

BOARD MEETING DATE: May 3, 2019

AGENDA NO. 23

REPORT: Stationary Source Committee

SYNOPSIS: The Stationary Source Committee held a meeting on Friday, April 19, 2019. The following is a summary of the meeting.

RECOMMENDED ACTION:
Receive and file.

Ben Benoit, Chair
Stationary Source Committee

LT:cr

Committee Members

Present: Council Member Ben Benoit/Chair (videoconference)
Supervisor Janice Hahn (videoconference)
Mayor Judith Mitchell (arrived at 10:34 a.m.)
Supervisor V. Manuel Perez (videoconference)

Absent: Supervisor Janice Rutherford

Call to Order

Chair Benoit called the meeting to order at 10:30 a.m.

INFORMATIONAL ITEMS:

1. Update on Implementation of Rule 1180- Refinery Fenceline and Community Air Monitoring

Dr. Jason Low, Assistant Deputy Executive Officer/Science & Technology Advancement, provided an update on Rule 1180 implementation, including an overview of the fenceline air monitoring plan requirements, plan review and approval process, approved fenceline air monitoring coverage, upcoming activities, future milestones and partial refinery approval letters.

Mayor Mitchell asked if there were any pollutants that would not be included in monitoring. Dr. Low replied that all required Rule 1180 pollutants will be monitored, and that additional pollutants may be also measured in the areas around refineries under other South Coast AQMD monitoring efforts such as AB 617.

Mayor Mitchell also asked if staff is satisfied with the quality of the fence-line air monitoring equipment to be installed by the refineries. Dr. Low replied that staff worked with each refinery to assure that instruments selected satisfied strict detection capability criteria. He also added that important quality assurance details will be addressed during the approval of the QA/QC portion of the plans.

Supervisor Hahn stated that she had received questions from her constituents about the refinery fence-line air monitoring plans, approval process, and capabilities of air monitoring equipment to detect hydrogen fluoride (HF) at Torrance and Valero refineries. She expressed concern about apparent gaps in fence-line air monitoring coverage of Valero refinery. Dr. Low explained that staff conducted multiple visits to the Valero refinery and confirmed the refinery's assessment that installation of open-path monitors was not possible along those portions of the refinery fence-line. Dr. Low also pointed out that these gaps were located away from predominant wind direction. Supervisor Hahn also expressed concern that HF would not be monitored along Crenshaw Blvd., which is a public road cutting through the Torrance refinery and runs near the HF unit. Dr. Low and Executive Officer Wayne Nastri explained that Rule 1180 focuses on fence-line monitoring, but the refinery maintains a number of sensors directly at the HF alkylation unit, upwind, downwind of the alkylation unit, and at Crenshaw Blvd., that are designed to notify of HF release. Council Member Benoit suggested generating a map outlining all current and future HF monitors at the Torrance and Valero refineries. Dr. Low also clarified that HF monitoring equipment approved by staff is capable of detecting both very low and high concentrations of HF. All partial approval letters have been posted on the South Coast AQMD website along with public comments and staff responses. Supervisor Hahn also requested that ample notice be given for the upcoming Rule 1180 public meetings, and for meetings to be held in areas that are easy for the public to access. She offered her office's assistance with organizing the meetings.

Oscar Espino-Padron, Earthjustice, thanked staff for working with the refineries on improving the air monitoring plans, but asked for greater community involvement. Mr. Padron echoed Supervisor Hahn's request for increased community involvement, asked for a 30-day notice for upcoming community meetings, convenient locations to hold the meetings, and to involve the community in organizing the meetings.

2. Compliance Update on Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

Terrence Mann, Assistant Deputy Executive Officer/Compliance & Enforcement, presented an update on the recently issued Advisory Notice for Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities.

Mayor Mitchell asked whether general contractors performing work on residences are aware of the current requirements of Rule 1403. Mr. Mann responded that general contractors should be aware of the requirements and, in the course of their training, would have been informed of the existence of special regulatory requirements for asbestos.

Peter Whittingham, Buried Utilities Coalition (BUC), expressed concern about proposed amendments to Rule 1403. Mr. Whittingham thanked staff for taking the time to meet with BUC and advised that the coalition would be seeking a buried utilities provision. He requested that provisions of concern to buried utility pipelines be added to the proposed rule, including training requirements for asbestos handling. Mr. Whittingham stated that water districts had never been involved in asbestos accidents resulting in public exposure. He also noted staff's recent identification of asbestos contained in asphalt and commented that the BUC had not received any data in support of that finding. Mr. Whittingham advised that the BUC agreed with the "Call & Go" provision currently being considered for the amended rule, but indicated that survey requirements would interfere with water utilities' ability to address imminent threats and provide essential services to the public.

WRITTEN REPORTS:

3. Monthly Update of Staff's Work with U.S. EPA on New Source Review Issues for the Transition of RECLAIM Facilities to a Command and Control Regulatory Program

The report was acknowledged by the Committee.

4. Notice of Violation Penalty Summary

The report was acknowledged by the Committee.

5. Twelve-month and Three month Rolling Price RTCs for Compliance Years 2018 and 2019

The report was acknowledged by the Committee.

OTHER MATTERS:

6. Other Business

There was no other business.

7. Public Comment Period

There were no public comments.

8. Next Meeting Date

The next regular Stationary Source Committee meeting is scheduled for Friday, May 17, 2019.

Adjournment

The meeting was adjourned at 11:16 a.m.

Attachments

1. Attendance Record
2. Monthly Update of Staff's Work with U.S. EPA on New Source Review Issues for the Transition of RECLAIM Facilities to a Command and Control Regulatory Program
3. Draft Notice of Violation Penalty Summary
4. Twelve-month and Three-month Rolling RTCs for Compliance Years 2018 and 2019

ATTACHMENT 1

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
STATIONARY SOURCE COMMITTEE**

Attendance – April 19, 2019

Council Member Ben Benoit (videoconference).....	South Coast AQMD Governing Board
Supervisor Janice Hahn (videoconference)	South Coast AQMD Governing Board
Mayor Judith Mitchell	South Coast AQMD Governing Board
Supervisor V. Manuel Perez (videoconference).....	South Coast AQMD Governing Board
Marisa Perez	Board Consultant (Mitchell)
Andy Silva	Board Consultant (Rutherford)
Curtis Coleman.....	Southern California Air Quality Alliance
Rita Loof.....	RadTech
Bill Pearce	Boeing
David Rothbart	Los Angeles County Sanitation Districts
Susan Stark	Marathon Petroleum
Peter Whittingham.....	Whittingham Public Affairs Advisors
Tammy Yamasaki.....	Southern California Edison
Barbara Baird.....	South Coast AQMD staff
Amir Dejbakhsh.....	South Coast AQMD staff
Marian Coleman	South Coast AQMD staff
Philip Fine	South Coast AQMD staff
Bayron Gilchrist	South Coast AQMD staff
Jason Low	South Coast AQMD staff
Terrence Mann.....	South Coast AQMD staff
Matt Miyasato.....	South Coast AQMD staff
Susan Nakamura.....	South Coast AQMD staff
Wayne Nastri	South Coast AQMD staff
Sarah Rees.....	South Coast AQMD staff
Laki Tisopulos	South Coast AQMD staff
Jill Whynot	South Coast AQMD staff

April 2019 Update on Work with U.S. EPA on New Source Review Issues for the RECLAIM Transition

Staff has been working with U.S. EPA to resolve New Source Review (NSR) issues as RECLAIM facilities exit to a command and control regulatory structure. At the October 5, 2018 Governing Board Meeting, the Board directed staff to provide the Stationary Source Committee with a monthly update of staff's work with U.S. EPA regarding resolving NSR issues for the transition of facilities from RECLAIM to a command and control regulatory structure. The table below summarizes key activities over the past month.

Item	Discussion
Teleconference with U.S. EPA – March 7, 2019	<ul style="list-style-type: none"> • Discussed agenda items for the March 14, 2019 in person meeting at U.S. EPA Region IX
In person meeting with U.S. EPA – March 14, 2019	<ul style="list-style-type: none"> • Staff presented the following three key NSR issues with the RECLAIM transition <ul style="list-style-type: none"> ○ Offsetting obligations ○ Permitting ○ Offset availability • Discussed NSR and Federal Clean Air Act requirements for an equivalency demonstration • Discussed calculation methodologies for NSR events. • U.S. EPA expressed concerned with retaining only some provisions of Regulation XX, since RECLAIM was approved as a whole program • U.S. EPA recommends that facilities remain in RECLAIM until NSR, Regulation XX, and command and control rules are amended/adopted and SIP approved <ul style="list-style-type: none"> ○ Will require amendment to Rule 2001 in order to remove RECLAIM opt-out provisions
Teleconference with U.S. EPA – April 9, 2019	<ul style="list-style-type: none"> • Follow-up discussion from the March 14, 2019 meeting at U.S. EPA Region IX • U.S. EPA provided additional guidance on exiting facilities
RECLAIM Working Group Meeting – April 11, 2019	<ul style="list-style-type: none"> • Provided an overview of the meeting with U.S. EPA • Discussed approach for demonstrating equivalency for the 12 tpd RECLAIM shave and RECLAIM NSR • Discussed concept for amendments to Rule 2001 to remove the opt-out provision

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
General Counsel's Office**

**March 2019 Settlement Penalty Report
DRAFT**

Total Penalties

Civil Settlements:	\$132,250.00
Self-Reported Settlements:	\$6,000.00
MSPAP Settlements:	\$21,890.00
Hearing Board Settlements:	\$24,000.00

Total Cash Settlements:	\$184,140.00
Total SEP Value:	\$0.00

Fiscal Year through 3 / 2019 Cash Total:	\$5,578,181.50
Fiscal Year through 3 / 2019 SEP Value Only Total:	\$265,000.00

Fac ID	Company Name	Rule Number	Settled Date	Init	Notice Nbr	Total Settlement
Civil Settlements						
115394	AES ALAMITOS, LLC	2012(c)(3)(A)	3/13/2019	SH	P62083	\$1,000.00
118406	CARSON COGENERATION COMPANY	2004 2012	3/27/2019	VKT	P65804	\$2,500.00
800030	CHEVRON PRODUCTS CO.	1176	3/8/2019	TRB	P64039	\$2,500.00
136128	DALLAS CLEANERS, JESUS CRISTAL	203(a) 1421	3/5/2019	SMP	P64464	\$5,000.00
181072	FLYERS #4422	461 H&S 41960	3/13/2019	KCM	P68404	\$1,800.00
184354	GEMTECH COATINGS	203(b)	3/26/2019	DH	P64091	\$500.00

Fac ID	Company Name	Rule Number	Settled Date	Init	Notice Nbr	Total Settlement
129816	INLAND EMPIRE ENERGY CENTER, LLC	2004 2012 Appen A	3/13/2019	VKT	P64409	\$4,000.00
147371	INLAND EMPIRE UTILITIES AGENCY	3002 3004	3/1/2019	KCM	P65034	\$9,850.00
16338	KAISER ALUMINUM FABRICATED PRODUCTS, LLC	2004 2012 2012 Appen A 3002(c)(1)	3/26/2019	SH	P60280 P61611 P61735 P62067 P64381 P64384 P64410	\$60,500.00
58563	MERCURY PLASTICS INC	3002 3003	3/26/2019	BST	P65383	\$24,000.00
20203	RECONSERVE OF CALIFORNIA LOS ANGELES INC	2004 2012	3/8/2019	TRB	P57875 P57879 P57880 P66207	\$9,000.00
52517	REXAM BEVERAGE CAN COMPANY	2004(f)(1) 2012 Appen A 3002(c)(1)	3/13/2019	SH	P61731 P67360	\$5,000.00
105277	SULLY MILLER CONTRACTING CO	2004 2012	3/19/2019	ML	P60576 P66851	\$6,600.00

Total Civil Settlements: \$132,250.00

Fac ID	Company Name	Rule Number	Settled Date	Init	Notice Nbr	Total Settlement
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Self-Reported Settlements

89127	TRI-STAR ELECTRONICS INTERNATIONAL INC <i>Self-Reported Violation# SRV2018-5</i>	203	3/1/2019	DH		\$6,000.00
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Total Self-Reported Settlements: \$6,000.00

Fac ID	Company Name	Rule Number	Settled Date	Init	Notice Nbr	Total Settlement
MSPAP Settlements						
122876	ALL AMERICAN ASPHALT	403(d)(1)	3/27/2019	GC	P65214	\$3,060.00
179811	ASEPTIC TECHNOLOGY LLC	201 203 1415	3/8/2019	GC	P65763	\$1,600.00
186472	CLEANSTREET	403	3/8/2019	GC	P66302	\$800.00
116146	COSTCO WHOLESALE	203	3/8/2019	GC	P68407	\$1,530.00
171881	EMBASSY SUITES SANTA ANA	222 1415	3/27/2019	GC	P63866	\$1,300.00
154407	GREEN VALLEY MARKET	461	3/27/2019	GC	P64923	\$1,100.00
183372	H & M INC DBA ARCO OF FULLERTON	461	3/27/2019	GC	P65746	\$400.00
186575	IMPERIAL VALLEY CLEANERS	203	3/27/2019	GC	P65768	\$400.00
178873	LOS ANGELES COMMUNITY HOSPITAL AT BELLFL	203(a)	3/8/2019	TF	P65219	\$800.00
187773	PIONEER COACH INC.	13 CCR 2485	3/27/2019	TF	P66812	\$1,200.00
187197	RC HOBBS	403	3/27/2019	TF	P67654	\$800.00
19390	SULLY-MILLER CONTRACTING CO.	2004	3/8/2019	TF	P66161	\$500.00
187774	TAYLOR TOURS LLC.	13 CCR 2485	3/27/2019	TF	P66809	\$1,200.00
62986	TTM TECHNOLOGIES INC	203(b)	3/8/2019	TF	P64092	\$7,200.00
Total MSPAP Settlements: \$21,890.00						

Fac ID	Company Name	Rule Number	Settled Date	Init	Notice Nbr	Total Settlement
Hearing Board Settlements						
118389	ARCO AM/PM, NYGREN/CARR PROPERTIES,INC	203 461 H&S 41960.2	3/19/2019	NAS	6130-1	\$4,000.00
104234	MISSION FOODS CORPORATION	202 203(b) 1153.1 1303	3/7/2019	KCM	5400-4	\$15,000.00
117807	SERFAS SERVICE STN/ARCO #81851	461 H&S 41960.2	3/14/2019	NAS	6129-1	\$5,000.00

Total Hearing Board Settlements: \$24,000.00

**DISTRICT'S RULES AND REGULATIONS INDEX
FOR MARCH 2019 PENALTY REPORT**

REGULATION II - PERMITS

- Rule 201 Permit to Construct
- Rule 202 Temporary Permit to Operate
- Rule 203 Permit to Operate
- Rule 218 Continuous Emission Monitoring
- Rule 222 Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II

REGULATION IV - PROHIBITIONS

- Rule 403 Fugitive Dust - Pertains to solid particulate matter emitted from man-made activities
- Rule 461 Gasoline Transfer and Dispensing

REGULATION XI - SOURCE SPECIFIC STANDARDS

- Rule 1153.1 Emissions of Oxides of Nitrogen from Commercial Food Ovens
- Rule 1176 Sumps and Wastewater Separators

REGULATION XIII - NEW SOURCE REVIEW

- Rule 1303 Requirements

REGULATION XIV - TOXICS

- Rule 1415 Reduction of Refrigerant Emissions from Stationary Refrigeration and Air Conditioning Systems
- Rule 1421 Control of Perchloroethylene Emissions from Dry Cleaning Operations

REGULATION XX - REGIONAL CLEAN AIR INCENTIVES MARKET (RECLAIM)

- Rule 2004 RECLAIM Program Requirements
- Rule 2012 Requirements for Monitoring, Reporting, and Recordkeeping for Oxides of Nitrogen (NO_x) Emissions
- Appendix A
 - Rule 2012 Protocol for Monitoring, Reporting, and Recordkeeping for Oxides of Nitrogen (NO_x) Emissions

REGULATION XXX - TITLE V PERMITS

- Rule 3002 Requirements for Title V Permits
- Rule 3003 Applications
- Rule 3004 Permit Types and Content

CALIFORNIA HEALTH AND SAFETY CODE

- 41960 Certification of Gasoline Vapor Recovery System
- 41960.2 Gasoline Vapor Recovery

CALIFORNIA CODE OF REGULATIONS

- 13 CCR 2485 Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling



South Coast Air Quality Management District

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Twelve-Month and Three-Month Rolling Average Price of Compliance Years 2018 and 2019 NOx and SOx RTCs

April 2019 Quarterly Report to Stationary Source Committee

Table I

Twelve-Month Rolling Average Price Data for Compliance Year 2018 NOx RTCs
(Report to Governing Board if rolling average price greater than \$22,500/ton)

Twelve-Month Rolling Average Price Data for Compliance Year 2018 NOx RTC					
Reporting Month	12-Month Period	Total Volume Traded with Price During Past 12-month (tons)	Total Price of Volume Traded During Past 12-month (\$)	Number of Trades with Price	Rolling Average Price ¹ (\$/ton)
Jan-18	Jan-17 to Dec-17	91.6	\$974,592	3	\$10,639
Feb-18	Feb-17 to Jan-18	91.6	\$974,592	3	\$10,639
Mar-18	Mar-17 to Feb-18	100.7	\$1,041,091	4	\$10,337
Apr-18	Apr-17 to Mar-18	51.6	\$497,246	5	\$9,643
May-18	May-17 to Apr-18	56.6	\$527,075	8	\$9,320
Jun-18	Jun-17 to May-18	53.1	\$502,575	7	\$9,473
Jul-18	Jul-17 to Jun-18	72.6	\$625,883	14	\$8,618
Aug-18	Aug-17 to Jul-18	80.0	\$660,279	19	\$8,251
Sep-18	Sep-17 to Aug-18	86.8	\$698,621	28	\$8,050
Oct-18	Oct-17 to Sep-18	104.3	\$759,871	29	\$7,287
Nov-18	Nov-17 to Oct-18	196.3	\$1,069,361	47	\$5,447
Dec-18	Dec-17 to Nov-18	167.5	\$706,811	49	\$4,219
Jan-19	Jan-18 to Dec-18	270.4	\$1,023,944	57	\$3,786
Feb-19	Feb-18 to Jan-19	521.6	\$1,460,268	87	\$2,800
Mar-19	Mar-18 to Feb-19	625.6	\$1,534,266	97	\$2,452
Apr-19	Apr-18 to Mar-19	636.4	\$1,581,537	98	\$2,485

1. District Rule 2015(b)(6) - Backstop Provisions provides additional "evaluation and review of the compliance and enforcement aspects of the RECLAIM program" if the average RTC price exceeds \$15,000 per ton.

Table II

Twelve-Month Rolling Average Price Data for Compliance Year 2019 NOx RTCs
(Report to Governing Board if rolling average price greater than \$22,500/ton)

Twelve-Month Rolling Average Price Data for Compliance Year 2019 NOx RTC					
Reporting Month	12-Month Period	Total Volume Traded with Price During Past 12-month (tons)	Total Price of Volume Traded During Past 12-month (\$)	Number of Trades with Price	Rolling Average Price¹ (\$/ton)
Jan-19	Jan-18 to Dec-18	18.2	\$103,000	5	\$5,646
Feb-19	Feb-18 to Jan-19	19.0	\$108,200	6	\$5,682
Mar-19	Mar-18 to Feb-19	19.0	\$108,200	6	\$5,682
Apr-19	Apr-18 to Mar-19	29.6	\$181,921	8	\$6,153

1. District Rule 2015(b)(6) - Backstop Provisions provides additional "evaluation and review of the compliance and enforcement aspects of the RECLAIM program" if the average RTC price exceeds \$15,000 per ton.

Table III

Three-Month Rolling Average Price Data for Compliance Year 2018 NOx RTCs
 (Report to Governing Board if rolling average price greater than \$35,000/ton)

Three-Month Rolling Average Price Data for Compliance Year 2018 NOx RTC					
Reporting Month	3-Month Period	Total Volume Traded with Price During Past 3-month (tons)	Total Price of Volume Traded During Past 3-month (\$)	Number of Trades with Price	Rolling Average Price (\$/ton)
Jan-18	Oct-17 to Dec-17	38.1	\$400,092	1	\$10,500
Feb-18	Nov-17 to Jan-18	38.1	\$400,092	1	\$10,500
Mar-18	Dec-17 to Feb-18	9.1	\$66,499	1	\$7,300
Apr-18	Jan-18 to Mar-18	10.0	\$72,654	3	\$7,295
May-18	Feb-18 to Apr-18	15.0	\$102,483	6	\$6,855
Jun-18	Mar-18 to May-18	5.8	\$35,984	5	\$6,160
Jul-18	Apr-18 to Jun-18	24.6	\$153,137	10	\$6,235
Aug-18	May-18 to Jul-18	27.0	\$157,704	12	\$5,848
Sep-18	Jun-18 to Aug-18	33.7	\$196,046	21	\$5,813
Oct-18	Jul-18 to Sep-18	31.7	\$133,988	15	\$4,233
Nov-18	Aug-18 to Oct-18	116.3	\$409,081	28	\$3,517
Dec-18	Sep-18 to Nov-18	118.9	\$408,282	22	\$3,435
Jan-19	Oct-18 to Dec-18	204.3	\$664,165	29	\$3,251
Feb-19	Nov-18 to Jan-19	363.4	\$790,999	41	\$2,177
Mar-19	Dec-18 to Feb-19	467.2	\$893,954	49	\$1,914
Apr-19	Jan-19 to Mar-19	375.9	\$630,248	44	\$1,677

Table IV

Three-Month Rolling Average Price Data for Compliance Year 2019 NOx RTCs
(Report to Governing Board if rolling average price greater than \$35,000/ton)

Three-Month Rolling Average Price Data for Compliance Year 2019 NOx RTC					
Reporting Month	3-Month Period	Total Volume Traded with Price During Past 3-month (tons)	Total Price of Volume Traded During Past 3-month (\$)	Number of Trades with Price	Rolling Average Price (\$/ton)
Jan-19	Oct-18 to Dec-18	18.2	\$102,300	4	\$5,621
Feb-19	Nov-18 to Jan-19	19.0	\$107,500	5	\$5,658
Mar-19	Dec-18 to Feb-19	14.0	\$80,000	4	\$5,714
Apr-19	Jan-19 to Mar-19	11.3	\$78,922	3	\$6,969

Please Note:

Table listing "Twelve-Month Rolling Average Price Data for Infinite-Year Block NOx RTCs" is removed pursuant to October 5, 2018 amendment to Rule 2002, which eliminated the requirement to calculate infinite-year block NOx RTC prices and report to the Governing Board if prices fall below \$200,000 per ton.

Table V

Twelve-Month Rolling Average Price Data for Compliance Year 2018 SOx RTCs
 (Report to Governing Board if rolling average price greater than \$50,000/ton)

Twelve-Month Rolling Average Price Data for Compliance Year 2018 SOx RTC					
Reporting Month	12-Month Period	Total Volume Traded with Price During Past 12-month (tons)	Total Price of Volume Traded During Past 12-month (\$)	Number of Trades with Price	Rolling Average Price¹ (\$/ton)
Jan-18	Jan-17 to Dec-17	None	-	-	-
Feb-18	Feb-17 to Jan-18	None	-	-	-
Mar-18	Mar-17 to Feb-18	None	-	-	-
Apr-18	Apr-17 to Mar-18	None	-	-	-
May-18	May-17 to Apr-18	None	-	-	-
Jun-18	Jun-17 to May-18	34.2	\$23,974	3	\$700
Jul-18	Jul-17 to Jun-18	34.2	\$23,974	3	\$700
Aug-18	Aug-17 to Jul-18	80.2	\$57,354	5	\$715
Sep-18	Sep-17 to Aug-18	95.2	\$67,854	6	\$713
Oct-18	Oct-17 to Sep-18	163.3	\$135,429	10	\$829
Nov-18	Nov-17 to Oct-18	173.3	\$165,429	11	\$955
Dec-18	Dec-17 to Nov-18	173.3	\$165,429	11	\$955
Jan-19	Jan-18 to Dec-18	173.3	\$165,429	11	\$955
Feb-19	Feb-18 to Jan-19	218.3	\$209,829	14	\$961
Mar-19	Mar-18 to Feb-19	259.7	\$292,629	16	\$1,127
Apr-19	Apr-18 to Mar-19	259.7	\$292,629	16	\$1,127

1. District Rule 2015(b)(6) - Backstop Provisions provides additional "evaluation and review of the compliance and enforcement aspects of the RECLAIM program" if the average RTC price exceeds \$15,000 per ton.

Table VI

Twelve-Month Rolling Average Price Data for Compliance Year 2019 SOx RTCs
(Report to Governing Board if rolling average price greater than \$50,000/ton)

Twelve-Month Rolling Average Price Data for Compliance Year 2019 SOx RTC					
Reporting Month	12-Month Period	Total Volume Traded with Price During Past 12-month (tons)	Total Price of Volume Traded During Past 12-month (\$)	Number of Trades with Price	Rolling Average Price¹ (\$/ton)
Jan-19	Jan-18 to Dec-18	None	-	-	-
Feb-19	Feb-18 to Jan-19	None	-	-	-
Mar-19	Mar-18 to Feb-19	25.0	\$50,000	1	\$2,000
Apr-19	Feb-18 to Jan-20	25.0	\$50,000	1	\$2,000

1. District Rule 2015(b)(6) - Backstop Provisions provides additional "evaluation and review of the compliance and enforcement aspects of the RECLAIM program" if the average RTC price exceeds \$15,000 per ton.