was necessary.

Moved by Yates; seconded by Mitchell; unanimously approved.

4. **Approve a Contribution of up to \$1 million for the Proposal by the County of Riverside, University of California Riverside, UCR College of Engineering-Center for Environmental Research and Technology (CE-CERT), City of Riverside, and Riverside Public Utilities (RPU) for CARB's Southern California Consolidation Project:** Councilmember Judith Mitchell recused herself due to conflict of interest with her participation on the CARB subcommittee for final selection of one of the proposed sites for this effort.

Executive Officer Barry Wallerstein reported that CARB has decided to move its facilities from El Monte to a new site as it has outgrown its existing facilities and plans to significantly increase the number of mobile source-related staff. The current site doesn't have adequate space to bring in large truck dynos involved with programs such as Goods Movement. Upon Board direction, Dr. Wallerstein had a discussion with CARB on whether SCAQMD could accommodate CARB's facility needs, but it was determined that SCAQMD didn't have the capacity.

CARB has been going through a preliminary process to affiliate itself with a college campus. Through the process, several campuses dropped out, resulting in two remaining campuses: University of California Riverside (UCR) and Cal Poly Pomona. The Riverside area has put together a cohesive team, which includes Riverside County, UCR, UCR's College of Engineering Center for Environmental Research and Technology (CE-CERT), the City of Riverside and the Riverside Public Utilities that collectively have done extensive research related to motor vehicle pollution. SCAQMD has had a long history with UCR on the topic of air pollution science and control, with much of the atmospheric chemistry work, for example, being done at UCR.

With the Board's growing emphasis on mobile sources, there is an opportunity for the Board to make a contribution in the form of an endowment which would help secure a new professorship at UCR which could be involved in directing mobile source-related research, with added benefits of attracting students, providing a venue for research projects, recruiting future SCAQMD staff that would bring forth mobile source expertise, and to increase course offerings in the mobile source area. There is also an opportunity for SCAQMD staff to access education on specific topics and to be able to teach courses associated with the

overall effort going on at the campus between CARB and the CE-CERT center. Under the guidance of the Board Chair and Vice Chair, SCAQMD would negotiate specifics with UCR and CARB to ensure any investment made would further advance mobile source controls, increase mobile source expertise, create training abilities for SCAQMD staff, create hiring opportunities for students coming out of the program and have greater interaction on future projects, as well as to directly address AQMP mobile emission reduction targets.

Supervisor Benoit concurred with Dr. Wallerstein's comments and indicated that UC Riverside has good positioning for this effort due to the long history in air pollution research. The County of Riverside recently added a Metrolink station within walking distance of the proposed site, providing added benefit for potential students.

Dr. Parker inquired if CARB was completely leaving its site in El Monte, and Dr. Wallerstein responded that CARB will be completely departing its site to consolidate mobile source staff and expanded test facilities at the new location.

Moved by Yates; seconded by Parker; unanimously approved.

5. **Public Comment:** None.

Meeting adjourned at 10:20 a.m.

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BOARD MEETING DATE: September 4, 2015

AGENDA NO. 29

REPORT: Legislative Committee

SYNOPSIS: The Legislative Committee met on Friday, July 17, 2015.  
The next Legislative Committee meeting is scheduled for Friday,  
September 11, 2015 at 9:00 a.m. in Conference Room CC8.

RECOMMENDED ACTION:  
Receive and file this report.

Michael D. Antonovich  
Acting Chair  
Legislative Committee

LBS:GSA:PFC:jf

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### ***Attendance [Attachment 1]***

The Legislative Committee met on July 17, 2015. All attending Committee Members – Michael Antonovich (who chaired the meeting), Dr. Clark E. Parker Sr., and Janice Rutherford – participated via videoconference.

### **Update on Federal Legislative Issues**

SCAQMD federal legislative consultant, Gary Hoitsma of the Carmen Group, reported on key Washington, D.C. issues:

Mr. Hoitsma provided the Committee with an update on the federal surface transportation reauthorization bill activities in the U.S. House of Representatives. On a bipartisan vote, the House recently passed its version of a five-month extension bill that would extend programs at current levels to December 18 and require a transfer of \$8 billion from the General Fund into the Highway Trust Fund. To pay for this without a tax increase, the bill cobbles together about \$5 billion from a variety of tax compliance measures and about \$3 billion in savings from Transportation Security Administration fees. The bill now goes to the Senate where a separate bill with different provisions is in the works. House leaders – including Paul Ryan, Chairman of the Ways and Means Committee – say they hope that the five-month extension will give Congress enough

time to put together a tax reform package by the end of the year that can pay for a longer term transportation bill.

Mr. Hoitsma also reported on activity regarding House Appropriations bills. While the full House has now passed six of its required 12 appropriations bills this year, it was unable this month to pass the Interior/Environment bill that oversees the U.S. Environmental Protection Agency's budget and includes increased funding for the Target Airshed Grant Program and the Diesel Emission Reduction Act (DERA) program. The full House recently suspended consideration of the bill after controversy arose regarding an amendment on the use of the Confederate flag. It is not clear when the House will resume consideration of the bill.

Mr. Hoitsma reported that it appears likely that the entire appropriations process this year is again headed towards an end-of-the-year stalemate in which none of the bills will pass both legislative houses by the end of the fiscal year. Thus, a December omnibus package is a likely outcome. Meanwhile, SCAQMD and its consultants continue to work closely with Congressman Ken Calvert's office to ensure that increased funding and favorable report language for both the Targeted Airshed Grant and the DERA programs are included in the final bill.

SCAQMD federal legislative consultant, Mark Kadesh of Kadesh & Associates, also reported on various key Washington, D.C. issues:

Mr. Kadesh reported that the Senate will soon take up their version of a bill that will provide a short-term extension of the MAP-21 surface transportation reauthorization bill and provide some funding for the Highway Trust Fund. There is a question as to the term this bill would cover and Senate leadership has discussed the possibility of an 18-month bill, which would require about \$30 billion in offsets.

Mr. Kadesh informed the Committee that the Senate Environment and Public Works Committee recently marked up and passed out the Developing a Reliable and Innovative Vision for the Economy (DRIVE) Act (S. 1647), and the Senate Commerce Committee passed S. 1732, which is expected to be incorporated into the DRIVE Act as the rail title of that bill.

Mr. Kadesh also reported the growing likelihood of a Continuing Resolution (CR) to fund the government after September 30. Unfortunately, the last time there was a long term CR, zero-emissions goods movement funding (of which SCAQMD previously received a portion) was excluded. Senator Feinstein's office has continued to press for inclusion of this provision. On a positive note, SCAQMD is currently awaiting the 2015 issuance of the RFP for \$10 million in zero-emission program funding that was approved last year. The latest indication received from the U.S. Department of Energy staff is that the RFP will be released this summer.

## Update on State Legislative Issues

SCAQMD state legislative consultant, Will Gonzalez of Gonzalez, Quintana & Hunter, briefed the Committee on key Sacramento issues:

Mr. Gonzalez reported that legislative business in Sacramento has temporarily shut down due to the four-week legislative summer recess which just started. Below is a status update on key legislative activity prior to the recess:

- Three High-Profile Environment/Climate Change Bills:
  - SB 350 (De León) - *Clean Energy and Pollution Reduction Act of 2015* - This bill requires by 2030, an increase in the Renewables Portfolio Standard to 50%, a 50% reduction in oil usage, and a 50% increase in building energy efficiency. SB 350 has moved quickly through the Senate and negotiations are underway in the Assembly. Some policy questions at issue are whether rooftop solar energy should count towards utilities' renewable energy requirements and whether utilities should get credit for the electrification of transportation. Further, the provision to reduce use of petroleum is the most controversial, with oil interests lobbying hard in opposition.
  - SB 32 (Pavley) - *California Global Warming Solutions Act of 2006: emissions limit*. – This bill would update the greenhouse gas (GHG) reduction goals of the state, creating a 2050 deadline to reduce GHG emissions in California to 80% below 1990 levels. SB 32 also moved quickly through the Senate; however, it represents a second big vote on climate change that the Legislature will be asked to make in one year, and that may be an issue.
  - AB 1288 (Atkins) - *California Global Warming Solutions Act of 2006: regulations* – This bill would remove the sunset on the GHG Cap and Trade program in California. There has been a mix of positions on this bill, with oil interests in support (with their preference for Cap and Trade over command and control policies) and with various environmental and environmental justice groups in opposition due to a dislike of market-based mechanisms for climate/environmental protections.
- SB 513 (Beall) - *Carl Moyer Memorial Air Quality Standards Attainment Program: fees* – This bill would modernize the Carl Moyer Program and is a high priority for SCAQMD. SB 513 recently passed out of the Assembly Transportation Committee, is now pending in the Appropriations Committee, and appears to be moving without much controversy.

- AB 693 (Eggman) - *Multifamily Affordable Housing Renewables Program* – This is a new bill (due to a recent “gut and amend”) that would take \$100 million per year (10%) of Cap and Trade utility auction revenues, which are currently being rebated back to utility customers, and use this revenue to create a rooftop solar program for disadvantaged communities, with low-income multi-family developments being a target in particular. The bill passed its first policy committee and is a priority for various urban Los Angeles based members. AB 693 would last for 10 years, and cost \$1 billion in total.

Mr. Gonzalez also provided a quick update on the state Budget. The Governor signed the state Budget on time on June 15; however 40% of the Greenhouse Gas Reduction Fund (in excess of \$800 million) was left unallocated pending further negotiations. These funds will likely work themselves into end-of-session negotiations regarding various climate change bills. SCAQMD is watching these fund negotiations carefully and working to ensure that as many funds as possible are utilized to benefit air quality goals and priorities.

Finally, Mr. Gonzalez reported that the Governor has called for two extraordinary legislative sessions to take place: one regarding transportation funding and one on Medi-Cal. The transportation special session will focus on the need to fund transportation infrastructure needs. After the summer recess, issues such as the gas tax, registration fees, and a new type of vehicle maintenance fee will be discussed and addressed. There is bipartisan recognition of an infrastructure funding need; however, there is disagreement on how to pay for possible solutions.

### **Overview of the U.S. Senate’s new Federal Surface Transportation Authorization Legislation, the Developing a Reliable and Innovative Vision for the Economy (DRIVE) Act**

Marc Carrel, Program Supervisor, provided an overview of the U.S. Senate’s recently introduced federal surface transportation authorization legislation. Senate Environment & Public Works (EPW) Committee Chairman, James Inhofe (R-OK) introduced the bill, known as the DRIVE Act. Mr. Carrel outlined contents of the bill that align with SCAQMD’s policy priorities and previously adopted legislative proposals.

Mr. Carrel explained that the bill is for six years (FY 2016 – FY 2021) and calls for spending \$42.9 billion per year on the Federal-Aid Highway Program and \$675 million per year for the popular Transportation Infrastructure Finance and Innovation Act (TIFIA) low-interest loan program. TIFIA allows states to apply for federally backed, low-interest loans to help pay for large construction programs. In May 2014, the SCAQMD Board approved five legislative proposals that staff sought to have included in the next surface transportation authorization bill. These proposals focused on getting more funding for zero- and near-zero emission freight transportation technologies and alternative fuel refueling infrastructure.



Mr. Carrel reported that The DRIVE Act contains one provision that comes from SCAQMD proposals, which would change an existing goal of the National Freight Program from reducing “the environmental impacts of freight movement on the national freight network” to reducing “the environmental impacts of freight movement.” The bill requires a report from the Department of Transportation within three years that includes “best practices to mitigate the impact of freight movement on communities,” funding for clean truck projects, and the designation of national electric vehicle charging and natural gas fueling corridors across the nation. Changes have also been made to eligible Congestion Mitigation and Air Quality projects, including prioritizing funding to reduce PM2.5 and port-related landside emissions with the most cost-effective projects.

Mr. Carrel informed the Committee that, taken together, these policy developments represent positive steps in SCAQMD’s efforts to achieve federal support for zero- and near-zero emission transportation technologies – reflecting the numerous meetings between SCAQMD staff, Senate EPW staffers, and Senator Inhofe himself.

**Report from SCAQMD Home Rule Advisory Group [Attachment 2]**

Please refer to Attachment 2 for written report.

**Other Business:**

None

**Public Comment Period:**

None

**Attachments**

1. Attendance Record
2. SCAQMD Home Rule Advisory Group Report

## **ATTACHMENT 1**

ATTENDANCE RECORD – July 17, 2015

### **SCAQMD BOARD MEMBERS:**

Supervisor Michael Antonovich (Videoconference)

Dr. Clark E. Parker (Videoconference)

Supervisor Janice Rutherford (Videoconference)

### **STAFF TO COMMITTEE:**

Lisha B. Smith, Deputy Executive Officer

Derrick Alatorre, Assistant Deputy Executive Officer/Public Advisor

Guillermo Sanchez, Senior Public Affairs Manager

Julie Franco, Senior Administrative Secretary

### **SCAQMD STAFF:**

Philip Fine, Deputy Executive Officer

Bayron Gilchrist, Assistant Chief Deputy Counsel

Mohsen Nazemi, Deputy Executive Officer

Kurt Wiese, General Counsel

Marc Carrel, Program Supervisor

Tina Cox, Senior Public Information Specialist

Greg Rowley, Telecommunications Technician II

Patti Whiting, Staff Specialist

Kim White, Public Information Specialist

Bill Wong, Principal Deputy District Counsel

Rainbow Yeung, Senior Public Information Specialist (Videoconference)

### **OTHERS PRESENT:**

Mark Abramowitz, Governing Board Member Consultant (Lyou)

Tricia Almiron, SANBAG

Will Gonzalez, Gonzalez, Quintana & Hunter, LLC (teleconference)

Gary Hoitsma, Carmen Group (teleconference)

Mark Kadesh, Kadesh & Associates (teleconference)

Bill LaMarr, California Small Business Alliance

Margot Malarkey, Association of American Railroads

Debra Mendelsohn, Governing Board Consultant (Antonovich)

David Rothbart, Los Angeles County Sanitation District

Andy Silva, Governing Board Member Consultant (Rutherford)

Susan Stark, Tesoro

Warren Weinstein, Kadesh & Associates (teleconference)

## ATTACHMENT 2

### SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

#### LEGISLATIVE REPORT FROM HOME RULE ADVISORY GROUP MEETING OF JUNE 17, 2015

HRAG members present:

Dr. Joseph Lyou, Chairman

Dr. Philip Fine, SCAQMD

Patrick Au on behalf of Chris Gallenstein, CARB (participated by phone)

Mike Carroll, Latham & Watkins on behalf of the Regulatory Flexibility Group

Curt Coleman, Southern California Air Quality Alliance

Jaclyn Ferlita, Air Quality Consultants

Jayne Joy, Eastern Municipal Water District (participated by phone)

Bill LaMarr, California Small Business Alliance

Rongsheng Luo, SCAG (participated by phone)

Art Montez, AMA International

Diane Moss, Renewables 100 Policy Institute

Bill Quinn, CCEEB (participated by phone)

Terry Roberts, American Lung Association of California

David Rothbart, Los Angeles County Sanitation Districts

Larry Rubio, Riverside Transit Agency (participated by phone)

Larry Smith, Riverside Cement

TyRon Turner, We Care About You

Lee Wallace, So Cal Gas and SDG&E

Others: Sue Gornick (WSPA); Daniel McGivney (SoCalGas/SDG&E); Rita Loof (Radtech); Tom Gross (SCE); and Susan Stark (Tesoro).

AQMD Staff: Philip Crabbe, Jill Whynot, Bill Wong, and Marilyn Traynor

#### **LEGISLATIVE UPDATE**

Philip Crabbe reported on the following items that were discussed at the Legislative Committee meeting on June 12, 2015:

#### **Federal**

With regard to the appropriations process, the Senate Democrats are objecting to the overall numbers proposed by the Republicans, resulting in an impasse. If the defense appropriations bill moves forward this month, that bodes well for the Energy & Water Appropriations bill which includes the zero emissions goods movement grant program (which SCAQMD has benefitted from in the past). A delay in the defense bill would bode poorly for the prospects of all the other Senate Appropriations bills moving forward.

Current MAP-21 Surface Transportation programs have been extended through the end of July 2015, and may be extended again through the end of the year. The hope is that by the end of the year new funding will be identified for the passage of a six-year surface transportation bill. Meanwhile, Senators James Inhofe and Barbara Boxer have announced that the Senate

Environment and Public Works Committee will be marking up its new version of the surface transportation bill on June 24, 2015. SCAQMD staff will continue working with the Senate Environment and Public Works Committee staff to try to incorporate SCAQMD's proposals for promoting advanced vehicle technologies. This mark up is a modest step forward as the challenge remains for the Senate Finance and the House Ways and Means Committees to line up funding for the bill.

The House recently voted to pass its version of the fiscal year 2016 Transportation HUD Appropriations bill. The bill proposes a large cut in TIGER grants, slight cuts to transit funding, and slight increases for aviation programs. The bill has zero funding for high-speed rail and includes a specific ban on funding for the California high-speed rail project. The President has already threatened to veto the bill.

The House Appropriations Interior Environment Subcommittee marked up their fiscal year 2016 appropriations bill which funds the U.S. EPA, among other agencies. With Congressman Ken Calvert's help, the subcommittee included \$20 million for the Targeted Airshed Grant Program, which is double the funding level for the current year. The subcommittee included \$50 million for the Diesel Emission Reduction Act (DERA) Program which is an increase of \$20 million from the current funding level. SCAQMD staff will continue to work with Congressman Calvert's office to ensure increased funding and to include bill report language that is beneficial to SCAQMD.

#### State

SCAQMD consultants reported on the following bills:

#### SB 513 (Beall)-Carl Moyer Memorial Air Quality Standards Attainment Program: fees

SB 513, which will modernize funding under the Carl Moyer Memorial Air Quality Standards Attainment Program, passed the Senate floor and is pending in the State Assembly.

#### SB 350 (De León)-Clean Energy and Pollution Reduction Act of 2015

SB 350, which will increase the renewable portfolio standard up to 50%, reduce oil use, and increase energy efficiency, passed the Senate floor and is pending in the State Assembly.

#### SB 32 (Pavley)-California Global Warming Solutions Act of 2006: emissions limit

SB 32 will create new 2030 and 2050 greenhouse gas emission reduction goals. SB 32 passed the Senate floor and is pending in the State Assembly.

#### AB 1288 (Atkins)-California Global Warming Solutions Act of 2006: regulations

AB 1288 removes the sunset on the cap-and-trade program for greenhouse gas. AB 1288 passed the Assembly floor and is pending in the State Senate.

California state Budget negotiations ended June 15, 2015. Within that budget, 60% of the cap and trade funds were approved for continuous appropriations to programs such as high-speed rail and sustainable communities. However, 40% of the cap and trade funds, consisting of annual appropriations, are on hold due to agency preparedness and competing proposals.

The Legislative Committee approved the issuing of a Request for Proposals for SCAQMD's legislative representation in Washington D.C.

The Legislative Committee also made recommendations on the following bills/items:

Bills/Items	Description	Legislative Committee's Recommended Action
SB 398 (Leyva)	Green Assistance Program	Support
SB 400 (Lara)	California Global Warming Solutions Act of 2006: Greenhouse Gas Reduction Fund	Support with Amendments
Greenhouse Gas Reduction Fund Principles	GGRF Investment Guidelines	Adopt

*SB 398 (Leyva)-Green Assistance Program*

SB 398 would create the Green Assistance Program which would provide technical assistance to small businesses, small non-profit organizations, and disadvantaged communities to access funding for energy efficiency upgrades or projects that lessen negative health impacts resulting from poor air quality. The Legislative Committee adopted staff's recommendation of support for the bill.

*SB 400 (Lara)-California Global Warming Solutions Act of 2006: Greenhouse Gas Reduction Fund*

SB 400 would require the California High Speed Rail Authority to allocate not less than 25% of the cap-and-trade funds appropriated from the Greenhouse Gas Reduction Fund to projects that reduce or offset greenhouse gas emissions directly associated with the construction of high-speed rail projects and provide a co-benefit of improving air quality. This bill will also require priority to be given within this expenditure category to measures and projects located in areas designated as extreme non-attainment. The Legislative Committee adopted staff's recommendation of support with amendments for the bill.

*Greenhouse Gas Reduction Fund Principles (GGRF)*

To maximize the benefit to the state of the GGRF investments and to protect the public from the negative health impacts of poor air quality, SCAQMD recommended three principles to guide GGRF investments. These principles were adopted by the Legislative Committee.

*AB 450 (McCarty)-Greenhouse Gas Energy Efficiency Financing*

AB 450 by Assemblymember McCarty (Greenhouse Gas Energy Efficiency Financing) was not presented to the Committee. Staff will continue to watch this bill.

*Discussion*

There was no discussion.

BOARD MEETING DATE: September 4, 2015

AGENDA NO. 30

REPORT: Mobile Source Committee

SYNOPSIS: The Mobile Source Committee met on Friday, July 24, 2015. Following is a summary of that meeting. The next Mobile Source Committee meeting is scheduled for Friday, September 18, 2015 at 9:00 a.m.

RECOMMENDED ACTION:  
Receive and file.

Dr. Joseph K. Lyou, Vice Chair  
Mobile Source Committee

PMF: afm

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### **Attendance**

Committee Vice-Chair Dr. Joseph K. Lyou and Committee Member Judith Mitchell attended at SCAQMD headquarters. Committee Chair Dr. Clark E. Parker, Sr., and Committee Members Ben Benoit and Shawn Nelson were absent. Dr. Lyou chaired the meeting in the absence of Dr. Parker and called the meeting to order at 9:00 a.m.

The following item was presented:

### **INFORMATIONAL ITEM:**

#### **1) 2016 AQMP Development Update**

Dr. Philip Fine, Deputy Executive Officer/Planning, Rule Development and Area Sources, discussed the conceptual framework on which the staff hopes to develop the 2016 Air Quality Management Plan (AQMP or Plan), including defining an attainment pathway that eliminates reliance on Clean Air Act (CAA) Section 182(e)(5) measures (future technologies, referred to as the “black box”). Because such measures anticipate future “new control technologies or improvement of existing control technologies,” reliance is not preferred since the ozone attainment deadlines of 2022 and 2023 are approaching quickly. However, some control

measures identified in the Plan may not qualify as SIP commitments so the U.S. EPA could classify such as Section 182(e)(5) measures. Staff is seeking federal source emission reductions as part of the control strategy as well as significant funding to incentivize early deployment of zero- and near-zero technologies. Such incentives could originate from the state's Greenhouse Gas (GHG) reduction fund (cap-and-trade) or from smart investments in technologies that meet multiple goals for local air quality, climate, toxics and/or energy efficiencies. Other framework elements were highlighted such as selecting the most efficient and cost-effective attainment path, taking credit for co-benefits, prioritizing non-regulatory "win-win" approaches, accounting for international transport of emissions, and enhancing analysis of potential economic impacts.

Dr. Fine outlined the key CAA requirements for the AQMP and the five air quality standards that will be addressed in the 2016 AQMP along with the year of attainment for each standard. He noted how staff is working with U.S. EPA to clarify the differences between best available control technology/measures (BACT/BACM) and reasonably available control technology/measures (RACT/RACM) to ensure compliance with CAA requirements. He also showed the general 'glide path' to be taken to meet all the existing standards with various concentration limits for different pollutants as well as the proposed 8-hour ozone standard at a range of 65-70 ppb. He noted that meeting the more imminent standards assists in meeting the later standards.

Dr. Fine defined the base year emission inventory and listed the sources of the future year growth factors applied to baseline emission inventory. He provided the annual average emissions for 2012 as well as the projected baseline emissions in 2023. He also highlighted the on-road and off-road mobile source categories that should provide significant NO<sub>x</sub> reductions primarily due to fleet turnover and the latest vehicle emissions standards.

Dr. Joseph Lyou questioned why the point source emissions increase over time. Dr. Fine explained that the increase was primarily due to population and/or industry growth without consideration of control measures or future stationary source regulations to offset the increase.

Dr. Fine provided a bar chart of the annual average baseline emissions for the base year 2012 and the future years of 2023 and 2031, which are the ozone attainment demonstration years. He also listed the action items and estimated milestone dates in the Plan development schedule, including the release of documents and sequential agency approvals.

Dr. Lyou inquired on the possibility of bringing the Draft Plan to the full Board before the final consideration in Spring 2016. Councilmember Judith Mitchell

agreed on this being preferable and suggested possible scheduling near the release of the revised Draft Plan. Dr. Fine noted that he intended to report progress and findings of Plan development at future Board meetings and clarified that such reports would not seek an approval decision. The Board members noted that Plan updates would allow the full Board to discuss and provide input during the development as opposed to deciding only on the final product.

Dr. Fine discussed the draft release of eight White Papers with final versions intended to be received and filed to the Board in September; and two remaining White Papers, Energy Outlook and Facility Modernization, to follow. He noted that the White Papers are not consensus documents but do provide issues raised by the working group participants for consideration.

Critical actions recommended to be taken by the U.S. EPA and CARB were discussed, including lowering of the NO<sub>x</sub> emission standard to 0.02 g/bhp-hr and deployment of zero emission trucks. Dr. Lyou questioned the availability in large numbers of battery electric trucks and zero emission drayage trucks; Councilmember Mitchell inquired about the near-term accessible quantity of such trucks. Staff acknowledged that ready commercial availability for some uses has not been achieved since such vehicles are still in the demonstration phase, but was optimistic that availability would occur within a couple of years.

Dr. Fine showed a graph depicting dramatically greater air quality improvement stemming from a lower NO<sub>x</sub> emission standard of 0.02 g/bhp-hr if required by the U.S. EPA as opposed to being required by CARB. He reminded the audience that clean mobile source technologies such as electric passenger vehicles and hybrid medium-duty trucks, needed to attain the standards, are being manufactured and available. Other mobile source technologies, such as an overhead catenary for zero emission corridors and longer-haul heavy-duty electric trucks are still in the demonstration phase.

Councilmember Mitchell and Dr. Lyou requested that staff consider petitioning to the federal government to pursue separate rulemaking for a lower NO<sub>x</sub> standard for heavy-duty truck engines. Dr. Fine suggested the strategy could be a control measure in the 2016 AQMP albeit it is not certain U.S. EPA would accept this as a SIP commitment.

Dr. Lyou questioned the staff comment seeking additional authority to be provided to the states. Dr. Fine clarified that CARB was looking into actions that can be taken without requiring federal consent. Dr. Lyou suggested consideration of more than one pathway for attainment of the standards and Dr. Fine responded that choices are available in determining the range of emission reductions for each of the proposed control measures.



Dr. Lyou raised the potential of an eventual need to provide specific direction as to new technology, such as electric or fuel cells, etc., even though the existing policy is to remain fuel neutral. He also believes the conversation regarding options of funding sources should begin regardless if it is an “uncomfortable subject” for some to discuss.

Finally, Dr. Lyou stressed that more emphasis should be placed on reductions achieved by transportation control measures (TCM) in the 2016-2040 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) and that the difference in population growth may not correlate linearly to an increase in air emissions. In the future, the population might be driving less due to an increase in the elderly population, fewer working people, increase in public transit options, and a positive shift in the use of public transit. Dr. Fine noted that impacts from TCMs are included in the baseline inventory in the Plan and underscored the diminishing return in vehicle miles traveled (VMT) when the cars are emitting less, if any, air pollution. He mentioned the likelihood that leaps in technology advancement produce the real emission reduction and not necessarily from a decrease in VMT. Dr. Lyou agreed and noted that because decreased VMT would assist in reducing congestion, the best option was cleaner vehicles and transport, plus increased use of good, and effective public transit.

**WRITTEN REPORTS:**

**2) Rule 2202 Activity Report**

The report was received as submitted.

**3) Monthly Report on Environmental Justice Initiatives – CEQA Document Commenting Update**

The report was received as submitted.

**OTHER BUSINESS:**

None.

**PUBLIC COMMENT:**

None.

The meeting was adjourned at 9:51 a.m.

**Attachment**

Attendance Roster

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
MOBILE SOURCE COMMITTEE MEETING  
Attendance Roster - July 24, 2015**

NAME	AFFILIATION
Dr. Joseph Lyou	SCAQMD Governing Board
Councilmember Judith Mitchell	SCAQMD Governing Board
Board Consultant Mark Abramowitz	SCAQMD Governing Board (Lyou)
Board Consultant Andrew Silva	SCAQMD Governing Board (Rutherford)
Curtis Coleman	SoCal Air Quality Alliance
Sue Gornick	Western States Petroleum Association
Susan Stark	Tesoro
Philip Fine	SCAQMD Staff
Jill Whynot	SCAQMD Staff
Joe Cassmassi	SCAQMD Staff
Barbara Baird	SCAQMD Staff
Matt Miyasato	SCAQMD Staff
Kurt Wiese	SCAQMD Staff
Sam Atwood	SCAQMD Staff
Carol Gomez	SCAQMD Staff
Mark Henninger	SCAQMD Staff
Michael Krause	SCAQMD Staff
Ian MacMillan	SCAQMD Staff
Jean Ospital	SCAQMD Staff
Dean Saito	SCAQMD Staff
Patti Whiting	SCAQMD Staff

BOARD MEETING DATE: September 4, 2015

AGENDA NO. 31

REPORT: Stationary Source Committee

SYNOPSIS: The Stationary Source Committee met Friday, July 24, 2015.  
Following is a summary of that meeting.

RECOMMENDED ACTION:  
Receive and file.

Dr. Joseph Lyou, Vice Chair  
Stationary Source Committee

MN:am

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### **Attendance**

The meeting began at 10:30 a.m. In attendance at SCAQMD Headquarters were Committee Vice Chair Dr. Joseph Lyou and Committee Member Judith Mitchell. Committee Member Ben Benoit attended via videoconference. Absent were Committee Chair Dennis Yates and Committee Member Shawn Nelson.

### **INFORMATIONAL ITEMS**

#### **1. Status Report on Reg. XIII – New Source Review**

Mr. William Thompson, Senior Enforcement Manager, gave a brief update. The report shows that SCAQMD is in compliance with the federal New Source Review program. Mr. Thompson noted that the South Coast Air Basin was reclassified as in attainment with federal PM10 standards; therefore, PM10 will be reported in the future for information only, similarly to CO. This item will be presented to the full Board at the September 4, 2015 Board Meeting. There were no questions or comments.

#### **2. Reg. XX – Regional Clean Air Incentive Market**

Mr. Joe Cassmassi, Planning and Rules Director, provided the Committee with an update of the proposed amendments to Regulation XX, which include a phased-in 14 ton per day (tpd) NOx RECLAIM Trading Credit (RTC) reduction for the top 90 percent of RTC holders, with a 4 tpd reduction in 2016 followed by 2 tpd reductions

each year from 2018 to 2022. Another change under consideration is the establishment of an Adjustment Account for new power plants that are required to hold RTCs at their potential to emit (PTE) level.

Seven representatives from the regulated community addressed the Committee: Ms. Sue Gornick (Western States Petroleum Association), Mr. Chuck Timms (Cities of Burbank and Pasadena), Mr. Curt Coleman (Southern California Air Quality Alliance), Mr. Steve Park is (Interested Party), Ms. Susan Stark (Tesoro), Mr. Karl Lany (Montrose Environmental), and Mr. Lee Wallace (Southern California Gas Company). Their comments included the amount and schedule for the RTC reductions, the date that would be used to determine RTC reductions, the assumption of equipment life for cost-effectiveness analysis, and emission factors for small sources. Representatives for power plants support the concept of the Adjustment Account for NSR holdings but would like to have the RTCs held by each facility rather than the SCAQMD. Comments also included concern for economic impacts and the robustness of the market after the shave. Several of the commenters requested that they receive information in advance of meetings and that a special session of the Stationary Source Committee be held to allow more time for discussion of the proposed amendments.

Dr. Joseph Lyou, Councilmember Judith Mitchell and Mayor Ben Benoit indicated that a special session of the Stationary Source Committee would be beneficial and that they would convey that to the Chair of the Committee. Councilmember Mitchell requested that the special session be held after the draft CEQA and Socioeconomic assessments are released. She also stated that the current rulemaking schedule needs to provide stakeholders with sufficient time to review and provide comments on the rule documents. She also expressed concerns with some of the municipal power generators' ability to comply with the proposed shave. Councilmember Mitchell also asked if the 4 ton per day reduction in 2016 could be modified. Mayor Benoit concurred with Councilmember Mitchell's comments and encouraged SCAQMD staff to continue working with the stakeholders. Dr. Lyou had questions on why facilities would not be able to install BARCT.

Dr. Philip Fine, Deputy Executive Officer, explained the proposed RTC reduction methodology and the difference in the remaining RTCs after the shave versus the actual emissions. Dr. Lyou encouraged SCAQMD staff to continue working with the stakeholders to resolve any outstanding issues.

### **3. Rules 1106 – Marine Coating Operations and 1106.1 – Pleasure Craft Coating Operations**

Dr. Fine provided an update on the proposed amendments to Rule 1106 – Marine Coating Operations and the proposed rescinding of Rule 1106.1 – Pleasure Craft

Coating Operations. The proposal would revise VOC content limits for certain coatings in order to align with U.S. EPA Control Techniques Guidelines and other California air districts, and add some new categories. The proposed amendment would add provisions for pollution prevention measures, enhanced enforceability, and some changes to improve clarity and consistency.

Ms. Rita Loof (Radtech International) commented that although UV/EB technology does not dominate the marine and pleasure craft coatings market, industry is using UV/EB technology. Ms. Loof also stated that the lowest VOC limit in the rule is 275 grams per liter, and that UV/EB coatings are less than 50 grams per liter. Section (f), recordkeeping requirements, of Proposed Amended Rule 1106 should be clarified to specify that the current exemption in Rule 109 for UV/EB materials is not jeopardized. She requested that Test Method D7767 for thin film UV/EB curable materials be included in section (h) of the rule. In addition, flexibility should be allowed for facilities on the transfer efficiency requirements since the use of those products is preventing and controlling pollution instead of generating it.

Dr. Fine stated that we're always interested in incentivizing the lower-VOC products and will work with Ms. Loof on her suggestions. Regarding the issue about the thin film analysis test method, he stated that staff has not found any application in current use for thin film UV/EB coatings in these categories, but if Ms. Loof has examples staff will look at them.

Dr. Lyou suggested that staff evaluate UV/EB use in this industry, and Councilmember Mitchell commented that this technology is beneficial to lowering VOCs.

### **WRITTEN REPORTS**

All written reports were acknowledged by the Committee.

### **PUBLIC COMMENTS**

There were no public comments.

Dr. Lyou announced that the next Stationary Source Committee meeting is scheduled for September 18, 2015, and adjourned the meeting at 11:35 a.m.

### **Attachments**

Attendance Roster

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
STATIONARY SOURCE COMMITTEE  
July 24, 2015  
ATTENDANCE ROSTER (Voluntary)**

NAME	AFFILIATION
Dr. Joseph Lyou	SCAQMD Governing Board Member
Councilmember Judith Mitchell	SCAQMD Governing Board Member
Mayor Ben Benoit (Videoconference)	SCAQMD Governing Board Member
Mohsen Nazemi	SCAQMD Staff
Board Consultant Mark Abramowitz	SCAQMD Governing Board (Lyou)
Board Consultant Andrew Silva	SCAQMD Governing Board (Rutherford)
Philip Fine	SCAQMD Staff
Jill Whynot	SCAQMD Staff
Kurt Wiese	SCAQMD Staff
William Thompson	SCAQMD Staff
Tina Cox	SCAQMD Staff
Danny Luong	SCAQMD Staff
Lee Wallace	Southern California Gas Company
Christine Grandstaff	Evo Markets
Bill Lamarr	California Small Business Alliance
Sue Gornick	Western States Petroleum Association
Susan Stark	Tesoro
Al Javiar	Eastern Municipal Water District
Rita Loof	RadTech
Karl Lany	SCEC/Montrose Environmental
Chuck Timms	Cities of Burbank & Pasadena
Peter Whittingham	Curt Pringle & Associates

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BOARD MEETING DATE: September 4, 2015

AGENDA NO. 32

REPORT: Technology Committee

SYNOPSIS: The Technology Committee met on July 24, 2015. Major topics included Technology Advancement items reflected in the regular Board Agenda for the September Board meeting. A summary of these topics with the Committee's comments is provided. The next Technology Committee meeting will be held on September 18, 2015.

RECOMMENDED ACTION:  
Receive and file.

John J. Benoit  
Technology Committee Chair

MMM:pmk

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**Attendance:** Supervisor John J. Benoit, Mayor Miguel Pulido and Supervisor Janice Rutherford participated by videoconference. Councilmember Judith Mitchell was in attendance at SCAQMD headquarters. Councilmember Joe Buscaino listened in to the meeting from a non-noticed location. Mayor Dennis Yates was absent due to a conflict with his schedule.

## SEPTEMBER BOARD AGENDA ITEMS

### 1. Establish Residential EV Charging Incentive Pilot Program

An incentive program for residential EV charging will assist in accelerating deployment of PEVs. This action is to establish a residential EV charging incentive pilot program and authorize the Executive Officer to issue rebates to program participants in an amount not to exceed \$500,000 from the Clean Fuels Fund (31).

*Supervisor Rutherford asked if there are navigators to assist the public with determining funding opportunities for the purchase of PEVs and chargers, and how the three-year commitment would work for renters. Staff responded that consumers*

*can visit SCAQMD's website to find out about all of the incentive programs as well as get staff contacts for the different technology areas. Regarding the three-year commitment, the equipment is the individual's property, so they can take it with them if they move within the commitment timeframe.*

*Supervisor Rutherford asked if there will be a specific amount set aside for low-income residents. Staff responded that there is not at this time, because there is insufficient data on the level of interest by low-income residents. However, if the program proves successful, staff will come back to the Board to establish a longer-term program with better knowledge of how much to set aside for low-income residents.*

*Councilmember Mitchell asked if Multi-Unit Dwellings (MUDs) would be eligible for the program. Staff responded that individuals in MUDs would be eligible, but would need to obtain whatever approvals are necessary.*

*Councilmember Mitchell asked how the program would handle incentives if Home Owner Associations want to install chargers for general use and not specific residents. Staff responded that we would take applications and evaluate on a case-by-case basis. However, the current focus is primarily on single-family residences.*

*Supervisor Rutherford asked about combining this program with the Replace Your Ride Program (part of Enhanced Fleet Modernization Program Plus-Up) to encourage greater low-income resident participation. Staff indicated that both programs will help to advertise the other so the consumer gets the best deal possible.*

*Moved by Pulido; seconded by Mitchell; unanimously approved.*

## **2. Execute Contract for EV Charging Stations and Service at SCAQMD Headquarters and Release RFP for Installation**

The Board previously approved the release of an RFP to upgrade and expand EV charging infrastructure at SCAQMD headquarters. Subsequently, an RFP was released for engineering design services, to prepare construction drawings for installation of electrical infrastructure and a utility meter for SCAQMD's natural gas fueling station. A contractor was selected and the drawings will serve as a blueprint for installation. This action is to: 1) execute a contract with Broadband TelCom Power, Inc. for EV hardware and control system at SCAQMD headquarters for up to \$322,425 from the Clean Fuels Fund (31); and 2) release an RFP for contractor services to install the new EV charging stations and the required electrical infrastructure at SCAQMD headquarters.



*Supervisor Rutherford asked about overall cost recovery. Staff responded that the whole EV community is currently struggling with this issue, and it is not an easy question. Cost recovery may be instituted if deemed practical, or alternatively the charging stations may be part of a demand response program instead of requiring cost recovery. Staff will look at how to best manage the use of chargers so as to maintain PEV deployment incentives while minimizing administrative burdens.*

*Supervisor Benoit indicated that the County of Orange found it was more expensive to institute cost-recovery than the cost of the electricity for the charging stations.*

*Supervisor Rutherford asked how it was possible to keep people from monopolizing use of the chargers. Staff responded that a committee will establish charging policies after investigating which policies are most appropriate, and report back to the Committee.*

*Supervisor Benoit suggested that staff initiate a committee that includes union and management representatives to establish the appropriate policy for the agency.*

*Moved by Pulido; seconded by Mitchell; unanimously approved.*

**3. Execute Contracts for FY 2013-14 “Year 16” Carl Moyer Multidistrict Program and Transfer Funds for Multidistrict Truck Projects under Voucher Incentive Program**

On May 6, 2015, proposals were received in response to the Program Announcement issued for the “Year 16” Carl Moyer Multidistrict Program. These actions are to: 1) execute contracts in an amount not to exceed \$1,380,560 from the Carl Moyer Program SB 1107 Multidistrict Fund (32); and 2) transfer \$1,469,440 from the Carl Moyer Program SB 1107 Multidistrict Fund (32) to the Voucher Incentive Program Fund (59) to fund multidistrict truck replacement projects on a first come, first served basis.

*Supervisor Rutherford asked how the projects are evaluated. Staff explained that project categories have specific state guidelines and are evaluated based on their cost-effectiveness in dollars per ton of pollution removed.*

*Moved by Pulido; seconded by Mitchell; unanimously approved.*

**4. Execute Contracts to Cosponsor Sustainable Transportation Energy Pathways 2015-2018 Program **

The Sustainable Transportation Energy Pathways (STEPS) Program at the U.C. Davis Institute of Transportation Studies is continuing their multidisciplinary research consortium that brings together the world’s leading automotive manufacturers, energy companies and government agencies to understand

sustainable vehicle and energy solutions, and this item requests continued funding for 2015 through 2018. This action is to execute a contract with U.C. Davis to cosponsor the STEPS 2015-2018 Program in an amount not to exceed \$240,000 from the Clean Fuels Fund (31).

*Moved by Pulido; seconded by Benoit; unanimously approved.*

**5. Public Comment**

*There was no public comment.*

**6. Other Business**

*There was no other business.*

**Next Meeting: September 18, 2015**

**Attachment**

Attendance

**Attachment – Attendance**

Supervisor John J. Benoit (via Videoconference) .....	SCAQMD Governing Board
Councilmember Joe Buscaino* .....	SCAQMD Governing Board
Councilmember Judith Mitchell .....	SCAQMD Governing Board
Mayor Miguel Pulido (via Videoconference).....	SCAQMD Governing Board
Supervisor Janice Rutherford (via Videoconference) .....	SCAQMD Governing Board
Mark Abramowitz.....	Board Consultant (Lyou)
Buford Crites (via Videoconference) .....	Board Consultant (JBenoit)
Marisa Perez .....	Board Consultant (Mitchell)
Andrew Silva .....	Board Consultant (Rutherford)
Bob Ulloa.....	Board Consultant (Yates)
John Olvera, Principal Deputy District Counsel .....	SCAQMD
Matt Miyasato, STA .....	SCAQMD
Fred Minassian, STA .....	SCAQMD
Randall Pasek, STA .....	SCAQMD
Dean Saito, STA .....	SCAQMD
Al Baez, STA.....	SCAQMD
Drue Hargis, STA .....	SCAQMD
Lisa Mirisola, STA .....	SCAQMD
Matthew Gribble, STA .....	SCAQMD Student Intern
Bill Johnson, AHR.....	SCAQMD
Bruce Jacobson, AHR.....	SCAQMD
Nancy Cole, FIN.....	SCAQMD
Debra Ashby, LPA .....	SCAQMD
Sam Atwood, Media .....	SCAQMD
Paul Wright, IM.....	SCAQMD
Penny Shaw Cedillo, STA .....	SCAQMD
Pat Krayser, STA .....	SCAQMD
Danielle Robinson .....	CARB

\*Listening only, via teleconference

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BOARD MEETING DATE: September 4, 2015

AGENDA NO. 33

REPORT: Special Technology Committee

SYNOPSIS: The Special Meeting of the Technology Committee was held on August 14, 2015. Major topics included Technology Advancement items reflected in the regular Board Agenda for the September Board meeting. A summary of these topics with the Committee's comments is provided. The next Technology Committee meeting will be held on September 18, 2015.

RECOMMENDED ACTION:  
Receive and file.

Dennis R. Yates, Acting Chair  
Technology Committee

MMM:pmk

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**Attendance:** Supervisor John J. Benoit requested that Mayor Yates chair the meeting on his behalf due to technical difficulties resulting in Supervisor Benoit's participation via teleconference. Councilmember Joe Buscaino, Councilmember Judith Mitchell and Supervisor Janice Rutherford participated by videoconference. Mayor Miguel Pulido and Mayor Dennis Yates were in attendance at SCAQMD headquarters.

## SEPTEMBER BOARD AGENDA ITEMS

### 1. **Execute Contract for Tier 4 Passenger Locomotives**

At its February 1, 2013, and February 7, 2014 meetings, the Board approved awards to the Southern California Regional Rail Authority (SCRRA) in the amount of \$52 million for the replacement of 20 passenger locomotives with new Tier 4 locomotives over a four-year period. Under the "Year 16" Carl Moyer Program Announcement, SCRRA submitted a new proposal requesting \$58.85 million for the replacement of an additional 17 and the purchase of 3 new Tier 4 passenger locomotives. Staff has completed the evaluation of the project and confirmed its

eligibility with CARB staff. This action is to execute a contract with SCRRA in an amount not to exceed \$22.85 million from the Carl Moyer Program AB 823 Fund (80). The remaining \$36 million requested by SCRRA will be considered over four phases in future Board requests.

*Mayor Pulido asked if it would still be possible to approve the project if SB 513 amending the Carl Moyer Program passed. Staff responded that funding of the project will actually become easier, since leveraging of the Caltrans funds with the Moyer funds on the same locomotives will be possible.*

*Supervisor Rutherford asked about the state of other technologies that can achieve lower emissions than Tier 4. Staff responded that several options such as LNG, fuel cell, and battery or fuel cell tender cars are being looked at, and SCAQMD is exploring any possibilities for future demonstration and commercialization of these technologies.*

*Councilman Buscaino asked if Tier 4 technology will be available for freight locomotives. Staff responded that GE has a Tier 4 product and the other major locomotive manufacturer will have a product in 2017. Funding may be provided both from the Carl Moyer and the Proposition 1B Programs.*

*Moved by Pulido; seconded by Benoit; unanimously approved.*

## **2. Public Comment**

*Board Consultant Mark Abramowitz asked on behalf of Board Member Joe Lyou how the remaining \$36 million will be provided. Staff responded that staff will ask the Board's approval for \$9 million a year for four years from the AB 923 funds, which generate about \$24 million a year until January 1, 2024.*

**Next Meeting: September 18, 2015**

**Attachment**  
Attendance

**Attachment – Attendance**

Supervisor John J. Benoit (audio) ..... SCAQMD Governing Board  
Councilmember Joe Buscaino (via videoconference) ..... SCAQMD Governing Board  
Councilmember Judith Mitchell (via videoconference) ..... SCAQMD Governing Board  
Mayor Miguel Pulido ..... SCAQMD Governing Board  
Supervisor Janice Rutherford (via videoconference) ..... SCAQMD Governing Board  
Mayor Dennis Yates ..... SCAQMD Governing Board  
Mark Abramowitz ..... Board Consultant (Lyou)  
Bob Ulloa ..... Board Consultant (Yates)  
John Olvera, Principal Deputy District Counsel ..... SCAQMD  
Henry Hogo, STA ..... SCAQMD  
Fred Minassian, STA ..... SCAQMD  
Laki Tisopulos, STA ..... SCAQMD  
Drue Hargis, STA ..... SCAQMD  
Mike O’Kelly, FIN ..... SCAQMD  
Robert Paud, IM ..... SCAQMD  
Penny Shaw Cedillo, STA ..... SCAQMD  
Pat Krayser, STA ..... SCAQMD  
Danielle Robinson ..... CARB  
Anna L. Rice ..... SCRRA

BOARD MEETING DATE: September 4, 2015

AGENDA NO. 34

REPORT: Mobile Source Air Pollution Reduction Review Committee

SYNOPSIS: Below is a summary of key issues addressed at the MSRC's meeting on August 20, 2015. The next meeting is scheduled for Thursday, September 17, 2015, at 2:00 p.m., in Conference Room CC8.

RECOMMENDED ACTION:  
Receive and file.

Michael D. Antonovich  
SCAQMD Representative on MSRC

MMM:HH:AP

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### **Meeting Minutes Approved**

The MSRC unanimously approved the minutes from its June 18, 2015 meeting. Those approved minutes are attached for your information (*Attachment 1*).

### **Local Government Match Program**

As an element of the FYs 2014-16 Work Program, the MSRC allocated \$13.0 million for the Local Government Match Program. A Program Announcement was developed and released on May 1, 2015. As in the previous Work Program, the Local Government Match Program offers to co-fund qualifying medium and heavy-duty alternative fuel vehicles, alternative fuel infrastructure projects, electric vehicle charging infrastructure, and regional street sweeping in the Coachella Valley. The bicycle projects category was expanded to "active transportation", and commercial zero emission riding lawnmowers were added as a new category. In all categories funding is provided on a dollar-for-dollar match basis, and funding for all eligible entities shall be distributed on a first-come, first-served basis with a geographic minimum per county of \$1.625 million. The Program Announcement includes an open application period commencing June 2, 2015 and closing September 4, 2015. Twenty-six applications requesting a total of \$5,216,378 were received prior to the July 29, 2015 MSRC-TAC Local Match Subcommittee meeting. For one application, the Subcommittee, and subsequently the

MSRC-TAC, recommended that the MSRC defer action while additional information is sought. The MSRC approved 25 applications totaling \$5,114,228 as part of the FYs 2014-16 AB 2766 Discretionary Fund Work Program. These awards will be considered by the SCAQMD Board at its September 4, 2015 meeting.

### **Programmatic Outreach Services**

As part of the FYs 2014-16 Work Program, the MSRC released a Request for Proposals for the solicitation of Programmatic Outreach Services. The RFP established a funding target level not to exceed \$120,000 for an initial two-year period, with an option clause for another two-year period. The selected contractor would assist in promoting the MSRC's **Clean Transportation Funding™** programs as well as providing outreach assistance to current and prospective MSRC project implementers. The RFP was released on May 1, 2015. A total of five applications were received by the closing date on June 17, 2015. The top three ranked proposals were interviewed by a panel comprised of members of the MSRC's Technical Advisory Committee. The MSRC approved a contract award to the Better World Group in an amount not to exceed \$118,065 for the base two-year period as part of the FYs 2014-16 AB 2766 Discretionary Fund Work Program, with an option clause for an additional two-year period subject to approval by the MSRC and SCAQMD Board at a later date. This contract award will be considered by the SCAQMD Board at its September 4, 2015 meeting.

### **Transportation Control Measure Partnership Program**

As part of the FYs 2014-16 Work Program, the MSRC allocated \$10.0 million for a program to partner with cities, County Transportation Commissions (CTCs) and others to demonstrate transportation control measure (TCM) projects. Innovative TCM projects have potential to reduce significant numbers of automobile trips or remove impediments to efficient traffic flow. The program is intended to provide a portion of the funding for projects, which when combined with other funding sources would accelerate the projects' implementation. Because CTCs typically solicit and co-fund the majority of TCM projects within their respective jurisdictions, the MSRC determined that CTCs would have the best overall perspective regarding the need for TCMs within their respective regions as well as knowledge of where funding can most effectively be applied. Therefore, the MSRC asked CTCs to bring forward work plans proposing projects for funding. Other interested entities would then participate in the projects via separate agreements with the CTCs.

One work plan has been received to date, from Orange County Transportation Authority (OCTA). As part of the FYs 2014-16 AB 2766 Discretionary Fund Work Program, the MSRC approved the award of a contract not to exceed \$943,643 to OCTA to co-fund five active transportation projects: City of Irvine Freeway Trail Lighting Improvements; City of Cypress Cerritos Avenue Bike Corridor Improvements; City of La Habra Union Pacific Rail Line Bikeway; City of San Juan Capistrano Bikeway Gap Closure; and



County of Orange Lambert Road Bikeway Project. This award will be considered by the SCAQMD Board at its September 4, 2015 meeting.

**Residential EV Charging Incentive Pilot Program**

In a separate item at its September 4, 2015 meeting, the SCAQMD Board will be considering the implementation of a Residential EV Charging Incentive Pilot Program. This Program is intended to offset electric vehicle charging hardware costs by issuing rebates to program participants installing Level 2 chargers at residences. The Program will be implemented on a first-come, first-served basis and will cover up to \$250 for the cost of hardware for all eligible applicants residing within the geographical boundaries of SCAQMD, with an additional incentive of up to \$250 available for lower income residents. The Program is designed not to be duplicative with other incentive programs offered by electric utilities, and SCAQMD will ensure that participants do not receive an incentive, or combination of incentives, that exceed the actual hardware cost.

SCAQMD staff initiated discussions with MSRC staff regarding potential partnership in the Program. As the Program will assist in accelerating deployment of EVs, it is consistent with the MSRC's goals and objectives to reduce motor vehicle emissions. SCAQMD staff would provide the majority of Program administration. The MSRC considered this partnership opportunity and approved an allocation totaling \$500,000 towards the Residential EV Charging Incentive Pilot Program as an element of the FYs 2014-16 AB 2766 Discretionary Fund Work Program. This item will be considered by the SCAQMD Board at its September 4, 2015 meeting.

**Replacement Contract for City of Palm Springs**

As part of the FY 2011-12 Work Program, the MSRC awarded the City of Palm Springs \$38,000 towards the installation of six EV charging stations. The City was subsequently able to obtain additional support from the California Energy Commission, and the MSRC approved a modification allowing the City to use the balance of MSRC funds to install additional stations, requiring the installation of at least 35 stations altogether. By June 2015, 34 stations had been installed and placed into service. Concerns were raised about the contract's lack of specificity in the number of stations. Before those concerns could be resolved, the original contract terminated. The City has since finalized their plans and proposes to install one additional station, of the "DC Fast Charge" variety. The MSRC considered and approved a 72-month replacement contract in the amount of \$21,163 as part of the FY 2011-12 AB 2766 Discretionary Fund Work Program. This item will be considered by the SCAQMD Board at its September 4, 2015 meeting.

### **Received and Approved Final Reports**

The MSRC received and unanimously approved four final report summaries this month as follows:

1. CR&R Incorporated, Contract #MS11016, which provided \$100,000 towards the construction of a new CNG station in Perris;
2. Arcadia Unified School District, MS14052, which provided \$78,000 to expand their CNG station;
3. USA Waste of California, Inc., Contract #MS12004, which provided \$175,000 towards a new CNG station and maintenance facility modifications in Chino; and
4. Orange County Transportation Authority, Contract #MS12061, which provided \$224,000 to implement a bikeshare program in Fullerton.

### **Contracts Administrator's Report**

The MSRC's AB 2766 Contracts Administrator provides a written status report on all open contracts from FY 2004-05 through the present. The Contracts Administrator's Report for August 2015 is attached (*Attachment 2*) for your information.

### **Attachment**

Attachment 1 – Approved June 18, 2015 Meeting Minutes

Attachment 2 – August 2015 Contracts Administrator's Report



**MOBILE SOURCE AIR POLLUTION REDUCTION REVIEW COMMITTEE**  
**THURSDAY, JUNE 18, 2015 MEETING MINUTES**  
21865 Copley Drive, Diamond, Bar, CA 91765- Conference Room CC-8

**MEMBERS PRESENT:**

(Vice Chair) Larry McCallon, representing SANBAG  
Dolores Roybal Saltarelli, representing Regional Rideshare Agency (via v/c)  
Adam Rush (Alt.), representing Riverside County Transportation Commission  
Tim Shaw (Alt.) representing OCTA  
Steve Veres, representing LA County MTA (via v/c)  
Erik White, representing California Air Resources Board  
Greg Winterbottom, representing OCTA

**MSRC MEMBERS ABSENT:**

(Chair) Greg Pettis, representing RCTC  
Michael Antonovich, representing SCAQMD  
Michele Martinez, representing SCAG

**MSRC-TAC MEMBERS PRESENT:**

None

**OTHERS PRESENT:**

Walter Coon, BusWest  
Nicole Diaz, Jurupa USD  
Lauren Dunlap, Southern California Gas  
Bob Ulloa, SCAQMD Board Asst (Yates)  
Ric Teano, OCTA

**SCAQMD STAFF & CONTRACTORS**

Ray Gorski, MSRC Technical Advisor-Contractor  
Henry Hogo, Asst. DEO/Science & Technology Advancement  
John Kampa, Financial Analyst  
Matt MacKenzie, MSRC Contracts Assistant  
Ana Ponce, MSRC Administrative Liaison  
Cynthia Ravenstein, MSRC Contracts Administrator  
Veera Tyagi, Senior Deputy District Counsel  
Rachel Valenzuela, MSRC Contracts Assistant

**CALL TO ORDER**

- Call to Order

MSRC Vice Chair Larry McCallon called the meeting to order at 2:01 p.m., in the absence of MSRC Chair Greg Pettis. Vice Chair McCallon asked that roll be taken. The following members were present at time of roll call: SALTARELLI, VERES, WHITE, WINTERBOTTOM, MCCALLON.

- Opening Comments:  
There were no opening comments.

**PUBLIC COMMENT PERIOD**

- Public comments were allowed during the discussion of each agenda item. No comments were made on non-agenda items.

**CONSENT CALENDAR (Items 1 through 5)****Receive and Approve Items****Agenda Item #1 – Minutes of the May 21, 2015 MSRC Meeting**

The minutes of the May 21, 2015 meeting were distributed at the meeting.

ON MOTION BY MSRC MEMBER GREG WINTERBOTTOM, AND  
SECONDED BY MSRC MEMBER ERIK WHITE, UNDER APPROVAL OF  
CONSENT CALENDAR ITEMS 1 THROUGH 5, THE MSRC  
UNANIMOUSLY VOTED TO APPROVE THE MAY 21, 2015 MSRC  
MEETING MINUTES.

AYES: SALTARELLI, VERES, WHITE, WINTERBOTTOM, MCCALLON.

NOES: NONE.

**ACTION:** Staff will include the minutes in the MSRC Committee Report for the July 10, 2015 SCAQMD Board meeting, and place a copy on the MSRC's website.

**Agenda Item #2 – Summary of Final Reports by MSRC Contractors**

Four final report summaries were included in the agenda package, as follows:

1. County of Los Angeles Department of Public works, Contract #MS08018, which provided \$60,000 for the purchase of 2 trucks equipped with advanced natural gas engines;
2. County of Los Angeles Department of Public Works, Contract #MS10015, which provided \$37,955 for the purchase of 2 trucks equipped with advanced natural gas engines;
3. 99 Cents Only Stores, Contract #MS12072, which provided \$100,000 towards the construction of a CNG station;
4. City of Los Angeles, Bureau of Sanitation, Contract #MS12082, which provided \$175,000 towards the installation of a CNG station.

ON MOTION BY MSRC MEMBER GREG WINTERBOTTOM, AND SECONDED BY MSRC MEMBER ERIK WHITE, UNDER APPROVAL OF CONSENT CALENDAR ITEMS 1 THROUGH 5, THE MSRC UNANIMOUSLY VOTED TO APPROVE THE FINAL REPORTS ABOVE. AYES: SALTARELLI, VERES, WHITE, WINTERBOTTOM, MCCALLON. NOES: NONE.

**ACTION:** MSRC staff will file the final reports and release any retention on the contracts.

**Receive and File Items**

**Agenda Item #3 – MSRC Contracts Administrator’s Report**

The MSRC AB 2766 Contracts Administrator’s Report for April 30 through May 27, 2015, was included in the agenda package.

ON MOTION BY MSRC MEMBER GREG WINTERBOTTOM, AND SECONDED BY MSRC MEMBER ERIK WHITE, UNDER APPROVAL OF CONSENT CALENDAR ITEMS 1 THROUGH 5, THE MSRC UNANIMOUSLY VOTED TO RECEIVE AND FILE THE CONTRACTS ADMINISTRATOR’S REPORT FOR APRIL 30 THROUGH MAY 27, 2015. AYES: SALTARELLI, VERES, WHITE, WINTERBOTTOM, MCCALLON. NOES: NONE.

**ACTION:** SCAQMD staff will include the MSRC Contracts Administrator’s Report in the MSRC Committee Report for the July 10, 2015 SCAQMD Board meeting.

**Agenda Item #4 – AB 2766 Discretionary Fund Financial Report**

A financial report on the AB 2766 Discretionary Fund for the period ending May 31, 2015 was included in the agenda package.

ON MOTION BY MSRC MEMBER GREG WINTERBOTTOM, AND SECONDED BY MSRC MEMBER ERIK WHITE, UNDER APPROVAL OF CONSENT CALENDAR ITEMS 1 THROUGH 5, THE MSRC UNANIMOUSLY VOTED TO RECEIVE AND FILE THE FINANCIAL REPORT FOR THE PERIOD ENDING MAY 31, 2015. AYES: SALTARELLI, VERES, WHITE, WINTERBOTTOM, MCCALLON. NOES: NONE.

**ACTION:** No further action is required.

**Agenda Item #5 – Consider Modified Street Sweeping Route and 23-Month No-Cost Term Extension by City of Coachella, Contract ML12057 (\$57,456 – Purchase One Natural Gas Heavy-Duty Vehicle and Street Sweeping)**

The City requests to revise the street sweeping route specified in their contract, as well as a 23-month no-cost term extension, as part of the FY 2011-2012 Local Government Match Program. The MSRC-TAC unanimously recommended approval.

ON MOTION BY MSRC MEMBER GREG WINTERBOTTOM, AND SECONDED BY MSRC MEMBER ERIK WHITE, UNDER APPROVAL OF CONSENT CALENDAR ITEMS 1 THROUGH 5, THE MSRC UNANIMOUSLY VOTED TO APPROVE THE CITY OF COACHELLA, CONTRACT #ML12057, TO REVISE THE STREET SWEEPING ROUTE SPECIFIED IN THEIR CONTRACT, AS WELL AS A 23-MONTH NO-COST TERM EXTENSION, AS PART OF THE FY 2011-12 LOCAL GOVERNMENT MATCH PROGRAM.

AYES: SALTARELLI, VERES, WHITE, WINTERBOTTOM, MCCALLON.  
NOES: NONE.

**ACTION:** MSRC Staff will amend the above contract accordingly.

[MSRC Alternate Adam Rush arrived at meeting at 2:04 p.m.]

**ACTION CALENDAR (Items 6 through 9)**

**Agenda Item #6 – Consider FY 2015-16 Administrative Budget**

[MSRC Alternate Tim Shaw arrived at meeting at 2:05 p.m.]

Henry Hogo, Assistant DEO/Science and Technology Advancement, presented this item. He referred to page 49 in the agenda package. This is an overview of the current year's budget and expenditures, and the proposed budget for FY 2015-16. There is a five percent limit on the use of revenues received for the MSRC portion of the AB 2766 revenues for Administrative purposes. Shown are three sets of numbers. The current FY 2014-15 adopted budget is shown and the 5% level of \$755,000. The second set of columns is the expenditures to date, including staff salaries, postage, public noticing, etc. Those expenditures are \$631,012 to date, but the FY has not been closed out. This type of information gives an estimate of what the proposed budget will be for the upcoming fiscal year, and that would be close to \$699,185. This reflects a salary increase for staff that was negotiated through the SCAQMD labor and negotiations process for a total salary increase of \$17,166. The other program items are regular travel expenditures, postage, and conferences. Those amounts remain about the same. This also includes 25% of the Technical Advisor's contract amount in the Administrative Budget. Depending on what action the MSRC takes on Agenda Item #8, this amount could change. Staff projects it is going to be about the same for this fiscal year, which is \$37,450. The proposed budget will still be under the 5% Administrative Cap, which leaves about \$65,815. If something should arise within the fiscal year, moneys could be moved out of that unallocated portion to cover the administrative costs and still be under the 5% cap.

ON MOTION BY MSRC MEMBER ERIK WHITE, AND SECONDED BY MSRC ALTERNATE ADAM RUSH, THE MSRC VOTED UNANIMOUSLY TO APPROVE THE 2015-16 ADMINISTRATIVE BUDGET WITH THE PROJECTED ADMINISTRATIVE COSTS OF \$699,185 AGAINST A CAP OF \$765,000.

AYES: SALTARELLI, VERES, WHITE, WINTERBOTTOM, RUSH, MCCALLON.  
NOES: NONE.

**ACTION:** Staff will include this item for consideration by the SCAQMD Board at its July 10, 2015 meeting.

**FYs 2010-11 Work Program****Agenda Item #7 – Authorize Issuance of New Contract to Complete work Initiated by Mineral LLC under Contract #MS11001 (\$111,827 – Design, Develop, Host and Maintain MSRC Website)**

Cynthia Ravenstein, MSRC Contracts Administrator, reported that this item is for the contractor that does the hosting and maintenance for the MSRC website. Back in January, the MSRC authorized exercising the option on their contract that also includes the addition of \$17,200 to the balance that they had of \$8,690. Unfortunately, MSRC staff sent them the contract to sign and Mineral did not get it back on time. SCAQMD's recommendation is to execute the replacement contract to continue the hosting and maintenance of the website for the total amount of \$25,890. The MSRC-TAC reviewed staff's recommendation and they recommend approval of this replacement contract. In the meantime, Mineral has continued to maintain the website.

Veera Tyagi, Senior Deputy District Counsel, added that SCAQMD has a policy where if the contract has expired, they do not extend it, but the RFP had the option to extend the contract for (2) two-year periods. It did not specify that it had to be the same contract extended twice, or two stand-alone contracts. In the end, it is the same result; just following SCAQMD policy.

ON MOTION BY MSRC VICE CHAIR LARRY MCCALLON, AND  
SECONDED BY MSRC ALTERNATE ADAM RUSH, THE MSRC VOTED  
UNANIMOUSLY TO EXECUTE A REPLACEMENT CONTRACT TO  
MINERAL LLC TO CONTINUE TO HOST AND MAINTAIN THE MSRC  
WEBSITE FOR A TOTAL AMOUNT OF \$25,890.

AYES: SALTARELLI, VERES, WHITE, WINTERBOTTOM, MCCALLON,  
RUSH.

NOES: NONE.

**ACTION:** Staff will include this item for consideration by the SCAQMD Board at its July 10, 2015 meeting.

**FYs 2014-16 Work Program****Agenda Item #8 – Consider Option to Extend the Technical Advisor's Contract for Another Two-Year Term or Initiate Request for Proposals**

Cynthia Ravenstein, MSRC Contracts Administrator, reported on this item in the absence of MSRC-TAC Chair Gretchen Hardison. The current contract for MSRC Technical Services with Raymond Gorski was executed on October 2013 and currently expires September 30, 2015. It contains a provision to extend the term for an additional two years to perform services from October 1, 2015 through September 30, 2017, for an amount not to exceed \$299,600. This item is to consider exercising the option or initiating a Request for Proposals for MSRC Technical Advisor Services. The Administrative Subcommittee reviewed Mr. Gorski's performance and noted that he is performing in excellent fashion and they recommend that the MSRC execute the two-year option, extending the term to September 30, 2017 and increasing the contract amount by \$299,600 for a new total contract amount not to exceed \$594,300. The way this funding is split, 25% of the amount is from the Administrative Budgets. That is to be divided evenly between the FY 2015-16 and FY 2016-17 Administrative Budgets. Because the contract term does not line up exactly with the fiscal year, like it used to, more of the 75% remaining would fall into the MSRC's next Work Program than this Work Program. This is divided out proportionately according to the months and where they fall within those Work Programs. The total comes out to be \$224,700. The MSRC-TAC unanimously recommended approval of exercising the option.

ON MOTION BY MSRC MEMBER GREG WINTERBOTTOM, AND SECONDED BY MSRC MEMBER ERIK WHITE, THE MSRC VOTED UNANIMOUSLY TO EXECUTE THE TWO-YEAR OPTION, TO EXTEND RAYMOND GORSKI'S TECHNICAL ADVISOR'S CONTRACT TERM TO SEPTEMBER 30, 2017 AND TO INCREASE THE CONTRACT AMOUNT BY \$299,600 FOR A NEW TOTAL CONTRACT AMOUNT NOT TO EXCEED \$594,300.

AYES: SALTARELLI, VERES, WHITE, WINTERBOTTOM, MCCALLON, RUSH.

NOES: NONE.

**ACTION:** Staff will include this item for consideration by the SCAQMD Board at its July 10, 2015 meeting.

**Agenda Item #9 – Consider Partnership with South Coast AQMD to Implement a Residential Electric Vehicle (EV) Charging Incentive Pilot Program**

This item is being pulled from the agenda by MSRC staff. Ray Gorski, MSRC Technical Advisor, reported that SCAQMD is looking at the overall program parameters for this residential EV charging incentive program and staff does not want to put the cart before the horse, so if there are any modifications to the implementation plan from the SCAQMD, staff will reflect them in the staff report to be provided at the next MSRC meeting.

MSRC Member Erik White asked if it will include a description summary of the existing EV supply equipment (EVSE) incentive programs that the utilities are offering and how this is going to complement those programs. Mr. Gorski replied that it should. One of the parameters that are included in the SCAQMD's program is to ensure that it is not duplicative of any other incentives available. Several months ago, staff provided to the MSRC a survey of what available incentives are of EVSE within the four-county region, and we have that in the form of a staff report. A copy will be provided to Mr. White.

Henry Hogo, Assistant DEO/Science and Technology Advancement, stated that the reason this item is being continued is that tomorrow the Technology Committee will be hearing this item and SCAQMD staff wanted to get some input from the Committee members themselves of how they want to see the program run and that way the specific program implementation can be crafted. That would be presented to Technology Committee next month and then to the SCAQMD September Board meeting.

**OTHER BUSINESS**

**Agenda Item #10 – Other Business**

Cynthia Ravenstein stated that it is proposed that the MSRC not meet in July. The MSRC members concurred. The next meeting of the MSRC will be on August 20, 2015.

**ADJOURNMENT**

THERE BEING NO FURTHER BUSINESS, THE MSRC MEETING  
ADJOURNED AT 2:17 P.M.

**NEXT MEETING:** Thursday, August 20, 2015, at 2 p.m., Room CC-8.





MSRC Agenda Item No. 3

**DATE:** August 20, 2015

**FROM:** Cynthia Ravenstein

**SUBJECT:** AB 2766 Contracts Administrator's Report

**SYNOPSIS:** This report covers key issues addressed by MSRC staff, status of open contracts, and administrative scope changes from May 28 to July 29, 2015.

**RECOMMENDATION:** Receive and file report

**WORK PROGRAM IMPACT:** None

**Contract Execution Status**

**2014-16 Work Program**

On December 5, 2014, the SCAQMD Governing Board approved an award under the AB118 Enhanced Fleet Maintenance Program. This contract is executed.

On June 5, 2015, the SCAQMD Governing Board approved two awards under the Event Center Transportation Program and one award to provide low-emission transportation services to the Special Olympics World Games. These contracts are undergoing internal review or with the prospective contractor for signature.

**2012-14 Work Program**

On April 5, 2013, the SCAQMD Governing Board approved three awards under the Event Center Transportation Program. These contracts are executed.

On July 5, 2013, the SCAQMD Governing Board approved an additional award to Orange County Transportation Authority under the Event Center Transportation Program. This contract is executed.

On September 6, 2013, the SCAQMD Governing Board approved an award to Transit Systems Unlimited under the Event Center Transportation Program. This contract is executed.

On November 1, 2013, the SCAQMD Governing Board approved two awards under the Event Center Transportation Program. These contracts are executed.

On December 6, 2013, the SCAQMD Governing Board approved 25 awards under the Local Government Match Program, 12 awards under the Alternative Fuel Infrastructure Program, one award under the Alternative Fuel School Bus Incentives Program, and one award under the Event Center Transportation Program. These contracts are with the prospective contractor for signature or executed.

On January 10, 2014, the SCAQMD Governing Board approved three awards under the Local Government Match Program, one award under the Alternative Fuel Infrastructure Program, and one award under the Alternative Fuel School Bus Incentives Program. These contracts are executed.

On February 7, 2014, the SCAQMD Governing Board approved two awards under the Local Government Match Program and one award under the Alternative Fuel Infrastructure Program. These contracts are executed.

On April 4, 2014, the SCAQMD Governing Board approved two awards under the Local Government Match Program and three awards under the Traffic Signal Synchronization Partnership Program. These contracts are executed.

On May 2, 2014, the SCAQMD Governing Board approved 12 awards under the Local Government Match Program. These contracts are awaiting responses from the prospective contractor, with the prospective contractor for signature, or executed.

On June 6, 2014, the SCAQMD Governing Board approved an award under the Traffic Signal Synchronization Partnership Program. This contract is executed.

On July 11, 2014, the SCAQMD Governing Board approved an award under the Traffic Signal Synchronization Partnership Program. This contract is executed.

On September 5, 2014, the SCAQMD Governing Board approved an award under the Event Center Transportation Program. This contract is executed.

On October 3, 2014, the SCAQMD Governing Board approved an award under the Alternative Fuel Infrastructure Program. This contract is executed.

On December 5, 2014, the SCAQMD Governing Board approved 12 awards under the Alternative Fuel Infrastructure Program and two awards under the Event Center Transportation Program. These contracts are awaiting responses from the prospective contractor, with the prospective contractor for signature, or executed.

On February 6, 2015, the SCAQMD Governing Board approved 3 awards under the Alternative Fuel Infrastructure Program. These contracts are awaiting responses from the prospective contractor or executed.

#### **Work Program Status**

Contract Status Reports for work program years with open and pending contracts are attached. MSRC or MSRC-TAC members may request spreadsheets covering any other work program year.

***FY 2004-05 Work Program Contracts***

One contract from this work program year is open.

***FY 2004-05 Invoices Paid***

No invoices were paid during this period.

***FY 2005-06 Work Program Contracts***

3 contracts from this work program year are open; and 4 are in “Open/Complete” status, having completed all obligations save ongoing operation. One contract passed into Open/Complete status during this period: Los Angeles County Department of Public Works, Contract #ML06054 – Purchase Three CNG and Two LPG Heavy-Duty Trucks.

***FY 2005-06 Work Program Invoices Paid***

One invoice in the amount of \$125,000.00 was paid during this period.

***FY 2006-07 Work Program Contracts***

3 contracts from this work program year are open; and 15 are in “Open/Complete” status.

***FY 2006-07 Invoices Paid***

No invoices were paid during this period.

***FY 2007-08 Work Program Contracts***

10 contracts from this work program year are open; and 25 are in “Open/Complete” status. Two contracts closed during this period: Yosemite Waters, Contract #MS08015 – Purchase 11 LPG Heavy-Duty Vehicles; and City of Glendale, Contract #ML08037 – Purchase 13 CNG Heavy-Duty Vehicles.

***FY 2007-08 Invoices Paid***

One invoice in the amount of \$60,000.00 was paid during this period.

***FY 2008-09 Work Program Contracts***

6 contracts from this work program year are open; and 15 are in “Open/Complete” status.

***FY 2008-09 Invoices Paid***

No invoices were paid during this period.

***FY 2009-10 Work Program Contracts***

1 contract from this work program year is open; and 14 are in “Open/Complete” status. One contract was cancelled during this period: Domestic Linen Supply Company, Contract #MS10005 – Purchase 5 Gas-Electric Hybrid Vehicles. The award amount reverted to the AB 2766 Discretionary Fund.

***FY 2009-10 Invoices Paid***

One invoice in the amount of \$37,955.00 was paid during this period.

***FY 2010-11 Work Program Contracts***

30 contracts from this work program year are open; and 23 are in “Open/Complete” status. One contract closed during this period: Baumot North America, LLC, Contract #MS11082 – Retrofit Four Off-Road Vehicles. One contract passed into “Open/Complete” status during this

period: County of Los Angeles Department of Public Works, Contract #ML11025 – Purchase 5 Natural Gas Heavy-Duty Vehicles. One proposed contract with the Los Angeles Unified School District is still with them for signature following MSRC approval of modifications.

*FY 2010-11 Invoices Paid*

3 invoices totaling \$491,788.00 were paid during this period.

***FY 2011-12 Work Program Contracts***

42 contracts from this work program year are open, and 20 are in “Open/Complete” status. 5 contracts passed into “Open/Complete” status during this period: City of Los Angeles, Department of General Services – Purchase 15 Natural Gas Heavy-Duty Vehicles; City of La Puente, Contract #ML12022 – Purchase Two Natural Gas Medium-Duty and Three LPG Heavy-Duty Vehicles; Community Action Partnership of Orange County, Contract #MS12029 – Purchase One Medium-Heavy-Duty Vehicle; 99 Cents Only Stores, Contract #MS12072 – Install New CNG Station; and City of Los Angeles Bureau of Sanitation, Contract #MS12082 – Install New CNG Station.

*FY 2011-12 Invoices Paid*

Five invoices totaling \$326,339.52 were paid during this period.

***FYs 2012-14 Work Program Contracts***

54 contracts from this work program year are open, and one is in “Open/Complete” status. 3 contracts closed during this period: City of Palm Springs, Contract #ML14011 – Install Bicycle Racks and Implement Bicycle Outreach & Education; A-Z Bus Sales, Inc., Contract #MS14009 – Alternative Fuel School Bus Incentives; and BusWest, Contract #MS14048 – Alternative Fuel School Bus Incentives.

*FYs 2012-14 Invoices Paid*

4 invoices totaling \$365,622.94 were paid during this period.

***FYs 2014-16 Work Program Contracts***

One contract from this work program year is open.

*FYs 2014-16 Invoices Paid*

One invoice in the amount of \$40,001.00 was paid during this period.

***Administrative Scope Changes***

Two administrative scope changes were initiated during the period of May 28 to July 29, 2015:

- ML12019 – City of Palm Springs (EV Charging Infrastructure) – One-year no-cost term extension; as discussed under MSRC-TAC Agenda Item #5, this scope change was not executed
- ML14068 – City of South Pasadena (EV Charging Infrastructure) – Six-month no-cost term extension and clarify number of stations to be installed

**Attachments**

- FY 2004-05 through FYs 2014-16 Contract Status Reports



## AB2766 Discretionary Fund Program Invoices

May 28, 2015 to July 29, 2015

Contract Admin.	MSRC Chair	MSRC Liaison	Finance	Contract #	Contractor	Invoice #	Amount
<i>2005-2006 Work Program</i>							
6/9/2015	6/9/2015	6/9/2015	6/10/2015	ML06054	Los Angeles County Department of Public Work	150000146Fi	\$125,000.00
<b>Total: \$125,000.00</b>							
<i>2007-2008 Work Program</i>							
6/9/2015	6/19/2015	6/19/2015	6/23/2015	MS08018	Los Angeles County Department of Public Work	150000149-F	\$60,000.00
<b>Total: \$60,000.00</b>							
<i>2009-2010 Work Program</i>							
6/9/2015	6/19/2015	6/19/2015	6/23/2015	MS10015	County of Los Angeles Department of Public Wo	150000148-F	\$37,955.00
<b>Total: \$37,955.00</b>							
<i>2010-2011 Work Program</i>							
6/24/2015	7/9/2015	7/14/2015	7/14/2015	MS11086	DCL America Inc.	1000076608	\$175,538.00
6/9/2015	6/9/2015	6/9/2015	6/10/2015	ML11025	County of Los Angeles Department of Public Wo	150000147Fi	\$150,000.00
7/8/2015	7/9/2015	7/14/2015	7/14/2015	MS11071	City of Torrance Transit Department	015-0015357	\$166,250.00
<b>Total: \$491,788.00</b>							
<i>2011-2012 Work Program</i>							
6/17/2015	6/19/2015	6/19/2015	6/23/2015	MS12082	City of Los Angeles, Bureau of Sanitation	1-Final	\$175,000.00
7/23/2015	8/19/2015	8/19/2015	8/20/2015	MS12089	Riverside County Transportation Commission	00933	\$16,339.52
7/2/2015	7/9/2015	7/14/2015	7/14/2015	ML12022	City of La Puente	15-015-FINAL	\$10,000.00
7/7/2015	7/9/2015	7/14/2015	7/14/2015	MS12060	City of Santa Monica	1	\$25,000.00
7/9/2015	7/9/2015	7/14/2015	7/14/2015	MS12072	99 Cents Only Stores	99-100	\$100,000.00
<b>Total: \$326,339.52</b>							
<i>2012-2014 Work Program</i>							
7/2/2015	7/9/2015	7/14/2015	7/14/2015	ML14065	City of Orange	1 and Final	\$10,000.00
6/5/2015	6/9/2015	6/9/2015	6/10/2015	MS14007	Orange County Transportation Authority	R137287-Fin	\$189,622.94
6/10/2015	6/19/2015	6/19/2015	6/23/2015	MS14048	BusWest	BW005716	\$31,000.00
7/9/2015	7/9/2015	7/14/2015	7/14/2015	MS14045	TIMCO CNG Fund I, LLC	150505	\$135,000.00
<b>Total: \$365,622.94</b>							

<b>Contract Admin.</b>	<b>MSRC Chair</b>	<b>MSRC Liaison</b>	<b>Finance</b>	<b>Contract #</b>	<b>Contractor</b>	<b>Invoice #</b>	<b>Amount</b>
<i>2014-2016 Work Program</i>							
6/17/2015	6/19/2015	6/19/2015	6/23/2015	MS14089	Top Shelf Consulting, LLC	003	\$40,001.00

**Total: \$40,001.00**

**Total This Period: \$1,446,706.46**

## FYs 2004-05 Through 2014-16 AB2766 Contract Status Report

8/27/2015

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<b>FY 2004-2005 Contracts</b>									
<b>Open Contracts</b>									
ML05014	Los Angeles County Department of	5/21/2007	11/20/2008	3/20/2016	\$204,221.00	\$0.00	Traffic Signal Synchronization	\$204,221.00	No
<b>Total: 1</b>									
<b>Declined/Cancelled Contracts</b>									
ML05005	City of Highland				\$20,000.00	\$0.00	2 Medium Duty CNG Vehicles	\$20,000.00	No
ML05008	Los Angeles County Department of				\$140,000.00	\$0.00	7 Heavy Duty LPG Street Sweepers	\$140,000.00	No
ML05010	Los Angeles County Department of				\$20,000.00	\$0.00	1 Heavy Duty CNG Bus	\$20,000.00	No
MS05030	City of Inglewood				\$31,662.00	\$0.00	2 CNG Street Sweepers	\$31,662.00	No
MS05032	H&C Disposal				\$34,068.00	\$0.00	2 CNG Waste Haulers	\$34,068.00	No
MS05044	City of Colton				\$78,720.00	\$0.00	CNG Station Upgrade	\$78,720.00	No
<b>Total: 6</b>									
<b>Closed Contracts</b>									
ML05006	City of Colton Public Works	7/27/2005	7/26/2006		\$30,000.00	\$30,000.00	3 Medium Duty CNG Vehicles	\$0.00	Yes
ML05011	Los Angeles County Department of	8/10/2006	12/9/2007	6/9/2008	\$52,409.00	\$51,048.46	3 Heavy Duty LPG Shuttle Vans	\$1,360.54	Yes
ML05013	Los Angeles County Department of	1/5/2007	7/4/2008	1/4/2013	\$313,000.00	\$313,000.00	Traffic Signal Synchronization	\$0.00	Yes
ML05015	City of Lawndale	7/27/2005	7/26/2006		\$10,000.00	\$10,000.00	1 Medium Duty CNG Vehicle	\$0.00	Yes
ML05016	City of Santa Monica	9/23/2005	9/22/2006	9/22/2007	\$350,000.00	\$350,000.00	6 MD CNG Vehicles, 1 LPG Sweep, 13 CNG	\$0.00	Yes
ML05017	City of Signal Hill	1/16/2006	7/15/2007		\$126,000.00	\$126,000.00	Traffic Signal Synchronization	\$0.00	Yes
ML05018	City of San Bernardino	4/19/2005	4/18/2006		\$40,000.00	\$40,000.00	4 M.D. CNG Vehicles	\$0.00	Yes
ML05019	City of Lakewood	5/6/2005	5/5/2006		\$10,000.00	\$10,000.00	1 M.D. CNG Vehicle	\$0.00	Yes
ML05020	City of Pomona	6/24/2005	6/23/2006		\$10,000.00	\$10,000.00	1 M.D. CNG Vehicle	\$0.00	Yes
ML05021	City of Whittier	7/7/2005	7/6/2006	4/6/2008	\$100,000.00	\$80,000.00	Sweeper, Aerial Truck, & 3 Refuse Trucks	\$20,000.00	Yes
ML05022	City of Claremont	9/23/2005	9/22/2006		\$20,000.00	\$20,000.00	2 M.D. CNG Vehicles	\$0.00	Yes
ML05024	City of Cerritos	4/18/2005	3/17/2006		\$10,000.00	\$10,000.00	1 M.D. CNG Vehicle	\$0.00	Yes
ML05025	City of Malibu	5/6/2005	3/5/2006		\$10,000.00	\$10,000.00	1 Medium-Duty CNG Vehicle	\$0.00	Yes
ML05026	City of Inglewood	1/6/2006	1/5/2007	2/5/2009	\$60,000.00	\$60,000.00	2 CNG Transit Buses, 1 CNG Pothole Patch	\$0.00	Yes
ML05027	City of Beaumont	2/23/2006	4/22/2007	6/22/2010	\$20,000.00	\$20,000.00	1 H.D. CNG Bus	\$0.00	Yes
ML05028	City of Anaheim	9/8/2006	9/7/2007	5/7/2008	\$85,331.00	\$85,331.00	Traffic signal coordination & synchronization	\$0.00	Yes
ML05029	Los Angeles World Airports	5/5/2006	9/4/2007		\$140,000.00	\$140,000.00	Seven CNG Buses	\$0.00	Yes
ML05071	City of La Canada Flintridge	1/30/2009	1/29/2011		\$20,000.00	\$20,000.00	1 CNG Bus	\$0.00	Yes

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
ML05072	Los Angeles County Department of	8/24/2009	5/23/2010	1/23/2011	\$349,000.00	\$349,000.00	Traffic Signal Synchronization (LADOT)	\$0.00	Yes
MS05001	A-Z Bus Sales, Inc.	2/4/2005	12/31/2005	12/31/2006	\$1,385,000.00	\$1,385,000.00	CNG School Bus Buydown	\$0.00	Yes
MS05002	California Bus Sales	2/4/2005	12/31/2005	12/31/2006	\$1,800,000.00	\$1,800,000.00	CNG School Bus Buydown	\$0.00	Yes
MS05003	BusWest	1/28/2005	12/31/2005	12/31/2006	\$2,100,000.00	\$1,620,000.00	CNG School Bus Buydown	\$480,000.00	Yes
MS05004	Johnson/Ukropina Creative Marketin	11/27/2004	1/18/2006	4/18/2006	\$1,000,000.00	\$994,612.56	Implement "Rideshare Thursday" Campaign	\$5,387.44	Yes
MS05031	City of Ontario, Housing & Municipal	7/22/2005	3/21/2007		\$191,268.00	\$191,268.00	11 CNG Waste Haulers	\$0.00	Yes
MS05033	Waste Management of the Desert	9/26/2005	5/25/2007		\$202,900.00	\$202,900.00	10 CNG Waste Haulers	\$0.00	Yes
MS05034	Sukut Equipment, Inc.	9/9/2005	5/8/2007		\$1,151,136.00	\$1,151,136.00	Repower 12 Scrapers	\$0.00	Yes
MS05035	Varner Construction Inc.	11/28/2005	4/27/2007	2/27/2008	\$334,624.00	\$334,624.00	Repower 5 Off-Road H.D. Vehicles	\$0.00	Yes
MS05036	Camarillo Engineering	8/18/2005	1/17/2007		\$1,167,276.00	\$1,167,276.00	Repower 12 Scrapers	\$0.00	Yes
MS05037	Road Builders, Inc.	11/21/2005	4/20/2007	6/20/2008	\$229,302.00	\$229,302.00	Repower 2 Scrapers	\$0.00	Yes
MS05038	SunLine Transit Agency	3/30/2006	9/29/2007		\$135,000.00	\$135,000.00	15 CNG Buses	\$0.00	Yes
MS05039	Los Angeles County MTA	4/28/2006	4/27/2008		\$405,000.00	\$405,000.00	75 CNG Buses	\$0.00	Yes
MS05040	Orange County Transportation Autho	3/23/2006	12/22/2007	6/22/2008	\$200,000.00	\$200,000.00	25 CNG Buses	\$0.00	Yes
MS05041	The Regents of the University of Cali	9/5/2006	8/4/2007	9/4/2008	\$15,921.00	\$15,921.00	CNG Station Upgrade	\$0.00	Yes
MS05042	City of Ontario, Housing & Municipal	11/21/2005	9/20/2006	7/20/2007	\$117,832.00	\$74,531.27	CNG Station Upgrade	\$43,300.73	Yes
MS05043	Whittier Union High School District	9/23/2005	7/22/2006		\$15,921.00	\$15,921.00	CNG Station Upgrade	\$0.00	Yes
MS05045	City of Covina	9/9/2005	7/8/2006		\$10,000.00	\$7,435.61	CNG Station Upgrade	\$2,564.39	Yes
MS05046	City of Inglewood	1/6/2006	5/5/2007		\$139,150.00	\$56,150.27	CNG Station Upgrade	\$82,999.73	Yes
MS05047	Orange County Transportation Autho	10/20/2005	10/19/2006	1/19/2007	\$75,563.00	\$75,563.00	CNG Station Upgrade	\$0.00	Yes
MS05048	City of Santa Monica	7/24/2006	11/23/2007		\$150,000.00	\$150,000.00	CNG Station Upgrade	\$0.00	Yes
MS05049	Omnitrans	9/23/2005	2/22/2007		\$25,000.00	\$7,250.00	CNG Station Upgrade	\$17,750.00	Yes
MS05050	Gateway Cities Council of Governme	12/21/2005	4/20/2010		\$1,464,839.00	\$1,464,838.12	Truck Fleet Modernization Program	\$0.88	Yes
MS05051	Jagur Tractor	1/16/2006	4/15/2007	10/15/2007	\$660,928.00	\$660,928.00	Repower 6 Scrapers	\$0.00	Yes
MS05052	Caufield Equipment, Inc.	8/3/2005	1/2/2007		\$478,000.00	\$478,000.00	Repower 4 Scrapers	\$0.00	Yes
MS05070	Haaland Internet Productions (HIP D	6/24/2005	5/31/2007	11/30/2011	\$100,715.00	\$92,458.24	Design, Host & Maintain MSRC Website	\$8,256.76	Yes

**Total: 44**

**Closed/Incomplete Contracts**

ML05007	Los Angeles County Dept of Beache	6/23/2006	6/22/2007	12/22/2007	\$50,000.00	\$0.00	5 Medium Duty CNG Vehicles	\$50,000.00	No
ML05009	Los Angeles County Department of	6/22/2006	12/21/2007	9/30/2011	\$56,666.00	\$0.00	2 Propane Refueling Stations	\$56,666.00	No
ML05012	Los Angeles County Department of	11/10/2006	5/9/2008	1/9/2009	\$349,000.00	\$0.00	Traffic Signal Synchronization (LADOT)	\$349,000.00	No
ML05023	City of La Canada Flintridge	3/30/2005	2/28/2006	8/28/2008	\$20,000.00	\$0.00	1 CNG Bus	\$20,000.00	No

**Total: 4**



Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
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### **FY 2005-2006 Contracts**

#### **Open Contracts**

ML06031	City of Inglewood	4/4/2007	6/3/2013	9/3/2015	\$150,000.00	\$65,602.40	Purchase 4 H-D LPG Vehicles & Install LPG	\$84,397.60	No
ML06035	City of Hemet, Public Works	11/10/2006	12/9/2012	1/9/2017	\$338,107.00	\$175,000.00	7 Nat Gas Trucks & New Nat Gas Infrastruct	\$163,107.00	No
ML06070	City of Colton	4/30/2008	2/28/2015	4/30/2015	\$50,000.00	\$0.00	Two CNG Pickups	\$50,000.00	No

**Total: 3**

#### **Declined/Cancelled Contracts**

ML06018	Los Angeles County Dept of Beache				\$375,000.00	\$0.00	New CNG Station & 2 CNG Dump Trucks	\$375,000.00	No
ML06019	Los Angeles County Dept of Beache				\$250,000.00	\$0.00	New CNG Station & 2 CNG Dump Trucks	\$250,000.00	No
ML06023	City of Baldwin Park	6/16/2006	9/15/2012		\$20,000.00	\$0.00	CNG Dump Truck	\$20,000.00	No
ML06024	City of Pomona	8/3/2007	7/2/2013	7/2/2014	\$286,450.00	\$0.00	New CNG Station	\$286,450.00	No
ML06030	City of Burbank	3/19/2007	9/18/2011		\$287,700.00	\$0.00	New CNG Fueling Station	\$287,700.00	No
ML06037	City of Lynwood				\$25,000.00	\$0.00	1 Nat Gas Dump Truck	\$25,000.00	No
ML06039	City of Inglewood	2/9/2007	2/8/2008	4/8/2011	\$50,000.00	\$0.00	Modify Maintenance Facility for CNG Vehicle	\$50,000.00	No
ML06055	City of Los Angeles, Dept. of Genera				\$125,000.00	\$0.00	5 Gas-Electric Hybrid Buses	\$125,000.00	No
ML06059	City of Fountain Valley				\$25,000.00	\$0.00	One H.D. CNG Truck	\$25,000.00	No
MS06009	Clean Energy Fuels Corp.	6/23/2006	12/22/2012		\$250,000.00	\$0.00	New CNG Station - Laguna Niguel	\$250,000.00	Yes
MS06040	Capistrano Unified School District				\$136,000.00	\$0.00	New CNG Fueling Station	\$136,000.00	No
MS06041	Clean Energy Fuels Corp.	12/1/2006	3/31/2013	6/18/2009	\$250,000.00	\$0.00	New CNG Station-Newport Beach	\$250,000.00	No
MS06046	City of Long Beach, Dept. of Public				\$250,000.00	\$0.00	LNG Fueling Station	\$250,000.00	No
MS06051	Menifee Union School District	3/2/2007	7/1/2014		\$150,000.00	\$0.00	CNG Fueling Station	\$150,000.00	No

**Total: 14**

#### **Closed Contracts**

ML06016	City of Whittier	5/25/2006	5/24/2012	11/24/2012	\$50,000.00	\$50,000.00	2 CNG Refuse Trucks	\$0.00	Yes
ML06017	City of Claremont	8/2/2006	4/1/2012		\$50,000.00	\$50,000.00	2 CNG Refuse Trucks	\$0.00	Yes
ML06020	Los Angeles Department of Water a	3/19/2007	9/18/2013	4/18/2014	\$25,000.00	\$25,000.00	CNG Aerial Truck	\$0.00	Yes
ML06021	Los Angeles World Airports	9/13/2006	5/12/2013		\$150,000.00	\$150,000.00	6 CNG Buses	\$0.00	Yes
ML06022	City of Los Angeles, Bureau of Sanit	5/4/2007	1/3/2014		\$1,250,000.00	\$1,250,000.00	50 LNG Refuse Trucks	\$0.00	Yes
ML06025	City of Santa Monica	1/5/2007	11/4/2012	12/14/2014	\$300,000.00	\$300,000.00	12 H.D. CNG Vehicles	\$0.00	Yes
ML06026	City of Cerritos	10/27/2006	9/26/2010		\$60,500.00	\$60,500.00	CNG Station Upgrade	\$0.00	Yes
ML06027	City of Redondo Beach	9/5/2006	5/4/2012	10/4/2012	\$50,000.00	\$50,000.00	2 Heavy-Duty CNG Trucks	\$0.00	Yes
ML06028	City of Pasadena	9/29/2006	11/28/2012	3/28/2014	\$245,000.00	\$245,000.00	New CNG Station & Maint. Fac. Upgrades	\$0.00	Yes
ML06029	City of Culver City Transportation De	9/29/2006	8/28/2012	12/28/2012	\$50,000.00	\$50,000.00	2 CNG Heavy-Duty Trucks	\$0.00	Yes
ML06032	City of Rancho Cucamonga	2/13/2007	3/12/2013	2/12/2014	\$237,079.00	\$237,079.00	New CNG Station & 2 CNG Dump Trucks	\$0.00	Yes
ML06033	City of Cathedral City	11/17/2006	12/16/2012	12/16/2013	\$125,000.00	\$125,000.00	5 Heavy-Duty CNG Trucks	\$0.00	Yes
ML06034	City of South Pasadena	9/25/2006	9/24/2012		\$16,422.42	\$16,422.42	2 Nat. Gas Transit Buses	\$0.00	Yes

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
ML06036	City of Riverside	3/23/2007	3/22/2013		\$200,000.00	\$200,000.00	8 Heavy-Duty Nat Gas Vehicles	\$0.00	Yes
ML06038	City of Los Angeles, Department of	5/21/2007	1/20/2014		\$625,000.00	\$625,000.00	25 CNG Street Sweepers	\$0.00	Yes
ML06044	City of Pomona	12/15/2006	3/14/2013		\$50,000.00	\$50,000.00	2 CNG Street Sweepers	\$0.00	Yes
ML06052	City of Hemet, Public Works	4/20/2007	2/19/2013		\$25,000.00	\$25,000.00	Purchase One CNG Dump Truck	\$0.00	Yes
ML06053	City of Burbank	5/4/2007	7/3/2013		\$125,000.00	\$125,000.00	Five Nat. Gas Refuse Trucks	\$0.00	Yes
ML06056	City of Los Angeles, Dept. of Genera	11/30/2007	11/29/2008		\$350,000.00	\$350,000.00	Maintenance Facility Mods.	\$0.00	Yes
ML06057	City of Rancho Cucamonga	8/28/2007	6/27/2013	8/27/2014	\$100,000.00	\$100,000.00	4 H.D. Nat. Gas Vehicles	\$0.00	Yes
ML06058	City of Santa Monica	7/12/2007	7/11/2013		\$149,925.00	\$0.00	3 H.D. CNG Trucks & CNG Fueling Station	\$149,925.00	No
ML06060	City of Temple City	6/12/2007	6/11/2013		\$31,885.00	\$0.00	Upgrade existing CNG infrastructure	\$31,885.00	No
ML06061	City of Chino Hills	4/30/2007	4/29/2013		\$25,000.00	\$25,000.00	One H.D. CNG Vehicle	\$0.00	Yes
ML06062	City of Redlands	5/11/2007	5/10/2013		\$100,000.00	\$100,000.00	4 H.D. LNG Vehicles	\$0.00	Yes
ML06063	City of Moreno Valley	3/23/2007	11/22/2012		\$25,000.00	\$25,000.00	One H.D. CNG Vehicle	\$0.00	Yes
ML06064	City of South Pasadena	1/25/2008	11/24/2013	11/24/2014	\$50,000.00	\$50,000.00	2 H.D. CNG Vehicles	\$0.00	Yes
ML06065	City of Walnut	6/29/2007	6/28/2013		\$44,203.00	\$44,203.00	Upgrade Existing CNG Infrastructure	\$0.00	Yes
ML06066	City of Ontario, Housing & Municipal	5/30/2007	1/29/2013		\$125,000.00	\$125,000.00	5 H.D. CNG Vehicles	\$0.00	Yes
ML06067	City of El Monte	3/17/2008	5/16/2014	11/16/2014	\$157,957.00	\$157,957.00	Upgrade existing CNG infrastructure	\$0.00	Yes
ML06068	City of Claremont	8/28/2007	6/27/2013		\$60,000.00	\$60,000.00	Expand existing CNG infrastructure	\$0.00	Yes
ML06069	City of Palos Verdes Estates	11/19/2007	11/18/2013		\$25,000.00	\$25,000.00	One H.D. CNG Vehicle	\$0.00	Yes
MS06001	Riverside County Transportation Co	8/3/2007	9/2/2011		\$825,037.00	\$825,037.00	New Freeway Service Patrol	\$0.00	Yes
MS06002	Orange County Transportation Autho	11/7/2007	11/6/2013		\$928,740.00	\$925,091.00	New Freeway Service Patrol	\$3,649.00	Yes
MS06003	San Bernardino Associated Govern	10/19/2006	6/18/2010		\$804,240.00	\$804,239.87	New Freeway Service Patrol	\$0.13	Yes
MS06004	Los Angeles County MTA	8/10/2006	7/9/2010		\$1,391,983.00	\$1,391,791.98	New Freeway Service Patrol	\$191.02	Yes
MS06010	US Airconditioning Distributors	12/28/2006	6/27/2012		\$83,506.00	\$83,506.00	New CNG Station - Industry	\$0.00	Yes
MS06011	County Sanitation Districts of L.A. C	6/1/2006	7/31/2012		\$150,000.00	\$150,000.00	New CNG Station - Carson	\$0.00	Yes
MS06012	Consolidated Disposal Service	7/14/2006	9/13/2012	9/13/2014	\$297,981.00	\$297,981.00	New LNG Station & Facility Upgrades	\$0.00	Yes
MS06042	Clean Energy Fuels Corp.	1/5/2007	1/4/2013		\$150,000.00	\$150,000.00	New CNG Station-Baldwin Park	\$0.00	Yes
MS06043X	Westport Fuel Systems, Inc.	2/3/2007	12/31/2010	9/30/2011	\$2,000,000.00	\$2,000,000.00	Advanced Natural Gas Engine Incentive Pro	\$0.00	Yes
MS06045	Orange County Transportation Autho	8/17/2007	12/16/2013		\$200,000.00	\$200,000.00	CNG Fueling Station/Maint. Fac. Mods	\$0.00	Yes
MS06047	Hemet Unified School District	9/19/2007	11/18/2013		\$125,000.00	\$125,000.00	CNG Refueling Station	\$0.00	Yes
MS06048	Newport-Mesa Unified School Distric	6/25/2007	8/24/2013	8/24/2014	\$50,000.00	\$50,000.00	CNG Fueling Station	\$0.00	Yes
MS06050	Rossmoor Pastries	1/24/2007	10/23/2012		\$18,750.00	\$14,910.50	CNG Fueling Station	\$3,839.50	Yes

**Total: 44**

**Open/Complete Contracts**

ML06054	Los Angeles County Department of	6/17/2009	6/16/2016		\$125,000.00	\$125,000.00	3 CNG & 2 LPG HD Trucks	\$0.00	Yes
ML06071	City of Santa Monica	6/13/2014		11/30/2016	\$149,925.00	\$149,925.00	3 H.D. CNG Trucks & CNG Fueling Station	\$0.00	Yes
MS06013	City of Commerce	1/9/2008	7/8/2014	7/8/2015	\$350,000.00	\$350,000.00	New L/CNG Station - Commerce	\$0.00	Yes
MS06049	Clean Energy Fuels Corp.	4/20/2007	7/19/2013	11/30/2015	\$250,000.00	\$228,491.18	CNG Fueling Station - L.B.P.D.	\$21,508.82	Yes

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
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### **FY 2006-2007 Contracts**

#### **Open Contracts**

ML07044	City of Santa Monica	9/8/2008	3/7/2015	3/7/2017	\$600,000.00	\$50,000.00	24 H.D. Nat. Gas Vehicles	\$550,000.00	No
MS07080	City of Los Angeles, Bureau of Sanit	10/31/2008	8/30/2010	8/28/2016	\$63,192.00	\$62,692.00	Off-Road Diesel Equipment Retrofit Program	\$500.00	No

**Total: 2**

#### **Declined/Cancelled Contracts**

ML07031	City of Santa Monica				\$180,000.00	\$0.00	Upgrade N.G. Station to Add Hythane	\$180,000.00	No
ML07032	City of Huntington Beach Public Wor				\$25,000.00	\$0.00	One H.D. CNG Vehicle	\$25,000.00	No
ML07035	City of Los Angeles, General Service				\$350,000.00	\$0.00	New CNG Refueling Station/Southeast Yard	\$350,000.00	No
ML07038	City of Palos Verdes Estates				\$25,000.00	\$0.00	One H.D. LPG Vehicle	\$25,000.00	No
MS07010	Palos Verdes Peninsula Transit Auth				\$80,000.00	\$0.00	Repower 4 Transit Buses	\$80,000.00	No
MS07014	Clean Energy Fuels Corp.				\$350,000.00	\$0.00	New L/CNG Station - SERRF	\$350,000.00	No
MS07015	Baldwin Park Unified School District				\$57,500.00	\$0.00	New CNG Station	\$57,500.00	No
MS07016	County of Riverside Fleet Services D				\$36,359.00	\$0.00	New CNG Station - Rubidoux	\$36,359.00	No
MS07017	County of Riverside Fleet Services D				\$33,829.00	\$0.00	New CNG Station - Indio	\$33,829.00	No
MS07018	City of Cathedral City				\$350,000.00	\$0.00	New CNG Station	\$350,000.00	No
MS07021	City of Riverside				\$350,000.00	\$0.00	New CNG Station	\$350,000.00	No
MS07050	Southern California Disposal Co.				\$320,000.00	\$0.00	Ten Nat. Gas Refuse Trucks	\$320,000.00	No
MS07062	Caltrans Division of Equipment				\$1,081,818.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$1,081,818.00	No
MS07065	ECCO Equipment Corp.				\$174,525.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$174,525.00	No
MS07067	Recycled Materials Company of Calif				\$99,900.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$99,900.00	No
MS07069	City of Burbank	5/9/2008	3/8/2010	9/8/2011	\$8,895.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$8,895.00	No
MS07074	Albert W. Davies, Inc.	1/25/2008	11/24/2009		\$39,200.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$39,200.00	No
MS07081	Clean Diesel Technologies, Inc.				\$240,347.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$240,347.00	No
MS07082	DCL International, Inc.				\$153,010.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$153,010.00	No
MS07083	Dinex Exhausts, Inc.				\$52,381.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$52,381.00	No
MS07084	Donaldson Company, Inc.				\$42,416.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$42,416.00	No
MS07085	Engine Control Systems Limited				\$155,746.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$155,746.00	No
MS07086	Huss, LLC				\$84,871.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$84,871.00	No
MS07087	Mann+Hummel GmbH				\$189,361.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$189,361.00	No
MS07088	Nett Technologies, Inc.				\$118,760.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$118,760.00	No
MS07089	Rypos, Inc.				\$68,055.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$68,055.00	No
MS07090	Sud-Chemie				\$27,345.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$27,345.00	No

**Total: 27**

#### **Closed Contracts**

ML07025	City of San Bernardino	8/12/2008	7/11/2010		\$350,000.00	\$350,000.00	Maintenance Facility Modifications	\$0.00	Yes
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Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
ML07026	City of South Pasadena	6/13/2008	6/12/2014		\$25,000.00	\$25,000.00	One H.D. CNG Vehicle	\$0.00	Yes
ML07027	Los Angeles World Airports	6/3/2008	7/2/2014		\$25,000.00	\$25,000.00	One H.D. LNG Vehicle	\$0.00	Yes
ML07028	City of Los Angeles, General Service	3/13/2009	3/12/2014		\$350,000.00	\$350,000.00	New CNG Refueling Station/Hollywood Yard	\$0.00	Yes
ML07029	City of Los Angeles, General Service	3/13/2009	3/12/2014		\$350,000.00	\$350,000.00	New CNG Refueling Station/Venice Yard	\$0.00	Yes
ML07033	City of La Habra	5/21/2008	6/20/2014	11/30/2013	\$25,000.00	\$25,000.00	One H.D. Nat Gas Vehicle	\$0.00	Yes
ML07034	City of Los Angeles, General Service	3/13/2009	3/12/2014		\$350,000.00	\$350,000.00	New CNG Refueling Station/Van Nuys Yard	\$0.00	Yes
ML07036	City of Alhambra	1/23/2009	2/22/2015		\$50,000.00	\$50,000.00	2 H.D. CNG Vehicles	\$0.00	Yes
ML07039	City of Baldwin Park	6/6/2008	6/5/2014	8/5/2015	\$50,000.00	\$50,000.00	Two N.G. H.D. Vehicles	\$0.00	Yes
ML07040	City of Moreno Valley	6/3/2008	9/2/2014		\$25,000.00	\$25,000.00	One Heavy-Duty CNG Vehicle	\$0.00	Yes
ML07041	City of La Quinta	6/6/2008	6/5/2014		\$25,000.00	\$25,000.00	One CNG Street Sweeper	\$0.00	Yes
ML07042	City of La Quinta	8/15/2008	9/14/2010		\$100,000.00	\$100,000.00	Street Sweeping Operations	\$0.00	Yes
ML07046	City of Culver City Transportation De	5/2/2008	5/1/2014		\$25,000.00	\$25,000.00	One H.D. Nat. Gas Vehicle	\$0.00	Yes
ML07047	City of Cathedral City	6/16/2008	9/15/2014	3/15/2015	\$225,000.00	\$225,000.00	Two H.D. Nat. Gas Vehicles/New CNG Fueli	\$0.00	Yes
ML07048	City of Cathedral City	9/19/2008	10/18/2010		\$100,000.00	\$84,972.45	Street Sweeping Operations	\$15,027.55	Yes
MS07001	A-Z Bus Sales, Inc.	12/28/2006	12/31/2007	2/29/2008	\$1,920,000.00	\$1,380,000.00	CNG School Bus Buydown	\$540,000.00	Yes
MS07002	BusWest	1/19/2007	12/31/2007	3/31/2008	\$840,000.00	\$840,000.00	CNG School Bus Buydown	\$0.00	Yes
MS07003	Westport Fuel Systems, Inc.	11/2/2007	12/31/2011	6/30/2013	\$1,500,000.00	\$1,499,990.00	Advanced Nat. Gas Engine Incentive Progra	\$10.00	Yes
MS07005	S-W Compressors	3/17/2008	3/16/2010		\$60,000.00	\$7,500.00	Mountain CNG School Bus Demo Program-	\$52,500.00	Yes
MS07006	Coachella Valley Association of Gov	2/28/2008	10/27/2008		\$400,000.00	\$400,000.00	Coachella Valley PM10 Reduction Street Sw	\$0.00	Yes
MS07007	Los Angeles World Airports	5/2/2008	11/1/2014		\$420,000.00	\$420,000.00	Purchase CNG 21 Transit Buses	\$0.00	Yes
MS07011	L A Service Authority for Freeway E	3/12/2010	5/31/2011	9/30/2011	\$700,000.00	\$700,000.00	"511" Commuter Services Campaign	\$0.00	Yes
MS07012	City of Los Angeles, General Service	6/13/2008	6/12/2009	6/12/2010	\$50,000.00	\$50,000.00	Maintenance Facility Modifications	\$0.00	Yes
MS07013	Rainbow Disposal Company, Inc.	1/25/2008	3/24/2014	9/24/2014	\$350,000.00	\$350,000.00	New High-Volume CNG Station	\$0.00	Yes
MS07019	City of Cathedral City	1/9/2009	6/8/2010		\$32,500.00	\$32,500.00	Maintenance Facility Modifications	\$0.00	Yes
MS07051	City of San Bernardino	8/12/2008	12/11/2014		\$480,000.00	\$480,000.00	15 Nat. Gas Refuse Trucks	\$0.00	Yes
MS07052	City of Redlands	7/30/2008	11/29/2014		\$160,000.00	\$160,000.00	Five Nat. Gas Refuse Trucks	\$0.00	Yes
MS07053	City of Claremont	7/31/2008	12/30/2014		\$96,000.00	\$96,000.00	Three Nat. Gas Refuse Trucks	\$0.00	Yes
MS07055	City of Culver City Transportation De	7/8/2008	9/7/2014		\$192,000.00	\$192,000.00	Six Nat. Gas Refuse Trucks	\$0.00	Yes
MS07056	City of Whittier	9/5/2008	3/4/2015		\$32,000.00	\$32,000.00	One Nat. Gas Refuse Trucks	\$0.00	Yes
MS07058	The Better World Group	11/17/2007	11/16/2009	11/16/2011	\$247,690.00	\$201,946.21	MSRC Programmatic Outreach Services	\$45,743.79	Yes
MS07059	County Sanitation Districts of L.A. C	9/5/2008	9/4/2010	7/14/2012	\$231,500.00	\$231,500.00	Off-Road Diesel Equipment Retrofit Program	\$0.00	Yes
MS07060	Community Recycling & Resource R	3/7/2008	1/6/2010	7/6/2011	\$177,460.00	\$98,471.00	Off-Road Diesel Equipment Retrofit Program	\$78,989.00	Yes
MS07061	City of Los Angeles, Department of	10/31/2008	8/30/2010	2/28/2013	\$40,626.00	\$40,626.00	Off-Road Diesel Equipment Retrofit Program	\$0.00	Yes
MS07063	Shimmick Construction Company, In	4/26/2008	2/25/2010	8/25/2011	\$80,800.00	\$11,956.37	Off-Road Diesel Equipment Retrofit Program	\$68,843.63	No
MS07064	Altfillisch Contractors, Inc.	9/19/2008	7/18/2010	1/18/2011	\$160,000.00	\$155,667.14	Off-Road Diesel Equipment Retrofit Program	\$4,332.86	Yes
MS07068	Sukut Equipment Inc.	1/23/2009	11/22/2010	5/22/2012	\$26,900.00	\$26,900.00	Off-Road Diesel Equipment Retrofit Program	\$0.00	Yes
MS07070	Griffith Company	4/30/2008	2/28/2010	8/28/2012	\$168,434.00	\$125,504.00	Off-Road Diesel Equipment Retrofit Program	\$42,930.00	Yes

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
MS07071	Tiger 4 Equipment Leasing	9/19/2008	7/18/2010	1/18/2013	\$210,937.00	\$108,808.97	Off-Road Diesel Equipment Retrofit Program	\$102,128.03	Yes
MS07072	City of Culver City Transportation De	4/4/2008	2/3/2010	8/3/2011	\$72,865.00	\$72,865.00	Off-Road Diesel Equipment Retrofit Program	\$0.00	Yes
MS07075	Dan Copp Crushing	9/17/2008	7/16/2010	1/16/2012	\$73,600.00	\$40,200.00	Off-Road Diesel Equipment Retrofit Program	\$33,400.00	No
MS07076	Reed Thomas Company, Inc.	8/15/2008	6/14/2010	3/14/2012	\$339,073.00	\$100,540.00	Off-Road Diesel Equipment Retrofit Program	\$238,533.00	No
MS07079	Riverside County Transportation Co	1/30/2009	7/29/2013	12/31/2011	\$20,000.00	\$15,165.45	BikeMetro Website Migration	\$4,834.55	Yes
MS07091	BusWest	10/16/2009	3/15/2010		\$33,660.00	\$33,660.00	Provide Lease for 2 CNG School Buses	\$0.00	Yes
MS07092	Riverside County Transportation Co	9/1/2010	10/31/2011		\$350,000.00	\$350,000.00	"511" Commuter Services Campaign	\$0.00	Yes

**Total: 45**

**Closed/Incomplete Contracts**

ML07045	City of Inglewood	2/6/2009	4/5/2015		\$75,000.00	\$25,000.00	3 H.D. Nat. Gas Vehicles	\$50,000.00	No
MS07004	BusWest	7/2/2007	7/1/2009		\$90,928.00	\$68,196.00	Provide Lease for 2 CNG School Buses	\$22,732.00	No
MS07066	Skanska USA Civil West California D	6/28/2008	4/27/2010	10/27/2010	\$111,700.00	\$36,128.19	Off-Road Diesel Equipment Retrofit Program	\$75,571.81	No
MS07073	PEED Equipment Co.	10/31/2008	8/30/2010		\$11,600.00	\$0.00	Off-Road Diesel Equipment Retrofit Program	\$11,600.00	No

**Total: 4**

**Open/Complete Contracts**

ML07023	City of Riverside	6/20/2008	10/19/2014	7/19/2016	\$462,500.00	\$461,476.42	CNG Station Expansion/Purch. 14 H.D. Vehi	\$1,023.58	No
ML07024	City of Garden Grove	3/7/2008	9/6/2014	7/6/2016	\$75,000.00	\$75,000.00	Three H.D. CNG Vehicles	\$0.00	Yes
ML07030	County of San Bernardino Public Wo	7/11/2008	9/10/2015		\$200,000.00	\$200,000.00	8 Natural Gas H.D. Vehicles	\$0.00	Yes
ML07037	City of Los Angeles, General Service	10/8/2008	10/7/2015		\$255,222.00	\$255,222.00	Upgrade LNG/LCNG Station/East Valley Yar	\$0.00	Yes
ML07043	City of Redondo Beach	9/28/2008	7/27/2014	10/27/2016	\$125,000.00	\$125,000.00	Five H.D. CNG Transit Vehicles	\$0.00	Yes
MS07008	City of Los Angeles, Department of T	9/18/2009	5/17/2020	9/17/2017	\$1,900,000.00	\$1,900,000.00	Purchase 95 Transit Buses	\$0.00	Yes
MS07009	Orange County Transportation Autho	5/14/2008	4/13/2016		\$800,000.00	\$800,000.00	Purchase 40 Transit Buses	\$0.00	Yes
MS07020	Avery Petroleum	5/20/2009	7/19/2015		\$250,000.00	\$250,000.00	New CNG Station	\$0.00	Yes
MS07022	CSULA Hydrogen Station and Resea	10/30/2009	12/29/2015	10/29/2019	\$250,000.00	\$250,000.00	New Hydrogen Fueling Station	\$0.00	Yes
MS07049	Palm Springs Disposal Services	10/23/2008	11/22/2014	9/22/2016	\$96,000.00	\$96,000.00	Three Nat. Gas Refuse Trucks	\$0.00	Yes
MS07054	Republic Services, Inc.	3/7/2008	9/6/2014	9/6/2016	\$1,280,000.00	\$1,280,000.00	40 Nat. Gas Refuse Trucks	\$0.00	Yes
MS07057	CR&R, Inc.	7/31/2008	8/30/2014	6/30/2015	\$896,000.00	\$896,000.00	28 Nat. Gas Refuse Trucks	\$0.00	No
MS07077	USA Waste of California, Inc.	5/1/2009	12/31/2014		\$160,000.00	\$160,000.00	Five Nat. Gas Refuse Trucks (Santa Ana)	\$0.00	Yes
MS07078	USA Waste of California, Inc.	5/1/2009	12/31/2014	12/31/2015	\$256,000.00	\$256,000.00	Eight Nat. Gas Refuse Trucks (Dewey's)	\$0.00	Yes

**Total: 14**

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
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### ***FY 2007-2008 Contracts***

#### ***Open Contracts***

ML08028	City of Santa Monica	9/11/2009	9/10/2016	5/10/2019	\$600,000.00	\$0.00	24 CNG Heavy-Duty Vehicles	\$600,000.00	No
ML08030	City of Azusa	5/14/2010	3/13/2016		\$25,000.00	\$0.00	1 CNG Heavy-Duty Vehicle	\$25,000.00	No
ML08040	City of Riverside	9/11/2009	9/10/2016	3/10/2019	\$455,500.00	\$28,124.80	16 CNG Vehicles, Expand CNG Station & M	\$427,375.20	No
ML08043	City of Desert Hot Springs	9/25/2009	3/24/2016		\$25,000.00	\$0.00	1 CNG Heavy-Duty Vehicle	\$25,000.00	No
MS08007	United Parcel Service West Region	12/10/2008	10/9/2014	4/9/2019	\$300,000.00	\$0.00	10 H.D. Nat. Gas Vehicles	\$300,000.00	No
MS08013	United Parcel Service West Region	12/10/2008	10/9/2014	3/9/2019	\$480,000.00	\$216,000.00	12 H.D. Nat. Gas Yard Tractors	\$264,000.00	No
MS08058	Clean Energy Fuels Corp.	11/26/2009	3/25/2016	3/25/2017	\$400,000.00	\$320,000.00	New CNG Station - Ontario Airport	\$80,000.00	No
MS08068	Regents of the University of Californi	11/5/2010	11/4/2017	11/4/2019	\$400,000.00	\$0.00	Hydrogen Station	\$400,000.00	No

**Total: 8**

#### ***Declined/Cancelled Contracts***

ML08032	City of Irvine	5/1/2009	8/31/2010		\$9,000.00	\$0.00	36 Vehicles (Diagnostic)	\$9,000.00	No
ML08041	City of Los Angeles, Dept of Transpo	8/6/2010	7/5/2011	12/5/2011	\$8,800.00	\$0.00	73 Vehicles (Diagnostic)	\$8,800.00	No
ML08049	City of Cerritos	3/20/2009	1/19/2015	2/19/2017	\$25,000.00	\$0.00	1 CNG Heavy-Duty Vehicle	\$25,000.00	No
ML08051	City of Colton				\$75,000.00	\$0.00	3 CNG Heavy-Duty Vehicles	\$75,000.00	No
MS08002	Orange County Transportation Autho				\$1,500,000.00	\$0.00	Big Rig Freeway Service Patrol	\$1,500,000.00	No
MS08008	Diversified Truck Rental & Leasing				\$300,000.00	\$0.00	10 H.D. Nat. Gas Vehicles	\$300,000.00	No
MS08010	Orange County Transportation Autho				\$10,000.00	\$0.00	20 H.D. Nat. Gas Vehicles	\$10,000.00	No
MS08011	Green Fleet Systems, LLC				\$10,000.00	\$0.00	30 H.D. Nat. Gas Vehicles	\$10,000.00	No
MS08052	Burrtec Waste Industries, Inc.	12/24/2008	11/23/2014	11/23/2015	\$100,000.00	\$0.00	New CNG Station - Fontana	\$100,000.00	No
MS08054	Clean Energy Fuels Corp.				\$400,000.00	\$0.00	New LNG Station - Fontana	\$400,000.00	No
MS08055	Clean Energy Fuels Corp.	11/26/2009	3/25/2016	3/25/2017	\$400,000.00	\$0.00	New LNG Station - Long Beach-Pier S	\$400,000.00	No
MS08059	Burrtec Waste Industries, Inc.	12/24/2008	11/23/2014		\$100,000.00	\$0.00	New CNG Station - San Bernardino	\$100,000.00	No
MS08060	Burrtec Waste Industries, Inc.	12/24/2008	11/23/2014		\$100,000.00	\$0.00	New CNG Station - Azusa	\$100,000.00	No
MS08062	Go Natural Gas	9/25/2009	1/24/2016	1/24/2017	\$400,000.00	\$0.00	New CNG Station - Rialto	\$400,000.00	No
MS08074	Fontana Unified School District	11/14/2008	12/13/2014		\$200,000.00	\$0.00	Expansion of Existing CNG station	\$200,000.00	No
MS08077	Hythane Company, LLC				\$144,000.00	\$0.00	Upgrade Station to Hythane	\$144,000.00	No

**Total: 16**

#### ***Closed Contracts***

ML08023	City of Villa Park	11/7/2008	10/6/2012		\$6,500.00	\$5,102.50	Upgrade of Existing Refueling Facility	\$1,397.50	Yes
ML08027	Los Angeles County Department of	7/20/2009	1/19/2011	1/19/2012	\$6,901.00	\$5,124.00	34 Vehicles (Diagnostic)	\$1,777.00	No
ML08029	City of Gardena	3/19/2009	1/18/2015		\$25,000.00	\$25,000.00	1 Propane Heavy-Duty Vehicle	\$0.00	Yes
ML08031	City of Claremont	3/27/2009	3/26/2013	3/26/2015	\$97,500.00	\$97,500.00	Upgrade of Existing CNG Station, Purchase	\$0.00	Yes
ML08033	County of San Bernardino Public Wo	4/3/2009	2/2/2010		\$14,875.00	\$14,875.00	70 Vehicles (Diagnostic)	\$0.00	Yes
ML08034	County of San Bernardino Public Wo	3/27/2009	7/26/2015		\$150,000.00	\$150,000.00	8 CNG Heavy-Duty Vehicles	\$0.00	Yes

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
ML08035	City of La Verne	3/6/2009	11/5/2009		\$11,925.00	\$11,925.00	53 Vehicles (Diagnostic)	\$0.00	Yes
ML08036	City of South Pasadena	5/12/2009	7/11/2013		\$169,421.00	\$169,421.00	New CNG Station	\$0.00	Yes
ML08037	City of Glendale	5/20/2009	5/19/2015		\$325,000.00	\$325,000.00	13 CNG Heavy-Duty Vehicles	\$0.00	Yes
ML08039	City of Rancho Palos Verdes	6/5/2009	8/4/2015		\$50,000.00	\$50,000.00	2 LPG Transit Buses	\$0.00	Yes
ML08044	City of Chino	3/19/2009	3/18/2015		\$25,000.00	\$25,000.00	1 CNG Heavy-Duty Vehicle	\$0.00	Yes
ML08045	City of Santa Clarita	2/20/2009	6/19/2010		\$3,213.00	\$3,150.00	14 Vehicles (Diagnostic)	\$63.00	Yes
ML08046	City of Paramount	2/20/2009	2/19/2015		\$25,000.00	\$25,000.00	1 CNG Heavy-Duty Vehicle	\$0.00	Yes
ML08047	City of Culver City Transportation De	5/12/2009	8/11/2015		\$150,000.00	\$150,000.00	6 CNG Heavy-Duty Vehicles	\$0.00	Yes
ML08048	City of Santa Clarita	2/20/2009	6/19/2015		\$25,000.00	\$25,000.00	1 CNG Heavy-Duty Vehicle	\$0.00	Yes
ML08080	City of Irvine	5/1/2009	5/31/2015		\$50,000.00	\$0.00	Two Heavy-Duty Nat. Gas Vehicles	\$50,000.00	No
MS08001	Los Angeles County MTA	12/10/2010	6/9/2014		\$1,500,000.00	\$1,499,999.66	Big Rig Freeway Service Patrol	\$0.34	Yes
MS08003	A-Z Bus Sales, Inc.	5/2/2008	12/31/2008	2/28/2009	\$1,480,000.00	\$1,400,000.00	Alternative Fuel School Bus Incentive Progr	\$80,000.00	Yes
MS08004	BusWest	5/2/2008	12/31/2008		\$1,440,000.00	\$1,440,000.00	Alternative Fuel School Bus Incentive Progr	\$0.00	Yes
MS08009	Los Angeles World Airports	12/24/2008	12/23/2014		\$870,000.00	\$870,000.00	29 H.D. Nat. Gas Vehicles	\$0.00	Yes
MS08015	Yosemite Waters	5/12/2009	5/11/2015		\$180,000.00	\$117,813.60	11 H.D. Propane Vehicles	\$62,186.40	Yes
MS08016	TransVironmental Solutions, Inc.	1/23/2009	12/31/2010	9/30/2011	\$227,198.00	\$80,351.34	Rideshare 2 School Program	\$146,846.66	Yes
MS08022	SunLine Transit Agency	12/18/2008	3/17/2015		\$311,625.00	\$311,625.00	15 CNG Buses	\$0.00	Yes
MS08056	Clean Energy Fuels Corp.	11/26/2009	2/25/2015		\$400,000.00	\$400,000.00	New LNG Station - POLB-Anah. & I	\$0.00	Yes
MS08057	Orange County Transportation Autho	5/14/2009	7/13/2015		\$400,000.00	\$400,000.00	New CNG Station - Garden Grove	\$0.00	Yes
MS08061	Clean Energy Fuels Corp.	12/4/2009	3/3/2015		\$400,000.00	\$400,000.00	New CNG Station - L.A.-La Cienega	\$0.00	Yes
MS08064	Hemet Unified School District	1/9/2009	3/8/2015		\$75,000.00	\$75,000.00	Expansion of Existing Infrastructure	\$0.00	Yes
MS08065	Pupil Transportation Cooperative	11/20/2008	7/19/2014		\$10,500.00	\$10,500.00	Existing CNG Station Modifications	\$0.00	Yes
MS08070	Clean Energy Fuels Corp.	11/26/2009	2/25/2015		\$400,000.00	\$400,000.00	New CNG Station - Paramount	\$0.00	Yes
MS08071	ABC Unified School District	1/16/2009	1/15/2015		\$63,000.00	\$63,000.00	New CNG Station	\$0.00	Yes
MS08072	Clean Energy Fuels Corp.	12/4/2009	3/3/2015		\$400,000.00	\$354,243.38	New CNG Station - Burbank	\$45,756.62	Yes
MS08073	Clean Energy Fuels Corp.	11/26/2009	2/25/2015		\$400,000.00	\$400,000.00	New CNG Station - Norwalk	\$0.00	Yes
MS08075	Disneyland Resort	12/10/2008	2/1/2015		\$200,000.00	\$200,000.00	Expansion of Existing CNG Infrastructure	\$0.00	Yes
MS09002	A-Z Bus Sales, Inc.	11/7/2008	12/31/2009	12/31/2010	\$2,520,000.00	\$2,460,000.00	Alternative Fuel School Bus Incentive Progr	\$60,000.00	No
MS09004	A-Z Bus Sales, Inc.	1/30/2009	3/31/2009		\$156,000.00	\$156,000.00	Alternative Fuel School Bus Incentive Progr	\$0.00	Yes
MS09047	BusWest	7/9/2010	12/31/2010	4/30/2011	\$480,000.00	\$480,000.00	Alternative Fuel School Bus Incentive Progr	\$0.00	Yes

**Total: 36**

**Closed/Incomplete Contracts**

ML08025	Los Angeles County Department of	10/30/2009	3/29/2011		\$75,000.00	\$0.00	150 Vehicles (Diagnostic)	\$75,000.00	No
MS08079	ABC Unified School District	1/16/2009	12/15/2009	12/15/2010	\$50,000.00	\$0.00	Maintenance Facility Modifications	\$50,000.00	No

**Total: 2**

**Open/Complete Contracts**

ML08024	City of Anaheim	7/9/2010	7/8/2017	1/8/2018	\$425,000.00	\$425,000.00	9 LPG Buses and 8 CNG Buses	\$0.00	No
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Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
ML08026	Los Angeles County Department of	7/20/2009	7/19/2016		\$250,000.00	\$250,000.00	10 LPG Heavy-Duty Vehicles	\$0.00	Yes
ML08038	Los Angeles Department of Water a	7/16/2010	7/15/2017		\$1,050,000.00	\$1,050,000.00	42 CNG Heavy-Duty Vehicles	\$0.00	Yes
ML08042	City of Ontario, Housing & Municipal	5/1/2009	1/31/2016		\$175,000.00	\$175,000.00	7 CNG Heavy-Duty Vehicles	\$0.00	Yes
ML08050	City of Laguna Beach Public Works	8/12/2009	4/11/2016	10/11/2016	\$75,000.00	\$75,000.00	3 LPG Trolleys	\$0.00	Yes
MS08005	Burrtec Waste Industries, Inc.	10/23/2008	11/22/2014	10/22/2015	\$450,000.00	\$450,000.00	15 H.D. Nat. Gas Vehicles - Azusa	\$0.00	Yes
MS08006	Burrtec Waste Industries, Inc.	10/23/2008	11/22/2014	10/22/2015	\$450,000.00	\$450,000.00	15 H.D. Nat. Gas Vehicles - Saugus	\$0.00	Yes
MS08012	California Cartage Company, LLC	12/21/2009	10/20/2015	4/20/2016	\$480,000.00	\$480,000.00	12 H.D. Nat. Gas Yard Tractors	\$0.00	Yes
MS08014	City of San Bernardino	12/5/2008	6/4/2015		\$390,000.00	\$360,000.00	13 H.D. Nat. Gas Vehicles	\$30,000.00	Yes
MS08017	Omnitrans	12/13/2008	12/12/2015	12/12/2016	\$900,000.00	\$900,000.00	30 CNG Buses	\$0.00	Yes
MS08018	Los Angeles County Department of	8/7/2009	10/6/2016	4/6/2018	\$60,000.00	\$60,000.00	2 CNG Vehicles	\$0.00	Yes
MS08019	Enterprise Rent-A-Car Company of L	2/12/2010	7/11/2016		\$300,000.00	\$300,000.00	10 CNG Vehicles	\$0.00	Yes
MS08020	Ware Disposal Company, Inc.	11/25/2008	2/24/2016		\$900,000.00	\$900,000.00	30 CNG Vehicles	\$0.00	Yes
MS08021	CalMet Services, Inc.	1/9/2009	1/8/2016	7/8/2016	\$900,000.00	\$900,000.00	30 CNG Vehicles	\$0.00	Yes
MS08053	City of Los Angeles, Bureau of Sanit	2/18/2009	12/17/2015		\$400,000.00	\$400,000.00	New LNG/CNG Station	\$0.00	Yes
MS08063	Go Natural Gas	9/25/2009	1/24/2016	1/24/2017	\$400,000.00	\$400,000.00	New CNG Station - Moreno Valley	\$0.00	Yes
MS08066	Clean Energy Fuels Corp.	11/26/2009	2/25/2015		\$400,000.00	\$400,000.00	New CNG Station - Palm Spring Airport	\$0.00	Yes
MS08067	Trillium CNG	3/19/2009	6/18/2015	6/18/2016	\$311,600.00	\$254,330.00	New CNG Station	\$57,270.00	Yes
MS08069	Perris Union High School District	6/5/2009	8/4/2015	8/4/2016	\$225,000.00	\$225,000.00	New CNG Station	\$0.00	Yes
MS08076	Azusa Unified School District	10/17/2008	11/16/2014	1/31/2017	\$172,500.00	\$172,500.00	New CNG station and maint. Fac. Modificati	\$0.00	Yes
MS08078	SunLine Transit Agency	12/10/2008	6/9/2015	2/9/2016	\$189,000.00	\$189,000.00	CNG Station Upgrade	\$0.00	Yes

**Total: 21**



Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<b>FY 2008-2009 Contracts</b>									
<b>Open Contracts</b>									
ML09010	City of Palm Springs	1/8/2010	2/7/2016		\$25,000.00	\$0.00	1 Nat. Gas Heavy-Duty Vehicle	\$25,000.00	No
ML09026	Los Angeles County Department of	10/15/2010	10/14/2017	4/14/2019	\$150,000.00	\$80,411.18	3 Off-Road Vehicles Repowers	\$69,588.82	No
ML09032	Los Angeles World Airports	4/8/2011	4/7/2018		\$175,000.00	\$0.00	7 Nat. Gas Heavy-Duty Vehicles	\$175,000.00	No
ML09033	City of Beverly Hills	3/4/2011	5/3/2017	5/3/2018	\$550,000.00	\$100,000.00	10 Nat. Gas Heavy-Duty Vehicles & CNG St	\$450,000.00	No
ML09036	City of Long Beach Fleet Services B	5/7/2010	5/6/2017	5/6/2020	\$875,000.00	\$525,000.00	Purchase 35 LNG Refuse Trucks	\$350,000.00	No
ML09047	Los Angeles County Department of	8/13/2014	8/12/2015	11/12/2015	\$400,000.00	\$0.00	Maintenance Facility Modifications	\$400,000.00	No
<b>Total: 6</b>									
<b>Declined/Cancelled Contracts</b>									
ML09017	County of San Bernardino Public Wo	1/28/2010	7/27/2016		\$200,000.00	\$0.00	8 Nat. Gas Heavy-Duty Vehicles	\$200,000.00	No
ML09018	Los Angeles Department of Water a	7/16/2010	9/15/2012		\$850,000.00	\$0.00	Retrofit 85 Off-Road Vehicles w/DECS	\$850,000.00	No
ML09019	City of San Juan Capistrano Public	12/4/2009	11/3/2010		\$10,125.00	\$0.00	Remote Vehicle Diagnostics/45 Vehicles	\$10,125.00	No
ML09022	Los Angeles County Department of				\$8,250.00	\$0.00	Remote Vehicle Diagnostics/15 Vehicles	\$8,250.00	No
ML09025	Los Angeles County Department of	10/15/2010	12/14/2012	6/14/2013	\$50,000.00	\$0.00	Remote Vehicle Diagnostics/85 Vehicles	\$50,000.00	No
ML09028	Riverside County Waste Manageme				\$140,000.00	\$0.00	Retrofit 7 Off-Road Vehicles w/DECS	\$140,000.00	No
ML09039	City of Inglewood				\$310,000.00	\$0.00	Purchase 12 H.D. CNG Vehicles and Remot	\$310,000.00	No
ML09040	City of Cathedral City				\$83,125.00	\$0.00	Purchase 3 H.D. CNG Vehicles and Remote	\$83,125.00	No
ML09044	City of San Dimas				\$425,000.00	\$0.00	Install CNG Station and Purchase 1 CNG S	\$425,000.00	No
ML09045	City of Orange				\$125,000.00	\$0.00	Purchase 5 CNG Sweepers	\$125,000.00	No
MS09003	FuelMaker Corporation				\$296,000.00	\$0.00	Home Refueling Apparatus Incentives	\$296,000.00	No
<b>Total: 11</b>									
<b>Closed Contracts</b>									
ML09007	City of Rancho Cucamonga	2/26/2010	4/25/2012		\$117,500.00	\$62,452.57	Maintenance Facility Modification	\$55,047.43	Yes
ML09013	City of Riverside Public Works	9/10/2010	12/9/2011	7/31/2013	\$144,470.00	\$128,116.75	Traffic Signal Synchr./Moreno Valley	\$16,353.25	Yes
ML09014	City of Riverside Public Works	9/10/2010	12/9/2011	7/31/2013	\$113,030.00	\$108,495.94	Traffic Signal Synchr./Corona	\$4,534.06	Yes
ML09015	City of Riverside Public Works	9/10/2010	12/9/2011	7/31/2013	\$80,060.00	\$79,778.52	Traffic Signal Synchr./Co. of Riverside	\$281.48	Yes
ML09016	County of San Bernardino Public Wo	1/28/2010	3/27/2014		\$50,000.00	\$50,000.00	Install New CNG Station	\$0.00	Yes
ML09020	County of San Bernardino	8/16/2010	2/15/2012		\$49,770.00	\$49,770.00	Remote Vehicle Diagnostics/252 Vehicles	\$0.00	Yes
ML09021	City of Palm Desert	7/9/2010	3/8/2012		\$39,450.00	\$38,248.87	Traffic Signal Synchr./Rancho Mirage	\$1,201.13	Yes
ML09024	Los Angeles County Department of	10/15/2010	12/14/2012	6/14/2013	\$400,000.00	\$0.00	Maintenance Facility Modifications	\$400,000.00	No
ML09027	Los Angeles County Department of	7/23/2010	3/22/2012	6/22/2012	\$150,000.00	\$150,000.00	Freeway Detector Map Interface	\$0.00	Yes
ML09030	City of Los Angeles GSD/Fleet Servi	6/18/2010	6/17/2011		\$22,310.00	\$22,310.00	Remote Vehicle Diagnostics/107 Vehicles	\$0.00	No
ML09034	City of La Palma	11/25/2009	6/24/2015		\$25,000.00	\$25,000.00	1 LPG Heavy-Duty Vehicle	\$0.00	Yes
MS09001	Administrative Services Co-Op/Long	3/5/2009	6/30/2012	12/31/2013	\$225,000.00	\$150,000.00	15 CNG Taxicabs	\$75,000.00	Yes
MS09005	Gas Equipment Systems, Inc.	6/19/2009	10/18/2010		\$71,000.00	\$71,000.00	Provide Temp. Fueling for Mountain Area C	\$0.00	Yes

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<b>Total: 13</b>									
<b>Open/Complete Contracts</b>									
ML09008	City of Culver City Transportation De	1/19/2010	7/18/2016	7/18/2017	\$175,000.00	\$175,000.00	8 Nat. Gas Heavy-Duty Vehicles	\$0.00	No
ML09009	City of South Pasadena	11/5/2010	12/4/2016	3/4/2019	\$125,930.00	\$125,930.00	CNG Station Expansion	\$0.00	No
ML09011	City of San Bernardino	2/19/2010	5/18/2016		\$250,000.00	\$250,000.00	10 Nat. Gas Heavy-Duty Vehicles	\$0.00	Yes
ML09012	City of Gardena	3/12/2010	11/11/2015		\$25,000.00	\$25,000.00	1 Nat. Gas Heavy-Duty Vehicle	\$0.00	Yes
ML09023	Los Angeles County Department of	12/10/2010	12/9/2017		\$50,000.00	\$50,000.00	2 Heavy-Duty Alternative Fuel Transit Vehic	\$0.00	No
ML09029	City of Whittier	11/6/2009	4/5/2016		\$25,000.00	\$25,000.00	1 Nat. Gas Heavy-Duty Vehicle	\$0.00	Yes
ML09031	City of Los Angeles, Department of	10/29/2010	10/28/2017		\$825,000.00	\$825,000.00	33 Nat. Gas Heavy-Duty Vehicles	\$0.00	Yes
ML09035	City of Fullerton	6/17/2010	6/16/2017	12/16/2018	\$450,000.00	\$450,000.00	2 Heavy-Duty CNG Vehicles & Install CNG	\$0.00	Yes
ML09037	City of Redondo Beach	6/18/2010	6/17/2016		\$50,000.00	\$50,000.00	Purchase Two CNG Sweepers	\$0.00	Yes
ML09038	City of Chino	9/27/2010	5/26/2017		\$250,000.00	\$250,000.00	Upgrade Existing CNG Station	\$0.00	Yes
ML09041	City of Los Angeles, Bureau of Sanit	10/1/2010	9/30/2017		\$875,000.00	\$875,000.00	Purchase 35 H.D. Nat. Gas Vehicles	\$0.00	Yes
ML09042	Los Angeles Department of Water a	12/10/2010	12/9/2017		\$1,400,000.00	\$1,400,000.00	Purchase 56 Dump Trucks	\$0.00	Yes
ML09043	City of Covina	10/8/2010	4/7/2017	10/7/2018	\$179,591.00	\$179,591.00	Upgrade Existing CNG Station	\$0.00	Yes
ML09046	City of Newport Beach	5/20/2010	5/19/2016		\$162,500.00	\$162,500.00	Upgrade Existing CNG Station, Maintenance	\$0.00	Yes
<b>Total: 14</b>									

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
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## FY 2009-2010 Contracts

### Open Contracts

MS10015	County of Los Angeles Department o	3/14/2014	5/13/2016		\$37,955.00	\$37,955.00	Purchase 2 H.D. CNG Vehicles	\$0.00	No
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Total: 1

### Declined/Cancelled Contracts

MS10003	City of Sierra Madre	5/11/2012	3/10/2018		\$13,555.00	\$0.00	Purchase 1 H.D. CNG Vehicle	\$13,555.00	No
MS10005	Domestic Linen Supply Company, In	10/8/2010	7/7/2016		\$47,444.00	\$0.00	Purchase 5 Gas-Electric Hybrid Vehicles	\$47,444.00	No
MS10013	City of San Bernardino				\$68,834.00	\$0.00	Purchase 9 H.D. LNG Vehicles	\$68,834.00	No
MS10014	Serv-Wel Disposal				\$18,977.00	\$0.00	Purchase 2 H.D. CNG Vehicles	\$18,977.00	No
MS10018	Shaw Transport Inc.				\$81,332.00	\$0.00	Purchase 6 H.D. LNG Vehicles	\$81,332.00	No
MS10022	Los Angeles World Airports				\$123,353.00	\$0.00	Purchase 13 H.D. CNG Vehicles	\$123,353.00	No
MS10023	Dix Leasing				\$105,000.00	\$0.00	Purchase 3 H.D. LNG Vehicles	\$105,000.00	No

Total: 7

### Closed Contracts

MS10001	Los Angeles County MTA	3/19/2010	2/28/2011	4/28/2011	\$300,000.00	\$196,790.61	Clean Fuel Transit Bus Service to Dodger St	\$103,209.39	Yes
MS10002	Coachella Valley Association of Gov	6/18/2010	2/17/2011		\$400,000.00	\$400,000.00	Coachella Valley PM10 Reduction Street Sw	\$0.00	Yes
MS10025	Elham Shirazi	2/18/2011	10/17/2012	2/17/2014	\$199,449.00	\$188,413.05	Telework Demonstration Program	\$11,035.95	No

Total: 3

### Open/Complete Contracts

MS10004	Linde LLC	3/2/2012	6/1/2018		\$56,932.00	\$56,931.00	Purchase 6 H.D. CNG Vehicles	\$1.00	Yes
MS10006	Nationwide Environmental Services	11/19/2010	4/18/2017	9/18/2019	\$94,887.00	\$94,887.00	Purchase Three Street Sweepers	\$0.00	Yes
MS10007	Enterprise Rent-A-Car Company of L	7/15/2011	10/14/2017		\$18,976.00	\$18,976.00	Purchase 2 H.D. CNG Vehicles	\$0.00	No
MS10008	Republic Services, Inc.	12/10/2010	5/9/2017		\$123,354.00	\$123,354.00	Purchase 4 CNG Refuse Collection Vehicles	\$0.00	Yes
MS10009	Ware Disposal Company, Inc.	10/29/2010	3/28/2017		\$123,353.00	\$123,352.00	Purchase 4 CNG Refuse Trucks	\$1.00	No
MS10010	New Bern Transport Corporation	10/29/2010	3/28/2017		\$113,864.00	\$113,864.00	Repower 4 Heavy-Duty Vehicles	\$0.00	Yes
MS10011	Foothill Transit Agency	3/9/2012	2/8/2018		\$113,865.00	\$113,865.00	Purchase 12 H.D. CNG Vehicles	\$0.00	Yes
MS10012	Foothill Transit Agency	3/9/2012	3/8/2019		\$85,392.00	\$85,392.00	Purchase 9 H.D. Electric Vehicles	\$0.00	Yes
MS10016	Rio Hondo Community College	11/5/2010	5/4/2017		\$16,077.00	\$16,077.00	Purchase 1 CNG Shuttle Bus	\$0.00	Yes
MS10017	Ryder System Inc.	12/30/2011	6/29/2018	12/29/2018	\$651,377.00	\$651,377.00	Purchase 19 H.D. Natural Gas Vehicles	\$0.00	Yes
MS10019	EDCO Disposal Corporation	11/19/2010	2/18/2017		\$379,549.00	\$379,283.81	Purchase 11 H.D. CNG Refuse Trucks	\$265.19	Yes
MS10020	American Reclamation, Inc.	5/6/2011	2/5/2018		\$18,977.00	\$18,977.00	Purchase 1 H.D. CNG Vehicle	\$0.00	Yes
MS10021	City of Glendora	10/29/2010	11/28/2016		\$9,489.00	\$9,489.00	Purchase 1 H.D. CNG Vehicle	\$0.00	Yes
MS10024	Frito-Lay North America	7/29/2011	9/28/2017		\$47,444.00	\$47,444.00	Purchase 5 Electric Vehicles	\$0.00	Yes

Total: 14

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
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## FY 2010-2011 Contracts

### Open Contracts

ML11020	City of Indio	2/1/2013	3/31/2019	9/30/2019	\$30,000.00	\$0.00	Retrofit one H.D. Vehicles w/DECS, repower	\$30,000.00	No
ML11023	City of Rancho Cucamonga	4/20/2012	12/19/2018	9/19/2020	\$260,000.00	\$60,000.00	Expand Existing CNG Station, 2 H.D. Vehicl	\$200,000.00	No
ML11024	County of Los Angeles, Dept of Publi	12/5/2014	6/4/2022		\$90,000.00	\$0.00	Purchase 3 Nat. Gas H.D. Vehicles	\$90,000.00	No
ML11027	City of Los Angeles, Dept. of Genera	5/4/2012	7/3/2015	1/3/2016	\$300,000.00	\$0.00	Maintenance Facility Modifications	\$300,000.00	No
ML11029	City of Santa Ana	9/7/2012	3/6/2020		\$262,500.00	\$0.00	Expansion of Existing CNG Station, Install N	\$262,500.00	No
ML11032	City of Gardena	3/2/2012	9/1/2018	10/1/2020	\$102,500.00	\$0.00	Modify Maint. Facility, Expand CNG station,	\$102,500.00	No
ML11036	City of Riverside	1/27/2012	1/26/2019	3/26/2021	\$670,000.00	\$0.00	Install New CNG Station, Purchase 9 H.D. N	\$670,000.00	No
ML11038	City of Santa Monica	5/18/2012	7/17/2018		\$400,000.00	\$0.00	Maintenance Facility Modifications	\$400,000.00	No
ML11040	City of South Pasadena	5/4/2012	1/3/2019		\$30,000.00	\$0.00	Purchase 1 Nat. Gas H.D. Vehicle	\$30,000.00	No
ML11041	City of Santa Ana	9/7/2012	11/6/2018	5/6/2020	\$265,000.00	\$34,651.86	Purchase 7 LPG H.D. Vehicles, Retrofit 6 H.	\$230,348.14	No
ML11045	City of Newport Beach	2/3/2012	8/2/2018	8/2/2020	\$30,000.00	\$0.00	Purchase 1 Nat. Gas H.D. Vehicle	\$30,000.00	No
MS11001	Mineral LLC	4/22/2011	4/30/2013	4/30/2015	\$111,827.00	\$103,136.83	Design, Develop, Host and Maintain MSRC	\$8,690.17	No
MS11010	Border Valley Trading	8/26/2011	10/25/2017	4/25/2020	\$150,000.00	\$135,000.00	New LNG Station	\$15,000.00	No
MS11016	CR&R Incorporated	4/12/2013	10/11/2019		\$100,000.00	\$100,000.00	New CNG Station - Perris	\$0.00	No
MS11019	City of Corona	11/29/2012	4/28/2020		\$225,000.00	\$0.00	Expansion of Existing CNG Station	\$225,000.00	No
MS11056	The Better World Group	12/30/2011	12/29/2013	12/29/2015	\$206,836.00	\$170,805.96	Programmatic Outreach Services	\$36,030.04	No
MS11060	Rowland Unified School District	8/17/2012	1/16/2019	1/16/2020	\$175,000.00	\$175,000.00	New Limited Access CNG Station	\$0.00	No
MS11061	Eastern Municipal Water District	3/29/2012	5/28/2015		\$11,659.00	\$1,450.00	Retrofit One Off-Road Vehicle under Showc	\$10,209.00	No
MS11062	Load Center	9/7/2012	1/6/2016	12/6/2016	\$175,384.00	\$169,883.00	Retrofit Six Off-Road Vehicles under Showc	\$5,501.00	No
MS11065	Temecula Valley Unified School Distr	8/11/2012	1/10/2019		\$50,000.00	\$0.00	Expansion of Existing CNG Station	\$50,000.00	No
MS11067	City of Redlands	5/24/2012	11/23/2018	11/23/2019	\$85,000.00	\$0.00	Expansion of Existing CNG Station	\$85,000.00	No
MS11068	Ryder System Inc.	7/28/2012	10/27/2018		\$175,000.00	\$175,000.00	New Public Access L/CNG Station (Fontana	\$0.00	No
MS11069	Ryder System Inc.	7/28/2012	8/27/2018		\$175,000.00	\$175,000.00	New Public Access L/CNG Station (Orange)	\$0.00	No
MS11071	City of Torrance Transit Department	12/22/2012	1/21/2019	1/21/2020	\$175,000.00	\$166,250.00	New Limited Access CNG Station	\$8,750.00	No
MS11076	SA Recycling, LLC	5/24/2012	9/23/2015		\$424,801.00	\$0.00	Retrofit of 13 Off-Road Diesel Vehicles with	\$424,801.00	No
MS11081	Metropolitan Stevedore Company	9/7/2012	1/6/2016		\$45,416.00	\$0.00	Install DECS on Two Off-Road Vehicles	\$45,416.00	No
MS11085	City of Long Beach Fleet Services B	8/23/2013	12/22/2016		\$159,012.00	\$0.00	Retrofit Seven H.D. Off-Road Vehicles Unde	\$159,012.00	No
MS11086	DCL America Inc.	6/7/2013	10/6/2016		\$500,000.00	\$175,538.00	Retrofit Eight H.D. Off-Road Vehicles Under	\$324,462.00	No
MS11091	California Cartage Company, LLC	4/5/2013	8/4/2016	2/4/2018	\$55,000.00	\$0.00	Retrofit Two H.D. Off-Road Vehicles Under	\$55,000.00	No
MS11092	Griffith Company	2/15/2013	6/14/2016	12/14/2017	\$390,521.00	\$0.00	Retrofit 17 H.D. Off-Road Vehicles Under Sh	\$390,521.00	No

**Total: 30**

### Pending Execution Contracts

MS11073	Los Angeles Unified School District				\$175,000.00	\$0.00	Expansion of Existing CNG Station	\$175,000.00	No
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**Total: 1**

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<b>Declined/Cancelled Contracts</b>									
MS11013	Go Natural Gas, Inc.				\$150,000.00	\$0.00	New CNG Station - Huntington Beach	\$150,000.00	No
MS11014	Go Natural Gas, Inc.				\$150,000.00	\$0.00	New CNG Station - Santa Ana	\$150,000.00	No
MS11015	Go Natural Gas, Inc.				\$150,000.00	\$0.00	New CNG Station - Inglewood	\$150,000.00	No
MS11046	Luis Castro				\$40,000.00	\$0.00	Repower One Heavy-Duty Vehicle	\$40,000.00	No
MS11047	Ivan Borjas				\$40,000.00	\$0.00	Repower One Heavy-Duty Vehicle	\$40,000.00	No
MS11048	Phase II Transportation				\$1,080,000.00	\$0.00	Repower 27 Heavy-Duty Vehicles	\$1,080,000.00	No
MS11049	Ruben Caceras				\$40,000.00	\$0.00	Repower One Heavy-Duty Vehicle	\$40,000.00	No
MS11050	Carlos Arrue				\$40,000.00	\$0.00	Repower One Heavy-Duty Vehicle	\$40,000.00	No
MS11051	Francisco Vargas				\$40,000.00	\$0.00	Repower One Heavy-Duty Vehicle	\$40,000.00	No
MS11053	Jose Ivan Soltero				\$40,000.00	\$0.00	Repower One Heavy-Duty Vehicle	\$40,000.00	No
MS11054	Albino Meza				\$40,000.00	\$0.00	Repower One Heavy-Duty Vehicle	\$40,000.00	No
MS11059	Go Natural Gas				\$150,000.00	\$0.00	New Public Access CNG Station - Paramou	\$150,000.00	No
MS11063	Standard Concrete Products				\$310,825.00	\$0.00	Retrofit Two Off-Road Vehicles under Show	\$310,825.00	No
MS11070	American Honda Motor Company				\$100,000.00	\$0.00	Expansion of Existing CNG Station	\$100,000.00	No
MS11072	Trillium USA Company DBA Californi				\$150,000.00	\$0.00	New Public Access CNG Station	\$150,000.00	No
MS11077	DCL America Inc.				\$263,107.00	\$0.00	Retrofit of 13 Off-Road Diesel Vehicles with	\$263,107.00	No
MS11083	Catrac Construction, Inc.				\$500,000.00	\$0.00	Install DECS on Eight Off-Road Vehicles	\$500,000.00	No
MS11084	Ivanhoe Energy Services and Develo				\$66,750.00	\$0.00	Retrofit One H.D. Off-Road Vehicle Under S	\$66,750.00	No
MS11088	Diesel Emission Technologies				\$32,750.00	\$0.00	Retrofit Three H.D. Off-Road Vehicles Under	\$32,750.00	No
MS11089	Diesel Emission Technologies				\$9,750.00	\$0.00	Retrofit One H.D. Off-Road Vehicle Under S	\$9,750.00	No
MS11090	Diesel Emission Technologies				\$14,750.00	\$0.00	Retrofit One H.D. Off-Road Vehicle Under S	\$14,750.00	No

**Total: 21**

<b>Closed Contracts</b>									
ML11007	Coachella Valley Association of Gov	7/29/2011	7/28/2012		\$250,000.00	\$249,999.96	Regional PM10 Street Sweeping Program	\$0.04	Yes
ML11035	City of La Quinta	11/18/2011	11/17/2012		\$25,368.00	\$25,368.00	Retrofit 3 On-Road Vehicles w/DECS	\$0.00	Yes
MS11002	A-Z Bus Sales, Inc.	7/15/2011	12/31/2011	6/30/2013	\$1,705,000.00	\$1,705,000.00	Alternative Fuel School Bus Incentive Progr	\$0.00	Yes
MS11003	BusWest	7/26/2011	12/31/2011	12/31/2012	\$1,305,000.00	\$1,305,000.00	Alternative Fuel School Bus Incentive Progr	\$0.00	Yes
MS11004	Los Angeles County MTA	9/9/2011	2/29/2012		\$450,000.00	\$299,743.34	Clean Fuel Transit Service to Dodger Stadiu	\$150,256.66	Yes
MS11006	Orange County Transportation Autho	10/7/2011	2/29/2012	8/31/2012	\$268,207.00	\$160,713.00	MetroLink Service to Angel Stadium	\$107,494.00	Yes
MS11018	Orange County Transportation Autho	10/14/2011	1/31/2012		\$211,360.00	\$211,360.00	Express Bus Service to Orange County Fair	\$0.00	Yes
MS11052	Krisda Inc	9/27/2012	6/26/2013		\$120,000.00	\$120,000.00	Repower Three Heavy-Duty Vehicles	\$0.00	Yes
MS11057	Riverside County Transportation Co	7/28/2012	3/27/2013		\$100,000.00	\$89,159.40	Develop and Implement 511 "Smart Phone"	\$10,840.60	Yes
MS11058	L A Service Authority for Freeway E	5/31/2013	4/30/2014		\$123,395.00	\$123,395.00	Implement 511 "Smart Phone" Application	\$0.00	No
MS11074	SunLine Transit Agency	5/11/2012	7/31/2012		\$41,849.00	\$22,391.00	Transit Service for Coachella Valley Festival	\$19,458.00	Yes
MS11080	Southern California Regional Rail Au	4/6/2012	7/31/2012		\$26,000.00	\$26,000.00	MetroLink Service to Auto Club Speedway	\$0.00	Yes

**Total: 12**

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<b>Closed/Incomplete Contracts</b>									
MS11064	City of Hawthorne	7/28/2012	8/27/2018	8/27/2019	\$175,000.00	\$0.00	New Limited Access CNG Station	\$175,000.00	No
MS11082	Baumot North America, LLC	8/2/2012	12/1/2015		\$65,958.00	\$4,350.00	Install DECS on Four Off-Road Vehicles	\$61,608.00	Yes
<b>Total: 2</b>									
<b>Open/Complete Contracts</b>									
ML11021	City of Whittier	1/27/2012	9/26/2018	6/26/2019	\$210,000.00	\$210,000.00	Purchase 7 Nat. Gas H.D. Vehicles	\$0.00	No
ML11022	City of Anaheim	3/16/2012	7/15/2018		\$150,000.00	\$150,000.00	Purchase of 5 H.D. Vehicles	\$0.00	No
ML11025	County of Los Angeles Department o	3/14/2014	9/13/2021		\$150,000.00	\$150,000.00	Purchase 5 Nat. Gas H.D. Vehicles	\$0.00	Yes
ML11026	City of Redlands	3/2/2012	10/1/2018		\$90,000.00	\$90,000.00	Purchase 3 Nat. Gas H.D. Vehicles	\$0.00	Yes
ML11028	City of Glendale	1/13/2012	5/12/2018		\$300,000.00	\$300,000.00	Purchase 10 H.D. CNG Vehicles	\$0.00	Yes
ML11030	City of Fullerton	2/3/2012	3/2/2018		\$109,200.00	\$109,200.00	Purchase 2 Nat. Gas H.D. Vehicles, Retrofit	\$0.00	Yes
ML11031	City of Culver City Transportation De	12/2/2011	12/1/2018		\$300,000.00	\$300,000.00	Purchase 10 H.D. Nat. Gas Vehicles	\$0.00	Yes
ML11033	City of Los Angeles, Bureau of Sanit	3/16/2012	1/15/2019		\$1,080,000.00	\$1,080,000.00	Purchase 36 LNG H.D. Vehicles	\$0.00	Yes
ML11034	City of Los Angeles, Department of	5/4/2012	1/3/2019		\$630,000.00	\$630,000.00	Purchase 21 H.D. CNG Vehicles	\$0.00	No
ML11037	City of Anaheim	12/22/2012	12/21/2019		\$300,000.00	\$300,000.00	Purchase 12 Nat. Gas H.D. Vehicles	\$0.00	Yes
ML11039	City of Ontario, Housing & Municipal	1/27/2012	9/26/2018		\$180,000.00	\$180,000.00	Purchase 6 Nat. Gas H.D. Vehicles	\$0.00	Yes
ML11042	City of Chino	2/17/2012	4/16/2018		\$30,000.00	\$30,000.00	Purchase 1 Nat. Gas H.D. Vehicle, Repower	\$0.00	No
ML11043	City of Hemet Public Works	2/3/2012	2/2/2019		\$60,000.00	\$60,000.00	Purchase 2 H.D. Nat. Gas Vehicles	\$0.00	No
ML11044	City of Ontario, Housing & Municipal	1/27/2012	6/26/2019		\$400,000.00	\$400,000.00	Expand Existing CNG Station	\$0.00	Yes
MS11008	USA Waste of California, Inc.	10/24/2013	4/23/2020		\$125,000.00	\$125,000.00	Expansion of Existing LCNG Station	\$0.00	Yes
MS11009	USA Waste of California, Inc.	10/24/2013	4/23/2020		\$125,000.00	\$125,000.00	Expansion of Existing LCNG Station	\$0.00	Yes
MS11011	EDCO Disposal Corporation	12/30/2011	4/29/2019		\$100,000.00	\$100,000.00	New CNG Station - Signal Hill	\$0.00	Yes
MS11012	EDCO Disposal Corporation	12/30/2011	4/29/2019		\$100,000.00	\$100,000.00	New CNG Station - Buena Park	\$0.00	Yes
MS11017	CR&R, Inc.	3/2/2012	2/1/2018		\$100,000.00	\$100,000.00	Expansion of existing station - Garden Grov	\$0.00	Yes
MS11055	KEC Engineering	2/3/2012	8/2/2018	8/2/2019	\$200,000.00	\$200,000.00	Repower 5 H.D. Off-Road Vehicles	\$0.00	Yes
MS11066	Torrance Unified School District	11/19/2012	9/18/2018		\$42,296.00	\$42,296.00	Expansion of Existing CNG Station	\$0.00	Yes
MS11079	Bear Valley Unified School District	2/5/2013	10/4/2019		\$175,000.00	\$175,000.00	New Limited Access CNG Station	\$0.00	Yes
MS11087	Cemex Construction Material Pacific,	10/16/2012	2/15/2016		\$448,766.00	\$448,760.80	Retrofit 13 H.D. Off-Road Vehicles Under Sh	\$5.20	Yes
<b>Total: 23</b>									

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<b>FY 2011-2012 Contracts</b>									
<b>Open Contracts</b>									
ML12013	City of Pasadena	10/19/2012	3/18/2015	9/18/2015	\$200,000.00	\$0.00	Electric Vehicle Charging Infrastructure	\$200,000.00	No
ML12014	City of Santa Ana	11/8/2013	8/7/2020		\$384,000.00	\$4,709.00	9 H.D. Nat. Gas & LPG Trucks, EV Charging	\$379,291.00	No
ML12015	City of Fullerton	4/25/2013	11/24/2020		\$40,000.00	\$10,000.00	HD CNG Vehicle, Expand CNG Station	\$30,000.00	No
ML12016	City of Cathedral City	1/4/2013	10/3/2019		\$60,000.00	\$0.00	CNG Vehicle & Electric Vehicle Infrastructur	\$60,000.00	No
ML12017	City of Los Angeles, Bureau of Sanit	6/26/2013	5/25/2020	11/25/2021	\$950,000.00	\$0.00	32 H.D. Nat. Gas Vehicles	\$950,000.00	No
ML12018	City of West Covina	10/18/2013	10/17/2020		\$300,000.00	\$0.00	Expansion of Existing CNG Station	\$300,000.00	No
ML12019	City of Palm Springs	9/6/2013	7/5/2015		\$38,000.00	\$16,837.00	EV Charging Infrastructure	\$21,163.00	No
ML12041	City of Anaheim Public Utilities Depa	4/4/2014	11/3/2015		\$68,977.00	\$0.00	EV Charging Infrastructure	\$68,977.00	No
ML12043	City of Hemet	6/24/2013	9/23/2019		\$60,000.00	\$0.00	Two Heavy-Duty Nat. Gas Vehicles	\$60,000.00	No
ML12045	City of Baldwin Park DPW	2/14/2014	12/13/2020		\$400,000.00	\$0.00	Install New CNG Station	\$400,000.00	No
ML12046	City of Irvine	8/11/2013	3/10/2021		\$30,000.00	\$0.00	One Heavy-Duty Nat. Gas Vehicle	\$30,000.00	No
ML12048	City of La Palma	1/4/2013	11/3/2018		\$20,000.00	\$0.00	Two Medium-Duty LPG Vehicles	\$20,000.00	No
ML12049	City of Rialto Public Works	7/14/2014	9/13/2015		\$30,432.00	\$0.00	EV Charging Infrastructure	\$30,432.00	No
ML12051	City of Bellflower	2/7/2014	2/6/2016		\$270,000.00	\$0.00	EV Charging Infrastructure	\$270,000.00	No
ML12057	City of Coachella	8/28/2013	8/27/2019		\$57,456.00	\$0.00	Purchase One Nat. Gas H.D. Vehicle/Street	\$57,456.00	No
MS12001	Los Angeles County MTA	7/1/2012	4/30/2013		\$300,000.00	\$0.00	Clean Fuel Transit Service to Dodger Stadiu	\$300,000.00	No
MS12004	USA Waste of California, Inc.	10/24/2013	11/23/2019		\$175,000.00	\$0.00	Construct New Limited-Access CNG Station	\$175,000.00	No
MS12008	Bonita Unified School District	7/12/2013	12/11/2019		\$175,000.00	\$0.00	Construct New Limited-Acess CNG Station	\$175,000.00	No
MS12009	Sysco Food Services of Los Angeles	1/7/2014	4/6/2020		\$150,000.00	\$0.00	Construct New Public-Access CNG Station	\$150,000.00	No
MS12011	Southern California Gas Company	6/14/2013	6/13/2019	6/13/2020	\$150,000.00	\$0.00	Construct New Public-Access CNG Station -	\$150,000.00	No
MS12024	Southern California Gas Company	6/13/2013	12/12/2019		\$150,000.00	\$0.00	Construct New Public-Access CNG Station -	\$150,000.00	No
MS12027	C.V. Ice Company, Inc.	5/17/2013	11/16/2019		\$75,000.00	\$0.00	Purchase 3 Medium-Heavy Duty Vehicles	\$75,000.00	No
MS12031	Final Assembly, Inc.	11/2/2012	11/1/2018		\$100,000.00	\$29,201.40	Purchase 4 Medium-Heavy Duty Vehicles	\$70,798.60	No
MS12033	Mike Diamond/Phace Management	12/22/2012	12/21/2018	6/21/2021	\$500,000.00	\$21,735.00	Purchase 20 Medium-Heavy Duty Vehicles	\$478,265.00	No
MS12034	Ware Disposal Company, Inc.	11/2/2012	11/1/2018	11/1/2020	\$133,070.00	\$74,763.00	Purchase 8 Medium-Heavy Duty Vehicles	\$58,307.00	No
MS12060	City of Santa Monica	4/4/2014	8/3/2017		\$500,000.00	\$25,000.00	Transit-Oriented Bicycle Sharing Program	\$475,000.00	No
MS12061	Orange County Transportation Autho	3/14/2014	3/13/2017		\$224,000.00	\$114,240.00	Transit-Oriented Bicycle Sharing Program	\$109,760.00	No
MS12067	Leatherwood Construction, Inc.	11/8/2013	3/7/2017		\$122,719.00	\$0.00	Retrofit Six Vehicles w/DECS - Showcase III	\$122,719.00	No
MS12073	FirstCNG, LLC	7/27/2013	12/26/2019		\$150,000.00	\$135,000.00	Construct New CNG Station	\$15,000.00	No
MS12075	CR&R Incorporated	7/27/2013	1/26/2021		\$100,000.00	\$0.00	Expansion of Existing CNG Infrastructure	\$100,000.00	No
MS12077	City of Coachella	6/14/2013	6/13/2020		\$225,000.00	\$0.00	Construct New CNG Station	\$225,000.00	No
MS12078	Penske Truck Leasing Co., L.P.	1/7/2014	1/6/2016		\$75,000.00	\$0.00	Maintenance Facility Modifications - Vernon	\$75,000.00	No
MS12079	Penske Truck Leasing Co., L.P.	1/7/2014	1/6/2016		\$75,000.00	\$0.00	Maintenance Facility Modifications - Boyle H	\$75,000.00	No
MS12080	City of Pasadena	11/8/2013	8/7/2020	8/7/2021	\$225,000.00	\$0.00	Expansion of Existing CNG Infrastructure	\$225,000.00	No

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
MS12081	Penske Truck Leasing Co., L.P.	1/7/2014	1/6/2016		\$75,000.00	\$0.00	Maintenance Facility Modifications - Santa A	\$75,000.00	No
MS12083	Brea Olinda Unified School District	7/30/2015	2/29/2024		\$59,454.00	\$0.00	Install New CNG Infrastructure	\$59,454.00	No
MS12084	Airport Mobil Inc.	12/6/2013	5/5/2020		\$150,000.00	\$0.00	Install New CNG Infrastructure	\$150,000.00	No
MS12086	SuperShuttle International, Inc.	3/26/2013	3/25/2019		\$225,000.00	\$202,500.00	Purchase 23 Medium-Heavy Duty Vehicles	\$22,500.00	No
MS12087	Los Angeles County MTA	8/29/2013	11/28/2015		\$125,000.00	\$125,000.00	Implement Rideshare Incentives Program	\$0.00	Yes
MS12088	Orange County Transportation Autho	12/6/2013	3/5/2016		\$125,000.00	\$0.00	Implement Rideshare Incentives Program	\$125,000.00	No
MS12089	Riverside County Transportation Co	10/18/2013	9/17/2015		\$250,000.00	\$69,754.70	Implement Rideshare Incentives Program	\$180,245.30	No
MS12Hom	Mansfield Gas Equipment Systems				\$296,000.00	\$0.00	Home Refueling Apparatus Incentive Progra	\$296,000.00	No

**Total: 42**

#### Declined/Cancelled Contracts

ML12038	City of Long Beach Public Works				\$26,000.00	\$0.00	Electric Vehicle Charging Infrastructure	\$26,000.00	No
ML12040	City of Duarte Transit				\$30,000.00	\$0.00	One Heavy-Duty Nat. Gas Vehicle	\$30,000.00	No
ML12044	County of San Bernardino Public Wo				\$250,000.00	\$0.00	Install New CNG Station	\$250,000.00	No
ML12052	City of Whittier	3/14/2013	7/13/2019		\$165,000.00	\$0.00	Expansion of Existing CNG Station	\$165,000.00	No
ML12053	City of Mission Viejo				\$60,000.00	\$0.00	EV Charging Infrastructure	\$60,000.00	No
MS12007	WestAir Gases & Equipment				\$100,000.00	\$0.00	Construct New Limited-Acess CNG Station	\$100,000.00	No
MS12030	Complete Landscape Care, Inc.				\$150,000.00	\$0.00	Purchase 6 Medium-Heavy Duty Vehicles	\$150,000.00	No
MS12070	Valley Music Travel/CID Entertainme				\$99,000.00	\$0.00	Implement Shuttle Service to Coachella Mus	\$99,000.00	No

**Total: 8**

#### Closed Contracts

ML12021	City of Rancho Cucamonga	9/14/2012	1/13/2020		\$40,000.00	\$40,000.00	Four Medium-Duty Nat. Gas Vehicles	\$0.00	Yes
ML12023	County of Los Angeles Internal Servi	8/1/2013	2/28/2015		\$250,000.00	\$192,333.00	EV Charging Infrastructure	\$57,667.00	Yes
ML12037	Coachella Valley Association of Gov	3/14/2013	3/13/2014		\$250,000.00	\$250,000.00	Street Sweeping Operations	\$0.00	Yes
ML12050	City of Baldwin Park	4/25/2013	4/24/2014	10/24/2014	\$402,400.00	\$385,363.00	EV Charging Infrastructure	\$17,037.00	No
ML12054	City of Palm Desert	9/30/2013	2/28/2015		\$77,385.00	\$77,385.00	EV Charging Infrastructure	\$0.00	Yes
ML12056	City of Cathedral City	3/26/2013	5/25/2014		\$25,000.00	\$25,000.00	Regional Street Sweeping Program	\$0.00	Yes
ML12066	City of Manhattan Beach	1/7/2014	4/6/2015		\$5,900.00	\$5,900.00	Electric Vehicle Charging Infrastructure	\$0.00	Yes
MS12002	Orange County Transportation Autho	9/7/2012	4/30/2013		\$342,340.00	\$333,185.13	Express Bus Service to Orange County Fair	\$9,154.87	Yes
MS12003	Orange County Transportation Autho	7/20/2012	2/28/2013		\$234,669.00	\$167,665.12	Implement Metrolink Service to Angel Stadiu	\$67,003.88	Yes
MS12005	USA Waste of California, Inc.	10/19/2012	8/18/2013		\$75,000.00	\$75,000.00	Vehicle Maintenance Facility Modifications	\$0.00	Yes
MS12006	Waste Management Collection & Re	10/19/2012	8/18/2013		\$75,000.00	\$75,000.00	Vehicle Maintenance Facility Modifications	\$0.00	Yes
MS12012	Rim of the World Unified School Dist	12/20/2012	5/19/2014		\$75,000.00	\$75,000.00	Vehicle Maintenance Facility Modifications	\$0.00	Yes
MS12059	Orange County Transportation Autho	2/28/2013	12/27/2014		\$75,000.00	\$75,000.00	Maintenance Facilities Modifications	\$0.00	No
MS12062	Fraser Communications	12/7/2012	5/31/2014		\$998,669.00	\$989,218.49	Develop & Implement "Rideshare Thursday"	\$9,450.51	Yes
MS12064	Anaheim Transportation Network	3/26/2013	12/31/2014		\$127,296.00	\$56,443.92	Implement Anaheim Circulator Service	\$70,852.08	Yes
MS12065	Orange County Transportation Autho	7/27/2013	11/30/2013		\$43,933.00	\$14,832.93	Ducks Express Service to Honda Center	\$29,100.07	Yes
MS12068	Southern California Regional Rail Au	3/1/2013	9/30/2013		\$57,363.00	\$47,587.10	Implement Metrolink Service to Autoclub Sp	\$9,775.90	Yes



Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
MS12069	City of Irvine	8/11/2013	2/28/2014		\$45,000.00	\$26,649.41	Implement Special Transit Service to Solar	\$18,350.59	Yes
MS12076	City of Ontario, Housing & Municipal	3/8/2013	4/7/2015		\$75,000.00	\$75,000.00	Maintenance Facilities Modification	\$0.00	Yes
MS12085	Bear Valley Unified School District	4/25/2013	6/24/2014		\$75,000.00	\$75,000.00	Maintenance Facility Modifications	\$0.00	Yes

**Total: 20**

**Open/Complete Contracts**

ML12020	City of Los Angeles, Department of	9/27/2012	3/26/2019	3/26/2020	\$450,000.00	\$450,000.00	15 H.D. Nat. Gas Vehicles	\$0.00	Yes
ML12022	City of La Puente	12/6/2013	6/5/2020		\$110,000.00	\$110,000.00	2 Medium-Duty and Three Heavy-Duty CNG	\$0.00	Yes
ML12039	City of Redlands	2/8/2013	10/7/2019		\$90,000.00	\$90,000.00	Three Heavy-Duty Nat. Gas Vehicles	\$0.00	No
ML12042	City of Chino Hills	1/18/2013	3/17/2017		\$87,500.00	\$87,500.00	Expansion of Existing CNG Station	\$0.00	Yes
ML12047	City of Orange	2/1/2013	1/31/2019		\$30,000.00	\$30,000.00	One Heavy-Duty Nat. Gas Vehicle	\$0.00	No
ML12055	City of Manhattan Beach	3/1/2013	12/31/2018		\$10,000.00	\$10,000.00	One Medium-Duty Nat. Gas Vehicle	\$0.00	Yes
MS12010	Murrieta Valley Unified School Distric	4/5/2013	9/4/2019		\$242,786.00	\$242,786.00	Construct New Limited-Access CNG Station	\$0.00	No
MS12025	Silverado Stages, Inc.	11/2/2012	7/1/2018		\$150,000.00	\$150,000.00	Purchase Six Medium-Heavy Duty Vehicles	\$0.00	Yes
MS12026	U-Haul Company of California	3/14/2013	3/13/2019		\$500,000.00	\$353,048.26	Purchase 23 Medium-Heavy Duty Vehicles	\$146,951.74	Yes
MS12028	Dy-Dee Service of Pasadena, Inc.	12/22/2012	1/21/2019		\$45,000.00	\$40,000.00	Purchase 2 Medium-Duty and 1 Medium-He	\$5,000.00	Yes
MS12029	Community Action Partnership of Or	11/2/2012	11/1/2018		\$25,000.00	\$14,850.00	Purchase 1 Medium-Heavy Duty Vehicle	\$10,150.00	Yes
MS12032	Fox Transportation	12/14/2012	12/13/2018		\$500,000.00	\$500,000.00	Purchase 20 Medium-Heavy Duty Vehicles	\$0.00	Yes
MS12035	Disneyland Resort	1/4/2013	7/3/2019		\$25,000.00	\$18,900.00	Purchase 1 Medium-Heavy Duty Vehicle	\$6,100.00	Yes
MS12036	Jim & Doug Carter's Automotive/VS	1/4/2013	11/3/2018		\$50,000.00	\$50,000.00	Purchase 2 Medium-Heavy Duty Vehicles	\$0.00	Yes
MS12058	Krisda Inc	4/24/2013	1/23/2019		\$25,000.00	\$25,000.00	Repower One Heavy-Duty Off-Road Vehicle	\$0.00	Yes
MS12063	Custom Alloy Light Metals, Inc.	8/16/2013	2/15/2020		\$100,000.00	\$100,000.00	Install New Limited Access CNG Station	\$0.00	Yes
MS12071	Transit Systems Unlimited, Inc.	5/17/2013	12/16/2018		\$21,250.00	\$21,250.00	Expansion of Existing CNG Station	\$0.00	Yes
MS12072	99 Cents Only Stores	4/5/2013	9/4/2019		\$100,000.00	\$100,000.00	Construct New CNG Station	\$0.00	Yes
MS12074	Arcadia Unified School District	7/5/2013	9/4/2019		\$175,000.00	\$175,000.00	Expansion of Existing CNG Infrastructure	\$0.00	No
MS12082	City of Los Angeles, Bureau of Sanit	11/20/2013	2/19/2021		\$175,000.00	\$175,000.00	Install New CNG Infrastructure	\$0.00	Yes

**Total: 20**

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<b>FY 2012-2014 Contracts</b>									
<b>Open Contracts</b>									
ML14012	City of Santa Ana	2/13/2015	10/12/2021		\$244,000.00	\$0.00	EV Charging and 7 H.D. LPG Vehicles	\$244,000.00	No
ML14014	City of Torrance	9/5/2014	12/4/2019		\$56,000.00	\$0.00	EV Charging Infrastructure	\$56,000.00	No
ML14016	City of Anaheim	4/3/2015	9/2/2021		\$380,000.00	\$0.00	Purchase 2 H.D. Vehicles, Expansion of Exi	\$380,000.00	No
ML14018	City of Los Angeles, Department of	3/6/2015	9/5/2021		\$810,000.00	\$0.00	Purchase 27 H.D. Nat. Gas Vehicles	\$810,000.00	No
ML14019	City of Corona Public Works	12/5/2014	6/4/2020		\$178,263.00	\$0.00	EV Charging, Bicycle Racks, Bicycle Locker	\$178,263.00	No
ML14021	Riverside County Regional Park and	7/24/2014	12/23/2016		\$250,000.00	\$0.00	Bicycle Trail Improvements	\$250,000.00	No
ML14028	City of Fullerton	9/5/2014	1/4/2022		\$126,950.00	\$0.00	Expansion of Existing CNG Infrastructure	\$126,950.00	No
ML14029	City of Irvine	7/11/2014	6/10/2017		\$90,500.00	\$0.00	Bicycle Trail Improvements	\$90,500.00	No
ML14030	County of Los Angeles Internal Servi	1/9/2015	3/8/2018		\$425,000.00	\$0.00	Bicycle Racks, Outreach & Education	\$425,000.00	No
ML14031	Riverside County Waste Manageme	6/13/2014	12/12/2020		\$90,000.00	\$0.00	Purchase 3 H.D. CNG Vehicles	\$90,000.00	No
ML14032	City of Rancho Cucamonga	1/9/2015	1/8/2022		\$113,990.00	\$18,110.88	Expansion of Existing CNG Infrs., Bicycle L	\$95,879.12	No
ML14033	City of Irvine	7/11/2014	2/10/2021		\$60,000.00	\$0.00	Purchase 2 H.D. CNG Vehicles	\$60,000.00	No
ML14034	City of Lake Elsinore	9/5/2014	5/4/2021		\$56,700.00	\$0.00	EV Charging Stations	\$56,700.00	No
ML14049	City of Moreno Valley	7/11/2014	3/10/2021		\$105,000.00	\$30,000.00	One HD Nat Gas Vehicle, EV Charging, Bicy	\$75,000.00	No
ML14050	City of Yucaipa	7/11/2014	9/10/2015		\$84,795.00	\$0.00	Installation of Bicycle Lanes	\$84,795.00	No
ML14051	City of Brea	9/5/2014	1/4/2017		\$450,000.00	\$0.00	Installation of Bicycle Trail	\$450,000.00	No
ML14054	City of Torrance	11/14/2014	4/13/2017		\$350,000.00	\$0.00	Upgrade Maintenance Facility	\$350,000.00	No
ML14055	City of Highland	10/10/2014	3/9/2018		\$500,000.00	\$0.00	Bicycle Lanes and Outreach	\$500,000.00	No
ML14056	City of Redlands	9/5/2014	5/4/2016	5/4/2017	\$125,000.00	\$0.00	Bicycle Lanes	\$125,000.00	No
ML14062	City of San Fernando	3/27/2015	5/26/2021		\$387,091.00	\$0.00	Expand Existing CNG Fueling Station	\$387,091.00	No
ML14064	City of Claremont	7/11/2014	7/10/2020	1/10/2021	\$60,000.00	\$0.00	Purchase Two Heavy-Duty Nat. Gas Vehicle	\$60,000.00	No
ML14066	City of South Pasadena	9/12/2014	7/11/2016		\$142,096.00	\$0.00	Bicycle Trail Improvements	\$142,096.00	No
ML14068	City of South Pasadena	9/12/2014	10/11/2015		\$10,183.00	\$0.00	Electric Vehicle Charging Infrastructure	\$10,183.00	No
ML14071	City of Manhattan Beach	1/9/2015	11/8/2018		\$22,485.00	\$0.00	Electric Vehicle Charging Infrastructure	\$22,485.00	No
ML14072	City of Cathedral City	8/13/2014	1/12/2021		\$136,000.00	\$0.00	Medium & H.D. Vehicles, EV Charging, Bike	\$136,000.00	No
ML14093	County of Los Angeles Dept of Publi	8/14/2015	1/13/2019		\$150,000.00	\$0.00	San Gabriel BikeTrail Underpass Improvem	\$150,000.00	No
MS14001	Los Angeles County MTA	3/6/2015	4/30/2015		\$1,216,637.00	\$0.00	Clean Fuel Transit Service to Dodger Stadiu	\$1,216,637.00	No
MS14002	Orange County Transportation Autho	9/6/2013	4/30/2014		\$576,833.00	\$576,833.00	Clean Fuel Transit Service to Orange Count	\$0.00	No
MS14004	Orange County Transportation Autho	9/24/2013	4/30/2014		\$36,800.00	\$35,485.23	Implement Express Bus Service to Solar De	\$1,314.77	No
MS14005	Transit Systems Unlimited, Inc.	4/11/2014	2/28/2016		\$515,200.00	\$360,640.00	Provide Expanded Shuttle Service to Hollyw	\$154,560.00	No
MS14007	Orange County Transportation Autho	6/6/2014	4/30/2015		\$208,520.00	\$189,622.94	Implement Special Metrolink Service to Ang	\$18,897.06	No
MS14008	Orange County Transportation Autho	8/13/2014	5/31/2015		\$601,187.00	\$601,187.00	Implement Clean Fuel Bus Service to Orang	\$0.00	No
MS14039	Waste Management Collection and	7/10/2015	4/9/2016		\$75,000.00	\$0.00	Vehicle Maint. Fac. Modifications - Irvine	\$75,000.00	No
MS14040	Waste Management Collection and	7/10/2015	4/9/2016		\$75,000.00	\$0.00	Vehicle Maint. Fac. Modifications - Santa An	\$75,000.00	No

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
MS14042	Grand Central Recycling & Transfer	6/6/2014	9/5/2021		\$150,000.00	\$0.00	Expansion of Existing CNG Station	\$150,000.00	No
MS14045	TIMCO CNG Fund I, LLC	6/6/2014	12/5/2020		\$150,000.00	\$135,000.00	New Public-Access CNG Station in Inglewoo	\$15,000.00	No
MS14046	Ontario CNG Station Inc.	5/15/2014	5/14/2020	5/14/2021	\$150,000.00	\$0.00	Expansion of Existing CNG Infrastructure	\$150,000.00	No
MS14052	Arcadia Unified School District	6/13/2014	10/12/2020		\$78,000.00	\$78,000.00	Expansion of an Existing CNG Fueling Statio	\$0.00	No
MS14053	Upland Unified School District	1/9/2015	7/8/2021		\$175,000.00	\$0.00	Expansion of Existing CNG Infrastructure	\$175,000.00	No
MS14057	Los Angeles County MTA	11/7/2014	10/6/2019		\$1,250,000.00	\$0.00	Implement Various Signal Synchronization P	\$1,250,000.00	No
MS14058	Orange County Transportation Autho	11/7/2014	4/6/2016		\$1,250,000.00	\$0.00	Implement Various Signal Synchronization P	\$1,250,000.00	No
MS14059	Riverside County Transportation Co	9/5/2014	3/4/2018		\$939,625.00	\$0.00	Implement Various Signal Synchronization P	\$939,625.00	No
MS14072	San Bernardino Associated Govern	3/27/2015	3/26/2018		\$1,250,000.00	\$0.00	Implement Various Signal Synchronization P	\$1,250,000.00	No
MS14073	Anaheim Transportation Network	1/9/2015	4/30/2017		\$221,312.00	\$118,207.06	Anaheim Resort Circulator Service	\$103,104.94	No
MS14074	Midway City Sanitary District	1/9/2015	3/8/2021		\$250,000.00	\$0.00	Limited-Access CNG Station & Facility Modif	\$250,000.00	No
MS14076	Rialto Unified School District	6/17/2015	2/16/2022		\$225,000.00	\$0.00	New Public Access CNG Station	\$225,000.00	No
MS14077	County Sanitation Districts of L.A. C	3/6/2015	5/5/2021		\$175,000.00	\$0.00	New Limited Access CNG Station	\$175,000.00	No
MS14080	CR&R Incorporated	6/1/2015	8/31/2021		\$249,954.00	\$0.00	Expansion of Existing CNG Infrastructure/M	\$249,954.00	No
MS14081	CR&R Incorporated	6/1/2015	5/30/2021		\$175,000.00	\$0.00	Expansion of Existing CNG Infrastructure/M	\$175,000.00	No
MS14083	Hacienda La Puente Unified School	7/10/2015	3/9/2022		\$175,000.00	\$0.00	New Limited Access CNG Station	\$175,000.00	No
MS14084	US Air Conditioning Distributors	5/7/2015	9/6/2021		\$100,000.00	\$0.00	Expansion of Existing CNG Infrastructure	\$100,000.00	No
MS14088	Southern California Regional Rail Au	5/7/2015	9/30/2015		\$79,660.00	\$0.00	Special Metrolink Service to Autoclub Speed	\$79,660.00	No
MS14090	City of Monterey Park	5/7/2015	5/6/2021		\$225,000.00	\$0.00	Expansion of Existing CNG Infrastructure	\$225,000.00	No

**Total: 53**

**Pending Execution Contracts**

ML14013	City of Los Angeles, Bureau of Sanit				\$3,840,000.00	\$0.00	Purchase 128 H.D. Nat. Gas Vehicles	\$3,840,000.00	No
ML14022	County of Los Angeles Department o				\$300,000.00	\$0.00	Purchase 10 H.D. Nat. Gas Vehicles	\$300,000.00	No
ML14023	County of Los Angeles Department o				\$230,000.00	\$0.00	Maintenance Fac. Modifications-Westcheste	\$230,000.00	No
ML14024	County of Los Angeles Department o				\$230,000.00	\$0.00	Maintenance Fac. Modifications-Baldwin Par	\$230,000.00	No
ML14025	County of Los Angeles Dept of Publi				\$300,000.00	\$0.00	Construct New CNG Station in Malibu	\$300,000.00	No
ML14026	County of Los Angeles Dept of Publi				\$300,000.00	\$0.00	Construct New CNG Station in Castaic	\$300,000.00	No
ML14027	County of Los Angeles Dept of Publi				\$500,000.00	\$0.00	Construct New CNG Station in Downey	\$500,000.00	No
ML14060	County of Los Angeles Internal Servi				\$104,400.00	\$0.00	Electric Vehicle Charging Infrastructure	\$104,400.00	No
ML14061	City of La Habra				\$60,000.00	\$0.00	Purchase Two Heavy-Duty Nat. Gas Vehicle	\$60,000.00	No
ML14067	City of Duarte Transit				\$60,000.00	\$0.00	Purchase Two Heavy-Duty Nat. Gas Vehicle	\$60,000.00	No
ML14069	City of Beaumont				\$200,000.00	\$0.00	Construct New CNG Infrastructure	\$200,000.00	No
ML14070	City of Rancho Cucamonga				\$365,245.00	\$0.00	Bicycle Trail Improvements	\$365,245.00	No
MS14035	Penske Truck Leasing Co., L.P.				\$75,000.00	\$0.00	Vehicle Maint. Fac. Modifications - Sun Valle	\$75,000.00	No
MS14036	Penske Truck Leasing Co., L.P.				\$75,000.00	\$0.00	Vehicle Maint. Fac. Modifications - La Mirad	\$75,000.00	No
MS14037	Penske Truck Leasing Co., L.P.				\$75,000.00	\$0.00	Vehicle Maint. Fac. Modifications - Carson	\$75,000.00	No
MS14038	Penske Truck Leasing Co., L.P.				\$75,000.00	\$0.00	Vehicle Maint. Fac. Modifications - Fontana	\$75,000.00	No

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
MS14041	USA Waste of California, Inc.				\$175,000.00	\$0.00	Limited-Access CNG Station, Vehicle Maint.	\$175,000.00	No
MS14075	Fullerton Joint Union High School Di				\$300,000.00	\$0.00	Expansion of Existing CNG Infrastructure/M	\$300,000.00	No
MS14078	American Honda Motor Co., Inc.				\$150,000.00	\$0.00	New Public Access CNG Station	\$150,000.00	No
MS14079	Waste Resources, Inc.				\$100,000.00	\$0.00	New Limited Access CNG Station	\$100,000.00	No
MS14082	Grand Central Recycling & Transfer				\$150,000.00	\$0.00	Expansion of Existing CNG Infrastructure	\$150,000.00	No
MS14085	Prologis, L.P.				\$100,000.00	\$0.00	New Limited Access CNG Station	\$100,000.00	No
MS14086	San Gabriel Valley Towing I				\$150,000.00	\$0.00	New Public Access CNG Station	\$150,000.00	No
MS14087	Orange County Transportation Autho				\$239,645.00	\$0.00	Implement Special Metrolink Service to Ang	\$239,645.00	No
MS14091	Serv-Wel Disposal				\$100,000.00	\$0.00	New Limited-Access CNG Infrastructure	\$100,000.00	No
MS14092	West Covina Unified School District				\$124,000.00	\$0.00	Expansion of Existing CNG Infrastructure	\$124,000.00	No

**Total: 26**

#### Declined/Cancelled Contracts

ML14063	City of Hawthorne				\$32,000.00	\$0.00	Expansion of Existng CNG Infrastructure	\$32,000.00	No
MS14043	City of Anaheim				\$175,000.00	\$0.00	Expansion of Existing CNG Station	\$175,000.00	No

**Total: 2**

#### Closed Contracts

ML14010	City of Cathedral City	8/13/2014	10/12/2015		\$25,000.00	\$25,000.00	Street Sweeping Operations	\$0.00	Yes
ML14011	City of Palm Springs	6/13/2014	1/12/2016		\$79,000.00	\$78,627.00	Bicycle Racks, Bicycle Outreach & Educatio	\$373.00	Yes
ML14015	Coachella Valley Association of Gov	6/6/2014	9/5/2015		\$250,000.00	\$250,000.00	Street Sweeping Operations	\$0.00	Yes
ML14020	County of Los Angeles Dept of Publi	8/13/2014	1/12/2018		\$150,000.00	\$0.00	San Gabriel BikeTrail Underpass Improvem	\$150,000.00	No
ML14065	City of Orange	9/5/2014	8/4/2015		\$10,000.00	\$10,000.00	Electric Vehicle Charging Infrastructure	\$0.00	Yes
MS14003	Orange County Transportation Autho	8/1/2013	4/30/2014	10/30/2014	\$194,235.00	\$184,523.00	Implement Metrolink Service to Angel Stadiu	\$9,712.00	Yes
MS14009	A-Z Bus Sales, Inc.	1/17/2014	12/31/2014	3/31/2015	\$388,000.00	\$388,000.00	Alternative Fuel School Bus Incentive Progr	\$0.00	No
MS14047	Southern California Regional Rail Au	3/7/2014	9/30/2014		\$49,203.00	\$32,067.04	Special Metrolink Service to Autoclub Speed	\$17,135.96	Yes
MS14048	BusWest	3/14/2014	12/31/2014	5/31/2015	\$940,850.00	\$847,850.00	Alternative Fuel School Bus Incentive Progr	\$93,000.00	Yes

**Total: 9**

#### Open/Complete Contracts

MS14044	TIMCO CNG Fund I, LLC	5/2/2014	11/1/2020		\$150,000.00	\$150,000.00	New Public-Access CNG Station in Santa A	\$0.00	Yes
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**Total: 1**

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
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## ***FY 2014-2016 Contracts***

### ***Open Contracts***

MS14089	Top Shelf Consulting, LLC	2/5/2015	8/4/2016		\$200,000.00	\$120,034.00	Enhanced Fleet Modernization Program	\$79,966.00	No
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**Total: 1**

### ***Pending Execution Contracts***

MS16001	Los Angeles County MTA				\$1,350,000.00	\$0.00	Clean Fuel Transit Service to Dodger Stadium	\$1,350,000.00	No
MS16002	Orange County Transportation Authority				\$722,266.00	\$0.00	Clean Fuel Transit Service to Orange County	\$722,266.00	No
MS16003	Special Olympics World Games Los Angeles				\$380,536.00	\$0.00	Low-Emission Transportation Service for Special Olympics	\$380,536.00	No
MS16004	Mineral LLC				\$25,890.00	\$0.00	Design, Develop, Host and Maintain MSRC	\$25,890.00	No

**Total: 4**

 [Back to Agenda](#)

BOARD MEETING DATE: September 4, 2015

AGENDA NO. 35

REPORT: California Air Resources Board Monthly Meeting

SYNOPSIS: The California Air Resources Board met on July 23, 2015, in Sacramento. The following is a summary of this meeting.

RECOMMENDED ACTION:  
Receive and File.

Judith Mitchell, Member  
SCAQMD Governing Board

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The Air Resources Board's (ARB or Board) July meeting was held on July 23, 2015 in Sacramento at the California Environmental Protection Agency Headquarters Building. Key items presented are summarized below.

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#### Consent Items

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**1. Public Meeting to Consider Appointments of Two New Members to the Research Screening Committee.**

The Board appointed Dr. J.R. DeShazo from the University of California, Los Angeles, and Dr. Tim Wallington, from the Ford Motor Company, to the Research Screening Committee (RSC). The RSC advises the Board on valuable research projects.

**2. Public Meeting to Consider Research Proposals and Contract Augmentations.**

The Board approved ten research proposals and two contract augmentations developed in response to the Board-approved Fiscal Year 2015-2016 Annual Research Plan. The approved proposals include:

- 1) “Heavy-Duty On-Road Vehicle Inspection and Maintenance Program”,
- 2) “Designing Vehicle Retirement and Replacement Incentives for Low-Income Households”,
- 3) “Identifying, Evaluating and Selecting Indicators, Indices and Data for Future Monitoring System of the Implementation of Sustainable Communities Strategies”,
- 4) “Assessing the Travel Demand and Co-Benefit Impacts of Affordable TODs (Transit- oriented development)”,
- 5) “Zero-Carbon Buildings in California: A Feasibility Study”,
- 6) “Characterize Physical and Chemical Properties of Manure in California Dairy Systems to Improve Greenhouse Gas Emission Estimates”,
- 7) “Characterize California-specific Cattle Feed Rations and Improve Modeling of Enteric Fermentation for California's Greenhouse Gas Inventory”,
- 8) “Policy and Scenario Analysis for Managing and Mitigating California’s F-gas Emissions”,
- 9) “Improved Understanding of the Magnitude of Trans-Pacific Long Range Transported Ozone Aloft at California’s Coast”,
- 10) “LIDAR Profiling of Ozone in the San Joaquin Valley”,

The proposed contract augmentations include:

- 11) “Advanced Plug-In Electric Vehicle Travel and Charging Behavior”,
- 12) “Women’s Cardiovascular Risk from Particulate Matter Exposure”.

### **3. Public Meeting to Consider the Transportation Conformity Budgets for the San Joaquin Valley PM2.5 State Implementation Plan Supplement.**

The Board approved the additional transportation conformity budgets for the San Joaquin Valley PM2.5 SIP Plan Supplement. The transportation conformity budgets will be submitted to the United States Environmental Protection Agency as a revision to the California State Implementation Plan.

### **4. Public Meeting to Consider Submission of Waiver and Authorization Measures.**

The Board approved a list of applicable waiver and authorization measures for submission to the United States Environmental Protection Agency (U.S. EPA) for inclusion into the California State Implementation Plan (SIP). The submittal to U.S. EPA is required in response to a May 20, 2015 court ruling requiring California to

submit into the SIP all mobile source regulations seeking a waiver or authorization from U.S. EPA if California relies on these emission reductions to meet federal air quality standards.

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Discussion Items

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**1. Public Meeting to Select and Appoint a Vice Chair**

The Board approved the creation of a Vice Chair position to act in the absence of the Chair. The Board further appointed Board member Sandra Berg to the position of Vice Chair.

**2. Public Meeting to Consider the Greenhouse Gas Quantification Determination for the Kern Council of Governments' Regional Transportation Plan/Sustainable Communities Strategy**

The Board accepted the Kern Council of Governments (COG) determination that its 2014 Regional Transportation Plan/Sustainable Communities Strategy (SCS) will, if implemented, meet the region's per capita greenhouse gas emissions reduction targets. The SCS includes strategies to promote increased residential density, multi-family and mixed-use housing, and to better align transit-oriented development with residential areas and areas of employment. In addition the Board also asked staff to evaluate ways to streamline the ARB SCS review process and develop methods to track implementation of the SCSs.

**3. Public Meeting to Consider the Air Resources Board/California Air Pollution Control Officers Association Risk Management Guidance for Stationary Sources of Air Toxics**

The Board approved a joint guidance document developed by ARB staff and the California Air Pollution Control Officers Association on risk management policy. The purpose of the guidance is to assist local air districts in administering their air toxics programs, specifically the permitting program (e.g., new and modified sources) and the "Hot Spots" program (e.g., risk assessment, notification, risk reduction audits and plans). This guidance uses the Office of Environmental Health Hazard Assessment's updated risk assessment methodology designed to ensure infants and children are appropriately addressed in assessing risk. In keeping with the new guidance, ARB will assess existing ARB air toxics-related regulations and continue efforts to reduce emissions from mobile sources via the Sustainable Freight Strategy, the State Implementation Plan, and the Scoping Plan.

**4. Public Meeting to Update the Board on Proposed Federal Phase 2**



## **Greenhouse Gas Standards for Medium-and Heavy-Duty Engines and Vehicles**

The Board heard a presentation by ARB staff on a draft of the U.S. EPA and National Highway Traffic Safety Administration proposed Phase 2 Greenhouse Gas Emissions and Fuel Efficiency Standards (Standards) for Medium- and Heavy-Duty Engines and Vehicles. The joint proposed rule was published on July 13, 2015, and the Board received staff's initial assessment of the Standards and discussed the range of potential comments to U.S. EPA. In the presentation, staff highlighted the benefits the new Standards would bring to California for meeting air quality and GHG reduction targets and also the areas where the Standards can be improved, including better characterization of the important role of hybrids, battery electric and fuel cell vehicles, and other advanced technologies and the need for mitigation of higher PM2.5 emissions from increased APU reliance where these are not DPF equipped. The presentation also documented missed opportunities by not including a prominent and significant reference to new lower engine NOx emission standards that will be necessary for California to meet its clean air goals. Finally, the presentation discussed staff's preference for an alternative in the proposal that accelerates the full phase-in of the standard by 2024. ARB will testify at a U.S. EPA public hearing on August 18, 2015 in the Southern California and will submit formal written comments to U.S. EPA by September 17, 2015.

**SCAQMD Staff Comments/Testimony:** Mr. Henry Hogo commented that the SCAQMD staff agreed with CARB staff's initial assessment and that the EPA proposal should be strengthened. In addition, Mr. Hogo stressed the need to develop new engine exhaust emission standards for NOx. He indicated that U.S. EPA should begin the development of new NOx exhaust emission standards as early as possible in order for the South Coast Air Basin to attain air quality standards. Mr. Hogo indicated that the National Association of Clean Air Agencies (NACAA) will be providing comments on the need to develop lower NOx emission standards and that U.S. EPA should start rulemaking concurrently and independent of the Phase 2 greenhouse gas standards rulemaking. Mr. Hogo also commented on the need to identify funding for advanced technology vehicles, as commented by Dr. Barry R. Wallerstein at last month's CARB Board meeting.

### **Attachment**

CARB July 23, 2015 Meeting Agenda

**REVISED 7/21/15**

**PUBLIC MEETING AGENDA**

**July 23, 2015**

**[Webcast](#)**

**LOCATION:**

Air Resources Board  
Byron Sher Auditorium, Second Floor  
1001 I Street  
Sacramento, California 95814  
<http://www.calepa.ca.gov/EPAbldg/location.htm>

This facility is accessible by public transit. For transit information, call (916) 321-BUSS, website: <http://www.sacrt.com>  
(This facility is accessible to persons with disabilities.)

**TO SUBMIT WRITTEN COMMENTS ON AN AGENDA ITEM IN ADVANCE OF THE MEETING GO TO: <http://www.arb.ca.gov/lispub/comm/bclist.php>**

**Thursday  
July 23, 2015  
9:00 a.m.**

**CONSENT CALENDAR:**

The following items on the consent calendar will be presented to the Board immediately after the start of the public meeting, unless removed from the consent calendar either upon a Board member's request or if someone in the audience wishes to speak on it.

**Consent Item #**

**15-6-1: Public Meeting to Consider Appointments of Two New Members to the Research Screening Committee.**

*Staff will recommend the appointment of Dr. J.R. DeShazo from the University of California, Los Angeles, and Dr. Tim Wallington, from the Ford Motor Company, to the Research Screening Committee to fill the vacancies left by the resignations of Dr. Matt Kahn and Dr. Steve Japar. The Board's Research Screening Committee consists of scientists, engineers, and others who are knowledgeable, technically qualified, and experienced in air pollution research.*

[More Information](#)

**15-6-2: Public Meeting to Consider Research Proposals and Contract Augmentations**

*Staff will seek Board approval of ten research proposals and two contract augmentations that were developed in response to the Board-approved Fiscal Year 2015-2016 Annual Research Plan.*

- 1) "Advanced Plug-In Electric Vehicle Travel and Charging Behavior," University of California, Davis, Augmentation to Contract No. 12-319.

[More Information](#)

[Proposed Resolution](#)

- 2) "Heavy-Duty On-Road Vehicle Inspection and Maintenance Program," Foundation for California Community Colleges, Proposal No. 2789-283.

[More Information](#)

[Proposed Resolution](#)

- 3) *"Designing Vehicle Retirement and Replacement Incentives for Low-Income Households," University of California, Los Angeles, Proposal No. 2790-283.*  
[More Information](#) [Proposed Resolution](#)
- 4) *"Identifying, Evaluating and Selecting Indicators, Indices and Data for Future Monitoring System of the Implementation of Sustainable Communities Strategies," University of California, Los Angeles, Proposal No. 2791-283.*  
[More Information](#) [Proposed Resolution](#)
- 5) *"Assessing the Travel Demand and Co-Benefit Impacts of Affordable TODs," University of California, Berkeley, Proposal No. 2792-283.*  
[More Information](#) [Proposed Resolution](#)
- 6) *"Zero-Carbon Buildings in California: A Feasibility Study," University of California, Berkeley, Proposal No. 2793-283.*  
[More Information](#) [Proposed Resolution](#)
- 7) *"Characterize Physical and Chemical Properties of Manure in California Dairy Systems to Improve Greenhouse Gas Emission Estimates," University of California, Davis, Proposal No. 2794-283.*  
[More Information](#) [Proposed Resolution](#)
- 8) *"Characterize California-specific Cattle Feed Rations and Improve Modeling of Enteric Fermentation for California's Greenhouse Gas Inventory," University of California, Davis, Proposal No. 2795-283.*  
[More Information](#) [Proposed Resolution](#)
- 9) *"Policy and Scenario Analysis for Managing and Mitigating California's F-gas Emissions," University of California, Berkeley, Proposal No. 2796-283.*  
[More Information](#) [Proposed Resolution](#)
- 10) *"Improved Understanding of the Magnitude of Trans-Pacific Long Range Transported Ozone Aloft at California's Coast," San José State University, Proposal No. 2797-283.*  
**(The attached Proposed Resolution was revised 7/21/15)**  
[More Information](#) [Revised Proposed Resolution](#)
- 11) *"LIDAR Profiling of Ozone in the San Joaquin Valley," National Oceanic and Atmospheric Administration, Proposal No. 2798-283.*  
**(The attached Proposed Resolution was revised 7/21/15)**  
[More Information](#) [Revised Proposed Resolution](#)
- 12) *"Women's Cardiovascular Risk from Particulate Matter Exposure," University of California, Irvine, Augmentation to a pending contract.*  
[More Information](#) [Proposed Resolution](#)

**15-6-3: Public Meeting to Consider the Transportation Conformity Budgets for the San Joaquin Valley PM2.5 State Implementation Plan Supplement**

*The Board will consider approval of the Transportation Conformity Budgets for the San Joaquin Valley PM2.5 SIP Plan Supplement. If approved, the transportation conformity budgets will be submitted to the United States Environmental Protection Agency as a revision to the California State Implementation Plan.*

[More Information](#)

[Proposed Resolution](#)

**15-6-4: Public Meeting to Consider Submission of Waiver and Authorization Measures**

*The Board will consider approval of the Waiver/Authorization List of all applicable waiver and authorization measures for submission to the United States Environmental Protection Agency for inclusion into the California State Implementation Plan.*

[More Information](#)

[Proposed Resolution](#)

**DISCUSSION ITEMS:**

**Note:** The following agenda items may be heard in a different order at the Board meeting.

**Agenda Item #****15-6-10: Public Meeting to Select and Appoint a Vice-Chair**

*The Board will select and appoint a Vice-Chair to act in the absence of the Chairman.*

**15-6-5: Public Meeting to Consider the Greenhouse Gas Quantification Determination for the Kern Council of Governments' Regional Transportation Plan/Sustainable Communities Strategy**

*The Board will consider action to accept or reject the Kern Council of Governments' (KernCOG) determination that its 2014 Sustainable Communities Strategy, if implemented, would achieve the region's per capita greenhouse gas emissions reduction targets for 2020 and 2035. Staff will present its technical evaluation of the greenhouse gas determination for the 2014 Regional Transportation Plan/Sustainable Communities Strategy adopted by KernCOG on June 19, 2014.*

[More Information](#)

[Staff Presentation](#)

**15-6-8: Public Meeting to Consider the Air Resources Board/California Air Pollution Control Officers Association Risk Management Guidance for Stationary Sources of Air Toxics**

*The Board will consider approval of a joint guidance document developed by the Air Resources Board staff and the California Air Pollution Control Officers Association on risk management policy. The purpose of the guidance is to assist local air districts in administering their air toxics programs, specifically the permitting program (e.g., new and modified sources) and the Assembly Bill 2588 "Hot Spots" program (e.g., risk assessment, notification, risk reduction audits and plans). This guidance uses the Office of Environmental Health Hazard Assessment's updated risk assessment methodology designed to ensure infants and children are explicitly addressed in assessing risk.*

[More Information](#)

[Staff Presentation](#)

**15-6-6: Public Meeting to Update the Board on Proposed Federal Phase 2 Greenhouse Gas Standards for Medium- and Heavy-Duty Engines and Vehicles**

*Staff will update the Board on the United States Environmental Protection Agency and National Highway Traffic Safety Administration proposed Phase 2 Greenhouse Gas Standards for Medium- and Heavy-Duty Engines and Vehicles. Staff will present staff's initial assessment of the proposed standards, highlight areas where it could be strengthened, and provide a brief discussion on how the proposed standards support meeting the State's 2030 climate goals.*

[More Information](#)

[Staff Presentation](#)

**CLOSED SESSION**

*The Board will hold a closed session, as authorized by Government Code section 11126(e), to confer with, and receive advice from, its legal counsel regarding the following pending or potential litigation, and as authorized by Government Code section 11126(a):*

*American Fuels and Petrochemical Manufacturers, et al. v. Jane O'Keeffe, et al., U.S. District Court (D. Ore. Portland), Case No. 3:15-CV-00467.*

*CO-AL Transport v. CalEPA/ARB, U.S. Court of Appeals, Ninth Circuit, Case No. 15-70839.*

*Sarah Farley v. California Air Resources Board, Superior Court of California (Sacramento County), Case No. 34-2015-80002044.*

*POET, LLC, et al. v. Corey, et al., Superior Court of California (Fresno County), Case No. 09CECG04850; plaintiffs' appeal, California Court of Appeal, Fifth District, Case No. F064045; California Supreme Court, Case No. S213394. [remanded to trial court].*

*Rocky Mountain Farmers Union, et al. v. Corey, U.S. District Court (E.D. Cal. Fresno), Case No. 1:09-CV-02234-LJO-DLB; ARB interlocutory appeal, U.S. Court of Appeals, Ninth Circuit, Case No. 09-CV-02234 [remanded to trial court].*

*American Fuels and Petrochemical Manufacturers, et al. v. Corey, et al., U.S. District Court (E.D. Cal. Fresno), Case No. 1:10-CV-00163-AWI-GSA; ARB's interlocutory appeal, U.S. Court of Appeals, Ninth Circuit, Case No. 10-CV-00163 [remanded to trial court].*

*California Dump Truck Owners Association v. Nichols, U.S. District Court (E.D. Cal. Sacramento), Case No. 2:11-CV-00384-MCE-GGH; plaintiffs' appeal, U.S. Court of Appeals, Ninth Circuit, Case No. 13-15175.*

*Engine Manufacturers Association v. California Air Resources Board, Sacramento Superior Court, Case No. 34-2010-00082774; ARB's successful appeal, California Court of Appeal, Third District, Case No. C071891 [remanded to the trial court].*

*Truck and Engine Manufacturers Association v. California Air Resources Board, Sacramento Superior Court, Case No. 34-2013-00150733.*

*Alliance of Automobile Manufacturers v. California Air Resources Board; Sacramento Superior Court, Case No. 34-2013-00152974.*

*California Chamber of Commerce et al. v. California Air Resources Board, Sacramento Superior Court, Case No. 34-2012-80001313; plaintiffs' appeal, California Court of Appeal, Third District, Case No. C075930.*

*Morning Star Packing Company, et al. v. California Air Resources Board, et al.*, Sacramento Superior Court, Case No. 34-2013-800001464; plaintiffs' appeal, California Court of Appeal, Third District, Case No. C075954.

*Delta Construction Company, et al. v. United States Environmental Protection Agency*, U.S. Court of Appeals, District of Columbia Circuit, Case No. 11-1428.

*Alliance for California Business v. Nichols et al.*, Glenn County Superior Court, Case No. 13CV01232.

*Dalton Trucking, Inc. v. United States Environmental Protection Agency*, U.S. Court of Appeals, District of Columbia Circuit, Case No. 13-1283.

*Owner-Operator Independent Drivers Association Inc. et al. v. Richard W. Corey et al.*, U.S. District Court, (E.D. Cal. Fresno) Case No. 1:13-CV-01998-LJO-SAB (transferred by court to E.D.Cal. Sacramento, Case No. 2:14-CV-00186-MCE-AC).

*John R. Lawson Rock & Oil, Inc. et al. v. California Air Resources Board et al.*, Fresno County Superior Court, Case No. 14-CECG01494.

*Transportation Solutions Defense and Education Fund v. California Air Resources Board*, Fresno County Superior Court, Case No. 14CECG01788 (plaintiff's transfer to Sacramento Superior).

*California Nozzle Specialists, Inc. v. California Air Resources Board*, Los Angeles County Superior Court, Case No. BC564965.

*California Air Resources Board v. BP West Coast Products LLC*, Contra Costa County Superior Court, Case No. C12-00567.

#### **OPPORTUNITY FOR MEMBERS OF THE BOARD TO COMMENT ON MATTERS OF INTEREST**

*Board members may identify matters they would like to have noticed for consideration at future meetings and comment on topics of interest; no formal action on these topics will be taken without further notice.*

#### **OPEN SESSION TO PROVIDE AN OPPORTUNITY FOR MEMBERS OF THE PUBLIC TO ADDRESS THE BOARD ON SUBJECT MATTERS WITHIN THE JURISDICTION OF THE BOARD**

*Although no formal Board action may be taken, the Board is allowing an opportunity to interested members of the public to address the Board on items of interest that are within the Board's jurisdiction, but that do not specifically appear on the agenda. Each person will be allowed a maximum of three minutes to ensure that everyone has a chance to speak.*

#### **TO ELECTRONICALLY SUBMIT WRITTEN COMMENTS ON AN AGENDA ITEM IN ADVANCE OF THE MEETING GO TO:**

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(Note: not all agenda items are available for electronic submittals of written comments.)

#### **IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT THE CLERK OF THE BOARD:**

1001 I Street, 23<sup>rd</sup> Floor, Sacramento, California 95814

(916) 322-5594

ARB Homepage: [www.arb.ca.gov](http://www.arb.ca.gov)

**SPECIAL ACCOMMODATION REQUEST**

Consistent with California Government Code Section 7296.2, special accommodation or language needs may be provided for any of the following:

- An interpreter to be available at the hearing;
- Documents made available in an alternate format or another language;
- A disability-related reasonable accommodation.

To request these special accommodations or language needs, please contact the Clerk of the Board at (916) 322-5594 or by facsimile at (916) 322-3928 as soon as possible, but no later than 7 business days before the scheduled Board hearing. TTY/TDD/Speech to Speech users may dial 711 for the California Relay Service.

Consecuente con la sección 7296.2 del Código de Gobierno de California, una acomodación especial o necesidades lingüísticas pueden ser suministradas para cualquiera de los siguientes:

- Un intérprete que esté disponible en la audiencia
- Documentos disponibles en un formato alternativo u otro idioma
- Una acomodación razonable relacionados con una incapacidad

Para solicitar estas comodidades especiales o necesidades de otro idioma, por favor llame a la oficina del Consejo al (916) 322-5594 o envíe un fax a (916) 322-3928 lo más pronto posible, pero no menos de 7 días de trabajo antes del día programado para la audiencia del Consejo. TTY/TDD/Personas que necesiten este servicio pueden marcar el 711 para el Servicio de Retransmisión de Mensajes de California.

[↑ Back to Agenda](#)

BOARD MEETING DATE: September 4, 2015

AGENDA NO. 36

REPORT: Status Report on Regulation XIII – New Source Review

SYNOPSIS: This report presents the federal Final Determination of Equivalency for January 2013 through December 2013. As such, it provides information regarding the status of Regulation XIII – New Source Review in meeting federal NSR requirements and shows that SCAQMD’s NSR program is in final compliance with applicable federal requirements from January 2013 through December 2013.

COMMITTEE: Stationary Source, July 24, 2015, Reviewed

RECOMMENDED ACTION:  
Receive and file the attached report.

Barry R. Wallerstein, D.Env.  
Executive Officer

MN:WCT:DRH

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## SUMMARY

SCAQMD’s NSR Rules and Regulations are designed to comply with federal and state Clean Air Act requirements and to ensure that emission increases from new and modified sources do not interfere with efforts to attain and maintain the federal and state air quality standards, while economic growth in the South Coast region is not unnecessarily impeded. Regulation XIII - New Source Review regulates and accounts for all emission changes (both increases and decreases) from the permitting of new, modified, and relocated stationary sources within SCAQMD, excluding NO<sub>x</sub> and SO<sub>x</sub> sources that are subject to Regulation XX – Regional Clean Air Incentives Market (RECLAIM)<sup>1</sup>.

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<sup>1</sup> While the RECLAIM program is different than command and control rules for NO<sub>x</sub> and SO<sub>x</sub> and it provides greater regulatory flexibility to businesses, its NSR requirements, as specified in Rule 2005, are designed to comply with the governing principles of NSR contained in the federal Clean Air Act (CAA) and the California State Health and Safety Code.



Rule 1315 – Federal New Source Review Tracking System, was most recently adopted by the Board on February 4, 2011 to maintain SCAQMD’s ability to issue permits to major sources that require offsets, but obtain offset credits from the SCAQMD’s Priority Reserve under Rule 1309.1, and/or that are exempt from offsets under SCAQMD Rule 1304. In addition, Rule 1315 requires that, commencing with calendar year 2010, and for each calendar year thereafter, the Executive Officer prepare a Preliminary Determination of Equivalency (PDE) and Final Determination of Equivalency (FDE), which cover NSR activities for twelve-month periods. The calendar year 2013 FDE is required to be reported to the SCAQMD Board at the September 2015 Board meeting. In addition, Rule 1315 requires the Executive Officer to aggregate and track offsets debited from and deposited to SCAQMD’s offset accounts for specified periods between October 1, 1990 and December 31, 2005 and each calendar year from 2006 through 2030 for purpose of making periodic determinations of compliance. The last annual report submitted to the SCAQMD Board on February 6, 2015 presented the PDE for calendar year 2013 and demonstrated that SCAQMD’s NSR program continued to meet the federal offset requirements for calendar year 2013. Rule 1315 also requires that, commencing with calendar year 2011, and for each calendar year thereafter, the Executive Officer include in each FDE the cumulative net emission increase of each nonattainment air contaminant that occurred at major and minor facilities from February 4, 2011, the date of adoption of Rule 1315, through the end of the calendar year 2011 reporting period and through the end of each subsequent reporting period, and the projected cumulative net emission increases at the end of each of the two subsequent reporting periods, which for the calendar year 2013 FDE are calendar years 2014 and 2015.

This report, which presents the FDE covering the calendar year 2013 reporting period, and includes the net emission increase of each nonattainment air contaminant, demonstrates compliance with federal NSR requirements by establishing aggregate equivalence with federal offset requirements for sources that were not exempt from federal offset requirements, but were either exempt from offsets or obtained their offsets from SCAQMD pursuant to Regulation XIII.

The FDE for calendar year 2013 is summarized in Table 1. Additionally, the projections of SCAQMD’s federal offset account balances for January 2014 through December 2014 and January 2015 through December 2015, as specified and required pursuant to Rule 1315(e), are presented in Table 2. These results demonstrate that there were, and project that there will be, adequate offsets available to mitigate all applicable emission increases during these reporting periods. This report, therefore, demonstrates that, for calendar years 2013 through 2015, SCAQMD’s NSR program continues to meet and is projected to meet federal offset requirements and is equivalent to those

requirements on an aggregate basis<sup>2</sup>. Although the United States Environmental Protection Agency (U.S. EPA) designated the SCAQMD as attainment with the federal CO standard effective June 11, 2007, and the federal PM10 standard effective July 26, 2013, SCAQMD will continue to track and report CO and PM10 accumulated credits and account balances for informational purposes only.

**Table 1**  
**Federal Offset Accounts FDE for January 2013 through December 2013**

DESCRIPTION	VOC	NO <sub>x</sub>	SO <sub>x</sub>	CO	PM10
<b>2012 Actual Ending Balance<sup>a</sup> (ton/day)</b>	<b>88.82</b>	<b>26.60</b>	<b>3.22</b>	<b>18.90</b>	<b>13.59</b>
2013 Discount of Credits for Surplus Adjustment <sup>b</sup> (ton/day)	0.00	-1.25	0.00	0.00	0.00
2013 Actual Total Credits <sup>c</sup> (lb/day)	10,805	1,734	174	3,574	1,164
2013 Actual Total Debits <sup>c</sup> (lb/day)	-1,976	-14	0	-15,957	0
<b>Sum of Actual Credits/Debits<sup>c</sup> (lb/day)</b>	<b>8,829</b>	<b>1,720</b>	<b>174</b>	<b>-12,383</b>	<b>1,164</b>
<b>Sum of Actual Credits/Debits<sup>c</sup> (ton/day)</b>	<b>4.41</b>	<b>0.86</b>	<b>0.09</b>	<b>-6.19</b>	<b>0.58</b>
<b>2013 Ending Balance<sup>d</sup> (ton/day)</b>	<b>93.23</b>	<b>26.21</b>	<b>3.31</b>	<b>12.71</b>	<b>14.17</b>

<sup>a</sup> “2012 Actual Ending Balance” is from Table 1 of the 2012 PDE Report dated September 5, 2014.

<sup>b</sup> This adjustment is surplus at the time of use discount, which is also discussed in Rule 1315(c)(4).

<sup>c</sup> For an explanation of the sources of credits and debits please refer to page 9 of this report, as well as Rule 1315(c) and the February 4, 2011 Rule 1315 staff report. Credits are shown as positive and debits as negative, while sum of credits/debits are shown as positive or negative, as appropriate.

<sup>d</sup> “2013 Ending Balance” equals the “2012 Actual Ending Balance,” reduced by any surplus adjustments, and the sum of actual credits and actual debits.

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<sup>2</sup> SCAQMD’s NSR program is deemed to be equivalent to federal offset requirements. SCAQMD’s ending offset account balances remained positive, indicating there were adequate offsets during this reporting period.

**Table 2**  
**Projections of SCAQMD’s Federal Offset Account Balances for**  
**January 2014 through December 2014, and**  
**January 2015 through December 2015**

DESCRIPTION	VOC	NO <sub>x</sub>	SO <sub>x</sub>	CO	PM <sub>10</sub>
<b>2013 Ending Balance<sup>a</sup> (ton/day)</b>	<b>93.23</b>	<b>26.21</b>	<b>3.31</b>	<b>12.71</b>	<b>14.17</b>
2014 Projected Discount of Credits for Surplus Adjustment <sup>b</sup> (ton/day)	-0.47	-1.32	0.00	-0.11	-0.02
<b>2014 Projected Starting Balance (ton/day)</b>	<b>92.76</b>	<b>24.89</b>	<b>3.31</b>	<b>12.60</b>	<b>14.15</b>
2014 Total Projected Credits <sup>c</sup> (lb/day)	11,980	2,420	480	4,520	1,760
2014 Total Projected Debits <sup>c</sup> (lb/day)	-900	-640	0	-3,200	-180
<b>2014 Sum of Projected Credits/Debits<sup>c</sup> (lb/day)</b>	<b>11,080</b>	<b>1,780</b>	<b>480</b>	<b>1,320</b>	<b>1,580</b>
<b>2014 Sum of Projected Credits/Debits<sup>c</sup> (ton/day)</b>	<b>5.54</b>	<b>0.89</b>	<b>0.24</b>	<b>0.66</b>	<b>0.79</b>
<b>2014 Projected Ending Balance<sup>d</sup> (ton/day)</b>	<b>98.30</b>	<b>25.78</b>	<b>3.55</b>	<b>13.26</b>	<b>14.94</b>
2015 Projected Discount of Credits for Surplus Adjustment <sup>b</sup> (ton/day)	-0.50	-1.30	0	-0.11	-0.02
<b>2015 Projected Starting Balance (ton/day)</b>	<b>97.80</b>	<b>24.48</b>	<b>3.55</b>	<b>13.15</b>	<b>14.92</b>
2015 Total Projected Credits <sup>c</sup> (lb/day)	12,212	2,564	540	4,705	1,884
2015 Total Projected Debits <sup>c</sup> (lb/day)	-677	-764	-7	-640	-215
<b>2015 Sum of Projected Credits/Debits<sup>c</sup> (lb/day)</b>	<b>11,535</b>	<b>1,800</b>	<b>533</b>	<b>4,065</b>	<b>1,669</b>
<b>2015 Sum of Projected Credits/Debits<sup>c</sup> (ton/day)</b>	<b>5.77</b>	<b>0.90</b>	<b>0.27</b>	<b>2.03</b>	<b>0.83</b>
<b>2015 Projected Ending Balance<sup>e</sup> (ton/day)</b>	<b>103.57</b>	<b>25.38</b>	<b>3.82</b>	<b>15.18</b>	<b>15.75</b>

<sup>a</sup> “2013 Ending Balance” is as shown in Table 1.

<sup>b</sup> This adjustment is surplus at the time of use discount, which is also discussed in Rule 1315(c)(4).

<sup>c</sup> For an explanation of the sources of credits and debits please refer to page 9 of this report, as well as Rule 1315(c) and the Rule 1315 staff report. Credits are shown as positive and debits as negative, while sum of credits/debits are shown as positive or negative, as appropriate.

<sup>d</sup> “2014 Projected Ending Balance” equals the “2013 Ending Balance” plus any projected surplus adjustments and the sum of projected credits and projected debits.

<sup>e</sup> “2015 Projected Ending Balance” equals the “2014 Projected Ending Balance” plus any projected surplus adjustments and the sum of projected credits and projected debits.

**Table 3**  
**Cumulative Net Emission Increase**  
**(February 4, 2011 – December 31, 2013)**

DESCRIPTION	VOC	NO <sub>x</sub>	SO <sub>x</sub>	CO	PM <sub>10</sub>
<b>2012 Net Emission Increase<sup>a</sup> (ton/day)</b>	<b>-4.43</b>	<b>-0.15</b>	<b>-0.04</b>	<b>NA</b>	<b>0.18</b>
2013 Increases in Potential to Emit <sup>b</sup> (ton/day)	2.97	0.84	0.13	NA	0.32
2013 Decreases in Potential to Emit <sup>c</sup> (ton/day)	-6.75	-1.08	-0.11	NA	-0.73
<b>Cumulative Net Emission Increase<sup>d</sup> (ton/day)</b>	<b>-8.21</b>	<b>-0.39</b>	<b>-0.02</b>	<b>0.00</b>	<b>-0.23</b>
Rule 1315(g) Table B Threshold (through December of 2013 - ton/day)	3.91	0.35	0.09	NA	0.55

- <sup>a</sup> “2012 Net Emission Increase” is from Table 3 of the FDE report dated September 5, 2014.
- <sup>b</sup> Increases in potential to emit that occur at major and minor facilities pursuant to Rule 1304 or Rule 1309.1.
- <sup>c</sup> Decreases in potential to emit that occur at major and minor facilities pursuant to Rule 1304 or Rule 1309.1.
- <sup>d</sup> “Cumulative Net Emission Increase” is the sum of the increases and decreases in the potential to emit that occur at major and minor facilities pursuant to Rule 1304 or Rule 1309.1.

**Table 4**  
**Projections of Cumulative Net Emission Increase**  
**January 2014 through December 2014, and**  
**January 2015 through December 2015**

DESCRIPTION	VOC	NO <sub>x</sub>	SO <sub>x</sub>	CO	PM <sub>10</sub>
<b>2013 Net Emission Increase<sup>a</sup> (ton/day)</b>	<b>-3.79</b>	<b>-0.25</b>	<b>0.02</b>	<b>NA</b>	<b>-0.41</b>
2014 Projected Emission Increase <sup>b</sup> (ton/day)	3.26	1.02	0.22	NA	0.75
2014 Projected Emission Decrease <sup>b</sup> (ton/day)	-5.96	-1.02	-0.19	NA	-0.78
<b>2014 Projected Cumulative Net Emission Increase<sup>c</sup> (ton/day)</b>	-6.49	-0.25	0.05	NA	-0.43
Rule 1315(g) Table B 2014 Threshold (ton/day)	<b>3.91</b>	<b>0.35</b>	<b>0.09</b>	<b>NA</b>	<b>0.55</b>
2015 Projected Emission Increase <sup>d</sup> (ton/day)	3.26	1.02	0.22	NA	0.75
2015 Projected Emission Decrease <sup>d</sup> (ton/day)	-5.96	-1.02	-0.19	NA	-0.78
<b>2015 Projected Cumulative Net Emission Increase<sup>e</sup> (ton/day)</b>	-10.28	-0.50	0.07	NA	-0.84
Rule 1315(g) Table B 2015 Threshold (ton/day)	<b>6.30</b>	<b>0.53</b>	<b>0.14</b>	<b>NA</b>	<b>0.90</b>

<sup>a</sup> “2013 Net Emission Increase” is the sum of the 2013 increases and decreases in potential to emit shown in Table 3.

<sup>b</sup> “2014 Projected Emission Increase” and “2014 Projected Emission Decrease” are the averages of the 2011, 2012 and 2013 increases and decreases, respectively, in potential to emit.

<sup>c</sup> “2014 Projected Cumulative Net Emission Increase” is the sum of the 2014 projected emission increase and decrease added to the 2013 net emission increase.

<sup>d</sup> “2015 Projected Emission Increase” and “2015 Projected Emission Decrease” are the averages of the 2011, 2012 and 2013 increases and decreases, respectively, in potential to emit.

<sup>e</sup> “2015 Projected Cumulative Net Emission Increase” is the sum of the 2014 projected cumulative net emission increase and the 2013 net emission increase.

## **BACKGROUND**

SCAQMD originally adopted its New Source Review Rules and Regulations (NSR program) in 1976. U.S. EPA approved SCAQMD’s NSR program into California’s State Implementation Plan (SIP) initially on January 21, 1981 (46FR5965) and again on December 4, 1996 (61FR64291). U.S. EPA approved SCAQMD’s May 3, 2002 Rule 1309.1 amendments into the SIP on June 19, 2006. The original program has evolved into the current version of the Regulation XIII rules in response to federal and state legal requirements and the changing needs of the local environment and economy. Specific amendments to the NSR rules were adopted by SCAQMD’s Board on

December 6, 2002 to facilitate and provide additional options for credit generation and use. Rule 1315 was adopted and re-adopted on September 8, 2006 and August 3, 2007, respectively. Rule 1309.1 was amended and replaced on September 8, 2006 and August 3, 2007, respectively. On November 3, 2008, in response to a lawsuit filed by a group of environmental organizations, a California State Superior Court Judge in the County of Los Angeles invalidated the August 3, 2007 adopted Rule 1315 and amendments to Rule 1309.1, and prohibited SCAQMD from taking any action to implement Rule 1315 or the amendments to Rule 1309.1 until it had prepared a new environmental assessment under the California Environmental Quality Act (CEQA). On February 4, 2011 SCAQMD adopted a revised and enhanced version of Rule 1315, which included a new CEQA assessment. EPA approved Rule 1315 into the SIP, and this approval was upheld by the Ninth Circuit Court of Appeals in 2015.

One element of SCAQMD's NSR program design is to offset emission increases in a manner at least equivalent to federal and state statutory NSR requirements. To this end, SCAQMD's NSR program implements the federal and state statutory requirements for NSR and ensures that construction and operation of new, relocated, and modified stationary sources does not interfere with progress towards attainment of the National and State Ambient Air Quality Standards. SCAQMD's computerized emission tracking system is utilized to demonstrate equivalence with federal and state offset requirements on an aggregate basis. Specific NSR requirements of federal law are presented below.

### **Federal Law**

The NSR requirements of federal law vary with respect to the area's attainment status and classification. Based on their classification, the South Coast Air Basin (SoCAB) and Salton Sea Air Basin (SSAB) must comply with the requirements for extreme and severe non-attainment areas, respectively, for ozone precursors (*i.e.*, VOC and NO<sub>x</sub>). During the equivalency period, both the SoCAB and the SSAB complied with the requirements for serious non-attainment areas for PM<sub>10</sub> and its precursors (*i.e.*, VOC, NO<sub>x</sub>, and SO<sub>x</sub>)<sup>3</sup>. SSAB is considered attainment for CO. Although effective June 11, 2007, U.S. EPA designated the SoCAB as attainment with federal CO standards, SCAQMD will continue to track and report CO accumulated credits and account balances for informational purposes only. Both SoCAB and SSAB are considered attainment for SO<sub>2</sub> and NO<sub>2</sub>, however SO<sub>x</sub> and NO<sub>x</sub> are precursors to pollutants for which both SoCAB and SSAB are designated as non-attainment<sup>4</sup>. The Mojave Desert Air Basin (MDAB) is currently classified as moderate non-attainment for ozone precursors (*i.e.*, VOC and NO<sub>x</sub>) and as attainment for NO<sub>x</sub>, SO<sub>x</sub>, and CO. Federal law requires the use of LAER and offsets for emissions of nonattainment pollutants (or their precursors) for new, modified, and relocated stationary sources, when the source is

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<sup>3</sup> As of July 26, 2013, SoCAB was redesignated as attainment for the federal 24-hour PM<sub>10</sub> standard and U.S. EPA approved a PM<sub>10</sub> maintenance plan. Since this redesignation occurred partway through this reporting period, PM<sub>10</sub> was tracked and reported as required.

<sup>4</sup> SO<sub>x</sub> is a precursor to PM<sub>10</sub> and NO<sub>x</sub> is a precursor to both PM<sub>10</sub> and ozone.

considered a major stationary source<sup>5</sup> for the nonattainment pollutants (or their precursors). This report demonstrates compliance with the federal NSR offsets requirements.

**OVERVIEW OF ANALYSIS METHODOLOGY**

The two most important elements of federal non-attainment NSR requirements are LAER and emission offsetting for major sources. As set forth in SCAQMD’s *Best Available Control Technology (BACT) Guidelines*, SCAQMD’s BACT requirements are at least as stringent as federal LAER for major sources. Furthermore, the NSR emission offset requirements that SCAQMD implements through its permitting process ensure that sources provide emission reduction credits (ERCs) to offset their emission increases in compliance with federal requirements. As a result, these sources each comply with federal offset requirements by providing their own ERCs. However, certain sources are exempt from SCAQMD’s offset requirements pursuant to Rule 1304 or qualify for offsets from SCAQMD’s Community Bank (applications received between October 1, 1990 and February 1, 1996 only) or Priority Reserve, both pursuant to Rule 1309.1. SCAQMD has determined that providing offset exemptions and the Priority Reserve (as well as the previously-administered Community Bank) is important to the NSR program and the local economy while encouraging installation of BACT. Therefore, SCAQMD has assumed the responsibility of providing the necessary offsets for exempt sources, the Priority Reserve, and the Community Bank. This report examines deposits to and withdrawals from SCAQMD’s emission offset accounts during calendar year 2013 and demonstrates programmatic equivalence on an aggregate basis with federal emission offset requirements for the sources exempt from providing offsets and the sources that receive offsets from the Priority Reserve or the Community Bank.

**SCAQMD’s Offset Accounts**

For the purposes of this report, federal debit and credit accounting for SCAQMD’s offset accounts was conducted pursuant to the same procedures previously agreed to by U.S. EPA and as delineated in Rule 1315 and described in the staff report. Each of the pollutants subject to offset requirements has its own federal offset account. SCAQMD’s NSR program is considered to provide equivalent or greater offsets of emissions as required by federal requirements for each subject pollutant provided the

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<sup>5</sup> The major source thresholds for SoCAB, SSAB and MDAB, based on their attainment status during the calendar year 2007 through 2010 reporting periods are summarized below:

Pollutant	SOCAB	SSAB	MDAB
VOC	10 ton/year	25 ton/year	100 ton/year
NOx	10 ton/year	25 ton/year	100 ton/year
SOx	100 ton/year	100 ton/year	100 ton/year
PM10	70 ton/year	70 ton/year	100 ton/year
CO	50 ton/year	100 ton/year	100 ton/year

balance of offsets left in SCAQMD's federal offset account for each pollutant remains positive, indicating that there were adequate offsets available.

#### *Debit Accounting*

SCAQMD tracks all emission increases that are offset through the Priority Reserve or the Community Bank, as well as all increases that are exempt from offset requirements pursuant to Rule 1304 – Exemptions. These increases are all debited from SCAQMD's federal offset accounts when they occur at federal major sources. For federal equivalency demonstrations, SCAQMD uses an offset ratio of 1.2-to-1.0 for extreme non-attainment pollutants (ozone and ozone precursors, *i.e.*, VOC and NO<sub>x</sub>) and uses 1.0-to-1.0 for all other non-attainment pollutants (non-ozone precursors, *i.e.*, SO<sub>x</sub>, CO, and PM<sub>10</sub>) to offset any such increases. That is, 1.2 pounds are deducted from SCAQMD's offset accounts for each pound of maximum allowable permitted potential to emit VOC or NO<sub>x</sub> increase at a federal source and 1.0 pound is deducted for each pound of maximum allowable permitted potential to emit SO<sub>x</sub>, CO, or PM<sub>10</sub> at a federal source. A more detailed description of federal debit accounting is provided in the Rule 1315 staff report for February 4, 2011 and Rule 1315(c)(2).

#### *Credit Accounting*

When emissions from a permitted source are permanently reduced (*e.g.*, installation of control equipment, removal of the source) and the emission reduction is not required by rule or law and is not called for by an AQMP control measure that has been assigned a target implementation date<sup>6</sup>, the permit holder may apply for ERCs for the pollutants reduced. If the permit holder for the source generating the emission reduction had previously received offsets from SCAQMD or has a "positive NSR balance" (*i.e.*, pre-1990 net emission increase), the quantity of SCAQMD offsets used or the amount of the positive NSR balance is subtracted from the reduction and "paid back" to SCAQMD's accounts prior to issuance of an ERC pursuant to Rule 1306. In certain other cases, permit holders do not always submit applications to claim ERCs or do not qualify to obtain ERCs for their equipment shutdowns or other eligible emission reductions. These unclaimed reductions are referred to as "orphan shutdowns" and are deposited in SCAQMD's offset accounts. ERCs provided as offsets by major sources in excess of the applicable federally-required offset ratio and all ERCs provided as offsets by minor sources not subject to federal offset requirements are also deposited in SCAQMD's federal offset accounts. A more detailed description of federal credit accounting is provided in Rule 1315(c)(3)(A) and its staff report.

### **DETERMINATION OF EQUIVALENCY WITH FEDERAL OFFSET REQUIREMENTS**

The federal offset requirements FDE for calendar year 2013 and the projections for calendar years 2014 and 2015 are summarized in Tables 1 and 2, respectively. The

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<sup>6</sup> Refer to Rule 1309(b) for a complete explanation of eligibility requirements.



detailed listing of actual final withdrawals, deposits and sum of withdrawals and deposits are shown in Tables A and B of Attachment I to this letter.

These account balances, shown in Tables A and B reflect the tracking sequence described under Rule 1315(c)(5).

### **CALIFORNIA ENVIRONMENTAL QUALITY ACT NET EMISSION INCREASES**

Pursuant to Rule 1315(g)(1), net emission increases of nonattainment air contaminants at major and minor facilities are based on the sum of increases and decreases in potential to emit at major and minor facilities pursuant to Rule 1304 – Exemptions or Rule 1309.1 – Priority Reserve.

Increases in potential to emit for major and minor sources include potential to emit increases from the Priority Reserve or Community Bank pursuant to Rule 1309.1 and exemptions from the offset requirements of Rule 1303 – Requirements pursuant to Rule 1304 – Exemptions.

Decreases to potential to emit for major and minor sources include, but are not limited to, potential to emit reductions as a result of orphan shutdowns and/or orphan reductions.

In addition, pursuant to Rule 1315(g)(2), projections of cumulative net emission increases at the end of the two subsequent reporting periods are based upon the average of the aggregate increase in potential to emit of each nonattainment air contaminant and the average of the aggregate emissions reductions of the same nonattainment air contaminant for the five reporting periods most recently included in a PDE or an FDE or each of the reporting periods commencing with the 2011 reporting period, whichever is fewer reporting periods. This calendar year 2013 FDE includes the third report of projections of cumulative net emission increases, and therefore the averages are based on the 2011, 2012, and 2013 increases in potential to emit and emissions reductions. The purpose of Rule 1315(g) is to ensure that implementation of Rule 1315 does not cause emission increases beyond those analyzed in the CEQA document for Rule 1315.

Cumulative net emission increases and projected cumulative net emission increase must remain below the thresholds shown in Table B of Rule 1315 in order for the Executive Officer to be able to continue to issue permits to exempt sources pursuant to Rule 1304 or subject to Rule 1309.1 Priority Reserve.

## **CONCLUSIONS**

The analysis presented in this report demonstrates the following:

- For calendar year 2013, SCAQMD's NSR program provides equivalent offsets to those required by federal NSR requirements and is equivalent to the federal requirements on an aggregate basis. This conclusion is based on the fact that the final ending offset account balances for this calendar year reporting period, as shown in Table 1, remained positive for all pollutants.
- SCAQMD's projected offset account balances for 2014 and 2015 are projected to remain positive. This means that the sum of the estimated deposits to and withdrawals from SCAQMD's offset accounts during 2014 and 2015 are projected to remain positive and, therefore, it demonstrates that SCAQMD's NSR program is equivalent to federal NSR requirements.
- From the date of adoption of Rule 1315 (February 4, 2011) to the end of calendar year 2012, both the cumulative net emission increase of each nonattainment air contaminant at major and minor facilities and the projected cumulative net emission increase for 2014 and 2015 remained below the thresholds identified in Table B of Rule 1315, and therefore the Executive Officer can continue to issue permits to construct and permits to operate that rely on further use of Rule 1304 exemptions or Rule 1309.1 Priority Reserve offsets to major and minor sources.

## **ATTACHMENT**

Attachment I – Detailed listing of actual debits, preliminary credits and sum of debits and credits

## ATTACHMENT I

Detailed listing of actual debits, preliminary credits and sum of debits and credits

**Table A**  
**Total Actual Debits from SCAQMD's Federal Offset Accounts**  
**(January 2013 through December 2013)**

<b>SCAQMD OFFSETS USED</b>	<b>VOC</b>	<b>NO<sub>x</sub></b>	<b>SO<sub>x</sub></b>	<b>CO</b>	<b>PM10</b>
Priority Reserve (lb/day)	-18	-10	0	0	0
Community Bank (lb/day)	0	0	0	0	0
Rule 1304 Exemptions (lb/day)	-1629	-2	0	-15,957	0
Sum Total of SCAQMD Offsets (lb/day)	-1647	-12	0	-15,957	0
1.2-to-1.0 Offset Ratio (lb/day)	-329	-2	N/A	N/A	N/A
<b>Total Actual Debits to SCAQMD Account (lb/day)</b>	<b>-1976</b>	<b>-14</b>	<b>0</b>	<b>-15,957</b>	<b>0</b>
<b>Total Actual Debits to SCAQMD Account (ton/day)</b>	<b>-0.99</b>	<b>-0.01</b>	<b>0</b>	<b>-7.98</b>	<b>0</b>

**Table B**  
**Total Actual Credits to SCAQMD's Federal Offset Accounts**  
**(January 2013 through December 2013)**

<b>CREDITS RECEIVED</b>	<b>VOC</b>	<b>NO<sub>x</sub></b>	<b>SO<sub>x</sub></b>	<b>CO</b>	<b>PM10</b>
Major Source Orphan Credits (lb/day)	1,702	114	0	591	0
Minor Source Orphan Credits (lb/day)	11,804	2,053	218	3,877	1,455
Total Orphan Credits (lb/day)	13,506	2,167	218	4,468	1,455
Adjustment to Actual Emissions* (lb/day)	-2,701	-433	-44	-894	-291
Discount of ERCs** (lb/day)	0	0	0	0	0
Creditable Minor Source ERC Use (lb/day)	0	0	0	0	0
Creditable Major Source ERC Use (lb/day)	0	0	0	0	0
<b>Total Actual Credits to SCAQMD Account (lb/day)</b>	10,805	1,734	174	3,574	1,164
<b>Total Actual Credits to SCAQMD Account (ton/day)</b>	<b>5.40</b>	<b>0.87</b>	<b>0.09</b>	<b>1.79</b>	<b>0.58</b>

\* Adjustment of orphan shutdown and orphan reduction offset credits deposited in SCAQMD offset accounts to correct from potential emissions to actual emissions as discussed in Rule 1315(c)(3)(B)(i).

\*\* Prior to issuance of ERCs, they are discounted for NSR "Payback," which includes payback of NSR balance, Community Bank and Priority Reserve allocations, and offset exemptions, as discussed in Rule 1315(c)(3)(A)(v) and Rule 1306(c).

**Table C**  
**Sum of Final Credits/Debits Activities in SCAQMD's Federal Offset Accounts**  
**(January 2013 through December 2013)**

<b>Description</b>	<b>VOC</b>	<b>NO<sub>x</sub></b>	<b>SO<sub>x</sub></b>	<b>CO</b>	<b>PM10</b>
Total Actual Debits* (lb/day)	-1,976	-14	0	-15,957	0
Total Actual Credits* (lb/day)	10,805	1,734	174	3,574	1,164
<b>Sum of Actual Debits(-)/Credits(+)* (lb/day)</b>	<b>8,829</b>	<b>1,720</b>	<b>174</b>	<b>-12,383</b>	<b>1,164</b>
<b>Sum of Actual Debits(-)/Credits(+)* (ton/day)</b>	<b>4.41</b>	<b>0.86</b>	<b>0.09</b>	<b>-6.19</b>	<b>0.58</b>

\* Debits are shown as negative and Credits as positive, while their sum is shown as negative or positive, as appropriate.

[↑ Back to Agenda](#)

BOARD MEETING DATE: September 4, 2015

AGENDA NO. 37

*(Continued from July 10, 2015 Board Meeting)*

PROPOSAL: Amend Rule 1148.1 – Oil and Gas Production Wells

SYNOPSIS: The proposed amendment seeks to provide enforceable mechanisms to reduce odor nuisance potential from emissions associated with oil and gas production facility operations and also updates rule language to promote clarity, consistency and enforceability. The proposed amendment: requires use of odor mitigation best practices; requires facilities located within 1,500 feet of a sensitive receptor to conduct and submit a specific cause analysis for any confirmed odor event; and requires facilities with continuing odor issues to develop and implement an approved Odor Mitigation Plan.

COMMITTEE: Stationary Source, February 20, and April 17, 2015, Reviewed

**RECOMMENDED ACTIONS:**

Adopt the attached resolution:

1. Certifying the Final Environmental Assessment for Proposed Amended Rule 1148.1 - Oil and Gas Production Wells; and
2. Amending Rule 1148.1 – Oil and Gas Production Wells.

Barry R. Wallerstein, D.Env.  
Executive Officer

PF:JW:NB:DO:DM

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**Background**

Rule 1148.1 – Oil and Gas Production Wells was adopted on March 5, 2004 to reduce volatile organic compound (VOC) emissions from well cellars as well as from sources of untreated process gas located at oil and gas production facilities. The rule included requirements for a visual inspection and maintenance program and for controlling untreated produced gas and to prevent venting to atmosphere. An increased awareness

of oil and gas production wells due to community concerns over potential environmental impacts from well stimulation techniques such as hydraulic fracturing and acidizing has resulted in a goal to minimize impacts to nearby residents and sensitive receptors from ongoing operations. In addition, between the years 2010 and 2014, operations at Allenco Energy Inc., an oil and gas production facility located adjacent to several sensitive receptors, had become the subject of close to 300 complaints, over 150 inspections and eighteen Notices of Violation (NOV), including six NOVs for Rule 402 – Nuisance due to odors. This further heightened awareness from the local community and other interested stakeholders, raising interest in pursuing environmental justice measures to both more rapidly respond to and prevent future situations from evolving at similarly located operations.

Proposed amendments to Rule 1148.1 address the operation and maintenance aspects of an oil and gas production facility, rather than the pre-production or stimulation aspects covered under the requirements of Rule 1148.2 - Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers. Currently production wells, primarily due to low emission potential, are registered under Rule 222 - Filing Requirements For Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II and do not require full permits. However, if these same wells have associated equipment (i.e. separation tanks, wastewater separators), the facility requires a comprehensive analysis under Rule 203 - Permit to Operate, and is subject to Regulation XIII requirements, as applicable.

### **Proposal**

The proposed amendment seeks to provide enforceable mechanisms to reduce odor nuisance potential from emissions associated with oil and gas production facility operations and also updates rule language to promote clarity, consistency and enforceability. The following summarizes key requirements of the proposed amendment:

- Update definition of a Sensitive Receptor for consistency with Rule 1148.2 - Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers and other SCAQMD rules, and include cross-references to other SCAQMD rules and definitions applicable to oil and gas production facilities to provide additional clarity.
- Require facilities to implement the following best odor mitigation practices: post instructions, in English and Spanish, for reporting odor complaints, including the name and contact number for the facility as well as the SCAQMD 1-800-CUT-SMOG complaint hotline number; utilize a rubber grommet designed for drill piping, production tubing or sucker rods to remove excess or free flowing fluid from piping, tubing or rods that are removed during maintenance or replacement activity; and remove accumulated organic liquid from a well cellar as soon as



possible but no later than by the end of the day following receipt of three or more complaints verified by SCAQMD personnel within the same day.

- Require facilities with central processing areas that are located within 1,500 feet of a sensitive receptor to operate and maintain a monitoring system that will alarm or notify operators at a central location and to conduct a Specific Cause Analysis and submit a report within 30 days following receipt of written notification of a Confirmed Odor Event or a Confirmed Oil Deposition Event. The required Specific Cause Analysis report includes identification of the equipment or activity associated with the confirmed event and mitigation and corrective actions, including a requirement to conduct additional monthly leak inspections when the specific cause is identified as a leak.
- Require any facility that has received notification of three (3) or more confirmed odor events within a six month period or that has received a notice of violation for Rule 402 – Nuisance for odors must prepare and submit for approval an Odor Mitigation Plan that identifies all potential sources of odor and incorporates additional odor mitigation best practices, including corrective actions identified in any previously submitted Specific Cause Analysis report. Additional best practice considerations include, but are not limited to: continual odor surveillance during rework, repair or maintenance activities, use of enclosures or equivalent while storing any removed drill piping, production tubing, or sucker rods; and shorter repair times following detection of any component leaks.

Lastly, staff has committed to evaluating the use of the SCAQMD web page and other communication mechanisms, including integrated use of Geographic Information Systems, to post and disseminate information to the public related to complaints and related activities at oil and gas production facilities. Staff will also continue to evaluate additional emerging control and monitoring technologies applicable to the industry.

### **Key Issues**

Staff has received perspectives from both the regulated industry and the affected communities associated with odor nuisance potential from the operation and maintenance of oil and gas production facilities. While the regulated industry maintains that these facilities have historically represented low emissions and associated odor nuisance potential – at least no more than other regulated entities, the affected communities, especially those located in close proximity, have voiced concerns over not only the odor-related events that have occurred and their associated health impacts, but also the observed level of response and degree of preventative action taken by both the facilities and the SCAQMD in response to complaints. The proposed amendment is meant to create additional enforcement mechanisms, short of a notice of violation, to provide facilities the opportunity to formally investigate and correct odor and related events before they become public nuisances. In addition, the proposed amendment

provides additional communication opportunities to provide assurance to the affected community that preventative and corrective measures are in place.

### **Public Process**

Over the past seven months, staff has worked with several community interest groups as well as the California Independent Petroleum Association through a series of three working group meetings held in separate locations within the communities of Los Angeles and Montebello and in close proximity to the urban-based oil and gas production facilities in the areas. Additional independent discussions were conducted with interested stakeholders. A public workshop was held on April 16, 2015 and a public consultation meeting was conducted on May 28, 2015. Staff has incorporated overall feedback into the proposed amendment.

### **California Environmental Quality Act (CEQA)**

Pursuant to California Environmental Quality Act Guidelines §15252 and §15162 and SCAQMD Rule 110, the SCAQMD has prepared an Environmental Assessment (EA) for Proposed Amended Rule 1148.1. The environmental analysis in the Draft EA concluded that Proposed Amended Rule 1148.1 would not generate any significant adverse environmental impacts. The Draft EA was released for a 30-day public review and comment period from April 29, 2015 to May 28, 2015. Subsequent to release of the Draft EA, modifications were made to the proposed project and some of the revisions were made in response to verbal and written comments on the project's effects. SCAQMD staff has reviewed the modifications to the proposed project and concluded that none of the modifications constitute significant new information or a substantial increase in the severity of an environmental impact, nor provide new information of substantial importance relative to the draft document. In addition, revisions to the proposed project in response to verbal or written comments would not create new, avoidable significant effects. As a result, these revisions do not require recirculation of the document pursuant to CEQA Guidelines §15073.5 and §15088.5. Therefore, the Draft EA is now a Final EA and is included as an attachment to this Board package. Prior to making a decision on the proposed amendments to Rule 1148.1, the SCAQMD Board must review and certify the Final EA as providing adequate information on the potential adverse environmental impacts of the proposed project.

### **Socioeconomic Analysis**

The proposed amendment reflects best practices that have been widely implemented in the industry. Any additional measure would only be triggered for those facilities that are either not adhering to the industry standards or have historically demonstrated limited operational or management oversight. After considering the individual cost of each Odor Mitigation Plan improvement for potentially affected facilities, the annual cost fell within the range of \$113,238 to \$121,494. This estimate assumes 24 facilities may need to install monitoring systems and 3 facilities will likely need to adopt Odor

Mitigation Plans. It has been a standard SCAQMD socioeconomic analysis practice that, when the annual compliance cost is less than one million current U.S. dollars, the Regional Economic Impact Model (REMI) is not used to simulate jobs and macroeconomic impacts. This is because the impact would most likely be very small and would fall within the noise of the model. REMI results constitute a major component of the SCAQMD's socioeconomic analysis. Therefore, when annual compliance cost is less than one million dollars and REMI is not used, the socioeconomic report can be brief and included in the staff report, unless otherwise determined on a case-by-case basis.

### **Implementation and Resource Impact**

Existing SCAQMD resources will be sufficient to implement the proposed amendments with minimal impact on the budget.

### **Attachments**

- A. Summary of Proposed Amendments
- B. Rule Development Process
- C. Key Contacts
- D. Resolution
- E. Rule Language
- F. Staff Report
- G. Final Environmental Assessment

**ATTACHMENT A**  
**SUMMARY OF PROPOSED AMENDMENTS**  
**Proposed Amended Rule 1148.1 – Oil and Gas Production Wells**

- ***Require Use of Odor Mitigation Best Practices***

Require facilities to implement the following best practices: post instructions, in English and Spanish, for reporting odor complaints, including the name and contact number for the facility as well as the SCAQMD 1-800-CUT-SMOG complaint hotline number; utilize a rubber grommet designed for drill piping, production tubing, or sucker rods to remove excess or free flowing fluid from piping, tubing or rods that are removed during maintenance or replacement activity; remove accumulated organic liquid from a well cellar as soon as possible but no later than by the end of the day following receipt of three or more complaints verified by SCAQMD personnel within the same day. Require facilities with central processing areas located within 1,500 feet of a sensitive receptor to operate and maintain a monitoring system that will alarm or notify operators at a central location.

- ***Require Facilities Located within 1,500 Feet of a Sensitive Receptor to Conduct and Submit a Specific Cause Analysis for Any Confirmed Odor or Oil Deposition Event***

Require facilities located within 1,500 feet of a sensitive receptor to conduct a Specific Cause Analysis and submit a report within 30 days following receipt of written notification of a Confirmed Odor Event or Confirmed Oil Deposition Event. The required Specific Cause Analysis report includes identification of the equipment or activity associated with the confirmed event and mitigation and corrective actions, including a requirement to conduct monthly leak inspections when the specific cause is identified as a leak.

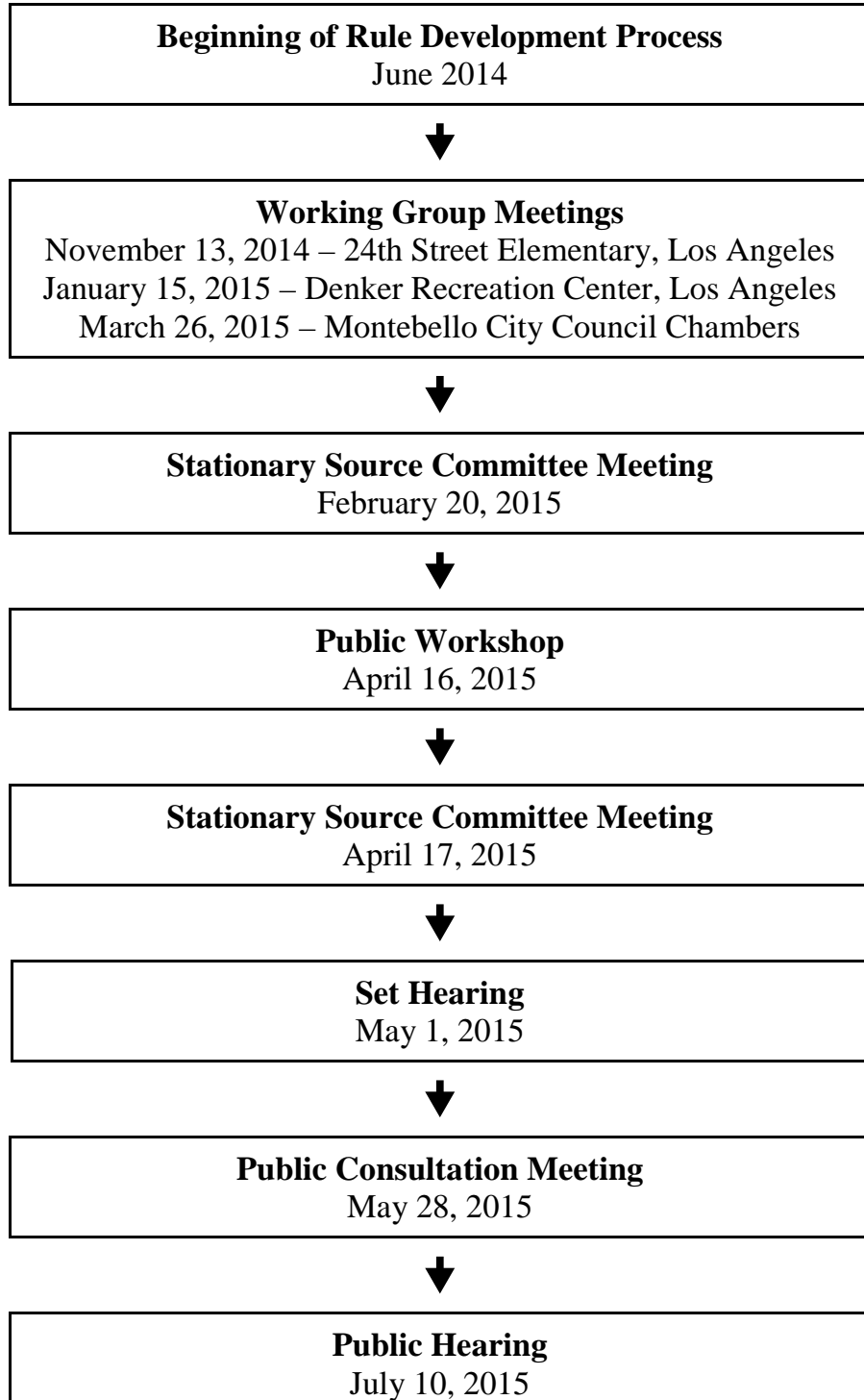
- ***Require Facilities with Continuing Odor Issues to Develop and Implement an Approved Odor Mitigation Plan***

Require any facility that has received notification of three (3) or more confirmed odor events within a six month period or that has received a notice of violation for Rule 402 – Nuisance for odors to prepare and submit for approval an Odor Mitigation Plan (OMP) that identifies all potential sources of odor and incorporates additional odor mitigation best practices, including corrective actions identified in any previously submitted specific cause analysis report. Additional best practice considerations include, but are not limited to: continual odor surveillance during rework, repair or maintenance activities, use of enclosures or equivalent while storing removed drill piping, production tubing or sucker rods; and shorter repair times following detection of any component leaks.

- ***Update Rule Language to Promote Clarity, Consistency and Enforceability***

Update definition of a Sensitive Receptor for consistency with Rule 1148.2 - Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers and other SCAQMD rules, and make clarifications and editorial corrections to Rule 1148.1 to enhance clarity and enforceability of the rule.

**ATTACHMENT B**  
**RULE DEVELOPMENT PROCESS**  
**Proposed Amended Rule 1148.1 – Oil and Gas Production Wells**



13 months spent in rule development

**ATTACHMENT C**  
**KEY CONTACTS**  
**Proposed Amended Rule 1148.1 - Oil and Gas Production Wells**

**Affected Facilities**

- Allenco Energy
- Amtek Oil
- Angus Petroleum
- Breitburn Operating LP
- E&B Natural Resources
- Freeport - McMoran
- Hillcrest Beverly Oil
- Holly Lane Oil
- Linn Energy
- Oxy Oil Long Beach
- Pacific Coast Energy Co.
- Signal Hill Petroleum
- Termo Oil and Energy
- Warren E&P

**Other Affected Associations or Entities**

- California Independent Petroleum Association
- Tether Law
- Western States Petroleum Association

**Other Interested Parties**

- Citizens Coalition for a Safe Community
- Communities for a Better Environment (CBE)
- Community Health Council
- Esperanza Housing Development
- Natural Resources Defense Council
- Redeemer Community Partnership
- Sierra Club
- Stand Together Against Neighborhood Drilling, Los Angeles (STAND, L.A.)

**ATTACHMENT D**  
**RESOLUTION NO. 15-\_\_\_\_\_**  
**Proposed Amended Rule 1148.1 - Oil and Gas Production Wells**

**A Resolution of the South Coast Air Quality Management District (SCAQMD) Governing Board certifying the Final Environmental Assessment for Proposed Amended Rule 1148.1 - Oil and Gas Production Wells.**

**A Resolution of the SCAQMD Governing Board amending Rule 1148.1 - Oil and Gas Production Wells.**

**WHEREAS**, the SCAQMD Governing Board finds and determines that the proposed amendments to Rule 1148.1 - Oil and Gas Production Wells are considered a "project" pursuant to the California Environmental Quality Act (CEQA); and

**WHEREAS**, the SCAQMD has had its regulatory program certified pursuant to Public Resources Code §21080.5 and has conducted a CEQA review pursuant to such program (SCAQMD Rule 110); and

**WHEREAS**, SCAQMD staff has prepared a Draft Environmental Assessment (EA) pursuant to its certified regulatory program and CEQA Guidelines §15252, setting forth the potential environmental consequences of Proposed Amended Rule 1148.1; and

**WHEREAS**, the Draft EA was circulated for a 30-day public review from April 29, 2015 to May 28, 2015; and

**WHEREAS**, subsequent to release of the Draft EA, modifications were made to the proposed project in response to verbal and written comments received relative to the project's effects. None of the individual comments identified any potentially significant adverse impacts from the proposed project. Further, none of the modifications constitute significant new information or a substantial increase in the severity of an environmental impact, nor provide new information of substantial importance relative to the draft document. In addition, revisions to the proposed project in response to comments would not create new, avoidable significant effects. The Draft EA has been revised such that it is now a Final EA; and

**WHEREAS**, Findings pursuant to Public Resources Code §21081.6 and CEQA Guidelines §15091 and a Statement of Overriding Considerations pursuant to CEQA Guidelines §15093 were not prepared because the analysis of the proposed project shows that Proposed Amended Rule 1148.1 would not have a significant adverse effect on the environment, and thus, are not required; and

**WHEREAS**, it is necessary that the adequacy of the Final EA be determined by the SCAQMD Governing Board prior to its certification; and

**WHEREAS**, pursuant to CEQA Guidelines §15252 (a)(2)(B), since no significant adverse impacts were identified, no alternatives or mitigation measures are required and thus, a Mitigation Monitoring Plan pursuant to Public Resources Code §21081.6 and CEQA Guidelines §15097, has not been prepared; and

**WHEREAS**, the SCAQMD Governing Board voting on Proposed Amended Rule 1148.1, has reviewed and considered the Final EA prior to its certification; and

**WHEREAS**, the SCAQMD Governing Board finds and determines, taking into consideration the factors in Section (d)(4)(D) of the Governing Board Procedures, that the modifications which have been made to Proposed Amended Rule 1148.1 since notice of public hearing was published do not significantly change the meaning of the proposed amended rule within the meaning of the Health and Safety Code §40726 and would not constitute significant new information requiring recirculation of the Draft EA pursuant to CEQA Guidelines §15073.5 and §15088.5; and

**WHEREAS**, the SCAQMD Governing Board has determined that a need exists to amend Rule 1148.1 - Oil and Gas Production Wells, to clarify requirements and provide additional enforceable mechanisms to prevent public nuisance from emissions of volatile organic compounds, toxic air contaminants and total organic compounds; and

**WHEREAS**, the SCAQMD Governing Board obtains its authority to adopt, amend or repeal rules and regulations from California Health and Safety Code §§ 39002, 40000, 40001, 40702, 40725 through 40728, 41508, and 41700; and

**WHEREAS**, the SCAQMD Governing Board has determined that Rule 1148.1 - Oil and Gas Production Wells, as proposed to be amended, is written or displayed so that its meaning can be easily understood by the persons directly affected by it; and



**WHEREAS**, the SCAQMD Governing Board has determined that Proposed Amended Rule 1148.1 - Oil and Gas Production Wells, as proposed to be amended, is in harmony with, and not in conflict with or contradictory to, existing federal or state statutes, court decisions, or state or federal regulations; and

**WHEREAS**, the SCAQMD Governing Board has determined that Proposed Amended Rule 1148.1 - Oil and Gas Production Wells, as proposed to be amended, does not impose the same requirements as any existing state or federal regulations and the proposed amendments are necessary and proper to execute the powers and duties granted to, and imposed upon, the SCAQMD; and

**WHEREAS**, the SCAQMD Governing Board has determined that Proposed Amended Rule 1148.1 - Oil and Gas Production Wells references the following statutes which the SCAQMD hereby implements, interprets or makes specific: Health and Safety Code §§ 40001 (rules to achieve ambient air quality standards), 40440 (b) (Best Available Retrofit Control Technology), and (c) (rules which are also cost-effective and efficient), 40702 (rules to execute duties required by law) and 41700 (public nuisance); and

**WHEREAS**, the SCAQMD Governing Board has determined that a Socioeconomic Impact Assessment is not required, pursuant to Health and Safety Code § 40440.8 or § 40728.5, because the Proposed Amended Rule 1148.1 - Oil and Gas Production Wells will not have a significant impact on air quality or emissions limitations; and

**WHEREAS**, a public hearing has been properly noticed in accordance with the provisions of Health and Safety Code §section 40725; and

**WHEREAS**, the SCAQMD Governing Board has held a public hearing in accordance with all provisions of law; and

**WHEREAS**, the SCAQMD Governing Board specifies the manager of Proposed Amended Rule 1148.1 - Oil and Gas Production Wells as the custodian of the documents or other materials which constitute the record of proceedings upon which the adoption of this proposed amendment is based, which are located at the South Coast Air Quality Management District, 21865 Copley Drive, Diamond Bar, California; and

**WHEREAS**, the SCAQMD Governing Board finds and determines, taking into consideration the factors in section (d)(4)(D) of the Governing Board Procedures (to be codified as Section 30.5(4)(D) of the Administrative Code), that the modifications adopted which have been made to Proposed Amended Rule 1148.1 - Oil and Gas Production Wells since notice of public hearing was published do not significantly change the meaning of the proposed amended rule within the meaning of Health and Safety Code Section 40726; and

**WHEREAS**, the SCAQMD Governing Board has determined that Proposed Amended Rule 1148.1 - Oil and Gas Production Wells, should be adopted for the reasons contained in the Final Staff Report; and

**WHEREAS**, the proposed amendments to Rule 1148.1 - Oil and Gas Production Wells, will not be submitted for inclusion into State Implementation Plans.

**NOW, THEREFORE, BE IT RESOLVED**, that the SCAQMD Governing Board does hereby certify that the Final EA for Proposed Amended Rule 1148.1 was completed in compliance with CEQA and SCAQMD Rule 110 provisions; and finds that the Final EA was presented to the Governing Board, whose members reviewed, considered and approved the information therein prior to acting on Proposed Amended Rule 1148.1; and

**BE IT FURTHER RESOLVED**, that because no significant adverse environmental impacts were identified as a result of implementing Proposed Amended Rule 1148.1, Findings pursuant to Public Resources Code §21081.6 and CEQA Guidelines §15091, a Statement of Overriding Considerations pursuant to CEQA Guidelines §15093, and a Mitigation Monitoring Plan pursuant to Public Resources Code §21081.6 and CEQA Guidelines §15097 are not required; and

**BE IT FURTHER RESOLVED**, that the SCAQMD Governing Board directs staff to evaluate the use of the SCAQMD web page and other communication mechanisms, including integrated use of Geographic Information Systems, to post and disseminate information to the public related to complaint related activities at oil and gas production facilities. In no later than six months, staff shall provide a status report to the Stationary Source Committee, reporting findings and recommendations for the development and implementation of an SCAQMD communication program to better inform the community on complaint related activities at oil and gas production facilities; and

**BE IT FURTHER RESOLVED**, that the SCAQMD Governing Board directs staff to include, through the operation of the SCAQMD Air Quality Sensor Performance Evaluation Center (AQ-SPEC) or other programs, an air quality monitoring demonstration pilot study involving emerging technologies at oil and gas production facility operations. In no later than one year, staff shall provide a status report to the Stationary Source Committee, reporting findings and recommendations for the use of emerging monitoring technologies at oil and gas production facilities; and

**BE IT FURTHER RESOLVED**, that the SCAQMD Governing Board directs staff to conduct a comprehensive review of Best Available Control Technology (BACT) and Best Available Retrofit Control Technology (BARCT) applicable to Oil and Gas Production Facilities. No later than six months, staff shall provide a status report to the Stationary Source Committee, reporting findings and recommendations for the need, if any, for additional emission controls or regulatory efforts; and

**BE IT FURTHER RESOLVED**, that the SCAQMD Governing Board does hereby adopt the proposed amendments to Rule 1148.1 - Oil and Gas Production Wells, pursuant to the authority granted by law as set forth in the attached and incorporated herein by reference.

DATE: \_\_\_\_\_

\_\_\_\_\_  
CLERK OF THE BOARDS

# ATTACHMENT E

(Adopted March 5, 2004)(Proposed Amended July 10, 2015)

## **PROPOSED AMENDED RULE 1148.1. OIL AND GAS PRODUCTION WELLS**

(a) Purpose

The purpose of this rule is to reduce emissions of volatile organic compounds (VOCs), toxic air contaminants (TAC) emissions and Total Organic Compounds (TOC) from the operation and maintenance of wellheads, the well cellars, and the handling of produced gas at oil and gas production facilities to assist in reducing regional ozone levels and to prevent public nuisance and possible detriment to public health caused by exposure to such emissions.

(b) Applicability

This rule applies to onshore oil producing wells, well cellars and produced gas handling operation and maintenance activities at onshore facilities where petroleum and processed gas are produced, gathered, separated, processed and stored. These facilities are also subject to additional rule requirements, including, but not limited to: the storage of organic liquids is subject to Rule 463 – Organic Liquid Storage; wastewater systems, including sumps and wastewater separators are subject to Rule 1176 – VOC Emissions from Wastewater Systems; and leaks from components are subject to Rule 1173 – Control of Volatile Organic Compounds Leaks and Releases from Components at Petroleum Facilities and Chemical Plants. Natural gas distribution, transmission and associated storage operations are not subject to the requirements of this rule.

(c) Definitions

For the purpose of this rule, the following definitions shall apply:

- (1) ABANDONED WELL is a well that has been certified by the California Department of Conservation, Division of Oil, Gas and Geothermal Resources as permanently closed and non-operational.
- (2) CENTRAL PROCESSING AREA is any location within an oil and gas production facility where pressurized phase separation or treatment of produced well fluids, including any produced oil, water or gas, occurs. A location that includes only oil producing wells and associated equipment not involved in pressurized phase separation or treatment, is not considered to be a central processing area.

- (23) COMPONENT is any valve, fitting, pump, compressor, pressure relief device, diaphragm, hatch, sight-glass, or meter in VOC service. Components are further classified as:
- (A) MAJOR COMPONENT is any 4-inch or larger valve, any 5-hp or larger pump, any compressor, and any 4-inch or larger pressure relief device.
- (B) MINOR COMPONENT is any component which is not a major component.
- (34) CONFIRMED ODOR EVENT is an occurrence of odor resulting in three or more complaints by different individuals from different addresses, and the source of the odor is verified by District personnel.
- (5) CONFIRMED OIL DEPOSITION EVENT is an occurrence of property damage due to the airborne release of oil or oil mist from an oil and gas production facility, as verified by District personnel.
- (246) FACILITY is any equipment or group of equipment or other VOC-, TOC- or TAC-emitting activities, which are located on one or more contiguous properties within the District, in actual physical contact or separated solely by a public roadway or other public right-of-way, and are owned or operated by the same person (or by persons under common control). Such above-described groups, if noncontiguous, but connected only by land carrying a pipeline, shall not be considered one facility.
- (57) HEAVY LIQUID is any liquid with 10 percent or less VOC by volume evaporated at 150°C (302°F), determined according to test methods specified in paragraph ~~(h)~~(3) or ~~(h)~~(4).
- (68) LEAK is the dripping of either heavy or light liquid; or the detection of a concentration of TOC above background, determined according to the test method in paragraph ~~(h)~~(1).
- (79) LIGHT LIQUID is any liquid with more than 10 percent VOC by volume evaporated at 150°C (302°F), determined according to the test method specified in paragraph ~~(h)~~(3).
- (810) ODOR is the perception experienced by a person when one or more chemical substances in the air come into contact with the human olfactory nerves.
- (3911) OIL PRODUCING WELL is a well which produces crude oil.
- (1012) ORGANIC LIQUID is any liquid containing VOC.

- ~~(41413)~~ PRODUCED GAS is organic compounds that are both gaseous at standard temperature and pressure and are associated with the production, gathering, separation or processing of crude oil.
- ~~(1214)~~ RESPONSIBLE PARTY for a corporation is a corporate officer. A responsible party for a partnership or sole proprietorship is the general partner or proprietor, respectively.
- ~~(51315)~~ SENSITIVE RECEPTOR ~~is a school~~ (means any residence including private homes, condominiums, apartments, and living quarters; education resources such as preschools and kindergarten through grade twelve (k-12) schools; licensed daycare centers; and health care facilities such as hospitals, or convalescent home retirement and nursing homes. A sensitive receptor includes long term care hospitals, hospices, prisons, and dormitories or similar live-in housing.
- ~~(4116)~~ SPECIFIC CAUSE ANALYSIS is a process used by an owner or operator of a facility subject to this rule to investigate the cause of a confirmed odor event or confirmed oil deposition event, identify corrective measures and prevent recurrence of a similar event.
- ~~(61517)~~ STUFFING BOX is a packing gland, chamber or “box” used to hold packing material compressed around a moving pump rod to reduce the escape of gas or liquid.
- ~~(71618)~~ TOTAL ORGANIC COMPOUNDS (TOC) is the concentration of gaseous organic compounds determined according to the test method in paragraph ~~(gh)~~(1).
- ~~(1719)~~ TOXIC AIR CONTAMINANT (TAC) is an air contaminant that has been identified as a hazardous air pollutant pursuant to Section 7412 of Title 42 of the United States Code; or has been identified as a TAC by the Air Resources Board pursuant to Health and Safety Code Section 39655 through 39662; or which may cause or contribute to an increase in mortality or an increase in serious illness, or potential hazard to human health.
- ~~(81820)~~ VOLATILE ORGANIC COMPOUND is as defined in Rule 102 – Definition of Terms.
- ~~(4921)~~ WASTEWATER is a water stream or other liquid waste stream generated in a manner which may contain petroleum liquid, emulsified oil, VOC, or other hydrocarbons.

(2022) WATER INJECTION WELL is a bored, drilled, or driven shaft, or a dug hole that is deeper than it is wide, or an improved sinkhole, or a subsurface fluid distribution system used to inject fluid consisting primarily of water into a reservoir typically to create fluid lift of product or maintain reservoir pressure.

(92423) WELL CELLAR is a lined or unlined containment surrounding one or more oil wells, allowing access to the wellhead components for servicing and/or installation of blowout prevention equipment.

(402224) WELLHEAD is an assembly of valves mounted to the casing head of an oil well through which a well is produced. The wellhead is connected to an oil production line and in some cases to a gas casing line.

(d) Requirements

(1) The operator of an oil and gas production facility shall not allow a concentration of a TOC in the well cellar greater than 500 ppmv, according to the test method in paragraph (h)(1). ~~in the well cellar.~~

(2) ~~Effective July 1, 2004, the~~ The operator of an oil and gas production facility shall not allow any valve to be opened at the wellhead unless a portable container is used to catch and contain organic liquid that would otherwise drop into the well cellar or onto the ground. Such container shall be kept closed to the atmosphere when it contains organic liquid and is not in use.

(3) If a well cellar is verified by District personnel as the source of odors associated with three or more complaints by different individuals from different addresses in a single day, the operator of an oil and gas production facility shall pump out or remove organic liquid accumulated in the well cellar as soon as possible but no later than by the end of the day.

(34) The operator of an oil and gas production facility shall not allow organic liquid to be stored in a well cellar, except as provided by paragraph (d)(45). During any periods of equipment maintenance, drilling, well plugging, abandonment operations, or well workover, the operator shall pump out or remove organic liquid that accumulates in the well cellar no later than two (2) days after the maintenance, drilling, well plugging, abandonment or workover activity at the well is completed.

- (45) The operator may only store organic liquid in a portable enclosed storage vessel ~~provided if~~ the vessel is equipped with air pollution control equipment to reduce the TOC emissions to less than 250 ~~ppm~~ppmv outlet concentration according to the test method in paragraph ~~(ghj)~~(ghj)(1), except use of air pollution control equipment is not required where safety requirements established in a written company safety manual or policy deem it impractical during maintenance, plugging, abandonment, well workover or drilling operations. activities determined to meet the exemption criteria of paragraph (ij)(2). The operator shall conduct a TOC measurement according to the test method in paragraph ~~(ghj)~~(ghj)(1) at the time of filling, and weekly thereafter to ensure that the air pollution control system achieves the emission standard of 250 ppmv.
- (456) The operator of an oil and gas production facility shall pump out ~~the any~~ organic liquid accumulated in the well cellar immediately before a well is steamed or after a wellhead is steam cleaned.
- (567) The operator of an oil and gas production facility shall pump out or remove organic liquid accumulated in the well cellar ~~within five (5) calendar days, or by close of the following business day if the well cellar is located within 100 meters of a sensitive receptor when the TOC concentration in the well cellar is greater than 250 ppm~~ppmv as determined by the test method in paragraph (ghj)(1); within five (5) calendar days following the determination, or if the well cellar is located within 1,500 feet of a sensitive receptor, by close of the following business day. In lieu of the method in paragraph ~~(ghj)~~(ghj)(1), an operator may measure the depth of accumulated organic liquid and pump-out the liquid when the depth exceeds two (2) inches. The organic liquid depth may be measured using a “copper coat” gauge or any other measuring instrument determined to be acceptable by the Executive Officer.
- (678) ~~Effective January 1, 2006, the~~The operator of an oil and gas production facility shall not allow natural gas or produced gas to be vented into the atmosphere. The emissions of produced gas shall be collected and controlled using one of the following:
- (A) A system handling gas for fuel, sale, or underground injection; or
  - (B) A device, approved by the Executive Officer, with a VOC vapor removal efficiency demonstrated to be at least 95% by weight per test method of paragraph ~~(ghj)~~(ghj)(2) or by demonstrating an outlet



VOC concentration of 50 ~~ppm~~ ppmv according to the test method in paragraph ~~(g)(1)~~ (1) or by an equivalent demonstration identified in an approved permit issued on or after March 5, 2004, pursuant to Rule 203 – Permit to Operate. If the control device uses supplemental natural gas to control VOC, it shall be equipped with a device that automatically shuts off the flow of natural gas in the event of a flame-out or pilot failure.

~~(789)~~ Except as Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants applies to components of produced gas handling equipment located within 100 meters of a sensitive receptor, the operator shall repair any gaseous leaks of 250 ppmv TOC or greater by the close of the business day following the leak discovery or take actions to prevent the release of TOC emissions to the atmosphere until repairs have been completed.

~~(8910)~~ Effective ~~March 5, 2004,~~ ~~unless~~ Unless approved in writing by the Executive Officer, CARB, and USEPA as having no significant emissions impacts, no person shall:

(A) Remove or otherwise render ineffective a well cellar at an oil and gas production well except for purposes of well abandonment to be certified by the California Department of Conservation, Division of Oil, Gas and Geothermal Resources; or

(B) Drill a new oil and gas production well unless a well cellar is installed for secondary containment of fluids.

~~(1011)~~ Effective *(30 days after adoption)* the operator of an oil and gas production facility shall utilize a rubber grommet designed for drill piping, production tubing or sucker rods to remove excess or free flowing fluid from piping, tubing or rods that ~~is~~ are removed during any maintenance or ~~drill-piping, tubing or rod replacement~~ activity that involves the use of a workover rig.

~~(1412)~~ Effective *(180 days after adoption)* the operator of an oil and gas production facility shall, for any central processing area located within 1,500 feet of a sensitive receptor, operate and maintain a monitoring system that alarms or notifies operators of key process conditions, such as operating pressure, liquid level or on/off operating status, or a monitoring system that is required in accordance with applicable local fire regulations, in order to ensure proper facility operation. The monitoring system will

shall alarm and or notify operators at a central location, or control center, or other common area. The owner or operator shall identify and document the monitored process parameters or monitoring system required by applicable local fire regulations and shall make such documentation available for inspection upon request. The monitoring system will incorporate any emissions or process monitoring and associated alarm thresholds identified in any approved SCAQMD operating permit or Odor Mitigation Plan approved in accordance with the provisions of paragraph (f)(2).

(12)13) Effective (30 days after adoption) the operator of an oil and gas production facility shall post instructions for reporting odor complaints. The posted instructions shall be provided in a conspicuous manner and under such conditions as to make it likely to be read or seen and understood by an ordinary individual during both normal operating and non-operating hours. The instructions shall include the following minimum information in English and Spanish:

(A) Name of the facility;

(B) Facility call number; and,

(C) Instructions to call the South Coast Air Quality Management District complaint hotline at the toll free number 1-800-CUT-SMOG or equivalent information approved in writing by the Executive Officer.

(e) Operator Inspection Requirements

(1) Effective July 1, 2004, theThe operator of an oil and gas production facility shall visually inspect:

(A) Any stuffing box not located in or above a well cellar daily;

(B) Any stuffing box located in or above a well cellar weekly; or

(C) Any stuffing box or produced gas handling and control equipment located ~~400 meters~~1,500 feet or less from a sensitive receptor daily. Receptor distance shall be determined as the distance measured from the stuffing box or produced gas handling and control equipment to the property line of the nearest sensitive receptor.

(2) Notwithstanding the requirements of subparagraphs (e)(1)(A) and (e)(1)(B), the operator shall perform monthly visual inspections of any

stuffing box fitted with a stuffing box adapter, any closed crude oil collection container, and any well shut off switch that will shut down the well when the container is full.

- (3) ~~Effective, July 1, 2004, except~~ Except for well cellars listed under subdivision (h~~i~~), the operator shall quarterly, perform an inspection of all well cellars according to the test method in paragraph (g~~h~~i)(1).
- (4) Within two (2) days of discovery of organic liquid leakage observed from the inspections pursuant to subparagraph (e)(1)(A), (e)(1)(B), or paragraph (e)(1)(A) or (e)(1)(B)2, and within eight (8) hours pursuant to ~~paragraph~~subparagraph (e)(1)(C), the operator shall conduct an inspection of the stuffing box and well cellar according to the test method in paragraph (g~~h~~i)(1) or measure the organic liquid depth using a “copper coat” gauge or any other measuring instrument determined to be acceptable by the Executive Officer.
- (5) Notwithstanding the provisions of Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants, the operator of an oil and gas production facility shall conduct a monthly TOC measurement on any component that has been identified as causing or likely to have caused the confirmed odor event a potential odor nuisance source through a submitted specific cause analysis report submitted in accordance with the provisions of subdivision (f). The TOC measurement shall be conducted monthly according to the test method in paragraph (i)(1) following submittal of the specific cause analysis report, until the measurement fails to exceed the leak rates identified in subparagraphs (e)(5)(A) and (e)(5)(B) for six consecutive months. The operator shall repair, replace or remove from service the component in accordance with the requirements of subparagraphs (e)(5)(A) and (e)(5)(B).
  - (A) Any heavy liquid component leak of more than three drops per minute and greater than 100 ppmv shall be repaired, replaced or removed from service in one (1) calendar day.
  - (B) Any light liquid/gas/vapor/component leak greater than 500 ppmv but no more than 10,000 ppmv shall be repaired, replaced or removed from service in one (1) calendar day.

~~(f)~~ — Odor Mitigation Requirements~~(4f)~~ Specific Cause Analysis and Report

Effective (date of adoption) the owner or operator of any oil and gas production facility with any sensitive receptor within 1,500 feet of any well located on the facility property shall conduct a Specific Cause Analysis for each confirmed odor event and for each confirmed oil deposition event. The Specific Cause Analysis shall describe the steps taken to identify the source and cause of the odor or confirmed oil deposition event, and any mitigation and corrective actions taken or identified. The owner or operator shall, within 30 calendar days following receipt of written notification of a confirmed odor event or confirmed oil deposition event from the Executive Officer, submit the Specific Cause Analysis report to the Executive Officer, certified by the Responsible Party that all information submitted is true and correct.

(A1) The submitted Specific Cause Analysis report shall include the following:

(iA) Identification of the equipment or activity causing or likely to have caused the confirmed odor event or confirmed oil deposition event, including any equipment or activity identified in the written notification of a confirmed odor event or confirmed oil deposition event by the Executive Officer.

(iiB) Any SCAQMD regulatory requirement associated with the equipment or activity causing or likely to have caused the confirmed odor event or confirmed oil deposition event, including but not limited to, any permit condition and any other SCAQMD rule, including this rule.

(iiiC) Identification of any Standard Operating Procedure, emergency or leak prevention plan, including any spill prevention plan, preventative maintenance scheduling or procedure associated with the source of the confirmed odor event or confirmed oil deposition event and any corrective action identified as part of the review and update pursuant to subparagraph (f)(1)(B)(2) and schedule for completion of the corrective action.

(B2) The owner or operator shall review and update the following as part of the Specific Cause Analysis:

(iA) Any Standard Operating Procedures associated with normal production operations and the leak history of inspections

associated with the source of the confirmed odor event or confirmed oil deposition event.

(iiB) Any emergency or leak prevention plans, including any spill prevention plans associated with the source of the confirmed odor event or confirmed oil deposition event.

(iiiC) Any preventative maintenance scheduling or procedures associated with the source of the confirmed odor event or confirmed oil deposition event.

(2g) Odor Mitigation Plan

Effective (date of adoption); the owner or operator of any oil and gas production facility shall submit for approval an Odor Mitigation Plan, or an update to an existing Odor Mitigation Plan, to the Executive Officer within 90 calendar days following receipt of written notification from the Executive Officer.

(A1) Requirement for a Plan Submittal

The Executive Officer shall notify the owner or operator of any oil and gas production facility with any sensitive receptor within 1,500 feet of any well located on the facility property of the requirement for an Odor Mitigation Plan if any of the following thresholds are met or exceeded:

(iA) Receipt of a Notice of Violation for Rule 402 – Nuisance, as a result of odors; or

(iiB) Three (3) confirmed odor events within the previous six (6) consecutive calendar months.

(iiiC) Subsequent to approval of an Odor Mitigation Plan:

(i) Receipt of a Notice or Violation for Rule 402 – Nuisance, as a result of odors; or

(Hii) Three (3) confirmed odor events within the most recent six (6) consecutive calendar months following the date of approval of a previous Odor Mitigation Plan.

(B2) Odor Mitigation Plan Elements

An approved Odor Mitigation Plan must include and address the following activities and equipment:

(iA) Oil and gas production and wastewater generation, including both normal and spill or release management control operations, with corresponding identification of potential or actual sources of emissions, odors, frequency of operator inspection and history of leaks.

(iiB) Activity involving drilling, well completion or rework, repair, or maintenance of a well, which notes the sources of emissions, odors, odor mitigation measures for responding to odors and odor complaints, and procedures used for odor monitoring at the site and fence line.

(iiiC) Identification of emission points and emission or leak monitoring used for all wastewater tanks, holding, knockout, and oil/water separation vessels, including any pressure relief devices or vacuum devices attached to the vessels, with provisions for recording of releases from such devices.

(ivD) Any equipment or activity identified as part of any previous Specific Cause Analysis.

(E3) Odor Monitoring and Mitigation Requirements

An approved Odor Mitigation Plan must include the following odor monitoring and mitigation provisions:

(iA) The owner or operator shall conduct continual odor surveillance downwind at the perimeter of the property at all times during drilling, well completion, or rework, repair, or maintenance of any well, including water injection wells. Observations shall be recorded hourly. Equivalent odor monitoring equipment may be used in lieu of odor surveillance, subject to approval by the Executive Officer.

(iiB) If odors are detected from odor surveillance or odor monitoring at the perimeter of the facility, pursuant to ~~clause (f)(2)(C)(i)~~ subparagraph (g)(3)(A) and confirmed from drilling, well completion, or rework, repair, or maintenance of any well, the associated activity will discontinue until the source or cause of odors ~~are~~ is determined and mitigated in accordance with measures previously approved unless the source or cause of the detected odors is determined to not be associated with the activity under surveillance.

(iiiC) The oil and gas production facility shall store any removed drill piping, production tubing ~~and drill or sucker rods~~ in a manner that minimizes emissions from crosswinds ~~through use of a covering,~~ by storing within an enclosed area, or other equivalent method.

- ~~(iv)~~D) Notwithstanding the provisions of Rule 1173 - Control of Volatile Organic Compounds Leaks and Releases from Components at Petroleum Facilities and Chemical Plants, the operator of any oil and gas production facility shall repair, replace or remove from service any leaking component located within 1,500 feet of a sensitive receptor in accordance with the requirements of subparagraphs clauses ~~(f)(2)(C)(iv)(I)~~ ~~(g)(3)(D)(i)~~ and ~~(f)(2)(C)(iv)(II)~~ ~~(g)(3)(D)(ii)~~. For each calendar quarter, the operator may extend the repair period, as indicated below, for a total number of leaking components not to exceed 0.05 percent of the number of components inspected during the previous quarter, by type, rounded upward to the nearest integer where required.
- ~~(i)~~i) Any heavy liquid component leak of more than three drops per minute and greater than 100 ppmv shall be repaired, replaced or removed from service in one (1) calendar day with an extended repair period of three (3) calendar days.
- ~~(Hii)~~Hii) Any light liquid/gas/vapor component leak greater than 500 ppmv but no more than 10,000 ppmv shall be repaired, replaced or removed from service in one (1) calendar day with an extended repair period of three (3) calendar days.
- ~~(v)~~E) Any corrective action identified in a Specific Cause Analysis report previously submitted by the facility.
- ~~(F)~~F) The owner or operator shall evaluate the cause or likely cause of any confirmed odor event as identified in any Specific Cause Analysis report previously submitted by the facility and identify either improvements to existing monitoring systems required pursuant to paragraph (d)(12) or parameters for a new monitoring system installation. The owner or operator shall establish an installation and implementation schedule for any monitoring system improvements or new installations, subject to Executive Officer approval.

If any provision of subparagraph ~~(f)(2)(C)~~ ~~(g)(3)~~ is not included in the Odor Mitigation Plan, an evaluation and documentation must be provided in the Odor Mitigation Plan that states the reason why such provision is not feasible or would not be effective in addressing the specific cause of the confirmed odor events or notice(s) of violation that resulted in the

requirement for plan submittal, subject to approval by the Executive Officer.

(D4) The owner and operator of an oil and gas production facility shall comply with all provisions of an approved Odor Mitigation Plan, except as provided by paragraph (ij)(2). Violation of any of the terms of the plan is a violation of this rule.

(fgh) Recordkeeping Requirements

(1) The operator shall maintain all records that document the purchase and installation of the stuffing box adapter(s) to demonstrate compliance with paragraph (e)(24) at the facility or facility headquarters and such records shall be made available to the Executive Officer upon request.

(2) The operator shall maintain all records of inspection, measurements, repair, cleaning and pump-outs required by this rule, and of any activities performed under the exemption provided by (ij)(2), in a form approved by the Executive Officer at the facility or facility headquarters for a period of three years or a period of five years for a Title V facility and such records shall be made available to the Executive Officer upon request.

(3) The operator shall maintain production records and other applicable information and documents, including any referenced established written company safety manual or policy, sufficient to demonstrate eligibility for any exemption claimed pursuant to subdivision (hi) and make them available to the Executive Officer upon request.

(4) The operator shall maintain all records and other applicable documents required as part of an Odor Mitigation Plan approved in accordance with paragraph (f)(2) subdivision (g) in a form approved by the Executive Officer at the facility or facility headquarters for a period of three years or a period of five years for a Title V facility and such records and applicable documents shall be made available to the Executive Officer upon request.

(ghi) Test Methods

The following test methods and procedures shall be used to determine compliance with this rule. Other test methods determined to be equivalent after review by the staffs of the District, the Air Resources Board, and the U.S. EPA, and approved in writing by the District Executive Officer may also be used.



- (1) Measurement of TOC or VOC concentrations shall be conducted according to the United States Environmental Protection Agency (USEPA) Reference Method 21 using an appropriate analyzer calibrated with methane. The analyzer shall be calibrated before inspection each day prior to use. For the purpose of demonstrating compliance with the TOC concentration requirements in paragraphs (d)(1) and (d)(~~567~~), measurement of the TOC concentrations shall be conducted at a distance of no more than three (3) inches above the organic liquid surface in the well cellar.
- (2) Determination of Efficiency of Emission Control Systems  
The control equipment efficiency of an emission control system, on a mass emissions basis, and the VOC concentrations in the exhaust gases, measured and calculated as carbon, shall be determined by USEPA Test Methods 25, 25A, or District Method 25.1 - Determination of Total Gaseous Non-Methane Organic Emissions as Carbon or District Method 25.3 Determination of Low Concentration Non-Methane Non-Ethane Organic Compound Emissions from Clean Fueled Combustion Sources, as applicable. US EPA Test Method 18; or ARB Method 422 shall be used to determine emissions of exempt compounds.
- (3) The VOC content shall be determined according to ASTM Method D 1945 for gases, SCAQMD Method 304-91 for liquids. The percent VOC of a liquid evaporated at 150°C (302°F) shall be determined according to ASTM Method D 86.
- (4) The flash point of heavy liquids shall be determined according to ASTM Method D 93.
- (~~3~~5) Laboratory Approval  
Sampling, analysis, and reporting shall be conducted by a laboratory that has been approved under the District Laboratory Approval Program (LAP) for the cited District reference test methods, where LAP approval is available. For District reference test methods for which no LAP program is available, the LAP approval requirement shall become effective one year after the date that the LAP program becomes available for that District reference test method.
- (4) ~~Equivalent Test Methods~~  
~~A person may use other methods to determine compliance with this rule provided it is demonstrated to be equivalent and approved in writing by~~

~~the Executive Officers of the District, the California Air Resources Board, and the Regional Administrator of the USEPA, or their designees.~~

(~~hi~~) Exemptions

- (1) This rule shall not apply to well cellars associated exclusively with:
  - (A) Oil and gas production wells that have been idle and out of operation for more than six months, as indicated by production records, with no liquid leaks or accumulation of crude oil in the well cellar ~~as indicated by production records~~. All provisions of this rule shall apply upon commencement of operation of the idle well.
  - (B) Wells that have been certified as an abandoned well by the California Department of Conservation, Division of Oil, Gas and Geothermal Resources.
  - (C) Water, gas or steam injection wells.
- (2) The provisions of paragraphs ~~(d)(3), (d)(545), (d)(6), (d)(7), and (d)(78), (d)(9) and subparagraph (f)(2)(C)~~ paragraph (g)(3) shall not apply to any well ~~or~~, produced gas handling system, or portable enclosed storage vessel and associated air pollution control equipment undergoing maintenance and repair, well drilling ~~and~~, or well abandonment operations, ~~provided if~~ the owner or operator can demonstrate to the Executive Officer that: performing the maintenance and repair, drilling, or abandonment operation to meet paragraph (d)(3)(d)(45), ~~(d)(6), (d)(7), or (d)(8), (d)(9), or paragraph (g)(3), as applicable, would cause the facility to operate in a manner that violates state or federal regulations, applicable industry safety standards, or a written company safety manual or policy that was developed to comply with applicable industry safety standards; and that the maintenance and repair, drilling, or abandonment operation is conducted in a manner that minimizes, as much as possible under the circumstances, emissions to the atmosphere, and is consistent with the written company safety manual or policy.~~
- (3) The provisions of paragraph (d)(1), (d)(2) and ~~(d)(567)~~ shall not apply to any well cellar used in emergencies at oil production facilities, if clean-up procedures are implemented within 24 hours after each emergency occurrence and completed within ten (10) calendar days.

- (4) The provisions of paragraph (d)(~~678~~) of this rule shall not apply to oil and gas production wells in operation as of March 5, 2004, that produce no more than one (1) barrel per day of oil or 200 standard cubic feet per day of produced gas per facility, provided that such production wells are not located within 100 meters of a sensitive receptor, and provided the production can be demonstrated from annual production records. Demonstration of produced gas production shall be based on metered measurement of the gas.

# ATTACHMENT F

## SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

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### Final Staff Report

### Proposed Amended Rule 1148.1 – Oil and Gas Production Wells

July 2015

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Planning, Rule Development, & Area Sources  
Philip M. Fine, Ph.D.

#### Assistant Deputy Executive Officer

Planning, Rule Development, & Area Sources  
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Speaker of the Assembly Appointee

Vice Chairman: DENNIS YATES  
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Cities of San Bernardino County

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## **APPENDICES**

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- Appendix B. Sampling of Complaint History (2010 – 2014) – Oil and Gas Production Facilities
- Appendix C. PAR 1148.1 (d)(~~12~~13) – Sample Information Signage

### EXECUTIVE SUMMARY

Rule 1148.1 – Oil and Gas Production Wells was adopted on March 5, 2004 to reduce volatile organic compound (VOC) emissions from well cellars as well as from sources of untreated process gas located at oil and gas production facilities. The rule includes requirements for visual inspection and maintenance programs and for controlling untreated produced gas. An increased awareness of oil and gas production wells due to community concerns over potential environmental impacts from well stimulation techniques such as hydraulic fracturing has resulted in a goal to minimize impacts to nearby residents and sensitive receptors from ongoing operations ~~that do not include drilling~~. In addition, between the years 2010 and 2014, operations at Allenco Energy Inc., an oil and gas production facility located adjacent to several sensitive receptors, had become the subject of close to 300 complaints, over 150 inspections and eighteen Notices of Violation (NOV), including six NOV's for Rule 402 – Nuisance due to odors. This further heightened awareness from the local community and other interested stakeholders, raising interest in pursuing environmental justice measures to both more rapidly respond to and prevent future situations from evolving at similarly located operations. The proposed amendment seeks to include additional prevention measures and other best practices in an effort to reduce the potential for odor nuisance and exposures from oil and gas production facilities, especially those within 1,500 feet of a sensitive receptor. Further, the proposed amendment seeks to make administrative changes to the rule by removing obsolete rule language and making minor revisions.

~~The proposed amendment incorporates some of the information gathered through the reporting mechanisms provided by Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers adopted, April 5, 2013. The South Coast Air Quality Management District (SCAQMD) intends to further refine and analyze the data obtained from implementation of Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers as part of a subsequent effort to report findings and recommendations for the need, if any, for emission controls or regulatory efforts related to well drilling, well completion, and well rework.~~

As a separate, but concurrent effort, proposed amendments to Rule 1148.1 address the ~~production operation~~ and maintenance aspects of an ~~operating~~ oil and gas ~~well production facility~~, rather than the pre-production or stimulation aspects covered under the requirements of Rule 1148.2.

Currently production wells, primarily due to low emission potential, are currently registered under Rule 222 - Filing Requirements For Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II and do not require full permits. However, if these same wells have associated equipment (i.e. separation tanks, wastewater separators), the facility requires a comprehensive analysis under Rule 203 - Permit to Operate, and subject to Regulation XIII requirements, as applicable.

There is no anticipated significant cost increases associated with the proposed amendment because the amended rule focuses on improving work practices and establishing odor mitigation procedures as a contingency, rather than on additional engineering controls. Any additional cost impact associated with implementation of improved work practices, specific cause analyses and odor mitigation procedures are expected to be administrative and nominal.

## BACKGROUND

### Introduction

The process of moving oil and gas from underground reservoirs to above ground storage is described as a “pipeline process” since oil and gas in its natural state uses natural pressure or mechanical forces to move the oil and gas through miles of pipeline to the wellhead and is then transported by more piping to storage. In the life of an oil well, there are phases which dictate the type of equipment to be used and the work practices and maintenance procedures that will be implemented. These operations have been historically regulated and permitted by the California Division of Oil, Gas and Geothermal Resources (DOGGR). The phases include: exploration, well development, production and well abandonment. Rule 1148.1 applies principally to the production phase, whereas Rule 1148.2 applies to the exploration, well development and well rework phases. DOGGR continues to regulate site abandonment activities.

Figure 1 below outlines the overall oil and gas well lifecycle and the associated regulatory applicability with respect to activities covered under Rule 1148.1 and Rule 1148.2:

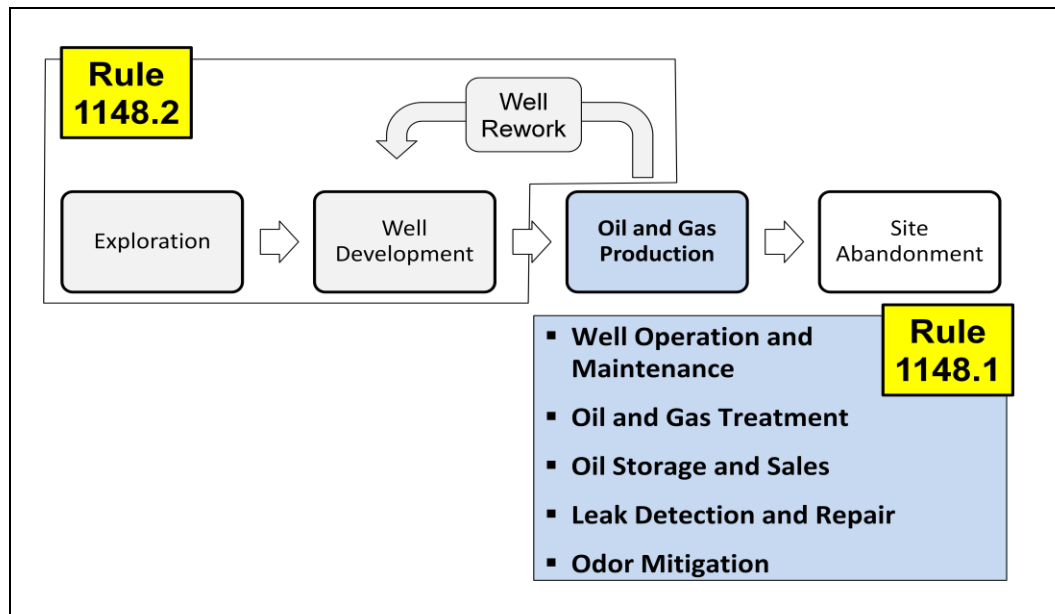


Figure 1. Typical oil and gas production facility processes and SCAQMD rule applicability

### Exploration

Exploratory wells are drilled into underground formations in hopes of locating a new source of fossil fuel. This type of well represents a risk for the company conducting the drilling, not only for the high cost, but also due to the uncertainty in the quantity of oil or natural gas it might contain. The well may turn out to be a profitable new source of fossil fuel, or it may contain quantities of fuel that are not profitable to extract. In the latter case, the well may be plugged and abandoned.

When oil deposits are discovered, a crude oil reservoir can contain a mixture of water, as well as oil and gas in the small pore spaces in the reservoir rock. Initially, the reservoir holds these fluids under considerable pressure, caused by the hydrostatic pressure of the groundwater. At this pressure, a large part of the gas is dissolved in the oil. These two fluids, the initial water and the gas in solution, combine to provide the driving force for moving the oil into the well where it is pushed upward by the underlying pressure.

This operation is the subject of Rule 1148.2.

### Well Development

Development wells are typically drilled within an area that has already proven to be productive. Once oil or gas is discovered in a commercially viable quantity, development wells are drilled to continue to recover as much of the oil or gas as possible. There are also service wells which are drilled for injecting liquids or gases into an underground formation in order to increase the pressure and force the oil toward the producing wells. Service wells also include wells drilled for the underground disposal of water produced with the oil and gas.

This operation is also the subject of Rule 1148.2.

### Production

After drilling, an oil well is constructed essentially as a pipeline, reaching from the top of the ground to the oil-producing formation. It is through this pipe that oil is brought to the surface. The pipeline is a series of joints of a special kind of pipe (casing) screwed together to form a continuous tube for the oil and gas to flow through. Sometimes in drilling a well, more than one commercially productive formation is found. In such cases, a separate tubing string is run inside the casing for each productive formation. Production from the separate formations is directed through the proper tubing strings and is isolated from the others by packing that seals the annular space between the tubing strings and casing. These are known as multiple completion wells.

The production stage is the most important stage of a well's life, when the oil and gas are produced. By this time, the rigs used to drill and complete the well have moved off the wellbore, and the top is usually outfitted with a collection of valves called a "Christmas tree" or production tree. These valves regulate pressures, control flows, and allow access to the wellbore in case further completion work is needed. From the

outlet valve of the production tree, the flow can be connected to a distribution network of pipelines and tanks to process the produced oil, gas and water, and subsequently supply the product to refineries, natural gas compressor stations, or oil export terminals.

As long as the pressure in the reservoir remains high enough, the production tree is all that is required to produce the well. If the pressure depletes and it is considered economically viable, an artificial lift method can be employed to withdraw the remaining product from the reserve.

Currently there are four common methods of artificial lift used in the industry today: they are beam pumping, submersible pumping, gas lift and hydraulic pumping.

For beam pumping, the pump is designed to be inserted inside the tubing of a well and its main purpose is to gather fluids from beneath the surface and lift them to the surface. The most important components are the barrel, valves (traveling and fixed) and the piston. The pump is connected to the pumping unit at the surface by a string of sucker rods. Sucker rods are stroked up and down the tubing, activating the pump at the bottom. At the surface a large mechanical device called the beam pumping unit is attached. Depending on the size of the pump, it generally produces 5 to 40 liters of liquid at each stroke. Often this is an emulsion of crude oil and water. One of the advantages of beam pumping is high efficiency; however, it is limited to relatively low production volumes, less than 1,000 barrels per day (bpd).

Submersible pumping consist of an electrical motor attached to a pump on the end of the tubing string. The electrical motor turns a centrifugal pump, which forces oil from the bottom of the well, up through the inside of the tubing, and out at the surface. The electricity is supplied through an electric cable attached to the side of the tubing and connected to the electric motor. The Submersible Pumping has high volume and depth capacity and high efficiency over 1,000 bpd. However, this type of artificial lift has poor ability to pump sand.

Another type of artificial lift is gas lift, which involve a series of devices called gas lift valves that are inserted into the sides of the tubing. The gas is injected into the well through the tubing casing annulus and enters the tubing through the gas lift mandrels and gas lift valves. The fluid in the tubing is made lighter by the gas, and as a result, the mixture is pushed to the surface by the reservoir pressure. The advantage of using gas lift equipment is that the process closely resembles the natural flow process and basically operates as an enhancement or extension of that process. The only major requirement is an available and economical supply of pressurized gas. The draw back in using this system is high initial capital cost, high level of maintenance and complex operation.

The last artificial lift method is hydraulic pumping where high pressure oils are pumped into the well through the tubing string. At the bottom of the well, the pressured oil enters a mechanical device, causing it to reciprocate. This mechanical device activates a pump which lifts the oil from the producing formation, together with expended powered oil to the surface. The system consists of a surface power

fluid system, a prime mover, a surface pump, and a down hole jet or pump. Power fluid from the surface actuates the engine, which in turn drives the pump and power fluid returns to the surface with the produced oil. The Advantages of hydraulic pumping is that there are no moving parts and high volume capability. The downside is the high initial capital cost and the difficulty of operation.

This operation is subject to Rule 1148.1.

### Site Abandonment

Once a production well oil and gas reservoir is depleted, the well is abandoned and the site is cleaned up. Requirements include plugging the depleted reservoir hole with cement to protect all underground strata. This prevents any flow or leakage at the surface and protects the water zone, in accordance with California Code of Regulations, Subchapter 4, and section 1920.1. Equipment that is salvageable is removed; pits used in the operation are filled in and the site is re-graded. Wherever practical the ground is replanted with grass or other kinds of vegetation and sometimes, buildings are constructed on the site.

This activity is regulated by DOGGR.

### Ancillary

There are additional ancillary procedures and equipment that are used across all phases of oil and gas production, including overall facility and equipment maintenance and spill containment and spill response. The emissions related aspects of these activities are subject to Rule 1148.1.

### Maintenance

Maintenance is necessary and required to ensure smooth operation in a safe manner and to minimize emissions during all phases of oil well operations. General maintenance includes repairing or replacing pull rods or well casings using workover rigs, as well as inspecting and repairing pumps and other equipment used in production.

### Spill Containment and Spill Response

Oil and gas production facilities utilize various forms of spill control and countermeasures to address handling of hazardous materials. Primary containment consists of a permanent structure that holds the hazardous material (oil), such as tanks and piping. In many cases well cellars are used to provide secondary containment. On-shore oil and gas production facilities are also subject to federal requirements for spill control under 40 CFR part 112.

### Typical Emission Sources

#### Wellheads

Wellheads are susceptible to liquid leaks especially where the stuffing box is or large valves are poorly maintained ~~or when large valves are opened and then closed~~, which

~~often produces a~~ can result in noticeable amount of liquids, including hydrocarbons. If the liquid is allowed to stand ~~over an extended period~~, VOC emissions and related odors may be released to the atmosphere, and may lead to odor nuisance complaints from the local community.

### Well Cellars

In most cases the wellhead resides in or above the well cellar, a small subsurface containment basin used to capture any leaking liquid from oil and gas extraction or maintenance or from workover of the well or wellhead. Well cellars can be lined or unlined and there can be one or more wellheads allocated to a well cellar. On average, a well cellar has approximate dimensions of 6 feet by 6 feet with a depth of between 5 feet to 8 feet. Since there needs to be access to wellheads for maintenance and sampling, well cellars are uncovered and can become sources of VOC emissions and associated odors when crude oil is collected and retained in this containment area ~~for an extended period of time~~.

### Separation and Treatment

After the well fluids and gas reach the wellhead they are transferred to a treatment plant. At the treatment plant, the crude oil, natural gas, produced water and solid contaminants are separated and treated. A treatment plant may be simple or complex and can take many different forms depending on treatment needs. Typically, the treatment plant includes a well flow-line manifold in addition to separators, free water knockout vessels, heaters (if crude is heavy), heater-treaters, wash tanks, stock tanks, wastewater separators or oil/water separators, sumps, pits, ponds and a vapor recovery unit.

Some of the equipment that require permits by the SCAQMD include ~~American Petroleum Institute (API)~~ large oil/water separators, tanks, vessels, heaters, boilers, vapor recovery units, internal combustion engines and clean-out sumps, which are in most cases part of the wastewater system permit unit, oil dehydration unit or water injection facilities. Open ditches also require a permit, but there are no active permits currently in the South Coast Air Basin. Wastewater associated with the separation and treatment process is regulated by Rule 1176 – VOC Emissions from Wastewater Systems adopted November 3, 1989.

The well fluids (oil/water) and gas mixture flows to a well manifold that connects with each well in the field. From the manifold, the mixture is directed to either a test or a production separator, which separates and measures the three phases separately and is used to determine the production of each well. Under normal conditions, the mixture flows to a production separator or free water knockout where gas is separated from the mixture. From there, the oil/water stream flows to a free water knockout vessel, a heater treater, a wash tank and an oil/water separation vessel where water is removed from the oil. After it is determined that there is a sufficient reduction of water content, the oil flows to an oil storage or stock tank. Upon sale, the oil flows through Lease Automated Custody Transfer (LACT) units for metering.

Gases removed from the oil during treatment may be further treated and then 1) sold to a utility; 2) used as fuel by the operator; 3) re-injected into the reservoir for pressure maintenance; or 4) vented to the atmosphere, a practice largely eliminated by the requirements of Rule 1148.1 which provides for the use of air pollution control devices in lieu of venting, except in the case of emergency upset conditions or certain smaller producing wells. Gas collected from separators and oil treaters, along with vapors from storage tanks, may be processed through a glycol dehydration unit. This unit removes the water from the gas before it is put into a sales pipeline or used ~~again in the dehydration process~~ as fuel, or re-injected into the subsurface. A common practice to control production gas from small to medium operations is to use a gas-fired heater that burns the facility's gas and produces heat to reduce the viscosity of the crude oil product. . Reducing the viscosity of crude oil facilitates the handling within the production operation or the transport via pipeline to the refineries. Some facilities use the production gas to fuel micro-turbines for onsite power needs. However, based on a review of permitted oil and gas production facilities, ten facilities have a permit for flares that may be used to burn excess or off specification gas.

The oily water collected from the separators and the oil treaters may flow directly to a sump or may flow to a water treatment facility prior to disposal. At the water treatment facility, the oil content of the water is reduced by skimming tanks, dissolved air flotation units, pits, filters or a combination of these. The water may be used on-site, discharged to the surface following proper treatment, or injected back into water injection wells or disposal wells. Vapor recovery is usually on all of the separation vessels and is piped back to the gas pipeline for dehydration.

### Workover Rig Operations

Workover Rigs are mobile temporary derrick stands that allow the operator to access and replace worn out ~~push-sucker rods and production tubing~~ push-sucker rods and production tubing. These rods are between 32 to 46 feet in length and are removed and ~~stored~~ staged vertically. The rods and the ~~push-sucker rods and production tubing~~ push-sucker rods and production tubing are pulled up through a casing which is ~~filled with~~ contains oil and other ~~organic~~ organic liquid. As a result of their removal, the rods and ~~push-sucker rods and production tubing~~ push-sucker rods and production tubing may be wetted with hydrocarbon liquid and have the potential to cause emissions and odor nuisances. While the amount of VOC emissions released to atmosphere is short-term, the odor potential is great, unless measures are taken to wipe excess material during removal, such as the use of a grommet.

Workover rigs are used primarily for maintenance on established production wells, and are typically powered by the internal combustion engine (ICE) used for transporting the rigs over the road to the site. These workover rigs typically use diesel fuel ICEs, with a trend to repower or purchase new rigs with diesel engines that meet CARB's new On-Road Heavy Duty Engines Tier IV standards. Workover rigs are generally smaller units with less power demands than drilling rigs. However, there are occasions where extensive maintenance work would require a supplemental electrical generator to provide additional power. These generators and the portable or temporary ICEs are a potential source of odors and particulate emissions.



### Odor and Potential Health Effects

The presence of odors does not necessarily relate to the presence or absence of toxic air contaminants, and odor issues are generally addressed as public nuisance. Odor complaints, however, are often accompanied by reports of adverse effects such as headache and nausea.

As to whether odors can cause health effects, the American Thoracic Society (ATS), a scientific society that focuses on respiratory and critical care medicine, published its official guidelines as to what constitutes an adverse health effect in 1985, and updated these guidelines in 1999. The statement is intended to “provide guidance to policy makers and others who interpret the scientific evidence for the purpose of risk management.”<sup>1</sup> The statement acknowledges that there are graduations in the degree of effects and also differentiate between an effect that is adverse from an effect that is merely a physiological response. The ATS statement indicates that air pollution exposures which interfere with the quality of life can be considered adverse. Thus odor-related annoyance should be considered adverse, even if nausea or headache or other symptoms are not present. In the ATS guidelines, odors are clearly listed as an adverse respiratory health effect.

Unpleasant odors have long been considered as warning signs of potential health risks. Such odors often elicit complaints of respiratory irritation, headache, nausea and other adverse symptoms. While the mechanism for the production of these effects is not known, these effects have been noted at concentrations of substances that produce unpleasant odors. Postulated mechanisms include neurological changes in sensory nerves that could influence symptom production in the absence of other toxicological effects.<sup>2</sup>

### Regulatory History

#### Rule 1148.1

Rule 1148.1 was adopted on March 5, 2004 to implement Control Measure FUG-05 of the 2003 AQMP by reducing VOC emissions from well cellars and wellheads at oil and gas production operations through increased inspection and maintenance, and control of produced gas emissions, with additional regulatory considerations when located within 100 meters to sensitive receptors. Rule 222 - Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II, traditionally used for simpler, low-emitting, packaged or off the shelf equipment, was concurrently amended to include well cellars and wellheads at oil and gas production facilities subject to Proposed Rule 1148.1 in the filing program, in lieu of conventional permitting.

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<sup>1</sup> “What Constitutes an Adverse Health Effect of Air Pollution?”, American Thoracic Society, 1999, <http://www.thoracic.org/statements/resources/archive/airpollution1-9.pdf>.

<sup>2</sup> “Science of Odor as a Potential Health Issue”, Schiffman, 2005.

**BACT and BARCT**

The application of Best Available Control Technology and Best Available Retrofit Control Technology (BACT and BARCT) are required and implemented on control devices for the oil and gas production equipment. The current applicable Control Techniques Guidelines established in 1983 by EPA (EPA-450/3-83-007 1983/12 Control of Volatile Organic Compound Equipment Leaks from Natural Gas/Gasoline Processing Plants) has been incorporated into Rule 1173 Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants, and is considered BACT and BARCT for oil and gas production facilities. In addition, equipment-specific standards have been developed over time as technology evolves. Table 1 below summarizes current<sup>3</sup> BACT applicable to the industry.

**Table 1.** BACT for Fugitive Emission Sources at Natural Gas Plants and Oil and Gas Production Fields and Oil and Gas Production.

<b>Subcategory/Rating/Size</b>	<b>VOC</b>
Compressors, Centrifugal Type	Seal System with a Higher Pressure Barrier Fluid (04-10-98); and Compliance with AQMD Rule 1173 (12-5-2003)
Compressors, Rotary Type	Enclosed Seal System Connected to Closed Vent System (04-10-98); and Compliance with AQMD Rule 1173
Pressure Relief Valves	Connected to Closed Vent System or Equipped with Rupture Disc if Applicable (4-10-98); and Compliance with AQMD Rule 1173 (12-5-2003)
Pumps – In Heavy Liquid Service	Single Mechanical (4-10-1998); and Compliance with AQMD Rule 1173 (12-5-2003)
Pumps – In Light Liquid Service	Sealless Type if Available and Compatible, or Double or Tandem Seals and Vented to Closed Vent System (4-10-98); and Compliance with AQMD Rule 1173 (12-5-2003)
Sampling Connections	Closed-Purge, Closed-Loop, or Closed-Vent System (4-10-98); and Compliance with AQMD Rule 1173 (12-5-2003)
Valves, Fittings, Diaphragms, Hatches, Sight-Glasses, Open-Ended Pipes and Meters in VOC Service	Compliance with AQMD Rule 1173 (12-5-2003)
<u>Combined Tankage</u>	<u>All Tanks Vented to:</u> - <u>Vacuum Gas Gathering System; or</u> - <u>Positive Pressure Gas Gathering System; or</u> - <u>Incinerator or Firebox; (1988)</u>
<u>Wellhead</u>	<u>All Wellheads Vented to :</u> - <u>Vacuum Gas Gathering System; or</u> - <u>Positive Pressure Gas Gathering System; or</u> - <u>Incinerator or Firebox; (10-20-2000)</u>

**SCAQMD Authority to Regulate Odors**

The District is given broad authority to regulate air pollution from "all sources, other than emissions from motor vehicles." Health and Safety Code (H&SC) §40000. The

<sup>3</sup> Best Available Control Technology (BACT) Guidelines for Non-Major Polluting Facilities, as defined by Rule 1302 – Definitions. <http://www.aqmd.gov/docs/default-source/bact/bact-guidelines/part-d---bact-guidelines-for-non-major-polluting-facilities.pdf?sfvrsn=4>

term "air pollutant" includes odors [H&SC §39013]. Therefore, the District may regulate to control air pollution, including odors, from PAR1148.1 sources. In addition, the District has authority to adopt such rules as may be "necessary and proper" to execute the powers and duties imposed on the District by law. [H&SC §40702]. The District's legal authority to adopt and enforce the amendment to Rule 1148.1, establishing best management practices and requirements to reduce odors from oil and gas production wells also derives from H&SC §41700, which, in pertinent part, prohibits the discharge of air contaminants causing annoyance to the public. It further prohibits the discharge of air contaminants, such as odors, which "endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property." [H&SC §41700]. The District's authority granted by H&SC 41700 to protect the public's comfort and health and safety provides for the regulation of facilities in order to prevent the discharge of odors before they cause nuisance or annoyance to the public.

In addition, H&SC §40001(b) authorizes the District to adopt rules and regulations, such as PAR1148.1, and provides, in relevant part, for the prevention and abatement of air pollution episodes which cause discomfort or health risks to a significant number of persons. PAR1148.1 is a reasonable and proper use of the District's regulatory authority.

### **Affected Industry**

Operators of oil wells and well cellars are not required to obtain SCAQMD permits for that equipment and not all oil wells utilize well cellars. Only those facilities with equipment such as API-large oil/water separators, tanks, vessels, heaters, boilers, internal combustion engines and clean-out sumps (part of the dehydration or wastewater system permit unit), and "control" equipment such as heaters, flares, gas treatment equipment, internal combustion engines, microturbines, and boilers would have SCAQMD permits. SCAQMD Rule 222 was amended on March 5, 2004 to include oil production well groups, which is defined as no more than four well pumps located at a facility subject to Rule 1148.1 – Oil and Gas Production Wells at which crude petroleum production and handling are conducted, as defined in the Standard Industrial Classification Manual as Industry No. 1311, Crude Petroleum and Natural Gas.

The number of affected facilities subject to Rule 1148.1, identified through SCAQMD permitting and filing systems, are summarized in Table 2 below:

**Table 2.** Permitted or Filed SCAQMD Oil and Gas Production Facilities, 2015

Category	Number of Facilities
Oil Wells and Gas Production - Non-RECLAIM	329
Oil and Gas Production Wells - RECLAIM	144
<b>Total</b>	<b>473</b>

## ODOR MITIGATION WORK PRACTICES AND ASSOCIATED ACTIVITIES

### Complaint Handling

SCAQMD currently manages complaints through the 1-800-CUT-SMOG hotline and through implementation of Rule 402 – Nuisance. Rule 402 prohibits any discharge of any material that may cause injury, detriment, nuisance, annoyance or discomfort to any considerable number of persons, with a large number of complaints typically associated with disagreeable odors. Currently, in order to pursue enforcement action under Rule 402, an odor must be verified at the complainant location, that same odor traced upwind to the source, and the source identified as either the boundary of a facility, or a device, equipment or unit. Once the odor is traced to either a facility or source, the complaint would become confirmed. Finally, multiple confirmed complaints called within the same timeframe would subject the source to a possible issuance of a Notice of Violation (NOV). For more frequent odor NOV's, conditions, through an Order of Abatement, may be issued to address ongoing odor issues emanating from a facility. Additionally, Rule 402 also includes provisions for damage to property.

Figure 2 outlines an overview of the typical complaint handling process, where consideration for NOV issuance is in the six or more confirmed complaint range. Where less than the NOV threshold number of complaints is established, but odors can be traced to an activity or equipment, the inspector would review applicable rules and permit conditions to determine if detected odors are attributable to potential non-compliance. Where a Rule 402 NOV is issued, the source would be subject to a more thorough and lengthy legal investigation and violation settlement.

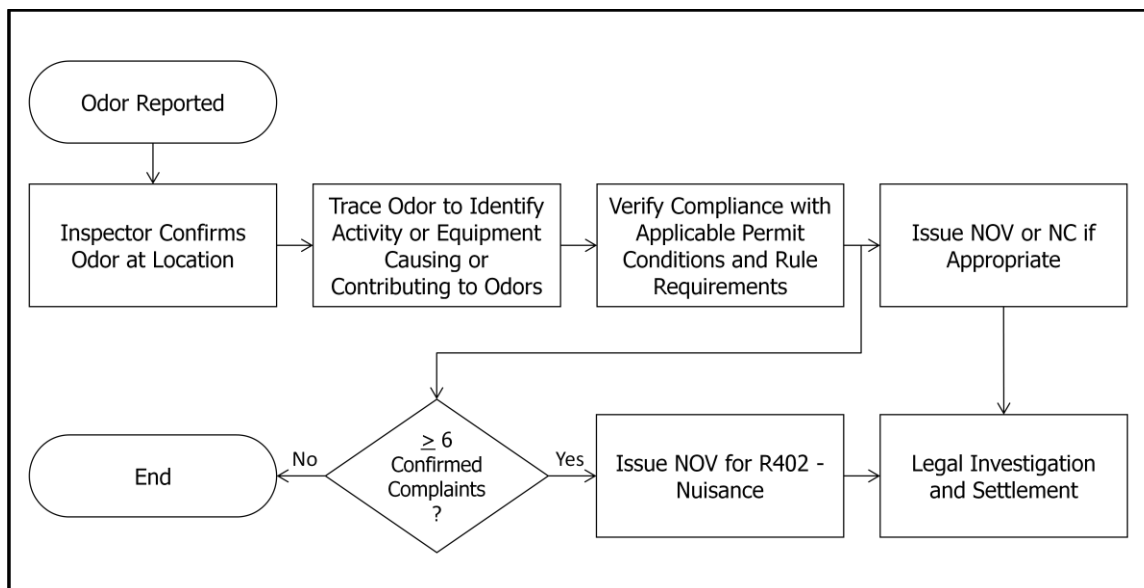


Figure 2. Typical SCAQMD Complaint Handling Process

It is not uncommon for complaints to be unconfirmed or for an odor causing event to fall short of the multiple complaint threshold for issuance of a Rule 402 NOV. Odors may be caused by infrequent or brief activities and are often short-term and fleeting. Pursuant to Rule 402, SCAQMD staff also responds to complaints involving property damage.

### Complaint Communication

Although an inspector responding to a complaint typically communicates a summary of the initial field inspection, in some cases the complainant may have chosen to be anonymous, or the complaint call may have occurred off hours or late in the evening. In other cases, especially when the complaint or facility is not confirmed, the complainant may be left with the impression that no action has been or can be taken to address their complaint. Finally, even when an NOV is issued, the subsequent legal investigation process, as indicated in Figure 2 above, may not address the immediate informational needs of a complainant, who may continue to experience exposure to objectionable odors. A facility that takes specific corrective action to address the complaint driven odor causing activity or operation may not be acknowledged should similar odors be detected from another facility or from a separate odor causing event.

### Complaint Data Analysis and Mapping

Staff reviewed complaint data associated with oil and gas production facilities, especially those that may be considered urban wells (i.e., within 1,500 feet of sensitive receptors). Table 3 below summarizes a subset of staff findings. Specifically, staff reviewed 100 out of 403 (roughly 25%) oil and gas production facilities, with only nine facilities identified as having more than one odor complaint, both confirmed and unconfirmed (alleged) over the last 5 years (2010 through 2014).

**Table 3.** Sample Complaint History, 2010 to 2014, Oil and Gas Production Facilities

Facility Name	Number of Complaints	402 NOVs	203 NOVs	1176 NOVs	1148.1 NOVs
AllenCo Energy INC	258	3	3	4	1
Angus Petroleum	106	0	0	0	0
*Freeport McMoran Oil	14	0	0	2	0
Holly Street Inc	8	0	0	0	0
**Freeport McMoran Oil	7	0	1	2	0
Amtek Construction	3	0	0	0	1
Oxy USA Inc	1	0	0	0	0
Matrix Oil Corp	1	0	0	0	0
Greka Oil & Gas Inc	1	0	2	0	0
<b>Totals:</b>	<b>399</b>	<b>3</b>	<b>6</b>	<b>8</b>	<b>2</b>

\*1371 W. Jefferson Freeport McMoran Oil

\*\* 2126 W. Adams Freeport McMoran Oil

The complainants’ locations for the above facilities are displayed in a map, showing distances of 328 feet radius and 1500 feet radius from the center of the facility, representing the existing and proposed distances to sensitive receptors, respectfully. These maps are included as part of Appendix B – Sampling of Complaint History (2010 – 2014) – Oil and Gas Production Facilities of the Draft Staff Report.

**Case Study: Allenco**

Allenco Energy, Inc. (Allenco) is an oil and gas production facility located at 814 West 23rd Street in Los Angeles, surrounded by homes and multi-family units on the west and north, and Franklin Lanterman High School and Mount Saint Mary’s College on the south and east, respectively. The facility has been in operation since the 1960’s, and the first SCAQMD permits are dated March 1970, under ARCO Oil and Gas Company. The lease was taken over by St. James Oil Company in 1987, although production was shut down on January 27, 1998 in response to economic conditions. The facility restarted operations in May 2004 as the market for crude oil increased, and on September 16, 2009, Allenco took ownership of the facility. SCAQMD inspectors noted the production rate in the 15-20 barrels per day (bpd) range during an inspection late 2009, increasing to 100 bpd as noted in an inspection early 2011, although the more recent inspections noted a generally steady production rate of 80 bpd. Figure 3 below identifies Allenco and the proximity to various sensitive receptors.



**Figure 3.** Allenco Energy, Inc. and surrounding community.

### Compliance and Complaint History

The following tables highlight the compliance history for Allenco between late 2010 and mid-2014. Over this period, the facility was cited for a total of eighteen Notices of Violation (NOV), including six for Rule 402 – Nuisance; six Notices to Comply (NC) were also issued over this time, primarily associated with inadequate adherence to administrative requirements, including recordkeeping. The facility was the subject of close to 300 complaints from the surrounding community, peaking at 192 in 2011, which also included the time in which the majority of the Rule 402 NOV's were issued. Complainants alleged Allenco operations had caused: strong odors; headaches; nausea; eye and respiratory irritations (asthma); and nose bleeds.

Table 4 summarizes the eighteen NOV's issued between 2010 and 2014.

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**Table 4.** Notices of Violation Issued, Allenco Inc. – 2010 to 2014.

<u>Date</u>	<u>NOV No.</u>	<u>Rule Number</u>	<u>Description</u>
<u>11/9/10</u>	<u>P53587</u>	<u>1148.1</u>	<u>Excess emissions observed from component in well cellar</u>
<u>01/02/11</u>	<u>P56960</u>	<u>1148.1</u>	<u>Excess emissions observed from component in well cellar</u>
<u>01/25/11</u>	<u>P53588</u>	<u>402</u>	<u>Leak in a water injection well</u>
<u>01/26/11</u>	<u>P53589</u>	<u>402</u>	<u>Lingering odors from clean-up operations due to leak in an injection well</u>
<u>01/27/11</u>	<u>P53590</u>	<u>402</u>	<u>Lingering odors from clean-up operations due to leak in an injection well</u>
<u>01/31/11</u>	<u>P51141</u>	<u>402</u>	<u>Vacuuming of by-product from a water injection tank</u>
<u>07/22/11</u>	<u>P53594</u>	<u>402</u>	<u>Old oil pipes being pulled from an idle well</u>
<u>07/27/11</u>	<u>P55619</u>	<u>1148.1</u> <u>1173</u> <u>1176</u> <u>203(b)</u>	<ul style="list-style-type: none"> <li>• <u>Excess emissions observed from component in well cellar</u></li> <li>• <u>Open ended line</u></li> <li>• <u>Cover permeable to VOCs</u></li> <li>• <u>Operating equipment in poor working conditions</u></li> </ul>
<u>08/24/11</u>	<u>P55621</u>	<u>1173</u>	<u>Open ended line</u>
<u>09/06/11</u>	<u>P55622</u>	<u>1148.1</u>	<u>Excess emissions observed from component in well cellar</u>
<u>10/24/11</u>	<u>P53597</u>	<u>203(b)</u> <u>201</u> <u>1176</u>	<ul style="list-style-type: none"> <li>• <u>Operating equipment in poor working conditions</u></li> <li>• <u>Altering equipment without prior District approval</u></li> <li>• <u>Leaving hatches open to tanks</u></li> </ul>
<u>07/28/11</u>	<u>P56971</u>	<u>1176</u>	<u>Excess emissions observed coming from sluiceway</u>
<u>02/21/12</u>	<u>P56972</u>	<u>1176</u>	<u>Cover permeable to VOCs</u>
<u>03/07/12</u>	<u>P53598</u>	<u>1148.1</u>	<u>Excess emission observed from component in well cellar</u>
<u>04/10/13</u>	<u>P50699</u>	<u>203(b)</u> <u>206</u>	<ul style="list-style-type: none"> <li>• <u>Failure to comply with Permit to Operate conditions</u></li> <li>• <u>Failure to post Permits to Operate</u></li> </ul>
<u>08/08/13</u>	<u>P61502</u>	<u>402</u>	<u>Petroleum and masking solution odors present during water injection well rework activities</u>
<u>11/12/13</u>	<u>P61503</u>	<u>1176</u>	<u>Sump vent pipe venting directly to the atmosphere</u>
<u>11/19/13</u>	<u>P61504</u>	<u>1176</u> <u>203(b)</u>	<ul style="list-style-type: none"> <li>• <u>Two opening in the wastewater sump, two (2) VOC leaks (12,000 and 8,000 ppm) measured at a hatch on a storage tank, sewer line not completely enclosed</u></li> <li>• <u>Failure to maintain roof of waste water tank in good operating condition</u></li> </ul>

Table 5 summarizes the eight NCs issued between 2010 and 2014.

**Table 5.** Notices to Comply issued, Allenco Inc. – 2010 to 2014.

<u>Date</u>	<u>NC No.</u>	<u>Compliance Requirement</u>
<u>08/20/10</u>	<u>E00890</u>	<u>Rule 203(b) - Repair vapor leak located on gas inlet line connected to gas turbine no. 1.</u>
<u>08/20/10</u>	<u>E00891</u>	<u>Rule 203(a) - Do not operate portable ICE rated greater than 50 HP without first obtaining CARB registration or AQMD permit.</u>
<u>10/25/11</u>	<u>D29396</u>	<u>H &amp; S Code 42303 - Provide proof of registration or permit for mud pump no. 6.</u>
<u>03/13/13</u>	<u>E07814</u>	<u>Rule 203(b) - Maintain wastewater system in good working condition.</u>
<u>11/19/13</u>	<u>E07544</u>	<u>Provide oil, gas, and wastewater produced during the last two years in a monthly format.</u>
<u>11/19/13</u>	<u>E075454</u>	<u>Submit detailed schematic drawings identifying all components of the wastewater system and all associated air pollution control devices.</u> <u>Provide all inspection &amp; repair records for wastewater system for the last two years.</u>
<u>02/11/14</u>	<u>E07546</u>	<u>Submit application for to secure required PCs for Oil/water/gas process and storage equipment prior to installation of such equipment.</u> <u>Submit application for VR and gas handling equipment to reflect operating process</u>
<u>04/23/14</u>	<u>E07548</u>	<u>Submit new apps. For P/O for mod. On crude oils/water water and gas</u>



### Corrective Actions and Revised Permit to Operate

Between January 2010 and September 2014, SCAQMD conducted over 150 inspections, including on-site inspections, a multi-agency inspection, and multiple community surveillances. SCAQMD conducted ambient air monitoring beginning in 2013, noting short-term elevated hydrocarbon concentrations, and conducted multiple town hall meetings.

SCAQMD prosecutors finalized settlement discussion with Allenco for fourteen NOVs issued between November 2010 through March 2012 for violation of Rules 203 – Permit to Operate, 402 – Nuisance, 1148.1 – Oil and Gas Production Wells, 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum facilities and Chemical Plants. The settlement included \$200,000 in voluntary site improvement expenses and \$61,000 penalty (credited \$46,753 for work performed at Mount Saint Mary’s College and cash paid in the amount of \$14,247).

Beginning late 2013, Allenco voluntarily ceased production and began making necessary repairs and changes to operational procedures, including pumping down and repairing affected tanks, hard piping processes, upgrading the air pollution control system and adding odor mitigation measures during well maintenance.

A revised Permit to Operate was issued to Allenco on May 6, 2015. The revised permit contains Odor Mitigation requirements, including cross-reference to all applicable SCAQMD rules, required use of a rubber grommet in conjunction with any pulling of any piping or rods, and additional recordkeeping and reporting associated with drilling, well completion, or rework, repair, or maintenance activity.

### **SUMMARY OF PROPOSED AMENDMENT**

The purpose of Proposed Amended Rule (PAR) 1148.1 – Oil and Gas Production Wells, is to provide enforceable mechanisms to reduce odor nuisance potential and to update the rule to promote clarity, consistency and enforceability.

#### **(a) Purpose**

The purpose section of PAR1148.1 includes clarifying references to emission reductions in toxic air contaminants (TAC) and total organic compounds (TOC), concurrent with the VOC emission reductions achieved through the existing rule requirements. In addition, rule language has been inserted to clarify that both operation and maintenance activities of wellheads are part of the purpose, and reference to assisting in reducing regional ozone levels and to preventing public nuisance, is added to reflect the proposed enforceable mechanisms aimed at reducing odor nuisance potential.

#### **(b) Applicability**

PAR1148.1 applies to wellheads and well cellars at onshore facilities as well as oil and gas handling operations and maintenance activities where petroleum is produced, gathered, separated, processed and stored. These facilities are also currently subject

to other rule requirements, Rule 463 – Organic Liquid Storage, Rule 1176 – VOC Emissions from Wastewater Systems which including sumps and wastewater separator, at oil and gas production wells. Production oil and gas wells are subject to Rule 1173 – Control of Volatile Organic Compounds Leaks and Releases from Component at Petroleum Facilities and Chemical Plants, and the proposed amended rule language is updated to cross-reference these rules.

**(c) Definitions**

Key definitions are proposed to be added to the definition section to support the additional enforceable mechanisms and also to promote consistency and clarify.

**New Definitions Incorporated from Other SCAQMD Rules**

Definitions have been incorporated from other rules to ensure consistency. Table 4-6 below identifies the new PAR1148.1 definitions and the respective rule that have been incorporated into the proposed amended rule:

**Table 46.** New PAR1148.1 Definitions incorporated from other SCAQMD Rules

PAR1148.1 Section	PAR1148.1 New Definition	SCAQMD Rule Incorporated From
(c)(2)	Component	<b>Rule 1173</b> - Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants
(c)(57)	Heavy Liquid	
(c)(68)	Leak	
(c)(79)	Light Liquid	
(c)(4012)	Organic Liquid	<b>Rule 463</b> - Organic Liquid Storage
(c)(4820)	Volatile Organic Compound	<b>Rule 102</b> - Definition of Terms
(c)(4921)	Wastewater	<b>Rule 1176</b> - VOC Emissions from Wastewater Systems

**New Definition to Support Investigation Requirement**

A definition for Confirmed Oil Deposition Event has been added to support the requirement to investigate the specific cause of an airborne release event that results in property damage as follows:

**(c)(5) Confirmed Oil Deposition Event** is an occurrence of property damage due to the airborne release of oil or oil mist from an oil and gas production facility, as verified by District personnel.

**New Definitions to Support Odor Mitigation Requirements**

Definitions for Confirmed Odor Event, Odor, Specific Cause Analysis and Responsible Party have been added to support the new incremental action levels associated with the proposed amendment’s additional requirements to prevent public nuisance associated with odors.

A more detailed discussion of the odor mitigation requirements follows in the requirements section of this report.

(c)(2) **Central Processing Area** is any location within an oil and gas production facility where pressurized phase separation or treatment of produced well fluids, including any produced oil, water or gas, occurs. A location that includes only oil producing wells and associated equipment not involved in pressurized phase separation or treatment, is not considered to be a central processing area.

(c)(34) **Confirmed Odor Event** is an occurrence of odor resulting in three or more complaints by different individuals from different addresses, and the source of the odor is verified by District personnel.

The number of Confirmed Odor Events is the metric used to determine the appropriate action taken by an affected facility in response to odor complaints.

(c)(4214) **Responsible Party** is a corporate officer for a corporation and a responsible party for a partnership or sole proprietorship the general partner or proprietor, respectively.

PAR1148.1 requires certification by the Responsible Party for any submitted Specific Cause Analysis reports.

(c)(4416) **Specific Cause Analysis** is a process used by an owner or operator of a facility subject to this rule to investigate the cause of a confirmed odor event or confirmed oil deposition event, identify corrective measures and prevent recurrence of a similar event.

A Specific Cause Analysis is an important step in mitigating odor or oil deposition issues and will result in requirements for the facility to generate a report summary and propose corrective actions.

Finally, a definition for **Water Injection Well** (c)(2022) has been added to PAR1148.1 to improve rule clarity and support the requirements associated with these equipment.

### Modified Definitions

The definition for Sensitive Receptor has been updated for consistency with other SCAQMD rules that also refer to sensitive receptors, including Rule 1148.2.

(c)(4315) **Sensitive Receptor** ~~is a school~~ (means any residence including private homes, condominiums, apartments, and living quarters; education resources such as preschools and kindergarten through grade twelve (k-12) schools; licensed daycare centers; and health care facilities such as hospitals, or ~~convalescent home~~ retirement and nursing homes. A sensitive receptor includes long term care hospitals, hospices, prisons, and dormitories or similar live-in housing.

Although other SCAQMD rules do not specify that daycare centers be licensed, staff agrees with stakeholder feedback that non-licensed daycare centers would be more difficult for regulated facilities to identify when establishing internal procedures for potentially affected wells, and that non-licensed daycare centers would more than

likely be housed in residences, which are already included in the proposed amended definition.

### **(d) Requirements**

PAR1148.1 adds a requirement for pumping out or removing organic liquid accumulated in the well cellar by the end of the day following three complaints in the day as verified by District personnel (d)(3).

PAR1148.1 also adds additional best practice requirements to assist in the identification and prevention of potential odor issues, as well as additional odor mitigation requirements based on exceedances of specified confirmed odor event thresholds (d)(67).

In addition to the change in the definition of a Sensitive Receptor noted above, the more stringent requirements applicable to wells located close to a sensitive receptor are proposed to become applicable when the distance is 1,500 feet or less rather than the existing distance requirement of 100 meters (328 feet).

Effective 30 days after adoption, an oil and gas production facility, under the proposed amendment, will be required to utilize a rubber grommet designed for drill or production piping to remove excess or free flowing fluid from piping that is removed during any maintenance or drill piping or rod replacement activity that involves the use the use of workover rig. (d)(4011)

Effective 180 days after adoption, ~~the~~ oil and gas production facility ~~facilities~~ with central processing areas located within 1,500 feet of a sensitive receptor, under the proposed amendment, will be required to operate and maintain a monitoring system that will alarm ~~and~~ or notify operators at a central location or control center. Oil and gas production facilities generally monitor ~~equipment for safety~~ process or fire protection purposes to comply with a broad range of federal, state or local building or fire safety regulations, and thus typically have a gas detection program. In addition, these systems can support implementation of the General Duty Clause of the Clean Air Act, Section 112(r) as part of a facility hazard assessment and accidental release prevention program, typically from a central location. ~~some~~ Some facilities utilizing utilize control centers that also allow for monitoring and controlling operating parameters to support efficiency or serve as an indicator for leak related emissions. ~~PAR1148.1 requires that such monitoring systems incorporate any emissions monitoring and associated alarm thresholds identified in any approved SCAQMD operating permit or approved odor mitigation plan. (d)(11)~~

Finally, effective 30 days after adoption, an oil and gas facility, under the proposed amendment, shall post instructions for the public related to odor complaints. The posted instructions shall be provided in a conspicuous manner and under such conditions as to make it likely to be read or seen and understood by an ordinary individual during both normal operating and non-operating hours. The instruction shall include the following minimum information in English and Spanish:

- Name of the facility;
- Facility call number; and,
- Instructions to call the South Coast Air Quality Management District complaint hotline at the toll free number 1-800-CUT-SMOG or equivalent information approved in writing by the Executive Officer. (d)(4213)

A sample layout of the instructions is included in Appendix C – PAR 1148.1 (d)(4213) – Sample Information Signage.

### **(e) Operator Inspection Requirements**

The proposed amendment continues the visual inspection requirement for stuffing boxes or produced gas handling and control equipment, but increases the distance requirement from sensitive receptors from 100 meters (328 feet) to 1,500 feet that changes the weekly inspection requirement to daily as follows:

As conducted by facilities as a general practice already, the operator shall visually inspect:

- (e)(1)(C) Any stuffing box or produced gas handling and control equipment located ~~100 meters~~ 1,500 feet or less from a sensitive receptor daily. Receptor distance shall be determined as the distance measured from the stuffing box or produced gas handling and control equipment to the property line of the nearest sensitive receptor.

The proposed amendment requires monthly TOC measurement for any component that has been identified as a potential odor source through a submitted specific cause analysis report. The specific cause analysis report, described in the next section of this staff report, is required of oil and gas production facilities following notification from SCAQMD of a confirmed odor event or confirmed oil deposition event. The additional monthly measurements are required until six consecutive months of measurement do not exceed the applicable leak rate thresholds for the subject component, after which time the underlying Rule 1173 inspection frequencies (typically quarterly) would apply. The leak rate thresholds are 100 ppmv for heavy liquid components and 500 ppmv for light liquid/gas/vapor/components. (e)(5)

### **(f) Odor Mitigation Requirements**

The proposed amendment expands upon the existing SCAQMD complaint handling process described in Figure 2 above, for facilities located within 1,500 feet of a sensitive receptor, by adding two additional action levels based on the number of Confirmed Odor Events as depicted in Table 5-7 as steps 3a and 3b.

These two proposed additional action levels are intended to provide opportunities to more readily respond to and communicate complainant concerns. As noted previously, under the existing complaint handling process, complainants may not be aware of the progress made towards odor issue resolution. An additional communication mechanism through use of the SCAQMD web page, the creation of the Confirmed Odor Event as a metric, and the proposed requirements for a Specific

Cause Analysis and Odor Mitigation Plan can both serve to demonstrate good faith efforts on the part of the regulated facility as well as close the current communication gap.

**Table 57.** Proposed Additional Complaint Action Levels for Facilities Located within 1,500 feet of a Sensitive Receptor

Increasing Requirements				
	Stage 1	Stage 2	Stage 3a	Stage 3b
Event / Action	Odor Detected	Odor Verified* and Traced to Source	Odor Cause and Corrective Actions Identified* for Confirmed Odor Event	Odor Mitigation Plan* Developed or Updated as Applicable**
By Whom	Multiple Complainants	District Personnel	Source to Conduct Specific Cause Analysis	Source to Develop and Submit Plan for District Approval

\* Communicate actions to affected stakeholders (e.g., AQMD website)  
 \*\* Required for any Notice of Violation or Multiple Confirmed Odor Events

**(f)(1)-Specific Cause Analysis**

Under the proposed amendment, for facilities located within 1,500 feet of a sensitive receptor, upon determination by an SCAQMD inspector of a Confirmed Odor Event (confirmed odor from three or more independent complainants), a Specific Cause Analysis is required. The affected facility is required to complete and submit a Specific Cause Analysis report within 30 calendar days following receipt of written notification from the Executive Officer. Similarly, a Specific Cause Analysis and report is required following receipt of written notification from the Executive Officer for any Confirmed Oil Deposition Event.

The Specific Cause Analysis includes a brief review of the activities and equipment at the facility identified as contributing or causing the odor or oil deposition in question in order to determine the contributing factors and ultimately the corrective actions associated with the event. In addition, any applicable SCAQMD rule or permit condition shall be identified and reviewed for compliance with the requirements. Furthermore, the Specific Cause Analysis should assess proper implementation of internal procedures or preventative maintenance schedules, and if the procedures should be updated to address any performance gaps or adequate training of operators. The scope of the Specific Cause Analysis is limited to the possible origins and causes of the Confirmed Odor Event or Confirmed Oil Deposition Event, and is a more formal version of the current practice by SCAQMD inspectors when odors or oil deposition are traced back to a specific source.

**(f)(2)(g) Odor Mitigation Plan**

Under the proposed amendment, for facilities located within 1,500 feet of a sensitive receptor, upon determination by an SCAQMD inspector of the occurrence of three or more Confirmed Odor Events within a six month period, or the issuance of a single odor related NOV under Rule 402 – Nuisance, an Odor Mitigation Plan will be required. The affected facility is required to complete and submit an Odor Mitigation Plan (OMP) within 90 calendar days following receipt of written notification from the Executive Officer. In addition, for any facility with an existing approved OMP, an update to the plan is required under the proposed amendment following the occurrence of an additional three or more Confirmed Odor Events over a subsequent six month period following the last plan approval, or following the issuance of an odor related NOV under Rule 402 – Nuisance subsequent following the last plan approval. (g)(1)

**(f)(2)(B)(g)(2) Odor Mitigation Plan Elements**

An approved OMP must identify all the activities and equipment that may contribute or may have contributed to a confirmed odor event, and the internal procedures and requirements used to manage them. As such, the proposed amendment requires that Odor Mitigation Plans identify oil and gas production and wastewater generation equipment and activities, including both normal and spill or release management control operations, with corresponding identification of potential or actual sources of emissions, odors, frequency of operator inspection and history of leaks. Also the plan is required to identify activity involving drilling, well completion or rework, repair, or maintenance of a well, which notes the sources of emissions and odors, odor mitigation measures, processes for responding to odors and odor complaints, and procedures used for odor or emissions monitoring at the site and fence line. The facility will also be required to identify emission points and emission or leak monitoring used for all wastewater tanks, holding, knockout, and oil/water separation vessels, including any pressure relief devices or vacuum devices attached to the vessels, with provisions for recording of releases from such devices. Finally, any equipment or activity identified as part of any previously submitted Specific Cause Analysis report will also be required.

**(f)(2)(C)-(g)(3) Odor Monitoring and Mitigation Requirements**

Because an OMP serves as the collection of best practices applicable to the affected facility, the proposed amendment identifies a list of odor monitoring and mitigation requirements to include within the plan. Table ~~6-8~~ contains a list of these requirements.

Table 6-8. Proposed Odor Monitoring and Mitigation Requirements

PAR1148.1 Odor Monitoring and Mitigation Requirement	Description
Odor Surveillance	<p>Continual odor surveillance downwind at the perimeter of the property at all times during drilling, well completion, or rework, repair, or maintenance of any well, including water injection wells, recorded hourly.</p> <p>Equivalent odor monitoring equipment may be used in lieu of odor surveillance, subject to approval.</p> <p>If odors are detected from odor surveillance or odor monitoring at the perimeter of the facility, <del>all and confirmed from drilling, well completion, or rework, repair, or maintenance, the associated</del> drilling, well completion, or rework, repair, or maintenance of any well will discontinue until the source or cause of odors are determined and mitigated in accordance with measures previously approved.</p>
Well Piping, Tubing and Rod Management	<p>Any removed drill piping or production tubing and drill <del>any removed sucker</del> rods shall be managed through written procedures that ensures that potential odor producing emissions are minimized through means such as <del>use of a tarp or similar covering or by storing within an enclosed area, or equivalent.</del></p>
Tighter Leak Detection and Repair (LDAR)	<p>Reduce the required repair times for components subject to Rule 1173 LDAR to the lowest schedule of one calendar day with an extended repair period of three calendar days (rather than the seven day repair time allowance and seven day extended repair period).</p>
Facility Specific Best Practice	<p>Any corrective action identified in a Specific Cause Analysis report previously submitted by the facility.</p>
<u>Improved Monitoring</u>	<p><u>Review Specific Cause Analysis report and identify improvements to existing monitoring systems required pursuant to paragraph (d)(12) or parameters for a new monitoring system installation. Establish a schedule for any identified improvements or installations subject to Executive Officer approval.</u></p>
Feasibility Assessment	<p>For any odor mitigation or monitoring requirement identified above determined by the facility to not represent an appropriate best practice for inclusion in the OMP, an evaluation and documentation that states the reason why such provision is not feasible to include, subject to approval by the Executive Officer, must be included in the OMP.</p>

The SCAQMD recognizes that all requirements listed in Table 6-8 may not apply to all facilities or be related to the source of any confirmed odor events or associated notices of violation, and therefore the odor mitigation plan should indicate why the listed requirement is either not applicable or feasible in the OMP.

The owner and operator of an oil and gas production facility shall comply with all provisions of an approved OMP. Violation of any of the terms of the plan is a violation of this rule.



### **(gh) Recordkeeping Requirements**

Facility operators are required to maintain records of inspections, repair activities, and the conditions that would require them to pump out their well cellars. Records of data collected must be maintained for a period of three years and a minimum of five years for all Title V facilities. The proposed amendment requires that all records and other applicable documents required as part of an Odor Mitigation Plan also be maintained at the facility or facility headquarters for a period of three years or a period of five years for a Title V facility and that such records and applicable documents be made available to the Executive Officer upon request.

### **(hj) Test Methods**

PAR1148.1 includes additional test methods incorporated from Rule 1173 associated with implementation of similar leak detection and repair requirements, and includes test methods for:

- VOC content by ASTM Method D 1945 for gases, SCAQMD Method 304-91 for liquids; percent VOC of a liquid evaporated at 150° C (302° F) shall be determined according to ASTM Method D86. (hj)(3)
- Flash point of heavy liquids by ASTM Method D93. (hj)(4)

### **(ij) Exemptions**

Rule 1148.1 currently provides an exemption for certain activities that may be in conflict with a written company safety manual or policy (ij)(2). PAR1148.1 updates this exemption by clarifying that oil and gas production facilities must demonstrate that the written company safety manual or policy complies with applicable industry safety standards, in order to provide additional information to determine whether an activity from which the exemption is claimed would have posed a safety concern. (ij)(2)

Finally, PAR1148.1 includes amended language to improve readability and update rule section numbering.

## **EMISSION INVENTORY**

Staff does not expect any quantifiable emission reductions or increases because the proposed amendment does not change any VOC standards, and is primarily intended to provide enforceable mechanisms to reduce nuisance odor potential and is otherwise administrative in nature.

## **COST ANALYSIS AND SOCIOECONOMIC IMPACTS**

### **Introduction**

PAR 1148.1 reflects best practices that have been widely implemented in the industry. To ensure continual implementation of these practices, PAR 1148.1 includes additional requirements as part of developed and approved OMP odor

mitigation measures. These measures are contingent upon three confirmed odor events at an Oil and Gas Production facility within a six month period or if an Oil and Gas production facility receives a Notice of Violation for a Rule 402 Nuisance violation. If either of these conditions exists, the measures in the first ~~four~~ three rows of Table 7-9 (shaded rows) could be required either in its entirety, individually, or in a combination depending on site-specific circumstances, and the specific cause of the confirmed odor event or notice of violation that triggered the OMP requirement.

Based on a five year review of historical complaint data, it is expected that potentially a maximum of three facilities would have fallen into this category. The average facility affected would have six affected wells and on average these wells would be maintained or reworked twice each year, with each related activity occurring over 10 to 12 hours per day.

The following represents a conservative cost estimate for the implementation of the odor mitigation measures. In some cases, based on the development through a review of the specific cause analysis or notice of violation investigation, the measures noted below may not be applicable to the affected facility and would not be included as part of a final approved OMP.

**Table 79.** PAR 11481.1 Potential ~~OMP~~ Improvement Categories.

<u>Enclosure or Equivalent</u>
<del>Tarping or Covering</del>
Surveillance/Repair/Maintenance
<u>Monitoring Systems – OMP</u>
<u>Additional LDAR</u>
<u>Immediate Well Cellar Vacuum Truck</u>
<u>Monitoring Systems</u>
Rubber Grommet

**Odor Mitigation Plan Improvement Measures**

Enclosure or ~~Tarping~~Equivalent

During repair and maintenance periods, the lift rods are replaced in oil and gas wells. The lift rods are removed and ~~stored~~ staged vertically, and since this is an elevated activity (greater than 40 ft. in height), it can result in hydrocarbon vapors that travel offsite if there is sufficient wind. An enclosure structure, used in some oil and gas facilities, could curtail odor complaints by minimizing exposure to cross-winds within these structures. Staff has determined that affected facilities would use an existing structure rather than construct an enclosure around a reworked derrick, especially when there are other options for minimizing expose to cross winds and odors ~~such as plastic tarps~~. Lift connector rods are removed vertically and stored horizontally and could also be ~~covered with plastic tarps or similar coverings~~ stored

within an enclosure or equivalent to limit cross-wind exposure and resultant potential odors. The cost of an enclosure structure is estimated to be \$20,000 to \$50,000. The annualized cost of enclosure for three potentially affected facilities is estimated at between \$15,837 and \$18,450.

~~It also is assumed that each potentially affected facility would use up to six tarps, twice a year for six wells. The cost of each tarp is estimated at \$14.00. The annual cost of this requirement for three affected facilities over five year period is estimated at \$600.~~

The proposed amendment allows for an equivalent method for minimizing potential nuisance causing emissions from this maintenance activity and facilities would be responsible for proposing and demonstrating effectiveness as part of the OMP submittal process. Staff expects any proposed equivalent methods to require less capital than the estimated costs for an enclosure structure. Affected facilities could use a wind screen to limit cross wind exposure and potential odors as an example of an equivalent option lower in cost to use of a fixed enclosure. Based on discussions with vendors, the cost of renting a free-standing 200 linear foot by 8 foot high wind screen is estimated at \$1,200 for six months<sup>4,5</sup>. The annual cost of using wind screens in this configuration for three potentially affected facilities would be estimated at \$7,200, although staff expects that lower cost options could be available for shorter timeframes or configurations, and based on Odor Mitigation Plan approval.

### Surveillance During Repairs and Maintenance

The surveillance of the perimeter of an oil and gas production facility during specific repair and maintenance activities can require one or more personnel to traverse the perimeter of a facility during operations and this activity would incur a moderate increase in labor cost. If surveillance personnel detect odors related to the specific repair or maintenance activity, the facility is required to cease operation until the source of the odor is determined and mitigated after which operation is resumed. Based on the May 4, 2014 BLS, Occupational Employment Statistics<sup>6</sup>, the labor cost for surveillance is estimated to be \$25-\$30 per hour. Based on discussion with industry, each affected facility would expect to use 20 hours of surveillance for each of the six affected wells per year. The annual cost of surveillance for the three potentially affected facilities over a five-year period is estimated to be \$1,980.

### **Other Odor Mitigation Measures**

Additional Leak Detection and Repair (LDAR) inspection would be required when a submitted Specific Cause Analysis report identifies a leaking component as the cause of a Confirmed Odor Event. This requirement would include two additional inspections per quarter (3 monthly inspections each quarter). The cost of each

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<sup>4</sup> <http://www.rentnational.com/fence-windscreen-rentals.aspx>

<sup>5</sup> [http://www.fencescreen.com/?gclid=CjwKEAjwqmsBRDGy\\_3h\\_eS80jYSJACS95CvIDSkghtYBOoPVR5GTWjIHJgX9cOSniI-gEbvVShb1RoCHPbw\\_wcB](http://www.fencescreen.com/?gclid=CjwKEAjwqmsBRDGy_3h_eS80jYSJACS95CvIDSkghtYBOoPVR5GTWjIHJgX9cOSniI-gEbvVShb1RoCHPbw_wcB)

<sup>6</sup> [http://www.bls.gov/oes/current/oes\\_ca.htm#47-0000](http://www.bls.gov/oes/current/oes_ca.htm#47-0000)

inspection and reports preparation is excepted to be \$60.00 per hour. The inspection requires a two-person team on a eight hour shift, most oil field components can be inspection in this period of time. The annual cost for this requirement is \$1,152, or less if six consecutive monthly inspections indicate no leaks.

Where the source of the odor is confirmed to be from an oil well cellar the proposed amendment requires immediate (no later than the end of the day) removal of the oil from the cellar. A vacuum truck would be employed for the removal, potentially in addition to the vacuum truck typically employed to remove at the end of the job, which may add an additional day's cost. The average cost for renting a DOT vacuum truck is \$1,100 per day and the annual cost for the additional pump out is expected to be \$3,300. The administrative cost associated with compliance with this section of the rule is expected to be minimal.

### Monitoring Systems and Rubber Grommets

The ~~other~~ final two measures are required for all facilities. The ~~f~~Facilities with central processing areas located within 1,500 feet of a sensitive receptor are required to operate and maintain a centrally located monitoring/alarm system. In addition, ~~Rubber~~ rubber grommets must be applied to the ~~lift connector~~ drill piping, production tubing and sucker rods squeeze excess hydrocarbon liquid from them ~~rods~~ and prevent vapors from becoming air-borne.

Most ~~F~~facilities with central processing areas currently have basic monitoring system in place to ~~address~~ evaluate process or fire safety and to implement the General Duty Clause of the Clean Air Act, Section 112(r) as part of a facility hazard assessment and accidental release prevention program. ~~many~~ Some facilities also have more sophisticated systems for process monitoring up to remote process control. Although based on conversations with many urban based facility operators indicate that the proposed monitoring requirements for facilities with central processing areas located within 1,500 feet are reflected by currently existing systems, staff is including a cost estimate for 5% of the total facility population, to account for any facilities that may not have been accounted for. The cost of a centralized monitoring system is estimated to be \$8,000 to \$12,000. The annualized cost of centralized monitoring systems for 24 potentially affected facilities (approximately five percent) is estimated at between \$30,408 and \$35,424.

The estimated cost to provide additional support for electronic monitoring of additional parameters for any facility that becomes subject to an OMP that would also be required to integrate additional process monitoring would include the additional cost for software, hardware and installation. Software cost can range between \$2,000 to \$20,000, utilizing either existing facility hardware in the form of a dedicated CPU, keyboard and interface, or an additional dedicated CPU at an additional cost of \$1,000, or a rough average per facility cost of \$12,000. Alternatively, facilities subject to additional monitoring under an OMP may supplement existing systems through use of VOC monitoring stations. A gas sensor based system (see examples from Appendix A – Monitoring Systems for the Oil and Gas Production Industry), consisting of four detectors routed to a controller is estimated at roughly \$2,500 to

## Final Staff Report

\$2,600 per monitoring point. Using an estimated per facility cost of \$12,000 per facility, the annualized cost of additional monitoring that may be required for the three facilities estimated to be subject to OMP over a five-year period is between \$3,800 and \$4,430.

Under PAR 1148.1, all the identified ~~470-473~~ affected facilities would be required to install rubber grommets to minimize the amount of excess hydrocarbons during rod removal activities. The cost of each rubber grommet is estimated at \$10.<sup>7</sup> It is assumed that each affected facility would operate, on average, six wells and would need to replace each rubber grommet twice per year. The annual cost of this requirement is estimated to be ~~\$56,400~~\$56,760.

Table ~~8-10~~ presents the potential annual cost of PAR 1148.1 by the ~~OMP~~ improvement categories. The total projected annual cost of PAR 1148.1 is estimated to be ~~\$78,377~~\$113,238 to ~~\$81,620~~\$121,494. The one time capital cost of enclosures and monitoring systems are annualized over ten years with between one to four percent real interest rate.

**Table ~~8-10~~.** Potential Cost of PAR 1148.1 by ~~OMP~~ Improvement Categories.

<b>OMP-Improvements</b>	<b>Estimated Unit Cost Per Facility</b>	<b>Total Cost per year for Three Affected Facilities</b>	<b>Total Annual Cost</b>
Enclosure <u>or Equivalent</u>	\$50,000	\$150,000	** \$15,837 to \$18,450
Surveillance/Repair/Maintenance	\$3,300	\$9,900	*\$1,980
Monitoring Systems – <u>OMP</u>	\$12,000	\$36,000	** \$3,800 to \$4,430
<u>Additional LDAR</u>	<u>\$1,920</u>	<u>\$5,760</u>	<u>*\$1,152</u>
<u>Immediate Well Cellar Vacuum Truck</u>	<u>\$1,100</u>	<u>\$3,300</u>	<u>\$3,300</u>
<u>Monitoring Systems</u>	<u>\$12,000</u>	<u>\$288,000 for 24 Facilities</u>	** <u>\$30,408 to \$35,424</u>
Rubber Grommet	\$120	All Facilities	<del>\$56,400</del> <u>\$56,760</u>
<b>Total Annual Cost</b>			<b><del>\$82,469</del> <u>\$113,238</u> to <del>\$85,712</del> <u>121,494</u></b>

\*The estimated costs will incur every five years, as such annual cost is one-fifth the total estimated costs

\*\*One-time cost is annualized over ten years with between 1% to 4% real interest rate

<sup>7</sup> <http://www.delcity.net/store/Rubber-Grommets/>

It has been a standard socioeconomic practice that, when the annual compliance cost is less than one million current U.S. dollars, the Regional Economic Impact Model (REMI) is not used to simulate jobs and macroeconomic impacts. This is because the impact would most likely be diminutive and would fall within the noise of the model. REMI results constitute a major component of the SCAQMD's socioeconomic analysis. Therefore, when annual compliance cost is less than one million dollars and REMI is not used, the socioeconomic report could be brief and included in the staff report, unless otherwise determined on a case-by-case basis.

### INCREMENTAL COST EFFECTIVENESS

Under Health and Safety Code § 40920.6, the SCAQMD is required to perform an incremental cost analysis when adopting a Best Available Retrofit Control Technology (BARCT) rule or feasible measures required by the California Clean Air Act. To perform this analysis, the SCAQMD must (1) identify one or more control options achieving the emission reduction objectives for the proposed rule, (2) determine the cost effectiveness for each option, and (3) calculate the incremental cost effectiveness for each option. To determine incremental costs, the SCAQMD must “calculate the difference in the dollar costs divided by the difference in the emission reduction potentials between each progressively more stringent potential control option as compared to the next less expensive control option.” Staff reviewed the current standards throughout the state and determined that PAR1148.1 represents BARCT for the operation of oil and gas production wells because there are no other more stringent limits available. ~~Although implementation of PAR1148.1 is anticipated to reduce the potential for nuisance odors, it is not anticipated to result in emission reductions.~~ However, because the proposed requirements are primarily event-driven based on odors and are non-routine in nature, emission reductions that are permanent and quantifiable cannot be estimated, and therefore no an incremental cost analysis is not required under Health and Safety Code § 40920.6.

### COMPARATIVE ANALYSIS

Health and Safety Code Section 40727.2 requires a comparative analysis of the proposed rules and all existing federal air pollution control requirements, as well as existing or proposed SCAQMD rules and regulations that apply to the same equipment or source type. There are no federal air pollution control requirements that apply to wells or well cellars. There are currently three SCAQMD rules that regulate the emissions of fugitive VOCs at Oil and Gas Production facilities, one rule that exempts most oil production equipment from permit requirements and one rule that requires filing for oil production equipment that is exempt from permit. In addition, one SCAQMD rule requires notification and reporting for well drilling, well completion, and well reworks activity, and SCAQMD also has a rule to address odors that contribute to public nuisance. Staff has determined that PAR1148.1 does not conflict with the following rules because any similar requirements have been directly incorporated or cross-referenced into the rule language.

**Rule 1148 – Thermally Enhanced Oil Recovery Wells**

Rule 1148 applies to Thermally Enhanced Oil Recovery Wells and limits VOC emissions to 4.5 pounds per day or less per steam driven well.

**Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers**

Rule 1148.2 establishes requirements for owners or operators of onshore oil and gas wells within SCAQMD’s jurisdiction to notify the Executive Officer when conducting well drilling, well completion, and well reworking activities that involve production stimulation activities such as hydraulic fracturing, gravel packing and/or acidizing, and also requires emissions and chemical reporting. Rule 1148.2 does not apply to continuous operations at oil and gas well production activities.

**Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants**

Rule 1173 – Fugitive Emissions of Volatile Organic Compounds applies to oil and gas production fields, natural gas processing plants and pipeline transfer stations and includes requirements aimed at reducing VOC leaks from components such as valves, fittings, pumps, compressors, pressure relief devices, diaphragms, hatches, sight glasses and meters.

**Rule 1176 – VOC Emissions from Wastewater Systems**

Rule 1176 applies to wastewater systems and associated control equipment located at petroleum refineries, onshore oil production fields, off-shore oil production platforms, chemical plants and industrial facilities. Sumps and wastewater separators are required to be covered with either a floating cover equipped with seals or a fixed cover, equipped with a closed vent system vented to an Air Pollution Control system.

Currently, under Rule 1176 (i)(5)(H), well cellars used in emergencies at oil production fields are exempt if clean-up procedures are implemented within 24 hours after each emergency occurrence and completed within ten (10) calendar days.

**Rule 219 – Equipment Not Requiring a Written Permit Pursuant to Regulation II**

All wellheads, except for those with steam injection are exempt from written permit requirement per Rule 219 (n)(1) – Natural Gas and Crude Oil Production Equipment.

**Rule 222 – Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II**

Rule 222 requires filing for Oil Production Well Groups, defined by the rule as no more than four well pumps located at a facility subject to Rule 1148.1 – Oil and Gas Production Wells at which crude petroleum production and handling are conducted, as defined in the Standard Industrial Classification Manual as Industry No. 1311, Crude Petroleum and Natural Gas.

### **Rule 402 – Nuisance**

Rule 402 prohibits the discharge of any material that causes injury, annoyance nuisance or damage to property to a considerable number of people. Over the years the development of urban areas placing sensitive receptors closer to established oil field production sites have resulted in an increase in the number of complaints.

### **CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)**

Pursuant to California Environmental Quality Act (CEQA) Guidelines §15252 and §15162 and SCAQMD Rule 110, the SCAQMD has prepared an Environmental Assessment (EA) for Proposed Amended Rule 1148.1. The environmental analysis in the Draft EA concluded that Proposed Amended Rule 1148.1 would not generate any significant adverse environmental impacts. The Draft EA was released for a 30-day public review and comment period from April 29, 2015 to May 28, 2015. Subsequent to release of the Draft EA, modifications were made to the proposed project and some of the revisions were made in response to verbal and written comments on the project's effects. SCAQMD staff has reviewed the modifications to the proposed project and concluded that none of the modifications constitute significant new information or a substantial increase in the severity of an environmental impact, nor provide new information of substantial importance relative to the draft document. In addition, revisions to the proposed project in response to verbal or written comments would not create new, avoidable significant effects. As a result, these revisions do not require recirculation of the document pursuant to CEQA Guidelines §15073.5 and §15088.5. Therefore, the Draft EA is now a Final EA and is included as an attachment to this Governing Board package. Prior to making a decision on the proposed amendments to Rule 1148.1, the SCAQMD Governing Board must review and certify the Final EA as providing adequate information on the potential adverse environmental impacts of the proposed project.

### **FINDINGS UNDER CALIFORNIA HEALTH AND SAFETY CODE SECTION 40727**

Health and Safety Code Section 40727 requires that prior to adopting, amending or repealing rules, the SCAQMD Governing Board shall make findings of necessity, authority, clarity, consistency, non-duplication and reference, based on relevant information presented at the hearing. The findings are as follows:

**Necessity:** The SCAQMD Governing Board has determined that a need exists to adopt Proposed Amended Rule 1148.1 to clarify requirements and provide additional enforceable mechanisms to prevent public nuisance from emissions of volatile organic compounds, toxic air contaminants and total organic compounds.

**Authority:** The SCAQMD Governing Board obtains its authority to adopt, amend or repeal rules and regulations from California Health and Safety Code Sections 39002, 40000, 40001, 40702, 40725 through 40728, 41508, and 41700.



**Clarity:** The SCAQMD Governing Board has determined that Proposed Rule 1148.1, as proposed to be amended, is written or displayed so that its meaning can be easily understood by the persons directly affected by it.

**Consistency:** The SCAQMD Governing Board has determined that Proposed Rule 1148.1, as proposed to be amended, is in harmony with and not in conflict with or contradictory to, existing statutes, court decisions or state or federal regulations.

**Non Duplication:** The SCAQMD Governing Board has determined that Proposed Rule 1148.1, as proposed to be amended, does not impose the same requirements as any existing state or federal regulations, and the amendments are necessary and proper to execute the powers and duties granted to, and imposed upon, the SCAQMD.

**Reference:** The SCAQMD Governing Board by adopting this regulation is implementing, interpreting or making specific the provisions of: Health and Safety Code Sections 40001 (rules to achieve ambient air quality standards), 40440 (b) (Best Available Retrofit Control Technology), and (c) (rules which are also cost-effective and efficient), 40702 (rules to execute duties required by law) and 41700 (public nuisance).

## COMMENTS AND RESPONSES

### Public Comments

A public workshop was held on April 16, 2015 in which approximately 22 people attended. Participants provided comments at the meeting and staff received one written comment. The following section summarizes the comments received as a result of the public workshop, as well as staff's responses.

### Written Comment

The following comment letter was received from the Western States Petroleum Association, dated April 24, 2015. The letter has been bracketed for cross-referencing with corresponding responses following each page.

Comment Letter #1



Western States Petroleum Association  
Credible Solutions • Responsive Service • Since 1907

**Sandra Burkhart**  
Senior Coastal Coordinator

April 24, 2015

Barry Wallerstein, D.Env.  
Executive Officer  
South Coast Air Quality Management District  
21865 E. Copley Drive  
Diamond Bar, CA 91765

Subject: Draft Amended Rule 1148.1 – Oil and Gas Production Wells

Dear Dr. Wallerstein:

Western States Petroleum Association (WSPA) appreciates the opportunity to submit comments on the draft amendments to Rule 1148.1 – Oil and Gas Production Wells. WSPA is a non-profit trade association representing companies that explore for, produce, refine, transport and market petroleum, petroleum products, natural gas and other energy supplies in California and four other western states.

Rule 1148.1 - Oil and Gas Production Wells, was adopted by your Governing Board more than 10 years ago and has had a long history of successful compliance by our industry. In addition to that rule, SCAQMD has numerous other rules that affect this industry as well as dozens of regulations by other environmental regulatory agencies. We take our commitment to providing clean, reliable energy to the residents of California as well as our commitment to the environment and the communities we serve very seriously.

Overall Comments

During the April 14, 2015, working group meeting for this rule amendment, District staff and management indicated that they have not tallied the number of confirmed complaint calls to the agency (if any) about our member companies. As such, it is unclear how it was determined that this amendment is necessary at this time without any data to support it.

1-1

In the absence of any odor data, the SCAQMD seeks to regulate potential odor emissions from oil and gas production wells. This amendment is unnecessary and does not result in any quantified emission reductions. Every industry and facility has the potential to emit odors, yet these amendments target only our industry.

Further, numerous other District, state and federal regulations already exist, the goals of which are to reduce accidental emission releases from oil and gas operations that may lead to odors. The SCAQMD already regulates odors under Rule 402 – Nuisance, so it is unclear as to why another regulation is necessary.

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### Response to Comment #1-1

Complaint data has been incorporated into the draft staff report as Appendix B – Sampling of Complaint History (2010 – 2014) – Oil and Gas Production Facilities and shows that some of the oil and gas production facilities have received numerous odor complaints.

SCAQMD Rule 410 – Odors from Transfer Stations and Material Recovery Facilities currently establishes odor management practices and requirements to reduce odors from municipal solid waste transfer stations and material recovery facilities. In addition, Proposed Rule 415 – Odors from Rendering Facilities seeks to establish odor mitigation requirements applicable to Rendering Facilities, and is scheduled for adoption later this year. The proposed amendment to Rule 1148.1 is a continuation of the effort to further minimize the potential for public nuisance due to odors from specific industries. While there are various regulations that address accidental releases or breakdowns, it is not certain that potential nuisance can be solely attributed to upset conditions, or to other non-upset conditions from routine or preventative maintenance activities, or to otherwise compliant but inefficient operational or maintenance practices.

The provisions of the proposed amendment seek to strengthen the preventative measures some facilities may currently be taking and formalizing them in order to improve communication and transparency between the regulated community and their local residential community. As such, staff believes that only facilities with ongoing odor nuisance issues will become subject to the more stringent requirements of the proposed amendment, whereas the community will benefit overall from the increased level of assurance provided from improved communication and improved overall awareness of the operations and practices conducted by the majority within the industry.

Lastly, some VOC and Toxic Air Contaminates (TACs) may be reduced as a result of incorporating additional best practices to reduce odors, but quantification of these benefits is difficult for State Implementation Plan submittals.

Comment Letter #1 (Cont.)

Mr. Barry Wallerstein  
April 21, 2015  
Page 2

1-1  
Cont.

This rule not only attempts to solve an odor nuisance problem that does not exist, it has no actual emission reductions.

We were relieved to hear at the April 17th Stationary Source Committee (SSC) meeting that District staff has reversed its prior decision and will now prepare a Socioeconomic Impact Assessment. Page 20 of the staff report states that, "The proposed amendments are administrative in nature and do not have any socioeconomic impacts." Certainly, we do not believe this statement to be accurate and are happy to hear that the cost associated with this amendment will be evaluated.

WSPA assumes that this analysis will include the numerous, very costly new requirements outlined in the proposed amendments, in addition to the new standards for workover rigs that are not even technologically feasible at this time.

The rule requires every company (regardless of whether a single complaint call is levied against them) to install and maintain a "monitoring system that will alarm and notify operators at a central location...and will incorporate any emissions...identified in any approved SCAQMD operating permit." How could installation of such a complex, custom-designed computerized monitoring system be absent any expense? Further, where is the evidence to suggest that such monitoring is necessary when there is no data to support the assumption that this industry presents an odor problem?

1-2

The ban on the use of diesel-fired workover rigs is also the cause of great concern and potentially significant cost. It is WSPA's understanding that non-diesel fired workover rigs do not exist. What would be the cost to custom retrofit a rig with a natural gas engine, as required in section (c)(iii)? Further, WSPA questions the authority of the SCAQMD to regulate mobile sources of equipment that appear to fall under the jurisdiction of the California Air Resources Board. If SCAQMD knows of natural gas-fired workover rigs, these manufacturers' specifications and associated cost should be included in the Staff Report.

Significant additional labor costs would also result from the required change from weekly to daily inspections of all stuffing boxes and produced gas handling equipment within 1,500 feet of a sensitive receptor (rather than the currently required 323 feet). WSPA requests clarification as to the rationale behind the 1,500 foot buffer area and share what other regulations have similar setbacks. This setback is extreme, arbitrary and absent precedent, particularly when imposed upon an industry with no documented history of odor nuisance.

The rule's requirement that operators of oil and gas production wells conduct continuous odor surveillance downwind at the perimeter of each property would be both labor intensive and extremely costly. The existing Rule 1148.1 has recordkeeping and data requirements that industry has satisfied since 2004. Clearly a cost-benefit analysis would find these proposed requirements unsupported. Based on SCAQMD staff's own assessment, this rule has a negative cost benefit analysis. Further, odor is subjective, with no known monitoring device or measuring stick, so it is unclear what type of surveillance would be successful. This rule amendment results in no benefit at a great cost.

1-3

The staff report does not identify a single facility of the 473 in the Basin for whom odor nuisances have been a problem.

1-4

In addition to the required Socioeconomic Impact Assessment, staff indicated at the SSC meeting that an Environmental Assessment is currently being prepared pursuant to the California Environmental Quality Act (CEQA). While we appreciate the rulemaking being moved from April 2015 to June 2015, we are still unsure how the SCAQMD can complete these reports and meet the state's noticing requirements by the May 1, 2015, Set Hearing Board Package date.

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### **Response to Comment #1-2**

A socioeconomic analysis has been included in the draft staff report, which includes a discussion of centrally located monitoring systems for facilities located within 1,500 feet of a sensitive receptor, and for odor surveillance. Staff notes, as a result of comments received and additional assessment, the use of alternative fueled or electric-powered workover rigs has been removed from the Odor Mitigation Plan requirements in the proposed rule.

It is important to note that staff does not believe that the requirements associated with implementation of an Odor Mitigation Plan and of the proposed amendment will have a significant cost impact to the larger regulated community and that only facilities with ongoing odor nuisance issues will become directly affected. Moreover, the requirements identified in the Odor Mitigation Plan section of the proposed amendment would be applicable to areas within the facility that are identified as potential sources of nuisance odor, or to areas that have become identified as part of a Specific Cause Analysis.

Staff does not expect the daily visual inspection to add significant additional labor costs, considering industry has indicated that it is standard practice to visit each well as part of their daily routines and because the visual inspection is not a labor intensive exercise. Where follow-up repair or maintenance is required following a failed visual inspection, it would be expected that the same frequency of follow-up should occur under the current weekly inspection, unless such equipment fails on a more than weekly frequency, which industry has indicated is not the case.

See also Response to Comment # 1-1.

### **Response to Comment #1-3**

Staff has included a summary of the complaint history data in the Staff Report, as well as a map of the facilities with more than one complaint in Appendix B – Sampling of Complaint History (2010 – 2014) – Oil and Gas Production Facilities.

### **Response to Comment #1-4**

The Draft Environmental Assessment and Notice of Completion were released April 28, 2015 for public review.

Comment Letter #1 (Cont.)

Mr. Barry Wallerstein  
April 21, 2015  
Page 3

1-4  
Cont.

These analyses will help convey to the public the fact that there are no emission reductions associated with implementation of this amended rule. Further, "being able to smell something" does not necessarily correlate with adverse health effects. In fact, numerous studies and the SCAQMD's own ambient monitoring data proves this fact.

1-5

In addition to Rule 1148.1, there are numerous other SCAQMD regulations currently in place which require emission reductions, leak detection and repair, emission control systems and other measures designed to eliminate potential odor impacts from oil and gas operations. They include, but are not limited to:

- ✓ Rule 222 – Filing Requirements for Specific Emission Sources Not Requiring Written Permits Pursuant to Regulation II;
- ✓ Rule 401 – Visible Emissions;
- ✓ Rule 403 – Fugitive Dust;
- ✓ Rule 430 – Breakdown Provisions;
- ✓ Rule 462 – Organic Liquid Loading;
- ✓ Rule 463 – Organic Liquid Storage;
- ✓ Rule 464 – Wastewater Separators;
- ✓ Rule 466.1 – Valves and Flanges;
- ✓ Rule 467 – Pressure Relief Devices;
- ✓ Rule 301 – Fees (Annual Emission Inventory Report);
- ✓ Rule 2004 – Breakdown Provisions for RECLAIM Facilities;
- ✓ Rule 1470 – Internal Combustion Engines, RECLAIM;
- ✓ Rule 1176 – VOC Emissions from Wastewater Systems;
- ✓ Rule 1148 – Thermally Enhanced Oil Recovery Wells;
- ✓ Rule 1149 – Storage Tank Degassing;
- ✓ Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants;
- ✓ Rule 1166 – VOC Emissions from Decontamination of Soil;
- ✓ Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities; and
- ✓ Rule 402 – Nuisance.

1-6

Rule 402 – Nuisance, already allows SCAQMD inspectors to issue Notices of Violations (NOVs) after six complaint calls. Monetary penalties must be paid for odor complaints and companies must rectify the situation that caused any odors.

1-7

District Rule 430 – Breakdown Provisions, requires a company to notify the SCAQMD within one hour of discovery that any device is not operating properly and may have resulted in emission leaks. Written documentation must then be submitted which identifies what was broken, how it was fixed and the quantification of any emission leaks. These reports are also used to issue NOVs.

1-8

In addition to air quality regulations, several other environmental agencies regulate oil and gas operations with the goal of maintaining equipment integrity, safety and preventing any negative environmental impacts. Monitoring above and beyond what is already required by the Fire Departments, Consolidated Unified Program Agencies (CUPAs), Occupational Safety and Health Administration (OSHA), and California Department of Gas and Geothermal Resources (DOGGR) are redundant and unnecessary. The SCAQMD should allow those agencies with direct jurisdiction over this industry to continue to monitor and regulate this industry.

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### **Response to Comment #1-5**

Staff agrees and has updated the rule language to indicate that the cross-referenced rules in the Applicability subdivision include the language “includes, but is not limited to:” to address the intent of your comment, considering the variability in the facility operations and other existing rules that may regulate those operations.

### **Response to Comment #1-6**

The current complaint handling process under Rule 402 – Nuisance addresses violations under the approximate six independent verified complainants for a given odor event. The proposed amendment seeks to provide additional enforceable mechanisms to prevent potential nuisance issues from becoming a public nuisance, and to provide additional means to communicate intermediate actions prior to the issuance of a notice of violation and the resultant mitigation in the form of penalties or fees. As such, staff believes the proposed amendment not only provides additional assurances to the local community that intermediate actions are being taken to prevent larger nuisance odor from forming, but also provides a mechanism for the regulated community to share their corrective and preventative measures and best practices without the overhang of enforcement action.

### **Response to Comment #1-7**

As noted, Rule 430 – Breakdown Provisions does not provide relief from Rule 402 – Nuisance. However, not all odor issues are related to breakdown, and the purpose of the proposed amendment is to prevent nuisance, not to respond to nuisance causing conditions.

See also Response to Comment #1-1.

### **Response to Comment #1-8**

Staff agrees that oil and gas production facilities currently operate existing systems to safeguard for fire prevention and emergency response, and considers these systems as centrally located monitoring systems, meeting the requirements of paragraph (d)(12) of PAR1148.1. The requirement for a centrally located monitoring system has been revised to apply only for central processing areas of an oil and gas production facility located within 1,500 feet of a sensitive receptor, in order to monitor and ensure proper facility operation. PAR1148.1 seeks to leverage these systems for those facilities that may become subject to an odor mitigation plan to integrate any identified feasible additional odor or surrogate emissions monitoring equipment as part of the odor mitigation plan implementation.

The proposed amendment does not change the definition of Nuisance. Rather, the proposed amendment creates intermediate enforcement mechanisms short of a notice of violation, and serves the purpose of potentially preventing notices of violation for Nuisance, provided the Specific Cause Analysis is representative and encompasses adequate corrective actions that provide for continual improvement in the facility’s overall odor management system and implementation of best practices.

Comment Letter #1 (Cont.)

Mr. Barry Wallerstein  
April 21, 2015  
Page 4

1-8  
Cont.

Therefore, these proposed amendments are redundant with current environmental regulations and, as such, unnecessary and excessive. This rule's proposed language would change the definition of Nuisance from six calls per day to requiring a written Specific Cause Analysis Plan after just three odor complaints in any six month period.

1-9

This unfairly singles out a specific industry which does not have a history of legitimate odor complaints. In fact, the SCAQMD's ambient monitoring, conducted for many years at oil and gas fence line locations, confirms no excess emissions. Many of our member companies have never been issued an odor NOV.

1-10

Based on our members' experience and recent testimony at the rule making public meeting held in Montebello on March 26, 2015, community activists have indicated that they utilize "phone trees" and that calls are placed to SCAQMD by people who did not actually smell an odor. Asking industry to complete additional reports on the basis of only three calls will be onerous and, again, will not advance the cause of clean air nor will it reduce criteria pollutants in the South Coast Air Basin in any way.

Further, WSPA members are extremely concerned about the lack of transparency as to how current odor complaints are handled. The SCAQMD's recent refusal to indicate street addresses and/or people's names leads us to conclude that SCAQMD knows in many cases it is the same one or two people calling repeatedly from the same location. A true odor nuisance should result in calls from various nearby addresses. The fact that complaint calls continued to come in to SCAQMD about Allenco long after they voluntarily ceased operations indicates the specious nature of these calls.

There is no scientific basis for this rulemaking and there is ample SCAQMD evidence demonstrating that odor complaints from the oil and gas industry are no greater than those calls received for other industries. SCAQMD's own ambient monitoring data in and around oil and gas production facilities for the past several years indicates emission levels significantly below background levels elsewhere in the South Coast Air Basin. In fact, emissions actually increased (i.e., four minute "spikes") AFTER Allenco suspended operations, according to Mr. Mohsen Nazemi at the Stationary Source Committee Meeting in September, 2014.

1-11

SCAQMD staff indicates that 1080 wells were drilled or "reworked" in the past 18 months in the South Coast Air Basin. Our repeated requests for confirmation that no odor complaints have been associated with these well drilling operations have gone unanswered by District staff.

1-12

Odor monitoring is subjective, burdensome and does nothing to reduce criteria pollutants or toxic air contaminant emissions.

Specific Areas of Concern

1-13

- The Applicability Section (b) notes three of the many air quality regulations required of the industry. As mentioned above, there are numerous District regulations absent from this list.

1-14

- Per (c)(3), any three calls now constitutes a "Confirmed Odor Event." The definition does not provide the time lapse of the three complaints, nor does it specify whether they can be from within the same apartment or housing complex.

1-15

- The rule would require SCAQMD to respond to each and every specific call made by the public in order to document a three-call Confirmed Odor Event. This seems impossible, given limited SCAQMD resources.

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### **Response to Comment #1-9**

For those member companies that have never been issued an odor NOV, or that rarely if ever receives a confirmed complaint, the requirements of the proposed amendment will have minimal impact. However, staff disagrees that previous monitoring work at oil and gas production facilities has failed to confirm excess emissions. For example, data collected as part of the AllenCo investigation routinely showed a spike in emissions, albeit for short periods of time, which has led to multiple nuisance violations.

See also Response to Comment #1-1.

### **Response to Comment #1-10**

The current complaint handling process used by the SCAQMD involves the confirmation by an agency inspector of any odor identified in a complaint. The confirmation includes identification of the odor at the complainant location, traced back to a source. Any use of call trees that do not result in confirmation by the agency inspector would not qualify under definition as a confirmed odor event.

It should be noted that the agency has responsibility for not only reduction in criteria pollutants leading to attainment of the ambient air quality standards, but also is responsible for preventing public nuisance under the Health and Safety Code. Odor issues affecting a single complainant may be better described as a private nuisance and would not be covered by this authorization. The criteria used to establish a public nuisance is a relatively high bar, although the crossover from a potential private to a potential public nuisance is nuanced, and the proposed amendment seeks to improve awareness over the issues involved, the efforts by the regulated industry, and the concerns from the local community.

Finally, although not every complaint call results in a confirmed odor event, the complaint itself can be a community outreach opportunity, either as an indicator of dissatisfaction with perceived responses, actions, or of the desire for more information and awareness of the activities, including frequency and timeframes. In this way, management of potential private nuisance issues can help avoid escalation into a possible public nuisance situation.

See also Response to Comment # 1-9

### **Response to Comment #1-11**

Drilling and rework activities are covered by Rule 1148.2 — Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers rather than Rule 1148.1.

See also Response to Comment #1-3.

### **Response to Comment #1-12**

Odor monitoring is used as part of an odor management system. It is not directly related to criteria or toxic air contaminant emissions, although there may be cross-over. Nuisance is inherently subjective and odor monitoring should be expected to be similar.

### **Response to Comment #1-13**

See Response to Comment #1-5.

### **Response to Comment #1-14**

The definition for Confirmed Odor Event refers to “an occurrence of odor resulting in three or more complaints by different individuals from different addresses, and the source of the odor is verified by District personnel.” Individuals from different addresses but within the same housing complex would be considered different individuals provided they reside in different addresses. The time lapse of the complaints would be relative to the time required to verify them, and to the extent that the odor resulted from the same occurrence, as determined through investigation by the inspector.

### **Response to Comment #1-15**

The District’s goal is to respond to all complaints during normal working hours, and prioritizes complaints during off-hours based on frequency and complaint history. Although it is staff’s intention to respond to all complaints, some limitations exist that may prevent immediate response. However, the proposed amendment does not require a response to each and every call, only that any confirmation of an odor that results in three or more independent complaints would qualify as a confirmed odor event and the subsequent requirements that are triggered by that designation. Staff will reassess the effectiveness of this approach on a periodic basis and may determine the need for a confirmed odor event resulting from more or less complaints.

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- 1-16 • After three complaint calls from anyone over a six month period, a written Specific Cause Analysis is required. If the source of the odor event was confirmed by AQMD personnel, why would the facility need to “investigate the cause of confirmed odor event...”? The cause would have already been determined in order to be confirmed by the SCAQMD. Further, the company would already (as mentioned above) be subject to extensive reporting requirements under Rule 430 – Breakdown Provisions. A Specific Cause Analysis does not lessen the likelihood of an odor incident. Much of this information is already required to be submitted in a 430 Breakdown report.
- 1-17 • If the definition of Nuisance is to change, then Rule 402 should be amended so that all industries are treated equally. Typically, 6 calls in one day constitutes a Notice of Violation (NOV) under existing Rule 402 – Nuisance.
- 1-18 • The rule requires every oil and gas company to put signs on exterior fencing, with specific instructions spelling out how to complain to SCAQMD about production facilities and their operators. What other industries are required to do this? Why is this industry being singled out? Why is SCAQMD encouraging calls toward one industry?
- 1-19 • Section (d)(11) requires each company to install a Continuous Monitoring System and alarm system regardless of whether or not a single complaint call comes in.
- 1-20 The system must “incorporate any emissions or process monitoring and associated alarm thresholds...”  
What type of monitoring is required and what pollutants/levels are to be monitored? Daily and weekly monitoring and data gathering are already required by several other agencies and SCAQMD rules. What are the allowable emission thresholds to which this data should be compared? Who will establish these thresholds?
- 1-21 • The rule further requires an Odor Mitigation Plan after nine complaint calls. This is in addition to the Specific Cause Analysis. Is such a plan required of any other industry?
- 1-22 • Continual odor surveillance downwind at the perimeter of the property at all times during well work is required. Observations shall be recorded hourly. If an odor is detected, all drilling work must cease. What specific compounds are to be analyzed? Is the human nose the barometer? If so, odor is again subjective, so it is unclear how one individual would make this determination
- 1-23 • Further, the Odor Mitigation Plan requirement itself can now result in a Notice of Violation. What constitutes such a violation?
- 1-24 • If an Odor Mitigation Plan is required, the facility is then banned from using diesel fired workover rigs. To our knowledge, neither electric nor natural gas workover rigs currently exist. Further, these rigs are already regulated as mobile sources by the California Air Resources Board (CARB). WSPA questions the SCAQMD’s legal authority to regulate this equipment and is unclear how this rule change will reduce potential odor emissions.
- 1-25 • This rule arbitrarily changes the set back to sensitive receptors from 323 feet to 1,500 feet. Upon what scientific data or analysis is this change based? This is inconsistent with other SCAQMD regulations which specify permit notification and siting requirements based on shorter distances. Specifically, this proposed change contradicts Rule 1401 Guidance, 1401.1 – Requirements for New and Relocated Facilities Near Schools, Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion

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### **Response to Comment #1-16**

Because not all confirmed odor events are expected to be the result of a breakdown, a facility may not be required to perform an investigation per Rule 430. To the extent that there is overlap, a report under one rule could serve as a report under the other, provided the affected facility indicates that the submitted report is intended to serve multiple purposes.

In addition, confirmation of an odor is not confirmation of the specific cause. Whereas an odor is confirmed and traced to a source from the location of the complainant to a facility boundary, while ruling out other potential sources through consideration of upwind and downwind conditions, a specific cause analysis can point towards a process upset, improper implementation of best practices, or identification of a previously unidentified odor causing condition. A properly conducted Specific Cause Analysis and proper incorporation of corrective actions into a facility's overall management system helps prevent future occurrences, and is a universally accepted quality assurance practice.

### **Response to Comment #1-17**

The proposed amendment to Rule 1148.1 does not change the definition of a public nuisance of the implementation of Rule 402 – Nuisance. However, as staff continues to address and analyze the extent of complaints pertaining to specific industries, staff may consider a similar approach for those industries in the future.

See also Response to Comment #1-6.

### **Response to Comment #1-18**

Rule 461 currently contains signage requirements for complaint reporting through 1-800-CUT-SMOG. Rule 410 – Odors from Transfer Stations and Material Recovery Facilities also contains a signage requirement for complaints and Rule 1420.1 – Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities are also required to post contact information related to complaints. Proposed Rule 415 contains a similar requirement to PAR 1148.1.

The requirement for posting signage for complaints is in response to community requests for such information and facilitates communication, awareness, and most importantly, faster mitigation of the underlying issues. SCAQMD encourages complainants to call in a complaint when nuisance type issues occur, independent of the suspected or confirmed source.

### **Response to Comment #1-19**

The requirement for operation and maintenance of a centrally located monitoring system, which has been revised to apply only to facilities with central processing areas located within 1,500 feet of a sensitive receptor, recognizes the prevalence of

existing systems used for purposes other than odor or emissions monitoring that can be used as surrogate monitoring.

See also Response to Comment #1-8.

### **Response to Comment #1-20**

Paragraph (d)(11) requires that any monitoring requirements that are identified as part of an odor mitigation plan be integrated with a centrally located monitoring system. The odor mitigation plan is triggered through multiple confirmed odor events or a notice of violation for Rule 402 – Nuisance, and any activities or equipment that is identified from the specific cause analyses or notice of violation investigation would be reviewed by the facility owner or operator and submitted for review by the SCAQMD to determine if any appropriate and feasible additional monitoring, either emissions or surrogate parameter monitoring is warranted to minimize or respond to nuisance odor causing events.

See also Response to Comment #1-8.

### **Response to Comment #1-21**

The Odor Mitigation Plan requirement is triggered following three confirmed odor events over any six month period, rather than nine complaint calls over an indeterminate period of time or agency confirmation status. Facilities under Rule 410 – Odors from Transfer Stations and Material Recovery Facilities are subject to an Odor Management Plan, which is required of all facilities rather than through use of a confirmed odor event trigger.

Proposed Rule 415 – Odors from Rendering Facilities also contains an Odor Mitigation Plan requirement, based on confirmed odor event trigger.

See also Response to Comment #1-1.

### **Response to Comment #1-22**

The proposed rule language has been revised to more directly link any odor detected as part of the surveillance requirement of (f)(2)(~~C~~)I(ii) to the activities being monitored, including the addition of the following phrase associated with discontinuation of activities:

“...unless the source or cause of the detected odors are determined to not be associated with the activity under surveillance.”

### **Response to Comment #1-23**

Similar to the provisions of Rule 221 – Plans, subdivision (e), a violation of any requirement stated within an approved Odor Mitigation Plan would constitute a violation of the proposed amended rule.

### **Response to Comment #1-24**

Due to stakeholder comments and additional staff analysis, the proposed requirement for use of alternative-fuel or electric-powered workover rigs has been removed from the Odor Mitigation Plan requirements in the proposed rule.

### **Response to Comment #1-25**

The increased proximity distance to sensitive receptors under the proposed amendment would harmonize the requirement with Rule 1148.2 - Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers.

Complaint history pertaining to a subset of the oil and gas production facilities indicates that the majority of complaints are from locations farther than 100 meters, and also include some locations beyond 1,500 feet. Because nuisance is primarily determined by the receptor, and the incident rate for this source category has been driven by residents due to proximity concerns, staff believes that increasing the sensitive receptor distance as proposed is an appropriate proxy for addressing nuisance potential and nuisance mitigation.

A summary of the complaint information and distances is included as See Appendix B – Sampling of Complaint History (2010 – 2014) – Oil and Gas Production Facilities.

Finally, with respect to Rules 1401, 1401.1, 1470, and 212, the identified setback requirements were not established for the purposes of minimizing public nuisance and the corresponding criteria is not the same as for PAR1148.1.

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1-25  
Cont.

and Other Compression Ignition Engines, and 212 – Standards for Approving Permits and Issuing Public Notices, etc. These are regulations pertaining to known air toxics yet they are assigned a smaller set back than potential odor? Each of these rules would also require amendments.

1-26

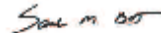
As the staff report correctly states, Health and Safety Code Section 40727 requires the Governing Board to adopt rules for which the findings of necessity, authority, clarity, consistency, non-duplication and reference can be made. These proposed amendments meet none of these criteria.

1-27

In conclusion, the rule is unnecessary and duplicative of numerous other SCAQMD and state requirements aimed at reducing emissions and potential odors from oil and gas operations. SCAQMD has no legal authority over workover rigs which are already regulated as mobile sources by CARB. Finally, several definitions and the newly established 1,500' setback for sensitive receptors are not consistent with other SCAQMD rules. It is unclear why a rule with no emission reductions and which does nothing to protect public health is necessary at this time.

We urge the SCAQMD to return its focus to the federally-mandated mission of attaining and maintaining ambient air quality standards. These are health-based protective standards. The Rule 1148.1 amendments don't reduce emissions, but they do create a larger, most burdensome set of requirements, one which do not get this Basin one step closer to attainment. WSPA and its member companies appreciate the opportunity to provide comments and look forward to working with the District on this rulemaking.

Sincerely,



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CC: Naveen Berry  
Philip Fine, Ph.D.  
Governing Board members

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### **Response to Comment #1-26**

The draft staff report identifies the draft findings of necessity, authority, clarity, consistency, non-duplication and reference.

### **Response to Comment #1-27**

See responses to Comments #1-1, #1-2, #1-14, #1-17, #1-24, #1-25, #1-26.



### Oral Comments

The following comments were received at the April 16, 2015 public workshop:

#### Comment #1

More definitions are needed, including for “odor” and various forms of processed gas. Definitions should be included from DOGGR regulations and for internal consistency; the PAR refers to “oil”, “crude oil” and “emulsified oil”.

#### Response

Staff has reviewed the proposed amendment and has incorporated a definition of “odor” consistent with the definition included in the currently Proposed Rule 415 – Odors from Rendering Facilities as part of the introduction of the odor mitigation concept. However, staff believes that the current references to oil, crude oil and emulsified oil rely on common terminology and that defining these terms may have an inadvertent limiting effect on compliance determination and action. Similarly, expanding the set of definitions to include the various forms of processed gas and harmonizing current Rule 1148.1 definitions with DOGGR regulations could have a similar limiting effect and thus are not recommended for revision.

Finally, Rule 1148.1 currently applies to oil and gas production wells and the amendment covers oil and gas production facilities, which includes oil and produced gas handling equipment. Natural gas distribution, transmission and associated storage operations are not subject to the current or proposed amended rule.

#### Comment #2

The proposed amendment should be evaluated as a “good neighbor policy”, with consideration for a lower action level threshold for facilities that are in even closer proximity to sensitive receptors that can be located within 20 to 30 feet from the property line. Facilities within 500 feet of a sensitive receptor should have additional requirements. SCAQMD Proposed Rule 415 Odor from Rendering Facilities has more stringent standards and should be adopted under PAR1148.1.

#### Response

The odor mitigation requirements of PAR1148.1 parallels the structure in Proposed Rule 415 by including odor mitigation requirements such as notification signage for all facilities while also setting additional odor mitigation action levels based on the number of confirmed odor events. Rule 1148.1 currently requires additional inspection and repair actions for wells located within 100 meters of a sensitive receptor while the proposed amendment extends the proximity requirement to 1,500 feet (457 meters), which is more stringent. Furthermore, the proposed amendment harmonizes the sensitive receptor definition from existing Rule 1148.2 – Notification Reporting Requirements for Oil and Gas Wells and

Chemical Suppliers to include residences, which provides additional protections for communities over the current rule, which excludes residences. To the extent that facilities located even closer to sensitive receptors represent a higher nuisance potential, the greater potential should readily translate into more rapid triggering of the odor mitigation action levels. Staff's review of the complaint history [included in Appendix B – Sampling of Complaint History (2010 – 2014) – Oil and Gas Production Facilities] suggests that only a handful of facilities have the potential to trigger the odor mitigation requirements under the proposed amendment and decreasing the proximity requirement would not increase the number of potentially affected facilities.

### **Comment #3**

Affected communities are put in a position where they feel they are trading their health in exchange for philanthropy from operating facilities, because community outreach from facilities tends to reduce complainants but may not reduce exposures to potential nuisance odors or associated health impacts. Facility workers themselves may feel that they are choosing between employment and good health.

### **Response**

Oil and gas production facilities are currently subjected to several SCAQMD rules and regulations, including the various rules identified in comparative analysis section, which cover both criteria pollutant and toxic air contaminant emissions and application of Best Available Control Technology and Best Available Retrofit Control Technology, as well as the protective standards under Regulation I-V - Regulation XI-V - Toxics and Other Non-Criteria Pollutants.

The requirements under Rule 402 – Nuisance serves as both a final regulatory prohibition to protect the public from otherwise *de minimis* emissions that may result in objectionable odors as well as a mechanism for further protecting the public from event driven releases that may be caused by poor implementation of facility emission management programs, including preventative maintenance or possible non-compliance that is not identified as part of the underlying facility monitoring or agency inspection efforts.

Staff's review of the compliance history of these facilities indicates a general high level of compliance – however, staff also believes that the proximity to sensitive receptors does represent a higher nuisance potential. The proposed amendment seeks to acknowledge the higher potential for odor nuisance by adding additional enforcement mechanisms to lower the threshold for potential regulatory action following confirmation of an odor driven event. Similarly, the proposed amendment seeks to acknowledge the general high level of compliance within the industry by setting action levels so that only facilities with recurring odor driven issues are required to implement more rigorous mitigation measures to further protect sensitive receptors from potential exposures and reducing exposures to even lower levels, based on a site-specific evaluation and use of current best practices.

### **Comment #4**

Under the current complaint handling system, inspectors do not visit complainants—I've made several complaints and have never seen an inspector.

### **Response**

The current complaint handling system covers initial inspector response, investigation, and follow-up communications. Following the initial complaint, inspectors, once dispatched, attempt to identify and trace the odor based on the complainant description and knowledge of the area, including nearby operations and activities. Should the odor be identified as part of a general area investigation, the inspector may need to immediately spend time tracing the odor before it dissipates in order to properly identify any potential sources. In addition, during off-hours, evenings and weekends, supervising inspectors prioritize the complaint response based on historical activity and complaint description. In many cases the inspector may be resource constrained and unable to contact the complainant in person, but will instead contact via phone to describe the complaint response, and when available, the resolution of the complaint.

The proposed amendment seeks to provide additional communication mechanisms to keep the complainant and affected local community informed of the status of facilities, with respect to confirmed odor complaints and associated activities in response to any corrective actions. Furthermore, the proposed rule requires posting of signage at the facility that provides contact information for the facility and the SCAQMD complaint process information.

### **Comment #5**

Idled wells should not be exempted under Rule 1148.1.

### **Response**

The current rule provides an exemption for low producing wells that are not located within 100 meters of a sensitive receptor, based on the lower emissions potential. Staff expects the associated odor nuisance potential to be similarly low. Because staff in general believes the odor mitigation plan would be required under the proposal only for those facilities with recurring odor issues and because these issues have not been identified as part of the complaint history for low production wells, the exemption should continue under the proposed amendment.

### **Comment #6**

An oil field modernization project being publically heard in Montebello this month (April 2015) features the relocation of wells towards the periphery of the property, putting them in closer proximity to sensitive receptors.

### Response

SCAQMD has reviewed the Draft Environmental Impact Report (EIR) and Recirculated Draft EIR for the Montebello Hills Specific Plan project and provided the following comment letters to the Lead Agency:

<http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2008/january/montebello-hills-specific-plan.pdf>

<http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2009/june/proposed-montebello-hills-specific-plan.pdf>

<http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2014/october/deirmontebello.pdf>

PAR1148.1 would further strengthen the protections for the community from oil and gas wells.

### Comment #7

Under Rule 1148.2, exemptions are available for “emergencies”. What constitutes an emergency and when do we find out details?

### Response

Rule 1148.2 (d)(3) allows for delayed notification for activities that are necessary to avert a threat to life, health, property or natural resources. Notifications are required no later than 48 hours after the start of operations and the community would then have access to the information through the web portal, similar to other required notifications under Rule 1148.1.

### Comment #8

Can the District provide a sample of what the required signage in the proposed amendment might look like?

### Response

Staff has added an example of the required signage as Appendix C – PAR1148.1 (d)(12) Sample Information Signage to the Draft Staff Report.

### **Additional Comments**

The following include additional comments that were received as part of the rule development process:

#### **Comment #9**

Including Toxic Air Contaminants is not appropriate to the purpose and scope of the proposed amendment. The applicability should be only to hydrogen sulfide and the purpose section further clarified to refer to nuisance odorous compounds.

#### **Response**

Although the primary purpose of PAR1148.1 is to reduce VOC emissions from oil and gas production wells, because concurrent reductions of TAC and TOC emissions result from the administrative and engineering controls, and because the rule also includes maintenance activities, it is appropriate to reference all pollutants that are subject to the rule. Furthermore, because any potential odors from the emissions from oil and gas production wells are from the above listed pollutant categories, further including and subsequently defining “nuisance odorous compounds” could have a limiting effect from an enforceability perspective and is not recommended by staff.

#### **Comment #10**

The proposed amendment should include cross-referencing to definitions that originated from other SCAQMD rules in order to ensure consistency. Verbatim inclusion in the proposed amendment may cause difficulty should the underlying rule from which the definition was derived become amended at a later date.

#### **Response**

PAR 1148.1 includes direct cross-referencing for definitions that have universal applicability, such as the definition for VOC. For other areas, the affected community has requested SCAQMD to include definition language directly in the proposed amendment for clarity especially for individuals that may not have direct access to the internet or the other cross-referenced regulatory language. While it may be difficult to ensure consistency amongst the various SCAQMD rules with respect to common definitions, the independence of the definitions may provide additional flexibility in the development of future source specific requirements. In fact, updating of definitions in the underlying rule may be for a purpose that is more unique to that industrial sector and could potentially create enforceability or compliance related issues to PAR 1148.1 if they were directly cross-referenced or linked in the manner suggested. Staff has reviewed the definitions that were derived from other SCAQMD rules, cross-referencing where appropriate and including full language definitions for clarity elsewhere.

### Comment #11

Delete “toxic air contaminants (TAC) emissions” from the Purpose and replace with “Hydrogen Sulfide”.

The rule and all of the requirements of the rule are for the control of gaseous organic compounds (TOC) and most volatile compounds of carbon (VOC). These two classifications of gaseous hydrocarbon compounds include the key TAC components found in hydrocarbons (such as Benzene). Almost all of TAC compounds identified by the California Air Resources Board and listed in Section 7412 of Title 42 of the United States Code would not be applicable to oil and gas production wells. Therefore, inclusion of the TAC list is unnecessary and unwarranted as part of this rule.

One of the concerns with inclusion of TACs is diesel particulate matter and other combustion TAC emissions, which are not a compound associated with oil and gas wells, but are associated with mobile equipment that services oil and gas wells. Is it AQMD’s intent for the scope of the rule to include diesel electric generators and engines and vehicular traffic even though they are already subject to regulation under CARB? A huge and most likely infeasible burden will be placed on industry and the inspectors to attempt to find the appropriate source of a combustion odor complaint since all LA Basin fields are surrounded by highly traveled busy streets and roads, which far exceed emission levels of temporary and transient oil field sources. It is also important to note the methane and ethane are exempt compounds in AQMD’s Rule 102. They are both odorless and have no bearing on the alleged and unjustified odor complaint management being proposed by the Rule amendments.

### Response

Although the primary purpose of the rule is to reduce VOC emissions from oil and gas production wells, because concurrent reductions of TAC and TOC emissions result from the administrative and engineering controls, and because the rule also includes maintenance activities, it is appropriate to reference all pollutants that are subject to the rule.

See also Response to Comment #1-24 and Comment 9.

### Comment #12

Several definitions have been added to PAR1148.1 that are repeats of definitions in other District rules. Examples include “component”, “heavy liquid”, “leak”, “light liquid” (Rule 1173), and “wastewater” (Rule 1176). In addition to the concern CIPA expressed in its letter of February 13, 2015, regarding the creation of “internally inconsistent language within existing AQMD rules” when one rule overlaps or exceeds the requirements of another rule (e.g., fugitive component repair times in PAR1148.1 vs. Rule 1173), CIPA believes the practice of repeating definitions of the same terms in multiple rules is unwise unless absolutely necessary to tailor the rule to specific circumstances. District staff has acknowledged it is generally not possible to

update multiple rules at the same time in order to ensure consistency. Thus, if a definition were to change in one rule as part of a future rule amendment, but not change in the other rule(s), the result would be inconsistent definitions between rules. This creates confusion not only for the regulated community, but also for the public and District staff as well. This confusion leads to inefficient conversations and increases the potential for misunderstandings and inadvertent non-compliance. A better practice would be to utilize Rule 102 and other rules that provide standard definitions to be referenced in the District's rules and regulations. In addition to the repeat definitions from Rules 1173 and 1176 noted above, PAR1148.1 now includes a definition of "facility" that is slightly different from the definition in Rule 1302. Again, CIPA believes this is unwise and encourages the District to define such common and far-reaching terms in broadly applicable rules that can then, in turn, be referenced in individual source specific rules.

### **Response**

Definitions that have originated from other rules are proposed for incorporation into the proposed amendment in response to general stakeholder comments received that requested that cross-referencing be minimized to facilitate understanding of the requirements for individuals who may not have access to the cross-referenced rules. In addition, cross-referencing definitions may limit flexibility during subsequent rule development efforts for either rule.

See also Response to Comment 10.

### **Comment #13**

Insert language "except where there is an existing AQMD permit for air pollution control equipment" at the end of the first sentence to the provisions for use of a produced gas collection and control system in paragraph (d)(7).

This will allow existing or future AQMD permit conditions to supercede the rule to avoid conflict. Some site specific or various location permits of CIPA member companies require the use of a PID for VOC measurements on portable tanks equipped with permitted vapor control devices (i.e. carbon canisters). However, this Rule provides for using a TVA for TOC measurements. If the language does not change, there will be a conflict to either comply with the Rule or the permit condition.

### **Response**

The current language requires a control efficiency demonstration of 95% or measurement of less than 250 ppmv. Permit conditions may require a different measurement, but would be required to demonstrate compliance with Rule 1148.1. However, for clarity, the proposed amended language has been revised to include the following provision "...or by an equivalent demonstration identified in an approved permit issued on or after March 5, 2004, pursuant to Rule 203 – Permit to Operate."

### **Comment #14**

Remove the changes to “1,500 feet” and maintain the existing rule language of “100 meters”.

With the focus of the changes on the urban environment, the existing 100 meter requirement (328') and the change to sensitive receptor definition include and regulate all urban well cellars. There is no scientific evidence to support the increase to 1,500', which appears arbitrarily established. There are unintentional consequences of expanding to 1,500 feet. Large numbers of additional wells in large multi-acre fields would become incorporated into the rule, for which there is absolutely no basis.

Pointing to Rule 1148.2's setback requirement as justification to change this rule is not an appropriate justification. CIPA pointed out in earlier comments that setback requirements in 1148.2 were inconsistent with 1148.1. CIPA objected to and repeatedly questioned the District's scientific reason for the distance requirements in the rule without ever receiving any justification. In addition, 1148.2 is a reporting rule which is far different than a compliance rule which will likely add significant costs without any benefit.

The existing Rule 1148.1 has recordkeeping and data requirements that industry has satisfied since 2004 and can show there are no emissions from well cellars. The data clearly does not support the proposed amendments. To the contrary, a CIPA member company has actual air monitoring data collected over the past 4 years which has recorded no TOCs from drilling, completions and workover activities. During the same time, there have been no confirmed odor complaints at this company's facility in 4 years!

### **Response**

See Response to Comment #1-25.

### **Comment #15**

Concerning odors, monitoring data collected by industry and LA County (February 2015 Air Quality Study conducted at the Inglewood Oil Field) clearly indicate there is no odor issue related to oil and gas production activities. Therefore there is no justification for expending significant sums of money to create a central facility or location that currently does not exist at many facilities. While in theory it sounds like a monitoring system is appropriate, actual monitoring data proves otherwise. There are multitudes of emission thresholds, most of which are not related to odor. It is costly with no meaningful, documented value. This requirement is not feasible and a financial impact study needs to be conducted. Enforcement of existing AQMD rules and regulations is far more effective to ensure “bad actors” comply

Also, concerning safety, existing safety systems are already installed at production facilities. Redundant monitoring required by these rule amendments add no value and are duplicative and unnecessary. Safety systems that are inspected by Fire



Departments include, but are not limited to, LEL monitors; fire eyes (aka flame detection monitoring); and fire pumps and fire systems. In addition, DOGGR conducts environmental inspections, which include environmental, spill and fire equipment inspections. LA Fire Health Hazardous Materials Division conducts environmental inspections to include safety and environmental concerns as well as proper storage of hazardous materials.

### Response

See Response to Comment #1-8.

### Comment #16

The Operator Inspection Requirements are too stringent. The frequencies should be changed by making all daily and weekly requirements quarterly, consistent with the frequency required for well cellar inspections. In addition, the proximity to sensitive receptor condition should remain at 100 meters rather than 1,500 feet.

The existing Rule 1148.1 has recordkeeping and data requirements that industry has satisfied since 2004. The data clearly does not support the proposed amendments.

Additionally, a CIPA member company has actual air monitoring data collected over the past 4 years which has recorded no TOCs from drilling, completions and workover activities. There have been no confirmed odor complaints in the same 4 year period!

### Response

The visual inspection frequencies in the current rule reflect baseline expectations and it is staff's understanding that it is industry practice to physically inspect each well on a similar frequency independent of this existing requirement. In the absence of this inspection, outside of standard industry practice implementation, an unattended well and accompanying well cellar could pose an increased potential for nuisance and emission generation up to a three month period, in addition to any potential for operational or production issues. The noted absence of confirmed odor complaints at a presumed compliant facility may be *prima facie* evidence of the effectiveness of this visual inspection requirement, although use of ambient monitoring by the facility described may also represent a best practice consideration.

### Comment #17

In the first sentence of the odor mitigation requirements section, delete the change to "1,500 feet" and make it "100 meters". Also, insert language "as far as it applies to the actual confirmed odor complaint event" at the end of the sentence associated with specific cause analysis to ensure the Odor Mitigation Requirements address the specific odor that is the subject of the complaint events.

### Response

The proposed amended language has been revised to refer to “confirmed odor event” rather than “odor” with respect to Specific Cause Analysis and related reports.

However, the odor mitigation plan requires facilities to comprehensively review their operations to identify all sources of potential odor and related emission sources as well as the management systems used to minimize nuisance odor potential. As such, the odor mitigation plan is not limited to the specific cause analysis or NOV that triggered the requirement to develop the odor mitigation plan.

See also Response to Comment #14.

### Comment #18

Increase the Notice of Violation (NOV) trigger from one (1) to two (2) in a 12 month period of time for Odor Mitigation Plan and Mitigation Requirements.

This is important since each confirmed odor complaint event has the potential to become an NOV by the activists using their call trees. Industry has experience and evidence from AQMD incident reports that show the activist standing outside a facility soliciting passers bys to call in to increase complaint numbers. A single event should not increase compliance requirements on a company without the opportunity for the company to address and fix. One NOV does not necessarily mean there will be a repeat of the event. It should not be a “one strike you’re out” trigger.

### Response

Currently, receipt of a Rule 402 NOV results in an investigation and assessment of appropriate corrective actions, including potential modifications to operating permits and permit conditions. The role of the Odor Mitigation Plan is to serve as a formal corrective action to address nuisance, for those facilities that have been identified from the complaint process as having the potential for creating a nuisance.

A facility that has received a notice of violation for Rule 402 is understood to have met the standard for having the potential to create a nuisance. Following issuance of an NOV, the facility would have all the rights and remedies available to any facility that has been issued an NOV, including defending against the District’s enforcement action in court. The facility can also go to the Hearing Board and seek a Variance and could dispute the violation, although the Hearing Board would typically rely on the District’s findings and make a determination of whether a Variance is warranted and, if so, the terms for reaching compliance.

### **Comment #19**

The Odor Mitigation Plan should be specific to the actual triggering confirmed odor complaint event, and the rule language should reflect this.

Also, all references to providing leak history and records of releases from any pressure relief devices or vacuum devices attached to vessels should be removed from the proposed amendment because the data is already submitted to the AQMD on a quarterly basis and should be on file.

### **Response**

The odor mitigation plan requires facilities to comprehensively review their operations to identify all sources of potential odor and related emission sources as well as the management systems used to minimize nuisance odor potential. As such, the odor mitigation plan is not limited to the specific cause analysis or NOV that triggered the requirement to develop the odor mitigation plan.

The proposed amendment does not require re-submittal of leak history. It does require facilities to consider leak history in identifying potential sources of odors and associated emissions.

### **Comment #20**

Remove "continual" and "at all times" with respect to the required odor surveillance during well workover activities.

This requirement to conduct continuous odor surveillance downwind at the perimeter of the property would be labor intensive for operators that do not have existing systems for odor surveillance. The existing Rule 1148.1 has recordkeeping and data requirements that industry has satisfied since 2004. The data clearly doesn't support the proposed amendments. Clearly a cost-benefit analysis would find this requirement unsupported.

### **Response**

The proposed requirement is for continual surveillance rather than continuous, with recordings at a minimum hour frequency. As part of the development of an odor mitigation plan, a facility would identify all potential sources of odor and related emissions and the feasible management practices used to minimize nuisance potential. Any benefit analysis conducted by the facility in support of a best practice will be considered by the District should an odor mitigation plan be required.

### **Comment #21**

The requirement to discontinue certain well workover activities due to odor surveillance should contain language as follows: ... perimeter of the facility"and the

odor is confirmed from" drilling, well completion.... ..will discontinue "when the operation is safe to do so" and until the source or cause....

It is infeasible to discontinue operations mid-operation. This is not always feasible due to safety considerations of the well. To stop mid-operation could potentially leave a wellbore uncontrolled and endanger the safety of personnel and the environment. This is an extreme measure for a very expensive operation to shut down before an investigation is even conducted. The odor may not even be coming from these operations.

### **Response**

The proposed amendment language has been revised to directly cross-reference the exemption currently provided in Rule 1148.1 to address safety considerations.

### **Comment #22**

Remove the requirement for electric or alternative fueled workover rigs.

The provisions that require only electric powered or natural gas-, propane-, or butane-fired portable workover rigs is technically infeasible since there are no such rigs available in the United States. At any one time there could be up to 40 portable workover rigs operating in the LA Basin at one time. Even if gas rigs were available, the gas (propane, butane, CNG or LNG) would need storage onsite in large, portable, pressurized tanks. A diesel tractor trailer would be required to pull the tank from location to location for filling. This is both a safety concern as well as a space constraint on location with this type of rig. If the thought is to push electric and/or gas rigs because they are cleaner, as a comparison, a Cummins diesel 14.9 liter, 500 H.P. on road engine, Tier 4 final is certified at .18 ppm NOx (Tier 4 standard is .2 ppm). The PM is certified at .0000 ppm (Tier 4 standard is .01 ppm). So the Tier 4 final certified engines are extremely clean. If this provision is adopted and if the triggers of the provision were met, an operator would not be able to attain/operate such a rig, and thus, be unable to perform necessary well work as required by the DOGGR. The resulting effect is a taking of the operator's rights.

### **Response**

See Response to Comment #1-24.

### **Comment #23**

Remove the requirement to "store any removed drill piping and drill rods in a manner that minimizes emissions from crosswinds through the use of either a tarp or similar covering or by storing within an enclosed area"

The requirement is not feasible. If required, the volume of tarp or plastic sheeting that would be required (since you could not re-use) would create more vehicular criteria pollutant emissions during its transportation and disposal than would ever be emitted

from the drill pipe itself. As noted previously, four years of data collected by one company registered no odor or emission issues from these activities.

### Response

The proposed amendment requires that facilities review the current feasibility of such measures as part of any required odor mitigation plan. Any benefit analysis conducted by the facility in support of an alternative best practice will be considered by the District should an odor mitigation plan be required. In addition, the proposed amended rule language and staff report have been revised to remove reference to the terms “tarping” and “covering”.

### Comment #24

Delete the changes that require more stringent LDAR. See comment 16 above regarding operator’s data (air monitoring data for past 4 years and 1148.1 data for past 10 years) supporting no evidence which justifies the reduction in repair time under Rule 1173. The proposed changes create internally inconsistent language within existing AQMD rules and make it more burdensome for operators to comply.

The changes add confusion to Rule 1173. When would rule 1173 not be applicable? How would a leak be identified and quantified if not per Rule 1173 Inspection and Maintenance (I&M) Program? Using the District approved “CAPCOA-REVISED 1995 EPA CORRELATION EQUATIONS AND FACTORS” for calculation of fugitive emissions from equipment leaks, the total hydrocarbon (THC) emissions from a valve leaking at an EPA Method 21 screening value of 250 ppmv is calculated to be less than 1/1,000th of one pound per day. Furthermore, using a typical speciation profile for produced gas from a well in the South Coast Basin, the benzene associated with such a leak is calculated to be approximately 1/1,000,000th of one pound per day. Do these levels of emissions justify even the current required component repair times, let alone the proposed more stringent ones?

### Response

The proposed language clearly identifies consideration of a shorter repair time than currently required under Rule 1173 for facilities that are subject to an odor mitigation plan and where an odor nuisance potential has been identified through a specific cause analysis or by the facility during the development of the odor mitigation plan. Because a facility will be identifying this measure as part of an odor mitigation plan that is submitted to the SCAQMD for approval, there would be no confusion with respect to the applicability of either rule or the odor mitigation plan.

### Comment #25

The feasibility determination in the Odor Migration Plan should include the following language .....is not feasible to include "or is not related to the confirmed odor complaint events(s) at the facility" subject to approval...." to ensure the Odor

Monitoring and Mitigation Requirements address the specific odor that is the subject of the complaint event(s).

### Response

The odor mitigation plan is intended to support a facility's overall odor management system. As such, it is a comprehensive evaluation of a facility's operation, including operational procedures and odor management procedures, which are not limited to the specific cause analysis or notice of violation that may have triggered the requirement for the plan.

### Comment #26

The Test Methods section should include the following language: .....Method 21 using an appropriate analyzer calibrated with methane "or any other method demonstrated by the applicant to be equivalent and approved in writing." The analyzer..... Reinstate original "(h)(4) Equipment Test Methods", which is shown as a strike through in this version of the rule.

The change could allow the use of a PID, which is the preferred and most cost effective measurement device in many instances. TVA's measure specifically TOC's and PID's measure specifically VOC's. TVA's are calibrated with methane and PID's are calibrated with hexane. Cost of a TVA is \$17,000 and cost of a PID is \$3,000. A TVA has an ignition source with a flame. Since well cellars are class 1 division 2 according to American Petroleum Institute Recommended Practice 500B, which means non-explosion proof equipment, is not allowed in the area without monitoring equipment and a hot work permit, the PID is the preferred measurement device. The PID is explosion proof and the TVA is not. Additionally, the goal of 1173 and 1176 is to control VOC's. Perhaps there could be an adjustment to the limit of 250 ppm TOC's to an appropriate VOC ppm limit.

### Response

The provisions for the use of alternative test methods have not been deleted in the proposed amendment. Rather, the language has been relocated to the beginning of subdivision (h) with the same applicability as the current rule, including allowing a facility to use a PID for monitoring purposes where approved.

### Comment #27

The written request and justification for development of a company safety manual that is to be submitted to the Executive Officer, needs to have a defined timeline for approval by the District. It is recommended that a 30-day approval process be defined in the Rule for whether the justification meets the criteria for this exemption.

A time line needs to be added so as not to impede the activities of the operator being requested for exemption. An additional proposal would be to discuss a CIPA member

submittal for an industry-wide justification since the safety considerations would be industry-wide in nature.

### **Response**

The submittal language was removed from the prior iteration of the proposed amended rule. The demonstration would be required as part of use of the proposed exemption in the event any compliance related SCAQMD investigation.

### **Comment #28**

Remove the changes to "1,500 feet" and maintain existing rule language of "100 meters" associated with the exemption provided for low producing wells.

### **Response**

The proposed language has been revised to continue the exemption for low producing wells located outside of 100 meters of a sensitive receptor.

### **Comment #29**

Change the rule to require an Odor Mitigation Plan for every facility upon rule adoption—do not require waiting until after odor complaints occur.

### **Response**

See Response to Comment #2.

### **Comment #30**

AQMD should commit to providing an evaluation of onsite monitoring and monitoring options for the community. Monitoring alarms and systems should be outlined in the rule.

### **Response**

SCAQMD is currently reviewing emerging monitoring technologies with particular emphasis on lower cost fence-line monitoring capabilities to supplement existing inventory efforts. Oil and Gas Production Facilities are part of this ongoing effort. Additional descriptions of the systems and capabilities under review are included in Appendix A – Monitoring Systems for the Oil and Gas Production Industry to the staff report.

### **Comment #31**

AQMD should provide the public with an evaluation of Best Available Retrofit Control Technology (BARCT) for all existing oil drilling and Best Available Control Technology (BACT) for new, modified and expanded operations, including best available equipment, inspection techniques, and best practices.

### Response

A brief discussion on BACT and BARCT has been included in the Draft Staff Report.

See also Response to Comment #3.

### Comment #32

The proposed amendment should also include monitoring and mitigation plans to prevent oil spraying of houses and vehicles during initial and ongoing operations.

### Response

The incident noted ~~should be~~ is typically handled under Rule 402 - Nuisance. PAR1148.1 is intended to bridge the gap for odors in part because of the concurrent VOC emission reduction potential. Oil deposition should be handled on a case-by-case basis. ~~Until the case noted has been addressed, it is unclear what universal standards would be applicable to all facilities, and as such, the proposed amendment has been revised to incorporate the requirements of a Specific Cause Analysis for any Confirmed Oil Deposition Event, which has been defined as an occurrence of property damage due to the airborne release of oil or oil mist from an oil and gas production facility, as verified by District personnel.~~

### Comment #33

A hazardous risk analysis should be performed for any facilities using or storing hydrogen fluoride

### Response

Well acidization activities, including use of hydrogen fluoride, is not covered by Rule 1148.1, but these activities are included as part of Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers implementation. Any additional requirements associated with well stimulation based on the data obtained under Rule 1148.2 would be addressed in a subsequent rule development effort.

### Comment #34

Diesel truck emissions and other diesel engine emissions as well as analysis of benzene, toluene, ethyl benzene and xylene (BTEX) compounds should be part of the proposed amendment for facilities located within 1,500 feet of a sensitive receptor.

### Response

These activities are currently subject to Rules 1401, 1402, 1470, and the AB2588 program and annual emission reporting programs, and are regulated in various ways and by various agencies.



### **Comment #35**

The proposed amendment should require that all information be made publicly available to provide opportunity for public comments and be responsive to these comments. More transparency is needed for all new and existing drilling operations to provide all of the plans and reports including all specific cause analysis reports, and all odor mitigation plans.

### **Response**

The requirements for managing information associated with confirmed odor events will be addressed through implementation of the Board Resolution item included with the Final Hearing Package. This may include, but are not limited to, a specific SCAQMD website that could list confirmed odor events and specific cause analysis reports submitted by facilities.

### **Comment #36**

The odor mitigation plan should be updated to address any reported odors that occur whether confirmed or unconfirmed

### **Response**

There would be little legal standing to enforce an unconfirmed odor complaint. However, facilities are free to voluntarily conduct an internal investigation and work directly with complainants on any unconfirmed complaints. Staff believes that the required signage under the proposed amended rule may also encourage the complainants to contact the facility first to accelerate corrective actions.

### **Comment #37**

Require operators to update standard operating procedures (SOP) under subparagraph (f)(2)(C) and other work practice plans should be required to prevent future re-occurrences of odors.

### **Response**

The provisions of this section of the proposed amendment have been strengthened to require facilities to document the rationale for not including specific considerations.

### **Comment #38**

Require records to be maintained for 10 years.

### **Response**

Current record retention under Rule 1148.1 is a three-year retention, with a five year retention for major sources subject to Title V of the federal Clean Air Act. In general, the record retention requirements are established based on the

compliance schedule for any applicable regulatory requirement. In many cases, an annual requirement would be accompanied by a two-year retention to ensure that regulated facilities are capable of demonstrating compliance through the next compliance milestone. Permit applications are generally required for the life of the permitted equipment to ensure adherence to the facility representation of the equipment potential to emit. Staff does not believe that a 10-year universal record retention is accompanied by an applicable regulatory milestone, and therefore does not recommend extending the current retention requirements.

### **Comment #39**

Require at a minimum the same level of leak detection and repair that is mandated for oil refineries including frequent inspections. Furthermore, the proposed amendment should not allow standing oil in well cellars.

### **Response**

Oil and Gas Production Facilities are currently subject to Rule 1173. Additional leak detection and repair is part of the current Rule 1148.1. The proposed amendment further increases the stringency of this requirement by tightening the leak repair time for facilities subject to an odor mitigation plan, and also requires accelerated clean-up of wells that exceed 250 ppmv and that are located within 1,500 feet of a sensitive receptor, which is more stringent than the existing requirement that applies to wells located within 100 meters (328 feet) of a sensitive receptor.

In addition, the proposed amended rule language has been updated to require monthly inspections for any component identified as an odor source as part of a specific cause analysis until six consecutive months where the measurement does not exceed the regulatory leak thresholds.

Finally, the proposed amended rule language has been revised to include a requirement to pump out or remove organic liquid that has accumulated in the well cellar by the end of the day following three complaints in a single day as verified by District personnel.

### **Comment #40**

Improve fugitive emission control beyond simple tarps requiring more protective fugitive emission control to protect against evaporation. Nonetheless, the proposed rule incorporates additional best practices, such as the use of a grommet, to further minimize odors associated with oil and gas production facilities.

### **Response**

The proposed use of a covering or tarps ~~is was~~ for a specific activity and intended to minimize odors. Oil and Gas Production Facilities are currently subject to various fugitive emission control requirements, including Rules 461, 1173, 1176,

and the existing elements in Rule 1148.1. Nevertheless, reference to the use of tarps or coverings has been removed from the proposed amended rule language and staff report.

### **Comment #41**

Minimize on-site combustion as much as possible in concert with eliminating fugitive leaks and venting of gases

### **Response**

Combustion emissions are subject to current permitting and BACT requirements. The trend toward the use of micro turbines over flaring balances the overall environmental impacts.

### **Public Consultation Meeting Comments**

The following comments were received at the May 28, 2015 public consultation meeting:

### **Comment #42**

The trigger for the requirement to perform monthly inspections on specific components identified in a specific cause analysis should refer to those that have “caused or likely to have caused” the confirmed odor event rather than being referenced as a “potential” source, in order to be consistent with other proposed amended rule language.

### **Response**

The proposed amended rule language has been updated for consistency as follows:

[...] the operator of an oil and gas production facility shall conduct a monthly TOC measurement on any component that has been identified as a potential odor nuisance source causing or likely to have caused the confirmed odor event through a submitted specific cause analysis report submitted in accordance with the provisions of subdivision (f). [...]

### **Comment #43**

The reference to drill piping and drill rods in the proposed amended rule language may be better referred to as production tubing and sucker rods to reflect industry terminology for oil and gas production facilities.

### **Response**

The proposed amended rule language has been updated as follows:

[...] The oil and gas production facility shall store any removed drill piping, production tubing and sucker rods in a manner that minimizes emissions from crosswinds [...]

References within the staff report have been similarly updated for consistency.

### **Comment #44**

Please clarify further the types of monitoring systems that would meet the requirements of paragraph (d)(12) of PAR1148.1. Facilities' monitoring capability varies from site to site and most do not have dedicated LEL monitors throughout the site.

### **Response**

Staff considers the various process monitoring and fire alarm systems in use today to meet the requirements of paragraph (d)(12) of PAR1148.1, which requires that such systems be used and maintained in operational condition. The rule language has been further revised to clarify that such systems be capable of alarming or notifying (rather than alarming and notifying) operators to ensure timely response to a response condition in consideration of the various systems currently in use. The requirement for a centrally located monitoring system has been further revised to apply only to central processing areas of an oil and gas production facility located within 1,500 feet of a sensitive receptor, in order to monitor and ensure proper facility operation. Any additional requirements that may apply as part of an odor mitigation plan would be integrated into either an existing system or as part of a new installation and may apply to specific equipment, processes or activity identified as causing or likely to have caused a confirmed odor event or Notice of Violation, rather than to the facility as a whole.

(Please also see response to Comment #1-8 and Comment #15)

### **Public Consultation Meeting Written Comment**

The following comment letter was received from the California Independent Petroleum Association, dated June 9, 2015. The letter has been bracketed for cross-referencing with corresponding responses following each page.

**Comment Letter #2**



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E-Mail: [blair@cipa.org](mailto:blair@cipa.org)

June 9, 2015

Naveen Berry, Planning & Rules Manager  
Phillip Fine, Assistant Deputy Executive Officer  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

VIA ELECTRONIC MAIL

RE: Draft Revisions to Rule 1148.1.-Jun15 Version

Dear Mr. Berry:

The California Independent Petroleum Association (CIPA) respectfully submits our third round of comments on the proposed revisions to Rule 1148.1. CIPA is a non-profit, non-partisan trade organization representing over 170 oil and gas producers and over 350 associate members throughout California, including operators throughout the LA Basin. CIPA respectfully continues to question the need for the proposed rule revisions, especially given that the concerns voiced by the District are already dealt with by other District Rules, including Rules 402, 1173 and 1176. We also continue to be concerned that the proposed revisions single out a specific industry, include infeasible requirements, and would provide no meaningful improvements at significant expense.

2-1

***General Comments***

The data collected in accordance with the requirements of Rules 1148.1 and 1148.2, odor and nuisance complaint records including SCAQMD investigations, and specific oil production site data does NOT, except in a few specific instances, support any action by the District. In particular, a broad rulemaking solution is not warranted when there is no identified, verified, or persistent widespread problem to be solved.

2-2

The data and evidence presented by the District indicates that oil and gas operations does not pose any more or less of an issue than other industrial operations or land uses throughout the area and, thus, does not warrant separate rulemaking action outside of Rule 402. There is no evidence of significant widespread odor impacts from existing oil and gas operations. Thus, there is no justification for the proposed rulemaking. In fact, there is substantial evidence to the contrary. In apparent response to our previous requests for such data, the District has included some historical odor complaint data related to oil and gas production facilities in its final staff report. This data indicates that more than 98% of the odor complaint history is associated with five specific facilities, each of which is located in a high density residential area. Thus, we believe this data supports our position that rulemaking which imposes additional requirements and significant cost impacts on all oil and gas production facilities is not warranted.

2-3

**Response to Comment #2-1**

See Response to Comment #1-1, #1-5, and #1-9.

**Response to Comment #2-2**

See Response to Comment #1-1, #1-5, and #1-9.

**Response to Comment #2-3**

See Response to Comment #1-1, #1-5, and #1-9.

**Comment Letter #2 (cont.)**

removed from wells, component leaks, exhaust from diesel engines, etc.) may have been responsible for, or contributed to, the odors. CIPA specifically requested such information in its previous comments, but it has yet to be provided. Without such data, the rule amendments being proposed by the District amount to a broad mixture of control measure “guesses”, most of which are likely to have no effect, as opposed to specific data-driven measures that address a specific problem or problems. As a result, the proposed rule amendments will be highly cost-ineffective, achieving little if any emissions reductions while imposing significant additional operating costs.

2-4

Beyond these general concerns, CIPA has the following specific concerns regarding the proposed rule language:

**1500 Foot Distance to Sensitive Receptor as Trigger for Additional Requirements**

There is no basis for the proposed change to require well cellar pump-outs within one day (vs. five days) for well cellars located within 1500 feet (vs. 100 meters) of a sensitive receptor. First, the 1500 foot criterion is arbitrary and not based on any data or scientific analysis. Further, we are not aware of any confirmed odor complaints that have identified well cellars as the cause of odors. Increasing the distance criterion from 100 meters to 1500 feet will subject hundreds, possibly thousands, of additional well cellars to this requirement, significantly increasing costs and potentially requiring the use of additional vacuum trucks and other vehicles on surface streets, resulting in increased vehicular traffic and emissions.

2-5

**Monitoring and Alarm System**

As reflected in the Final Staff Report, District staff has stated that it believes all (or nearly all?) operators already have a system in place that satisfies this requirement. But, because the District has not defined the characteristics of an acceptable system, this is far from clear to operators. At the May 28, 2015, Public Consultation Meeting, staff described a configuration of LEL (lower explosion limit) monitors tied into a central alarm system as an example of what would satisfy this requirement and stated their belief that virtually all facilities already have such a system in place. But this is not the case. Thus, this requirement should either be eliminated or District staff should officially deem that existing systems, whatever they are, already meet this requirement. Depending on exactly what the Districts’ requirements for a monitoring and alarm system are, there may be significant costs associated with required system upgrades.

2-6

**Trigger for Odor Mitigation Plan**

A single NOV should not trigger additional compliance requirements of any kind. An operator should have an opportunity to address and fix the problem that led to the NOV. This is a “one 11strike and you’re out” mentality. Two nuisance NOV’s in any six month period would be a more reasonable trigger.

2-7

**Odor Mitigation Plan Requirement for Storage of Piping and Rods Removed from a Well**

The requirement to store removed piping and rods in “an enclosed area or other equivalent method” is not reasonable considering the cost impact and the small amount and short duration of the emissions likely involved. Enclosed structures or an “equivalent method” may be feasible for a few limited urban facilities with small footprints, but not for larger facilities extending over wide areas. At the May 28, 2015, Public Consultation Meeting, staff described “a tented structure and negative air machine” as an example of an “equivalent method”. But this is not

2-8

**Comment Letter #2 (cont.)**

practical for most facilities. It would be costly and ineffective and would create additional unnecessary vehicular traffic and emissions during each well activity. Most well locations at larger facilities would require a gasoline or diesel engine to power the negative air machine, creating still more emissions and noise. Also at the May 28, 2015, Public Consultation meeting District staff verbally agreed that piping and rods are not "stored" while temporarily standing in the derrick of a rig during a well activity. But language in the staff report conflicts with this. It is not reasonable for storage requirements to apply to piping and rods temporarily standing in the derrick of a rig while well work is being performed. Finally, the general requirement for the use of rubber grommets to wipe excess liquid from piping and rods as they are removed from a well should minimize the potential for piping and rods to be sources of emissions and odors.

2-8

***Comments on Final Staff Report***

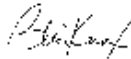
Additional comments on specific aspects of the Final Staff Report are contained in the attachment.

***Summary***

CIPA continues to be in disagreement regarding the need for and the overall scope and many of the specific requirements in the proposed amended rule.

Thank you in advance for your consideration of our comments. CIPA appreciate the opportunity to have met with District staff in January and again via telephone in April to discuss our concerns with the proposed amended rule. Please feel free to contact me should you have any questions.

Sincerely,



Blair Knox  
CIPA Director of Regional Affairs



### **Response to Comment #2-4**

The current complaint investigation process under the implementation of Rule 402 – Nuisance involves tracing of odors at the location of the complainant to a source, which can be as broad as a facility. PAR1148.1 adds the requirement for a specific cause analysis for confirmed odor events, which would drive the identification of the activity or equipment that caused or was likely to have caused the odor. This additional enforcement mechanism is not currently in place and consequently identification of the activity or equipment contributing to an odor complaint is not consistently available. However, because the requirements of PAR1148.1 are event driven, only those facilities that trigger the additional requirements would be affected prospectively, using specific data driven measures to address any facility identified specific problem or problems through a specific cause analysis and submitted report.

See also Response to Comment #1-1 and 1-6.

### **Response to Comment #2-5**

The requirement to remove accumulated organic material from a well cellar within the following business day rather than within the five days following detection would merely push the job for any required vacuum trucks to an earlier date rather than create additional jobs. Industry has indicated that well cellars are typically well maintained, leading to the conclusion that required repairs are generally infrequent such that a following day clean out requirement would not result in more trips than would be required under a five-day carryover. However, for those well cellars located in closer proximity to sensitive receptors, a more rapid clean out would serve to reduce the potential for odor nuisance. Over the five-year period reviewed as part of Appendix B, both of the Rule 1148.1 NOVs identified in the sample were associated with the well cellars, and both were immediately precipitated by community complaints for odor.

See also Response to Comment #1-25.

### **Response to Comment #2-6**

Staff considers the various process monitoring and fire alarm systems in use today to meet the requirements of paragraph (d)(12) of PAR1148.1, provided that the systems in place are used and maintained in operational condition. Staff’s verbal description of a configuration of lower explosion limit (LEL) monitors tied into a central alarm system was representative of a type of system observed, but did not represent the expectation for all facilities. Locations with fewer wells having a facility-based system rather than a system with individual well monitoring may be sufficient to provide the protection needed to respond to fire or safety hazards, in accordance with applicable federal, state or local building or fire safety regulations. In addition, the requirement for a centrally located monitoring system has been revised to limit the requirement to facilities with central processing areas located within 1,500 feet of a sensitive receptor. As noted in the staff report, facilities would not be expected to install new systems. However, to address any potentially unaccounted facilities, staff

has added additional costs reflecting roughly five percent of the facility population to the analysis.

The staff report has been updated to further clarify the purpose of the central monitoring system envisioned by the proposed amendment as follows:

Oil and gas production facilities generally monitor equipment for safety process or fire protection purposes to comply with a broad range of federal, state or local building or fire safety regulations, and thus typically have a gas detection program. In addition, these systems can support implementation of the General Duty Clause of the Clean Air Act, Section 112(r) as part of a facility hazard assessment and accidental release prevention program, typically from a central location. Some facilities utilize control centers that also allow for monitoring and controlling operating parameters to support efficiency or serve as an indicator for leak related emissions.

See also Response to Comment #1-8 and Comment #44.

### **Response to Comment #2-7**

A facility that has received an NOV for Rule 402 is understood to have met the standard for having the potential to create a nuisance. Currently, the threshold for triggering an NOV is high – typically requiring six independent complaints confirmed from the same occurrence. Prior to receiving an NOV for Rule 402, under PAR1148.1, a facility can experience one or more confirmed odor events, or receive one or more complaints, each acting as a lower level compliance action that would not trigger the requirement for an Odor Mitigation Plan (OMP). Because an OMP is meant to prevent public nuisance, the actual issuance of an NOV for Rule 402 would represent a failure of the facility’s odor mitigation practices and the need for an OMP or a revision to an existing plan.

See also Response to Comment #18.

### **Response to Comment #2-8**

The staff report has been revised to distinguish between the vertical staging of piping or rods on a derrick and the subsequent storage of removed rods subject to the odor mitigation plan requirement of paragraph (g)(3)(C).

See also Response to Comment #43.

**Comment Letter #2 (cont.)**

**PAR 1148.1 Final Staff Report – CIPA Comments**

*(Italics are excerpts from the Final Staff Report dated June 2015)*

**Executive Summary**

- o *(p1) An increased awareness of oil and gas production wells due to community concerns over potential environmental impacts from well stimulation techniques such as hydraulic fracturing has resulted in a goal to minimize impacts to nearby residents and sensitive receptors from ongoing operations that do not include drilling.*

And

- o *(p1) As a separate, but concurrent effort, proposed amendments to Rule 1148.1 address the production and maintenance aspects of an operating oil and gas well, rather than the pre-production or stimulation aspects covered under the requirements of Rule 1148.2.*
  - Either revise these statements to reflect that drilling operations are addressed in the rule or remove the rule requirements applicable to drilling (e.g., rubber grommet for “drill piping”, monitoring and mitigation of “drilling”, and storage of “drill piping”)

- o *(p1) The proposed amendment incorporates some of the information gathered through the reporting mechanisms provided by Rule 1148.2*
  - Please provide a reference to which provisions of the rule does this refer to?

- o *(p1) There is no anticipated significant cost increases associated with the proposed amendment because the amended rule focuses on improving work practices and establishing odor mitigation procedures as a contingency, rather than on additional engineering controls. Any additional cost impact associated with implementation of improved work practices and odor mitigation procedures are expected to be administrative and nominal.*

- There are cost increases associated with requirements to:
  - General:
    - o remove fluids > 250 ppmv from more well cellars (those within 1500 feet vs. 100 meters) within one day (vs. five days) (this will increase emissions from vacuum trucks)
    - o install and operate a “monitoring system” to provide notification / alarm to a “central location” (unclear what constitutes a satisfactory system)
    - o perform monthly (vs. quarterly) fugitive component inspections for components “identified as a potential odor nuisance source through a submitted specific cause analysis report”.
  - Once a facility is required to have an Odor Mitigation Plan:
    - o Provide an enclosure or equivalent controls for pipe and rods when “stored”
    - o repair leaks > 250 ppmv from more components (those within 1500 feet) within one day (vs. 2-7 days)
  - In addition, even administrative actions (e.g., responding to anticipated increased odor complaints resulting from signage “inviting” the public to call AQMD, increased recordkeeping, and preparing Specific Cause Analyses an

2-9

2-10

2-11

### **Response to Comment #2-9**

PAR1148.1 applies to the operation and maintenance activities at oil and gas production facilities. Odor nuisance related aspects associated with drilling, well completion or rework at an oil and gas production facility are subject to the odor mitigation plan requirements that are triggered following receipt of an NOV for Rule 402 – Nuisance, or notification of three or more confirmed odor events in a six month period.

The executive summary has been revised as follows:

As a separate, but concurrent effort, proposed amendments to Rule 1148.1 address the ~~production~~ operation and maintenance aspects of an ~~operating~~ oil and gas well production facility, rather than the pre-production or stimulation aspects covered under the requirements of Rule 1148.2.

See also Response to Comment #43.

### **Response to Comment #2-10**

As noted, some of the information gathered through the reporting mechanism provided by Rule 1148.2 led to the previous provisions associated with alternative fueled or electric powered workover rigs. As these provisions have been removed from the proposal, the staff report has been updated to remove this cross-reference.

### **Response to Comment #2-11**

The Executive Summary statement also includes a reference to the cost impact associated with specific cause analysis. Please refer to the Cost Analysis and Socioeconomic Impacts section of the staff report, which outlines the cost estimates associated with the provisions of the rule.

See also Response to Comment #2-6.

**Comment Letter #2 (cont.)**

<p>Odor Mitigation Plans) have costs (unless current employees have spare time on their hands).</p>	<p>2-11</p>
<p><b>Background</b></p>	
<ul style="list-style-type: none"> <li>○ (p5) Wellheads are susceptible to liquid leaks especially where the stuff box is poorly maintained or when large valves are opened and then closed, which often produces a noticeable amount of liquids, including hydrocarbons.             <ul style="list-style-type: none"> <li>▪ “Stuff box” should be “stuffing box”</li> <li>▪ A “noticeable amount of liquids” are produced “when large valves are opened and then closed”. Don’t understand this. Are valves likely to leak to when opened and then closed? And large valves more so than small valves?</li> </ul> </li> </ul>	<p>2-12</p>
<ul style="list-style-type: none"> <li>○ (p5) If the liquid is allowed to stand over an extended period, VOC emissions and related odors may be released to the atmosphere, and may lead to odor nuisance complaints from the local community.</li> </ul>	
<p>And</p>	<p>2-13</p>
<ul style="list-style-type: none"> <li>○ (p6) ..... well cellars are uncovered and can become sources of VOC emissions and associated odors when crude oil is collected and retained in this containment area for an extended period of time.             <ul style="list-style-type: none"> <li>▪ Most emissions from a liquid leak “flash” within a short time of the leak; relatively small amounts of emissions occur as a result of “weathered” crude standing for “an extended period”.</li> </ul> </li> </ul>	
<ul style="list-style-type: none"> <li>○ (p6) Some of the equipment that require permits by the SCAQMD include American Petroleum Institute (API) separators....             <ul style="list-style-type: none"> <li>▪ API separators? – Believe this terminology refers to large refinery waste water separators / basins as opposed to production separators in oilfields (which are typically pressure vessels).</li> </ul> </li> </ul>	<p>2-14</p>
<ul style="list-style-type: none"> <li>○ (p6) Gas collected from separators and oil treaters, along with vapors from storage tanks, may be processed through a glycol dehydration unit. This unit removes the water from the gas before it is put into a sales pipeline or used again in the dehydration process.             <ul style="list-style-type: none"> <li>▪ “used again in the dehydration process”? Don’t understand this. Maybe it should be “or before being used as fuel or re-injected in subsurface”?</li> </ul> </li> </ul>	<p>2-15</p>
<ul style="list-style-type: none"> <li>○ (p7) The rods and the piping are pulled up through a casing which is filled with oil and other organic liquid.             <ul style="list-style-type: none"> <li>▪ “filled with oil and other organic liquid”? This is overstated and misleading. Most SoCal wells produce 95%+ water and have reservoir pressures that are insufficient to support a column of liquid in the wellbore that extends all or even most of the way to the surface, so the casing is never “filled with oil and other organic liquid”.</li> </ul> </li> </ul>	<p>2-16</p>
<ul style="list-style-type: none"> <li>○ (p7) While the amount of VOC emissions released to atmosphere is short-term, the odor potential is great, unless measures are taken to wipe excess material during removal.</li> </ul>	<p>2-17</p>

### **Response to Comment #2-12**

The staff report has been revised to correct the reference to stuffing box and with respect to large valves as follows:

[...] susceptible to liquid leaks especially where the stuffing box is or large valves are poorly maintained ~~or when large valves are opened and then closed~~, which ~~often produces a~~ can result in noticeable amounts of liquids, including hydrocarbons. [...]

### **Response to Comment #2-13**

Although “weathered” crude oil may contain lower amounts of VOC, the potential for emissions and odors is greater from a well cellar containing weathered crude than one that is free of organics. In addition, the accumulated organic material in the cellar may limit the ability to identify the source of the accumulation or to determine if there is an ongoing leak that requires repair. However, the staff report has been updated to remove the reference to an extended period of time to remove any potential ambiguity of the statement as follows:

[...] can become sources of VOC emissions and associated odors when crude oil is collected and retained in this containment area ~~for an extended period of time~~.

See also Response to Comment #2-5.

### **Response to Comment #2-14**

The term “API Separator” is derived from the fact that such separators are designed according to standards published by the American Petroleum Institute (API); API separators include those that can be used at oil and gas production facilities. However, because the criterion for permitting is based on the air/liquid interfacial area [greater than 45 square feet air/liquid interfacial area requires an air permit per paragraph (n)(6) of Rule 219 – Equipment Not Requiring a Written Permit Pursuant to Regulation II], the staff report has been updated to refer to “large oil/water separators” rather than “API separators.”

### **Response to Comment #2-15**

The staff report has been revised to include the following clarification based on this comment:

“[...]This unit removes water from the gas before it is put into a sales pipeline, or used as fuel, or re-injected into the subsurface.[...]”

### **Response to Comment #2-16**

The staff report has been revised to refer to “contains oil and other liquid” rather than “is filled with oil and other organic liquid” to meet the intent of the comment.

### **Response to Comment #2-17**

The reference to elevated odor potential from removing sucker rods and production tubing while wet was identified by operators to District staff during field visits, although it was also indicated that most maintenance and repair activities do not involve wet removal. As included in the proposed amended rule, the current practice by some facilities of using a grommet to remove excess material from the sucker rods and production tubing is a simple approach to minimize potential odors.

**Comment Letter #2 (cont.)**

<ul style="list-style-type: none"> <li>▪ “odor potential is great”? This is subjective statement that indicates staff bias and should be removed.</li> </ul>	<p>2-17</p>
<ul style="list-style-type: none"> <li>○ (p10) Operators of oil wells and well cellars are not required to obtain SCAQMD permits for that equipment and not all oil wells utilize well cellars. Only those facilities with equipment such as API separators, tanks, vessels, heaters, boilers, internal combustion engines and clean-out sumps (part of the dehydration or wastewater system permit unit), and “control” equipment such as heaters, flares, gas treatment equipment, internal combustion engines, microturbines, and boilers would have SCAQMD permits.             <ul style="list-style-type: none"> <li>▪ Inconsistent terminology, i.e., AQMD’s AER group and AER reporting tool refer to R222 well registrations as permits and these registrations have assigned A/N’s and Permit #’s.</li> </ul> </li> </ul>	<p>2-18</p>
<ul style="list-style-type: none"> <li>○ (p10 - Table 2) Permitted or Registered SCAQMD Oil and Gas Production Facilities?             <ul style="list-style-type: none"> <li>▪ Is this the number of registered oil well groups (vs. facilities)?                 <ul style="list-style-type: none"> <li>• 144 RECLAIM</li> <li>• 329 non-RECLAIM</li> </ul> </li> <li>▪ Table is confusing, i.e., facilities vs. wells vs. R222 oil well groups</li> </ul> </li> </ul>	<p>2-19</p>
<p><b>Odor Mitigation Work Practices and Associated Activities</b></p>	
<ul style="list-style-type: none"> <li>○ (p12 – Table 3) .... staff reviewed 100 out of 403 (roughly 25%) oil and gas production facilities, with only nine facilities identified as having more than one odor complaint, both confirmed and unconfirmed (alleged) over the last 5 years (2010 through 2014).             <ul style="list-style-type: none"> <li>▪ 91% of the complaints are associated with three facilities</li> <li>▪ 96.5% of the complaints are associated with three operators</li> <li>▪ What is the justification for imposing additional requirements on other operators / facilities?</li> </ul> </li> </ul>	<p>2-20</p>
<p><b>Summary of Proposed Amendment</b></p>	
<ul style="list-style-type: none"> <li>○ (p15) Effective 30 days after adoption, an oil and gas production facility, under the proposed amendment, will be required to utilize a rubber grommet designed for drill piping to remove excess or free flowing fluid from piping that is removed during any maintenance or drill piping replacement activity that involves the use the use of workover rig. (d)(10)             <ul style="list-style-type: none"> <li>▪ “drill piping”? Is this requirement intended to apply to drilling operations? Or should “drill piping” be changed to “production tubing”?</li> </ul> </li> </ul>	<p>2-21</p>
<ul style="list-style-type: none"> <li>○ (p17) The Specific Cause Analysis includes a brief review of the activities and equipment at the facility identified as contributing or causing the odor in question in order to determine the contributing factors and ultimately the corrective actions associated with the event. And The scope of the Specific Cause Analysis is limited to the possible origins and causes of the Confirmed Odor Event,             <ul style="list-style-type: none"> <li>▪ What if the source of the odor cannot be determined?</li> </ul> </li> </ul>	<p>2-22</p>
<ul style="list-style-type: none"> <li>○ (p19 – Table 6) If odors are detected from odor surveillance or odor monitoring at the perimeter of the facility, all drilling, well completion, or rework, repair, or maintenance of any well will discontinue until the source or cause of odors are determined and mitigated in accordance with measures previously approved.             <ul style="list-style-type: none"> <li>▪ What if the source of the odor is not from the well activity? Well activity should not be impacted unless it is determined to be the source of the odor</li> </ul> </li> </ul>	<p>2-23</p>



### **Response to Comment #2-18**

Under the SCAQMD Annual Emissions Reporting (AER) program pursuant to Regulation III, facilities are required to report emissions from both permitted and non-permitted equipment/devices and processes annually, if the facility's actual emissions are above the reporting thresholds specified in Rule 301(e) Table III and IV. The AER reporting tools allow for tracking of equipment that does not require a permit as "Emission Sources", and for those entries, the application numbers and permit numbers are not used. Additional instructions for completing the AER are available on the SCAQMD website ("Accessing Facility and Completing the Report" under the help section: <http://www3.aqmd.gov/webappl/help/newaer/index.html>)

### **Response to Comment #2-19**

The number referred to in the comment applies to the number of facilities, which is based on SCAQMD facility ID numbers. The table refers to the number of facilities. For clarification, the first column has been revised to refer to "Oil and Gas Production," rather than "Oil Wells."

### **Response to Comment #2-20**

The majority of the requirements of PAR1148.1 only apply to facilities if certain odor related event thresholds are met. As such, based on complaint history, most facilities would not become subject to the requirements for specific cause analysis or for an odor mitigation plan. These requirements are meant to prevent a public nuisance, which is a significant event, and mainly reflect best practices currently implemented at facilities that do not have a historical complaint issue.

See also Response to Comment #1-1.

### **Response to Comment #2-21**

See Response to Comment #2-9 and Comment #43.

### **Response to Comment #2-22**

The submitted Specific Cause Analysis Report includes the equipment or activity identified as causing or likely to have the event, as well as the steps taken to identify the source and cause of the event, and corrective measures to prevent recurrence of a similar event. Because a Specific Cause Analysis is only triggered after confirmation of the event by District personnel, the source of the odor is the facility, and it is incumbent on the facility operator to trace the odor to the activity or equipment to best derive the corrective measures necessary to address the immediate event and to prevent future events. Should identification of the specific activity or equipment prove elusive, the Specific Cause Analysis Report should contain the details necessary to demonstrate the operators' level of due diligence taken to ensure the prevention of future events.

See also Response to Comment #18.

### **Response to Comment #2-23**

Table 8 of the staff report has been updated to reflect the revised rule language as follows:

If odors are detected from odor surveillance or odor monitoring at the perimeter of the facility, ~~and~~ and confirmed from drilling, well completion, or rework, repair, or maintenance, the associated drilling, well completion, or rework, repair, or maintenance of any well will discontinue until the source or cause of odors are determined and mitigated in accordance with measures previously approved.

**Comment Letter #2 (cont.)**

<ul style="list-style-type: none"> <li>▪ What if the source of the odor is not even from a source within the facility? A facility's operations should not be impacted by an odor from a different facility.</li> <li>▪ What if the source of odor cannot be determined?</li> <li>▪ No activity should be impacted until and unless it is determined to be a source of odors.</li> <li>▪ (This table entry needs to be updated to reflect recent changes to the proposed amended rule.)</li> </ul>	2-23
<p><b>Emission Inventory</b></p> <ul style="list-style-type: none"> <li>○ (P20) Staff does not expect any emission reductions or increases because the proposed amendment does not change any VOC standards, and is primarily intended to provide enforceable mechanisms to reduce nuisance odor potential and is otherwise administrative in nature.             <ul style="list-style-type: none"> <li>▪ If there's no decrease in emissions, it's not reasonable to expect fewer odor events</li> <li>▪ Well cellar pump-out standards are being changed (1500 feet vs. 100 meters requires pump out within one day vs. 5 days)</li> <li>▪ LDAR standards are being changed</li> </ul> </li> </ul>	2-24
<p><b>Cost Analysis and Socioeconomic Impacts (pp. 20-24)</b></p> <ul style="list-style-type: none"> <li>○ (P21) The following represents a conservative cost estimate for the implementation of the odor mitigation measures.</li> </ul>	2-25
<ul style="list-style-type: none"> <li>▪ Assumptions:             <ul style="list-style-type: none"> <li>• only three facilities are likely to need an OMP</li> <li>• other (470?) facilities will never need an OMP (and if they do, it's their own fault?)</li> </ul> </li> <li>▪ Elements of OMP             <ul style="list-style-type: none"> <li>• Storage of rods and piping                 <ul style="list-style-type: none"> <li>○ Staff report describes the need to enclose rods and piping while they are standing in the derrick. But at the May 28, 2015, Public Consultation meeting staff said that rods and pipe standing in the derrick during well activity did not constitute "storage", thus would not trigger the enclosure requirement. Clarification is needed, as enclosure of derricks is not practical except at small facilities with limited need to move the derrick structures. Further, staff mentioned tenting and negative air machines as a possible "equivalent method". Tenting and negative air machines would be cost prohibitive, would likely require diesel engines to power the negative air machines at most locations, and, including the additional necessary transportation activity to move the equipment from site to site, would likely create more emissions and potential for nuisance than the activity they are intended to control.</li> </ul> </li> </ul> </li> </ul>	2-26
<ul style="list-style-type: none"> <li>• Odor surveillance             <ul style="list-style-type: none"> <li>○ Staff report says "the facility is required to cease operation until the source of the odor is determined and mitigated". This is not reasonable and should be limited to only the equipment or activity that is determined to be the source of odor.</li> </ul> </li> <li>• LDAR</li> </ul>	2-27

**Response to Comment #2-24**

Although some emission reductions may occur through the implementation of additional odor mitigation measures, the resultant reduction would be difficult to quantify in a manner suitable for inclusion in a State Implementation Plan. As such, the staff report has been revised to refer to quantifiable emission reductions as follows:

[...]Staff does not expect any quantifiable emission reductions or increases because the proposed amendment does not change any VOC standards, and is primarily intended to provide enforceable mechanisms to reduce nuisance odor potential and is otherwise administrative in nature.

**Response to Comment #2-25**

The parameter used in the cost analysis is based on historical complaints over the previous five-year period, thus representing three facilities every five years. The analysis does not presume that other facilities would never be subject to an OMP, only that the rate of inclusion would on average be three every five years.

**Response to Comment #2-26**

See Response to Comment #2-8 and Comment #43.

**Response to Comment #2-27**

The Cost Analysis section of the staff report summarizes the odor surveillance requirement by referring to the detection of odors related to the specific repair or maintenance activity and subsequent ceasing of associated activities under the odor is determined and mitigated. Staff believes the language in the staff report reflects the intent of this comment.

See Response to Comment #2-23.

**Comment Letter #2 (cont.)**

<ul style="list-style-type: none"> <li>○ The rule language and the staff report use different language. The rule language needs to be changed to conform to the language in the staff report, i.e., “would be required when a submitted Specific Cause Analysis report identifies a leaking component as the cause of a Confirmed Odor Event (vs. when identified as a potential source of odor).</li> </ul>	2-28
<ul style="list-style-type: none"> <li>• Centralized monitoring and alarm systems             <ul style="list-style-type: none"> <li>○ Given testimony and staff comments at the May 28, 2015, Public Consultation meeting, it appears that District staff is assuming that systems already in place are generally more robust than is actually the case (e.g., LEL monitors connected centralized monitoring system). The District needs to clearly define what constitutes a satisfactory “centralized monitoring and alarm system” before a final rule is adopted. If this is not done, the estimated costs in the staff report are likely severely understated.</li> </ul> </li> </ul>	2-29
<p><b>Incremental Cost Effectiveness</b></p> <ul style="list-style-type: none"> <li>○ (p24) Staff reviewed the current standards throughout the state and determined that PAR1148.1 represents BARCT for the operation of oil and gas production wells because there are no other more stringent limits available. Although implementation of PAR1148.1 reduces the potential for nuisance odors, it is not anticipated to result in emission reductions and therefore no incremental cost analysis is required under Health and Safety Code § 40920.6.             <ul style="list-style-type: none"> <li>▪ If there are no emission reductions, isn't the incremental cost effectiveness infinite? How is that reasonable?</li> </ul> </li> </ul>	2-30
<p><b>Comparative Analysis</b></p> <ul style="list-style-type: none"> <li>○ (p25) Staff has determined that PAR 1148.1 does not conflict with the following rules because any similar requirements have been directly incorporated or cross-referenced into the rule language.             <ul style="list-style-type: none"> <li>▪ There are conflicting requirements with R1173. Operators of facilities within 1500 feet of a sensitive receptor will need to refer to both rules in order to ensure compliance with all applicable LDAR requirements.</li> </ul> </li> </ul>	2-31
<p><b>Appendix B – Sampling of Complaint History</b></p> <ul style="list-style-type: none"> <li>○ (pB-2) “Also notable is the amount of complaints that are from outside the 1,500-foot radius. However, these complaints have been <del>verified</del> identified as confirmed at the address and <del>traced upwind to</del> the specific oil and gas production facility according to this sample search, although final verification status has not been specifically reviewed.”             <ul style="list-style-type: none"> <li>▪ This statement is unclear. What is the difference between “identified as confirmed” and “final verification status? Were the odors confirmed by the District as originating from the oil and gas facility or not?</li> </ul> </li> </ul>	2-32
<p><b>General Comment</b></p> <ul style="list-style-type: none"> <li>○ Terminology: The terms “push rods”, “lift rods”, “drill rods”, and “lift connector rods” are all used in different places the document, apparently all referring to the same thing, which is assumed to be downhole pump sucker rods in producing oil wells equipped with beam pumping units.</li> </ul>	2-33

### **Response to Comment #2-28**

See Response to Comment #42.

### **Response to Comment #2-29**

See Response to Comment #44 and Comment #2-6.

### **Response to Comment #2-30**

An incremental cost effectiveness calculation is not required.

See also Response to Comment #1-1.

### **Response to Comment #2-31**

Although oil and gas facilities are subject to multiple rules, including Rule 1173, Rule 1176, and Rule 402, the determination of conflict is made based on the any overlapping requirements. The LDAR provisions contained in PAR1148.1 represent greater stringency rather than conflicting requirements. Moreover, the additional LDAR provisions contained within PAR1148.1 are triggered through notification of either a confirmed odor event or an odor mitigation plan, which directs operators to the applicable requirements.

### **Response to Comment #2-32**

The introductory paragraph of Appendix B indicates that a sample of the facility complaint records were reviewed over a five year period encompassing 2010 and 2014. Detailed information, such as the outcome of the investigation including final complaint verification status and details on any violation notices, would require additional individual screening for each complaint and were not included in the Appendix. As such, the data system used to track complaints records each complaint initially by alleged source. As each complaint is investigated, the status may continue to be open or linked to follow-up actions, including NOV investigation, or parallel investigations for non-odor related regulatory compliance. Because the status of a complaint as confirmed is primarily relevant only if six or more complainants are involved for the same event, the level of verification and details associated with a complaint that is not associated with an NOV can vary within the system, and a more thorough review of the individual inspector reports would be required to verify whether a complaint was confirmed for the purpose of the requirements under PAR1148.1.

The reference to complaints in Appendix B therefore refers to those identified in the system as confirmed, but not verified through a review of the more detailed inspector reports and follow-up discussions with the field inspector to determine if the complaint would have been identified as confirmed under the requirements of PAR1148.1.

See also Response to Comment #1-1 and Comment #2-4

**Response to Comment #2-33**

See Response to Comment #43

### Other Comments

In addition to the above comments, staff has received and reviewed numerous comments identifying typographical and grammatical errors, as well as cross-referencing updates. Staff appreciates the input and has updated the proposed rule language as appropriate.



**REFERENCES**

1. SCAQMD, Final Staff Report for Proposed Rule 1148.1 – Oil and Gas Production Wells, Proposed Amended Rule 222 – Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II, 2004.

**APPENDIX A. MONITORING SYSTEMS FOR THE OIL AND GAS  
PRODUCTION INDUSTRY**

### SAMPLING AND MONITORING APPROACHES

SCAQMD uses a variety of sampling and monitoring approaches, including use of canisters to measure hydrocarbons, handheld devices to screen for particulate matter (PM) and hydrogen sulfide (H<sub>2</sub>S), as well as traditional fluid sampling and laboratory analysis for liquids and liquid constituents, to measure both upwind and downwind from a potential source to determine its contribution.

#### Summa Canisters

Evacuated containers are used to collect organics air samples. These canisters are thermally treated containers under a vacuum, and air sample are collected by opening a valve that is later closed after a pre-designated time period. SCAQMD uses Summa canisters, which stainless steel evacuated containers that have been electropolished on the interior to enrich the nickel and chromium surface and makes it more inert than untreated stainless steel.

#### Tedlar Bag Sampling

Tedlar bags are a simple and effective means of collecting gaseous samples when the target pollutant concentration is relatively high, about 10 ppmv. They can be used with or without a Teflon sampling probe. They are often used with evacuated sampling cases, however care is taken to keep the sample out of the sunlight to avoid sample degradation.

#### Handheld Devices

SCAQMD makes use of handheld detectors to screen low level concentrations of hydrogen sulfide (Jerome® Monitor) and particulate matter (DustTrak™).

#### Sampling

Small vials and jars are used to collect field fluid samples for follow-up analysis in the laboratory to determine organic content.

### PAR 1148.1 MONITORING

Currently, oil and gas production facilities rely on a variety of monitoring systems, techniques and equipment to ensure operational efficiency and safety, especially with respect to fire prevention. Some larger facilities may use more advanced systems that not only monitor process parameters such as temperature, pressure and tank levels, but also employ motor controlled valves to remotely manage some parts of the operation.

The proposed amended rule seeks to build upon the existing systems used to monitor safety and operational parameters because many of these parameters can serve as surrogates for potential emissions and accompanying potential odor events. Current operational parameter monitoring in oil and gas production facilities can range from traditional analog technology to high tech video monitoring with pneumatic valve operation and alerting software that provides real-time access through a smartphone or through a centralized operation center or control center. Most facilities are in between these two examples while transitioning from older control boards to the newer generation as facility equipment turns over, is expanded or upgraded. Where identified through a developed and approved Odor Mitigation Plan, the

proposed amendment would focus on integrating feasible and effective measures. The proposed amended rule would focus on monitoring alarm and notification systems.

### **FIXED GAS DETECTION APPLICATIONS**

In the oil, gas, petrochemical refinery and chemical industry, a variety of fixed gas detection methods currently utilized primarily for safety and hazardous environment monitoring. These include:

- Ultraviolet (UV) and Infrared (IR) radiation of hydrocarbon-based fires
- Open Path Infrared (OPIR) for long-range hydrocarbon detection
- Non-dispersive infrared sensor (NDIR) and point IR for toxic and combustible gas monitoring
- Electrochemical (E-chem) toxic gas leak detection, oxygen within confined spaces
- E-chem for oxygen deficiency for confined space entry
- Catalytic bead and NDIR for combustible gas detection

### **REMOTE SENSING TECHNOLOGY FOR FUGITIVE EMISSIONS**

Recent advancements in optical remote sensing technology have made it possible to measure and quantify fugitive VOC emissions from an entire facility or from an operational process unit. This is made possible by mobilizing a Differential Optical Absorption Spectroscopy (DOAS) and Solar Occultation Flux (SOF), and traversing along the fence line of the facility. The data obtained from the analyzer can be graphically displayed with proprietary software.

In September 2013, the SCAQMD Board authorized to contract with FluxSense AB of Sweden for a pilot study to monitor and quantify fugitive VOC emissions from the Tesoro Refinery in Wilmington, CA. The monitoring approach proposed by FluxSense AB included the deployment of SOF and mobile DOAS technologies for monitoring and quantifying emissions including VOC's and other traces gases (e.g. SO<sub>2</sub> and NO<sub>2</sub>). SCAQMD continues to review opportunities to utilize this emerging technology as an additional tool for assessing fugitive emission sources and fugitive emission sources.

### **AIR QUALITY SENSOR PERFORMANCE EVALUATION CENTER (AQ-SPEC)**

SCAQMD's Board approved \$852,000 in July 2014 to fund the creation and first year of operation of the Air Quality Sensor Performance Evaluation Center (AQ-SPEC), which will be located at SCAQMD headquarters in Diamond Bar. The agency also will pursue funding opportunities to sustain the center in future years. This center, representing the nation's first comprehensive evaluation center, will test commercially available, low-cost air quality sensors.

The availability of such sensors, many of which can be purchased on the Internet for a few hundred dollars or less, is rapidly proliferating and many residents and community groups are

now using them to measure pollution levels in their neighborhoods. Data from the devices can be “crowd-sourced” in real time to Internet sites. However, there are no performance standards or testing centers to validate the accuracy of the devices, and preliminary tests have indicated that many of them are not reliable, perform poorly in the field and produce measurements that have little or no correlation to scientifically validated air quality data.

SCAQMD plans to acquire the air quality sensors and begin field and laboratory testing of them this fall. A dedicated website is expected to be launched in the near future and will include testing results and some guidelines and considerations for use of the new technology.

In the field, the sensors will be tested alongside one or more of SCAQMD’s existing air monitoring stations using federally approved methods to gauge overall performance. Sensors demonstrating acceptable performance in the field will then be brought to the AQ-SPEC for more detailed testing.

SCAQMD also will encourage other air quality agencies, universities and national labs to submit any test data and reports they have to help expand the knowledge of available air quality sensors and their performance.

Low-cost air quality sensors have many potential uses from research to personal exposure monitoring to providing education, information and awareness about air quality levels and exposure. Poor or improper data obtained from unreliable sensors could lead to confusion and also jeopardize the successful development, deployment and use of the technology. SCAQMD’s AQ-SPEC program is designed to help provide much-needed information about this emerging technology.

### **Field Testing**

Air quality sensors will be operated side-by-side with more “standardized” air monitoring equipment such as Federal Reference Methods and Federal Equivalent Methods (FRM and FEM, respectively), which are routinely used to measure the ambient concentration of gaseous or particle pollutants for regulatory purposes. The testing will be conducted at one or more of SCAQMD’s existing air monitoring stations (e.g., Rubidoux air monitoring station in Riverside, CA, and the I-710 station, a near-roadway site) to test overall performance.

### **Laboratory Testing**

Sensors that demonstrate an acceptable performance in the field will be brought back to the lab for more detailed testing. A “characterization chamber” (set-up inside the SCAQMD laboratory) will be used to challenge the sensors with known concentrations of different particle and gaseous pollutants (i.e. both individual pollutants and different pollutant mixtures) under different temperature and relative humidity levels.

### Main Goals & Objectives

- Provide guidance & clarity for ever-evolving sensor technology & data interpretation
- Catalyze the successful evolution / use of sensor technology
- Minimize confusion

### Sensor Selection Criteria

- Potential near-term use
- Real- or near-real time (e.g. 1-min)
- Criteria pollutants & air toxics
- Turnkey products first
- Price range: < ~\$2,000 (purchase); > ~\$2,000 (lease/borrow)

### Type of Sensors That Are Being/Will Be Tested

- Electrochemical
- Metal Oxide
- Optical Sensors
- Other

### Pollutants / Variables Measured

- Particle count and particle mass (e.g. PM2.5, PM10)
- Gaseous pollutants (NO<sub>x</sub>, CO, NO, H<sub>2</sub>S, SO<sub>2</sub>, VOCs, others)
- Meteorological parameters (e.g. T and RH)

### Expected Results and Next Steps

- Provide the knowledge necessary to appropriately select, use, and maintain sensors and to correctly interpret their data
- Promote a better and more responsible use of available sensors
- Discover new and more effective ways to interact with local communities
- Provide manufacturers with valuable feedback for improving available sensors and for designing the next generation sensor technology
- Create a “sensor library” to make “low-cost” sensors available to communities, schools, and individuals across California

**APPENDIX B. SAMPLING OF COMPLAINT HISTORY (2010 – 2014) – OIL AND GAS PRODUCTION FACILITIES**

**SAMPLE SURVEY**

A sample of the 473 oil and gas production facilities complaint records were reviewed for the five year period between 2010 and 2014. The facilities were reviewed for the number of complaints received during along with identification of any notices of violation received for Rule 402 - Nuisance, Rule 1176 - VOC Emissions from Wastewater Systems, Rule 1173 - Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants, Rule 203 - Permit to Operate, and Rule 1148.1. Detailed information, such as the outcome of the investigation including final complaint verification status and details on ~~the any~~ violation notices, require additional individual screening for each complaint and ~~has~~ have not been included in this Appendix.

**SAMPLE RESULTS**

Over the reviewed five-year period, there were ~~26,986~~ 25,828 total odor complaints identified and recorded by the SCAQMD. From this total there were ~~353~~ 398 odor complaints that were alleged and identified as confirmed from industrial oil and gas wells facilities. The Table below lists facilities from the sample search, associated with the number of Rule 402 Nuisance notices of violation (NOV), along with other associated rule NOVs.

Facility Name	Location	No. Complaint	402 NOV	1176 NOV	1148.1 NOV	<u>1173 NOV</u>	<u>203 NOV</u>
AllenCo Energy	Los Angeles	<del>258</del> <u>253</u>	<del>3</del> <u>6</u>	<del>4</del> <u>6</u>	<del>4</del> <u>5</u>	<del>2</del> <u>2</u>	<del>4</del> <u>4</u>
Angus Petroleum	Huntington Beach	<del>58</del> <u>109</u>	0	0	0	<u>0</u>	<u>0</u>
Freeport McMoran	Jefferson St.	<del>44</del> <u>15</u>	0	2	0	<u>0</u>	<u>0</u>
Holly Street Inc	Huntington Beach	8	0	0	0	<u>0</u>	<u>0</u>
Freeport McMoran	W. Adams Bl.	<del>7</del> <u>6</u>	0	2	0	<u>0</u>	<u>0</u>
Amtek Construction	Whittier	3	0	0	1	<u>0</u>	<u>0</u>
Oxy USA Inc	Carson	1	0	0	0	<u>0</u>	<u>0</u>
Matrix Oil Corp	Whittier	<del>4</del> <u>2</u>	0	0	0	<u>0</u>	<u>0</u>
Greka Oil & Gas Inc	Placentia	1	0	0	0	<u>0</u>	<u>0</u>

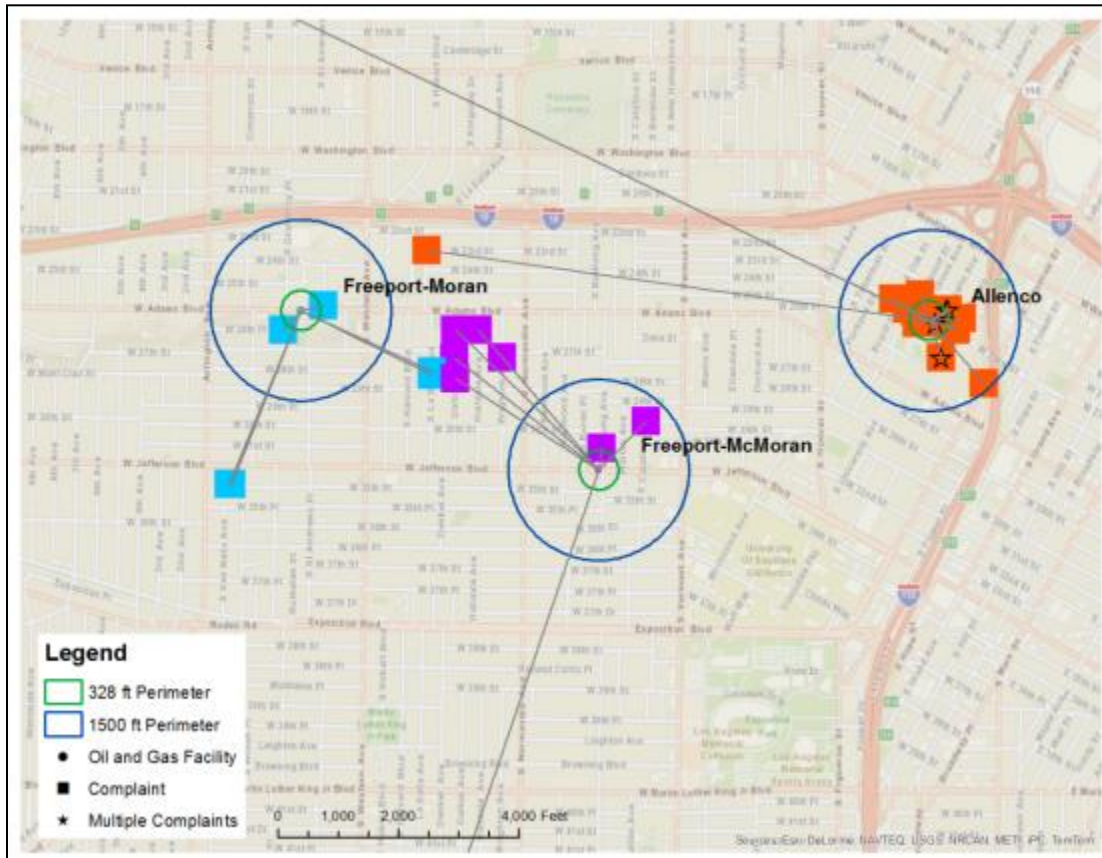
**MAPS**

A graphical map display was used for the facilities from the list above to help illustrate the distance from the facility to each of the complainants. The larger circle represents a sensitive receptor distance of approximately 1,500 feet from the proposed amendment and the smaller

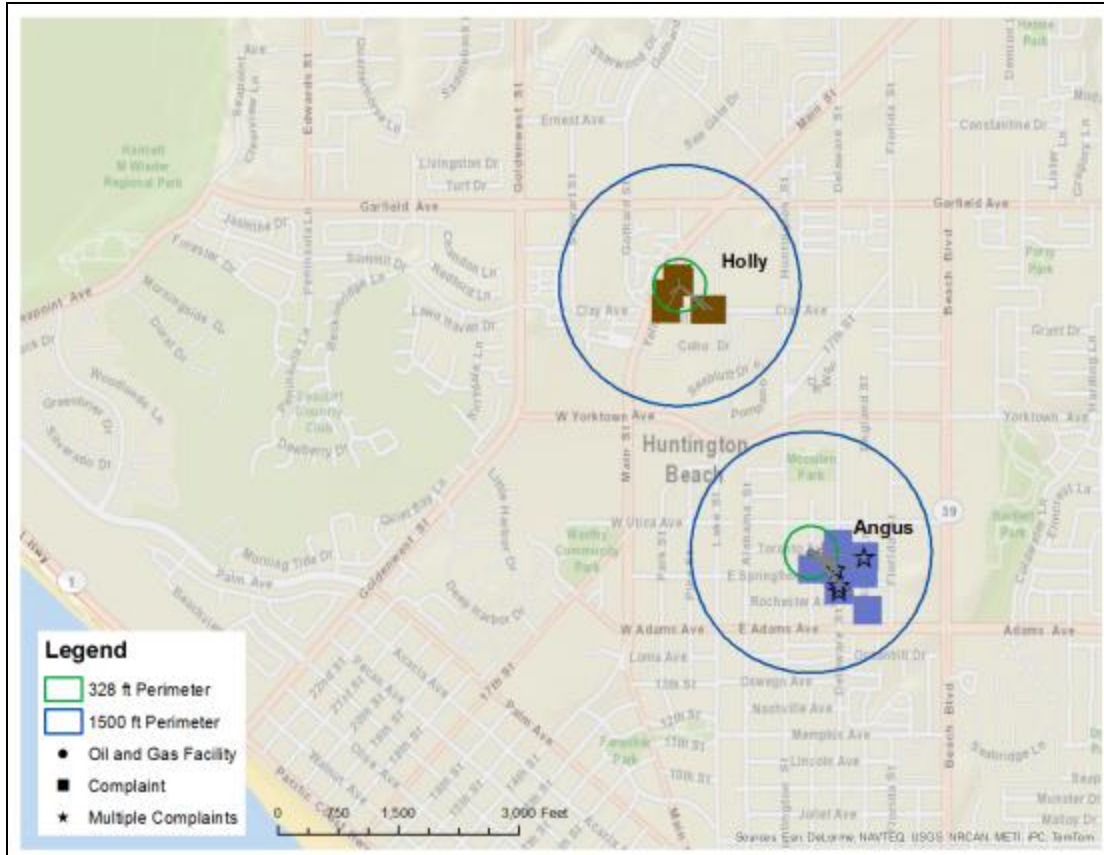


## Final Staff Report

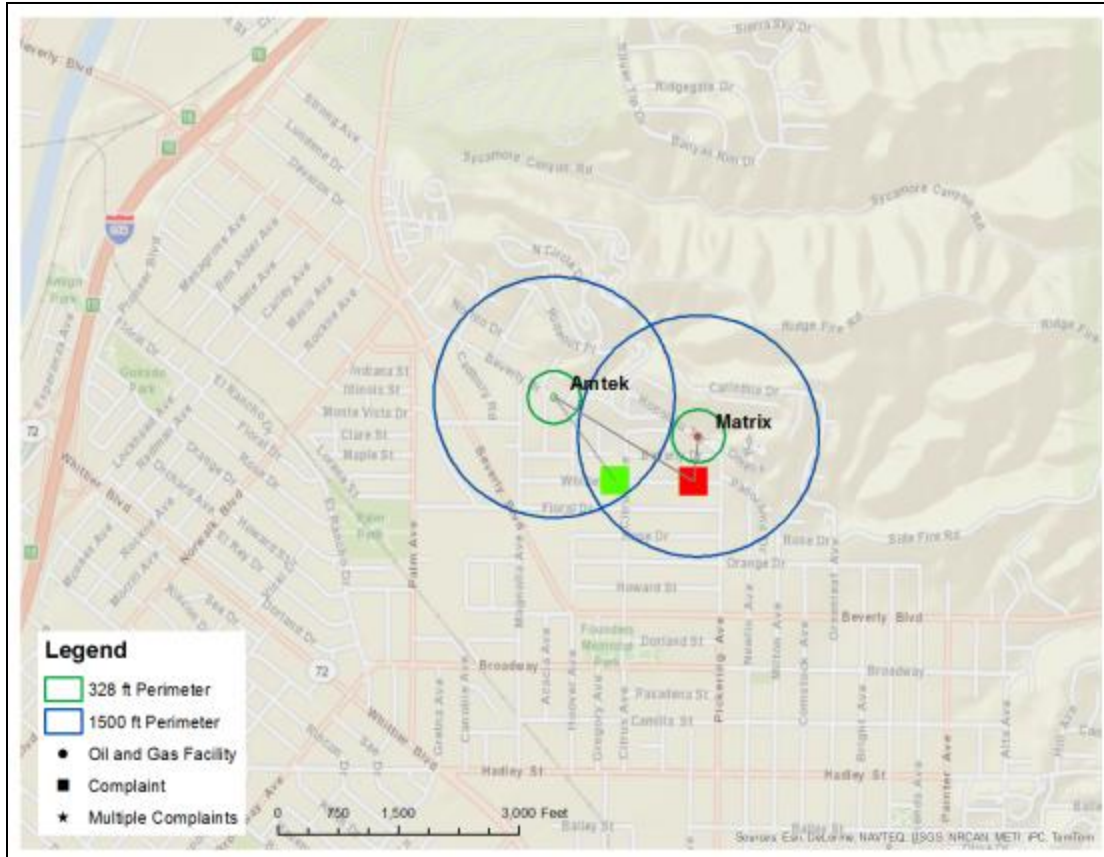
circle is the radius distance of 100m or 328 ft used for sensitive receptors based on the existing rule. The center of the 328ft radius circle is the location of the oil and gas production facility and the square dots within and outside the 1,500 foot radius and 328 foot radius represent logged odor complaints. The stars represent approximate locations of multiple complaints for several alleged events over the five-year period.



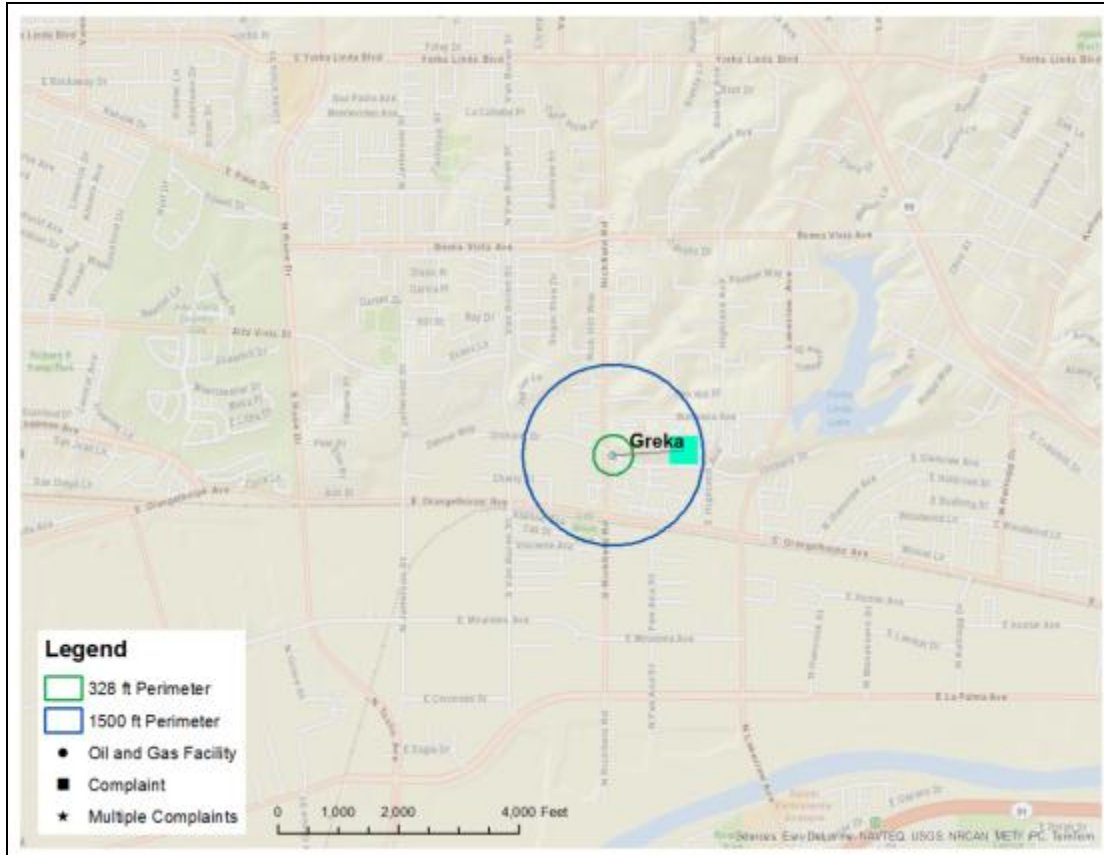
The above graph represents three oil and gas production facilities that are within two square miles, located near the Los Angeles Downtown Area. The grouping of complaint locations are mostly outside the 100 meter or 328 foot radius with the exception of Allenco, which has large grouping along its facility boundary. Also notable is the amount of complaints that are from outside the 1,500-foot radius. However, these complaints have been ~~verified-identified~~ as confirmed at the address and ~~traced upwind to~~ the specific oil and gas production facility according to this sample search, although final verification status has not been specifically reviewed.



Angus Oil, located in the City of Huntington Beach, has complainants that live mostly across the street from the oil and gas production facility. There are several blocks of condominiums and townhomes that border the oil production facility on two sides. The consistent factor is that the oil and gas production facilities are located near residential neighborhoods. The proximity to a densely populated residential neighborhood increases the likelihood of complaints with moderate to low wind movement during particular activities.



The above map identifies two Whittier oil and gas production facilities that are approximately 1,500 feet from each other. These two facilities are also situated in residential neighborhoods, but the population density is not as high as downtown Los Angeles and Huntington Beach, as shown through satellite mapping, and have historically lower odor complaints, if any, during any given year.



Oil and Gas Production facility located in the City of Placentia. The facility is located in a mixed-use and open area, and has only one confirmed odor complaint for a five year period.

### OBSERVATIONS

The following was noted in the review of the complain history and proximity review:

- At farther distances and lower population density, complaint activity decreases.
- Conversely at closer distances and greater population density, complaint activity increases.
- Many complaints are registered within 1,500 feet.
- Some facilities, while located in close proximity to sensitive receptors, do not have a significant nuisance complaint history.

**APPENDIX C. PAR 1148.1 (d)(~~12~~13) – SAMPLE INFORMATION  
SIGNAGE**

### Instructional Information Requirement

PAR1148.1 (d)(~~12~~13) requires owner and operators, 30 days after the rule becomes effective, to post instructional signage for the reporting of odor complaints. The sign must be placed in a conspicuous location and under such conditions as to make it likely to be read or seen and understood by an ordinary individual during both normal operating and non-operating hours, for example near the facility entrance. The sign must contain information that informs the complainant of the facility's name, facility contact information, and instructions to contact the South Coast Air Quality Management District at the 1 800 CUT-SMOG number. The information must be posted in English and Spanish.

The following page is a sample of the type of signage that could be used to meet the requirements of paragraph (d)(~~12~~13) of the proposed amended rule.

# To Report Odors: / Para reportar olores:

## **FACILITY NAME FACILITY PHONE NUMBER**

**Usted puede hacerlo directamente al nombre y número ubicado en la planta o instalación de donde provenga el olor.**

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD)  
1-800-CUT-SMOG OR 1-800-288-7664**

**Llamando a la agencia “South Coast Air Quality Management District o SCAQMD” al número (800) Cut- Smog o (800) 288-7664.**

12”-18”

**CONTACT Us ONLINE: / POR MEDIO DE LA PAGINA EN LÍNEA UBICADA EN:  
[HTTP://WWW3.AQMD.GOV/WEBAPPL/COMPLAINTSYSTEMONLINE/NEWCOMPLAINT.ASPX](http://www3.aqmd.gov/webappl/complaintsystemonline/newcomplaint.aspx)**

## **DOWNLOAD THE SCAQMD SMARTPHONE APP**

**POR MEDIO DE NUESTRAS APLICACIONES “APPS” DE TELÉFONOS INTELIGENTES LAS CUALES ESTÁN DISPONIBLES EN LOS SISTEMAS OPERATIVOS IOS Y ANDROID.**

24”-36”

## ATTACHMENT G

# SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

## Final Environmental Assessment For Proposed Amended Rule 1148.1 – Oil and Gas Production Wells

**June 2015**

**SCAQMD No. 04282015BAR**  
**State Clearinghouse No: 2015041090**

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## PREFACE

This document constitutes the Final Environmental Assessment (EA) for Proposed Amended Rule 1148.1 – Oil and Gas Production Wells. The Draft EA was released for a 30-day public review and comment period from April 29, 2015 to May 28, 2015 which identified the topics of air quality and greenhouse gases, and energy as environmental topic areas that may be adversely affected by the proposed project, but after completing the analysis, were shown to have less than significant impacts.

Two comment letters were received from the public regarding the analysis in the Draft EA. The comment letters and responses to individual comments are included in Appendix C of this document. No comment letters were received that identified other potentially significant adverse impacts from the proposed project.

Subsequent to release of the Draft EA, minor modifications were made to the proposed project and some of the revisions were made in response to verbal and written comments on the project's effects. To facilitate identification, modifications to the document are included as underlined text and text removed from the document is indicated by ~~striketrough~~. Staff has reviewed the modifications to the proposed project and concluded that none of the modifications constitute significant new information or a substantial increase in the severity of an environmental impact, nor provide new information of substantial importance relative to the draft document. In addition, revisions to the proposed project in response to verbal or written comments would not create new, avoidable significant effects. As a result, these minor revisions do not require recirculation of the document pursuant to CEQA Guidelines §15073.5 and §15088.5. Therefore, this document now constitutes the Final EA for the proposed project.

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## **CHAPTER 1**

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### **PROJECT DESCRIPTION**

**Introduction**

**California Environmental Quality Act**

**Project Location**

**Project Background**

**Technology Overview**

**Project Description**

## INTRODUCTION

The California Legislature created the South Coast Air Quality Management District (SCAQMD) in 1977<sup>1</sup> as the agency responsible for developing and enforcing air pollution control rules and regulations in the South Coast Air Basin (Basin) and portions of the Salton Sea Air Basin and Mojave Desert Air Basin referred to herein as the district. By statute, the SCAQMD is required to adopt an air quality management plan (AQMP) demonstrating compliance with all federal and state ambient air quality standards for the district<sup>2</sup>. Furthermore, the SCAQMD must adopt rules and regulations that carry out the AQMP<sup>3</sup>. The 2012 AQMP concluded that major reductions in emissions of particulate matter (PM), oxides of sulfur (SO<sub>x</sub>), volatile organic compound (VOC) and oxides of nitrogen (NO<sub>x</sub>) are necessary to attain the state and national ambient air quality standards for ozone and particulate matter with an aerodynamic diameter of 2.5 microns or less (PM<sub>2.5</sub>). VOC emission reductions, along with NO<sub>x</sub> emission reductions, are necessary because emission reductions of both of these ozone precursors are necessary to meet the ozone standards. VOC emission reductions also contribute to achieving the PM<sub>2.5</sub> ambient air quality standards.

Although health-based standards have not been established specifically for VOCs, health effects can occur from exposures to high concentrations of VOCs because of interference with oxygen uptake. In general, ambient VOC concentrations in the atmosphere are suspected to cause coughing, sneezing, headaches, weakness, laryngitis, and bronchitis, even at low concentrations. Some hydrocarbon components classified as VOC emissions are thought or known to be toxic air contaminants (TACs). With stationary and mobile sources being the major producers of VOCs, which contribute to ozone formation, reducing the quantity of VOCs in the district has been an on-going effort by the SCAQMD.

Rule 1148.1 – Oil and Gas Production Wells, was adopted in 2004 to implement portions of the 2003 AQMP Control Measure FUG-05 – Emission Reductions from Fugitive Emission Sources, to reduce VOC emissions from well cellars as well as from sources of untreated produced gas located at oil and gas production facilities. Rule 1148.1 also requires a visual inspection and maintenance program for controlling untreated produced gas and contains additional regulatory considerations for sources located within 100 meters of sensitive receptors. However, due to an increased awareness of oil and gas production wells by the community, leading to multiple complaints and public comments requesting more proactive and preventative measures, SCAQMD staff has revisited the requirements in Rule 1148.1 to see what, if any, improvements can be made to the rule in order to minimize air quality and odor impacts to local residents and sensitive receptors that are often located nearby from ongoing operations that do not include drilling or well stimulation.

To prevent public odor nuisance and possible detriment to public health caused by exposure to VOC, TAC, and total organic compound (TOC) emissions from the operation and maintenance of oil and gas production facilities, SCAQMD staff is proposing amendments to Rule 1148.1 that would: 1) increase the minimum proximity distance to sensitive receptors (e.g., from 100 meters

<sup>1</sup> The Lewis-Presley Air Quality Management Act, 1976 Cal. Stats., ch 324 (codified at Health and Safety Code, §§40400-40540).

<sup>2</sup> Health and Safety Code, §40460 (a).

<sup>3</sup> Health and Safety Code, §40440 (a).

to 1,500 feet) that would trigger additional emission and odor preventative measures; 2) require the use of odor mitigation best practices for operation and maintenance of oil and gas production facilities; 3) require specific cause analysis and reporting for confirmed odor events and confirmed oil deposition events; 4) require Odor Mitigation Plans for facilities with continuing odor issues; and, 5) make administrative changes by removing obsolete rule language and making minor revisions to promote clarity, consistency, and enforceability throughout the rule.

## CALIFORNIA ENVIRONMENTAL QUALITY ACT

Because the proposed project is to be carried out by a public agency, it is a “project” as defined by the California Environmental Quality Act (CEQA). SCAQMD is the lead agency for the proposed project and has prepared this Final draft Environmental Assessment (EA) with no significant adverse impacts pursuant to its Certified Regulatory Program. California Public Resources Code §21080.5 allows public agencies with regulatory programs to prepare a plan or other written document in lieu of an environmental impact report once the Secretary of the Resources Agency has certified the regulatory program. The SCAQMD's regulatory program was certified by the Secretary of the Resources Agency on March 1, 1989, and is codified as SCAQMD Rule 110 - Rule Adoption Procedures to Assure Protection and Enhancement of the Environment.

CEQA and Rule 110 require that potential adverse environmental impacts of proposed projects be evaluated and that feasible methods to reduce or avoid significant adverse environmental impacts of these projects be identified. To fulfill the purpose and intent of CEQA and pursuant to Rule 110 (the rule which implements the SCAQMD's certified regulatory program), SCAQMD has prepared this Final Draft EA to evaluate potential adverse environmental impacts associated with implementing the proposed project. The Final Draft EA is a public disclosure document intended to: 1) provide the lead agency, responsible agencies, decision makers and the general public with information on the environmental effects of the proposed project; and, 2) be used as a tool by decision makers to facilitate decision making on the proposed project. This Final Draft EA includes an Environmental Checklist and project description. The Environmental Checklist provides a standard evaluation tool to identify a project's adverse environmental impacts.

SCAQMD's review of the proposed project shows that PAR 1148.1 would not have a significant adverse effect on the environment. Because PAR 1148.1 will have no statewide, regional or areawide significance, no CEQA scoping meeting was required to be held for the proposed project pursuant to Public Resources Code §21083.9 (a)(2). Further, pursuant to CEQA Guidelines §15252, since no significant adverse impacts were identified, no alternatives or mitigation measures are required to be included in this Final Draft EA. The analysis in Chapter 2 supports the conclusion of no significant adverse environmental impacts. The Draft EA was released for a 30-day public review and comment period from April 29, 2015 to May 28, 2015. Written Two comment letters on the environmental analysis in the Draft EA were received and will be were evaluated, and Responses to all of the comments received have will been prepared. The comment letters and the responses are included in Appendix C of this Final EA.

Subsequent to release of the Draft EA, minor modifications were made to the proposed project and some of the revisions were made in response to verbal and written comments on the project's

effects. Staff has reviewed the modifications to the proposed project and concluded that none of the modifications constitute significant new information or a substantial increase in the severity of an environmental impact, nor provide new information of substantial importance relative to the draft document. In addition, revisions to the proposed project in response to verbal or written comments would not create new, avoidable significant effects. As a result, these minor revisions do not require recirculation of the document pursuant to CEQA Guidelines §15073.5 and §15088.5. Prior to making a decision on the proposed amendments to Rule 1148.1, the SCAQMD Governing Board must review and adopt the Final EA as providing adequate information on the potential adverse environmental impacts of the proposed amendments to Rule 1148.1.

## **PROJECT LOCATION**

The proposed amendments to Rule 1148.1 would affect all on-shore oil producing wells, wellheads, well cellars, and untreated produced gas operations within the SCAQMD's jurisdiction, unless specifically exempt. The SCAQMD has jurisdiction over an area of approximately 10,743 square miles, consisting of the four-county South Coast Air Basin (Basin) (Orange County and the non-desert portions of Los Angeles, Riverside and San Bernardino counties), and the Riverside County portions of the Salton Sea Air Basin (SSAB) and Mojave Desert Air Basin (MDAB). The Basin, which is a subarea of the SCAQMD's jurisdiction, is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto mountains to the north and east. It includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The Riverside County portion of the SSAB is bounded by the San Jacinto Mountains in the west and spans eastward up to the Palo Verde Valley. The federal nonattainment area (known as the Coachella Valley Planning Area) is a subregion of Riverside County and the SSAB that is bounded by the San Jacinto Mountains to the west and the eastern boundary of the Coachella Valley to the east (see Figure 1-1).



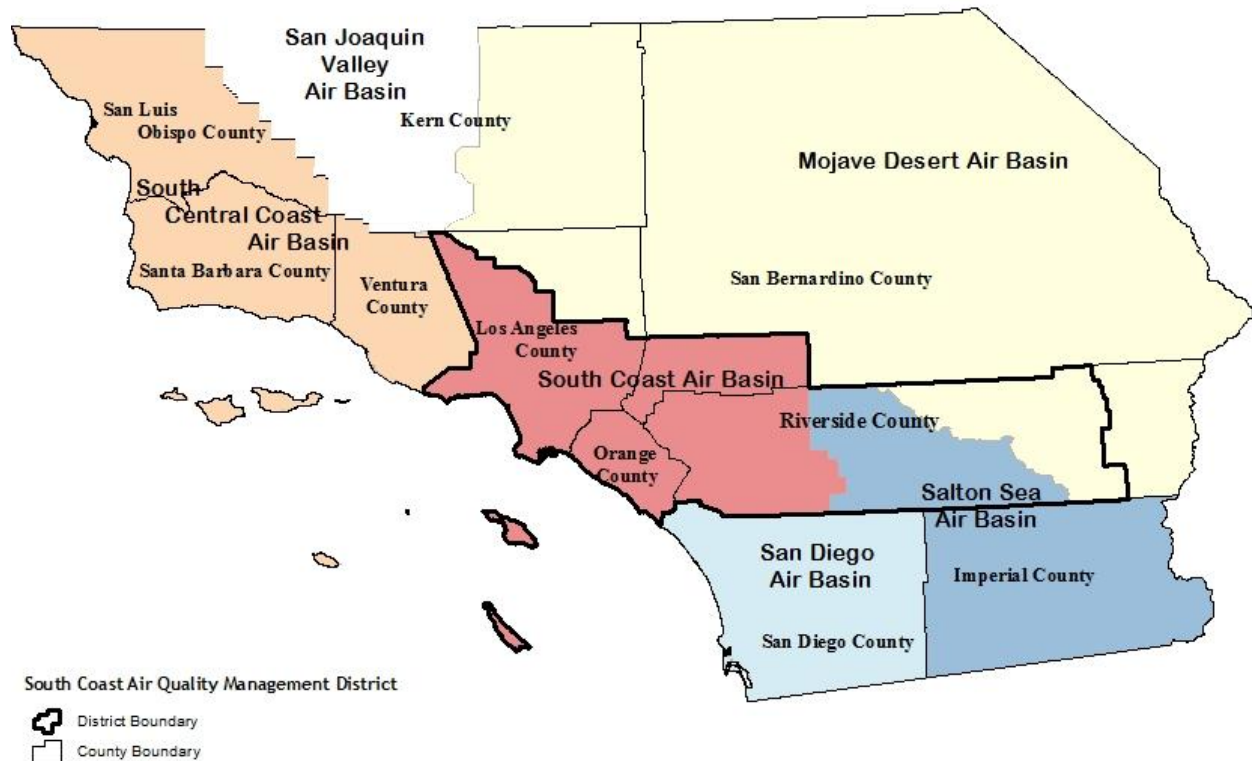


Figure 1-1: Southern California Air Basins

## PROJECT BACKGROUND

The California Department of Conservation, Division of Oil, Gas and Geothermal Resources (DOGGR) oversees the maintenance of well cellars at oil and gas production operations throughout California. The Public Resources Code (PRC), Division 3, Chapters One through Four, govern the regulatory functions of DOGGR. DOGGR is responsible for supervising oil, gas and geothermal well drilling, operation, maintenance, plugging and abandonment operations to prevent the damage to life, health, property and natural resources by enforcing the requirements in Public Resources Code §§3300 - 3314 and §§3350 - 3353 which prohibit persons from willfully allowing natural gas from land containing oil or gas to escape into the atmosphere by:

- Preventing damage to underground oil, gas and geothermal deposits;
- Preventing damage to underground and surface waters suitable for irrigation or domestic use;
- Preventing other surface environmental damage, including subsidence;
- Preventing conditions that may be hazardous to life or health; and
- Encouraging the wise development of oil, gas and geothermal resources through good conservation and engineering practices.

DOGGR’s responsibilities also entail permitting and testing wells; conducting safety inspections; overseeing production and injection projects; conducting inspections of environmental leases; testing idle-wells; inspecting oilfield tanks, pipelines, and sumps; plugging hazardous and orphan-wells and overseeing abandonment contracts; and monitoring subsidence.

Rule 1148.1 was adopted in 2004 to regulate VOC emissions from wellheads, well cellars and untreated produced gas at oil and gas production operations. Rule 1148.1 currently implements all feasible control measures in accordance with the 2003 AQMP Control Measure FUG-05 – Emission Reductions from Fugitive Emission Sources and California Health and Safety Code §40920.5. Rule 1148.1 works in concert with the state regulations.

Operators of oil wells and well cellars are not required to obtain SCAQMD permits and not all oil wells utilize well cellars. However, facilities with equipment such as American Petroleum Institute (API) oil-water separators, tanks, vessels, heaters, boilers, internal combustion engines and clean-out sumps (part of the dehydration or wastewater system permit unit), and “control” equipment such as heaters, flares, gas treatment equipment, internal combustion engines and boilers are required to have SCAQMD permits. In addition, SCAQMD Rule 222 - Filing Requirements For Specific Emission Sources Not Requiring A Written Permit Pursuant To Regulation II, includes oil production well groups, applies to no more than four well pumps located at a facility subject to Rule 1148.1 at which crude petroleum production and handling are conducted, as defined in the Standard Industrial Classification Manual as Industry No. 1311, Crude Petroleum and Natural Gas. To date, there are 473 oil and gas production facilities operating within SCAQMD’s jurisdiction that are either currently subject to Rule 1148.1 or registered via Rule 222.

In addition to Rule 1148.1, there are other SCAQMD rules that may apply to oil and gas production facilities. However, there are only four SCAQMD rules that specifically regulate oil and gas production activities at these facilities, as follows:

Rule 1148 - Thermally Enhanced Oil Recovery Wells

Rule 1148 was adopted in 1982 and has not been amended since its adoption. Rule 1148 applies to thermally enhanced oil recovery wells, and limits VOC emissions to 4.5 pounds per day or less per well, regardless of whether each well is connected to a vapor control system.

Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers

Rule 1148.2 was adopted in 2013 to gather air-quality related information on oil and gas well pre-production activities, such as hydraulic fracturing and other well production stimulation operations. Rule 1148.2 contains reporting requirements for operators and chemical suppliers of onshore oil and gas wells undergoing rework or completion activities.

Rule 1173 - Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants

Rule 1173 was adopted in 1989 and last amended in 2009. The purpose of the rule is to reduce VOC leaks from components such as valves, fittings, pumps, compressors, pressure relief devices, diaphragms, hatches, sight glasses and meters at refineries, chemical plants, lubricating

oil and grease re-refiners, marine terminals, oil and gas production fields, natural gas processing plants, and pipeline transfer stations.

#### Rule 1176 - Sumps and Wastewater Separators

Rule 1176 was adopted in November 1989 and last amended in September 1996. Rule 1176 applies to wastewater systems and associated control equipment located at petroleum refineries, onshore oil production fields, off-shore oil production platforms, chemical plants and industrial facilities. Sumps and wastewater separators are required to be covered with either a floating cover equipped with seals or a fixed cover, equipped with a closed vent system vented to an air pollution control system. Currently, Rule 1176 subparagraph (i)(5)(H) exempts well cellars used in emergencies at oil production fields provided that clean-up procedures are implemented within 24 hours after each emergency occurrence and completed within ten calendar days.

Since oil field production facilities are prevalent throughout the SCAQMD's jurisdiction and many are situated within close proximity to sensitive receptors, such as residential communities and schools with very little buffer zones between operations and receptors, SCAQMD staff has proceeded with rule amendment efforts to further protect the public from odors and nuisance from existing and future urban oil field production facilities beyond the existing regulatory setting. As part of the rule amendment efforts, SCAQMD staff assessed the current odor and complaint reporting system. The SCAQMD currently manages complaints via the 1-800-CUT-SMOG telephone hotline, via the on-line complaint system (<http://www.aqmd.gov/contact/complaints>), and through implementation of Rule 402 – Nuisance. Rule 402 prohibits any discharge of any material that may cause injury, detriment, nuisance, annoyance or discomfort to any considerable number of persons, with a large number of complaints typically associated with disagreeable odors. Currently, in order to pursue an enforcement action under Rule 402, an odor must be verified at the complainant location, that same odor traced upwind to the source, and the source identified as either the boundary of a facility or a device, equipment or unit. Once the odor is traced to either a facility or source, the complaint would become confirmed. Finally, multiple confirmed complaints called within the same timeframe would qualify for issuance of a Notice of Violation (NOV). For more frequent odor NOV's, conditions, through an Order of Abatement, may be issued to address ongoing odor issues resulting from a facility.

Figure 1-2 contains an overview of SCAQMD's complaint handling process where typically an NOV may be issued if there are six or more confirmed complaints. Where less than an NOV threshold is established or observed but odors can be traced to an activity or equipment, the inspector reviews all applicable rules and permit conditions to determine if the detected odors are attributable to potential non-compliance. In the event that a Rule 402 NOV is issued, the source would be subject to a more thorough and lengthy legal investigation and violation settlement.

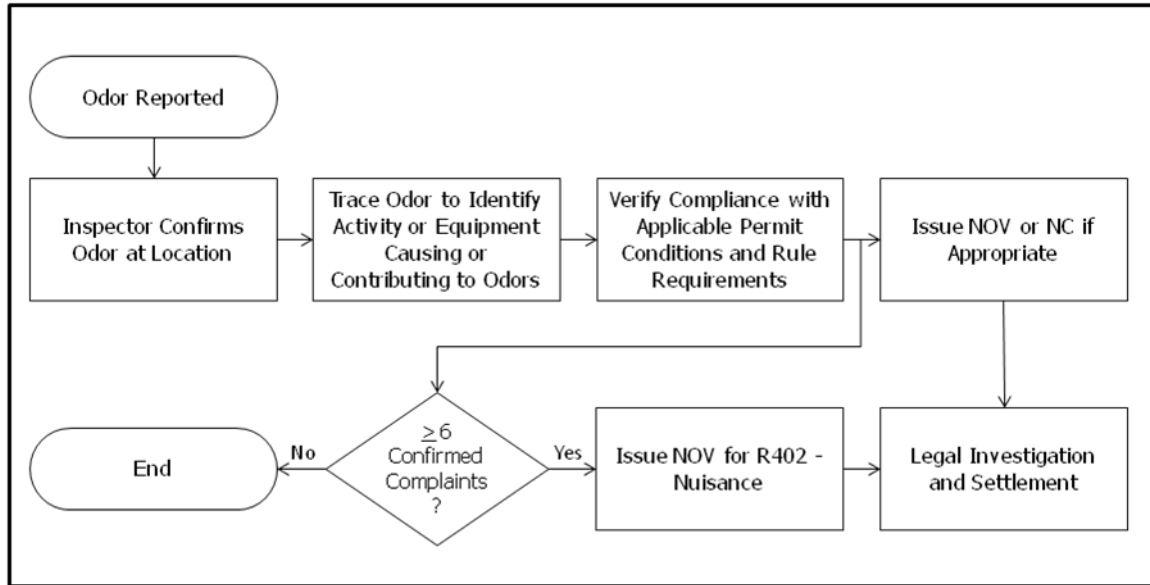


Figure 1-2: Typical SCAQMD Complaint Handling Process

It is not uncommon for complaints to be unconfirmed, or for an odor causing event to fall short of the multiple complaint threshold for issuance of a Rule 402 NOV. Odors may be caused by infrequent or brief activities and are fleeting. Although an inspector responding to a complaint typically communicates a summary of the initial field inspection, in some cases the complainant may have chosen to be anonymous, or the complaint call or email may have occurred after hours or late in the evening. In other cases, especially when the complaint or facility is not confirmed, the complainant may be left with the impression that no action has been or can be taken to address their complaint. Finally, even when an NOV is issued, the subsequent legal investigation process, as indicated in Figure 1-2, may not address the immediate informational needs of a complainant, who may continue to experience exposure to objectionable odors due to another facility that may also be causing a separate odor event. A facility that takes specific correction action to address the complaint driven odor causing activity or operation may similarly not be given credit for their actions should similar odors be detected from another facility or from a separate odor causing event.

## TECHNOLOGY OVERVIEW

Oil and gas production involves bringing crude oil from the subsurface to the surface and preparing it for shipment to a refinery. The process of moving oil and gas from underground reservoirs to aboveground storage is described as a “pipeline process” since oil and gas in its natural state uses natural pressure or mechanical forces to move the oil and gas through miles of pipeline to the wellhead and is then transported by more piping to storage. In the life of an oil well, there are four main phases which dictate the type of equipment to be used and the work practices and maintenance procedures that will be implemented: 1) exploration; 2) well development; 3) production; and, 4) well abandonment. In addition, there are ancillary procedures and equipment that are used across all phases of oil and gas production, including overall facility and equipment maintenance and spill containment and spill response.

During production, sources of fugitive emissions from oil and gas operations are well cellars and wellheads, and separation and treatment activities. For example, fugitive emissions may occur at valves, flanges and threaded connections on the wellhead. Also, well cellars and wellheads are particularly susceptible to liquid leaks especially where maintenance is poor or when large valves are opened and then closed, which often produces a noticeable amount of liquids including hydrocarbons. If the liquid is allowed to stand over an extended period, VOC emissions and related odors may be released to the atmosphere, and may promote odor nuisance complaints from the local community. To reduce fugitive emissions, sources are required to have a routine program of inspection and equipment repair in order to detect and eliminate conditions that may result in a breakdown. Lastly, workover rigs used in maintenance activities rely on internal combustion engines that generate combustion emissions.

Oil and gas operations have been historically regulated and permitted by the California Division of Oil, Gas and Geothermal Resources (DOGGR). Rule 1148.1 applies principally to the production phase, whereas Rule 1148.2 - Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers, applies to the exploration, well development and well rework phases. DOGGR continues to regulate site abandonment activities. The emission-related aspects of ancillary activities such as maintenance and spill containment and spill response are regulated by Rule 1148.1. Figure 1-3 outlines the overall oil and gas well lifecycle and the associated regulatory applicability with respect to activities covered under Rule 1148.1 and Rule 1148.2.

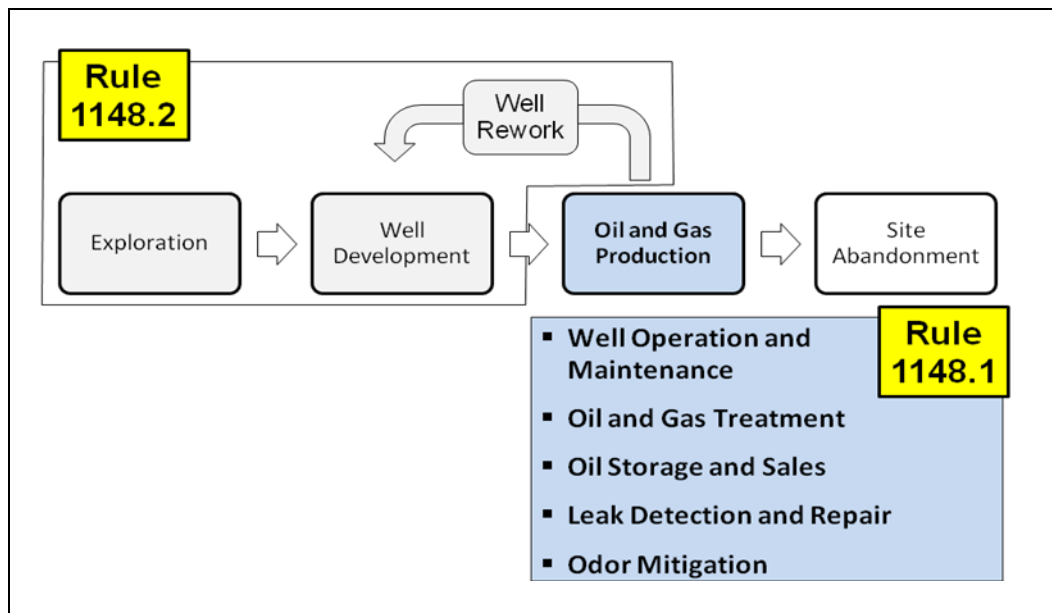


Figure 1-3: Typical Oil and Gas Production Facility Processes and SCAQMD Rule Applicability

### Exploration

The drilling of exploratory wells is subject to Rule 1148.2. When oil deposits are discovered as part of drilling an exploratory well, a crude oil reservoir can contain a mixture of water, as well as oil and gas in the small pore spaces in the reservoir rock. Initially, the reservoir holds these fluids under considerable pressure, caused by the hydrostatic pressure of the groundwater. At this pressure, a large part of the gas is dissolved in the oil. These two fluids, the initial water and

the gas in solution, combine to provide the driving force for moving the oil into the well where it is pushed by the underlying pressure.

Exploratory wells are drilled into unknown geological formations in search of locating a new source of oil or natural gas. This type of well represents a risk for the company conducting the drilling due to the high cost and the uncertainty as to how much oil or natural gas the formation might contain. An exploratory well may turn out to be a profitable new source of fossil fuel, or it may contain noncommercial quantities of fuel that are not worth extracting. In the latter case, the exploratory well may be plugged and abandoned.

### Well Development

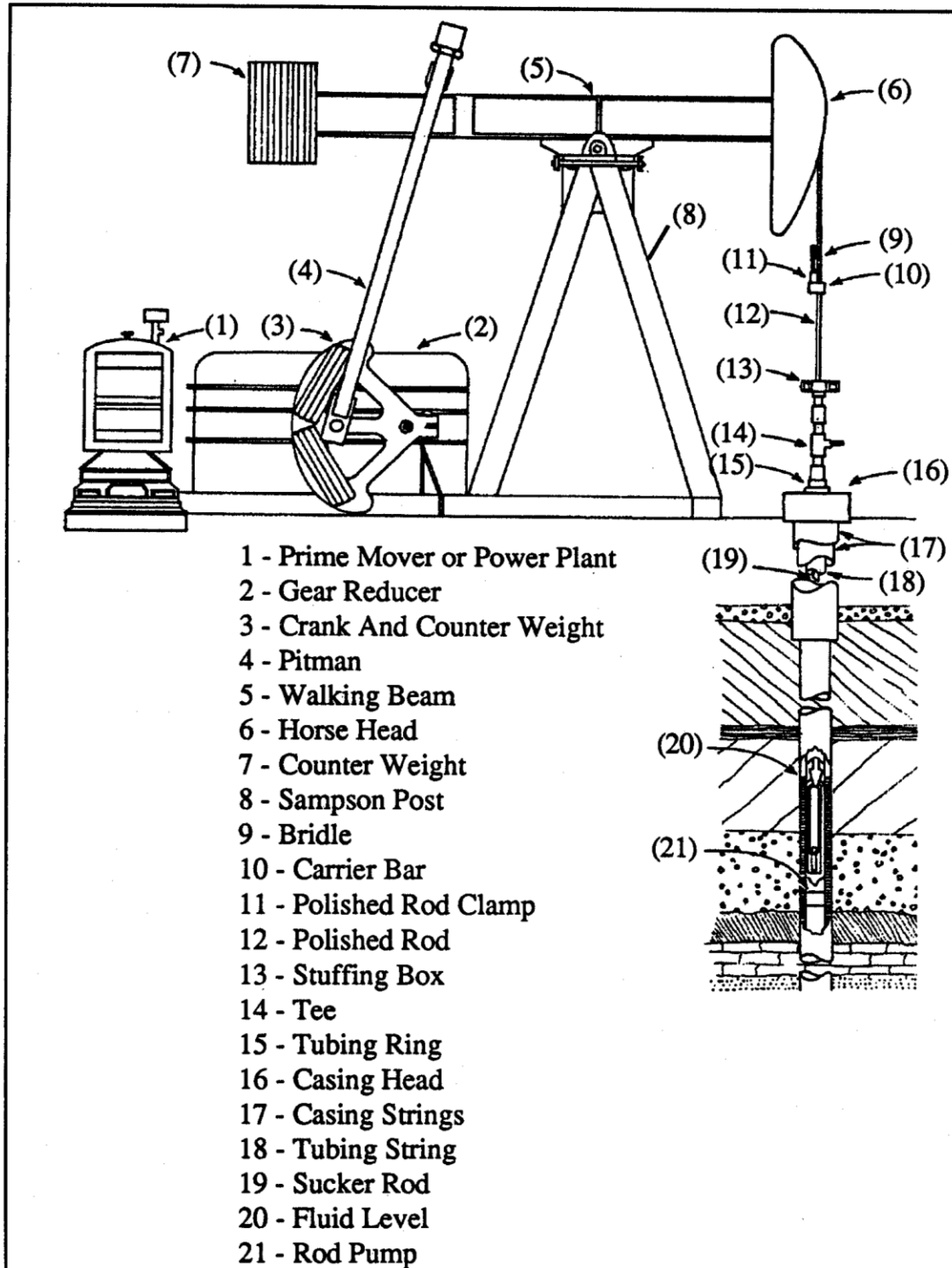
The drilling of development wells is also subject to Rule 1148.2. Development wells are typically drilled within an area that has already proven to be productive. Once oil or gas is discovered in a commercially viable quantity, development wells are drilled to continue to recover as much of the oil or gas as possible. There are also service wells which are drilled for injecting liquids or gases into an underground formation in order to increase the pressure and force the oil toward the producing wells. Service wells also include wells drilled for the underground disposal of salt water produced with the oil and gas. The drilling of service wells is considered to be part of the well development phase.

### Production

After completion of the drilling phases, the process enters the production phase which is regulated by Rule 1148.1. The first step of the production phase is to construct an oil well which is essentially a pipeline that reaches from the top of the ground to the oil-producing formation underground. It is through this pipe that oil is brought to the surface. The pipeline is a series of joints of a special kind of pipe (casing) screwed together to form a continuous tube or string for the oil and gas to flow through (see Figure 1-4). Sometimes in drilling a well, more than one commercially productive formation is found. In such cases a separate tubing string is run inside the casing for each productive formation. Production from the separate formations is directed through the proper tubing strings and is isolated from the others by packing that seals the annular space between the tubing strings and casing. These are known as multiple completion wells.

The production stage is the most important stage of a well's life, when the oil and gas are produced. By this time, the rigs used to drill and complete the well have moved off of the wellbore, and the top is usually outfitted with a collection of valves called a “Christmas tree” or production tree. These valves regulate pressures, control flows, and allow access to the wellbore in case further completion work is needed. From the outlet valve of the production tree, the flow can be connected to a distribution network of pipelines and tanks to supply the product to refineries, natural gas compressor stations, or oil export terminals.

As long as the pressure in the reservoir remains high enough, the production tree is all that is required to produce the well. If the pressure depletes and it is considered economically viable, an artificial lift method can be employed to withdraw the remaining product from the reserve (see Figure 1-4). Currently there are four common methods of artificial lift used in the industry today: 1) beam pumping; 2) submersible pumping; 3) gas lift; and, 4) hydraulic pumping.



Source: Figure 301.4, Oil Field Production, Compliance Assistance Program, California Air Resources Board, Compliance Division, July 1992.

Figure 1-4: Artificial Lift Pumping Unit

The artificial lift method of beam pumping is when the pump is designed to be inserted inside the tubing of a well in order to gather fluids from beneath the surface and lift them to the surface. The most important components are the barrel, valves (traveling and fixed) and the piston. The pump is connected to the pumping unit at the surface by a string of sucker rods. Sucker rods are stroked up and down the tubing, activating the pump at the bottom. At the surface, a large mechanical device called the beam pumping unit is attached. Depending on the size of the pump, it generally produces from five to 40 liters of liquid per stroke. Often, the recovered liquid is an emulsion of crude oil and water. One of the advantages of beam pumping is high efficiency; however, it is limited to relatively low production volumes (e.g., less than 1,000 barrels per day (bpd)).

Submersible pumping is when an electrical motor is attached to a pump at the end of the tubing string. The electrical motor turns a centrifugal pump which forces oil from the bottom of the well, up through the inside of the tubing, and out at the surface. The electricity is supplied through an electric cable attached to the side of the tubing and connected to the electric motor. While submersible pumping has high volume and depth capacity and can produce over 1,000 bpd, it has poor ability to pump sand.

Another type of artificial lift is gas lift, which involve a series of devices called gas lift valves that are inserted into the sides of the tubing. The gas is injected into the well through the tubing casing annulus and enters the tubing through the gas lift mandrels and gas lift valves. The fluid in the tubing is made lighter by the gas, and as a result, the mixture is pushed to the surface by the reservoir pressure. The advantage of using gas lift equipment is that the process closely resembles the natural flow process and basically operates as an enhancement or extension of that process. The only major requirement for utilizing gas lift is the need for an available and economical supply of pressurized gas. The draw backs in using this system are high initial capital cost, high level of maintenance and complex operation.

The last artificial lift method, hydraulic pumping, is when high pressure oils are pumped into the well through the tubing string. At the bottom of the well, the pressurized oil enters a mechanical device, causing it to reciprocate. This mechanical device activates a pump which lifts the oil from the producing formation, together with expended powered oil to the surface. The system consists of a surface power fluid system, a prime mover, a surface pump, and a down hole jet or pump. Power fluid from the surface actuates the engine, which in turn drives the pump causing power fluid to return to the surface with the produced oil. The advantages of hydraulic pumping are that there are no moving parts and high volume capability. The downsides are the high initial capital cost and the difficulty of operation.

#### Site Abandonment

Site abandonment activities are regulated by DOGGR. Once an oil and gas reservoir at a production well is depleted, the well is abandoned and the site is cleaned up. As part of this process, the depleted reservoir hole is plugged with cement to protect all underground strata by preventing any flow or leakage at the surface and protecting the water zone, in accordance with California Code of Regulations (CCR), Subchapter 4 and section 1920.1. Any equipment that is salvageable is removed; pits used in the operation are filled in and the site is re-graded. Wherever practical, the ground is replanted with grass or other kinds of vegetation and sometimes home building sites are constructed.



### Maintenance

Maintenance is necessary and required to ensure the smooth and safe operation of oil and gas operations and to minimize emissions during all phases of oil well operations. General maintenance includes the repair or replacement of pull rods or well casings using workover rigs, as well as the inspection and repair of pumps and other equipment used in production.

### Spill Containment and Spill Response

Oil and gas production facilities utilize various forms of spill control and countermeasures to address the handling of hazardous materials. Primary containment consists of a permanent structure that holds the hazardous material (oil), such as tanks and piping. In many cases well cellars are used to provide secondary containment. On-shore oil and gas production facilities are also subject to federal requirements for spill control under 40 CFR part 112.

### Well Cellars and Wellheads

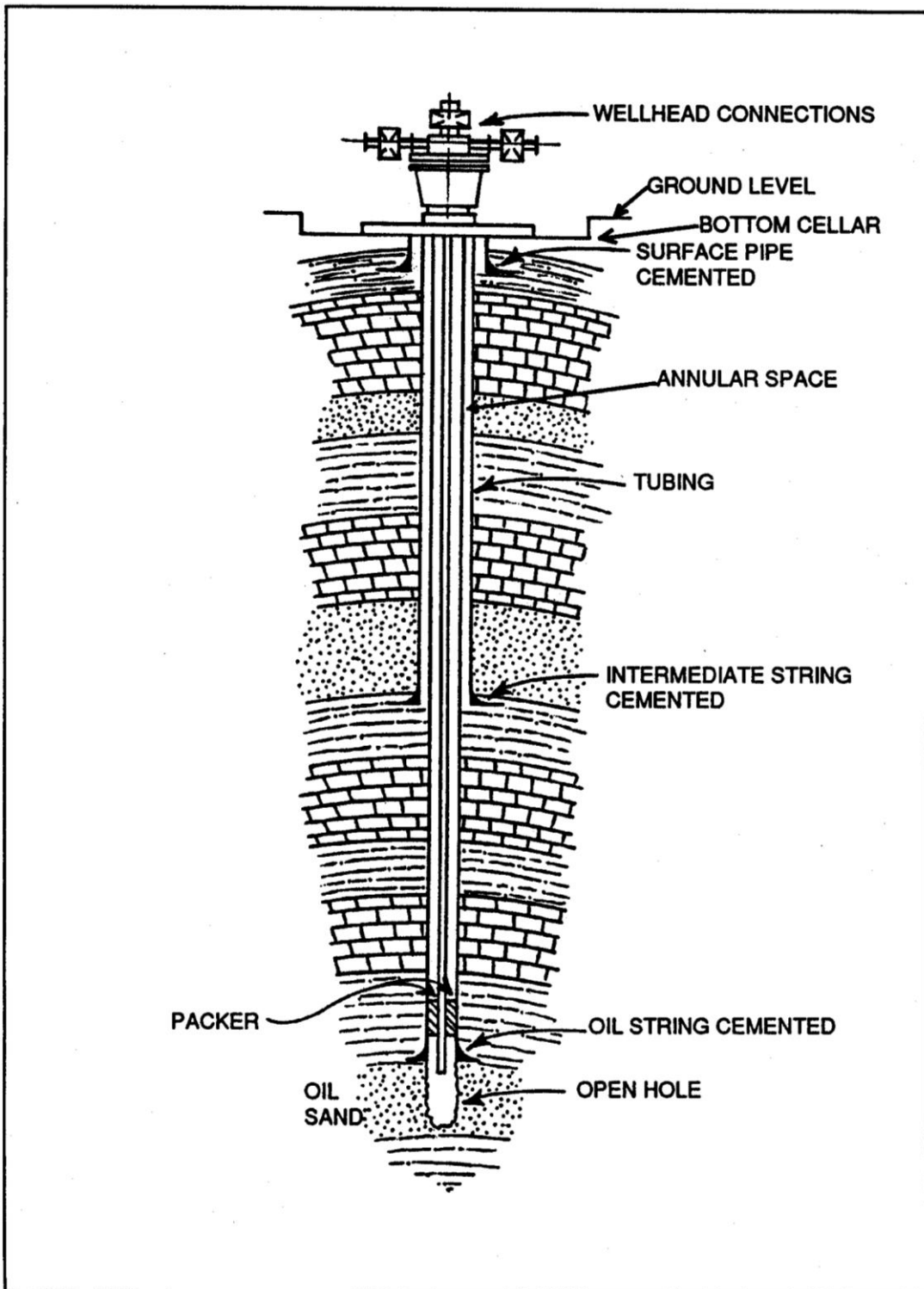
In most cases, the wellhead resides in or above the well cellar which is a small subsurface containment basin used to capture any leaking liquid from oil and gas extraction or maintenance and workover of the well or wellhead (see Figure 1-5).

Well cellars can be lined or unlined and there can be one or more wellheads allocated to a well cellar. On average, a well cellar has approximate dimensions of six feet by six feet with a depth of between five feet and eight feet. In the absence of containers used to catch discarded liquid (crude/water) produced during sampling and maintenance at the wellhead, there is an accumulation of crude oil that falls to the bottom of the well cellar. In order to provide access to wellheads for maintenance and sampling, well cellars are uncovered and become sources of VOC emissions and associated odors when crude oil is collected in this containment.

### Separation and Treatment

After the well fluids and gas reach the wellhead they are transferred to a treatment plant. At the treatment plant the crude oil, natural gas, produced water and solid contaminants are separated and treated. A treatment plant may be simple or complex and can take many different forms depending on treatment needs. Typically, the treatment plant includes a well flow-line manifold in addition to separators, free water knockout vessels, heaters (if crude is heavy), heater-treaters, wash tanks, stock tanks, wastewater separators or oil/water separators, sumps, pits, ponds and a vapor recovery unit.

The well fluids (oil/water) and gas mixture flows to a well manifold that connects with each well in the field. From the manifold, the mixture is directed to either a test or a production separator, which separates and measures the three phases and is used to determine the production of each well. Under normal conditions, the mixture flows to a production separator or free water knockout where gas is separated from the mixture. From there, the oil/water stream flows to a free water knockout vessel, a heater treater, a wash tank and an oil/water separation vessel where water is removed from the oil. After it is determined that there is a sufficient reduction of water content, the oil flows to an oil storage or stock tank. Upon sale, the oil flows through Lease Automated Custody Transfer (LACT) units for metering.



Source: Figure 301.2, Oil Field Production, Compliance Assistance Program CARB Compliance Division, July 1992

Figure 1-5: A Typical Well

Gases removed from the oil during treatment may be treated and then either: 1) sold to a utility; 2) used as fuel by the operator; 3) re-injected into the reservoir for pressure maintenance; or, 4) vented to the atmosphere, a practice largely eliminated by the requirements of Rule 1148.1 which provides for the use of air pollution control devices in lieu of venting, except in the case of emergency upset conditions or certain smaller producing wells. Gas collected from separators and oil treaters, along with vapors from storage tanks, may be processed through a glycol dehydration unit to remove the water from the gas before it is put into a sales pipeline or used again in the dehydration process. A common practice to control production gas from small- and medium-sized operations is to use a gas-fired heater to burn the facility's gas and produce heat to reduce the viscosity of the crude oil product. Some facilities use the production gas to fuel micro-turbines for onsite power needs. Reducing the viscosity of crude oil facilitates the handling within the production operation or the transport via pipeline to the refineries.

The oily water collected from the separators and the oil treaters may flow directly to a sump or may flow to a water treatment facility prior to disposal. At the water treatment facility, the oil content of the water is reduced by skimming tanks, dissolved air flotation units, pits, filters or a combination of these. The water may be used on-site, discharged to the surface, or injected back into water injection wells or disposal wells. Vapor recovery is usually on all of the separation vessels and is piped back to the gas pipeline for dehydration.

Some of the separation and treatment equipment that require permits by the SCAQMD include American Petroleum Institute (API) separators, tanks, vessels, heaters, boilers, vapor recovery units, internal combustion engines and clean-out sumps, which are in most cases part of the wastewater system permit unit, oil dehydration unit or water injection facilities. Open ditches also require a permit, but there are no active permits currently in the South Coast Air Basin. Wastewater associated with the separation and treatment process is regulated by Rule 1176 – VOC Emissions from Wastewater Systems.

#### Workover Rig Operations

Workover rigs are mobile temporary derrick stands that allow the operator to access and replace worn out push rods and piping. These rods are between 32 feet and 46 feet long and are removed and stored vertically. The rods and the piping are pulled up through a casing which is filled with oil and other organic liquid. As a result of their removal, the rods and piping may be wet with hydrocarbon liquid and have the potential to cause odor nuisance complaints. While the amount of VOC emissions released to the atmosphere is minimal, the odor potential is great from these elevated piping, unless measures are taken to wipe excess material during removal.

Workover rigs are used primarily for maintenance on established production wells, and are typically powered by the internal combustion engine used for propulsion. Workover rigs are generally smaller units with lesser power demands than drilling rigs. However, there are occasions where extensive maintenance work would require a supplemental electrical generator to provide additional power. These generators and the portable or temporary internal combustion engines are a potential source of odors and combustion emissions.

## PROJECT DESCRIPTION

To make the complaint process more effective for the complainant and to provide enhanced enforceable mechanisms to reduce odor nuisance potential while preventing public nuisance and possible detriment to public health caused by exposure to VOC, TAC, and TOC emissions from the operation and maintenance of oil and gas production facilities, PAR 1148.1 contains a proposal that would: 1) increase the minimum proximity distance to sensitive receptors (e.g., from 100 meters to 1,500 feet) that would trigger additional emission and odor preventative measures; 2) require the use of odor mitigation best practices for operation and maintenance of oil and gas production facilities; 3) require specific cause analysis and reporting for confirmed odor events and confirmed oil deposition events; 4) require Odor Mitigation Plans for facilities with continuing odor issues; and, 5) make administrative changes by removing obsolete rule language and making minor revisions to promote clarity, consistency, and enforceability throughout the rule. The following is a summary of the key components that comprise PAR 1148.1. A copy of the proposed amended rule can be found in Appendix A.

### Proposed Amended Rule 1148.1 – Oil and Gas Production Wells

#### Purpose - subdivision (a)

This subdivision proposes clarifications that include the reduction of TAC and TOC emissions as contaminants, in addition to VOCs, that will contribute to the overall emission reduction goal. In addition, rule language has been inserted to clarify that both operation and maintenance activities of wellheads are part of the purpose. This subdivision also proposes to enhance the purpose of the rule to prevent public nuisance and possible detriment to public health caused by exposure to VOC, TAC, and TOC emissions.

#### Applicability - subdivision (b)

This subdivision proposes clarifications to include operation and maintenance activities as part of the types of actions that may be applicable to the requirements in the rule. This subdivision also proposes a clarification that identifies other SCAQMD rules that also apply to facilities subject to Rule 1148.1 such as Rule 463 – Organic Liquid Storage, Rule 1173 - Control of Volatile Organic Compound Leaks and Releases From Components at Petroleum Facilities, and, Rule 1176 – VOC Emissions From Wastewater Systems.

#### Definitions - subdivision (c)

The following definitions are proposed for inclusion in PAR 1148.1: “central processing area,” “component,” “confirmed odor event,” “confirmed odor deposition event,” “heavy liquid,” “leak,” “light liquid,” “odor,” “organic liquid,” “responsible party,” “specific cause analysis,” “toxic air contaminant (TAC),” “wastewater,” and “water injection well,” and “workover rig.” In addition, the following existing definitions are proposed for modification in PAR 1148.1: “facility,” “sensitive receptor,” and “volatile organic compound.”

#### Requirements - subdivision (d)

Paragraph (d)(1) proposes a clarification that would specify that the TOC well cellar concentration limit should be measured in accordance with the test method referenced in paragraph (h)(1) (e.g., USEPA Reference Method 21).

Paragraphs (d)(2), (d)(~~87~~) and (d)(~~109~~) propose to delete each obsolete effective date.

New paragraph (d)(3) proposes to require the pump out or removal of organic liquid accumulated in a well cellar within the same day if the well cellar has been verified as a source of odors.

Paragraph (d)(~~43~~) proposes to clarify that drilling activities would also be subject to the pump out/organic liquid removal requirements for well cellars.

Paragraph (d)(~~54~~) proposes to clarify the type of activities that would be exempt from having to comply with the TOC limit.

Paragraph (d)(~~76~~) proposes to extend the proximity distance requirement for triggering additional emission and odor preventative measures for sensitive receptors from 100 meters to 1,500 feet.

New paragraph (d)(~~1140~~) proposes to require the installation of a rubber grommet as part of a maintenance or drill piping, production tubing or sucker rod replacement activity that involves the use of a workover rig.

New paragraph (d)(~~1244~~) proposes to require the operation and maintenance of a centrally located alarmed monitoring system.

New paragraph (d)(~~1342~~) proposes to require the oil and gas production facility to post instructions for the public related to odor complaints.

New paragraph (d)(14) proposes requirements to conduct and report a specific cause analysis for a confirmed oil deposition event.

#### Operator Inspection Requirements - subdivision (e)

Paragraphs (e)(1) and (e)(3) propose to delete each obsolete effective date.

Subparagraph (e)(1)(C) proposes to extend the proximity distance that would trigger the daily visual inspections requirement of stuffing boxes or produced gas handling and control equipment for sensitive receptors from 100 meters to 1,500 feet.

New paragraph (e)(5) proposes to require monthly TOC measurements on any component identified as a potential odor nuisance and if a qualifying leak is identified, to require the repair, replacement, or removal from service the leaking component.

#### Odor Mitigation Requirements - subdivision (f)

Paragraph (f)(1) proposes new requirements for conducting a Specific Cause Analysis and preparing a corresponding report for the occurrence of each confirmed odor event. Specifically, for facilities located within 1,500 feet of a sensitive receptor, upon determination by an SCAQMD inspector of a Confirmed Odor Event (confirmed odor from three or more independent complainants), a Specific Cause Analysis would be required and the affected facility would be required to complete and submit a Specific Cause Analysis report within 30 calendar days following receipt of written notification from the Executive Officer. The Specific Cause Analysis would include a review of the activities and equipment at the facility identified as

contributing or causing the odor in question, in order to determine the contributing factors and ultimately the corrective actions associated with the event. In addition, any applicable SCAQMD rule or permit condition would need to be identified and reviewed for compliance with the requirements. Furthermore, the specific cause analysis should assess proper implementation of internal procedures or preventative maintenance schedules to determine if the facility properly implemented them, if the procedures should be updated to address any performance gaps, or if the operators were adequately trained on the proper adherence to them.

Paragraph (f)(2) proposes new requirements for preparing and submitting a new or modified Odor Mitigation Plan. Specifically, for facilities located within 1,500 feet of a sensitive receptor, upon determination by an SCAQMD inspector of the occurrence of three or more Confirmed Odor Events within a six month period, or the issuance of a single odor related NOV under Rule 402 – Nuisance, an Odor Mitigation Plan would be required. The affected facility would be required to complete and submit an Odor Mitigation Plan (OMP) within 90 calendar days following receipt of written notification from the Executive Officer. In addition, for any facility with an existing approved OMP, an update to the plan would be required following the occurrence of an additional three or more Confirmed Odor Events over a subsequent six month period following the last plan approval, or following the issuance of an odor related NOV under Rule 402 – Nuisance following the last plan approval.

Subparagraph (f)(2)(B) proposes new requirements for Odor Mitigation Plan (OMP) Elements. Specifically, in the event when an OMP is required, an approved OMP would need to identify all the activities and equipment that may contribute or may have contributed to a confirmed odor event, and the OMP would need to identify the internal procedures and requirements used to manage the odors. For example, OMPs would need to identify oil and gas production and wastewater generation equipment and activities, including both normal and spill or release management control operations, with corresponding identification of potential or actual sources of emissions, odors, frequency of operator inspection and history of leaks. Also, the OMP would need to identify any activity involving drilling, well completion or rework, repair, or maintenance of a well, as well as note the sources of emissions, odors, odor mitigation measures for responding to odors and odor complaints. In addition, the OMP would need to specify the procedures used for odor monitoring at the site and fence line and to identify emission points and emission or leak monitoring method used for all wastewater tanks, holding, knockout, and oil/water separation vessels, including any pressure relief devices or vacuum devices attached to the vessels, and record the releases from such devices. Finally, any equipment or activity identified as part of any previously submitted Specific Cause Analysis report would also need to be included in the OMP.

Subparagraph (f)(2)(C) proposes new requirements for odor monitoring and mitigation that would need to be included in an OMP. These requirements are summarized in Table 1-1. In accordance with this subparagraph, the owner and operator of an oil and gas production facility would be required to comply with all provisions of an approved OMP and a violation of any of the terms of the plan would be considered a violation of Rule 1148.1.

**Table 1-1  
Proposed Odor Monitoring and Mitigation Requirements**

PAR 1148.1 Odor Monitoring and Mitigation Requirement	Description
Odor Surveillance	<p>Continual odor surveillance downwind at the perimeter of the property at all times during drilling, well completion, or rework, repair, or maintenance of any well, including water injection wells, recorded hourly.</p> <p>Equivalent odor monitoring equipment may be used in lieu of odor surveillance, subject to approval.</p> <p>If odors are detected from odor surveillance or odor monitoring at the perimeter of the facility, all drilling, well completion, or rework, repair, or maintenance of any well will discontinue until the source or cause of odors are determined and mitigated in accordance with measures previously approved.</p>
<del>Alternative Fuel or Electric Powered Workover Rig<sup>4</sup></del>	<del>Any workover rig used to conduct any drilling, well completion, rework, repair or maintenance of any well, including any production or water injection well, shall be electric powered or natural gas (LNG or CNG), propane (LPG) fired only.</del>
Well Piping and Rod Management	Any removed drill piping, <u>production tubing</u> , and <u>drill sucker rods</u> shall be managed through written procedures that ensures that potential odor producing emissions are minimized through means such as <u>use of a tarp or similar covering</u> or by storing within an enclosed area <u>or other equivalent method</u> .
Tighter Leak Detection and Repair (LDAR)	Reduce the required repair times for components subject to Rule 1173 LDAR to the lowest schedule of one calendar day with an extended repair period of three calendar days (rather than the seven day repair time allowance and seven day extended repair period).
Facility Specific Best Practice	Any corrective action identified in a Specific Cause Analysis report previously submitted by the facility.
Feasibility Assessment	For any odor mitigation or monitoring requirement identified above is determined by the facility to not represent an appropriate best practice for inclusion in the OMP, an evaluation and documentation that states the reason why such provision is not feasible to include, subject to approval by the Executive Officer, must be included in the OMP.

Recordkeeping - subdivision (g)

Paragraph (g)(2) proposes to require records of measurements, cleaning and any activities performed in accordance with the exemption criteria in paragraph (i)(2).

<sup>4</sup> Subsequent to the release of the Draft EA for public review and comment, additional revisions were made to PAR 1148.1 that resulted in the removal of the requirement for the use of an alternative fuel or electric powered workover rig as part of an OMP.

Paragraph (g)(3) proposes to clarify the records maintenance requirements to include any referenced established written company safety manual or policy.

New paragraph (g)(4) proposes to require the operator to maintain, for either three years or five years for a Title V facility, all records and other applicable documents as part of an approved OMP.

Test Methods - subdivision (h)

Subdivision (h) proposes to include an introduction that will replace old paragraph (h)(4) to explain that the allowed test methods will be used to determine compliance and that other equivalent test methods, after review and approval, may also be used.

New paragraph (h)(3) proposes to specify test methods for determining VOC content.

New paragraph (h)(4) proposes to specify the test method for determining the flash point of heavy liquids.

Exemptions - subdivision (i)

Paragraph (i)(2) proposes to exempt portable enclosed storage vessel and associated air pollution control equipment undergoing maintenance and repair from the requirements in paragraphs (d)(4), (d)(6), (d)(7), and (d)(8) if the owner or operator can demonstrate that performing maintenance and repair, drilling or abandonment operation would cause the facility to operate in violation of state or federal regulations, applicable industry safety standards, or a written company safety manual or policy developed to comply with applicable industry safety standards provided that the activities minimize emissions to the atmosphere as much as possible.

Paragraph (i)(4) proposes to not allow the small production exemption for production wells that are located within 1,500 feet of a sensitive receptor.



## **CHAPTER 2**

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# **ENVIRONMENTAL CHECKLIST**

**Introduction**

**General Information**

**Potentially Significant Impact Areas**

**Determination**

**Environmental Checklist and Discussion**

## INTRODUCTION

The environmental checklist provides a standard evaluation tool to identify a project's adverse environmental impacts. This checklist identifies and evaluates potential adverse environmental impacts that may be created by implementing PAR 1148.1.

## GENERAL INFORMATION

Project Title:	<u>Final Environmental Assessment for</u> Proposed Amended Rule 1148.1 – Oil and Gas Production Wells
Lead Agency Name:	South Coast Air Quality Management District
Lead Agency Address:	21865 Copley Drive, Diamond Bar, CA 91765
CEQA Contact Person:	Barbara Radlein, (909) 396-2716, <a href="mailto:bradlein@aqmd.gov">bradlein@aqmd.gov</a>
PAR 1148.1 Contact Person:	Dairo Moody, (909) 396-2333, <a href="mailto:dmoody@aqmd.gov">dmoody@aqmd.gov</a>
Project Sponsor's Name:	South Coast Air Quality Management District
Project Sponsor's Address:	21865 Copley Drive, Diamond Bar, CA 91765
General Plan Designation:	Not applicable
Zoning:	Not applicable
Description of Project:	PAR 1148.1 would: 1) increase the minimum proximity distance to sensitive receptors (e.g., from 100 meters to 1,500 feet) that would trigger additional emission and odor preventative measures; 2) require the use of odor mitigation best practices for operation and maintenance of oil and gas production facilities; 3) require specific cause analysis and reporting for confirmed odor events; 4) require Odor Mitigation Plans for facilities with continuing odor issues; and, 5) make administrative changes by removing obsolete rule language and making minor revisions to promote clarity, consistency, and enforceability throughout the rule. Analysis of the proposed project in the <u>Final Draft</u> -EA did not result in the identification of any environmental topic areas that would be significantly adversely affected by the proposed project.
Surrounding Land Uses and Setting:	Residential, commercial, industrial and/or institutional
Other Public Agencies Whose Approval is Required:	Not applicable

## ENVIRONMENTAL IMPACT AREAS POTENTIALLY AFFECTED

The following environmental impact areas have been assessed to determine their potential to be affected by the proposed project. Any checked items represent areas that may be adversely affected by the proposed project, but after completing the analysis, were shown to have less than significant impacts. An explanation relative to the determination of impacts can be found following the checklist for each area.


<input checked="" type="checkbox"/> Aesthetics	<input type="checkbox"/> Geology and Soils	<input type="checkbox"/> Population and Housing
<input type="checkbox"/> Agriculture and Forestry Resources	<input type="checkbox"/> Hazards and Hazardous Materials	<input type="checkbox"/> Public Services
<input checked="" type="checkbox"/> Air Quality and Greenhouse Gas Emissions	<input type="checkbox"/> Hydrology and Water Quality	<input type="checkbox"/> Recreation
<input type="checkbox"/> Biological Resources	<input type="checkbox"/> Land Use and Planning	<input type="checkbox"/> Solid and Hazardous Waste
<input type="checkbox"/> Cultural Resources	<input type="checkbox"/> Mineral Resources	<input checked="" type="checkbox"/> Transportation and Traffic
<input checked="" type="checkbox"/> Energy	<input type="checkbox"/> Noise	<input checked="" type="checkbox"/> Mandatory Findings <u>of Significance</u>

**DETERMINATION**

On the basis of this initial evaluation:

- I find the proposed project, in accordance with those findings made pursuant to CEQA Guideline §15252, COULD NOT have a significant effect on the environment, and that an ENVIRONMENTAL ASSESSMENT with no significant impacts has been prepared.
- I find that although the proposed project could have a significant effect on the environment, there will NOT be significant effects in this case because revisions in the project have been made by or agreed to by the project proponent. An ENVIRONMENTAL ASSESSMENT with no significant impacts will be prepared.
- I find that the proposed project MAY have a significant effect(s) on the environment, and an ENVIRONMENTAL ASSESSMENT will be prepared.
- I find that the proposed project MAY have a "potentially significant impact" on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL ASSESSMENT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects: 1) have been analyzed adequately in an earlier ENVIRONMENTAL ASSESSMENT pursuant to applicable standards; and, 2) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL ASSESSMENT, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

**Date:** April 28, 2015

**Signature:**   
 Michael Krause  
 Program Supervisor, CEQA Section  
 Planning, Rules, and Area Sources

## ENVIRONMENTAL CHECKLIST AND DISCUSSION

PAR 1148.1 is undergoing amendments in order to further prevent public nuisance and possible detriment to public health caused by exposure to VOC, TAC and TOC emissions from the operation and maintenance of oil and gas production facilities. PAR 1148.1 would: 1) increase the minimum proximity distance to sensitive receptors (e.g., from 100 meters to 1,500 feet) that would trigger additional emission and odor preventative measures; 2) require the use of odor mitigation best practices for operation and maintenance of oil and gas production facilities; 3) require specific cause analysis and reporting for confirmed odor events and confirmed oil deposition events; 4) require Odor Mitigation Plans for facilities with continuing odor issues; and, 5) make administrative changes by removing obsolete rule language and making minor revisions to promote clarity, consistency, and enforceability throughout the rule.

PAR 1148.1 has been evaluated relative to the environmental topics identified in the following environmental checklist (e.g., aesthetics, agricultural and forestry resources, biological resources, etc.). The primary effect of implementing PAR 1148.1 is to enhance compliance of operations at existing oil and gas facilities. Most of the requirements in PAR 1148.1 are procedural in nature and as such, would not be expected to cause any physical changes that that could have secondary adverse environmental effects. For example, while PAR 1148.1 contains new odor monitoring and mitigation requirements that would require any removed drill piping, production tubing and drill-sucker rods to be stored in a manner that would minimize emissions, facility operators would have the option of storing covering the drill piping, production tubing and drill-sucker rods ~~with a tarp, for example, or by storing~~ within an enclosed area, or by some other equivalent method (see clause (f)(2)(C)(iv)) to serve as a wind barrier, such as a covering or freestanding wind screen, for example. Because of the available compliance options for storing removed drill piping, production tubing, and drill-sucker rods, the analysis in this Final Draft-EA assumes that facility operators would not choose to construct new storage areas or modify existing storage areas when an equivalent method and lower cost option that can serve as an effective wind barrier, such as a covering or freestanding wind screen, tarp can be used instead. Thus, the proposed project would not promote the construction of new facilities or structures nor would it cause construction activities to occur at existing facilities. Therefore, potential adverse impacts that result from construction of new structures or modification of existing structures as well as changes in existing land uses are not anticipated to occur as a result of implementing PAR 1148.1.

Of the other enhanced compliance mechanisms that could be triggered by PAR 1148.1, only the requirement in an Odor Mitigation Plan for a workover rig to be powered with electricity, or fueled by natural gas, or propane/liquefied petroleum gas, instead of diesel fuel, could potentially cause a direct physical change to existing oil and gas operations that could have secondary environmental effects. However, at the time of publication of ~~the~~ Draft EA, there ~~were are~~ no known electric or alternative fuel (non-diesel) workover rigs available. In the future, it is possible that electric or alternative fuel workover rigs may become available. Thus, answers to the following checklist items are based on the worst-case assumption that any affected oil and gas facility that becomes subject to the requirements of an Odor Mitigation Plan will be required to utilize an alternative fueled workover rig in lieu of a diesel-fueled workover rig, if available and feasible.

Subsequent to the release of the Draft EA for public review and comment, additional revisions were made to PAR 1148.1 that resulted in the removal of the requirement for the use of an alternative fuel or electric powered workover rig as part of an OMP. While the use of an alternative fuel or electric powered workover rig is no longer a requirement, the analysis relative to the use of an alternative fuel or electric powered workover rig will remain as part of the responses to the environmental checklist to represent a worst-case analysis.

In addition, subsequent to release of the Draft EA, the following modifications were made to the proposed project: 1) new paragraph (d)(3) has been added to require the pump out or removal of organic liquid accumulated in a well cellar the same day in the event the well cellar has been verified as a source of odors; 2) new paragraph (d)(14) has been added to require a facility operator to conduct and report a specific cause analysis for a confirmed oil deposition event; 3) new paragraph (e)(5) has been added to require monthly TOC measurements on any component identified as a potential odor nuisance and if a qualifying leak is identified, to require the repair, replacement, or removal from service the leaking component; and, 4) clause (f)(2)(C)(iv) has been revised to no longer specify covering as part of the new odor monitoring and mitigation requirements that would require any removed drill piping, production tubing and sucker rods to be stored in a manner that would minimize emissions, either within an enclosed area, or by some other equivalent method.

Of these four changes to PAR 1148.1, industry has provided comments relative to item 1) such that requiring the pump out or removal of organic liquid accumulated in a well cellar to occur the same day when the well cellar has been verified as a source of odors may cause an additional vacuum truck trip to the affected facility. Thus, the Draft EA has been revised to include an analysis of what the potential adverse affects of additional vacuum truck trips may cause. These additional assumptions and calculations can be found in Appendix B. The three remaining changes to PAR 1148.1 subsequent to the release of the Draft EA for public review and comment (see items 2 through 4) were determined to be procedural in nature and as such, would not be expected to cause any physical changes that that could cause secondary adverse environmental effects.

Finally, the requirement in paragraph (d)(12) for an operator of an oil and gas production facility to operate and maintain an alarmed monitoring system has been clarified to be applicable to any central processing area that is located within 1,500 feet of a sensitive receptor. This requirement will go into effect within 180 days of July 10, 2015 if the SCAQMD's Governing Board approves the project. Some oil and gas production facilities currently utilize control centers that also allow for monitoring and controlling operating parameters to support efficiency or serve as an indicator for leak related emissions. Industry submitted comments explaining that while oil and gas production facilities currently operate existing monitoring systems to safeguard for fire prevention and emergency response in central processing areas, and that these systems are considered to be centrally located monitoring systems, there are some facilities that may not have monitoring systems for their central processing areas. The SCAQMD staff estimates, based on conversations with industry representatives, that approximately five percent of the 473 facilities (e.g., 24 facilities), currently may not have monitoring systems for their central process areas and would be required to install monitoring systems to comply with this requirement in PAR 1148.1. In order for 24 facilities to install monitoring systems over a 180 day window, this EA assumes that approximately five facilities will have overlapping construction activities on a peak day. Thus, the Draft EA has been revised to include an analysis of what the potential adverse affects

of installing additional monitoring systems may cause and these additional assumptions and calculations can also be found in Appendix B.

Staff has reviewed the modifications to the proposed project and concluded that none of the modifications constitute significant new information or a substantial increase in the severity of an environmental impact, nor provide new information of substantial importance relative to the draft document. In addition, revisions to the proposed project in response to verbal or written comments would not create new, avoidable significant effects. As a result, these revisions do not require recirculation of the document pursuant to CEQA Guidelines §15073.5 and §15088.5.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>I. AESTHETICS.</b> Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

The proposed project impacts on aesthetics will be considered significant if:

- The project will block views from a scenic highway or corridor.
- The project will adversely affect the visual continuity of the surrounding area.
- The impacts on light and glare will be considered significant if the project adds lighting which would add glare to residential areas or sensitive receptors.

**Discussion**

**I. a), b) & c) No Impact.** PAR 1148.1 neither requires construction of new facilities nor requires physical modifications at existing facilities that would entail construction activities. Instead, PAR 1148.1 would enhance monitoring and recordkeeping requirements for facilities subject to the rule. In the event that a facility is required to prepare and obtain approval of an Odor Mitigation Plan, the facility operator would be required to utilize a workover rig that is

either electrically powered or fueled by natural gas or propane, in lieu of diesel fuel, if available and feasible.

The oil and gas industry utilizes workover rigs to conduct drilling, well completion, rework, and repair and maintenance of wells. A workover rig is a mobile, self-propelled unit that is driven directly to the well site and is frequently moved from well to well throughout an oil and gas facility. The power from the rig's engine or engines propels the rig on the road. Currently, only diesel-fueled workover rigs are available.

The length of a workover rig with mast extension can reach up to 65 feet. In addition, the height of a workover rig when the mast is extended into a vertical position can range from 50 feet to 86 feet for single-mast workover rigs and from 96 feet to 124 feet for double-mast workover rigs. The required drilling depth is what determines the type and horsepower rating of a workover rig needed for a particular well. Nonetheless, the requirement to utilize an electric or alternative fuel workover rig to comply with an Odor Mitigation Plan would not affect the choice of whether a single- or double-mast rig would be utilized and as such, the height of any replacement workover rig is not expected to change from the existing setting as a result of implementing PAR 1148.1. Thus, the visual appearance between a diesel-fueled workover rig and an electric or alternative fuel workover rig would not be expected to have physical differences that would be discernable from outside of an oil and gas facility's property, regardless of where the workover rig is located within the property at the time of observation.

Typically, oil and gas production wells facilities are located throughout the District within predominantly industrial or commercial areas while some are located adjacent to residential neighborhoods. The visual character of the areas in which the various oil and gas production wells facilities are located can be quite varied, but would be expected to remain the same because PAR 1148.1 would not require modifications to existing structures or new construction of structures at the affected facilities. Further, in the event that an Odor Mitigation Plan is required and an electric or alternative fuel workover rig is employed at a given facility, scenic vistas, if any are located near an affected facility, would not be expected to change or be adversely affected since the height profile and overall footprint of any replacement workover rig is not expected to be discernably different from a diesel-fueled workover rig.

In addition, in response to industry's comment that an additional vacuum truck may be needed to pump out a well cellar on the same day that it has been verified as a source of odors, the analysis assumes that a peak day of three additional vacuum trucks may be needed. This assumption is based on past complaint data for Rule 1148.1 facilities which has shown that only three facilities experienced the potential equivalent of three or more confirmed odor events or received a Rule 402 NOV. Thus, in the event that three separate facilities would need to have one additional vacuum truck visit the premises to pump out a well cellar, the presence of these vacuum trucks will not be visibly different from the vacuum trucks that currently service well cellars and other equipment at the affected oil and gas facilities.

Finally, in response to industry's comment that some facilities may need to install monitoring equipment, the analysis assumes a total of 24 facilities may be affected and that five facilities on a peak day may undergo light construction activities for one day. The construction activities would involve a work crew of three to install the monitoring equipment and make the electrical connections and one delivery truck to deliver supplies for the workers. The presence of these



work crews will not be visibly different from the work crews currently employed on a day-today basis at the affected oil and gas facilities.

Thus, implementation of PAR 1148.1 would not result in any new construction of buildings or other structures or the modification to existing structures that would obstruct scenic vistas or scenic resources, or degrade the existing visual character of a site, including but not limited to, trees, rock outcroppings, or historic buildings.

**I.d) No-Less Than Significant Impact.** While facilities with oil and gas production wells typically operate 24 hours per day, there are no components in the proposed project that would specifically require new nighttime activities to occur beyond baseline conditions which already have existing permanent night lighting in place for safety and security reasons. Further, workover operations typically occur during daytime and PAR 1148.1 does not contain any provisions that would require facilities to conduct workover operations at night. Nonetheless, in the event that an Odor Mitigation Plan is required and an electric or alternative fuel workover rig is required and that facility operator chooses to operate the equipment at night, the nighttime lighting that would be needed to safely operate an electric or alternative fuel workover rig would not be expected to be any different from the nighttime lighting needs for operating a diesel-fueled workover rig.

However, in response to industry's comment that an additional vacuum truck may be needed to pump out a well cellar on the same day if it has been verified as a source of odors, it is possible that the operation of a vacuum truck may occur at night, depending on what time of day the odor source is verified and the lag time that may occur to get a vacuum truck to the site. In the event that a vacuum truck is needed to operate at night, the analysis assumes that temporary portable lighting equipment may be needed, if lighting does not already exist at or near the affected well cellar, to provide sufficient lighting to safely direct the vacuum hose to the affected location. If temporary portable lighting is required, then a diesel generator set may be needed to supply the power to the lighting equipment.

As discussed earlier in Sections a), b) and c) of this topic area, past complaint data for Rule 1148.1 facilities has shown that only three facilities experienced the potential equivalent of three or more confirmed odor events or received a Rule 402 NOV. Thus, in the event that three separate facilities would each need to have one additional vacuum truck visit the premises to pump out a well cellar, and if circumstances exist that these activities would occur at night, then three additional diesel generator sets to power three portable lighting units could be needed on a peak day. While these circumstances could create a potential for additional nighttime lighting, the lighting would only be needed for as long as each vacuum truck is operating. Vacuum trucks have pumps that can suction up to 4,000 cubic feet per minute of material, so depending on the volume of material needed to be pumped out, the vacuum truck and any needed lighting would likely be needed from five minutes to one hour. However, to be conservative, the analysis assumes that three vacuum trucks and three generator sets to support lighting equipment would each operate for two hours on a peak day.

In the event that nighttime operations of vacuum truck are needed, the nighttime lighting that would be needed to safely operate the vacuum truck would need to be directed downward towards the well cellar. Once the vacuum truck has completed its task, the lighting and associated generator would be shut off.

Finally, in response to industry’s comment that some facilities may need to install monitoring equipment, the analysis assumes a total of 24 facilities may be affected and that five facilities on a peak day may undergo light construction activities for one day per facility. The construction activities would involve a work crew of three to install the monitoring equipment and make the electrical connections and one delivery truck to deliver supplies for the workers and these activities are expected to occur during daylight hours. As such, no new nighttime lighting, either temporary or permanent would be needed to install or operate the monitoring equipment.

Thus, even if temporary lighting may be needed under limited circumstances, additional light or glare would not be created which would significantly adversely affect day or nighttime views in the area ~~since no new light generating equipment would be required to comply with the requirements in PAR 1148.1.~~

Based upon these considerations, significant adverse aesthetics impacts are not expected from implementing PAR 1148.1, and thus, this topic will not be further analyzed. Since no significant aesthetics impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>II. AGRICULTURE AND FORESTRY RESOURCES.</b> Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland mapping and Monitoring Program of the California Resources Agency, to non- agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104 (g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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## Significance Criteria

Project-related impacts on agriculture and forest resources will be considered significant if any of the following conditions are met:

- The proposed project conflicts with existing zoning or agricultural use or Williamson Act contracts.
- The proposed project will convert prime farmland, unique farmland or farmland of statewide importance as shown on the maps prepared pursuant to the farmland mapping and monitoring program of the California Resources Agency, to non-agricultural use.
- The proposed project conflicts with existing zoning for, or causes rezoning of, forest land (as defined in Public Resources Code §12220 (g)), timberland (as defined in Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code § 51104 (g)).
- The proposed project would involve changes in the existing environment, which due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use.

## Discussion

**II. a), b), c), & d) No Impact.** Implementation of PAR 1148.1 would not result in any new construction or modification of buildings or other structures. Similarly, the proposed project would not require affected facility operators to acquire additional land. All compliance activities that would occur as a result of implementing the proposed project are expected to occur within the confines of each existing affected facility. The proposed project would be consistent with the zoning requirements for the existing facilities and there are no agriculture or forest resources or operations on or near the affected facilities. No agricultural resources including Williamson Act contracts are located within or would be impacted by operation activities at the affected facilities. Therefore, the proposed project would not result in any new construction of buildings or other structures that would convert farmland to non-agricultural use or conflict with zoning for agricultural use or a Williamson Act contract. Since the proposed project would not alter any facility or process, there are no provisions in the proposed project that would affect land use plans, policies, or regulations. Land use and other planning considerations are determined by local governments and no land use or planning requirements relative to agricultural resources will be altered by the proposed project. For these same reasons, PAR 1148.1 would not result in the loss of forest land or conversion of forest land to non-forest use.

Based upon these considerations, significant agricultural and forest resources impacts are not expected from implementing PAR 1148.1, and thus, this topic will not be further analyzed. Since no significant agriculture and forest resources impacts were identified, no mitigation measures are necessary or required.

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	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>III. AIR QUALITY AND GREENHOUSE GAS EMISSIONS.</b>				
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Diminish an existing air quality rule or future compliance requirement resulting in a significant increase in air pollutant(s)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Air Quality Significance Criteria

To determine whether or not air quality impacts from implementing PAR 1148.1 are significant, impacts will be evaluated and compared to the criteria in Table 2-1. The project will be considered to have significant adverse air quality impacts if any one of the thresholds in Table 2-1 are equaled or exceeded.

**Table 2-1**  
**SCAQMD Air Quality Significance Thresholds**

<b>Mass Daily Thresholds <sup>a</sup></b>		
<b>Pollutant</b>	<b>Construction <sup>b</sup></b>	<b>Operation <sup>c</sup></b>
<b>NO<sub>x</sub></b>	100 lbs/day	55 lbs/day
<b>VOC</b>	75 lbs/day	55 lbs/day
<b>PM<sub>10</sub></b>	150 lbs/day	150 lbs/day
<b>PM<sub>2.5</sub></b>	55 lbs/day	55 lbs/day
<b>SO<sub>x</sub></b>	150 lbs/day	150 lbs/day
<b>CO</b>	550 lbs/day	550 lbs/day
<b>Lead</b>	3 lbs/day	3 lbs/day
<b>Toxic Air Contaminants (TACs), Odor, and GHG Thresholds</b>		
<b>TACs</b> (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk $\geq$ 10 in 1 million Cancer Burden $>$ 0.5 excess cancer cases (in areas $\geq$ 1 in 1 million) Chronic & Acute Hazard Index $\geq$ 1.0 (project increment)	
<b>Odor</b>	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
<b>GHG</b>	10,000 MT/yr CO <sub>2</sub> eq for industrial facilities	
<b>Ambient Air Quality Standards for Criteria Pollutants <sup>d</sup></b>		
<b>NO<sub>2</sub></b>  1-hour average annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
<b>PM<sub>10</sub></b> 24-hour average annual average	10.4 $\mu\text{g}/\text{m}^3$ (construction) <sup>e</sup> & 2.5 $\mu\text{g}/\text{m}^3$ (operation) 1.0 $\mu\text{g}/\text{m}^3$	
<b>PM<sub>2.5</sub></b> 24-hour average	10.4 $\mu\text{g}/\text{m}^3$ (construction) <sup>e</sup> & 2.5 $\mu\text{g}/\text{m}^3$ (operation)	
<b>SO<sub>2</sub></b> 1-hour average 24-hour average	0.25 ppm (state) & 0.075 ppm (federal – 99 <sup>th</sup> percentile) 0.04 ppm (state)	
<b>Sulfate</b> 24-hour average	25 $\mu\text{g}/\text{m}^3$ (state)	
<b>CO</b>  1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
<b>Lead</b>  30-day Average Rolling 3-month average	1.5 $\mu\text{g}/\text{m}^3$ (state) 0.15 $\mu\text{g}/\text{m}^3$ (federal)	

<sup>a</sup> Source: SCAQMD CEQA Handbook (SCAQMD, 1993)

<sup>b</sup> Construction thresholds apply to both the South Coast Air Basin and Coachella Valley (Salton Sea and Mojave Desert Air Basins).

<sup>c</sup> For Coachella Valley, the mass daily thresholds for operation are the same as the construction thresholds.

<sup>d</sup> Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.

<sup>e</sup> Ambient air quality threshold based on SCAQMD Rule 403.

KEY: lbs/day = pounds per day    ppm = parts per million     $\mu\text{g}/\text{m}^3$  = microgram per cubic meter     $\geq$  = greater than or equal to  
MT/yr CO<sub>2</sub>eq = metric tons per year of CO<sub>2</sub> equivalents     $>$  = greater than

## Discussion

**III. a) No Impact.** Rule 1148.1 was adopted in 2004 to implement portions of the 2003 AQMP Control Measure FUG-05 – Emission Reductions from Fugitive Emission Sources, to reduce VOC emissions from well cellars and sources of untreated process gas located at oil and gas production facilities. PAR 1148.1 would not change any of the current VOC reduction aspects in the rule but instead would improve upon compliance activities in order to minimize the potential for nuisance and odor impacts to local residents and sensitive receptors that are often located nearby from ongoing operations that do not include drilling. As with Rule 1148.1, the proposed project will continue to assist the SCAQMD’s progress in attaining and maintaining the ambient air quality standards for ozone. Further, because the 2012 AQMP demonstrates that the effects of all existing rules, in combination with implementing all AQMP control measures (including “black box” measures not specifically described in the 2012 AQMP) would bring the district into attainment with all applicable national and state ambient air quality standards, implementing PAR 1148.1 is not expected to conflict with or obstruct implementation of the applicable air quality control plan. Since no significant impacts were identified for this issue, no mitigation measures are necessary or required.

**III. b) Less Than Significant Impact.** For a discussion of these items, refer to the following analysis.

PAR 1148.1 neither requires the construction of new facilities nor requires physical modifications at existing facilities that would entail construction activities. Instead, PAR 1148.1 would enhance compliance activities by making monitoring and recordkeeping requirements more stringent for facilities subject to the rule. Thus, since there would be no construction activities that would utilize construction equipment or would require worker trips, equipment delivery trips and other haul trips, no construction emissions would be generated. Thus, there would be no significant construction air quality and GHG impacts from implementing PAR 1148.1.

However, in the event that a facility is required to prepare and obtain approval of an Odor Mitigation Plan, the facility operator would be required to utilize a workover rig that is either electrically powered or fueled by natural gas or propane, in lieu of diesel fuel, if available and feasible. At the time of publication of this ~~Final Draft~~-EA, there are no known electric or alternative fuel workover rigs in existence but it is possible that electric or alternative fuel workover rigs may be developed and become available in the future. Even though CEQA does not require speculation of the unknown, CEQA Guidelines §15144 recognizes that some degree of forecasting is needed in order to prepare a CEQA document. While foreseeing the unforeseeable is not possible, SCAQMD staff is required to use its best efforts to find out and disclose all that it reasonably can. For this reason, this ~~Final Draft~~-EA examines the possibility that electric or alternative fuel workover rigs may become available in the future and makes some assumptions in order to attempt to disclose any potential secondary adverse air quality impacts that may be associated with the reliance on the future use of electricity and/or alternative fuels for implementing an Odor Mitigation Plan.

As explained in Chapter 1, workover rigs are regularly utilized at oil and gas production facilities to conduct well maintenance such as the repair or replacement of pull rods or well casings on an oil or gas well. Workover rigs are equipped with diesel engines that range from 150 horsepower

(hp) to 1,000 hp but on average, workover rigs are rated at 475 hp. In addition, workover rigs have a drilling/casing access capability that can range from 8,000 to 30,000 feet in depth. Fuel usage is dependent on the type and rating of the workover rig and the depth to which the workover rig can access the well casings.

According to the California Air Resources Board (CARB), in 2000, there were 256 workover rigs operating throughout California and these rigs consumed 3,222,000 gallons of diesel fuel<sup>5</sup>. Of this amount, the amount of diesel fuel consumed by workover rigs in Los Angeles, Orange, Riverside and San Bernardino counties combined was 387,748 gallons<sup>6</sup>. On average, each workover rig consumed approximately 12,600 gallons of diesel per year. CARB's CEIDARS database estimates that one workover rig will typically operate up to 3,000 hours per year which translates to consuming an average of approximately 4.2 gallons of diesel fuel per hour per workover rig.

CARB's off-road simulation model projected from the 2010 population of workover rigs in California to be approximately 638<sup>7</sup>, with approximately 68 projected to operate in Los Angeles, Orange, Riverside and San Bernardino counties in 2015<sup>8</sup>. If all 68 workover rigs operate for 3,000 hours in 2015, the estimated diesel fuel consumption would be approximately 856,800 gallons in 2015. By applying diesel emission factors, the projected baseline emissions from diesel fuel consumption from 68 workover rigs operating in 2015 in Los Angeles, Orange, Riverside and San Bernardino counties can be calculated. Similarly, based on the amount of fuel consumption, the baseline amount of diesel fuel trucks utilized and the associated emissions can also be calculated. Table 2-2 contains a summary of the baseline emissions of diesel fuel consumption from the operation of workover rigs and the fuel truck deliveries.

**Table 2-2**  
**Baseline Emissions from Diesel-Fueled Workover Rigs Operated**  
**in Los Angeles, Orange, Riverside, and San Bernardino Counties**

Activity	VOC (lb/day)	CO (lb/day)	NOx (lb/day)	SOx (lb/day)	PM10 (lb/day)	PM2.5 (lb/day)	CO <sub>2</sub> eq <sup>1</sup> (MT/yr)
Operation of 68 Workover Rigs (Baseline)	25.47	273.35	1,029.10	16.24	18.43	16.95	4,033.08
Transport emissions from Delivering Diesel Fuel (387,748 gallons = Baseline)	0.36	1.53	4.25	0.01	0.21	0.18	4.36
<b>TOTAL</b>	<b>25.83</b>	<b>271.82</b>	<b>1,033.35</b>	<b>16.25</b>	<b>18.64</b>	<b>17.13</b>	<b>4,037.44</b>

<sup>1</sup> 1 metric ton = 2,205 pounds

<sup>5</sup> CARB, Central California Ozone Study II, Emission Inventory Project, Attachment L, January 15, 2003. [http://www.arb.ca.gov/ei/areasrc/ccosmeth/att\\_1\\_fuel\\_combustion\\_for\\_petroleum\\_production.doc&sa=U&ei=mHUoVeGYJo7aoATo3YD4CA&ved=0CAUQFjAC&client=internal-uds-cse&usg=AFQjCNHh2Bt0d7LDdY4Y3s8JrTVwWud-Hg](http://www.arb.ca.gov/ei/areasrc/ccosmeth/att_1_fuel_combustion_for_petroleum_production.doc&sa=U&ei=mHUoVeGYJo7aoATo3YD4CA&ved=0CAUQFjAC&client=internal-uds-cse&usg=AFQjCNHh2Bt0d7LDdY4Y3s8JrTVwWud-Hg)

<sup>6</sup> CARB, Central California Ozone Study II, Emission Inventory Project, Attachment L spreadsheet calculations, December 10, 2002. <http://www.arb.ca.gov/ei/areasrc/ccosmethods.htm>

<sup>7</sup> CARB, Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements, Appendix D, Table D-5, page D-7, October 2010.

<sup>8</sup> CARB's Almanac Emission Projection Data by EIC (published in 2009).

PAR 1148.1 contains a requirement for an owner/operator of a facility that is located within 1,500 feet of a sensitive receptor to prepare and submit for approval an Odor Mitigation Plan in the event that the facility either receives one Rule 402 NOV or three confirmed odor events within six consecutive months. An element of the Odor Mitigation Plan requires the use of a workover rig that is either powered by electricity or by an alternative fuel (e.g., natural gas or propane). Past compliance complaint data for Rule 1148.1 facilities has shown that only three facilities experienced the potential equivalent of more than three or more confirmed odor events or received a Rule 402 NOV. Thus, if PAR 1148.1 is implemented, it is possible that there could be as many as three Odor Mitigation Plans that would require the use of three electric or alternative fuel workover rigs in lieu of diesel-fueled workover rigs. By applying this potential reduction in use of three diesel workover rigs, the 2015 baseline for diesel-fueled workover rigs would be slightly reduced. Thus, a small reduction in diesel-based combustion emissions would be expected from the replacement of three diesel-fueled workover rigs with non-diesel workover rigs at the three facilities that would be subject to an Odor Mitigation Plan. Further, the baseline amount of diesel fuel needed to operate the remaining workover rigs would be reduced by 37,800 gallons per year. Tanker trucks carrying diesel fuel typically carry about 8,500 gallons per load. Thus, an annual reduction of diesel fuel used for workover rigs of 37,800 gallons would mean that there would be five less trucks per year delivering diesel fuel in the region which in turn would reduce the amount of diesel fuel to operate the truck and the associated combustion emissions. However, depending on the source of fuel obtained for the alternative fuel workover rigs, these reductions in delivery trips and the associated combustion emissions could be offset by delivery trips of alternative fuels to supply the non-diesel workover rigs. Table 2-3 contains a summary of what the adjusted baseline emissions could be after PAR 1148.1 is implemented (e.g., three less diesel-fueled workover rigs) and Table 2-4 contains a summary of the net emissions reductions between the current baseline and the adjusted baseline after PAR 1148.1 is implemented. Appendix B contains the spreadsheets for the proposed project with the results based on the assumptions used by the SCAQMD staff for this analysis.

**Table 2-3**  
**Emissions from Diesel-Fueled Workover Rigs Operated in Los Angeles, Orange, Riverside, and San Bernardino Counties After Implementing PAR 1148.1**

Activity	VOC (lbs/day)	CO (lbs/day)	NOx (lbs/day)	SOx (lbs/day)	PM10 (lbs/day)	PM2.5 (lbs/day)	CO2eq <sup>1</sup> (MT/yr)
Operation of 65 Workover Rigs (Reduction due to PAR 1148.1)	24.35	261.29	983.70	15.52	17.61	16.21	3,855.15
Transport emissions from Reduced Deliveries of Diesel Fuel (349,948 gallons due to PAR 1148.1)	0.36	1.53	4.25	0.01	0.21	0.18	3.93
<b>TOTAL</b>	<b>24.71</b>	<b>262.82</b>	<b>987.95</b>	<b>15.53</b>	<b>17.82</b>	<b>16.39</b>	<b>3,859.08</b>

<sup>1</sup> 1 metric ton = 2,205 pounds



**Table 2-4**  
**Net Difference Between Baseline and PAR 1148.1 Emissions from Diesel-Fueled Workover Rigs Operated in Los Angeles, Orange, Riverside, and San Bernardino Counties**

<b>Activity</b>	<b>VOC (lbs/day)</b>	<b>CO (lbs/day)</b>	<b>NO<sub>x</sub> (lbs/day)</b>	<b>SO<sub>x</sub> (lbs/day)</b>	<b>PM10 (lbs/day)</b>	<b>PM2.5 (lbs/day)</b>	<b>CO<sub>2</sub>eq<sup>1</sup> (MT/yr)</b>
Baseline	25.83	271.82	1,033.35	16.25	18.64	17.13	4,037.44
PAR 1148.1	24.71	262.82	987.95	15.53	17.82	16.39	3,859.08
<b>NET DIFFERENCE<sup>2</sup></b>	<b>(1.12)</b>	<b>(9.00)</b>	<b>(45.40)</b>	<b>(0.72)</b>	<b>(0.82)</b>	<b>(0.74)</b>	<b>(178.36)</b>
<b>SIGNIFICANCE THRESHOLD</b>	<b>55</b>	<b>550</b>	<b>55</b>	<b>150</b>	<b>150</b>	<b>55</b>	<b>10,000</b>
<b>SIGNIFICANT?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

<sup>1</sup> 1 metric ton = 2,205 pounds

<sup>2</sup> ( ) means a reduction

While there currently are no known electrically powered or alternative fuel workover rigs available at the time of publication of this document, if they become available, additional infrastructure to support electric and alternative fuel workover rigs may be needed for any facility that becomes subject to an Odor Mitigation Plan. Secondary impacts to air quality could occur from increased electricity usage for electric workover rigs and from increased production and use of alternative fuels (e.g., source of natural gas or propane) for non-diesel workover rigs.

For example, an increase in the use of electric workover rigs would require the generation of additional electricity at each affected oil and gas facility or at the grid. Many oil and gas facilities produce their own electricity using generators, fuel cells, cogeneration units, or combined heat and power units by burning their own source of fuel onsite (e.g., field gas or treated natural gas). If an electric workover rig is developed and becomes commercially available, some facilities may be able to tie into their existing electricity supply to provide power to an electric workover rig. However, since workover rigs move around within an oil and gas facility from well to well, electricity may not be available near every well location, so it may not be practical or feasible to employ an electric workover rig in all cases since the availability of electricity generated by an oil and gas facility and its proximity from wells will vary from facility to facility. For this reason, facility operators will need to determine on a case-by-case basis whether an electric workover rig could be tied-in to existing electricity supplies.

If existing electricity supplies are insufficient, then facility operators could choose to install electricity generating equipment in order to support the operation of an electric workover rig. However, electricity generation within the district is subject to applicable SCAQMD rules and permitting requirements such as Rule 1134 – Emissions of Oxides of Nitrogen from Stationary Gas Turbines, Rule 1135 – Emissions of Oxides of Nitrogen from Stationary Gas Turbines, and Regulation XX – RECLAIM. These rules and regulations focus on regulating NO<sub>x</sub> emissions (the primary pollutant of concern from natural gas combustion to generate electricity) from existing power generating equipment. Although emissions from electric utilities in the district are capped under the RECLAIM program (and under Rule 1135), any new power generating facilities in the district to accommodate increased electricity demand would be subject to SCAQMD Regulation XIII – New Source Review, or Rule 2005 which requires installation of BACT, air quality modeling would be required to demonstrate that new emissions would not result in significant ambient air quality impacts (so there would be no localized impacts), and emission offsets (through either emission reduction credits or RECLAIM trading credits) before

permits could be issued. Emission offsets for NO<sub>x</sub> emissions, for example, would be at a ratio of 1.2 to 1.0, or 1.2 pounds of emission reduction credits required for every new pound of NO<sub>x</sub> emitted from the power generating source (or a ratio of 1.0 to 1.0 for RECLAIM sources). A separate CEQA evaluation would be required to evaluate the effects of any proposal to install new electricity generating equipment. Further, emissions from the combustion of diesel fuel are generally the emissions that would be reduced when electrification is proposed and replaced with emissions from the combustion of natural gas (as would generally occur from electricity generating equipment and facilities in the district). Emissions from diesel combustion are an order of magnitude higher than emissions from the combustion of natural gas. So overall, criteria pollutant and GHG emissions would be expected to decrease.

While there could be an increase in emissions from generators that may be used to charge batteries in remote locations within an oil and gas facility where no grounded power source is available, generators are also regulated sources in the district. Existing SCAQMD regulations that apply to generators and emergency generators would apply to generators used to charge batteries. New generators would be subject to Regulation XIII or Rule 2005. Existing generators are subject to SCAQMD Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Internal Combustion Engines. Rule 1110.2 does not establish a facility emission cap, but establishes a stringent NO<sub>x</sub> emission rate. Truly portable equipment may also be regulated under the state registration program, which establishes emission limitations on NO<sub>x</sub>, VOCs, and CO.

The SCAQMD does not regulate electricity generating facilities outside of the district so the rules and regulations discussed above do not apply to electricity generating facilities outside of the district. In 2010, about 71 percent of the electricity used in California was generated in-state and about 29 percent was imported (see Section 3.2.3). While these electricity generating facilities would not be subject to SCAQMD rules and regulations, they would be subject to the rules and regulations of the state or local air pollution control district in which they are located and the U.S. EPA. These agencies also have established New Source Review regulations for new and modified facilities that generally require compliance with BACT or lowest achievable emission reduction technology. Most in-state electricity generating plants use natural gas, which provides a relatively clean source of fuel (as compared to coal- or diesel-fueled plants). The emissions from these power plants would also be controlled by local, state, and federal rules and regulations, minimizing overall air emissions.

Power plants in California provided approximately 71 percent of the total in-state electricity demand in 2010 of which 15 percent came from renewable sources such as biomass, geothermal, small hydro, solar, and wind, which are clean sources of energy. These sources of electricity generate little, if any, air emissions. Increased use of these and other clean technologies will continue to minimize emissions from the generation of electricity. State law requires increasing the use of renewable energy to 20 percent by 2017 and to 33 percent by 2020.

One gallon of diesel is equivalent to 0.027 kWh of electricity, so utilizing 12,600 gallons of diesel to operate one 1,000 hp workover rig for 3,000 hours per year would be equivalent to using approximately 340 kilowatt-hours (kWh) of electricity<sup>9</sup> in one electric workover rig. Thus, if three diesel-fueled workover rigs are replaced with three electric workover rigs, the total

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<sup>9</sup> California Energy Commission, Energy Almanac, Gasoline Gallon Equivalents (GGE) for Alternative Fuels, accessed April 24, 2015. <http://www.energyalmanac.ca.gov/transportation/gge.html>

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electricity demand would be approximately 1,021 kWh. Electricity impacts from energy demand are analyzed and found in the energy section of this chapter.

Although the secondary air quality impacts from construction of infrastructure projects cannot be quantified at this time due to speculation, construction to install an electrical distribution network within an oil and gas facility could potentially require an intensive effort and substantial expense that may also incur short-term significant air quality impacts depending on the extent of construction and the location(s) where the electric workover rigs would be needed. If this ends up being the case, an affected facility operator may explore utilizing alternative fuel workover rigs in lieu of an electric workover rig if it is more economical and convenient. As such, this incremental increase in electricity demand is not expected to create significant adverse air quality impacts compared to emission reductions that would occur from utilizing non-diesel workover rigs.

If an electric tie-in is not feasible, then facility operators may explore utilizing alternative fuel workover rigs, if available. To estimate what the fuel use may be for one alternative fueled workover rig, one gallon of diesel fuel is equivalent to using approximately 0.558 gallons of liquefied natural gas (LNG), 0.729 therm of compressed natural gas (CNG), and 0.653 gallons of liquefied petroleum gas/propane (LPG)<sup>8</sup>. Thus, replacing one diesel workover rig with an alternative fuel workover rig, would utilize approximately 7,031 gallons per year of LNG, or 9,185 therms per year of CNG, or 8,228 gallons per year of LPG. Similarly, if three diesel-fueled workover rigs are replaced with three alternative fuel workover rigs, the total demand would be approximately 21,092 gallons per year of LNG, or 27,556 therms per year of CNG, or 24,683 gallons per year of LPG.

To understand what the air quality and GHG impacts would be from burning these alternative fuels in workover rigs, the peak daily emissions from operating three workover rigs for each alternative fuel was estimated, the alternative fuel with the highest values were compared to the reduction in peak daily emissions due to reducing diesel fuel use. These values are summarized in Table 2-5.

**Table 2-5**  
**Estimated Emissions from Alternative Fuel Workover Rigs**  
**Based on Diesel Fuel Usage Equivalency**

Activity	VOC (lbs/day)	CO (lbs/day)	NO <sub>x</sub> (lbs/day)	SO <sub>x</sub> (lbs/day)	PM10 (lbs/day)	PM2.5 (lbs/day)	CO <sub>2</sub> eq <sup>1</sup> (MT/yr)
Operation of 3 LNG Workover Rigs	0.44	N/A	1.38	N/A	0.07	0.06	0.15
Operation of 3 CNG Workover Rigs	4.25	N/A	13.45	N/A	0.67	0.62	1.5
Operation of 3 LPG Workover Rigs	0.51	N/A	1.61	N/A	0.08	0.07	0.18
<b>PEAK DAILY INCREASE FROM ALTERNATIVE FUEL (CNG)</b>	<b>4.25</b>	<b>N/A</b>	<b>13.45</b>	<b>N/A</b>	<b>0.67</b>	<b>0.62</b>	<b>1.5</b>
<b>PEAK DAILY DECREASE FROM REDUCING DIESEL FUEL<sup>2</sup></b>	<b>(1.12)</b>	<b>(9.00)</b>	<b>(45.40)</b>	<b>(0.72)</b>	<b>(0.82)</b>	<b>(0.74)</b>	<b>(178.36)</b>
<b>NET DIFFERENCE<sup>2</sup></b>	<b>3.13</b>	<b>(9.00)</b>	<b>(31.95)</b>	<b>(0.72)</b>	<b>(0.15)</b>	<b>(0.12)</b>	<b>(176.86)</b>
<b>SIGNIFICANCE THRESHOLD</b>	<b>55</b>	<b>550</b>	<b>55</b>	<b>150</b>	<b>150</b>	<b>55</b>	<b>10,000</b>
<b>SIGNIFICANT?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

N/A = Not calculated due to lack of available emission factors

<sup>1</sup> 1 metric ton = 2,205 pounds

<sup>2</sup> ( ) means a reduction

Subsequent to the release of the Draft EA, industry commented that an additional vacuum truck may be needed to pump out a well cellar on the same day if it has been verified as a source of odors. In addition, if the operation of a vacuum truck occurs at night, temporary portable lighting equipment may be needed, if lighting does not already exist at or near the affected well cellar, to provide sufficient lighting to safely direct the vacuum hose to the affected location. If temporary portable lighting is required, then a diesel generator set may be needed to supply the power to the lighting equipment.

As explained in Section I - Aesthetics, past complaint data for Rule 1148.1 facilities has shown that only three facilities experienced the potential equivalent of three or more confirmed odor events or received a Rule 402 NOV. Thus, in the event that three separate facilities would each need to have one additional vacuum truck visit the premises to pump out a well cellar, and if circumstances exist that these activities would occur at night, then three additional diesel generator sets to power three portable lighting units could be needed on a peak day. While these circumstances could create a potential for additional nighttime lighting, the lighting would only be needed for as long as each vacuum truck is operating. Vacuum trucks have pumps that can suction up to 4,000 cubic feet per minute of material, so depending on the volume of material needed to be pumped out of a well cellar, the vacuum truck and any needed lighting would likely be needed from five minutes to one hour. However, to be conservative, the analysis assumes that three vacuum trucks and three generator sets to support lighting equipment would each operate for two hours on a peak day.

Table 2-6 contains a summary of what the emissions could be in the event three vacuum trucks and three generator sets operate on a peak day. Appendix B contains the spreadsheets for the proposed project with the results based on the assumptions used by the SCAQMD staff for this analysis.

**Table 2-6**  
**Estimated Emissions from Vacuum Trucks and Generator Sets**

<u>Activity</u>	<u>VOC (lbs/day)</u>	<u>CO (lbs/day)</u>	<u>NO<sub>x</sub> (lbs/day)</u>	<u>SO<sub>x</sub> (lbs/day)</u>	<u>PM10 (lbs/day)</u>	<u>PM2.5 (lbs/day)</u>	<u>CO<sub>2</sub>eq<sup>1</sup> (MT/yr)</u>
<u>Operation of 3 Vacuum Trucks</u>	<u>0.27</u>	<u>1.15</u>	<u>3.18</u>	<u>0.01</u>	<u>0.16</u>	<u>0.13</u>	<u>0.29</u>
<u>Operation of 3 Generator Sets</u>	<u>0.01</u>	<u>0.05</u>	<u>0.13</u>	<u>0.00</u>	<u>0.01</u>	<u>0.01</u>	<u>0.01</u>
<u>PEAK DAILY INCREASE</u>	<u>0.28</u>	<u>1.20</u>	<u>3.31</u>	<u>0.01</u>	<u>0.17</u>	<u>0.14</u>	<u>0.30</u>
<u>SIGNIFICANCE THRESHOLD</u>	<u>55</u>	<u>550</u>	<u>55</u>	<u>150</u>	<u>150</u>	<u>55</u>	<u>10,000</u>
<u>SIGNIFICANT?</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>

<sup>1</sup> 1 metric ton = 2,205 pounds

Finally, in response to industry's comment that some facilities may need to install monitoring equipment, the analysis assumes a total of 24 facilities may be affected and that five facilities on a peak day may undergo light construction activities for one day per facility. For each affected facility, the construction activities would be expected to involve a work crew of three to install the monitoring equipment and make the electrical connections and one delivery truck to deliver supplies for the workers. Table 2-7 contains a summary of what the construction emissions would be in the event that five facilities install five monitoring systems on a peak day. Table 2-8 contains a summary of what the GHG construction emissions would be in the event that all 24 facilities have 24 monitoring systems installed. Appendix B contains the spreadsheets for the proposed project with the results based on the assumptions used by the SCAQMD staff for this analysis.

**Table 2-7**  
**Estimated Construction Emissions from Installing Monitoring Systems on a Peak Day**

<u>Activity</u>	<u>VOC (lbs/day)</u>	<u>CO (lbs/day)</u>	<u>NO<sub>x</sub> (lbs/day)</u>	<u>SO<sub>x</sub> (lbs/day)</u>	<u>PM10 (lbs/day)</u>	<u>PM2.5 (lbs/day)</u>
<u>5 facilities each with 3 Construction Worker Vehicles</u>	<u>0.30</u>	<u>2.75</u>	<u>0.25</u>	<u>0.00</u>	<u>0.04</u>	<u>0.03</u>
<u>5 facilities each with 1 delivery truck</u>	<u>0.45</u>	<u>2.90</u>	<u>3.20</u>	<u>0.00</u>	<u>0.13</u>	<u>0.10</u>
<u>PEAK DAILY INCREASE</u>	<u>0.75</u>	<u>5.65</u>	<u>3.45</u>	<u>0.00</u>	<u>0.17</u>	<u>0.13</u>
<u>SIGNIFICANCE THRESHOLD</u>	<u>75</u>	<u>550</u>	<u>100</u>	<u>150</u>	<u>150</u>	<u>55</u>
<u>SIGNIFICANT?</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>

<sup>1</sup> 1 metric ton = 2,205 pounds

**Table 2-8**  
**Estimated GHG Construction Emissions from Installing Monitoring Systems**  
**at 24 Facilities**

<u>Activity</u>	<u>CO<sub>2</sub>eq<sup>1,2</sup></u> <u>(MT/yr)</u>
<u>24 facilities each with 3 Construction Worker Vehicles</u>	<u>0.04</u>
<u>24 facilities each with 1 delivery truck</u>	<u>0.05</u>
<u>TOTAL PROJECT INCREASE</u>	<u>0.09</u>
<u>SIGNIFICANCE THRESHOLD</u>	<u>10,000</u>
<u>SIGNIFICANT?</u>	<u>NO</u>

1 1 metric ton = 2,205 pounds

2 GHGs from temporary construction activities are amortized over 30 years

In conclusion, less than significant adverse operational impacts to air quality and GHGs are expected from a slight increased demand for electricity to operate three electric workover rigs or from a slight increased demand in the use of alternative fuels to operate three alternative fuel workover rigs. In addition, less than significant adverse operational impacts to air quality and GHGs are also expected from operating vacuum trucks and generator sets on a peak day. Finally, less than significant adverse construction impacts to air quality and GHGs are also expected from constructing five monitoring systems on a peak day. Further, since no significant impacts were identified for this issue, no mitigation measures are necessary or required.

**III. c) Less Than Significant Impact.** As the Lead Agency under CEQA, the SCAQMD uses the same significance thresholds for project-specific and cumulative impacts for all environmental topics analyzed. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable; conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant<sup>10</sup>.

With respect to air quality, no cumulative impacts are anticipated from the proposed project. Emissions resulting with implementation of the proposed project will be below the SCAQMD's thresholds for all criteria air pollutants. Although the proposed project may contribute additional air pollutants to an existing nonattainment area, these increases are below the SCAQMD air quality significance criteria. Therefore, the proposed project will not cause a significant environmental effect, nor result in an unavoidable cumulatively considerable contribution to an air quality impact<sup>11</sup>.

Emissions relative to GHG emissions from the proposed project will also be below the SCAQMD's cumulatively considerable significance threshold for GHGs. Thus, no significant adverse impacts are expected, either individually or cumulatively.

<sup>10</sup> SCAQMD Cumulative Impacts Working Group White Paper on Potential Control Strategies to Address Cumulative Impacts From Air Pollution, August 2003, Appendix D, Cumulative Impact Analysis Requirements Pursuant to CEQA, at D-3. <http://www.aqmd.gov/hb/2003/030929a.html>

<sup>11</sup> Refer also to *Citizens for Responsible Equitable Environmental Development v. City of Chula Vista* (2011) 197 Cal. App. 4<sup>th</sup> 327, 334 and *Rialto Citizens for Responsible Growth v. City of Rialto* (2102) 208 Cal. App. 4<sup>th</sup> 899 pertaining to the determination of significant impacts and whether a project is considered to be cumulatively considerable.

Consistent with CEQA Guidelines §15064.7, a “lead agency may rely on a threshold of significance standard to determine whether a project will cause a significant environmental effect.” Further, CEQA Guidelines §15064 (h)(1) requires that a “lead agency consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable.” Where a lead agency is examining a project with an incremental effect that is not cumulatively considerable, a lead agency need not consider the effect significant, but must briefly describe the basis for concluding that the incremental effect is not cumulatively considerable. As stated above, projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable; projects that do not exceed the project-specific significance thresholds are not considered to be cumulatively considerable. Therefore the proposed project’s contribution to air quality and GHGs are not cumulatively considerable, and thus not significant. This conclusion is consistent with CEQA Guidelines §15064 (h)(4), which states, “The mere existence of cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project’s incremental effects are cumulatively considerable.”

**III. d) No-Less Than Significant Impact.** Affected facilities are not expected to increase exposure to sensitive receptors with substantial pollutant concentrations from the implementation of PAR 1148.1 for the following reasons: 1) PAR 1148.1 would not change any of the VOC/TOC/TAC reduction aspects ~~in~~ currently in the rule but instead would improve upon compliance activities in order to minimize the potential for nuisance and odor impacts to local residents and sensitive receptors that are often located nearby from ongoing operations that do not include drilling; 2) the use of non-diesel workover rigs will be required for any facility that is located within 1,500 feet of a sensitive receptor and that is required to prepare and submit for approval an Odor Mitigation Plan in the event that the facility either receives one Rule 402 NOV or three confirmed odor events within six consecutive months; and, 3) the use of non-diesel workover rigs would actually reduce the amount of emissions of criteria pollutants, diesel PM (a TAC) and GHGs for facilities located the closest to sensitive receptors when compared to current baseline emissions from workover rig activities (see Table 2-4). In addition, while the potential increase in the use of vacuum trucks and generator sets rely on diesel fuel for operation, the emission calculations for a peak day as summarized in Table 2-6 show less than significant increases in operational emissions. Similarly, while there may be a need for some facilities to install monitoring equipment, the emission calculations as summarized in Tables 2-7 and 2-8 show less than significant increases in construction emissions.

Therefore, no significant adverse air quality impacts to sensitive receptors are expected from implementing PAR 1148.1. Since no significant impacts were identified for this issue, no mitigation measures are necessary or required.

**III. e) No Impact.** Historically, the SCAQMD has enforced odor nuisance complaints through SCAQMD Rule 402 - Nuisance. Sulfur compounds such as hydrogen sulfide (H<sub>2</sub>S) and mercaptans are the primary sources of odors from existing oil and gas operations. PAR 1148.1 would further assist in minimizing emissions to the atmosphere by improving upon compliance and monitoring requirements to minimize the potential for odors. For example, the use of non-diesel workover rigs will be required for any facility that is located within 1,500 feet of a sensitive receptor and that is required to prepare and submit for approval an Odor Mitigation Plan in the event that the facility either receives one Rule 402 NOV or three confirmed odor events within six consecutive months. Currently, workover rigs operate with diesel fuel which is

required to have a low sulfur content (e.g., 15 ppm by weight or less) in accordance with SCAQMD Rule 431.2 – Sulfur Content of Liquid Fuels. Because the operation of workover rigs, vacuum trucks, and generator sets will occur within the confines of existing affected facilities, sufficient dispersion of diesel emissions over distance generally occurs such that odors associated with diesel emissions may be discernable to offsite receptors, depending on the location of the equipment workover rig and its distance relative to the nearest offsite receptor. Further, the use of construction worker vehicles and delivery trucks as part of construction activities associated with installing monitoring equipment will not be idling at the affected facilities once onsite, so odors from these vehicles would not be expected. However, in the event that an Odor Mitigation Plan is required, implementation of PAR 1148.1 may cause a limited replacement of diesel workover rigs with non-diesel workover rigs, when they become available, such that odors associated with diesel combustion will be reduced from baseline conditions whenever and wherever a non-diesel workover rig is employed. Further, the operation of non-diesel workover rigs is not expected to be a substantial source of odors because non-diesel workover rigs would either rely on electricity or be directly fueled by cleaner, less odorous fuels such as natural gas or propane, when compared to diesel. Finally, in the event that a vacuum truck is required to pump out a well cellar and even if these operations require nighttime lighting necessitating the use of a generator set at an affected facility, an overall improvement in odors would be expected because the need for the pumping out of a well cellar would be triggered because it has been verified as a source of odors. Thus, the proposed project is not expected to create significant adverse objectionable odors. Since no significant impacts were identified for this issue, no mitigation measures are necessary or required.

**III. f) No Impact.** Upon implementation, the proposed project would be required to comply with all applicable SCAQMD, CARB, and USEPA rules and regulations. Thus, the proposed project would not be expected to diminish an existing air quality rule or future compliance requirements. Further, by amending Rule 1148.1 as proposed, the proposed project would enhance existing air pollution control rules that assist the SCAQMD in its efforts to attain and maintain with a margin of safety the state and federal ambient air quality standards for ozone and PM<sub>2.5</sub> because VOCs are considered to be precursor pollutants that contribute to the formation of ozone and PM<sub>2.5</sub>. Accordingly, the proposed project would not diminish any air quality rules or regulations. Since no significant impacts were identified for this issue, no mitigation measures are necessary or required.

**III. g) & h) Less Than Significant Impact.** Changes in global climate patterns have been associated with global warming, an average increase in the temperature of the atmosphere near the Earth's surface, recently attributed to accumulation of GHG emissions in the atmosphere. GHGs trap heat in the atmosphere, which in turn heats the surface of the Earth. Some GHGs occur naturally and are emitted to the atmosphere through natural processes, while others are created and emitted solely through human activities. The emission of GHGs through the combustion of fossil fuels (i.e., fuels containing carbon) in conjunction with other human activities, appears to be closely associated with global warming<sup>12</sup>. State law defines GHG to include the following: carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>) (HSC

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<sup>12</sup> Solomon, S., D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.). 2007. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change, 2007. Cambridge University Press. [http://www.ipcc.ch/publications\\_and\\_data/ar4/wg1/en/contents.html](http://www.ipcc.ch/publications_and_data/ar4/wg1/en/contents.html)



§38505(g)). The most common GHG that results from human activity is CO<sub>2</sub>, followed by CH<sub>4</sub> and N<sub>2</sub>O.

GHGs and other global warming pollutants are perceived as solely global in their impacts in that that increasing emissions anywhere in the world contributes to climate change anywhere in the world. However, this perception may not be completely correct. A study conducted on the health impacts of CO<sub>2</sub> “domes” that form over urban areas concluded that they cause increases in local temperatures and local criteria pollutants, which have adverse health effects<sup>13</sup>.

The analysis of GHGs is a different analysis than the analysis of criteria pollutants for the following reasons. For criteria pollutants, the significance thresholds are based on daily emissions because attainment or non-attainment is primarily based on daily exceedances of applicable ambient air quality standards. Further, several ambient air quality standards are based on relatively short-term exposure effects on human health (e.g., one-hour and eight-hour standards). Since the half-life of CO<sub>2</sub> is approximately 100 years, for example, the effects of GHGs occur over a longer term which means they affect the global climate over a relatively long time frame. As a result, the SCAQMD’s current position is to evaluate the effects of GHGs over a longer timeframe than a single day (e.g., annual emissions). GHG emissions are typically considered to be cumulative impacts because they contribute to global climate effects. GHG emission impacts from implementing the proposed project were calculated at the project-specific level. For example, installation and subsequent operation of compressor and steam ejector technology has the potential to increase the electricity, fuel, and water use which will in turn increase CO<sub>2</sub> emissions.

On December 5, 2008, the SCAQMD adopted an interim CEQA GHG Significance Threshold for projects where SCAQMD is the lead agency (SCAQMD, 2008). This interim threshold is set at 10,000 metric tons (MT) of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>eq) per year. Projects with incremental increases below this threshold will not be cumulatively considerable.

As discussed earlier in Sections b) and c) of this topic area, the analysis shows that there may be a slight reduction in GHG emissions from the combustion of diesel fuel in workover rig engines in the event that an Odor Mitigation Plan requiring the use of a non-diesel workover rig occurs. However, the combustion of natural gas or propane in workover rigs will generate GHG emissions but the GHG emissions generated will be lower because the CO<sub>2</sub>eq emission factors for natural gas and propane are much lower than the CO<sub>2</sub>eq emission factors for diesel. Nonetheless, with a reduction in diesel-fueled workover rigs, a slight, overall reduction in GHG emissions would be expected at any facility that would be required to have an Odor Mitigation Plan and to utilize a non-diesel workover rig as part of plan implementation.

Specifically, as summarized in Table 2-4, the utilization of up to three non-diesel workover rigs would reduce GHGs generated from diesel combustion by approximately 178 MT/yr of CO<sub>2</sub>eq emissions when compared to the existing setting. As shown in Table 2-5, this decrease would be offset by slight increases in GHGs from utilizing alternative fuels in three workover rigs by the following amounts: 0.15 MT/yr CO<sub>2</sub>eq for LNG fuel; 0.50 MT/yr CO<sub>2</sub>eq for CNG fuel; and, 0.18 MT/yr CO<sub>2</sub>eq for LPG fuel. Thus, despite these slight increases, overall a net reduction in

<sup>13</sup> Jacobsen, Mark Z. “Enhancement of Local Air Pollution by Urban CO<sub>2</sub> Domes,” Environmental Science and Technology, as describe in Stanford University press release on March 16, 2010 available at: <http://news.stanford.edu/news/2010/march/urban-carbon-domes-031610.html>.

GHG emissions would be expected from utilizing alternative fuel workover rigs in lieu of diesel fuel workover rigs.

The analysis mainly focuses on directly emitted CO<sub>2</sub> because this is the primary GHG pollutant emitted during the combustion process and is the GHG pollutant for which emission factors are most readily available. CO<sub>2</sub>eq data derived from CO<sub>2</sub> emissions reported specific to workover rigs was provided by CARB. In addition, CH<sub>4</sub> and N<sub>2</sub>O emissions were also estimated and included in the overall GHG calculations. No other GHGs are expected to be emitted because the proposed project does not affect equipment or operations that have the potential to emit other non-fuel combustion generated GHGs such as SF<sub>6</sub>, HFCs or PFCs. Appendix B contains the spreadsheets for the proposed project with the results based on the assumptions used by the SCAQMD staff for this analysis.

While implementing the proposed project could potentially achieve a reduction in GHG emissions for any facility that becomes subject to an Odor Mitigation Plan, in the event that more than three non-diesel workover rigs are employed due to multiple Odor Mitigation Plans, there potentially could be more GHG reductions. In the event that vacuum trucks and generator sets are needed to pump out well cellars that have been verified as a source of odors, the GHG emission calculations during operation, as summarized in Table 2-6, show a very slight, less than significant increase of 0.30 MT/year of GHGs. Further, as summarized in Table 2-8, if 24 facilities have monitoring systems installed, the amortized GHG emission calculations for construction show a less than significant increase of 0.09 MT/year of GHGs. Lastly, PAR 1148.1 is not subject to a GHG reduction plan. Thus, implementation of PAR 1148.1 would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions.

Thus, as shown in Tables 2-5, 2-6, and 2-8 the SCAQMD's GHG significance threshold for industrial sources will not be exceeded. For this reason, implementing the proposed project is not expected to generate significant adverse cumulative GHG air quality impacts.

### **Conclusion**

Based upon these considerations, significant air quality and GHG emissions impacts are not expected from implementing PAR 1148.1. Since no significant air quality and GHG emissions impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>IV. BIOLOGICAL RESOURCES.</b>				
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by §404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflicting with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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## Significance Criteria

Impacts on biological resources will be considered significant if any of the following criteria apply:

- The project results in a loss of plant communities or animal habitat considered to be rare, threatened or endangered by federal, state or local agencies.
- The project interferes substantially with the movement of any resident or migratory wildlife species.
- The project adversely affects aquatic communities through construction or operation of the project.

## Discussion

**IV. a), b), c), & d) No Impact.** PAR 1148.1 would only affect compliance activities at existing oil and gas production facilities which have already been greatly disturbed. In general, these areas currently do not typically support riparian habitat, federally protected wetlands, or migratory corridors. Additionally, special status plants, animals, or natural communities are not expected to be found in close proximity to the affected facilities. Areas immediately around the oil and gas production wells subject to PAR 1148.1 are expected to be devoid of all biological activity for safety and fire prevention reasons. Therefore, the proposed project would have no direct or indirect impacts that could adversely affect plant or animal species or the habitats on which they rely in the SCAQMD's jurisdiction. The current and expected future land use development to accommodate population growth is primarily due to economic considerations or local government planning decisions. A conclusion in the Program Environmental Impact Report (EIR) for the 2012 AQMP was that population growth in the region would have greater adverse effects on plant species and wildlife dispersal or migration corridors in the basin than SCAQMD regulatory activities, (e.g., air quality control measures or regulations). The current and expected future land use development to accommodate population growth is primarily due to economic considerations or local government planning decisions.

**IV. e) & f) No Impact.** The proposed project is not envisioned to conflict with local policies or ordinances protecting biological resources or local, regional, or state conservation plans. Land use and other planning considerations are determined by local governments and no land use or planning requirements would be altered by the proposed project. Additionally, the proposed project would not conflict with any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or any other relevant habitat conservation plan, and would not create divisions in any existing communities because all activities associated with complying with the proposed project would occur at existing facilities in previously disturbed areas which are not typically subject to Habitat or Natural Community Conservation Plans.

The SCAQMD, as the Lead Agency for the proposed project, has found that, when considering the record as a whole, there is no evidence that the proposed project would have potential for any new adverse effects on wildlife resources or the habitat upon which wildlife depends. Accordingly, based upon the preceding information, the SCAQMD has, on the basis of substantial evidence, rebutted the presumption of adverse effect contained in §753.5 (d), Title 14 of the California Code of Regulations.

Based upon these considerations, significant biological resource impacts are not expected from implementing PAR 1148.1, and thus, this topic will not be further analyzed. Since no significant biological resource impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>V. CULTURAL RESOURCES.</b> Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource, site, or feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Impacts to cultural resources will be considered significant if:

- The project results in the disturbance of a significant prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group.
- Unique paleontological resources are present that could be disturbed by construction of the proposed project.
- The project would disturb human remains.

**Discussion**

**V. a) No Impact.** There are existing laws in place that are designed to protect and mitigate potential impacts to cultural resources. For example, CEQA Guidelines state that generally, a resource shall be considered "historically significant" if the resource meets the criteria for listing in the California Register of Historical Resources, which include the following:

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- Is associated with the lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values;

- Has yielded or may be likely to yield information important in prehistory or history (CEQA Guidelines §15064.5).

Buildings, structures, and other potential culturally significant resources that are less than 50 years old are generally excluded from listing in the National Register of Historic Places, unless they are shown to be exceptionally important. Even if there are any oil and gas wells that are older than 50 years, they would not be considered historically significant since they would not have any of the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values. Further, since PAR 1148.1 is focused mainly on improving compliance to minimize odors at oil and gas production facilities, the proposed project would not require any facility modifications that would adversely impact any existing structures that would be considered historically significant, that have contributed to California history, or that pose high artistic values. Therefore, the proposed project is not expected to cause any impacts to significant historic cultural resources.

**V. b), c), & d) No Impact.** PAR 1148.1 would only affect compliance activities at existing oil and gas production facilities which have already been greatly disturbed due to existing oil and gas drilling activities at each affected facility. As such, PAR 1148.1 would not require the construction of new buildings or structures, increasing the floor space of existing buildings or structures, or any other construction activities that would require disturbing soil that may contain cultural resources. Further, because the compliance activities are expected to be confined within the existing footprint of these affected facilities, the proposed project is not expected to require physical changes to the environment which may disturb paleontological or archaeological resources. Furthermore, it is envisioned that these areas are already either devoid of significant cultural resources or whose cultural resources have been previously disturbed. Therefore, the proposed project has no potential to cause a substantial adverse change to a historical or archaeological resource, directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, or disturb any human remains, including those interred outside a formal cemeteries. The proposed project is, therefore, not anticipated to result in any activities or promote any programs that could have a significant adverse impact on cultural resources in the district.

Based upon these considerations, significant adverse cultural resources impacts are not expected from implementing PAR 1148.1, and thus, this topic will not be further analyzed. Since no significant cultural resources impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>VI. ENERGY.</b> Would the project:				
a) Conflict with adopted energy conservation plans?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
b) Result in the need for new or substantially altered power or natural gas utility systems?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Create any significant effects on local or regional energy supplies and on requirements for additional energy?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create any significant effects on peak and base period demands for electricity and other forms of energy?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with existing energy standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Significance Criteria

Impacts to energy ~~and mineral~~ resources will be considered significant if any of the following criteria are met:

- The project conflicts with adopted energy conservation plans or standards.
- The project results in substantial depletion of existing energy resource supplies.
- An increase in demand for utilities impacts the current capacities of the electric and natural gas utilities.
- The project uses non-renewable resources in a wasteful and/or inefficient manner.

### Discussion

**VI. a) & e) No Impact.** The proposed project is not subject to any existing energy conservation plans. For any facility that is subject to PAR 1148.1 and is also subject to an energy conservation plan, it is not expected that the proposed project would affect in any way or interfere with a facility's ability to comply with its energy conservation plan or energy standards. In addition, energy information, as it relates to the replacement of diesel workover rigs with non-diesel workover rigs operating at any facility that would be required to have an Odor Mitigation Plan, was derived as part of the air quality analysis in this chapter and is summarized in the following discussion in sections b), c) and d). The following sections conclude that the amount of energy that may be needed to accommodate non-diesel workover rig operations as part of an Odor Mitigation Plan, to operate vacuum trucks and generator sets, and to install monitoring systems at affected facilities would be less than significant. Further, since non-diesel workover rig technology does not currently exist, it is expected that when this technology is developed and becomes commercially available, the technology would be designed to comply with all applicable existing energy standards. Thus, the proposed project would not utilize non-renewable energy resources in a wasteful or inefficient manner.

**VI. b), c) & d) Less Than Significant Impact.** As previously explained in Section III. b) & c), in the event that a facility is required to prepare and obtain approval of an Odor Mitigation Plan, the facility operator would be required to utilize a workover rig that is either electrically powered or fueled by LNG, CNG or LPG, in lieu of diesel fuel, if available and feasible. According to CARB's database, each workover rig consumes approximately 12,600 gallons of diesel per year for 3,000 hours of operation. Thus, if three diesel-fueled workover rigs are replaced with three non-diesel workover rigs at the three facilities that would be subject to an Odor Mitigation Plan, then a small reduction in the amount of diesel fuel needed (e.g., approximately 37,800 gallons per year) to operate these workover rigs would be expected. In addition, a slight reduction in the demand for diesel fuel will reduce the number of trucks per year delivering diesel fuel by five truck trips. Five diesel delivery trucks per year would utilize approximately 1,087 gallons of diesel fuel. Thus, the total amount of diesel fuel that would no longer be utilized if three diesel workover rigs are replaced with non-diesel workover rigs is approximately 38,897 gallons per year. Since there would be no increase in the amount of diesel fuel consumed, a reduction in the amount of diesel fuel would not be considered a significant adverse energy impact. In addition, if three electric workover rigs replace three diesel-fueled workover rigs, a slight increase in electricity would be needed but the increase would not exceed the significance threshold of one percent of electricity supply. Table 2-96 summarizes the estimated electricity usage in the event that three electric workover rigs replace three diesel-fueled workover rigs.

**Table 2-96**  
**Electricity Usage Summary**

No. of Electric Workover Rigs	Instantaneous Electricity Usage (MW)	Significance Threshold: 1% of supply (MW)	Percent Increase (%)	Significant?
3	0.0003	8,362	0%	NO

The decrease in the amount of diesel fuel demand would be offset by an increase in the use of LNG, CNG or LPG depending on the type of non-diesel workover rig employed. As previously analyzed in Section III b) and c), if three diesel-fueled workover rigs are replaced with three alternative fuel workover rigs, the total demand would be approximately 21,092 gallons per year of LNG, or 27,556 therms per year of CNG, or 24,683 gallons per year of LPG as compared to a reduction in the use of diesel fuel by 37,600 gallons. In order to determine peak impacts for a worst-case analysis, Table 2-107 summarizes the estimated alternative fuel usage in the event that three diesel workover rigs are replaced by three workover rigs fueled by 100 percent of either LNG, CNG or LPG. None of the increased use of alternative fuels individually or cumulatively would exceed the significance threshold of one percent of supply. The energy calculations are shown in Appendix B of this [Final Draft EA](#).



**Table 2-107**  
**Total Projected Alternative Fuel Use**

Fuel Type	Total Energy Usage per Type of Alternative Fuel		
	LNG	CNG	LPG
Projected Annual Use	21,092 gallons = 0.003 MMcf <sup>a</sup>	27,556 therms = 2.76 MMcf <sup>b</sup>	24,683 gallons
Threshold Fuel Supply	9,330 MMcf <sup>c</sup>	9,330 MMcf <sup>c</sup>	25 MMgallons <sup>d</sup>
% of Fuel Supply	0 %	0.03%	0.1%
Significant (Yes/No) <sup>e</sup>	NO	NO	NO

<sup>a</sup> 1 cubic foot (cf) = 0.000001 million cubic feet (MMcf) = 7.481 gallons

<sup>b</sup> 1 therm = 100 cubic feet (cf) = 0.0001 million cubic feet (MMcf)

<sup>c</sup> Natural Gas Infrastructure Draft Staff Paper, California Energy Commission, May 2009 (CEC-200-2009-004-SD). <http://www.energy.ca.gov/2009publications/CEC-200-2009-004/CEC-200-2009-004-SD.PDF>

<sup>d</sup> Retail Fuel Report and Data for California, California Energy Commission, August 2014.

[http://energyalmanac.ca.gov/gasoline/piira\\_retail\\_survey.html](http://energyalmanac.ca.gov/gasoline/piira_retail_survey.html)

<sup>e</sup> SCAQMD's Energy Threshold for both Fuel Use is 1% of Supply.

In the event that vacuum trucks and generator sets are needed to pump out well cellars that have been verified as a source of odors, the additional diesel fuel needed to operate this equipment is approximately 47 gallons per year. Further, if affected facilities install monitoring systems, approximately 200 gallons of diesel fuel and 108 gallons of gasoline would be needed to operate delivery haul trucks and construction worker vehicles during construction. Table 2-11 summarizes the estimated increase in diesel fuel and gasoline usage from these activities.

**Table 2-11**  
**Total Projected Fuel Use From Vacuum Trucks, Generator Sets, Delivery Trucks, and Construction Worker Vehicles**

Fuel Type	Diesel	Gasoline
<u>Projected Use</u>	<u>47 gallons/year plus 200 gallons/project</u>	<u>108 gallons/project</u>
<u>Threshold Fuel Supply<sup>a</sup></u>	<u>1,587,000,000 gallons</u>	<u>6,579,000,000 gallons</u>
<u>% of Fuel Supply</u>	<u>0 %</u>	<u>0 %</u>
<u>Significant (Yes/No)<sup>b</sup></u>	<u>NO</u>	<u>NO</u>

<sup>a</sup> [2012 California Retail Sales by County; California Energy Commission](http://energyalmanac.ca.gov/gasoline/retail_fuel_outlet_survey/retail_diesel_sales_by_county.html)

[http://energyalmanac.ca.gov/gasoline/retail\\_fuel\\_outlet\\_survey/retail\\_diesel\\_sales\\_by\\_county.html](http://energyalmanac.ca.gov/gasoline/retail_fuel_outlet_survey/retail_diesel_sales_by_county.html)

[http://energyalmanac.ca.gov/gasoline/retail\\_fuel\\_outlet\\_survey/retail\\_gasoline\\_sales\\_by\\_county.html](http://energyalmanac.ca.gov/gasoline/retail_fuel_outlet_survey/retail_gasoline_sales_by_county.html)

<sup>b</sup> [SCAQMD's Energy Threshold for both Fuel Use is 1% of Supply.](#)

As shown in Table 2-11, the increased use of diesel fuel and gasoline would not exceed the significance threshold of one percent of supply. Since the proposed project would not exceed the SCAQMD's energy threshold of one percent of supply for electricity, ~~and~~ alternative fuel, diesel fuel and gasoline usage, implementation of PAR 1148.1 is expected to have less than significant energy impacts.

Based upon these considerations, significant energy impacts are not expected from implementing PAR 1148.1. Since no significant energy impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>VII. GEOLOGY AND SOILS.</b> Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Significance Criteria

Impacts on the geological environment will be considered significant if any of the following criteria apply:

- Topographic alterations would result in significant changes, disruptions, displacement, excavation, compaction or over covering of large amounts of soil.
- Unique geological resources (paleontological resources or unique outcrops) are present that could be disturbed by the construction of the proposed project.
- Exposure of people or structures to major geologic hazards such as earthquake surface rupture, ground shaking, liquefaction or landslides.
- Secondary seismic effects could occur which could damage facility structures, e.g., liquefaction.
- Other geological hazards exist which could adversely affect the facility, e.g., landslides, mudslides.

## Discussion

**VII. a) No Impact.** Other than the possible replacement of three diesel-fueled workover rigs with three non-diesel workover rigs, the use of vacuum trucks and generator sets for well cellar clean out, or the operation of construction worker vehicles and delivery trucks during monitoring equipment installation, no substantial physical modifications to buildings or structures are expected to occur as a result of implementing PAR 1148.1. Since workover rigs, vacuum trucks, construction worker vehicles, and delivery trucks are mobile sources that can be driven on-road and generator sets are off-road equipment, any replacement of diesel-fueled workover rigs with non-diesel workover rigs, the use of vacuum trucks and generator sets, the use of construction worker vehicles and delivery trucks would be a matter of logistics to either schedule the switch out, use the equipment, or schedule the installation of monitoring equipment at an affected facility. Thus, no heavy-duty diesel-fueled construction equipment would be required and no soils would be disturbed. Therefore, the replacement of diesel-fueled workover rigs with non-diesel workover rigs, the use of vacuum trucks and generator sets, or the use of construction worker vehicles and delivery trucks is not expected to affect geology or soils, or existing geophysical conditions at the affected facilities.

Southern California is an area of known seismic activity. Structures must be designed to comply with the Uniform Building Code Zone 4 requirements if they are located in a seismically active area. The local city or county is responsible for assuring that the existing affected facilities comply with the Uniform Building Code as part of the issuance of the building permits and can conduct inspections to ensure compliance. The Uniform Building Code is considered to be a standard safeguard against major structural failures and loss of life. The goal of the code is to provide structures that will: 1) resist minor earthquakes without damage; 2) resist moderate earthquakes without structural damage but with some non-structural damage; and, 3) resist major earthquakes without collapse but with some structural and non-structural damage.

The Uniform Building Code is considered to be a standard safeguard against major structural failures and loss of life. The Uniform Building Code bases seismic design on minimum lateral seismic forces (“ground shaking”). The Uniform Building Code requirements operate on the

principle that providing appropriate foundations, among other aspects, helps to protect buildings from failure during earthquakes. The basic formulas used for the Uniform Building Code seismic design require determination of the seismic zone and site coefficient, which represent the foundation conditions at the site. The Uniform Building Code requirements also consider liquefaction potential and establish stringent requirements for building foundations in areas potentially subject to liquefaction.

Accordingly, existing buildings and equipment at existing affected facilities are likely to conform to the Uniform Building Code and all other applicable state codes in effect at the time they were constructed. Further, as with the current use of diesel workover rigs, the use of non-diesel workover rigs at existing affected facilities to comply with the proposed project would also be expected to conform to the Uniform Building Code and all other applicable state and local building codes.

Thus, since implementation of PAR 1148.1 would be expected to affect operations at existing facilities and would not involve any additional drilling, digging or construction, the proposed project would not alter the exposure of people or property to geological hazards such as earthquakes, landslides, mudslides, ground failure, or other natural hazards. As a result, substantial exposure of people or structures to the risk of loss, injury, or death involving the rupture of an earthquake fault, seismic ground shaking, ground failure or landslides is not anticipated and will not be further analyzed.

**VII. b) No Impact.** Other than the possible replacement of three diesel-fueled workover rigs with three-non-diesel workover rigs, the use of vacuum trucks and generator sets, or the use of construction worker vehicles and delivery trucks as part of installing monitoring equipment, no physical modifications to buildings or structures are expected to occur as a result of implementing PAR 1148.1. Since workover rigs, vacuum trucks, construction worker vehicles, and delivery trucks are mobile sources that can be driven on-road and generator sets are off-road equipment, any replacement of diesel-fueled workover rigs with non-diesel workover rigs would be a matter of logistics to schedule the switch out, the use of vacuum trucks and generator sets during well cellar pump out, or the installation of monitoring equipment at an affected facility. Since the existing facilities are generally flat and have previously been graded and paved, no excavating or grading activities would be needed and no temporary erosion would be expected as part of implementing PAR 1148.1.

Further, wind erosion is not expected to occur to any appreciable extent, because operators of the affected facilities would be required to comply with the best available control measure (BACM) requirements of SCAQMD Rule 403 – Fugitive Dust. In general, operators must control fugitive dust through a number of soil stabilizing measures such as watering the site, using chemical soil stabilizers, revegetating inactive sites, et cetera. The proposed project would not change how operators currently comply with these requirements. Thus, since implementation of PAR 1148.1 would be expected to affect operations at existing facilities and would not involve any additional drilling, digging or construction, no unstable earth conditions or changes in geologic substructures are expected to result from implementing the proposed project.

**VII. c) No Impact.** As explained in Section VII. b), since no excavation, grading, or filling activities would occur at affected facilities, PAR 1148.1 would not be expected to affect the soil types present at the affected facilities in a way that would cause them to be further susceptible to

expansion or liquefaction. For the same reasons, subsidence is also not anticipated to be a problem. Further, the proposed project would not cause any new drilling or the removal of underground products (e.g., water, crude oil, et cetera) that could produce subsidence effects. While the affected facilities engage in drilling, the proposed project (e.g., amending Rule 1148.1) will not increase drilling. Additionally, the affected areas are not envisioned to be prone to landslides or have unique geologic features since the affected industrial facilities are located in areas that have been previously disturbed and where such features have already been altered or removed.

Finally, since implementation of PAR 1148.1 would be expected to affect operations at existing facilities and would not involve any additional drilling, digging or construction, the proposed project would not be expected to alter or make worse any existing potential for subsidence, liquefaction, et cetera.

**VII. d) & e) No Impact.** Since the proposed project would affect compliance activities at existing oil and gas facilities, it is expected that people or property would not be exposed to new impacts related to expansive soils or soils incapable of supporting water disposal. Further, typically each affected facility has some degree of existing wastewater treatment systems that would continue to be used and would be expected to be unaffected by the proposed project. Sewer systems are available to handle wastewater produced and treated by each affected facility. Each existing facility affected by the proposed project would not require installation of septic tanks or alternative wastewater disposal systems. As a result, the proposed project would not require facility operators to utilize or install new or modify existing septic systems or alternative wastewater disposal systems. Thus, since implementation of PAR 1148.1 would be expected to affect operations at existing facilities and would not involve any additional drilling, digging or construction, implementation of the proposed project would not adversely affect soils associated with a septic system or alternative wastewater disposal system.

Based upon these considerations, significant geology and soils impacts are not expected from implementing PAR 1148.1, and thus, this topic will not be further analyzed. Since no significant geology and soils impacts were identified, no mitigation measures are necessary or required.

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	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>VIII. HAZARDS AND HAZARDOUS MATERIALS.</b> Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, and disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public use airport or a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Significantly increased fire hazard in areas with flammable materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Significance Criteria

Impacts associated with hazards will be considered significant if any of the following occur:

- Non-compliance with any applicable design code or regulation.

- Non-conformance to National Fire Protection Association standards.
- Non-conformance to regulations or generally accepted industry practices related to operating policy and procedures concerning the design, construction, security, leak detection, spill containment or fire protection.
- Exposure to hazardous chemicals in concentrations equal to or greater than the Emergency Response Planning Guideline (ERPG) 2 levels.

## Discussion

**VIII. a), & b) Less Than Significant Impact.** PAR 1148.1 would not introduce, require, or change the amount of hazardous materials: 1) routinely transported to or from the oil and gas facilities; 2) processed by the oil and gas facilities; and, 3) disposed of as hazardous waste by the oil and gas facilities. However, PAR 1148.1 may have the effect of reducing odorous emissions vented to the atmosphere, which include HAPs such as H<sub>2</sub>S, via the enhanced compliance requirements. While the reduction of H<sub>2</sub>S vented to the atmosphere would be beneficial for air quality and odor, because H<sub>2</sub>S is also explosive, a reduction in H<sub>2</sub>S emissions would lessen the current explosion hazards associated with operation activities at oil and gas facilities.

**VIII. c) & e) No Impact.** Compliance activities from implementing the proposed project are expected to occur within the existing confines of the affected facilities. However, some of these facilities may be located within one-quarter mile of a sensitive receptor (e.g., a school) or in close proximity to a public/private airport and are located within an airport land use plan. Nonetheless, the replacement of diesel-fueled workover rigs with non-diesel workover rigs at facilities that would be subject to an Odor Mitigation Plan, would not cause the height of the required workover rig to change since the height of the workover rig is dependent on the depth of the oil or gas well to be serviced. Similarly, oil and gas facilities currently use vacuum trucks and generator sets with low heights, so the slight increase in use of these equipment, would not alter the height profiles of these equipment. Further, the height of construction worker vehicles and delivery trucks needed for the purpose of installing monitoring equipment at affected facilities is not expected to be any taller than vehicles currently in use throughout the district. Thus, implementation of PAR 1148.1 would not interfere with plane flight paths consistent with Federal Aviation Regulation, Part 77. Such codes are designed to protect the public from hazards associated with normal operation.

Further, operation of workover rigs, vacuum trucks and generator sets at oil and gas facilities would be required to comply with all appropriate building, land use and fire codes. Finally, the implementation of PAR 1148.1 is not expected to generate significant adverse new hazardous emissions in general (see the discussions under Section III) or increase the manufacture or use of hazardous materials (see discussion VIII. a) & b) above).

Since PAR 1148.1 would not create any new hazards or increase existing hazards above the existing baseline, no significant impacts from use and potential accidental release of acutely hazardous materials, substances and wastes near sensitive receptors and public/private airports are expected to occur. Therefore, the proposed project would not be expected to result in a safety hazard for people residing or working in the area of the affected facilities even within the vicinity of a sensitive receptor or airport. Thus, PAR 1148.1 is not expected to increase or create

any new safety hazards to people working or residing in the vicinity of public/private airports or within one-quarter mile of an existing or proposed school.

**VIII. d) No Impact.** Government Code §65962.5 typically refers to a list of facilities that may be subject to Resource Conservation and Recovery Act (RCRA) permits. Since PAR 1148.1 would improve compliance activities applies to oil and gas activities, PAR 1148.1 is not expected to have direct impacts on facilities affected by Government Code §65962.5. However, if affected facilities are subject to Government Code §65962.5, they would still need to comply with any regulations relating to that code section. The replacement of diesel-fueled worker rigs with non-diesel workover rigs is not expected to generate increased hazardous waste above the existing baseline or interfere with existing hazardous waste management programs. Further, because the use of additional vacuum trucks and generator sets would merely expedite the removal of odorous materials from any well cellar identified as a verified odor source, no increases in the amount of hazardous waste collected and disposed of would be expected to occur. Accordingly, PAR 1148.1 is not expected to result in a new significant impact to the public or environment from sites on lists compiled pursuant to Government Code §65962.5.

Lastly, if any of the affected facilities are designated pursuant to Government Code §65962.5 as a large quantity generator of hazardous waste, complying with PAR 1148.1 would not alter in any way how the affected facilities manage their hazardous wastes. Further, they would be expected to continue to manage any and all hazardous materials and hazardous waste in accordance with all applicable federal, state, and local rules and regulations.

**VIII. f) No Impact.** Health and Safety Code §25506 specifically requires all businesses handling hazardous materials to submit a business emergency response plan to assist local administering agencies in the emergency release or threatened release of a hazardous material. Business emergency response plans generally require the following:

- Identification of individuals who are responsible for various actions, including reporting, assisting emergency response personnel and establishing an emergency response team;
- Procedures to notify the administering agency, the appropriate local emergency rescue personnel, and the California Office of Emergency Services;
- Procedures to mitigate a release or threatened release to minimize any potential harm or damage to persons, property or the environment;
- Procedures to notify the necessary persons who can respond to an emergency within the facility;
- Details of evacuation plans and procedures;
- Descriptions of the emergency equipment available in the facility;
- Identification of local emergency medical assistance; and,
- Training (initial and refresher) programs for employees in:
  1. The safe handling of hazardous materials used by the business;
  2. Methods of working with the local public emergency response agencies;



3. The use of emergency response resources under control of the handler;
4. Other procedures and resources that will increase public safety and prevent or mitigate a release of hazardous materials.

In general, every county or city and all facilities using a minimum amount of hazardous materials are required to formulate detailed contingency plans to eliminate, or at least minimize, the possibility and effect of fires, explosion, or spills. In conjunction with the California Office of Emergency Services, local jurisdictions have enacted ordinances that set standards for area and business emergency response plans. These requirements include immediate notification, mitigation of an actual or threatened release of a hazardous material, and evacuation of the emergency area.

Emergency response plans are typically prepared in coordination with the local city or county emergency plans to ensure the safety of not only the public (surrounding local communities), but the facility employees as well. The proposed project would not impair implementation of, or physically interfere with any adopted emergency response plan or emergency evacuation plan. The existing facilities affected by the proposed project would typically already have their own emergency response plans in place and implementation of PAR 1148.1 would not be expected to require an update to any affected facility's emergency response plan. Thus, the proposed project is not expected to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. As such, this impact issue will not be further analyzed.

**VIII. g) No Impact.** The proposed project is not expected to increase the existing risk of fire hazards in areas with flammable brush, grass, or trees since the affected oil and gas facilities are located at on existing industrial sites in urban areas where wildlands are not prevalent. In addition, no substantial or native vegetation typically exists on or near the affected facilities (specifically because they could be a fire hazard) so the proposed project is not expected to expose people or structures to wild fires. Thus, risk of loss or injury associated with wildland fires is not expected.

**VIII. h) Less Than Significant Impact.** The Uniform Fire Code and California Building Code set standards intended to minimize risks from flammable or otherwise hazardous materials. Local jurisdictions are required to adopt the uniform codes or comparable regulations. Local fire agencies require permits for the use or storage of hazardous materials and permit modifications for proposed increases in their use. Permit conditions depend on the type and quantity of the hazardous materials at the facility. Permit conditions may include, but are not limited to, specifications for sprinkler systems, electrical systems, ventilation, and containment. The fire departments make annual business inspections to ensure compliance with permit conditions and other appropriate regulations.

Further, because businesses are required to report increases in the storage or use of flammable and otherwise hazardous materials, including any increased storage of alternative fuels such as LNG, CNG or LPG as part of utilizing alternative fuel workover rigs, to local fire departments. Local fire departments ensure that adequate permit conditions are in place to protect against potential risk of upset. Also, because the projected increase in diesel fuel needed to supply the vacuum trucks, generator sets, and delivery trucks is so small (e.g., 47 gallons per year for the vacuum trucks plus 200 gallons per project for the delivery trucks), increased on-site storage of

diesel fuel will not be needed as existing storage capacities should be sufficient. Similarly, because the projected increase in gasoline that will be needed to operate construction worker vehicles as part of installing monitoring equipment at affected facilities is also small (e.g., 108 gallons per project), increased on-site storage of gasoline will not be needed as this supply can be provided by existing gasoline fueling facilities.

As mentioned in the earlier discussion for section VIII a) & b), PAR 1148.1 may have the effect of reducing the amount of H<sub>2</sub>S vented to the atmosphere. Because H<sub>2</sub>S is explosive, a reduction in H<sub>2</sub>S emissions would lessen the current explosion hazards associated with the operation activities at oil and gas facilities. Thus, PAR 1148.1 may improve the existing fire risk of existing oil and gas operations.

Based upon the above considerations, significant hazards and hazardous materials impacts are not expected from implementing PAR 1148.1. Since no significant hazards and hazardous materials impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>IX. HYDROLOGY AND WATER QUALITY.</b> Would the project:				
a) Violate any water quality standards, waste discharge requirements, exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board, or otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
c) Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in substantial erosion or siltation on- or off-site or flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Place housing or other structures within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam, or inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Require or result in the construction of new water or wastewater treatment facilities or new storm water drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
i) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Potential impacts on water resources will be considered significant if any of the following criteria apply:

Water Demand:

- The existing water supply does not have the capacity to meet the increased demands of the project, or the project would use more than 262,820 gallons per day of potable water.
- The project increases demand for total water by more than five million gallons per day.

Water Quality:

- The project will cause degradation or depletion of ground water resources substantially affecting current or future uses.
- The project will cause the degradation of surface water substantially affecting current or future uses.
- The project will result in a violation of National Pollutant Discharge Elimination System (NPDES) permit requirements.
- The capacities of existing or proposed wastewater treatment facilities and the sanitary sewer system are not sufficient to meet the needs of the project.
- The project results in substantial increases in the area of impervious surfaces, such that interference with groundwater recharge efforts occurs.
- The project results in alterations to the course or flow of floodwaters.

**Discussion**

**IX. a), b), c), d), g), h) & i) No Impact.** PAR 1148.1 neither requires construction of new facilities nor requires physical modifications at existing facilities that would entail construction activities that would require water for dust mitigation. Instead, PAR 1148.1 would enhance monitoring and recordkeeping requirements for facilities subject to the rule. In the event that a facility is required to prepare and obtain approval of an Odor Mitigation Plan, the facility operator would be required to utilize a non-diesel workover rig, in lieu of a diesel-fueled

workover rig, if available and feasible. In addition, in the event of a well cellar that has been identified as a verified odor source that requires same day pump out, the facility operator would also be required to utilize a vacuum truck and if pump out is required during nighttime, a generator set to supply electricity to lights, if existing lighting is insufficient.

Since diesel-fueled workover rigs do not utilize water, non-diesel workover rigs would also be expected to not need water for their operation. Similarly, vacuum trucks and generator sets also do not need water for their operation. Thus, swapping out a diesel-fueled workover rig with a non-diesel workover rig at an affected facility subject to an Odor Mitigation Plan or utilizing a vacuum truck and generator set would not create an additional water demand and would not generate wastewater from simply complying with PAR 1148.1. Because PAR 1148.1 has no provision that would increase demand for water or increase the generation of wastewater, the proposed project would not require the construction of additional water resource facilities, increase the need for new or expanded water entitlements, or alter existing drainage patterns. For these same reasons the proposed project would not substantially deplete groundwater supplies. Consequently, the proposed project is not expected to interfere substantially with groundwater recharge. Therefore, no water demand impacts are expected as the result of implementing PAR 1148.1.

Further, PAR 1148.1 would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Since compliance with PAR 1148.1 does not involve water that would generate wastewater processes, there would be no change in the composition or volume of existing wastewater streams from the affected facilities. Thus, PAR 1148.1 is not expected to require additional wastewater disposal capacity, violate any water quality standard or wastewater discharge requirements, or otherwise substantially degrade water quality.

Since PAR 1148.1 project is not expected to generate significant adverse water quality impacts, no changes to existing wastewater treatment permits, for those facilities that have them, are expected to be necessary. As a result, it is expected that operators of affected facilities would continue to comply with existing wastewater treatment requirements of the applicable Regional Water Quality Control Boards or sanitation districts.

**IX. e) No Impact.** Once implemented, PAR 1148.1 is not expected to require additional workers at affected facilities. Further, the proposed project is not expected to involve construction activities and does not include the construction of any new housing so it would not place new housing in 100-year flood areas as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood delineation map. It is likely that most affected facilities are not located within a 100-year flood hazard area. Any affected facilities that may be located in a 100-year flood area could impede or redirect 100-year flood flows, but this would be considered part of the existing setting and not an effect of the proposed project. Since the proposed project would not require locating new facilities within a flood zone, it is not expected that implementation of the proposed project would expose people or property to any new known water-related flood hazards. As a result, PAR 1148.1 is not expected to expose people or structures to significant flooding risks. Accordingly, this impact issue will not be further evaluated in this Final Draft EA.

**IX. f) No Impact.** The proposed project does not require construction of new facilities in areas that could be affected by tsunamis. Of the oil and gas facilities affected by the proposed project, some are located near the Ports of Long Beach, Los Angeles, and San Pedro. The port areas are protected from tsunamis by the construction of breakwaters. Construction of breakwaters combined with the distance of each facility from the water is expected to minimize the potential impacts of a tsunami or seiche so that no significant impacts are expected. The proposed project does not require construction of facilities in areas that are susceptible to mudflows (e.g., hillside or slope areas). Existing affected facilities that are currently located on hillsides or slope areas may be susceptible to mudflow, but this would be considered part of the existing setting. As a result, the proposed project is not expected to generate significant adverse mudflow impacts. Finally, PAR 1148.1 will not affect in any way any potential flood hazards inundation by seiche, tsunami, or mud flow that may already exist relative to existing facilities. Accordingly, this impact issue will not be further evaluated in this ~~Final Draft~~ EA.

Based upon the aforementioned considerations, significant hydrology and water quality impacts are not expected from implementing PAR 1148.1. Since no significant hydrology and water quality impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>X. LAND USE AND PLANNING.</b>				
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Land use and planning impacts will be considered significant if the project conflicts with the land use and zoning designations established by local jurisdictions.

**Discussion**

**X. a) No Impact.** The proposed project would not require the construction of new facilities at new locations, but any physical effects (e.g., the swapping of some diesel-fueled workover rigs with non-diesel workover rigs) that will result from the proposed project, would occur at existing oil and gas facilities and would not be expected to go beyond existing boundaries. Thus,

implementing the proposed project would not result in physically dividing any established communities.

**X. b) No Impact.** There are no provisions in the proposed project that would affect land use plans, policies, or regulations. Land use and other planning considerations are determined by local governments and no land use or planning requirements will be altered by the proposed project. Further, the proposed project would be consistent with the typical industrial setting of the affected facilities. The swapping of some diesel-fueled workover rigs with non-diesel workover rigs and the use of vacuum trucks and generator sets are expected to occur within the confines of the existing facilities. Further, the use of construction worker vehicles and delivery trucks will occur on established roadways. The proposed project would not affect in any way habitat conservation or natural community conservation plans, agricultural resources or operations, and would not create divisions in any existing communities. Further, no new development or alterations to existing land designations will occur as a result of the implementation of the proposed project. Therefore, present or planned land uses in the region will not be affected as a result of implementing the proposed project.

Based upon these considerations, significant land use and planning impacts are not expected from implementing PAR 1148.1. Since no significant land use and planning impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>XI. MINERAL RESOURCES.</b> Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Project-related impacts on mineral resources will be considered significant if any of the following conditions are met:

- The project would result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
- The proposed project results in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

**Discussion**

**XI. a) & b) No Impact.** There are no provisions in PAR 1148.1 that would result in the loss of availability of a known mineral resource of value to the region and the residents of the state such as aggregate, coal, clay, shale, et cetera, or of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

Based upon these considerations, significant mineral resource impacts are not expected from implementing PAR 1148.1 and, thus, will not be further analyzed. Since no significant mineral resource impacts were identified, no mitigation measures are necessary or required.

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>XII. NOISE.</b> Would the project result in:				
a) Exposure of persons to or generation of permanent noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public use airport or private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Noise impact will be considered significant if:

- Construction noise levels exceed the local noise ordinances or, if the noise threshold is currently exceeded, project noise sources increase ambient noise levels by more than three decibels (dBA) at the site boundary. Construction noise levels will be considered significant if they exceed federal Occupational Safety and Health Administration (OSHA) noise standards for workers.



- The proposed project operational noise levels exceed any of the local noise ordinances at the site boundary or, if the noise threshold is currently exceeded, project noise sources increase ambient noise levels by more than three dBA at the site boundary.

## Discussion

**XII. a), b), c), & d) No Impact.** The proposed project would not require the construction of new facilities at new locations, but any physical effects (e.g., the swapping of some diesel-fueled workover rigs with non-diesel workover rigs or the increased use of vacuum trucks and generator sets) that will result from the proposed project, would occur at existing oil and gas facilities and would not be expected to go beyond existing boundaries. The existing noise environment at each of the affected oil and gas facilities is typically dominated by noise from existing equipment onsite, vehicular traffic around the facilities, and trucks entering and exiting facility premises.

Operation of workover rigs generates some noise, but the noise profile would not be expected to be substantially different for diesel-fueled workover rigs than for non-diesel fueled workover rigs. Similarly, since the operation of vacuum trucks and generator sets at oil and gas facilities is part of current day-to-day activities that generate some noise, the noise profile of these equipment, will not change as a result of implementing the proposed project. Thus, noise from the proposed project is not expected to produce noise in excess of current operations at each of the existing facilities. In addition, any operator of an oil and gas facility that becomes subject to the requirements in an Odor Mitigation Plan and is subsequently required to utilize a non-diesel workover rig in lieu of a diesel-fired workover rig in accordance with PAR 1148.1 or is required to utilize a vacuum truck and generator set to pump out materials collected in a well cellar on an expedited basis would be expected to continue to comply with all existing noise control laws or ordinances. In particular, Occupational Safety and Health Administration (OSHA) and California-OSHA (Cal/OSHA) have established noise standards to protect worker health when noise levels exceed specified noise levels (see for example 29 CFR Part 1910). In addition, noise generating activities are required to be within the allowable noise levels established by the local noise ordinances, and thus are expected to be less than significant.

Even if some of the facilities affected by the proposed project are located at sites within an airport land use plan or within two miles of a public airport, the operation of non-diesel workover rigs in lieu of diesel-fueled workover rigs would not expose people residing or working in the project area to any increased excessive noise levels associated with airplanes.

Based upon these considerations, significant noise impacts are not expected from implementing PAR 1148.1, and thus, this topic will not be further analyzed. Since no significant noise impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>XIII. POPULATION AND HOUSING.</b>				
Would the project:				
a) Induce substantial growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (e.g. through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Impacts of the proposed project on population and housing will be considered significant if the following criteria are exceeded:

- The demand for temporary or permanent housing exceeds the existing supply.
- The proposed project produces additional population, housing or employment inconsistent with adopted plans either in terms of overall amount or location.

**Discussion**

**XIII. a) & b) No Impact.** PAR 1148.1 neither requires construction of new facilities nor requires physical modifications at existing facilities that would entail construction activities. Instead, PAR 1148.1 would enhance monitoring and recordkeeping requirements for facilities subject to the rule. In the event that a facility is required to prepare and obtain approval of an Odor Mitigation Plan, the facility operator would be required to utilize a non-diesel workover rig, in lieu of a diesel-fueled workover rig, if available and feasible. The act of swapping a workover rig (from diesel to non-diesel) would not change the number of employees needed to operate the workover rig. Similarly, in the event that a vacuum truck and generator set is needed to pump out materials collected in a well cellar on an expedited basis, no additional employees would be needed to operate the equipment. However, in order to install monitoring equipment at the affected facilities, three temporary workers per facility may be needed to handle the install process but these workers are expected to be available from the local labor force. Thus, any compliance actions taken by an operator of an affected facility would not be expected to involve the relocation of individuals, require new housing or commercial facilities, or change the distribution of the population. Human population within the jurisdiction of the SCAQMD is anticipated to grow regardless of implementing the proposed project. As a result, the proposed project is not anticipated to generate any significant adverse effects, either direct or indirect, on population growth in the district or population distribution.

Further, the proposed project is not expected to result in the creation of any industry that would affect population growth, directly or indirectly induce the construction of single- or multiple-family units, or require the displacement of people or housing elsewhere in the district.

Based upon these considerations, significant population and housing impacts are not expected from implementing PAR 1148.1, and thus, this topic will not be further analyzed. Since no significant population and housing impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>XIV. PUBLIC SERVICES.</b> Would the proposal result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Impacts on public services will be considered significant if the project results in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response time or other performance objectives.

**Discussion**

**XIV. a) & b) No Impact.** PAR 1148.1 neither requires construction of new facilities nor requires physical modifications at existing facilities that would entail construction. Instead, PAR 1148.1 would enhance monitoring and recordkeeping requirements for facilities subject to the rule. In the event that a facility is required to prepare and obtain approval of an Odor Mitigation Plan, the facility operator would be required to utilize a non-diesel workover rig, in lieu of a diesel-fueled workover rig, if available and feasible. The act of swapping a workover rig (from

diesel to non-diesel), the increased use of vacuum trucks and generator sets, or the temporary use of construction worker vehicles and delivery trucks would not be expected to alter or increase the need or demand for additional public services (e.g., fire and police departments and related emergency services, et cetera) above current levels, so no impact to these existing services is anticipated.

**XIV. c) & d) No Impact.** As noted in the previous “Population and Housing” discussion, the proposed project is not expected to induce population growth in any way because the local labor pool (e.g., workforce) is expected to be sufficient to accommodate any swaps of diesel workover rigs for non-diesel workover rigs, the increased use of vacuum trucks and generator sets and operation of these equipment non-diesel workover rigs is not expected to require additional employees. However, as previously explained in Section XIII – Population and Housing, in order to install monitoring equipment at the affected facilities, three temporary workers per facility may be needed to handle the install process but these workers are expected to be available from the local labor pool. Therefore, there would be no increase in local population and thus, no impacts would be expected to local schools or other public facilities.

The proposed project could result in some facilities becoming subject to an Odor Mitigation Plan in the event of compliance problems. Besides SCAQMD’s review and approval process associated with an Odor Mitigation Plan, there would be no need for other types of government services. Further, the proposed project would not result in the need for new or physically altered government facilities in order to maintain acceptable service ratios, response times, or other performance objectives. There would be no increase in population and, therefore, there would be no need for physically altered government facilities.

Based upon these considerations, significant public services impacts are not expected from implementing PAR 1148.1, and thus, this topic will not be further analyzed. Since no significant public services impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>XV. RECREATION.</b>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment or recreational services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Impacts to recreation will be considered significant if:

- The project results in an increased demand for neighborhood or regional parks or other recreational facilities.
- The project adversely affects existing recreational opportunities.

**Discussion**

**XV. a) & b) No Impact.** As discussed earlier under the topic of “Land Use and Planning,” there are no provisions in the PAR 1148.1 that would affect land use plans, policies, or regulations. Land use and other planning considerations are determined by local governments and no land use or planning requirements will be altered by the proposed requirements in PAR 1148.1. The proposed project would not increase the demand for or use of existing neighborhood and regional parks or other recreational facilities or require the construction of new or expansion of existing recreational facilities that might have an adverse physical effect on the environment because it would not directly or indirectly increase or redistribute population.

Based upon these considerations, significant recreation impacts are not expected from implementing PAR 1148.1, and thus, this topic will not be further analyzed. Since no significant recreation impacts were identified, no mitigation measures are necessary or required.

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>XVI. SOLID AND HAZARDOUS WASTE.</b> Would the project:				
a) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Comply with federal, state, and local statutes and regulations related to solid and hazardous waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

The proposed project impacts on solid and hazardous waste will be considered significant if the following occurs:

- The generation and disposal of hazardous and non-hazardous waste exceeds the capacity of designated landfills.

**Discussion**

**XVI. a) & b) No Impact.** PAR 1148.1 neither requires construction of new facilities nor requires physical modifications at existing facilities that would entail construction. Instead, PAR

1148.1 would enhance monitoring and recordkeeping requirements for facilities subject to the rule. In the event that a facility is required to prepare and obtain approval of an Odor Mitigation Plan, the facility operator would be required to utilize a non-diesel workover rig, in lieu of a diesel-fueled workover rig, if available and feasible. The act of swapping a workover rig (from diesel to non-diesel) would not be expected to alter or increase existing waste or generate new waste, either solid or hazardous. Similarly, because the use of additional vacuum trucks and generator sets would merely expedite the removal of odorous materials from any well cellar identified as a verified odor source, no increases in the amount or type of hazardous waste collected and disposed of would be expected to occur.

Operators of affected facilities subject to PAR 1148.1 would be expected to handle their existing waste in the same manner as the currently do, which depends on the classification of the waste and the type of landfill (e.g., Class II landfill for industrial waste or Class III landfill for municipal waste). A Class II landfill can handle wastes that exhibit a level of contamination not considered hazardous, but that are required by the State of California to be managed for disposal to a permitted Class II landfill. For this reason, Class II landfills are specially designed with liners to reduce the risks of groundwater contamination from industrial wastes, also known as California-regulated waste. Similarly, a Class III landfill can handle non-hazardous or municipal waste. Municipal waste is typically generated through day-to-day activities and does not present the hazardous characteristics of hazardous, industrial, or radioactive wastes. There are 32 active Class III landfills within the SCAQMD's jurisdiction, many of which have liners that can handle both Class II and Class III wastes. According to the Final Program EIR for the 2012 AQMP (SCAQMD, 2012), total Class III landfill waste disposal capacity in the district is approximately 116,796 tons per day.

Thus, implementation of PAR 1148.1 is not expected to require additional waste disposal capacity or interfere or undermine an oil and gas facility's ability to comply with existing federal, state, and local regulations for solid and hazardous waste handling and disposal.

Based upon these considerations, significant solid and hazardous waste impacts are not expected from implementing PAR 1148.1, and thus, this topic will not be further analyzed. Since no significant solid and hazardous waste impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>XVII. TRANSPORTATION AND TRAFFIC.</b>				
Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Significance Criteria

Impacts on transportation and traffic will be considered significant if any of the following criteria apply:

- Peak period levels on major arterials are disrupted to a point where level of service (LOS) is reduced to D, E or F for more than one month.
- An intersection's volume to capacity ratio increase by 0.02 (two percent) or more when the LOS is already D, E or F.
- A major roadway is closed to all through traffic, and no alternate route is available.
- The project conflicts with applicable policies, plans or programs establishing measures of effectiveness, thereby decreasing the performance or safety of any mode of transportation.
- There is an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system.
- The demand for parking facilities is substantially increased.
- Water borne, rail car or air traffic is substantially altered.
- Traffic hazards to motor vehicles, bicyclists or pedestrians are substantially increased.
- The need for more than 350 employees
- An increase in heavy-duty transport truck traffic to and/or from the facility by more than 350 truck round trips per day
- Increase customer traffic by more than 700 visits per day.

## Discussion

**XVII. a) & b) Less Than Significant Impact.** PAR 1148.1 neither requires construction of new facilities nor requires physical modifications at existing facilities that would entail construction. Instead, PAR 1148.1 would enhance monitoring and recordkeeping requirements for facilities subject to the rule. In the event that a facility is required to prepare and obtain approval of an Odor Mitigation Plan, the facility operator would be required to utilize a non-diesel workover rig, in lieu of a diesel-fueled workover rig, if available and feasible. As explained in the following paragraphs, the act of swapping three diesel workover rigs to three non-diesel workover rigs would not be expected to cause a significant increase in traffic relative to the existing traffic load and capacity of the street systems surrounding the affected facilities. Similarly, a peak daily operational increase of three vacuum trucks would not be expected to cause a significant increase in traffic relative to the existing traffic load and capacity of the street systems surrounding the affected facilities. Further, a temporary increase of three construction worker vehicles and one delivery trip as part of installing monitoring systems at five facilities on a peak day or at 24 facilities within one six-month period would also not be expected to cause a significant increase in traffic relative to the existing traffic load and capacity of the street systems surrounding the affected facilities. Also, the proposed project is not expected to exceed, either individually or cumulatively, the current LOS of the areas surrounding the affected facilities as explained in the following paragraphs.



For a worst-case analysis, three non-diesel workover rigs with three drivers were assumed to replace three diesel workover rigs with three drivers. Even if it is assumed that all six workover rigs are being moved on the same day (which represents an average vehicle ridership equal to 1.0) not all of the workers would be driving to/from the same facility. In addition, if three additional vacuum trucks drive to and from three separate facilities on the same day and another three construction worker vehicles with one delivery truck drives to and from five separate facilities on the same (which also represents an average vehicle ridership equal to 1.0) not all of the workers would be driving to/from the same facility. For these reasons, it is unlikely that these vehicle trips would substantially affect the LOS at any intersection because the trips would be dispersed over a large area and the workers would not all arrive at the site at the exact same time. Therefore, the construction work force at each affected facility is not expected to significantly increase as a result of the proposed project.

Further, since new, permanent additional employees would not be needed to operate and maintain the replacement workover rigs, drive the vacuum trucks, construction worker vehicles, or delivery trucks, the work force at each affected facility is not expected to significantly increase as a result of implementing PAR 1148.1. As a result, no significant increases in traffic are expected.

**XVII. c) No Impact.** Workover rigs, vacuum trucks and generator sets are all currently in use by the oil and gas industry. As explained in Section I., the height profile and overall footprint of any non-diesel workover rig is not expected to be discernably different from a diesel-fueled workover rig because the height of the workover rig is dependent on the depth of the oil or gas well to be serviced. Similarly, oil and gas facilities currently use vacuum trucks and generator sets with low heights, so the slight increase in use of these equipment, would not alter the height profiles of these equipment. In addition, as explained in Section VIII c), the height of workover rigs, vacuum trucks and generator sets currently in operation does not interfere with plane flight paths consistent with Federal Aviation Regulation, Part 77. Thus, even if some facilities are located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, actions that would be taken to comply with the proposed project (e.g., the act of swapping a workover rig from diesel to non-diesel unit or using a vacuum truck and generator set) would not be expected to significantly influence or affect air traffic patterns or navigable air space. Thus, the proposed project would not result in a change in air traffic patterns including an increase in air traffic levels or a change in location that results in substantial safety risks. As such, this specific topic will not be further evaluated in the Final Draft-EA.

**XVII. d) & e) No Impact.** The siting of each affected facility is consistent with surrounding land uses and traffic/circulation in the surrounding areas of the affected facilities. Thus, the proposed project is not expected to substantially increase traffic hazards, create incompatible uses at or adjacent to the affected facilities. Further, PAR 1148.1 is not expected to require a modification to circulation, thus, no long-term impacts on the traffic circulation system are expected to occur. The proposed project is not expected to involve the construction of any roadways, so there would be no increase in roadway design feature that could increase traffic hazards. Emergency access at each affected facility is not expected to be impacted by the proposed project because each affected facility is expected to continue to maintain their existing emergency access gates. Thus, these impacts will not be evaluated further in this Final Draft-EA.

**XVII. f) No Impact.** Because the compliance activities that may occur in response to an Odor Mitigation Plan or the identification of a well cellar as a verified odor source will occur at existing industrial facilities, implementation of the proposed project (e.g., requiring the use of non-diesel workover rigs or requiring the expedited pump out of a well cellar) is not expected to conflict with policies supporting alternative transportation since the proposed project does not involve or affect alternative transportation modes (e.g., bicycles or buses).

Based upon these considerations, significant transportation and traffic impacts are not expected from implementing PAR 1148.1. Since no significant transportation and traffic impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.</b>				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

**XVIII. a) No Impact.** As discussed in the “Biological Resources” section, PAR 1148.1 is not expected to adversely affect plant or animal species or the habitat on which they rely because the workover rigs are operated at existing oil and gas facilities on industrial sites which have already been greatly disturbed and that currently do not support such habitats. Furthermore, the oil and gas facilities are located on industrial sites that are already either devoid of significant biological resources or whose biological resources have been previously disturbed. Lastly, special status plants, animals, or natural communities are not expected to be found within oil and gas facilities that would be subject to PAR 1148.1 because the affected sites are generally devoid of plants and natural communities that could support animals for fire safety reasons.

Further, as explained in Section X, the proposed project would not require the acquisition of land to comply with the provisions of PAR 1148.1. Also, while implementation of PAR 1148.1 may require some facilities to comply with an Odor Mitigation Plan and utilize a non-diesel workover rig in lieu of a diesel workover rig, the placement and movement of workover rigs are expected to occur entirely within the boundaries of existing oil and gas facilities. In addition, implementation of PAR 1148.1 may require some facilities to expedite the pump out of any well cellar identified as a verified odor source but this work will also occur entirely within the boundaries of existing oil and gas facilities. Similarly, implementing PAR 1148.1 would not require compliance activities to occur in areas where special status plants, animals, or natural communities and important examples of the major periods of California history or prehistory exist. As a result, implementing PAR 1148.1 is not expected to adversely affect in any way habitats that support riparian habitat, are federally protected wetlands, or are migratory corridors. Therefore, these areas would not be expected to be adversely affected by the proposed project.

**XVIII. b) Less Than Significant Impact.** As the Lead Agency under CEQA, the SCAQMD uses the same significance thresholds for project-specific and cumulative impacts for all environmental topics analyzed. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable; conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant<sup>14</sup>.

Based on the preceding analyses in discussion topics I. through XVII., PAR 1148.1 is not expected to generate any project-specific significant adverse environmental impacts for the following reasons. None of the 17 environmental topics analyzed were checked as areas potentially affected by the proposed project (e.g., aesthetics, agriculture and forestry resources, air quality and GHG emissions, biological resources, cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, solid and hazardous waste, and, transportation and traffic). All 17 environmental topic areas were found to have ‘No Impact’ or ‘Less Than Significant Impact’ and would not be expected to make any contribution to potential cumulative impacts whatsoever. For the environmental topics checked as areas having a ‘Less Than Significant Impact,’ the analysis indicated that the proposed project impacts

<sup>14</sup> SCAQMD Cumulative Impacts Working Group White Paper on Potential Control Strategies to Address Cumulative Impacts From Air Pollution, August 2003, Appendix D, Cumulative Impact Analysis Requirements Pursuant to CEQA, at D-3. <http://www.aqmd.gov/hb/2003/030929a.html>

would be less than significant because they would not exceed any project-specific significance thresholds.

With respect to air quality, no cumulative impacts are anticipated from the proposed project. Emissions resulting with implementation of the proposed project will be below the SCAQMD's thresholds for all criteria air pollutants. Although the proposed project may contribute additional air pollutants to an existing nonattainment area, these increases are below the SCAQMD air quality significance criteria. Therefore, the proposed project will not cause a significant environmental effect, nor result in an unavoidable cumulatively considerable contribution to an air quality impact<sup>15</sup>.

Emissions relative to GHG emissions from the proposed project will also be below the SCAQMD's cumulatively considerable significance threshold for GHGs. Thus, no significant adverse impacts are expected, either individually or cumulatively.

With respect to energy, no cumulative energy impacts are expected because the potential increase in electricity demand and alternative fuels from the proposed project is well within available supplies. Therefore, the amount of electricity, [diesel fuel](#), [gasoline](#), and alternative fuel demand will not cause a significant adverse impact to existing energy generation and supplies. Therefore, no significant increase in energy is expected at the affected sites, and no cumulative energy impacts are expected.

Consistent with CEQA Guidelines §15064.7, a “lead agency may rely on a threshold of significance standard to determine whether a project will cause a significant environmental effect.” Further, CEQA Guidelines §15064 (h)(1) requires that a “lead agency consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable.” Where a lead agency is examining a project with an incremental effect that is not cumulatively considerable, a lead agency need not consider the effect significant, but must briefly describe the basis for concluding that the incremental effect is not cumulatively considerable. As stated above, projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable; projects that do not exceed the project-specific significance thresholds are not considered to be cumulatively considerable. Therefore the proposed project's contribution to air quality and GHGs are not cumulatively considerable, and thus not significant. This conclusion is consistent with CEQA Guidelines §15064 (h)(4), which states, “The mere existence of cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable.”

Based on these conclusions, incremental effects of the proposed project would be minor and, therefore, are not considered to be cumulatively considerable as defined by CEQA Guidelines §15064 (h)(1). Since impacts from the proposed project are not considered to be cumulatively considerable, the proposed project has no potential for generating significant adverse cumulative impacts.

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<sup>15</sup> Refer also to *Citizens for Responsible Equitable Environmental Development c. City of Chula Vista* (2011) 197 Cal. App. 4<sup>th</sup> 327, 334 and *Rialto Citizens for Responsible Growth v. City of Rialto* (2102) 208 Cal. App. 4<sup>th</sup> 899 pertaining to the determination of significant impacts and whether a project is considered to be cumulatively considerable.

**XVIII. c) Less Than Significant Impact.** Based on the preceding analyses, PAR 1148.1 is not expected to cause adverse effects on human beings, either directly or indirectly. For the environmental topics of aesthetics, air quality and GHG emissions, energy, and, transportation and traffic, less than significant impacts from implementing PAR 1148.1 were identified.

The net effect of implementing PAR 1148.1 is to further prevent public nuisance and possible detriment to public health caused by exposure to VOC, TAC and TOC emissions from the operation and maintenance of oil and gas production facilities by enhancing compliance at these facilities. While the potential air quality benefits of enhancing compliance of oil and gas facilities in accordance with PAR 1148.1 cannot be quantified, for every diesel workover rig that is replaced with a non-diesel workover rig, the analysis in Table 2-5 demonstrates that an overall direct air quality and GHG benefit would be expected. In the event that a vacuum truck and generator set is needed to pump out materials collected in a well cellar on an expedited basis, Table 2-6 shows that while there may be slight increases in criteria pollutant and GHG emissions, the potential increases are well below the significance thresholds. Similarly, while there may be a need for some facilities to install monitoring equipment, the emission calculations as summarized in Tables 2-7 and 2-8 show less than significant increases in construction emissions. Further, the prevention of future releases of VOC, TAC and TOC emissions via the enhanced compliance requirements in PAR 1148.1, less VOC, TAC and TOC emission release will not only reduce odors but assist the SCAQMD's progress in attaining and maintaining the ambient air quality standards for ozone.

Based on the discussion in items I through XVIII, the proposed project is not expected to have the potential to cause significant adverse environmental effects to any environmental topic.

**APPENDIX A**

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**PROPOSED AMENDED RULE 1148.1 – OIL AND GAS  
PRODUCTION WELLS**

In order to save space and avoid repetition, please refer to the latest version of Proposed Amended Rule 1148.1 located elsewhere in the Governing Board Package. The version of Proposed Amended Rule 1148.1 that was circulated with the Draft EA and released on April 29, 2015 for a 30-day public review and comment period ending May 28, 2015 was identified as “par1148-1-pw.docx.”

Original hard copies of the Draft EA, which include the draft version of the proposed amended rule listed above, can be obtained through the SCAQMD Public Information Center at the Diamond Bar headquarters or by calling (909) 396-2039.

## **APPENDIX B**

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### **ASSUMPTIONS AND CALCULATIONS**



**Appendix B**

**Worksheet B-1: Diesel Fuel Use**

**Emission Factors for Diesel Fuel Consumed (lb/thousand gallons except for CO2eq)**

Diesel Burned (gal/hr)	Operating Schedule per Rig (hr/yr)	NOx (lb/1,000 gallons)	VOC (lb/1,000 gallons)	CO (lb/1,000 gallons)	SOx* (lb/1,000 gallons)	PM10 (lb/1,000 gallons)	CO2eq^ (metric tons/yr/rig)
4.2	3,000	438.4	10.8504	116.45	6.9185	7.8501	59.31

\* Corrected for 0.05% sulfur.

^CARB, 2007 Oil and Gas Industry Survey Results, Final Report (Revised), Table 7-3, October 2013.

No. of Workover Rigs in LA, OR, RV, & SB Counties in 2015	Workover Rig Emissions	NOx (lb/day)	VOC (lb/day)	CO (lb/day)	SOx (lb/day)	PM10 (lb/day)	PM2.5# (lb/day)	CO2eq (metric tons/yr)
68	for 68 rigs	1,029.10	25.47	273.35	16.24	18.43	16.95	4,033.08
	for 1 rig	15.13	0.37	4.02	0.24	0.27	0.25	59.31
	for 3 rigs	45.40	1.12	12.06	0.72	0.81	0.75	177.93
	for 65 rigs (after 3 rigs are replaced with electric or alt fuel (lb/day))	983.70	24.35	261.29	15.52	17.61	16.21	3,855.15

# SCAQMD, Final –Methodology to Calculate Particulate Matter (PM) 2.5and PM 2.5 Significance Thresholds, October 2006.

Table A, PM2.5 Fraction of PM10 for off-road diesel-fueled equipment.

**Appendix B**

**Worksheet B-2: Diesel Delivery Trips**

Baseline Diesel Fuel Deliveries to Los Angeles, Orange, Riverside and San Bernardino Counties for fueling 68 rigs 387,748 gallons per year 8,500 gallons hauled per truck 46 trucks/year

On-Road Equipment Type	Fuel	Number Needed per year	Number Needed per day	Round- trip Distance (miles/ delivery)	Mileage Rate (miles/ gallon)	2015 Mobile Source Emission Factors							
						VOC (lb/mile)	CO (lb/mile)	NOx (lb/mile)	SOx (lb/mile)	PM10 (lb/mile)	PM2.5 (lb/mile)	CO2 (lb/mile)	CH4 (lb/mile)
Offsite (Heavy-Heavy Duty Fuel Delivery Truck)	diesel	46	4	50	4.89	0.0018	0.0077	0.0212	0.00004	0.0010	0.0009	4.2090	0.0001

Baseline Combustion Emissions from Diesel Fuel Delivery Trucks	VOC (lb/day)	CO (lb/day)	NOx (lb/day)	SOx (lb/day)	PM10 (lb/day)	PM2.5 (lb/day)	CO2 (lb/yr)	CH4 (lb/yr)	CO2eq* (lb/yr)	CO2eq* (MT/yr)
Offsite (Heavy-Heavy Duty Fuel Delivery Truck)	0.36	1.53	4.25	0.01	0.21	0.18	9,600	0.19	9,604	4.36
<b>TOTAL</b>	<b>0</b>	<b>2</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>9,600</b>	<b>0</b>	<b>9,604</b>	<b>4</b>

Equation: No. of Vehicles x Emission Factor (lb/mile) x No. of Round-Trips/Day x Round-Trip length (mile) = Offsite Construction Emissions (lb/day)

\*1 metric ton (MT) = 2,205 pounds

Diesel Fuel to operate Fuel Delivery Trucks (Baseline)	Equipment Type	Total Miles Driven (miles/year)	Mileage Rate (miles/gal)	Total Diesel Fuel Usage (gal/year)
Offsite (Heavy-Heavy Duty Fuel Delivery Truck)	Fuel Delivery Truck (HHD)	2,281	4.89	11,153
<b>TOTAL Diesel Fuel needed to operate 46 Diesel Tanker Trucks</b>				<b>11,153</b>

**Appendix B**

**Worksheet B-2: Diesel Delivery Trips**

Reduction in Diesel Fuel Deliveries 349,948 gallons per year 8,500 gallons hauled per truck 41 trucks/year  
 to Los Angeles, Orange, Riverside and San Bernardino Counties  
 for fueling 65 rigs  
 (Reduction of 37,800 gallons per year - 5 trucks per year less)

Construction On-Road Equipment Type	Fuel	Number Needed per year	Number Needed per day	Round- trip Distance (miles/ delivery)	Mileage Rate (miles/ gallon)	2015 Mobile Source Emission Factors							
						VOC (lb/mile)	CO (lb/mile)	NOx (lb/mile)	SOx (lb/mile)	PM10 (lb/mile)	PM2.5 (lb/mile)	CO2 (lb/mile)	CH4 (lb/mile)
Offsite (Heavy-Heavy Duty Fuel Delivery Truck)	diesel	41	4	50	4.89	0.0018	0.0077	0.0212	0.00004	0.0010	0.0009	4.2090	0.0001

PAR 1148.1 Combustion Emissions from Diesel Fuel Delivery Trucks	VOC (lb/day)	CO (lb/day)	NOx (lb/day)	SOx (lb/day)	PM10 (lb/day)	PM2.5 (lb/day)	CO2 (lb/yr)	CH4 (lb/yr)	CO2eq* (lb/yr)	CO2eq* (MT/yr)
Offsite (Heavy-Heavy Duty Fuel Delivery Truck)	0.36	1.53	4.25	0.01	0.21	0.18	8,664	0.17	8,668	3.93
<b>TOTAL</b>	<b>0</b>	<b>2</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>8,664</b>	<b>0</b>	<b>8,668</b>	<b>4</b>

Equation: No. of Vehicles x Emission Factor (lb/mile) x No. of Round-Trips/Day x Round-Trip length (mile) = Offsite Construction Emissions (lb/day)  
 \*1 metric ton (MT) = 2,205 pounds

Diesel Fuel to operate Fuel Delivery Trucks (after PAR 1148.1)	Equipment Type	Total Miles Driven (miles/year)	Mileage Rate (miles/gal)	Total Diesel Fuel Usage (gal/year)
Workers' Vehicles - Offsite Delivery/Haul	Fuel Delivery Truck (HHD)	2,059	4.89	10,066
<b>TOTAL Diesel Fuel needed to operate 41 Diesel Tanker Trucks</b>				<b>10,066</b>

Sources:

On-Road Mobile Emission Factors (EMFAC 2007 v2.3), Scenario Year 2015

[http://www.aqmd.gov/ceqa/handbook/onroad/onroad.html/onroadEF07\\_26.xls](http://www.aqmd.gov/ceqa/handbook/onroad/onroad.html/onroadEF07_26.xls)

[http://www.aqmd.gov/ceqa/handbook/onroad/onroad.html/onroadEFHHD07\\_26.xls](http://www.aqmd.gov/ceqa/handbook/onroad/onroad.html/onroadEFHHD07_26.xls)

Net Difference Between Baseline and PAR 1148.1 Combustion Emissions from Diesel Fuel Delivery Trucks - Peak Day	VOC (lb/day)	CO (lb/day)	NOx (lb/day)	SOx (lb/day)	PM10 (lb/day)	PM2.5 (lb/day)
Baseline - 4 trucks/day peak	0.36	1.53	4.25	0.01	0.21	0.18
PAR 1148.1 - 4 trucks per day peak	0.36	1.53	4.25	0.01	0.21	0.18
<b>NET DIFFERENCE</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

**Appendix B**

**Worksheet B-2: Diesel Delivery Trips**

<b>Net Difference Between Baseline and PAR 1148.1 Combustion Emissions from Diesel Fuel Delivery Trucks - Annual</b>	<b>VOC (lb/yr)</b>	<b>CO (lb/yr)</b>	<b>NOx (lb/yr)</b>	<b>SOx (lb/yr)</b>	<b>PM10 (lb/yr)</b>	<b>PM2.5 (lb/yr)</b>	<b>CO2 (lb/yr)</b>	<b>CH4 (lb/yr)</b>	<b>CO2eq* (lb/yr)</b>	<b>CO2eq* (MT/yr)</b>
Baseline - 46 trucks per year	4.07	17.49	48.42	0.09	2.39	2.01	9,600.24	0.19	9,604.24	4.36
PAR 1148.1 - 41 trucks per year	3.68	15.79	43.70	0.08	2.16	1.81	8,664.35	0.17	8,667.96	3.93
<b>NET DIFFERENCE</b>	<b>0.40</b>	<b>1.71</b>	<b>4.72</b>	<b>0.01</b>	<b>0.23</b>	<b>0.20</b>	<b>935.89</b>	<b>0.02</b>	<b>936.28</b>	<b>0.42</b>

<b>Net Difference Between Baseline and PAR 1148.1 Diesel Fuel Needed to Operate Delivery Trucks - Annual</b>	<b>Total Miles Driven (miles/year)</b>	<b>Total Diesel Fuel Usage (gal/year)</b>
<b>TOTAL Diesel Fuel needed to operate 46 Diesel Tanker Trucks</b>	2,281	11,153
<b>TOTAL Diesel Fuel needed to operate 41 Diesel Tanker Trucks</b>	2,059	10,066
<b>NET DIFFERENCE</b>	222	1,087

Electricity demand if 3 diesel workover rigs are replaced with 3 electric workover rigs

Number of Electric Workover Rigs	Max Rating (hp)	Max Rating (kw)	Load Factor	Peak Daily Operating Schedule (hr/day)	Peak Annual Operating Schedule (hr/yr)	Diesel Use (gal/yr)^	Electricity Use (kWh/yr)	CO2eq (MT/yr)	Peak Electricity Use (kWh/day)	Electricity Use (MWh/day)	Instantaneous Electricity Peak Day (MW)
1	1,000	746	0.75	24	3,000	12,600	340.2	0.17	3	0.0027	0.0001
3	1,000	746	0.75	24	3,000	37,800	1020.6	0.51	8	0.0082	0.0003

Note: Instantaneous Electricity Equation: 40 MWh/day x 1 work day/24 hr = 1.68 MW

^CARB, 2007 Oil and Gas Industry Survey Results, Final Report (Revised), Table 7-3, October 2013.

1 gallon diesel - 0.027 kwh electricity

California Energy Commission, Energy Almanac, Gasoline Gallon Equivalents (GGE) for Alternative Fuels, accessed April 24, 2015

<http://www.energyalmanac.ca.gov/transportation/gge.html>

GHG Emission Factors:

1 metric ton (MT) = 2,205 pounds

1,110 lb CO2eq/MWh for electricity when source of power is not identified

(CEC, September 6, 2007 - Reporting and Verification of Greenhouse Gas Emissions in the Electricity Sector)

Alternate Fuel Demand: If 3 diesel workover rigs are replaced with 3 alternate fuel workover rigs

Number of Workover Rigs	Max Rating (hp)	Max Rating (kw)	Load Factor	Peak Daily Operating Schedule (hr/day)	Peak Annual Operating Schedule (hr/yr)	Diesel Use (gal/yr)^	LNG Use (gal/yr)	CNG Use (therm/yr)	CNG Use (gal/yr)	LPG Use (gal/yr)
1	1,000	746	0.75	24	3,000	12,600	7,031	9,185	68,716	8,228
3	1,000	746	0.75	24	3,000	37,800	21,092	27,556	206,148	24,683

1 therm = 7.481 gallons = 1 cf

1 gallon diesel = 0.558 gallons LNG = 0.729 therms CNG = 0.653 gallons LPG

California Energy Commission, Energy Almanac, Gasoline Gallon Equivalents (GGE) for Alternative Fuels, accessed April 24, 2015

<http://www.energyalmanac.ca.gov/transportation/gge.html>

Emission Factors for Alternative Fuel Consumed (g/gal except for CO<sub>2</sub>, N<sub>2</sub>O, CH<sub>4</sub> & CO<sub>2</sub>eq)\*

Type of Alternative Fuel Burned	Amount of Alternative Fuel Burned per day per rig (gallons)	NO <sub>x</sub> (g/gal)	VOC (g/gal)	PM <sub>10</sub> (g/gal)	CO <sub>2</sub> (lb/MMscf)	CH <sub>4</sub> (lb/MMscf)	N <sub>2</sub> O (lb/MMscf)	CO <sub>2</sub> eq (lb/MMscf)
LNG	56.25	3.7	1.17	0.185	120,000	2.3	0.64	120246.7
CNG	549.73	3.7	1.17	0.185	120,000	2.3	0.64	120246.7
LPG	65.82	3.7	1.17	0.185	120,000	2.3	0.64	120246.7

\*Carl Moyer Guidance, Emission Factors for Alternative Fuel Heavy-Duty Engines, Appendix D, Table D-2, July 2014.

<http://www.arb.ca.gov/msprog/moyer/guidelines/current.htm>

GHG Emission Factors:

120,000 lb CO<sub>2</sub>/MMscf fuel burned

0.64 lb N<sub>2</sub>O/MMscf fuel burned

2.3 lb CH<sub>4</sub>/MMscf fuel burned

CO<sub>2</sub>eq = CO<sub>2</sub> + 21\*CH<sub>4</sub> + 310\*N<sub>2</sub>O

<b>LNG Workover Rig Emissions</b>	<b>NOx (lb/day)</b>	<b>VOC (lb/day)</b>	<b>PM10 (lb/day)</b>	<b>PM2.5# (lb/day)</b>	<b>CO2eq (MT/yr)</b>
for 1 rig	0.46	0.15	0.02	0.02	0.05
for 3 rigs	1.38	0.44	0.07	0.06	0.15

1 g= 453.6 lb

1 metric ton (MT) = 2,205 pounds

<b>CNG Workover Rig Emissions</b>	<b>NOx (lb/day)</b>	<b>VOC (lb/day)</b>	<b>PM10 (lb/day)</b>	<b>PM2.5# (lb/day)</b>	<b>CO2eq (MT/yr)</b>
for 1 rig	4.48	1.42	0.22	0.21	0.50
for 3 rigs	13.45	4.25	0.67	0.62	1.50

<b>LPG Workover Rig Emissions</b>	<b>NOx (lb/day)</b>	<b>VOC (lb/day)</b>	<b>PM10 (lb/day)</b>	<b>PM2.5# (lb/day)</b>	<b>CO2eq (MT/yr)</b>
for 1 rig	0.54	0.17	0.03	0.02	0.06
for 3 rigs	1.61	0.51	0.08	0.07	0.18

# SCAQMD, Final –Methodology to Calculate Particulate Matter (PM) 2.5and PM 2.5 Significance Thresholds, October 2006.

Table A, PM2.5 Fraction of PM10 for off-road diesel-fueled equipment.

**Appendix B**

**Worksheet B-5: Vacuum Trucks and Temporary Lighting**

**Additional vacuum trucks needed**                      **3 trucks/year**                      **Peak Day: 3 trucks/day**  
**to conduct same day well cellar pump out**  
**if verified odor source**

On-Road Equipment Type	Fuel	Number Needed per year	Number Needed per peak day	Round-trip Distance (miles/delivery)	Mileage Rate (miles/gallon)	2015 Mobile Source Emission Factors							
						VOC (lb/mile)	CO (lb/mile)	NOx (lb/mile)	SOx (lb/mile)	PM10 (lb/mile)	PM2.5 (lb/mile)	CO2 (lb/mile)	CH4 (lb/mile)
Offsite (Heavy-Heavy Duty Vacuum Truck)	diesel	3	3	50	4.89	0.0018	0.0077	0.0212	0.00004	0.0010	0.0009	4.2090	0.0001

Peak Combustion Emissions from Additional Vacuum Trucks	VOC (lb/day)	CO (lb/day)	NOx (lb/day)	SOx (lb/day)	PM10 (lb/day)	PM2.5 (lb/day)	CO2 (lb/vr)	CH4 (lb/vr)	CO2eq* (lb/vr)	CO2eq* (MT/vr)
Offsite (Heavy-Heavy Duty Vacuum Truck)	0.27	1.15	3.18	0.01	0.16	0.13	631	0.01	632	0.29
<b>TOTAL</b>	<b>0</b>	<b>1</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>631</b>	<b>0</b>	<b>632</b>	<b>0</b>

Equation: No. of Vehicles x Emission Factor (lb/mile) x No. of Round-Trips/Day x Round-Trip length (mile) = Offsite Construction Emissions (lb/day)

\*1 metric ton (MT) = 2,205 pounds

	Equipment Type	Total Miles Driven (miles/day)	Total Miles Driven (miles/year)	Mileage Rate (miles/gal)	Total Diesel Fuel Usage (gal/day)	Total Diesel Fuel Usage (gal/year)
Offsite (Heavy-Heavy Duty Fuel Delivery Truck)	Vacuum Truck (HHD)	150	150	4.89	30.67	30.67
<b>TOTAL Diesel Fuel needed to operate 3 additional vacuum trucks</b>					<b>31</b>	<b>31</b>

**Additional temporary lighting for potential nighttime operations of vacuum trucks**

Off-Road Equipment Type	Fuel	Number Needed per year	Number Needed per peak day	Operating Schedule (hours/day)	2015 Mobile Source Emission Factors							
					VOC (lb/hr)	CO (lb/hr)	NOx (lb/hr)	SOx (lb/hr)	PM10 (lb/hr)	PM2.5 (lb/hr)	CO2 (lb/hr)	CH4 (lb/hr)
Generator Set to support portable lighting equipment (composite)	diesel	3	3	2	0.0018	0.0077	0.0212	0.00004	0.0010	0.0009	4.2090	0.0001

Peak Combustion Emissions from Operating generator sets	VOC (lb/day)	CO (lb/day)	NOx (lb/day)	SOx (lb/day)	PM10 (lb/day)	PM2.5 (lb/day)	CO2 (lb/vr)	CH4 (lb/vr)	CO2eq* (lb/vr)	CO2eq* (MT/vr)
Generator Set to support portable lighting equipment (composite)	0.0107	0.0460	0.1274	0.0002	0.0063	0.0053	25.2541	0.0005	25.2647	0.0115
<b>TOTAL</b>	<b>0.01</b>	<b>0.05</b>	<b>0.13</b>	<b>0.00</b>	<b>0.01</b>	<b>0.01</b>	<b>25.25</b>	<b>0.00</b>	<b>25.26</b>	<b>0.01</b>

Equation: No. of Vehicles x Emission Factor (lb/mile) x No. of Round-Trips/Day x Round-Trip length (mile) = Offsite Construction Emissions (lb/day)

\*1 metric ton (MT) = 2,205 pounds

Incremental Increase in Diesel Fuel Usage From Operating Generator Sets to support portable lighting equipment	Total Operating Hours/day (peak)	Total Operating Hours/year	Diesel Fuel Usage (gal/hr)	Total Diesel Fuel Usage - Peak Day (gal/day)	Total Diesel Fuel Usage (gal/vr)
Operation of Generator Sets	6	6	2.68	16.08	16.08
<b>TOTAL Diesel Fuel needed to operate 3 additional generator sets</b>				<b>16</b>	<b>16</b>



**Appendix B**

**Worksheet B-6: Installation of Monitoring Equipment**

**Monitoring System Installation in last six months of Year 2015**

Activity	No. of Facilities affected	No. of Facilities under construction on a peak day	Days of construction per system installation	Total Days of Construction per facility	Crew Size per installation
Construction	24	5	1.0	1.00	3
<b>Total</b>			<b>1.00</b>		

Construction On-Road Equipment Type	Fuel	Number Needed	Round-trip Distance (miles/day)	Mileage Rate (miles/gallon)	2015 Mobile Source Emission Factors							
					VOC (lb/mile)	CO (lb/mile)	NOx (lb/mile)	SOx (lb/mile)	PM10 (lb/mile)	PM2.5 (lb/mile)	CO2 (lb/mile)	CH4 (lb/mile)
Offsite (Construction Worker Vehicle)	gasoline	3	30	20	0.0007	0.0061	0.0006	0.00001	0.0001	0.0001	1.1019	0.0001
Offsite (Delivery Truck - Medium Duty)	diesel	1	50	6	0.0017	0.0117	0.0129	0.00003	0.0005	0.0004	2.8125	0.0001

Incremental Increase in Combustion Emissions from On-Road Construction Vehicles	VOC (lb/day)	CO (lb/day)	NOx (lb/day)	SOx (lb/day)	PM10 (lb/day)	PM2.5 (lb/day)	CO2 (lb/day)	CH4 (lb/day)	CO2eq* (lb/day)	CO2eq* (MT/project)
Offsite (Construction Worker Vehicle)	0.06	0.55	0.05	0.0010	0.0083	0.0054	99.17	0.01	99.29	0.0015
Offsite (Delivery Truck)	0.09	0.58	0.64	0.0014	0.0252	0.0206	140.62	0.00	140.71	0.0021
<b>SUBTOTAL</b>	<b>0.15</b>	<b>1.14</b>	<b>0.70</b>	<b>0.0023</b>	<b>0.0335</b>	<b>0.0260</b>	<b>239.80</b>	<b>0.01</b>	<b>239.99</b>	<b>0.0036</b>

Equation: No. of Vehicles x Emission Factor (lb/mile) x No. of Round-Trips/Day x Round-Trip length (mile) = Offsite Construction Emissions (lb/day)

\*SCAQMD Regulation XXVII - Climate Change, Rule 2700 - General, Table 1 - Global Warming Potentials, CO2 = 1 and CH4 = 21

\*1 metric ton (MT) = 2,205 pounds; GHGs from temporary construction activities are amortized over 30 years

Construction Emissions Summary	VOC (lb/day)	CO (lb/day)	NOx (lb/day)	SOx (lb/day)	PM10 (lb/day)	PM2.5 (lb/day)	CO2 (lb/day)	CH4 (lb/day)	CO2eq (lb/day)	CO2eq (MT/project*)
Combustion Emissions from On-Road Construction Vehicles	0.15	1.14	0.70	0.00	0.0335	0.0260	239.80	0.01	239.99	0.0036
<b>TOTAL for 1 Facility</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>240</b>	<b>0</b>	<b>240</b>	<b>0</b>
Significance Threshold	75	550	100	150	150	55	n/a	n/a	n/a	n/a
<b>Exceed Significance?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>n/a</b>	<b>n/a</b>	<b>n/a</b>	<b>n/a</b>

\*1 metric ton (MT) = 2,205 pounds; GHGs from temporary construction activities are amortized over 30 years

	VOC (lb/day)	CO (lb/day)	NOx (lb/day)	SOx (lb/day)	PM10 (lb/day)	PM2.5 (lb/day)	CO2 (lb/day)	CH4 (lb/day)	CO2eq (lb/day)	CO2eq (MT/project*)	CO2eq (MT/for 24 facilities*)
<b>TOTAL for 5 Facilities Overlapping Construction in 2015 on a peak day</b>	<b>0.73</b>	<b>5.69</b>	<b>3.48</b>	<b>0.01</b>	<b>0.17</b>	<b>0.13</b>	<b>1198.99</b>	<b>0.05</b>	<b>1199.97</b>	<b>0.02</b>	<b>0.09</b>
Significance Threshold	75	550	100	150	150	55	n/a	n/a	n/a	n/a	10,000
<b>Exceed Significance?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>n/a</b>	<b>n/a</b>	<b>n/a</b>	<b>n/a</b>	<b>NO</b>

\*1 metric ton (MT) = 2,205 pounds; GHGs from temporary construction activities are amortized over 30 years

**Appendix B**

**Worksheet B-6: Installation of Monitoring Equipment**

<b>Incremental Increase in Fuel Usage From Construction Equipment and Workers' Vehicles</b>	<b>Total Construction Hours for Project</b>	<b>Equipment Type</b>	<b>Total Diesel Fuel Usage (gal/day)</b>	<b>Total Gasoline Fuel Usage (gal/day)</b>
Workers' Vehicles - Commuting	N/A	Light-Duty Vehicles	N/A	4.50
Workers' Vehicles - Offsite Delivery/Haul	N/A	Delivery Truck	8.33	N/A
<b>TOTAL for 1 Facility</b>			<b>8</b>	<b>5</b>
<b>TOTAL for 5 Facilities Overlapping Construction in 2015</b>			<b>42</b>	<b>23</b>

	<b>Total Diesel Fuel Usage (gal/project)</b>	<b>Total Gasoline Fuel Usage (gal/project)</b>
<b>TOTAL for all 24 Facilities</b>	<b>200</b>	<b>108</b>

Source:

On-Road Mobile Emission Factors (EMFAC 2011), Scenario Year 2015

[http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/emfac-2007-\(v2-3\)-emission-factors-\(on-road\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/emfac-2007-(v2-3)-emission-factors-(on-road))

**APPENDIX C**

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**COMMENT LETTERS RECEIVED ON THE DRAFT EA AND  
RESPONSES TO COMMENTS**

## **INTRODUCTION**

The Draft EA was released for a 30-day public review and comment period from April 29, 2015 to May 28, 2015 which identified the topics of air quality and greenhouse gases, and energy as environmental topic areas that may be adversely affected by the proposed project, but after completing the analysis, were shown to have less than significant impacts. The SCAQMD received two comment letters from the public regarding the analysis in the Draft EA during the public comment period.

The comment letters have been numbered (see Table C-1 below) and individual comments within each letter have been bracketed and numbered. Following each comment letter is SCAQMD's responses to the individual comments.

**Table C-1**  
**List of Comment Letters Received Relative to the Draft EA**

<b>Comment Letter</b>	<b>Commentator</b>
#1	Western States Petroleum Association
#2	Joyce Dillard



Western States Petroleum Association  
Credible Solutions • Responsive Service • Since 1907

Sandra Burkhart  
Senior Coastal Coordinator

Comment Letter 1

May 28, 2015

Ms. Barbara Radlein  
c/o Office of Planning, Rule Development and Area Sources  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765-4178

Subject: Notice of Completion of a Draft Environmental Assessment –  
Proposed Amended Rule 1148.1 – Oil and Gas Production Wells

Dear Ms. Radlein:

Western States Petroleum Association (WSPA) appreciates the opportunity to comment on the abovementioned Draft EA. WSPA is a non-profit trade association representing companies that explore for, produce, refine, transport and market petroleum, petroleum products, natural gas and other energy supplies in California and four other western states. 1-1

Overall, WSPA is concerned that the amended regulation does nothing to improve air quality in the South Coast Air Basin. Further, the regulation adds voluminous requirements, paperwork, notification and compliance testing while there has been no determination of an odor nuisance from this source category and there are already odor nuisance regulations in place should the need arise. The regulation is duplicative and does not further the agency’s mission of attaining Ambient Air Quality Standards in any way. 1-2

**Draft EA Specific Comments**

The comments below highlight specific concerns about the amendment and the associated Draft EA. 1-3

The document states that “By statute, the SCAQMD is required to adopt an air quality management plan (AQMP) demonstrating compliance will all federal and state ambient air quality standards for the district. Furthermore, the SCAQMD must adopt rules and regulations that carry out the AQMP.” WSPA agrees with this assertion but is unclear how this amendment carries out the AQMP or the agency’s mission in any way. *There are no emission reductions associated with the amendment.* 1-4

The introduction presents background information about the health effects of VOCs including “coughing, sneezing, headaches...” *Again, it is unclear what the relevance of this information is as there are no emission reductions associated with this amendment.* 1-5

The Draft EA states that the regulation is being revisited “*due to an increased awareness of oil and gas production wells by the community...*” Please clarify what this means and how it has any relevance to the necessity of a regulation amendment. There is no evidence to suggest that this industry has had a problem in the past or created a significant odor nuisance. 1-6

“*To prevent public odor nuisance and possible detriment to public health caused by exposure to VOC, TAC, and total organic compound emissions (TOC) from the operation and maintenance of oil and gas production facilities...*” (page 1-1) Again, there appears to be no emission inventory presented to suggest that there are any emission reductions associated this amendment so this statement is misleading and erroneous. 1-7

The California Environmental Quality Act (CEQA) defines a “Project” as the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment. WSPA requests clarification as to what the physical change on the environment is as a result of the project. SCAQMD staff indicated at the Stationary Source Committee that the proposed amendments result in emission reductions; however, there is no inventory provided to allow for an adequate analysis. 1-8

The document states that “To date, there are 473 oil and gas production facilities operating within SCAQMD’s jurisdiction that are either currently subject to Rule 1148.1 or registered via Rule 222.” Of these facilities, District staff indicated that more than 1,000 wells were drilled throughout the last twelve months. It is further WSPA’s understanding that there were no violations issued to this industry throughout the last twelve months. Therefore, the necessity of this amendment is unclear. 1-9

Please clarify that in addition to the list of regulations subject to this industry, oil and gas production facilities are also subject to Rule 402 – Nuisance. This regulation is already being complied with by this industry making the rule amendment duplicative and unnecessary. 1-10

“*This subdivision proposes clarifications that include the reduction of TAC and TOC emissions as contaminants, in addition to VOCs, that will contribute to the overall emission reduction goal.*” (page 1-14).

Page 2-4 states, “*PAR 1148.1 is undergoing amendments in order to further prevent public nuisance and possible detriment to public health caused by exposure to VOC, TAC and TOC emissions from the operation and maintenance of oil and gas production facilities.*” 1-11

Again, if there are emission reductions associated with the proposed amendments, they should be quantified and included herein. If there are no emission reductions associated with the amendment, statements such as the abovementioned need to be corrected as they are misleading in nature.

WSPA is unclear about the installation of a rubber grommet as part of a maintenance or drill piping replacement activity and its relevance to a potential odor nuisance. 1-12

Please clarify what instrumentation is being used to determine the occurrence of each confirmed odor event. 1-13

Table 1-1 – Proposed Odor Monitoring and Mitigation Requirements, lists the requirement of an alternative fuel or electric powered workover rig. This table’s title is misleading as there are allegedly no mitigation measures associated with this Draft EA nor are there any significant adverse environmental impacts. 1-14

Appendix B in the Draft EA highlights emission reductions that appear to be exclusive to the requirement related to the electric workover rig. It is WSPA’s understanding that this requirement has been removed from 1-15

the proposed amended regulation. If this is the case, potential emission reductions associated with this proposed amendment were the premise for the entire analysis. WSPA respectfully requests that a new emission inventory be developed and that this document be recirculated so that the public has sufficient time to review this significant new information presented therein. 1-15 cont.

Table 1-1 also lists leak detection and repair (LDAR) requirements. The document accurately states that LDAR requirements are contained in Rule 1173. However, this rule is not the subject of this analysis nor is it being amended at this time. It is unclear why it is being referenced and why a change to Rule 1173 would be reflected in Rule 1148.1. 1-16

### Air Quality

There are two methods of piping controls listed as Mitigation Plan Improvement Measures in the Staff Report as well as the Draft EA. It is unclear how enclosures or tarping has anything to do with reducing odor. Further, if enclosure is a compliance option, why is the analysis of enclosure completely missing from the Draft EA? The Draft EA states that *“Because of the available compliance options for storing removed drill piping and drill rods, the analysis in this Draft EA assumes that facility operators would not choose to construct new storage areas or modify existing storage areas when a tarp can be used instead. Thus, the proposed project would not promote the construction of new facilities or structures nor would it cause construction activities to occur at existing facilities.”* (page 2-4) 1-17

The rule specifically lists an enclosed structure as a potential compliance option but no environmental analysis is provided. CEQA requires that all indirect environmental impacts be evaluated that result from the proposed project. WSPA is further unclear what measures were taken to determine *“that facility operators would not choose to construct new storage areas...”* Which facilities were surveyed or questioned relative to their compliance determination under this clause? The analysis should have conservatively assumed that even a portion of the facilities would choose this option and the indirect impacts should have been evaluated. This analysis would have demonstrated that the proposed amendments have potential adverse environmental impacts associated with the construction of storage units to house piping. 1-18

The Staff Report indicates that covering drill rods and piping with plastic tarping will be the preferred option; again it unclear how this determination was made. However, the staff report further indicates that *“each potentially affected facility would use up to six tarps, twice a year for six wells.”* (Staff Report page 21) Using this estimate provided, it appears that 473 facilities would each need six tarps twice a year. This would result in the delivery and installation of 5,676 tarps per year throughout the Basin. Since drilling schedules and facilities vary greatly, it would have to be assumed that these tarps may be delivered individually as needed. Therefore, it is again unclear why there is no analysis of the secondary air quality impacts associated with these tarp deliveries. This analysis would indicate that there are adverse environmental impacts associated with the project and no air quality benefits. 1-19

WSPA takes exception to several unsubstantiated statements in this section. First, that the rule amendment seeks to *“minimize the potential for odor and nuisance and odor impacts to local residents and sensitive receptors that are often located nearby from ongoing operations that do not include drilling.”* Again, there is no history of nuisance impacts from this sector nor has any substantiation been provided in the Staff Report. WSPA is also requesting substantiation as to how SCAQMD knows that these facilities are often located nearby sensitive receptors. These statements are misleading particularly when there is no evidence that any sensitive receptors have even found this source category to be a nuisance. 1-20

Another sentence that requires revision or clarification states that “...*the proposed project will continue to assist the SCAQMD’s progress in attaining and maintaining the ambient air quality standards for ozone.*” This statement is completely false and needs to be removed from the Draft EA. 1-21

Another statement that is concerning to WSPA says, “*PAR 1148.1 neither requires the construction of new facilities nor requires physical modifications at existing facilities that would entail construction activities.*” The proposed amended regulation specifically requires an enclosure for used rods. CEQA requires an analysis of this mandatory component and we request that emissions from the construction of these structures being included in the Final EA. 1-22

The utilization of an electric workover rig assumed in the analysis has been removed from the regulation. The Final EA needs to reflect that Appendix B and Tables 2-2, 2-3 2-4 and 2-5 are no longer valid and there are no emission reductions associated with this amendment. As such, there are now no environmental benefits associated with the amendment yet there are several potential adverse environmental impacts that have yet to be adequately addressed. 1-23

The air quality analysis indicates that “*past compliance data for Rule 1148.1 facilities has shown that only three facilities experienced more than three confirmed odor events....*” There are no dates indicated to determine when these confirmed odor incidents occurred but WSPA knows of no odor incidents within the last year at its more than 473 facilities. This begs the question as to the necessity of this amendment. One of the mandatory findings under California Health and Safety Code Section 40727 is a finding of Necessity. WSPA is unclear how this finding can possibly be made when there is no evidence to suggest there is a nuisance problem that needs to be addressed. 1-24

Although it is WSPA’s understanding that the electric workover rig component of the amendment has been removed, the statement that “*facility operators could choose to install electricity generating equipment in order to support the operation of an electric workover rig*” is concerning. The SCAQMD finds it more environmentally beneficial to generate more power in order to reduce potential odor impacts that have not occurred nor have they occurred in the past. If a new power generating source is required as a result of this regulation, it should have been evaluated under this CEQA analysis. It is part of this rule amendment and not including it is considered “piece meal” under CEQA and prohibited. 1-25

Any reference to an electric work over rig or clean fuel work over should be removed if this component has been taken out of the amendment. If this component remains in the amendment, this analysis is flawed and must evaluate all secondary impacts associated with this change including the installation or creation of new power generating facilities. 1-26

The Air Quality Section includes a statement that “*PAR 1148.1 would not change any of the VOC/TOC/TAC reduction aspects in [SIC] currently in the rule....*” WSPA agrees with this statement and requests that a clarification be made throughout the document to indicate that there are no emission reductions associated with the rule. Any references to furthering the goals of the AQMP or attaining ozone standards are misleading, false and should be removed. 1-27

**Energy**

If the electric work over rig component remains in the rule amendment, then the Energy analysis needs revisions and recirculation under CEQA. There is an estimate of approximately 68 workover rigs that may need to be converted to electric. If so, there is a potential for an increase in the demand for utilities that exceed current capacities. WSPA is unclear why the analysis assumes only three workover rigs that may need 1-28



conversion since the rule amendment applies to the entire industry. Table 2-6 should be revised to accurately reflect the number of work over rigs operating in the Basin. 1-28 cont.

### **Geology and Soils**

The proposed amended rule allows for the use of a storage shed. As such WSPA requests clarification as to why this section states that *“Other than the possible replacement of three diesel-fueled workover rigs with three non-diesel workover rigs, no physical modifications to buildings or structures are expected to occur as a result of implementing PAR 1148.1”* The rule specifically allows for the construction of a storage shed as a compliance option so this option is required to be evaluated under CEQA. 1-29

WSPA also requests substantiation as to how SCAQMD knows that all of these sites are flat or have all been previously graded? Any facility choosing to install the storage shed would need to excavate and grade the site as part of compliance. 1-30

### **Hazards and Hazardous Materials/Solid and Hazardous Waste**

WSPA requests further analysis relative to VIII a-b. If SCAQMD requires the use of 5,676 oversized tarps that could come in contact with crude oil or by-products, these tarps would be required to be disposed of as hazardous waste. This is costly and there is a significant shortage of landfills permitted to accept hazardous materials. An analysis should be conducted as to the trips generated and the site location of that these tarps would need to be transported to. This is a potential adverse impact that has not been addressed or quantified in any way. The significance criteria for Solid and Hazardous Waste states that the project can be significant if “the generation and disposal of hazardous and non-hazardous waste exceeds the capacity of designated landfills.” It is unclear how a non-significance determination can be made lacking any quantification or analysis of local capacity to handle hazardous materials. 1-31

If hydrogen sulfide (H2S) vented to the atmosphere is being reduced as a result of the proposed amended regulation as the analysis asserts, this should have been quantified. No quantification of emission reductions (of any pollutant) is provided to allow for an adequate analysis. 1-32

### **Hydrology and Water Quality**

Please see the comments above. The proposed amendments specifically allow for the construction of a storage shed as part of mandatory rule compliance. WSPA disagrees with the statement that *“PAR 1148.1 neither requires construction of new facilities nor requires physical modifications at existing facilities that would entail construction activities that would require water for dust mitigation.”* 1-33

This analysis is inadequate and requires quantification. 1-35

### **Land Use and Planning**

Please see the comments above. This analysis is inadequate and requires quantification. 1-34

### **Transportation and Traffic**

The delivery and removal of approximately 5,767 tarps needs to be addressed. WSPA is unclear what vendor can supply these oversized tarps and how far they would need to travel for delivery and then subsequent 1-35

removal as a hazardous waste. Quantification is needed before this analysis can adequately find no significant impacts from the environmental sector.  
If the tarps are not delivered, it is because a facility has chosen to comply with the construction of a storage shed. There are workers, equipment and deliveries associated with this construction that should have been addressed.

1-35  
cont.

**Mandatory Findings of Significance**

The Draft EA lacks the detail or quantification to make an adequate finding of significance under CEQA. The SCAQMD's own footnote highlighting documentation that is more than 12 years old should indicate that this type of documentation is outdated and not an effective tool for determining cumulative significance.

1-36

WSPA requests that the reference to "possible detriment to public health caused by exposure to VOC, TAC and TOC emissions...." be removed. This is false and misleading and contradicts many other statements that confirm that the amendments are administrative and do not reduce emissions in any way.

1-37

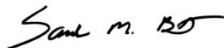
WSPA appreciates the opportunity to comment on the Draft EA for PAR 1148.1. We request that the analysis be re-done and recirculated to remove the reference to the electric workover rig as well as include an adequate analysis related to the thousands of tarps and storage sheds that are required to be included as part of this rule amendment.

1-38

WSPA also requests the removal of any reference to emission reductions associated with this amendment and finally, would encourage the SCAQMD to focus on rule development that actually attains and maintains ambient air quality standards necessary to protect public health. This amendment is an administrative, costly burden with no environmental benefits whatsoever.

1-39

Sincerely,



Sandra Burkhardt  
Senior Coordinator, Coastal Region, State Marine, Waste, and Property Tax Issues

CC: Barry Wallerstein, D.Env.  
Governing Board members

**RESPONSES TO COMMENT LETTER #1**  
**(Western States Petroleum Association – May 28, 2015)**

- 1-1** This comment introduces the nature of the commentator’s affiliation with the oil and gas industry. No response is necessary.
- 1-2** This comment claims that PAR 1148.1 does nothing to improve air quality and instead adds voluminous requirements, paperwork, notification, and compliance testing even though there has been no determination of an odor nuisance and other odor nuisance regulations are already in place. This comment claims that PAR 1148.1 is duplicative and does not further SCAQMD’s mission of attaining ambient air quality standards.

The SCAQMD has a responsibility for not only achieving a reduction in criteria pollutants leading to attainment of the ambient air quality standards, but also for preventing public nuisance under the Health and Safety Code. Odor issues affecting a single complainant may be better described as a private nuisance and would not be covered by this authorization. The criteria used to establish a public nuisance is a relatively high bar, generally requiring six or more independent complainants and verification by SCAQMD personnel. PAR 1148.1 seeks to improve awareness over the issues involved with the complaint handling process, the efforts by the regulated industry, and the concerns from the local community, especially as they pertain to exposures from potentially toxic components of crude oil. Unlike as the commenter asserts, the proposed amended rule is not duplicative, as further described in the following paragraphs.

Appendix B of the Staff Report for PAR 1148.1 includes a five-year complaint history summary for a sample of the 473 oil and gas production facilities, which identifies three odor nuisance notices of violation as well as eight additional notices of violations that were identified during the investigation process for the complaints. The current complaint handling process used by the SCAQMD as part of the implementation of Rule 402 – Nuisance, involves the confirmation by an agency inspector of any odor identified in a complaint. The confirmation includes identification of the odor at the complainant location, traced back to a source. Although not every complaint call is a verifiable event, the complaint itself can be a community outreach opportunity, either as an indicator of dissatisfaction with perceived responses, actions, or of the desire for more information and awareness of the activities, including frequency and timeframes. In this way, management of potential private nuisance issues can help avoid escalation into a possible public nuisance situation.

SCAQMD Rule 410 — Odors from Transfer Stations and Material Recovery Facilities, currently establishes odor management practices and requirements to reduce odors from municipal solid waste transfer stations and material recovery facilities. In addition, Proposed Rule 415 — Odors from Rendering Facilities, seeks to establish odor mitigation requirements applicable to Rendering Facilities, and is scheduled for adoption later this year. PAR 1148.1 represents a

continuation of the effort to further minimize the potential for public nuisance due to odors from specific industries. PAR 1148.1 consists of two parts: 1) basic requirements for all covered facilities which are not burdensome; and, 2) Odor Mitigation Plan requirements which only go into effect once a triggering event occurs, meaning that there is a heightened potential for public nuisance. While there are various regulations that address accidental releases or breakdowns, it is not certain that potential nuisance can be solely attributed to upset conditions, or to other non-upset conditions from routine or preventative maintenance activities, or to otherwise compliant but inefficient operational or maintenance practices.

The provisions of PAR 1148.1 seek to strengthen the preventative measures some facilities may currently be taking and formalizing them in order to improve communication and transparency between the regulated community and their local residential community. As such, SCAQMD staff believes that only facilities with ongoing odor nuisance issues will become subject to the more stringent OMP requirements contained in the proposed amendment, whereas the community will benefit overall from the increased level of assurance provided from improved communication and improved overall awareness of the operations and practices conducted by the majority within the industry.

Lastly, some VOC and Toxic Air Contaminants (TACs) may be reduced as a result of incorporating additional best practices to reduce odors, but quantification of these benefits is difficult for State Implementation Plan (SIP) submittals, and thus PAR 1148.1 is not being considered for inclusion in the SIP.

**1-3** This comment explains that the letter highlights specific concerns about the proposed project and the Draft EA. The comment letter has been bracketed and individual responses to the specific concerns raised are contained in responses 1-4 through 1-39.

**1-4** This comment points out that because there are no emission reductions associated with PAR 1148.1, it is unclear as to how PAR 1148.1 carries out the goals of the AQMP to demonstrate compliance with federal and state ambient air quality standards. The District has a responsibility to protect community members from objectionable odors as well as attaining ambient air quality standards.

Although PAR 1148.1 is not driven by the AQMP, the current version of Rule 1148.1 implements Control Measure FUG-05 – Emission Reductions from Fugitive Emission Sources of the 2003 AQMP, and as such information on the achieved reductions under the rule is relevant to the background discussion. For additional discussion, see also Response 1-2.

**1-5** This comment points out that because there are no emission reductions associated with PAR 1148.1, it is unclear why the adverse health effects of VOCs is described in the Draft EA.

This comment repeats sentiments previously expressed in Comments 1-2 and 1-4. See Responses 1-2 and 1-4.

- 1-6** This comment requests clarification as to what the phrase “*due to an increased awareness of oil and gas production wells by the community...*” means and why Rule 1148.1 needs to be amended. This comment also claims that there is no evidence to suggest that the oil and gas industry has a past problem or has created a significant odor nuisance.

Appendix B of the Staff Report identifies a sampling of complaint history for oil and gas production facilities which is reflective of the local communities’ awareness and interest in the activities associated with them. Thus, page 1-1 of the Final EA has been clarified as follows: “However, due to an increased awareness of oil and gas production wells by the community, leading to multiple complaints and public comments requesting more proactive and preventative measures, SCAQMD staff has revisited the requirements in Rule 1148.1 to see what, if any, improvements can be made to the rule in order to minimize air quality and odor impacts to local residents and sensitive receptors that are often located nearby from ongoing operations that do not include drilling or well stimulation.” See also Response 1-2.

- 1-7** This comment claims that because no emission inventory was presented to suggest that there would be emission reductions associated with PAR 1148.1, the following statement on page 1-1 of the Draft EA is misleading and erroneous:

*“To prevent public odor nuisance and possible detriment to public health caused by exposure to VOC, TAC, and total organic compound (TOC) emissions from the operation and maintenance of oil and gas production facilities...”*

PAR 1148.1 includes rule language clarification as part of the purpose subdivision to indicate that TAC and TOC emission are reduced concurrent with the VOC emission reductions achieved by the existing rule and do not represent any additional reductions targeted as part of the proposed amendment. In addition, the purpose subdivision of PAR 1148.1 includes a reference “to prevent public nuisance and possible detriment to public health caused by exposure to such emissions.” As such, the possible detriment specifically refers to exposure to emissions related to a public nuisance. See also Responses 1-2 and 1-4.

- 1-8** This comment restates how CEQA defines a project and requests clarification as to what the physical change on the environment would be as a result of the project. This comment also claims that even though there is no inventory provided to allow for an adequate analysis, SCAQMD staff indicated at the Stationary Source Committee meeting that PAR 1148.1 would result in emission reductions.

PAR 1148.1 was discussed at two Stationary Source Committee meetings held on February 20, 2015 and April 17, 2015, but emission reductions from reducing odor nuisance potential was only discussed at the latter meeting. From the minutes of the April 17<sup>th</sup> meeting, SCAQMD staff explained that the proposal (PAR 1148.1) is focused on reducing odor nuisance potential which in turn would have the potential to reduce emissions. However, the potential to reduce emissions through odor minimization cannot be quantified. Nonetheless, CEQA does not preclude the use of a qualitative analysis to evaluate the potential environmental effects of a proposed project. As such, the analysis in the Final EA quantifies the environmental effects whenever data is available and qualitatively analyzes the remainder based on available information at the time of publication.

- 1-9** This comment claims that the necessity for amending Rule 1148.1 is unclear because more than 1,000 wells were drilled within the last 12 months and there were no violations issued during this time frame for the 473 oil and gas facilities that operate within SCAQMD's jurisdiction.

This comment repeats sentiments previously expressed in Comment 1-2. See Response 1-2.

- 1-10** This comment claims that the proposal to amend Rule 1148.1 is duplicative and unnecessary because the oil and gas industry is also subject to and complies with SCAQMD Rule 402 –Nuisance.

Page 1-6 of the Final EA includes a discussion on Rule 402 - Nuisance, which is included as being applicable to oil and gas production facilities. See also Response 1-2.

- 1-11** This comment claims that if there are emission reductions associated with PAR 1148.1 then they should be quantified and included or the statements that refer to reductions in VOC, TAC, and TOC emissions should be removed from the EA.

This comment repeats sentiments previously expressed in Comment 1-2. See Response 1-2.

- 1-12** This comment requests clarification as to how the installation of a rubber grommet during maintenance or drill piping replacement activities is relevant to a potential odor nuisance.

The use of a rubber grommet has been established through operating permits as a best practice for removing excess liquid from outside of drill piping, production tubing and sucker rods during removal. Excess volatile liquid is a contributor to emissions and related odorous emissions during such activities, and as such, is a potential odor nuisance source.

- 1-13** This comment requests clarification as to what instrumentation is used to determine a confirmed odor event.

A confirmed odor event is defined by PAR 1148.1 as “an occurrence of odor resulting in three or more complaints by different individuals from different addresses, and the source of the odor is verified by District personnel.” Odor has been defined by PAR 1148.1 as “the perception experienced by a person when one or more chemical substances in the air come into contact with the human olfactory nerves.” As such, a confirmed odor event is determined by the complainants and verified by District personnel through their respective sense of smell, consistent with the underlying investigative process used to address complaints under Rule 402 – Nuisance, for odors.

- 1-14** This comment claims that Table 1-1 is misleading because it identifies the requirement for an alternative fuel or electric powered workover rig. This comment also claims that the title of Table 1-1 is misleading because there are no significant adverse effects and no mitigation measures identified in the Draft EA.

Subsequent to the release of the Draft EA for public review and comment, additional revisions were made to PAR 1148.1 that resulted in the removal of the requirement for the use of an alternative fuel or electric powered workover rig as part of an OMP. As such, Table 1-1 no longer contains the requirement for an alternative fuel or electric powered workover rig. Relative to the comment that the title is misleading, the commentator has confused the odor monitoring and mitigation requirements that are in PAR 1148.1 and are part of the project’s design versus requiring mitigation and monitoring in response to significant adverse effects identified in a CEQA analysis as a result of implementing the project. The commentator is correct in that no significant adverse effects were identified in the Draft EA. Because PAR 1148.1 would not be expected to cause significant adverse environmental impacts for any topic area, mitigation measures are not required and therefore, were not included in the Draft EA.

The Odor Monitoring and Mitigation Requirements of Table 1-1 refer to PAR 1148.1 requirements associated with an Odor Mitigation Plan and not to any CEQA related elements. Please note that the latest version of PAR 1148.1 no longer includes alternative-fuel or electric powered workover rigs as an element of an Odor Mitigation Plan.

- 1-15** This comment claims that the analysis in Appendix B of the Draft EA contains emission reductions that are exclusive to the use of an electric workover rig and were the premise for the entire analysis even though this requirement was removed from the rule. This comment requests the development of a new emission inventory and a recirculation of the Draft EA so that the public has sufficient time to review the significant new information.

Emission reductions from alternative-fuel or electric rigs was not the basis for the proposed amendment and the emission inventory presented is only for CEQA purposes to discuss potential environmental impacts. As the commenter noted as a part of several comments, PAR 1148.1 is not expected to yield quantifiable emission reductions.

While it is correct that the calculations in Appendix B focus on the consequences of utilizing an electric workover rig, Appendix B also analyzes the adverse effects of utilizing alternate fuel workover rigs. Thus, the analysis shows both the potential benefits and adverse effects that may occur. However, as explained in Response 1-14, subsequent to the release of the Draft EA for public review and comment, additional revisions were made to PAR 1148.1 that resulted in the removal of the requirement for the use of an alternative fuel or electric powered workover rig as part of an OMP. By removing this requirement from PAR 1148.1, the adverse effects and benefits analyzed in Appendix B will not occur. Nonetheless, the analysis remains in the EA because it represents a worst-case analysis.

Other changes to PAR 1148.1 subsequent to the release of the Draft EA were proposed and the analysis has been revised to reflect these changes. In particular, the following modifications were made to the proposed project: 1) new paragraph (d)(3) has been added to require the pump out or removal of organic liquid accumulated in a well cellar the same day in the event the well cellar has been verified as a source of odors; 2) new paragraph (d)(14) has been added to require a facility operator to conduct and report a specific cause analysis for a confirmed oil deposition event; 3) new paragraph (e)(5) has been added to require monthly TOC measurements on any component identified as a potential odor nuisance and if a qualifying leak is identified, to require the repair, replacement, or removal from service the leaking component; and, 4) clause (f)(2)(C)(iv) has been revised to no longer specify covering of drill piping, production tubing and sucker rods; instead the new odor monitoring and mitigation plan specifications would require any removed drill piping, production tubing and sucker rods to be stored in a manner that would minimize emissions, either within an enclosed area, or by some other equivalent method.

Of these four changes to PAR 1148.1, industry has provided comments relative to item 1) to the effect that requiring the pump out or removal of organic liquid accumulated in a well cellar to occur the same day when the well cellar has been verified as a source of odors may cause an additional vacuum truck trip to the affected facility. Thus, the Draft EA has been revised to include an analysis of the potential adverse effects of additional vacuum truck trips and these additional assumptions and calculations can also be found in Appendix B.

Finally, the three remaining changes to PAR 1148.1 subsequent to the release of the Draft EA for public review and comment (see items 2 through 4) were determined to be procedural in nature and as such, would not be expected to cause any physical changes that that could cause secondary adverse environmental effects.

Staff has reviewed the modifications to the proposed project and concluded that none of the modifications constitute significant new information or a substantial increase in the severity of an environmental impact, nor provide new information of substantial importance relative to the draft document. In addition, revisions to



the proposed project in response to verbal or written comments would not create new, avoidable significant effects. As a result, these minor revisions do not require recirculation of the document pursuant to CEQA Guidelines §15073.5 and §15088.5.

See also Response 1-2 regarding the purpose of PAR 1148.1.

- 1-16** This comment claims that Table 1-1 is confusing because it includes leak detection and repair (LDAR) requirements even though LDAR requirements are contained in Rule 1173.

Oil and gas production facilities are currently subject to Rule 1173. PAR 1148.1 includes requirements that are more stringent than Rule 1173 as part of the Odor Mitigation Requirements under an Odor Mitigation Plan and does not reflect any amendment to Rule 1173. It is also noted that recent revisions to PAR 1148.1 add even more stringency to LDAR requirements above and beyond Rule 1173 if certain conditions are met. Specifically, Table 1-1 proposes more stringent LDAR requirements for PAR 1148.1 than what is currently required by Rule 1173 by reducing the required repair times for components subject to Rule 1173 LDAR to the lowest schedule of one calendar day with an extended repair period of three calendar days instead of the seven day repair time allowance and seven day extended repair period.

- 1-17** This comment requests clarification as to how enclosures or tarping have anything to do with reducing odor from removed drill piping and drill rods. This comment also asks for the reasoning behind why the Draft EA does not contain an analysis employing an enclosure as a compliance method.

As explained in Response 1-12, excess volatile liquid is a contributor to emissions and related odorous emissions during workover activities, and as such, is a potential odor nuisance source. For this reason, PAR 1148.1 requires the use of a grommet to remove any excess liquid from outside of the drill piping, production tubing, and sucker rods during removal. Further, managing the removed drill piping, production tubing and sucker rods through means such as storing within an enclosed area or other equivalent method to minimize exposure to crosswinds will reduce evaporation rates from any residue, thereby reducing peak releases and associated potential odor impacts. This requirement would apply only to those facilities subject to an Odor Mitigation Plan and where the facility identifies the removed drill piping, production tubing or sucker rods as a potential odor nuisance source, and the use of an enclosure or equivalent is determined to be feasible and effective in addressing the specific cause of the confirmed odor events or notice(s) of violation that resulted in the requirement for plan submittal.

When removing drill piping, production tubing or sucker rods during maintenance, the drill piping, production tubing and sucker rods are first temporarily staged (e.g., stored vertically) on the rig until they can be moved to an area on the property that has enough space to handle drill piping, production

tubing and sucker rod lengths up to 30 feet. Facilities already have designated areas where removed drill piping, production tubing and sucker rods are stored. Some facilities have an existing enclosed storage area for this purpose while others store the removed drill piping, production tubing and sucker rods out in the open. The proposed requirement in PAR 1148.1 for an enclosure or equivalent for storing the removed drill piping, production tubing and sucker rods would only apply in the following circumstances: 1) the facility is subject to an OMP; 2) the facility identifies the removed drill piping, production tubing or sucker rods as a potential odor nuisance source; and, 3) the use of an enclosure or equivalent is determined to be feasible. The purpose of the enclosure or equivalent would serve as a wind barrier to minimize the potential for a crosswind to disperse odors from any residue on the drill piping, production tubing and sucker rods across and offsite the property.

Subsequent to the release of the Draft EA, PAR 1148.1 was revised to clarify that an operator, would have the option of storing the removed drill piping, production tubing and sucker rods either within an enclosed area, or by some other equivalent method that acts as a wind barrier such as a covering or a freestanding wind screen, for example, in lieu of limiting the type of an equivalent method option in PAR 1148.1 to just a tarp. The Draft EA does not contain an analysis of constructing a new enclosed storage area because if an affected facility already has an enclosed storage area, a new one would not be needed since the existing enclosure would suffice. Further, if an affected facility already has a storage area on the property, all the facility would need to do is employ an equivalent method such as a covering or freestanding wind screen to provide a wind barrier. Because these would be the easiest and least expensive options, the analysis assumes that an affected facility would likely employ some kind of equivalent covering or wind screen in lieu of constructing an enclosed storage area.

- 1-18** This comment claims that even though the rule specifically lists an enclosed structure as a potential compliance option, no environmental analysis of the enclosed structure was included in the Draft EA. This comment also claims the CEQA requires all indirect environmental impacts to be evaluated and to be conservative, the analysis should have assumed that some portion of the affected facilities would build enclosures and the analysis should have evaluated those construction impacts. This comment inquires as to what measures were taken to support the claim that facility operators would not construct new storage areas. This comment inquires as to whether facilities were surveyed or questioned about what actions their operators might take to comply with this part of the rule.

Contrary to the comment, the language in PAR 1148.1 does not require or specify a building or storage shed as an enclosure. An enclosure can be a simple, temporary, portable wind barrier such as a covering or freestanding wind screen and does not need to be a permanent building, per se. Further, as explained in Response 1-17, an enclosure or equivalent for removed drill piping, production tubing and sucker rods would only be required under limited circumstances. Considering that workover activity is typically limited in duration, temporary

portable tenting may be also considered a feasible option in lieu of a more permanent enclosure. Certain facilities, especially those in urban areas, already store removed drill piping, production tubing and sucker rods in areas that minimize exposure to crosswinds.

The Draft EA assumed that there could be three facilities that may become subject to an OMP based on their past complaint histories. Thus, for these three facilities, if the removed drill piping, production tubing or sucker rods are identified as a potential odor nuisance source, then each facility operator would need to determine if the use of an enclosure or equivalent would be feasible and effective to prevent crosswinds flowing across the removed drill piping, production tubing and sucker rods while these items are being stored.

- 1-19** This comment requests clarification as to how the determination was made in the Staff Report which claims that covering drill rods and piping with plastic tarping is the preferred option. The comment extrapolates the data provided in the Staff Report to say that 473 facilities would each need six tarps twice a year and that the deliveries of these tarps along with the associated air emissions was not analyzed in the Draft EA.

Reference to the use of tarps has been removed from the Final Staff Report and PAR 1148.1, and this language is no longer included in the Final EA. Contrary to the comment, as explained in Response 1-18, the Draft EA assumed, based on past complaint histories, that there could be three facilities that may become subject to an OMP and that each facility could have six wells that would be maintained or reworked twice each year. Thus, only three facilities would be expected to use either an enclosure or equivalent to provide an effective wind barrier, such as a covering or freestanding wind screen, in lieu of an enclosed area in the event that the removed drill piping, production tubing and sucker rods are identified as a potential odor nuisance source, and the use of an enclosure equivalent such as a covering or freestanding wind screen may be feasible in preventing crosswinds from flowing across the removed drill piping, production tubing and sucker rods while these items are being stored.

If a facility operator chooses to utilize a covering such as a tarp as an equivalent enclosure, then one covering per well would be needed twice per year (e.g., 1 covering x 6 wells x 2 workovers = 12 coverings). Further, if all three facility operators choose to utilize coverings, then a total of 36 coverings per year would be needed instead of the commentator's alleged 5,676 coverings. Because the OMP would be prepared in advance, facility operators would have advance knowledge to be able to coordinate amongst their existing supply trips or delivery schedules to also include the purchase of 12 coverings per facility that may be needed for future removal and storage of drill piping, production tubing and sucker rods. Thus, any trips to purchase the coverings would be covered by existing maintenance trips to obtain supplies.

In the event that each facility operator would need to make an unplanned trip to obtain coverings or have the coverings delivered by a supplier for the aforementioned purpose, the amount of unplanned trips needed per year could be one additional round-trip per facility. Even if three additional trips are needed to obtain or supply coverings over the course of one year, these trips would not be expected to occur on the same day for three separate facilities. Finally, because the calculations in Appendix B are very conservative in that they are based on the assumption that there could be three heavy duty vacuum trucks visiting three facilities on a peak day, any additional unplanned trips that may occur in order to obtain or supply coverings, would not be expected to exceed the peak daily trips currently analyzed in the document.

- 1-20** This comment claims that because there is no history of nuisance impacts from the oil and gas industry, PAR 1148.1 and its Staff Report do not contain substantiation to justify the goal to “minimize the potential for nuisance and odor impacts to local residents and sensitive receptors that are often located nearby from ongoing operations that do not include drilling.” This comment also claims that there is no evidence that any sensitive receptors have found the oil and gas source category to be a nuisance and therefore, requests substantiation as to how the SCAQMD knows that these facilities are located near sensitive receptors.

PAR 1148.1 defines sensitive receptor to “mean any residence including private homes, condominiums, apartments, and living quarters; education resources such as preschools and kindergarten through grade twelve (k-12) schools; licensed daycare centers; and health care facilities such as hospitals or retirement and nursing homes. A sensitive receptor includes long term care hospitals, hospices, prisons, and dormitories or similar live-in housing.” Appendix B of the Staff Report identifies facilities with a complaint history and also identifies the proximity to sensitive receptors as defined in PAR 1148.1. See also Response 1-2.

- 1-21** This comment claims that the following statement in the Draft EA is false and needs to be removed: “...the proposed project will continue to assist the SCAQMD’s progress in attaining and maintaining the ambient air quality standards for ozone.”

PAR 1148.1 includes additional rule language clarifications that improve the enforceability of the existing rule requirements, and as such, serve to continue to assist the SCAQMD’s progress in attaining and maintaining the ambient air quality standards for ozone. (Examples include: strengthening the safety exemption language, providing cross-references to other rules applicable to oil and gas production facilities, and clarifying recordkeeping requirements).

PAR 1148.1 is designed to enhance compliance activities in order to prevent emissions from hydrocarbons which are also a source of odors when released to the atmosphere. Thus, the prevention of odors is directly related to preventing

emissions that would otherwise contribute to the formation of ozone. For these reasons, the statement will remain in the Final EA.

- 1-22** This comment claims that a construction analysis should be included in the Final EA and that the following statement is incorrect because PAR 1148.1 requires an enclosure for used rods: *“PAR 1148.1 neither requires construction of new facilities nor requires physical modifications at existing facilities that would entail construction activities.”*

This comment is a repeat of the sentiments expressed in Comment 1-18. See Response 1-18.

- 1-23** This comment claims that the calculations in Appendix B and the data presented in Tables 2-2, 2-3, 2-4, and 2-5 of the Draft EA are no longer valid because the utilization of an electric workover rig is no longer required and there are no emission reductions associated with PAR 1148.1. This comment also claims that without the requirement for an electric workover rig, there are no environmental benefits from PAR 1148.1 and instead there are several potential adverse environmental impacts that have yet to be adequately addressed.

While it is correct that the use of an alternative fuel or electric powered workover rig is no longer a requirement in PAR 1148.1, the analysis which includes both benefits and adverse impacts relative to the use of an alternative fuel or electric powered workover rig will remain as part of the responses to the environmental checklist to represent a worst-case analysis. The Final EA has been revised to acknowledge this understanding. PAR 1148.1 still has environmental benefits by reducing the potential for odor nuisances. However, in response to the claim that there are several potential adverse environmental impacts that have yet to be adequately addressed, the commentator has not identified the impacts of concern. As such, SCAQMD staff is unable and not required to prepare a response to this comment.

- 1-24** This comment claims that there were no odor incidents within the last year at more than 473 facilities so it is not clear in the Draft EA when the three confirmed odor events occurred. This comment claims that because there were no odor incidents and no evidence of a nuisance problem, then the necessity of the amendment, a finding required by Health and Safety Code §40727, is called into question.

Because complaints need to be independent and associated with the same event, the Final EA has been clarified as follows: *“Past ~~compliance~~ complaint data for Rule 1148.1 facilities has shown that only three facilities experienced the potential equivalent of ~~more than~~ three or more confirmed odor events or received a Rule 402 NOV.”* See also Response 1-2.

- 1-25** This comment claims that while the electric workover rig component was removed from PAR 1148.1, the Draft EA claims that electricity generating

equipment could be installed to support the operation of an electric workover rig. This comment claims that the SCAQMD finds it more beneficial to generate more power in order to reduce odor impacts that have not occurred. This comment also claims that if a new power generating source is required, it should have been evaluated in the CEQA document. This comment claims that by not analyzing new power generating equipment in the CEQA is piecemealing and prohibited.

As explained in Responses 1-14, 1-15, and 1-23, while the electric workover rig component of the Draft EA was removed, the analysis for electric workover rigs as well as the analysis for alternative fuel workover rigs will remain in the document to represent a worst-case analysis. With regard to the remark that any electricity generating equipment that may be installed to support an electric workover rig (which currently do not exist) should be analyzed in this CEQA document, the discussion in Section III b) of the Draft EA explained that any new electricity generation within the district would require permitting and compliance with a multitude of SCAQMD rules and regulations and a separate CEQA evaluation to evaluate the effects of any proposal to install new electricity generating equipment. In other words, a CEQA evaluation and separate permitting analysis of new electricity generation equipment is beyond the scope of PAR 1148.1 and thus, is not included in this EA.

The commentator is incorrect in claiming that the lack of analysis for new power generating equipment is piecemealing. In actuality, piecemealing is when a project is divided up into smaller projects in order to qualify for an exemption and is prohibited by Public Resources Code §21159.27. The SCAQMD did not determine that the project or any portion would be exempt under CEQA but instead prepared an Environmental Assessment pursuant to its Certified Regulatory Program as promulgated in CEQA Guidelines §15251 (l). Further, the Final EA contains an analysis of the environmental effects of the future action of implementing PAR 1148.1 and the reasonably foreseeable consequences of the project.

SCAQMD staff is not aware of any current efforts to bring an electric or alternative fuel workover rig into commercial use, nor is SCAQMD staff aware of any such rigs under production or undergoing retrofit. Nonetheless, because electric and alternate fuel workover rigs are not reasonably foreseeable in that they do not currently exist, the SCAQMD conducted an analysis based on currently available diesel fuel usage data for diesel-fueled workover rigs and extrapolated that data to estimate the potential environmental impacts, both beneficial and adverse, of what may happen if electric and alternative fuel workover rigs are developed and are used. In particular, Table 2-9 (formerly numbered as Table 2-6 in the Draft EA) summarizes that 0.0003 MW of instantaneous electricity would be needed to supply three electric workover rigs, a miniscule and less than significant amount when compared to the amount of electricity supply available.

- 1-26** This comment claims that references to electric or clean fuel workover rigs in the CEQA document should be removed if the requirement has been removed from PAR 1148.1. This comment also claims that if the requirement for electric or clean fuel workover rigs remains in PAR 1148.1, then the analysis in the CEQA document is flawed because it does not analyze the secondary effects of installing new power generation facilities.

These comments repeat the sentiments expressed in Comment 1-25. See Response 1-25.

- 1-27** This comment agrees with the statement in Section III d) of the EA that says “PAR 1148.1 would not change any of the VOC/TOC/TAC reduction aspects currently in the rule...” and requests that the CEQA document contain a clarification that there are no emission reductions associated with PAR 1148.1. This comment also requests that references to furthering the goals of the AQMP or attaining ozone standards should be removed from the CEQA document because they are misleading and false.

These comments repeat the sentiments expressed in Comments 1-4, 1-7, 1-11, and 1-21. See Responses 1-4, 1-7, 1-11, and 1-21.

- 1-28** This comment claims that if the electric workover rig requirement remains in PAR 1148.1, then the energy analysis needs to be revised and the CEQA document needs to be recirculated. This comment also claims that approximately 68 workover rigs would need to be converted to electric workover rigs and that there is a potential to exceed utilities’ capacities to provide power. This comment requests clarification as to why the analysis assumes that only three workover rigs would need to be converted to electric since PAR 1148.1 applies to the entire industry. Lastly, this comment suggests that Table 2-6 be revised to accurately reflect the number of workover rigs operating in the Basin.

As previously explained in Response 1-14, the electric workover rig requirement as well as the alternative fuel workover rig requirement was removed from PAR 1148.1; thus, the energy analysis does not need to be revised and the CEQA document does not need to be recirculated. With regard to the comment that 68 workover rigs should have been analyzed, the commentator has misinterpreted the requirement in the OMP provision as applying to all workover rigs. Instead, the requirement that was initially proposed in PAR 1148.1 and then subsequently removed, would have required the use of an electric or alternative fuel workover rig only in the event that a facility would be required to prepare and obtain approval of an Odor Mitigation Plan in response to a confirmed odor event. Since historic complaint data shows that only three facilities would have potentially required an Odor Mitigation Plan, the analysis was based on the assumption that three electric or alternative fuel workover rigs might be utilized. For this reason, SCAQMD staff believes that the energy data based on the use of three electric workover rigs as presented in Table 2-6 (which has been renumbered in the Final

EA to Table 2-9) accurately reflects the potential electricity demand. See also Response 1-25.

- 1-29** This comment claims that PAR 1148.1 allows for the use of a storage shed which would require construction and the effects of constructing a storage shed should be evaluated under CEQA.

This comment repeats the sentiments previously expressed in Comments 1-17 and 1-18. See Responses 1-17 and 1-18.

- 1-30** This comment requests substantiation for how SCAQMD knows that the storage areas are flat or have been previously graded. This comment claims that any facility choosing to install a storage shed would need to excavate and grade the site.

As explained in Response 1-17, workover activities, which include the removal of drill piping, production tubing and sucker rods, are currently occurring at the affected facilities, and these facilities already have designated areas on their properties for storing these removed items. Because the length of drill rods, production tubing and sucker rods can be up to 30 feet, in order to safely store these items without risking them moving or rolling away, the area would need to be relatively level. Further, as explained in Responses 1-17 and 1-18, SCAQMD staff does not believe that a storage shed would be necessary in order to comply with the enclosure or equivalent requirement for the limited number of facilities.

- 1-31** This comment claims that the SCAQMD is requiring the use of 5,676 oversized tarps and because these tarps could come in contact with crude oil or by-products, they would need to be disposed of as hazardous waste and the CEQA document would need to further analyze this impact. This comment claims that the disposal of these tarps would be costly and there is a significant shortage of landfills permitted to accept hazardous materials. This comment claims that an analysis should be conducted to quantify the number of trips generated based on the site locations where the tarps would need to be delivered and that this impact is not addressed or quantified in the CEQA document. This comment questions how a non-significance determination was made when the quantity of hazardous waste was not assessed and compared to the capacity of designated landfills.

The commentator has misinterpreted the enclosure or equivalent requirement in PAR 1148.1 to apply to all facilities subject to PAR 1148.1. The commentator's estimate of the number of tarps that would be needed and the explanation for why this estimate is incorrect is addressed in Response 1-19. In addition, Response 1-19 addresses the estimated number of trips that may be needed to supply coverings for the removed drill piping, production tubing and sucker rods.

With regard to the claim that used tarps would need to be disposed of as hazardous waste, SCAQMD staff understands that it is current industry best practice during workover activities to use a grommet to remove excess liquid



from the drill piping, production tubing and sucker rods as they are being removed from the well. Further, new paragraph (d)(11) requiring the installation of a rubber grommet as part of a maintenance or drill rod/production tubing/sucker rod replacement activity that involves the use of a workover rig, would also help to minimize any excess liquid or residue coming off of the removed drill piping, production tubing and sucker rods. After the drill rods, production tubing and sucker rods are removed, they are temporarily staged vertically on the rig, so any free flowing liquid would not be expected to remain on these items prior to moving them from the rig to a storage area, although residue which may create odors may remain. For these reasons, SCAQMD staff does not believe that the tarps, if utilized, would come in contact with any free flowing liquid materials during the storage, and thus, would not require them to be treated as hazardous waste, if a facility operator chooses to dispose of the tarps. Further, since six coverings would be needed for six wells twice a year at three facilities (or 12 per facility), if each facility operator chooses to dispose of these coverings (36 in total), instead of reusing them, this small volume being disposed would not be expected to cause a significant exceedance of the capacity of designated landfills, even if each facility operator chooses to dispose of the coverings as hazardous waste.

- 1-32** This comment claims that if hydrogen sulfide (H<sub>2</sub>S) is being reduced as a result of PAR 1148.1, then the amount of reduction should have been quantified in the CEQA document. This comment claims that the CEQA document does not contain a quantification of any emission reductions needed for an adequate analysis.

Sulfur compounds such as hydrogen sulfide (H<sub>2</sub>S) and mercaptans contribute to odors from existing oil and gas operations. While CARB does not identify H<sub>2</sub>S as a toxic air contaminant (TAC) per se, CARB is evaluating H<sub>2</sub>S and considers this substance a potential candidate for TAC classification as part of an ongoing evaluation of carcinogenic and noncarcinogenic health effects, emissions and exposure in California<sup>16</sup>. In addition, because H<sub>2</sub>S is known odorous substance and a pollutant of concern from an accidental release perspective, H<sub>2</sub>S is listed in the accidental release provisions of section 112 (r) of the Clean Air Act. Substances regulated under section 112 (r) are anticipated to cause death, injury, or serious adverse affects to human health or the environment upon accidental release<sup>17</sup>. Thus, by incorporating additional best practices to reduce odors, PAR 1148.1 would further assist in minimizing emissions to the atmosphere by improving upon compliance and monitoring requirements to minimize the potential for odors. For these reasons, some VOC, TACs, and H<sub>2</sub>S may be reduced as a result, but quantification of these benefits is difficult for SIP submittals, and thus, PAR 1148.1 is not being considered for inclusion in the SIP.

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<sup>16</sup> CARB, Toxic Air Contaminant (TAC) Identification List, Quick Reference Format, December 1999.  
<http://www.arb.ca.gov/toxics/quickref.htm>

<sup>17</sup> EPA, Report to Congress on Hydrogen Sulfide Air Emissions Associated with the Extraction of Oil and Natural Gas, October 1993.

With regard to the comment that the CEQA document does not quantify any emission reductions, this comment is a repeat of the sentiments expressed in Comments 1-4, 1-5, 1-7 and 1-11. See Responses 1-4, 1-5, 1-7 and 1-11.

- 1-33** This comment claims that PAR 1148.1 allows for the use of a storage shed which would require construction and the effects of constructing a storage shed should be evaluated under CEQA.

This comment essentially repeats the sentiments expressed in Comments 1-17 and 1-18. See Responses 1-17 and 1-18.

- 1-34** This comment claims that PAR 1148.1 allows for the use of a storage shed which would require construction and the effects of constructing a storage shed should be evaluated under CEQA.

This comment essentially repeats the sentiments expressed in Comments 1-17 and 1-18. See Responses 1-17 and 1-18.

- 1-35** This comment claims that the delivery of 5,767 tarps needs to be addressed. This comment inquires as to the supplier of the tarps and claims that the distance that would be traveled in order to deliver the tarps to the facilities and to later deliver the used tarps to a hazardous waste landfill should be analyzed in the CEQA document. This comment also claims that if tarps are not delivered, it would be because a facility has chosen to comply by building a storage shed and workers, deliveries and equipment need to be addressed.

With regard to the number of tarps that were estimated, the delivery of the tarps, and the disposal of the tarps, see Response 1-31. With regard to the commentator's assumption that storage shed will be built if tarps are not utilized, see Responses 1-17 and 1-18.

- 1-36** This comment claims that the Draft EA lacks detail or quantification to make an adequate finding of significance under CEQA. This comment also claims at a footnote referencing documentation that is more than 12 years old indicates that the documentation is outdated and not an effective tool for determining cumulative significance.

The comment about the lack of quantification in the Draft EA has been addressed in Responses 1-2, 1-8, 1-15, 1-31 and 1-32. With regard to the footnote with 12 year old documentation, the commentator did not identify the specific footnote of concern and there are multiple footnotes to references from years ranging from 2003 to 2015. Thus, SCAQMD staff is unable to provide a specific response to this claim. Nonetheless, an age of a particular resource does not automatically mean that the information should be discounted or invalidated if the data is applicable to the project. When preparing the CEQA document, SCAQMD staff has used its best efforts to find out and rely upon the best available data and resources and disclose all that it reasonably can to present facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.

- 1-37** This comment requests the removal of the phrase “*possible detriment to public health caused by exposure to VOC, TAC, and TOC emissions*” from the Draft EA because it is false and misleading and because it contradicts other statements that confirm the amendments are administrative and do not reduce emissions in any way.

This comment repeats the sentiments previously expressed in Comment 1-7. See Response 1-7.

- 1-38** This comment expresses appreciation for the opportunity to comment. This comment also requests that the CEQA analysis be re-done and recirculated to remove the reference to electric workover rigs and include an analysis related to the thousands of tarps and storage sheds that are required to included as part of PAR 1148.1.

These comments repeat the sentiments previously expressed in Comments 1-14, 1-15, 1-17, 1-18, 1-19, 1-23, and 1-26. See Responses 1-14, 1-15, 1-17, 1-18, 1-19, 1-23, and 1-26.

- 1-39** This comment requests the removal of any reference to emission reductions and encourages the SCAQMD to focus on rule development that actually attains and maintains ambient air quality standards. This comment claims that PAR 1148.1 is an administrative, costly burden with no environmental benefits.

The references to emission reductions in the CEQA document pertain to the environmental impact analysis of potential secondary effects of implementing PAR 1148.1 and do not reflect any SIP creditable actions. With regard to the claim that PAR 1148.1 has no environmental benefits, see Response 1-2.

**COMMENT LETTER No. 2**

**From:** Joyce Dillard [mailto:dillardjoyce@yahoo.com]  
**Sent:** Thursday, May 28, 2015 4:17 PM  
**To:** Barbara Radlein  
**Subject:** Comments AQMD Draft EA-Proposed Amended Rule 1148.1–Oil and Gas Production Wells due 5.28.2015

Potential Environmental Factors include:

- Biological Resources
- Hydrology and Water Quality
- Public Services

} 2-1

Watersheds and the Basin Plans are not addressed.

Not clear if the use of wastewater under urban runoff and the potential uses for recycled water or irrigation water. Another term used is or surface water and drainage. LA Regional Water Quality Control Board in issuing the LA Municipal Separate Storm Sewer System (MS4) Discharges Order NO. R4-2012-0175 NPDES Permit No. CAS004001 allows for capture of such water and reuse for water quality and Total Maximum Daily Load reductions. Basin Plan is divided into watersheds with Watershed Management Areas requiring Watershed Management Plans or Enhanced Watershed Management Plans.

} 2-2

Urban runoff appears to be from non-point sources. Does this document consider these wells point sources with their own permit or non-point sources subject to this runoff and water recycling collection?

} 2-3

Water quality monitoring is necessary yet excluded in this document.

} 2-4

More than just Odor Mitigation, the VOC emissions from wastewater systems may affect water quality, public health and biological resources such as birds, wildlife, trees and plants.

} 2-5

Joyce Dillard  
P.O. Box 31377  
Los Angeles, CA 90031

**RESPONSES TO COMMENT LETTER #2  
(Joyce Dillard – May 28, 2015)**

- 2-1** The comment implies that the Draft EA should consider potential environmental factors for the topics of biological resources, hydrology and water quality, and public services without explaining the reasoning for why the commentator believes that there would be environmental factors to consider relative to the proposed project.

The Draft EA analyzed the effects of the proposed project for all 17 environmental topics, which include the topics of biological resources, hydrology and water quality, and public services. The proposed project was shown to have no impact on the topics of biological resources, hydrology and water quality, and public services.

- 2-2** The comment states that the Draft EA did not address watersheds and basin plans. The comment also seeks clarification as to potential uses for recycled or irrigation water.

Because the proposed project has no provision that would increase demand for water or increase the generation or recycling of wastewater, urban runoff or stormwater, watersheds and basin plans would also not be affected by the proposed project. Further, as explained in Section IX of the EA, the proposed project would not require the construction of additional water resource facilities, increase the need for new or expanded water entitlements, or alter existing drainage patterns. For these same reasons, the proposed project would not substantially deplete groundwater supplies. Consequently, the proposed project is not expected to interfere substantially with groundwater recharge.

- 2-3** The comment states that urban runoff appears to come from non-point sources and inquires as to whether the Draft EA considers wells to be point sources with their own permit or non-point sources subject to runoff and water recycling collection requirements.

This comment appears to be directed at water impacts of existing wells, and not any adverse impacts of the proposed rule amendments. The proposed project has no provision that would affect urban runoff or require water recycling. As explained in Section IX of the EA, PAR 1148.1 would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Since compliance with PAR 1148.1 does not involve water that would generate wastewater processes, there would be no change in the composition or volume of existing wastewater streams from the affected facilities. Thus, PAR 1148.1 is not expected to require additional wastewater disposal capacity, violate any water quality standard or wastewater discharge requirements, or otherwise substantially degrade water quality. For these reasons, the EA is not required to identify wells as point- or non-point sources.

- 2-4** The comment states that water quality monitoring should have been addressed in the Draft EA. As previously explained in Responses 2-3 and 2-4, because the proposed project does not contain any provisions that would alter how oil and gas production facilities currently process and monitor water quality, the EA concluded that the proposed project would not violate any water quality standards, waste discharge requirements, exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board, or otherwise substantially degrade water quality.
- 2-5** The comment states that VOC emissions from wastewater systems may affect water quality, public health and biological resources such as birds, wildlife, trees and plants. The proposed project has been crafted to reduce the number of verified odor complaints required before an affected facility is required to take corrective action. The proposed project does not, however, contain any provisions that would require affected facilities to alter their existing wastewater systems.

BOARD MEETING DATE: September 4, 2015

AGENDA NO. 38

*(Continued from July 10, 2015 Board Meeting)*

**PROPOSAL:** Amend Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers

**SYNOPSIS:** Rule 1148.2 was adopted April 5, 2013 to establish requirements for owners or operators of oil and gas wells to notify the Executive Officer when conducting well drilling, well reworking, hydraulic fracturing, and other well production stimulation activities. The rule also includes reporting requirements for operators and chemical suppliers to report trade secret and non-trade secret chemicals used. The California Department of Conservation, through its Division of Oil, Gas, and Geothermal Resources (DOGGR) has approved Well Stimulation Treatment Regulations in response to the passage of SB 4 on December 30, 2014. Chemical reporting requirements for chemicals claimed as trade secret are different between the new DOGGR regulation and Rule 1148.2. Proposed Amended Rule 1148.2 includes revisions to the chemical reporting requirements to be consistent with DOGGR's regulation.

**COMMITTEE:** Stationary Source, April 17, 2015, Reviewed

**RECOMMENDED ACTIONS:**

Adopt the attached resolution:

1. Determining that the proposed amendments to Rule 1148.2 are exempt from the California Environmental Quality Act; and
2. Amending Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers.

Barry R. Wallerstein, D.Env.  
Executive Officer

PF:SN:EE

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**Background**

Rule 1148.2 was adopted on April 5, 2013 and established requirements for operators of oil and gas wells to notify the Executive Officer when conducting well drilling, well

reworking, or well completion activities, which includes hydraulic fracturing, maintenance and matrix acidizing, gravel packing activities, and any combination of these well completion activities. Rule 1148.2 requires well operators to electronically notify the SCAQMD of any well drilling, rework, or well completion activity at a minimum of 24 hours prior to the start date of the activity. Operators are also required to report information on the chemicals used such as the trade name product, the chemical ingredients, and if the chemical ingredient is a toxic air contaminant. Under Rule 1148.2, chemical suppliers are also required to report chemicals that are supplied to an operator, including identifying when chemicals are claimed as trade secret and the basis of that claim. Since the implementation of Rule 1148.2 there have been approximately 11,500 claims of trade secret for 120 trade name products representing 200 chemical ingredients.

On September 20, 2013, Governor Brown signed SB 4 – a bill establishing a structure for regulating advanced well stimulation treatments – which are treatments of a well designed to enhance oil and gas production or recovery by increasing the permeability of the formation such as hydraulic fracturing and certain forms of acidizing. As required by SB 4, DOGGR developed interim regulations that went into effect in California on January 1, 2014. The final DOGGR regulations were approved in December 2014, and will go into effect on July 1, 2015.

Under DOGGR's SB 4 regulations, operators shall report identities and concentrations of chemicals used in well stimulation treatments. Under DOGGR's regulation, well stimulation treatments include hydraulic fracturing, acid fracturing, and acid matrix stimulation treatments. The applicability of SCAQMD's Rule 1148.2 is broader than the well treatments applicable under DOGGR's SB 4 regulations in that it also covers drilling, gravel packing, and maintenance acidizing. While setting forth chemical reporting requirements, SB 4 also sets limits on information that can be claimed trade secret with respect to well stimulation treatment fluids. The law states that none of the following are protected as trade secret: 1) identities and CAS numbers of chemical ingredients of additives used in well stimulation treatments; 2) concentrations of additives within well stimulation treatment fluids; 3) any air or other pollution monitoring data; 4) health and safety data associated with well stimulation treatment fluids; and, 5) the chemical composition of the flowback fluid. One key distinction between the chemical reporting under Rule 1148.2 and DOGGR's regulation, is that the trade name product is disassociated from the chemical ingredient, while under Rule 1148.2 the reporting of chemical ingredients is linked to the trade name product. The SCAQMD staff has been informed by DOGGR staff that operators and chemical suppliers have not made any claims of trade secret under DOGGR's SB 4 regulation.

Separate from this rulemaking, but related to Rule 1148.2, SCAQMD staff has been providing updates on the implementation of Rule 1148.2 to the Working Group and Stationary Source Committee. During the adoption of Rule 1148.2 on April 5, 2013, the SCAQMD committed to report back to the Stationary Source Committee within 2 years



of rule adoption, findings and recommendations for the need, if any, for emission controls or regulatory efforts for well drilling, well completion, and well reworks. During the last two years staff has conducted site inspections, sampling, monitoring, and data evaluation of well events applicable under Rule 1148.2. The findings from this evaluation include (1) elevated levels of benzene, toluene, ethylbenzene, xylene, and Non-Methane Organic Compounds (NMOC) openings at catch basins and temporary storage tanks; (2) diesel PM emissions from on-site engine usage; and (3); best management practices (BMPs) to reduce potential impacts from spillages or leakages. BMPs which potentially reduce impacts from these findings include: (1) use of carbon canisters for Adler Tanks and keeping hatches closed or covered from all tanks to reduce NMOC emissions; (2) use of plastic totes or similar intermediate bulk containers for adding dry materials thereby reducing opportunity for spillage; (3) use of plastic sheet ground covers to capture liquid leaks and spills of fluids and dry materials; and (4) use of low emission on-site diesel engines. In addition, SCAQMD staff will be proposing to amend Rule 1148.2 no later than mid-2016 to address these findings. Staff will also report to the Stationary Source Committee after the July Board meeting.

### **Proposal**

Proposed Amended Rule 1148.2 proposes to revise the chemical reporting requirements for drilling, well rework, and well completion chemical ingredients and trade name products in order to make the rule more consistent with SB 4 and DOGGR's reporting structure, while still requiring the reporting of additional activity types and additional chemical information not covered by SB 4. PAR 1148.2 will: 1) disaggregate the reporting of the trade name product from the chemical ingredients within the product; 2) no longer require the reporting of the chemical mass concentration within the trade name product, and instead require the mass of each chemical ingredient; and 3) consistent with SB 4, information that cannot be claimed trade secret will be made available to the public on the SCAQMD's website. It is expected that by disaggregating the trade name product from the chemical ingredient, suppliers will make fewer trade secret claims which will provide greater transparency to the public regarding the chemical ingredients and their mass.

During the rulemaking process, the SCAQMD staff received comments from some community representatives to extend the notification period from 24 to 72 hours to allow the public additional lead time prior to a well event. As a result, PAR 1148.2 will require operators to notify the Executive Officer at least 72 hours (and up to 10 days) before a well event. Proposed Amended Rule 1148.2 also proposes changes to provisions for extending the well event start time, allowing the operator to extend a well event start time in 24-hour increments. A well operator can extend the start time five times before the operator is required to submit a new 72-hour notification. Additional minor changes to rule language also will be made for clarity and consistency.

In addition to the proposed amendments, some environmental and community representatives requested changes to the Rule 1148.2 Public Portal on the SCAQMD's

website to improve searches and queries for notifications and chemical reports. In response to requests, the SCAQMD staff will be revising the Rule 1148.2 Public Portal to add additional search criteria such as Facility ID, location city, and type of well activity (e.g., acidizing, drilling). In response to an additional request, the Public Portal will also be revised to provide the Emission Source Report. SCAQMD staff has initiated the work to make these revisions and will send a notice to all users upon completion, which is expected to be within the fourth quarter of 2015.

### **Affected Sources**

Based on an evaluation of SCAQMD records of the Rule 222 Filing Program for the “Oil Production Well Group” category, there are 242 facilities operating approximately 4,320 onshore oil and gas wells in the South Coast Basin. Based on notifications received since the adoption of Rule 1148.2, there are approximately 60 different facilities representing 22 operators that have provided Rule 1148.2 notifications.

### **Impact Assessment**

Implementation of Proposed Amended Rule 1148.2 will not result in emission reductions as it is an administrative rule with no pollution control requirements or control measures. The purpose of PAR 1148.2 is to revise the current reporting requirements for drilling, well rework, and well completion chemicals and trade name products in order to be more consistent with SB 4 and DOGGR’s reporting structure. Additional minor changes to rule language have been also made for clarity and consistency.

### **Public Process**

Proposed Amended Rule 1148.2 was developed through a public process. The Rule 1148.2 Working Group was reconvened to discuss the proposed amended rule in greater detail and provide input to SCAQMD staff throughout the rule development process. The Working Group is comprised of a variety of industry representatives, environmental and community groups, and public agency representatives. The Working Group met three times: April 8, 2015, May 19, 2015, and June 3, 2015. Additionally, a Public Workshop was held on April 15, 2015 at the SCAQMD headquarters to present the proposed amended rule and receive public comment.

### **Key Outstanding Issues**

Through the rule development, there were two issues raised: (1) including water injection wells in the proposed amended rule; and (2) the number of 24-hour extensions allowed for well notifications.

#### *Water Injection Wells*

During the rule development, some environmental and community representatives have commented that Rule 1148.2 should include water injection wells at oil production fields since certain well activities, such as acidizing, occur at both water injection wells and oil and gas production wells. When Rule 1148.2 was adopted, water injection wells were not included since SCAQMD staff was informed that there is no flowback from

water injection wells, and flowback fluids or fluids that returned to the surface were the primary air quality concern. Community representatives have commented that they are concerned about the equipment and chemicals that are being used, and are asking to be notified. SCAQMD staff has explained that additional time is needed to assess the potential sources that could be affected if Rule 1148.2 includes water injection wells. The adoption resolution includes a commitment for staff to return to the Stationary Source Committee regarding water injection wells in the first quarter of 2016 and potential amendments to Rule 1148.2 no later than mid-2016.

#### Notification Extensions

PAR 1148.2 notification provisions allow operators a 24-hour window from the originally projected start date and time to begin the well event, plus five 24-hour extensions, before a new notification must be filed. Operators have commented that five 24-hour extensions is too limiting, because there are last-minute delays due to scheduling equipment, delays in receiving equipment, and operational delays at the site, to name a few. Based on approximately 2,400 notices, nearly 60 percent of all notices were rescheduled. For nearly 90 percent of the revisions, the new start date was within three days or less of the original start date. Additionally, approximately 90 percent of the events undergo two revisions or less. Environmental and community groups have commented that operators should be limited to two 24-hour extensions, to provide a shorter window of time for the public to work around. In addition, community representatives have commented that requiring signage at the site, particularly sites where well activities are close to residents, would be beneficial. The SCAQMD staff believes that five 24-hour extensions provides the operator with sufficient flexibility while minimizing potential re-noticing and waiting an additional 72 hours.

#### **California Environmental Quality Act (CEQA)**

The SCAQMD has reviewed the proposed project pursuant to CEQA Guidelines §15002 (k) – General Concepts, the three-step process for deciding which document to prepare for a project subject to CEQA and CEQA Guidelines §15061 – Review for Exemption, procedures for determining if a project is exempt from CEQA. Because the SCAQMD is amending Rule 1148.2 to align it with the requirements in SB 4, without exercising discretion with regard to the proposed amendments, the project is considered to be ministerially exempt from CEQA pursuant to CEQA Guidelines §15268 – Ministerial Projects. Furthermore, the SCAQMD has determined that it can be seen with certainty that there is no possibility that the proposed project may have any significant effects on the environment, and is therefore, also exempt pursuant to CEQA Guidelines §15061 - Review for Exemption, paragraph (b)(3) – “general rule” exemption. A Notice of Exemption has been prepared pursuant to CEQA Guidelines §15062 - Notice of Exemption. If the project is approved, the Notice of Exemption will be filed with the county clerks of Los Angeles, Orange, Riverside and San Bernardino counties.

### **Socioeconomic Analysis**

PAR 1148.2 would revise the current reporting requirements for drilling, well rework, and well completion chemicals and trade name products in order to increase the notification submission timeframes, streamline the reporting process, and be more consistent with SB 4 and DOGGR's reporting structure. Thus, implementation of PAR 1148.2 will not result in emission reductions as it is administrative in nature and cost impacts are expected to be minimal, and as such there are no significant adverse socioeconomic impacts. The SCAQMD staff has worked with the Working Group members to streamline chemical reporting requirements to minimize impacts and has also taken steps to structure the reporting process to be nearly identical to the current system to ensure a smooth transition for operators and suppliers. Increasing the minimal timeframe for notifications from 24 to 72 hours with five 24-hour extensions may require additional re-notifications, however, staff has streamlined the notification portal to populate most information for extensions to minimize any significant costs. Costs associated with the proposed amendments are projected to be minimal. Therefore, no cost estimates are provided.

### **AQMP and Legal Mandates**

Pursuant to Health and Safety Code §40460 (a), the SCAQMD is required to adopt an Air Quality Management Plan (AQMP) demonstrating compliance with all federal regulations and standards. The SCAQMD is required to adopt rules and regulations that carry out the objectives of the AQMP. Proposed Amended Rule 1148.2 is not a control measure of the 2012 AQMP. However, it is needed to obtain information on the chemicals used in the affected processes since they may be released into the atmosphere.

### **Implementation and Resource Impact**

Existing SCAQMD resources will be used to implement Proposed Amended Rule 1148.2.

### **Attachments**

- A. Summary of Proposal
- B. Key Issues and Responses
- C. Rule Development Process
- D. Key Contacts List
- E. Resolution
- F. Proposed Amended Rule 1148.2 Rule Language
- G. Proposed Amended Rule 1148.2 Final Staff Report
- H. CEQA Notice of Exemption

**ATTACHMENT A**  
**SUMMARY OF PROPOSAL**

Proposed Amended Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers

- Rule 1148.2 was adopted on April 5, 2013 to establish requirements for operators of oil and gas wells to notify the Executive Officer when conducting well drilling, well reworking, and well completion activities. These well activities include: drilling, acidizing, gravel packing, and hydraulic fracturing. The rule also includes requirements for well operators and chemical suppliers to report information on the chemical composition of trade name products used during the well event activity.
- PAR 1148.2 proposes to revise the reporting requirements for chemicals and trade name products used in well drilling, rework and completions in order to make the rule more consistent with SB 4 and DOGGR’s reporting structure. The proposed amended rule will continue to require specific information not specified under SB 4.

Notification Requirements

- PAR 1148.2 increases the public notification period before a well activity begins from 24 hours to 72 hours.
- PAR 1148.2 allows operator to make up to five (5) successive 24-hour extensions.
  - If the operator still needs additional time after the five (5) 24-hour extensions, a new notification meeting the 72-hour timeframe must be submitted.
- Language has been added to allow operators to submit cancelation notifications any time prior to and including the original start date.

Reporting Requirements

- Disaggregate the reporting of the trade name product from the chemical ingredients within the product
- PAR 1148.2 will no longer require the reporting of chemical mass concentration within the trade name product, since the chemical and trade name product are being disassociated, and instead require the mass of each chemical ingredient.
- Make all trade name products and chemical ingredients that are used in both SB 4 and non-SB 4 well activities, available to the public on the SCAQMD’s website, unless they are claimed to be trade secret.
  - When the chemical ingredients are claimed to be trade secret for non-SB 4 well activities, the SCAQMD will post substitute information on the website which includes chemical family name.
- Operators must continue to report the total volume of fluids used and the end date of the well event.

## ATTACHMENT B KEY ISSUES AND RESPONSES

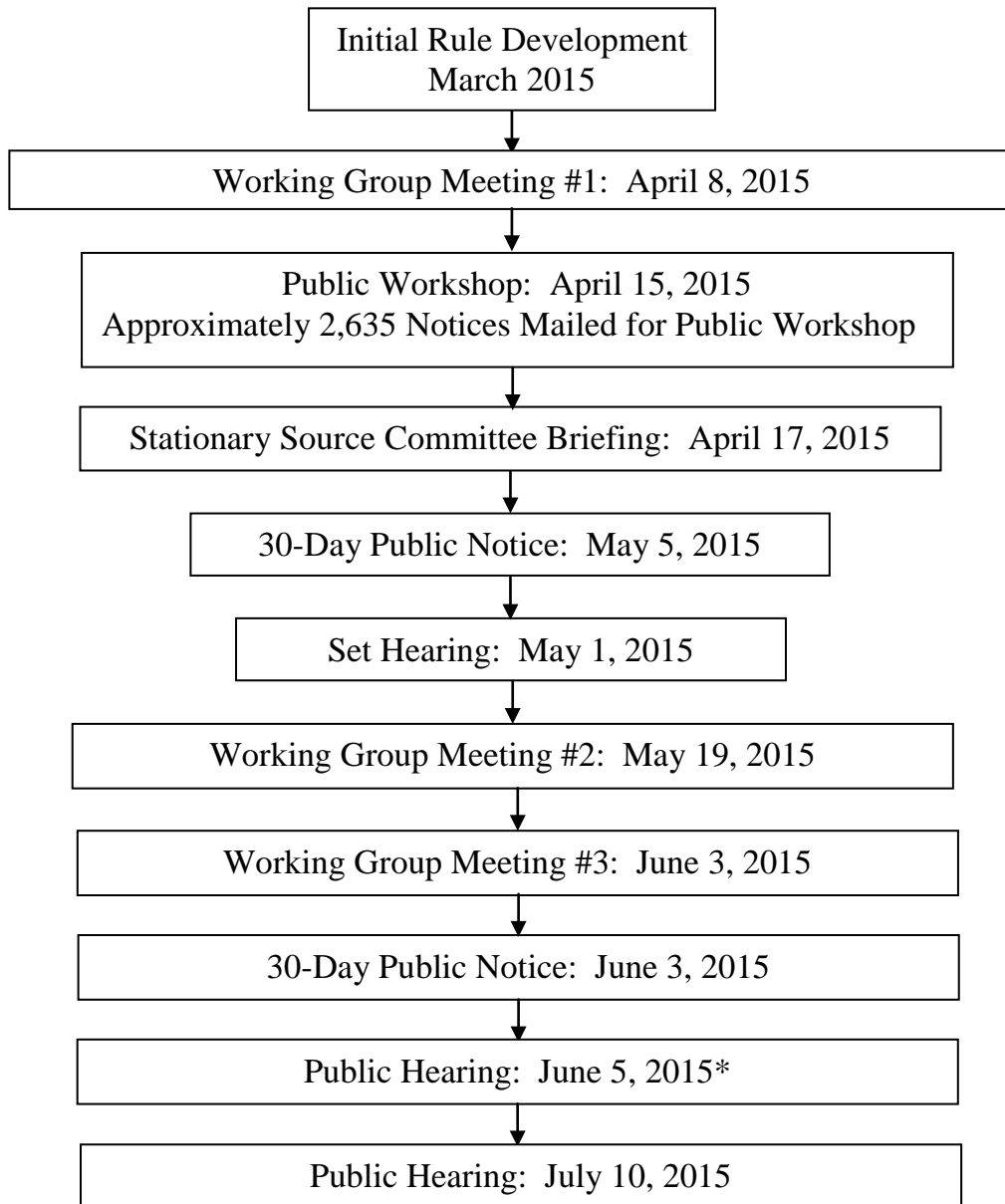
### Proposed Amended Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers

Through the rule development, there were two issues raised: (1) including water injection wells in the proposed amended rule; and (2) the number of 24-hour extensions allowed for well notifications.

- *Water Injection Wells* – Some environmental and community representatives have commented that Rule 1148.2 should include water injection wells at oil production fields since certain well activities, such as acidizing, occur at both water injection wells and oil and gas production wells. When Rule 1148.2 was adopted, water injection wells were not included since SCAQMD staff was informed that there is no flowback from water injection wells, and flowback fluids or fluids that returned to the surface were the primary air quality concern. Community representatives have commented that they are concerned about equipment and chemicals that are being used, and are asking to be notified. SCAQMD staff has explained that additional time is needed to access the potential sources that could be affected if Rule 1148.2 includes water injection wells. The adoption resolution includes a commitment for staff to return to the Stationary Source Committee regarding water injection wells in the first quarter of 2016 and potential amendments to Rule 1148.2 no later than mid-2016.
- *Notification Extensions* – PAR 1148.2 notification provisions allow operators a 24-hour window from the originally projected start date and time to begin the well event, plus five 24-hour extensions, before a new notification must be filed. Operators have commented that five 24-hour extensions is too limiting, because there are last-minute delays due to scheduling equipment, delays in receiving equipment, operational delays at the site, to name a few. Based on approximately 2,400 notices, nearly 60 percent of all notices were rescheduled. For nearly 90 percent of the revisions, the new start date was within three days or less of the original start date. Additionally, approximately 90 percent of the events undergo two revisions or less. Environmental and community groups have commented that operators should be limited to two 24-hour extensions, to provide a shorter window of time for the public to work around. In addition, community representatives have commented that requiring notices at the site, particularly sites where well activities are close to residents, would be beneficial. The SCAQMD staff believes that five 24-hour extensions provide the operator with sufficient flexibility while minimizing potential re-noticing and waiting 72 hours.

**ATTACHMENT C**  
**RULE DEVELOPMENT PROCESS**

**Proposed Amended Rule 1148.2 – Notification and Reporting Requirements  
for Oil and Gas Wells and Chemical Suppliers**



**\*PAR 1148.2 was continued to July 10, 2015.**  
**Five (5) months spent in rule development.**  
**Three Working Group Meetings and one Public Workshop.**

**ATTACHMENT D**  
**KEY CONTACTS LIST**

Baldwin Hills Conservancy  
Baker Hughes Incorporated  
Breitburn Energy Company  
California Independent Oil Producers  
California Resources Corporation  
Citizens Coalition for a Safe Community  
Communities for a Better Environment  
Los Angeles County Department of Environmental Health  
Los Angeles Department of Water and Power  
Linn Operating  
Metropolitan Water District of Southern California  
MTS  
Mr. Richard Parks  
Physicians for Social Responsibility  
Plains Exploration and Production Company  
Save the Montebello Hills Task Force  
Sempra Energy, Southern California Gas Company  
Sierra Club  
Signal Hill Petroleum  
Tidelands Oil Production Company  
Warren E & P  
Western States Petroleum Association



## ATTACHMENT E

RESOLUTION NO. 15-\_\_\_\_\_

**A Resolution of the Governing Board of the South Coast Air Quality Management District (SCAQMD) determining that Proposed Amended Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers, is exempt from the requirements of the California Environmental Quality Act (CEQA).**

**A Resolution of the SCAQMD Governing Board Adopting Proposed Amended Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers.**

**WHEREAS**, the SCAQMD has had its regulatory program certified pursuant to Public Resources Code §21080.5 and has conducted CEQA review and analysis of the proposed amendments to Rule 1148.2 pursuant to such program (SCAQMD Rule 110); and

**WHEREAS**, the SCAQMD Governing Board finds and determines that the proposed amendments to Rule 1148.2 are considered a "project" pursuant to CEQA per CEQA Guidelines §15002 (k) – General Concepts, the three-step process for deciding which document to prepare for a project subject to CEQA; and

**WHEREAS**, the SCAQMD Governing Board finds and determines that after conducting a review of the proposed amendments to Rule 1148.2 in accordance with CEQA Guidelines §15061 – Review for Exemption, procedures for determining if a project is exempt from CEQA, the proposed amendments to Rule 1148.2 are determined to be exempt from CEQA; and

**WHEREAS**, the SCAQMD Governing Board finds and determines that the proposed amendments to Rule 1148.2 are required in order to correctly reference state law and regulations and because the SCAQMD exercises no discretion with regard to the project as proposed, the proposed project is considered to be ministerially exempt from CEQA pursuant to CEQA Guidelines §15268 – Ministerial Projects; and,

**WHEREAS**, the SCAQMD Governing Board finds and determines that it can be seen with certainty that there is no possibility that the proposed project may have any significant effects on the environment, and is therefore, also

exempt pursuant to CEQA Guidelines §15061 - Review for Exemption, paragraph (b)(3) – “general rule” exemption; and

**WHEREAS**, SCAQMD staff has prepared a Notice of Exemption for the proposed project, that is completed in compliance with CEQA Guidelines §15062 – Notice of Exemption; and

**WHEREAS**, the Notice of Exemption, the July 10, 2015 SCAQMD Governing Board letter, and other supporting documentation were presented to the SCAQMD Governing Board and the SCAQMD Governing Board has reviewed and considered the entirety of this information prior to approving the project; and

**WHEREAS**, the SCAQMD staff conducted a public workshop on April 17, 2015 and three Rule 1148.2 Working Group Meetings, (April 8, 2015, May 19, 2015, and June 3, 2015), regarding Proposed Amended Rule 1148.2; and

**WHEREAS**, Health and Safety Code §40727 requires that prior to adopting, amending or repealing a rule or regulation, the SCAQMD Governing Board shall make findings of necessity, authority, clarity, consistency, non-duplication, and reference based on relevant information presented at the public hearing and in the staff report; and

**WHEREAS**, the SCAQMD Governing Board finds that a need exists to adopt Proposed Amended Rule 1148.2 because some of the current trade secret provisions are inconsistent with Senate Bill (SB) 4. The regulations implementing SB 4 were finalized in December 2014, and the final reporting requirements for applicable well stimulation treatment activities took effect on July 1, 2015; and

**WHEREAS**, the SCAQMD Governing Board obtains its authority to adopt, amend or repeal rules and regulations from §§39002, 40000, 40701, 40702, 40725 through 40728, 41508, 41511, and 41700 of the Health and Safety Code; and

**WHEREAS**, the SCAQMD Governing Board has determined that Proposed Amended Rule 1148.2 is written and displayed so that the meaning can be easily understood by persons directly affected by the rule. Proposed Amended Rule 1148.2 has gone through a public process to determine if there is sufficient clarity in the proposed rule language. This public process included re-convening the Rule 1148.2 Working Group established during the original rule adoption process, made of the oil and gas well production industry, environmental organizations, and the public at large. Significant input from the participating

stakeholders ensures that the proposed amended rule is clear and written in a manner that it can easily be understood by the affected industry; and

**WHEREAS**, the SCAQMD Governing Board has determined that Proposed Amended Rule 1148.2 is in harmony with, and not in conflict with, or contradictory to, existing statutes, court decisions, or state or federal regulations. Proposed Amended Rule 1148.2 revises the trade secret provisions and reporting requirements for drilling, well rework and well completion chemicals and trade name products in order to be more consistent with SB 4 and DOGGR's implementing regulations; and

**WHEREAS**, the SCAQMD Governing Board has determined that Proposed Amended Rule 1148.2 will not impose the same requirements as any existing state or federal regulations, and the proposed project is necessary and proper to execute the powers and duties granted to, and imposed upon, the SCAQMD. Some of the pre-production activities applicable under Proposed Amended Rule 1148.2 are also regulated by the California Department of Conservation/Division of Oil, Gas, and Geothermal Resources (DOGGR) and the U.S. EPA. However, Rule 1148.2 was adopted in April 2013, prior to the adoption of SB 4 and DOGGR's regulations. Under the California Code of Regulations, Title 14, Division 2, Chapter 4, subchapter 2, DOGGR requires that operators conducting oil and gas well treatment stimulations submit detailed information about fluids used, and publicly disclose this information on a Division website. Applicable well stimulation treatments under DOGGR's SB 4 regulation include various hydraulic fracturing activities such as "fracking," "acid fracking," as well as "matrix acidizing." Rule 1148.2 is larger in scope than DOGGR's SB 4 regulation in that the rule covers more pre-production activities not covered under DOGGR's regulation such as well drilling, gravel packing, and maintenance acidizing. The proposed amended rule will continue to require the reporting of specific information not required under state law; and

**WHEREAS**, the SCAQMD Governing Board, by adopting Proposed Amended Rule 1148.2, references the following statutes which SCAQMD hereby implements, interprets, or makes specific: Health and Safety Code §§41700, 40460(c), 40913(a)(5), 41511, Federal Clean Air Act Section 112, Sen. Bill No. 4 (2012-2013 Reg. Sess.), codified at Cal. Pub. Res. Code §§ 3213, 3215, 3236.5, 3401, 3150 et seq, and Cal. Code Regs. tit. 14, §§ 1761, 1780 et seq.; and

**WHEREAS**, the proposed amendments to Rule 1148.2 do not significantly affect air quality or emissions limitations. The SCAQMD staff has worked with the Working Group members to streamline chemical reporting requirements to minimize impacts and has also taken steps to structure the reporting process to be nearly identical to the current system to ensure a smooth

transition for operators and suppliers. Increasing the minimal timeframe for notifications from 24 to 72 hours with five 24-hour extensions may require additional re-notifications, however, staff has streamlined the notification portal to populate most information for extensions to minimize costs. Costs associated with the proposed amendments are projected to be minimal. As such, there are no significant costs expected or other socioeconomic impacts anticipated and no socioeconomic analysis is required under Health and Safety Code §40728.5; and

**WHEREAS**, a comparative analysis has been prepared pursuant to Health & Safety Code §40727.2. The proposed amended rule revises the chemical reporting provisions to be more consistent with chemical reporting under the system established by SB 4 and is not expected to result in emission reductions, does not impose a new emission limit or standard, does not make an existing emission limit or standard more stringent. Although PAR 1148.2 does not impose new or more stringent monitoring, reporting, or recordkeeping requirements, the proposed amended rule establishes a more stringent notification provision by increasing the minimum timeframe from 24 to 72 hours that an operator must provide a notification prior to conducting certain well activities. Because the amendments do not result in quantifiable emission reductions, an incremental cost-effectiveness analysis is not applicable; and

**WHEREAS**, the proposed amendments to Rule 1148.2 will not be submitted for inclusion into the State Implementation Plan; and

**WHEREAS**, the SCAQMD Governing Board specifies the Manager of Proposed Amended Rule 1148.2 as the custodian of the documents or other materials which constitute the record of proceedings upon which the adoption of this proposed project is based, which are located at the South Coast Air Quality Management District, 21865 Copley Drive, Diamond Bar, California; and

**WHEREAS**, the Governing Board finds and determines, taking into consideration the factors in §(d)(4)(D) of the Governing Board Procedures, that the modifications adopted which have been made since notice of public hearing was published do not significantly change the meaning of the proposed amended rule within the meaning of Health & Safety Code §40726 ; and

**WHEREAS**, a public hearing has been properly noticed in accordance with all provisions of Health and Safety Code §40725; and

**WHEREAS**, the SCAQMD Governing Board has held a public hearing in accordance with all provisions of law.

**WHEREAS**, the SCAQMD staff has evaluated the information collected since the adoption of Rule 1148.2 and determines that select impacts associated with well drilling, well rework, and well completions should be addressed in a future amendment to Rule 1148.2.

**NOW, THEREFORE, BE IT RESOLVED** that the SCAQMD Governing Board directs staff to revise the Rule 1148.2 Public Portal to add additional search criteria such as Facility ID, location city, and type of well activity (e.g., acidizing, drilling) and make the emission source reports available on the Rule 1148.2 Public Portal within the fourth quarter of 2015; and

**BE IT FURTHER RESOLVED**, that the SCAQMD Governing Board directs staff to monitor chemical reporting and the number of trade secret claims, the number of Rule 1148.2 re-notifications and extensions arising from the change from a 24-hour minimum notification period to a 72-hour minimum notification period and report to the Stationary Source Committee, at the earliest practicable date, if issues arise; and

**BE IT FURTHER RESOLVED**, that the SCAQMD Governing Board directs staff to continue to work with stakeholders regarding alternative community notification approaches and the inclusion of water injection wells and to report to the Stationary Source Committee in the first quarter of 2016 and return to the Governing Board no later than mid-2016 with proposed amendments, if needed; and

**BE IT FURTHER RESOLVED** that the SCAQMD Governing Board directs staff to continue to work with stakeholders to address the findings and select impacts from the evaluation of information collected since the adoption of Rule 1148.2 and to provide an update to the Stationary Source Committee after the July 2016 Board meeting and return to the Governing Board no later than mid-2016 with proposed amendments; and

**BE IT FURTHER RESOLVED** that the SCAQMD Governing Board does hereby determine, pursuant to the authority granted by law, that the proposed amendments to Rule 1148.2 are exempt from CEQA pursuant to CEQA Guidelines §15002 (k)(1) – General Concepts, §15061 (b)(3) – Review for Exemption, and §15268 – Ministerial Projects. This information was presented to the SCAQMD Governing Board, whose members reviewed, considered, and approved the information therein prior to acting on the proposed amendments to Rule 1148.2; and

**BE IT FURTHER RESOLVED**, that the SCAQMD Governing Board does hereby adopt, pursuant to the authority granted by law, Proposed Amended Rule 1148.2, as set forth in Attachment F.

DATE: \_\_\_\_\_

\_\_\_\_\_  
CLERK OF THE BOARDS

## ATTACHMENT F

(Adopted April 5, 2013)  
PAR 1148.2e  
June, 2015

### **RULE 1148.2 NOTIFICATION AND REPORTING REQUIREMENTS FOR OIL AND GAS WELLS AND CHEMICAL SUPPLIERS**

(a) Purpose

The purpose of this rule is to gather air quality-related information on oil and gas well drilling, well completion, and well reworks.

(b) Applicability

This rule applies to any operator of an onshore oil or gas well located in the District that is conducting oil or gas well drilling, well completion, or well reworks. In addition, this rule applies to suppliers as defined in paragraph (c)(14).

(c) Definitions

For the purposes of this rule, the following definitions shall apply:

- (1) **ACIDIZING** means a treatment of the wellbore or reservoir formation with an acid to either clean out scale, damage, or other debris in the well, or react with the soluble substances in the formation to improve permeability and enhance production of oil and gas.
- (2) **AIR TOXIC** means any substance identified on a list that is compiled and maintained by the California Air Resources Board pursuant to Health and Safety Code Section 44321.
- (3) **CHEMICAL FAMILY** means a group of chemicals with related physical and chemical properties.
- (4) **DRILLING** means digging or boring into the earth for the purpose of developing, extracting, or producing oil, gas, or other hydrocarbons, but does not include remediation efforts to clean-up or remove contamination.
- (5) **DRILLING FLUID** means fluid used to lubricate the drill string, line the walls of a well, flush cuttings to the surface, and create enough hydrostatic weight to prevent blowouts.
- (6) **FLOWBACK FLUID** means the fluid that flows from an oil or gas well following a well production stimulation or treatment activity, either in preparation for a subsequent phase of well production stimulation or

- treatment activity, or in preparation for a cleanup and returning the well to production. The flowback period begins when material introduced into the well during the well production stimulation or treatment activity returns to the surface immediately following the activity. The flowback period ends with either well shut in or when the well is producing continuously to the flow line or to a storage vessel for collection, whichever occurs first.
- (7) **GRAVEL PACKING** means a method that uses water and additives to place sand and gravel near the wellbore itself with the objective of limiting entry of formation sands and fine-grained material into the wellbore.
  - (8) **HYDRAULIC FRACTURING** means a technique used in stimulating a formation or zone that involves the pressurized injection of hydraulic fracturing fluid, which is a carrier fluid mixed with chemical additives, and typically a proppant, into an underground geologic formation in order to fracture the formation, thereby causing or enhancing the production of oil or gas from a well.
  - (9) **ONSHORE OIL OR GAS WELL** means a well located on lands that are not submerged under ocean waters or inland bays during mean high tide.
  - (10) **OPERATOR** means a person who actually drills a well or operates a well or production facility or a person who by virtue of ownership, or under the authority of a lease or any other agreement, has the right to drill, operate, maintain, or control a well or production facility.
  - (11) **PROPPANT** means material inserted or injected into the underground geologic formation that is intended to prevent fractures from closing.
  - (12) **REWORK** means any operation subsequent to drilling that involves deepening, redrilling, or well production stimulation or treatment activity of an existing well.
  - (13) **SENSITIVE RECEPTOR** means any residence including private homes, condominiums, apartments, and living quarters; education resources such as preschools and kindergarten through grade twelve (k-12) schools; daycare centers; and health care facilities such as hospitals or retirement and nursing homes. A sensitive receptor includes long term care hospitals, hospices, prisons, and dormitories or similar live-in housing.
  - (14) **SUPPLIER** means an entity selling or distributing a chemical to the operator of an onshore oil or gas well for use as a drilling fluid, well completion fluid, or rework.
  - (15) **TRADE SECRET** may include, but is not limited to, any formula, plan,



pattern, process, tool, mechanism, compound, procedure, production data, or compilation of information which is not patented, which is known only to certain individuals within a commercial concern who are using it to fabricate, produce, or compound an article of trade or a service having commercial value and which gives its user an opportunity to obtain a business advantage over competitors who do not know or use it, as defined in California Government Code Section 6254.7(d).

- (16) WELL means an oil or gas well, a hole drilled for the purpose of producing oil or gas, or a well into which fluids are injected.
- (17) WELL COMPLETION means the activities and methods, including well production stimulation or treatment activities, of preparing a well for the production of oil or gas, by which one or more flow paths for hydrocarbons are established between the reservoir and the surface.
- (18) WELL COMPLETION FLUID means a carrier fluid mixed with physical and chemical additives used for the purpose of preparing a well for the production of oil or gas, or used in a well production stimulation or treatment activity.
- (19) WELL PRODUCTION STIMULATION OR TREATMENT ACTIVITY means acidizing, gravel packing, hydraulic fracturing, or any combination thereof.
- (20) WELL REWORK FLUID means a carrier fluid mixed with chemical and/or physical additives used in any operation subsequent to drilling that involves a well production stimulation or treatment activity of an existing well.

(d) Notification Requirements

- (1) ~~Beginning June 4, 2013, the~~ The operator of an onshore oil or gas well shall electronically notify the Executive Officer, using a format approved by the Executive Officer, of the following information, no more than ten (10) calendar days and no less than ~~24~~ 72 hours prior to the start of drilling, well completion, or rework of an onshore oil or gas well:
  - (A) name and contact information of the owner and operator of the subject well(s);
  - (B) well name(s) and API well number(s) (if available);
  - (C) geographical coordinates of the subject well(s);
  - (D) nearest sensitive receptor within 1,500 feet of the subject well(s), specifying the:

- (i) sensitive receptor type (e.g., residence, school, hospital);
  - (ii) name of facility, if applicable;
  - (iii) location address; and
  - (iv) distance from the closest property line of the sensitive receptor to the subject well(s); and
- (E) ~~expected~~ originally projected start date(s) and time(s), and identification of general activities to be conducted (e.g., drilling, well completion, and reworking). An operator has a 24-hour window from the originally projected start time to begin conducting the drilling, well completion, and/or rework activity.
- (2) If the start date for the drilling, well completion, or rework ~~as notified by the operator of an onshore~~ of an onshore oil or gas well notification submitted to the Executive Officer pursuant to subparagraph (d)(1)(E) is anticipated to occur before the originally projected noticed start date and time, the operator shall electronically notify the Executive Officer at least 72 hours prior to the new start date and time.:
- (A) ~~at least 24 hours prior to the new start date if rescheduled to occur earlier than the original start date; or~~
  - (B) ~~within 24 hours prior to or before the original start date if canceled; or rescheduled to occur after the original start date.~~
- (3) If the start date and time for the drilling, well completion, or well rework of an onshore oil or gas well specified in a notification submitted to the Executive Officer pursuant to subparagraph (d)(1)(E) is anticipated to occur after the originally projected 24-hour window of the start date and time, the operator shall electronically notify the Executive Officer of an extension provided that:
- (A) the extension does not exceed a 24-hour time period;
  - (B) the operator electronically notifies the Executive Officer of the extension within the 24-hour window following the originally projected, or most recently noticed start date and time; and
  - (C) no more than five successive 24-hour extensions are requested.
- (4) If the drilling, well completion, or well rework of an onshore oil or gas well submitted to the Executive Officer pursuant to subparagraph (d)(1)(E) will not occur, the operator shall electronically notify the Executive Officer of a cancelation no later than the end of the 24-hour window of the most recently noticed start date and time.

- (5) If the new start date and time for drilling, well completion, or well rework activity submitted to the Executive Officer is expected to occur beyond the end of extension periods provided for in paragraph (d)(3), the operator shall electronically notify the Executive Officer of a cancellation pursuant to paragraph (d)(4). Submission of a new start date and time must then comply with the provisions of paragraph (d)(1).
- ~~(3)~~(6) The notification time period in paragraph (d)(1) shall not apply to drilling, well completion, or rework operations that are necessary to avert a threat to life, health, property, or natural resources. The notification shall be submitted no later than 48 hours after the start of the operations specified in this paragraph.
- ~~(4)~~(7) Within 24 hours of receipt, the Executive Officer shall make all information as received under paragraphs (d)(1) through (d)(3) available to the public on a website.
- ~~(5)~~ Operators submitting notifications subject to paragraph (d)(2), shall also meet the submission timeframes specified in paragraph (d)(1).
- (e) Reporting Requirements
- (1) Beginning June 4, 2013 and until April 5, 2015, for each well, the operator of an onshore oil and gas well shall electronically submit a report to the Executive Officer, using a format approved by the Executive Officer, no later than sixty (60) calendar days after the completion of the last activity associated with drilling, well completion or rework, specifying the following information:
- (A) name and contact information of the owner and operator of the subject well;
  - (B) well name(s) and API well number(s) (if available);
  - (C) identification of combustion equipment rated at greater than 50 brake horsepower that is used during the drilling, well completion, or reworks including the equipment type, engine size, fuel type, engine tier, and hours of operation;
  - (D) for dry materials used for drilling, well completion, and rework provide:
    - (i) type and amount of dry materials used;
    - (ii) method(s) in which dry materials are added and mixed onsite into the drilling and well completion fluid(s); and

- (iii) any air pollution control techniques, devices, and/or practices used to control fugitive emissions or odors;
- (E) for drilling fluids, well completion fluids, and flowback fluid, provide:
  - (i) volume of well completion fluids used and volume of flowback fluid recovered;
  - (ii) method(s) used for collecting, storing, conditioning, separating, and/or treating drilling fluids and/or flowback fluids as they return to the surface;
  - (iii) any air pollution techniques, devices, and/or practices used to control volatile organic compounds or odors; and
  - (iv) final disposition of recovered drilling fluids and flowback fluids.
- (2) ~~Beginning June 4, 2013, a~~Except as provided in (e)(3), a supplier that provides chemicals to the operator of an oil or gas well for drilling, well completion, or rework shall provide the operator with the information in subparagraphs (e)(2)(A) through (e)(2)(~~EDC~~). ~~If a supplier claims trade secret protection for a chemical ingredient, the supplier shall notify the operator and provide the operator only with the substitute information, as described in subparagraph (e)(2)(F).~~The information in this subparagraph shall be submitted within ten (10) calendar days after the chemicals are delivered to the operator.
  - (A) ~~total volume of each well drilling fluid, well rework fluid and well completion fluids used~~ name and chemical abstract service (CAS) number of each chemical ingredient;
  - (~~B~~)(A) ~~for each trade name product used in a well drilling fluid, well rework fluid, or well completion fluid provide the purpose of the chemical ingredient;~~
    - (i) identity;
    - (ii) purpose; and
    - (iii) total mass in pounds (lbs)
  - (~~C~~)(B) ~~for each chemical ingredient used or contained in a trade name product identified in subparagraph (e)(2)(A)(B), without being required to associate any chemical ingredient with any specific trade name product, provide the~~ for each chemical trade name product:

- (i) ~~identity the total volume and density; or;~~
  - (ii) ~~CAS number total mass;~~
  - (iii) ~~the maximum concentration in percent by mass of each chemical ingredient. If the actual mass of each chemical ingredient is not available, the supplier may report the mass using the maximum concentration in percent by mass to calculate the mass of the chemical ingredient within the total well drilling fluid, well rework fluid, and well completion fluid; and~~
  - (iv) ~~identification of whether each chemical ingredient used or contained in the trade name product identified in subparagraph (e)(2)(A)(B) is an air toxic.~~
- ~~(D)(C)~~ name, address, and contact name of the supplier for each chemical identified in subparagraph (e)(2)(B)(C) for each chemical ingredient used in the chemical trade name product, the maximum concentration in percent by mass;
- ~~(E)~~ identification of whether the chemical ingredient is an air toxic
- ~~(F)~~ for chemical information claimed protected as trade secret, the following information shall be provided to the operator for each chemical ingredient the supplier claims trade secret protection:
- ~~(i)~~ statement that the supplier claims trade secret protection;
  - ~~(ii)~~ basis for the claim of trade secret protection; and
  - ~~(iii)~~ chemical family or similar descriptor for the chemical ingredient that is claimed protected trade secret; and
  - ~~(iv)~~ identification of whether a chemical ingredient within the chemical family or similar descriptor is an air toxic.
- (3) If the supplier claims trade secret protection for any information specified in paragraph (e)(2), the provisions of subparagraphs (e)(3)(A) and (B) apply to that information claimed to be trade secret pursuant to paragraph (e)(2). For well stimulation treatments as defined in §Sections 3153 and 3157 of Chapter 1 of Division 3 of the California Public Resources Code, and §Section 1761 of Title 14, Division 2, Chapter 4, Subchapter 2 of the Department of Conservation, Division of Oil, Gas, and Geothermal Resources' (DOGGR) SB4 Well Simulation Treatment Regulations, the identities of chemical ingredients, including CAS identification numbers, are not protected as trade secret, then within sixty (60) days after the chemicals

are delivered to the operator, the supplier shall electronically report, using a format approved by the Executive Officer, the following information to the Executive Officer:

- (A) Within ten (10) calendar days after the chemicals are delivered to the operator, the supplier shall notify and provide the operator with the following information-.name and the API number of the affected well(s) associated with the well drilling, well completion, or rework activity;:
- (i) statement that the supplier claims trade secret protection;
  - (ii) basis for the claim of trade secret protection; and
  - (iii) chemical family or similar descriptor if the chemical ingredient is claimed as protected trade secret; and-
  - (iv) identification of whether a chemical ingredient is an air toxic if the chemical ingredient is claimed as protected trade secret.
- (B) Within sixty (60) calendar days after chemicals are delivered to the operator, the supplier shall electronically submit a report to the Executive Officer using a format approved by the Executive Officer, the following information:- for chemical ingredients claimed as protected trade secret, information required in subparagraphs (e)(2)(A) through (e)(2)(F); and
- (i) name and the API number of the affected well(s) associated with the well drilling, well completion, or rework activity;
  - (ii) if the mass of a trade name product is claimed as a trade secret, the information in subparagraph (e)(2)(A)(B);
  - (iii) if a chemical ingredient, mass of a chemical ingredient, or CAS number is claimed as trade secret, the information specified in subparagraph (e)(2)(B)(C);
  - (iv) company name, address, contact, and phone number of the operator that used the chemicals; and
  - (v) well activity type
- ~~(C) company name, address, contact, and phone number of the operator that used the chemicals.; and~~
- (4) ~~Beginning June 4, 2013, t~~The operator of an onshore oil and gas well shall electronically report, using a format approved by the Executive Officer, any

trade name product or chemical ingredient ~~chemical ingredients~~ contained in the drilling fluid, well rework fluid, and well completion fluids to the Executive Officer no later than sixty (60) calendar days after the last activity, or if more than one operation is being conducted, the last activity in the series of operations associated with drilling, well completion, or rework, specifying the following information:

- (A) name and API number of the affected well(s) associated with the well drilling, well completion, or rework activity;
  - (B) ~~for chemical ingredients not claimed as protected trade secret,~~ the information required in subparagraphs (e)(2)(A) through (e)(2)(CDE) unless it has been claimed as protected trade secret;
  - (C) for any information specified in paragraph (e)(2) ~~chemical ingredients~~ claimed as protected trade secret, the information specified required in subparagraph (e)(3)(A)subparagraph (e)(2)(F); and
  - (D) company name, address, contact, and phone number of the suppliers of any trade name product or chemical ingredients used or contained in that product;
  - (E) well activity type; and
  - (F) the start and end dates of the well activity, and
  - (G) the total volume of each well drilling fluid, well rework fluid, and well completion fluid used.
- (5) Claims and any public requests to inspect records submitted under paragraph (e)(3) shall be subject to the California Public Records Act and the SCAQMD's Guidelines for Implementing the California Public Records Act, adopted on May 6, 2005, and any subsequent revisions, thereto.
- (6) For reports required pursuant to paragraphs (e)(1)(3) and (e)(4), if the time between each individual activity within a series exceeds fourteen (14) calendar days, then a separate report shall be submitted to the Executive Officer for each activity that occurred outside of the 14-day period.

(f) SCAQMD Website Posting of Chemicals

~~Beginning June 4, 2013,~~ ~~†~~ The Executive Officer shall make the following information as received under subdivision (e) available to the public for each event by operator name, well name, API well number, location, and date of activity on a

website:

- (1) For all submitted information where no non-trade secret chemical ingredients claim has been made:
- (A) Total volume of drilling, well rework or completion fluids used  
Name of the chemical ingredient;
  - (B) For each trade name product used in the well drilling fluid, well rework fluid, or well completion fluid—chemical abstract service (CAS) number:
    - (i) identity;
    - (ii) purpose; and
    - (iii) total mass in pounds (lbs)
  - (C) For each chemical ingredient used or contained in each trade name product, without associating any chemical ingredient with any specific trade name product: Purpose of the chemical ingredient:
    - (i) identity;
    - (ii) CAS number;
    - (iii) the maximum concentration in percent by mass of each chemical ingredient within the total well drilling fluid, well rework fluid, and well completion fluid; and
    - (iv) identification of whether each chemical ingredient used or contained in the trade name product is an air toxic.
- (2) For all the submitted information where specified in paragraphs (f)(1), unless claimed as a trade secret claim has been made:—If the chemical ingredient and/or CAS number have been claimed to be trade secret, the chemical family name or similar descriptor and identification of whether chemical ingredient as an air toxic shall be posted. For all trade secret chemical ingredients:
- (A) the chemical family name or similar descriptor, if the chemical ingredient and/or CAS number have been claimed to be trade secret; and
  - (B) identification of whether chemical ingredient is an air toxic
  - (A) Chemical family name or similar descriptor; and
  - (B) Identification of chemicals that are an air toxic.



**ATTACHMENT G**

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

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**~~Draft~~Final Staff Report  
Proposed Amended Rule 1148.2 – Notification and Reporting  
Requirements for Oil and Gas Wells and Chemical Suppliers**

**~~May~~July 2015**

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## EXECUTIVE SUMMARY

The South Coast Air Quality Management District (SCAQMD) staff is proposing to modify the chemical reporting requirements in Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers so they will be more consistent with state law. The California Department of Conservation, through its Division of Oil, Gas, and Geothermal Resources (DOGGR), has adopted well stimulation treatment regulations<sup>1</sup> in response to the passage of Senate Bill (SB) 4 (2012-2013 Reg. Sess.) (approved by the Governor on September 20, 2013). The regulations were finalized in December 2014 and become effective on July 1, 2015. However, DOGGR has implemented similar interim regulations that are in currently in effect. Proposed Amended Rule (PAR) 1148.2 will: 1) disaggregate the reporting of the trade name product from the chemical ingredients within the product; 2) no longer require the reporting of chemical mass maximum concentration within the trade name product, and instead require the maximum concentration in percent by mass of each chemical ingredient within the total well drilling, well rework, and well completion fluid to be reported; and, 3) make all of the well stimulation information deemed not to be trade secret under SB 4 available to the public on the SCAQMD's website. In addition, PAR 1148.2 will revise the notification timeframe and require operators to notify the Executive Officer a minimum of, 72 hours instead of 24 hours, before starting a Rule 1148.2 activity. In addition, PAR 1148.2 will allow operators to extend the start time of the well activity in 24-hour increments. PAR 1148.2 limits the number of 24-hour extensions to five. Additional minor changes to rule language have been made for consistency and clarity. The proposed amended rule will continue to require the reporting of specific information not required under SB 4 and DOGGR's reporting structure.

## INTRODUCTION

Rule 1148.2 was adopted on April 5, 2013 to establish requirements for owners or operators of oil and gas wells to notify the Executive Officer when operations involving well drilling, well reworks and well completions such as hydraulic fracturing, acidizing, and gravel packing. Rule 1148.2 also requires suppliers of chemicals that are used in the aforementioned well activities to provide information on chemical use. Following the adoption of Rule 1148.2, SB 4 was signed into law and DOGGR developed SB4 Well Simulation Treatment Regulations that include chemical reporting requirements for some well stimulation techniques that are also covered by Rule 1148.2. The Proposed Amended Rule 1148.2 outlined below is to introduce revisions to the chemical reporting requirements in order to be more consistent with SB 4 and DOGGR's regulations implementing SB 4.

### Rule 1148.2 Updates

Separate from this rulemaking, but related to Rule 1148.2, SCAQMD staff has been providing updates on the implementation of Rule 1148.2 to the Working Group and Stationary Source Committee. During the adoption of Rule 1148.2 on April 5, 2013, the SCAQMD committed to report back to the Stationary Source Committee within 2 years of rule adoption, findings and recommendations for the need, if any, for emission controls or regulatory efforts for well drilling, well completion, and well reworks. During the last two years staff has conducted site inspections, sampling, monitoring, and data evaluation of well events applicable under Rule

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<sup>1</sup> The Department of Conservation added sections, 1761, 1780, 1781, 1782, 1783, 1783.1, 1783.2, 1783.3, 1784, 1784.1, 1785, 1786, 1787, 1788, and 1789 to Title 14, Division 2, Chapter 4, Subchapter 2 of The California Code of Regulations.

1148.2. The findings from this evaluation include (1) elevated levels of benzene, toluene, ethylbenzene, xylene, and Non-Methane Organic Compounds (NMOC) openings at catch basins and temporary storage tanks; (2) diesel PM emissions from on-site engine usage; and (3); best management practices (BMPs) to reduce potential impacts from spillages or leakages. BMPs which potentially reduce impacts from these findings include: (1) use of carbon canisters for Adler Tanks and keeping hatches closed or covered from all tanks to reduce NMOC emissions; (2) use of plastic totes or similar intermediate bulk containers for adding dry materials thereby reducing opportunity for spillage; (3) use of plastic sheet ground covers to capture liquid leaks and spills of fluids and dry materials; and (4) use of low emission on-site diesel engines. In addition, SCAQMD staff will be proposing to amend Rule 1148.2 no later than mid-2016 to address these findings. Staff will also report to the Stationary Source Committee after the July Board meeting.

## **BACKGROUND**

Rule 1148.2 was adopted on April 5, 2013 and established requirements for owners or operators of oil and gas wells to notify the Executive Officer when conducting well drilling, well reworking, or well completion activities. In addition to production drilling, the rule is applicable to hydraulic fracturing, maintenance and matrix acidizing, acid fracturing and gravel packing activities. The rule also includes requirements for well operators and chemical suppliers to report information on the chemical composition of trade name products used during the well event activity. Under the current rule, chemical suppliers have to provide well operators with the identities of the trade name products, the amount of each trade name product and purpose for each chemical ingredient used in well drilling, well completion, and well stimulation fluids; as well as chemical identities, Chemical Abstract Service (CAS) numbers, and maximum concentration ~~for~~ in percent by mass of each chemical ingredient used in the total fluid trade name product. The current rule allows chemical suppliers to claim trade secret protection for chemical ingredients within the trade name product. For any trade secret claim, suppliers must provide operators with substitute information -- the chemical family name for each chemical ingredient for which a trade secret claim is asserted. Independent of trade secret claims, suppliers shall also inform operators whether each chemical ingredient is an air toxic.

On September 20, 2013, Governor Brown signed SB 4 – a bill establishing a structure for regulating advanced well stimulation treatments – which are treatments of a well designed to enhance oil and gas production or recovery by increasing the permeability of the formation such as hydraulic fracturing and certain forms of acidizing. Among other things, SB 4 requires an operator to apply for a permit prior to performing a well stimulation treatment and to publically post specified information regarding the well stimulation fluid. As required by SB 4, DOGGR developed interim regulations that went into effect in California on January 1, 2014. The final DOGGR regulations were approved in December 2014, and will go into effect on July 1, 2015.

Under DOGGR's SB 4 regulations, operators and suppliers shall report identities and concentrations of chemicals used in well stimulation treatments. Under DOGGR's regulation, well stimulation treatments include hydraulic fracturing, acid fracturing, and acid matrix

stimulation treatment<sup>2</sup>. While setting forth chemical reporting requirements, SB 4 also sets limits on information that can be claimed trade secret with respect to well stimulation treatment fluids. The law states that none of the following are protected as trade secret: (1) identities and CAS numbers of chemical ingredients of additives used in well stimulation treatments (2) concentrations of additives within well stimulation treatment fluids (3) any air or other pollution monitoring data (4) health and safety data associated with well stimulation treatment fluids and (5) the chemical composition of the flowback fluid. Table 1 compares the reporting requirements in SCAQMD Rule 1148.2 and DOGGR’s SB 4 regulations.

As shown in Table 1 and discussed below, the differences between the two reporting structures are:

#### Well Activities Covered by Reporting Requirements

SCAQMD Rule 1148.2 covers drilling, gravel packing, hydraulic fracturing, acid fracturing, and maintenance and matrix acidizing, while SB 4 regulations focus on hydraulic fracturing, acid fracturing and matrix acidizing.

#### Trade Secret Protection

As adopted, SCAQMD Rule 1148.2 allows suppliers to claim trade secret protection for chemical identities and CAS numbers of chemicals contained in well stimulation treatment additives, while SB 4 disallows these claims for the well stimulation activities covered under SB 4.

**Table 1**  
**Comparison between SCAQMD Rule 1148.2 and DOGGR’s SB 4 Regulations Reporting Requirements.**

Topic	Rule 1148.2	SB4/DOGGR
Well Events Where Chemical Reporting is Required	<ul style="list-style-type: none"> <li>• Hydraulic Fracturing</li> <li>• Acid Fracturing</li> <li>• Acid Matrix Stimulation Treatment</li> <li>• Maintenance Acidizing</li> <li>• Gravel Packing</li> <li>• Drilling</li> </ul>	<ul style="list-style-type: none"> <li>• Same</li> <li>• Same</li> <li>• Similar<sup>3</sup>(above acid volume threshold)</li> <li>• No requirement</li> <li>• No requirement</li> <li>• No requirement</li> </ul>
Well Stimulation Fluid Reporting	<ul style="list-style-type: none"> <li>• List of chemicals</li> <li>• Reported after well event activity</li> </ul>	<ul style="list-style-type: none"> <li>• Same</li> <li>• Reported prior to and after well event activity</li> </ul>

<sup>2</sup> Under DOGGR’s SB 4 regulation, acidizing must exceed a specified “acid volume threshold” to be applicable under the regulation. This is a metric that characterizes the total volume of acid used for a given well bore dimension.

<sup>3</sup> Under DOGGR’s SB 4 regulations, any type of acidizing must exceed the “acid volume threshold” to be applicable under the regulation. This is a metric that characterizes the total volume of acid used for a given well bore dimension

Topic	Rule 1148.2	SB4/DOGGR
Reporting Chemical Ingredient within Trade Name Product	<ul style="list-style-type: none"> <li>Report the Trade Name Product</li> <li>Report the chemical ingredients within a Trade Name Product</li> </ul>	<ul style="list-style-type: none"> <li>Report the Trade Name Product</li> <li>Report the chemical ingredients with no correlation to Trade Name Product</li> </ul>
Reporting Requirements for Well Stimulation Chemical Ingredients <sup>4</sup>	<ul style="list-style-type: none"> <li>Chemical ingredient names</li> <li>CAS#</li> <li>Maximum mass concentrations of chemical ingredient <u>within trade name product</u></li> <li>Mass or volume and density of trade name product</li> <li>Identify if chemical is an air toxic</li> <li>Purpose of chemical ingredient</li> </ul>	<ul style="list-style-type: none"> <li>Same</li> <li>Same</li> <li>Maximum mass concentration of chemical ingredient <u>within total well stimulation fluid</u></li> <li>Mass concentration of trade name product within total fluid</li> <li>No requirement</li> <li>Purpose of Trade Name Product</li> </ul>
Is Trade Secret allowed?	<ul style="list-style-type: none"> <li>Yes, except for chemical family name and whether chemical is an air toxic</li> </ul>	<ul style="list-style-type: none"> <li>Yes, except for chemical identities, including CAS#, mass concentration of additives within fluid, any air or other pollution monitoring data, health and safety data, and flowback fluid composition</li> </ul>

Rather than stating what can be protected as trade secret, SB 4 states what information cannot be protected as trade secret. Thus, state law does not explicitly prohibit an operator or chemical supplier from claiming trade secret protection for the chemical ingredient mass concentration within the trade name additive. However, Rule 1148.2 does require that the total mass of the trade name product and maximum percent concentration by mass of each chemical ingredient within each trade name product be reported.

Therefore, in order to align Rule 1148.2 with state law, SCAQMD staff is proposing changes to chemical reporting requirements in Rule 1148.2. The SCAQMD staff is proposing that Rule 1148.2 reporting requirements be restructured in order to disallow trade secret claims for the information specified in SB 4 as not protectable for those well stimulation treatments defined under the DOGGR's SB 4 Well Simulation Treatment Regulations (Title 14, Division 2, Chapter 4, Subchapter 2, Article 2, section 1761).

## PROPOSED AMENDMENTS TO RULE 1148.2

Proposed Amended Rule 1148.2 proposes to revise the reporting requirements for drilling, well rework, and well completion chemicals and trade name products in order to make the rule more consistent with SB 4 and DOGGR's reporting structure, while still requiring the reporting of additional chemical information not covered by SB 4. PAR 1148.2 will: 1) disaggregate the reporting of the trade name product from the chemical ingredients within the product; 2) no

<sup>4</sup> Only a partial list of what is required to be reported under SB 4 and DOGGR's regulation is shown.

longer require the reporting of the chemical mass concentration within the trade name product, and instead require the ~~maximum concentration of the chemical ingredient in percent by mass of each chemical ingredient within the total well drilling, well rework, or well completion fluid to be reported;~~ and 3) make all the SB 4 related well stimulation information deemed not to be trade secret under SB 4 provisions, available to the public on the SCAQMD's website. PAR 1148.2 also includes revisions to the notification requirements. Additional minor changes to rule language also will be made for consistency and clarity,~~as well as retaining one provision from the current rule that sunset in April 2015, which requires the total volume of well treatment fluids to be reported.~~

### **Disaggregate the reporting of the trade name product from the chemical ingredients within the product**

Under the current version of Rule 1148.2, a supplier providing trade name product and chemicals to an operator shall provide information on each trade name product. The information provided shall contain the identity of the trade name product and its total mass. Additionally, under paragraph (e)(2)(B)-(D) of the current version of Rule 1148.2, for all trade name products<sup>5</sup> a supplier shall also provide the chemical ingredients' identity, chemical abstract service number, the maximum concentration by mass of each chemical within the trade name product, the purpose of the chemical ingredient, and whether the chemical ingredient is an air toxic. Under the current Rule 1148.2 reporting structure, each trade name product and its chemical ingredients are linked together.

SB 4 Regulations (Title 14, Division 2, Chapter 4, Subchapter 2, Article 4, section 1788) require the disclosure of the trade name and purpose for all trade name products used in well stimulation as well as the chemical identities, CAS numbers and maximum concentrations of each chemical within the well stimulation fluids. Under the DOGGR's SB 4 regulations reporting structure, trade names of additives and their chemical ingredients are reported and publically listed separately. This structure prevents matching chemical ingredients of trade name products with the actual trade name of the additive, therefore limiting the ability to determine their exact formulation. Based on SCAQMD's discussions with industry representatives, disaggregation of the chemical ingredients from the trade name products or additives, potentially reduces the need for suppliers to claim trade secret protection for their products for both SB 4 related activities and those activities not applicable under SB 4, such as maintenance acidizing and gravel packing. Further discussion with DOGGR's staff indicated that to date DOGGR has not received any trade secret claims for the chemical information submitted under the SB 4 interim regulations.

The current version of Rule 1148.2 (e)(3), allows the suppliers of chemicals to claim trade secret protection for exact chemical identities, CAS numbers and concentrations of chemicals within each trade name product. The SCAQMD staff believes that some portion of trade secret claims is invoked due to the fact that Rule 1148.2 links trade name products to their chemical ingredients. Therefore, suppliers elect to claim trade secret protection in order to protect the exact formulation of their additives. By disaggregating trade names from chemical ingredients,

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<sup>5</sup> SB 4 and DOGGR's interim and final regulation use the term "Well Stimulation Treatment Additive" while Rule 1148.2 uses the term "Trade Name Product". For purposes of Rule 1148.2, they are synonymous. For consistency purposes, PAR 1148.2 and this staff report uses "Trade Name Product".



the SB 4 reporting scheme provides for the complete disclosure of the identity of chemical ingredients while protecting the exact formulation of each trade name product and therefore eliminating trade secret claims for SB 4 related activities and greatly reducing trade secret claims for non-SB 4 related activities.

Therefore, in order to maintain the highest level of public disclosure, SCAQMD staff is modifying the structure of chemical reporting for Rule 1148.2 in a way that disaggregates the products' trade names and their chemical ingredients. Specifically, the PAR 1148.2 Reporting Portal forms will be modified to introduce separate sections for the reporting of trade name products and chemical ingredients. Under this modified reporting structure, for each well activity type, all trade name products, their purpose and their supplier names will be reported in a separate section from the chemical ingredient information, which includes: the chemical name, CAS number, the ~~maximum concentration in percent by mass of each chemical ingredient within the total well drilling, well rework, and well completion fluid~~ to be reported, and air toxic identifier.

**Replace requirement for the reporting of chemical concentration within the trade name product with requirement for reporting the maximum concentration of the chemical in percent by mass within the total well drilling, well rework, and well completion fluid. Require the reporting of chemical mass instead of concentration within the trade name product**

The chemical reporting requirements in the current version of Rule 1148.2 (e)(2)(D) require the supplier to provide to the operator the maximum concentration of each chemical ingredient (in percent, by mass) for each chemical ingredient within the trade name product. DOGGR's SB 4 Regulations (Title 14, Division 2, Chapter 4, Subchapter 2, Article 4, section 1783.1) require the disclosure of the maximum chemical concentration (in percent, by mass) within the total well stimulation fluids for each chemical constituent.

Proposed Amended Rule 1148.2 proposes to disaggregate reporting of trade name products and their chemical ingredients, deeming the reporting of the concentration of a chemical ingredient within a trade name product unnecessary. Therefore, SCAQMD staff is proposing to replace the requirement for the reporting of maximum concentration in percent by mass of the chemical ingredient within the trade name product with the requirement to report the ~~maximum concentration in percent by mass of each chemical ingredient supplied to the operator~~ within the total well drilling, well rework, and well completion fluid. Where the actual total mass of each chemical ingredient is not available, the supplier may report the total mass using the maximum concentration in percent by mass to calculate the total mass of the chemical ingredient.

Additionally, based on a review of all the chemical data submitted since the adoption of the rule, SCAQMD staff has determined that in 99% of cases, operators and suppliers submit the mass of trade name product rather than providing the volume and density<sup>6</sup>. Therefore, requiring an operator to report the mass rather than providing the option of reporting the mass or the volume and density will streamline the reporting process. In addition, environmental and community group representatives recommended that reporting the mass is more informative than the volume and density. The preceding changes in reporting requirements will still maintain the disclosure

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<sup>6</sup> The total mass of the trade name product may be calculated using the product of the volume and density.

of the amounts of chemicals and additives used in well activities without eliminating any vital information.

### **Make chemical identity information that SB 4 deems cannot be protected as trade secret available to the public on the SCAQMD's website**

The current version of R1148.2 (e)(3) allows a chemical supplier to assert a trade secret protection claim for chemicals used in any of well activities covered by the rule. The following information can be claimed as trade secret on the Chemical Report Forms: chemical identity of some or all ingredients of a trade name product; CAS number of the chemical ingredient; and maximum concentration of a chemical ingredient within a trade name product. SB 4, however, states that identities of chemicals and their CAS numbers used in well stimulation treatments applicable under SB 4, shall not be protected as trade secret.

Proposed ~~a~~Amended Rule 1148.2 will introduce reporting requirements disallowing trade secret claims for chemical identities and CAS numbers of chemicals used in well stimulation activities falling under SB 4's jurisdiction. The part of the R1148.2 reporting portal for the reporting of trade secret chemicals will be redesigned to differentiate between trade secret claims for chemicals and CAS numbers used in well activities that are covered by the SB 4 and those that are not. Suppliers can no longer assert trade secret claims for identity and CAS numbers of chemicals used in well stimulation activities that fall under the SB 4 regulations, therefore making the identities of all chemicals used in well activities that fall under SB 4 available to the public on the SCAQMD website.

### **Increasing the Minimum Notification Time from 24 hours to 72 hours**

During the development of PAR 1148.2, environmental and community representatives requested that minimum well event notification timeframe be increased from 24 to 72 hours, such that operators will be required to provide notifications for Rule 1148.2 well activities at least 72 hours before the well activity begins. Community representatives have commented that families need 72 hours notice to modify their day to leave their residence or make other arrangements. As a result, the SCAQMD staff is proposing to amend Rule 1148.2 to increase the minimum notification timeframe from 24 to 72 hours. PAR 1148.2 clarifies that there is a 24-hour window from the originally projected start date and time to begin the well event without filing a new notification. There is no change to the current requirement that the maximum number of days that a well event notification may be submitted prior to the start date is 10 days, so PAR1148.2 proposes a the notification period of 72 hours to 10 days before the start date.

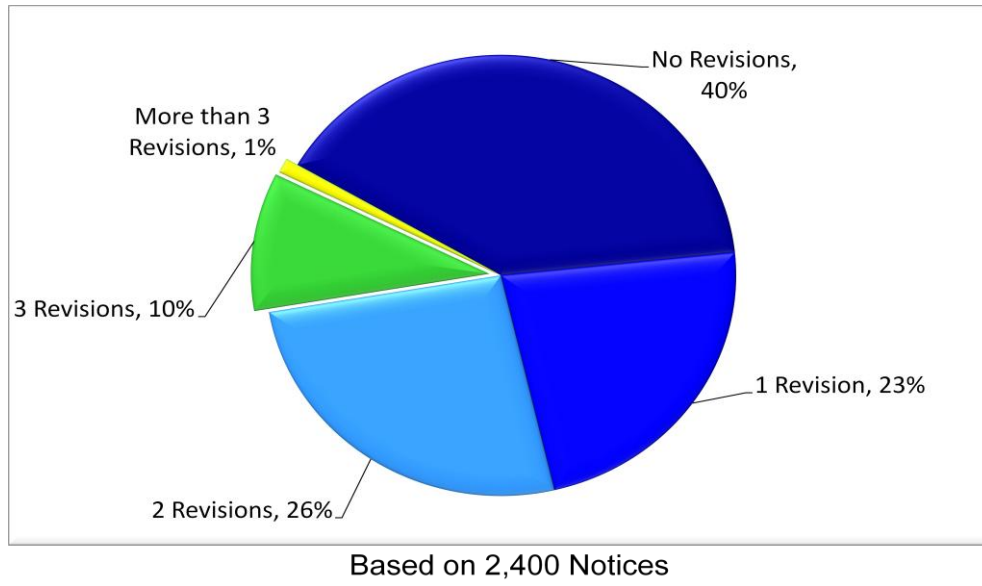
During the development of PAR 1148.2, operators had commented that a 72 hour notification period before the start date was a concern if they would be required to wait 72 hours if the event was delayed and they needed to re-notify. Operators commented that there are frequent last minute delays common in the well drilling and treatment operations due to scheduling equipment, delays in receiving equipment, operational delays at the site, to name a few. In addition, requiring operators to wait 72 hours every time an event is delayed may be frustrating to the public if they are trying to schedule and make arrangements based on when the well activity is expected to occur.

Rule 1148.2 operators have indicated that there are many reasons why a well drilling, rework, or completion may need to be delayed which is beyond the control of the operator. These reasons include the following:

- Well drilling equipment availability driven by maintenance and on-site availability often lead to delays in starting a well drilling event.
- Geological/down-hole variabilities can lead to typical delays in beginning a well drill event due unforeseen conditions that cause adjustments or re-evaluations to well drilling protocols and needed on-site equipment and materials.
- Maintenance work variabilities including pre-drilling activities such as removal of well head equipment, well bore preparation, or need for unplanned acid jobs.
- Issues related to contractor's equipment, supplies, and service logistics not being available at the projected time.
- Utility and facility issues such as power failures
- Unforeseen weather and travel events such as fog, high winds, rain, and roadway closures.

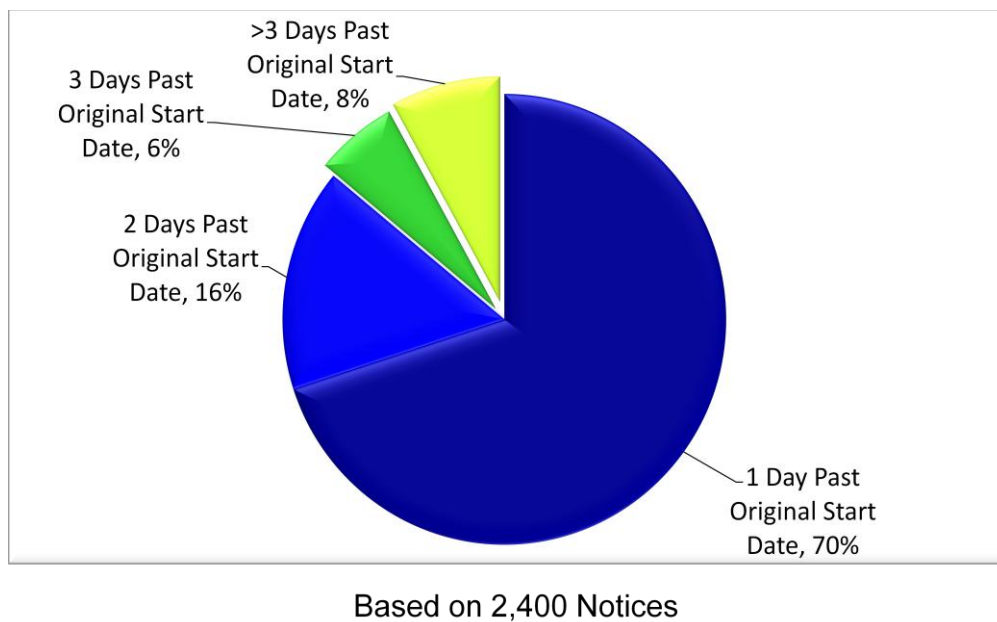
The SCAQMD staff evaluated the existing Rule 1148.2 database to determine the frequency that original notifications were revised based on the activity starting on a later date than originally projected. The data evaluation showed that since June 2013, approximately 60 percent of all notices were revised due to a change in the well activity start date. Figure 1 – Distribution of Revisions to Notifications shows, of all notifications received, about 90 percent of the notifications have 2 revisions or less. The minimum notification period for these notifications is based on Rule 1148.2 which currently requires a 24-hour to 10 day notification period.

**Figure 1**  
**Distribution of Revisions to Notifications**



The notifications are further broken down by examining the percentage of events that go a specific amount of days past the projected event. This breakdown is shown in Figure 2 – Number of Days Expected Start Date is Moved.

**Figure 2**  
**Number of Days Expected Start Dates is Moved**



The breakdown from Figure 2 demonstrates that the overwhelming majority (~85 percent) of notices which were revised to reflect a new start date, were submitted to start the well event between one and two days of the original start day.

As a result, the SCAQMD staff is proposing to amend Rule 1148.2 to allow operator's the ability to submit 24-hour extensions to the original 72-hour notice requirement. PAR 1148.2 limits the number of 24-hour extensions to five. Each 24-hour extensions will take effect following the end of the original previous 24-hour window (in the case of the originally projected start date and time), or the previous 24-hour extension. The time basis for the end of the 24-hour extensions shall be the end of the 24-hour window following the originally projected start date and time. Before the end of the fifth 24-hour extension, if the well activity is still not projected to begin, the proposed amended rule requires that the operator cancel the last noticed event. If the operator wishes to proceed with the well event following this cancelation notice, the operator shall comply with a new minimum 72-hour notification. This approach provides additional flexibility to operators in scheduling well events and also ensures a level of certainty to the impacted community that a previously scheduled well event will occur within a given timeframe from the originally noticed projected start date and time.

To address the community's concern that repeated revisions might lead to increased uncertainty and "serial" re-notifications, the SCAQMD is proposing to report back to the Board through the Stationary Source Committee, regarding findings on the numbers of re-notifications and extensions as a result of the 72-hour pre-notification requirement.

## **Other eChanges**

### Trade Name Product Volume

Existing Rule 1148.2 (e)(1)(E)(i) contains a requirement that the operator report the volume of well drilling, well rework and well completion fluids used in the well event activity. Effective April 5, 2015, the information reported under paragraph (e)(1) of the rule is no longer required due to a sunset provision placed in the rule language during its original adoption. The SCAQMD staff has determined that this information is still pertinent to our monitoring and evaluation of the events covered by the rule because it provides a basis for the overall magnitude of the fluids injected into the well. As such, PAR 1148.2 will still maintain the requirement for the ~~supplier and~~ operator to report the total well drilling, well rework and well completion fluids used during the well event activity.

In addition to the well fluid, the SCAQMD staff is also proposing to carry over the pre-existing requirement specified in paragraph (e)(1) for the operator to report the well activity end date. This will now be submitted under the operator reporting requirements specified in paragraph (e)(4) of the proposed amended rule.

### Other Administrative Changes

The SCAQMD staff is also proposing the following minor changes/additions to Rule 1148.2:

- ~~Added a definition for "Well Rework Fluid" which means a carrier fluid mixed with chemical and/or physical additives used in any operation subsequent to drilling that involves a well production stimulation or treatment activity of an existing well.~~

- Subparagraph (d)(1)(E) was amended to add language clarifying that start times for each well event notification is to be submitted along with the start date. This subparagraph was also amended to clarify that the original projected start date and time extends up to a 24 hour window following the originally projected start date and time.
- ~~Existing subparagraph (d)(2)(B) is proposed to be modified in order to clarify that when revisions or cancellation to an original Rule 1148.2 Notification Form are submitted, the basis for determining the timeframe for submittal would be on or before the original start date.~~
- ~~New paragraph (d)(5) is proposed to be added in order to clarify that operators submitting revision notifications when the new start date for the well event has changed would also be subject to the original submission timeframes that are specified in existing paragraph (d)(1) (e.g., no less than 24 hours day no more than 10 calendar days prior to the new start date).~~
- A definition of Well Rework Fluid is being added for clarity.
- Subdivision (f) has also been revised to maintain consistency with the rule language changes specified in paragraphs (e)(2) through (4). For instance the total volume and density of the trade name product has been deleted from subdivision (f) since we no longer require it to be submitted.

### **Water Injection Wells**

During the rulemaking process, some environmental and community representatives have commented that Rule 1148.2 should include water injection wells at oil production fields since water injection wells undergoing well treatments such as acidizing, can have similar emission sources as oil and gas production wells undergoing the same type of treatment. When Rule 1148.2 was adopted, water injection wells were not included since SCAQMD staff was informed that there is no flowback from water injection wells, and flowback fluids or fluids that returned to the surface were the primary air quality concern. Community representatives have commented that they are concerned about the equipment and chemicals that are being used, and are asking to be notified. SCAQMD staff has explained that ~~Before staff proposes to expand the applicability of Rule 1148.2 to include water injection wells that are conducting Rule 1148.2 well stimulation activities,~~ additional time is needed to assess the potential sources that could be affected if Rule 1148.2 includes water injection wells. ~~SCAQMD staff will continue to evaluate this issue. Staff will be revisiting this issue and other potential future amendments to Rule 1148.2 and report~~ The adoption resolution includes a commitment for staff to return to the Stationary Source Committee in the first quarter of 2016 and potential amendments to Rule 1148.2 no later than mid-2016~~after the July Governing Board meeting regarding water injection wells.~~

Another concern brought up by environmental and community groups is the need for signage to be posted at well sites to provide another means of making the public aware of ongoing well

activities applicable under the rule. There is insufficient time to include a signage provision in the proposed amended rule going to the Board in July. Staff will continue to evaluate this addition and others such as Best Management Practices (BMPs) and report back to the Stationary Source Committee.

## **AFFECTED SOURCES**

SCAQMD Rule 222 - Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II, currently requires owners and operators of oil and gas wells to register each well group (consisting of no more than four well pumps at a crude oil production and handling facility) subject to Rule 1148.1 – Oil and Gas Production Wells. Rule 1148.1 applies to onshore oil producing wells, well cellars and produced gas handling activities at onshore facilities where oil and gas are produced, gathered, separated, processed and stored. The equipment registration requirement for oil wells in Rule 222 is a streamlined alternative to the standard air quality permitting process.

Based on an evaluation of records associated with the Rule 222 filing requirements for the “Oil Production Well Group” category, there are ~~273~~242 facilities operating approximately ~~4,614~~4,320 onshore oil and gas wells in the District. Due to the geography of the region, the affected facilities are often located in urban areas, and sometimes located within close proximity to residential and other sensitive receptors. Based on well records from DOGGR’s database, there are approximately 6,100 oil, gas, and geothermal wells that are active or idle in the Los Angeles, Riverside, San Bernardino, and Orange County regions. The discrepancy between the number of wells accounted for by Rule 222 versus DOGGR’s database is mainly because DOGGR’s program includes geothermal and injection wells and the Rule 222 database does not.

Based on an evaluation of SCAQMD records collected since the start of reporting in June 2013, approximately 25 well operators have been submitting well activities notices and 18 chemical suppliers have been providing chemicals to the operators.

The proposed requirements in PAR 1148.2 to report the chemicals used during well drilling, completion, and reworks will affect the operators and suppliers of chemicals used during these processes. As with the current rule, the proposed requirements in PAR 1148.2 would require well operators and/or their chemical suppliers to submit to the SCAQMD a comprehensive listing of the chemicals contained in the well drilling fluids, well rework fluids, and well completion fluids. This information, excluding certain “trade secret” information, would then be made publicly available on the SCAQMD’s website. Proposed Amended Rule 1148.2 will only modify the type and manner in which information is reported, submitted and disclosed to the public on the SCAQMD’s Rule 1148.2 Public Information Portal and will not change the basic requirements or compliance process of the current rule.

## **IMPACT ASSESSMENT FOR PROPOSED AMENDED RULE 1148.2**

Implementation of Proposed Amended Rule 1148.2 will not result in emission reductions as it is an administrative rule with no pollution control requirements or control measures. The purpose of PAR 1148.2 is to revise the current reporting requirements for drilling, well rework, and well completion chemicals and trade name products in order to be more consistent with SB 4 and DOGGR’s reporting structure. Specifically for hydraulic fracturing and other well stimulation

activities applicable under SB 4, PAR 1148.2 will: 1) disaggregate the reporting of the trade name products from the chemical ingredients within the product; 2) no longer require the reporting of chemical mass concentration within the trade name product, and instead require the chemical's ~~mass maximum concentration in percent by mass within the total well drilling, well rework, and well completion fluid~~ to be reported; and 3) make all the SB 4 related well stimulation information deemed not to be trade secret under SB 4 provisions, available to the public on the SCAQMD's website. The proposed amended rule will require the reporting of the items specified in items one (1) and two (2) for non-SB 4 related activities as well. Additional minor changes to rule language have been also made for clarity and consistency.

## **SOCIOECONOMIC ANALYSIS**

PAR 1148.2 would revise the current reporting requirements for drilling, well rework, and well completion chemicals and trade name products in order to increase the notification submission timeframes, streamline the reporting process, and be more consistent with SB 4 and DOGGR's reporting structure. Thus, implementation of PAR 1148.2 will not result in emission reductions as it is administrative in nature and cost impacts are expected to be minimal, and as such there are no significant adverse socioeconomic impacts. The SCAQMD staff has worked with the Working Group members to streamline chemical reporting requirements to minimize impacts and has also taken steps to structure the reporting process to be nearly identical to the current system to ensure a smooth transition for operators and suppliers. Increasing the minimal timeframe for notifications from 24 to 72 hours with five 24-hour extensions may require additional re-notifications, however, staff has streamlined the notification portal to populate most information for extensions to minimize any significant costs. Costs associated with the proposed amendments are projected to be minimal. Therefore, no cost estimates are provided.

~~PAR 1148.2 would revise the current reporting requirements for drilling, well rework, and well completion chemicals and trade name products in order to streamline the reporting process and be more consistent with SB 4 and DOGGR's reporting structure. Thus, implementation of PAR 1148.2 will not result in emission reductions or additional costs as it is administrative in nature and does not have adverse socioeconomic impacts. The SCAQMD staff will take steps to structure the reporting process to be nearly identical to the current system to ensure that the affected operators and suppliers will have a relatively smooth transition. Costs associated with this transition are projected to be minimal. Therefore, no costs estimates are provided.~~

## **CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)**

SCAQMD staff has reviewed the proposed project pursuant to CEQA Guidelines §15002 (k) – General Concepts, the three-step process for deciding which document to prepare for a project subject to CEQA and CEQA Guidelines §15061 – Review for Exemption, procedures for determining if a project is exempt from CEQA. Because the SCAQMD is ~~proposing to incorporate state regulatory requirements into~~ amending Rule 1148.2 to align it with the requirements in SB 4, without exercising discretion with regard to the proposed amendments, the project is considered to be ministerially exempt from CEQA pursuant to CEQA Guidelines §15268 – Ministerial Projects. Furthermore, the SCAQMD has determined that it can be seen with certainty that there is no possibility that the proposed project may have any significant



effects on the environment, and is therefore, also exempt pursuant to CEQA Guidelines §15061 - Review for Exemption, paragraph (b)(3) – “general rule” exemption. A Notice of Exemption has been prepared pursuant to CEQA Guidelines §15062 - Notice of Exemption. If the proposed project is approved, the Notice of Exemption will be filed with the county clerks of Los Angeles, Orange, Riverside and San Bernardino counties.

## **FINDINGS UNDER CALIFORNIA HEALTH AND SAFETY CODE SECTION 40727**

### **Requirements to Make Findings**

California Health and Safety Code §40727 requires that prior to adopting, amending or repealing a rule or regulation, the SCAQMD Governing Board shall make findings of necessity, authority, clarity, consistency, non-duplication, and reference based on relevant information presented at the public hearing and in the staff report.

### **Necessity**

The SCAQMD Governing Board finds and determines that a need exists to adopt Proposed Amended Rule 1148.2 because some of the current trade secret provisions are inconsistent with Senate Bill (SB) 4. The regulations implementing SB 4 were finalized in December 2014 and the final reporting requirements for applicable well stimulation treatment activities take effect on July 1, 2015. However, interim regulations which have similar requirements are already in effect throughout the state.

### **Authority**

The SCAQMD Governing Board has authority to adopt Proposed Amended Rule 1148.2 pursuant to the California Health and Safety Code §§ 39002, 40000, 40701, 40702, 40725 through 40728, 41508, 41511, and 41700.

### **Clarity**

The SCAQMD Governing Board finds and determines that Proposed Amended Rule 1148.2 is written or displayed so that its meaning can be easily understood by the persons directly affected by the rule. Proposed Amended Rule 1148.2 has gone through a public process to determine if there is sufficient clarity in the proposed rule language. This public process included reconvening the Rule 1148.2 Working Group established during the original rule adoption process, made of the oil and gas well production industry, environmental organizations, and the public at large. Significant input from the participating stakeholders ensures that the proposed amended rule is clear and written in a manner that it can easily be understood by the affected industry.

### **Consistency**

The SCAQMD Governing Board finds and determines that PAR 1148.2 is in harmony with and not in conflict with or contradictory to, existing statutes, court decisions or state or federal regulations. Proposed Amended Rule 1148.2 revises the trade secret and reporting requirements for drilling, well rework and well completion chemicals and trade name products in order to be more consistent with SB 4 and DOGGR’s implementing regulations.

## Non-Duplication

The SCAQMD Governing Board has determined that Proposed Amended Rule 1148.2 will not impose the same requirements as any existing state or federal regulations. The pre-production activities applicable under Proposed Amended Rule 1148.2 are also regulated by the California Department of Conservation/Division of Oil, Gas, and Geothermal Resources DOGGR and the U.S. EPA. However, Rule 1148.2 was adopted in April, 2013, prior to the adoption of DOGGR's regulations. Under California Code of Regulations, Title 14, Division 2, Chapter 4, subchapter 2, DOGGR requires that operators conducting oil and gas well treatment stimulation submit detailed information about fluids used, and publically disclose this information on a Division website. Applicable well stimulation treatments under DOGGR's SB 4 regulation include various hydraulic fracturing activities such as "fracking", "acid fracking", as well "matrix acidizing."

Reporting requirements for chemical ingredients used in hydraulic fracturing, acid fracturing, and matrix acidizing fluids are also included in PAR 1148.2. While there is a partial overlap, PAR 1148.2 goes beyond DOGGR's SB 4 regulations by requiring the disclosure of chemicals used in well drilling, gravel packing and maintenance acidizing activities not covered by DOGGR's SB 4 regulations. Since initial rule implementation in June 2013, over ninety percent of the well activity events have been non-SB 4 related. This trend is expected to continue, so less than ten percent of the future well activity events will overlap with SB 4-related well activity events. Therefore, the proposed modifications to the reporting requirements of PAR 1148.2 are non-duplicative with DOGGR's SB 4 regulations and provide a higher level of disclosure because it requires disclosure for routine operations that take place more often in the District than hydraulic fracturing-based operations. In addition, PAR 1148.2 requires reporting of total mass of the trade name products, the ~~maximum concentration of each~~mass of each chemical ingredient ~~in percent by mass within the total well drilling, well rework, and well completion fluid to be reported,~~ and whether any of the chemical ingredients are classified as air toxics.

## Reference

By adopting PAR 1148.2, the SCAQMD Governing Board references the following statutes which SCAQMD hereby implements, interprets or makes specific: California Health and Safety Code §§ 41700 (nuisance), 40460(c) (emissions data), 40913(a)(5) (emission inventory), 41511 (determination of emissions from a source), and Federal Clean Air Act § 112 (Hazardous Air Pollutants), and Sen. Bill No. 4 (2012-2013 Reg. Sess.), codified at Cal. Pub. Res. Code §§ 3213, 3215, 3236.5, 3401, 3150 et seq, Cal. Code Regs. tit. 14, §§ 1761, 1780 et seq.

## COMPARATIVE ANALYSIS

Health and Safety Code section 40727.2 requires a comparative analysis of the new provisions of the proposed amended rule with any rules and regulations applicable to the same source. The pre-production activities applicable under Proposed Amended Rule 1148.2 are also regulated by Senate Bill 4 and DOGGR's regulation implementing the legislation.

**Table 2**  
**Comparison of PAR 1148.2 with DOGGR's SB 4 Regulations**

<b><u>Rule Element</u></b>	<b><u>PAR 1148.2</u></b>	<b><u>DOGGR's SB 4 Regulations</u></b>
<u>Applicability</u>	<ul style="list-style-type: none"> <li>• <u>Hydraulic Fracturing</u></li> <li>• <u>Acid Fracturing</u></li> <li>• <u>Acid Matrix Stimulation Treatment</u></li> <li>• <u>Maintenance Acidizing</u></li> <li>• <u>Gravel Packing</u></li> <li>• <u>Drilling</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Hydraulic Fracturing</u></li> <li>• <u>Acid Fracturing</u></li> <li>• <u>Acid Matrix Stimulation Treatment</u></li> </ul>
<u>Minimum Notification Time Frame prior to Well Events</u>	<ul style="list-style-type: none"> <li>• <u>Both the public and the AQMD receive notification 72 hours prior to well activity with five 24 hour extensions</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Property ones and tenants receive a a30-day notification of well stimulation event</u></li> <li>• <u>The Division receives notification 72 hours prior to well stimulation commencement</u></li> </ul>
<u>Reporting Trade Name Product</u>	<ul style="list-style-type: none"> <li>• <u>Report the identity of Trade Name Product</u></li> <li>• <u>Mass of Trade Name Product</u></li> <li>• <u>Purpose</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Same</u></li> <li>• <u>Mass concentration within total well stimulation fluid</u></li> <li>• <u>Same</u></li> </ul>
<u>Reporting Requirements for Chemical Ingredients</u>	<ul style="list-style-type: none"> <li>• <u>Chemical ingredient names</u></li> <li>• <u>CAS#</u></li> <li>• <u>Mass of chemical ingredient</u></li> <li>• <u>Identify if chemical is an air toxic</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Same</u></li> <li>• <u>Same</u></li> <li>• <u>Maximum mass concentration of chemical ingredient within total well stimulation fluid</u></li> <li>• <u>No requirement</u></li> </ul>
<u>Is Trade Secret allowed for Chemicals Ingredients undergoing an SB 4 related well activity?</u>	<ul style="list-style-type: none"> <li>• <u>Yes, only total mass of chemical ingredient can be claimed trade secret</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>SB 4 does not list the mass concentration of the chemical ingredient within the total well stimulation fluid as being</u></li> </ul>

<u>Rule Element</u>	<u>PAR 1148.2</u>	<u>DOGGR's SB 4 Regulations</u>
		<u>something that cannot be claimed as trade secret</u>
<u>Is Trade Secret allowed for Chemicals Ingredients undergoing non-SB 4 related well activity?</u>	<ul style="list-style-type: none"> <li>• <u>Yes, chemical ingredient identity, CAS#, and total mass can be claimed trade secret.</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Not applicable</u></li> </ul>
<u>Reporting Structure</u>	<ul style="list-style-type: none"> <li>• <u>Trade Name Products and chemical ingredients disaggregated</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Similar</u></li> </ul>

## **REFERENCES**

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## REFERENCES

California Legislative Information, Senate Bill No. 4, Oil and Gas: Well Stimulation, 2013-2014, [http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201320140SB4](http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB4).

Department of Conservation, Division of Oil, Gas, and Geothermal Resources, SB4 Well Stimulation Treatment Regulations, <http://www.conservation.ca.gov/index/Pages/prpsregs.aspx>.

South Coast Air Quality Management District Rule 1148.2 “Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers”, Adopted April 5, 2013, <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1148-2.pdf?sfvrsn=6>.

Staff Report “Proposed Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers “ April 2013, <http://www.aqmd.gov/docs/default-source/compliance/rule-1148-2-staff-report.pdf?sfvrsn=4>.

California Legislature, 2012. Senate Bill No. 4, Introduced by Senator Pavley. An act to amend Section 3213 of, and to add Article 3 (commencing with Section 3150) to Chapter 1 of Division 3 of, Public Resources Code, relating to oil and gas. Article 3 – Hydraulic Fracturing.

California Department of Conservation; Division of Oil, Gas, and Geothermal Resources, 2012.

## **APPENDIX A - COMMENTS AND RESPONSES**

## Comments Received at Public Workshop Held on April 15, 2015

**1. Comment:** The proposed amended rule should require operators to conduct sampling and testing of air emissions if filing a trade secret claim. Such information is not considered a trade secret under SB 4.

**Response:** Proposed Amended Rule 1148.2 is a narrowly focused revision to our existing rule which changes the chemical reporting provisions in order to be more consistent with chemical reporting under the system established by Senate Bill (SB) 4 (2012-2013 Reg. Sess.) and the Division of Oil, Gas, and Geothermal Resources' (DOGGR) regulations implementing SB 4 [Title 14, Division 2, Chapter 4, Subchapter 2 of the California Code of Regulations]. However, the proposed amended rule will continue to require specific information not specified under state law, such as existing notification and reporting requirements for other well activities not covered under SB 4. Adding sampling and testing requirements is not included in the scope of this narrowly focused amendment. In addition, the SCAQMD staff is planning to conclude our evaluation of the Rule 1148.2 submitted reports and sampling and monitoring program and report our findings and recommendations to the Stationary Source Committee, ~~the May/June time frame~~. This sampling and monitoring program included well events using chemical ingredients both claimed as trade secret and non-trade secret. It is unknown at this time whether sampling and monitoring provisions will be part of our future recommendations.

**2. Comment:** When will the rule be amended to address air emissions? When the rule was originally adopted in 2013 there was a promise to return in two years and propose additional requirements to control air emissions. In addition, based on the November 2014, Rule 1148.2 Working Group presentation there are obvious impacts from these well activities especially from on-site engines and fluid flowback. Therefore, why aren't you completing this task with this amendment?

**Response:** Proposed Amended Rule 1148.2 is a narrowly focused revision to our existing rule which changes the chemical reporting provisions in order to be more consistent with state law. Addressing additional requirements is not included in the scope of this narrowly focused amendment. However, the commenter is correct in stating that the SCAQMD staff committed to return to the Governing Board (after a two-year evaluation period) and advise them on our findings and recommendations on the need for controls or additional requirements for applicable well treatment activities. Staff will be reporting at the July Governing Board meeting findings on implementation of Rule 1148.2. After the July Governing Board meeting, staff will provide a report to the Stationary Source Committee. ~~We are nearing the end of the evaluation period and plan to report our findings and recommendations in the May/June time frame.~~ Until that time, it is



premature to speculate on what changes to the rule (if any) are recommended. The commenter is also referred to the response to comment # 1.

- 3. Comment:** The proposed amended rule should include a revision to broaden the information that is available to the public on the District's website by posting the Emission Source Reports on line.

**Response:** The SCAQMD staff has continually presented the information contained in Rule 1148.2 (e)(1) (i.e., Emission Source Reports) through our presentations to the Rule 148.2 Working Group and Stationary Source Committee. In addition, the information is available through a Public Records Act Request. With this requirement having sunset in April 2015, it is unnecessary to revise the rule to change this requirement. ~~However, the SCAQMD will consider this change for pre-existing reports when making its final recommendations and findings to the Governing Board.~~ However, the SCAQMD staff is committed to revise the Rule 1148.2 Public Portal to accommodate portal enhancements so that the public will be able to search by multiple criteria and have access to the additional reporting forms. We have already initiated this process by working with the Information Management Division to start working on these enhancements. These enhancements are expected to be completed within the fourth quarter of 2015.

- 4. Comment:** Our review of the information available on line is that the submitted operator reports routinely have errors in identifying whether chemical ingredients are correctly listed as air toxics. The District should take steps to rectify these errors.

**Response:** The SCAQMD staff has taken steps to ensure that the information that comes in to the reporting portal is correct. Our staff has reviewed hundreds of submittals of chemical reports from suppliers for accuracy, especially as it relates to whether chemical ingredients are properly classified as air toxics, as well as whether the suppliers are properly distinguishing between chemical ingredients and chemical family names. This evaluation has resulted in hundreds of Chemical Supplier Report re-submittals. The SCAQMD staff will continue to monitor the submittals in order to maintain an accurate data base.

- 5. Comment:** There has been insufficient effort to properly enforce Rule 1148.2, as well as some confusion in the community on whether Rule 1148.2 is for data gathering only and doesn't need enforcement. Can you please explain this contradiction?

**Response:** A significant number of resources have been devoted in the past two years which resulted in over 100 inspections of oil and gas sites performing well

drilling, rework, and completion activities. There also have been numerous sampling and monitoring site visits where samples were taken and emissions analyzed. Additionally, there have been Notices to Comply issued on over 140 well events to operators as well as for over 60 well events to suppliers. There have also been Notices of Violation issued on over 14 well events to operators. The SCAQMD staff has also worked with the suppliers to correct reporting errors in their reports resulting in hundreds of Chemical Supplier Reports being re-submitted.

The original intent of the rule was to collect and evaluate data related to the air quality impacts from well drilling, well rework, and well completion operations, as well as providing public disclosure of when a well event will occur and the additives and chemical ingredients used during the event. This information is made available through our public reporting portal on the SCAQMD's website and through email. As stated earlier in this response, the SCAQMD has been routinely enforcing the rule provisions. Therefore, the SCAQMD staff does not see a contradiction. There is a data gathering component and an enforcement component.

**6. Comment:** Acidizing at injection wells should be included in the proposed amended rule language.

**Response:** During the rulemaking process, some environmental and community representatives have commented that Rule 1148.2 should include water injection wells at oil production fields since the emission impacts from water injection wells undergoing well treatments such as acidizing, can have similar emission sources as oil and gas production wells undergoing the same type of treatment. When Rule 1148.2 was adopted, water injection wells were not included since SCAQMD staff was informed that there is no flowback from water injection wells, and flowback fluids or fluids that returned to the surface were the primary air quality concern when Rule 1148.2 was adopted in 2013. Before staff proposes to expand the applicability of Rule 1148.2 to include water injection wells that are conducting Rule 1148.2 well stimulation activities, additional time is needed to assess the potential sources that could be affected. Staff will continue to evaluate this issue and provide an update and recommendations to the Stationary Source Committee regarding water injection wells that are conducting Rule 1148.2 well stimulation activities. The adoption resolution includes a commitment for staff to return to the Stationary Source Committee regarding water injection wells and potential amendments to Rule 1148.2. Proposed Amended Rule 1148.2 is a narrowly focused revision to our existing rule which changes the chemical reporting provisions in order to be more consistent with state law. Addressing additional requirements is not included in the scope of this narrowly focused amendment. Expansion of the rule applicability to

~~waste water injection wells is something the SCAQMD staff may consider in the future recommendations to the Governing Board.~~

- 7. Comment:** In order to further protect families and communities, the proposed amended rule should require a 72-hour original notice requirement in lieu of the existing 24-hour notice requirement.

**Response:** Expansion of the notification requirements to require noticing with a minimum 72 hours prior to the well activity is something the SCAQMD staff is planning to propose at the July 10, 2015 Governing Board meeting to address this issue.~~will consider when the SCAQMD staff will report their findings and recommendations to the Governing Board in the May/June timeframe.~~

### Written Comments Received

- 8. Comment:** Baker Hughes supports SCAQMD's efforts to revise Rule 1148.2 to ensure consistency with SB 4 and the California Department of Conservation Division of Oil, Gas and Geothermal Resources (DOGGR) regulations implementing SB 4. Specifically, Baker Hughes supports changes to Rule 1148.2 that would (1) disaggregate the reporting of the trade name product from the chemical ingredients within the product, and (2) require disclosure of the maximum concentration in percent by mass within the total well drilling, well rework, or well completion fluid, rather than within the trade name product

**Response:** Comment noted.

- 9. Comment:** As it is implemented today, Rule 1148.2 carries significant risk with regard to product formulations because it requires operators and chemical suppliers to associate the trade name product, its ingredients and each ingredient's concentration in the trade name product—i.e., the formula for the product—in the disclosure form and, absent trade secret claims, SCAQMD publishes the disclosed information in that associated form. This has the effect of unnecessarily increasing the number of trade secret claims for information that, if reported on a disaggregated basis, could otherwise be disclosed. The Staff Report is correct when it observes that disaggregating of the chemical ingredients from the trade name products helps limit the ability to determine the products' exact formulations. Further protection is provided by requiring disclosure of the maximum concentration of the chemical ingredients within the overall fluid, rather than within the trade name product. Our experience is that both of these changes will reduce, and in some cases eliminate, the potential for the disclosure to betray specific formulaic information to competitors, and

therefore that these changes will reduce the number of trade secret claims made in Rule 1148.2 disclosures.

**Response:** The SCAQMD staff agrees with your comment. The current version of Rule 1148.2 (e)(3), allows the suppliers of chemicals to claim trade secret protection for exact chemical identities, CAS numbers and concentrations of chemicals within each trade name product. The SCAQMD staff believes that some portion of trade secret claims is invoked due to the fact that Rule 1148.2 links trade name products to their chemical ingredients. By disaggregating trade names from chemical ingredients, the PAR 1148.2 reporting scheme provides for the complete disclosure of the identity of chemical ingredients while protecting the exact formulation of each trade name product, with the intent of greatly reducing trade secret claims. DOGGR's staff indicated that to date DOGGR has not received any trade secret claims for the chemical information submitted under the SB 4 interim regulations which also disassociates chemical ingredients from trade names. The proposed amended rule requires the ~~chemical mass concentration of each chemical ingredient within the total fluid~~ to be reported rather in lieu of the chemical mass concentration within the trade name product. This reporting scheme still retains the key information concerning chemical quantities while reducing the likelihood of trade secret claims.

**10. Comment:** In order to maximize the value of these changes to SCAQMD and regulated entities, Baker Hughes respectfully suggests that the proposed revisions to Rule 1148.2 explicitly articulate the District's intent that chemical ingredients need not be linked to their respective trade name product. Every change to a disclosure rule such as this one triggers work, internally and with our suppliers, to refine the terms and systems by which our suppliers are willing to provide information on products that we wish to continue utilizing in California. Clearly memorializing this change in the text of Rule 1148.2 would give regulated entities—and, importantly, their suppliers—confidence in SCAQMD's intended disclosure format and assurance that they will receive sufficient notice through SCAQMD's administrative procedures to evaluate the impact of any future additional change to these provisions on the products being offered in California. In order to enhance the efforts of the SCAQMD to reduce the number of trade secret claims made under Rule 1148.2, Proposed Amended Rule 1148.2 (e)(2) should be revised according to the following ~~strikeout~~ and underline changes:

(e) Reporting Requirements

(2) Except as provided in subparagraph (e)(2)(G) below...

(C) identity and chemical abstract service (CAS) number of each chemical ingredient used or contained in ~~each~~-trade name products identified in

**subparagraph (e)(2)(A), without being required to associate any chemical ingredient with any specific trade name product;**

(E) identification of whether ~~each~~ the chemical ingredient **identified in subparagraph (e)(2)(C)** ~~used or contained in the trade name product is an air toxic~~

**Response:**

While the Draft Staff Report clearly indicates that the justification for disassociating the chemical ingredients from the trade name products in PAR 1148.2 is to reduce the number of trade secret claims and thus increase the level of public disclosure, the SCAQMD agrees with the commenter that placing the proposed text into the proposed rule language provides additional clarity and intent. Therefore, PAR 1148.2 incorporates the proposed text.

**11. Comment:**

In order to enhance the efforts of the SCAQMD to reduce the number of trade secret claims made under Rule 1148.2, Proposed Amended Rule 1148.2 (e)(2) should be revised according to the following strikeout and underline changes:

(f) SCAQMD Website Posting of Chemicals

The Executive Officer shall make the following information as received under subdivision (e) available to the public for each event by operator name, well name, API well number, location, and date of activity on a website:

(1) For all **events** where no trade secret claim has been made:

(B) ~~Name~~ **Identity** and chemical abstract service (CAS) number of each chemical ingredient used or contained in each trade name products **identified in subparagraph (f)(1)(A)**, unless it has been claimed as a trade secret, **without associating any chemical ingredient with any specific trade name product;**

(2) For all events where a trade secret claim has been made:

(B) **Identity and chemical abstract service (CAS) number of each chemical ingredient used or contained in trade name products identified in subparagraph (f)(2)(A), unless it has been claimed as a trade secret, without associating any chemical ingredient with any specific trade name product.** If the chemical ingredient and/or CAS number have been claimed to be trade secret, then the Chemical Family name or similar descriptor will be posted

**Response:**

The SCAQMD staff agrees with the comment. The majority of the proposed text has been added to PAR 1148.2. Some of the text has not been added since it is unnecessary. The commenter is also referred to the response to comment #10.

**12. Comment:**

The proposed amended rule should require operators to conduct sampling and testing of air emissions if filing a trade secret claim. Such information is not considered a trade secret under SB 4. To accomplish this, the language specified below should be added to subdivisions 1148.2 (e) and (f).

(e) Reporting Requirements

(7) In the event that the supplier to an operator or the operator claims trade secret or proprietary status for any chemical or other component and the Executive Director has approved such claims, the operator shall be responsible for:

(A) Contracting with an independent third-party for collection through reporting of air emissions from flowback fluids through District approved contractors;

(B) Collection, storage, conveyance, analyses, and reporting of representative flow-based samples of all air emissions from the well and associated stimulating equipment and all tanks or venting systems connected thereto. Such collections shall include samples from initiation of flowback, periodically throughout the flowback process, and immediately before the cessation of the flowback;

(C) No flowback shall be discharged, transferred, and disposed of which has not been appropriately sampled at intervals of 2000 gallons;

(D) Analyses of all such samples shall be appropriately quality controlled and assured and shall include appropriate anion/cation, NORMs, any hydrocarbons, VOC, TAC, or TOC compounds at detectible levels (ppb);

(E) Reporting of collections through reporting activities and results shall be directly to the Executive Director with copies to the supplier(s) and operator.

(F) Approved Quality Control and Assurance Program for sampling, conveyance, analyses, and reporting for flowback

(f) SCAQMD Website Posting of Chemicals

(3) For all events where additional flowback analyses were required (where a trade secret claim had been made):

(A) Conditions and activities, dates, times, and operator and API well number;

(B) Complete VOC, TAC, and TOC and constituents compositions; and

(C) Estimated total fluids involved in flowback interval related to the sampling time.

**Response:** As mentioned previously, sampling and testing requirements are not included in the scope of this narrowly focused amendment. As part of the Board Resolution to adoption of Rule 1148.2, the SCAQMD staff committed to conduct sampling and monitoring during the two-year evaluation period for the rule. This sampling and monitoring program included well events using chemical ingredients claimed as trade secret. SCAQMD staff conducted over 100 site visits for Rule 1148.2-related activities. Sampling and monitoring of liquid and air emissions occurred at approximately 30 site visits at which four to six summa canisters were collected, and hand-held H<sub>2</sub>S, particular matter (PM<sub>2.5</sub>, PM<sub>10</sub>), and Toxic Vapor Analyzers (TVA) monitors were used. In addition, drilling mud and return fluid (when available) samples were also collected and analyzed. Additional requirements beyond what is needed to accomplish the goal of making Rule 1148.2 more consistent with SB 4 and the DOGGR reporting structure is not being considered in this amendments, but may be included in a future amendment for Rule 1148.2. ~~of the findings and recommendations to the Governing Board in the May/June time frame.~~ The commenter is also referred to the response to comment #1.

**13. Comment:** What data has the SCAQMD gathered to justify any the proposed changes? Providing the public notice of benign activities, which the District has confirmed in their emissions monitoring, only impacts those wishing to organize anti-oil protests and continue to misinform the public. Why should the District be concerned about this since it has nothing to do with their jurisdictional responsibilities?

**Response:** The proposed changes to the notification provisions result from community representatives who have commented that families need 72-hours notice to modify their day to leave their residence or make other arrangements in order to avoid the impacts from Rule 1148.2 well activities. As a result, the SCAQMD staff is proposing to amend Rule 1148.2 to increase the minimum notification timeframe from 24 to 72 hours. No final conclusions have been reached in regards to the air impacts from Rule 1148.2 well activities. The SCAQMD staff plans to present this information to the Stationary Source Committee. However,

interim findings presented at the Stationary Source Committee in November 2014, indicate that there are odors and engine emissions from these operations that may impact nearby residents. As a result, the proposed amended rule contains provisions to increase the minimum well event notification time from 24 hours to 72 hours prior to the originally projected date and time of the well event.

**14. Comment:** Due to the complexities of scheduling a Rule 1148.2 reportable activity (such as coordinating equipment and personnel), it is very important for the operator to have flexibility in determining the start of an activity. Because of these complexities, the start time is inevitably dynamic. At the same time, once these factors are lined up, the Operator has every incentive to proceed expeditiously, both to minimize high activity expenses and to act quickly for well protection and enhancement.

**Response:** The SCAQMD staff is aware of the inherent difficulties in scheduling Rule 1148.2 well activities. During the development of PAR 1148.2, operators had commented that a 72-hour notification period before the start date was a concern if they would be required to wait a 72 hours if they needed to re-notify. Operators commented that there are frequent last minute delays common in the well drilling and treatment operations due to scheduling equipment, delays in receiving equipment, operational delays at the site, to name a few. In addition, staff's evaluation of the existing Rule 1148.2 data base shows that at least sixty percent of all original well event notifications are revised at least once, and data shows that the majority of original well event notifications which undergo a date revision, are revised between one and three times. Language has been added that provides flexibility by allowing the operator to electronically file extensions in 24-hour increments, up to a maximum of five extensions. This will cover almost all cases where the projected date and time cannot be met.

**15. Comment:** Requiring a 72-hour re-notification delay after two revisions would impose substantial non-productive time at significant cost. For drilling operations, the daily rig charges are a minimum of \$60,000 per day, plus additional standby and labor charges. For gravel pack jobs, the condition of the well bore can degrade rapidly during delays. Significant delay will jeopardize the success of the gravel pack job and require additional work and cost. Further, at the extreme, a poor job can immediately render the well unusable or significantly decrease its useful life. Both types of damage would ultimately require re-drilling the well at a very high cost (in the millions of dollars). For acidizing, the mixture has a relatively short life before negative properties render the mixture unusable.

**Response:** The SCAQMD staff has modified the maximum two 24-hour extension provisions to now specify that an operator may seek individual 24-hour



extensions up to a maximum of five times after the originally projected well event date and time which provides a 24-hour window. If the well event will not occur within this five 24-hour extension period, the operator can cancel the last submitted extension and re-submit a new well event notification meeting a minimum 72-hour notification period. The operator can cancel the notification before five-24 hour extensions if it is expected that the well activity will be substantially delayed. If the operator cancels the event and submits a new notification, that new notification would be allowed to be extended in 24-hour increments, up to five times. This approach provides additional flexibility to operators in scheduling well events while minimizing waiting 72 hours to re-notify, and also ensures a level of certainty to the impacted community that a previously scheduled well event will occur within a given timeframe from the originally noticed projected start date and time.

**16. Comment:** If the District does ultimately increase the re-notification period, we strongly recommend that well drilling be exempted

**Response:** Since the proposed amended rule has been modified to increase the extension timeframes, the SCAQMD staff does not see a need to exempt well drilling operations in the proposed rule.

**17. Comment:** Increasing the minimum initial notification of the activities beyond 24 hours would only diminish the operators' ability to accurately predict when the activities will begin, and would only increase the need for start date revisions. In addition, from the perspectives of both the public and the operator, expeditious performance of a reportable activity will minimize its overall duration

**Response:** The SCAQMD staff agrees that increasing the minimum notification timeframes will decrease the accuracy of the originally projected start date(s) and time(s). However, since the proposed amended rule has been modified to increase the extension timeframes, the SCAQMD staff does see a need to remove the 72-hour minimum notification time period. A 72-hour minimum notification period provides the public with more advance notice. In regards to the expeditious performance comment, the SCAQMD staff does not see a nexus between a minimum notification time and the performance or duration of the Rule 1148.2 well activity.

## ATTACHMENT H



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

**SUBJECT: NOTICE OF EXEMPTION FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT**

**PROJECT TITLE: PROPOSED AMENDED RULE 1148.2 – NOTIFICATION AND REPORTING REQUIREMENTS FOR OIL AND GAS WELLS AND CHEMICAL SUPPLIERS**

Pursuant to the California Environmental Quality Act (CEQA) Guidelines, the South Coast Air Quality Management District (SCAQMD) is the Lead Agency and has prepared a Notice of Exemption for the project identified above.

The proposed project is amending Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers, to revise the reporting requirements for chemicals and trade name products used in well drilling, rework and completions in order to make the rule more consistent with Senate Bill (SB) 4 and the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) reporting structure. The proposed amended rule will continue to require specific information not specified under SB 4. SCAQMD staff has reviewed the proposed project pursuant to CEQA Guidelines §15002 (k) – General Concepts, the three-step process for deciding which document to prepare for a project subject to CEQA and CEQA Guidelines §15061 – Review for Exemption, procedures for determining if a project is exempt from CEQA.

Because the SCAQMD is proposing to incorporate state regulatory requirements into Rule 1148.2 without exercising discretion, the project is considered to be ministerially exempt from CEQA pursuant to CEQA Guidelines §15268 – Ministerial Projects. Furthermore, the SCAQMD has determined that it can be seen with certainty that there is no possibility that the proposed project may have any significant effects on the environment, and is therefore, also exempt pursuant to CEQA Guidelines §15061 - Review for Exemption, paragraph (b)(3) – “general rule” exemption.

A Notice of Exemption has been prepared pursuant to CEQA Guidelines §15062 - Notice of Exemption. If the proposed project is approved, the Notice of Exemption will be filed with the county clerks of Los Angeles, Orange, Riverside and San Bernardino counties.

Any questions regarding this Notice of Exemption should be sent to my attention at the above address. I can also be reached at (909) 396-2716. Mr. Edward Eckerle is also available at (909) 396-3128 to answer any questions regarding the proposed amendments.

**Date:** May 29, 2015

**Signature:** \_\_\_\_\_

A handwritten signature in black ink, appearing to read "Barbara Radlein".

Barbara Radlein  
Program Supervisor, CEQA Section  
Planning, Rule Development, & Area Sources

## NOTICE OF EXEMPTION

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<b>To:</b> County Clerks Counties of Los Angeles, Orange, Riverside and San Bernardino	<b>From:</b> South Coast Air Quality Management District 21865 Copley Drive Diamond Bar, CA 91765
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**Project Title:**

Proposed Amended Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers

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**Project Location:**

South Coast Air Quality Management District (SCAQMD) area of jurisdiction consisting of the four-county South Coast Air Basin (Orange County and the non-desert portions of Los Angeles, Riverside and San Bernardino counties), and the Riverside County portions of the Salton Sea Air Basin and the Mojave Desert Air Basin.

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**Description of Nature, Purpose, and Beneficiaries of Project:**

SCAQMD staff is proposing to modify the chemical reporting requirements in Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers, to be more consistent with state law. The California Department of Conservation, through its Division of Oil, Gas, and Geothermal Resources (DOGGR), adopted a well stimulation treatment regulation in response to the passage of Senate Bill (SB) 4 which was finalized in December 2014 and is scheduled to go into effect on July 1, 2015. Proposed Amended Rule (PAR) 1148.2 will: 1) disaggregate the reporting of the trade name product from the chemical ingredients within the product; 2) eliminate the requirement to report the chemical mass concentration within the trade name product, and instead, require the total mass of each chemical ingredient to be reported; and, 3) no longer allow specified SB 4-related well stimulation information to be deemed as trade secret and instead, make this information available to the public on the SCAQMD’s website. The SCAQMD is also proposing to increase the public notification period before a well activity begins from 24 hours to 72 hours to provide additional lead time to the public prior to the well event. PAR 1148.2 also includes changes to provisions for canceling and revising well event start times. Additional minor changes are also proposed to promote clarity, consistency, and enforceability throughout the rule.

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**Public Agency Approving Project:**

South Coast Air Quality Management District

**Agency Carrying Out Project:**

South Coast Air Quality Management District

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**Exempt Status:**

CEQA Guidelines §15002 (k)(1) - General Concepts (Three Step Process)

CEQA Guidelines §15061 - Review for Exemption

CEQA Guidelines §15268 - Ministerial Projects

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**Reasons why project is exempt:**

Staff has reviewed the proposed project pursuant to CEQA Guidelines §15002 (k) – General Concepts, the three-step process for deciding which document to prepare for a project subject to CEQA and CEQA Guidelines §15061 – Review for Exemption, procedures for determining if a project is exempt from CEQA. Because the SCAQMD is amending Rule 1148.2 to align it with the requirements in SB4, without exercising discretion with regard to the proposed amendments, the project is considered to be ministerially exempt from CEQA pursuant to CEQA Guidelines §15268 – Ministerial Projects. Furthermore, the SCAQMD has determined that it can be seen with certainty that there is no possibility that the proposed project may have any significant effects on the environment, and is therefore, also exempt pursuant to CEQA Guidelines §15061 - Review for Exemption, paragraph (b)(3) – “general rule” exemption.

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**Project Approval Date:**

SCAQMD Governing Board Hearing: July 10, 2015, 9:00 a.m.; SCAQMD Headquarters

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**Date Received for Filing:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

*(Signed Upon Project Approval)*

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BOARD MEETING DATE: September 4, 2015

AGENDA NO. 39

**PROPOSAL:** Amend Rule 1156 – Further Reductions of Particulate Emissions from Cement Manufacturing Facilities

**SYNOPSIS:** The proposed amendment seeks to minimize hexavalent chromium ( $\text{Cr}^{+6}$ ) emissions and risk from cement manufacturing operations and the property after facility closure while streamlining  $\text{Cr}^{+6}$  ambient monitoring. The proposed amendments will establish the conditions under which monitoring can be reduced or eliminated. In addition, the proposed amendments include a proposed modification to the fence-line ambient  $\text{Cr}^{+6}$  threshold to reflect changes made by the Office of Environmental Health Hazard Assessment to risk assessment guidelines, as well as proposing minor revisions.

**COMMITTEE:** Stationary Source, April 17, 2015; Reviewed

**RECOMMENDED ACTIONS:**

Adopt the attached resolution:

1. Certifying the Final Environmental Assessment for Proposed Amended Rule 1156 – Further Reductions of Particulate Emissions from Cement Manufacturing Facilities; and
2. Amending Rule 1156 – Further Reductions of Particulate Emissions from Cement Manufacturing Facilities.

Barry R. Wallerstein, D.Env.  
Executive Officer

PF:JW:TG:LP

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**Background**

Rule 1156 - Further Reductions of Particulate Emissions from Cement Manufacturing Facilities was adopted in November 2005. The original rule requires cement manufacturing facilities to comply with specific requirements applicable to various operations, as well as materials handling and transport at the facilities. Riverside Cement (RC) in Riverside and California Portland Cement Company (CPCC) in Colton are the two cement manufacturing facilities in the SCAQMD's jurisdiction subject to Rule 1156.

Rule 1156 was amended in March 2009 to further reduce particulate emissions and to address unexpected elevated ambient concentrations of the carcinogen, hexavalent chromium ( $\text{Cr}^{+6}$ ), observed at the Rubidoux station as part of the third Multiple Air Toxics Emissions Study (MATES III) and at monitors adjacent to the facilities. The 2009 rule amendments included the adoption of an ambient  $\text{Cr}^{+6}$  threshold of  $0.70 \text{ ng/m}^3$  (excluding background), based on a 100-in-a-million fence-line cancer risk. The rule amendment also required additional control measures, such as: clinker storage area protection,  $\text{Cr}^{+6}$  ambient monitoring, and wind monitoring, with contingencies (i.e., clinker enclosure based on  $\text{Cr}^{+6}$  results and PM10 monitoring in case of elevated concentrations). Under a Board adoption resolution, the need for and frequency of  $\text{Cr}^{+6}$  ambient monitoring was to be re-evaluated after five (5) years of data collection, and a working group was to be established to develop a Facility Closure Air Quality Plan Option (Facility Closure Plan).  $\text{Cr}^{+6}$  ambient monitoring results have been reported annually to the Stationary Source Committee beginning in 2011, and bi-annually to the Board beginning in 2012.

The criteria for facility closure and conditions to potentially sunset  $\text{Cr}^{+6}$  ambient monitoring were discussed with the working group in 2010 and 2011. A draft Facility Closure Plan was developed and presented to the Stationary Source Committee in 2012, but was left as a living document since neither facility was producing clinker at the time, and there was uncertainty regarding future cement manufacturing activities given the economic recession. Currently, neither cement manufacturing facility is producing clinker. The facilities only process clinker or cement material imported from facilities outside the SCAQMD's jurisdiction.

### **Proposal**

The proposed amendments include requirements for current owner(s)/operator(s) of the affected property before and after cement manufacturing facility closure, as well as conditions for potential reduction in the number of  $\text{Cr}^{+6}$  monitoring stations and elimination of  $\text{Cr}^{+6}$  ambient monitoring under specific conditions. The proposal is intended to minimize potential air quality impacts and potential health risk from cement facilities during operations and after closure while streamlining  $\text{Cr}^{+6}$  ambient monitoring.

Specifically, with a subsequent 12 consecutive months of  $\text{Cr}^{+6}$  monitoring below the operative fence-line threshold, each facility can reduce the number of monitors to one in the predominantly downwind direction. Also, monitoring must continue after facility closure and until the site is stabilized through either an approved mining reclamation plan or site clean-up/rehabilitation in association with sale of the property. After the site stabilization, and upon subsequent three months of  $\text{Cr}^{+6}$  monitoring below the operative fence-line threshold, the rule will cease to apply. It should be noted that the owner/operator may submit a site-specific assessment using soil sampling, historic site activity, or other means, identifying areas determined not to be potentially contaminated

by hexavalent chromium contamination. If approved by the Executive Officer, those areas determined not to be potentially contaminated may be excluded from the provisions regarding clean-up/rehabilitation of the property.

In addition, the proposed amendments also include revisions to the Cr<sup>+6</sup> ambient air monitoring fence-line threshold as a result of the 2015 update to the Office of Environmental Health Hazard Assessment's (OEHHA) risk assessment guidelines, and an update to background concentrations based on MATES IV data.

Staff proposes to change the Cr<sup>+6</sup> fence-line threshold from 0.70 ng/m<sup>3</sup> to 0.20 ng/m<sup>3</sup> (excluding background) effective September 16, 2016. The change from 0.70 ng/m<sup>3</sup> to 0.20 ng/m<sup>3</sup> maintains the 100-in-a-million risk threshold and reflects OEHHA guidelines that account for early-life exposures to air toxics. The rule does not specify the background levels, and previously the background level of 0.16 mg/m<sup>3</sup> was used based on two years of sampling data for the Basin. Staff proposes using Cr<sup>+6</sup> background levels of 0.062 ng/m<sup>3</sup> and 0.056 ng/m<sup>3</sup> for a 30-day and 90-day rolling average (a 1-in-3 or 1-in-6 sampling schedule), respectively, observed at the Fontana and Rubidoux stations as part of the fourth Multiple Air Toxics Exposure Study (MATES IV). These background concentrations will be used for Rule 1156 compliance purposes. Therefore, the proposed new effective limits would be 0.262 ng/m<sup>3</sup> and 0.256 ng/m<sup>3</sup>, respectively. If either of these levels is exceeded, as applicable, the facility must submit a compliance plan to address the fugitive emissions causing the exceedance. If the threshold is exceeded on or after September 5, 2018, it would be a violation of the rule. It should be noted that the compliance plan requirement will not apply to a facility that has an approved Health Risk Assessment or has been required to submit a Health Risk Assessment pursuant to Rule 1402 – Control of Toxic Air Contaminants from Existing Sources.

### **Key Issues**

Staff has worked closely with both cement manufacturing facilities and other stakeholders to resolve issues associated with the proposed amended rule.

RC is opposed to the new Cr<sup>+6</sup> fence-line ambient air monitoring threshold. They have future plans to increase production and raised a concern that they could have difficulty consistently meeting the lower levels, which could result in premature closing of that operation. From the most recent site visit to Riverside Cement, staff believes that there are opportunities for RC to implement additional precautionary measures to achieve the new standard, such as more frequent application of fugitive dust suppressants and/or better control of fugitive dust from cement bagging operations.

RC believes that monitoring after facility closure is unnecessary and that SCAQMD should rely on the regional monitoring network. However, the regional monitoring network does not monitor localized levels of air toxics. Staff is proposing to require continued monitoring at these facilities until three months after clean-up/rehabilitation

or reclamation is complete. This will help ensure public health protection from hexavalent chromium exposure, a known human carcinogen.

RC has also expressed concern that the proposed criteria for ceasing Cr<sup>+6</sup> monitoring post-closure is not sufficient. RC has suggested monitoring to continue for 60 days after facility closure, regardless of the clean-up/rehabilitation or reclamation status, unless access to monitoring is not available. Staff believes that monitoring before and during clean-up/rehabilitation is essential given the potential fugitive emissions of Cr<sup>+6</sup> contaminated soil. Staff is confident that the proposed criteria for ceasing Cr<sup>+6</sup> ambient air monitoring post-closure is a reasonable and sound approach to minimize potential air quality impacts from the property after cement facility closure without imposing significant burden on the owner(s)/operator(s) and duplicating other agencies' efforts relative to future redevelopment and use of the property.

In addition, in a collaborative effort, staff also conducted co-located monitoring and analyzed split samples with RC to evaluate potential discrepancies in monitoring collection or laboratory results and/or monitoring. No notable differences were found in the lab samples.

### **Public Process**

In addition to the working group meetings in 2011 and 2012, staff also met with representatives of CPCC and RC beginning in January 2015 to solicit comments on the proposed amendment concepts. Comments received were incorporated into the development of the initial proposed amendments.

Staff conducted a working group meeting on April 7, 2015 to present detailed proposed rule amendments. Draft rule language was released to the working group for their review and comment prior to presentation to the Board's Stationary Source Committee meeting on April 17, 2015. Staff conducted a public consultation meeting on April 22, 2015 near one of the cement facilities for ease of community participation to solicit input on the proposed rule amendment.

A public workshop was held June 18, 2015 to seek input on the additional elements added to the proposal since the public consultation meeting. The additional proposal elements included the proposed update to the Cr<sup>+6</sup> ambient air monitoring fence-line threshold and the implementation schedule, compliance requirements in the event the Cr<sup>+6</sup> levels are exceeded, and the criteria to validate duplicate PM10 source tests at low concentrations (significantly less than the emission limit of 0.01 grain/dscf). Following the public workshop, staff conducted a site visit to learn more about the current operational status at one facility. Staff also met with both facilities on two occasions in both May and July 2015.

Throughout the rule development process, significant changes were made to the proposed rule to address industry concerns. In response to industry's request, the Public

Hearing was rescheduled to September 2015 to allow additional time for stakeholders to provide comments.

### **California Environmental Quality Act**

SCAQMD staff has reviewed the proposed project pursuant to the California Environmental Quality Act (CEQA) Guidelines §15002 (k) – General Concepts, the three-step process for deciding which document to prepare for a project subject to the California Environmental Quality Act (CEQA). SCAQMD staff has determined that the proposed amendments to Rule 1156 are a discretionary action by a public agency, which has potential for resulting in direct or indirect changes to the environment and, therefore, is considered a “project” as defined by CEQA. SCAQMD staff’s review of the proposed project shows that the proposed project would not have a significant adverse effect on the environment. Therefore, pursuant to CEQA Guidelines §15252 and 15126.6(f), no alternatives are proposed to avoid or reduce any significant effects because there are no significant adverse impacts, and pursuant to CEQA Guidelines §15126.4(a)(3), mitigation measures are not required for effects not found to be significant. SCAQMD has prepared a draft Environmental Assessment (EA) to address the potential adverse environmental impacts associated with the proposed project which was released for a 30-day public review beginning on July 21 and ending on August 19, 2015. No comments were received on the CEQA document.

### **Socioeconomic Analysis**

The socioeconomic assessment was released with and is contained within the staff report as a part of the 30-day availability of documents. PAR 1156 would, among other amendments, establish a more stringent fence-line  $\text{Cr}^{+6}$  ambient monitoring threshold, effective September 5, 2016. The amendments would also reduce the required monitoring effort (i.e., number of monitors) by the affected facilities, provided that monitors consistently demonstrate ambient concentrations below the threshold as specified in the proposed amendments.

For ongoing cement manufacturing operations at a facility, continued compliance with the fence-line threshold for 12 months post adoption would allow the facility to reduce the number of ambient monitors to one in the principally downwind area. The ability to reduce the number of monitoring stations after meeting all criteria would potentially result in cost savings estimated at \$112,500 per year for one facility and \$30,500 per year for the other.

It is possible that one of the two affected facilities may not be able to consistently comply with the more stringent fence-line  $\text{Cr}^{+6}$  ambient monitoring threshold of 0.20 ng/m<sup>3</sup> without implementing additional control measures. This facility may need to submit a compliance plan, increase housekeeping measures, implement additional dust stabilization, and worst case, install control equipment. As previously noted, a compliance plan would not be necessary if the facility had previously approved or is currently required to submit a Health Risk Assessment pursuant to Rule 1402.



Depending on the risks estimated in the Health Risk Assessment, the facility may need to develop and implement a Risk Reduction Plan. The actions taken are likely similar under a compliance plan or a Risk Reduction Plan.

Compliance costs associated with compliance plan submission, if applicable, would include a one-time cost of \$1,925, which includes filing and plan evaluation fees. Under a compliance plan or Risk Reduction Plan, the potential cost of purchasing additional chemical stabilizers would be approximately \$243,000 annually based on the potential need of two additional applications per year to approximately 50 acres, cumulatively, of facility property. In addition, the construction of one additional steel partitioning wall within an existing building near a cement packaging operation may be necessary to contain dust within the building, as well as four PVC curtain doors to prevent dust from exiting the building. The capital cost of the partition and PVC curtains would approximately be \$172,000 and \$14,700, respectively. (Note: the partition is a worst case assumption as the facility may be able to achieve the necessary reductions through less costly compliance options, such as additional housekeeping measures, etc.)

Relative to the minor amendments regarding duplicate source tests, there is a potential cost savings in that unnecessary duplicate source testing will be avoided in the future while accomplishing the same goal as the current requirement.

When the annual compliance cost is less than one million dollars, the Regional Economic Impact Model (REMI) is not used to analyze impacts on jobs and other socioeconomic impacts because the impact results would be very small and would fall within the noise of the model.

### **Implementation and Resource Impact**

Existing SCAQMD resources will be sufficient to implement the proposed amendments with minimal impact on the budget.

### **Attachments**

- A. Summary of Proposed Amendments
- B. Rule Development Process
- C. Key Contacts
- D. Resolution
- E. Rule Language
- F. Staff Report
- G. Environmental Assessment

## ATTACHMENT A

### Summary of Proposed Amendments to Rule 1156 - Further Reductions of Particulate Emissions from Cement Manufacturing Facilities

The following summarizes the key proposed amendments to Rule 1156:

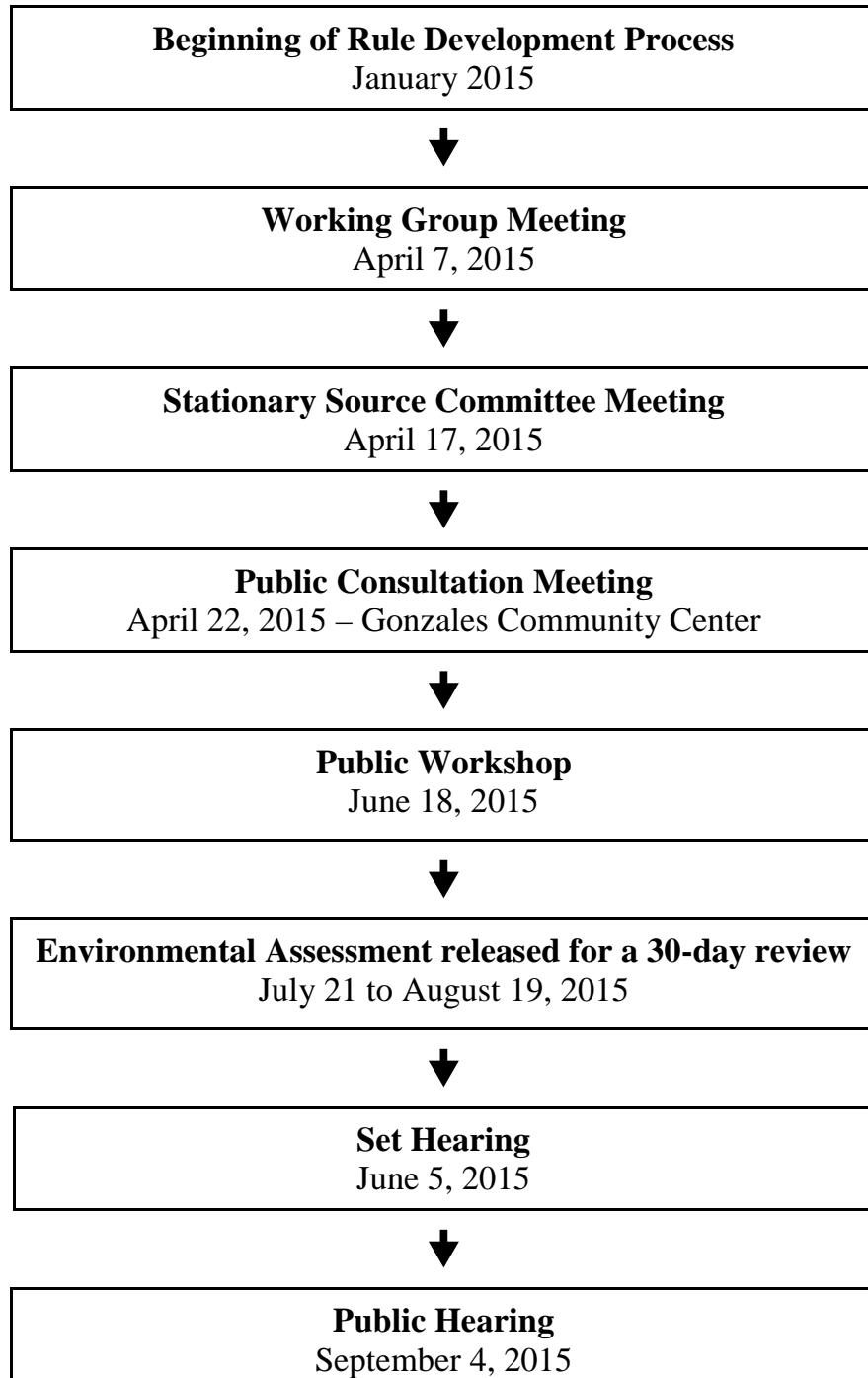
- Rule purpose and applicability are updated to clarify applicability of the rule after facility closure;
- Criteria for facility closure relative to cement manufacturing operation: activities must be completely ceased (i.e., blending silo, kiln, clinker cooler, and clinker grinding/milling) and related permits must be surrendered or have expired and are no longer reinstatable;
- Condition for reducing Cr<sup>+6</sup> ambient monitoring stations at existing cement facilities:
  - Approval for reduced number of monitoring stations (minimum of one) may be obtained upon subsequent 12 consecutive months of demonstrating less than Cr<sup>+6</sup> threshold (0.70 ng/m<sup>3</sup> and/or 0.20 ng/m<sup>3</sup>, excluding background, depending on the compliance date) after date of rule amendment;
  - Reversion to the most recently approved compliance monitoring plan within 14 calendar days of being notified by the SCAQMD of confirmed exceedances of the applicable threshold, considering wind and other relevant data;
- Effective September 5, 2016, ambient Cr<sup>+6</sup> concentrations from a 30-day or 90-day rolling average at each monitoring station shall not exceed 0.20 ng/m<sup>3</sup> (excluding background). Prior to this date, the previous Cr<sup>+6</sup> threshold of 0.70 ng/m<sup>3</sup> (excluding background) remains in effect;
- Within 60 days from notification of a confirmed exceedance of 0.20 ng/m<sup>3</sup> (excluding background) that occurs prior to September 5, 2018, but after September 5, 2016, a compliance plan with detailed descriptions of all feasible mitigations measures must be submitted for approval in addition to the appropriate fees. Failure to obtain an approved compliance plan is a violation of Rule 1156;
- The compliance plan requirement will not apply to owner/operator who has an approved, or has been required to submit, a Health Risk Assessment under Rule 1402 – Control of Toxic Air Contaminants for Existing Sources;
- A confirmed Cr<sup>+6</sup> exceedance of 0.20 ng/m<sup>3</sup> (excluding background) that occurs on or after September 5, 2018 will be a violation of the rule;
- Criteria to validate duplicate source tests:
  - PM10 concentrations of both samples must be below 0.002 grain/dscf; or
  - The difference between two samples shall be less than 35% of their average and the difference between the sample catches (normalized to the average sampling volume) shall be less than 3.5 milligrams;

- Requirements after facility closure:
    - Continued Cr+6 ambient monitoring in compliance with the applicable thresholds and compliance plan, inclusive of reduction to a minimum of one monitoring station;
    - The facility closure provisions no longer apply if both (1) and (2) occur:
      - (1) Completed implementation of an approved reclamation plan by the lead agency; or completed clean-up/rehabilitation of the property with all permanent stabilization measures done in compliance with SCAQMD Rules, including SCAQMD Rule 403 – Fugitive Dust during equipment dismantling or demolition and material removal; or determination from the Executive Officer that no further action is required or the reclamation/clean-up/rehabilitation activities have been satisfactorily completed; and
      - (2) Subsequent three months of demonstrated compliance with the applicable Cr<sup>+6</sup> ambient monitoring thresholds after completion of reclamation/clean-up/rehabilitation or no further action determination.
- A site-specific assessment may be submitted for approval so that areas that are not potentially contaminated can be excluded from the reclamation/clean-up/rehabilitation activities.

## ATTACHMENT B

### Rule Development Process

#### Proposed Amended Rule 1156 - Further Reductions of Particulate Emissions from Cement Manufacturing Facilities



Eight (8) months spent in rule development.

## **ATTACHMENT C**

### **Key Contacts List**

#### **Proposed Amended Rule 1156 - Further Reductions of Particulate Emissions from Cement Manufacturing Facilities**

California Portland Cement Company

Riverside Cement Company

Coleman Law

E4 Strategic Solutions

Department of Toxic Substances Control

Santa Ana Regional Water Quality Control Board

**ATTACHMENT D**

RESOLUTION NO. 15-\_\_\_\_\_

**A Resolution of the SCAQMD Governing Board certifying the Final Environmental Assessment for Proposed Amended Rule 1156 – Further Reductions of Particulate Emissions from Cement Manufacturing Facilities.**

**A Resolution of the South Coast Air Quality Management District (SCAQMD) Governing Board amending Rule 1156 – Further Reductions of Particulate Emissions from Cement Manufacturing Facilities.**

**WHEREAS**, the SCAQMD Governing Board finds and determines that the proposed amendments to Rule 1156 are considered a "project" pursuant to the California Environmental Quality Act (CEQA); and that the proposed project would not have a significant adverse effect on the environment; and

**WHEREAS**, the SCAQMD has had its regulatory program certified pursuant to Public Resources Code § 21080.5 and has conducted CEQA review and analysis pursuant to such program (SCAQMD Rule 110); and

**WHEREAS**, SCAQMD staff has prepared a Draft Environmental Assessment (EA) pursuant to its certified regulatory program and pursuant to CEQA Guidelines §15252, setting forth the potential environmental consequences of Proposed Amended Rule 1156 – Further Reductions of Particulate Emissions from Cement Manufacturing Facilities; and

**WHEREAS**, the Draft EA was circulated for 30-day public review and comment period from July 21, 2015 to August 19, 2015; and

**WHEREAS**, no comment letters were received during the comment period relative to the analysis presented in the Draft EA and the Draft EA has been revised such that it is now a Final EA; and

**WHEREAS**, it is necessary that the adequacy of the Final EA be determined by the SCAQMD Governing Board prior to its certification; and

**WHEREAS**, a Mitigation Monitoring Plan pursuant to Public Resources Code §21081.6 has not been prepared since no mitigation measures are necessary; and

**WHEREAS**, the SCAQMD Governing Board voting on Proposed Amended Rule 1156 – Further Reductions of Particulate Emissions from Cement Manufacturing Facilities has reviewed and considered the Final EA prior to its certification; and

**WHEREAS**, hexavalent chromium has been identified as a toxic air contaminant by the Office of Health Hazard Assessment (OEHHA); and

**WHEREAS**, California Health and Safety Code §40727 requires that prior to adopting, amending or repealing a rule or regulation, the SCAQMD Governing Board

shall make findings of necessity, authority, clarity, consistency, non-duplication, and reference based on relevant information presented at the public hearing and in the staff report; and

**WHEREAS**, the SCAQMD Governing Board has determined that a need exists to amend Rule 1156, to revise the hexavalent chromium (Cr<sup>+6</sup>) fence-line ambient monitoring threshold to reflect updated risk assessment procedures by the California Office of Health Hazard Assessment; to require continued Cr<sup>+6</sup> monitoring after facility closure before and during site clean-up or reclamation activities; and to set conditions for reducing the number of Cr<sup>+6</sup> monitoring stations and to sunset monitoring upon meeting specified criteria. Additional amendments are also proposed to improve rule clarity and effectiveness; and

**WHEREAS**, the SCAQMD Governing Board obtains its authority to adopt, amend or repeal rules and regulations from California Health and Safety Code §§ 39002, 39650 et seq., 40000, 40001, 40702, 40725 through 40728, 41508, and 41700; and

**WHEREAS**, the SCAQMD Governing Board has determined that Proposed Amended Rule 1156 is written or displayed so that its meaning can be easily understood by the persons directly affected by it; and

**WHEREAS**, the SCAQMD Governing Board has determined that Proposed Amended Rule 1156 is in harmony with, and not in conflict with or contradictory to, existing federal or state statutes, court decisions, or state or federal regulations; and

**WHEREAS**, the SCAQMD Governing Board has determined that Proposed Amended Rule 1156 does not impose the same requirements as any existing state or federal regulations and the proposed amendments are necessary and proper to execute the powers and duties granted to, and imposed upon, the SCAQMD; and

**WHEREAS**, the SCAQMD Governing Board has determined that Proposed Amended Rule 1156 references the following statutes which the SCAQMD hereby implements, interprets or makes specific: Health and Safety Code §§40001(b) (rules to prevent and abate air pollution episodes), 40702 (rules to execute duties as required by law) and 41700 (nuisance); and

**WHEREAS**, Health and Safety Code §40727.2 requires the SCAQMD to prepare a written analysis of existing federal air pollution control requirements applicable to the same source type being regulated whenever it adopts, or amends a rule, and that the SCAQMD's comparative analysis of Proposed Amended Rule 1156 is included in the staff report; and

**WHEREAS**, the SCAQMD Governing Board has determined that the Socioeconomic Impact Assessment of Proposed Amended Rule 1156 is consistent with the March 17, 1989 and October 14, 1994 Governing Board Socioeconomic Resolutions for rule adoption; and

**WHEREAS**, the SCAQMD Governing Board has determined that Proposed Amended Rule 1156 may reduce monitoring costs for both facilities and may potentially result in increased costs to one cement manufacturing facility, yet are considered to be reasonable, with the total compliance costs and potential cost-savings accruable to all affected facilities as specified in the Socioeconomic Impact Assessment; and

**WHEREAS**, the SCAQMD Governing Board has determined that the Socioeconomic Impact Assessment is consistent with the provisions of the California Health and Safety Code §§40440.8 and 40728.5; and

**WHEREAS**, Proposed Amended Rule 1156 is not a control measure in the 2012 Air Quality Management Plan (AQMP) and thus, was not ranked by cost-effectiveness relative to other AQMP control measures in the 2012 AQMP; and

**WHEREAS**, a public hearing has been properly noticed in accordance with the provisions of Health and Safety Code §40725; and

**WHEREAS**, the SCAQMD Governing Board has held a public hearing in accordance with all provisions of law; and

**WHEREAS**, the SCAQMD Governing Board specifies the manager of Proposed Amended Rule 1156 as the custodian of the documents or other materials which constitute the record of proceedings upon which the adoption of these proposed amendments are based, which are located at the South Coast Air Quality Management District, 21865 Copley Drive, Diamond Bar, California; and

**WHEREAS**, the SCAQMD Governing Board finds and determines, taking into consideration the factors in section (d)(4)(D) of the Governing Board Procedures (codified as Section 30.5(4)(D) of the Administrative Code), that the modifications made to Proposed Amended Rule 1156 since the notice of public hearing was published do not significantly change the meaning of the proposed amended rule within the meaning of Health and Safety Code §40726 and would not constitute significant new information requiring recirculation of the Draft CEQA document pursuant to CEQA Guidelines § 15088.5; and

**WHEREAS**, the SCAQMD Governing Board has determined that Proposed Amended Rule 1156, should be adopted for the reasons contained in the Final Staff Report; and

**WHEREAS**, the proposed amendments to Rule 1156 will not be submitted for inclusion into the State Implementation Plan.

**NOW, THEREFORE, BE IT RESOLVED**, that the SCAQMD Governing Board does hereby certify that the Final EA for Proposed Amended Rule 1156 – Further Reductions of Particulate Emissions from Cement Manufacturing Facilities was completed in compliance with CEQA and Rule 110 provisions; and that the Final EA was presented to the SCAQMD Governing Board, whose members reviewed,



considered and approved the information therein prior to acting on Proposed Amended Rule 1156; and

**BE IT FURTHER RESOLVED**, that because no significant adverse environmental impacts were identified as a result of implementing Proposed Amended Rule 1156 – Further Reductions of Particulate Emissions from Cement Manufacturing Facilities, a Statement of Findings, a Statement of Overriding Considerations, and a Mitigation Monitoring Plan are not required; and

**BE IT FURTHER RESOLVED**, that the SCAQMD Governing Board does hereby adopt, pursuant to the authority granted by law, Proposed Amended Rule 1156 – Further Reductions of Particulate Emissions from Cement Manufacturing Facilities, as set forth in the attached and incorporated herein by reference.

DATE: \_\_\_\_\_

\_\_\_\_\_  
CLERK OF THE BOARDS

## ATTACHMENT E

(Adopted November 4, 2005)(Amended March 6, 2009)  
(Amended September 4, 2015)

### **PROPOSED AMENDED RULE 1156. FURTHER REDUCTIONS OF PARTICULATE EMISSIONS FROM CEMENT MANUFACTURING FACILITIES**

(a) Purpose

The purpose of this rule is to further reduce particulate matter (PM) emissions and minimize hexavalent chromium emissions from cement manufacturing ~~facilities operations and the property after facility closure.~~

(b) Applicability

This rule applies to all operations, materials handling, and transport at a cement manufacturing facility, including, but not limited to, kiln and clinker cooler, material storage, crushing, drying, screening, milling, conveying, bulk loading and unloading systems, internal roadways, material transport, and track-out. After facility closure, this rule also applies to the owner/operator of the property on which a cement manufacturing facility has operated on or after November 4, 2005.

(c) Definitions

- (1) BAG LEAK DETECTION SYSTEM (BLDS) means a system that meets the minimum requirements specified under U.S. EPA 40 CFR Part 63, Subpart LLL, Section 1350 (m) to continuously monitor bag leakage and failure.
- (2) CEMENT MANUFACTURING FACILITY means any facility that engages in; ~~or has been engaged in prior to November 4, 2005,~~ the operation of producing portland cement or associated products, as defined in the Standard Industrial Classification Manual as Industry No. 3241, Portland Cement Manufacturing.
- (3) CHEMICAL DUST SUPPRESSANT means any non-toxic chemical stabilizer which is used as a treatment material to reduce fugitive dust emissions and its use is not prohibited by any other applicable law and meets all applicable specifications required by any federal, state, or local water agency.
- (4) CLINKER means a product from the kiln which is used as a feedstock to make cement.
- (5) CLINKER COOLER means equipment into which clinker product leaving the kiln is placed to be cooled by air supplied by a forced draft or natural draft supply system.

- (6) CONVEYING SYSTEM means a device for transporting materials from one piece of equipment or location to another piece of equipment or location within a facility. Conveying systems include, but are not limited to, the following: feeders, belt conveyors, bucket elevators and pneumatic systems.
- (7) CONTINUOUS OPACITY MONITORING SYSTEM (COMS) means a system that meets minimum requirements specified under U.S. EPA 40 CFR Part 60, Appendix B, to continuously monitor opacity.
- (8) CONVEYING SYSTEM TRANSFER POINT means a point where any material including, but not limited to, feed material, fuel, clinker or product, is transferred to or from a conveying system, or between separate parts of a conveying system.
- (9) COVERED CONVEYOR is a conveyor where the top and side portion of the conveyor are covered by a removable cover to allow routine inspection and maintenance.
- (10) DUST SUPPRESSANTS are water, hygroscopic materials, or chemical stabilizers used as a treatment material to reduce fugitive dust emissions.
- (11) ENCLOSED CONVEYOR is any conveyor where the top, side and bottom portion of the conveyor system is enclosed except for points of loading and discharge and except for a removable cover to allow routine inspection and maintenance.
- (12) ENCLOSED SCREENING EQUIPMENT means screening equipment where the top portion of the equipment is enclosed, except for the area where the materials are loaded to the screening equipment.
- (13) ENCLOSED STORAGE PILE means any storage pile that is completely enclosed in a building or structure consisting of a solid roof and walls.
- (14) END OF WORK DAY means the end of a working period that may include one or more work shifts, but no later than 8 p.m.
- (15) EXISTING EQUIPMENT means any equipment, process or operation having an existing valid ~~AQMD~~ SCAQMD permit that was issued prior to November 4, 2005.
- (16) FACILITY means any source or group of sources or other air contaminant-emitting activities which are subject to this rule and are located on one or more contiguous properties within the ~~AQMD~~ SCAQMD, in actual physical contact or separated solely by a public roadway or other public right-of-way, and are owned or operated by the same person (or by persons under common control), or an outer continental shelf (OCS) source as determined in 40 CFR Section 55.2. Such above-described groups, if noncontiguous, but connected only by land carrying a

pipeline, shall not be considered one facility. Sources or installations involved in crude oil and gas production in Southern California Coastal or OCS Waters and transport of such crude oil and gas in Southern California Coastal or OCS Waters shall be included in the same facility which is under the same ownership or use entitlement as the crude oil and gas production facility on-shore.

(17) FACILITY CLOSURE occurs when all cement manufacturing operations at the facility have completely ceased and all permits associated with on-site cement manufacturing operations, such as blending silos, kilns, clinker cooler, and clinker grinding/milling, are surrendered or have expired and are no longer reinstatable.

~~(18)~~(17) FINISH MILL means a roll crusher, ball and tube mill or other size reduction equipment used to grind clinker to a fine powder. Gypsum and other materials may be added to and blended with clinker in a finish mill. The finish mill also includes the air separator associated with the finish mill.

~~(19)~~(18) HAUL TRUCK means a diesel heavy-duty truck that has a loading capacity equal to or greater than 50 tons.

~~(20)~~(19) INACTIVE CLINKER PILE is a pile of clinker material that has not been disturbed, removed, and/or added to as a result of loading, unloading, and/or transferring activities for 30 (thirty) consecutive days.

~~(21)~~(20) KILN means a device, including any associated preheater or precalciner devices that produce clinker by heating limestone and other materials for subsequent production of portland cement.

~~(22)~~(21) OPEN STORAGE PILE is any accumulation of materials which attains a height of three (3) feet or more or a total surface area of one hundred fifty (150) square feet or more. The open pile is defined as inactive when loading and unloading has not occurred in the previous 30 consecutive days.

~~(23)~~(22) OWNER/OPERATOR means the owner and/or operator of the cement manufacturing facility subject to this rule unless otherwise specified or, upon facility closure, the owner and/or operator of the property where a cement manufacturing facility operated on or after November 4, 2005.

~~(24)~~(23) PAVED ROAD means a road improved by covering with concrete, asphaltic concrete, recycled asphalt, or asphalt.

~~(25)~~(24) RAW MILL means a ball, tube, or vertical roller mill or other size reduction equipment used to grind materials to the appropriate size. Moisture may be added or removed from the materials during the grinding operation. A raw mill may also include a raw material dryer and/or air separator.

~~(26)~~(25) ROAD means any route with evidence of repeated prior travel by vehicles.

- ~~(27)~~(26) STABILIZED SURFACE means any previously disturbed surface area or open storage pile which, through the application of dust suppressants, shows visual or other evidence of surface crusting, is resistant to being the source of wind-driven fugitive dust, and is demonstrated to be stabilized by the applicable test methods contained in the Rule 403 Implementation Handbook.
- ~~(28)~~(27) STREET SWEEPER is a PM<sub>10</sub> efficient street sweeper approved pursuant to Rule 1186 – PM<sub>10</sub> Emissions from Paved and Unpaved Roads & Livestock Operations.
- ~~(29)~~(28) TOP PROCESS PARTICULATE EMITTERS means:
- (A) process equipment, including but not limited to the kiln, clinker cooler, raw mill, and finish mill, vented to air pollution control equipment, except open-top baghouses, that account for 60% of the total process particulate emissions at the facility, for the requirement of using BLDS or COMS under paragraph (e)(2); or
  - (B) process equipment, including but not limited to the kiln, clinker cooler, raw mill, and finish mill, vented to air pollution control equipment, that account for 80% of the total process particulate emissions at the facility for the monitoring, source testing and recordkeeping requirements under paragraph (e)(3), (e)(8) and subparagraph (f)(2)(D).
- ~~(30)~~(29) TRACK-OUT means any material that adheres to and agglomerates on the exterior surface of motor vehicles, haul trucks, and equipment (including tires) that has been released onto a paved road and can be removed by a vacuum sweeper or a broom sweeper under normal operating conditions.
- ~~(31)~~(30) VERIFIED FILTRATION PRODUCT means filtration products that are verified under the U.S. EPA Environmental Technology Verification program (ETV).
- ~~(32)~~(31) WET SUPPRESSION SYSTEM means a system that supplies ultra-fine droplets of water or chemical dust suppressant by atomization through means of using compressed air or applying high pressure as specified by manufacturers to minimize dust.
- ~~(33)~~(32) WIND-DRIVEN FUGITIVE DUST means particulate matter emissions from any disturbed surface area which is generated by wind action alone.
- ~~(34)~~(33) WIND FENCE means a system consisting of a stand alone structure supporting a wind fence fabric. The wind fence fabric shall have maximum porosity of 20%.

## (d) Requirements

The owner/operator of a cement manufacturing facility shall comply with the following requirements unless otherwise stated.

## (1) Visible Emissions

- (A) The operator of a facility shall not cause or allow the discharge into the atmosphere of visible emissions exceeding 10 percent opacity based on an average of 12 consecutive readings from any operation at the facility, except open piles, roadways and unpaved areas, using EPA Opacity Test Method 9.
- (B) For open piles, roadways and other unpaved areas, the owner/operator of a facility shall not cause or allow the discharge into the atmosphere of visible emissions exceeding 20 percent opacity based on an average of 12 consecutive readings; or 50 percent opacity based on 5 individual consecutive readings using SCAQMD Opacity Test Method 9B.
- (C) The ~~operator~~ owner/operator of a facility shall not cause or allow any visible dust plume from exceeding 100 feet in any direction from any operations at the facility.

## (2) Loading, Unloading, and Transferring

- (A) The ~~operator~~ owner/operator shall conduct material loading and unloading to and from trucks, railcars, or other modes of material transportation through an enclosed system that is vented to SCAQMD permitted air pollution control equipment that meets the requirements in paragraph (d)(6) and subparagraph (d)(1)(A) and is operated during loading and unloading activities. In the event the system consists of a building, the enclosed building shall have openings with overlapping flaps, sliding doors or other equally effective devices, as approved by the Executive Officer to meet the requirement in subparagraph (d)(1)(A), which shall remain closed, except to allow trucks and railcars to enter and leave.
- (B) The owner/operator shall cover or enclose all conveying systems and enclose all transfer points. During all conveying activities, the enclosed transfer points and enclosed conveying systems shall be vented to a permitted air pollution control device that meets the requirements in subparagraph (d)(1)(A) and paragraph (d)(6) and is operated during all conveying activities. The enclosure shall have access doors to allow routine inspection and maintenance.

- (C) The owner/operator shall apply dust suppressants as necessary during material loading, unloading, and transferring activities, and at conveying system transfer points to dampen and stabilize the materials transported and prevent visible dust emissions generated to meet the requirement in subparagraph (d)(1)(A).
  - (D) The owner/operator shall install and maintain as necessary dust curtains, shrouds, belt scrapers, and gaskets along the belt conveying system to contain dust, prevent spillage and carryback in order to minimize visible emissions.
  - (E) The owner/operator shall use appropriate equipment including, but not limited to, stackers or chutes, as necessary, to minimize the height from which materials fall into storage bins, silos, hoppers or open stock piles and reduce the amount of dust generated to meet the requirements in paragraphs (d)(1) and (d)(6).
- (3) Crushing, Screening, Milling, Grinding, Blending, Drying, Heating, Mixing, Sacking, Palletizing, Packaging, and Other Related Operations
- (A) The owner/operator shall enclose crushing, screening, milling, grinding, blending, drying, heating, mixing, sacking, palletizing, packaging and other related operations. The enclosed system shall be vented to permitted control equipment that meets the requirements in paragraph (d)(6) and subparagraph (d)(1)(A). The control equipment shall be operated during these operations.
  - (B) In lieu of the configuration described in subparagraph (d)(3)(A), the owner/operator of a primary crusher installed and operated prior to November 4, 2005 may use wind fences on at least two sides of the primary crusher with one side facing the prevailing winds. The structure shall be equipped and operated with a wet suppression system. To implement this, the owner/operator shall submit a permit modification application by May 4, 2006 for a primary crusher to enable the Executive Officer to develop permit conditions to ensure that this air pollution control system is designed and operated to minimize particulate emissions.
  - (C) The owner/operator shall apply dust suppressants, as necessary, during all operations to dampen and stabilize the materials processed and prevent visible emissions generated to meet the requirements in subparagraph (d)(1)(A).

- (4) Kilns and Clinker Coolers  
The owner/operator shall not operate the kilns and clinker coolers unless the kilns and clinker coolers are vented to air pollution control equipment that meets the requirements in paragraph (d)(6) and subparagraph (d)(1)(A).
- (5) Material Storage
- (A) An owner/operator that stores raw materials and products in a silo, bin or hopper shall vent the silo, bin or hopper to an air pollution control device that meets the requirements in subparagraph (d)(1)(A) and paragraph (d)(6).
- (B) No later than September 8, 2009, the owner/operator shall conduct all clinker material storage and handling in an enclosed storage area that meets the requirements in subparagraph (d)(1)(A) and paragraph (d)(6). The enclosed storage area shall have opening(s) covered with overlapping flaps, and sliding door(s) or other equivalent device(s) approved by the Executive Officer, which shall remain closed at all times, except to allow vehicles to enter or exit. Prior to the completion and operation of the enclosure, all clinker materials shall be stored and handled in the same manner as non-clinker materials as set forth in subparagraph (d)(5)(D).
- (C) If clinker material storage and handling activities occur more than 1,000 feet from, and inside, the facility property-line, the owner/operator may comply with all of the following in lieu of the requirements of subparagraph (d)(5)(B) no later than September 8, 2009:
- (i) Utilize a three-sided barrier with roof, provided the open side is covered with a wind fence material of a maximum 20% porosity, allowing a removable opening for vehicle access. The removable wind fence for vehicle access may be removed only during minor or routine maintenance activities, the creation or reclamation of outside storage piles, the importation of clinker from outside the facility, and reclamation of plant clean-up materials. The removable opening shall be less than 50% of the total surface area the wind fence and the amount of time shall be minimized to the extent feasible;
- (ii) Storage and handling of material that is immediately adjacent to the three-sided barrier due to space limitations inside the structure shall be contained within an area next to the structure with a wind fence on at least two sides, with at least a 5 foot freeboard above



- the top of the storage pile to provide wind sheltering, and shall be completely covered with an impervious tarp, revealing only the active disturbed portion during material loading and unloading activities;
- (iii) Storage and handling of other active clinker material shall be conducted within an area surrounded on three sides by a barrier or wind fences with one side of the wind fence facing the prevailing wind and at least a 5-foot freeboard above the top of the storage pile to provide wind sheltering. The clinker shall remain completely covered at all times with an impervious tarp, revealing only the active disturbed portion during material loading and unloading activities. The barrier or wind fence shall extend at least 20 feet beyond the active portion of the material at all times; and
  - (iv) Inactive clinker material may be alternatively stored using a continuous and impervious tarp, covered at all times, provided records are kept demonstrating the inactive status of such stored material.
- (D) For active open non-clinker material storage and handling, the owner/operator shall comply with one of the following to meet the requirements of subparagraphs (d)(1)(B) and (d)(1)(C):
- (i) Apply chemical dust suppressants to stabilize the entire surface area of the pile, except for areas of the pile that are actively disturbed during loading and unloading activities; or
  - (ii) Install and maintain a three-sided barrier or wind fences with one side facing the prevailing winds and with at least two feet of visible freeboard from the top of the storage pile to provide wind sheltering, maintain surface stabilization of the entire pile in a manner that meets the performance standards of subparagraphs (d)(1)(B) and (d)(1)(C), and store the materials completely inside the three-sided structure at all times; or
  - (iii) Install and maintain a three-sided barrier with roof, or wind fences with roof, to provide wind sheltering; maintain the open-side of the storage pile stabilized in a manner that meets the performance standards of subparagraphs (d)(1)(B) and (d)(1)(C), and store the materials completely inside the three-sided structure at all times; or
  - (iv) Install and maintain a tarp over the entire surface area of the storage pile, in a manner that meets the performance standards of

subparagraphs (d)(1)(B) and (d)(1)(C), except for areas of the pile that are actively disturbed during loading and unloading activities.

The tarp shall remain in place and provide cover at all times.

- (E) All inactive non-clinker piles shall be stored and handled in the same manner as non-clinker materials, as set forth in subparagraph (d)(5)(D). The owner/operator shall keep records demonstrating the inactive status of the non-clinker piles.
  - (F) For open storage piles subject to subparagraph (d)(5)(D), the owner/operator shall apply chemical dust suppressants or dust suppressants during any material loading and unloading to/from the open piles; and re-apply chemical dust suppressants or dust suppressants to stabilize the disturbed surface areas of the open piles at the end of each work day in which loading and unloading activities were performed to meet the performance standards of subparagraphs (d)(1)(B) and (d)(1)(C) .
- (6) Air Pollution Control Device
- (A) The owner/operator shall install and maintain an air pollution control system referred to in paragraphs (d)(2), (d)(3), (d)(4) and (d)(5) to meet the following performance standards measured with the approved source test in subdivision (g):
    - (i) an outlet concentration of 0.01 grain PM per dry standard cubic feet for equipment installed prior to November 4, 2005; and
    - (ii) a BACT outlet concentration not to exceed 0.005 grain PM per dry standard cubic feet for equipment installed on and after November 4, 2005.
  - (B) The owner/operator shall install and maintain a baghouse ventilation and hood system that meets a minimum capture velocity requirement specified in the applicable standards of the U.S. Industrial Ventilation Handbook, American Conference of Governmental Industrial Hygienists, at the time of installation. If modification to the baghouse ventilation and hood system is required to meet the applicable standard, the owner/operator shall be granted additional time up to December 31, 2006 to complete this process.
  - (C) The owner/operator shall meet the requirements in paragraph (d)(6) by December 31, 2006 for pulse-jet baghouses, and by December 31, 2010 for non-pulse-jet baghouses.

- (D) To show incremental progress towards the December 31, 2010 compliance date for non-pulse-jet baghouses, the owner/operator shall submit to the Executive Officer a list of baghouse candidates for future modification or replacement by December 31, 2006. In addition, the owner/operator shall submit a notification letter by December 31 of each year thereafter, starting in 2006, to demonstrate that the owner/operator has completed at least 20% of the modification or replacement by 2006; 40% by 2007; 60% by 2008, 80% by 2009; and 100% by 2010.
- (7) Internal Roadways and Areas
- (A) Unpaved Roadways and Areas
- (i) For haul roads used by haul trucks to carry materials from the quarry to different locations within the facility, the owner/operator shall apply chemical dust suppressants in sufficient quantity and at least twice a year to stabilize the entire unpaved haul road surface; post signs at the two ends stating that haul trucks shall use these roads unless traveling to the maintenance areas; and enforce the speed limit of 35 miles per hour or less to comply with the opacity limits in paragraph (d)(1).
- (ii) For other unpaved roadways and areas, the owner/operator shall apply chemical dust suppressants in sufficient quantity and at least twice a year to stabilize the surface, or apply gravel pad containing 1-inch or larger washed gravel to a depth of six inches; and enforce a speed limit of 15 miles per hour or less to comply with the opacity limits in paragraph (d)(1).
- (B) Paved Roads
- The owner/operator shall sweep all internal paved roads at least once each regular work day or more frequently if necessary to comply with the opacity limits in paragraph (d)(1). Sweeping frequency may be reduced on weekends, holidays, or days of measurable precipitation provided that the owner/operator complies with the opacity limits in paragraph (d)(1) at all times. Sweepers purchased or leased after November 4, 2005 shall be Rule 1186-certified sweepers.
- (8) Track-Out
- (A) The owner/operator shall pave the closest 0.25 miles of internal roads leading to the public roadways and ensure that all trucks use these roads

- exclusively when leaving the facility to prevent track-out of dust to the public roadways and to comply with the opacity limits in paragraph (d)(1).
- (B) If necessary to comply with the opacity limits in paragraph (d)(1), the owner/operator shall install a rumble grate, truck washer, or wheel washer; and ensure that all trucks go through the rumble grate, truck washer or wheel washer such that the entire circumference of each wheel or truck is cleaned before leaving the facility.
- (C) To prevent material spillage from trucks to public roadways and fugitive dust emissions during transport, a truck driver on the facility shall ensure that the cement truck hatches are closed and there is no track-out, and the owner/operator shall provide truck cleaning facilities on-site.
- (D) The owner/operator shall provide, at least once each calendar year, the “Fugitive Dust Advisory” flyers prepared by the District to any company doing business with the facility and which is subject to the requirements in subparagraph (d)(8)(C).
- (9) No Backsliding  
To prevent any backsliding from the current level of control, the owner/operator shall operate and maintain all existing equipment according to permit conditions stated in the permits approved by the Executive Officer prior to November 4, 2005 at all times.
- (10) Compliance Monitoring Plan
- (A) No later than June 8, 2009, the owner/operator shall submit to the Executive Officer a complete compliance plan for wind monitoring and the monitoring, sampling, and analysis of hexavalent chromium, and pay a plan evaluation fee pursuant to Rule 306 – Plan Fees. The submitted plan will be disapproved if it does not meet the provisions of subparagraph (d)(10)(B). The owner/operator shall resubmit an approvable plan within 30 days from date of disapproval; otherwise, the owner/operator shall be deemed in violation of this provision.
- (B) The monitoring plan submitted shall contain, at a minimum, the following:
- (i) Siting and monitoring protocols that comply with EPA’s and CARB’s guidance and/or protocols for measurement of hexavalent chromium, wind direction, and wind speed. A minimum of three fence-line monitoring stations are required for hexavalent chromium: one upwind and one downwind of the facility under the common prevailing wind directions, and one subject to approval by

- the Executive Officer to ensure maximum effectiveness of the monitoring to the most potentially affected receptor, such as nearest residential or business receptors relative to clinker storage areas or potential hexavalent chromium emitting sources.
- (ii) Breakdown provisions which include: (1) a statement that the owner/operator will notify the Executive Officer in writing of the breakdown within 24 hours of its occurrence. If the breakdown occurs on a Friday, over a weekend, or on a national or state holiday observed by the facility, the facility shall report such breakdown on the following work day; (2) a repair schedule; and (3) an action plan with detailed measures to be taken by the owner/operator to ensure that there will be at least 70% data capture at each site by each monitoring system;
  - (iii) Consent from the owner/operator that allows the Executive Officer to conduct any co-located or audit sampling at any time;
  - (iv) Sampling analysis protocols that comply with EPA and CARB's appropriate guidance and/or protocols for hexavalent chromium. All samples shall be analyzed at a District-approved laboratory, which can be audited at any time; and
  - (v) Any other relevant data and information required by the Executive Officer.
- (C) The Executive Officer shall approve or disapprove the complete plan within 60 days from the submittal date.
  - (D) The owner/operator may file for a compliance monitoring plan amendment in the future relative to monitor siting or other elements of the plan as more site-specific data becomes available.
- (11) Hexavalent Chromium Monitoring and Other Requirements
- (A) No later than six months from compliance plan approval or March 1, 2010, whichever occurs first, the owner/operator of a cement manufacturing facility shall conduct hexavalent chromium ambient air monitoring as follows:
    - ~~(A)~~(i) The owner/operator shall conduct ambient air monitoring for hexavalent chromium in accordance with the approved monitoring plan set forth in subparagraph (d)(10)(B) or (d)(10)(D), as applicable. The hexavalent chromium concentration from a 30-day rolling average at each monitoring station shall not exceed 0.70

nanograms per cubic meter (ng/m<sup>3</sup>), excluding background. 24-hour sampling shall be conducted once every third day according to the EPA 1-in-3-day sampling calendar. For monitoring sample retrieval in which collection occurs on a weekend or facility observed national or state holiday, the sample may be collected the following business day.

~~(B)~~(ii) The owner/operator may conduct 24-hour sampling once every six days for hexavalent chromium if there is no single exceedance of the 0.70 ng/m<sup>3</sup> level during 12 continuous months of monitoring. On this sampling schedule, the hexavalent chromium concentration from a 90-day rolling average at each monitoring station shall not exceed 0.70 ng/m<sup>3</sup>, excluding background. If there is an confirmed exceedance while on this sampling schedule, sampling shall ~~immediately~~ revert back to once every three days. For monitoring sample retrieval in which collection occurs on a weekend or facility observed national or state holiday, the sample may be collected the following business day. Reverting back to the more frequent sampling schedule stated in clause (d)(11)(A)(i) due to an exceedance of the threshold must occur within 14 calendar days after the Executive Officer gives notice to the facility confirming that, through wind event or other relevant data, as necessary, the facility is the source of the exceedance.

(iii) After (date of adoption) and upon a subsequent 12 consecutive months of demonstrating less than the hexavalent chromium thresholds in clauses (d)(11)(A)(i) or (ii) and/or subparagraph (d)(11)(B) as applicable, the owner/operator may submit for approval an amended compliance monitoring plan to operate a minimum of one monitoring station at a location in the predominantly downwind direction from the emission source(s). If the applicable thresholds in clauses (d)(11)(A)(i) or (ii) and/or subparagraph (d)(11)(B) are exceeded and the facility is confirmed to be the source of the exceedance, the owner/operator shall, within 14 calendar days of being so notified by the Executive Officer, revert back to the most recently approved compliance monitoring plan under subparagraph (d)(10).

(B) Effective September 5, 2016, the ambient hexavalent chromium concentration from a 30-day or 90-day rolling average, as applicable, at each monitoring station in subparagraph (d)(11)(A) shall not exceed 0.20

ng/m<sup>3</sup>, excluding background. All other provisions of subparagraph (d)(11)(A) shall continue to apply.

- (C) Upon any exceedance of 0.20 ng/m<sup>3</sup> (excluding background) that occurs prior to September 5, 2018, but after September 5, 2016, of which the cement manufacturing facility has been confirmed to be the source of the Cr<sup>+6</sup> exceedance, the owner/operator shall, within 60 days of notice by the Executive Officer, submit for approval a compliance plan and pay applicable fees pursuant to Rule 306 – Plan Fees. Failure to obtain an approved compliance plan is a violation of this rule.
- (D) The compliance plan shall include detailed descriptions of all feasible measures being utilized or that will be utilized to reduce hexavalent chromium emissions at the facility to demonstrate increments of progress as quickly as possible. The plan shall include, but not be limited to, the following information:
- (i) The name(s), address(es), and phone number(s) of the person(s) responsible for the preparation, submittal, and implementation of the plan;
  - (ii) A description of the activities, including a map depicting the location of the site, notating any defining landmarks or demarcations;
  - (iii) A listing of all potential sources of fugitive dust emissions within the property lines;
  - (iv) The owner/operator shall describe the implementation, including the application schedule/frequency of all applicable dust control measures listed in Rule 403 – Fugitive Dust;
  - (v) A description of additional control and/or stabilization measures that will be applied to each of the sources. The description must include the application frequency of the measures and must be sufficiently detailed to demonstrate that all feasible measures will be utilized.
- (E) The compliance plan requirement of subparagraph (d)(11)(C) will not apply to an owner/operator who currently has in place or has been required to submit a Health Risk Assessment under Rule 1402 – Control of Toxic Air Contaminants from Existing Sources, subdivision (d).
- (F) A confirmed hexavalent chromium exceedance of 0.20 ng/m<sup>3</sup> that occurs on or after September 5, 2018 will be a violation of this rule.

~~(C)~~(G) For facilities that elect to comply with (d)(5)(C), any exceedance of the concentrations listed in clauses (d)(11)(A) and/or (d)(11)(B) will require enclosure of all clinker materials storage and handling if the Executive Officer confirms, through wind event monitoring data, that the cement manufacturing facility is the source of violation. The facility operator may select one of the following enclosure schedule: 25% of the facility's five-year annual average clinker material stored and handled, by weight, no later than 12 months from the date of the exceedance; and an incremental 25% per subsequent year until completion; or complete the total enclosure within 24 months from the date of exceedance.

(12) Particulate Matter (PM10) Monitoring and Other Requirements

The owner/operator of the cement manufacturing facility who accrues three or more approved notices of violation for an exceedance of the upwind/downwind level specified in Rule 403 within a 36-month period shall conduct PM10 ambient air monitoring. An amendment to the compliance monitoring plan to include PM10 monitoring protocols and procedures shall be filed within 90 days of the date of the third approved notice of violation. The monitoring equipment shall be installed and operated within 6 months from the date of modified plan approval and no later than one year from the date of the third approved notice of violation.

(A) The owner/operator shall conduct continuous and real-time ambient air monitoring for PM10, using a continuous monitoring system, in accordance with a monitoring plan approved by the Executive Officer in a manner as set forth in subparagraphs (d)(10)(B) or (d)(10)(D), as applicable. The differences of PM10 concentrations from any two monitoring sites which represent upwind and downwind concentrations shall not exceed the amount and averaging time period specified in Rule 403.

(B) The owner/operator shall apply dust suppressants on all openly stored non-clinker materials, unpaved roads, and unpaved areas within the facility, as well as take steps to decrease clinker dust, if the PM10 difference(s) set forth in Rule 403 are exceeded at any time.

(13) Wind Monitoring

(A) No later than September 8, 2009, the owner/operator shall install and operate wind monitoring equipment to conduct hourly wind monitoring according to a protocol approved by the Executive Officer.

(B) On and after the date of operation of the wind monitoring equipment pursuant to subparagraph (d)(13)(A), the owner/operator shall cease all



open handling of clinker material for a two-hour period in the event that instantaneous wind speeds exceed 25 miles per hour (mph), and if such wind speeds subsequently exceed 25 mph, a new two-hour period shall begin. During the aforementioned two-hour period, the facility would be exempt from the requirement of subparagraph (d)(1)(C) if the open handling of clinker material is ceased, provided that dust controls as required by District rules are applied; and unpaved roads are stabilized upon register of the high wind event via the wind monitoring equipment.

(e) Monitoring and Source Testing at a Cement Manufacturing Facility

- (1) For the kilns and clinker coolers, the owner/operator shall continuously monitor and record operating parameters including, but not limited to, flue gas flow rates and pressure drops across the baghouses to monitor baghouse performance and ensure compliance with the opacity limit in subparagraph (d)(1)(A).
- (2) For all new baghouses greater than or equal to 10,000 actual cubic feet per minute, and for all existing baghouses of the top process particulate emitters as defined under subparagraph (c)(28)(A), the owner/operator shall install, operate, calibrate and maintain a COMS or BLDS to monitor baghouse performance and ensure compliance with the opacity limit in subparagraph (d)(1)(A).
- (3) The owner/operator operator shall conduct visible emission observations with EPA Method 22 for process equipment equipped with air pollution control equipment at the following frequency:
  - (i) Weekly for top process particulate emitters defined under subparagraph (c)(28)(B) that are not equipped with BLDS or COMS;
  - (ii) Monthly for top process particulate emitters defined under subparagraph (c)(28)(B) that are equipped with BLDS or COMS; and
  - (iii) Monthly for other process equipment.
- (4) The owner/operator shall monitor and record pertinent operating parameters, such as pressure drops, according to the Operation and Maintenance Procedure in paragraph (e)(12) to monitor the performance of air pollution control equipment and ensure compliance with the opacity limit in subparagraph (d)(1)(A).
- (5) If the owner/operator receives an alarm from the BLDS, or COMS, the owner/operator shall immediately conduct an EPA Method 22 test and implement all necessary corrective actions to minimize emissions.
- (6) If the owner/operator observes visible emissions during any EPA Method 22 test, the owner/operator shall immediately implement all necessary corrective actions

to minimize emissions, and conduct EPA Method 9 test within one hour of any observation of visible emissions.

- (7) For the kilns and clinker coolers, the owner/operator shall conduct an annual compliance source test in accordance with the test methods in subdivision (g) to demonstrate compliance with the emission limit(s) in subdivision (d). The first annual compliance source test in accordance with an approved source test protocol shall be conducted within ninety (90) calendar days after the compliance date specified in subdivision (d). The owner/operator shall submit a source test protocol to the Executive Officer no later than sixty (60) calendar days prior to the proposed test date for the Executive Officer's approval for the first compliance source test. The testing frequency may be reduced to once every 24 calendar months if the two most recent consecutive annual source tests demonstrate compliance with the limits. Upon notification by the Executive Officer, the testing frequency shall be reverted back to annual testing if any subsequent source test fails to demonstrate compliance with the limits. In lieu of annual testing, any owner/operator who elects to use all verified filtration products in its baghouses shall conduct a compliance test every five years.
- (8) By February 4, 2006, the owner/operator shall provide the Executive Officer a list of the top process particulate emitters as defined under subparagraph (c)(28)(B), and the proposed testing schedule for these equipment. The owner/operator shall conduct compliance source tests on representative baghouses within each process system and submit test results for these processes every 5 years, with at least two source tests conducted in any calendar year. If there are any changes to the list of equipment to be tested or the testing schedule, the owner/operator shall notify the Executive Officer 60 calendar days before the test date.
- (9) The owner/operator shall not be required to test non-operational equipment, which is not in operation for at least 6 consecutive months prior to scheduled testing, as indicated in paragraph (e)(8) provided that the owner/operator shall conduct such test within one month after resuming operation.
- (10) During any compliance source test, the owner/operator shall monitor and record, at a minimum, all operating data for the selected operating parameters of the control equipment and the process equipment and submit this data with the test report.
- (11) The owner/operator shall submit a complete test report for any compliance source test to the Executive Officer no later than sixty (60) calendar days of completion of the source test.

- (12) Operation and Maintenance Procedures
- (A) The owner/operator shall develop and implement an Operation and Maintenance Procedure to ensure that the performance of the air pollution control equipment is continuously maintained and operated. The Operation and Maintenance Procedure shall include, at a minimum, information on monitoring and recordkeeping procedures, routine maintenance procedures, corrective and preventive actions for the air pollution control equipment, and training related to EPA Method 22, EPA Opacity Test Method 9 and ~~AQMD~~SCAQMD Opacity Test Method 9B, and other applicable information to demonstrate compliance with this rule.
- (B) The owner/operator shall develop and implement an Operation and Maintenance Procedure that would require sufficient maintenance of internal roadways and areas, prompt cleanup of any pile of material spillage or carry-back, and application of chemical dust suppressant or other dust control methods to maintain surface stabilization of the open piles, spillage and carry-back to ensure compliance with the opacity standards in paragraph (d)(1) at all times.
- (C) The owner/operator shall develop and maintain the Operation and Maintenance Procedures described under subparagraphs (e)(12)(A) and (e)(12)(B) within 6 months after November 4, 2005, and shall make the Operation and Maintenance Procedures available to the Executive Officer upon request.
- (f) Reporting and Recordkeeping at a Cement Manufacturing Facility
- (1) The owner/operator shall maintain all records and information required to demonstrate compliance with the provisions of this rule in a manner approved by the Executive Officer for a period of at least five years which shall be made available to the Executive Officer upon request.
- (2) The owner/operator of a facility shall keep, at a minimum, the following records to demonstrate compliance:
- (A) Daily records of applying chemical dust suppressants, watering, sweeping and cleaning activities;
- (B) Appropriate records, on at least a monthly basis, for primary crushers, kilns, raw mills, and finish mills, production records of clinkers and cements and records of raw materials delivered to the facility in order to determine emissions;

- (C) Test reports to demonstrate compliance with the emission standards in subdivision (d) including, but not limited to, PM emission rates, and opacity readings;
  - (D) Records of equipment malfunction and repair for the air pollution control equipment of the top process particulate emitters specified under subparagraph (c)(28)(B);
  - (E) Daily records of all material handling, including loading and unloading, and storage pursuant to paragraphs (d)(2) and (d)(5);
  - (F) Monitoring data pursuant to subparagraphs (d)(11), and (d)(12) as applicable, and supporting documentation, including, but not limited to chains of custody and laboratory results;
  - (G) Hourly records of wind speed and direction pursuant to subparagraph (d)(13);
  - (H) Records of all maintenance activities pursuant to clause (d)(5)(C)(i) and paragraph (i~~h~~)(7), including any equipment testing after the repairs and duration of wind fence removal;
  - (I) Records of clinker pile reclamation, importation, and transport pursuant to clause (d)(5)(C)(i), including duration of wind fence removal; and
  - (J) Records of all vehicle traffic and monthly average road trips pursuant to paragraph (i~~h~~)(4).
- (3) Monitoring data shall be reported monthly to, and in an electronic format specified by, the Executive Officer. In the event the facility owner/operator finds that an exceedance of the levels specified in subparagraphs (d)(11)(A), (d)(11)(B), or (d)(12)(A) as applicable has occurred, the owner/operator shall report in writing such finding to the Executive Officer, and follow up with a phone call the next business day after such finding.
- (g) Test Methods and Calculation for a Cement Manufacturing Facility
- (1) The owner/operator shall use the following source test methods, as applicable, to determine the PM emission rates. All source test methods referenced below shall be the most recent version issued by the respective organization. All test results in units of grains/dscf shall be determined as before the addition of any dilution or air, if present, that was not a part of the stream(s) processed by the device that was tested.
    - (A) SCAQMD Source Test Method 1.1 or 1.2 – Velocity and Sample Traverse Points;

- (B) SCAQMD Source Test Method 2.1 or 2.3 – Stack Gas Flow Rate;
  - (C) SCAQMD Source Test Method 3.1 – Stack Gas Density;
  - (D) SCAQMD Source Test Method 4.1 – Stack Gas Moisture;
  - (E) SCAQMD Source Test Method 5.2 or 5.3 - Determination of Particulate Matter Emissions in which reagent grade acetone shall be used to recover samples from the components of the sampling train located before the particulate filter;
  - (F) EPA Source Test Method 5 with the impinger analysis may be used in lieu of SCAQMD Source Test Method 5.2 or 5.3.
  - (G) EPA Source Test Method 5D with the impinger analysis may be used to measure PM emissions from positive pressure fabric filters.
- (2) Measurement of particulate matter emissions from the cement kiln shall provide for a correction of sulfur dioxide emissions collected in the particulate matter samples. Any measured gaseous sulfur dioxide emissions shall be excluded from the measurement of particulate matter emissions by subtracting from the mass of material collected in any impingers a mass equivalent to the amount of measured sulfur dioxide emissions based upon sulfuric acid dihydrate as specified in SCAQMD Source Test Methods 5.2 or 5.3.
- (3) Source tests for PM shall be taken and the average of the samples shall be used to determine the applicable emission rate in accordance with the following requirements:
- (A) Simultaneous duplicate samples shall be obtained unless the owner/operator demonstrates to the satisfaction of the Executive Officer that it is not physically feasible to do so, in which case the owner/operator shall take sequential triplicate samples;
  - (B) All samples must have minimum sampling volume of 120 cubic feet or a minimum PM catch of 6 milligrams per sample shall be collected;
  - (C) For duplicate samples, the source test shall be deemed ~~invalid~~ valid if:
    - (i) both samples are below 0.002 grain/dscf; or
    - (ii) the difference between the two samples is ~~greater~~ less than 35% of the average of the two samples in the applicable units specified in subdivision (d) and if the difference between the sample catches normalized to the average sampling volume is ~~greater~~ less than 3.5 milligrams. If the source test is deemed invalid, the test shall be repeated; and

- (D) For triplicate samples, upon approval of the Executive Officer or designee, if the owner/operator can demonstrate that the process conditions including, but not limited to, the throughput, quantity, type, and quality of all feedstock to the equipment process, and the emission control equipment conditions have not changed throughout the sequential test period, then the owner/operator may apply the Dixon outlier test at the 95% significance level to check for and discard one outlier, and shall use the average of the two remaining samples to determine PM emissions.
- (4) The owner/operator may use alternative or equivalent source test methods, as defined in U.S. EPA 40 CFR 60.2, if they are approved in writing by the Executive Officer, the California Air Resources Board, and the U.S. Environmental Protection Agency.
- (5) The owner/operator shall use a test laboratory approved under the SCAQMD Laboratory Approval Program for the source test methods cited in this subdivision if such approved lab exists. If there is no approved laboratory, then approval of the testing procedures used by the laboratory shall be granted by the Executive Officer on a case-by-case basis based on appropriate SCAQMD protocols and procedures.
- (6) The owner/operator shall use the methods specified in the SCAQMD Rule 403 Implementation Handbook to determine threshold friction velocity and stabilized surface; and EPA Opacity Test Method 9 and Method 22, or SCAQMD Opacity Test Method 9B to determine opacity.
- (7) When more than one source test method or set of source test methods are specified for any testing, the application of these source test methods to a specific set of test conditions is subject to approval by the Executive Officer. In addition, a violation established by any one of the specified source test methods or set of source test methods shall constitute a violation of the rule.

(h) Requirements After Facility Closure

- (1) The requirements of this division (h) shall apply after facility closure to the owner/operator of the property on which a cement manufacturing facility operated on or after November 4, 2005, and these requirements shall cease to apply in accordance with paragraph (h)(5).
- (2) The owner/operator shall continue the applicable hexavalent chromium ambient monitoring pursuant to subparagraph (d)(11)(A) and/or (d)(11)(B), and shall

continue complying with the compliance plan pursuant to subparagraphs (d)(11)(C) through (E), as applicable.

- (3) In the event of any need to relocate an ambient hexavalent chromium monitor, the owner/operator shall notify the SCAQMD in writing and obtain Executive Officer approval prior to such relocation. The monitor(s) shall be moved back to the original location(s) or other approved locations(s) within the timeframe specified by the Executive Officer.
- (4) The owner/operator shall provide the SCAQMD with monitoring calibration and maintenance data upon request of the Executive Officer.
- (5) The requirements of subdivision (h) shall cease to apply when both subparagraphs (A) and (B) below are achieved:
- (A) One of the following occurs:
- (i) Reclamation is completed according to an approved reclamation plan by the lead agency; or
  - (ii) Completion of clean-up/rehabilitation of the property to minimize hexavalent chromium emissions via fugitive dust, including but not limited to:
    - (I) Compliance with SCAQMD Rule 403 – Fugitive Dust or other SCAQMD rules, as applicable, during the dismantling or demolition of cement manufacturing or related equipment and the removal of cementacious dust and other material build-up; and
    - (II) Complete and permanent stabilization of the property, including but not limited to paving and/or revegetation.

The owner/operator may submit a site-specific assessment using soil sampling, historic site activity, or other means, identifying areas determined not to be potentially contaminated by hexavalent chromium contamination. If approved by the Executive Officer, those areas determined not to be potentially contaminated may be excluded from the provisions of this clause (h)(5)(A)(ii); ~~and/or~~
  - (iii) The Executive Officer determines that either no further action is required or reclamation/clean-up/rehabilitation activities have been satisfactorily completed such that fugitive emissions of hexavalent chromium have been reduced and are no longer of public health concern; and

- (B) The owner/operator demonstrates compliance with the applicable hexavalent chromium threshold pursuant to subparagraph (d)(11)(A) and/or (d)(11)(B) for a subsequent 3 month period after completion of reclamation, clean-up/rehabilitation or no further action determination in subparagraph (h)(5)(A).
- (6) The owner/operator must notify the Executive Officer in writing when commencing actions in subparagraph (h)(5)(A) or (h)(5)(B).
- (hi) Exemptions
- (1) The owner/operator is exempt from installing a three-sided barrier or enclosure, or using the test methods in the SCAQMD Rule 403 Implementation Handbook for the demonstration of surface stabilization for open storage piles if 90% of the pile's mass consists of materials that are larger than ½ inch. Applicability of this exemption shall be determined through the measurement of any composite sample of at least 10 pounds taken from a minimum depth of 12 inches below the pile surface, and from various locations in the pile, but not from within 12 inches from the base of the pile. This exemption is limited to open storage piles that contain only materials other than clinker, providing that such piles meet the performance standards in subparagraphs (d)(1)(B) and (d)(1)(C).
  - (2) The owner/operator is exempt from the use of chemical dust suppressants for internal unpaved roads if the use of applicable chemical dust suppressants on that specific unpaved road violates the rules and/or regulations of the local Water Quality Control Board or other government agency provided the owner/operator uses water in sufficient quantity and frequency to stabilize the road surface and the owner/operator notifies the Executive Officer in writing 30 days prior to the use of water.
  - (3) Haul trucks are not required to use designated roads for haul trucks if they travel on unpaved roads complying with the requirements in clause (d)(7)(A)(ii).
  - (4) The owner/operator is exempt from the use of chemical dust suppressants in clause (d)(7)(A)(ii) where a road is used less than a monthly average of twice a day by a designated vehicle at a speed limit less than 15 miles per hour.
  - (5) The owner/operator is exempt from the use of chemical dust suppressants on unpaved areas specified in clause (d)(7)(A)(ii) during a period for demolition activities of no longer than six (6) calendar months provided that the owner/operator uses water in sufficient quantity and frequency to stabilize the



unpaved areas, meets the opacity requirements in subparagraphs (d)(1)(B) and (C) at all times, and keeps sufficient records to demonstrate compliance.

- (6) With the exception of primary crushing, open material storage piles, and covers and existing enclosures for conveying systems, the provisions of this rule shall not apply to equipment or operations that are subject to Rule 1157 or Rule 1158 located at the cement manufacturing facilities, provided that there is no backsliding from the current level of control as stated in the permits approved by the Executive Officer prior to November 4, 2005 or as required under Rule 1157 and Rule 1158, whichever is more stringent.
- (7) The owner/operator is exempt from the requirements in clause (d)(5)(C)(i) in the event the wind fence material needs to be removed to perform periodic maintenance of the clinker crane or building. During the time the wind fence material is removed, the clinker crane shall not actively transport clinker material in the building, except for post maintenance equipment testing.
- (8) During day(s) in which the instantaneous wind speeds exceed 25 mph using the on-site wind monitoring equipment pursuant to (d)(13)(A), the owner/operator is exempt from the hexavalent chromium and PM10 averaging provisions of subparagraphs (d)(11)(A) and or (d)(11)(B), and (d)(12)(A) as applicable, provided all open handling of clinker material is ceased and dust controls are applied pursuant to subparagraph (d)(13)(B). If the Executive Officer determines a significant potential of re-entrained hexavalent chromium containing dust from the facility exists during such high wind events, the owner/operator shall implement an approved Mitigation Monitoring Plan to minimize exposure to the surrounding area and to ensure implementation of all applicable dust control measures to meet the requirements of subparagraphs (d)(11)(A) and or (d)(11)(B), and (d)(12)(A), as applicable. The Mitigation Monitoring Plan is due 90 days, inclusive of appropriate plan fees pursuant to Rule 306, after notification by the Executive Officer.

## ATTACHMENT F

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>
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~~Draft~~Final Staff Report

**Proposed Amended Rule 1156 – Further Reductions of Particulate Emissions from  
Cement Manufacturing Facilities**

~~August~~September 2015

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## I. EXECUTIVE SUMMARY

Rule 1156 - Further Reductions of Particulate Emissions from Cement Manufacturing Facilities was adopted in November 2005. The original rule requires cement manufacturing facilities to comply with specific requirements applicable to various operations, as well as materials handling and transport at the facilities. Riverside Cement (RC) in Riverside and California Portland Cement Company (CPCC) in Colton are the two cement manufacturing facilities in the SCAQMD's jurisdiction subject to Rule 1156.

Rule 1156 was amended in March 2009 to further reduce particulate emissions and to address elevated ambient concentrations of the carcinogen, hexavalent chromium ( $\text{Cr}^{+6}$ ), observed at the Rubidoux monitoring station in Western Riverside County as part of the third Multiple Air Toxics Emissions Study (MATES III). To protect the public from  $\text{Cr}^{+6}$  exposure, the amendments included a threshold for  $\text{Cr}^{+6}$  that was established to be  $0.70 \text{ ng/m}^3$  (excluding background), based on a 100-in-a-million fence-line cancer risk. Based on MATES III, a  $0.16 \text{ ng/m}^3$   $\text{Cr}^{+6}$  background was derived based on the two-year sampling effort at nine fixed-site monitoring stations across the Basin (excluding the Rubidoux station). Rubidoux station was excluded from the derivation as its  $\text{Cr}^{+6}$  levels were likely influenced by the cement manufacturing facilities. Therefore, a fence-line effective limit was established at  $0.860 \text{ ng/m}^3$  ( $0.70 + 0.160$ ). The rule amendment also required additional control measures such as: clinker storage area protection,  $\text{Cr}^{+6}$  ambient monitoring, and wind monitoring, with contingencies (i.e., clinker enclosure based on  $\text{Cr}^{+6}$  results and PM10 monitoring in case of elevated concentrations). As part of the rule amendment Resolution, the Board directed staff to re-evaluate the need for, and the frequency of,  $\text{Cr}^{+6}$  ambient monitoring after five (5) years of data collection, and to establish a working group to develop a Facility Closure Air Quality Plan Option (Closure Plan).

Staff met with the working group in 2010 and 2011 to discuss the criteria for facility closure and conditions to potentially sunset  $\text{Cr}^{+6}$  ambient monitoring. A draft closure plan was developed and presented to the Stationary Source Committee (SSC) in 2012, but was left as a living document since neither facility was producing clinker at the time and there was uncertainty regarding future cement manufacturing activities given the economic recession. Currently, both cement manufacturing facilities are still non-operational regarding clinker production. RC and CPCC only process clinker or cement material imported from facilities outside the SCAQMD's jurisdiction.

The rule proposal includes requirements for current owners/operators of the affected property before and after cement manufacturing facility closure, as well as conditions for potential reduction in the number of  $\text{Cr}^{+6}$  monitoring stations and elimination of  $\text{Cr}^{+6}$  ambient monitoring under specific conditions. The proposal is intended to minimize potential air quality impacts from cement facility closure and to streamline  $\text{Cr}^{+6}$  ambient monitoring.

Staff also proposes to revise the Cr<sup>+6</sup> ambient air monitoring fence-line threshold as a result of the 2015 update to the Office of Environmental Health Hazard Assessment's (OEHHA) risk assessment guidelines.

Staff is proposing to change the fence-line Cr<sup>+6</sup> ambient air monitoring threshold from 0.7 ng/m<sup>3</sup> to 0.20 ng/m<sup>3</sup> (excluding background) and to update and refine the calculation determining background levels. The change from 0.7 to 0.2 ng/m<sup>3</sup> maintains the 100-in-a-million risk threshold under the new OEHHA guidelines that account for early-life exposures to air toxics. The Cr<sup>+6</sup> ambient air monitoring background levels are currently 0.062 ng/m<sup>3</sup> and 0.056 ng/m<sup>3</sup> for a 30-day and 90-day rolling average, respectively, based on the 90<sup>th</sup> percentile background concentrations observed at the Fontana and Rubidoux stations as part of the fourth Multiple Air Toxics Exposure Study (MATES IV). With these background levels, the new Cr<sup>+6</sup> effective limit will be 0.262 ng/m<sup>3</sup> and 0.256 ng/m<sup>3</sup> for a 30-day and 90-day rolling average, respectively. Staff also proposes an implementation schedule for the new fence-line limit phase-in.

Staff conducted a public consultation meeting in April 2015 to solicit input on the April version of proposed rule, including dust control measures. In response to industry's request, the Public Hearing was rescheduled to September 2015 to allow additional time for stakeholders to provide comments. Staff conducted a public workshop in June 2015 to seek additional input on the additional proposed Cr<sup>+6</sup> ambient air monitoring background and fence-line threshold, the implementation schedule for the new Cr<sup>+6</sup> standard and compliance requirements in the event of Cr<sup>+6</sup> exceedance, and the criteria to validate duplicate source tests at low PM10 concentrations (significantly less than the PM emission limit of 0.01 grain/dscf, in paragraph (d)(6)). In addition, staff has worked extensively with representatives of both cement facilities.

The following summarizes the key proposed amendments:

- Rule purpose and applicability are updated to clarify applicability of the rule after facility closure;
- Criteria for facility closure relative to cement manufacturing operation: activities must be completely ceased (i.e., blending silo, kiln, clinker cooler, and clinker grinding/milling) and related permits must be surrendered or have expired and are no longer reinstatable;
- Condition for reducing Cr<sup>+6</sup> ambient monitoring stations at existing cement facilities:
  - Approval for reduced number of monitoring stations (minimum of one) may be obtained upon subsequent 12 consecutive months of demonstrating less than Cr<sup>+6</sup> threshold (0.70 ng/m<sup>3</sup> and/or 0.20 ng/m<sup>3</sup>, excluding background, depending on the compliance date) after date of rule amendment;
  - Reversion to the most recently approved compliance monitoring plan within 14 calendar days of being notified by the SCAQMD of confirmed exceedances of the applicable threshold, considering wind and other relevant data;

- Effective September 5, 2016, ambient Cr<sup>+6</sup> concentrations from a 30-day or 90-day rolling average at each monitoring station shall not exceed 0.20 ng/m<sup>3</sup> (excluding background). Prior to this date, the previous Cr<sup>+6</sup> threshold of 0.70 ng/m<sup>3</sup> (excluding background) remains in effect;
- Within 60 days from notification of a confirmed exceedance of 0.20 ng/m<sup>3</sup> (excluding background) that occurs prior to September 5, 2018, but after September 5, 2016, a compliance plan with detailed descriptions of all feasible mitigations measures must be submitted for approval in addition to the appropriate fees. Failure to obtain an approved compliance plan is a violation of Rule 1156;
- The compliance plan requirement will not apply to owner/operator who has an approved or has been required to submit a Health Risk Assessment under Rule 1402 – Control of Toxic Air Contaminants for Existing Sources;
- A confirmed Cr<sup>+6</sup> exceedance of 0.20 ng/m<sup>3</sup> (excluding background) that occurs on or after September 5, 2018 will be a violation of the rule;
- Criteria to validate duplicate source tests:
  - PM10 concentrations of both samples must be below 0.002 grain/dscf; or
  - The difference between two samples shall be less than 35% of their average and the difference between the sample catches (normalized to the average sampling volume) shall be less than 3.5 milligrams;
- Requirements after facility closure:
  - The facility closure provision is applicable only to owner/operator of the property on which a cement manufacturing facility operated on or after November 4, 2005;
  - Continued Cr<sup>+6</sup> ambient monitoring in compliance with the applicable thresholds and compliance plan, inclusive of reduction to a minimum of one monitoring station;
  - Provisions for Cr<sup>+6</sup> ambient monitoring relocation ~~and co-located monitoring and sampling by SCAQMD~~;
  - Requirement for monitoring calibration and maintenance;
  - The facility closure provisions cease to apply if both (1) and (2) occur:
    - (1) Completed implementation of an approved reclamation plan by the lead agency; or completed clean-up/rehabilitation of the property with all permanent stabilization measures ~~and done~~ in compliance with SCAQMD Rules, including SCAQMD Rule 403 – Fugitive Dust during equipment dismantling or demolition and material removal; ~~and/or~~ determination from the Executive Officer that no further action is required or the reclamation/clean-up/rehabilitation activities have been satisfactory completed; and
    - (2) Subsequent three months of demonstrated compliance with the applicable Cr<sup>+6</sup> ambient monitoring thresholds after completion of reclamation/clean-up/rehabilitation or no further action determination.

A site-specific assessment may be submitted for approval so that areas that are not potentially contaminated can be excluded from the reclamation/clean-up/rehabilitation activities.

## II. BACKGROUND

Portland cement is commonly manufactured through a dry method in which the combination of ground limestone rock and iron ore or other materials is fed to a cement kiln. As the materials move through the rotating kiln at high a temperature (about 2,700 degree Fahrenheit), some elements are driven off as gases or particulates and the remaining form a new substance called clinker. Clinker comes out of the kiln as hot, gray spheres about the size of large marbles. Clinker is cooled, ground and/or milled to a very fine product, and blended with small amounts of gypsum and fly ash to become cement, which is sold in packages or in bulk.

According to staff analysis in 2008 that included soil sampling, ambient air samples, and emissions modeling, uncontrolled clinker material handling at cement manufacturing facilities associated with outdoor storage, transfer and re-entrained road dust were found to be the sources of the elevated ambient hexavalent chromium ( $\text{Cr}^{+6}$ ) concentrations in Rubidoux and at monitors placed in the adjacent communities. Kilns and finish mills at cement manufacturing facilities can also influence the formation and emissions of  $\text{Cr}^{+6}$ .  $\text{Cr}^{+6}$  is a potent, known carcinogen, exposure to which could result in lung cancer, irritation and damage to the skin, eyes, nose, throat, and lung, asthma symptoms, and/or allergic skin reactions. Since clinker materials might also contain other toxics such as lead, arsenic, cadmium, and cobalt in addition to  $\text{Cr}^{+6}$ , controlling emissions from these activities is essential.

Currently, both RC and CPCC are no longer producing clinker on-site. CPCC only imports cement from its Mojave facility for batch operations. RC previously manufactured clinker at the Riverside facility, but discontinued this operation many years ago. RC continues its cement manufacturing at this location by bringing in clinker from its Mojave facility for grinding, blending, and packaging.

At the time of the 2009 amendment, CPCC and RC had expressed a need for an off-ramp or sunset in  $\text{Cr}^{+6}$  monitoring upon facility closure. As currently written, Rule 1156 does not contain any such provisions. After facility closure, a cement manufacturing facility property can be converted for a variety of other uses. These potential uses can provide long-term stabilization of the land and as a result, can improve air quality in the area; however, during such land transformation,  $\text{Cr}^{+6}$  in soils might be re-entrained during land disturbance activities such as demolition, construction, grading, and paving. To ensure no degradation to air quality after facility closure and long-term public health protection, continued  $\text{Cr}^{+6}$  ambient monitoring after closure, and soil sampling, ground stabilization, and dust mitigation at the property related to land disturbing activities are important. However, recognizing a continued low level of  $\text{Cr}^{+6}$  concentrations in compliance with the Rule 1156 threshold during the past five years of monitoring, staff is proposing conditions for reducing or eliminating the required  $\text{Cr}^{+6}$  ambient monitoring, at existing cement facilities and after facility closure, in addition to other proposed rule revisions.



**A. Regulatory History**

Rule 1156 - Further Reductions of Particulate Emissions from Cement Manufacturing Facilities was adopted in 2005. The rule requires cement manufacturing facilities to comply with specific requirements, ranging from tarping, partial cover, dust suppressant, and total enclosure to control devices applicable to various operations and equipment, including kiln and clinker coolers and material storage, handling, processing, and transferring. To prevent track-out from the facility's roadways and areas, Rule 1156 requires specific controls, such as sweeping, speed limits, chemical dust suppressants, gravel pads, rumble grates, and truck/wheel washers, etc. RC Riverside Cement (RC) in Riverside and California Portland Cement (CPCC) in Colton are the only two cement manufacturing facilities in the SCAQMD's jurisdiction, and thus the only two facilities subject to Rule 1156.

Rule 1156 was amended in March 2009 to address unexpected elevated levels of Cr<sup>+6</sup>, a potent known human carcinogen, observed at the Rubidoux monitoring station and at monitors adjacent to the facilities as part of the MATES III. These elevated concentrations were traced back to uncontrolled clinker materials handling associated with outdoor storage and transfer, and to re-entrained road dust at cement manufacturing facilities. Cr<sup>+6</sup> emissions also occurred from facility operations, including kilns, kiln dust ponds, and finish mills since they can also influence the formation and emissions of Cr<sup>+6</sup>.

The 2009 rule amendment included adoption of an ambient Cr<sup>+6</sup> limit of 0.70 ng/m<sup>3</sup> based on a 100 in a million fence-line risk, less background. The 2009 rule amendment also required additional control measures at the facilities, such as: clinker storage area protection (i.e., wind fencing and impervious tarps), Cr<sup>+6</sup> ambient monitoring, and wind monitoring, with contingencies (i.e., clinker enclosure based on Cr<sup>+6</sup> results and PM10 monitoring in case of elevated concentration), to further reduce particulate and Cr<sup>+6</sup> emissions from cement manufacturing facilities. Under a Governing Board adoption resolution, the need for and frequency of Cr<sup>+6</sup> ambient monitoring was to be re-evaluated after five (5) years of data collection and a working group was established to develop a Facility Closure Air Quality Plan Option (Facility Closure Plan). Cr<sup>+6</sup> ambient monitoring results have been reported annually to the Stationary Source Committee beginning in 2011, and bi-annually to the Governing Board beginning in 2012.

**B. Five-Year Hexavalent Chromium Ambient Monitoring**

Figure 1 shows the previous locations of SCAQMD's Cr<sup>+6</sup> monitoring stations (numbered 1 through 10) in Western Riverside and San Bernardino Counties that were used during the initial investigation. All but location 7 were subsequently removed as the Rule 1156 requirements for monitoring at

the facilities were implemented. Figure 1 also shows the current locations of the four Cr<sup>+6</sup> monitoring stations at RC and the three stations at CPCC.

**Figure 1 - Sampling Locations for Hexavalent Chromium in Western Riverside and San Bernardino Counties**

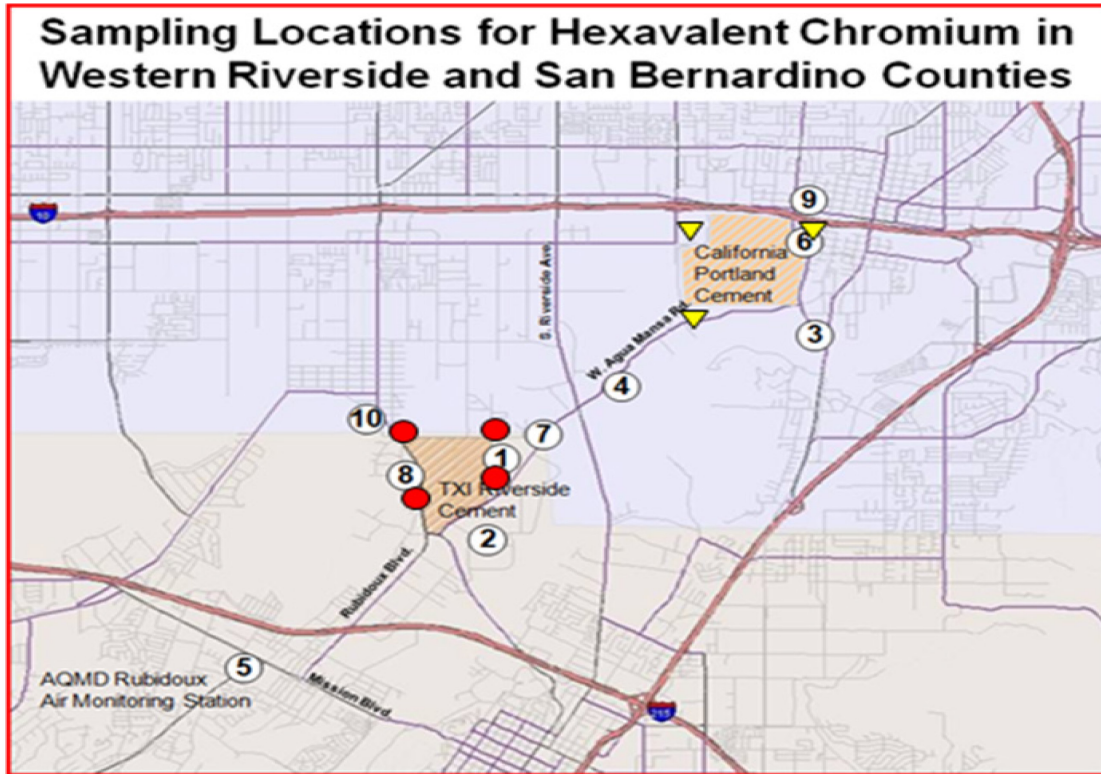
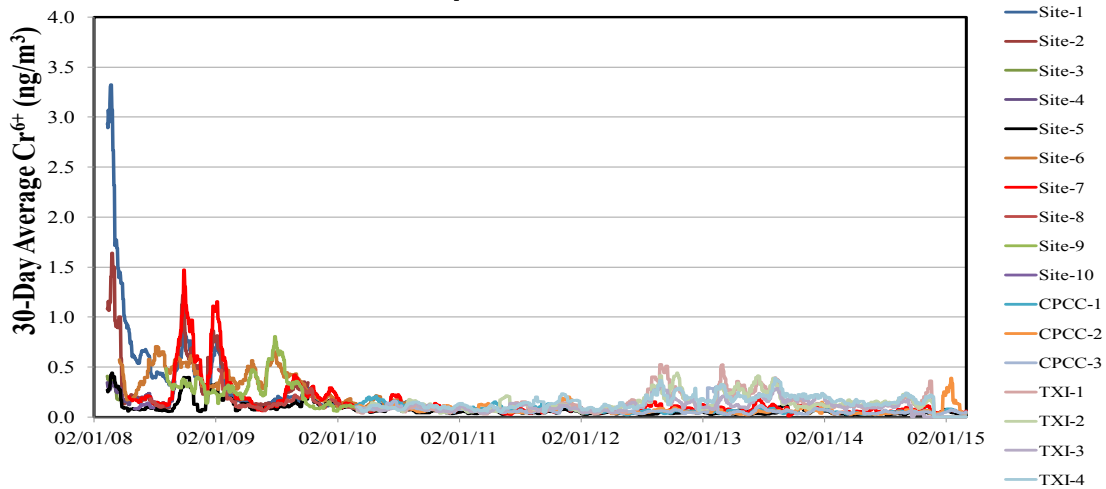


Figure 2 depicts the 30-day rolling average of Cr<sup>+6</sup> ambient air concentrations at the monitoring stations in Western Riverside and San Bernardino Counties, as well as at CPCC and RC since 2008.

Since implementation of a settlement agreement with RC in August 2008 and RC’s voluntary shut down of its white cement kilns and finish mills due to the economic climate, the 30-day rolling average of Cr<sup>+6</sup> shows an overall downward trend, except for some incidents where elevated ambient concentrations of Cr<sup>+6</sup> were detected. However, since the implementation of amended Rule 1156 in March 2010, the 30-day rolling average of Cr<sup>+6</sup> ambient concentrations measured at the monitoring stations in Western Riverside and San Bernardino Counties, as well as at CPCC and RC, indicate continued compliance with the current Rule 1156 threshold (0.7 ng/m<sup>3</sup>, excluding background concentration of 0.16 ng/m<sup>3</sup>).

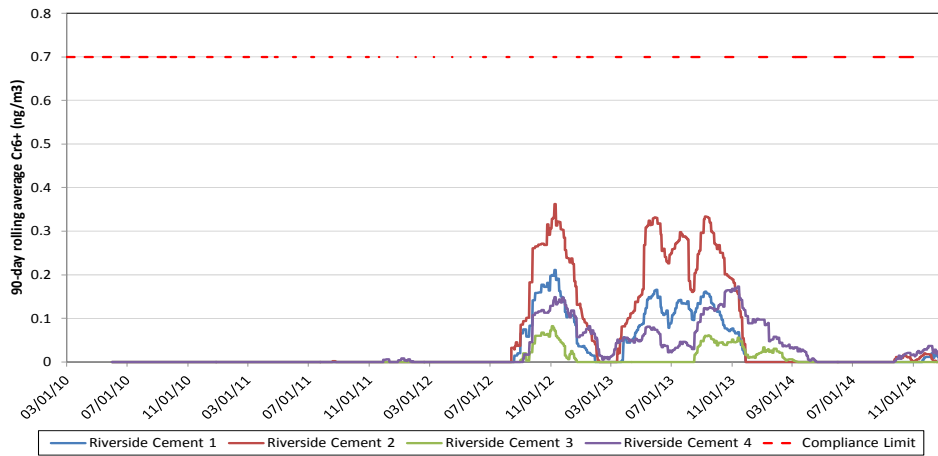
## Figure 2 - 30-Day Rolling Average All Sites | 2008 - Current



Per Rule 1156, after 12 months of no exceedances of Cr<sup>+6</sup> ambient air concentrations under the 1-in-3-day sampling schedule, CPCC and RC changed their 24-hour Cr<sup>+6</sup> ambient monitoring sampling to a 1-in-6-day schedule and a 90-day average threshold calculation in April 2011.

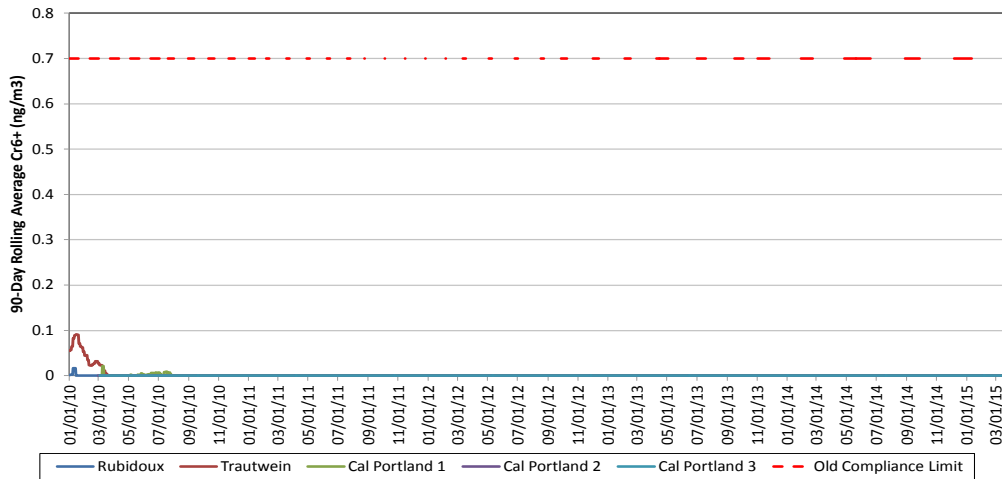
Figures 3 and 4, respectively, depict RC and CPCC's 90-day rolling average of Cr<sup>+6</sup> ambient air concentrations, excluding the background of 0.16 ng/m<sup>3</sup> as per Rule 1156. The background level of 0.16 ng/m<sup>3</sup> was based on the Cr<sup>+6</sup> ambient air concentrations from the two-year sampling effort of MATES III (from 2004 to 2006) at nine fixed-site monitoring stations across the Basin (excluding the Rubidoux station). The Rubidoux station was excluded from the calculation as its Cr<sup>+6</sup> levels were influenced by the cement manufacturing facilities.

Figure 3 - 90-Day Rolling Average minus Background – Riverside Cement<sup>1</sup>



<sup>1</sup> Per the South Coast AQMD 2005 Staff Report for Rule 1156, a background concentration of 0.16 ng/m<sup>3</sup> (MATES IV Study; average Cr<sup>6+</sup> concentration in Fontana and Rubidoux; MATES III Study; average Cr<sup>6+</sup> concentration at nine stations, excluding Rubidoux) is utilized for rolling average compliance calculations. The rolling average is reported as a value of zero when the rolling average is less than or equal to zero.

Figure 4 - 90-Day Rolling Average minus Background – CPCC<sup>1</sup>



<sup>1</sup> Per the South Coast AQMD 2005 Staff Report for Rule 1156, a background concentration of 0.16 ng/m<sup>3</sup> (MATES IV Study; average Cr<sup>6+</sup> concentration in Fontana and Rubidoux; MATES III Study; average Cr<sup>6+</sup> concentration at nine stations, excluding Rubidoux) is utilized for rolling average compliance calculations. The rolling average is reported as a value of zero when the rolling average is less than or equal to zero.

The 90-day rolling averages of Cr<sup>6+</sup> are calculated based on the 1-in-6-day sampling for data measured after April 2011 when both facilities converted from a 1-in-3-day sampling schedules to a 1-in-6-day sampling. The 90-day rolling averages prior to April 2011 are calculated based on the 1-in-3-day measurements. The rolling average is reported as a zero value if it is less than or equal to zero (at or below background). For RC, the peak of the 90-day rolling average of Cr<sup>6+</sup> ambient air concentrations collected at each of

their four monitoring stations was below  $0.4 \text{ ng/m}^3$ , less than the Rule 1156 limit of  $0.7 \text{ ng/m}^3$ . For CPCC, the 90-day rolling average of  $\text{Cr}^{+6}$  ambient air concentrations collected at each of their three monitoring stations are all below  $0.1 \text{ ng/m}^3$ .

**C. *Cement Facility Closure Working Group***

The Cement Facility Closure Working Group was convened and consisted of representatives from CPCC and RC, as well as staff from the Santa Ana Regional Water Quality Control Board and the San Bernardino County Land Use Services Department. The working group's purpose was to ensure minimal air quality impacts from cement facility closure and long-term health protection for the surrounding communities.

Staff conducted two working group meetings in 2011 and 2012. Potential criteria for facility closure, ways to measure long-term soil stability, steps to ensure long-term health protection, and conditions to sunset the  $\text{Cr}^{+6}$  monitoring requirements were discussed. A draft Facility Closure Plan, inclusive of input and recommendations from the working group, was presented to the Stationary Source Committee (SSC) in 2012, but was left as a living document since neither facility was producing clinker at the time and uncertainties existed as to the restarting of clinker and cement manufacturing activities when the economy recovered.

**D. *Update to OEHHA Risk Assessment Guidelines***

Since the 1990s, it has been a Governing Board policy, as established in Rules 1401 – New Source Review of Toxic Air Contaminants and 1402 – Control of Toxic Air Contaminants from Existing Sources, for the assessment of public health risk to be conducted via guidelines established by OEHHA. Under AB2588, the SCAQMD is required to follow OEHHA guidelines for health risk assessments, H&S §44360(b)(2). In April 2015, OEHHA finalized updates to its guidelines for determination of risk. The guidelines include an update to how risk is calculated. Specifically, the guidelines now include age sensitivity factors, updated breathing rates and the number of years spent at home or at the workplace. The result is a net cancer risk increase for residential receptors of approximately three times the prior calculated levels. In the case of hexavalent chromium, due to the multi-pathway exposure, the risk increases by a factor of 3.87. Based on the revised guidelines, fence-line  $\text{Cr}^{+6}$  levels for a 100-in-a-million cancer risk would be  $0.181 \text{ ng/m}^3$ . The Basin-average  $\text{Cr}^{+6}$  ambient monitoring concentration based on MATES IV is  $0.056 \text{ ng/m}^3$ . Staff's proposal to address the updated guidelines and to update and refine the  $\text{Cr}^{+6}$  background calculation pertaining to Rule 1156 is described herein.

***E. Public Process***

In addition to the working group meetings in 2011 and 2012, staff also met with representatives of CPCC and RC beginning in January 2015 to solicit comments on the proposed amendment concepts. Comments received were incorporated into development of the April version of proposed amendments, as appropriate.

Staff conducted a working group meeting on April 7, 2015 to present detailed proposed amendments. Draft rule language was released to the working group for their review and comments prior to the SSC meeting on April 17<sup>th</sup>. Staff conducted a public consultation meeting on April 22<sup>nd</sup> near a cement facility for ease of community participation, to solicit input on the April version of proposed rule, including dust control measures. Since then, staff also met with RC and CPCC on two separate occasions in May regarding the proposed more stringent threshold and determination of the actual emission sources to be addressed if there is an exceedance.

Staff conducted a public workshop in June 2015 to seek additional input on the proposed Cr<sup>+6</sup> ambient air monitoring fence-line threshold, the implementation schedule for new Cr<sup>+6</sup> standard, compliance requirements in the event the Cr<sup>+6</sup> levels are exceeded, and the criteria to validate duplicate PM10 source tests at low concentrations (significantly less than the emission limit of 0.01 grain/dscf). Following the public workshop, staff conducted a site visit to learn more about the current operational status at one facility. Staff also met with both facilities on two occasions in July to address issues regarding the new Cr<sup>+6</sup> ambient air monitoring fence-line threshold and background, and the continued monitoring requirement after facility closure.

In response to industry's request, the Public Hearing was rescheduled to September 2015 to allow additional time for stakeholders to provide comments.

**III. PROPOSED AMENDMENTS**

***A. Reduced Monitoring and Facility Closure***

To address potential air quality impacts from the closure of cement manufacturing facilities and to ensure long-term air quality and protection, staff proposes to update and clarify rule applicability after facility closure.

Staff also proposes the criteria for facility closure. To qualify for facility closure, all cement manufacturing operations/equipment, including but not limited to blending silo, kiln, clinker cooler, and clinker grinding/milling must be completely ceased, and all related permits for operation must be surrendered or are expired and not reinstatable.

To streamline Cr<sup>+6</sup> ambient monitoring at existing cement manufacturing facilities, staff proposes conditions for reducing the number of Cr<sup>+6</sup> ambient monitoring stations. After the date of rule amendment and upon a subsequent twelve (12) consecutive months of demonstrating less than the applicable Cr<sup>+6</sup> threshold (0.70 ng/m<sup>3</sup> and/or 0.20 ng/m<sup>3</sup>, depending on the date of compliance, excluding background), the owner(s)/operator(s) may submit for approval an amended compliance monitoring plan to operate a minimum of one monitoring station, predominantly downwind from the emission source(s). However, if such thresholds are confirmed to have been exceeded at any time while under the new monitoring plan, the owner(s)/operator(s) must revert back to prior monitoring requirements, which include a minimum of three (3) monitoring stations, and comply with the previously approved compliance monitoring plan. Reverting back to the prior monitoring requirements must occur within 14 days of notification if the Executive Officer confirms through wind event or other wind data, as necessary, that the facility is the source of the emissions.

To ensure no degradation to air quality after a facility closure, the proposed amendments require owner/operator of the property on which a cement manufacturing facility has operated on or after November 4, 2005, to continue their Cr<sup>+6</sup> ambient monitoring in accordance with the most recent monitoring plan, schedule, and applicable threshold until both (1) and (2) are met:

- (1) Completed implementation of an approved reclamation plan by the lead agency; or completed clean-up/rehabilitation of the property with permanent stabilization measures ~~and done~~ in compliance with SCAQMD Rules, including SCAQMD Rule 403 – Fugitive Dust during equipment dismantling or demolition and material removal; ~~and/or~~ determination from the Executive Officer that no further action is required or the reclamation/clean-up/rehabilitation activities have been satisfactory completed; and
- (2) Subsequent three months of demonstrated compliance with the applicable Cr<sup>+6</sup> thresholds after completion of reclamation/clean-up/rehabilitation or no further action determination.

A site-specific assessment may be submitted for approval so that areas that are not potentially contaminated can be excluded from the reclamation/clean-up/rehabilitation activities.

The proposed amendments also include provisions for Cr<sup>+6</sup> ambient monitoring relocation and monitoring calibration and maintenance requirement. In the event of any relocation of ambient Cr<sup>+6</sup> monitor(s), the owner(s)/operator(s) must notify the SCAQMD in writing and obtain its approval prior to such relocation. The owner(s)/operator(s) must move the monitor(s) back to the original location(s) or other approved locations(s) within the timeframe specified by the SCAQMD. The owner(s)/operator(s)

is also required to provide the SCAQMD with monitoring calibration and maintenance upon request.

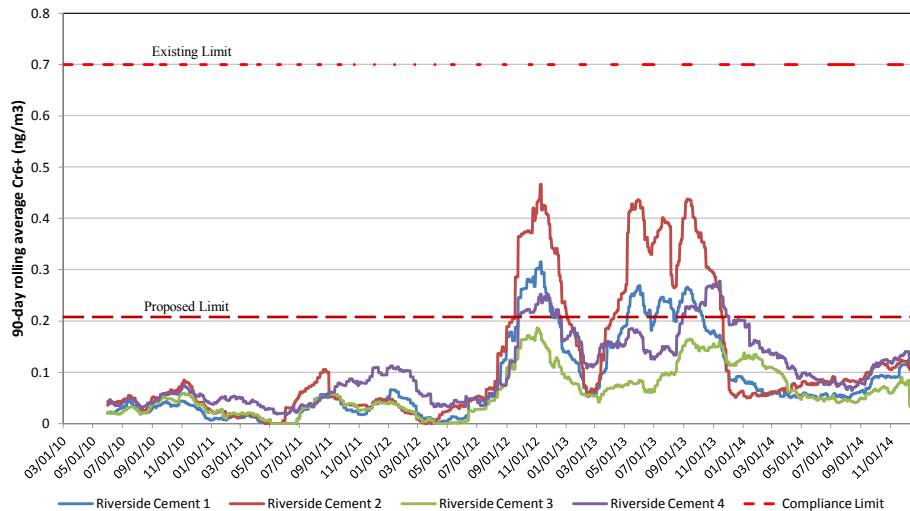
**B. Cement Facilities and New OEHHA Guidance**

As previously discussed, under the 2015 update to the OEHHA’s risk assessment guidelines, the fence-line Cr<sup>+6</sup> ambient monitoring threshold is proposed to be lowered to 0.20 ng/m<sup>3</sup> (excluding background). This maintains the 100 in a million cancer risk at the facility fence line.

Staff also updates the background level concentration for determining compliance with the fence-line risk. Specifically, the MATES IV Basin average background risk is 0.056 ng/m<sup>3</sup>. However, staff proposes two different MATES IV sites (Fontana and Rubdidoux) Cr<sup>+6</sup> background levels applicable to the proximity of RC and CPCC for two different sampling schedules. Using the 90<sup>th</sup> percentile data, the 30-day rolling average Cr<sup>+6</sup> background concentration for a 1-in-3 sampling schedule would be 0.062 ng/m<sup>3</sup>, and the 90-day rolling average Cr<sup>+6</sup> background concentration for a 1-in-6 sampling schedule would be 0.056 ng/m<sup>3</sup>. These background levels will be used for Rule 1156 compliance purposes. Therefore, the proposed new effective limits would be 0.262 ng/m<sup>3</sup> and 0.256 ng/m<sup>3</sup>, respectively.

Figures 5 and 6, respectively, depict RC and CPCC’s 90-day rolling average of Cr<sup>+6</sup> ambient air concentrations in relation to the newly proposed 0.20 ng/m<sup>3</sup> threshold, less the background concentration of 0.056 ng/m<sup>3</sup>

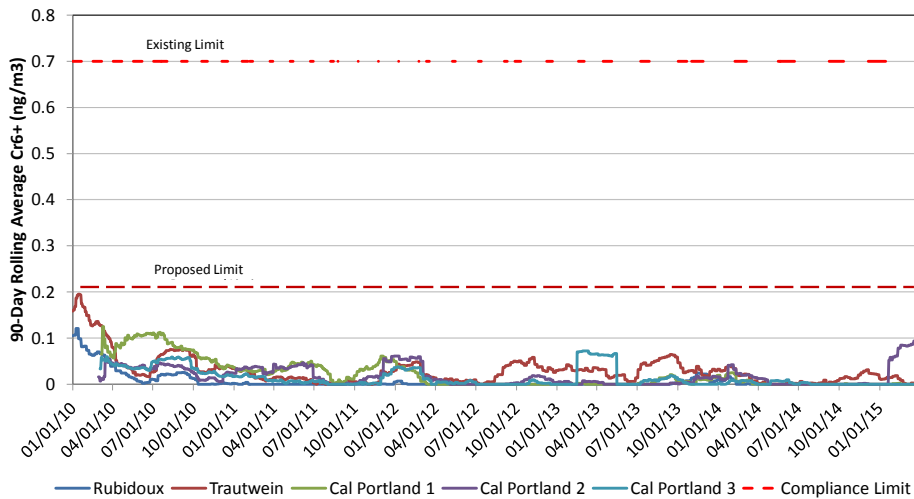
Figure 5 - 90-Day Rolling Average minus Background – Riverside Cement<sup>1</sup>



<sup>1</sup> A background level of 0.056 ng/m<sup>3</sup> (MATES IV Study; 90<sup>th</sup> percentile Cr<sup>+6</sup> concentration in Fontana and Rubidoux) is utilized for the rolling average compliance calculations. The rolling average is reported as a value of zero when the rolling average is less than or equal to zero.



Figure 6 - 90-Day Rolling Average minus Background – Cal Portland Cement<sup>1</sup>



<sup>1</sup> A background level of 0.056 ng/m<sup>3</sup> (MATES IV Study; 90<sup>th</sup> percentile Cr<sup>6+</sup> concentration in Fontana and Rubidoux) is utilized for the rolling average compliance calculations. The rolling average is reported as a value of zero when the rolling average is less than or equal to zero.

As with Figures 3 and 4, the 90-day rolling averages of Cr<sup>6+</sup> from these figures are calculated based on the 1-in-6-day sampling for data measured after April 2011 when both facilities converted from a 1-in-3-day sampling schedules to a 1-in-6-day sampling. The 90-day rolling averages prior to April 2011 are calculated based on the 1-in-3-day measurements. The rolling average is reported as a zero value if it is less than or equal to zero.

For RC, the peak of the 90-day rolling average of Cr<sup>6+</sup> ambient air concentrations collected at each of their four monitoring stations were occasionally above the newly proposed 0.20 ng/m<sup>3</sup>. According to RC, higher than usual Cr<sup>6+</sup> levels occurred when the facility restarted their finishing mills at less than full capacity. However, since that time, RC has operated below the threshold. Staff will continue working with RC on the potential impact of the new fence-line threshold as production increases to near capacity.

For CPCC, the peak of the 90-day rolling average of Cr<sup>6+</sup> ambient air concentrations collected at each of their four monitoring stations is below the proposed 0.20 ng/m<sup>3</sup>. Even using the new, lower background level and threshold, CPCC's past monitoring has been consistently lower than the proposed limit.

To address industry's concern, staff proposes an implementation schedule for the updated Cr<sup>6+</sup> threshold and a provision that wind and other relevant data will be examined to determine whether the cement facility is the actual source of any Cr<sup>6+</sup> exceedances. As proposed, effective September 5, 2016, the Cr<sup>6+</sup> concentrations from a 30-day or 90-day rolling average at each

monitoring station shall not exceed 0.20 ng/m<sup>3</sup> (excluding background). Starting September 5, 2016, the Cr<sup>+6</sup> threshold of 0.20 ng/m<sup>3</sup> and background concentrations of 0.062 ng/m<sup>3</sup> and 0.056 ng/m<sup>3</sup> would be utilized for the rolling average compliance calculations. The current Cr<sup>+6</sup> threshold of 0.70 ng/m<sup>3</sup> (excluding background of 0.16 ng/m<sup>3</sup>) would still be operative prior to this date.

The proposed amendments also require the owner(s)/operator(s) to submit for approval a compliance plan for any confirmed Cr<sup>+6</sup> exceedance of the new threshold of 0.20 ng/m<sup>3</sup> occurring prior to September 5, 2018, but after September 5, 2016. A failure to obtain an approved compliance plan will be a violation of Rule 1156. The compliance plan and appropriate fees must be submitted within 60 days of SCAQMD's notice and must include the following in addition to basic contact information: (1) a description of the activities, including a site location map; (2) a listing of all potential sources of fugitive dust emissions within the property line; (3) a description of the implementation schedule and frequency of all applicable dust control measures listed in Rule 403 – Fugitive Dust; and (4) a detailed description of additional feasible control and/or stabilization measures that will be applied to each of the emission sources and the application frequency.

The requirement for a compliance plan will not apply to facilities that have an approved, or have been required to submit, a Health Risk Assessment under Rule 1402 – Control of Toxic Air Contaminants for Existing Sources as it is expected that compliance with Rule 1402 will adequately prevent risks from exceeding the action level.

To ensure public health protection, staff also proposes that any confirmed Cr<sup>+6</sup> exceedance of the new threshold of 0.20 ng/m<sup>3</sup> occurring on or after September 5, 2018 will be a violation of Rule 1156, even if they are subject to Rule 1402.

### ***C. Other Proposed Amendments***

To address industry's concern regarding unnecessary cost to comply with current precision requirements for duplicate source tests with significantly lower PM10 concentrations than the emission limit of 0.01 grain/dscf, staff also proposes to revise the criteria to validate duplicate samples. Specifically, PM10 concentrations of both samples must be below 0.002 grain/dscf; or the difference between two samples must be less than 35% of their average and the difference between the sample catches (normalized to the average sampling volume) must be less than 3.5 milligrams.

## **IV. CALIFORNIA ENVIRONMENTAL QUALITY ACT**

SCAQMD staff has reviewed the proposed project pursuant to CEQA Guidelines §15002 (k) – General Concepts, the three-step process for deciding which document to prepare for a project subject to the California Environmental Quality

ACT (CEQA). SCAQMD staff has determined that the proposed amendments to Rule 1156 are a discretionary action by a public agency, which has potential for resulting in direct or indirect changes to the environment and, therefore, is considered a “project” as defined by CEQA. SCAQMD staff’s review of the proposed project shows that the proposed project would not have a significant adverse effect on the environment. Therefore, pursuant to CEQA Guidelines §15252 and 15126.6(f), no alternatives are proposed to avoid or reduce any significant effects because there are no significant adverse impacts, and pursuant to CEQA Guidelines §15126.4(a)(3), mitigation measures are not required for effects not found to be significant. SCAQMD has prepared a draft Environmental Assessment to address the potential adverse environmental impacts associated with the proposed project which was released for a 30-day public review beginning on July 21 and ending on August 19, 2015.

## V. SOCIOECONOMIC ASSESSMENT

PAR 1156 would, among other changes, establish a more stringent fence-line Cr<sup>+6</sup> ambient monitoring threshold, effective September 5, 2016. The amendments would also reduce the required monitoring effort (i.e., number of monitors) by the affected facilities, provided that monitors consistently demonstrate ambient concentrations below the threshold as specified in the proposed amendments. Additionally, the proposed amendments to Rule 1156 also include facility closure provisions.

### A. *Affected Facilities and Industries*

The proposed amendments would affect two cement manufacturing facilities [North American Industrial Classification System (NAICS) 327310]. They are located, one each, in Riverside and San Bernardino counties respectively. According to the Dun and Bradstreet database acquired in January 2015, neither facility would be classified as a small business under the Federal Small Business Administration definition.

### B. *Compliance Costs*

For ongoing cement manufacturing operations at a facility, continued compliance with the fence-line threshold for 12 months post adoption would allow the facility to reduce the number of ambient monitors to one in the principally downwind area. The ability to reduce the number of monitoring stations after meeting all criteria would potentially result in cost savings due to reduced spending on sampling and analysis. The estimated cost-saving would amount to approximately ~~\$100,000~~ \$112,500 per year for one facility and ~~\$75,000~~ \$30,500 per year for the other.<sup>1</sup>

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<sup>1</sup> The cost-saving at the first facility was based on ~~the its own~~ annual monitoring cost estimate recently submitted to the SCAQMD ~~by one of the affected facilities~~ for running a one in six-day sampling schedule. SCAQMD staff divided the estimate of \$150,000 by ~~three~~ four, the number of monitors currently in operation at the facility, to arrive at the cost per monitor, or the cost-saving per retired monitor. ~~Staff also~~

It is possible that one of the two affected facilities may not, based on previous monitoring data, be able to consistently comply with the more stringent fence-line  $\text{Cr}^{+6}$  ambient monitoring threshold of  $0.20 \text{ ng/m}^3$  without implementing additional control measures. As a consequence, this facility may need to submit a compliance plan, increase housekeeping measures, implement additional dust stabilization, and worst case, install control equipment. A compliance plan would not be necessary if the facility had previously approved or is currently required to submit a Health Risk Assessment pursuant to Rule 1402. Depending on the risks estimated in the Health Risk Assessment, the facility may need to develop and implement a Risk Reduction Plan. The actions taken are likely similar under a compliance plan or a Risk Reduction Plan. Compliance costs associated with compliance plan submission, if applicable, would include a one-time cost of \$1,925, which includes filing and plan evaluation fees. Under a compliance plan or Risk Reduction Plan, the potential cost of purchasing additional chemical stabilizers would amount to approximately \$243,000 annually based on the potential need of two additional applications per year to approximately 50 acres, cumulatively, of facility property.<sup>2</sup> In addition, the purchase and installation of one additional steel partitioning wall, 125 feet in length and 75 feet in height, within an existing building near a cement packaging operation may be necessary to contain dust within the building, as well as four PVC curtain doors, each of 25 feet in length and 35 feet in height, to prevent dust from exiting.<sup>3</sup> The capital cost of the one steel ~~partitioning~~ partitioning wall would amount to approximately \$172,000, based on the unit cost assumption of \$18.30/ft<sup>2</sup>. The capital cost of the four PVC curtain doors would total approximately \$14,700, based on the unit cost assumption of \$4.50/ft<sup>2</sup>. (Note that all costs are expressed in 2015 dollars.)

Relative to facility closure, the proposed amendments would provide additional relief from monitoring through continued compliance with the fence-line threshold requirements until three months after site clean-up or remediation. The newly included facility closure provision would potentially reduce the required number of  $\text{Cr}^{+6}$  monitors following facility

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~~assumes that the monitoring cost would be lower, by 25 percent, for t~~The other facility currently operates three monitors and incurred a lower monitoring cost because it used the SCAQMD laboratory, which charged a lower fee, for sampling analysis due to variations in fees charged by different sample analysis labs. Staff derived the potential cost-saving for this facility based on the SCAQMD laboratory billing record over a one-year period between April 1, 2015 and March 31, 2016 of \$45,800 and the three monitors that they operate.

<sup>2</sup> The unit cost of chemical stabilizer application was based on a 2008 estimate of 5 cents/ft<sup>2</sup>. The unit cost was inflated to 2015 dollars using the Marshall and Swift Indices.

<sup>3</sup> Notice that the erection of the partitioning wall would be a worst case scenario. The facility may be able to achieve emission reductions through less costly compliance options, such as additional housekeeping measures, closing off doorways and other exit points, etc.

closure to one, principally downwind, if the reduction of monitors has not yet occurred while a facility is in operation. According to staff estimates, the aggregate cost-savings from reduced sampling and analysis for the owner(s)/operator(s) of both facilities undergoing closure would be approximately ~~\$8,300~~ \$9,400 per month at one facility and ~~\$6,200~~ \$2,500 per month at the other.<sup>4</sup> Relative to the amendments regarding duplicative source tests, there is a potential cost savings in that unnecessary duplicate source testing will be avoided in the future while accomplishing the same goal as the current requirement.

When the annual compliance cost is less than one million dollars, the Regional Economic Impact Model (REMI) is not used to analyze impacts on jobs and other socioeconomic impacts because the impact results would be very small and would fall within the noise of the model. A major portion of the socioeconomic report covers the regional jobs and other socioeconomic impacts generated from the REMI model. As such, when the REMI model is not run, the socioeconomic assessment is included in the staff report scenario.

## VI. DRAFT FINDINGS

Health and Safety Code Section 40727 requires the SCAQMD to adopt written findings of necessity, authority, clarity, consistency, non-duplication and reference.

### **Necessity**

A need exists to amend Rule 1156 to allow flexibility to the facilities given a continuous demonstration of compliance and to conditionally sunset Cr<sup>+6</sup> monitoring after facility closure. A need also exists to update the ambient Cr<sup>+6</sup> threshold based on updated OEHHA's risk assessment guidelines.

### **Authority**

The SCAQMD Board obtains its authority to adopt, amend, or repeal rules and regulations from California Health & Safety Code Sections 39002, 40000, 40001, 40440, 40702, and 40725 through 40728, and 41700, inclusive.

### **Clarity**

The proposed amended rule has been written or displayed so that its meaning can be easily understood by persons directly affected by it.

### **Consistency**

The proposed amended rule is in harmony with and not in conflict with or contrary to, existing statutes, court decisions or state or federal regulations.

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<sup>4</sup> The cost-saving estimates were based on the estimated cost-saving of ~~\$100,000~~ \$112,500 per year at one facility and ~~\$75,000~~ \$30,500 at the other, for reducing the number of Cr+6 ambient monitors to one. (Annual cost-saving ÷ 12 months = monthly cost-saving.)

### **Duplication**

The proposed amended rule does not impose the same requirements as any state or federal regulations. The amendment is necessary and proper to execute the powers and duties granted to, and imposed upon, SCAQMD.

### **Reference**

By adopting the proposed amended rule, the SCAQMD Board will be implementing, interpreting, and making specific the provisions of the California Health & Safety Code Sections 40000 (authority over non-vehicular sources), 40001 (rules to achieve ambient air quality standards), and 41700 (public nuisance).

### **Comparative Analysis**

Health and Safety Code §§40727.2 requires a written analysis comparing a proposed rule or amendment with existing federal, State and District regulations. Health and Safety Code §§40727.2, subsection (c) and (d) further require the analysis to review averaging provisions, operating parameters, work practice requirements, and monitoring, reporting and recordkeeping requirements associated with existing applicable rules and proposed regulations. A comparative analysis for the adoption of Rule 1156 in 2005 was conducted and is included in Appendix B. The analysis was updated in conjunction with the Rule 1156 amendments in 2009 and is reflected in italics. Relative to the 2015 proposal, the comparative analysis in Appendix B has been further updated and the provisions are shown in bold and underline format.

### **Analysis of Alternative Control Measures**

Health and Safety Code Section 40440.5, subsection (c)(3) requires an analysis of alternative control measures if the proposed rule will significantly affect air quality or emissions limitations. Current proposed amendments to Rule 1156 are the result of a Governing Board directive relative to the previous 2009 amendments and do not significantly affect air quality or emissions limitations. Therefore, an analysis of alternatives is not required.

## **VII. CONCLUSION**

The proposed amendments address the Governing Board directive, as stated in the 2009 adoption Resolution, to re-assess the frequency of, or the need for, continued monitoring after five years of data or facility closure. The proposed amendments provide potential relief from monitoring through continued compliance with the Cr<sup>+6</sup> fence-line threshold requirements. The proposals also address facility closure with a sunset of Cr<sup>+6</sup> monitoring three months after completion of site clean-up/remediation. The proposed amendments would lower the ambient hexavalent chromium fence-line levels to reflect changes made by OEHHA to the risk assessment methodology.

**APPENDIX A**  
**RESPONSE TO COMMENTS**

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## PAR 1156 Comments/Responses

### SCAQMD's Authority

*Comment #1:* SCAQMD lacks legal authority to impose obligations on a “non-source”.

*Response #1:* While the statutes do not define the term “source”, and neither do district rules, the California Air Resources Board glossary defines “source” as any place or object from which air pollutants are released. It does not require any human activity to meet the definition. Moreover, the Air Resources Board definition of “area sources” includes “natural sources” which do not implicate any human activity ([www.arb.ca.gov/html/gloss.htm](http://www.arb.ca.gov/html/gloss.htm)). But in any event, the sources which SCAQMD seeks to regulate in PAR 1156 clearly have been affected by human activity (i.e., cement manufacturing), which causes the dirt or dust on the property to contain higher levels of hexavalent chromium (Cr<sup>+6</sup>). SCAQMD staff submits that property on which dirt or dust containing hexavalent chromium is located constitutes a “source” of air pollution because the dirt or dust may be picked up by the wind and blown outside the property lines where people can breathe it.

The California Court of Appeal upheld SCAQMD’s interpretation of “source” to include natural gas in a pipeline which ultimately would be combusted and create NOx emissions, even though there were no emissions from the gas as it sat in the pipeline. The court noted that it must liberally construe the terms in issue for the protection of public health, and the same principle would apply here. *Southern California Gas Co. v. South Coast Air Quality Management District* (2012) 200 Cal. App. 4<sup>th</sup> 251.

*Comment #2:* SCAQMD cannot regulate a person such as a subsequent landowner based on emissions which they did not generate, have no knowledge of or potentially cannot control.

*Response #2:* The District has authority to pass rules and regulations to prevent “air pollution episodes which, at intervals, cause discomfort or health risks to, or damage to the property of, a significant number of persons or class of persons.” H&S 40001(b). “By using this language, the Legislature clearly intended to vest AQMD with the authority to adopt preemptive measures designed to prevent air pollution episodes...” (*Ultramar, Inc. v. South Coast Air Quality Management Dist.* (1993) 17 Cal.App.4<sup>th</sup> 689, 707.) The property will continue to be a potential source of hexavalent chromium emissions after facility closure, regardless of who the owner is. The new owner of a post closure source has control over the property and is thus in the best position to minimize hexavalent chromium emissions from the property. (See *Preston v. Goldman* 42 Cal.3d 108, 125-126 (ownership and control are fundamental requirements for ascribing liability for conditions on the property)).



Notably, SCAQMD only proposes to require an owner of a property to monitor for hexavalent chromium ( $\text{Cr}^{+6}$ ) emissions and comply with the appropriate  $\text{Cr}^{+6}$  fence-line thresholds and compliance plan, as applicable, during reclamation or site clean-up/rehabilitation and for 3 months following the completion of these activities. These are reasonable regulations. The commenter fails to explain why the new owner would have no knowledge of the emissions or have “no ability to control” the emissions.

*Comment #3:* SCAQMD is regulating future owners of unrelated activities based solely on emissions and conduct by a former industrial operator.

*Response #3:* This is not correct. The rule is based on the current risk of dangerous emissions even after the cement operation is closed and the property is sold to a new owner or owners. The rule has also been clarified so that the rule ceases to apply if certain conditions are met after facility closure, as stated in subdivision (h). After facility closure, ambient monitoring in accordance with the most recent monitoring plan, schedule, and applicable threshold shall continue until both (1) and (2) are met:

- (1) Completed implementation of an approved reclamation plan by the lead agency; or completed clean-up/rehabilitation of the property with permanent stabilization measures and in compliance with SCAQMD Rules, including SCAQMD Rule 403 – Fugitive Dust during equipment dismantling or demolition and material removal; ~~and~~ or determination from the Executive Officer that no further action is required or the reclamation/clean-up/rehabilitation activities have been satisfactory completed; and
- (2) Subsequent three months of demonstrated compliance with the applicable  $\text{Cr}^{+6}$  thresholds after completion of reclamation/clean-up/rehabilitation or no further action determination.

In addition, a site-specific assessment may be submitted for approval so that areas that are not potentially contaminated can be excluded from the reclamation/clean-up/rehabilitation activities.

*Comment #4:* SCAQMD is requiring that a former permittee have perpetual access to land it has sold and that the rule requirements may have to be recorded to provide notice to future land owners and operators.

*Response #4:* The rule requirements are intended to apply to the current owner or operator, who must comply with the terms of the rule until the requirements are met. The rule is not intended to impose an obligation on a former permittee to have perpetual access to land it has sold. The rule has also been clarified so that the rule ceases to apply if certain conditions are met after facility closure, as stated in subdivision (h). After facility closure, ambient monitoring in accordance with the most

recent monitoring plan, schedule, and applicable threshold shall continue until both (1) and (2) are met:

- (1) Completed implementation of an approved reclamation plan by the lead agency; or completed clean-up/rehabilitation of the property with permanent stabilization measures and in compliance with SCAQMD Rules, including SCAQMD Rule 403 – Fugitive Dust during equipment dismantling or demolition and material removal; ~~and~~ or determination from the Executive Officer that no further action is required or the reclamation/clean-up/rehabilitation activities have been satisfactory completed; and
- (2) Subsequent three months of demonstrated compliance with the applicable Cr<sup>+6</sup> thresholds after completion of reclamation/clean-up/rehabilitation or no further action determination.

In addition, a site-specific assessment may be submitted for approval so that areas that are not potentially contaminated can be excluded from the reclamation/clean-up/rehabilitation activities.

Regarding recordation, nothing in this rule requires a current owner or operator to record any notice of the rule requirements on the property deed. Health & Safety Code Section 25359.7 already requires an owner of non-residential real property who knows or has reasonable cause to believe that a release of hazardous substance is located on the property to provide written notice of such condition to a buyer, lessee, or renter of the property prior to the sale, lease or rental of the property. As such, any future owner or operator who conducts due diligence will have notice of the rule requirements. As recommended, the specific provisions applicable only to the operations relating to the manufacture of cement are specifically called out. Specifically, those provisions of the rule via subdivision headings have the phrase “at a cement manufacturing facility” added.

*Comment #5:* As a part of their comment letters, both facilities provided information regarding actions required by other agencies relative to post facility closure and actions required before repurposing of the property for other uses. These include a reclamation plan by the lead agency regarding mining and other city/county over-site requirements regarding demolition and site clean-up of the property prior to reuse, as well as the CEQA process for future land use activities.

*Response #5:* As noted in the prior comment relative to subdivision (h), information received from the facilities contributed to the modified rule language regarding facility closure and sunset of the rule provisions once clean-up and stabilization have occurred, as well as three months of compliant monitoring data after the activities have been completed.

*Comment #6:* Open-ended monitoring is well beyond SCAQMD authority especially once a facility is no longer an operating cement plant.

*Response #6:* See Response #1. Nevertheless, the rule has been clarified so that the rule ceases to apply if certain conditions are met after facility closure, as stated in subdivision (h).

*Comment #7:* SCAQMD has no jurisdiction over land use issues and other agencies have jurisdiction over land use and development of the site.

*Response #7:* The proposed rule requirements are specifically designed to protect public health and are not land use requirements. SCAQMD's proposed rule does not prohibit any kind land use or dictate how the site must be developed. The rule has been clarified so that the rule ceases to apply once reclamation or site clean-up is completed and subsequent three months of compliance with the applicable hex chrome threshold, as provided in subdivision (h) of the rule.

### **Hexavalent Chromium Monitoring**

*Comment #1:* Monitoring after closure is unnecessary because SCAQMD maintains its regional monitoring network.

*Response #1:* Regional monitoring does not detect localized levels of air toxics which are the concern here.

*Comment #2:* PAR 1156 requires access for siting of SCAQMD monitoring equipment on the former cement plant property. This is a taking without due process of law.

*Response #2:* SCAQMD has removed this provision.

### **New Cr<sup>+6</sup> Fence-line Threshold and Background**

*Comment #1:* The commenter's facility may not be able to comply with the new 0.2 ng/um<sup>3</sup> standard. If the facility is forced to close its operation, that "can" constitute an unlawful taking.

*Response #1:* The commenter fails to explain why they cannot meet the new standard. Just because there have been exceedances of this level in the past does not mean the facility cannot install additional precautionary measures to achieve this standard. But if the facility is forced to close its cement operations, normally that does not constitute a "taking" since the rule would not deprive the facility of all reasonable use of the property, and there is a reasonable health-based rationale for the fence-line limit. If the facility can demonstrate that it could not meet the proposed new limit, staff can assist with evaluating alternative control measures feasible to reduce Cr<sup>+6</sup> emissions. However, with the newly proposed Cr<sup>+6</sup> background levels derived from the 90 percentile data for the Rubidoux/Fontana area (a 30-day rolling average of 0.062 ng/m<sup>3</sup> for the 1-in-3 sampling schedule and a 90-day rolling average of 0.056 ng/m<sup>3</sup>

for the 1-in-6 sampling schedule), staff believes that the facility can comply with the new Cr<sup>+6</sup> fence-line threshold, assuming that feasible control measures are taken. Staff is willing to work with the facility in this regard.

*Comment #2:* SCAQMD should not modify the fence-line limit before CARB guidance documents have been approved.

*Response #2:* The revised fence-line limit merely applies OEHHA-approved methods to establishing an approximate equivalent to the 100 in a million risk which was the basis for the previous fence-line limit. Nothing in CARB's guidance document is inconsistent with this approach.

*Comment #3:* The proposed limit presents a risk of facility closure which will cause adverse environmental as well as economic impacts.

*Response #3:* The commenter has not presented any evidence from which to conclude that it cannot meet the newly-proposed limit, which provides equivalent health protection to the original limit. Any economic or environmental impacts of compliance methods, if identified to SCAQMD, will be analyzed in the CEQA and socioeconomic assessments.

*Comment #4:* SCAQMD uses wrong background limit that does not accurately reflect the immediate area around the commenter's facility. In addition, if the standard for compliance is based on a 30-day or 90-day rolling average then the background should be based on a similar average.

*Response #4:* The previously proposed Cr<sup>+6</sup> background level of 0.043 ng/m<sup>3</sup> observed at Fontana and Rubidoux was the sub-regional annual average background applicable to the proximity of the two cement manufacturing facilities. However, SCAQMD staff concurs that two different Cr<sup>+6</sup> background levels applicable to the proximity of RC and CPCC for two different sampling schedules is appropriate. Using the 90<sup>th</sup> percentile data, staff now proposes the 30-day rolling average Cr<sup>+6</sup> background concentration for a 1-in-3 sampling schedule would be 0.062 ng/m<sup>3</sup>, and the 90-day rolling average Cr<sup>+6</sup> background concentration for a 1-in-6 sampling schedule would be 0.056 ng/m<sup>3</sup>. These background levels will be used for Rule 1156 compliance purposes. Therefore, the proposed new effective limits would be 0.262 ng/m<sup>3</sup> and 0.256 ng/m<sup>3</sup>, respectively.

SCAQMD staff does not believe that monitoring data from the immediate area around the facilities should be used to derive background because it is unduly influenced by facility emissions and not truly background

*Comment#5:* There are no residential receptors at the fence-line and the majority of receptors in the area is light industrial.

*Response #5:* The fence-line risk is driven by residential exposure. Specifically, such a development is across a two-lane road from one facility's property boundary.

*Comment #6:* Using a 70 year or 30 year exposure limits is a mismatched compliance standard compared to the monitoring data which is generated on a 90-day rolling average.

*Response #6:* These are two separate issues: an appropriate health-protective standard assuming the appropriate OEHHA approved exposure assumptions, and a proper measure of meeting that limit. To derive the limit, staff properly uses the OEHHA approved exposure assumptions, as is done for all other programs including permitting, CEQA, and AB2588. To decide whether the facility is meeting that limit, staff use the monitoring data which, in this case, is the 90-day rolling average, since both facilities are in their 1-in-6 day sampling schedule pursuant to existing rule requirements.

**Miscellaneous**

*Comment #1:* The rule should be “void for vagueness” because a person cannot tell what provisions it must comply with under the sections that require compliance with other agency requirements and mitigations. Also a person may be faced with multiple agencies (i.e., DTSC, CA Water Board, and EPA) interpreting the same requirement differently.

*Response #1:* SCAQMD has removed the provisions requiring compliance with other agencies’ rules and regulations, including CEQA requirements. .

*Comment #2:* SCAQMD is improperly extending the rule to cover air toxics without CEQA review.

*Response #2:* The current rule version already aims for minimizing Cr<sup>+6</sup> emissions, which is a toxic air contaminant. SCAQMD staff is revising the CEQA document for the proposed amendments to cover any impacts of lowering the hexavalent chromium monitoring threshold.

*Comment #3:* The rule is unclear as to which obligations apply to the current permittee and which requirements apply to future landowners. By imposing all obligations on all categories of “owners/operators” at the same time, the rule is vague and unworkable.

*Response #3:* SCAQMD staff has revised the language to clearly specify requirements for owner(s)/operator(s) of a current cement manufacturing facility and owner(s)/operator(s) of a property after facility closure.

*Comment #4:* There may be large laboratory errors in SCAQMD’s data and the data may not be able to be duplicated by independent third party labs.

*Response #4:* In a recent collaborative effort between the SCAQMD lab, both affected facilities, and one facility’s third party lab, it was found that there were no notable differences in the laboratory results when analyzing samples. Efforts continue to evaluate monitoring itself to identify any potential discrepancies.

*Comment #5:* Staff fails to consider other possible sources of hexavalent chromium in the area such as other industrial activity and railroads.

*Response#5:* Other nearby industrial activities and railroads would contribute to the Cr<sup>+6</sup> background levels observed at the Fontana-Rubidoux stations. Staff also added a provision in the proposed rule that a Cr<sup>+6</sup> exceedance will be confirmed and verified with wind data and/or relevant data to determine the real source of the exceedance.

*Comment #6:* The Mancuso manuscript which appears to be the basis for OEHHA's unit risk factor is obscure and cannot be found. The study must be made available.

*Response #6:* Staff will try to obtain a copy from the OEHHA for reference.

*Comment #7:* The OEHHA inhalation risk factor is based on a workplace cohort and may not be "directly applicable" here. Also, the Glaser study was on rats and it seems likely that a greater percent of particles were in the respirable range than would occur with hexavalent chromium originating from cement manufacturing. The rats may have been exposed to greater amounts of chromium because they groom themselves and one another and may have ingested chrome. The chrome from cement plants is likely contained within the "complex chemical and structural matrix" of cement and may be less available for contact with deep respiratory tract tissues.

*Response #7:* SCAQMD uses the inhalation risk factors and follows the risk assessment guidelines developed by OEHHA in estimating potential health effects of toxic air contaminants. These risk factors, as developed by OEHHA, are applicable to the population residing in the South Coast Air Basin.

*Comment #8:* SCAQMD cannot make a finding of "necessity" simply by creating a new standard and then saying it is necessary to meet that standard. SCAQMD cannot make findings of authority or clarity, for reasons previously stated. SCAQMD cannot make findings of "consistency" and "non-duplication" because it may be using an approach different from that used for AB2588, and because other state and federal agencies can regulate chromium-impacted soils.

*Response #8:* SCAQMD is not setting a new standard. The standard is under 100 in a million at the fence-line, and the proposed amended rule merely sets a new limit to meet that same standard based on OEHHA's recently-approved guidance. In any event, the standard is justified because SCAQMD has previously determined that 100 in a million is an unacceptable level of risk under the AB 2588 program, as specified in Rule 1402. Staff has previously responded to the "authority" issue. Staff has revised the rule to improve its clarity. The approach is not different from that used in AB2588. Finally, although other agencies may impose requirements to regulate chromium impacted soils, the commenter has not presented any argument that any such regulation preempts SCAQMD requirements which are specifically designed to protect public health. Rule 403 may overlap with respect to some operations, but it does not require monitoring for hexavalent chromium,

and does not focus on emissions of toxic air contaminants, which may require more rigorous control activities than those required under Rule 403.

**Specific Rule Language Recommendations**

SCAQMD staff has received proposed language submitted by each of the cement manufacturing facilities regarding the proposed amendments. Copy of the suggest language resides in the SCAQMD administrative record, and a summary of the suggested language and intent is summarized as follows:

*Comment #1:* Suggested modifications regarding the purpose and applicability of Rule 1156 as it pertains to facility closure.

*Response #1:* Staff modified the rule purpose and applicability to clarify that after facility closure, the rule is also applicable to owner(s)/operator(s) of the property on which the cement manufacturing facility has operated on or after November 4, 2005. Suggestions regarding what constitutes closure was not included in these subdivision, rather it has been clarified in the new definition of “facility closure” and the definition of “owner/operator.”

*Comment #2:* Suggested edits to the definitions of “facility closure” and “owner/operator” relative to the applicability after facility closure. Also, suggested language regarding the approval of proposed modifications to existing compliance monitoring plans.

*Response #2:* Staff revised the definition of “facility closure” so that closure occurs when all on-site cement manufacturing operations have completely ceased and all equipment permits associated with those operations (i.e., blending silos, kilns, clinker cooler, and clinker grinding/milling) are surrendered, or have expired and no longer reinstatable.

The definition of “owner/operator” was revised to specify current owner/operator of the cement manufacturing facility, and upon facility closure, owner/operator of the property on which the cement manufacturing facility has operated on or after November 4, 2005.

Clause (d)(11)(A)(iii) was revised to allow for potential modification of current compliance monitoring plan upon a subsequent 12 consecutive months of compliance with the appropriate Cr<sup>+6</sup> thresholds (0.70 ng/m<sup>3</sup> and/or 0.20 ng/m<sup>3</sup>, excluding background). If such request is approved, the owner/operator may reduce the number of monitoring stations to a minimum of one and place it downwind from the emission source(s). Rule language was also revised per comment so that upon any confirmed exceedance of Cr<sup>+6</sup> thresholds, the owner/operator must, within 14 days of SCAQMD’s notice, revert back to the most recently approved compliance plan which includes a minimum of three (3) monitoring stations.

- Comment #3:* It should be made clear in the requirements and subsequent sections those provisions that apply only to cement manufacturing operations.
- Response #3:* SCAQMD staff concurs and the applicable subdivision titles in the rule have the added phrase "...at a cement manufacturing facility".
- Comment #4:* Language clarifying that any exceedance of the fence-line hexavalent chromium threshold should be conclusively due to the facility.
- Response #4:* Language was added to clause (d)(11)(A) (ii) to state that wind event and/or other relevant data will be utilized by the Executive Officer, as necessary, to determine the actual source of the exceedance of Cr<sup>+6</sup> fence-line threshold.
- Comment #5:* Suggested additional language that would not require compliance for an exceedance of the fence-line threshold if due to circumstances deemed out of their control.
- Response #5:* Since a compliance plan detailing all feasible control measures being utilized or will be utilized is very essential to demonstrate increments of progress upon a Cr<sup>+6</sup> exceedance, and the reversion to previous monitoring schedule and requirement is crucial to ensure protection of public health, staff did not remove those provisions. Instead, staff added language so that owner/operator is only responsible for any confirmed Cr<sup>+6</sup> exceedance caused by their facility's operations/activities.
- Comment #6:* Suggested modifications to language regarding facility closure as it pertains to a facility closure protocol relative to ownership and exit report that would sunset all rule requirements. Suggestions were also made as to limitation of the rule relative to concerns of duplication of other regulatory requirements and that additional monitoring of the site is unnecessary if proper fugitive dust controls under existing regulations are implemented.
- Response #6:* SCAQMD staff has taken the commenter's suggestions into consideration and has modified the provisions to create a point at which the rule would cease to apply to the owner/operator of a property where cement manufacturing had occurred. Specifically, Subdivision (h) was modified to require owner(s)/operator(s) of the property on which a cement manufacturing facility has operated on or after November 4, 2005, to continue their Cr<sup>+6</sup> ambient monitoring in accordance with the most recent monitoring plan, schedule, and threshold until both (1) and (2) are met:
- (1) Completed implementation of an approved reclamation plan by the lead agency; or completed clean-up/rehabilitation of the property with permanent stabilization measures and in compliance with SCAQMD Rules, including SCAQMD Rule 403 – Fugitive Dust during equipment dismantling or demolition and material removal; ~~and/or~~ and/or determination from the Executive Officer that no further



action is required or the reclamation/clean-up/rehabilitation activities have been satisfactory completed; and

- (2) Subsequent three months of demonstrated compliance with the applicable  $\text{Cr}^{+6}$  thresholds after completion of reclamation/clean-up/rehabilitation or no further action determination.

In addition, a site-specific assessment may be submitted for approval so that areas that are not potentially contaminated can be excluded from the reclamation/clean-up/rehabilitation activities.

**APPENDIX B**

**COMPARATIVE ANALYSIS**

**Comparison of PAR 1156 and Other Requirements for Cement Manufacturing**

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**Appendix B - Comparison Between PR1156 and Other Requirements for Cement Manufacturing**

Note: For comparison purposes, Rule 1156 amendments made in 2009 are reflected in *italics* format. Proposed amendments for 2015 are in **bold underline and highlighted**.

RULE 1156	SCAQMD RULE 1112.1	NSPS -- 40CFR PART 60 SUBPART F	NESHAP -- 40 CFR PART 63 SUBPART LLL	COMPLIANCE ASSURANCE MONITORING 40CFR PART 64
<b>APPLICABILITY</b>				
<p>Equipment/Operation:</p> <p>Kiln, clinker cooler, raw mill system, finish mill system, raw mill dryer, raw material storage, clinker storage, conveyor transfer points, bagging, bulk loading and unloading systems; and operations that generate fugitive dusts.</p>	<p><u>Equipment/Operation:</u></p> <p>Cement kiln and clinker cooler for dry-process manufacturing of gray cement.</p>	<p><u>Equipment/Operation:</u></p> <p>Kiln, clinker cooler, raw mill system, finish mill system, raw mill dryer, raw material storage, clinker storage, conveyor transfer points, bagging and bulk loading and unloading systems</p> <ul style="list-style-type: none"> <li>• Equipment constructed or modified after 7/17/1971.</li> </ul>	<p>Facility is a major source or area source of air toxics;</p> <p><u>Equipment/Operation:</u></p> <p>Kiln, clinker cooler, raw mill system, finish mill system, raw mill dryer, raw material storage, clinker storage, conveyor transfer points, bagging and bulk loading and unloading systems</p> <ul style="list-style-type: none"> <li>• Existing equipment or equipment constructed or reconstructed after 9/11/1998.</li> </ul>	<p>Equipment that:</p> <ul style="list-style-type: none"> <li>• is subject to emission standard (e.g. SIP approved rules but not 40 CFR Part 60 or Part 63 rules);</li> <li>• uses a control device, and</li> <li>• 3) has pre-control emissions that are equal to or more than the major source level (e.g. 70 tpy PM10)</li> </ul>

RULE 1156	SCAQMD RULE 1112.1	NSPS -- 40CFR PART 60 SUBPART F	NESHAP -- 40 CFR PART 63 SUBPART LLL	COMPLIANCE ASSURANCE MONITORING 40CFR PART 64
<b>COMPLIANCE DATE</b>				
<p>By December 2006. Facility Emissions: Reduce 2003 baseline emissions by 50% by 2006.</p> <p><i>Clinker Material Storage</i> <i>Enclosure or alternatives:</i> <i>6 months from date of adoption</i></p> <p><i>Monitoring Requirements</i> <i>Wind: 6 months from date of adoption.</i> <i>Cr<sup>+6</sup>: 6 months from date plan approval or 3/1/10, whichever occurs earlier.</i></p> <p><b>Effective September 5, 2016 fence-line limit of 0.2 ng/m<sup>3</sup></b></p> <p><i>PM10 (if applicable):</i> <i>6 months from date plan or 12 months from date of third confirmed violation, whichever occurs first.</i></p>	<p>On and after February 1986.</p>	<p>On or after completion of the initial performance test.</p>	<ul style="list-style-type: none"> <li>• For existing equipment: 6/14/2002</li> <li>• For new or modified equipment: Upon startup</li> </ul>	<p>If the Title V application is complete before 4/20/1998, a CAM plan is due as part of the application for the Title V permit renewal, or as part of the application for a significant permit revision.</p>

RULE 1156	SCAQMD RULE 1112.1	NSPS -- 40CFR PART 60 SUBPART F	NESHAP -- 40 CFR PART 63 SUBPART LLL	COMPLIANCE ASSURANCE MONITORING 40CFR PART 64
<b>PERFORMANCE STANDARDS</b>				
<p>All Equipment: Opacity ≤ 10%</p> <p>Kilns and Clinker Coolers: PM10 ≤ 0.05 lb/ton clinker</p> <p>All Baghouses: Outlet concentration ≤ 0.005 grain/dscf ; or 99.5% capture efficiency and 99.5% collecting efficiency</p> <p>Other Equipment</p> <ul style="list-style-type: none"> <li>• Opacity ≤ 10% process equipment via method 9</li> <li>• Opacity &lt; 20% open piles &amp; roadways via method 9B</li> <li>• Visible emissions not to exceed 100 ft. plume in any direction</li> </ul> <p>Other Requirements</p> <ul style="list-style-type: none"> <li>• Enclosed storage piles,</li> </ul>	<p><u>Kilns and Clinker Coolers Combined</u></p> <ul style="list-style-type: none"> <li>• PM ≤ 0.4 lb/ton feed when kiln feed rates &lt;75 ton/hr</li> <li>• PM ≤ 30 lb/hr when kiln feed rates &gt;75 ton/hr</li> </ul>	<p><u>Kilns</u></p> <ul style="list-style-type: none"> <li>• PM ≤ 0.3 lb/ton feed dry basis</li> <li>• Opacity ≤ 20%</li> </ul> <p><u>Clinker Coolers</u></p> <ul style="list-style-type: none"> <li>• PM ≤ 0.1 lb/ton feed dry basis</li> <li>• Opacity ≤ 10%</li> </ul> <p><u>Other Equipment</u></p> <p>Opacity ≤ 10%</p>	<p><u>Kilns:</u></p> <ul style="list-style-type: none"> <li>• PM ≤ 0.3 lb/ton feed dry basis</li> <li>• Opacity ≤ 20%</li> </ul> <p><u>Clinker Coolers</u></p> <ul style="list-style-type: none"> <li>• PM ≤ 0.3 lb/ton feed dry basis</li> <li>• Opacity ≤ 10%</li> </ul> <p><u>Other Equipment</u></p> <p>Opacity ≤ 10%</p> <p><u>Other Requirements</u></p> <p>THC &lt; 50 ppmvd as propane corrected to 7% oxygen</p> <p>D/F &lt; 8.7 x 10<sup>-11</sup> grain/dscf corrected to 7% oxygen</p>	<p>Not specified performance standards.</p>

RULE 1156	SCAQMD RULE 1112.1	NSPS -- 40CFR PART 60 SUBPART F	NESHAP -- 40 CFR PART 63 SUBPART LLL	COMPLIANCE ASSURANCE MONITORING 40CFR PART 64
<p>crushers, screens, mills, conveying systems, and other equipment.</p> <ul style="list-style-type: none"> <li>• Pave roads, use chemical dust suppressants, limit vehicle speed, street sweeping, and facility cleanup.</li> <li>• <i>Enclose clinker material storage and handling; alternatively, tarp/wind fence if &gt;1,000 feet from property line.</i></li> </ul> <p><i>Monitoring</i></p> <ul style="list-style-type: none"> <li>• <i>Wind gusts &gt;25 mph: shutdown of material handling.</i></li> <li>• <i>Cr<sup>+6</sup> 30-day or 90-day rolling average, as applicable, shall not exceed 0.7 ng/m<sup>3</sup>. <b>0.2 ng/m<sup>3</sup> beginning September 5, 2016.</b></i></li> <li>• <i>PM10 monitoring, if applicable, shall require dust control activities if 3 NOV's for upwind/downwind concentration exceeding 50 µg/m<sup>3</sup>.</i></li> </ul>				

RULE 1156	SCAQMD RULE 1112.1	NSPS -- 40CFR PART 60 SUBPART F	NESHAP -- 40 CFR PART 63 SUBPART LLL	COMPLIANCE ASSURANCE MONITORING 40CFR PART 64
<b>MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS</b>				
<ul style="list-style-type: none"> <li>• Annual source testing for kilns and clinker coolers</li> <li>• Source test at least 10 equipment vented to baghouses which are in the top 20% PM10 emitters at the facility.</li> <li>• Monitor operating parameters of baghouses such as flue gas flow rates and pressure drop across filters.</li> <li>• Keep all records to demonstrate compliance for at least 5 years.</li> <li>• Report annual emissions for all process equipment, open storage piles and vehicle traffic.</li> <li>• Source Test Methods: AQMD Method 5.1, 5.2, 5.3 or EPA Method 5 modified; or EPA Method 201A and 202 for PM10.</li> </ul>	<p>Not specify.</p>	<ul style="list-style-type: none"> <li>• Continuous opacity monitoring for kilns and clinker coolers and any bypass</li> <li>• Record visible emissions at least three 6-minute periods each day, and records maintained for 2 years.</li> <li>• Record daily production rates and kiln feed rates</li> <li>• Initial performance test is required to be conducted.</li> <li>• Excess emissions must be reported semi – annually.</li> <li>• Malfunctions must be reported.</li> <li>• Semiannual report of</li> </ul>	<ul style="list-style-type: none"> <li>• Initial performance test is required to determine compliance with the emission limitation and to establish the operating limits</li> <li>• Performance test is required every 30 months – 5years</li> <li>• Source Test Methods: EPA Method 5 for PM and Method 9 for opacity.</li> </ul>	<p>A CAM plan accompanying a Title V permit must:</p> <ul style="list-style-type: none"> <li>• Describe indicators to be monitored;</li> <li>• Describe indicators' ranges;</li> <li>• Describe performance criteria for monitoring;</li> <li>• Provide justification for the use of the indicators, ranges, and monitoring approach;</li> <li>• Provide emission test data, if necessary; and</li> <li>• Provide an implementation plan.</li> </ul> <p>A Title V permit must:</p> <ul style="list-style-type: none"> <li>• Include approved monitoring approach,</li> <li>• Have specific definitions of exceedence or excursion;</li> <li>• Include reporting and recordkeeping requirements; and</li> <li>• Indicate if source testing is required.</li> </ul>

RULE 1156	SCAQMD RULE 1112.1	NSPS -- 40CFR PART 60 SUBPART F	NESHAP -- 40 CFR PART 63 SUBPART LLL	COMPLIANCE ASSURANCE MONITORING 40CFR PART 64
<ul style="list-style-type: none"> <li>• <i>Submit compliance plan 3-months from date of adoption.</i></li> <li>• <i>Keep records relative to monitoring and use of exemptions.</i></li> <li>• <i>Report monitoring data monthly.</i></li> <li>• <b>Upon 12 months of compliant monitoring date from (date of adoption), facility may reduce to one monitor in principally down-wind areas.</b></li> <li>• <b>After site remediation and/or clean up efforts are completed, monitoring may cease after 3 months.</b></li> </ul>		<p>excess emissions and malfunctions</p> <ul style="list-style-type: none"> <li>• Source Test Methods:</li> <li>• EPA Method 5 for PM and Method 9 for opacity.</li> </ul>		<p>Source Test Methods: Not specified.</p>



# ATTACHMENT G

## SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

### Final Environmental Assessment:

### Proposed Amended Rule 1156 – Further Reductions of Particulate Emissions from Cement Manufacturing Facilities

August 2015

SCAQMD No. 150623JI

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## PREFACE

This document constitutes the Final Environmental Assessment (EA) for Proposed Amended Rule 1156 – Further Reductions of Particulate Emissions from Cement Manufacturing Facilities. The Draft EA was released for a 30-day public review and comment period from July 21, 2015 to August 15, 2015. No comment letters on the Draft EA were received during the public comment period. The environmental analysis in the Draft EA concluded that Proposed Amended Rule 1156 would not generate any significant adverse environmental impacts.

Minor modifications were made to the proposed amended rule subsequent to release of the Draft EA for public review. To facilitate identifying modifications to the Draft EA, added and/or modified text is underlined. Some of these rule modifications include: the elimination of a dust mitigation plan submittal prior to land disturbing activities; the extension of the effective date of the ambient hexavalent chromium fenceline standard; if exceeding the fenceline standard, the facility would not have to submit a compliance plan if it is required to submit, or has an approved health risk assessment under Rule 1402; and streamlined requirements relative to cessation of hexavalent chromium monitoring after facility closure. Staff has reviewed these minor rule modifications and concluded that they do not cause any CEQA impacts to be substantially worse or change any conclusions reached in the Draft EA. By analyzing the more stringent requirements of the previous version of the proposed amended rule, the Draft EA evaluated a “worst-case” impact scenario. Therefore, any potential adverse impacts from the currently proposed project are expected to be less than the potential adverse impacts evaluated in the Draft EA. As a result, these minor revisions do not require recirculation of the document pursuant to CEQA Guidelines §15088.5. Therefore, this document now constitutes the Final EA for Proposed Amended Rule 1156.

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## CHAPTER 1 - PROJECT DESCRIPTION

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**Introduction**

**Affected Facilities**

**California Environmental Quality Act**

**Project Location**

**Project Objective**

**Project Background**

**Cement Manufacturing Overview**

**Project Description**

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## *Final Environmental Assessment: Chapter 1*

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### **INTRODUCTION**

The California Legislature created the South Coast Air Quality Management District (SCAQMD) in 1977<sup>1</sup> as the agency responsible for developing and enforcing air pollution control rules and regulations in the South Coast Air Basin (Basin) and portions of the Salton Sea Air Basin and Mojave Desert Air Basin referred to herein as the District. By statute, the SCAQMD is required to adopt an air quality management plan (AQMP) demonstrating compliance with all federal and state ambient air quality standards for the District<sup>2</sup>. Furthermore, the SCAQMD must adopt rules and regulations that carry out the AQMP<sup>3</sup>. The Final 2012 AQMP concluded that reductions in emissions of particulate matter (PM), oxides of sulfur (SOx), oxides of nitrogen (NOx), and volatile organic compounds (VOC) are necessary to attain the current state and national ambient air quality standards for ozone, and particulate matter with an aerodynamic diameter of 2.5 microns or less (PM2.5). Ozone, a criteria pollutant which has been shown to adversely affect human health, is formed when VOCs react with NOx in the atmosphere. VOCs, NOx, SOx (especially sulfur dioxide) and ammonia also contribute to the formation of PM10 and PM2.5.

The Basin is designated by the United States Environmental Protection Agency (EPA) as a non-attainment area for ozone and PM2.5 emissions because the federal ozone standard and the 2006 PM2.5 standard have been exceeded. For this reason, the SCAQMD is required to evaluate all feasible control measures in order to reduce direct ozone and PM2.5 emissions, including PM2.5 precursors, such as NOx and SOx. The Final 2012 AQMP sets forth a comprehensive program for the Basin to comply with the federal 24-hour PM2.5 air quality standard, satisfy the planning requirements of the federal Clean Air Act, and provide an update to the Basin's commitments towards meeting the federal 8-hour ozone standard. In particular, the Final 2012 AQMP contains a multi-pollutant control strategy to achieve attainment with the federal 24-hour PM2.5 air quality standard with direct PM2.5 and NOx reductions identified as the two most effective tools in reaching attainment with the PM2.5 standard. The 2012 AQMP also serves to satisfy the recent requirements promulgated by the EPA for a new attainment demonstration of the revoked 1-hour ozone standard, as well as to provide additional measures to partially fulfill long-term reduction obligations under the 2007 8-hour Ozone State Implementation Plan (SIP).

In addition to regulating criteria pollutants, state law specifies that air districts may regulate Toxic Air Contaminants (TACs). Specifically, Health and Safety Code §39656, California legislature has delegated the air districts, including the SCAQMD, to establish and implement a program to regulate TACs. Similarly, SCAQMD implements the Air Toxics Hot Spots Act (Health and Safety Code §44330) through Rule 1402.

To address potential air quality impacts and exposure to hexavalent chromium (Cr<sup>+6</sup>) after the closure of cement manufacturing facilities, and to ensure long-term air quality and protection, the SCAQMD is proposing revisions to Rule 1156. The currently proposed amendments include requirements for owners/operators of the affected property before and after facility closure, as well as conditions for potential reduction in the number of Cr<sup>+6</sup> monitoring stations, including the elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions.

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<sup>1</sup> The Lewis-Presley Air Quality Management Act, 1976 Cal. Stats., ch 324 (codified at Health and Safety Code, §§40400-40540).

<sup>2</sup> Health and Safety Code, §40460 (a).

<sup>3</sup> Health and Safety Code, §40440 (a).

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## *Final Environmental Assessment: Chapter 1*

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The proposed amendments would also revise the Cr<sup>+6</sup> ambient air monitoring fence-line threshold as a result of the 2015 update to the Office of Environmental Health Hazard Assessment's (OEHHA) risk assessment guidelines. On June 5, 2015, the SCAQMD Governing Board amended the District's primary rules addressing toxic emissions (e.g. Rules 1401, 1401.1, 1402 and 212) to take into account the new OEHHA guidelines. This proposed amendment will ensure that PAR 1156 uses a risk assessment methodology that is consistent with the District's primary toxic rules. The new guidelines apply age sensitivity factors and multiple pathways of exposure, in addition to inhalation and cancer risk estimates to residential and sensitive receptors. Assuming a constant level of monitored Cr<sup>+6</sup>, the new OEHHA guidelines yield an approximately 3.87-fold increase in residential cancer risk in comparison to the previous guidelines.

The proposed amendments would therefore change the fence-line Cr<sup>+6</sup> ambient air limit from 0.7 ng/m<sup>3</sup> to 0.20 ng/m<sup>3</sup> (both levels are excluding background). The Cr<sup>+6</sup> ambient air monitoring background is currently 0.043 ng/m<sup>3</sup>, based on the average background concentrations observed at the Fontana and Rubidoux stations as part of the fourth Multiple Air Toxics Emissions Study (MATES IV). With this background level, the new effective limit for Cr<sup>+6</sup> will be 0.243 ng/m<sup>3</sup>. PAR 1156 also proposes an implementation schedule for the new fence-line limit phase-in.

PAR 1156 development is the result of a March 2009 Rule 1156 amendment Resolution in which the SCAQMD Governing Board directed staff to re-evaluate the need for, and the frequency of, Cr<sup>+6</sup> ambient monitoring after five years of data collection, and to establish a working group to develop a Facility Closure Air Quality Plan Option (Closure Plan).

### **AFFECTED FACILITIES**

Rule 1156 requires cement manufacturing facilities to comply with specific requirements applicable to various operations, as well as materials handling and transport at the facilities. Riverside Cement (RC) in Riverside and California Portland Cement Company (CPCC) in Colton are the two cement manufacturing facilities in the SCAQMD's jurisdiction subject to Rule 1156. Currently, both cement manufacturing facilities are non-operational regarding clinker production. RC and CPCC only process clinker or cement material imported from facilities outside the SCAQMD's jurisdiction.

### **CALIFORNIA ENVIRONMENTAL QUALITY ACT**

PAR 1156 – Further Reductions of Particulate Emissions from Cement Manufacturing Facilities, is a discretionary action by a public agency, which has potential for resulting in direct or indirect changes to the environment and, therefore, is considered a “project” as defined by the California Environmental Quality Act (CEQA). SCAQMD is the lead agency for the proposed project and has prepared this final environmental assessment (EA) with no significant adverse impacts pursuant to its Certified Regulatory Program and SCAQMD Rule 110. California Public Resources Code §21080.5 allows public agencies with regulatory programs to prepare a plan or other written document in lieu of an environmental impact report or negative declaration once the Secretary of the Resources Agency has certified the regulatory program. SCAQMD's regulatory program was certified by the Secretary of the Resources Agency on March 1, 1989, and is codified as SCAQMD Rule 110.

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## *Final Environmental Assessment: Chapter 1*

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CEQA and Rule 110 require that potential adverse environmental impacts of proposed projects be evaluated and that feasible methods to reduce or avoid significant adverse environmental impacts of these projects be identified. To fulfill the purpose and intent of CEQA, the SCAQMD has prepared this final EA to address the potential adverse environmental impacts associated with the proposed project. The final EA is a public disclosure document intended to: (a) provide the lead agency, responsible agencies, decision makers and the general public with information on the environmental effects of the proposed project; and, (b) be used as a tool by decision makers to facilitate decision making on the proposed project.

SCAQMD's review of the proposed project shows that the proposed project would not have a significant adverse effect on the environment. Therefore, pursuant to CEQA Guidelines §15252 and 15126.6(f), no alternatives are proposed to avoid or reduce any significant effects because there are no significant adverse impacts, and pursuant to CEQA Guidelines §15126.4(a)(3), mitigation measures are not required for effects not found to be significant. The analysis in the form of the environmental checklist in Chapter 2 supports the conclusion of no significant adverse environmental impacts.

~~Comments received on the draft EA during the public comment period and responses to comments will be prepared and included in the Final EA for the proposed project.~~

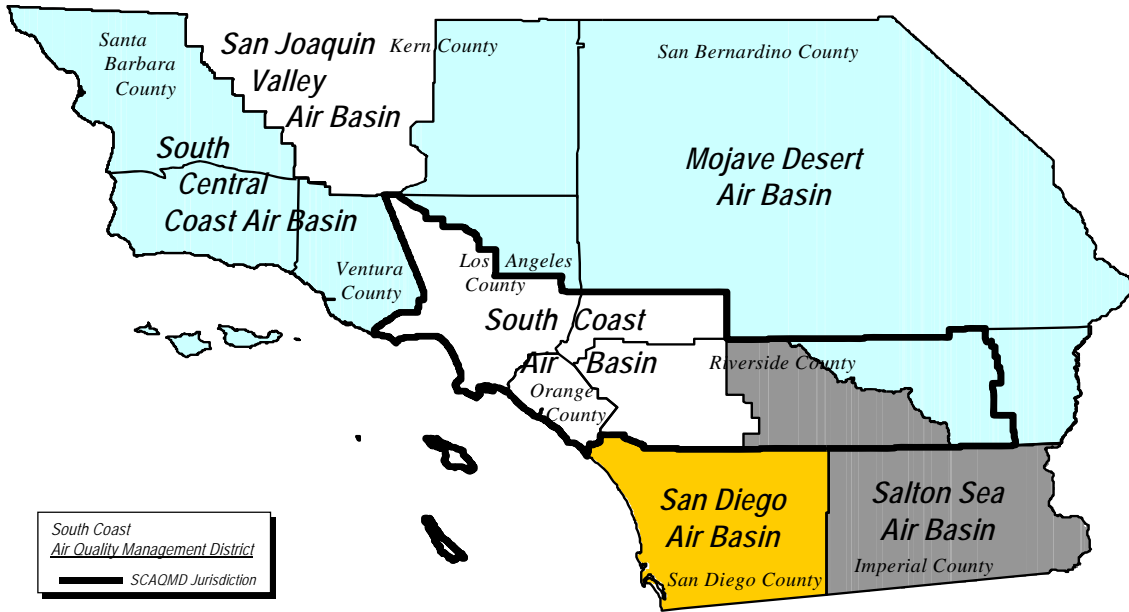
No comments were received on the draft EA during the public comment period.

### **PROJECT LOCATION**

The potentially affected facilities are located within the SCAQMD jurisdiction. The SCAQMD has jurisdiction over an area of approximately 10,743 square miles, consisting of the four-county South Coast Air Basin (Basin) (Orange County and the non-desert portions of Los Angeles, Riverside and San Bernardino counties), and the Riverside County portions of the Salton Sea Air Basin (SSAB) and Mojave Desert Air Basin (MDAB) (Figure 1-1).



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**Figure 1-1**  
**Boundaries of the South Coast Air Quality Management District**

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## **PROJECT OBJECTIVE**

The objectives of the PAR 1156 are to:

- provide a mechanism for reduction of Cr<sup>+6</sup> monitoring requirements for existing facilities based on monitored data or a cessation of monitoring upon facility closure;
- revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the new OEHHA risk assessment guidelines;
- revise the criteria used to validate duplicate PM samples; and
- add provisions for a dust mitigation plan prior to land disturbing activities occurring on the property after facility closure.

## **PROJECT BACKGROUND**

Rule 1156 was originally adopted in November 2005. Rule 1156 implemented a portion of the 2003 AQMP control measure BCM-08 – Further Emission Reductions of Particulate Emissions from Cement Manufacturing Facilities. Cement manufacturing facilities are defined as any facility engaged in producing Portland cement or associated products. In March 2009, the rule was amended to further reduce particulate emissions and to address elevated ambient concentrations of the carcinogen, Cr<sup>+6</sup>, observed at the Rubidoux monitoring station in Western Riverside County as part of the third Multiple Air Toxics Emissions Study (MATES III). To protect the public from Cr<sup>+6</sup> exposure, the amendments included a threshold for Cr<sup>+6</sup> that was established to be 0.70 ng/m<sup>3</sup> (excluding background), based on 100-in-a-million fence-line cancer risk. Based on MATES III, a 0.16 ng/m<sup>3</sup> Cr<sup>+6</sup> background was derived based on the two-year sampling effort at nine fixed-site monitoring stations across the Basin (excluding the Rubidoux station). The Rubidoux station was excluded from the derivation as its Cr<sup>+6</sup> levels were likely influenced by the cement manufacturing facilities. Therefore, a fence-line effective limit was established at 0.860 ng/m<sup>3</sup>. The rule amendment also required additional control measures such as: clinker storage area protection, Cr<sup>+6</sup> ambient monitoring, and wind monitoring, with contingencies (i.e., clinker enclosure based on Cr<sup>+6</sup> results and PM10 monitoring in case of elevated concentrations). As part of the rule amendment Resolution in 2009, the Board directed staff to re-evaluate the need for, and the frequency of, Cr<sup>+6</sup> ambient monitoring after five (5) years of data collection, and to establish a working group to develop a Facility Closure Air Quality Plan Option (Closure Plan).

SCAQMD staff met with the working group in 2010 and 2011 to discuss the criteria for facility closure and conditions to potentially sunset Cr<sup>+6</sup> ambient monitoring. A draft closure plan was developed and presented to the Stationary Source Committee (SSC) in 2012, but was left as a living document since neither facility was producing clinker at the time and there was uncertainty regarding future cement manufacturing activities. Currently, both cement manufacturing facilities are still non-operational regarding clinker production. RC and CPCC only process clinker or cement material imported from facilities outside the SCAQMD's jurisdiction.

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### **CEMENT MANUFACTURING OVERVIEW**

Portland cement is commonly manufactured through a dry method in which the combination of ground limestone rock and iron ore or other materials is fed to a cement kiln. As the materials move through the rotating kiln at a high temperature (about 2,700 degree Fahrenheit), some elements are driven off as gases or particulates and the remaining form a new substance called clinker. Clinker comes out of the kiln as hot, gray spheres about the size of large marbles. Clinker is cooled, ground and/or milled to a very fine product, and blended with small amounts of gypsum and fly ash to become cement, which is sold in packages or in bulk.



*Typical clinker nodules*

According to staff analysis in 2008 that included soil sampling, ambient air sampling, and emissions modeling, uncontrolled clinker material handling at cement manufacturing facilities associated with outdoor storage, transfer and re-entrained road dust were found to be the sources of the elevated ambient  $\text{Cr}^{+6}$  concentrations in Rubidoux. Kilns and finish mills at cement manufacturing facilities can also influence the formation and emissions of  $\text{Cr}^{+6}$ .  $\text{Cr}^{+6}$  is a potent, known carcinogen, exposure to which could result in lung cancer, irritation and damage to the skin, eyes, nose, throat, and lung, asthma symptoms, and/or allergic skin reactions. Since clinker materials might also contain other toxics such as lead, arsenic, cadmium, and cobalt in addition to  $\text{Cr}^{+6}$ , controlling emissions from these activities are essential.

Currently, both RC and CPCC are no longer producing clinker on-site. CPCC only imports cement from its Mojave facility for batch operations and has no immediate plans to restart one or

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## *Final Environmental Assessment: Chapter 1*

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both of its kilns to manufacture clinker at the Colton facility. However, CPCC retains the capability to restart clinker production. RC previously manufactured clinker at the Riverside facility, but has not done so for many years. RC continues its cement manufacturing at this location by importing clinker from its Oro Grande facility for grinding, blending, and packaging in enclosed buildings vented to air pollution control devices.

### **PROJECT DESCRIPTION**

The SCAQMD is developing PAR 1156 to address potential air quality impacts and exposure to Cr<sup>+6</sup> after the closure of cement manufacturing facilities, and to ensure long-term air quality and protection, while streamlining Cr<sup>+6</sup> ambient monitoring. The summary below and the revised rule language contained in Appendix A of this EA make up the project description used for this CEQA analysis. The proposed project includes requirements for owners/operators of the affected property before and after facility closure, as well as conditions for potential reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. The proposed amendments would reduce permissible Cr<sup>+6</sup> fence-line levels to reflect the Office of Environmental Health Hazard Assessment's (OEHHA) new risk assessment guidelines; reduce Cr<sup>+6</sup> monitoring requirements at existing facilities based either on compliance history, or potentially ceasing monitoring upon facility closure; and add provisions for a dust mitigation plan prior to any land disturbance activities occurring on a property after facility closure. A compliance plan with detailed descriptions of all feasible measures is required upon any confirmed Cr<sup>+6</sup> exceedance of the new threshold of 0.20 ng/m<sup>3</sup> occurring after September 5, 2016.

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## CHAPTER 2 - ENVIRONMENTAL CHECKLIST

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**Introduction**

**General Information**

**Environmental Factors Potentially Affected**

**Determination**

**Environmental Checklist and Discussion**

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## *Final Environmental Assessment: Chapter 2*

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### INTRODUCTION

The environmental checklist provides a standard evaluation tool to identify a project's potential adverse environmental impacts. This checklist identifies and evaluates potential adverse environmental impacts that may be created by the proposed project.

### GENERAL INFORMATION

Project Title:	Proposed Amended Rule 1156 – Further Reductions of Particulate Emissions from Cement Manufacturing Facilities
Lead Agency Name:	South Coast Air Quality Management District
Lead Agency Address:	21865 Copley Drive Diamond Bar, CA 91765
CEQA Contact Person:	Mr. Jeff Inabinet (909) 396-2453
Rule Contact Person	Ms. Tuyet-le Pham (909) 396-3299
Project Sponsor's Name:	South Coast Air Quality Management District
Project Sponsor's Address:	21865 Copley Drive Diamond Bar, CA 91765
General Plan Designation:	Not applicable
Zoning:	Not applicable
Description of Project:	To address potential air quality impacts from the closure of cement manufacturing facilities and to ensure long-term air quality and protection, the South Coast Air Quality Management District (SCAQMD) is proposing revisions to Rule 1156. The currently proposed amendments are intended to minimize potential air quality impacts from cement facility closure and to ensure long-term air quality and public protection, while streamlining Cr <sup>+6</sup> ambient monitoring. The proposed amendments include requirements for owners/operators of the affected property before and after facility closure. The proposed amendments would reduce permissible Cr <sup>+6</sup> fence-line levels to reflect the Office of Environmental Health Hazard Assessment's (OEHHA) new risk assessment guidelines; reduce Cr <sup>+6</sup> monitoring requirements at existing facilities based either on compliance history, or potentially ceasing monitoring upon facility closure; and add provisions for a dust mitigation plan prior to any land disturbance activities occurring on a property after facility closure.
Surrounding Land Uses and Setting:	Not applicable
Other Public Agencies Whose Approval is Required:	Not applicable

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## *Final Environmental Assessment: Chapter 2*

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### **ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED**

The following environmental impact areas have been assessed to determine their potential to be affected by the proposed project. As indicated by the checklist on the following pages, environmental topics marked with a "✓" may be adversely affected by the proposed project. An explanation relative to the determination of impacts can be found following the checklist for each area.

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Aesthetics                               | <input type="checkbox"/> Geology and Soils               | <input type="checkbox"/> Population and Housing             |
| <input type="checkbox"/> Agriculture and Forestry Resources       | <input type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Air Quality and Greenhouse Gas Emissions | <input type="checkbox"/> Hydrology and Water Quality     | <input type="checkbox"/> Recreation                         |
| <input type="checkbox"/> Biological Resources                     | <input type="checkbox"/> Land Use and Planning           | <input type="checkbox"/> Solid/Hazardous Waste              |
| <input type="checkbox"/> Cultural Resources                       | <input type="checkbox"/> Mineral Resources               | <input type="checkbox"/> Transportation/Traffic             |
| <input type="checkbox"/> Energy                                   | <input type="checkbox"/> Noise                           | <input type="checkbox"/> Mandatory Findings of Significance |

# ATTACHMENT G

## *Final Environmental Assessment: Chapter 2*

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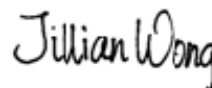
### **DETERMINATION**

On the basis of this initial evaluation:

- I find the proposed project, in accordance with those findings made pursuant to CEQA Guideline §15252, COULD NOT have a significant effect on the environment, and that an ENVIRONMENTAL ASSESSMENT with no significant impacts has been prepared.
- I find that although the proposed project could have a significant effect on the environment, there will NOT be significant effects in this case because revisions in the project have been made by or agreed to by the project proponent. An ENVIRONMENTAL ASSESSMENT with no significant impacts will be prepared.
- I find that the proposed project MAY have a significant effect(s) on the environment, and an ENVIRONMENTAL ASSESSMENT will be prepared.
- I find that the proposed project MAY have a "potentially significant impact" on the environment, but at least one effect 1)has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL ASSESSMENT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL ASSESSMENT pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL ASSESSMENT, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Date: July 17, 2015

Signature: \_\_\_\_\_



Jillian Wong, Ph.D.  
Program Supervisor  
Planning, Rule Development, and Area  
Sources



# ATTACHMENT G

## ENVIRONMENTAL CHECKLIST AND DISCUSSION

As discussed in Chapter 1, the main focus of PAR 1156 is to minimize potential air quality impacts from cement facility closure and ensure long-term air quality and public protection, while streamlining Cr<sup>+6</sup> ambient monitoring. The proposed project includes requirements for owners/operators of the affected property before and after facility closure, as well as conditions for potential reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. However, a compliance plan with detailed descriptions of all feasible measures is required upon any confirmed Cr<sup>+6</sup> exceedance of the new threshold of 0.20 ng/m<sup>3</sup> occurring after September 5, 2016.

The key proposed amendments to the rule include the following:

- Criteria for facility closure relative to cement manufacturing operation: activities must be completely ceased (i.e., blending silo, kiln, clinker cooler, and clinker grinding/milling) and related permits must be surrendered or have expired and are no longer reinstatable;
- Condition for reducing Cr<sup>+6</sup> ambient monitoring stations at existing cement facilities:
  - Approval for reduced number of monitoring stations (minimum of one) may be obtained upon subsequent 12 consecutive months of demonstrating less than current Cr<sup>+6</sup> threshold (0.70 ng/m<sup>3</sup>, excluding background) after date of rule amendment;
  - Reversion to more frequent monitoring schedule for confirmed exceedances of the applicable threshold, considering wind and other relevant data;
- Effective September 5, 2016, ambient Cr<sup>+6</sup> concentrations from a 30-day or 90-day rolling average shall not exceed 0.20 ng/m<sup>3</sup> (excluding background). Prior to this date, the previous Cr<sup>+6</sup> threshold of 0.70 ng/m<sup>3</sup> (excluding background) is still in effect.
- A compliance plan with detailed descriptions of all feasible measures is required upon any confirmed Cr<sup>+6</sup> exceedance of the new threshold of 0.20 ng/m<sup>3</sup> occurring after September 5, 2016.
- Criteria to validate duplicate samples:
  - PM10 concentrations of both samples must be below 0.002 grain/dscf; or
  - The difference between two samples shall be less than 35 percent of their average and the difference between the sample catches (normalized to the average sampling volume) shall be less than 3.5 milligrams;
- Requirements after facility closure:
  - Continued Cr<sup>+6</sup> ambient monitoring with possible sunset if no confirmed exceedance occurs during 12 consecutive months of monitoring after date of rule amendment;
  - Provisions for Cr<sup>+6</sup> ambient monitoring relocation and co-located monitoring and sampling by SCAQMD;

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- Dust mitigation plan submittal and written approval from SCAQMD prior to land disturbance activities:
  - Protocol for soil sampling and Cr<sup>+6</sup> ambient monitoring required before, during, and after land disturbance activities;
  - Approval for reducing Cr<sup>+6</sup> ambient monitoring stations and/or frequency of soil sampling and Cr<sup>+6</sup> ambient monitoring may be obtained based on scope of activities;
  - Description of control and/or stabilization measures required upon evidence of Cr<sup>+6</sup> in excess of the local background levels;
  - Required information regarding dust mitigation measures; and
  - Areas of property that are not contaminated may be excluded from the Dust Mitigation Plan, based on site-specific assessments identifying areas with and without Cr<sup>+6</sup> contamination; and

Once the new Cr<sup>+6</sup> threshold of 0.20 ng/m<sup>3</sup> becomes effective and there is a confirmed exceedance by the facility, a compliance plan with detailed descriptions of all feasible measures is required. Some of the potential measures may include additional controls on packing operations (i.e. installation of plastic shrouding), retrofitting of existing enclosures to ensure that fugitive emissions are not escaping, and application of water and/or chemical stabilizers for dust suppression. Potential impacts from these feasible measures are evaluated below in the appropriate environmental topic area.

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	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>I. AESTHETICS.</b> Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

The proposed project impacts on aesthetics will be considered significant if:

- The project will block views from a scenic highway or corridor.
- The project will adversely affect the visual continuity of the surrounding area.
- The impacts on light and glare will be considered significant if the project adds lighting which would add glare to residential areas or sensitive receptors.

**Discussion**

**I. a), b), c) & d)** PAR 1156 includes requirements for owners/operators of the affected properties before and after facility closure, as well as provisions for a reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. Additionally, the proposed project would revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the Office of Environmental Health Hazard Assessment’s (OEHHA) new risk assessment guidelines, revise criteria to validate duplicate particulate matter (PM) samples, and add provisions for a dust mitigation plan prior to land disturbing activities on the property after facility closure. Therefore, there is no construction anticipated that would alter any views of the site as a result of PAR 1156. If the fenceline threshold is exceeded, the owner/operator of the affected property will have to submit a compliance plan which includes measures to reduce the on-site fugitive emissions.

The affected facilities are located in an existing highly industrialized commercial area that does not have any known scenic vistas or scenic resources. No construction is anticipated that would alter any views of the site in order to comply with PAR 1156. Therefore, PAR 1156 would not obstruct any scenic resources or degrade the existing visual character of any affected site, including but not limited to, trees, rock outcroppings, or historic buildings. Further, the proposed project would not involve the demolition of any existing buildings or facilities, require the

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acquisition of any new land or the surrendering of existing land, or the modification of any existing land use designations or zoning ordinances. All new enclosures would be developed within the existing footprints of the affected facilities. Thus, the proposed project is not expected to degrade the visual character of any site or its surroundings from the existing visual character, affect any scenic vista, damage scenic resources, or create any new source of substantial light or glare.

Based upon these considerations, significant adverse aesthetics impacts are not anticipated and will not be further analyzed in this final EA. Since no significant adverse aesthetics impacts were identified, no mitigation measures are necessary or required.

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>II. AGRICULTURE AND FORESTRY RESOURCES.</b> Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland mapping and Monitoring Program of the California Resources Agency, to non- agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104 (g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### **Significance Criteria**

Project-related impacts on agriculture and forestry resources will be considered significant if any of the following conditions are met:

- The proposed project conflicts with existing zoning or agricultural use or Williamson Act contracts.

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- The proposed project will convert prime farmland, unique farmland or farmland of statewide importance as shown on the maps prepared pursuant to the farmland mapping and monitoring program of the California Resources Agency, to non-agricultural use.
- The proposed project conflicts with existing zoning for, or causes rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined in Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code § 51104 (g)).
- The proposed project would involve changes in the existing environment, which due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use.

### Discussion

**II. a), b), c) & d)** PAR 1156 includes requirements for owners/operators of the affected properties before and after facility closure, as well as provisions for a reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. Additionally, the proposed project would revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the Office of Environmental Health Hazard Assessment's (OEHHA) new risk assessment guidelines, revise criteria to validate duplicate particulate matter (PM) samples, and add provisions for a dust mitigation plan prior to land disturbing activities occurring on the property after facility closure. There is no construction anticipated as a result of PAR 1156. Therefore, adoption of the proposed project would not result in any new construction of buildings or other structures that would convert farmland to non-agricultural use or conflict with zoning for agricultural use or a Williamson Act contract. The proposed project would not require converting farmland to non-agricultural uses because the potentially affected facilities are already completely developed. For the same reasons, the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use.

Based upon these considerations, significant adverse agricultural and forestry resource impacts are not anticipated and will not be further analyzed in this final EA. Since no significant agriculture and forestry resource impacts were identified, no mitigation measures are necessary or required.

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	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>III. AIR QUALITY AND GREENHOUSE GAS EMISSIONS.</b>				
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Diminish an existing air quality rule or future compliance requirement resulting in a significant increase in air pollutant(s)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Air Quality Significance Criteria**

To determine whether or not air quality impacts from adopting and implementing the proposed project are significant, impacts will be evaluated and compared to the criteria in Table 2-1. The project will be considered to have significant adverse air quality impacts if any one of the thresholds in Table 2-1 are equaled or exceeded.

To determine whether or not greenhouse gas emissions from the proposed project may be significant, impacts will be evaluated and compared to the 10,000 MT CO<sub>2</sub>/year threshold for industrial sources.

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**TABLE 2-1  
SCAQMD Air Quality Significance Thresholds**

<b>Mass Daily Thresholds <sup>a</sup></b>		
<b>Pollutant</b>	<b>Construction <sup>b</sup></b>	<b>Operation <sup>c</sup></b>
<b>NO<sub>x</sub></b>	100 lbs/day	55 lbs/day
<b>VOC</b>	75 lbs/day	55 lbs/day
<b>PM<sub>10</sub></b>	150 lbs/day	150 lbs/day
<b>PM<sub>2.5</sub></b>	55 lbs/day	55 lbs/day
<b>SO<sub>x</sub></b>	150 lbs/day	150 lbs/day
<b>CO</b>	550 lbs/day	550 lbs/day
<b>Lead</b>	3 lbs/day	3 lbs/day
<b>Toxic Air Contaminants (TACs), Odor, and GHG Thresholds</b>		
<b>TACs</b> (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk $\geq$ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas $\geq$ 1 in 1 million) Chronic & Acute Hazard Index $\geq$ 1.0 (project increment)	
<b>Odor</b>	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
<b>GHG</b>	10,000 MT/yr CO <sub>2</sub> eq for industrial facilities	
<b>Ambient Air Quality Standards for Criteria Pollutants <sup>d</sup></b>		
<b>NO<sub>2</sub></b>  1-hour average annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
<b>PM<sub>10</sub></b> 24-hour average annual average	10.4 $\mu\text{g}/\text{m}^3$ (construction) <sup>e</sup> & 2.5 $\mu\text{g}/\text{m}^3$ (operation) 1.0 $\mu\text{g}/\text{m}^3$	
<b>PM<sub>2.5</sub></b> 24-hour average	10.4 $\mu\text{g}/\text{m}^3$ (construction) <sup>e</sup> & 2.5 $\mu\text{g}/\text{m}^3$ (operation)	
<b>SO<sub>2</sub></b> 1-hour average 24-hour average	0.25 ppm (state) & 0.075 ppm (federal – 99 <sup>th</sup> percentile) 0.04 ppm (state)	
<b>Sulfate</b> 24-hour average	25 $\mu\text{g}/\text{m}^3$ (state)	
<b>CO</b>  1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
<b>Lead</b> 30-day Average Rolling 3-month average Quarterly average	1.5 $\mu\text{g}/\text{m}^3$ (state) 0.15 $\mu\text{g}/\text{m}^3$ (federal) 1.5 $\mu\text{g}/\text{m}^3$ (federal)	

<sup>a</sup> Source: SCAQMD CEQA Handbook (SCAQMD, 1993)

<sup>b</sup> Construction thresholds apply to both the South Coast Air Basin and Coachella Valley (Salton Sea and Mojave Desert Air Basins).

<sup>c</sup> For Coachella Valley, the mass daily thresholds for operation are the same as the construction thresholds.

<sup>d</sup> Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.

<sup>e</sup> Ambient air quality threshold based on SCAQMD Rule 403.

KEY: lbs/day = pounds per day      ppm = parts per million       $\mu\text{g}/\text{m}^3$  = microgram per cubic meter       $\geq$  = greater than or equal to  
 MT/yr CO<sub>2</sub>eq = metric tons per year of CO<sub>2</sub> equivalents      > = greater than

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**III. a), b) and f)** Attainment of the state and federal ambient air quality standards protects sensitive receptors and the public in general from the adverse effects of criteria pollutants which are known to have adverse human health effects. The SCAQMD is required by law to prepare a comprehensive district-wide Air Quality Management Plan (AQMP) which includes strategies (e.g., control measures) to reduce emission levels to achieve and maintain state and federal ambient air quality standards, and to ensure that new sources of emissions are planned and operated to be consistent with the SCAQMD's air quality goals. The AQMP's air pollution reduction strategies include control measures which target stationary, area, mobile and indirect sources. These control measures are based on feasible methods of attaining ambient air quality standards. Pursuant to the provisions of both the state and federal Clean Air Acts (CAA)s, the SCAQMD is required to attain the state and federal ambient air quality standards for all criteria pollutants.

The main focus of PAR 1156 is to minimize potential air quality impacts from cement facility closure and ensure long-term air quality and public protection, while streamlining Cr<sup>+6</sup> ambient monitoring. The proposed project includes requirements for owners/operators of the affected property before and after facility closure, as well as conditions for potential reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. However, a compliance plan with detailed descriptions of all feasible measures is required upon any confirmed Cr<sup>+6</sup> exceedance of the new threshold of 0.20 ng/m<sup>3</sup> occurring after September 5, 2016.

### **Construction Impacts**

PAR 1156 includes requirements for owners/operators of the affected properties before and after facility closure, as well as provisions for a reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. Additionally, the proposed project would revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the Office of Environmental Health Hazard Assessment's (OEHHA) new risk assessment guidelines, revise criteria to validate duplicate particulate matter (PM) samples, and add provisions for a dust mitigation plan prior to land disturbing activities occurring on the property after facility closure. A compliance plan with detailed descriptions of all feasible measures is required upon any confirmed Cr<sup>+6</sup> exceedance of the new threshold of 0.20 ng/m<sup>3</sup> occurring after September 5, 2016. Potential measures in the compliance plan could include the installation of plastic shrouding around bagging operations, the partitioning of active bagging operations from the finished product storage areas, and the installation of plastic door flaps to prevent the escape of fugitive dust.

The construction-related activities attributable to installing this type of limited control equipment would be conducted using predominantly small, hand held tools, since most of this equipment is manufactured off-site and brought to the location. For the purposes of this analysis, construction activities undertaken to install this limited type of control equipment are anticipated to entail the use of hand held equipment by small construction crews to cut, fit and affix plastic shrouding/partitioning where necessary. Criteria pollutant emissions were calculated for all on-road vehicles transporting workers, vendors, and material delivery associated with the limited control equipment. Table 2-2 presents the peak daily construction emissions associated with the installation of shrouding/partitioning materials. Construction emissions calculations are provided in Appendix B.



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**Table 2-2  
Peak Daily Construction Emissions Due to Installation of Shrouding / Partitioning  
Materials**

PEAK CONSTRUCTION	VOC	CO	NO <sub>x</sub>	SO <sub>x</sub>	PM10	PM2.5
	lbs/day	lbs/day	lbs/day	lbs/day	lbs/day	lbs/day
Total Project Emissions	0.69	4.60	4.55	0.01	0.26	0.21
SCAQMD CEQA SIGNIFICANCE THRESHOLD	75	550	100	150	150	55
SIGNIFICANT?	NO	NO	NO	NO	NO	NO

The construction-related emissions attributable to installing this type of limited control equipment do not exceed SCAQMD peak daily construction emission significance thresholds.

### Operational Impacts- Criteria Pollutants

The two affected facilities are currently required to apply chemical stabilizers to the properties twice per year, per Rule 1156. If the new Cr<sup>+6</sup> ambient air monitoring fence-line threshold is exceeded, additional applications of chemical soil stabilizers may be required at the property, including any areas where uncovered piles of material are located on-site. For a conservative approach, it was estimated that each affected facility may be required to apply chemical soil stabilizers an additional two times per year. Also, additional Cr<sup>+6</sup> sampling requirements will require the collection and delivery of samples to a laboratory for analysis. The sprayer truck emissions associated with the additional soil stabilizer applications and the sample collection and laboratory delivery vehicle emissions are presented in Table 2-3. Operational emissions calculations are provided in Appendix C.

**Table 2-3  
Peak Daily Operational Emissions Due to Additional Chemical Soil Stabilizer Applications  
and Sample Collection / Delivery**

PEAK DAILY OPERATION	VOC	CO	NO <sub>x</sub>	SO <sub>x</sub>	PM10	PM2.5
	lbs/day	lbs/day	lbs/day	lbs/day	lbs/day	lbs/day
Total Project Emissions	1.36	7.06	10.35	0.02	0.44	0.43
SCAQMD CEQA SIGNIFICANCE THRESHOLD	55	550	55	150	150	55
SIGNIFICANT?	NO	NO	NO	NO	NO	NO

The operational-related emissions attributable to additional soil stabilizer applications and sample collection/delivery do not exceed SCAQMD peak daily operational emissions significance thresholds.

### Operational Impacts- Toxic Air Contaminants

In assessing potential impacts from the adoption of proposed rules and amendments, SCAQMD staff not only evaluates the potential air quality benefits, but also determines potential health risks associated with implementation of the proposed rules and amendments.

Adoption of the proposed rule would establish procedures to reduce Cr<sup>+6</sup> emissions from the affected facilities even after facility closure. There are no provisions in the rule that would

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generate any toxic emissions. As a result, there will be no increase in toxic air contaminant emissions due to the proposed project.

In summary, because emissions from this project would not exceed any SCAQMD thresholds for construction or operations, the proposed project will have no impact on our ability to implement the AQMP, no impact on any air quality standards, and no impact on any rules or requirements that could significantly impact air quality.

**III. c)** As Lead Agency, the SCAQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant<sup>4</sup>.

This approach was upheld by the Court in *Citizens for Responsible Equitable Environmental Development v. City of Chula Vista* (2011) 197 Cal. App. 4th 327, 334. The Court determined that where it can be found that a project did not exceed the SDAPCD's established air quality significance thresholds, the City of Chula Vista properly concluded that the project would not cause a significant environmental effect, nor result in a cumulatively considerable increase in these pollutants. The court found this determination to be consistent with CEQA Guidelines §15064.7, stating, "The lead agency may rely on a threshold of significance standard to determine whether a project will cause a significant environmental effect." The court found that, "Although the project will contribute additional air pollutants to an existing nonattainment area, these increases are below the significance criteria..." "Thus, we conclude that no fair argument exists that the Project will cause a significant unavoidable cumulative contribution to an air quality impact." As in *Chula Vista*, here the District has demonstrated, when using accurate and appropriate data and assumptions, that the project will not exceed the established SCAQMD significance thresholds. See also, *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal. App. 4th 899. Here again the court upheld the lead agency's approach to utilizing the established air quality significance thresholds to determine whether the impacts of a project would be cumulatively considerable. Thus, it may be concluded that the Project will not cause a significant unavoidable cumulative contribution to an air quality impact.

Based on the foregoing analysis, project-specific air quality impacts from implementing the proposed project would not exceed air quality significance thresholds (Table 2-1); therefore, based on the above discussion, cumulative impacts are not expected to be significant for air quality. Therefore, potential adverse impacts from the proposed project would not be "cumulatively considerable" as defined by CEQA Guidelines §15064(h)(1) for air quality impacts. Per CEQA Guidelines §15064(h)(4), the mere existing of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulative considerable.

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<sup>4</sup> SCAQMD Cumulative Impacts Working Group White Paper on Potential Control Strategies to Address Cumulative Impacts From Air Pollution, August 2003, Appendix D, Cumulative Impact Analysis Requirements Pursuant to CEQA, at D-3, <http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4>.

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**III. d)** Affected facilities are not expected to increase exposure by sensitive receptors to substantial pollutant concentrations from the implementation of PAR 1156 for the following reasons: 1) the proposed monitoring requirements and compliance plan will help reduce potential toxic exposure by sensitive receptors; 2) there are no provisions in the proposed rule that would cause an affected facility to generate any new or increased toxic emissions; and 3) there will be no additional electrical generation facilities needed as a result of the adoption of the proposed project (note: there will be a minimal additional need for power, but the demand, according to the power generators, can be met with existing systems). Therefore, significant adverse air quality impacts to sensitive receptors are not expected from implementing the proposed project.

**III. e)** The main objective of the proposed rule is to establish procedures to reduce Cr<sup>+6</sup> emissions from the affected facilities even after facility closure. Therefore, no significant odor impacts are expected to result from implementing the proposed project, as no odorous compounds are generated by any proposed project activities.

**III. g) & h)** Changes in global climate patterns have been associated with global warming, an average increase in the temperature of the atmosphere near the Earth's surface, recently attributed to accumulation of GHG emissions in the atmosphere. GHGs trap heat in the atmosphere, which in turn heats the surface of the Earth. Some GHGs occur naturally and are emitted to the atmosphere through natural processes, while others are created and emitted solely through human activities. The emission of GHGs through the combustion of fossil fuels (i.e., fuels containing carbon) in conjunction with other human activities, appears to be closely associated with global warming.<sup>5</sup> State law defines GHG to include the following: carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>) (HSC §38505(g)). The most common GHG that results from human activity is CO<sub>2</sub>, followed by CH<sub>4</sub> and N<sub>2</sub>O.

GHGs and other global warming pollutants are often perceived as solely global in their impacts because increasing emissions anywhere in the world contributes to climate change anywhere in the world. However, a study conducted on the health impacts of CO<sub>2</sub> “domes” that form over urban areas shows they can cause increases in local temperatures and local criteria pollutants, which have adverse health effects.<sup>6</sup>

The analysis of GHGs is a different analysis than the analysis of criteria pollutants for the following reasons. For criteria pollutants, the significance thresholds are based on daily emissions because attainment or non-attainment is primarily based on daily exceedances of applicable ambient air quality standards. Further, several ambient air quality standards are based on relatively short-term exposure effects on human health (e.g., one-hour and eight-hour standards). Since the half-life of CO<sub>2</sub> is approximately 100 years, for example, the effects of GHGs occur over a longer term which means they affect the global climate over a relatively long

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<sup>5</sup> Solomon, S., D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.). 2007. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change, 2007. Cambridge University Press.  
[http://www.ipcc.ch/publications\\_and\\_data/ar4/wg1/en/contents.html](http://www.ipcc.ch/publications_and_data/ar4/wg1/en/contents.html)

<sup>6</sup> Jacobsen, Mark Z. “Enhancement of Local Air Pollution by Urban CO<sub>2</sub> Domes,” Environmental Science and Technology, as describe in Stanford University press release on March 16, 2010 available at:  
<http://news.stanford.edu/news/2010/march/urban-carbon-domes-031610.html>.

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time frame. As a result, the SCAQMD's current position is to evaluate the effects of GHGs over a longer timeframe than a single day (e.g., annual emissions). GHG emissions are typically considered to be cumulative impacts because they contribute to global climate effects.

On December 5, 2008, the SCAQMD adopted an interim CEQA GHG Significance Threshold for projects where SCAQMD is the lead agency (SCAQMD, 2008). This interim threshold is set at 10,000 metric tons of CO<sub>2</sub> equivalent emissions (MTCO<sub>2</sub>eq) per year. Projects with incremental increases below this threshold will not be deemed to be cumulatively considerable.

The Program EIR for the 2012 AQMP concluded that implementing the control measures in the 2012 AQMP would provide a comprehensive ongoing regulatory program that would reduce overall GHGs emissions in the District.

GHG emissions were calculated for all on-road vehicles transporting workers, vendors, and material delivery associated with the limited control equipment (plastic shrouding/partitioning) required by the proposed project. Additionally, GHG emissions were calculated for additional operational requirements (application of soil stabilizers and additional monitoring sample collection/delivery) from the proposed project. Table 2-4 provides the total construction CO<sub>2</sub>E emissions that could occur as a result of the proposed project. Detailed GHG calculations can be found in Appendices B and C. As shown in Table 2-4, GHG emissions generated by the construction and operational activities are expected to be relatively small, much less than 10,000 metric tons per year (SCAQMD's GHG significance threshold), and, therefore, not significant.

**Table 2-4**  
**Overall CO<sub>2</sub> Equivalent (eq) Increases Due to Construction and Operational Activities**  
**(metric tons/year)<sup>1</sup>**

	<b>CO<sub>2</sub></b>	<b>CH<sub>4</sub></b>	<b>CO<sub>2</sub>eq</b>
<b>Annual CO<sub>2</sub>eq Emission Increases Due to:</b>	lb/day	lb/day	MT/year
Proposed Construction Activities	1,393	0.05	1.27
Proposed Operational Activities	2,182	0.12	1.99
	<b>Total</b>		<b>3.26</b>

<sup>1</sup> 1 metric ton = 2,205 pounds

Since the proposed project is not expected to generate significant construction or operation-related GHG emissions, cumulative GHG adverse impacts from the proposed project are not considered significant or cumulatively considerable.

### **Indirect GHG and Criteria Pollutant Emissions from Electricity Consumption**

Indirect GHG and criteria pollutant emissions are expected from the generation of electricity to operate new equipment that occurs off-site at electricity generating facilities (EGFs). Emissions from electricity generating facilities at their maximum permitted capacity are already evaluated in the CEQA documents for those projects when they are built or modified. The analysis in Section VI. Energy- b), c) and d) demonstrated that there is not likely to be increased electricity consumption from the proposed rule.

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Under the SCAQMD Regional Clean Air Incentives Market (RECLAIM) program (that regulates NOx and SOx emissions), EGFs were provided annual allocations of NOx and SOx emissions that typically decline annually. However, the proposed project does require an increase in energy generation and any increase in emissions from generating additional energy (See Section VI. Energy for impacts) from the EGFs would be required to offset any potential NOx and SOx emission increases under the RECLAIM program and other pollutants under the New Source Review Project. Thus, air quality impacts from energy generation are anticipated to be to less than significant impacts.

### **Conclusion**

Based on the preceding evaluation of potential air quality impacts, SCAQMD staff has concluded that the proposed project does not have the potential to generate significant adverse air quality impacts. Since no significant adverse air quality and greenhouse gases impacts were identified, no mitigation measures are necessary or required.

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	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>IV. BIOLOGICAL RESOURCES.</b>				
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by §404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflicting with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Impacts on biological resources will be considered significant if any of the following criteria apply:

- The project results in a loss of plant communities or animal habitat considered to be rare, threatened or endangered by federal, state or local agencies.
- The project interferes substantially with the movement of any resident or migratory wildlife species.
- The project adversely affects aquatic communities through construction or operation of the project.

**Discussion**

**IV. a), b), c), & d)** PAR 1156 includes requirements for owners/operators of the affected properties before and after facility closure, as well as provisions for a reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. Additionally, the proposed project would revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the Office of Environmental Health Hazard Assessment's (OEHHA) new risk assessment guidelines, revise criteria to validate duplicate particulate matter (PM) samples, and add provisions for a dust mitigation plan prior to land disturbing activities occurring on the property after facility closure. Therefore, there is no construction anticipated outside of existing building footprints as a result of PAR 1156. The biological resources have already been disturbed or removed at the existing facilities. As a result, the proposed project would not directly or indirectly affect any new or existing species identified as a candidate, sensitive or special status species, riparian habitat, federally protected wetlands, or migratory corridors. For this same reason, the proposed project is not expected to adversely affect special status plants, animals, or natural communities.

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**IV. e) & f)** The proposed project would not conflict with local policies or ordinances protecting biological resources or local, regional, or state conservation plans because it would not cause new development. All existing facilities are already developed and the proposed project will not result in the need for construction. Additionally, the proposed project would not conflict with any Habitat Conservation Plan, Natural Community Conservation Plan, or any other relevant habitat conservation plan for the same reason identified in Item IV. a), b), c), and d) above. Likewise, the proposed project would not in any way impact wildlife or wildlife habitat.

Based upon these considerations, significant adverse biological resources impacts are not anticipated and will not be further analyzed in this final EA. Since no significant adverse biological resources impacts were identified, no mitigation measures are necessary or required.

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>V. CULTURAL RESOURCES.</b> Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource, site, or feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code §21074?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Impacts to cultural resources will be considered significant if:

- The project results in the disturbance of a significant prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group.
- Unique paleontological resources are present that could be disturbed by construction of the proposed project.
- The project would disturb human remains.

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### **Discussion**

**V. a), b), c), & d)** PAR 1156 includes requirements for owners/operators of the affected properties before and after facility closure, as well as provisions for a reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. Additionally, the proposed project would revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the Office of Environmental Health Hazard Assessment's (OEHHA) new risk assessment guidelines, revise criteria to validate duplicate particulate matter (PM) samples, and add provisions for a dust mitigation plan prior to land disturbing activities occurring on the property after facility closure. Therefore, there is no construction anticipated as a result of PAR 1156. Furthermore, all existing affected facilities have already been developed and would not require disturbing native soils that may contain cultural resources.

Since no activities requiring native soil disturbance would be associated with the implementation of the proposed project, no impacts to historical or cultural resources are anticipated to occur. Further, the proposed project is not expected to require any major physical changes to the environment, which may disturb paleontological or archaeological resources or disturb human remains interred outside of formal cemeteries.

**V. e)** The proposed project is not expected to require physical changes to a site, feature, place, cultural landscape, sacred place or object with cultural value to a California Native American Tribe. Furthermore, the proposed project is not expected to result in a physical change to a resource determined to be eligible for inclusion or listed in the California Register of Historical Resources or included in a local register of historical resources. For these reasons, the proposed project is not expected to cause any substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code §21074.

It is important to note that as part of releasing this CEQA document for public review and comment, the SCAQMD also provided a formal notice of the proposed project to all California Native American Tribes (Tribes) that requested to be on the Native American Heritage Commission's (NAHC) notification list per Public Resources Code §21080.3.1 (b)(1). The NAHC notification list provides a 30-day period during which a Tribe may respond to the formal notice, in writing, requesting consultation on the proposed project.

In the event that a Tribe submits a written request for consultation during this 30-day period, the SCAQMD will initiate a consultation with the Tribe within 30 days of receiving the request in accordance with Public Resources Code §21080.3.1 (b). Consultation ends when either: 1) both parties agree to measures to avoid or mitigate a significant effect on a Tribal Cultural Resource and agreed upon mitigation measures shall be recommended for inclusion in the environmental document [see Public Resources Code §21082.3 (a)]; or, 2) either party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached [see Public Resources Code §21080.3.2 (b)(1)-(2) and §21080.3.1 (b)(1)].

Based upon these considerations, significant adverse cultural resources impacts are not expected from implementing the proposed project and will not be further assessed in this final EA. Since no significant cultural resources impacts were identified, no mitigation measures are necessary or required.



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	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>VI. ENERGY.</b> Would the project:				
a) Conflict with adopted energy conservation plans?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the need for new or substantially altered power or natural gas utility systems?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Create any significant effects on local or regional energy supplies and on requirements for additional energy?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create any significant effects on peak and base period demands for electricity and other forms of energy?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Comply with existing energy standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### **Significance Criteria**

Impacts to energy and mineral resources will be considered significant if any of the following criteria are met:

- The project conflicts with adopted energy conservation plans or standards.
- The project results in substantial depletion of existing energy resource supplies.
- An increase in demand for utilities impacts the current capacities of the electric and natural gas utilities.
- The project uses non-renewable resources in a wasteful and/or inefficient manner.

### **Discussion**

**VI. a) & e)** The proposed project does not require any action which would result in any conflict with an adopted energy conservation plan or violation of any energy conservation standard. PAR 1156 is not expected to conflict with adopted energy conservation plans because existing affected facilities would be expected to continue implementing any existing energy conservation plans.

The proposed project is not expected to cause new development outside of the footprint of the affected facilities. The local jurisdiction or energy utility sets standards (including energy conservation) and zoning guidelines regarding new development and will approve or deny applications for building new equipment at the affected facility.

As a result, the proposed project would not conflict with energy conservation plans, use non-renewable resources in a wasteful manner, or result in the need for new or substantially altered power or natural gas systems.

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**VI. b), c) & d)** There is not expected to be an increase in electricity consumption associated with the continued ambient air monitoring, because fenceline monitors will likely be battery powered and are already in use. Diesel fuel would be consumed by trucks delivering the plastic shrouding / partitioning materials to the facilities and gasoline fuel would be consumed by the workers' vehicles installing control materials and trips required to collect the samples and to send to the lab for analysis. The following sections evaluate the various forms of energy sources affected by the proposed project.

**Petroleum Fuels:** During the construction phases, diesel and gasoline fuel will be consumed in delivery trucks and construction workers' vehicles traveling to and from the two affected sites. To estimate "worst-case" energy impacts associated with the construction phase for the proposed project, the SCAQMD assumed that shrouding / partitioning material would be installed at both affected facilities simultaneously. The details of the construction scenarios are included in Appendix B.

To estimate construction workers' fuel usage per commute round trip, the SCAQMD assumed that workers' vehicles would get 20 miles to the gallon and would travel 50 miles round trip to and from the construction site in one day. Table 2-5 lists the projected energy impacts associated with the construction and installation at the two affected facilities at any given time.

**Table 2-5  
Total Projected Fuel Usage for Construction Activities**

Overall Construction Activity	Equipment Type	Total Diesel Fuel Use (gal)	Total Gasoline Fuel Use (gal)
Diesel	Heavy-Heavy Duty Delivery Truck	26.67	N/A
Gasoline	Mixed Passenger Worker Vehicle	N/A	50

\* Assume that delivery trucks use diesel and get 15 miles/gallon traveling 100 miles roundtrip; 2 locations

\*\* Assume that construction workers' commute vehicles use gasoline and get 20 mi/gal and round trip length is 50 miles/phase.

Additionally, diesel fuel will be used by the spraying trucks used to apply additional soil stabilizers and gasoline fuel will be consumed in workers' vehicles operating the spraying trucks and collecting/delivering additional samples. The details of the operational scenario are included in Appendix C. Table 2-6 lists the projected energy impacts associated with operational activities required by the proposed project.

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**Table 2-6  
Total Projected Fuel Usage for Operational Activities**

Overall Construction Activity	Equipment Type	Total Diesel Fuel Use (gal)	Total Gasoline Fuel Use (gal)
Diesel	Heavy-Heavy Duty Spraying Truck	79.04	N/A
Gasoline	Mixed Passenger Worker Vehicle-Spraying Truck Operator	N/A	10
Gasoline	Mixed Passenger Worker Vehicle-Sample Collection / Delivery	N/A	10

\* Assume that spraying vehicle use diesel and operate 8 hours/day (2 facilities).

\*\* Assume that construction workers' commute vehicles use gasoline and get 20 mi/gal and round trip length is 50 miles/phase.

Based on the above information, the proposed project is not expected to generate significant adverse energy resources impacts and will not be discussed further in this final EA. Since no significant energy impacts were identified, no mitigation measures are necessary or required.

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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**VII. GEOLOGY AND SOILS.** Would the project:

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
• Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Significance Criteria

Impacts on the geological environment will be considered significant if any of the following criteria apply:

- Topographic alterations would result in significant changes, disruptions, displacement, excavation, compaction or over covering of large amounts of soil.
- Unique geological resources (paleontological resources or unique outcrops) are present that could be disturbed by the construction of the proposed project.
- Exposure of people or structures to major geologic hazards such as earthquake surface rupture, ground shaking, liquefaction or landslides.
- Secondary seismic effects could occur which could damage facility structures, e.g., liquefaction.
- Other geological hazards exist which could adversely affect the facility, e.g., landslides, mudslides.

### Discussion

**VII. a)** Southern California is an area of known seismic activity. Structures must be designed to comply with the Uniform Building Code Zone 4 requirements if they are located in a seismically active area. The local city or county is responsible for assuring that a proposed project complies with the Uniform Building Code as part of the issuance of the building permits and can conduct inspections to ensure compliance. The Uniform Building Code is considered to be a standard

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safeguard against major structural failures and loss of life. The goal of the code is to provide structures that will: 1) resist minor earthquakes without damage; 2) resist moderate earthquakes without structural damage but with some non-structural damage; and 3) resist major earthquakes without collapse but with some structural and non-structural damage.

The Uniform Building Code bases seismic design on minimum lateral seismic forces (“ground shaking”). The Uniform Building Code requirements operate on the principle that providing appropriate foundations, among other aspects, helps to protect buildings from failure during earthquakes. The basic formulas used for the Uniform Building Code seismic design require determination of the seismic zone and site coefficient, which represent the foundation conditions at the site. Accordingly, buildings and equipment at existing facilities affected by PAR 1156 are likely to conform with the Uniform Building Code and all other applicable state codes in effect at the time they were constructed.

PAR 1156 includes requirements for owners/operators of the affected properties before and after facility closure, as well as provisions for a reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. Additionally, the proposed project would revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the Office of Environmental Health Hazard Assessment’s (OEHHA) new risk assessment guidelines, revise criteria to validate duplicate particulate matter (PM) samples, and add provisions for a dust mitigation plan prior to land disturbing activities occurring on the property after facility closure. Therefore, there is no construction anticipated as a result of PAR 1156. Therefore, no major change in geological existing setting is expected. Consequently, the proposed project is not expected to expose persons or property to new geological hazards such as earthquakes, landslides, mudslides, ground failure, or other natural hazards. As a result, substantial exposure of people or structure to the risk of loss, injury, or death involving seismic-related activities is not anticipated and will not be further analyzed in this final EA.

**VII. b), c), d) & e)** Since the proposed project would affect two existing facilities, it is expected that the soil types present at the affected facilities that are susceptible to expansion or liquefaction would be considered part of the existing setting. Implementation of PAR 1156 would not require construction outside of building footprints; therefore, new subsidence impacts are not anticipated since no major excavation or fill activities are expected to occur at affected facilities. Further, the proposed project does not involve the removal of underground products (e.g., water, crude oil, et cetera) that could produce new, or make worse existing subsidence effects. Additionally, the affected areas are not envisioned to be prone to new risks from landslides or have unique geologic features, since the affected facilities are located in highly industrial/commercial areas where such features have already been altered or removed. Finally, since adoption of the proposed project would be expected to affect operations at primarily existing facilities, the proposed project is not expected to alter or make worse any existing potential for subsidence, liquefaction, etc.

Based on the above discussion, the proposed project is not expected to have an adverse impact on geology or soils. Since no significant adverse impacts are anticipated, this environmental topic will not be further analyzed in the final EA. No mitigation measures are necessary or required.

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	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>VIII. HAZARDS AND HAZARDOUS MATERIALS.</b> Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, and disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public use airport or a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
h) Significantly increased fire hazard in areas with flammable materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Significance Criteria

Impacts associated with hazards will be considered significant if any of the following occur:

- Non-compliance with any applicable design code or regulation.
- Non-conformance to National Fire Protection Association standards.
- Non-conformance to regulations or generally accepted industry practices related to operating policy and procedures concerning the design, construction, security, leak detection, spill containment or fire protection.
- Exposure to hazardous chemicals in concentrations equal to or greater than the Emergency Response Planning Guideline (ERPG) 2 levels.

## Discussion

**VIII. a, b) & c)** PAR 1156 includes requirements for owners/operators of the affected properties before and after facility closure, as well as provisions for a reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. Additionally, the proposed project would revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the Office of Environmental Health Hazard Assessment's (OEHHA) new risk assessment guidelines, revise criteria to validate duplicate particulate matter (PM) samples, and add provisions for a dust mitigation plan prior to land disturbing activities occurring on the property after facility closure. Therefore, there is no construction anticipated as a result of PAR 1156. If the fence-line threshold is exceeded, the owner/operator of the affected property will have to submit a compliance which includes measures to reduce the on-site fugitive emissions. Therefore, the proposed project will not create a significant hazard to the public or the environment through the routine transport, use, and disposal of hazardous materials.

Adoption of the proposed rule would establish procedures to reduce Cr<sup>+6</sup> emissions from facilities even after closure. Therefore, there is little likelihood that affected facilities will emit new hazardous emissions or handle hazardous materials, substances or waste within one-quarter mile of an existing or proposed school as a result of implementing the proposed project.

**VIII. d)** It is not anticipated that the proposed project will alter in any way how operators of facilities who are affected by PAR 1156 manage their hazardous wastes. Government Code §65962.5 typically refers to a list of facilities that may be subject to Resource Conservation and Recovery Act (RCRA) permits. For any facilities affected by the proposed project that are on the Government Code §65962.5 list, it is anticipated that they would continue to manage any and all hazardous materials and hazardous waste, in accordance with federal, state and local regulations.

Riverside Cement (1500 Rubidoux Ave.) was listed on the Department of Toxic Substances Control (DTSC) Envirostor database as an "evaluation" site. According to the listing, the site was screened by the EPA in 2007. No further information was available.

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California Portland Cement Company was not identified on the Envirostor database. However, a “closed” rail site (Site ID- 400217) was identified as being located within the site boundary. The database identified this listing as “Inactive facility - clean closed” and indicated that the facility has completed its closure activities.

**VIII. e)** Neither of the affected facilities is within two miles of an airport or private air strip; therefore, implementation of the proposed project is not expected to create any additional safety hazards for people residing or working in the project area.

**VIII. f)** The proposed project does not contain any provisions which will impair implementation of, or physically interfere with any adopted emergency response plan or emergency evacuation plan. Since the proposed project does not involve the change in current uses of any hazardous materials, or generate any new hazardous waste, no changes to emergency response plans are anticipated.

**VIII. g)** The two affected facilities are located in developed urban areas, where wildlands are not prevalent, risk of loss or injury associated with wildland fires is not expected as a result of implementing the proposed project.

**VIII. h)** Affected facilities must comply with all local and county requirements for fire prevention and safety. The proposed project does not require any activities which would be in conflict with fire prevention and safety requirements, and thus would not create or increase fire hazards at these existing facilities.

Pursuant to local and county fire prevention and safety requirements, facilities are required to maintain appropriate site management practices to prevent fire hazards. The proposed project will not interfere with fire prevention practices.

In conclusion, potentially significant adverse hazard or hazardous material impacts resulting from adopting and implementing the proposed project are not expected and will not be considered further. No mitigation measures are necessary or required.

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	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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**IX. HYDROLOGY AND WATER QUALITY.** Would the project:

a) Violate any water quality standards, waste discharge requirements, exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board, or otherwise substantially degrade water quality?



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	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in substantial erosion or siltation on- or off-site or flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Place housing or other structures within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam, or inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
g) Require or result in the construction of new water or wastewater treatment facilities or new storm water drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Potential impacts on water resources will be considered significant if any of the following criteria apply:

Water Demand:

- The existing water supply does not have the capacity to meet the increased demands of the project, or the project would use more than 262,820 gallons per day of potable water.
- The project increases demand for total water by more than five million gallons per day.

Water Quality:

- The project will cause degradation or depletion of ground water resources substantially affecting current or future uses.
- The project will cause the degradation of surface water substantially affecting current or future uses.
- The project will result in a violation of National Pollutant Discharge Elimination System (NPDES) permit requirements.
- The capacities of existing or proposed wastewater treatment facilities and the sanitary sewer system are not sufficient to meet the needs of the project.
- The project results in substantial increases in the area of impervious surfaces, such that interference with groundwater recharge efforts occurs.
- The project results in alterations to the course or flow of floodwaters.

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## **Discussion**

PAR 1156 includes requirements for owners/operators of the affected properties before and after facility closure, as well as provisions for a reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. Additionally, the proposed project would revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the Office of Environmental Health Hazard Assessment's (OEHHA) new risk assessment guidelines, revise criteria to validate duplicate particulate matter (PM) samples, and add provisions for a dust mitigation plan prior to land disturbing activities occurring on the property after facility closure. Therefore, there is no construction anticipated as a result of PAR 1156. If the fenceline threshold is exceeded, the owner/operator of the affected property will have to submit a compliance which includes measures to reduce the on-site fugitive emissions.

**IX. a) & f)** No additional amount of wastewater generation is expected from the implementation of the proposed project. Therefore, there would be no impact on the current wastewater infrastructure. The proposed project is not expected to cause potentially affected facilities to violate any water quality standard or wastewater discharge requirements. The adoption of the proposed project is not expected to have significant adverse water demand or water quality impacts for the following reasons:

- The proposed project does not increase total demand for water by more than 5,000,000 gallons per day (or 262,820 gallons per day of potable water).
- The proposed project does not require construction of new water conveyance infrastructure.
- The proposed project does not create a substantial increase in mass inflow of effluents to public wastewater treatment facilities.
- The proposed project does not result in a substantial degradation of surface water or groundwater quality.
- The proposed project does not result in substantial increases in the area of impervious surfaces, such that interference with groundwater recharge efforts occurs.
- The proposed project does not result in alterations to the course or flow of floodwaters.

**IX. b)** Because the proposed requirements of PAR 1156 do not rely on water, no increase to any affected facilities' existing water demand is expected. No additional watering requirements are currently being proposed beyond those in the current rule. Therefore, implementation of PAR 1156 will not increase demand for, or otherwise affect groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. In addition, implementation of PAR 1156 will not increase demand for water from existing entitlements and resources, and will not require new or expanded entitlements. No provisions of the proposed rule are expected to interfere with groundwater recharge. Therefore, no water demand impacts are expected as the result of implementing PAR 1156.

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**IX. c), d), & e)** Implementation of the proposed project will occur at existing facilities that are paved and have drainage infrastructure in place. Any modifications required by the proposed project are expected to take place within the existing footprints of the affected facilities, which are already completely developed with existing storm water collection systems. Therefore, no change to existing storm water runoff, drainage patterns, groundwater characteristics, or flow are expected.

**IX. g), h), & i)** The proposed project will not require construction of new housing, and all construction activities associated with PAR 1156 are expected to take place at existing facilities that are already developed. Therefore, the proposed project is not expected to generate construction of any new structures in 100-year flood areas as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood delineation map. Further, the proposed project is not expected to require additional operational workers at affected facilities. As a result, the proposed project is not expected to expose people or structures to significant new flooding risks, or make worse any existing flooding risks. Finally, the proposed project will not affect in any way any potential flood hazards inundation by seiche, tsunami, or mud flow that may already exist relative to existing facilities or create new hazards at existing facilities.

The proposed project is not expected to generate a substantial amount of new storm water runoff. Therefore, no new storm water discharge treatment facilities or modifications to existing facilities will be required due to the implementation of the proposed project. Accordingly, the proposed project is not expected to generate significant adverse impacts relative to construction of new storm water drainage facilities.

Based upon these considerations, significant hydrology and water quality impacts are not expected from the implementation of the proposed project and will not be further analyzed in this final EA. Since no significant hydrology and water quality impacts were identified, no mitigation measures are necessary or required.

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	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>X. LAND USE AND PLANNING.</b>				
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Land use and planning impacts will be considered significant if the project conflicts with the land use and zoning designations established by local jurisdictions.

**Discussion**

**X. a)** Adoption of the proposed rule would establish procedures to reduce Cr<sup>+6</sup> emissions from facilities even after closure. Since all construction activities are expected to take place at existing facilities that are already developed, implementation of the proposed project will not require or result in physically dividing an established community.

**X. b)** There are no provisions in the proposed project that would affect land use plans, policies, or regulations. Land use and other planning considerations are determined by local governments and no land use or planning requirements would be altered by the proposed project. Affected facilities would have to comply with local ordinances and land use requirements. Therefore, as already noted in the discussion under “Biological Resources,” the proposed project would not affect any habitat conservation or natural community conservation plans, or agricultural resources or operations, and would not create divisions in any existing communities. Present or planned land uses in the region would not be significantly adversely affected as a result of implementing the proposed project.

Based upon these considerations, significant adverse land use and planning impacts are not expected from the implementation of the proposed project and will not be further analyzed in this final EA. Since no significant land use and planning impacts were identified, no mitigation measures are necessary or required.

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	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>XI. MINERAL RESOURCES.</b> Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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## Significance Criteria

Project-related impacts on mineral resources will be considered significant if any of the following conditions are met:

- The project would result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
- The proposed project results in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

## Discussion

**XI. a) & b)** PAR 1156 includes requirements for owners/operators of the affected properties before and after facility closure, as well as provisions for a reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. Additionally, the proposed project would revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the Office of Environmental Health Hazard Assessment's (OEHHA) new risk assessment guidelines, revise criteria to validate duplicate particulate matter (PM) samples, and add provisions for a dust mitigation plan prior to land disturbing activities occurring on the property after facility closure. There are no provisions in the proposed project that would result in the loss of availability of a known mineral resource of value to the region and the residents of the state, or of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

Based upon these aforementioned considerations, significant mineral resources impacts are not expected from the implementation of the proposed project. Since no significant mineral resources impacts were identified, no mitigation measures are necessary or required.

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	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>XII. NOISE.</b> Would the project result in:				
a) Exposure of persons to or generation of permanent noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public use airport or private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Significance Criteria

Noise impact will be considered significant if:

- Construction noise levels exceed the local noise ordinances or, if the noise threshold is currently exceeded, project noise sources increase ambient noise levels by more than three decibels (dBA) at the site boundary. Construction noise levels will be considered significant if they exceed federal Occupational Safety and Health Administration (OSHA) noise standards for workers.
- The proposed project operational noise levels exceed any of the local noise ordinances at the site boundary or, if the noise threshold is currently exceeded, project noise sources increase ambient noise levels by more than three dBA at the site boundary.

## Discussion

**XII. a)** PAR 1156 includes requirements for owners/operators of the affected properties before and after facility closure, as well as provisions for a reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. Additionally, the proposed project would revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the Office of Environmental Health Hazard Assessment's (OEHHA) new risk assessment guidelines, revise criteria to validate duplicate particulate matter (PM) samples, and add provisions for a dust mitigation plan prior to land disturbing activities occurring on the property after facility closure. Any operational requirements imposed by the proposed project would not be expected to generate noise above the existing setting. All of the activities required by the proposed project are expected to occur at the two affected existing facilities. Thus, the proposed project is not expected to expose persons to the generation of excessive noise levels above current levels because no change in current operations is expected to occur as a result of the proposed project. It is expected that any facility affected by the proposed project would continue complying with all existing local noise control laws or ordinances.

**XII. b)** The proposed project is not anticipated to expose people to or generate excessive groundborne vibration or groundborne noise levels since no heavy construction is required for compliance with PAR 1156.

**XII. c)** A permanent increase in ambient noise levels at the affected locations above existing levels is not expected because the proposed project does not contain any operational requirements that would generate additional noise beyond existing levels. Therefore, the existing noise levels are unlikely to change and raise ambient noise levels in the vicinities of affected facilities to above a level of significance in response to implementing the proposed project.

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**XII. d)** There are no airports located within two miles of the two affected facilities and there are no new noise impacts expected as a result of the proposed project to affect the operations of the airport. Therefore, the proposed project is not expected to expose people residing or working in the affected facilities vicinities to excessive noise levels. See also the response to item XII.a).

Based upon these considerations, significant adverse noise impacts are not expected from the implementation of the proposed project and are not further evaluated in this final EA. Since no significant noise impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>XIII. POPULATION AND HOUSING.</b>				
Would the project:				
a) Induce substantial growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (e.g. through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Impacts of the proposed project on population and housing will be considered significant if the following criteria are exceeded:

- The demand for temporary or permanent housing exceeds the existing supply.
- The proposed project produces additional population, housing or employment inconsistent with adopted plans either in terms of overall amount or location.

**Discussion**

**XIII. a)** PAR 1156 includes requirements for owners/operators of the affected properties before and after facility closure, as well as provisions for a reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. Additionally, the proposed project would revise the current Cr<sup>+6</sup> ambient air monitoring fence-line threshold to reflect the Office of Environmental Health Hazard Assessment's (OEHHA) new risk assessment guidelines, revise criteria to validate duplicate particulate matter (PM) samples, and add provisions for a dust mitigation plan prior to land disturbing activities occurring on the property after facility closure. Therefore, there is no construction anticipated as a result of PAR 1156. However, if any minor modifications are necessary to the two affected facilities, it is expected that workers can be drawn from the existing labor pool in southern California. Therefore, the proposed project is not anticipated to generate any significant effects, either direct or indirect, on the District's population or population distribution as no additional operational workers are



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anticipated to be required at the affected facilities. Human population within the jurisdiction of the SCAQMD is anticipated to grow regardless of implementing the proposed project. As such, implementation of the proposed project will not result in changes in population densities or induce significant growth in population.

**XIII. b)** The affected facilities are already developed and compliance with PAR 1156 is not expected to result in the creation of any industry that would affect population growth, directly or indirectly induce the construction of single- or multiple-family units, or require the displacement of people elsewhere.

Based upon these considerations, significant adverse population and housing impacts are not expected from the implementation of the proposed project and are not further evaluated in this final EA. Since no significant population and housing impacts were identified, no mitigation measures are necessary or required.

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	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>XIV. PUBLIC SERVICES.</b> Would the proposal result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### **Significance Criteria**

Impacts on public services will be considered significant if the project results in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered government facilities, the

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construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response time or other performance objectives.

### **Discussion**

**XIV. a) & b)** Adoption of the proposed rule would minimize potential air quality impacts from cement facility closure and ensure long-term air quality and public protection, while streamlining Cr<sup>+6</sup> ambient monitoring. The proposed project includes requirements for owners/operators of the affected property before and after facility closure, as well as conditions for potential reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. There will be a compliance plan that is required if the ambient monitoring limit is exceeded. All new requirements would be expected to be compliant with fire department standards, therefore, they would not increase the risk of fire to occur. No other physical modifications or changes associated with the proposed project are expected and no flammable substances are necessary to comply with the proposed project. As such, the proposed project will not increase the chances for fires or explosions that could affect local fire departments. Finally, PAR 1156 is not expected to increase the need for security at affected facilities, which could adversely affect local police departments. Because the proposed project does not require or involve the use of new hazardous materials or generate new hazardous waste, it will not generate an emergency situation that would require additional fire or police protection, or impact acceptable service ratios or response times.

**XIV. c), d), & e)** As indicated in discussion under item XIII. Population and Housing, implementing the proposed project would not induce population growth or dispersion because no additional operational workers are expected to be needed at the existing affected facilities and construction workers will be temporary, not permanent. Therefore, with no increase in local population anticipated as a result of adopting and implementing the proposed project, additional demand for new or expanded schools or parks is also not anticipated. As a result, no significant adverse impacts are expected to local schools or parks.

Based upon these considerations, significant adverse public services impacts are not expected from the implementation of the proposed project and are not further evaluated in this final EA. Since no significant public services impacts were identified, no mitigation measures are necessary or required.

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	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>XV. RECREATION.</b>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment or recreational services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Impacts to recreation will be considered significant if:

- The project results in an increased demand for neighborhood or regional parks or other recreational facilities.
- The project adversely affects existing recreational opportunities.

**Discussion**

**XV. a) & b)** As discussed under “Land Use and Planning” (Section X) above, there are no provisions in the proposed project that would affect land use plans, policies, or regulations. Land use and other planning considerations are determined by local governments. No land use or planning requirements would be altered by the adoption of the proposed project, which only affects already developed cement producing facilities. Further, the proposed project would not affect District population growth or distribution (see “Population and Housing”- Section XIII) in ways that could increase the demand for or use of existing neighborhood and regional parks or other recreational facilities or require the construction of new or expansion of existing recreational facilities that might have an adverse physical effect on the environment because it would not directly or indirectly increase or redistribute population.

Based upon these considerations, significant recreation impacts are not expected from the implementation of the proposed project. Since no significant recreation impacts were identified, no mitigation measures are necessary or required.

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>XVI. SOLID/HAZARDOUS WASTE.</b>				
Would the project:				
a) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Comply with federal, state, and local statutes and regulations related to solid and hazardous waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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## **Significance Criteria**

The proposed project impacts on solid/hazardous waste will be considered significant if the following occurs:

- The generation and disposal of hazardous and non-hazardous waste exceeds the capacity of designated landfills.

## **Discussion**

**XVI. a) & b)** Adoption of the proposed rule would minimize potential air quality impacts from cement facility closure and ensure long-term air quality and public protection, while streamlining Cr<sup>+6</sup> ambient monitoring. The proposed project includes requirements for owners/operators of the affected property before and after facility closure, as well as conditions for potential reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. There will be a compliance plan that is required if the ambient monitoring limit is exceeded. No additional waste will be diverted to landfills as a result of the proposed project. As a result, no substantial change in the amount or character of solid or hazardous waste streams is expected to occur.

Sanitation districts forecast future landfill capacity and encourage recycling. Any portions of spent control equipment (if needed) in the future that cannot be recycled are expected to be able to be disposed of in the available landfill capacity. Additionally, no waste is expected to be generated by the proposed project. The proposed project is not expected to increase the volume of solid or hazardous wastes from the two affected facilities, require additional waste disposal capacity, or generate waste that does not meet applicable local, state, or federal regulations.

Based upon these considerations, the proposed project is not expected to increase the volume of solid or hazardous wastes that cannot be handled by existing municipal or hazardous waste disposal facilities, or require additional waste disposal capacity. Further, implementing the proposed project is not expected to interfere with any affected facility's ability to comply with applicable local, state, or federal waste disposal regulations. Since no solid/hazardous waste impacts were identified, no mitigation measures are necessary or required.

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	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<b>XVII. TRANSPORTATION/TRAFFIC.</b>				
Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impacts on transportation/traffic will be considered significant if any of the following criteria apply:

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- Peak period levels on major arterials are disrupted to a point where level of service (LOS) is reduced to D, E or F for more than one month.
- An intersection's volume to capacity ratio increase by 0.02 (two percent) or more when the LOS is already D, E or F.
- A major roadway is closed to all through traffic, and no alternate route is available.
- The project conflicts with applicable policies, plans or programs establishing measures of effectiveness, thereby decreasing the performance or safety of any mode of transportation.
- There is an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system.
- The demand for parking facilities is substantially increased.
- Water borne, rail car or air traffic is substantially altered.
- Traffic hazards to motor vehicles, bicyclists or pedestrians are substantially increased.
- The need for more than 350 employees
- An increase in heavy-duty transport truck traffic to and/or from the facility by more than 350 truck round trips per day
- Increase customer traffic by more than 700 visits per day.

#### **Discussion**

**XVII. a) & b)** Adoption of the proposed rule would minimize potential air quality impacts from cement facility closure and ensure long-term air quality and public protection, while streamlining Cr<sup>+6</sup> ambient monitoring. The proposed project includes requirements for owners/operators of the affected property before and after facility closure, as well as conditions for potential reduction in the number of Cr<sup>+6</sup> monitoring stations and elimination of Cr<sup>+6</sup> ambient monitoring under specific conditions. The additional amount of trips required for monitoring sample collection (2 per week, per facility), if required, are not expected to increase congestion or diminish the level of service of any roadways in the vicinity of the two affected facilities.

Implementation of the proposed project would not result in a net change or cause any additional transportation demands or services. Similarly, the implementation of the proposed project is not expected to adversely affect circulation patterns on local roadways or the level of service at intersections near affected facilities.

Implementation of the proposed rule amendments would not require any construction activities. Since no construction-related trips and no additional operational-related trips per facility are anticipated, the adoption of the proposed project is not expected to significantly adversely affect circulation patterns on local roadways or the level of service at intersections near affected facilities.

**XVII. c)** Adoption of the proposed rule would minimize potential air quality impacts from cement facility closure and to ensure long-term air quality and public protection, while streamlining Cr<sup>+6</sup> ambient monitoring. The proposed project will not require operators of existing facilities to construct buildings or other structures that could interfere with flight patterns, so the height and appearance of the existing structures are not expected to change. Therefore, implementation of the proposed project is not expected to adversely affect air traffic

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patterns. Further, the proposed project will not affect in any way air traffic in the region because it will not require transport of any materials by air.

**XVII. d)** No physical modifications to roadways are expected to occur by implementing the proposed project. Therefore, no offsite modifications to roadways are anticipated for the proposed project that would result in an additional design hazard or new incompatible uses.

**XVII. e)** All potential physical changes caused by implementation of the proposed project are expected to occur within the existing boundaries of the affected facilities. As a result, the proposed project is not expected to adversely impact existing emergency access.

**XVII. f)** All potential physical changes caused by implementation of the proposed project are expected to occur within the existing boundaries of the affected facilities. No changes to the parking capacity at or in the vicinity of the affected facilities are expected. Therefore, no shortage of parking spaces is expected. Further, the proposed project is not expected to require additional operational workers, so additional parking capacity will not be required. Therefore, the proposed project is not expected to adversely impact on- or off-site parking capacity. The proposed project has no provisions that would conflict with alternative transportation, such as bus turnouts, bicycle racks, et cetera.

Based upon these considerations, the proposed project is not expected to generate significant adverse project-specific or cumulative transportation/traffic impacts and, therefore, this topic will not be considered further. Since no significant transportation/traffic impacts were identified, no mitigation measures are necessary or required.



	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.</b>				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**XVIII. a)** As discussed in the “Biological Resources” section, the proposed project is not expected to significantly adversely affect plant or animal species or the habitat on which they rely because any minor physical modifications that may occur as a result of the proposed project would occur at two existing cement production facilities that have already been greatly disturbed and that currently do not support such habitats. Additionally, special status plants, animals, or natural communities are not expected to be found within close proximity to the two facilities affected by the proposed project.

**XVIII. b)** Based on the foregoing analyses, cumulative impacts in conjunction with other projects that may occur concurrently with or subsequent to the proposed project are not expected to adversely impact any environmental topic. Related projects to the currently proposed project include existing and proposed amended rules and regulations, as well as AQMP control measures, which produce emission reductions from most industrial and commercial sectors. Furthermore, because the proposed project does not generate significant project-specific impacts, cumulative impacts are not considered to be "cumulatively considerable" as defined by CEQA guidelines §15065(a)(3). For example, the environmental topics checked ‘No Impact’ (e.g., aesthetics, agriculture resources, biological resources, cultural resources, geology and soils, hazards and hazardous materials, land use and planning, mineral resources, noise, population and housing, public services, recreation, solid/hazardous waste and transportation and traffic) would not be expected to make any contribution to potential cumulative impacts whatsoever. Also, in the case of air quality impacts, the net effect of implementing the proposed project with other proposed amended rules and regulations, and AQMP control measures is an overall reduction in District-wide emissions, thus, contributing to the attainment of state and national ambient air quality standards. Therefore, it is concluded that the proposed project has no potential for significant cumulative or cumulatively considerable impacts in any environmental areas.



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**XVIII. c)** Based on the foregoing analyses, the proposed project is not expected to cause significant adverse effects to human beings. Significant adverse air quality impacts are not expected from the implementation of the proposed project. Based on the preceding analyses, no significant adverse impacts to aesthetics, agriculture resources, air quality, biological resources, cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, solid/hazardous waste and transportation and traffic are expected as a result of the implementation of the proposed project.

As discussed in items I through XVIII above, the proposed project would have no potential to cause significant adverse environmental effects.

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## APPENDIX A

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### PROPOSED AMENDED RULE 1156 - FURTHER REDUCTIONS OF PARTICULATE EMISSIONS FROM CEMENT MANUFACTURING FACILITIES

# ATTACHMENT G

(Adopted November 4, 2005)(Amended March 6, 2009)  
(Amended ~~June 5~~September 4, 2015)

(Preliminary Draft)

## **PROPOSED AMENDED RULE 1156. FURTHER REDUCTIONS OF PARTICULATE EMISSIONS FROM CEMENT MANUFACTURING FACILITIES**

(a) Purpose

The purpose of this rule is to further reduce particulate matter (PM) emissions and minimize hexavalent chromium emissions from cement manufacturing facilities operations and the property after facility closure.

(b) Applicability

This rule applies to all operations, materials handling, and transport at a cement manufacturing facility, including, but not limited to, kiln and clinker cooler, material storage, crushing, drying, screening, milling, conveying, bulk loading and unloading systems, internal roadways, material transport, and track-out. This rule also applies to owner(s)/operator(s) of the property after facility closure.

(c) Definitions

- (1) BAG LEAK DETECTION SYSTEM (BLDS) means a system that meets the minimum requirements specified under U.S. EPA 40 CFR Part 63, Subpart LLL, Section 1350 (m) to continuously monitor bag leakage and failure.
- (2) CEMENT MANUFACTURING FACILITY means any facility that engages in, or has been engaged in the operation of ~~prior to November 4, 2005,~~ producing portland cement or associated products, as defined in the Standard Industrial Classification Manual as Industry No. 3241, Portland Cement Manufacturing.
- (3) CHEMICAL DUST SUPPRESSANT means any non-toxic chemical stabilizer which is used as a treatment material to reduce fugitive dust emissions and its use is not prohibited by any other applicable law and meets all applicable specifications required by any federal, state, or local water agency.
- (4) CLINKER means a product from the kiln which is used as a feedstock to make cement.
- (5) CLINKER COOLER means equipment into which clinker product leaving the kiln is placed to be cooled by air supplied by a forced draft or natural draft supply system.

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- (6) CONVEYING SYSTEM means a device for transporting materials from one piece of equipment or location to another piece of equipment or location within a facility. Conveying systems include, but are not limited to, the following: feeders, belt conveyors, bucket elevators and pneumatic systems.
- (7) CONTINUOUS OPACITY MONITORING SYSTEM (COMS) means a system that meets minimum requirements specified under U.S. EPA 40 CFR Part 60, Appendix B, to continuously monitor opacity.
- (8) CONVEYING SYSTEM TRANSFER POINT means a point where any material including, but not limited to, feed material, fuel, clinker or product, is transferred to or from a conveying system, or between separate parts of a conveying system.
- (9) COVERED CONVEYOR is a conveyor where the top and side portion of the conveyor are covered by a removable cover to allow routine inspection and maintenance.
- (10) DUST SUPPRESSANTS are water, hygroscopic materials, or chemical stabilizers used as a treatment material to reduce fugitive dust emissions.
- (11) ENCLOSED CONVEYOR is any conveyor where the top, side and bottom portion of the conveyor system is enclosed except for points of loading and discharge and except for a removable cover to allow routine inspection and maintenance.
- (12) ENCLOSED SCREENING EQUIPMENT means screening equipment where the top portion of the equipment is enclosed, except for the area where the materials are loaded to the screening equipment.
- (13) ENCLOSED STORAGE PILE means any storage pile that is completely enclosed in a building or structure consisting of a solid roof and walls.
- (14) END OF WORK DAY means the end of a working period that may include one or more work shifts, but no later than 8 p.m.
- (15) EXISTING EQUIPMENT means any equipment, process or operation having an existing valid ~~AQMD~~SCAQMD permit that was issued prior to November 4, 2005.
- (16) FACILITY means any source or group of sources or other air contaminant-emitting activities which are subject to this rule and are located on one or more contiguous properties within the ~~AQMD~~SCAQMD, in actual physical contact or separated solely by a public roadway or other public right-of-way, and are owned or operated by the same person (or by persons under common control), or an outer continental shelf (OCS) source as determined in 40 CFR Section 55.2. Such above-described groups, if noncontiguous, but connected only by land carrying a

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pipeline, shall not be considered one facility. Sources or installations involved in crude oil and gas production in Southern California Coastal or OCS Waters and transport of such crude oil and gas in Southern California Coastal or OCS Waters shall be included in the same facility which is under the same ownership or use entitlement as the crude oil and gas production facility on-shore.

- (17) FACILITY CLOSURE occurs when all cement manufacturing operations at the facility have completely ceased and all permits associated with on-site cement manufacturing operations, such as blending silos, kilns, clinker cooler, and clinker grinding/milling, are surrendered or have expired and are no longer reinstatable.
- (18) ~~(17)~~ FINISH MILL means a roll crusher, ball and tube mill or other size reduction equipment used to grind clinker to a fine powder. Gypsum and other materials may be added to and blended with clinker in a finish mill. The finish mill also includes the air separator associated with the finish mill.
- (19) ~~(18)~~ HAUL TRUCK means a diesel heavy-duty truck that has a loading capacity equal to or greater than 50 tons.
- (20) ~~(19)~~ INACTIVE CLINKER PILE is a pile of clinker material that has not been disturbed, removed, and/or added to as a result of loading, unloading, and/or transferring activities for 30 (thirty) consecutive days.
- (21) ~~(20)~~ KILN means a device, including any associated preheater or precalciner devices that produce clinker by heating limestone and other materials for subsequent production of portland cement.
- (22) ~~(21)~~ OPEN STORAGE PILE is any accumulation of materials which attains a height of three (3) feet or more or a total surface area of one hundred fifty (150) square feet or more. The open pile is defined as inactive when loading and unloading has not occurred in the previous 30 consecutive days.
- (23) ~~(22)~~ OWNER/OPERATOR means the owner and/or operator of the cement manufacturing facility subject to this rule or, upon facility closure, the owner and/or operator of the property where the closed cement manufacturing facility is or was located unless otherwise specified.
- (24) ~~(23)~~ PAVED ROAD means a road improved by covering with concrete, asphaltic concrete, recycled asphalt, or asphalt.
- (25) ~~(24)~~ RAW MILL means a ball, tube, or vertical roller mill or other size reduction equipment used to grind materials to the appropriate size. Moisture may be added or removed from the materials during the grinding operation. A raw mill may also include a raw material dryer and/or air separator.
- (26) ~~(25)~~ ROAD means any route with evidence of repeated prior travel by vehicles.

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- ~~(26)~~ (27) **STABILIZED SURFACE** means any previously disturbed surface area or open storage pile which, through the application of dust suppressants, shows visual or other evidence of surface crusting, is resistant to being the source of wind-driven fugitive dust, and is demonstrated to be stabilized by the applicable test methods contained in the Rule 403 Implementation Handbook.
- ~~(27)~~ (28) **STREET SWEEPER** is a PM<sub>10</sub> efficient street sweeper approved pursuant to Rule 1186 – PM<sub>10</sub> Emissions from Paved and Unpaved Roads & Livestock Operations.
- ~~(28)~~ (29) **TOP PROCESS PARTICULATE EMITTERS** means:
- (A) process equipment, including but not limited to the kiln, clinker cooler, raw mill, and finish mill, vented to air pollution control equipment, except open-top baghouses, that account for 60% of the total process particulate emissions at the facility, for the requirement of using BLDS or COMS under paragraph (e)(2); or
- (B) process equipment, including but not limited to the kiln, clinker cooler, raw mill, and finish mill, vented to air pollution control equipment, that account for 80% of the total process particulate emissions at the facility for the monitoring, source testing and recordkeeping requirements under paragraph (e)(3), (e)(8) and subparagraph (f)(2)(D).
- ~~(29)~~ (30) **TRACK-OUT** means any material that adheres to and agglomerates on the exterior surface of motor vehicles, haul trucks, and equipment (including tires) that has been released onto a paved road and can be removed by a vacuum sweeper or a broom sweeper under normal operating conditions.
- ~~(30)~~ (31) **VERIFIED FILTRATION PRODUCT** means filtration products that are verified under the U.S. EPA Environmental Technology Verification program (ETV).
- ~~(31)~~ (32) **WET SUPPRESSION SYSTEM** means a system that supplies ultra-fine droplets of water or chemical dust suppressant by atomization through means of using compressed air or applying high pressure as specified by manufacturers to minimize dust.
- ~~(32)~~ (33) **WIND-DRIVEN FUGITIVE DUST** means particulate matter emissions from any disturbed surface area which is generated by wind action alone.
- ~~(33)~~ (34) **WIND FENCE** means a system consisting of a stand alone structure supporting a wind fence fabric. The wind fence fabric shall have maximum porosity of 20%.
- (d) Requirements

The owner/operator shall comply with the following requirements unless otherwise stated.

- (1) Visible Emissions
  - (A) The owner/operator of a facility shall not cause or allow the discharge into the atmosphere of visible emissions exceeding 10 percent opacity based on an average of 12 consecutive readings from any operation at the facility, except open piles, roadways and unpaved areas, using EPA Opacity Test Method 9.
  - (B) For open piles, roadways and other unpaved areas, the owner/operator of a facility shall not cause or allow the discharge into the atmosphere of visible emissions exceeding 20 percent opacity based on an average of 12 consecutive readings; or 50 percent opacity based on 5 individual consecutive readings using SCAQMD Opacity Test Method 9B.
  - (C) The owner/operator of a facility shall not cause or allow any visible dust plume from exceeding 100 feet in any direction from any operations at the facility.
- (2) Loading, Unloading, and Transferring
  - (A) The owner/operator shall conduct material loading and unloading to and from trucks, railcars, or other modes of material transportation through an enclosed system that is vented to SCAQMD permitted air pollution control equipment that meets the requirements in paragraph (d)(6) and subparagraph (d)(1)(A) and is operated during loading and unloading activities. In the event the system consists of a building, the enclosed building shall have openings with overlapping flaps, sliding doors or other equally effective devices, as approved by the Executive Officer to meet the requirement in subparagraph (d)(1)(A), which shall remain closed, except to allow trucks and railcars to enter and leave.
  - (B) The owner/operator shall cover or enclose all conveying systems and enclose all transfer points. During all conveying activities, the enclosed transfer points and enclosed conveying systems shall be vented to a permitted air pollution control device that meets the requirements in subparagraph (d)(1)(A) and paragraph (d)(6) and is operated during all conveying activities. The enclosure shall have access doors to allow routine inspection and maintenance.
  - (C) The owner/operator shall apply dust suppressants as necessary during material loading, unloading, and transferring activities, and at conveying

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- system transfer points to dampen and stabilize the materials transported and prevent visible dust emissions generated to meet the requirement in subparagraph (d)(1)(A).
- (D) The owner/operator shall install and maintain as necessary dust curtains, shrouds, belt scrapers, and gaskets along the belt conveying system to contain dust, prevent spillage and carryback in order to minimize visible emissions.
  - (E) The owner/operator shall use appropriate equipment including, but not limited to, stackers or chutes, as necessary, to minimize the height from which materials fall into storage bins, silos, hoppers or open stock piles and reduce the amount of dust generated to meet the requirements in paragraphs (d)(1) and (d)(6).
- (3) **Crushing, Screening, Milling, Grinding, Blending, Drying, Heating, Mixing, Sacking, Palletizing, Packaging, and Other Related Operations**
- (A) The owner/operator shall enclose crushing, screening, milling, grinding, blending, drying, heating, mixing, sacking, palletizing, packaging and other related operations. The enclosed system shall be vented to permitted control equipment that meets the requirements in paragraph (d)(6) and subparagraph (d)(1)(A). The control equipment shall be operated during these operations.
  - (B) In lieu of the configuration described in subparagraph (d)(3)(A), the owner/operator of a primary crusher installed and operated prior to November 4, 2005 may use wind fences on at least two sides of the primary crusher with one side facing the prevailing winds. The structure shall be equipped and operated with a wet suppression system. To implement this, the owner/operator shall submit a permit modification application by May 4, 2006 for a primary crusher to enable the Executive Officer to develop permit conditions to ensure that this air pollution control system is designed and operated to minimize particulate emissions.
  - (C) The owner/operator shall apply dust suppressants, as necessary, during all operations to dampen and stabilize the materials processed and prevent visible emissions generated to meet the requirements in subparagraph (d)(1)(A).



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- (4) Kilns and Clinker Coolers  
The owner/operator shall not operate the kilns and clinker coolers unless the kilns and clinker coolers are vented to air pollution control equipment that meets the requirements in paragraph (d)(6) and subparagraph (d)(1)(A).
- (5) Material Storage
- (A) An owner/operator that stores raw materials and products in a silo, bin or hopper shall vent the silo, bin or hopper to an air pollution control device that meets the requirements in subparagraph (d)(1)(A) and paragraph (d)(6).
- (B) No later than September 8, 2009, the owner/operator shall conduct all clinker material storage and handling in an enclosed storage area that meets the requirements in subparagraph (d)(1)(A) and paragraph (d)(6). The enclosed storage area shall have opening(s) covered with overlapping flaps, and sliding door(s) or other equivalent device(s) approved by the Executive Officer, which shall remain closed at all times, except to allow vehicles to enter or exit. Prior to the completion and operation of the enclosure, all clinker materials shall be stored and handled in the same manner as non-clinker materials as set forth in subparagraph (d)(5)(D).
- (C) If clinker material storage and handling activities occur more than 1,000 feet from, and inside, the facility property-line, the owner/operator may comply with all of the following in lieu of the requirements of subparagraph (d)(5)(B) no later than September 8, 2009:
- (i) Utilize a three-sided barrier with roof, provided the open side is covered with a wind fence material of a maximum 20% porosity, allowing a removable opening for vehicle access. The removable wind fence for vehicle access may be removed only during minor or routine maintenance activities, the creation or reclamation of outside storage piles, the importation of clinker from outside the facility, and reclamation of plant clean-up materials. The removable opening shall be less than 50% of the total surface area the wind fence and the amount of time shall be minimized to the extent feasible;
- (ii) Storage and handling of material that is immediately adjacent to the three-sided barrier due to space limitations inside the structure shall be contained within an area next to the structure with a wind fence on at least two sides, with at least a 5 foot freeboard above

- the top of the storage pile to provide wind sheltering, and shall be completely covered with an impervious tarp, revealing only the active disturbed portion during material loading and unloading activities;
- (iii) Storage and handling of other active clinker material shall be conducted within an area surrounded on three sides by a barrier or wind fences with one side of the wind fence facing the prevailing wind and at least a 5-foot freeboard above the top of the storage pile to provide wind sheltering. The clinker shall remain completely covered at all times with an impervious tarp, revealing only the active disturbed portion during material loading and unloading activities. The barrier or wind fence shall extend at least 20 feet beyond the active portion of the material at all times; and
  - (iv) Inactive clinker material may be alternatively stored using a continuous and impervious tarp, covered at all times, provided records are kept demonstrating the inactive status of such stored material.
- (D) For active open non-clinker material storage and handling, the owner/operator shall comply with one of the following to meet the requirements of subparagraphs (d)(1)(B) and (d)(1)(C):
- (i) Apply chemical dust suppressants to stabilize the entire surface area of the pile, except for areas of the pile that are actively disturbed during loading and unloading activities; or
  - (ii) Install and maintain a three-sided barrier or wind fences with one side facing the prevailing winds and with at least two feet of visible freeboard from the top of the storage pile to provide wind sheltering, maintain surface stabilization of the entire pile in a manner that meets the performance standards of subparagraphs (d)(1)(B) and (d)(1)(C), and store the materials completely inside the three-sided structure at all times; or
  - (iii) Install and maintain a three-sided barrier with roof, or wind fences with roof, to provide wind sheltering; maintain the open-side of the storage pile stabilized in a manner that meets the performance standards of subparagraphs (d)(1)(B) and (d)(1)(C), and store the materials completely inside the three-sided structure at all times; or
  - (iv) Install and maintain a tarp over the entire surface area of the storage pile, in a manner that meets the performance standards of

subparagraphs (d)(1)(B) and (d)(1)(C), except for areas of the pile that are actively disturbed during loading and unloading activities.

The tarp shall remain in place and provide cover at all times.

- (E) All inactive non-clinker piles shall be stored and handled in the same manner as non-clinker materials, as set forth in subparagraph (d)(5)(D). The owner/operator shall keep records demonstrating the inactive status of the non-clinker piles.
  - (F) For open storage piles subject to subparagraph (d)(5)(D), the owner/operator shall apply chemical dust suppressants or dust suppressants during any material loading and unloading to/from the open piles; and re-apply chemical dust suppressants or dust suppressants to stabilize the disturbed surface areas of the open piles at the end of each work day in which loading and unloading activities were performed to meet the performance standards of subparagraphs (d)(1)(B) and (d)(1)(C) .
- (6) Air Pollution Control Device
- (A) The owner/operator shall install and maintain an air pollution control system referred to in paragraphs (d)(2), (d)(3), (d)(4) and (d)(5) to meet the following performance standards measured with the approved source test in subdivision (g):
    - (i) an outlet concentration of 0.01 grain PM per dry standard cubic feet for equipment installed prior to November 4, 2005; and
    - (ii) a BACT outlet concentration not to exceed 0.005 grain PM per dry standard cubic feet for equipment installed on and after November 4, 2005.
  - (B) The owner/operator shall install and maintain a baghouse ventilation and hood system that meets a minimum capture velocity requirement specified in the applicable standards of the U.S. Industrial Ventilation Handbook, American Conference of Governmental Industrial Hygienists, at the time of installation. If modification to the baghouse ventilation and hood system is required to meet the applicable standard, the owner/operator shall be granted additional time up to December 31, 2006 to complete this process.
  - (C) The owner/operator shall meet the requirements in paragraph (d)(6) by December 31, 2006 for pulse-jet baghouses, and by December 31, 2010 for non-pulse-jet baghouses.

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- (D) To show incremental progress towards the December 31, 2010 compliance date for non-pulse-jet baghouses, the owner/operator shall submit to the Executive Officer a list of baghouse candidates for future modification or replacement by December 31, 2006. In addition, the owner/operator shall submit a notification letter by December 31 of each year thereafter, starting in 2006, to demonstrate that the owner/operator has completed at least 20% of the modification or replacement by 2006; 40% by 2007; 60% by 2008, 80% by 2009; and 100% by 2010.
- (7) Internal Roadways and Areas
- (A) Unpaved Roadways and Areas
- (i) For haul roads used by haul trucks to carry materials from the quarry to different locations within the facility, the owner/operator shall apply chemical dust suppressants in sufficient quantity and at least twice a year to stabilize the entire unpaved haul road surface; post signs at the two ends stating that haul trucks shall use these roads unless traveling to the maintenance areas; and enforce the speed limit of 35 miles per hour or less to comply with the opacity limits in paragraph (d)(1).
- (ii) For other unpaved roadways and areas, the owner/operator shall apply chemical dust suppressants in sufficient quantity and at least twice a year to stabilize the surface, or apply gravel pad containing 1-inch or larger washed gravel to a depth of six inches; and enforce a speed limit of 15 miles per hour or less to comply with the opacity limits in paragraph (d)(1).
- (B) Paved Roads
- The owner/operator shall sweep all internal paved roads at least once each regular work day or more frequently if necessary to comply with the opacity limits in paragraph (d)(1). Sweeping frequency may be reduced on weekends, holidays, or days of measurable precipitation provided that the owner/operator complies with the opacity limits in paragraph (d)(1) at all times. Sweepers purchased or leased after November 4, 2005 shall be Rule 1186-certified sweepers.
- (8) Track-Out
- (A) The owner/operator shall pave the closest 0.25 miles of internal roads leading to the public roadways and ensure that all trucks use these roads

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exclusively when leaving the facility to prevent track-out of dust to the public roadways and to comply with the opacity limits in paragraph (d)(1).

- (B) If necessary to comply with the opacity limits in paragraph (d)(1), the owner/operator shall install a rumble grate, truck washer, or wheel washer; and ensure that all trucks go through the rumble grate, truck washer or wheel washer such that the entire circumference of each wheel or truck is cleaned before leaving the facility.
- (C) To prevent material spillage from trucks to public roadways and fugitive dust emissions during transport, a truck driver on the facility shall ensure that the cement truck hatches are closed and there is no track-out, and the owner/operator shall provide truck cleaning facilities on-site.
- (D) The owner/operator shall provide, at least once each calendar year, the “Fugitive Dust Advisory” flyers prepared by the District to any company doing business with the facility and which is subject to the requirements in subparagraph (d)(8)(C).

#### (9) No Backsliding

To prevent any backsliding from the current level of control, the owner/operator shall operate and maintain all existing equipment according to permit conditions stated in the permits approved by the Executive Officer prior to November 4, 2005 at all times.

#### (10) Compliance Monitoring Plan

- (A) No later than June 8, 2009, the owner/operator shall submit to the Executive Officer a complete compliance plan for wind monitoring and the monitoring, sampling, and analysis of hexavalent chromium, and pay a plan evaluation fee pursuant to Rule 306 – Plan Fees. The submitted plan will be disapproved if it does not meet the provisions of subparagraph (d)(10)(B). The owner/operator shall resubmit an approvable plan within 30 days from date of disapproval; otherwise, the owner/operator shall be deemed in violation of this provision.
- (B) The monitoring plan submitted shall contain, at a minimum, the following:
  - (i) Siting and monitoring protocols that comply with EPA’s and CARB’s guidance and/or protocols for measurement of hexavalent chromium, wind direction, and wind speed. A minimum of three fence-line monitoring stations are required for hexavalent chromium: one upwind and one downwind of the facility under the common prevailing wind directions, and one subject to approval by

the Executive Officer to ensure maximum effectiveness of the monitoring to the most potentially affected receptor, such as nearest residential or business receptors relative to clinker storage areas or potential hexavalent chromium emitting sources.

- (ii) Breakdown provisions which include: (1) a statement that the owner/operator will notify the Executive Officer in writing of the breakdown within 24 hours of its occurrence. If the breakdown occurs on a Friday, over a weekend, or on a national or state holiday observed by the facility, the facility shall report such breakdown on the following work day; (2) a repair schedule; and (3) an action plan with detailed measures to be taken by the owner/operator to ensure that there will be at least 70% data capture at each site by each monitoring system;
  - (iii) Consent from the owner/operator that allows the Executive Officer to conduct any co-located or audit sampling at any time;
  - (iv) Sampling analysis protocols that comply with EPA and CARB's appropriate guidance and/or protocols for hexavalent chromium. All samples shall be analyzed at a District-approved laboratory, which can be audited at any time; and
  - (v) Any other relevant data and information required by the Executive Officer.
- (C) The Executive Officer shall approve or disapprove the complete plan within 60 days from the submittal date.
- (D) The owner/operator may file for a compliance monitoring plan amendment in the future relative to monitor siting or other elements of the plan as more site-specific data becomes available.
- (11) Hexavalent Chromium Monitoring and Other Requirements
- (A) No later than six months from compliance plan approval or March 1, 2010, whichever occurs first, the owner/operator of a cement manufacturing facility shall conduct hexavalent chromium ambient air monitoring as follows:
- (i) The owner/operator shall conduct ambient air monitoring for hexavalent chromium in accordance with the approved monitoring plan set forth in subparagraph (d)(10)(B) or (d)(10)(D), as applicable. The hexavalent chromium concentration from a 30-day rolling average at each monitoring station shall not exceed 0.70

nanograms per cubic meter (ng/m<sup>3</sup>), excluding background. 24-hour sampling shall be conducted once every third day according to the EPA 1-in-3-day sampling calendar. For monitoring sample retrieval in which collection occurs on a weekend or facility observed national or state holiday, the sample may be collected the following business day.

(ii) The owner/operator may conduct 24-hour sampling once every six days for hexavalent chromium if there is no single exceedance of the 0.70 ng/m<sup>3</sup> level during 12 continuous months of monitoring. On this sampling schedule, the hexavalent chromium concentration from a 90-day rolling average at each monitoring station shall not exceed 0.70 ng/m<sup>3</sup>, excluding background. If there is an confirmed exceedance while on this sampling schedule, sampling shall ~~immediately~~ revert back to once every three days. For monitoring sample retrieval in which collection occurs on a weekend or facility observed national or state holiday, the sample may be collected the following business day. Reverting back to the more frequent sampling schedule stated in clause (d)(11)(A)(i) due to an exceedance of the threshold must occur immediately once the Executive Officer confirms through wind event or other relevant data, as necessary, that the facility is the source of the emissions.

(iii) After (date of adoption) and upon a subsequent 12 consecutive months of demonstrating less than the hexavalent chromium thresholds in clauses (d)(11)(A)(i) or (ii) as applicable, the owner/operator may submit for approval an amended compliance monitoring plan to operate a minimum of one monitoring station at a location in the predominantly downwind direction from the emission source(s). If the applicable thresholds in clauses (d)(11)(A)(i) or (ii) are exceeded and the facility is confirmed to be the source of the emissions, the owner/operator shall immediately revert back to the originally approved compliance plan stated in subparagraph (d)(10)(B).

(B) Effective September 5, 2016, the ambient hexavalent chromium concentration from a 30-day or 90-day rolling average, as applicable, at each monitoring station in subparagraph (d)(11)(A) shall not exceed 0.20 ng/m<sup>3</sup>, excluding background. All other provisions of subparagraph (d)(11)(A) continue to apply.

(C) Upon any confirmed hexavalent chromium exceedance that occurs after September 5, 2016, the owner/operator shall submit for approval a compliance plan and pay applicable fees pursuant to Rule 306 – Plan Fees. The plan shall include detailed descriptions of all feasible measures being utilized or that will be utilized to reduce hexavalent chromium emissions at the facility to demonstrate increments of progress as quickly as possible. The plan shall include, but not be limited to, the following information:

(i) The name(s), address(es), and phone number(s) of the person(s) responsible for the preparation, submittal, and implementation of the plan;

(ii) A description of the activities, including a map depicting the location of the site, notating any defining landmarks or demarcations;

(iii) A listing of all potential sources of fugitive dust emissions within the property lines;

(iv) The owner/operator shall describe the implementation of all applicable dust control measures listed in Rule 403 – Fugitive Dust, and maintain compliance with the rule requirements;

(v) A description of the control or other stabilization measures that will be applied to each of the sources. The description must be sufficiently detailed to demonstrate that all feasible measures will be utilized.

In the event that the fence-line risk cannot be brought below the threshold after implementation of the plan, the owner/operator shall submit a revised plan to meet the standard.

(12) Particulate Matter (PM10) Monitoring and Other Requirements

The owner/operator of the cement manufacturing facility who accrues three or more approved notices of violation for an exceedance of the upwind/downwind level specified in Rule 403 within a 36-month period shall conduct PM10 ambient air monitoring. An amendment to the compliance monitoring plan to include PM10 monitoring protocols and procedures shall be filed within 90 days of the date of the third approved notice of violation. The monitoring equipment shall be installed and operated within 6 months from the date of modified plan approval and no later than one year from the date of the third approved notice of violation.



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- (A) The owner/operator shall conduct continuous and real-time ambient air monitoring for PM10, using a continuous monitoring system, in accordance with a monitoring plan approved by the Executive Officer in a manner as set forth in subparagraphs (d)(10)(B) or (d)(10)(D), as applicable. The differences of PM10 concentrations from any two monitoring sites which represent upwind and downwind concentrations shall not exceed the amount and averaging time period specified in Rule 403.
  - (B) The owner/operator shall apply dust suppressants on all openly stored non-clinker materials, unpaved roads, and unpaved areas within the facility, as well as take steps to decrease clinker dust, if the PM10 difference(s) set forth in Rule 403 are exceeded at any time.
- (13) Wind Monitoring
- (A) No later than September 8, 2009, the owner/operator shall install and operate wind monitoring equipment to conduct hourly wind monitoring according to a protocol approved by the Executive Officer.
  - (B) On and after the date of operation of the wind monitoring equipment pursuant to subparagraph (d)(13)(A), the owner/operator shall cease all open handling of clinker material for a two-hour period in the event that instantaneous wind speeds exceed 25 miles per hour (mph), and if such wind speeds subsequently exceed 25 mph, a new two-hour period shall begin. During the aforementioned two-hour period, the facility would be exempt from the requirement of subparagraph (d)(1)(C) if the open handling of clinker material is ceased, provided that dust controls as required by District rules are applied; and unpaved roads are stabilized upon register of the high wind event via the wind monitoring equipment.
- (e) Monitoring and Source Testing
- (1) For the kilns and clinker coolers, the owner/operator shall continuously monitor and record operating parameters including, but not limited to, flue gas flow rates and pressure drops across the baghouses to monitor baghouse performance and ensure compliance with the opacity limit in subparagraph (d)(1)(A).
  - (2) For all new baghouses greater than or equal to 10,000 actual cubic feet per minute, and for all existing baghouses of the top process particulate emitters as defined under subparagraph (c)(28)(A), the owner/operator shall install, operate,

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- calibrate and maintain a COMS or BLDS to monitor baghouse performance and ensure compliance with the opacity limit in subparagraph (d)(1)(A).
- (3) The owner/operator shall conduct visible emission observations with EPA Method 22 for process equipment equipped with air pollution control equipment at the following frequency:
    - (i) Weekly for top process particulate emitters defined under subparagraph (c)(28)(B) that are not equipped with BLDS or COMS;
    - (ii) Monthly for top process particulate emitters defined under subparagraph (c)(28)(B) that are equipped with BLDS or COMS; and
    - (iii) Monthly for other process equipment.
  - (4) The owner/operator shall monitor and record pertinent operating parameters, such as pressure drops, according to the Operation and Maintenance Procedure in paragraph (e)(12) to monitor the performance of air pollution control equipment and ensure compliance with the opacity limit in subparagraph (d)(1)(A).
  - (5) If the owner/operator receives an alarm from the BLDS, or COMS, the owner/operator shall immediately conduct an EPA Method 22 test and implement all necessary corrective actions to minimize emissions.
  - (6) If the owner/operator observes visible emissions during any EPA Method 22 test, the owner/operator shall immediately implement all necessary corrective actions to minimize emissions, and conduct EPA Method 9 test within one hour of any observation of visible emissions.
  - (7) For the kilns and clinker coolers, the owner/operator shall conduct an annual compliance source test in accordance with the test methods in subdivision (g) to demonstrate compliance with the emission limit(s) in subdivision (d). The first annual compliance source test in accordance with an approved source test protocol shall be conducted within ninety (90) calendar days after the compliance date specified in subdivision (d). The owner/operator shall submit a source test protocol to the Executive Officer no later than sixty (60) calendar days prior to the proposed test date for the Executive Officer's approval for the first compliance source test. The testing frequency may be reduced to once every 24 calendar months if the two most recent consecutive annual source tests demonstrate compliance with the limits. Upon notification by the Executive Officer, the testing frequency shall be reverted back to annual testing if any subsequent source test fails to demonstrate compliance with the limits. In lieu of annual testing, any owner/operator who elects to use all verified filtration products in its baghouses shall conduct a compliance test every five years.

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**Rule 1156 (Cont.)**  
**(Preliminary Draft)**

~~(Amended March 6 June 5 September 4, 2009 2015)~~

- (8) By February 4, 2006, the owner/operator shall provide the Executive Officer a list of the top process particulate emitters as defined under subparagraph (c)(28)(B), and the proposed testing schedule for these equipment. The owner/operator shall conduct compliance source tests on representative baghouses within each process system and submit test results for these processes every 5 years, with at least two source tests conducted in any calendar year. If there are any changes to the list of equipment to be tested or the testing schedule, the owner/operator shall notify the Executive Officer 60 calendar days before the test date.
- (9) The owner/operator shall not be required to test non-operational equipment, which is not in operation for at least 6 consecutive months prior to scheduled testing, as indicated in paragraph (e)(8) provided that the owner/operator shall conduct such test within one month after resuming operation.
- (10) During any compliance source test, the owner/operator shall monitor and record, at a minimum, all operating data for the selected operating parameters of the control equipment and the process equipment and submit this data with the test report.
- (11) The owner/operator shall submit a complete test report for any compliance source test to the Executive Officer no later than sixty (60) calendar days of completion of the source test.
- (12) Operation and Maintenance Procedures
  - (A) The owner/operator shall develop and implement an Operation and Maintenance Procedure to ensure that the performance of the air pollution control equipment is continuously maintained and operated. The Operation and Maintenance Procedure shall include, at a minimum, information on monitoring and recordkeeping procedures, routine maintenance procedures, corrective and preventive actions for the air pollution control equipment, and training related to EPA Method 22, EPA Opacity Test Method 9 and ~~AQMD~~SCAQMD Opacity Test Method 9B, and other applicable information to demonstrate compliance with this rule.
  - (B) The owner/operator shall develop and implement an Operation and Maintenance Procedure that would require sufficient maintenance of internal roadways and areas, prompt cleanup of any pile of material spillage or carry-back, and application of chemical dust suppressant or other dust control methods to maintain surface stabilization of the open piles, spillage and carry-back to ensure compliance with the opacity standards in paragraph (d)(1) at all times.

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**Rule 1156 (Cont.)**  
**(Preliminary Draft)**

~~(Amended March 6 June 5 September 4, 2009 2015)~~

- (C) The owner/operator shall develop and maintain the Operation and Maintenance Procedures described under subparagraphs (e)(12)(A) and (e)(12)(B) within 6 months after November 4, 2005, and shall make the Operation and Maintenance Procedures available to the Executive Officer upon request.
- (f) Reporting and Recordkeeping
- (1) The owner/operator shall maintain all records and information required to demonstrate compliance with the provisions of this rule in a manner approved by the Executive Officer for a period of at least five years which shall be made available to the Executive Officer upon request.
- (2) The owner/operator of a facility shall keep, at a minimum, the following records to demonstrate compliance:
- (A) Daily records of applying chemical dust suppressants, watering, sweeping and cleaning activities;
- (B) Appropriate records, on at least a monthly basis, for primary crushers, kilns, raw mills, and finish mills, production records of clinkers and cements and records of raw materials delivered to the facility in order to determine emissions;
- (C) Test reports to demonstrate compliance with the emission standards in subdivision (d) including, but not limited to, PM emission rates, and opacity readings;
- (D) Records of equipment malfunction and repair for the air pollution control equipment of the top process particulate emitters specified under subparagraph (c)(28)(B);
- (E) Daily records of all material handling, including loading and unloading, and storage pursuant to paragraphs (d)(2) and (d)(5);
- (F) Monitoring data pursuant to subparagraphs (d)(11), and (d)(12) as applicable, and supporting documentation, including, but not limited to chains of custody and laboratory results;
- (G) Hourly records of wind speed and direction pursuant to subparagraph (d)(13);
- (H) Records of all maintenance activities pursuant to clause (d)(5)(C)(i) and paragraph (i~~h~~)(7), including any equipment testing after the repairs and duration of wind fence removal;

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### Rule 1156 (Cont.) (Preliminary Draft)

- (I) Records of clinker pile reclamation, importation, and transport pursuant to clause (d)(5)(C)(i), including duration of wind fence removal; and
  - (J) Records of all vehicle traffic and monthly average road trips pursuant to paragraph (i)(4).
- (3) Monitoring data shall be reported monthly to, and in an electronic format specified by, the Executive Officer. In the event the facility owner/operator finds that an exceedance of the levels specified in subparagraphs (d)(11)(A), (d)(11)(B), or (d)(12)(A) as applicable has occurred, the owner/operator shall report in writing such finding to the Executive Officer, and follow up with a phone call the next business day after such finding.
- (g) Test Methods and Calculation
- (1) The owner/operator shall use the following source test methods, as applicable, to determine the PM emission rates. All source test methods referenced below shall be the most recent version issued by the respective organization. All test results in units of grains/dscf shall be determined as before the addition of any dilution or air, if present, that was not a part of the stream(s) processed by the device that was tested.
    - (A) SCAQMD Source Test Method 1.1 or 1.2 – Velocity and Sample Traverse Points;
    - (B) SCAQMD Source Test Method 2.1 or 2.3 – Stack Gas Flow Rate;
    - (C) SCAQMD Source Test Method 3.1 – Stack Gas Density;
    - (D) SCAQMD Source Test Method 4.1 – Stack Gas Moisture;
    - (E) SCAQMD Source Test Method 5.2 or 5.3 - Determination of Particulate Matter Emissions in which reagent grade acetone shall be used to recover samples from the components of the sampling train located before the particulate filter;
    - (F) EPA Source Test Method 5 with the impinger analysis may be used in lieu of SCAQMD Source Test Method 5.2 or 5.3.
    - (G) EPA Source Test Method 5D with the impinger analysis may be used to measure PM emissions from positive pressure fabric filters.
  - (2) Measurement of particulate matter emissions from the cement kiln shall provide for a correction of sulfur dioxide emissions collected in the particulate matter samples. Any measured gaseous sulfur dioxide emissions shall be excluded from the measurement of particulate matter emissions by subtracting from the mass of material collected in any impingers a mass equivalent to the amount of measured

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sulfur dioxide emissions based upon sulfuric acid dihydrate as specified in SCAQMD Source Test Methods 5.2 or 5.3.

- (3) Source tests for PM shall be taken and the average of the samples shall be used to determine the applicable emission rate in accordance with the following requirements:
  - (A) Simultaneous duplicate samples shall be obtained unless the owner/operator demonstrates to the satisfaction of the Executive Officer that it is not physically feasible to do so, in which case the owner/operator shall take sequential triplicate samples;
  - (B) All samples must have minimum sampling volume of 120 cubic feet or a minimum PM catch of 6 milligrams per sample shall be collected;
  - (C) ~~For duplicate samples, the source test shall be deemed invalid~~ valid if:
    - (i) both samples are below 0.002 grain/dscf; or
    - (ii) the difference between the two samples is ~~greater-less~~ than 35% of the average of the two samples in the applicable units specified in subdivision (d) and if the difference between the sample catches normalized to the average sampling volume is ~~greater-less~~ than 3.5 milligrams. If the source test is deemed invalid, the test shall be repeated; and
  - (D) For triplicate samples, upon approval of the Executive Officer or designee, if the owner/operator can demonstrate that the process conditions including, but not limited to, the throughput, quantity, type, and quality of all feedstock to the equipment process, and the emission control equipment conditions have not changed throughout the sequential test period, then the owner/operator may apply the Dixon outlier test at the 95% significance level to check for and discard one outlier, and shall use the average of the two remaining samples to determine PM emissions.
- (4) The owner/operator may use alternative or equivalent source test methods, as defined in U.S. EPA 40 CFR 60.2, if they are approved in writing by the Executive Officer, the California Air Resources Board, and the U.S. Environmental Protection Agency.
- (5) The owner/operator shall use a test laboratory approved under the SCAQMD Laboratory Approval Program for the source test methods cited in this subdivision if such approved lab exists. If there is no approved laboratory, then approval of the testing procedures used by the laboratory shall be granted by the Executive

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Officer on a case-by-case basis based on appropriate SCAQMD protocols and procedures.

- (6) The owner/operator shall use the methods specified in the SCAQMD Rule 403 Implementation Handbook to determine threshold friction velocity and stabilized surface; and EPA Opacity Test Method 9 and Method 22, or SCAQMD Opacity Test Method 9B to determine opacity.
- (7) When more than one source test method or set of source test methods are specified for any testing, the application of these source test methods to a specific set of test conditions is subject to approval by the Executive Officer. In addition, a violation established by any one of the specified source test methods or set of source test methods shall constitute a violation of the rule.

### (h) Requirements After Facility Closure

- (1) After facility closure, the owner/operator shall continue hexavalent chromium ambient monitoring in accordance with their most recently approved monitoring plan and sampling schedule, and comply with the requirements set forth in subparagraphs (d)(11)(A) or (d)(11)(B), as applicable.
- (2) Effective (date of adoption), the owner/operator may seek SCAQMD approval to cease the hexavalent chromium ambient monitoring if no confirmed exceedance of the applicable hexavalent chromium threshold in subparagraphs (d)(11)(A) or (d)(11)(B) occurs during the most recent consecutive twelve (12) month period of monitoring.
- (3) In the event of any temporary relocation of ambient hexavalent chromium monitor(s), the owner/operator shall notify the SCAQMD in writing and obtain Executive Officer's approval prior to such relocation and shall move the monitor(s) back to the original location(s) or other approved locations(s) within the timeframe specified by the SCAQMD.
- (4) The owner/operator shall allow the SCAQMD to conduct co-located hexavalent chromium ambient monitoring and soil sampling as needed.
- (5) The owner/operator shall submit a dust mitigation plan and receives written approval from the Executive Officer prior to any change in land use or disturbance activities occur and pay applicable filing and evaluation fees pursuant to Rule 306 – Plan Fees. The dust mitigation plan must contain, but is not limited to, the following information:
  - (A) The name(s), address(es), and phone number(s) of the person(s) responsible for the preparation, submittal, and implementation of the plan;

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- (B) A description of the activities to be conducted, including a map depicting the location of the site, notating any defining landmarks or demarcations;
- (C) A list of all potential sources of fugitive dust emissions within the property lines, including but not limited to any demolition of existing structures, construction of new structures, and any grading and/or paving of the existing property;
- (D) A protocol for soil sampling and hexavalent chromium compliance monitoring. The protocol shall consist of proposed frequency and threshold for soil sampling and a hexavalent chromium compliance monitoring plan consistent with paragraph (d)(10);

  - (i) Soil sampling and hexavalent chromium monitoring shall be conducted before, during, and after any land disturbance activities, including, but not limited to demolition, construction, grading, and paving activities at the property;
  - (ii) The property shall be stabilized upon evidence of hexavalent chromium in excess of local background soil concentration levels found through such sampling and monitoring;

The owner/operator may request a reduction in the number of hexavalent chromium ambient monitoring stations, and/or reduced frequency of soil sampling and hexavalent chromium ambient monitoring appropriate to the scope of the activities.
- (E) The owner/operator shall describe the implementation of all applicable dust control measures listed in Rule 403 – Fugitive Dust, and maintain compliance with the rule requirements.
- (F) A description of the control or other stabilization measures that will be applied to each of the sources. The description must be sufficiently detailed to demonstrate that the applicable best available control measures or reasonably available control measures will be utilized and/or installed during all periods of active operations.
- (6) The owner/operator may, after facility closure, conduct and submit a site-specific assessment identifying areas of potential hexavalent chromium contamination using soil sampling, historic site activity, or other means. If approved by the Executive Officer, those areas determined not to be potentially contaminated may be excluded from the Dust Mitigation Plan Requirements.



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- (7) Subsequent owners/operator of the property where the closed cement manufacturing facility is or was located shall comply with subdivision (h) of this rule.
  - (8) The owner/operator shall comply with appropriate site-specific requirements from other agencies.
  - (9) The owner/operator shall work with other local agencies to ensure that any and all required mitigations/actions are met, including but not limited to, those required under the CEQA process.
- (hi) Exemptions
- (1) The owner/operator is exempt from installing a three-sided barrier or enclosure, or using the test methods in the SCAQMD Rule 403 Implementation Handbook for the demonstration of surface stabilization for open storage piles if 90% of the pile's mass consists of materials that are larger than ½ inch. Applicability of this exemption shall be determined through the measurement of any composite sample of at least 10 pounds taken from a minimum depth of 12 inches below the pile surface, and from various locations in the pile, but not from within 12 inches from the base of the pile. This exemption is limited to open storage piles that contain only materials other than clinker, providing that such piles meet the performance standards in subparagraphs (d)(1)(B) and (d)(1)(C).
  - (2) The owner/operator is exempt from the use of chemical dust suppressants for internal unpaved roads if the use of applicable chemical dust suppressants on that specific unpaved road violates the rules and/or regulations of the local Water Quality Control Board or other government agency provided the owner/operator uses water in sufficient quantity and frequency to stabilize the road surface and the owner/operator notifies the Executive Officer in writing 30 days prior to the use of water.
  - (3) Haul trucks are not required to use designated roads for haul trucks if they travel on unpaved roads complying with the requirements in clause (d)(7)(A)(ii).
  - (4) The owner/operator is exempt from the use of chemical dust suppressants in clause (d)(7)(A)(ii) where a road is used less than a monthly average of twice a day by a designated vehicle at a speed limit less than 15 miles per hour.
  - (5) The owner/operator is exempt from the use of chemical dust suppressants on unpaved areas specified in clause (d)(7)(A)(ii) during a period for demolition activities of no longer than six (6) calendar months provided that the owner/operator uses water in sufficient quantity and frequency to stabilize the

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unpaved areas, meets the opacity requirements in subparagraphs (d)(1)(B) and (C) at all times, and keeps sufficient records to demonstrate compliance.

- (6) With the exception of primary crushing, open material storage piles, and covers and existing enclosures for conveying systems, the provisions of this rule shall not apply to equipment or operations that are subject to Rule 1157 or Rule 1158 located at the cement manufacturing facilities, provided that there is no backsliding from the current level of control as stated in the permits approved by the Executive Officer prior to November 4, 2005 or as required under Rule 1157 and Rule 1158, whichever is more stringent.
- (7) The owner/operator is exempt from the requirements in clause (d)(5)(C)(i) in the event the wind fence material needs to be removed to perform periodic maintenance of the clinker crane or building. During the time the wind fence material is removed, the clinker crane shall not actively transport clinker material in the building, except for post maintenance equipment testing.
- (8) During day(s) in which the instantaneous wind speeds exceed 25 mph using the on-site wind monitoring equipment pursuant to (d)(13)(A), the owner/operator is exempt from the hexavalent chromium and PM10 averaging provisions of subparagraphs (d)(11)(A) and (d)(11)(B), and (d)(12)(A) as applicable, provided all open handling of clinker material is ceased and dust controls are applied pursuant to subparagraph (d)(13)(B). If the Executive Officer determines a significant potential of re-entrained hexavalent chromium containing dust from the facility exists during such high wind events, the owner/operator shall implement an approved Mitigation Monitoring Plan to minimize exposure to the surrounding area and to ensure implementation of all applicable dust control measures to meet the requirements of subparagraphs (d)(11)(A) and (d)(11)(B), and (d)(12)(A), as applicable. The Mitigation Monitoring Plan is due 90 days, inclusive of appropriate plan fees pursuant to Rule 306, after notification by the Executive Officer.

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## APPENDIX B

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### CONSTRUCTION EMISSION CALCULATIONS

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## Construction Emissions

### Installation of Plastic Shrouding / Partioning Material at Affected Facilities

#### Installation of Limited Dust Controls at 2

#### Affected Cement Manufacturing Facilities Construction Activity

#### Installing Plastic Shrouding / Partitioning Material around Bagging Operations and Doors

#### Construction Schedule - "Worst-case" Complete Installation at 2 Locations Simultaneously

Activity	Equipment Type	No. of Equipment	Hrs/day	Crew Size
On-Road Mobile Source Operations	Delivery Truck	2	-	2
On-Road Mobile Source Operations	Worker Vehicle	10	-	20

- Deliver the control materials

- Install Shrouding / Partitioning Materials

Construction Vehicle (Mobile Source) Emission Factors for Years 2010	VOC	CO	NOx	SOx	PM10	PM2.5	CO2	CH4
Construction Related Activity	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile
Offsite (Construction Worker Vehicle)	0.00066355	0.00614108	0.00060188	0.00001070	0.00009259	0.00006015	1.10192837	0.00005923
Offsite (Equipment Delivery Truck - HHDT)	0.00178608	0.00766891	0.02122678	0.00004082	0.00104715	0.00087977	4.20902225	0.00008369

Source: EMFAC 2007 (v2.3) Emission Factors (On-Road Vehicles, Scenario Year 2015)

Composite Emission Factors for Passenger Vehicle and Heavy-Heavy Duty Trucks for Scenario Year 2015

[http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/emfac-2007-\(v2-3\)-emission-factors-\(on-road\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/emfac-2007-(v2-3)-emission-factors-(on-road))

#### Construction Worker Number of Trips and Trip Length

Vehicle	No. of One-Way Trips/Day	Trip Length (miles)
Offsite (Construction Worker)	20	25
Offsite (Delivery/Haul Truck - HHDT)	4	50

#### Incremental Increase in Offsite Combustion Emissions from Construction Vehicles

Equation: Emission Factor (lb/mile) x No. of One-Way Trips/Day x Number of workers x Trip length (mile) = Offsite Construction Emissions (lbs/day)

Vehicle	VOC	CO	NOx	SOx	PM10	PM2.5	CO2	CH4
	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day
Offsite (Construction Worker Vehicle)	0.33	3.07	0.30	0.01	0.05	0.03	550.96	0.03

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## Construction Emissions

Offsite (Delivery/Haul HHDT)	0.36	1.53	4.25	0.01	0.21	0.18	841.80	0.02
<b>Vehicle TOTAL</b>	<b>0.69</b>	<b>4.60</b>	<b>4.55</b>	<b>0.01</b>	<b>0.26</b>	<b>0.21</b>	<b>1392.77</b>	<b>0.05</b>

### Total Incremental Combustion Emissions from Construction Activities (Construction Equipment, Trucks and Workers' Vehicles)

	VOC lb/day	CO lb/day	NOx lb/day	SOx lb/day	PM10 lb/day	PM2.5 lb/day	CO2 lb/day	CH4 lb/day	CO2eq MT/year
<b>TOTAL</b>	<b>0.69</b>	<b>4.60</b>	<b>4.55</b>	<b>0.01</b>	<b>0.26</b>	<b>0.21</b>	<b>1392.77</b>	<b>0.05</b>	<b>1.27</b>
Significant Threshold	75	550	100	150	150	55	n/a	n/a	10,000
Exceed Significance?	NO	NO	NO	NO	NO	NO	n/a	n/a	NO

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## Construction Emissions

### Total Increase in Fuel Usage From Construction Equipment and Workers' Vehicles

Overall Construction Activity	Total Project Hours of Operation	Equipment Type	Off-Road Fuel (gal/hr)	Total Diesel Fuel Use (gallons)	Total Gasoline Fuel Use (gals)
Workers' Vehicles* - Commuting	N/A	Mixed Passenger	N/A	N/A	50.00
Offsite Delivery Trucks**	N/A	Heavy-Heavy Duty Delivery Truck	N/A	26.67	N/A
<b>TOTAL</b>				<b>26.67</b>	<b>50.00</b>

*\*Assume that construction workers' commute vehicles use gasoline and get 20 mi/gal and round trip length is 50 miles/phase.*

*\*\*Assume that delivery trucks use diesel and get 15 miles/gallon traveling 100 miles roundtrip; 2 locations*

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## APPENDIX C

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### OPERATIONAL EMISSION CALCULATIONS

# ATTACHMENT G

## Operational Emissions

### Application of Soil Stabilizers and Additional Sampling Trips at Affected Facilities

Application of Soil Stabilizers and Additional Sampling at Affected Cement Manufacturing Facilities

Construction Activity  
Application of Additional Soil Stabilizers

Operation Schedule - "Worst-case" Complete Soil Stabilizer Application at 2 facilities simultaneously

Activity	Equipment Type	No. of Equipment	Hrs/day	Crew Size
Off-Road Mobile Source Operations	Application / Spraying Truck-Other Construction Equip. Composite	2	8	2
On-Road Mobile Source Operations	Worker Vehicle	2	-	2
On-Road Mobile Source Operations	Worker Vehicle	2	-	2

- Spray soil stabilizer into place

- Spraying vehicle operator

- Sample Pick-up and Delivery to Lab

2015 Construction Equipment Emission Factors	VOC	CO	NOx	SOx	PM10	PM2.5	CO2	CH4
Equipment Type*	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr
Spraying Truck- Other Construction Equip. (composite)	0.0768	0.3645	0.6392	0.0013	0.0264	0.0264	123	0.0069

\*Equipment is assumed to be diesel fueled.

Source: CARB's Off-Road Mobile Source Emission Factors for Scenario Year 2015

<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/off-road-mobile-source-emission-factors>

Construction Vehicle (Mobile Source) Emission Factors for Years 2015	VOC	CO	NOx	SOx	PM10	PM2.5	CO2	CH4
Construction Related Activity	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile	lb/mile
Offsite (Construction Worker Vehicle- Spray Vehicle Operator)	0.00066355	0.00614108	0.00060188	0.00001070	0.00009259	0.00006015	1.10192837	0.00005923
Offsite (Worker Vehicle for Collecting Samples and Delivering to Lab)	0.00066355	0.00614108	0.00060188	0.00001070	0.00009259	0.00006015	1.10192837	0.00005923

Source: EMFAC 2007 (v2.3) Emission Factors (On-Road Vehicles, Scenario Year 2015)

[http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/emfac-2007-\(v2-3\)-emission-factors-\(on-road\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/emfac-2007-(v2-3)-emission-factors-(on-road))



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## Operational Emissions

### Construction Worker Number of Trips and Trip Length

Vehicle	No. of One-Way Trips/Day	Trip Length (miles)
Offsite (Construction Worker- Spray Vehicle Operator)	4	25
Offsite (Worker Vehicle for Collecting Samples and Delivering to Lab)	4	25

### Incremental Increase in Onsite Combustion Emissions from Construction Equipment

Equation: Emission Factor (lb/hr) x No. of Equipment x Work Day (hr/day) = Onsite Construction Emissions (lbs/day)

Equipment Type	VOC lb/day	CO lb/day	NOx lb/day	SOx lb/day	PM10 lb/day	PM2.5 lb/day	CO2 lb/day	CH4 lb/day
Spraying Truck- Other Construction Equip. (composite)	1.23	5.83	10.23	0.02	0.42	0.42	1961.57	0.11
<b>Construction Equip TOTAL</b>	<b>1.23</b>	<b>5.83</b>	<b>10.23</b>	<b>0.02</b>	<b>0.42</b>	<b>0.42</b>	<b>1961.57</b>	<b>0.11</b>

### Incremental Increase in Offsite Combustion Emissions from Construction Vehicles

Equation: Emission Factor (lb/mile) x No. of One-Way Trips/Day x Number of workers x Trip length (mile) = Offsite Construction Emissions (lbs/day)

Vehicle	VOC lb/day	CO lb/day	NOx lb/day	SOx lb/day	PM10 lb/day	PM2.5 lb/day	CO2 lb/day	CH4 lb/day
Offsite (Construction Worker- Spray Vehicle Operator)	0.07	0.61	0.06	0.00	0.01	0.01	110.19	0.01
Offsite (Worker Vehicle for Collecting Samples and Delivering to Lab)	0.07	0.61	0.06	0.00	0.01	0.01	110.19	0.01
<b>Vehicle TOTAL</b>	<b>0.13</b>	<b>1.23</b>	<b>0.12</b>	<b>0.00</b>	<b>0.02</b>	<b>0.01</b>	<b>220.39</b>	<b>0.01</b>

### Total Incremental Combustion Emissions from Operational Activities (Soil Stabilization Equipment and Workers' Vehicles)

	VOC lb/day	CO lb/day	NOx lb/day	SOx lb/day	PM10 lb/day	PM2.5 lb/day	CO2 lb/day	CH4 lb/day	CO2eq MT/year
<b>TOTAL</b>	<b>1.36</b>	<b>7.06</b>	<b>10.35</b>	<b>0.02</b>	<b>0.44</b>	<b>0.43</b>	<b>2181.95</b>	<b>0.12</b>	<b>1.99</b>
Significant Threshold	75	550	100	150	150	55	n/a	n/a	10,000
Exceed Significance?	NO	NO	NO	NO	NO	NO	n/a	n/a	NO

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## Operational Emissions

### Total Increase in Fuel Usage From Soil Stabilization Equipment and Workers' Vehicles

Overall Operational Activity	Total Project Hours of Operation	Equipment Type	Off-Road Fuel (gal/hr)*	Total Diesel Fuel Use (gallons)	Total Gasoline Fuel Use (gals)
Application of Additional Soil Stabilizer	16	Spraying Truck- Other Construction Equip. (composite)	2.47	79.04	N/A
Workers' Vehicles** - Spray Vehicle Operator	N/A	Mixed Passenger	N/A	N/A	10.00
Offsite (Worker Vehicle for Collecting Samples and Delivering to Lab)**	N/A	Heavy-Heavy Duty Delivery Truck	N/A	N/A	10.00
<b>TOTAL</b>				<b>79.04</b>	<b>20.00</b>

\*Based on CARB's Off-Road Model (Version 2.0).

\*\*Assume that construction workers' commute vehicles use gasoline and get 20 mi/gal and round trip length is 50 miles/phase.

\*\*\*Assume that sample collection/delivery vehicles use gasoline and get 20 miles/gallon traveling 50 miles roundtrip; 2 locations

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BOARD MEETING DATE: September 4, 2015

AGENDA NO. 40

PROPOSAL: Adopt Proposed Rule 415 – Odors from Rendering Facilities

*(Staff is recommending that the public hearing on this item be continued to the November 6, 2015 Board meeting.)*

BOARD MEETING DATE: September 4, 2015

AGENDA NO. 41

**PROPOSAL:** Proposed Amended Rule 1420.1 – Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities

**SYNOPSIS:** In March 2015, the Board adopted amendments to Rule 1420.1, lowering the ambient lead concentration limit and adding other housekeeping and maintenance measures. At the March Board Hearing, staff was directed to return to the Board with a rule proposal to lower the point source lead emission rate to 0.003 lb/hr and other options. Proposed Amended Rule 1420.1 will lower the point source emission rate, clarify that the rule applies during closure, and include new provisions to ensure lead and arsenic emissions are appropriately controlled during closure and clean-up activities.

**COMMITTEE:** Stationary Source, June 19, 2015, Reviewed

**RECOMMENDED ACTIONS:**

Adopt the attached resolution:

1. Certifying the Final Subsequent Environmental Assessment for Proposed Amended Rule 1420.1 – Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities; and
2. Amending Rule 1420.1 – Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities.

Barry R. Wallerstein, D.Env.  
Executive Officer

PF:JW:SN:MM

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**Background**

Rule 1420.1 – Emission Standards for Lead from Large Lead-acid Battery Recycling Facilities controls emissions of lead and other toxic air contaminants from large lead-acid battery recycling facilities. The rule applies to lead-acid battery recycling facilities that process more than 50,000 tons of lead annually, namely Exide Technologies located

in Vernon, and Quemetco Inc. located in the City of Industry. The rule includes ambient lead and arsenic concentration limits, facility mass point source limits, as well as housekeeping and maintenance provisions such as regular cleaning periods, inspections and proper handling of lead containing dust and waste. In March 2015 the Governing Board adopted amendments to the rule, lowering the ambient lead concentration limit to 0.100  $\mu\text{g}/\text{m}^3$  and lowering the point source lead emission rate to 0.023 lb/hr, effective January 1, 2016, as well as adding other housekeeping and maintenance measures. The Governing Board also directed staff to return to the Governing Board within six months with a rule proposal to further lower the point source lead emission rate to 0.003 lb/hr and other options. In April 2015, Exide notified the California Department of Toxic Substances Control (DTSC) that the facility was permanently closing.

### **Proposal**

Proposed Amended Rule (PAR) 1420.1 proposes to lower the lead point source emission limit from 0.045 pounds of lead per hour effective currently and 0.023 pounds of lead per hour effective January 1, 2016 to 0.003 pounds of lead per hour, effective on the date of adoption. The proposed lead emission rate has been achieved in practice, based on more than six years of source testing, at Quemetco.

The proposal also clarifies that Rule 1420.1 remains applicable to any large lead-acid battery recycling facility during closure, and includes new provisions to ensure lead and arsenic emissions are appropriately controlled during closure and clean-up activities. During the decontamination and demolition process, the facility will be required to continue ambient monitoring of lead and arsenic; comply with ambient standards for lead and arsenic; and submit a Compliance Plan for Closure Activities describing measures to ensure that ambient standards are met and contingency measures will be implemented in the event of an exceedance. Applicability of the proposed amended rule will cease when all District permits have been surrendered, the District verifies that DTSC has approved the facility's certification of final closure, and there have been no exceedances of ambient lead or arsenic limits for 12 consecutive months with at least one month occurring after the date of submittal of certification of final closure.

### **Public Process**

PAR 1420.1 was developed through a public process. A Public Workshop was held on June 30, 2015. The proposed rule was also presented to the Stationary Source Committee on June 19, 2015.

### **Key Outstanding Issue**

#### *Overlapping jurisdiction with DTSC*

The SCAQMD staff has received comments from both Quemetco and Exide voicing concerns that the proposed closure provisions may be pre-empted by state laws relating to hazardous waste management. The large lead-acid battery recycling facilities have also commented that the rule proposal could lead to indefinite stoppages of the closure

process. However, those hazardous waste laws specifically state they are not intended to limit the authority of other state or local agencies. Staff has consulted with DTSC staff and DTSC agrees there are no legal or logistical issues. SCAQMD has greater expertise in air monitoring issues and SCAQMD closure requirements will focus on air-related issues. SCAQMD and DTSC staffs have been working cooperatively with respect to closure requirements, and that cooperation is expected to continue.

### **California Environmental Quality Act**

Pursuant to the California Environmental Quality Act (CEQA) Guidelines §15162 and §15252 and SCAQMD Rule 110, the SCAQMD staff prepared a Draft Subsequent Environmental Assessment (SEA) for proposed amended Rule 1420.1. The Draft SEA included a project description and analysis of potential adverse environmental impacts that could be generated from the proposed project. The environmental analysis in the Draft SEA concluded that PAR 1420.1 would not generate any significant adverse impacts. Because the project will not result in significant adverse impacts, mitigation measures were not required and, thus, not made a condition of the approval of this project. Findings were not required pursuant to the provisions of CEQA Guidelines §15091 and, thus, not adopted for this project. The Draft SEA was released for a 30-day public review and comment period beginning on July 21, 2015 and ending on August 20, 2015.

Subsequent to the public release of the Draft SEA, minor additions and modifications were made to the SEA for clarification purposes. However, none of the additions or modifications alters any conclusions nor provides new information of significance relative to the Draft document. As a result, these minor revisions do not require recirculation of the document pursuant to CEQA Guidelines §15073.5. Therefore, the document is now a Final SEA and is included as an attachment to this Board package.

### **Socioeconomic Analysis**

The proposed amendments to Rule 1420.1 would affect two large lead-acid battery recycling facilities that process more than 50,000 tons of lead annually. The total compliance cost from the proposed amendments is estimated to be \$0.7 million annually, where 97 percent is attributed to ambient monitoring during facility closure. An annual compliance cost of this magnitude, when compared to the relative total value of the local economy (about \$1 Trillion), is expected to have no significant regional economic impacts. The socioeconomic assessment is part of the staff report.

### **AQMP and Legal Mandates**

Pursuant to Health & Safety Code Section 40460 (a), the SCAQMD is required to adopt an Air Quality Management Plan (AQMP) demonstrating compliance with all federal regulations and standards. The SCAQMD is required to adopt rules and regulations that carry out the objectives of the AQMP. PAR 1420.1 is not a control measure of the 2012

AQMP but is needed to reduce exposure and associated health risk impacts from lead, arsenic and other toxic emissions from large lead-acid battery recycling facilities. However, PAR 1420.1 will be submitted for inclusion into the State Implementation Plan as a contingency measure to become federally enforceable upon a determination by the U.S. Environmental Protection Agency that all or part of the District has failed to attain the National Ambient Air Quality Standard for Lead by the time required by the federal Clean Air Act.

**Implementation and Resource Impact**

Existing SCAQMD resources will be used to implement PAR 1420.1.

**Attachments**

- A. Summary of Proposal
- B. Key Issues and Responses
- C. Rule Development Process
- D. Key Contacts List
- E. Resolution
- F. Proposed Amended Rule 1420.1 Rule Language
- G. Proposed Amended Rule 1420.1 Staff Report
- H. Final Subsequent Environmental Analysis

**ATTACHMENT A**  
**SUMMARY OF PROPOSAL**

Proposed Amended Rule 1420.1 – Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities

Applicability

- Clarifies that Rule 1420.1 is applicable throughout closure activities.

Lead Point Source Emissions Controls

- Effective upon date of adoption, the total facility mass lead emission rate from all point sources will be reduced from 0.045 pounds of lead per hour effective currently and 0.023 pounds of lead per hour effective January 1, 2016 to 0.003 pounds of lead per hour effective upon date of adoption.
- Removed single lead point emission limit of 0.01 pounds of lead per hour since the overall emission rate is substantially lower.

Source Testing

- Requires annual source testing for point sources that emit lead. Removes biennial source testing option.

Curtailement Requirements

- Curtailement provisions revised to be consistent with proposed changes to the overall lead point source limit.

Facility Closure

- Clarifies that continuance of daily lead and arsenic ambient monitoring and compliance with ambient lead and arsenic ambient concentration limits is required through closure.
- Requires the submittal of a Compliance Plan for Closure Activities which will contain the following:
  - Description of measures that will be implemented to ensure lead and arsenic ambient concentration limits can be met during closure activities.
  - Contingency measures to be implemented in the event of an exceedance.
- If there is an exceedance of lead or arsenic ambient concentration limits, requires temporary suspension of closure activities that contributed to the exceedance until contingency measures can be implemented.

Exemption

- Provides relief from specified provisions of the rule once a facility has permanently ceased production and notified the Executive Officer in writing that the facility is permanently closing.



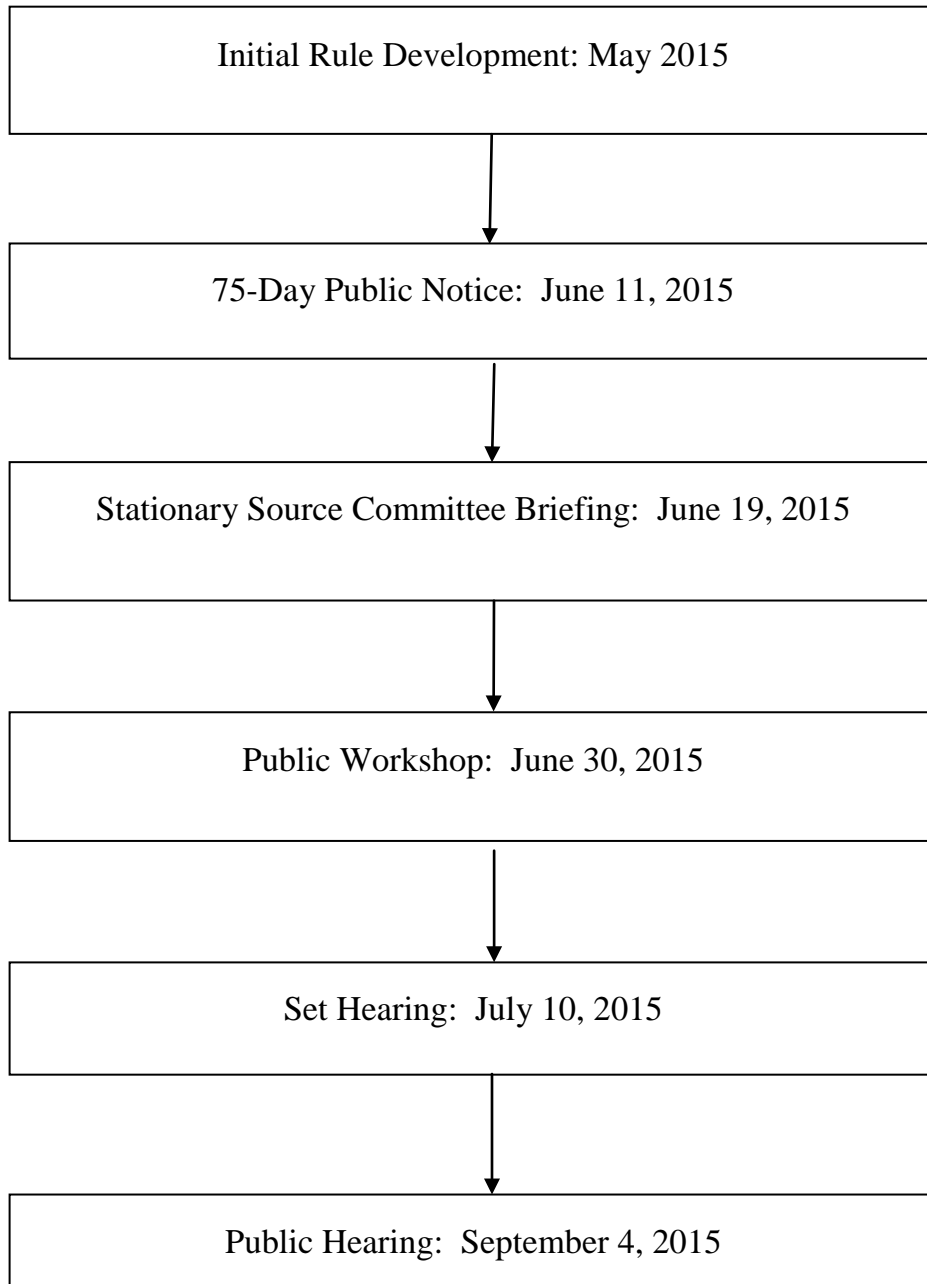
**ATTACHMENT B**  
**KEY ISSUES AND RESPONSES**

Proposed Amended Rule (PAR) 1420.1 – Emissions Standards for Lead and Other Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities

- Overlapping Jurisdiction with DTSC: The SCAQMD staff has received comments from both Quemetco and Exide that the proposed closure provisions may overlap or conflict with DTSC's jurisdiction. The large lead-acid battery recycling facilities have commented that the District's rule may be pre-empted by state laws relating to hazardous waste management and the rule proposal could lead to indefinite stoppages of the closure process in conflict with DTSC's closure requirements. These claims lack merit because:
  - SCAQMD retains its authority to regulate air emissions from stationary sources. The state's hazardous waste laws specifically state they are not intended to limit the authority of other state or local agencies.
  - SCAQMD staff has consulted with DTSC staff and there are no legal or logistical conflicts between DTSC requirements and PAR 1420.1. DTSC's regulatory authority is flexible such that its plans and schedule can be modified if needed.
  - SCAQMD and DTSC staffs have been working cooperatively in developing the air emission control requirements for Exide and that cooperative process is expected to continue throughout the entire closure process.
  - The proposed rule's Compliance Plan for Closure Activities is a mechanism to prevent exceedances that could occur while conducting closure activities. The Compliance Plan for Closure Activities will also include contingency measures that can be quickly implemented if there is an exceedance of lead or arsenic ambient concentration limits.

**ATTACHMENT C**  
**RULE DEVELOPMENT PROCESS**

**Proposed Amended Rule 1420.1 – Emission Standards for Lead and Other  
Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities**



**ATTACHMENT D**  
**KEY CONTACTS LIST**

Alta Environmental

Department of Toxic Substances Control

Duncan McKee (Quemetco Community Member)

East Yard Communities for Environmental Justice

E4 Strategic Solutions, Inc.

Exide Technologies

RSR Corporation

Sheppard & Mullin

Thomas Lohff (Quemetco Community Member)

## ATTACHMENT E

RESOLUTION NO. 15-\_\_\_\_\_

**A Resolution of the Governing Board of the South Coast Air Quality Management District (SCAQMD) certifying the Final Subsequent Environmental Assessment (SEA) for Proposed Amended Rule 1420.1 – Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-acid Battery Recycling Facilities.**

**A Resolution of the SCAQMD Governing Board Adopting Proposed Amended Rule (PAR) 1420.1 – Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-acid Battery Recycling Facilities.**

**WHEREAS**, the SCAQMD Governing Board finds and determines that the proposed amendments to PAR 1420.1 are considered a “project” pursuant to the California Environmental Quality Act (CEQA); and

**WHEREAS**, the Draft SEA determined the proposed project would result in no significant adverse environmental impacts; and

**WHEREAS**, the SCAQMD has had its regulatory program certified pursuant to Public Resources Code §21080.5 and has conducted CEQA review and analysis pursuant to such program (SCAQMD Rule 110); and

**WHEREAS**, the SCAQMD staff has prepared a Draft Subsequent Environmental Assessment (SEA) pursuant to its certified regulatory program and CEQA Guidelines §15162 and §15251, setting forth the potential environmental consequences of PAR 1420.1; and

**WHEREAS**, the Draft SEA was circulated for 30-day public review and comment period from July 22, 2015 to August 20, 2015; and

**WHEREAS**, no comment letters were received relative to the analysis presented in the Draft SEA and the Draft SEA has been revised such that it is now a Final SEA; and

**WHEREAS**, it is necessary that the adequacy of the Final SEA, including responses to comments, be determined by the SCAQMD Governing Board prior to its certification; and

**WHEREAS**, the Final SEA reflects the independent judgment of the SCAQMD; and

**WHEREAS**, a Mitigation Monitoring Plan pursuant to Public Resources Code §21081.6, has not been prepared since no mitigation measures are necessary; and

**WHEREAS**, the SCAQMD Governing Board finds and determines, taking into consideration the factors in section (d)(4)(D) of the Governing Board Procedures (codified as Section 30.5(4)(D) of the Administrative Code), that the modifications which have been made to PAR 1420.1 since notice of public hearing was published do not significantly change the meaning of the proposed project within the meaning of Health and Safety Code §40726 and would not constitute significant new information requiring recirculation of the Draft SEA pursuant to CEQA Guidelines §15073.5; and

**WHEREAS**, the SCAQMD Governing Board voting on PAR 1420.1 – Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-acid Battery Recycling Facilities, has reviewed and considered the Final SEA prior to its certification; and

**WHEREAS**, lead has been identified as a toxic air contaminant by the Office of Environmental Health Hazard Assessment (OEHHA); and

**WHEREAS**, the SCAQMD Governing Board directed staff to return to the SCAQMD Governing Board with a proposal to lower the overall point source lead emission limit to 0.003 pounds per hour and other options; and

**WHEREAS**, the SCAQMD staff conducted a public workshop regarding PAR 1420.1 on June 30, 2015; and

**WHEREAS**, California Health and Safety Code §40727 requires that prior to adopting, amending or repealing a rule or regulation, the SCAQMD Governing Board shall make findings of necessity, authority, clarity, consistency, non-duplication, and reference based on relevant information presented at the public hearing and in the staff report; and

**WHEREAS**, PAR 1420.1 is needed to further protect public health by reducing lead emissions from large lead-acid battery recycling facilities. The proposed amended rule establishes a lower lead point source emission limit, clarifies that the rule remains applicable during closure activities, and establishes additional closure requirements necessary to ensure that attainment with the lead NAAQS will be maintained and that surrounding communities suffer no

degradation in air quality during closure, including demolition, cleanup and decontamination activities; and

**WHEREAS**, the SCAQMD Governing Board obtains its authority to adopt, amend or repeal rules and regulations from sections 39002, 40000, 40001, 40440, 40441, 40702, 40725 through 40728, 41508, 41700, and 41706 of the Health and Safety Code; and

**WHEREAS**, the SCAQMD Governing Board has determined that PAR 1420.1 is written and displayed so that the meaning can be easily understood by persons directly affected by it; and

**WHEREAS**, the SCAQMD Governing Board has determined that PAR 1420.1 will be implementing, interpreting or making specific the provisions of the California Health and Safety Code Sections 40001 (rules to achieve and maintain ambient air quality standards), 41700 (nuisance), 41706(b) (emission standards for lead compounds from non-vehicular sources), Federal Clean Air Act Section 112 (Hazardous Air Pollutants), and CAA Section 116.

**WHEREAS**, the SCAQMD Governing Board has determined that PAR 1420.1 is in harmony with, and not in conflict with, or contradictory to, existing statutes, court decisions, or state or federal regulations; and

**WHEREAS**, the SCAQMD Governing Board has determined that PAR 1420.1 does not impose the same requirements as any existing state or federal regulations, and the proposed project is necessary and proper to execute the powers and duties granted to, and imposed upon, the SCAQMD; and

**WHEREAS**, Health and Safety Code §40727.2 requires the SCAQMD to prepare a written analysis of existing federal air pollution control requirements applicable to the same source type being regulated whenever it adopts, or amends a rule, and that the SCAQMD's comparative analysis of PAR 1420.1 is included in the staff report; and

**WHEREAS**, PAR 1420.1 is not a control measure in the 2012 Air Quality Management Plan (AQMP) or the 2012 Lead State Implementation Plan and thus, was not ranked by cost-effectiveness relative to other AQMP control measures in the 2012 AQMP, and furthermore, pursuant to Health and Safety Code §40910, cost-effectiveness in terms of dollars per ton of pollutant reduced is only applicable to rules regulating ozone, carbon monoxide, sulfur dioxide, and nitrogen dioxide and does not apply to toxic air contaminants; and

**WHEREAS**, the SCAQMD Governing Board has determined that the Socioeconomic Assessment of PAR 1420.1 is consistent with the March 17, 1989 and October 14, 1994 Governing Board Socioeconomic Resolutions for rule adoption; and

**WHEREAS**, the SCAQMD Governing Board has determined that PAR 1420.1 will result in increased costs to the large lead-acid battery recycling facilities, yet are considered to be reasonable, with a total annualized cost as specified in the Socioeconomic Assessment; and

**WHEREAS**, the SCAQMD Governing Board has actively considered the Socioeconomic Assessment and has made a good faith effort to minimize such impacts; and

**WHEREAS**, the SCAQMD Governing Board has determined that the Socioeconomic Assessment is consistent with the provisions of the California Health and Safety Code Sections 40440.8, 40728.5, and 40920.6; and

**WHEREAS**, the SCAQMD Governing Board specifies the Director of PAR 1420.1 as the custodian of the documents or other materials which constitute the record of proceedings upon which the adoption of this proposed project is based, which are located at the South Coast Air Quality Management District, 21865 Copley Drive, Diamond Bar, California; and

**WHEREAS**, a public hearing has been properly noticed in accordance with all provisions of Health and Safety Code §40725; and

**WHEREAS**, the SCAQMD Governing Board has held a public hearing in accordance with all provisions of law; and

**WHEREAS**, the proposed amendments to Rule 1420.1 will be submitted for inclusion into the State Implementation Plan as a contingency measure to become federally enforceable upon a determination by U.S. Environmental Protection Agency that all or part of the South Coast Air Basin has failed to attain the National Ambient Air Quality Standard for lead by the time required by the Clean Air Act; and

**WHEREAS**, the SCAQMD staff has coordinated with the California Department of Toxic Substances Control regarding the closure provisions of PAR 1420.1.

**NOW, THEREFORE BE IT RESOLVED**, that the SCAQMD Governing Board does hereby certify that the Final SEA for PAR 1420.1 –

Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-acid Battery Recycling Facilities, was completed in compliance with CEQA and Rule 110 provisions; and that the Final SEA was presented to the SCAQMD Governing Board, whose members reviewed, considered and approved the information therein prior to acting on PAR 1420.1; and

**BE IT FURTHER RESOLVED**, that because no significant adverse environmental impacts were identified as a result of implementing PAR 1420.1 – Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-acid Battery Recycling Facilities, a Statement of Findings, a Statement of Overriding Considerations, and a Mitigation Monitoring Plan are not required; and

**BE IT FURTHER RESOLVED**, that the SCAQMD Governing Board does hereby adopt, pursuant to the authority granted by law, PAR 1420.1 – Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-acid Battery Recycling Facilities as set forth in the attached and incorporated herein by reference.

DATE: \_\_\_\_\_

\_\_\_\_\_  
CLERK OF THE BOARDS



## ATTACHMENT F

(Adopted November 5, 2010)(Amended January 10, 2014)  
(Amended March 7, 2014)(Amended March 6, 2015)  
PAR 1420.1t August 2015

### **PROPOSED** **AMENDED** **RULE 1420.1.**

### **EMISSION STANDARDS FOR LEAD AND OTHER TOXIC AIR CONTAMINANTS FROM LARGE LEAD- ACID BATTERY RECYCLING FACILITIES**

#### (a) Purpose

- (1) The purpose of this rule is to protect public health by reducing exposure and emissions of lead from large lead-acid battery recycling facilities, and to help ensure attainment and maintenance of the National Ambient Air Quality Standard for Lead. The purpose of this rule is to also protect public health by reducing arsenic, benzene, and 1,3-butadiene exposure and emissions from these facilities.

#### (b) Applicability

- (1) This rule applies to all persons who own or operate a lead-acid battery recycling facility that has processed more than 50,000 tons of lead a year in any one of the five calendar years prior to November 5, 2010, or annually thereafter, hereinafter a large lead-acid battery recycling facility. Applicability shall be based on facility lead processing records required under subdivision (m) of this rule, and Rule 1420 – Emissions Standards for Lead. Compliance with this rule shall be in addition to other applicable rules such as Rules 1407 and 1420. This rule shall cease to apply once all District permits have been surrendered to the District and the facility closure requirements in paragraph (p)(4) have been satisfied.

#### (c) Definitions

For the purposes of this rule, the following definitions shall apply:

- (1) **AGGLOMERATING FURNACE** means a furnace used to melt flue dust that is collected from an emission control device, such as a baghouse, into a solid mass.
- (2) **AMBIENT AIR** for purposes of this rule means outdoor air.
- (3) **ARSENIC** means the oxides and other compounds of the element arsenic included in particulate matter, vapors, and aerosols.

- (4) BATTERY BREAKING AREA means the plant location at which lead-acid batteries are broken, crushed, or disassembled and separated into components.
- (5) BENZENE means an organic compound with chemical formula  $C_6H_6$  and Chemical Abstract Service number 71-43-2.
- (6) 1,3-BUTADIENE means an organic compound with chemical formula  $C_4H_6$  and Chemical Abstract Service number 106-99-0.
- (7) DRYER means a chamber that is heated and that is used to remove moisture from lead-bearing materials before they are charged to a smelting furnace.
- (8) DRYER TRANSITION PIECE means the junction between a dryer and the charge hopper or conveyor, or the junction between the dryer and the smelting furnace feed chute or hopper located at the ends of the dryer.
- (9) DUCT SECTION means a length of duct including angles and bends which is contiguous between two or more process devices (e.g., between a furnace and heat exchanger; baghouse and scrubber; scrubber and stack; etc.).
- (10) EMISSION COLLECTION SYSTEM means any equipment installed for the purpose of directing, taking in, confining, and conveying an air contaminant, and which at minimum conforms to design and operation specifications given in the most current edition of *Industrial Ventilation, Guidelines and Recommended Practices*, published by the American Conference of Government and Industrial Hygienists, at the time a complete permit application is filed with the District.
- (11) EMISSION CONTROL DEVICE means any equipment installed in the ventilation system of a point source or emission collection system for the purposes of collecting and reducing emissions of arsenic, benzene, lead, 1,3-butadiene, or any other toxic air contaminant.
- (12) FUGITIVE LEAD-DUST means any solid particulate matter containing lead that is in contact with ambient air and has the potential to become airborne.
- (13) FURNACE AND REFINING/CASTING AREA means any area of a large lead-acid battery recycling facility in which:
  - (a) Smelting furnaces or agglomerating furnaces are located; or
  - (b) Refining operations occur; or
  - (c) Casting operations occur.
- (14) LEAD-ACID BATTERY RECYCLING FACILITY means any facility, operation, or process in which lead-acid batteries are disassembled and recycled into elemental lead or lead alloys through smelting.

- (15) LEAD means elemental lead, alloys containing elemental lead, or lead compounds, calculated as elemental lead.
- (16) LEEWARD WALL means the furthest exterior wall of a total enclosure that is opposite the windward wall.
- (17) MAINTENANCE ACTIVITY means any of the following activities conducted outside of a total enclosure that generates or has the potential to generate fugitive lead-dust:
  - (a) building construction, renovation, or demolition;
  - (b) replacement or repair of refractory, filter bags, or any internal or external part of equipment used to process, handle, or control lead-containing materials;
  - (c) replacement of any duct section used to convey lead-containing exhaust;
  - (d) metal cutting or welding that penetrates the metal structure of any equipment, and its associated components, used to process lead-containing material, such that lead dust within the internal structure or its components can become fugitive lead-dust;
  - (e) resurfacing, grading, repair, or removal of ground, pavement, concrete, or asphalt; or
  - (f) soil disturbances, including but not limited to, soil sampling, soil remediation, or activities where soil is moved, removed, and/or stored.
- (18) MATERIALS STORAGE AND HANDLING AREA means any area of a large lead-acid battery recycling facility in which lead-containing materials including, but not limited to, broken battery components, reverberatory furnace slag, flue dust, and dross, are stored or handled between process steps. Areas may include, but are not limited to, locations in which materials are stored in piles, bins, or tubs, and areas in which material is prepared for charging to a smelting furnace.
- (19) MEASURABLE PRECIPITATION means any on-site measured rain amount greater than 0.01 inches in any complete 24-hour calendar day (i.e., midnight to midnight).
- (20) PARTIAL ENCLOSURE for purposes of this rule means a structure comprised of walls or partitions on at least three sides or three-quarters of the perimeter that surrounds areas where maintenance activity is conducted, in order to prevent the generation of fugitive lead-dust.

- (21) POINT SOURCE means any process, equipment, or total enclosure used in a large lead-acid battery recycling facility, including, but not limited to, agglomerating furnaces, dryers, smelting furnaces and refining kettles, whose emissions pass through a stack or vent designed to direct or control the exhaust flow prior to release into the ambient air.
- (22) PROCESS means using lead or lead-containing materials in any operation including, but not limited to, the charging of lead-containing materials to smelting furnaces, lead refining and casting operations, and lead-acid battery breaking.
- (23) RENOVATION for purposes of this rule means the altering of a building or permanent structure, or the removal of one or more of its components that generates fugitive lead-dust.
- (24) SENSITIVE RECEPTOR means, for the purposes of this rule, any residence including private homes, condominiums, apartments, and living quarters; education resources such as preschools and kindergarten through grade twelve (k-12) schools; daycare centers; and health care facilities such as hospitals or retirement and nursing homes. A sensitive receptor includes long term care hospitals, hospices, prisons, and dormitories or similar live-in housing.
- (25) SLAG means the inorganic material by-product discharged, in molten state, from a lead smelting furnace that has a lower specific gravity than lead metal and contains lead compounds. This shall include, but is not limited to, lead sulfate, lead sulfide, lead oxides, and lead carbonate consisting of other constituents charged to a smelting furnace which are fused together during the pyrometallurgical process.
- (26) SMELTING means the chemical reduction of lead compounds to elemental lead or lead alloys through processing in high temperatures greater than 980° C.
- (27) SMELTING FURNACE means any furnace where smelting takes place including, but not limited to, blast furnaces, reverberatory furnaces, rotary furnaces, and electric furnaces.
- (28) STATIC DIFFERENTIAL FURNACE PRESSURE means the difference between the absolute internal pressure of the smelting furnace ( $P_f$ , in inches water column) and the absolute atmospheric pressure in the immediate vicinity outside the smelting furnace ( $P_a$ , in inches water column) and is calculated as follows:  $P_f - P_a$ .

- (29) TOTAL ENCLOSURE means a permanent containment building/structure, completely enclosed with a floor, walls, and a roof to prevent exposure to the elements, (e.g., precipitation, wind, run-off), with limited openings to allow access and egress for people and vehicles, that is free of cracks, gaps, corrosion, or other deterioration that could cause or result in fugitive lead-dust.
- (30) TOXIC AIR CONTAMINANT is an air pollutant which may cause or contribute to an increase in mortality or serious illness, or which may pose a present or potential hazard to human health.
- (31) WINDWARD WALL means the exterior wall of a total enclosure which is most impacted by the wind in its most prevailing direction determined by a wind rose using data required under paragraph (j)(5) of this rule, or other data approved by the Executive Officer.

(d) General Requirements

(1) Ambient Air Concentration of Lead

The owner or operator of a large lead-acid battery recycling facility shall not discharge emissions into the atmosphere which contribute to ambient air concentrations of lead that exceed the following:

Effective Date	Ambient Air Concentration of Lead, micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ), averaged over 30 consecutive days
Prior to January 1, 2016	0.150 $\mu\text{g}/\text{m}^3$
January 1, 2016 to December 31, 2016	0.110 $\mu\text{g}/\text{m}^3$
On and after January 1, 2017	0.100 $\mu\text{g}/\text{m}^3$

An exceedance of the ambient air concentrations of lead specified in the above table shall occur if it is measured by any monitor installed pursuant to subdivision (j) or at any District-installed monitor.

- (2) The owner or operator of a large lead-acid battery recycling facility shall maintain and operate total enclosures pursuant to subdivision (e) and lead point source emission control devices pursuant to paragraphs (f)(1) and (f)(6) through (f)(8).

- (3) The owner or operator of a large lead-acid battery recycling facility shall submit a Compliance Plan if emissions are discharged into the atmosphere which contribute to ambient air concentrations of lead or arsenic that exceed the ambient concentrations in paragraph (g)(1).
- (4) The owner or operator of a large lead-acid battery recycling facility shall:
  - (A) Within 30 days of January 10, 2014, submit a Compliance Plan Schedule to the Executive Officer for review and approval to ensure that the facility will comply with the January 1, 2015 total facility mass emissions limits for arsenic, benzene, and 1,3-butadiene point sources specified in paragraph (f)(2). The Compliance Plan Schedule shall be subject to plan fees specified in Rule 306 and include:
    - (i) a list of all control measures to be implemented that includes a description of the control technology, the equipment that will be affected, the affected pollutants, the anticipated reductions, and the dates the measures will be implemented; and
    - (ii) a schedule that identifies dates for completion of engineering design(s), equipment procurement, construction, demolition (if any), equipment installation, and testing for each control measure described pursuant to clause (d)(4)(A)(i).
  - (B) Submit complete permit applications for all equipment specified in the Compliance Plan Schedule that requires a District permit within 90 days of January 10, 2014.
  - (C) Complete all construction within 180 days of receiving Permit to Construct approvals from the Executive Officer.
  - (D) The owner or operator of a large lead-acid battery recycling facility shall not be subject to requirements of subparagraphs (d)(4)(A) through (d)(4)(C) if the most recent District-approved source tests, conducted no earlier than January 1, 2011, show that the facility is meeting all of the emission limits specified in paragraph (f)(2).
- (5) **Ambient Air Concentration of Arsenic**

The owner or operator of a large lead-acid battery recycling facility shall not discharge emissions into the atmosphere which contribute to an ambient air concentration of arsenic that exceeds 10.0 nanograms per cubic meter (ng/m<sup>3</sup>) averaged over a 24-hour time period as determined by monitors

pursuant to subdivision (j) or by any District-installed monitor. An exceedance of 10.0 ng/m<sup>3</sup> averaged over a 24-hour period shall be based on the average of the analysis of two sample results on the same filter. A second analysis is required if the first sample exceeds 10.0 ng/m<sup>3</sup>.

- (6) If the ambient air concentration of arsenic is determined to exceed 10.0 ng/m<sup>3</sup> averaged over a 24-hour time period as calculated pursuant to paragraph (d)(5), then the owner or operator shall notify the Executive Officer in writing within 72 hours of when the facility knew or should have known it exceeded the ambient air arsenic concentration of 10.0 ng/m<sup>3</sup> averaged over a 24-hour time period.
- (7) The owner or operator of a large lead-acid battery recycling facility shall fund and participate in a multi-metal continuous emissions monitoring system (CEMS) demonstration program to continuously monitor lead, arsenic, and other metals emitted from a stack within its facility for a period specified by the District. Participation and funding of the multi-metals CEMS demonstration program shall require the owner or operator to:
  - (A) Submit payment to the District for District personnel or its contractor to assemble, install, maintain, train, test, analyze, and decommission a multi-metals CEMS demonstration program not to exceed the following amounts and schedule:
    - (i) \$63,500 by April 1, 2014; and an additional
    - (ii) \$143,225 by September 1, 2014
  - (B) Provide continuous facility access to District personnel and its contractors to deliver, assemble, install, monitor, maintain, test, analyze, and decommission a multi-metals CEMS;
  - (C) Provide the necessary location and infrastructure for the multi-metals CEMS including:
    - (i) siting location with sufficient spacing, clearance, and structural support;
    - (ii) electric power circuits;
    - (iii) compressed air;
    - (iv) sampling port(s);
    - (v) access to wireless modem connection for data retrieval;
    - (vi) any necessary moving or lifting equipment and personnel to operate such equipment in order to install the system; and
    - (vii) day to day instrument and equipment operation.

(e) Total Enclosures

(1) Enclosure Areas

The owner or operator of a large lead-acid battery recycling facility shall enclose within a total enclosure the following areas in groups or individually:

- (A) Battery breaking areas;
- (B) Materials storage and handling areas, excluding areas where unbroken lead-acid batteries and finished lead products are stored;
- (C) Dryer and dryer areas including dryer transition pieces, charging hoppers, chutes, and skip hoists conveying any lead-containing material;
- (D) Smelting furnaces and smelting furnace areas charging any lead-containing material;
- (E) Agglomerating furnaces and agglomerating furnace areas charging any lead-containing material; and
- (F) Refining and casting areas.

(2) Total Enclosure Emissions Control

The owner or operator of a large lead-acid battery recycling facility shall vent each total enclosure to an emission collection system that ducts the entire gas stream which may contain lead to a lead emission control device and the entire gas stream which may contain arsenic to an arsenic emission control device, respectively, pursuant to subdivision (f).

(3) Total Enclosure Ventilation

Ventilation of the total enclosure at any opening including, but not limited to, vents, windows, passages, doorways, bay doors, and roll-ups shall continuously be maintained at a negative pressure of at least 0.02 mm of Hg (0.011 inches H<sub>2</sub>O) measured pursuant to paragraph (e)(4).

(4) Digital Differential Pressure Monitoring Systems

The owner or operator of a large lead-acid battery recycling facility shall install, operate, and maintain a digital differential pressure monitoring system for each total enclosure as follows:

- (A) A minimum of one building digital differential pressure monitoring system shall be installed and maintained at each of the following three walls in each total enclosure having a total ground surface area of 10,000 square feet or more:



- (i) The leeward wall;
  - (ii) The windward wall; and
  - (iii) An exterior wall that connects the leeward and windward wall at a location defined by the intersection of a perpendicular line between a point on the connecting wall and a point on its furthest opposite exterior wall, and intersecting within plus or minus ten ( $\pm 10$ ) meters of the midpoint of a straight line between the two other monitors specified in clauses (e)(4)(A)(i) and (e)(4)(A)(ii). The midpoint monitor shall not be located on the same wall as either of the other two monitors described in clauses (e)(4)(A)(i) or (e)(4)(A)(ii).
- (B) A minimum of one building digital differential pressure monitoring system shall be installed and maintained at the leeward wall of each total enclosure that has a total ground surface area of less than 10,000 square feet.
- (C) Digital differential pressure monitoring systems shall be certified by the manufacturer to be capable of measuring and displaying negative pressure in the range of 0.01 to 0.2 mm Hg (0.005 to 0.11 inches H<sub>2</sub>O) with a minimum increment of measurement of plus or minus 0.001 mm Hg (0.0005 inches H<sub>2</sub>O).
- (D) Digital differential pressure monitoring systems shall be equipped with a continuous strip chart recorder or electronic recorder approved by the Executive Officer. If an electronic recorder is used, the recorder shall be capable of writing data on a medium that is secure and tamper-proof. The recorded data shall be readily accessible upon request by the Executive Officer. If software is required to access the recorded data that is not readily available to the Executive Officer, a copy of the software, and all subsequent revisions, shall be provided to the Executive Officer at no cost. If a device is required to retrieve and provide a copy of such recorded data, the device shall be maintained and operated at the facility.
- (E) Digital differential pressure monitoring systems shall be calibrated in accordance with manufacturer's specifications at least once every 12 calendar months or more frequently if recommended by the manufacturer.

(F) Digital differential pressure monitoring systems shall be equipped with a backup, uninterruptible power supply to ensure continuous operation of the monitoring system during a power outage.

(5) In-draft Velocity

The in-draft velocity of the total enclosure shall be maintained at  $\geq 300$  feet per minute at any opening including, but not limited to, vents, windows, passages, doorways, bay doors, and roll-ups. In-draft velocities for each total enclosure shall be determined by placing an anemometer, or an equivalent device approved by the Executive Officer, at the center of the plane of any opening of the total enclosure.

(f) Point Source Emissions Controls

The owner or operator of a large lead-acid battery recycling facility shall vent emissions from each lead, arsenic, benzene, and 1,3-butadiene point source to a lead, arsenic, benzene, and 1,3-butadiene emission control device, respectively, that meets the requirements of this subdivision and is approved in writing by the Executive Officer.

(1) Lead Point Source Emission Controls

The owner or operator of a large lead-acid battery recycling facility shall:

(A) On and after (date of adoption), meet a total facility mass lead emissions limit from all lead point sources that does not exceed 0.003 pound of lead per hour. Prior to January 1, 2016, meet a total facility mass lead emissions from all lead point sources not to exceed 0.045 pounds of lead per hour. On and after January 1, 2016, meet a total facility mass lead emissions from all lead point sources not to exceed 0.023 pounds of lead per hour. The maximum emission rate for any single lead point source shall not exceed 0.010 pounds of lead per hour. The total facility mass lead emission rate and maximum emission rates for any single lead point source shall be determined using the most recently approved source tests conducted on behalf of the facility or the District; and

(B) Install a secondary lead emission control device that controls lead emissions from the exhaust of the primary lead emission control device used for a dryer. The secondary lead emission control device shall be fitted with dry filter media, and the secondary lead control device shall only be used to vent the primary lead emission control

device used for the dryer. An alternative secondary lead control method that is equally or more effective for the control of lead emissions may be used if a complete application is submitted as part of the permit application required under paragraph (d)(2) and approved by the Executive Officer.

(2) Arsenic, Benzene and 1,3-Butadiene Point Source Emission Controls

The mass emissions from all arsenic, benzene, and 1,3-butadiene point sources at a large lead-acid battery recycling facility shall meet the following hourly emissions thresholds for the dates specified:

- (A) No later than 60 days after January 10, 2014, the total facility emission rate for a large lead-acid battery recycling facility from all point sources shall not exceed 0.00285 pound of arsenic per hour.
- (B) No later than January 1, 2015, the total facility emission rate for a large lead-acid battery recycling facility from all point sources shall not exceed 0.00114 pound of arsenic per hour.
- (C) No later than January 1, 2015, the total emission rate for a large lead-acid battery recycling facility from all point sources excluding point sources from emission control devices on total enclosures shall not exceed the following:
  - (i) 0.0514 pound of benzene per hour; and
  - (ii) 0.00342 pound of 1,3-butadiene per hour.
- (D) The point source mass emission rates shall be determined based on the average of triplicate samples, using the most recent District-approved source tests conducted by the facility or the District, pursuant to subdivision (k).
- (E) For purposes of this rule, only point sources that have a source test result of greater than 1 part per billion shall be included in determining the total facility mass emission rates for benzene and 1,3-butadiene.

(3) Monitoring Device

The owner or operator of a large lead-acid battery recycling facility shall, for each smelting furnace, install, calibrate, operate and maintain a monitoring device that has been approved by the Executive Officer pursuant to paragraph (f)(4). The monitoring device shall measure and record the static differential furnace pressure in inches water column. Each smelting furnace shall be operated such that static differential furnace pressure, in inches of

water column averaged over 30 minutes, is maintained at a value -0.02 or more negative. A reverberatory furnace may be operated at an alternative static differential furnace pressure if the owner or operator can demonstrate that it can achieve emission reductions that are equivalent to or better than those achieved when operating at a pressure of -0.02 or more negative. Demonstration shall be based on source test protocols and source tests conducted pursuant to the requirements of subdivision (k) and approved by the Executive Officer. The alternative static differential furnace pressure shall not exceed 0.4 inches water column and must be approved by the Executive Officer in the Continuous Furnace Pressure Monitoring Plan of paragraph (f)(4). For the purposes of this requirement, the owner or operator shall ensure that the monitoring device:

- (A) Continuously measures the instantaneous static differential furnace pressure;
  - (B) Has a resolution of at least 0.01 inches water column;
  - (C) Has an increment of measurement of 0.01 inches water column;
  - (D) Has a range from -10 inches to +10 inches water column for the measuring device;
  - (E) Is equipped with ports to allow for periodic calibration in accordance with manufacturer's specifications;
  - (F) Is calibrated according to manufacturer's specifications at a frequency of not less than twice every calendar year;
  - (G) Is equipped with a continuous data acquisition system (DAS). The DAS shall record the data output from the monitoring device at a frequency of not less than once every sixty (60) seconds;
  - (H) Generates a data file from the computer system interfaced with each DAS each calendar day. The data file shall be saved in electronic ASCII character format, Microsoft Excel (xls orxlsx) format, PDF format, or other format as approved by the Executive Officer. The file shall contain a table of chronological date and time and the corresponding data output value from the monitoring device in inches of water column. The operator shall prepare a separate data file each day showing the 30-minute average pressure readings recorded by this device each calendar day; and
  - (I) Is maintained in accordance with manufacturer's specifications.
- (4) No later than 30 days after January 10, 2014, the owner or operator of a

large lead-acid battery recycling facility shall submit to the Executive Officer for approval an application for a Continuous Furnace Pressure Monitoring (CFPM) Plan for the monitoring device required in paragraph (f)(3). The CFPM Plan shall contain the information identified in Appendix 3 of this rule and is subject to the fees specified in Rule 306.

- (5) The Executive Officer shall notify the owner or operator in writing whether the CFPM Plan is approved or disapproved. Determination of approval status shall be based on, at a minimum, submittal of information that satisfies the criteria set forth in paragraph (f)(4). If the CFPM Plan is disapproved, the owner or operator shall resubmit the CFPM Plan, subject to plan fees specified in Rule 306, within 30 calendar days after notification of disapproval of the CFPM Plan. The resubmitted CFPM Plan shall include any information necessary to address deficiencies identified in the disapproval letter. It is a violation of the rule for a facility not to have an approved CFPM Plan after the second denial. If the resubmitted CFPM Plan is denied, the operator or owner may appeal the denial by the Executive Officer to the Hearing Board pursuant to Rule 216 – Appeals and Rule 221 - Plans.
- (6) For any emission control device that uses filter media other than a filter bag(s), including, but not limited to, HEPA and cartridge-type filters, the filter(s) used shall be rated by the manufacturer to achieve a minimum of 99.97% capture efficiency for 0.3 micron particles.
- (7) For any emission control device that uses a filter bag(s), the filter bag(s) used shall be polytetrafluoroethylene membrane-type, or any other material that is equally or more effective for the control of lead emissions, and approved for use by the Executive Officer.
- (8) Each emission collection system and emission control device subject to this subdivision shall, at minimum, be inspected, maintained, and operated in accordance with the manufacturer's specifications.
- (9) The owner or operator of a large lead-acid battery recycling facility shall comply with the curtailment requirements in subdivision (o) if the total facility mass lead emissions from all lead point sources exceeds the limits specified in subparagraph (f)(1)(A), and/or the total facility emission rate from all arsenic point sources exceeds the limits specified in subparagraph (f)(2)(A) or (f)(2)(B).

(g) Compliance Plan

- (1) The owner or operator of a large lead-acid battery recycling facility shall submit a Compliance Plan if emissions are discharged into the atmosphere which contribute to ambient air concentrations of lead or arsenic that exceed the following:

Air Contaminant	Effective Date	Ambient Air Concentration
Lead	Prior to January 1, 2016	0.120 $\mu\text{g}/\text{m}^3$ , averaged over 30 consecutive days
	January 1, 2016 to December 31, 2106	0.110 $\mu\text{g}/\text{m}^3$ , averaged over 30 consecutive days
	On and after January 1, 2017	0.100 $\mu\text{g}/\text{m}^3$ , averaged over 30 consecutive days
Arsenic	On and after February 1, 2014	8 $\text{ng}/\text{m}^3$ , averaged over a 24 hour time period as determined under paragraph (g)(8)

The ambient air concentrations of lead and arsenic shall be determined by monitors pursuant to subdivision (j) or at any District-installed monitor.

- (2) The owner or operator of a large lead-acid battery recycling facility shall notify the Executive Officer in writing within 72 hours of when the facility knew or should have known it exceeded an ambient air concentration of lead or arsenic specified in paragraph (g)(1). Notification shall only be required the first time the ambient air concentration of lead or arsenic exceeds the concentration limits in paragraph (g)(1) for each monitor.
- (3) The owner or operator of a large lead-acid battery recycling facility shall submit, within 30 calendar days of exceeding an ambient air concentration of lead or arsenic pursuant to paragraph (g)(1), a complete Compliance Plan to the Executive Officer for review and approval, subject to plan fees as specified in Rule 306. The Compliance Plan shall, at a minimum, include the following:
- (A) A description of additional lead and/or arsenic emission reduction measures to achieve the ambient air concentration of lead as specified in paragraph (d)(1), or the ambient air concentration of

arsenic of 10.0 ng/m<sup>3</sup> averaged over a 24-hour time period, as required under paragraph (d)(5), including, but not limited to, requirements for the following:

- (i) Housekeeping, inspection, and maintenance activities;
  - (ii) Additional total enclosures;
  - (iii) Modifications to lead and arsenic emission control devices;
  - (iv) Installation of multi-stage lead and arsenic emission control devices;
  - (v) Process changes including reduced throughput limits;
  - (vi) Conditional curtailments including, at a minimum, information specifying the curtailed processes, process amounts, and length of curtailment; and
  - (vii) Identification of lead and/or arsenic reduction measures to be implemented relative to increasing ranges of exceedance levels of the ambient air concentration limits.
- (B) The locations within the facility and method(s) of implementation for each lead and/or arsenic reduction measure of subparagraph (g)(3)(A); and
- (C) An implementation schedule for each lead and/or arsenic emission reduction measure of subparagraph (g)(3)(A) to be implemented if lead and/or arsenic emissions discharged from the facility contribute to ambient air concentrations of lead that exceed the requirements in paragraph (d)(1), or ambient air concentrations of arsenic that exceed 10.0 ng/m<sup>3</sup> averaged over a 24-hour time period, measured at any monitor pursuant to subdivision (j) or at any District-installed monitor. The schedule shall also include a list of the lead and/or arsenic reduction measures of subparagraph (g)(2)(A) that can be implemented immediately, prior to plan approval.
- (4) The Executive Officer shall notify the owner or operator in writing whether the Compliance Plan is approved or disapproved. Determination of approval status shall be based on, at a minimum, submittal of information that satisfies the criteria set forth in paragraph (g)(2), and whether the plan is likely to lead to avoiding future exceedances of the ambient air concentration levels set forth in paragraph (g)(1). If the Compliance Plan is disapproved, the owner or operator shall resubmit the Compliance Plan, subject to plan fees specified in Rule 306, within 30 calendar days after

notification of disapproval of the Compliance Plan. The resubmitted Compliance Plan shall include any information necessary to address deficiencies identified in the disapproval letter. It is a violation of the rule for a facility not to have an approved Compliance Plan after the second denial. If the resubmitted Compliance Plan is denied, the operator or owner may appeal the denial by the Executive Officer to the Hearing Board under Rule 216 – Appeals and Rule 221 - Plans.

- (5) The owner or operator shall implement measures based on the schedule in the approved Compliance Plan if lead emissions discharged from the facility contribute to ambient air concentrations of lead to exceed the requirements in paragraph (d)(1) or an ambient air concentration of arsenic of  $10.0 \text{ ng/m}^3$  averaged over a 24-hour time period as determined in paragraph (d)(5), measured at any monitor pursuant to subdivision (j) or at any District-installed monitor.
- (6) The owner or operator may make a request to the Executive Officer to modify or update an approved Compliance Plan.
- (7) The owner or operator shall update the Compliance Plan 12 months from January 10, 2014 and annually thereafter, in order to update measures that have been implemented and to identify any new measures that can be implemented.
- (8) An exceedance of an ambient air concentration of arsenic of  $8.0 \text{ ng/m}^3$  averaged over a 24-hour period shall be based on the average of the analysis of two sample results on the same filter. A second analysis is required if the first sample exceeds  $8.0 \text{ ng/m}^3$ .

(h) Housekeeping Requirements

The owner or operator of a large lead-acid battery recycling facility shall control fugitive lead-dust by conducting all of the following housekeeping practices:

- (1) Clean by wet wash or a vacuum equipped with a filter(s) rated by the manufacturer to achieve a 99.97% capture efficiency for 0.3 micron particles in a manner that does not generate fugitive lead-dust, the following areas at the specified frequencies, unless located within a total enclosure vented to a lead emission control device. Days of measurable precipitation in the following areas occurring within the specified timeframe of a required cleaning frequency may be counted as a cleaning:

(A) Monthly cleanings of roof tops on structures  $\leq 45$  feet in height that



- house areas associated with the storage, handling or processing of lead-containing materials; and
- (B) Quarterly cleanings, no more than 3 calendar months apart, of roof tops on structures > 45 feet in height that house areas associated with the storage, handling or processing of lead-containing materials; and
  - (C) Weekly cleanings of all areas where lead-containing wastes generated from housekeeping activities are stored, disposed of, recovered or recycled.
  - (D) Initiate immediate cleaning, no later than one hour, after any maintenance activity or event including, but not limited to, accidents, process upsets, or equipment malfunction, that causes deposition of fugitive lead-dust onto areas specified in subparagraph (h)(1)(A) through (h)(1)(C). If the facility can demonstrate that delays were due to safety or timing issues associated with obtaining equipment required to implement this requirement, immediate cleanings of roof tops shall be completed within 72 hours.
- (2) Inspect all total enclosures and facility structures that house, contain or control any lead point source or fugitive lead-dust emissions at least once a month. Any gaps, breaks, separations, leak points or other possible routes for emissions of lead or fugitive lead-dust to ambient air shall be permanently repaired within 72 hours of discovery. The Executive Officer may approve a request for an extension beyond the 72-hour limit if the request is submitted before the limit is exceeded.
  - (3) Upon receipt, immediately send any lead-acid battery that is cracked or leaking to the battery breaking area for processing or storage pursuant to paragraph (h)(6).
  - (4) Pave, concrete, asphalt, or otherwise encapsulate all facility grounds as approved by the Executive Officer. Facility grounds used for plant life that are less than a total surface area of 100 square feet shall not be subject to encapsulation. Facility grounds requiring removal of existing pavement, concrete, asphalt or other forms of encapsulation necessary for maintenance purposes shall not require encapsulation while undergoing work, and shall be re-encapsulated immediately after all required work is completed. All work shall be conducted in accordance with subdivision (i).
  - (5) Remove any weather cap installed on any stack that is a source of lead emissions.

- (6) Store all materials capable of generating any amount of fugitive lead-dust including, but not limited to, slag and any other lead-containing waste generated from the housekeeping requirements of subdivision (h) and maintenance activities of subdivision (i), in sealed, leak-proof containers, unless located within a total enclosure.
- (7) Transport all materials capable of generating any amount of fugitive lead-dust including, but not limited to, slag and any other waste generated from housekeeping requirements of subdivision (h), within closed conveyor systems or in sealed, leak-proof containers, unless located within a total enclosure.
- (8) Initiate removal of any lead-containing material, including sludge, from the entire surface area of any surface impoundment pond or reservoir holding storm water runoff or spent water from housekeeping activities within 1 hour after the water level is  $\leq$  1 inch above the bottom of the pond or reservoir. Removal of lead-containing material is required to be completed as soon as possible, and no later than six calendar days after the time initiation of the removal was required. Thereafter, surfaces shall be washed down weekly in a manner that does not generate fugitive lead-dust until the pond or reservoir is used again for holding water.
- (9) **Maintain and Use an Onsite Mobile Vacuum Sweeper or Vacuum**  
The owner or operator of a large lead-acid battery recycling facility shall maintain an onsite mobile vacuum sweeper that is in compliance with District Rule 1186, or a vacuum equipped with a filter(s) rated by the manufacturer to achieve a 99.97% capture efficiency for 0.3 micron particles to conduct the following sweeping activities:
  - (A) Vacuum sweep all paved, concreted or asphalted facility areas subject to vehicular or foot traffic three times per day and occurring at least once per operating shift with each event not less than four hours apart, unless located within a total enclosure vented to a lead control device.
  - (B) Immediately vacuum sweep any area specified in subparagraph (h)(9)(A), no later than one hour after any maintenance activity or event including accidents, process upsets, or equipment malfunction that results in the deposition of fugitive lead-dust.
  - (C) Vacuum sweeping activities specified in paragraph (h)(9) shall not be required during days of measurable precipitation.

- (10) Except when inside a total enclosure, all lead or arsenic containing trash and debris shall be placed in covered containers that remain covered at all times except when trash or debris is actively transferred. Trash and debris containers shall be free of liquid or dust leaks.
  - (11) Post signs at all entrances and truck loading and unloading areas indicating a plant-wide speed limit of 5 miles per hour.
- (i) Maintenance Activity
- (1) The owner or operator of a large lead-acid battery recycling facility shall conduct any maintenance activity in a negative air containment enclosure, vented to a permitted negative air machine equipped with a filter(s) rated by the manufacturer to achieve a 99.97% capture efficiency for 0.3 micron particles, that encloses all affected areas where fugitive lead-dust generation potential exists, unless located within a total enclosure or approved by the Executive Officer. Any maintenance activity that cannot be conducted in a negative air containment enclosure due to physical constraints, limited accessibility, or safety issues when constructing or operating the enclosure shall be conducted:
    - (A) In a partial enclosure, barring conditions posing physical constraints, limited accessibility, or safety issues;
    - (B) Using wet suppression or a vacuum equipped with a filter(s) rated by the manufacturer to achieve a 99.97% capture efficiency for 0.3 micron particles, at locations where the potential to generate fugitive lead-dust exists prior to conducting and upon completion of the maintenance activity. Wet suppression or vacuuming shall also be conducted during the maintenance activity barring safety issues;
    - (C) While collecting 24-hour samples at monitors for every day that maintenance activity is occurring notwithstanding paragraph (j)(2);
    - (D) Shall be stopped immediately when instantaneous wind speeds are  $\geq$  20 mph. Maintenance work may be continued if it is necessary to prevent the release of lead emissions;
    - (E) All concrete or asphalt cutting or drilling performed outside of a total enclosure shall be performed under 100% wet conditions; and
    - (F) Grading of soil shall only be performed on soils sufficiently wet to prevent fugitive dust.
  - (2) Store or clean by wet wash or a vacuum equipped with a filter(s) rated by

the manufacturer to achieve a 99.97% capture efficiency for 0.3 micron particles, all lead-contaminated equipment and materials used for any maintenance activity immediately after completion of work in a manner that does not generate fugitive lead-dust.

(j) Ambient Air Monitoring and Sampling Requirements

The owner or operator of a large lead-acid battery recycling facility shall conduct ambient air monitoring and sampling as follows:

- (1) Collect samples from a minimum of four sampling sites. Locations for sampling sites shall be approved by the Executive Officer.
  - (A) Locations for sampling sites shall be based on maximum expected ground level lead and/or arsenic concentrations, at or beyond the property line, as determined by Executive Officer-approved air dispersion modeling calculations and emission estimates from all lead and arsenic point sources and fugitive lead-dust and arsenic-dust sources, and other factors including, but not limited to, population exposure and seasonal meteorology.
  - (B) The Executive Officer may require one or more of the four sampling sites to be at locations that are not based on maximum ground level lead and/or arsenic concentrations, and that are instead at locations at or beyond the property line that are representative of upwind or background concentrations.
  - (C) Sampling sites at the property line may be located just inside the fence line on facility property if logistical constraints preclude placement outside the fence line at the point of maximum expected ground level lead and/or arsenic concentrations.
- (2) Collect ambient lead and arsenic samples as follows:
  - (A) Lead samples shall be collected daily as 24-hour, midnight-to-midnight, samples at all sites.
  - (B) Arsenic samples shall be collected daily as 24-hour, midnight-to-midnight, samples collected at all sites.
  - (C) If a 24-hour, midnight-to-midnight sample was not collected due to a monitor malfunction or other occurrence beyond the control of the facility, the owner or operator shall:
    - (i) Report with a notification made to 1-800-CUT-SMOG within 2 hours of knowing that the 24-hour, midnight-to-midnight

sample was not collected providing the facility name, name of the monitor, the date of the occurrence, and the reason that the 24-hour midnight-to-midnight sample was not collected; and

- (ii) The operator shall not miss a 24-hour, midnight-to-midnight sample for more than one day over a consecutive 30 day period.
- (3) Submit samples collected pursuant to paragraphs (j)(1) and (j)(2) to a laboratory approved under the SCAQMD Laboratory Approval Program for analysis within three calendar days of collection and calculate ambient lead and arsenic concentrations for individual 24-hour samples within 15 calendar days of the end of the calendar month in which the samples were collected. Duplicate samples shall be made available and submitted to the District upon request by the Executive Officer.
- (4) Sample collection for lead and/or arsenic shall be conducted using Title 40, CFR 50 Appendix B - *Reference Method for the Determination of Suspended Particulate Matter in the Atmosphere (High Volume Method)*, or U.S. EPA-approved equivalent methods, and sample analysis for lead shall be conducted using Title 40, CFR 50 Appendix G - *Reference Method for the Determination of Lead in Suspended Particulate Matter Collected from Ambient Air*, or U.S. EPA-approved equivalent methods. Sample analysis for arsenic shall be conducted using U.S. EPA Compendium Method IO-3.5 - *Determination of Metals in Ambient Particulate Matter Using Inductively Coupled Plasma/Mass Spectrometry (ICP/MS)*; *EPA Compendium Method IO-3.5; In IO Compendium of Methods for the Determination of Inorganic Compounds in Ambient Air*. Alternatively, sample analysis for arsenic may be conducted using the District's *Standard Operating Procedure for The Determination of Metals in Ambient Particulate Matter by Inductively Coupled Plasma Mass Spectrometry (ICP-MS)*.
- (5) Continuously record wind speed and direction data at all times using equipment approved by the Executive Officer at a minimum of one location and placement approved by the Executive Officer.
- (6) Ambient air quality monitoring shall be conducted by persons approved by the Executive Officer and sampling equipment shall be operated and maintained in accordance with U.S. EPA-referenced methods.
- (7) All ambient air quality monitoring systems required by this subdivision shall

be equipped with a backup, uninterruptible power supply to ensure continuous operation of the monitoring system during a power outage.

- (8) Cleaning activities including, but not limited to, wet washing and misting, that result in damage or biases to samples collected shall not be conducted within 10 meters of any sampling site required under this subdivision.
  - (9) If the owner or operator of a large lead-acid battery recycling facility exceeds an ambient air lead concentration pursuant to paragraph (d)(1), the owner or operator shall comply with the curtailment provisions of subdivision (o).
  - (10) If a large lead-acid battery recycling facility exceeds an ambient air concentration of arsenic of 10.0 ng/m<sup>3</sup> pursuant to paragraph (d)(5), the owner or operator shall comply with the curtailment requirements of subdivision (o).
  - (11) The owner or operator of a large lead-acid battery recycling facility shall retain lead and arsenic samples collected pursuant to this subdivision for one year. The samples shall be stored in an individually sealed container and labeled with the applicable monitor and date. Upon request, the samples shall be provided to the Executive Officer within one business day.
- (k) Source Tests
- (1) The owner or operator of a large lead-acid battery recycling facility shall conduct a source test of all lead point sources at least annually to demonstrate compliance with the mass emissions standards specified in subdivision (f). ~~If the results of the most recent source test for a lead point source demonstrating compliance with the lead emission standard of subdivision (f) are below an emission rate of 0.0012 pounds of lead per hour, the next test for that lead point source shall be performed no later than 24 months after the date of the most recent test.~~
  - (2) The owner or operator of a large lead-acid battery recycling facility shall conduct a source test for all arsenic point sources, and all benzene and 1,3-butadiene point sources, excluding emission control devices on total enclosures, at least annually to demonstrate compliance with the mass emissions standards specified in subdivision (f). If the results of the most recent source test demonstrating compliance with the arsenic, benzene, and 1,3-butadiene mass emissions standards of subdivision (f) are below the emission rates specified in subparagraphs (k)(2)(A) through (k)(2)(C), the

next source test for those point sources shall be performed no later than 24 months after the date of the most recent source test.

- (A) 0.000860 pound of arsenic per hour;
  - (B) 0.0386 pound of benzene per hour; and
  - (C) 0.00257 pound of 1,3-butadiene per hour.
- (3) The owner or operator of a large lead-acid battery recycling facility with a new or modified lead control device with initial start-up on or after November 5, 2010 shall conduct the initial source test for it within 60 calendar days after initial start-up.
- (4) Prior to conducting a source test pursuant to paragraph (k)(1), (k)(2), (k)(3), or (k)(13), the owner or operator of a large lead-acid battery recycling facility shall submit a pre-test protocol to the Executive Officer for approval at least 60 calendar days prior to conducting the source test. The pre-test protocol shall include the source test criteria of the end user and all assumptions, required data, and calculated targets for testing the following:
- (A) Target arsenic, benzene, lead, or 1,3-butadiene mass emission standard;
  - (B) Preliminary target pollutant analytical data;
  - (C) Planned sampling parameters; and
  - (D) Information on equipment, logistics, personnel, and other resources necessary for an efficient and coordinated test.
- (5) The owner or operator of a large lead-acid battery recycling facility shall notify the Executive Officer in writing one week prior to conducting any source test required by paragraph (k)(1), (k)(2), (k)(3), or (k)(13).
- (6) The owner or operator of a large lead-acid battery recycling facility shall notify the Executive Officer within three business days, including Mondays, of when the facility knew or should have known of any source test result that exceeds any of the emission standards specified in subdivision (f). Notifications shall be made to 1-800-CUT-SMOG and followed up in writing with the results of the source tests within seven (7) days of notification.
- (7) Source tests shall be conducted while operating at a minimum of 80% of equipment permitted capacity and in accordance with any of the following applicable test methods:
- (A) SCAQMD Method 12.1 - *Determination of Inorganic Lead Emissions from Stationary Sources Using a Wet Impingement Train*

- (B) ARB Method 12 – *Determination of Inorganic Lead Emissions from Stationary Sources*
- (C) EPA Method 12 – *Determination of Inorganic Lead Emissions from Stationary Sources*
- (D) ARB Method 436 – *Determination of Multiple Metal Emissions from Stationary Sources*
- (E) EPA Method TO-15 – *Determination of Volatile Organic Compounds (VOCs) in Air Collected in Specially-Prepared Canisters and Analyzed By Gas Chromatography/Mass Spectrometry (GC/MS)*
- (F) CARB Method 410A – *Determination of Benzene from Stationary Sources (Low Concentration Gas Chromatographic Technique)*
- (G) CARB Method 422.102 – *Determination of Volatile Organic Compounds (VOCs) in Emissions from Stationary Sources*
- (8) The average of triplicate samples, obtained according to approved test methods specified in paragraph (k)(7), shall be used to determine compliance or to report source test results required under paragraph (k)(13).
- (9) The operator may use alternative or equivalent source test methods as defined in U.S. EPA 40 CFR 60.2, approved in writing by the Executive Officer, in addition to the Air Resources Board or the U.S. EPA, as applicable.
- (10) The operator shall use a test laboratory approved under the SCAQMD Laboratory Approval Program for the source test methods cited in this subdivision. If there is no approved laboratory, then approval of the testing procedures used by the laboratory shall be granted by the Executive Officer on a case-by-case basis based on SCAQMD protocols and procedures.
- (11) When more than one source test method or set of source test methods are specified for any testing, the application of these source test methods to a specific set of test conditions is subject to approval by the Executive Officer. In addition, a violation established by any one of the specified source test methods or set of source test methods shall constitute a violation of the rule.
- (12) An existing source test conducted on and after January 1, 2009 for lead emission control devices existing before November 5, 2010 may be used as the initial source test specified in paragraph (k)(1) to demonstrate compliance with the control standard of subdivision (f) upon Executive Officer approval. The source test shall meet, at a minimum, the following



criteria:

- (A) The test is the most recent conducted since January 1, 2009;
- (B) The test demonstrated compliance with the control standard of subdivision (f);
- (C) The test is representative of the method to control emissions currently in use; and
- (D) The test was conducted using applicable and approved test methods specified in paragraphs (k)(7), (k)(9), or (k)(10).

(13) Beginning January 10, 2014, the owner or operator of a large lead-acid battery recycling facility shall conduct two source tests for benzene and 1,3-butadiene emissions from all emission control devices on total enclosures as follows:

- (A) First source test conducted no later than March 1, 2014.
- (B) Second source test conducted no later than September 1, 2014.
- (C) Source tests on all emission control devices on total enclosures must be completed within a time period of 72 hours or less.

(14) Testing conducted by the facility, by the District, or by a contractor acting on behalf of the District or the facility to determine compliance with this rule shall be performed according to the most recent District-approved test protocol for the same purpose or compounds.

(15) Reports from source testing conducted pursuant to subdivision (k) shall be submitted to the District in 90 days or less after completion of testing.

(l) **New Facilities**

The owner or operator of a large lead-acid battery recycling facility beginning construction or operations on and after November 5, 2010 shall:

- (1) Demonstrate to the satisfaction of the Executive Officer that the facility is not located in an area that is zoned for residential or mixed use;
- (2) Demonstrate to the satisfaction of the Executive Officer that the facility is not located within 1,000 feet from the property line of a sensitive receptor, a school under construction, park, or any area that is zoned for residential or mixed use. The distance shall be measured from the property line of the new facility to the property line of the sensitive receptor; and
- (3) Submit complete permit applications for all equipment required by this rule prior to beginning construction or operations, and otherwise on or before the time required by District rules.

(m) Recordkeeping

- (1) The owner or operator of a large lead-acid battery recycling facility shall keep records of the following:
  - (A) Daily records indicating amounts of lead-containing material processed, including, but not limited to, purchase records, usage records, results of analysis, or other District-approved verification to indicate processing amounts;
  - (B) Results of all ambient air lead and arsenic monitoring, meteorological monitoring, and other data specified by subdivision (j);
  - (C) Records of housekeeping activities completed as required by subdivision (h), maintenance activities of subdivision (i), and emission control device inspection and maintenance requirements of paragraph (f)(8), including the name of the person performing the activity, and the dates and times on which specific activities were completed; and
  - (D) Records of unplanned shutdowns of any smelting furnace including the date and time of the shutdown, description of the corrective measures taken, and the re-start date and time.
- (2) The owner or operator of a large lead-acid battery recycling facility shall maintain all records for five years, and keep records onsite for at least two years.

(n) Reporting

- (1) Ambient Air Monitoring Reports
  - (A) The owner or operator of a large lead-acid battery recycling facility shall report by the 15<sup>th</sup> of each month to the Executive Officer, the results of all ambient air lead and wind monitoring for each preceding month, or more frequently if determined necessary by the Executive Officer. The report shall include the results of individual 24-hour samples and 30-day rolling averages for each day within the reporting period.
  - (B) The owner or operator of a large lead-acid battery recycling facility shall report by the 15<sup>th</sup> of each month to the Executive Officer, the results of all ambient air arsenic and wind monitoring for each

preceding month, or more frequently if determined necessary by the Executive Officer and the owner or operator is notified in writing of the required frequency.

- (C) Any exceedances of ambient air concentrations specified in paragraphs (d)(1) and (d)(5) shall be reported with a notification made to the 1-800-CUT-SMOG within 24 hours of receipt of the completed sample analysis required in paragraph (j)(3), followed by a written report to the Executive Officer no later than three calendar days after the notification. The written report shall include the causes of the exceedance and the specific corrective actions implemented.
- (D) On and after July 1, 2015, the owner or operator of a large lead-acid battery recycling facility shall report the following information in writing to the Executive Officer within 72 hours of when the facility knew or should have known that the ambient air concentration of lead was greater than  $0.300 \mu\text{g}/\text{m}^3$  for any 24-hour sample:
  - (i) Date of the occurrence;
  - (ii) Name of the monitor;
  - (iii) Ambient lead concentration at the monitor for the 24 hour sample;
  - (iv) Potential cause or causes of the occurrence; and
  - (v) Potential remedies to prevent the reoccurrence.

(2) Shutdown, Turnaround, and Maintenance Activity Notification

The owner or operator of a large lead-acid battery recycling facility shall:

- (A) Notify the Executive Officer and the public within one hour after an unplanned shutdown of any emission control device has occurred, regardless of whether any emissions were associated with or caused by the unplanned shutdown. If the unplanned shutdown involves a breakdown pursuant to Rule 430, the breakdown notification report required by Rule 430 shall serve in lieu of this notification to the Executive Officer. The notification shall include the following information:
  - (i) Date and time the unplanned shutdown of the emission control device(s) occurred;
  - (ii) Description of the shutdown emission control device and the processes and/or equipment vented by the emission control

device;

- (iii) Description of when the processes and/or equipment vented by the emission control device were shutdown, including expected shutdown time;
  - (iv) Reason why the emission control device was shutdown;
  - (v) Total duration of the unplanned shutdown, if known; and
  - (vi) Facility contact name and phone number for further information regarding the unplanned shutdown.
- (B) If an unplanned shutdown of any emission control device occurs, and the reason for the unplanned shutdown cannot be determined within the one-hour reporting period under subparagraph (n)(2)(A), the owner or operator shall investigate the reason for the unplanned shutdown and notify the Executive Officer of the reason for the unplanned shutdown within 5 business days of the event. If the reason for the unplanned shutdown is still not known within 5 business days of the event, the owner or operator shall notify the Executive Officer within 5 business days of the event and:
- (i) Use an independent third party approved by the Executive Officer to conduct an investigation at the facility to determine the reason for the unplanned shutdown of any emission control device subject to this rule. The investigation shall include but is not limited to:
    - (I) Physically inspecting the control equipment and surrounding portions of the facility which may provide information to understand the reason for the unplanned shutdown of emission control equipment; and
    - (II) Reviewing equipment maintenance and operation records, logs, and other documentation which may provide information to understand the reason for the unplanned shutdown of emission control equipment;
  - (ii) Use an independent third party approved by the Executive Officer to inspect all equipment repaired or replaced in response to the unplanned shutdown of emission control equipment, to ensure affected control equipment can operate properly; and

- (iii) Within 30 calendar days of the reported unplanned shutdown, provide a written report to the Executive Officer and the Director of the California Department of Toxic Substances Control. The owner or operator shall notify the Executive Officer if an approved independent third party is not available for use, or the list of approved independent third parties has not yet been developed by the Executive Officer, and shall submit the written report 30 days from when an approved third party is available. The written report shall include the following information:
    - (I) Date of the unplanned shutdown of emission control equipment;
    - (II) Reason for the unplanned shutdown of emission control equipment;
    - (III) List of all equipment repaired or replaced in response to the unplanned shutdown and corrective actions taken to prevent recurrence of the unplanned shutdown of emission control equipment; and
    - (IV) Written verification that the affected emission control equipment is operational. If the affected equipment is not operational, provide an approximate date the subject equipment is expected to be operational.
  - (iv) The owner or operator shall be responsible for reimbursement to the District for any and all expenses incurred by the independent third-party investigator in the investigation, inspection, and generation of a written report to determine the cause of an unplanned shutdown of any emission control equipment subject to this rule, as required by subparagraph (n)(2)(B). The owner or operator shall reimburse the District within 30 days of notification from the Executive Officer that payment is due.
  - (v) The reimbursement specified in clause (n)(2)(B)(iv) shall not exceed \$12,000 per third-party investigation.
- (C) Notify the Executive Officer and the public at least ten calendar days prior to a planned turnaround or shutdown of any smelting furnace, battery breaker, or emission control device subject to this rule that

results in arsenic, benzene, 1,3-butadiene, or lead emissions. The notification shall specify the subject equipment and the start and end date of the turnaround or shutdown period.

- (D) Notify the Executive Officer at least ten calendar days prior to the beginning of maintenance activity, as defined in paragraph (c)(17), that is conducted routinely on a monthly or less frequent basis. The notification and report required under subparagraph (n)(2)(F) shall include, at a minimum, the following:
  - (i) Dates, times, and locations of activities to be conducted;
  - (ii) Description of activities;
  - (iii) Name of person(s)/company conducting the activities;
  - (iv) Lead abatement procedures, including those specified in subdivision (i), to be used to minimize fugitive lead-dust emissions; and
  - (v) Date of expected re-start of equipment.
- (E) Notify the public at least ten calendar days prior to the beginning of building construction, renovation, or demolition, and resurfacing, repair, or removal of ground pavement, concrete or asphalt if such activities are conducted outside of a total enclosure and generate fugitive lead-dust. The notification shall include, at a minimum, the following:
  - (i) Dates, times, and locations of activities to be conducted;
  - (ii) Description of activities; and
  - (iii) Date of expected re-start of equipment.
- (F) Provide the notification to the Executive Officer required under subparagraphs (n)(2)(A), (n)(2)(C), and (n)(2)(D) to 1-800-CUT-SMOG followed by a written notification report to the Executive Officer no later than three business days, including Mondays, after the unplanned shutdown occurred.
- (G) Provide notification to the public required under subparagraphs (n)(2)(A), (n)(2)(C), and (n)(2)(E) through a facility contact or pre-recorded notification center that is accessible 24 hours a day, 7 days a week, and through electronic mail using a list of recipients provided by the Executive Officer. Another method of notification to the public may be used provided it is approved by the Executive Officer.

- (H) Install a sign indicating the phone number for the facility contact or pre-recorded notification center that meets the following requirements, unless otherwise approved in writing by the Executive Officer:
  - (i) Installed within 50 feet of the main entrance of the facility and in a location that is visible to the public;
  - (ii) Measures at least 48 inches wide by 48 inches tall;
  - (iii) Displays lettering at least 4 inches tall with text contrasting with the sign background; and
  - (iv) Located between 6 and 8 feet above grade from the bottom of the sign.
  
- (I) Install a sign indicating the phone number for the facility contact or pre-recorded notification center that meets the following requirements, unless otherwise approved in writing by the Executive Officer:
  - (i) Installed at all entrances and at intervals of 330 feet or less along the property line of the site or along the perimeter of the facility;
  - (ii) Measures at least 30 inches wide by 30 inches tall;
  - (iii) Displays lettering at least 2 inches tall with text contrasting with the sign background; and
  - (iv) Located between 6 and 8 feet above grade from the bottom of the sign; and
  - (v) In addition to the phone number, the sign shall also display, in English and Spanish, the following information:
    - Caution
    - Lead-Acid Battery Recycling Facility
    - Call before digging
  
- (J) Notify the Executive Officer at least ten calendar days prior to a planned breach or within one hour after an unplanned breach to a total enclosure such that it no longer meets the definition of a total enclosure pursuant to paragraph (c)(29). The notification shall include the following information:
  - (i) Date and time of planned or unplanned breach to the total enclosure;
  - (ii) Explanation of breach to the total enclosure;

- (iii) Total duration or if not known, estimated duration of breach to the total enclosure; and
    - (iv) Facility contact name and phone number for further information.
  - (3) Initial Facility Status Report
    - (A) Initial Facility Status Report Due Date

The owner or operator of a large lead-acid battery recycling facility existing before November 5, 2010 shall submit an initial facility status report to the Executive Officer no later than January 1, 2011. Large lead-acid battery recycling facilities beginning construction or initial operations after November 5, 2010 shall submit the initial compliance status report upon start-up.
    - (B) The initial facility status report shall contain the information identified in Appendix 1.
  - (4) Ongoing Facility Status Report

The owner or operator of a large lead-acid battery recycling facility shall submit a summary report to the Executive Officer to document the ongoing facility status.

    - (A) Frequency of Ongoing Facility Status Reports

The report shall be submitted annually on or before February 1 for all sources and shall include information covering the preceding calendar year.
    - (B) The content of ongoing facility status reports shall contain the information identified in Appendix 2.
  - (5) Adjustments to the Timeline for Submittal and Format of Reports

The Executive Officer may adjust the timeline for submittal of periodic reports, allow consolidation of multiple reports into a single report, establish a common schedule for submittal of reports, or accept reports prepared to comply with other state or local requirements. Adjustments shall provide the same information and shall not alter the overall frequency of reporting.
- (o) Curtailment Requirements
  - (1) The owner or operator of a large lead-acid battery recycling facility shall implement the following mandatory daily process curtailments if emissions are discharged into the atmosphere which contribute to monitored ambient air concentrations of lead, as determined pursuant to paragraph (d)(1), and/or



ambient air concentrations of arsenic, as determined pursuant to paragraph (d)(5), that exceed the thresholds listed below in Table 1:

**Table 1 – Process Curtailments Based on Ambient Air Concentrations of Lead and/or Arsenic**

Air Contaminant	Monitored Ambient Air Concentration	Reduction in Feedstock Charged to Reverberatory Furnace
Lead	Prior to January 1, 2016: >0.150 – 0.230 $\mu\text{g}/\text{m}^3$ January 1, 2016 to December 31, 2016: >0.110 – 0.230 $\mu\text{g}/\text{m}^3$ On and after January 1, 2017: >0.100 – 0.230 $\mu\text{g}/\text{m}^3$	15%
	>0.230 – 0.300 $\mu\text{g}/\text{m}^3$	25%
	>0.300 – 0.375 $\mu\text{g}/\text{m}^3$	50%
	>0.375 $\mu\text{g}/\text{m}^3$	75%
Arsenic	>10.0 – 15.0 $\text{ng}/\text{m}^3$	15%
	>15.0 – 20.0 $\text{ng}/\text{m}^3$	25%
	>20.0 – 25.0 $\text{ng}/\text{m}^3$	50%
	>25.0 $\text{ng}/\text{m}^3$	75%

- (A) The process curtailments for exceedances of the ambient air concentration of lead thresholds in Table 1 shall remain in effect until the monitoring results at each affected monitoring station are at or below the ambient lead concentration limits specified in paragraph (d)(1) for a period of 30 consecutive days, or the monitoring results at each affected monitoring station are at or below 0.100  $\mu\text{g}/\text{m}^3$  for at least 10 consecutive days and no other monitor exceeds the thresholds specified in subdivision (d); and
  - (B) The process curtailments for exceedances of the ambient air concentration of arsenic thresholds in Table 1 shall remain in effect until the monitoring results at each affected monitoring station are at or below 10.0  $\text{ng}/\text{m}^3$  of arsenic averaged over a 24-hour time period, for a period of at least 30 consecutive days.
- (2) The owner or operator of a large lead-acid battery recycling facility shall implement the following mandatory daily process curtailments if the total facility mass emissions from all lead and/or arsenic point sources exceed the

thresholds listed below in Table 2:

**Table 2 – Process Curtailments Based on Total Facility Mass Lead and/or Arsenic Emissions From All Point Sources**

Effective Date	Air Contaminant	Total Facility Mass Emission Rate (lbs/hour)	Reduction in Feedstock Charged to Reverberatory Furnace	
On and after January 10, 2014 (date of adoption)	Lead	Prior to January 1, 2016 >0.045 – 0.0675	15%	
		On and after January 1, 2016 >0.0230.003 – 0.0675		
		>0.0675 – 0.09		25%
		>0.09 – 0.1125		50%
No later than 60 days after January 10, 2014 to December 31, 2014	Arsenic	>0.1125	75%	
		>0.00285 – 0.00428	15%	
		>0.00428 – 0.00570	25%	
		>0.00570 – 0.00713	50%	
On and after January 1, 2015	Arsenic	>0.00713	75%	
		>0.00114 – 0.00171	15%	
		>0.00171 – 0.00228	25%	
		>0.00228 – 0.00285	50%	
		>0.00285	75%	

- (A) The process curtailments in Table 2 shall remain in effect until the facility demonstrates compliance using the most recent District-approved source tests conducted by the facility or the District, pursuant to subdivision (k).
- (3) Reductions in feedstock charged to the reverberatory furnace required by paragraphs (o)(1) or (o)(2) shall be based on the daily average of materials charged to the reverberatory furnace over the previous 90 days of operation prior to when the facility knew or should have known of the exceedance.
- (4) The process curtailments in Table 1 and Table 2 shall begin within 48 hours of the time when the owner or operator receives sampling results indicating

an exceedance of any lead and/or arsenic threshold listed in Table 1 or Table 2.

- (5) The owner or operator of a large lead-acid battery recycling facility may temporarily exceed the mandatory process curtailments specified in Table 1 of paragraph (o)(1) and Table 2 of paragraph (o)(2), only for the period of time required to perform source tests to demonstrate compliance with this rule.

(p) Large Lead-Acid Battery Recycling Facility Closure Requirements

The owner or operator of a large lead-acid battery recycling facility that has notified the Executive Officer that the facility will be permanently closing shall do the following:

- (1) Continue daily arsenic and lead ambient monitoring in accordance with subdivision (j) and comply with the requirements in paragraphs (d)(1), (d)(5) and (d)(6);
- (2) Within 90 days from (date of adoption) or ~~notification~~, the date a large lead-acid battery recycling facility notified the Executive Officer that the facility will be permanently closing, whichever is later, submit a Compliance Plan for Closure Activities to the Executive Officer for review and approval, and upon approval shall implement the approved Compliance Plan. A Compliance Plan for Closure Activities is subject to plan fees as specified in Rule 306. The Compliance Plan for Closure Activities shall, at a minimum, include the following:
  - (A) A description of measures to ensure the ambient air concentration of lead and arsenic as specified in paragraphs (d)(1) and (d)(5) will not be exceeded;
  - (B) Additional contingency measures that can be implemented in the event there is an exceedance of the lead or arsenic ambient concentrations specified in paragraphs (d)(1) and (d)(5); and
  - (C) A schedule for implementing measures that coincide with the various California Department of Toxic Substances Control closure phases including inventory removal, decontamination, confirmation soil sampling, removal of equipment, building decontamination, ~~confirmation sampling for the building~~, soil and soil gas sampling, and building demolition. Measures in the Compliance Plan for Closure Activities shall be updated periodically to reflect the

progression of closure activities.

- (3) If the ambient air concentrations of lead or arsenic exceed the limits in paragraphs (d)(1) and (d)(5), the owner or operator shall temporarily suspend closure-related activities that contributed to the exceedance until contingency measures in the Approved Compliance Plan for Closure Activities ~~can be~~ are implemented. If a previously unidentified activity which the contingency measures do not address contributes to the exceedances, then a revised Compliance Plan for Closure Activities will be required to be submitted and approved by the Executive Officer, in consultation with the California Department of Toxic Substances Control, before closure related activities that contributed to the exceedances resume;
- (4) The applicability and all provisions of this rule will no longer apply when the Executive Officer determines the following criteria have been met:
- (A) All SCAQMD permits have been surrendered to the Executive Officer;
  - (B) The lead-acid battery recycling facility has submitted certification of final closure, approved by the California Department of Toxic Substances Control, to the Executive Officer;
  - (C) The owner or operator of the large lead-acid battery recycling facility has received written confirmation from the Executive Officer that the final closure has been verified; and
  - (D) The facility has had no exceedances of ambient lead or arsenic concentrations pursuant to paragraph (d)(1) and (d)(5) for 12 consecutive months with at least one month occurring after the date of submittal of certification of final closure.

(q) Exemption

The owner or operator of a large lead-acid battery recycling facility that has permanently ceased production and has notified the Executive Officer that the facility will be permanently closing is exempt from all requirements in the rule except for paragraphs (d)(1), (d)(5) and (d)(6), and subdivisions (j) and (p).

(p) Severability

If any provision of this rule is held by judicial order to be invalid, or invalid or inapplicable to any person or circumstance, such order shall not affect the validity of the remainder of this rule, or the validity or applicability of such provision to other persons or circumstances.

**Appendix 1 – Content of Initial Facility Status Reports**

Initial compliance status reports shall contain, at a minimum, the following information:

1. Facility name, District Facility ID number, facility address, owner/operator name, and telephone number.
2. The distance from the property line of the facility to the property line of the nearest commercial/industrial building and sensitive receptor.
3. Worker and sensitive receptor locations, if they are located within one-quarter mile from the center of the facility.
4. Building parameters
  - Stack heights in feet (point sources); or
  - Building area in square feet (volume sources).
5. A description of the types of lead processes performed at the facility.
6. The following information shall be provided for each of the last five calendar years prior to November 5, 2010:
  - Annual amount of lead-containing material processed;
  - The maximum and average daily and monthly operating schedules;
  - The maximum and average daily and monthly lead-processing rates for all equipment and processes;
  - The maximum and average daily and annual emissions of lead from all emission points and fugitive lead-dust sources.
7. The approximate date of intended source tests for all lead emission control devices, as required by subdivision (k) of this rule.
8. Engineering drawings, calculations or other methodology to demonstrate compliance with paragraphs (d)(1) and (k).
9. Air dispersion modeling calculations using procedures approved by the Executive Officer to determine the location of sampling sites as required by subdivision (j).
10. All information necessary to demonstrate means of compliance with subdivision (j).
11. The name, title, and signature of the responsible official certifying the accuracy of the report, attesting to whether the source has complied with the provisions of this rule.
12. The date of the report.

**Appendix 2 – Content of Ongoing Facility Status Reports**

Ongoing facility status reports shall, at a minimum, contain the following information:

1. Facility name, District Facility ID number, facility address, owner/operator name, and telephone number.
2. The beginning and ending dates of the calendar year for the reporting period.
3. The following information shall be provided for each of the last 12 calendar months of the reporting period:
  - Annual amounts of lead-containing material processed;
  - The maximum and average daily and monthly lead-processing rates for all equipment and processes;
  - The maximum and average daily and annual emissions of lead from all emission points and fugitive lead-dust sources.
4. Worker and sensitive receptor distances, if they are located within ¼ of mile from the center of the facility and facility maximum operating schedule, if changed since submittal of the initial compliance status report or prior year's ongoing compliance status and emission reports.
5. A description of any changes in monitoring, processes, or controls since the last reporting period.
6. The name, title, and signature of the responsible official certifying the accuracy of the report.
7. The date of the report.

**Appendix 3 – Continuous Furnace Pressure Monitoring (CFPM) Plan**

The CFPM Plan shall, at a minimum, contain the following information:

1. A description of the type and design of the differential pressure monitoring device(s).
2. The specifications of the resolution, increment of measurement, and range of the differential pressure monitoring device(s).
3. A drawing and description of the exact location where each differential pressure monitoring device is to be located.
4. If differential pressure monitoring device(s) are already installed, all available recorded data of the static differential furnace pressure(s) as requested by the Executive Officer.
5. If applicable, the maximum alternative static differential furnace pressure in inches water column that the owner or operator will operate the reverberatory furnace at, and a demonstration that it can achieve emission reductions that are equivalent to or better than those achieved when operating at a pressure of -0.02 or more negative. The alternative static differential furnace pressure shall not exceed 0.4 inches water column.



**ATTACHMENT G**

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

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**Final Staff Report  
Proposed Amended Rule 1420.1 – Emission Standards for Lead and Other  
Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities**

**August 2015**

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**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
GOVERNING BOARD**

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## **APPENDIX A - JUSTIFICATION FOR LOWERING AMBIENT AIR TO 0.100 $\mu\text{g}/\text{m}^3$**

## **REFERENCES**

## INTRODUCTION

Rule 1420.1 – Emission Standards for Lead from Large Lead-Acid Battery Recycling Facilities controls emissions of lead and other toxic air contaminants from large lead-acid battery recycling facilities. The rule applies to lead-acid battery recycling facilities that process more than 50,000 tons of lead annually, namely Exide Technologies located in Vernon, and Quemetco Inc. located in the City of Industry. The rule includes ambient lead and arsenic concentration limits, facility mass point source limits, as well as housekeeping and maintenance provisions such as regular cleaning periods, inspections and proper handling of lead containing dust and waste.

In January 2014 the SCAQMD staff reported to the Governing Board on the review of two studies that examined the technical, economic, and physical feasibility of achieving a total facility mass lead emission rate of 0.003 lb/hour from all lead point sources. Based on elevated levels of lead found in soil and surface dust at Exide by the California Department of Toxic Substances Control (DTSC), the Governing Board directed staff to begin rulemaking. In March 2015 the Governing Board adopted amendments to the rule lowering the ambient lead concentration limit to 0.100  $\mu\text{g}/\text{m}^3$  effective in 2017 and the point source lead emission rate to 0.023 lb/hour effective in 2016, as well as adding other housekeeping and maintenance measures. The Governing Board also directed staff to return to the Governing Board with a rule proposal to further lower the point source lead emission rate to 0.003 lb/hour and other options. Shortly thereafter, one of the two facilities, Exide Technologies, announced that it was permanently closing.

## BACKGROUND

### Lead

Lead is deemed a toxic air contaminant (TAC) and probable human carcinogen by the Office of Environmental Health Hazard Assessment (OEHHA). Chronic health effects include nervous and reproductive system disorders, neurological and respiratory damage, cognitive and behavioral changes, and hypertension. Exposure to lead can also potentially increase the risk of contracting cancer or result in other adverse health effects. Lead has been classified as a probable human carcinogen by the International Agency for Research on Cancer, based mainly on sufficient animal evidence, and is reasonably anticipated to be a human carcinogen by the U.S. National Toxicology Program. Young children are especially susceptible to the effects of environmental lead because their bodies accumulate lead more readily than do those of adults, and because they are more vulnerable to certain biological effects of lead including learning disabilities, behavioral problems, and deficits in IQ.

Under the federal Clean Air Act, lead is classified as a “criteria pollutant.” Lead has observed health effects at ambient concentrations. The U.S. EPA has thoroughly reviewed the lead exposure and health effects research, and has prepared substantial documentation in the form of a Criteria Document to support the selection of the 2008 NAAQS for lead. The Criteria Document used for the development of the 2008 NAAQS for lead states that studies and evidence strongly substantiate that blood lead levels in a range of 5-10  $\mu\text{g}/\text{dL}$ , or possibly lower, could likely result in neurocognitive effects in children. There is substantial scientific justification provided through EPA’s development of the 2008 Lead NAAQS and the 2015 Proposed Rule to Retain the Current Lead NAAQS evidence-based framework to support the policy decision to establish

more protective rule limits. As a regional air agency, developing a source-specific rule for lead-acid battery recycling facilities, the SCAQMD staff is recommending policy decisions that are more health protective for communities, particularly young children, that are affected by lead-acid battery recycling facilities regulated under Proposed Rule 1420.1.

### **Lead National Ambient Air Quality Standard**

In October 1978, the U.S. Environmental Protection Agency (EPA) promulgated the first primary and secondary NAAQS for lead under Section 109 of the Clean Air Act. Both primary and secondary standards were set at a level of  $1.5 \mu\text{g}/\text{m}^3$  averaged over a calendar quarter. Primary standards set limits to protect public health, including the health of “sensitive” populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against visibility impairment, damage to animals, crops, vegetation, and buildings.

On October 15, 2008, the EPA amended both the primary and secondary NAAQS for lead from a level of  $1.5 \mu\text{g}/\text{m}^3$  to  $0.15 \mu\text{g}/\text{m}^3$  averaged over a rolling 3-month period, and made changes to monitoring and reporting requirements. On December 31, 2010, the EPA designated a portion of Los Angeles County as nonattainment for the 2008 NAAQS for lead based on monitored air quality data from 2007-2009 that indicated a violation of the NAAQS near and due to a large lead-acid battery recycling facility. In May of 2014, the U.S. EPA released its “Policy Assessment for the Review of the Lead National Ambient Air Quality Standards”, reaffirming the primary (health-based) and secondary (welfare-based) staff conclusions regarding whether to retain the current standards. In January 2015 the U.S. EPA announced their proposal to retain the ambient lead concentration standard of  $0.15 \mu\text{g}/\text{m}^3$  averaged over a rolling 3-month period.

### **Arsenic**

Arsenic is a known human carcinogen by inhalation and oral routes of exposure (NTP, 2011). Occupational exposure to inorganic arsenic compounds, especially in mining and copper smelting, has been associated with increased risk of lung cancer. Exposure to arsenic also has been associated with increased risks of cancer of the kidney, digestive tract, and lymphatic and hematopoietic systems. Exposure to arsenic in drinking water increases the risks of urinary-bladder, kidney, skin, lung, liver, and colon cancer.

Arsenic is listed under California Proposition 65 as a developmental toxicant. The oxidation state influences the toxicity, with trivalent arsenic compounds possessing greater teratogenic potential than pentavalent compounds. In studies with laboratory animals, reproductive effects observed include increased fetal death, decreased fetal weight, and congenital anomalies. Reported adverse effects of chronic inorganic arsenic exposure in children include skin lesions, neurodevelopment effects such as decreased IQ and related effects, risk of lung disease expressed in later years, and reproductive effects. Several studies have reported effects on the developing intellectual function of exposed children (OEHHA, 2008). The Office of Environmental Health Hazard Assessment (OEHHA) adopted long term and 8-hour Reference Exposure Levels for arsenic to be protective against neurological effects in children. Breathing high levels of inorganic arsenic can result in a sore throat or irritated lungs. Ingesting very high levels of arsenic can result in death. Exposure to high levels can cause nausea and vomiting, decreased production of red and white blood cells, abnormal heart rhythm, damage to blood

vessels, and a sensation of "pins and needles" in hands and feet. Ingesting inorganic arsenic for a long time can cause a darkening of the skin and the appearance of small "corns" or "warts" on the palms, soles, and torso. Skin contact with inorganic arsenic may cause redness and swelling.

### **Closure of Exide Technologies of Vernon, CA**

On April 7, 2015 Exide Technologies withdrew their California Department of Toxic Substance Control (DTSC) permit application and provided notification of its intent to permanently close. On May 15, 2015, Exide Technologies submitted a revised Closure Plan to DTSC. The Closure Plan describes the current status of the facility and contains decontamination and demolition plans. The Closure Plan also includes groundwater monitoring information, engineering controls, waste characterization, and air monitoring plans. The Closure Plan is separate from, but is occurring simultaneously with, the DTSC Corrective Action imposed on Exide. The Corrective Action requires off-site cleanup of nearby residential and industrial areas as well as cleanup of on-site contaminated groundwater.

The closure is expected to occur in three phases. Phase 1 will address the inventory removal, equipment decontamination and removal, decontamination and deconstruction of buildings, and soil sampling. Exide will retain a third-party environmental consultant to monitor and document implementation of dust mitigation measures and to conduct real-time air monitoring. Exide plans to continue operating air pollution control equipment to maintain negative pressure on associated buildings until the inventory is removed and gross cleaning of duct work is complete. Once the duct work has been removed up to the emission control equipment, the duct shall be blinded and the interior of the equipment cleaned following the manufacturer's operating procedures. Staff has recommended that Exide operate the total enclosures with all associated ducting until the enclosure structure itself is demolished. Decontamination of structures will be done under negative pressure by vacuum cleaning vented to HEPA filters and then pressure washing.

Phase 2 will address potential below-grade decontamination. These additional activities may require the removal of contaminated soil beneath the concrete floor at the closure areas; capping and installation of boundary markers where contaminated soils are left in place; and development of a deed notice/land use covenant. The scope of Phase 2 will be determined using data generated during Phase 1 and may be influenced by data generated during the Corrective Action. Generally areas will be excavated to a depth of five feet in and around structures. Dust control measures such as temporary enclosures and water will be used during floor removal and excavation activities. The temporary enclosure will remain in-place and/or the area will be covered until the excavation is complete.

When Phase 1 and Phase 2 are completed, the facility will submit certification by both the facility and an independent, qualified engineer registered in the State of California within 60 days of the completion of final closure, to DTSC, SCAQMD and the City of Vernon. This certification will state that the facility has been closed in accordance with the approved closure plan. Phase ~~H~~1 of the closure is expected to commence March 2016 and be completed by May 2018. Phase ~~H~~2 is scheduled for completion by June 2020.

Phase 3 (ongoing) would include postclosure and contingent postclosure work to implement long-term inspections, monitoring, and maintenance. Phase 3 is scheduled to last until 2049.

### Rule 1420.1 Regulatory History

Large lead-acid battery recycling facilities were originally regulated under Rule 1420 - Emission Standards for Lead which was adopted in 1992 and is applicable to any facility that uses or processes lead-containing materials. In November 2010, Rule 1420.1 was adopted to establish additional requirements for large facilities that process more than 50,000 tons of lead annually to ensure compliance with the NAAQS. Rule 1420.1 included an ambient lead concentration limit of  $0.150 \mu\text{g}/\text{m}^3$  and a point source limit of 0.01 lb/hour from any single source and 0.045 lb/hour from all point sources. Additionally, the rule included a series of housekeeping provisions to further control fugitive lead emissions. ~~The Governing Board strengthened the rule by requiring facilities to submit a compliance plan identifying additional lead reductions strategies, a curtailment plan, and a study assessing the economic, technical, and physical feasibility of achieving a lower point source emission limit of 0.003 lb/hour, if the ambient lead concentration exceeded  $0.120 \mu\text{g}/\text{m}^3$  over a 30-day rolling average.~~

In March 2013, the approved AB 2588 Health Risk Assessment for Exide Technologies reported a Maximum Individual Cancer Risk (MICR) of 156 in one million, a non-cancer chronic hazard index (HI) of 63, a non-cancer acute HI of 3.8, and a cancer burden of 10. To put this in perspective, the Action Risk Level triggering risk reduction requirements in Rule 1402 – Control of Toxic Air Contaminants from Existing Sources, are 25 in one million for MICR, 3.0 for chronic or acute HI, or a cancer burden of 0.5. Arsenic, and to a lesser extent benzene, and 1,3-butadiene emissions were the main contributors to the high cancer risk. As a result, on January 10, 2014, Rule 1420.1 was amended to include an arsenic ambient concentration limit of  $10.0 \text{ ng}/\text{m}^3$  averaged over a 24-hour period and point source emission limits for arsenic, benzene, and 1,3-butadiene. Curtailment provisions for lead and arsenic and requirements for installation and operation of differential pressure monitors were also included in the amendments. The Governing Board also strengthened the rule by requiring facilities to submit a compliance plan identifying additional lead reduction strategies, a curtailment plan, and a study assessing the economic, technical, and physical feasibility of achieving a lower point source emission limit of 0.003 lb/hour, if the ambient lead concentration exceeded  $0.120 \mu\text{g}/\text{m}^3$  over a 30-day rolling average.

In March 2014, Rule 1420.1 was amended to include requirements for the large lead-acid battery recycling facilities to participate in a multi-metals continuous emissions monitoring program with the SCAQMD.

The rule was recently amended in March 2015, to further lower the ambient lead concentration limit to  $0.120 \mu\text{g}/\text{m}^3$  effective January 1, 2016 and  $0.100 \mu\text{g}/\text{m}^3$  effective January 1, 2017 and to lower the point source lead emission rate to 0.023 lb/hour, as well as adding additional housekeeping and maintenance requirements. The Governing Board also directed staff to return to the Governing Board with a rule proposal to lower the point source lead emission rate to 0.003 lb/hour and other options.

## PROPOSED AMENDED RULE 1420.1

Proposed Amended Rule (PAR) 1420.1 would include revisions to the lead point source emission rate, clarify rule applicability, and add additional provisions for facility closures.

### Applicability

The proposed rule will clarify that Rule 1420.1 remains applicable to lead-acid battery recycling facilities during closure activities. PAR1420.1 expressly states that the rule requirements apply until the proposed closure requirements in paragraph (p)(4) are satisfied. The clarification of the continued applicability of the rule and the imposition of additional closure requirements are necessary to ensure that attainment with the lead NAAQS will be maintained and that surrounding communities suffer no degradation in air quality during closure, including demolition, cleanup and decontamination activities.

### Lead Point Source Emission Rate

PAR 1420.1 will lower the lead point source emission limit. Staff is proposing to reduce the total facility mass lead emissions from all lead point sources under subparagraph (f)(1)(A) from 0.045 lb/hour to 0.003 lb/hour, effective on the date of adoption. As seen in Table 1 below, the point source emission rates at Quemetco were all below the proposed emission limit. The lead emission rates have been achieved in practice based on more than six years of testing and six years of operation at Quemetco. Exide will not experience difficulty in meeting this requirement because it has permanently ceased operations.

**Table 1 – Quemetco Lead Point Source Test Rates  
(Test Method 436, three run average)**

Test Date	Lead Emission Rate (lb/hour)	Lead Emission Rate (lb/year)
Nov 2008	0.001	8.8
Nov 2009	0.0002	1.4
Nov 2010	0.0005	4.0
Sep 2012	0.0003	2.2
Nov 2013 <sup>a</sup>	0.0005	4.2
Nov 2013 <sup>b</sup>	0.0005	4.6
Feb 2014	0.0003	3.0
Proposed	0.003	26.3

a. Quetmeco co-testing

b. SCAQMD co-testing



### Source Testing

PAR 1420.1 will require annual source testing for point sources that emit lead. Currently, facilities are allowed biennial source testing if the lead point source emits 5% or less than the current lead point source emission rate in the rule. With the proposed lead point source emission rate being lowered to 0.003 lb/hour, the biennial source test rate would drop to 0.00015 lb/hour. This level has not been achieved during any source test and retaining this option is no longer feasible.

### Curtailement Provisions

Staff is proposing to reduce the lead point source emission rate ~~and arsenic ambient concentration limit~~ effective upon adoption. Under the current provisions of Rule 1420.1, sources are required to curtail their process if they exceed either ambient limits or total facility mass emission rates. The rate of curtailment is dependent on the level of exceedance with the first tier coinciding with the respective limits as found in Tables 1 and 2 of Rule 1420.1. Thus, effective upon adoption, ~~the first tier of the monitored ambient air concentration rate for mandatory daily process curtailments in Table 1 of subparagraph (p)(1) and the first tier of the total facility mass emission rate for process curtailments in Table 2 of subparagraph (p)(2)~~ will be reduced to coincide with the proposed limits.

### Facility Closure

The proposed amendments clarify the applicability of existing provisions and include new provisions for lead-acid battery recycling facility owners and operators to ensure no degradation to air quality occurs during facility closure activities such as demolition, decontamination, and cleanup. Facility closure entails permanently stopping production and notifying the Executive Officer in writing that the facility will no longer be in operation.

In the proposal, facilities that are going through the closure process of decontamination and demolition will be required to continue conducting daily lead and arsenic ambient monitoring (paragraphs (d)(1), (d)(5) and (d)(6)) and submit a Compliance Plan for Closure Activities. The Compliance Plan for Closure Activities would be submitted in advance of decontamination and demolition actions taking place and approved by the Executive Officer. It would specify the logistics of meteorological and ambient monitoring, air emission controls, housekeeping and maintenance measures, and contingency measures to be taken to prevent lead or arsenic ambient exceedances. The housekeeping and maintenance measures in the plan are expected to be drawn from housekeeping and maintenance provisions in the existing rule as well as measures proposed in the closure plan submitted to DTSC. The facility can tailor the plan to address specific decontamination or demolition procedures. For example, the plan could include building washing provisions while the building remains intact but discontinuing building washing provisions once the buildings have been demolished. Similarly, depending on the nature of the closure activities, the washing schedule may be more or less stringent than the washing schedule used during normal operations. The plan is expected to be updated as closing activities proceed to provide added flexibility. The plan would also require that contingency provisions be included that can be implemented in the event there is an exceedance of the lead or arsenic ambient concentrations. ~~These contingency plans measures~~ would likely be additional applicable housekeeping and maintenance measures such as increased frequency of washing, sweeping and vacuuming as well as specific measures for demolition-related emissions.

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If the lead or arsenic ambient concentrations exceed rule requirements, all closure related activities that contributed to the exceedances, as determined by the Executive Officer, shall be suspended until contingency measures in the approved Compliance Plan for Closure Activities ~~can be~~ implemented. If the exceedance is due to an activity not addressed by the contingency measures, then a revised Compliance Plan for Closure Activities will be required to be submitted and approved by the Executive Officer before closure-related activities that contributed to the exceedances can resume. While the revised plan is not intended to be as comprehensive as the Compliance Plan for Closure Activities, it is necessary to address the cause of the exceedances prior to resuming closure activities to ensure that attainment with the lead NAAQS will be maintained and that surrounding communities suffer no degradation in air quality.

Facilities will be required to continue monitoring and abiding by the Compliance Plan for Closure Activities until the lead-acid battery recycling facility has surrendered all SCAQMD permits to the Executive Officers, submitted DTSC-approved certification of final closure to SCAQMD, receives written confirmation from the Executive Officer that final closure has been verified, and demonstrates there are no exceedances of ambient lead or arsenic concentrations have occurred for 12 consecutive months, with at least one month occurring after the date of submittal of certification of final closure.

### **Exemption**

An exemption has been included to specify which provisions of the rule do not apply to a facility that has permanently ceased production and has notified the Executive Officer in writing that the facility is permanently closing. If the facility has ceased production, point source emission rate limits, operational Compliance Plans, source testing and curtailment of production requirements are no longer necessary.

## COMMENTS AND RESPONSES

**Comment 1:** The proposed rule requires a permanently closing facility to submit a Compliance Plan for Closure Activities (“Closure Compliance Plan”) for review and approval before starting the closure process. For numerous reasons, Exide does not believe this provision should be in the rule. The District’s proposed requirement for a Closure Compliance Plan likely is preempted by State law and conflicts with DTSC’s statutory authority over hazardous waste facility closure. According to the Health and Safety Code, DTSC has jurisdiction over hazardous waste facility closure. The Closure Compliance Plan also creates other potential legal and logistical conflicts. If the District refuses to approve the air emission control requirements approved by DTSC, the affected hazardous waste facility would have no alternatives and would have no reasonable way to satisfy both agencies.

**Response:** SCAQMC disagrees that PAR 1420.1 is preempted (expressly or impliedly) by State law. To the contrary, the statutes governing hazardous waste control expressly state: “No provision of this chapter shall limit the authority of any state or local agency in the enforcement or administration of any provision of law which it is specifically permitted or required to enforce and administer.” (Cal. Health & Saf. Code §25105.) Thus, even though DTSC has authority with respect to the closure of hazardous waste facilities, SCAQMD retains its authority to regulate air emissions from stationary sources. In addition, there are no legal or logistical conflicts between DTSC requirements and PAR 1420.1. DTSC’s regulatory authority is flexible such that its plans and schedule are subject to amendment and modification. (See e.g., Cal. Health & Saf. Code §25247; 22 Cal. Code Regs, tit. 22, §66265.112(c).) Similarly, PAR 1420.1 and the Compliance Plan for Closure Activities provides flexibility for a facility based on the specific circumstances encountered. Instead of having to to comply with all the operational, housekeeping, maintenance, source testing and other current provisions in the rule for a fully operational lead-acid battery recycling facility, it is envisioned that the plan will contain the air emission control requirements approved by DTSC, some housekeeping and maintenance provisions from the current rule and contingency measures in the event of an exceedance. The plan would be regularly updated by Exide to allow for rapid changes that could not be accommodated by the rule development process. That plan also allows the SCAQMD to enforce dust minimization provisions to avoid exceedances of the rule and of the lead NAAQS. As noted by Exide, SCAQMD and DTSC have been working cooperatively in developing the air emission control requirements and that process is expected to continue throughout the entire closure process.

**Comment 2:** Exide appreciates that the District wants to avoid ambient air exceedances, but eliminating the provision in the rule requiring a Closure Compliance Plan has no impact on the District’s ability to take enforcement action against Exide if there is an exceedance. The District can still take actions it deems necessary to enforce its air quality rules. The District does not need to grant itself pre-approval authority over the closure process in order to enforce its existing air quality rules.

**Response:** The Compliance Plan for Closure Activities is a mechanism to provide the SCAQMD with an opportunity to prevent exceedances while allowing the closing facility maximum flexibility during closure. Having agreed-upon air emission control requirements, housekeeping, maintenance, and contingency measures will ~~amplify the need to help~~ avoid exceedances and help to avoid misunderstandings about what is expected during closure. With a plan in place, if there were an exceedance, contingency measures could be adopted immediately. In the situation where an exceedance occurs from an unforeseen closure-related activity, both SCAQMD and DTSC agree that the closure-related activity should be temporarily suspended until a mitigation measures can be implemented. While this may slow closure, SCAQMD and DTSC envision that closure of a lead-acid battery recycling facility is a carefully controlled process that may require detailed technical evaluations and public input.

**Comment 3:** If the Closure Compliance plan is not removed from the rule, then Exide proposes the following rewording of paragraph (p)(3) as follows:

*If during closure the ambient air concentrations of lead or arsenic exceed the limits in paragraphs (d)(1) or (d)(5), the owner or operator shall submit a written report assessing the root cause of the exceedances and, if closure-related activities are determined to have contributed to the exceedances, the owner or operator shall temporarily suspend the closure-related activities that contributed to the exceedances and provide a mitigation plan designed to avoid additional exceedances. The closure-related activities that contributed to the exceedances shall not recommence until the Executive Officer, in consultation with the Department of Toxic Substances Control, approves the mitigation plan and the mitigation measures are implemented.*

This suggested revision balances the District's interest in avoiding additional exceedances while recognizing DTSC's jurisdiction over the closure process and ensuring the efficiency of closure.

**Response:** SCAQMD will continue to require contingency provisions to be included in the Compliance Plan for Closure Activities that can be implemented immediately if closure-related activities are determined to have contributed to an exceedance. If, in the case of an exceedance for which there is no contingency measure included in the plan, the closure-related activity that contributed will be temporarily suspended until a mitigation plan is approved, in consultation with DTSC.

**Comment 4:** Exide requests clarification that "all permits" means "all permits issued by the South Coast Air Quality Management District" and not permits issued by other agencies.

**Response:** "All permits" is limited to SCAQMD permits only and the language has been revised to reflect this clarification.

**Comment 5:** Exide requests clarification that “final closure” has the same definition found in 22 CCR § 66260.10, and does not include postclosure activities.

**Response:** “Final closure” has the same definition found in 22 CCR § 66260.10, and does not include postclosure activities, again as defined in 22 CCR § 66260.10.

**Comment 6:** As written, the proposed rule may apply longer than necessary to confirm compliance. Exide requests that the District shorten the period of consecutive months of compliance with the ambient lead and arsenic limits to allow closure to six months, with one month occurring after the date final closure is certified.

**Response:** SCAQMD believes that a full year of compliance with ambient lead and arsenic limits is necessary to ensure that, under normal circumstances, no further ambient exceedances would be expected indefinitely. A compliance time frame of six months may preclude consideration of changes in weather patterns (i.e. Santa Ana winds, winter storms, etc.) that could impact ambient monitoring.

## ANALYSIS OF ALTERNATIVE CONTROL MEASURES

Health and Safety Code Section 40440.5, subsection (c)(3) requires an analysis of alternative control measures. In March 2015 the Governing Board adopted amendments to the rule lowering the ambient lead concentration limit to 0.100  $\mu\text{g}/\text{m}^3$  effective in 2017 and the point source lead emission rate to 0.023 lb/hour effective in 2016, as well as adding other housekeeping and maintenance measures. During the rule development process, staff considered alternative ambient lead concentration limits and point source lead emission rates. The Governing Board directed staff to return to the Governing Board with a rule proposal to further lower the point source lead emission rate to 0.003 lb/hour and other options. The current rule proposal is a result of Governing Board direction. Additionally, one of the two facilities subject to the rule permanently closed. Staff originally proposed prescriptive closure provisions to address potential fugitive emissions during decontamination and demolition. After consultation with DTSC and interested stakeholders, staff is proposing to require a Compliance Plan for Closure Activities which will allow the facility to specify, upon approval by the Executive Officer, the logistics of meteorological and ambient monitoring, air emission controls, housekeeping and maintenance measures, and contingency measures to be taken to prevent lead or arsenic ambient exceedances.

## SOCIOECONOMIC ASSESSMENT

PAR 1420.1 would include revisions to the lead point source emission rate and facility closure provisions.

### Affected Facilities and Industries

The proposed amendments affect two facilities that process greater than 50,000 tons of lead annually. These two facilities belong to the industry of secondary lead smelting, refining, and alloying of nonferrous metal [North American Industrial Classification System (NAICS) 331492].

### Compliance Costs

The proposed lead point source limit of 0.003 lb/hour has already been achieved by Quemetco. No additional costs are expected.

PAR 1420.1 would also require a facility that is closing to submit a Compliance Plan for Closure Activities. The plan is expected to be updated throughout the closure process. The cost of developing the plan is estimated at \$20,000 for each facility and is expected to be updated annually. PAR 1420.1 would also require additional ambient monitoring for lead and arsenic ~~ambient monitoring~~. The proposal requires twelve consecutive months of ambient test results free of exceedances to cease ambient monitoring. Assuming the ambient monitoring continues after closure is complete, up to six monitors daily will require analysis. The updated cost for each lead and arsenic analysis is \$312. The annual cost to analyze six monitors on a daily basis for an entire year is \$683,280. The total estimated annual cost to comply with the proposed rule is \$703,280 with all of the costs burdening the closing facility.

When the annual compliance cost is less than one million dollars, the Regional Economic Impact Model (REMI) is not used to analyze impacts on jobs and other socioeconomic impacts because the impact results would be very small and would fall within the noise of the model. A major

portion of the socioeconomic report covers the regional jobs and other socioeconomic impacts generated from the REMI model. As such, when the REMI model is not run, the socioeconomic assessment is included in the staff report.

### **Rule Adoption Relative to the Cost-Effective Schedule**

On October 14, 1994, the Governing Board adopted a resolution that requires staff to address whether rules being proposed for adoption are considered in the order of cost-effectiveness. The 2012 Air Quality Management Plan (AQMP) ranked, in the order of cost-effectiveness, all of the control measures for which costs were quantified. It is generally recommended that the most cost-effective actions be taken first. PAR 1420.1 is not a control measure in the 2012 Air Quality Management Plan (AQMP), and thus was not ranked by cost-effectiveness relative to other AQMP control measures in the 2012 AQMP.

## **CALIFORNIA ENVIRONMENTAL QUALITY ACT**

Pursuant to the California Environmental Quality Act (CEQA) and SCAQMD Rule 110, SCAQMD staff ~~will evaluate~~evaluated the proposed project and ~~make~~made the appropriate CEQA determination. The public workshop meeting ~~will also provide~~provided an opportunity to solicit public input on any potential environmental impacts from the proposed project. Comments received at the public workshop on any environmental impacts ~~will be~~were considered when making the CEQA determination.

## **DRAFT FINDINGS UNDER CALIFORNIA HEALTH AND SAFETY CODE SECTION 40727**

### **Requirements to Make Findings**

California Health and Safety Code Section 40727 requires that prior to adopting, amending or repealing a rule or regulation, the SCAQMD Governing Board shall make findings of necessity, authority, clarity, consistency, non-duplication, and reference based on relevant information presented at the public hearing and in the staff report.

### **Necessity**

PAR 1420.1 is needed to further protect public health by reducing lead emissions from large lead-acid battery recycling facilities. For a toxic air contaminant such as lead, for which there is no level of exposure that can yet be identified with confidence as clearly not being associated with some risk of deleterious health effects, the intent of this proposed rule is to further reduce lead emissions to the extent feasible. PAR 1420.1 is also needed to minimize lead exposure during and after facility closure activities.

### **Authority**

The SCAQMD Governing Board has authority to adopt PAR 1420.1 pursuant to the California Health and Safety Code Sections 39002, 39650 et. seq., 40000, 40001, 40440, 40441, 40702, 40725 through 40728, 41508, 41700 and 41706.

### **Clarity**

PAR 1420.1 is written or displayed so that its meaning can be easily understood by the persons directly affected by it.

**Consistency**

PAR 1420.1 is in harmony with and not in conflict with or contradictory to, existing statutes, court decisions or state or federal regulations. The proposed amended rule requirements are in addition to, and consistent with DTSC's authority to regulate hazardous waste and enforce closure plans.

**Non-Duplication**

PAR 1420.1 will not impose the same requirements as any existing state or federal regulations. The proposed amended rule is necessary and proper to execute the powers and duties granted to, and imposed upon, the SCAQMD.

**Reference**

By adopting PAR 1420.1, the SCAQMD Governing Board will be implementing, interpreting or making specific the provisions of the California Health and Safety Code Sections 40001 (rules to achieve and maintain ambient air quality standards), 41700 (nuisance), 41706(b) (emission standards for lead compounds from non-vehicular sources), Federal Clean Air Act Section 112 (Hazardous Air Pollutants), and CAA Section 116.

**COMPARATIVE ANALYSIS**

Health and Safety Code section 40727.2 requires a comparative analysis of the proposed amended rule with any Federal or District rules and regulations applicable to the same source. See Table 3 below.



**Table 3: Comparison of PAR 1420.1 with SCAQMD Rule 1420.1, SCAQMD Rule 1420, the 2008 Lead NAAQS, and the NESHAP for Secondary Lead Smelters**

<b>Rule Element</b>	<b>PAR 1420.1</b>	<b>SCAQMD Rule 1420.1</b>	<b>SCAQMD Rule 1420</b>	<b>CARB 1998-12-30 Non Ferrous Metal Melting ATCM</b>	<b>2008 Lead NAAQS</b>	<b>NESHAP from Secondary Lead Smelting</b>	<b>California Health &amp; Safety Code §25245 et seq</b>	<b>Cal. Code Reg, tit. 22, §66265.110 et seq</b>
Applicability	Rule will apply to owners or operators during closure activities	Lead-acid battery recycling facilities that have ever processed more than 50,000 lead-tons/year	Facilities that use or process lead-containing materials	Facilities that melt non-ferrous metals including lead	All States	Secondary lead smelters	Owner or operator of a hazardous waste facility	Owner or operator of a hazardous waste management facility
Lead Ambient Air Quality Standard	No proposed changes	January 1, 2016, to December 31, 2016 meet 0.110 µg/m <sup>3</sup> averaged over 30 consecutive days. On and after January 1, 2017 meet 0.100 µg/m <sup>3</sup> averaged over 30 consecutive days.	1.5 µg/m <sup>3</sup> averaged over 30 days	None	0.15 µg/m <sup>3</sup> : 3-month rolling average Demonstrated over a 3-year period.	None	None	None
Arsenic Ambient Air Quality Standard	No proposed changes	10.0 ng/m <sup>3</sup>	None	None	None	None	None	None
Total Enclosures	No proposed changes	Total enclosures for main areas where processing, handling and storage of lead-containing materials occur	None	Enclosed storage area for dust-forming material including, but not limited to, dross, ash, or feed material	None	Total or partial enclosures for: - Smelting furnace and dryer charging hoppers, chutes, and skip hoists; - Smelting furnace lead taps, and molds during tapping; - Refining kettles; - Dryer transition pieces; and Agglomerating furnace product taps	None	None

<b>Rule Element</b>	<b>PAR 1420.1</b>	<b>SCAQMD Rule 1420.1</b>	<b>SCAQMD Rule 1420</b>	<b>CARB 1998-12-30 Non Ferrous Metal Melting ATCM</b>	<b>2008 Lead NAAQS</b>	<b>NESHAP from Secondary Lead Smelting</b>	<b>California Health &amp; Safety Code §25245 et seq</b>	<b>Cal. Code Reg, tit. 22, §66265.110 et seq</b>
Emission Standard and Requirements for Lead Control Devices	Total facility mass emission rate of 0.003 lb/hour of lead from all lead point sources;  Maximum emission rate, use of filters and secondary lead controls on dryer remain unchanged.	Total facility mass emission rate of 0.023 lb/hour of lead from all lead point sources; maximum emission rate of 0.010 lb/hour of lead for any individual lead point source  Use of filters or bags that are rated by the manufacturer to achieve 99.97 percent control efficiency on 0.3 micron particles or made of PTFE membrane material Secondary lead controls on dryer	99% control efficiency for particulate matter; 98% control efficiency for lead	99% control efficiency	None	Concentration of 2.0 mg/dscm from lead point sources	None	None
Compliance Plan	Additional Compliance Plan for Closure Activities required to address emissions during closure	Only required if a facility exceeds ambient lead concentration limit of 0.110 µg/m <sup>3</sup> from January 1, 2016 to December 31, 2016 or 0.100 µg/m <sup>3</sup> on or after January 1, 2017 Identifies additional lead control measures beyond the rule.	Specifies general facility information	None	None	None	Hazardous waste facility closure and postclosure plan	<ul style="list-style-type: none"> <li>- Closure plan which includes schedule, description of decontamination, soil and groundwater monitoring</li> <li>- Process to amend closure plan</li> <li>- Notification requirements</li> </ul>
Ambient Air Monitoring Requirements	- Monitoring required during facility closure activities	Daily sampling for lead and arsenic  Provisions included for monitor failure	Minimum of two monitors at facility locations approved by the Executive	None	For states, a minimum of:  - One source-oriented monitor	None	None	None

Rule Element	PAR 1420.1	SCAQMD Rule 1420.1	SCAQMD Rule 1420	CARB 1998-12-30 Non Ferrous Metal Melting ATCM	2008 Lead NAAQS	NESHAP from Secondary Lead Smelting	California Health & Safety Code §25245 et seq	Cal. Code Reg, tit. 22, §66265.110 et seq
		<p>One year sample retention</p> <p>Minimum of four monitors at facility locations approved by the Executive Officer</p> <p>Samples collected at least once every three days</p> <p>Results reported monthly</p> <p>Daily sampling if 0.120 µg/m<sup>3</sup> is exceeded after January 1, 2015</p>	<p>Officer</p> <p>Samples collected every six days</p> <p>Results reported quarterly</p>		<p>at all facilities emitting 1.0 tons of lead/year; and</p> <ul style="list-style-type: none"> <li>- One non-source-oriented monitor in urban areas with a population of at least 500,000 people</li> <li>- Samples collected every six days</li> </ul>			
Housekeeping and Maintenance Requirements	<ul style="list-style-type: none"> <li>- Housekeeping and Maintenance required during facility closure activities</li> </ul>	<p>Prescribed requirements for cleaning frequencies of specific areas; maintenance activity; building integrity inspections; storage and transport of lead-containing materials; onsite mobile sweeping; and surface impoundment cleanings</p>	<p>Requirements for storage of dust-forming material; weekly cleaning of surfaces subject to vehicular or foot traffic; and storage, disposal, recovery, and recycling of lead or lead-containing wastes generated from housekeeping activities</p>	<p>Surfaces subject to vehicular or foot traffic shall be vacuumed, wet mopped or otherwise maintained</p>	<p>None</p>	<p>Periodic wash down of plant roadways (lower frequency than PAR 1420.1); wet suppression of battery breaking area storage piles; vehicle wet washing of vehicles exiting the materials handling and storage areas</p>	<p>None</p>	<p>None</p>
Reporting Requirements	<ul style="list-style-type: none"> <li>- No proposed changes</li> </ul>	<ul style="list-style-type: none"> <li>- Reporting to Executive Officer within 72 hours of daily ambient air lead concentration of 0.300 µg/m<sup>3</sup> with the following information:</li> </ul>	<p>Ambient air lead and wind monitoring for any lead-processing facility that is required or elects to do ambient air monitoring</p>	<ul style="list-style-type: none"> <li>- Source test results</li> <li>- Amount of metal processed if requesting exemption</li> </ul>	<p>For states:</p> <ul style="list-style-type: none"> <li>- State Implementation Plan submittal;</li> <li>- Periodic emissions reports from stationary source monitors;</li> <li>- Ambient air</li> </ul>	<ul style="list-style-type: none"> <li>- Lead control alarm/failure reports including fugitive dust control measures performed during failures</li> </ul>	<p>- None</p>	<p>- None</p>

Rule Element	PAR 1420.1	SCAQMD Rule 1420.1	SCAQMD Rule 1420	CARB 1998-12-30 Non Ferrous Metal Melting ATCM	2008 Lead NAAQS	NESHAP from Secondary Lead Smelting	California Health & Safety Code §25245 et seq	Cal. Code Reg, tit. 22, §66265.110 et seq
		<ul style="list-style-type: none"> <li>o Date of the occurrence;</li> <li>o Name of the monitor;</li> <li>o Ambient lead concentration at the monitor for the 24 hour sample;</li> <li>o Potential cause or causes of the occurrence; and</li> <li>o Potential remedies to prevent the reoccurrence.</li> <li>o Caution signs posted at entrances and perimeter</li> </ul> Notification of breach of total enclosure			quality data and associated assurance data			
Facility Closure	<ul style="list-style-type: none"> <li>- Continue ambient monitoring of lead and arsenic</li> <li>- Submit Compliance Plan for Closure Activities to minimize lead and arsenic emissions during closure</li> <li>- Establish end of rule applicability</li> </ul>	- None	- None	- None	- None	- None	<ul style="list-style-type: none"> <li>- Financial assurances that facility can be closed and maintained for 30 years</li> <li>- Submit facility closure and postclosure plans to estimate cost of closure and subsequent maintenance and to protect public health or safety, or the environment.</li> </ul>	<ul style="list-style-type: none"> <li>- Close facility in manner than minimizes maintenance and protects human health and environment</li> <li>- Schedule for removal of wastes</li> <li>- Interim procedures while facility is unclosed but not operating</li> <li>- Proper disposal of equipment, structures and soil</li> <li>- Certification of closure</li> </ul>

Rule Element	PAR 1420.1	SCAQMD Rule 1420.1	SCAQMD Rule 1420	CARB 1998-12-30 Non Ferrous Metal Melting ATCM	2008 Lead NAAQS	NESHAP from Secondary Lead Smelting	California Health & Safety Code §25245 et seq	Cal. Code Reg, tit. 22, §66265.110 et seq
								<ul style="list-style-type: none"> <li>- Post-closure care and use of property limitations</li> <li>- Post-closure amendment procedures and public notifications</li> <li>- Post-closure certification</li> </ul>

**APPENDIX A - JUSTIFICATION FOR LOWERING AMBIENT AIR TO  
0.100  $\mu\text{G}/\text{M}^3$**

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## JUSTIFICATION FOR LOWERING AMBIENT AIR TO 0.100 $\mu\text{g}/\text{m}^3$

The following provides the justification for the ambient lead limit included in Rule 1420.1. An ambient concentration limit of 0.100  $\mu\text{g}/\text{m}^3$  is supported by scientific information presented during the development of the 2008 Lead National Ambient Air Quality Standard (NAAQS) and the 2015 Proposed Rule to Retain the Current Lead NAAQS. The following discusses the general approach and key assumptions that were the basis of EPA's evaluation of the Lead NAAQS. As explained in more detail below, in proposing an ambient concentration limit of 0.100  $\mu\text{g}/\text{m}^3$ , the SCAQMD made policy decisions that are more protective of human health than the choices made by EPA in proposing to retain an ambient concentration limit of 0.15  $\mu\text{g}/\text{m}^3$ . In particular, the SCAQMD proposes a more prophylactic approach for protecting the health of children, particularly those under five years of age, that live in communities near lead-acid battery recycling facilities in the Basin. We also note that, while EPA has proposed retaining its existing standard of 0.150  $\mu\text{g}/\text{m}^3$ , it has not finalized whether to lower the standard or not. (EPA, 2015)

### *Establishing the 2008 Lead NAAQS and the 2015 Proposed Rule to Retain the Current Lead NAAQS*

The 2008 Lead NAAQS and 2015 Proposed Rule to Retain the Current Lead NAAQS reflect an evidenced-based framework that took into consideration the much-expanded evidence on the neurocognitive health effects of lead in children. EPA focused on the developmental neurotoxicity in children, with IQ decrement as the risk metric. After examining the wide variety of health endpoints associated with lead exposures, EPA concluded that "there is general consensus that the developing nervous system in young children is the most sensitive and that neurobehavioral effects (specifically neurocognitive deficits), including IQ decrements, appear to occur at lower blood levels than previously believed (i.e., at levels <10  $\mu\text{g}/\text{dL}$ ). (EPA, 2008)

In establishing the lead NAAQS, the EPA used an evidence-based framework, referred to as the air-related IQ loss framework, which shifts focus from identifying an appropriate target population mean blood lead level and instead focuses on the magnitude of effects of air-related lead on neurocognitive functions such as IQ loss (73 FR 66971). The two primary inputs to EPA's evidence-based, air-related IQ loss framework are air-to blood ratios and concentration-response (C-R) functions for the relationship between blood lead and IQ response in young children. The framework derives estimates of mean air-related IQ loss through multiplication of the following factors:

- Ambient lead standard level ( $\mu\text{g}/\text{m}^3$ ),
- Air-to-blood ratio in terms of  $\mu\text{g}/\text{dL}$  blood lead per  $\mu\text{g}/\text{m}^3$  air concentration, and
- Slope for the concentration-response (C-R) function in terms of points IQ decrement per  $\mu\text{g}/\text{dL}$  blood lead.

Application of the framework also entailed consideration of an appropriate level of protection from air-related IQ loss to be used in conjunction with the framework, such as an average of level of IQ loss and an adequate margin of safety. The framework provides for estimation of a mean air-related IQ decrement for young children in the high end of the national distribution of air-related exposures. It does so by focusing on children exposed to air-related lead in those

areas with elevated air lead concentrations equal to specific potential standard levels. (EPA, 2014).

### ***Air-to-Blood Level Ratio***

The air-to-blood level ratio represents the relationship between the lead concentration in the air measured in  $\mu\text{g}/\text{m}^3$  and the associated blood lead level measured in  $\mu\text{g}/\text{dL}$ . A ratio of 1:5 means that 1  $\mu\text{g}/\text{m}^3$  increase of lead in the air will result in a blood lead level of 5  $\mu\text{g}/\text{dL}$  for a given population. In the 2008 Lead NAAQS and 2015 Proposed Rule to Retain the Current Lead NAAQS, EPA concluded that for each  $\mu\text{g}/\text{m}^3$  increase of lead in air, children's blood lead levels increase by 5–10  $\mu\text{g}/\text{dL}$ , i.e., the air-to-blood ratio ranged from 1:5 to 1:10. EPA selected an air-to-blood ratio of 1:7 “as a generally central value within this range.” (73 FR 67002-67004).

### ***Concentration-Response Functions***

In establishing the 2008 Lead NAAQS and the 2015 Proposed Rule to Retain the Current Lead NAAQS, EPA considered the evidence regarding the quantitative relationships between IQ loss and blood lead levels. EPA focused on those concentration-response functions that are based on blood lead levels which most closely reflect today's population of children in the U.S., although recognizing that the evidence does not include analyses involving mean blood lead levels as low as the mean blood lead level for today's children. EPA identified four analyses that have a mean blood lead level closest to today's mean for U.S. children; these yielded four slopes ranging from -1.56 to -2.94, with a median of -1.75 IQ points per  $\mu\text{g}/\text{dL}$ . In addition, the Administrator determined that it is appropriate to give more weight to the central estimate for this set of functions, which is the median of the set of functions, and not to rely on any one function. (73 FR 67003-67004)

### ***IQ Decrement***

EPA also concluded that the concentration-response relationship between blood level and IQ loss is nonlinear, with greater incremental IQ loss occurring at lower blood lead levels. Accordingly since studies show that the average lead blood levels for children in the United States has decreased over the years, and that even at these lower levels there are significant neurocognitive impacts such as IQ loss, the analyses of children with blood lead levels closest to those of children in the United States today were most relevant. In selecting the lead NAAQS, the EPA Administrator concluded that, “an air-related IQ loss of 2 points should be used in conjunction with the evidence-based framework in selecting an appropriate level for the standard.” (73 FR 67002 - 67005)

### ***Establishing the 2008 Lead NAAQS***

Table 1-1 below summarizes the estimates of air-related mean IQ loss for children exposed to various ambient air lead concentrations and was used in establishing the 2008 Lead NAAQS. As previously discussed, EPA's evidence-based air-related IQ loss framework found that the air-to-blood ratio ranged from 1:10 to 1:5 and the EPA Administrator selected a 1:7 air-to-blood ratio as a generally central value within this range. Based on an air-to-blood ratio of 1:7 and use of a mean air-related IQ loss of no more than 2 points, EPA selected an ambient lead concentration limit of 0.15  $\mu\text{g}/\text{m}^3$  (see highlighted box in Table 1-1). At this level, children's IQ levels would be decreased by 1.8 points, assuming a 1:7 air to blood ratio. At an ambient lead concentration



of  $0.10 \mu\text{g}/\text{m}^3$ , children's IQ level would be decreased by 1.2 points using the same 1:7 air to blood level ratio assumption.

**Table 1-1**  
**Estimates of Air-Related Mean IQ Loss for the Subpopulation of Children Exposed at the Level of the Highlighting an Ambient Lead Concentration Limit of  $0.150 \mu\text{g}/\text{m}^3$**   
**(Source: 73 FR 67005 and 67006)**

Potential level for standard ( $\mu\text{g}/\text{m}^3$ )	Air-related mean IQ loss (points) for the subpopulation of children exposed at level of the standard		
	IQ loss estimate is based on median slope of 4 C-R functions with blood Pb levels closer to those of today's U.S. children (range shown for estimates based on lowest and highest of 4 slopes)		
	Air-to-blood ratio		
	1:10	1:7	1:5
0.50	>5*	>5*	4.4 (3.9-7.4)
0.40		4.9 (4.4-8.2)	3.5 (3.1-5.9)
0.30	5.3 (4.7-8.8)	3.7 (3.3-6.2)	2.6 (2.3-4.4)
0.25	4.4 (3.9-7.4)	3.1 (2.7-5.1)	2.2 (2.0-3.7)
0.20	3.5 (3.1-5.9)	2.5 (2.2-4.1)	1.8 (1.6-2.9)
0.15	2.6 (2.3-4.4)	→ 1.8 (1.6-3.1)	1.3 (1.2-2.2)
0.10	1.8 (1.6-2.9)	1.2 (1.1-2.1)	0.9 (0.8-1.5)
0.05	0.9 (0.8-1.5)	0.6 (0.5-1.0)	0.4 (0.4-0.7)
0.02	0.4 (0.3-0.6)	0.2 (0.2-0.4)	0.2 (0.2-0.3)

\* For these combinations of standard levels and air-to-blood ratios, the appropriateness of the C-R function applied in this table becomes increasingly uncertain such that no greater precision than ">5" for the IQ loss estimate is warranted.

At a level of  $0.15 \mu\text{g}/\text{m}^3$ , the Administrator recognized that use of a 1:10 ratio produces an estimate greater than 2 IQ points and use of a 1:5 ratio produces a lower IQ loss estimate. Given the uncertainties and limitations in the air-related IQ loss framework, the Administrator decided to place primary weight on the results from this central estimate (1:7 ratio) rather than estimates derived using air-to-blood ratios either higher or lower than this ratio. (73 FR 67005).

The 2014 Policy Assessment concluded that "The limited amount of new information available in this review has not appreciably altered the scientific conclusions reached in the last review regarding relationships between Pb in ambient air and Pb in children's blood or with regard to the range of ratios." As a result the EPA Administrator is recommending to maintain the central estimate of 1:7 rather than estimates derived using higher air-to-blood ratios. During the proposed rulemaking for reviewing the 2008 Lead NAAQS, RSR Corporation the parent company of Quemetco provided comments supporting an ambient limit of  $0.100 \mu\text{g}/\text{m}^3$ .

### Selecting a $0.100 \mu\text{g}/\text{m}^3$ Ambient Lead Limit for Rule 1420.1

Rule 1420.1 requires an ambient lead limit of  $0.100 \mu\text{g}/\text{m}^3$  effective January 1, 2017. This is a policy decision that is supported by the same evidence-based framework used to establish the 2008 Lead NAAQS and the 2015 Proposed Rule to Retain the Current Lead NAAQS.

In developing the 2008 Lead NAAQS, EPA recognized that policy judgments must be made regarding the level of health protection and margin of safety. The available evidence supports a range of choices in setting that level. In reviewing all of the scientific information through the development of the 2008 Lead NAAQS and the 2015 Proposed Rule to Retain the Current Lead NAAQS, the EPA Administrator made a series of policy decisions. For example, the Administrator used a "central value" between 1:10 and 1:15 to represent the air-to-blood lead

ratio and a decrement of 2 IQ points, all within the evidence-based framework for establishing a “national” standard for ambient lead. In doing so, the EPA Administrator recognized that:

“...there are currently no commonly accepted guidelines or criteria within the public health community that would provide a clear basis for reaching a judgment as to the appropriate degree of public health protection that should be afforded to protect against risk of neurocognitive effects in sensitive populations, such as IQ loss in children.” (73 FR 67004).

EPA further acknowledged that “different public health policy judgments could lead to different conclusions regarding the extent to which the current standard provides projection of public health with an adequate margin of safety.” (EPA, 2014)

The NAAQS is a national standard for lead which applies uniformly to all parts of the United States. In contrast, Rule 1420.1 is a source-specific rule that regulates lead-acid battery recycling facilities. By establishing an ambient lead limit of  $0.100 \mu\text{g}/\text{m}^3$ , and implementing other requirements in Rule 1420.1, the rule is designed to minimize the release of point source and fugitive lead emissions from lead-acid battery recycling facilities and thereby to minimize the accumulation of lead surface and soil dust, both of which are meant to be more health protective. The proposed level considers that communities with children live around these facilities, and it provides additional protection for the population most at-risk from lead emissions: pre-school children under the age of five. EPA has specifically recognized the significant health risks posed in this instance; “...situations of elevated exposure, such as residing near sources of ambient lead can also contribute to increased blood lead levels and increased risk of associated health effects from air-related lead.” (73 FR 66976)

As discussed below, the EPA Administrator made a series of policy decisions based on evidenced-based air-related IQ loss framework. Two policy decisions that the SCAQMD staff has focused on are the air-to-blood lead ratio and the IQ decrement, particularly as these issues relate to Rule 1420.1 as a source-specific rule. In addition, as discussed below, the SCAQMD staff further considered the vulnerability of children to lead. SCAQMD staff is recommending a more preventative approach with an ambient lead limit of  $0.100 \mu\text{g}/\text{m}^3$  to provide greater health protection for communities, and more specifically for young children, that live near lead-acid battery recycling facilities.

### **1:10 Air-to-Blood Lead Ratio**

An air-to-blood lead ratio of 1:10 would support a more protective standard for children (CHPAC, 2008b). As discussed above, EPA’s evidence-based air-related IQ loss framework found that the air-to-blood lead ratio ranges from 1:10 to 1:5, and the EPA Administrator selected a 1:7 air-to-blood ratio as a “generally central value within this range.” (73 FR 67005 and 67006). As we now explain, the ambient lead concentration limit of  $0.100 \mu\text{g}/\text{m}^3$  under Rule 1420.1 is supported by EPA’s evidence-based air-related IQ loss framework, assuming EPA’s judgment of air-related IQ loss of 2 points and an air-to-blood ratio of 1:10. The SCAQMD’s policy decision to use an air-to-blood ratio of 1:10 is also supported by EPA’s evidence based air-related IQ loss data and is even more health protective, particularly for young children living near lead-acid battery recycling facilities.

An air-to-blood ratio of 1:10 is supported by comments made by scientists, physicians, and researchers. During the development of the 2008 Lead NAAQS, EPA received scientific recommendations from the Clean Air Scientific Advisory Committee (CASAC), a federal advisory committee independently chartered to provide extramural scientific information and advice to the EPA Administrator and other officials of the EPA<sup>1</sup>. The CASAC recommended that EPA consider an air-to-blood ratio “closer to 1:9 to 1:10 as being most reflective of current conditions.” (73 FR 67001). The higher attained blood lead concentrations that are modeled with a ratio of 1:10 would support a more protective standard for children. (CHPAC, 2008b). Similar to the advice from CASAC, many commenters, including EPA’s Children’s Health Protection Advisory Committee, the Northeast States For Coordinated Air Use Management (NESCAUM) and the Michigan Department of Environmental Quality recommended that EPA consider ratios higher than the upper end of the range used in the proposal (1:7), such as values on the order of 1:9 or 1:10 or somewhat higher. They also rejected the lower ratios used in the proposal as being inappropriate for application to today’s children. Commenters supporting such higher ratios cited ratios resulting from a study noted by CASAC (Schwartz and Pitcher, 1989), as well as others by Hayes et al. (1994) and Brunekreef et al. (1983) They also cited air-to-blood ratio estimates from the exposure/ risk assessment (73 FR 67001). The exposure/risk assessment evaluated the quantitative human exposure and health risk assessments in order to inform EPA during the 2008 review of the NAAQS for lead.

As shown in Table 1-2, when EPA’s same evidence-based framework is employed using an air-to-blood ratio of 1:10, with a loss of less than 2 IQ points, the corresponding ambient limit of 0.100 µg/m<sup>3</sup> is necessary to protect public health.

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<sup>1</sup> The CASAC for the 2008 NAAQS is made up of the following members: Rogene Henderson, Ph.D., Chair, Clean Air Scientific Advisory Committee, Scientist Emeritus, Lovelace Respiratory Research Institute; Donna Kenski, Ph.D., Director of Data Analysis, Lake Michigan Air Directors Consortium, (LADCO); Ellis Cowling, Ph.D., University Distinguished Professor At-Large, Emeritus, North Carolina State University; Armistead (Ted) Russell, Ph.D., Georgia Power, Distinguished Professor of Environmental Engineering, Georgia Institute of Technology; James D. Crapo, M.D., Professor, Department of Medicine, National Jewish Medical and Research Center; Jonathan M. Samet, M.D., Professor and Chairman, Department of Epidemiology, Bloomberg School of Public Health, John Hopkins University; Douglas Crawford-Brown, Ph.D., Director, Institute for Environment; and Professor, Department of Environmental Sciences and Engineering, University of North Carolina at Chapel Hill

**Table 1-2**  
**Estimates of Air-Related Mean IQ Loss for the Subpopulation of Children Exposed at the**  
**Level of the Highlighting an Ambient Lead Concentration Limit of 0.100  $\mu\text{g}/\text{m}^3$**   
**(Source: 73 FR 67005 and 67006)**

Potential level for standard ( $\mu\text{g}/\text{m}^3$ )	Air-related mean IQ loss (points) for the subpopulation of children exposed at level of the standard		
	IQ loss estimate is based on median slope of 4 C-R functions with blood Pb levels closer to those of today's U.S. children (range shown for estimates based on lowest and highest of 4 slopes)		
	Air-to-blood ratio		
	1:10	1:7	1:5
0.50	>5*	>5*	4.4 (3.9-7.4)
0.40		4.9 (4.4-8.2)	3.5 (3.1-5.9)
0.30	5.3 (4.7-8.8)	3.7 (3.3-6.2)	2.6 (2.3-4.4)
0.25	4.4 (3.9-7.4)	3.1 (2.7-5.1)	2.2 (2.0-3.7)
0.20	3.5 (3.1-5.9)	2.5 (2.2-4.1)	1.8 (1.6-2.9)
0.15	2.6 (2.3-4.4)	1.8 (1.6-3.1)	1.3 (1.2-2.2)
0.10	→ 1.8 (1.6-2.9)	1.2 (1.1-2.1)	0.9 (0.8-1.5)
0.05	0.9 (0.8-1.5)	0.6 (0.5-1.0)	0.4 (0.4-0.7)
0.02	0.4 (0.3-0.6)	0.2 (0.2-0.4)	0.2 (0.2-0.3)

\* For these combinations of standard levels and air-to-blood ratios, the appropriateness of the C-R function applied in this table becomes increasingly uncertain such that no greater precision than ">5" for the IQ loss estimate is warranted.

### Population Significance of Loss of IQ Points

Communities that are near lead-acid battery recycling facilities can suffer a significant loss of IQ points. In its July 2008 advice to EPA, CASAC commented that “a population loss of 1–2 IQ points is highly significant from a public health perspective.” CASAC further emphasized its view that an IQ loss of 1–2 points should be “prevented in all but a small percentile of the population—and certainly not accepted as a reasonable change in mean IQ scores across the entire population.” Recommendations from several commenters, including the American Academy of Pediatrics (AAP) and state health agencies commenting on this issue, generally agreed with the view emphasized by CASAC that air-related IQ loss of a specific magnitude, such as on the order of 1 or 2 points, should be prevented in a very high percentage (e.g., 99.5%) of the population. (73 FR 67000).

The issue of individual-level versus population-level risk also pertains to the implications of the magnitude of decrease in cognitive function or increase in behavioral problems per unit increase in blood lead level. Although fractional changes in Full Scale Intelligence Quotient (FSIQ), memory, or attention may not be consequential for an individual, they may be consequential on a population level. At that level, small lead-associated decreases in cognitive function could increase the number of individuals at additional risk of educational, vocational, and social failure. It could also decrease the number of individuals with opportunities for academic and later-life success. (EPA, 2013) Small shifts in the population mean IQ can be highly significant from a public health perspective. Such shifts could translate into a larger proportion of the population functioning at the low end of the IQ distribution, as well as a smaller proportion of the population functioning at the high end of the distribution. (EPA, 2013). Additionally, small lead-associated increases in the population mean blood pressure could result in an increase in the proportion of the population with hypertension that is significant from a public health perspective. (EPA, 2013)

### **Ambient Limit of 0.100 $\mu\text{g}/\text{m}^3$ is More Health Protective for Children**

Establishing an ambient limit of 0.100  $\mu\text{g}/\text{m}^3$  will be more protective children that live around facilities subject to Rule 1420.1, particularly younger children. Lead poisoning is a preventable disease. No safe blood level of lead in children has been identified. (CDC, 2012a). Preventing lead exposure rather than responding after the exposure has taken place is consistent with recommendations from the Centers for Disease Control and Prevention's (CDC) Advisory Committee for Childhood Lead Poisoning Prevention, which recommends that the CDC as well as other local, state, and federal agencies "shift priorities to primary prevention." (CDC, 2012b).

Neurocognitive health effects in young children are recognized as the most sensitive endpoint associated with blood lead concentrations. Evidence continues to indicate that neurocognitive effects in young children may not be reversible and may have effects that persist into adulthood. (EPA, 2014). In addition, in a letter to EPA in 2008 the Academy of Pediatrics stated that "No study has determined a level of lead in blood that does not impair child cognition. Further, the effects are long-lasting. Damage to a child's developing brain from lead is not reversible." (AAP, 2008). Similarly, EPA states in its 2013 Integrated Science Assessment for Lead that, "Evidence suggests that some lead-related cognitive effects may be irreversible and that the neurodevelopmental effects of lead exposure may persist into adulthood." (EPA, 2013).

Among the wide variety of health endpoints associated with lead exposures, there is general consensus that the developing nervous system in children is among the sensitive-- if not the most sensitive-endpoints. (73 FR 66976). Multiple epidemiologic studies conducted in diverse populations of children consistently demonstrate the harmful effects of lead exposure on cognitive function. The effects can be measured by IQ decrements, decreased academic performance and poorer performance on tests of executive function. (EPA, 2013). Lead-associated decline of several points might be sufficient to drop that individual into the range associated with increased risk of educational, vocational, and social failure. (EPA 2008). In addition, a study found that in a group of 7-year old children exposed to lead before the age of 3 years old, IQ continued to fall, even after the blood lead level had declined. (AAP, 2008; Chen et al, 2005).

Compounding the effects of lead on developing children are studies indicating that children are more vulnerable than adults when exposed to lead. Air-to-blood ratios are generally higher for children than those for adults, and they are higher for young children than older children. (EPA, 2014). Pre-school children or children under five years old are the most vulnerable to exposure and adverse health effects, and thereby represent the greatest at-risk population. Higher blood lead levels in pre-school aged children compared to the rest of childhood are related to behaviors that increase environmental exposure, such as hand-to-mouth activity. Children may have increased exposure to lead compared with adults because of children's behaviors and activities (including increased hand-to-mouth contact, crawling, and poor hand-washing), differences in diets, and biokinetic factors (absorption, distribution, metabolism, and excretion). (EPA, 2013).

In addition, younger children absorb substantially more lead than adults, especially children below 2 years of age. These children have a faster metabolic rate, resulting in a proportionately greater daily intake of lead through food. They also have a less developed blood-brain barrier

and therefore greater neurological sensitivity; a faster resting inhalation rate; and a rapidly developing nervous system. (OEHHA, 2009). As previously referenced, multiple studies of the relationship between lead exposure and blood lead in children have shown young children's blood lead levels reflect lead exposures from ambient air levels as well as exposure due to lead in surface dust. (EPA, 2014).

Blood lead levels are extensively used as an index or biomarker of exposure by national and international health agencies, as well as in epidemiological and toxicological studies of lead health effects and dose-response relationships. Blood lead concentrations, even those below 10  $\mu\text{g}/\text{dL}$ , are inversely associated with children's IQ scores at three and five years of age, and associated declines in IQ are greater at these concentrations than at higher concentrations. (Canfield, et al, 2003). Based on a growing body of studies concluding that blood lead levels  $<10 \mu\text{g}/\text{dL}$  harm children, the Centers for Disease Control and Prevention (CDC) Advisory Committee on Childhood Lead Poisoning Prevention (ACCLPP) recommends a reference level of 5  $\mu\text{g}/\text{dL}$  to identify children with blood lead levels that are much higher than most children's levels. This level is based on the 97.5th percentile of the National Health and Nutrition Examination Survey (NHANES)'s blood lead distribution in children. This recommendation is grounded on the weight of evidence that includes studies with a large number and diverse group of children with low blood lead levels and associated IQ deficits. Effects at blood lead levels  $< 10 \mu\text{g}/\text{dL}$  are also reported for other behavioral domains, particularly attention-related behaviors and poorer academic achievement. Furthermore, new findings suggest that the adverse health effects of blood lead levels at less than 10  $\mu\text{g}/\text{dL}$  in children extend beyond cognitive function to include cardiovascular, immunological, and endocrine effects. (CDC, 2012a).

The SCAQMD staff believes that the CDC's action to establish a reference level of 5  $\mu\text{g}/\text{dL}$ , in lieu of the previous "level of concern" of 10  $\mu\text{g}/\text{dL}$ , further substantiates the policy decision to establish an ambient lead concentration limit of 0.100  $\mu\text{g}/\text{m}^3$ . EPA's 2014 Policy Assessment states that, "The CDC decision, while emphasizing the critical importance of primary prevention of lead exposure, provides no new guidelines or criteria with regard to the significance of specific IQ decrements..." (EPA, 2014). However, the Academy of Pediatrics cautioned against focusing solely on IQ loss or gain stating, "There are ramifications of lead exposure on other endpoints that have societal and individual implications of great importance." In addition, CASAC member Dr. Susan Korrick, stated that, "the discussion of health policy judgments needs to be carefully considered in light of the fundamental and far reaching public health value of childhood cognitive and neurobehaviorial health." (CASAC, 2013).

EPA's Children's Health Protection Advisory Committee<sup>2</sup> (CHPAC), is a body of external researchers, academicians, health care providers, environmentalists, state and tribal government employees, and members of the public who advise EPA on regulations, research, and communications related to children's health. CHPAC stated in a letter to USEPA Administrator McCarthy that "lead affects children's IQs at exposure levels appreciably lower than recognized..." (CHPAC, 2015). In addition, in a letter to the Administrator on June 16, 2008

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<sup>2</sup> The legal authority for CHPAC is the Federal Advisory Committee Act (FACA), 5 USC App 2. CHPAC acts in the public interest and supports EPA in performing its duties and responsibilities under Executive Order 13045 of April 21, 1997 (62 Fed Reg 19885; April 23, 1997). CHPAC provides advice on topics such as air and water pollution regulations, chemical safety programs, risk assessment policies, and research, which reflect the wide ranging environmental issues which affect the health of children.

regarding the Proposed Rulemaking for the National Ambient Air Quality Standards for Lead, CHPAC stated there is clear scientific evidence to support an ambient lead concentration of  $0.100 \mu\text{g}/\text{m}^3$ . The letter specifically referenced the special relevance of such a standard to children because there is a steeper dose-response curve for children's neurological effects at lower levels of exposure. This is due to the fact that a higher ratio of lead air-to-blood lead ratios has been observed in children at lower air lead concentrations. (CHPAC, 2008b).

### Summary Conclusion

An ambient lead concentration limit of  $0.100 \mu\text{g}/\text{m}^3$  will be more health protective for communities that live around lead-acid battery recycling facilities, particularly younger children. There is substantial scientific justification provided through EPA's development of the 2008 Lead NAAQS and the 2015 Proposed Rule to Retain the Current Lead NAAQS evidence-based framework to support the policy decision to establish an ambient limit of  $0.100 \mu\text{g}/\text{m}^3$ . The above discussion provides a description of EPA's evidence-based framework to establish the 2008 Lead NAAQS of  $0.15 \mu\text{g}/\text{m}^3$  and key policy judgments made regarding the level of health protection and margin of safety for the national standard. As previously stated, there are currently no commonly accepted guidelines or criteria within the public health community that would provide a clear basis for reaching a judgment as to the appropriate degree of public health protection that should be afforded to protect against risk of neurocognitive effects in sensitive populations, such as IQ loss in children." (73 FR 67004). As a regional air agency, developing a source-specific-rule for lead-acid battery recycling facilities, the SCAQMD staff is recommending policy decisions that are more health protective for communities, particularly young children, that are affected by lead emissions from lead-acid battery recycling facilities regulated under Rule 1420.1. The above discussion substantiates the policy decision to establish an ambient lead concentration limit of  $0.100 \mu\text{g}/\text{m}^3$ , with some key points of the above discussion highlighted below:

- No safe blood level of lead in children has been identified (CDC, 2012a)
- The developing nervous system in children is among the sensitive-- if not the most sensitive-endpoints. (73 FR 66976)
- Lead affects children's IQs at exposure levels appreciably lower than recognized. (CHPAC, 2105)
- Pre-school children or children under five years old are the most vulnerable to exposure and adverse health effects, and thereby represent the greatest at-risk population. (EPA, 2013)
- Younger children absorb substantially more lead than adults, especially children below 2 years of age. (OEHHA, 2009)
- No study has determined a level of lead in blood that does not impair child cognition. Further, the effects are long-lasting. Damage to a child's developing brain from lead is not reversible. (AAP, 2008)
- CASAC commented that "a population loss of 1–2 IQ points is highly significant from a public health perspective." (EPA, 2008)
- Air-to-blood ratio of 1:10 is also supported by EPA's evidence based air-related IQ loss data and is even more health protective (CHPAC, 2008b)

Based on all the foregoing, the evidence supports the District's policy decision to establish a final lead limit in ambient air at  $0.100 \mu\text{g}/\text{m}^3$ .

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# ATTACHMENT H

## SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

### Final Subsequent Environmental Assessment for:

### Proposed Amended Rule 1420.1 Emissions Standard for Lead and Other Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities

August 2015

SCAQMD No. 150721CC  
SCH No. 2015011039

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## PREFACE

This document constitutes the Final Subsequent Environmental Assessment (SEA) for Proposed Amended Rule (PAR) 1420.1 – Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities. This SEA is subsequent to PAR 1420.1 Final EA –January 2014. The Draft SEA was released for a 30-day public review and comment period from July 22, 2015 to August 20, 2015. No comment letters were received from the public relative to the environmental analysis in the Draft SEA.

Subsequent to the release of the Draft SEA, minor additions and modifications were made to this SEA for clarification purposes. To facilitate identifying the modifications in the document, changes are included as underlined text and text removed from the document are indicated by ~~striketrough~~. None of the modifications alter any conclusions reached in the Draft SEA. As a result, these minor revisions do not require recirculation of the document pursuant to CEQA Guidelines §15073.5. Therefore, this document now constitutes the Final SEA for PAR 1420.1.

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# **CHAPTER 1**

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## **PROJECT DESCRIPTION**

**Introduction**

**California Environmental Quality Act**

**Project Location**

**Project Objectives**

**Project Background**

**Project Description**

**Emission Control Technologies**

## **INTRODUCTION**

Rule 1420.1 – Emission Standards for Lead from Lead-Acid Battery Recycling Facilities was adopted on November 5, 2010 and applies to large lead-acid battery recycling facilities that process more than 50,000 tons of lead a year. Rule 1420.1 was amended on January 10, 2014 to reduce other toxic (i.e. arsenic, benzene, and 1,3-butadiene) emissions from affected facilities. It was amended again on March 7, 2014, to include a multi-metals demonstration program to continuously monitor lead, arsenic, and other metals and clarify language that requires affected facilities to reimburse the South Coast Management District (SCAQMD or District) for funds spent to deploy independent third-party contractors who conduct investigations of unplanned shutdowns according to Rule 1420.1. The amendment renamed the rule as Rule 1420.1 - Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities, to reflect these changes. The March 2015 amendment lowered the ambient lead concentration limit and point source lead emission rate, as well as adding other housekeeping and maintenance measures. The purpose of Rule 1420.1 is to protect public health by reducing exposure to emissions of lead, arsenic, benzene, and 1,3 butadiene from these facilities and to help ensure attainment of the National Ambient Air Quality Standard for lead.

SCAQMD staff is currently proposing amendments to Rule 1420.1 to further reduce lead emissions at large lead acid battery recycling facilities to continue to protect public health. Proposed Amended Rule (PAR) 1420.1 lowers the point source limit to reduce the amount of lead emitted into the air from point sources; thereby reducing the further accumulation of lead dust in and around the facility to better ensure protection of public health.

## **CALIFORNIA ENVIRONMENTAL QUALITY ACT**

Amending Rule 1420.1 is a discretionary action, which has the potential to result in direct or indirect changes to the environment and, therefore, is considered a “project” as defined by the California Environmental Quality Act (CEQA). SCAQMD is the lead agency for the proposed project and has prepared this ~~Draft~~ Final Subsequent Environmental Assessment (SEA) pursuant to its Certified Regulatory Program (CEQA Guidelines § 15251). California Public Resources Code §21080.5 allows public agencies with regulatory programs to prepare a plan or other written document in lieu of an environmental impact report or negative declaration once the Secretary of the Resources Agency has certified the regulatory program. SCAQMD's regulatory program was certified by the Secretary of the Resources Agency on March 1, 1989, and is codified as SCAQMD Rule 110.

CEQA and SCAQMD Rule 110 require that potential adverse environmental impacts of proposed projects be evaluated and that feasible methods to reduce or avoid significant adverse environmental impacts of these projects be identified. To fulfill the purpose and intent of CEQA, this ~~Draft~~ Final SEA addresses the potential adverse environmental impacts associated with the proposed project according to CEQA Guidelines § 15252. It states that the lead agency has an obligation to identify and evaluate the environmental effects of the project. The Draft SEA is an informational document intended to: (a) provide the lead agency, responsible agencies, decision makers and the general public with information on the environmental effects of the proposed project; and, (b) identify possible ways to minimize the significant effects.

A Subsequent EA is the appropriate CEQA document for the proposed project because there are subsequent changes proposed to Rule 1420.1 (CEQA Guidelines §15162). The proposed project is a

modification of an earlier project and this analysis considers only the incremental effects of the proposed project.

The California Environmental Quality Act (CEQA) Guidelines Sections 15162 through 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously adopted EIR or Negative Declaration covering the project for which a subsequent discretionary action is required. The SCAQMD prepared this SEA to the previously adopted EA. This SEA is governed by Section 15162 (a) of the CEQA Guidelines, which provides that where a negative declaration has been adopted for a project, “no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- 1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- 2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- 3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
  - a) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
  - b) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
  - d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.”

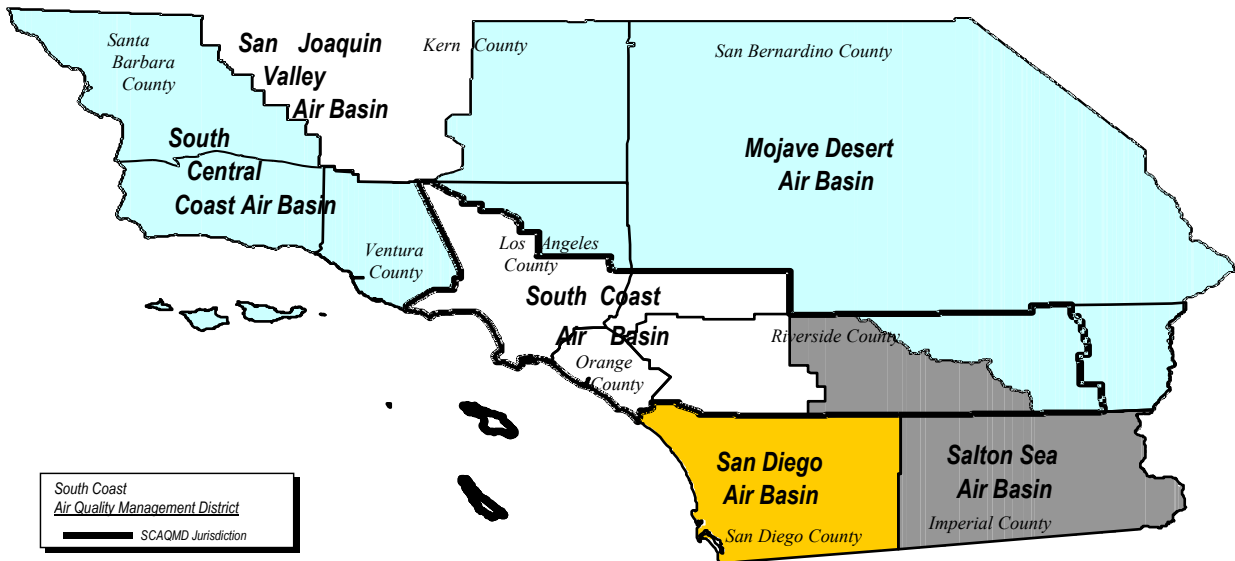
Section 15162(b) provides that if a subsequent EIR is not required under 15162 (a), then “the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.”

SCAQMD’s review of the proposed project shows that the proposed project is not expected to generate significant adverse affects on the environment. Pursuant to CEQA Guidelines §§ 15126.4 (a)(3), and 15126.6, mitigation measures and alternatives are not required for effects which are not found to be significant, thus, no mitigation measures or alternatives to the project are included in

the ~~draft~~ Final SEA. In addition, because SCAQMD has a certified regulatory program, the Environmental Assessment is an appropriate substitute for an EIR or Negative Declaration. Pursuant to CEQA Guidelines § 15252(a)(2)(B) and supported by the environmental checklist (in Chapter 2), if the project would not have any significant or potentially significant effect on the environment, “no alternatives or mitigation measures are proposed to avoid or reduce any significant effects on the environment.” ~~Comments received on the Draft SEA during the 30-day public review period will be addressed and included in the Final SEA.~~ The Draft SEA was released for a 30-day public review and comment period from July 22, 2015 to August 20, 2015. No comment letters were received on the Draft SEA during the comment period.

**PROJECT LOCATION**

The SCAQMD has jurisdiction over an area of 10,473 square miles, consisting of the four-county South Coast Air Basin (Basin) and the Riverside County portions of the Salton Sea Air Basin (SSAB) and the Mojave Desert Air Basin (MDAB). The Basin, which is a subarea of the SCAQMD’s jurisdiction, is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The 6,745 square-mile Basin includes all of Orange County and the nondesert portions of Los Angeles, Riverside, and San Bernardino counties. The Riverside County portion of the SSAB and MDAB is bounded by the San Jacinto Mountains in the west and spans eastward up to the Palo Verde Valley (see Figure 1-1).



**Figure 1-1 Boundaries of the South Coast Air Quality Management District**

## **PROJECT OBJECTIVES**

The objectives of PAR 1420.1 are to protect public health by further reducing lead emissions from large lead-acid battery recycling facilities by:

- Reducing the total facility point source emission limit for lead; and
- Clarifying applicability for large lead-acid battery recycling facilities that are closing and closure requirements.

## **PROJECT BACKGROUND**

### **Health Effects of Lead**

Lead is classified as a “criteria pollutant” under the federal Clean Air Act. It is also identified as a carcinogenic toxic air contaminant (TAC) by the Office of Environmental Health Hazard Assessment (OEHHA). Chronic health effects include problems such as nervous and reproductive system disorders, neurological and respiratory damage, cognitive and behavioral changes, and hypertension. Also, exposure to lead may increase the risk of contracting cancer or result in other adverse health effects. Young children are especially susceptible to the effects of environmental lead given that their bodies accumulate lead more readily than do adults and because they are more vulnerable to certain biological effects of lead including learning disabilities, behavioral problems, and deficits in IQ.

During the U.S. EPA’s recent review of the lead NAAQS the U.S. EPA Administrator concluded that the current lead NAAQS of  $0.15 \mu\text{g}/\text{m}^3$  should be retained given that it provides requisite protection of public health. However, the Administrator noted that a threshold blood-lead level with which nervous system effects, and specifically, cognitive effects, occur in young children cannot be discerned from the currently available studies. Further, in the U.S. EPA’s recent Policy Assessment for the Review of the Lead NAAQS, the U.S. EPA explicitly stated “with regard to our understanding of the relationship between exposure or blood lead levels in young children and neurocognitive effects, the evidence in this review...does not establish a threshold blood lead level for neurocognitive effects in young children. Furthermore, based on information provided in the U.S. EPA’s recent policy assessment document and proposed rule, an ambient lead concentration of  $0.15 \mu\text{g}/\text{m}^3$  correlates to a potential IQ decrement of approximately (2) points in young children exposed to elevated levels of lead.

### **Regulatory History**

Lead-acid battery recyclers have been subject to environmental air quality regulations for more than two decades. Below is a chronology of regulatory activities:

- In November 1970, CARB set the state ambient air quality standard for lead at 1.5 microgram per cubic meter averaged over 30 days.
- In October 1978, the U.S. EPA adopted the National Ambient Air Quality Standards (NAAQS) for lead requiring attainment with a lead ambient concentration of 1.5 microgram per cubic meter averaged over a calendar quarter.
- In September 1992, the SCAQMD adopted Rule 1420 – Emissions Standard for Lead. The rule incorporated the state ambient air quality standard and required control devices on lead emission points, control efficiency requirements for lead control devices, housekeeping, and monitoring or modeling of ambient air quality.
- In October 1992, OEHHA classified lead as a carcinogenic toxic air contaminant and assigned to it a cancer potency factor and a cancer unit risk factor.

- June 1997, the U.S. EPA adopted the National Emissions Standards for Hazardous Air Pollutants (NESHAP) from Secondary Lead Smelting. The federal regulation required lead emission concentration limits of lead control devices, control of process fugitive emissions, monitoring, recordkeeping, and reporting.
- On July 16, 2007, EPA finalized a regulation that affects lead emissions from all lead-acid battery manufacturing facilities that are area sources. The federal regulation required lead emission concentration limits, testing, monitoring, recordkeeping, and reporting requirements.
- On October 15, 2008, the U.S. EPA signed into regulation an amended NAAQS for lead of  $0.15 \mu\text{g}/\text{m}^3$ .
- November 5, 2010, the SCAQMD adopted Rule 1420.1 – Emissions Standard for Lead from Large Lead-acid Battery Recycling Facilities. The rule established requirements for total enclosures of areas used in the lead-acid battery recycling operation, ambient air lead concentration limits, ambient air monitoring, and housekeeping practices. Additional rule amendments followed the initial adoption in January of 2014, March of 2014, and March of 2015.
- December 14, 2010, the U.S. EPA made final revisions to the ambient monitoring requirements for measuring lead in the air. These amendments expand the nation's lead monitoring network to better assess compliance with the 2008 National Ambient Air Quality Standards for lead.
- January 2, 2015, the U.S. EPA proposed that the ambient lead concentration standard of  $0.15 \mu\text{g}/\text{m}^3$  averaged over a rolling 3-month period remain unchanged. The 90-day comment period for this proposal ended on April 6, 2015 and requires further action by the U.S. EPA.

The following provides additional background information about Rule 1420 and the 2008 NAAQS for lead.

### **Rule 1420**

Rule 1420 was adopted in September 1992 and has not been amended since its adoption. Rule 1420 applies to facilities that process or use lead-containing materials that include, but is not limited to, primary or secondary lead smelters, foundries, lead-acid battery manufacturers or recyclers, and lead-oxide, brass and bronze producers. Rule 1420 is based on the current state ambient air quality standard of  $1.5 \mu\text{g}/\text{m}^3$  averaged over a 30-day period. The rule includes requirements for point source controls, monitoring, sampling, recordkeeping, and reporting. Rule 1420 requires facilities that process more than two tons of lead per year to submit a Compliance Plan that provides information on how the facility will conduct monitoring, air dispersion modeling, and implement requirements to install and implement point source controls.

### **2008 NAAQS for Lead**

Since U.S. EPA established the initial standard of  $1.5 \mu\text{g}/\text{m}^3$  in 1978, scientific evidence about lead and health has expanded dramatically. More than 6,000 new studies on lead health effects, environmental effects, and lead in the air have been published since 1990. Evidence from health studies shows that adverse effects occur at much lower levels of lead in the blood than previously thought. As a result, U.S. EPA amended the NAAQS for lead that now reduces the ambient air quality standard from  $1.5 \mu\text{g}/\text{m}^3$  to  $0.15 \mu\text{g}/\text{m}^3$ . The 2008 lead NAAQS requires full attainment by each state no later than five years after final designations for attainment status are made. Demonstration of attainment is based on measurements using a rolling 3-month averaging form to

be evaluated over a 3-year period. Measurements are to be determined by U.S. EPA-required monitoring networks within each state which consist of both source-oriented and non-source-oriented monitors. The SCAQMD has already established the required monitoring network for both source and non-source-oriented lead monitors.

Further, in May of 2014, the U.S. EPA released its “Policy Assessment for the Review of the Lead National Ambient Air Quality Standards,” reaffirming the primary (health-based) and secondary (welfare-based) staff conclusions regarding whether to retain or revise the current standards. As a result, in January of 2015 the U.S. EPA proposed that the ambient lead concentration standard of  $0.15 \mu\text{g}/\text{m}^3$  averaged over a rolling 3-month period remain unchanged. The 90-day comment period for this proposal ended on April 6, 2015 and requires further action by the U.S. EPA.

The SCAQMD Governing Board has authority to adopt PAR 1420.1 pursuant to the California Health and Safety Code Sections 39002, 39650 et. seq., 40000, 40001, 40440, 40441, 40702, 40725 through 40728, 41508, 41700 and 41706.

### **Compliance Determination-Monitoring**

The demonstration of attainment of the lead standard is to be based on measurements using a rolling 90 day averaging form to be evaluated over a three-year period. Measurements are to be determined by EPA-required monitoring networks within each state which consist of both source-oriented and non-source-oriented monitors. The SCAQMD has already established the required monitoring network for both source and non-source-oriented lead monitors. Since 2012, the District has not exceeded the federal lead standard.

Ambient air lead concentrations are determined through use of high-volume total suspended particulate samplers placed throughout the South Coast Air Basin and at both upwind and downwind locations of the facilities where maximum ambient concentrations are expected. They measure lead and arsenic concentrations in the ambient air over a midnight-to-midnight, 24 hour period.

Point source emission rates are determined by source tests to demonstrate compliance with the mass emission standards specified in the rule. They are “snapshots” of the efficiency of the control equipment and are conducted when the equipment is installed and annually or biannually thereafter. The tests are conducted in accordance with SCAQMD, CARB or EPA test methods.

### **Affected Facilities**

PAR 1420.1 applies to large lead-acid battery recycling facilities that process more than 50,000 tons of lead annually. Currently there are only two facilities subject to Rule 1420.1 in the SCAQMD: Exide Technologies and Quemetco Inc. Exide Technologies is located in Vernon (Los Angeles County) and Quemetco, Inc. is located in the City of Industry (Los Angeles County).

As discussed further below, Exide is in the process of permanently closing their facility. As a result, the point source limit of PAR 1420.1 will only be applicable to Quemetco because Exide is no longer in operation. In addition, although the closure provisions will be applicable to both facilities, they are immediately applicable to Exide and will be analyzed in that context. It is assumed that the closure analysis for Quemetco would be similar.



### **Closure of Exide Technologies In Vernon, CA**

On April 7, 2015 Exide Technologies withdrew their California Department of Toxic Substance Control (DTSC) permit application and provided notification of its intent to permanently close. On May 15, 2015, Exide Technologies submitted a revised Closure Plan to DTSC. The Closure Plan provides a detailed status of the facility and contains decontamination and demolition plans. The Closure Plan also includes groundwater monitoring information, engineering controls, waste characterization, and air monitoring plans. The Closure Plan is separate from, but is occurring simultaneously with, the DTSC Corrective Action imposed on Exide. The Corrective Action requires off-site cleanup of nearby residential and industrial areas, as well as cleanup of on-site contaminated groundwater.

Based on the Closure Plan submitted to DTSC, Exide's closure is expected to occur in three phases. The first phase will involve the removal of inventory, equipment decontamination and removal, decontamination and deconstruction of buildings, and soil sampling. Exide expects to implement dust mitigation measures and will retain a third-party environmental consultant to monitor and document implementation of those measures and to conduct real-time air monitoring. Exide plans to continue operating emission air pollution control equipment to maintain negative pressure on associated buildings while the inventory is removed and gross cleaning of duct work is complete. Once the duct work has been removed up to the emission control equipment, the ducts shall be blinded and the interior of the equipment cleaned following manufacturer's operating procedures. For internal, decontamination of structures, it will be done under negative pressure by vacuum cleaning vented to HEPA filters and then pressure washing. The Closure Plan requires that any decontamination of the exteriors of structures must occur within a temporary enclosure (e.g., scaffolding enclosed with plastic) with negative pressure. The most recent revision of the Closure Plan does not require that roofs have temporary enclosures while they are decontaminated and deconstructed. SCAQMD staff commented on this Closure Plan requesting that this provision be included in the Final Closure Plan. This ~~Draft~~ Final SEA evaluates the construction of a temporary enclosure above the facility roofs during external decontamination as part of this project in the event that the Final Closure Plan does not include this requested provision.

Phase 2 will address potential below-grade decontamination. These additional activities may require the removal of contaminated soil beneath the concrete floor at the closure areas; capping and installation of boundary markers where contaminated soils are left in place; and development of a deed notice/land use covenant. The scope of Phase 2 will be determined using data generated during Phase 1 and may be influenced by data generated during the Corrective Action. Generally areas will be excavated to a depth of five feet in and around structures. Dust control measures such as temporary enclosures and water will be used during floor removal and excavation activities. The temporary enclosure will remain in-place and/or the area will be covered until the excavation is complete.

When Phase 1 and Phase 2 are completed, the facility will submit certification by both the facility and an independent, qualified engineer registered in the State of California within 60 days of the completion of final closure, to DTSC, SCAQMD and the City of Vernon. This certification will state that the facility has been closed in accordance with the approved closure plan. Phase I of the closure is expected to commence March 2016 and be completed by May 2018. Phase II is scheduled for completion by June 2020.

Phase III (ongoing) would include post-closure and contingent post-closure work to implement long-term inspections, monitoring, and maintenance. Phase III is scheduled to last until 2049.

**Ambient Air Monitoring**

The affected facilities have several air monitors throughout their sites. These monitors are used to determine compliance with the ambient concentration limits. They measure lead and arsenic concentrations in the ambient air over a midnight-to-midnight, 24 hour period. See Figure 1-2 and for Figure 1-3 Exide and Quemetco’s Ambient Monitoring Locations, respectively.

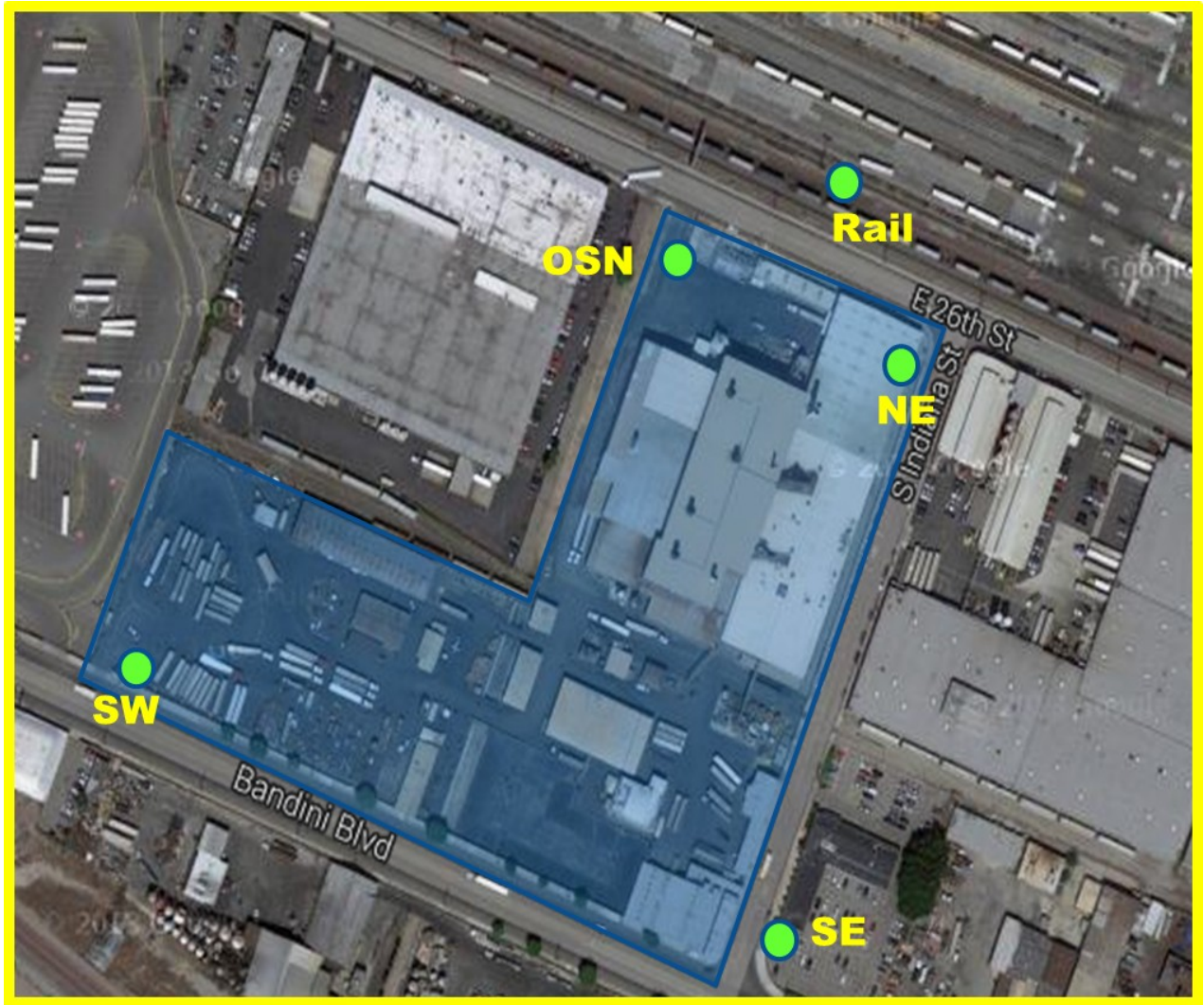


Figure 1-2 Exide’s Ambient Monitoring Stations

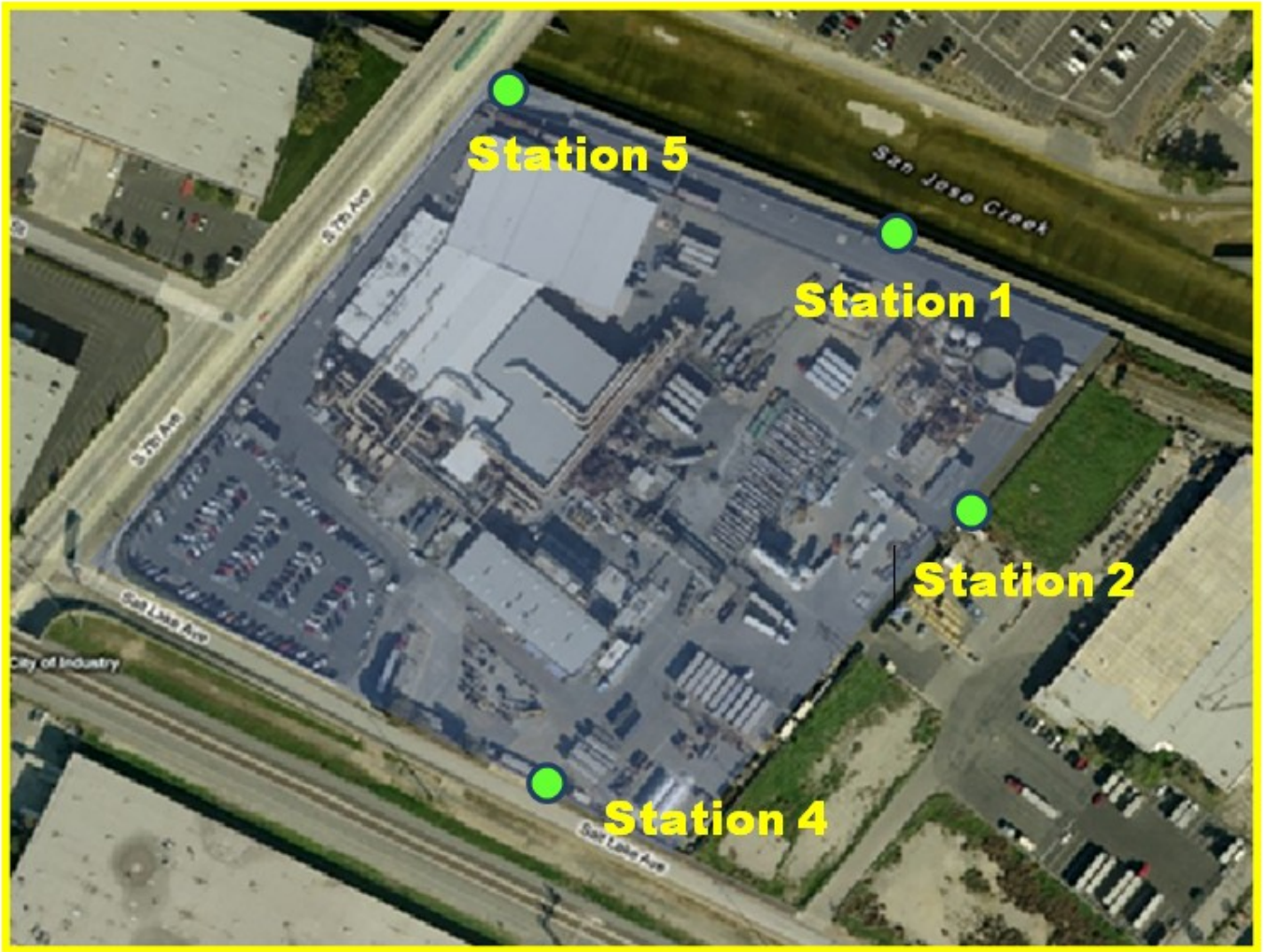


Figure 1-3 Quemetco's Ambient Monitoring Stations

### Overview of Existing Operations

Lead-acid battery recycling facilities are secondary lead smelting operations where spent lead-acid batteries, mostly automotive, and other lead-bearing materials are received from various sources and processed to recover lead, plastics, and acids. The process mainly involves the sorting, melting, and refining of lead-acid batteries, which ultimately produces lead ingots that are then made into new batteries or sold to other entities. Figure 1-4 is a Simplified Flow Diagram of the Process. Below is a general description of the lead recycling process at the affected facilities including potential lead emission points:

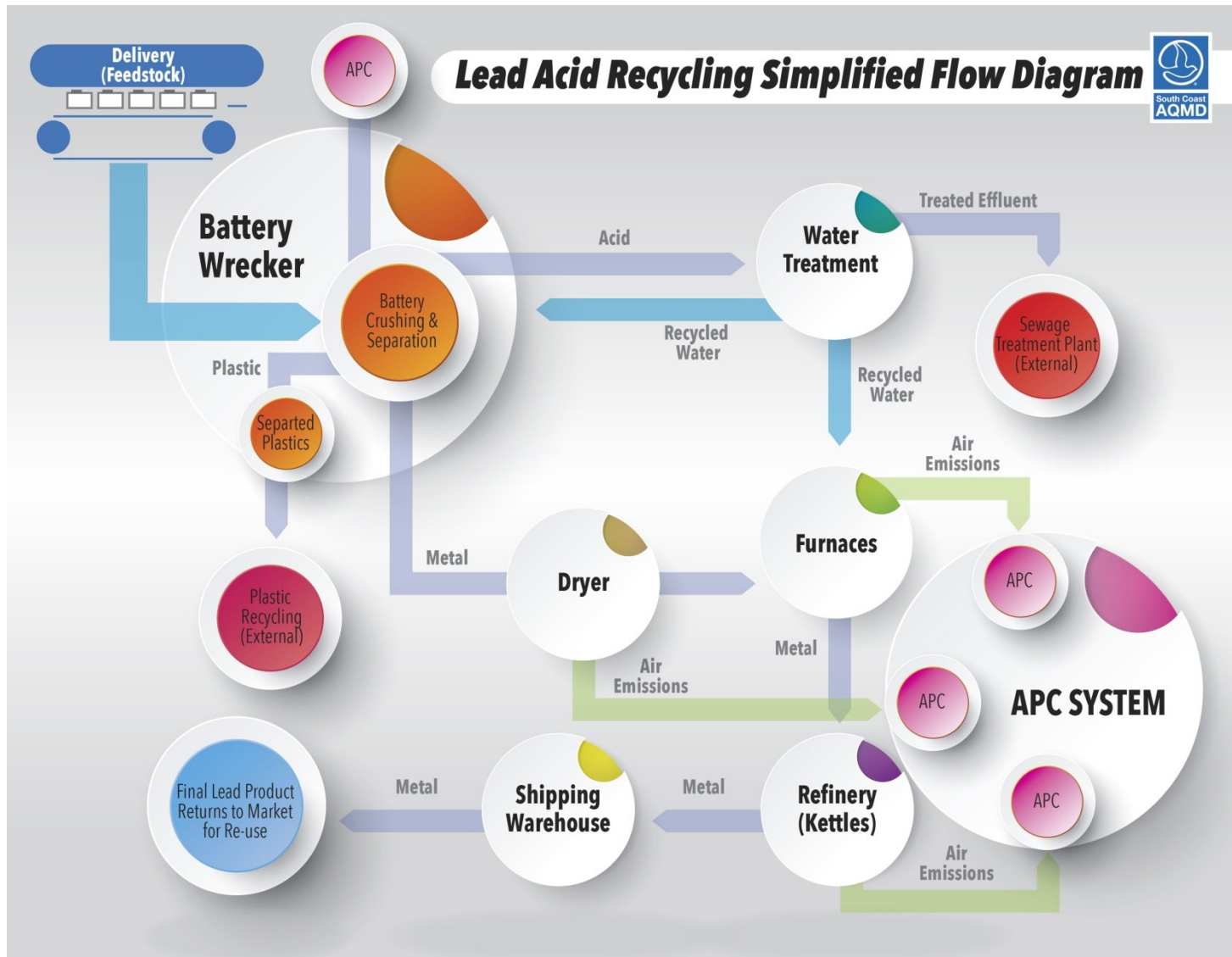


Figure 1-4-Lead Acid Recycling Simplified Flow Diagram

**Phase I – Raw Materials Processing:** Lead-bearing materials recovered from lead-acid batteries are prepared and processed prior to being charged (loaded) to a smelting furnace. The feedstock for lead-acid battery recycling facilities can fluctuate. Although the majority of the feedstock is plastic-cased car batteries, other lead-bearing items are also sometimes processed (e.g., steel-cased batteries).

**Receiving and Storage:** Spent lead-acid batteries are usually received on pallets that are either stored or sent directly to conveyors for immediate crushing.

**Battery Breaking/Crushing:** The spent lead-acid batteries are unloaded from conveyors and loaded into a hammer mill system where they are crushed whole. Both Quemetco and Exide's battery breaking areas are located in a total enclosure that is vented to an emission collection system pursuant to Rule 1420.1. The crushed material is then placed into a series of tanks filled with water in order to filter out any plastic and rubber components of the battery casing and to clean materials of the acids. Through buoyancy effects, the crushed metal material sinks to the bottom of the tanks and goes through a series of screens to further isolate lead-bearing materials. Arsenic and other metals can be found in the lead-bearing materials due to battery parts such as the posts and grids containing alloys of arsenic and lead. The materials are then typically stored in open or partially covered piles if not required for immediate charge preparation.

**Charge Preparation/Rotary Drying/Sweating:** Recovered lead-bearing materials are prepared by blending it with stored lead scrap and reagents prior to being charged to a furnace. The metallic scrap materials are placed in dryers to remove moisture prior to charging to a furnace in order to reduce furnace upsets (puffs and explosions). Some unfiltered plastic and rubber components of the battery casing may be inadvertently introduced into the dryer during this process. The materials are then sweated (subjected to temperatures above the melting temperature of lead, but below that of the other metals) to separate lead from other metals with higher melting points. The process of melting of plastic and rubber parts from the partial combustion of carbon coke (mainly in the dryers) generates toxic organic emissions.

**Phase II – Smelting:** Smelting is the production of crude lead by melting and separating the lead from metallic and non-metallic contaminants and by reducing lead compounds to elemental lead. Smelting is carried out in the blast, electric resistance, reverberatory, and rotary kiln furnaces. These furnaces emit high levels of metal particulates during the charging and tapping processes in addition to toxic organic emissions.

**Cupola (Blast) furnaces:** Typically, "hard" lead, or antimonial lead (containing approximately 10 percent antimony) is produced in blast furnaces. Scrap metal, re-run slag, scrap iron, coke, recycled dross, flue dust (which contain lead and arsenic), and limestone are used as charge materials to the furnace. Process heat is produced by the reaction of the charged coke with blast air that is blown into the furnace. Currently, Exide utilizes a blast furnace, which generates benzene and 1,3-butadiene emissions.

**Electric resistance furnaces:** Electric resistance furnaces generate heat from molten slag that offers resistance to the passage of a current through it. Electric energy is converted into heat when a current flows through electrodes directly into the furnace charge (i.e., the material to be heated). Electric resistance furnaces typically generate less airborne emissions (lead and arsenic) compared to blast or reverberatory furnaces, which utilize combustion processes to generate the

heat necessary to melt the furnace charge materials. Currently, Quemetco is the only lead-acid battery recycler in the SCAQMD utilizing an electric resistance furnace. Quemetco's electric resistance furnace is typically used to further separate lead-containing materials from non lead-containing materials contained in the lead slag produced from the reverberatory furnace.

**Reverberatory furnaces:** Semi-soft lead (containing approximately three to four percent antimony) is produced in reverberatory furnaces, which generate lead and arsenic emissions. Lead scrap, metallic battery parts, oxides, dross, and other residues are used as charge materials to the furnace. The charge materials are heated directly using natural gas, which generate benzene and 1,3-butadiene emissions. Reverberatory furnaces are used by both Exide and Quemetco.

**Phase III – Refining and Casting:** Refining and casting the crude lead from the smelting process can consist of softening, alloying, and oxidation, depending on the degree of purity or alloy type desired. Crude lead produced during smelting operations is remelted and refined by the addition of reagents, such as sulfur and caustic soda. The purified lead is then cast into molds or ingots. Refining furnaces and kettles are typically gas or oil-fired and maintained at operating temperatures between 600 to 1,300 degrees Fahrenheit. Arsenic fumes may be emitted when molten lead is transferred to refining kettles and lead particulates may become airborne off refining kettle contents due to thermal rise processes.

**Alloying furnaces:** Alloying furnaces are kettle furnaces used to simply melt and mix ingots of lead and alloy materials, such as antimony, tin, arsenic, copper, and nickel. Other reagents used include sodium hydroxide, sodium nitrate, carbon coke, calcium metal, sodium metal, and phosphates.

**Refining furnaces:** Refining furnaces are used to either remove copper and antimony for soft lead production, or to remove arsenic, copper, and nickel for hard lead production. Sulfur may be added to the molten lead to remove copper. The resultant copper sulfide is skimmed off as dross and may be processed in a blast furnace to recover residual lead. Aluminum chloride is used to remove copper, antimony, and nickel.

**Oxidizing furnaces:** Either kettle or reverberatory units are used to oxidize lead and to entrain the product lead oxides in the combustion air stream for subsequent recovery in high-efficiency baghouses.

## **PROJECT DESCRIPTION**

The following is a summary of the proposed amendments to PAR 1420.1 – Emission Standards for Lead and Other Toxic Air Contaminants from Lead-Acid Battery Recycling Facilities. A copy of PAR 1420.1 with the specific details of the amendments can be found in Appendix A. Both the following and Appendix A constitute a project description.

### **Subdivision (a) – Purpose**

No change.

### **Subdivision (b) – Applicability**

The proposed rule will clarify that applicability covers lead-acid battery recycling facilities during closure activities. PAR1420.1 applies until the proposed closure requirements in paragraph (p)(4) are satisfied. Continued compliance with the rule is necessary to ensure that attainment with the lead NAAQS will be maintained and that surrounding communities suffer no degradation in air quality during closure, including demolition, cleanup and decontamination activities.

### **Subdivision (c) – Definitions**

No change.

### **Subdivision (d) – General Requirements**

No change.

### **Subdivision (e) – Total Enclosures**

No change.

### **Subdivision (f) –Point Source Emissions Controls**

Effective September 4, 2015, the total facility mass lead emissions from all sources will be reduced from 0.023 pounds per hour to 0.003 pounds per hour.

### **Subdivision (g) – Compliance Plan**

No change.

### **Subdivision (h) – Housekeeping Requirements**

No change.

### **Subdivision (i) – Maintenance Activity**

No change.

### **Subdivision (j) –Ambient Air Monitoring Sampling Requirements**

No change.

### **Subdivision (k) – Source Tests**

PAR 1420.1 will eliminate the biennial source test option for facilities that demonstrate a lead point source emission rate of 0.0012 lb/hr or less. The proposed rule will require annual source testing for point sources that emit lead.

**Subdivision (l) – New Facilities**

No change.

**Subdivision (m) – Recordkeeping**

No change.

**Subdivision (n) – Reporting**

No change.

**Subdivision (o) – Curtailment Requirements**

Effective upon adoption of PAR 1420.1, the first tier of the total facility mass emission rate for process curtailments in Table 2 of subparagraph (o)(2) will be reduced to coincide with the proposed reduction of total facility lead point sources emission rate under subparagraph (f)(1)(A) from 0.023 lb/hour to 0.003 lb/hour.

**Subdivision (p) – Large Lead-Acid Battery Facility Closure Requirements**

PAR 1420.1 includes provisions for lead-acid battery recycling facility owner and operators to ensure no degradation to air quality occurs during facility closure activities such as demolition, decontamination, and cleanup. Facility closure entails permanently stopping production and notifying the Execution Officer in writing that the facility will no longer be in operation.

In the proposal, facilities that are closing will be required to submit a Compliance Plan for Closure Activities and continue conducting daily lead and arsenic ambient monitoring (paragraphs (d)(1), (d)(5) and (d)(6)). The Compliance Plan for Closure Activities would be submitted in advance of decontamination and demolition actions taking place. It would specify the housekeeping and maintenance measures to be taken to prevent lead or arsenic ambient exceedances. The facility can tailor the plan to address specific decontamination or demolition procedures. For example, the plan could include building washing provisions while the building remains intact but discontinuing building washing provisions once the buildings have been demolished. The plan is expected to be updated as closing activities proceed to provide added flexibility. The plan would also require that contingency provisions be included that can be implemented in the event there is an exceedance of the lead or arsenic ambient concentrations. These contingency plans would likely be additional housekeeping and maintenance measures such as increased frequency of washing, sweeping and vacuuming as well as specific measures for demolition-related emissions.

If the lead or arsenic ambient concentrations exceed rule requirements, all closure related activities that contributed to the exceedance shall be suspended until contingency measures in the Approved Compliance Plan for Closure Activities can be implemented. If the exceedance is due to a previously unidentified activity for which the contingency measures do not address, then a revised Compliance Plan for Closure Activities will be required to be submitted and approved by the Executive Officer before closure related activities that contributed to the exceedances resume. While the revised plan is not intended to be as comprehensive as Compliance Plan for Closure Activities, it is necessary to address the cause of the exceedances prior to resuming to ensure that attainment with the lead NAAQS will be maintained and that surrounding communities suffer no degradation in air quality.



Facilities will be required to continue monitoring and abiding by the Compliance Plan for Closure Activities until the lead-acid battery recycling facility has surrendered all air permits to the Executive Officer, submitted DTSC-approved certification of final closure to SCAQMD, receives written confirmation from the Executive Officer that final closure has been verified and there are no exceedances of ambient lead or arsenic concentrations for 12 consecutive months, with at least one month occurring on or after the date of submittal of certification of final closure.

**Subdivision (q) – Exemption**

An exemption has been included in PAR 1420.1 to specify which provisions of the rule do not apply to a facility that has permanently ceased production and notified the Executive Officer in writing that the facility is permanently closing. If the facility has ceased production, point source emission rate limits, operational Compliance Plans, source testing and curtailment requirements are no longer necessary.

**Subdivision (r) – Severability**

No change.

**Appendix 1 – Content of Initial Facility Status Reports**

No change.

**Appendix 2 – Content of Ongoing Facility Status Reports**

No change.

**Appendix 3 – Continuous Furnace Pressure Monitoring (CFPM) Plan**

No change.

## **EMISSIONS CONTROL TECHNOLOGIES**

### **Existing Controls**

The impacted facilities are secondary lead smelting operations where spent automotive and other lead-bearing materials are processed to recover lead, plastics and acids. The process generally involves the sorting, smelting and refining of raw materials for the purpose of producing lead ingots. Lead, arsenic and other toxic or criteria pollutant emissions are vented directly to air pollution control equipment, captured in building enclosures and then vented to air pollution control equipment or are fugitive emissions that do not get captured by air pollution control equipment and come into contact with ambient air.

Quemetco uses baghouses or filter systems to control arsenic and lead emissions from process operations and building enclosures. Quemetco vents all the exhaust from particulate control to a centralized wet electrostatic precipitator (WESP). In addition, Quemetco has a regenerative thermal oxidizer (RTO) and scrubber. It is anticipated that the proposed rule will not result in any additional control devices or physical changes at Quemetco.

Exide vents particulate emissions to a variety of secondary, tertiary and even quaternary control devices. These devices include high efficiency particulate arrestors, cyclones, scrubber and thermal oxidizers. During facility closure, it is anticipated that Exide will continue to operate the negative air pressure enclosures to reduce the fugitive dust emissions from closure activities for as long as possible, at least until after all internal and external surfaces have been decontaminated and the structures themselves need to be demolished.

### **Compliance with PAR 1420.1**

With respect to the facility point source limit in PAR 1420.1, existing lead point source tests demonstrate that Quemetco is already complying with the new proposed limit (0.003 lb/hr) for lead. Exide is in the process of closing their facility and the limit will not have an impact on its operations. Therefore, no additional point source emission control strategies are anticipated at either affected facilities.

With respect to the proposed closure requirements of PAR 1420.1, fugitive emissions can accumulate in and around process areas, from point sources, raw material storage areas, on roof tops, and during maintenance operations to name a few. Both facilities currently employ a variety of housekeeping and containment strategies to minimize fugitive emissions. Based on existing Rule 1420.1 requirements and strategies used by the facilities, fugitive emissions are controlled through use of total enclosures with negative air pressure that are vented to pollution control devices, procedures for containment during maintenance activities, and a number of housekeeping provisions. During facility closure, PAR 1420.1 will require continued compliance with these housekeeping and monitoring requirements. A Compliance Plan for Facility Closure would additionally require identification of more specific measures (include housekeeping, maintenance, continued use of total enclosures and possibly other measures to minimize fugitive dust emissions) directed at specific closure activities anticipated by the facility.

### **Ambient Source Control Strategies for Lead**

#### **Fugitive Lead-Dust Control**

Fugitive lead-dust at lead-acid battery recycling facilities can be a major source of lead emissions. Fugitive lead-dust accumulates in and around process areas, from lead point sources,

on roof tops, in and around facility, and during maintenance operations to name a few. There are a variety of housekeeping and containment strategies that can be implemented to minimize fugitive lead dust. Housekeeping activities must be implemented frequently and properly to ensure they are effective. The concept behind many of these strategies is to either contain or remove lead dust so it cannot become airborne. Housekeeping practices specifying adequate frequencies and locations for all cleanings to be performed are also critical in the effectiveness to control fugitive lead-dust emissions. The following summarizes some potential fugitive lead dust control strategies:

- Paving or using chemical stabilizers or water on unpaved areas subject to vehicular and foot traffic;
- Cleaning of paved areas through vacuuming, vacuum sweepers, and use of wet suppression;
- Wet washing or vacuuming of areas such as roof tops and lead storage and disposal areas where lead particulate can accumulate;
- Cleaning (i.e. sweeping, vacuuming, dusting) areas where lead dust may accumulate due to accidents, process upsets or equipment malfunctions;
- Using enclosures or containment areas during maintenance activities or storage of lead-containing materials; and equipment;
- Using total enclosures under negative air pressure vented to point lead point source controls to ensure that lead dust that accumulates in and around process areas does not become fugitive; Using a vehicle wet washing station that removes dust and other accumulated material from the wheels, body, and vehicle underside and prevents the inadvertent transfer of lead contaminated material to public roadways. The stations are used by all vehicles traversing facility areas associated with the lead-acid battery recycling process prior to exiting the facility and onsite mobile sweepers after operation. Ground surfaces where vehicles are washed could be required to be wet washed prior to the vehicle wet washed areas becoming dry to prevent any fugitive lead-dust or residue from becoming airborne. Practices that minimize the potential for further releases of lead emission when collecting and disposing of lead contaminated water accumulated during washing processes would be required. Practices would include the minimization of the amount of water which is allowed to dry exposed to the atmosphere prior to collection for treatment.

## **CHAPTER 2**

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**Introduction**

**General Information**

**Environmental Factors Potentially Affected**

**Determination**

**Discussion and Evaluation of Environmental Checklist**

**INTRODUCTION**

The environmental checklist provides a standard evaluation tool to identify a project's adverse environmental impacts. This checklist identifies and evaluates potential adverse environmental impacts that may be created by the proposed project.

**GENERAL INFORMATION**

Project Title:	Proposed Amended Rule 1420.1
Lead Agency Name:	South Coast Air Quality Management District
Lead Agency Address:	21865 Copley Drive, Diamond Bar, CA 91765
Rule Contact Person:	Michael Morris, (909) 396-3282
CEQA Contact Person:	Cynthia Carter, (909) 396-2431
Project Sponsor's Name:	South Coast Air Quality Management District
Project Sponsor's Address:	21865 Copley Drive, Diamond Bar, CA 91765
General Plan Designation:	Not applicable
Zoning:	Not applicable
Description of Project:	PAR 1420.1 would further protect public health by reducing lead emissions produced by large lead-acid battery recycling facilities. PAR 1420.1 would accomplish this by lowering the total facility lead point source limit to 0.003 pounds per hour, clarify that the rule applies during closure, and include new provisions to ensure lead and arsenic emissions are appropriately controlled during closure and clean-up activities, and thereafter. The environmental analysis in the <del>Draft</del> <u>Final</u> SEA concluded that PAR 1420.1 would not generate any significant adverse environmental impacts. PAR 1420.1 would affect two facilities that are on lists of California Department of Toxics Substances Control hazardous waste facilities per Government Code §65962.5 ( <a href="http://www.envirostor.dtsc.ca.gov/public">http://www.envirostor.dtsc.ca.gov/public</a> ; accessed on June 17, 2015).
Surrounding Land Uses and Setting:	Large industrial/commercial facilities recycling lead-acid batteries
Other Public Agencies Whose Approval is Required:	None

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED**

The following environmental impact issues have been assessed to determine their potential to be affected by the proposed project. As indicated by the checklist on the following pages, environmental topics marked with an "✓" may be adversely affected by the proposed project. An explanation relative to the determination of the significance of the impacts can be found following the checklist for each area.

- |   |   |   |
|---|---|---|
| <input checked="" type="checkbox"/> Aesthetics  | <input type="checkbox"/> Geology and Soils                          | <input type="checkbox"/> Population and Housing           |
| <input type="checkbox"/> Agricultural Resources | <input checked="" type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Public Services                  |
| <input checked="" type="checkbox"/> Air Quality | <input checked="" type="checkbox"/> Hydrology and Water Quality     | <input type="checkbox"/> Recreation                       |
| <input type="checkbox"/> Biological Resources   | <input type="checkbox"/> Land Use and Planning                      | <input checked="" type="checkbox"/> Solid/Hazardous Waste |
| <input type="checkbox"/> Cultural Resources     | <input type="checkbox"/> Mineral Resources                          | <input type="checkbox"/> Transportation/Traffic           |
| <input checked="" type="checkbox"/> Energy      | <input checked="" type="checkbox"/> Noise                           | <input type="checkbox"/> Mandatory Findings               |

**DETERMINATION**

On the basis of this initial evaluation:

- I find the proposed project, in accordance with those findings made pursuant to CEQA Guideline §15252, COULD NOT have a significant effect on the environment, and that a SUBSEQUENT ENVIRONMENTAL ASSESSMENT with no significant impacts has been prepared.
- I find that although the proposed project could have a significant effect on the environment, there will NOT be significant effects in this case because revisions in the project have been made by or agreed to by the project proponent. A SUBSEQUENT ENVIRONMENTAL ASSESSMENT with no significant impacts will be prepared.
- I find that the proposed project MAY have a significant effect(s) on the environment, and a SUBSEQUENT ENVIRONMENTAL ASSESSMENT will be prepared.
- I find that the proposed project MAY have a "potentially significant impact" on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. A SUBSEQUENT ENVIRONMENTAL ASSESSMENT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL ASSESSMENT pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL ASSESSMENT, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

**Date:** July 21, 2015

**Signature:**



Jillian Wong, Ph.D.  
Program Supervisor, CEQA Section  
Planning, Rules, and Area Sources

## DISCUSSION AND EVALUATION OF ENVIRONMENTAL IMPACTS

The environmental impacts associated with the current requirements in Rule 1420.1 have already been analyzed in previous CEQA documents prepared for the rule. The ~~Draft~~-Final SEA analyzes all closure (and post-closure) impacts from the proposed amendments, however this is a conservative approach as some closure provisions in this rule amendment are just a clarification that current provisions apply through closure. The analysis contained herein only focuses on the environmental impacts which would result from the proposed amendments to the rule (such as the lower total facility point source limit for lead, and facility closure requirements). The objective of PAR 1420.1 is to further reduce the public's exposure to lead that is associated with lead emissions from large lead-acid recycling facilities. PAR 1420.1 is establishing more stringent requirements for these facilities. One of the key components of PAR 1420.1 is reducing the total facility lead point source limit and incorporating closure requirements (see Chapter 1- Project Description for a thorough discussion on the proposed rule requirements). Based on existing lead point source tests, Quemetco is already complying with the proposed rule's total facility point source limit (0.003 lb/hr) for lead and no further actions are necessary. Additionally, Exide is in the process of closing their facility. See Table 2-1 for details that the lower point source limit is already being met by both facilities.

**Table 2-1 Lead Point Source Test Results**

	Facility	
	Quemetco <sup>1</sup>	Exide
Lead Point Source Emission Rate (lb/hr)	0.000341	N/A <sup>2</sup>
PAR 1420.1 New Point Source Limit (lb/hr)	0.003	0.003
Compliance with New Limit?	Yes	N/A

There will be no physical changes at Quemetco. Exide will be in the process of demolishing their facility for the next few years. In order for Exide to comply with PAR 1420.1 during closure, Exide will continue their current monitoring and some housekeeping and maintenance activities, as well as maintain the total enclosures or construct temporary total enclosures on-site.

For the purpose of the CEQA analysis, reasonable worst-case assumptions have been made. With respect to the lower facility lead point source limit, Quemetco is already complying with the proposed lower total facility lead point source limit and Exide is no longer operational and is starting the closure process. Thus, no impacts are expected for either affected facilities from this provision in PAR 1420.1.

With respect to the additional closure requirements in PAR 1420.1, they will apply to both facilities. Currently, Quemetco continues to operate while Exide is in the process of facility closure. Therefore, this analysis considers the impacts from closure of one facility at a time since concurrent closure of both facilities is not expected. It is anticipated that each facility will have to submit a closure plan to DTSC at which time, the environmental impacts associated with the closure plan will be addressed through a separate CEQA document. Therefore, this CEQA document only focuses on the environmental impacts associated with the closure requirements in PAR 1420.1. During closure, PAR 1420.1 will require the affected facilities to continue the

<sup>1</sup> Quemetco Source Test Results, 2/2014

<sup>2</sup> Exide is in the middle of closing their facility.



ambient air monitoring and total enclosure provisions until the closure is completed and submit a Compliance Plan for Closure Activities. The plan is expected to include continued use of total enclosures for as long as possible, at least until after all internal and external surfaces have been decontaminated and the structures themselves need to be demolished, then temporary enclosures would be built, as well as housekeeping and maintenance requirement similar to those currently in the rule but allowing flexibility to accommodate decontamination and demolition activities. The Closure Plan requires that any decontamination of the exteriors of structures must occur within a temporary enclosure (e.g., scaffolding enclosed with plastic) with negative pressure. The environmental analysis below conservatively includes the potential impacts from constructing these temporary enclosures even though they are part of another project subject to CEQA (i.e. DTSC's Closure Plan). The analysis below also includes an analysis of construction of temporary enclosures on the roof of the facility as a reasonably foreseeable component of this Rule amendment as it is not clear if the Closure Plan will include this provision.

Although the facilities are already complying with the provisions in the rule and those emissions are considered present in the CEQA baseline, these activities would extend until the facility completes the closure requirements. Therefore, operational impacts associated with continuing the applicable monitoring, housekeeping, and maintenance provisions, and total enclosure requirements during the closure process are analyzed here. In the event that ambient air concentrations during facility closure exceed the rule thresholds and triggers contingency measures, it is anticipated that in order to reduce emissions, the facility will enhance the housekeeping provisions by adding more workers to increase the frequency of washing and vacuuming performed on-site. For the purpose of analyzing potential environmental impacts, as a reasonable worst case assumption, it is assumed that the facility will add 8 construction workers per day, if a compliance plan is triggered.

**Table 2-2 CEQA Summary of Fugitive Emissions Control Options During Facility Closure**

<b>Key Requirements</b>	<b>Potential Environmental Impacts</b>	<b>Environmental Topics to be Analyzed:</b>
Ambient Air Monitoring*	Construction: None Operation: Collect Filters, Analyze Samples	Air Quality, Energy
Total Enclosure Under Negative Air Pressure	Construction: Temporary Enclosures Operation: None	Air Quality, Energy, Hazardous Material, Solid Waste, Transportation
Housekeeping Requirements	Construction: None Operation: Mobile Sweepers, Area washing, Haul waste, Wastewater, Roof washing, Water Tank Truck, Wheel Washing Station	Air Quality, Energy, Hazardous Material, Hydrology, Solid Waste, Transportation
Maintenance Requirements	Construction: None Operation: Water use	Air Quality, Hydrology & Water Quality
Contingency Measures	Construction: None Operation: Enhanced housekeeping measures will require additional workers; Additional water usage	Air Quality, Energy, Hydrology & Water Quality, Population & Housing, Transportation

*\*Air monitoring is required under the existing 1420.1 but has been included here as the proposed Rule amendment clarifies how monitoring will occur during closure activities.*

The stop work provisions of the rule are also not expected to have any significant impacts. These provisions are specifically designed to minimize the release of fugitive emissions. Although the provisions may have an impact on the schedule set forth in the DTSC/Exide Closure Plan, DTSC has advised that modifications to the closure plan are anticipated, but the environmental impacts from those modifications would be less than what is analyzed within this ~~Draft~~ Final SEA and/or DTSC's CEQA document; and DTSC expects and supports a stopping of closure activities if ambient exceedances are occurring. These facts further support a finding of less than significant impacts.

There are other housekeeping and maintenance provisions that do not have a quantifiable environmental impact; such as 5 mph speed limit, covered trash containers, storage of fugitive lead dust waste, inspection of enclosures, cleaning and storage of maintenance equipment, and transport in closed conveyor systems. Other rule language changes are administrative in nature and no environmental impacts would be expected.

## ENVIRONMENTAL CHECKLIST AND DISCUSSION

### I. AESTHETICS.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### Significance Criteria

The proposed project impacts on aesthetics will be considered significant if:

- The project will block views from a scenic highway or corridor.
- The project will adversely affect the visual continuity of the surrounding area.
- The impacts on light and glare will be considered significant if the project adds lighting which would add glare to residential areas or sensitive receptors.

#### Discussion

**I. a) & b)** Both facilities are located in industrial areas. Quemetco already meets the new total facility point source emission limit of 0.003 lb/hr and no further air pollution controls will be needed. Exide is no longer operational and is in the process of facility closure. Therefore, no construction of permanent structures is expected at Quemetco or Exide for PAR 1420.1 compliance. Temporary covering of building surfaces would occur during some closure activities; however they would not be inconsistent with the general industrial nature of the surroundings. During facility closure, the ambient monitoring, housekeeping and maintenance requirements, including the continued operation of negative air pressure enclosures, will continue to be maintained. If contingency measures are triggered during closure activities, the facility will likely increase the frequency of housekeeping measures, which will result in the need for additional workers. No aesthetics will be affected from these activities.

These facilities are not located near scenic vistas, rock outcroppings, historical buildings or state scenic highways<sup>3</sup>.

The additional workers may require the use of vehicles and would be temporary (i.e., taken offsite after construction is finished), and therefore, are not expected to permanently alter the visual character or quality of the site and its surroundings. Therefore, the proposed project would not affect views of the trees from outside of the affected facility and would not significantly affect scenic vistas or damage scenic resources.

**I. c)** No construction of permanent structures is expected at Quemetco or Exide for PAR 1420.1 compliance. Temporary covering of building surfaces would occur during some closure activities; however they would not be inconsistent with the general industrial nature of the surroundings. During facility closure, the ambient monitoring, housekeeping and maintenance requirements, including the continued operation of negative air pressure enclosures, will continue to be maintained. If contingency measures are triggered during closure activities, the facility will likely increase the frequency of housekeeping measures, which will result in the need for additional workers. While the additional workers and their vehicles may be visible from outside of the affected property, it would be temporary and not degrade the views seen at adjacent facilities.

Therefore, PAR 1420.1 would not add significant degradation to the existing visual character or quality of the site and its surroundings.

**I. d)** Both affected facilities are twenty-four hour operations. The facilities are also located in industrial areas that are zoned for continuous operation. No construction of permanent structures is expected at Quemetco or Exide for PAR 1420.1 compliance. During facility closure, the ambient monitoring, housekeeping and maintenance requirements, including the continued operation of negative air pressure enclosures, will continue to be maintained. If contingency measures are triggered during closure activities, the facility will likely increase the frequency of housekeeping measures, which will result in the need for additional workers. Any additional lighting is expected to be similar to the existing onsite lighting and the surrounding facilities. Therefore, PAR 1420.1 is not expected to create a new source of substantial light or glare which would significantly adversely affect day or nighttime views in the area beyond current conditions.

Based upon these considerations, significant adverse aesthetics impacts are not anticipated and will not be further analyzed in this ~~Draft~~ Final SEA. Since no significant aesthetics impacts were identified, no mitigation measures are necessary or required.

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<sup>3</sup> DTSC, Exide Corporation hazardous Waste Facility Permit Draft Environmental Impact Report, SCH No. 93051013, June 2006

**II. AGRICULTURE AND FOREST RESOURCES.**

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland mapping and Monitoring Program of the California Resources Agency, to non- agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104 (g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Project-related impacts on agriculture and forest resources will be considered significant if any of the following conditions are met:

- The proposed project conflicts with existing zoning or agricultural use or Williamson Act contracts.
- The proposed project will convert prime farmland, unique farmland or farmland of statewide importance as shown on the maps prepared pursuant to the farmland mapping and monitoring program of the California Resources Agency, to non-agricultural use.
- The proposed project conflicts with existing zoning for, or causes rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined in Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code § 51104 (g)).
- The proposed project would involve changes in the existing environment, which due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use.

**Discussion**

**II. a) & b)** In general, the affected facilities and surrounding industrial areas are not located on or near areas zoned for agricultural use, Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland mapping and Monitoring Program of the California Resources Agency. Therefore, the proposed project would not result in any construction of new buildings or other structures that would require converting farmland to non-agricultural use or conflict with zoning for agricultural use or a Williamson Act contract. Since the proposed project would not substantially change the facility or process at the facilities, there are no provisions in PAR 1420.1 that would affect land use plans, policies, or regulations. Land use and other planning considerations are determined by local governments and no land use or planning requirements relative to agricultural resources would be altered by the proposed project.

**IV. c) & d)** The affected facilities are located in an industrial area in the urban portion of Los Angeles County that is not near forest land. Therefore, the proposed project is not expected to conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104 (g)) or result in the loss of forest land or conversion of forest land to non-forest use.

Since PAR 1420.1 would not affect the placement of affected equipment near farmland, the proposed project is not expected to result in converting farmland to non-agricultural use; or conflict with existing zoning for agricultural use, or a Williamson Act contract. Similarly, it is not expected that PAR 1420.1 would conflict with existing zoning for, or cause rezoning of, forest land; or result in the loss of forest land or conversion of forest land to non-forest use. Consequently, the proposed project would not create any significant adverse agriculture or forestry impacts. Since no significant agriculture or forestry resources impacts were identified, this topic need not be evaluated further and no mitigation measures are necessary or required.

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**III. AIR QUALITY AND GREENHOUSE GAS EMISSIONS**

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| exceed quantitative thresholds for ozone precursors)?  |                          |                          |                                     |                          |
| d) Expose sensitive receptors to substantial pollutant concentrations?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Create objectionable odors affecting a substantial number of people?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f) Diminish an existing air quality rule or future compliance requirement resulting in a significant increase in air pollutant(s)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| g) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?        | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| h) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Significance Criteria**

To determine whether or not air quality impacts from adopting and implementing the proposed project are significant, impacts will be evaluated and compared to the criteria in Table 2-3. The project will be considered to have significant adverse air quality impacts if any one of the thresholds in Table 2-3 are equaled or exceeded.

To determine whether or not greenhouse gas emissions from the proposed project may be significant, impacts will be evaluated and compared to the 10,000 MT CO<sub>2</sub>/year threshold for industrial sources for SCAQMD lead agency projects.

To determine whether or not air quality impacts from the proposed project may be significant, impacts will be evaluated and compared to the criteria in Table 2-3.

Table 2-3 SCAQMD Air Quality Significance Thresholds

<i>Mass Daily Thresholds<sup>a</sup></i>		
<b>Pollutant</b>	<b>Construction<sup>b</sup></b>	<b>Operation<sup>c</sup></b>
NOx	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM10	150 lbs/day	150 lbs/day
PM2.5	55 lbs/day	55 lbs/day
SOx	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
<i>Toxic Air Contaminants (TACs), Odor, and GHG Thresholds</i>		
<b>TACs</b> (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk $\geq$ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas $\geq$ 1 in 1 million) Chronic & Acute Hazard Index $\geq$ 1.0 (project increment)	
<b>Odor</b>	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
<b>GHG</b>	10,000 MT/yr CO <sub>2</sub> eq for industrial facilities	
<i>Ambient Air Quality Standards for Criteria Pollutants<sup>d</sup></i>		
<b>NO<sub>2</sub></b> 1-hour average annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
<b>PM<sub>10</sub></b> 24-hour average annual average	10.4 $\mu\text{g}/\text{m}^3$ (construction) <sup>e</sup> & 2.5 $\mu\text{g}/\text{m}^3$ (operation) 1.0 $\mu\text{g}/\text{m}^3$	
<b>PM<sub>2.5</sub></b> 24-hour average	10.4 $\mu\text{g}/\text{m}^3$ (construction) <sup>e</sup> & 2.5 $\mu\text{g}/\text{m}^3$ (operation)	
<b>SO<sub>2</sub></b> 1-hour average 24-hour average	0.25 ppm (state) & 0.075 ppm (federal – 99 <sup>th</sup> percentile) 0.04 ppm (state)	
<b>Sulfate</b> 24-hour average	25 $\mu\text{g}/\text{m}^3$ (state)	
<b>CO</b> 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
<b>Lead</b> 30-day Average Rolling 3-month average	1.5 $\mu\text{g}/\text{m}^3$ (state) 0.15 $\mu\text{g}/\text{m}^3$ (federal)	

<sup>a</sup> Source: SCAQMD CEQA Handbook (SCAQMD, 1993)

<sup>b</sup> Construction thresholds apply to both the South Coast Air Basin and Coachella Valley (Salton Sea and Mojave Desert Air Basins).

<sup>c</sup> For Coachella Valley, the mass daily thresholds for operation are the same as the construction thresholds.

<sup>d</sup> Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.

<sup>e</sup> Ambient air quality threshold based on SCAQMD Rule 403.

KEY: lbs/day = pounds per day    ppm = parts per million     $\mu\text{g}/\text{m}^3$  = microgram per cubic meter     $\geq$  = greater than or equal to  
 MT/yr CO<sub>2</sub>eq = metric tons per year of CO<sub>2</sub> equivalents    > = greater than



## **Discussion**

**III. a)** The SCAQMD is required by law to prepare a comprehensive district-wide Air Quality Management Plan (AQMP) which includes strategies (e.g., control measures) to reduce emission levels to achieve and maintain state and federal ambient air quality standards, and to ensure that new sources of emissions are planned and operated to be consistent with the SCAQMD's air quality goals. The AQMP's air pollution reduction strategies include control measures which target stationary, area, mobile and indirect sources. These control measures are based on feasible methods of attaining ambient air quality standards. Pursuant to the provisions of both the state and federal Clean Air Acts (CAA)s, the SCAQMD is required to attain the state and federal ambient air quality standards for all criteria pollutants, including lead. PAR 1420.1 would not obstruct or conflict with the implementation of the AQMP because lead emission reductions are in addition to emission reductions in the AQMP. The SCAQMD adopted the 2012 Lead State Implementation Plan (SIP) for Los Angeles County on May 4, 2012, which relies upon Rule 1420.1 for lead emission reductions. Further, on November 5, 2010, the Governing Board approved the 2010 Clean Communities Plan (CCP). The CCP is an update to the 2000 Air Toxics Control Plan (ATCP)<sup>4</sup> and its 2004 Addendum. The objective of the 2010 CCP is to reduce the exposure to air toxics and air-related nuisances throughout the district, with emphasis on cumulative impacts. The elements of the 2010 CCP are community exposure reduction, community participation, communication and outreach, agency coordination, monitoring and compliance, source-specific programs, and nuisance.

PAR 1420.1 would reduce lead emissions and therefore, be consistent with the goals of the AQMP, 2012 Lead SIP for Los Angeles County, and the 2010 CCP. Therefore, implementing PAR 1420.1 that further reduces lead emissions would not conflict or obstruct implementation of the 2012 Lead SIP for Los Angeles County, AQMP or 2010 CCP.

### **III. b) and f) *Criteria Pollutants***

#### ***Construction Impacts***

##### **New Affected Facilities**

SCAQMD staff is not aware of any new large lead recycling facilities planned to be constructed in the future. So the focus of the analysis will be on the two known affected facilities. At this time, construction of new large lead recycling facilities is considered speculative according to CEQA Guidelines §15145 and will not be evaluated further in this analysis.

##### **Existing Affected Facilities**

Quemetco already meets the new total facility point source emission limit of 0.003 lb/hr and no further air pollution controls will be constructed or needed.

Exide will need to construct temporary enclosures once their permanent enclosures have been demolished. See Table 2-4 for Construction Emissions and Appendix B for details on assumptions.

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<sup>4</sup> SCAQMD Air Toxics Control Plan: <http://www.aqmd.gov/home/library/clean-air-plans/clean-communities-plan/air-toxics-control-plan>

**Table 2-4 Construction Emissions**

<b>Pollutant</b>	<b>Temporary Enclosures Emissions</b>	<b>Construction Significance Thresholds</b>	<b>Exceed Significance?</b>
<b>NO<sub>x</sub></b>	47	100 lbs/day	No
<b>VOC</b>	5.8	75 lbs/day	No
<b>PM<sub>10</sub></b>	2.4	150 lbs/day	No
<b>PM<sub>2.5</sub></b>	2.2	55 lbs/day	No
<b>SO<sub>x</sub></b>	0.05	150 lbs/day	No
<b>CO</b>	22	550 lbs/day	No

***Operational Impacts***

Based on existing lead point source tests, Quemetco is already complying with PAR 1420.1's total facility point source limit (0.003 lb/hr) for lead. There will be no physical changes at Quemetco. Additionally, Exide is in the process of closing their facility. In order for Exide to comply with PAR 1420.1 during closure, Exide will continue the current monitoring, and is expected to continue some housekeeping and maintenance activities, as well as maintain the total enclosures on-site until the building is demolished. Therefore, PAR 1420.1 will not result in construction activities at either of the affected facilities.

For the purpose of the CEQA analysis, reasonable worst-case assumptions have been made: Since Quemetco is already complying with the proposed lower total facility lead point source limit and Exide is no longer operational and is starting the closure process, no impacts are expected for either affected facilities from PAR 1420.1. The additional closure requirements in PAR 1420.1 will affect both facilities during the closure process. Currently, Quemetco continues to operate while Exide is in the process of facility closure. Therefore, this analysis considers the impacts from closure of one facility at a time since concurrent closure of both facilities is not expected. It is anticipated that each facility will have to submit a closure plan to DTSC at which time, the environmental impacts associated with the closure plan will be addressed through a separate CEQA document. Therefore, this CEQA document only focuses on the environmental impacts associated with the requirements in PAR 1420.1 associated with the requirements in PAR 1420.1 that go beyond the DTSC Closure Plan. During closure, PAR 1420.1 will require the affected facilities to continue monitoring, and are expected to continue some housekeeping and maintenance requirements, as well as maintain total enclosures until the closure is completed.

**Table 2-5 CEQA Summary of Fugitive Emissions Control Options During Facility Closure**

<b>Key Requirements</b>	<b>Potential Environmental Impacts</b>	<b>Environmental Topics to be Analyzed:</b>
Ambient Air Monitoring*	Construction: None Operation: Collect Filters, Analyze Samples	Air Quality, Energy
Total Enclosure Under Negative Air Pressure	Construction: Temporary Enclosures Operation: Blowers	Air Quality, Energy, Hazardous Material, Solid Waste, Transportation
Housekeeping Requirements	Construction: None Operation: Mobile Sweepers, Area washing, Haul waste, Wastewater, Roof washing, Wheel Washing Station	Air Quality, Energy, Hazardous Material, Hydrology, Solid Waste, Transportation
Maintenance Requirements	Construction: None Operation: Water use	Air Quality, Hydrology & Water Quality
Compliance Plan	Construction: None Operation: Enhanced housekeeping measures will require additional workers; Additional water usage	Air Quality, Energy, Hydrology & Water Quality, Population & Housing, Transportation

*\*Air monitoring is required under the existing 1420.1 but has been included here as the proposed Rule amendment clarifies how monitoring will occur during closure activities.*

Although the facilities are already complying with the provisions in the rule and those emissions are considered present in the CEQA baseline, these activities will continue until the facility completes the closure requirements. Therefore, operational impacts associated with continuing the operation of APCDs, applicable monitoring, housekeeping and maintenance provisions, and total enclosure requirements during the closure process are conservatively analyzed here even though these activities are part of the current rule and the CEQA baseline activity. In the event that ambient air concentrations during facility closure exceed the rule thresholds and triggers contingency measures, it is anticipated that in order to reduce emissions, it is assumed that the facility will enhance the housekeeping provisions by adding more workers to increase the frequency of washing and vacuuming performed on-site. Since the facility will be in the process of closure, the only construction impacts are from temporary enclosures. Installation of additional pollution control equipment is not anticipated. For the purpose of analyzing potential environmental impacts, it is assumed that the facility will add 8 construction workers per day, if a compliance plan is triggered. The continued operation of the air handling systems and APCDs are expected to be powered by electricity, so no new combustion emissions from these pieces of equipment are expected to be generated. The air quality impacts associated with compliance with PAR 1420.1 are summarized in Table 2-6 SCAQMD Operational Criteria Pollutant Emissions below and do not exceed the SCAQMD thresholds of significance; therefore, impacts are less than significant.

Table 2-6 SCAQMD Operational Criteria Pollutant Emissions

Description	CO, lb/day	NO <sub>x</sub> , lb/day	VOC, lb/day	SOX, lb/day	PM10, lb/day	PM2.5, lb/day
Heavy-Duty Sweeper <sup>a</sup>	0.89	2.69	0.46	0.44	0.49	0.39
Aerial Lift Delivery	0.96	3.06	0.24	0.00	0.15	0.13
Aerial Lift	1.26	2.16	0.40	0.00	0.15	0.14
Air Monitor Visit	0.66	0.07	0.07	0.00	0.01	0.00
Haul Disposal Trip	1.50	7.00	0.30	0.01	0.21	0.15
Water Tank Truck <sup>b</sup>	0.50	2.30	0.07	0.05	0.10	0.00
Compliance Plan – Vehicle trips from 8 additional workers	1.32	0.11	0.03	0.01	0.14	0.00
<b>Total Operational Emissions</b>	<b>7.09</b>	<b>17.39</b>	<b>1.57</b>	<b>0.52</b>	<b>1.25</b>	<b>0.82</b>
Significance Threshold	550	55	150	55	75	150
Exceed Significance?	No	No	No	No	No	No

<sup>a</sup> Emissions are from the 2010 and 2015 Final 1420.1 EAs

<sup>b</sup> Emissions are from the 2015 PAR 1420.1 Final EA-street sweeper, assumed same mileage and emission factors.

### Indirect Criteria Pollutant Emissions from Electricity Consumption

Indirect criteria pollutant and GHG emissions are expected from the generation of electricity to operate new equipment that occurs off-site at electricity generating facilities (EGFs). Emissions from electricity generating facilities are already evaluated in the CEQA documents for those projects when they are built or modified. The analysis in the ~~Draft~~ Final SEA (Section VI. Energy b), c) and d)) demonstrates that there is sufficient capacity from power providers for the increased electricity consumption from PAR 1420.1. Under the RECLAIM program, EGFs were provided annual allocations of NO<sub>x</sub> and SO<sub>x</sub> emissions that decline annually. For this reason, emissions that may be created from EGFs providing electricity specifically for the proposed project would not increase regional NO<sub>x</sub> and SO<sub>x</sub> emissions, since the overall NO<sub>x</sub> and SO<sub>x</sub> emissions generated by EGFs would need to remain within the existing regional annual NO<sub>x</sub> and SO<sub>x</sub> allocations under the RECLAIM program. Lastly, because the NO<sub>x</sub> and SO<sub>x</sub> emissions are limited by the annual RECLAIM allocations, the other criteria pollutants that may be generated from combustion activities associated with electricity generation (e.g., CO, VOC, PM10, and PM2.5) are also limited by stoichiometry, and are already included in the existing setting of the CEQA baseline.

### III. c) Cumulatively Considerable Impacts

The thresholds for cumulative impacts are the same as project-specific thresholds. Based on the foregoing analysis, criteria pollutant project-specific air quality impacts from implementing PAR 1420.1 would not exceed air quality significance thresholds (Table 2-3) and cumulative impacts are not expected to be significant for air quality. Potential adverse impacts from implementing PAR 1420.1 would not be "cumulatively considerable" as defined by CEQA Guidelines §15064(h)(1) for air quality impacts. Per CEQA Guidelines §15064(h)(4), the mere existing of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulative considerable.

The SCAQMD guidance on addressing cumulative impacts for air quality is as follows: “As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR.” “Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.”<sup>5</sup>

This approach was upheld by the Court in *Citizens for Responsible Equitable Environmental Development v. City of Chula Vista* (2011) 197 Cal. App. 4th 327, 334. The Court determined that where it can be found that a project did not exceed the South Coast Air Quality Management District’s established air quality significance thresholds, the City of Chula Vista properly concluded that the project would not cause a significant environmental effect, nor result in a cumulatively considerable increase in these pollutants. The court found this determination to be consistent with CEQA Guidelines §15064.7, stating, “The lead agency may rely on a threshold of significance standard to determine whether a project will cause a significant environmental effect.” The court found that, “Although the project will contribute additional air pollutants to an existing nonattainment area, these increases are below the significance criteria...” “Thus, we conclude that no fair argument exists that the Project will cause a significant unavoidable cumulative contribution to an air quality impact.” As in *Chula Vista*, here the District has demonstrated, when using accurate and appropriate data and assumptions, that the project will not exceed the established South Coast Air Quality Management District significance thresholds. See also, *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal. App. 4th 899. Here again the court upheld the South Coast Air Quality Management District’s approach to utilizing the established air quality significance thresholds to determine whether the impacts of a project would be cumulatively considerable. Thus, it may be concluded that the Project will not cause a significant unavoidable cumulative contribution to an air quality impact.

Based on the foregoing analysis, project-specific air quality impacts from implementing the proposed project would not exceed air quality significance thresholds (Table 2-1); therefore, based on the above discussion, cumulative impacts are not expected to be significant for air quality. Therefore, potential adverse impacts from the proposed project would not be "cumulatively considerable" as defined by CEQA Guidelines §15064(h)(1) for air quality impacts. Per CEQA Guidelines §15064(h)(4), the mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project’s incremental effects are cumulative considerable.

### **III. d) Toxic Air Contaminants (TAC)**

#### ***Construction***

Construction is only expected at Exide. As toxic emissions from construction of onsite temporary enclosures is expected to be minor and take less than two months, no health risk assessment was

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<sup>5</sup> SCAQMD Cumulative Impacts Working Group White Paper on Potential Control Strategies to Address Cumulative Impacts From Air Pollution, August 2003, Appendix D, Cumulative Impact Analysis Requirements Pursuant to CEQA, at D-3, <http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4>.

conducted pursuant to guidance from the Office of Environmental Health Hazard Assessment (2015)<sup>6</sup>, and toxic impacts during construction are less than significant.

### ***Operation***

The goal of PAR 1420.1 is to ensure the continued reduction from lead and arsenic emissions from large lead-acid battery recycling facilities even as the facilities undergo closure. Therefore, PAR 1420.1 is expected to reduce toxic emissions and will not expose sensitive receptors to substantial concentrations.

### ***Exide***

TAC emissions may be generated from diesel exhaust emissions (i.e. heavy-duty trucks). Diesel exhaust particulate is considered a carcinogenic and chronic TAC. However, because their operations have ceased, no more trucks will bring lead-acid batteries for recycling during closure activities. Thus, TAC emissions impacts would be lower than their baseline and will have reduced impacts to nearby sensitive receptors.

Therefore, PAR 1420.1 is not expected to generate significant adverse TAC impacts from construction.

### ***III. e) Odor Impacts***

No construction is expected to occur on-site at Quemetco. Exide is an industrial facility where heavy-duty diesel equipment (sweepers) and trucks already operate. Therefore, the continued operations of mobile sources are not expected to generate diesel exhaust odor greater than what is already present. In addition, because their operations have ceased, no more trucks will bring lead-acid batteries for recycling during closure activities. Thus, odor impacts would be lower than their baseline. PAR 1420.1 compliance is designed to reduce TAC emissions from large lead battery recycling facilities, which may potentially further reduce odors. Therefore, PAR 1420.1 is not expected to generate significant adverse odor impacts.

### ***III. g) and h) Greenhouse Gas Impacts***

Global warming is the observed increase in average temperature of the earth's surface and atmosphere. The primary cause of global warming is an increase of greenhouse gas (GHG) emissions in the atmosphere. The six major types of GHG emissions are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), sulfur hexafluoride (SF<sub>6</sub>), hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs). The GHG emissions absorb longwave radiant energy emitted by the earth, which warms the atmosphere. The GHGs also emit longwave radiation both upward to space and back down toward the surface of the earth. The downward part of this longwave radiation emitted by the atmosphere is known as the "greenhouse effect."

The current scientific consensus is that the majority of the observed warming over the last 50 years can be attributable to increased concentration of GHG emissions in the atmosphere due to human activities. Events and activities, such as the industrial revolution and the increased consumption of fossil fuels (e.g., combustion of gasoline, diesel, coal, etc.), have heavily contributed to the increase in atmospheric levels of GHG emissions. As reported by the California Energy Commission (CEC), California contributes 1.4 percent of the global and 6.2

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<sup>6</sup> Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, Office of Environmental Health Hazard Assessment, 2015.

percent of the national GHG emissions (CEC, 2004). Further, approximately 80 percent of GHG emissions in California are from fossil fuel combustion (e.g., gasoline, diesel, coal, etc.).

GHGs are typically reported as CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e). CO<sub>2</sub>e is the amount of CO<sub>2</sub> that would have the same global warming potential (relative measure of how much heat a greenhouse gas traps in the atmosphere) as a given mixture and amount of greenhouse gas. CO<sub>2</sub>e is estimated by the summation of mass of each GHG multiplied by its global warming potential (global warming potentials: CO<sub>2</sub> = 1, CH<sub>4</sub> = 21, N<sub>2</sub>O = 310, etc.).<sup>7</sup>

### **Construction**

No construction is expected at Quemetco. Exide is expected to construct temporary enclosures. Based on the same assumptions made for the construction criteria pollutant estimates, approximately 4,820 metric tons of CO<sub>2</sub>e would be generated from all construction activity. Amortized over 30 years as prescribed by the SCAQMD Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans<sup>8</sup> adopted by the SCAQMD Governing Board in December 2008, approximately 1 metric tons of CO<sub>2</sub>e emissions per year (see Appendix B for calculations) would be generated from construction activities over the life of the project.

### **Operation**

#### Quemetco

Quemetco is not expected to have any new GHG impacts for PAR 1420.1 compliance. Any emissions from Quemetco during closure (Quemetco currently has no foreseeable plan to close) would likely be no greater than those occurring at Exide and would also not occur in the same year as Exide's closure. Therefore, any GHG impact from Quemetco would be less than analyzed for Exide.

#### Exide

The operation of the negative air pressure systems, enhanced measures during maintenance activities and housekeeping, and wheel washer are not expected to generate greenhouse gases as the equipment control emissions has no secondary emissions impacts. However, the operation of the street sweeper, water tank truck, worker vehicles, and haul/delivery trucks may result in the generation of 2,672.5 metric tons of CO<sub>2</sub>e operational emissions per year. The addition of 2,673.5 metric tons of CO<sub>2</sub>e emissions from construction and operation are less than the SCAQMD significance threshold of 10,000 metric tons per year for CO<sub>2</sub>e from industrial projects.

Therefore, PAR 1420.1 is not expected to generate GHG emission, either directly or indirectly, that may have a significant impact on the environment no conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHG gases.

### **Conclusion**

Based upon these considerations, the proposed project would not generate significant adverse construction or operational air quality impacts and, therefore, no further analysis is required or necessary and no mitigation measures are necessary or required.

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<sup>7</sup> California Air Resource Board Conversion Table: <http://www.arb.ca.gov/cc/facts/conversiontable.pdf>

<sup>8</sup> SCAQMD Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds>

**IV. BIOLOGICAL RESOURCES.**

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by §404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



### **Significance Criteria**

Impacts on biological resources will be considered significant if any of the following criteria apply:

- The project results in a loss of plant communities or animal habitat considered to be rare, threatened or endangered by federal, state or local agencies.
- The project interferes substantially with the movement of any resident or migratory wildlife species.
- The project adversely affects aquatic communities through construction or operation of the project.

### **Discussion**

**IV. a), b), c), d), e) & f)** In general, the affected facilities and the surrounding industrial areas currently do not support riparian habitat, federally protected wetlands, or migratory corridors because they are long developed and established foundations used for industrial purposes. Additionally, special status plants, animals, or natural communities identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service are not expected to be found in close proximity to the affected facility. Therefore, the proposed project would have no direct or indirect impacts that could adversely affect plant or animal species or the habitats on which they rely in the SCAQMD's jurisdiction.

Compliance with PAR 1420.1 is expected to reduce lead emissions from operations at the affected facility, which would improve, not worsen, present conditions of plant and animal life, since these TAC emissions would be captured destroyed or disposed of properly before they impact plant and animal life. PAR 1420.1 does not require acquisition of additional land or further conversions of riparian habitats or sensitive natural communities where endangered or sensitive species may be found.

The proposed project is not envisioned to conflict with local policies or ordinances protecting biological resources or local, regional, or state conservation plans because it is only expected to affect existing large lead-acid battery recycling facilities located in an industrial area. PAR 1420.1 is designed to lead emissions which would also reduce emissions both inside and outside the boundaries of the affected facilities and, therefore, more closely in line with protecting biological resources. Land use and other planning considerations are determined by local governments and no land use or planning requirements would be altered by the proposed project. Additionally, the proposed project would not conflict with any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or any other relevant habitat conservation plan, and would not create divisions in any existing communities because all activities associated with complying with PAR 1420.1 would occur at existing established industrial facilities.

The SCAQMD, as the Lead Agency for the proposed project, has found that, when considering the record as a whole, there is no evidence that the proposed project will have potential for any new adverse effects on wildlife resources or the habitat upon which wildlife depends because all activities needed to comply with PAR 1420.1 would take place at long developed and established facilities. Accordingly, based upon the preceding information, the SCAQMD has, on the basis of substantial evidence, rebutted the presumption of adverse effect contained in §753.5 (d), Title 14 of the California Code of Regulations. Further, in accordance with this conclusion, the SCAQMD believes that this proposed project qualifies for the no effect determination pursuant to Fish and Game Code §711.4 (c).

Based upon these considerations, significant adverse biological resources impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

**V. CULTURAL RESOURCES.**

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource, site, or feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code §21074?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Impacts to cultural resources will be considered significant if:

- The project results in the disturbance of a significant prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group.
- Unique paleontological resources are present that could be disturbed by construction of the proposed project.
- The project would disturb human remains.

**Discussion**

**V. a), b), c), & d)** The existing large lead-acid battery recycling facilities are located in areas zoned as industrial, which have already been greatly disturbed. Quemetco already meets the new total facility point source emission limit of 0.003 lb/hr and no further air pollution controls will be needed. Exide is no longer operational and is in the process of facility closure. Therefore, no construction is expected at Quemetco for PAR 1420.1 compliance. Exide is expected to construct temporary enclosures. During facility closure, the ambient monitoring, housekeeping and maintenance requirements, including the continued operation of negative air pressure enclosures, will continue to be maintained. If contingency measures are triggered during closure activities, the facility will likely increase the frequency of housekeeping measures, which will result in the need for additional workers. Therefore, the proposed project has no potential to

cause a substantial adverse change to a historical or archaeological resource, directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, or disturb any human remains, including those interred outside formal cemeteries.

Based on the above discussion, the proposed project is not expected to create any significant adverse effect to a historical resource as defined in §15064.5; cause a new significance impact to an archaeological resource as defined in §15064.5; directly or indirectly destroy a unique paleontological resource, site, or feature; or disturb any human including those interred outside formal cemeteries.

**V. e)** PAR 1420.1 is not expected to require physical changes to a site, feature, place, cultural landscape, sacred place or object with cultural value to a California Native American Tribe. Furthermore, the proposed project is not expected to result in a physical change to a resource determined to be eligible for inclusion or listed in the California Register of Historical Resources or included in a local register of historical resources. For these reasons, the proposed project is not expected to cause any substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code §21074.

It is important to note that as part of releasing this CEQA document for public review and comment, the SCAQMD also provided a formal notice of the proposed project to all California Native American Tribes (Tribes) that requested to be on the Native American Heritage Commission’s (NAHC) notification list per Public Resources Code §21080.3.1 (b)(1). The NAHC notification list provides a 30-day period during which a Tribe may respond to the formal notice, in writing, requesting consultation on the proposed project.

In the event that a Tribe submits a written request for consultation during this 30-day period, the SCAQMD will initiate a consultation with the Tribe within 30 days of receiving the request in accordance with Public Resources Code §21080.3.1 (b). Consultation ends when either: 1) both parties agree to measures to avoid or mitigate a significant effect on a Tribal Cultural Resource and agreed upon mitigation measures shall be recommended for inclusion in the environmental document [see Public Resources Code §21082.3 (a)]; or, 2) either party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached [see Public Resources Code §21080.3.2 (b)(1)-(2) and §21080.3.1 (b)(1)].

Based upon these considerations, significant adverse cultural resources impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

**VI. ENERGY.**

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
Would the project:				
a) Conflict with adopted energy conservation plans?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the need for new or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	substantially altered power or natural gas utility systems?				
c)	Create any significant effects on local or regional energy supplies and on requirements for additional energy?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Create any significant effects on peak and base period demands for electricity and other forms of energy?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	Comply with existing energy standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Impacts to energy and mineral resources will be considered significant if any of the following criteria are met:

- The project conflicts with adopted energy conservation plans or standards.
- The project results in substantial depletion of existing energy resource supplies.
- An increase in demand for utilities impacts the current capacities of the electric and natural gas utilities.
- The project uses non-renewable resources in a wasteful and/or inefficient manner.

**Discussion**

**VI. a) & e)** PAR 1420.1 does not require any action which would result in any conflict with an adopted energy conservation plan or violation of any energy conservation standard. PAR 1420.1 is not expected to conflict with adopted energy conservation plans because existing facilities would be expected to continue implementing any existing energy conservation plans.

PAR 1420.1 is not expected to cause new development. The local jurisdiction or energy utility sets standards (including energy conservation) and zoning guidelines regarding new development and will approve or deny applications for building new equipment at the affected facility. During the local land use permit process, the project proponent may be required by the local jurisdiction or energy utility to undertake a site-specific CEQA analysis to determine the impacts, if any, associated with the siting and construction of new development.

As a result, PAR 1420.1 would not conflict with energy conservation plans, use non-renewable resources in a wasteful manner, or result in the need for new or substantially altered power or natural gas systems.

**VI. b), c) & d.**

Quemetco already meets the new total facility point source emission limit of 0.003 lb/hr and no further air pollution controls will be needed. Exide is no longer operational and is in the process of facility closure. Therefore, no construction is expected at Quemetco for PAR 1420.1 compliance. Exide is expected to construct temporary enclosures. During facility closure, the ambient monitoring, housekeeping and maintenance requirements, including the continued operation of negative air pressure enclosures, will continue to be maintained. If contingency measures are triggered during closure activities, the facility will likely increase the frequency of housekeeping measures, which will result in the need for additional workers.

## Electricity Impacts

### Quemetco

No new energy impacts are expected at Quemetco’s facility during its normal operation. If Quemetco closes (it currently has no foreseeable plan to do so), its energy impacts are not anticipated to be any higher than analyzed for Exide below.

### Exide

During facility closure, compliance with PAR 1420.1 may cause an increase in electricity consumption associated with the continued operation of existing ambient monitoring equipment, housekeeping and maintenance requirements, including the negative air pressure enclosures. Gasoline fuel would be consumed by the vehicles needed for ambient air monitoring sampling, the additional workers should a compliance plan be triggered and haul/delivery truck trips during closure. The following sections evaluate the various forms of energy sources affected by the proposed project.

The five existing air monitors are expected to be electric powered. Air monitors are expected to be powered by electricity service near where the air monitors are placed. An air monitor typically requires 16 amps of service (six amps for the monitor and 10 amps for vacuum pumps), for a total of 211.2 kW -h (5 monitors x 16 amps x 110 voltage x 24 hr)<sup>9</sup>.

The California Energy Commission (CEC) latest report showed that Los Angeles Department of Water and Power (LADWP) consumed 25,921 gigawatts (GW) in 2008 with a peak consumption of 5,717 megawatts per hour (MWh) in 2008. The power required to run PAR 1420.1 energy needs at Exide would be 0.00007 % of the 2008 consumption and 3.6 % of the peak consumption. Therefore, SCAQMD staff concludes that the amount of electricity required to meet the incremental energy demand associated with PAR 1420.1 would be sufficient and would not result in a significant adverse electricity energy impact. (See Table 2-7 and Table 2-8 for details.)

**Table 2-7: PAR 1420.1 Additional Electricity Consumption**

Energy Use	Consumption (kW-h)
Blowers for APCD and negative air pressure (100 bhp) @ 1788 kW-h x 10	17,880
Air Monitors (5 monitors, 24 hrs/day)	211.2
<b>Total</b>	<b>18,091</b>

**Table 2-8 Electricity Use from PAR 1420.1 Compliance**

Area	Electricity Use, kW/hr	Electricity Use, MW/year	Area Consumption, GW-H	Area Consumption %	Area Peak Consumption MW-hr	Area Peak Consumption%
LADWP	18,091	158,477	25,921	7.0E-05	5,717	3.6

## Natural Gas Impacts

No new natural gas impacts are expected.

<sup>9</sup> Power = (A x V)/1000= (16 amps x 110 voltage)/1000= 1.76 kW x 24 hr = 42.24 kW-hr per monitor.

## **Diesel Impacts**

### **Construction Diesel Use**

No construction is expected at Quemetco. Exide will need to construct temporary enclosures. See Table 2-9 and Appendix B for details.

### **Operational Diesel Use**

No new diesel use is expected at Quemetco for PAR 1420.1 compliance.

Exide

#### ***Diesel Use***

A maximum of two truck trips per day to deliver filters and dispose of additional hazardous material. These trucks would use 24 gallons (40+200 miles ÷ 10 mpg) per event. By assuming two truck trips per week, there will be 104 trucks/yr. The year's total of diesel use will be 1,248 gal/yr.

#### ***Sweeper Diesel Use***

Exide is expected to continue their diesel vehicle sweeping. Diesel use was estimated for the three sweeping events at the affected facility. Diesel use was estimated assuming that sweepers would be nine feet wide, sweep over the entire outside area around the production site (i.e., not around administrative buildings) three times a day with two feet of overlap on the return path as the sweepers travel back and forth. Assuming a ten mile per gallon of diesel fuel efficiency approximately 0.84 gallons of diesel would be consumed on a peak day and 307 gal/yr.

#### ***Aerial Lift Diesel Use***

PAR 1420.1 requires roof washings or vacuuming on either a quarterly or semi-annual basis. The facilities would need to use aerial lifts to reach the roofs. Therefore, only one additional aerial lift diesel-fueled use is expected on any given day. For this analysis, the aerial lifts would be used six hours per day. Diesel fuel use was estimated using a 1.4 gallon per hour fuel consumption from ARB's OFFROAD2007 database. The diesel fuel use from aerial lifts would be 8.4 gallons per day. On a yearly basis, worse-case would be quarterly cleanings facilities would consume 34 gal/yr (8.4 gal/day\*4 day/yr).

Roof cleaning may be contracted out, so it is assumed that aerial lifts are delivered. A single heavy-duty diesel truck round trip of 40 miles per day is expected to be required on a peak day. Assuming a ten mile per gallon of diesel fuel efficiency approximately 8 gallons of diesel would be consumed on a peak day. On a yearly basis, worse-case for quarterly deliveries would consume 416 gal/yr (8 gal/day\*4 day/yr\*13 facilities).

## **Gasoline Use**

### **Construction Gasoline Use**

No construction is expected at Quemetco. Exide will need to construct temporary enclosures. See Table 2-9 and Appendix B for details.

### **Operational Gasoline Use**

No new gasoline usage is expected at Quemetco for PAR 1420.1 compliance.

**Exide**

*Air Monitoring*

One trip per day to visit air monitors, based on average of 80 miles round trip and a 16 mile per gallon fuel efficiency, would consume approximately 5 gallons of gasoline on a peak day; annually would use 1,300 gal/yr (5 gal/day x 5 days/week x 52 weeks).

*Worker Trips*

Additional worker trips may be associated with additional enhanced maintenance activities and housekeeping provisions. It was assumed that 4 additional workers would be required to do the enhanced housekeeping measures (4 additional gasoline-fueled vehicle trips). Assuming a 20 mile round trip, and a 10 mile per gallon fuel efficiency, approximately 8 gallons of gasoline would be used by the additional workers' vehicle trips per day and 2,920 gal/yr .

The 2012 AQMP states that 524 million gallons of diesel and 5,589 million gallons gasoline are consumed per year in Los Angeles County. An additional 1,589 gallons of diesel consumed and 1,308 gallons of gasoline consumed per year of operation is not expected to have a significant adverse impact on fuel supplies. Table 2-9 provides a summary of all the fuel usage impacts.

**Table 2-9 Annual Total Projected Fuel Usage for Operational Activities**

Type of Equipment	Diesel	Gasoline
	(gal/yr)	(gal/yr)
Construction Phase	1,915.36	320
Delivery/Haul Trucks	1,248	N/A
Sweeper Vehicles	307	N/A
Aerial Lifts	34	N/A
Air Monitoring Vehicle	N/A	1,300
Worker Trips	N/A	2920
<b>Total:</b>	3,504	4,540
<b>Year 2012 Projected Basin Fuel Demand (gal/yr)<sup>a</sup></b>	524,000,000	5,589,000,000
<b>Total % Above Baseline</b>	0.00066877	8.1231E-05
<b>Exceed Significance?</b>	<b>No</b>	<b>No</b>

<sup>a</sup> Figures taken from Table 3.3-3 of the 2012 AQMP Final EIR

Based upon these considerations, significant adverse energy impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

**VII. GEOLOGY AND SOILS.**

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Impacts on the geological environment will be considered significant if any of the following criteria apply:

- Topographic alterations would result in significant changes, disruptions, displacement, excavation, compaction or over covering of large amounts of soil.



- Unique geological resources (paleontological resources or unique outcrops) are present that could be disturbed by the construction of the proposed project.
- Exposure of people or structures to major geologic hazards such as earthquake surface rupture, ground shaking, liquefaction or landslides.
- Secondary seismic effects could occur which could damage facility structures, e.g., liquefaction.
- Other geological hazards exist which could adversely affect the facility, e.g., landslides, mudslides.

### **Discussion**

**VII. a)** Quemetco already meets the new total facility point source emission limit of 0.003 lb/hr and no further air pollution controls will be needed. Exide is no longer operational and is in the process of facility closure. Therefore, no construction is expected at Quemetco for PAR 1420.1 compliance. Exide is expected to construct temporary enclosures. During facility closure, the ambient monitoring, housekeeping and maintenance requirements, including the continued operation of negative air pressure enclosures, will continue to be maintained. If contingency measures are triggered during closure activities, the facility will likely increase the frequency of housekeeping measures, which will result in the need for additional workers.

Because Southern California is an area of known seismic activity, existing facilities are expected to conform to the Uniform Building Code and all other applicable state and local building codes. As part of the issuance of building permits, local jurisdictions are responsible for assuring that the Uniform Building Code is adhered to and can conduct inspections to ensure compliance. The Uniform Building Code is considered to be a standard safeguard against major structural failures and loss of life. The basic formulas used for the Uniform Building Code seismic design require determination of the seismic zone and site coefficient, which represents the foundation condition at the site.

During closure, it is expected that the existing total enclosures would be maintained and operational until the entire closure is ready to be demolished. The existing enclosures would have followed the Uniform Building Code's seismic requirements and PAR 1420.1 is not expected to increase exposure to existing earthquake risk.

**VII. b)** No construction is expected at Quemetco for PAR 1420.1 compliance. Exide is expected to construct temporary enclosures. Therefore, no significant soil erosion or significant loss of topsoil, significant unstable earth conditions or significant changes in geologic substructures are expected to occur at the affected facility as a result of implementing the proposed project.

**VII. c)** Since the proposed project would affect existing facilities whose soil has already been disturbed, it is expected that the soil types present at the affected facility would not be further susceptible to expansion or liquefaction other than is already existing. Furthermore, subsidence and liquefaction is not anticipated to be a problem since any excavation, grading, or filling activities are expected to follow the Uniform Building Code. Additionally, the affected areas are not envisioned to be prone to landslides, instability, or have unique geologic features since the affected existing facility is located in industrial areas in a flat area.

**VII. d) & e)** Since PAR 1420.1 would affect soils at an existing established facility located in a highly developed industrial zone, it is expected that people or property would not be exposed to expansive soils or soils incapable of supporting water disposal. Both affected facilities have existing wastewater treatment systems that would continue to be used even in facility closure, and these systems are expected to have the capacity to support the closure requirements of PAR 1420.1. Sewer systems are available to handle wastewater produced and treated by the affected facilities. Therefore, PAR 1420.1 would not require the installation of new septic tanks or alternative wastewater disposal systems at the affected facility. As a result, PAR 1420.1 would not require operators to utilize septic systems or alternative wastewater disposal systems. Thus, the proposed project would not adversely affect soils normally associated with a septic system or alternative wastewater disposal system.

Based upon these considerations, significant adverse geology and soil impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

**VIII. HAZARDS AND HAZARDOUS MATERIALS.**

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, and disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public use airport or a private	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

airstrip, would the project result in a safety hazard for people residing or working in the project area?

- |  |                          |                          |                                     |                                     |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| h) Significantly increased fire hazard in areas with flammable materials?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Significance Criteria**

Impacts associated with hazards will be considered significant if any of the following occur:

- Non-compliance with any applicable design code or regulation.
- Non-conformance to National Fire Protection Association standards.
- Non-conformance to regulations or generally accepted industry practices related to operating policy and procedures concerning the design, construction, security, leak detection, spill containment or fire protection.
- Exposure to hazardous chemicals in concentrations equal to or greater than the Emergency Response Planning Guideline (ERPG) 2 levels.

**Discussion**

**VIII. a) & b)** PAR 1420.1 is expected to reduce the amount of lead being emitted into the air. With respect to the closure provisions, PAR 1420.1 requires Exide to continue monitoring, housekeeping and maintenance activities. These requirements are expected to control and reduce fugitives such that the rule is not expected to create impacts in connection with the handling of hazardous wastes. In addition, PAR 1420.1 specifically requires that a facility cease all closure activities if there is an exceedance of an arsenic or lead ambient concentration limit.

The stop work provisions of the rule are also not expected to have any significant impacts. These provisions are specifically designed to reduce the release of fugitive emissions. Although the provisions may have an impact on the schedule set forth in the DTSC/Exide Closure Plan, DTSC has advised that modifications to the closure plan are anticipated, but the environmental impacts from those modifications would be less than what is analyzed within this ~~Draft~~ Final SEA and/or DTSC’s CEQA document; and DTSC expects and supports a stopping of closure activities if ambient exceedances are occurring. These facts further support a finding of less than significant impacts.

Spent lead is already transported for treatment offsite and out of the Basin. Therefore, no new significant hazards are expected to the public or environment through its routine transport, use and disposal.

Lead in water is not considered volatile. The wastewater systems require secondary containment in the case of an upset to prevent the release of the lead containing water. Therefore, compliance with PAR 1420.1 is not expected to create a significant hazard to the public or environment through reasonably foreseeable upset conditions involving the release of hazardous materials into the environment

Therefore, PAR 1420.1 is not expected to create a significant hazard to the public or environment through reasonably foreseeable upset conditions involving the release of hazardous materials into the environment.

**VIII. c)** No schools are located within a quarter mile of Quemetco and Exide. Therefore, PAR 1420.1 would not result in hazardous emissions, handling of hazardous or acutely hazardous materials, substances or wastes within one-quarter mile of an existing or proposed school.

**VIII. d)** Government Code §65962.5 refers to hazardous waste handling practices at facilities subject to the Resources Conservation and Recovery Act (RCRA). Both PAR 1420.1 affected facilities are on the Cortese List as presented in the ENVIROSTOR<sup>10</sup> database.

Since no earth moving or grading is expected at either Quemetco or Exide, no additional hazards from soil disturbances are expected.

During closure, PAR 1420.1 requires Exide to continue the ambient monitoring, housekeeping and maintenance provisions in the rule, which includes the operation of total enclosures under negative air pressure until the building is demolished. Compliance with PAR 1420.1 will reduce the emissions of potentially toxic fugitive dust from the facility during closure.

In addition, hazardous waste is expected to be disposed properly offsite so the proposed project would not increase a hazard at the affected site or the public and environment offsite. Hazardous wastes from Exide are required to be managed in accordance with applicable federal, state, and local rules and regulations. Accordingly, significant hazards impacts from the disposal/recycling of hazardous materials are not expected from the implementation of PAR 1420.1.

**VIII. e)** Exide is not near any airports or private airstrips. Quemetco is within six miles of the El Monte Airport. PAR 1420.1 would result in the reduction of lead emissions during operation and facility closure. Secondary TAC emissions from the proposed project were addressed in the Air Quality section of this ~~Draft~~ Final SEA and found to be less than significant. Therefore, no new hazards are expected to be introduced at the affected facility that could create safety hazards at local airports or private airstrips. Therefore, PAR 1420.1 is not expected to result in a safety hazard for people residing or working in the project area even within the vicinity of an airport.

**VIII. f)** Emergency response plans are typically prepared in coordination with the local city or county emergency plans to ensure the safety of the public (surrounding local communities), and the facility employees as well. The proposed project would not impair implementation of, or physically interfere with any adopted emergency response plan or emergency evacuation plan. The existing affected facility already has an emergency response plan in place. The addition of air pollution control equipment and possible replacement of the storm water retention pond with

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<sup>10</sup> <http://www.envirostor.dtsc.ca.gov>

storage tanks is not expected to require modification of the existing emergency response plan at the affected facility. Thus, PAR 1420.1 is not expected to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

**VIII. g)** The proposed project affects facilities located in highly developed areas and are not adjacent to wildland, so potential for a wildland fire from the proposed project does not exist.

**VIII. h)** The Uniform Fire Code and Uniform Building Code set standards intended to minimize risks from flammable or otherwise hazardous materials. Local jurisdictions are required to adopt the uniform codes or comparable regulations. Local fire agencies require permits for the use or storage of hazardous materials and permit modifications for proposed increases in their use. Permit conditions depend on the type and quantity of the hazardous materials at the facility. Permit conditions may include, but are not limited to, specifications for sprinkler systems, electrical systems, ventilation, and containment. The fire departments make annual business inspections to ensure compliance with permit conditions and other appropriate regulations. Further, businesses are required to report increases in the storage or use of flammable and otherwise hazardous materials to local fire departments. Local fire departments ensure that adequate permit conditions are in place to protect against potential risk of upset. The proposed project would not change the existing requirements and permit conditions.

The proposed project would also not increase the existing risk of fire hazards in areas with flammable brush, grass, or trees. No substantial or native vegetation typically exists on or near the affected facilities (specifically because such areas could allow the accumulation of fugitive lead dust), the existing rule requires the encapsulating (paving or asphaltting) of all facility grounds. So the proposed project is not expected to expose people or structures to wild fires. Therefore, no significant increase in fire hazards is expected at the affected facilities associated with the proposed project.

Based upon these considerations, significant adverse hazards and hazardous materials impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

**IX. HYDROLOGY AND WATER QUALITY.**

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
Would the project:				
a) Violate any water quality standards, waste discharge requirements, exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board, or otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project: groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				
c) Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in substantial erosion or siltation on- or off-site or flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Place housing or other structures within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam, or inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Require or result in the construction of new water or wastewater treatment facilities or new storm water drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
Would the project: effects?				
h) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Significance Criteria**

Potential impacts on water resources will be considered significant if any of the following criteria apply:

Water Demand:

- The existing water supply does not have the capacity to meet the increased demands of the project, or the project would use more than 262,820 gallons per day of potable water.
- The project increases demand for total water by more than five million gallons per day.

Water Quality:

- The project will cause degradation or depletion of ground water resources substantially affecting current or future uses.
- The project will cause the degradation of surface water substantially affecting current or future uses.
- The project will result in a violation of National Pollutant Discharge Elimination System (NPDES) permit requirements.
- The capacities of existing or proposed wastewater treatment facilities and the sanitary sewer system are not sufficient to meet the needs of the project.
- The project results in substantial increases in the area of impervious surfaces, such that interference with groundwater recharge efforts occurs.
- The project results in alterations to the course or flow of floodwaters.

**Discussion**

The two existing affected facilities have on-site wastewater treatment operations. For Exide, during closure, they plan on using their existing wastewater treatment or have a portable wastewater treatment system to comply with the publicly owned treatment works (POTW) permits. Exide is also in the process of reevaluating their POTW permits. The wastewater systems at both facilities treat process water and storm water before it is discharged to the POTWs. The discharged water must comply with existing lead water quality standards.

No construction is foreseeable at Quemetco and Exide will require construction of temporary enclosures including scaffolding and plastic sheeting. However, Exide would have water impacts from PAR 1420.1's maintenance activities and housekeeping measures. The following sections discuss the water impacts in detail.

**IX. a)** PAR 1420.1 would not alter any existing wastewater treatment requirements of the Los Angeles County Sanitation District (LACSD) and Regional Water Quality Control Board or otherwise substantially degrade water quality that the requirements are meant to protect the environment. Although the amount of water used by Exide may increase, all of the storm water and wastewater from the facility would still be required to be treated by the onsite wastewater treatment.

Discharge concentrations are currently and would continue to be limited by the Industrial Wastewater Discharge Permit.<sup>11</sup> Exide's Hazardous Waste Facility Permit states that any wastewater that does not meet the discharge concentrations set by the LACSD would have to be cycled through the treatment plant until the discharge criteria is met or discharged as hazardous waste.<sup>12</sup> Since wastewater from the facility is treated in an on-site wastewater treatment facility, heavily regulated, and enforced, no change in the water quality of the discharge is expected.

**IX. b)** PAR 1420.1 would not require the use of groundwater. The facilities use potable water that is treated in their respective on-site wastewater treatment, reused, and then directed to the sanitary sewer. Therefore, it would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge.

**IX. c) & d)** No physical changes are expected at either facility in order to comply with PAR 1420.1 which will alter the existing drainage pattern, storm water collection or wastewater treatment of either facility.

Therefore, PAR 1420.1 is a project that is not expected to have significant adverse effects on any existing drainage patterns, or cause an increase rate or amount of surface runoff water that would exceed the capacity of the facilities' existing or planned storm water drainage systems.

**IX. e) & f)** PAR 1420.1 does not include or require any new or additional construction activities to build additional housing that could be located in 100-year flood hazard areas. Hence, PAR 1420.1 is not expected to result in placing housing in 100-year flood hazard areas that could create new flood hazards. Therefore, PAR 1420.1 is not expected to generate significant impacts regarding placing housing in a 100-year flood zone.

For the same reasons as those identified in the preceding paragraph, PAR 1420.1 is not expected to create significant adverse impacts from flooding as a result of failure of a levee or dam or inundation by seiches, tsunamis, or mudflows because the proposed project does not require levee or dam construction, and the affected facilities are located on flat land far from the ocean.

**IX. g)** The proposed project is not expected to generate significant water use or wastewater generation (see IX. h). PAR 1420.1 will not significantly affect the facilities' water and

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<sup>11</sup> According to Los Angeles County Sanitation District- (June 28, 2013).

<sup>12</sup> Exide Technologies, Hazardous Waste Facility Permit, Attachment "A", 2006, [www.dtsc.ca.gov/HazardousWaste/Projects/upload/Exide\\_dPermit.pdf](http://www.dtsc.ca.gov/HazardousWaste/Projects/upload/Exide_dPermit.pdf)



wastewater generation. Therefore, no additional water or waste water treatment facilities are expected nor any planned expansion of the facilities' existing on-site wastewater treatment system.

**Exide**

During closure, Exide is expected to continue operation of the on-site WWTP until such time that the WWTP is not needed. Furthermore, as part of the closure process, Exide will be applying for a NPDES general construction permit. Therefore, based on the analysis in this environmental checklist, PAR 1420.1 is not expected to result in the construction of new water or waste water treatment facilities, new storm water drainage facilities, expansion of existing facilities, or construction of which could cause significant environmental effects. Therefore, no further analysis or mitigation measures are required or necessary.

**IX. h)**

**Construction Impacts**

No construction is expected at Quemetco. Exide will need to construct temporary enclosures. See Table 2-9 and Appendix B for details.

**Operational Impacts**

No new operational impacts are expected for Quemetco.

Exide is also expected to use additional water for the wheel washer station and housekeeping related activities. The wheel washer is expected to use 24 gallons of water per vehicle and a maximum of 30 vehicles per day. The total daily water consumption from the wheel washer station would be 720 gal/day. Currently, Exide fills their one water tank truck approximately 15 times per day, which has a capacity of 3,000 gallons. This equates to 45,000 gal/day of water per day during housekeeping operations<sup>13</sup>. Staff estimates that the housekeeping water usages for PAR 1420.1 compliance will continue. This activity is conservatively added to the project's total water use, however it is already part of the existing setting.

Exide may need a maintenance team to minimize their fugitive dust for the enhanced housekeeping and maintenance requirements. The maintenance team will use water hoses to water down the dust from these activities. SCAQMD staff estimates these activities will result in 200 gal/day.

**Table 2-10: PAR 1420.1 Additional Water Consumption**

Water Application	Additional Water Usage (gal/day)
<b>Enhanced Maintenance Activities</b>	200
<b>Wheel Washer Station</b>	720
<b>Enhanced Housekeeping Measures</b>	45,000
<b>Total</b>	<b>45,920</b>
<b>Significance Threshold</b>	262,820
<b>Exceed Significance Threshold?</b>	<b>No</b>

<sup>13</sup> Housekeeping operations include street sweeping, watering, and washing the facility.

Therefore, the total additional use would be 45,920 gal/day of water, which is less than the significance threshold of 262,820 gal/day of potable water and total water demand of more than five million gallons per day (see Table 2-10: PAR 1420.1 Additional Water ). Therefore, sufficient water supplies are expected to be available to serve the project from existing entitlements and resources without the need for new or expanded entitlements. Therefore, PAR 1420.1 is not expected to be significant for operational water demand.

Thus, the impacts to water are based on a worst case daily water demand from the operational phase of the project.

**IX. i)**

**Quemetco**

No impacts are expected for Quemetco's sewer system.

**Exide**

No significant impacts are expected for Exide's sewer system.

Exide will continue to operate their WWT system during closure. Once the WWT system has been dismantled, Exide plans on having a temporary portable WWT system to comply with their wastewater discharge permits.

Exide has an Industrial Wastewater Discharge Permit with a maximum 310,000 gal/day limit. The daily wastewater peak discharge rate for the fiscal year 2011/2012 was 132,630 gal/day based on the annual surcharge statement submitted by the company. Their permitted maximum peak discharge limit is 300 gpm. They had a peak discharge rate<sup>14</sup> of 236 gpm.

An increase of 32 gpm of discharged wastewater would increase their total peak discharge rate to 268 gpm of wastewater (32 gpm + 236 gpm), which would be less than the maximum permitted wastewater discharge rate of 300 gpm for the existing wastewater system. The additional 43,200 gal/day of discharged wastewater would result in an average facility wastewater discharge rate of 175,830 gal/day, which would be less than the permit maximum wastewater discharge rate of 310,000 gal/day, so no change to current permit is required.

If the proposed project does trigger a wastewater discharge rate that exceeds the 310,000 gal/day limit, the LACSD deems that a secondary peak permit could be required to allow the discharge during non-peak hours. Significance thresholds for industrial wastewater discharge is determined by its impact to the affected sewer system. The LACSD provided that there is not any hydraulic overloading of the sewer system downstream of the Exide facility. However, wastewater flow can also affect relief or repair work, but no relief or repair work in the near future was identified by the LACSD. Based on the existing sewer system used by Exide, the LACSD believes that an additional 30 gpm can be accommodated by the existing sewer system.

Therefore, based on the above analysis, there would be adequate capacity to serve the proposed project's projected demand addition to the provider's existing commitments.

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<sup>14</sup> A peak discharge rate is based on the average of the ten highest 30-minute peak flow periods.

Based upon these considerations, significant adverse hydrology and water quality impacts are not anticipated and, therefore, no further analysis is required or necessary.

**X. LAND USE AND PLANNING.**

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Land use and planning impacts will be considered significant if the project conflicts with the land use and zoning designations established by local jurisdictions.

**Discussion**

**X. a)** Quemetco already meets the new total facility point source emission limit of 0.003 lb/hr and no further air pollution controls will be needed. Exide is no longer operational and is in the process of facility closure. Therefore, no construction is expected at Quemetco for PAR 1420.1 compliance. Exide is expected to construct temporary enclosures.

During facility closure, the ambient monitoring, housekeeping and maintenance requirements, including the continued operation of negative air pressure enclosures, will continue to be maintained. If contingency measures are triggered during closure activities, the facility will likely increase the frequency of housekeeping measures, which will result in the need for additional workers. Therefore, the proposed project would not create divisions in any existing communities.

**X. b)** Land use and other planning considerations are determined by local governments. Construction and operation of a new temporary enclosure during closure of the Exide facility would occur within the boundaries of an existing large lead recycling facility, which is in an area that is zoned for industrial use. The new PAR 1420.1 requirements are not designed to impede or conflict with existing land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, but to assist in avoiding or mitigating lead emissions impacts from large lead recycling facilities. Operations at both affected facilities would still be expected to comply, and not interfere, with any applicable land use plans, zoning ordinances.

Based upon these considerations, significant adverse land use and planning impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

**XI. MINERAL RESOURCES.**

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Project-related impacts on mineral resources will be considered significant if any of the following conditions are met:

- The project would result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
- The proposed project results in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

**Discussion**

**XI. a) & b)** There are no provisions in PAR 1420.1 that would result in the loss of availability of a known mineral resource of value to the region and the residents of the state such as aggregate, coal, clay, shale, et cetera, or of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

Based upon these considerations, significant adverse mineral resources are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

**XII. NOISE.**

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
Would the project result in:				
a) Exposure of persons to or generation of permanent noise levels in excess of	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				
b)	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public use airport or private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Impacts on noise will be considered significant if:

- Construction noise levels exceed the local noise ordinances or, if the noise threshold is currently exceeded, project noise sources increase ambient noise levels by more than three decibels (dBA) at the site boundary. Construction noise levels will be considered significant if they exceed federal Occupational Safety and Health Administration (OSHA) noise standards for workers.
- The proposed project operational noise levels exceed any of the local noise ordinances at the site boundary or, if the noise threshold is currently exceeded, project noise sources increase ambient noise levels by more than three dBA at the site boundary.

**Discussion**

**XI. a), b) & c)** Noise is usually defined as sound that is undesirable because it interferes with speech communication and hearing, is intense enough to damage hearing, or is otherwise annoying (unwanted noise). Sound levels are measured on a logarithmic scale in decibels (dB). The universal measure for environmental sound is the "A" weighted sound level (dBA), which is the sound pressure level in decibels as measured on a sound level meter using the A-weighted filter network. "A" scale weighting is a set of mathematical factors applied by the measuring instrument to shape the frequency content of the sound in a manner similar to the way the human ear responds to sounds.

Federal, state and local agencies regulate environmental and occupational, as well as, other aspects of noise. Federal and state agencies generally set noise standards for mobile sources, while regulation of stationary sources is left to local agencies. Local regulation of noise involves implementation of General Plan policies and Noise Ordinance standards, which are general principles, intended to guide and influence development plans. Noise Ordinances set forth specific standards and procedures for addressing particular noise sources and activities. The Occupational Safety and Health Administration (OSHA) sets and enforces noise standards for worker safety.

Groundborne vibration is quantified in terms of decibels, since that scale compresses the range of numbers required to describe the oscillations. The Federal Transit Administration uses vibration decibels (abbreviated as VdB) to measure and assess vibration amplitude. Vibration is referenced to one micro-inch/sec (converted to 25.4 micro-mm/sec in the metric system) and presented in units of VdB.

Based on existing lead point source tests, Quemetco is already complying with PAR 1420.1's total facility point source limit (0.003 lb/hr) for lead. There will be no physical changes at Quemetco. Additionally, Exide is in the process of closing their facility. In order for Exide to comply with PAR 1420.1 during closure, Exide will likely continue the current monitoring, housekeeping and maintenance activities, as well as maintain the existing total enclosures on-site and construct temporary enclosures made of scaffolding and plastic sheeting during decontamination and deconstruction. No significant noise or vibration generating activities are anticipated during this relatively minor construction activity that would be any greater than occurs in the baseline activity onsite. Therefore, PAR 1420.1 will not result in significant noise or vibration impacts from construction.

Both facilities are located in areas which are industrial in nature. During closure, the noise generated by continuing the ambient monitoring, housekeeping and maintenance requirements, and operating the total enclosure under negative air pressure is negligible when compared to the noise generated by the demolition activities. Therefore, noise and vibration impacts are considered less than significant.

**XI. d)** The affected facility is not near any airports or private airstrips. The closest airport or airstrip is the Hawthorne Municipal Airport, which is 9.6 miles from the affected facility. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels within two miles of a public use airport or private airstrip.

Based upon these considerations, significant adverse noise impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

**XIII. POPULATION AND HOUSING.**

Would the project:	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Induce substantial growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (e.g. through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Impacts of the proposed project on population and housing will be considered significant if the following criteria are exceeded:

- The demand for temporary or permanent housing exceeds the existing supply.
- The proposed project produces additional population, housing or employment inconsistent with adopted plans either in terms of overall amount or location.

**Discussion**

**XIII. a)** Quemetco already meets the new total facility point source emission limit of 0.003 lb/hr and no further air pollution controls will be needed. Exide is no longer operational and is in the process of facility closure. Therefore, no construction is expected at Quemetco for PAR 1420.1 compliance. Exide is expected to construct temporary enclosures. During facility closure, the ambient monitoring, housekeeping and maintenance requirements, including the continued operation of negative air pressure enclosures, will likely continue to be maintained. If contingency measures are triggered during closure activities, the facility will likely increase the frequency of housekeeping measures, which will result in the need for an additional 8 workers. The proposed project is not anticipated to generate any significant effects, either direct or indirect, on the district's population or population distribution. Human population within the jurisdiction of the SCAQMD is anticipated to grow regardless of implementing PAR 1420.1. It is expected that the additional 8 workers needed for the compliance plan would be from the local labor pool in Southern California. As such, PAR 1420.1 would not result in changes in population densities or induce significant growth in population.

**XIII. b)** Since PAR 1420.1 affects two existing facilities, it is not expected to result in the creation of any industry that would affect population growth, directly or indirectly, induce the construction of single- or multiple-family units, or require the displacement of people elsewhere.

Based upon these considerations, significant adverse population and housing impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

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**XIV. PUBLIC SERVICES.**

Would the proposal result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- |                             |                          |                          |                          |                                     |
|-----------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Police protection?       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Schools?                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Other public facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**Significance Criteria**

Impacts on public services will be considered significant if the project results in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response time or other performance objectives.

**Discussion**

**XIV. a) & b)** PAR 1420.1 would not involve the use of new flammable or combustible materials. As a result, no new fire hazards or increased use of hazardous materials would be introduced at the affected facilities that would require additional emergency responders such as police or fire departments or additional demand from these resources. Thus, no new demands for fire or police protection are expected from PAR 1420.1.

**XIV. c)** As noted in the “Population and Housing” discussion, implementation of the proposed project would not have a significant impact on inducing growth. The additional workers needed for the compliance plan would come from the local labor pool in southern California. As a result, PAR 1420.1 would have no direct or indirect effects on population growth in the district. Therefore, there would be no increase in local population and thus no impacts are expected to local schools as a result of PAR 1420.1.

**XIV. d)** Because the proposed project involves requirements that are similar to existing operations already in place at an existing facility and the facilities are already heavily regulated, PAR 1420.1 is not expected to require the need for additional government services. Enforcement of PAR 1420.1 is expected to be performed by the existing SCAQMD inspectors for these facilities. Further, the proposed project would not result in the need for new or physically altered government facilities in order to maintain acceptable service ratios, response times, or other performance objectives. There will be no increase in population and, therefore, no need for physically altered government facilities.

Based upon these considerations, significant adverse public services impacts are not anticipated and, therefore, no further analysis is required or necessary.

**XV. RECREATION.**

- |  | <b>Potentially Significant Impact</b> | <b>Less Than Significant With Mitigation</b> | <b>Less Than Significant Impact</b> | <b>No Impact</b>                    |
|--|---------------------------------------|--|-------------------------------------|-------------------------------------|
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities | <input type="checkbox"/>              | <input type="checkbox"/>                     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |



- such that substantial physical deterioration of the facility would occur or be accelerated?
- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment or recreational services?

**Significance Criteria**

Impacts to recreation will be considered significant if:

- The project results in an increased demand for neighborhood or regional parks or other recreational facilities.
- The project adversely affects existing recreational opportunities.

**Discussion**

**XV. a) & b)** As previously discussed under “Land Use,” there are no provisions in PAR 1420.1 that would affect land use plans, policies, or regulations. Land use and other planning considerations are determined by local governments; no land use or planning requirements would be altered by the proposed project. Further, implementation of PAR 1420.1 would not increase the use of existing neighborhood and regional parks or other recreational facilities or include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment because the proposed project is not expected to induce population growth.

Based upon the above considerations, significant adverse recreation impacts are not anticipated and, therefore, no further analysis is required or necessary.

**XVI. SOLID/HAZARDOUS WASTE.**

Would the project:	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Comply with federal, state, and local statutes and regulations related to solid and hazardous waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Significance Criteria**

The proposed project impacts on solid/hazardous waste will be considered significant if the following occurs:

- The generation and disposal of hazardous and non-hazardous waste exceeds the capacity of designated landfills.

### **Discussion**

**XVI.a)** Landfills are permitted by the local enforcement agencies with concurrence from the California Department of Resources Recycling and Recovery (CalRecycle). Local agencies establish the maximum amount of solid waste which can be received by a landfill each day and the operational life of a landfill.

### **Construction**

No construction is expected at Quemetco. Exide is expected to construct temporary enclosures to comply with PAR 1420.1. The plastic sheeting of 1,234 cubic yards would generate 41 disposal trucks during construction. (See Table 2-11 and Appendix B for details).

### **Operation**

#### **Exide**

Exide will be operating their APCDs during much of their closure process. Therefore, operation of control equipment such as filters could have solid waste impacts.

This analysis of solid waste impacts assumes that safety and disposal procedures required by various agencies in the state of California will provide reasonable precautions against the improper disposal of hazardous wastes in a municipal waste landfill. Because of state and federal requirements, some facilities are attempting to reduce or minimize the generation of solid and hazardous wastes by incorporating source reduction technologies to reduce the volume or toxicity of wastes generated, including improving operating procedures, using less hazardous or nonhazardous substitute materials, and upgrading or replacing inefficient processes.

### **Filtration**

Filtration includes usage of baghouse, HEPA filters. All mixed metal compounds could be generated with the use of filtration controls at a 99.9 percent control rate.

Currently, the facilities properly send their hazardous materials to their local smelter or to Resource Conservation and Recovery Act (RCRA) landfill. To comply with the proposed rule's requirements, it is conservatively estimated that the operation of the APCDs' filters may generate 3200 cubic yards/yr (4480 tons/yr) of hazardous waste.

The nearest RCRA landfills are the Republic Services and US Ecology. The Republic Services La Paz County Landfill has approximately 20,000,000 cubic yards of capacity remaining for the 50 year life expectancy (400,000 cubic yards per year). The US Ecology, Inc., facility in Beatty, Nevada has approximately 638,858 cubic yards of capacity remaining for the three year life expectancy (212,952 cubic yards per year). US Ecology, Inc., receives approximately 18,000 cubic yards per year of waste, so 194,952 cubic yards per year (212,952 cubic yard/year – 18,000 cubic yard/year) would be available.

With an annual disposal of 4,434 cubic yards of filters, spent lead, metals and plastic sheeting, the total solid/hazardous waste impact from the proposed amended rule are 1.1 percent and 2.27 percent of the available Republic Services and US Ecology landfill capacity, respectively.

The amount of hazardous waste generated by the proposed project will not require new RCRA landfills and is not considered to be a substantial impact to existing landfill capacity. Therefore, potential hazardous waste impacts are not considered significant.

**Table 2-11 Total Solid Waste Generation**

Waste Type	Potential # APC Devices	Annual Waste per Control Device (cubic yards)	Total Waste Generated (cubic yards/year)
Filtration	5	640	3,200
Plastic Sheeting	--	--	1,234
TOTAL WASTE GENERATED FROM PROPOSED PROJECT			<b>4,434 cubic yards/yr or 12.1 cubic yards/day</b>

Therefore, the increase in hazardous waste disposal from PAR 1420.1 is expected to be less than significant for operational hazardous waste disposal.

**XVI.b)** The rule amendments are not inconsistent with federal, state and local statutes and regulations related to soil and hazardous waste. It is assumed that facility operators at the affected facilities will comply with all applicable local, state, or federal waste disposal regulations.

Implementing PAR 1420.1 is not expected to interfere with any affected facility’s ability to comply with applicable local, state, or federal waste disposal regulations.

Based upon these considerations, significant adverse solid/hazardous waste impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

**XVII. TRANSPORTATION/TRAFFIC.**

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	paths, and mass transit?				
b)	Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c)	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d)	Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e)	Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f)	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Significance Criteria**

Impacts on transportation/traffic will be considered significant if any of the following criteria apply:

- Peak period levels on major arterials are disrupted to a point where level of service (LOS) is reduced to D, E or F for more than one month.
- An intersection’s volume to capacity ratio increase by 0.02 (two percent) or more when the LOS is already D, E or F.
- A major roadway is closed to all through traffic, and no alternate route is available.
- The project conflicts with applicable policies, plans or programs establishing measures of effectiveness, thereby decreasing the performance or safety of any mode of transportation.
- There is an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system.
- The demand for parking facilities is substantially increased.
- Water borne, rail car or air traffic is substantially altered.
- Traffic hazards to motor vehicles, bicyclists or pedestrians are substantially increased.
- The need for more than 350 employees
- An increase in heavy-duty transport truck traffic to and/or from the facility by more than 350 truck round trips per day
- Increase customer traffic by more than 700 visits per day.

**Discussion**

**Existing Affected Facilities**

Quemetco already meets the new total facility point source emission limit of 0.003 lb/hr and no further air pollution controls will be needed. Exide is no longer operational and is in the process of facility closure. No construction is expected at Quemetco. Exide will construct temporary enclosures. It is estimated that an additional 8 worker trips per day and 2 truck trips per day would occur. or Exide for PAR 1420.1 compliance. These trips are below the significance threshold.

***Operation Impacts***

Based on existing lead point source tests, Quemetco is already complying with PAR 1420.1’s total facility point source limit (0.003 lb/hr) for lead. There will be no physical changes at Quemetco. Additionally, Exide is in the process of closing their facility. In order for Exide to comply with PAR 1420.1 during closure, Exide will continue the current monitoring, housekeeping and maintenance activities, as well as maintain the total enclosures on-site. Therefore, PAR 1420.1 will not result in construction activities at Quemetco, while Exide is expected to construct temporary enclosures. .

**XVII. a) & b)**

Exide is expected to continue their housekeeping and maintenance activities (i.e. vehicle sweeping, water tank usage, worker trips, air monitoring visits and haul/delivery truck trips). Vehicle sweeping and water tank usage occurs on-site and does not affect public roadways. SCAQMD staff assumed that at any given day would, Exide would generate an additional 2 truck trips per day in the entire district additional for delivery and disposal of hazardous waste. Overall, there would be 1 worker trip for collecting samples and 8 worker trips for housekeeping and maintenance activities. These potential trips are not expected to significantly adversely affect circulation patterns on local roadways or the level of service at intersections near affected facilities. In addition, this volume of additional daily truck traffic is negligible over the entire area of the district.

**Table 2-12 Estimation of Vehicle Trips**

<b>Phase</b>	<b>Worker Vehicles</b>	<b>Delivery/Disposal Trucks</b>
<b>Operation</b>	9 per day	2 per day <sup>a</sup>

<sup>a</sup> A maximum of 1 worker trip for collecting samples and 8 worker trips. A maximum of 2 delivery/disposal trucks may travel in the District

**XVII. c)** The affected facility is not near any airports or private airstrips. The closest airport or airstrip is the Hawthorne Municipal Airport, which is 9.6 miles from the affected facility. Any actions that would be taken to comply with the proposed project are not expected to influence or affect air traffic patterns or navigable air space, since no new structures or equipment are expected to enter air space used by aircraft. Thus, PAR 1420.1 would not result in a change in air traffic patterns including an increase in traffic levels or a change in location that results in substantial safety risks.

**XVII. d) & e)** The proposed project does not involve construction of any roadways or other transportation design features, so there would be no change to current roadway designs that could increase traffic hazards. The siting of the affected facility is consistent with surrounding land uses and traffic/circulation in the surrounding areas of the affected facility. Thus, the proposed project is not expected to substantially increase traffic hazards or create incompatible uses at or adjacent to the affected facility. Emergency access at the affected facility is not expected to be impacted by the proposed project. Further, each affected facility is expected to continue to maintain their existing emergency access during closure. Therefore, PAR 1420.1 is not expected to alter the existing long-term circulation patterns and is not expected to require a modification to circulation, thus, no long-term impacts on the traffic circulation system are expected to occur.

**XVII. f)** The affected facilities would still be expected to comply with, and not interfere with adopted policies, plans, or programs supporting alternative transportation (e.g. bicycles or buses). Since all PAR 1420.1 compliance activities would occur on-site, PAR 1420.1 would not hinder compliance with any applicable alternative transportation plans or policies.

Based upon these considerations, significant adverse transportation/traffic impacts are not anticipated. Therefore, no further analysis or mitigation measures are required or necessary.

**XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.**

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

projects, and the effects of probable future projects)

- c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

**Discussion**

**XVIII. a)** As discussed in the “Biological Resources” section, PAR 1420.1 is not expected to significantly adversely affect plant or animal species or the habitat on which they rely because any construction and operational activities associated with affected sources are expected to occur entirely within the boundaries of existing developed facilities in areas that have been greatly disturbed and that currently do not support any species of concern or the habitat on which they rely. PAR 1420.1 is not expected to reduce or eliminate any plant or animal species or destroy prehistoric records of the past.

**XVIII. b)** Based on the foregoing analyses, PAR 1420.1 would not result in significant adverse project-specific environmental impacts. Potential adverse impacts from implementing PAR 1420.1 would not be "cumulatively considerable" as defined by CEQA Guidelines §15064(h)(1) for any environmental topic because there are no, or only minor incremental project-specific impacts that were concluded to be less than significant. Per CEQA Guidelines §15064(h)(4), the mere existing of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project’s incremental effects are cumulative considerable. SCAQMD cumulative significant thresholds are the same as project-specific significance thresholds. Therefore, there is no potential for significant adverse cumulative or cumulatively considerable impacts to be generated by the proposed project for any environmental topic.

**XVIII. c)** Based on the foregoing analyses, PAR 1420.1 are not expected to cause adverse effects on human beings for any environmental topic. As previously discussed in environmental topics I through XVIII, the proposed project has no potential to cause significant adverse environmental effects. Therefore, no further analysis or mitigation measures are required or necessary.

## **APPENDICES**

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**APPENDIX A**

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**PROPOSED AMENDED RULE 1420.1**

In order to save space and avoid repetition, please refer to the latest version of Proposed Amended Rule 1420.1 located elsewhere in the September 2015 Governing Board Package. The version of Proposed Amended Rule 1420.1 that was circulated with the Draft SEA and released on July 22, 2015 for a 30-day public review and comment period which ended on August 20, 2015 was identified as PAR 1420.1r July 2015. Original hard copies of the Draft SEA, which include the draft version of the proposed amended rule listed above, can be obtained through the SCAQMD Public Information Center at the Diamond Bar headquarters or by calling (909) 396-2039.

**APPENDIX B**

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**ASSUMPTIONS AND CALCULATIONS**

In order to save space and avoid repetition, please refer to the Draft SEA that was circulated with and released on July 22, 2015 for a 30-day public review and comment period which ended on August 20, 2015 for all of the assumptions and calculations. Original hard copies of the Draft SEA, can be obtained through the SCAQMD Public Information Center at the Diamond Bar headquarters or by calling (909) 396-2039.

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BOARD MEETING DATE: September 4, 2015

AGENDA NO. 42

PROPOSAL: Adopt Proposed Rule 1420.2 – Emission Standards for Lead from  
Metal Melting Facilities

*(Staff is recommending that the public hearing on this item be continued to the  
October 2, 2015 Board Meeting.)*

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BOARD MEETING DATE: September 4, 2015

AGENDA NO. 43

PROPOSAL: 2016 Air Quality Management Plan White Papers

SYNOPSIS: Eight of ten white papers have been completed providing scientific background and policy considerations that will inform the development of the 2016 Air Quality Management Plan. The white papers incorporate feedback and comments from working groups and members of the public. The white paper topics include a Blueprint for Clean Air, PM Controls, VOC Controls, Passenger Transportation, Goods Movement, Off-Road Equipment, Residential/Commercial Energy Use, and a Business Case for Clean Air Strategies. The white papers are being released today for a final public review. The Board will receive public comments at the October 2, 2015 Board Meeting.

COMMITTEE: Committee review as per topic, various dates

RECOMMENDED ACTION:

None.

Barry R. Wallerstein, D.Env.  
Executive Officer

PF:MK

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