

BOARD MEETING DATE: August 5, 2022

AGENDA NO. 19

REPORT: Stationary Source Committee

SYNOPSIS: The Stationary Source Committee held a meeting remotely on Friday, June 17, 2022. The following is a summary of the meeting.

RECOMMENDED ACTION:
Receive and file.

Ben J. Benoit, Chair
Stationary Source Committee

JA:JW:cr

Committee Members

Present: Mayor Ben J. Benoit (Chair)
Supervisor Sheila Kuehl (Vice Chair)
Senator Vanessa Delgado (Ret.)
Supervisor Janice Rutherford

Absent: Board Member Veronica Padilla-Campos
Vice Mayor Rex Richardson

Call to Order

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

Chair Benoit asked the Committee to take Item #2 out of order.

For additional information of the Stationary Source Committee Meeting, please refer to the Webcast at: [Webcast](#)

Informational Item:

2. Determine That Proposed Amendments to BACT Guidelines Are Exempt from CEQA and Amend BACT Guidelines

Bhaskar Chandan, Senior Engineering Manager/Engineering and Permitting, presented the proposed updates to South Coast AQMD BACT Guidelines. For additional details, please refer to the [Webcast](#) beginning at 4:15.

Casey Corliss, Orange County Waste & Recycling, commented on the Tier 4 Internal Combustion (IC) engines BACT determination and how a delay in obtaining permits

could penalize their facility. He suggested that applicants that submitted permit applications more than a year ago should be exempt from the new Lowest Achievable Emission Rate requirements for emergency diesel engines ≥ 1000 BHP, and recommended staff delay this item. For additional details, please refer to the [Webcast](#) beginning at 11:33.

Mark Abramowitz, Community Environmental Services, indicated that the proposed Tier 4 diesel engine as BACT violated South Coast AQMD's Clean Fuels Policy. He questioned why South Coast AQMD is proposing a diesel engine as BACT when zero emission technologies are available. He urged the Committee to ask the staff to come back with BACT Guidelines that provides for zero emission technologies. He further stated that the implication of Rule 222 creates a policy disincentive since zero emission technologies are exempt from permitting and such technologies are not considered for BACT guidelines. For additional details, please refer to the [Webcast](#) beginning at 13:59.

Stephen Jepsen, Southern California Alliance of Publicly Owned Treatment Works, stated that their sector is an essential public wastewater service, and they must maintain flow, which requires extreme varying loads and makes it challenging to use either fuel cell or battery backup options. He indicated U.S. EPA certified Tier 4 engines have an inducement feature which is extremely problematic for their sector. However, U.S. EPA compliant generators have the same emissions just not an inducement feature. He appreciated the BACT team's approach and looks forward to further discussions on how to implement compliant generators for their sector with practical testing requirements. For additional details, please refer to the [Webcast](#) beginning at 16:41.

David Pettit, Natural Resources Defense Council, commented on the absence of an analysis of zero emission modalities in the proposed amended BACT Guidelines. He mentioned that in every BACT analysis staff needs to look at whether there are zero emission possibilities and whether those meet the BACT criteria before taking the proposed BACT Guidelines to the Board. For additional details, please refer to the [Webcast](#) beginning at 19:40.

Harvey Eder, Public Solar Power Coalition, indicated that he has been talking about BACT and BARCT technologies for years and the need to consider alternate control technologies, such as solar technology. For additional details, please refer to the [Webcast](#) beginning at 20:43.

Jason Aspell, Deputy Executive Officer/Engineering and Permitting, explained that the NSR regulation requires staff to update the BACT Guidelines and it includes a listing for commonly permitted equipment. He provided background about South Coast AQMD's Clean Fuel Policy and highlighted that for non-emergency engines

South Coast AQMD is more stringent on emission standards. For additional details, please refer to the [Webcast](#) beginning at 24:07.

Susan Nakamura, Chief Operating Officer, provided background information about measures in the 2022 AQMP that refer to diesel engines and the replacement effort to go to zero emissions. Through regulatory efforts, staff will look at moving diesel engines to zero emission technologies. She referred to the recently adopted South Los Angeles Community Emissions Reduction Plan which includes an education measure to inform applicants zero emission options which may not require permits. For additional details, please refer to the [Webcast](#) beginning at 25:31.

Supervisor Rutherford asked about the staff strategy to facilitate creative solutions and technologies to reduce emissions. She referred to the Catalina Island project and discussion on exploring non-diesel options such as the linear generators. For additional details, please refer to the [Webcast](#) beginning at 28:05.

Mr. Aspell explained that the Catalina engines are non-emergency prime engines using diesel fuel due to the constraints at the site. However, diesel-fueled prime engines are rare. Under our Clean Fuel Policy, other fuels can be used, but there are limitations such as cell towers or remote areas, where diesel is utilized because it is the only viable option. For additional details, please refer to the [Webcast](#) beginning at 28:23.

Wayne Natri, Executive Officer, stated the importance of the distinction between the policy aspect and the regulatory aspect. Staff has a stronger hand to play on the regulatory aspect. BACT, LAER, and NSR are difficult concepts to grasp. He committed to additional outreach with Mr. Abramowitz, Mr. Pettit and others to make sure they fully understand our approach. For additional details, please refer to the [Webcast](#) beginning at 30:54.

Pippin Mader, CARB, expressed support for the Proposed Amendments to the BACT Guidelines, Tier 4 based on other installations in the state and nation and being achieved in practice. He also indicated support for zero emissions technologies where feasible. For additional details, please refer to the [Webcast](#) beginning at 32:03.

Action Item:

1. Revised Financial Incentive Program to Reduce Hexavalent Chromium Facilities

Michael Laybourn, Program Supervisor/Planning, Rule Development and Implementation, presented a summary of an updated financial incentive program for hexavalent chromium plating and anodizing facilities to transition operations to trivalent chromium or another less toxic alternative to hexavalent chromium. For additional details, please refer to the [Webcast](#) beginning at 33:30.

Jerry Desmond, Metal Finishing Association of Southern California, recognized the good intentions of the updated financial incentive program. He expressed concern about CARB's draft Chrome Plating Air Toxic Control Measure that proposes a phase out of hexavalent chromium in plating and anodizing operations. He commented that the incentive program may not be successful due to uncertainty in customer demand and acceptance of non-hexavalent chromium metal finishing products. He also explained that facilities may have difficulty conducting business as usual while implementing a project to transition to a non-hexavalent chromium process. For additional details, please refer to the [Webcast](#) beginning at 39:21.

Supervisor Rutherford requested clarification about how unused funds would be allocated. Michael Krause, Assistant Deputy Executive Officer/Planning, Rule Development and Implementation, stated that undispersed funds will be used for mobile source emission reduction projects. Ms. Nakamura further explained that there is a limited amount of time to spend the incentive funds and any leftover funds can be utilized quickly for mobile source projects. For additional details, please refer to the [Webcast](#) beginning at 42:49.

Moved by Kuehl; seconded by Benoit, unanimously approved.

Ayes: Benoit, Delgado, Kuehl, Rutherford

Noes: None

Absent: Padilla-Campos, Richardson

Informational Items:

3. Update on Rule 2015 – Backstop Provisions NO_x RECLAIM Trading Credit (RTC) Price Threshold Exceedance

Jason Aspell, Deputy Executive Officer/Engineering and Permitting provided an update on the assessment of the NO_x RECLAIM program required by Rule 2015 – Backstop Provisions. Rule 2015 requires an evaluation and review of the compliance and enforcement aspects of the RECLAIM program following a determination that RTC prices exceed \$15,000 per ton. Based on staff's preliminary assessment, staff is recommending no changes to the NO_x RECLAIM program. There were no committee or public comments. For additional details, please refer to the [Webcast](#) beginning at 47:13.

4. Summary of Proposed Amended Rule 218.2 – Continuous Emission Monitoring System: General Provisions; and Proposed Amended Rule 218.3 – Continuous Emission Monitoring System: Performance Specifications

Michael Krause, Assistant Deputy Executive Officer/Planning, Rule Development and Implementation, presented a summary of Proposed Amended Rules 218.2 and 218.3 that proposes to add provisions to reflect recently adopted rules for the RECLAIM transition and to clarify recertification and data requirements for the installation and operation of continuous emission monitoring systems. There were no

committee or public comments. For additional details, please refer to the [Webcast](#) beginning at 53:46.

5. Summary of Proposed Amended Rule 429 – Startup and Shutdown Provisions for Oxides and Nitrogen

Michael Morris, Planning and Rules Manager/Planning, Rule Development and Implementation, presented a summary of Proposed Amended Rule 429 which proposes to expand the applicability, provide an exemption from NO_x and CO concentration limits during startup and shutdown, and include best management practices, provisions limiting the frequency of scheduled startups, and notification and recordkeeping requirements. There were no committee or public comments. For additional details, please refer to the [Webcast](#) beginning at 58:28.

6. Ultraviolet, Electron Beam, or Light-Emitting Diode (UV/EB/LED) Update

Michael Krause, Assistant Deputy Executive Officer/Planning, Rule Development and Implementation, presented information on UV/EB/LED technology, an update on a request for U.S. EPA guidance on thin film test methods, and in response to a January 2022 Board directive, an update on potential amendments to Rule 219 – Equipment Not Requiring a Written Permit Pursuant Regulation II for UV/EB/LED technologies. For additional details, please refer to the [Webcast](#) beginning at 1:02:18.

Chair Benoit expressed support for expediting discussions with U.S. EPA, and Mr. Nastri offered to speak with the U.S. EPA regional administrator.

Cara Bommarito, Rita Loof, Radtech International, and Esteban Marin, Heraeus Noblelight expressed support for an exemption from permit modification for UV/EB/LED applications for coatings with less than 50 g/L of VOCs. In addition, Ms. Loof and Mr. Marin commented that proposed amendments to Rule 219 should be brought to the Board sooner than the first quarter of 2023. Ms. Loof stated that the Rule 219 amendment process does not need to wait for a response from U.S. EPA regarding an acceptable thin film test method to determine VOC compliance. For additional details, please refer to the [Webcast](#) beginning at 1:13:00.

Sarah Rees, Deputy Executive Officer/Planning, Rule Development and Implementation, affirmed South Coast AQMD's support for low emission technologies and committed to continue working with stakeholders. She added that some UV/EB/LED materials have a high VOC content and providing an exemption could lead to emissions increases. For additional details, please refer to the [Webcast](#) beginning at 1:22:30.

7. 2021 Annual Report on AB 2588 Program

Eugene Kang, Planning and Rules Manager/Planning, Rule Development and Implementation, presented a summary of the 2021 AB 2588 Annual Report on the

AB 2588 Program. For additional details, please refer to the [Webcast](#) beginning at 1:24:25.

Supervisor Kuehl asked staff if there are concerns for worker safety at Sterigenics.

Mr. Nastri answered that CalOSHA has been notified of sampling results at the facility, and that staff is working closely with the agency to address the onsite worker conditions. For additional details, please refer to the [Webcast](#) beginning at 1:33:42.

WRITTEN REPORTS:

8. Notice of Violation Penalty Summary

The report was acknowledged by the committee.

9. Twelve-month and Three-month Rolling Average Price of Compliance Years 2021 and 2022 NO_x and SO_x RTCs (April – May 2022)

The report was acknowledged by the committee.

10. Monthly Update of Staff’s Work with U.S. EPA and CARB 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.

OTHER MATTERS:

11. Other Business

There was no other business to report.

12. Public Comment Period

There was no public comment to report

13. Next Meeting Date

The next Stationary Source Committee meeting is scheduled for Friday, August 19, 2022 at 10:30 a.m.

Adjournment

The meeting was adjourned at 12:04 p.m.

Attachments

1. Attendance Record
2. Notice of Violation Penalty Summary
3. Twelve-month and Three-month Rolling Average Price of Compliance Years 2021 and 2022 NO_x and SO_x RTCs (April – May 2022)
4. Monthly Update of Staff’s Work with U.S. EPA and CARB on New Source Review Issues for the Transition of RECLAIM Facilities to a Command-and-Control Regulatory Program

ATTACHMENT 1

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

Attendance –June 17, 2022

Mayor Ben J. Benoit	South Coast AQMD Board
Senator Delgado (Ret.).....	South Coast AQMD Board
Supervisor Sheila Kuehl.....	South Coast AQMD Board
Supervisor Janice Rutherford	South Coast AQMD Board
Ruthanne Taylor Berger.....	Board Consultant (Benoit)
Tom Gross	Board Consultant (Benoit)
Debra Mendelsohn.....	Board Consultant (Rutherford)
Amy Wong	Board Consultant (Padilla-Campos)
Mark Abramowitz.....	Community Environmental Services
Cara Bommarito	RadTech International
Casey Corliss	OC Waste & Recycling
Ramine Cromartie.....	WSPA
Harvey Eder.....	Public Solar Power Coalition
Stephen Jepsen.....	SCAP
Bill Lamarr	California Small Business Alliance
Rita Loof	RadTech International
Pippen Mader	CARB
Esteban Mann	Heraeus Noblelight
Dan McGivney	SoCalGas
Craig Sakamoto	PBF
Alison Torres.....	SCAP
Scott Weaver	Ramboll
Peter Whittingham.....	Whittingham Public Affairs Advisors
Derrick Alatorre.....	South Coast AQMD staff
Jason Aspell.....	South Coast AQMD staff
Barbara Baird	South Coast AQMD staff
Bhaskar Chandan	South Coast AQMD staff
Sheri Hanizavareh.....	South Coast AQMD staff
Anissa Heard-Johnson	South Coast AQMD staff
Mark Henninger.....	South Coast AQMD staff
Kathryn Higgins	South Coast AQMD staff
Eugene Kang	South Coast AQMD staff
Aaron Katzenstein	South Coast AQMD staff
Michael Krause.....	South Coast AQMD staff
Michael Laybourn.....	South Coast AQMD staff
Jason Low.....	South Coast AQMD staff
Ian MacMillan	South Coast AQMD staff
Michael Morris	South Coast AQMD staff
Ron Moskowitz	South Coast AQMD staff
Susan Nakamura.....	South Coast AQMD staff
Wayne Nastri.....	South Coast AQMD staff
Sarah Rees	South Coast AQMD staff
Jillian Wong	South Coast AQMD staff
Paul Wright	South Coast AQMD staff
Victor Yip.....	South Coast AQMD staff

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

Settlement Penalty Report (05/01/2022 - 05/31/2022)

Total Penalties

Civil Settlement: \$66,200.00
Criminal Referral Settlement: \$10,698.56
MSPAP Settlement: \$4,060.00

Total Cash Settlements: \$80,958.56

Fiscal Year through 05/31/2022 Cash Total: \$4,634,309.01

Fac ID	Company Name	Rule Number	Settled Date	Init	Notice Nbrs	Total Settlement
Civil						
117290	B BRAUN MEDICAL, INC	2004, 2012, 3002(c)(1)	05/04/2022	DH	P68314, P68327	\$17,000.00
165786	CHASE AUTO BODY, INC.	203(b)	05/26/2022	RL	P65589	\$200.00
550	LA CO., INTERNAL SERVICE DEPT	2004, 2012, 2012 Appendix A, 3002(C)(1)	05/26/2022	DH	P57896, P70004, P70007, P70011, P70015	\$49,000.00
Total Civil Settlements: \$66,200.00						
Criminal						
190083	QUAKER 5, LP	1403, 40 CFR 61.145	05/18/2022	GV	P67474, P67475	\$10,698.56
Total Criminal Referral Settlements: \$10,698.56						
MSPAP						
169625	BROSKI'S BODY & PAINT	203(b), 1151	05/10/2022	GC	P65898	\$800.00
136077	CLEAN AIR TESTING, INC	461	05/18/2022	GC	P70359	\$600.00
176674	DEEP KB ENTERPRISE, INC.	461, H&S 41960.2	05/18/2022	GC	P69016	\$300.00
161334	GASCO	461	05/10/2022	GC	P68136	\$500.00
189670	KIDDY TYME	1403, 40 CFR 61,145	05/10/2022	GC	P67440	\$960.00
188795	RAY'S PAVING SOLUTIONS	403(d)(2)	05/10/2022	TCF	P68603, P68604	\$900.00
Total MSPAP Settlements: \$4,060.00						

**SOUTH COAST AQMD'S RULES AND REGULATIONS INDEX
FOR MAY 2022 PENALTY REPORT**

REGULATION II - PERMITS

Rule 203 Permit to Operate

REGULATION IV - PROHIBITIONS

Rule 403 Fugitive Dust

Rule 461 Gasoline Transfer and Dispensing

REGULATION XI - SOURCE SPECIFIC STANDARDS

Rule 1151 Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations

REGULATION XIV - TOXICS

Rule 1403 Asbestos Emissions from Demolition/Renovation Activities

REGULATION XX - REGIONAL CLEAN AIR INCENTIVES MARKET (RECLAIM)

Rule 2004 Requirements

Rule 2012 Requirements for Monitoring, Reporting, and Recordkeeping for Oxides of Nitrogen (NOx) Emissions

Appendix A Protocol for Monitoring, Reporting, and Recordkeeping for Oxides of Nitrogen (NOx) Emissions

Rule 2012

REGULATION XXX - TITLE V PERMITS

Rule 3002 Requirements

CALIFORNIA HEALTH AND SAFETY CODE

41960.2 Gasoline Vapor Recovery

CODE OF FEDERAL REGULATIONS

40 CFR 61.145 Standard for Demolition and Renovation



South Coast Air Quality Management District

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Twelve-Month and Three-Month Rolling Average Price of Compliance Years 2021 and 2022 NOx and SOx RTCs (April – May 2022)

June 2022 Report to Stationary Source Committee

Table I

Twelve-Month Rolling Average Price Data for Compliance Year 2021 NOx RTCs
(Report to Governing Board if rolling average price greater than \$22,500/ton)

Twelve-Month Rolling Average Price Data for Compliance Year 2021 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-21	Jan-20 to Dec-20	76.2	\$717,162	15	\$9,418
Feb-21	Feb-20 to Jan-21	77.6	\$736,204	16	\$9,488
Mar-21	Mar-20 to Feb-21	71.7	\$667,889	15	\$9,321
Apr-21	Apr-20 to Mar-21	69.6	\$656,731	13	\$9,439
May-21	May-20 to Apr-21	73.6	\$917,864	12	\$12,470
Jun-21	Jun-20 to May-21	43.3	\$630,190	10	\$14,545
Jul-21	Jul-20 to Jun-21	134.1	\$2,265,703	20	\$16,898
Aug-21	Aug-20 to Jul-21	131.1	\$2,238,560	23	\$17,072
Sep-21	Sep-20 to Aug-21	204.7	\$3,499,147	31	\$17,091
Oct-21	Oct-20 to Sep-21	210.0	\$3,664,844	33	\$17,455
Nov-21	Nov-20 to Oct-21	309.8	\$5,429,848	55	\$17,529
Dec-21	Dec-20 to Nov-21	310.0	\$5,432,348	54	\$17,523
Jan-22	Jan-21 to Dec-21	368.1	\$6,937,025	64	\$18,846
Feb-22	Feb-21 to Jan-22	548.8	\$8,783,951	91	\$16,007
Mar-22	Mar-21 to Feb-22	601.1	\$9,116,953	103	\$15,166
Apr-22	Apr-21 to Mar-22	680.8	\$12,274,023	107	\$18,028
May-22	May-21 to Apr-22	704.4	\$13,127,083	123	\$18,635
Jun-22	Jun-21 to May-22	705.6	\$13,157,558	124	\$18,647

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 annual RTC price exceeds \$15,000 per ton. The average annual RTC price is reported to the Board in the Annual RECLAIM Audit Report in March of each year.

Table II

Twelve-Month Rolling Average Price Data for Compliance Year 2022 NOx RTCs
(Report to Governing Board if rolling average price greater than \$22,500/ton)

Twelve-Month Rolling Average Price Data for Compliance Year 2022 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-22	Jan-21 to Dec-21	165.4	\$5,473,709	18	\$33,085
Feb-22	Feb-21 to Jan-22	165.4	\$5,473,709	18	\$33,085
Mar-22	Mar-21 to Feb-22	165.4	\$5,473,709	18	\$33,085
Apr-22	Apr-21 to Mar-22	193.6	\$6,611,522	22	\$34,146
May-22	May-21 to Apr-22	194.6	\$6,656,124	24	\$34,198
Jun-22	Jun-21 to May-22	176.4	\$6,227,716	22	\$35,311

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 annual RTC price exceeds \$15,000 per ton. The average annual RTC price is reported to the Board in the Annual RECLAIM Audit Report in March of each year.

Table III

Three-Month Rolling Average Price Data for Compliance Year 2021 NOx RTCs
(Report to Governing Board if rolling average price greater than \$35,000/ton)

Three-Month Rolling Average Price Data for Compliance Year 2021 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-21	Oct-20 to Dec-20	1.3	\$16,750	3	\$13,400
Feb-21	Nov-20 to Jan-21	2.9	\$38,049	5	\$13,218
Mar-21	Dec-20 to Feb-21	2.1	\$26,049	3	\$12,238
Apr-21	Jan-21 to Mar-21	1.6	\$21,299	2	\$13,079
May-21	Feb-21 to Apr-21	32.4	\$482,253	3	\$14,900
Jun-21	Mar-21 to May-21	32.4	\$482,253	3	\$14,900
Jul-21	Apr-21 to Jun-21	123.1	\$2,117,767	13	\$17,201
Aug-21	May-21 to Jul-21	95.9	\$1,718,259	15	\$17,921
Sep-21	Jun-21 to Aug-21	169.5	\$2,978,846	23	\$17,575
Oct-21	Jul-21 to Sep-21	84.0	\$1,509,029	15	\$17,974
Nov-21	Aug-21 to Oct-21	178.6	\$3,191,288	32	\$17,865
Dec-21	Sep-21 to Nov-21	106.0	\$1,945,201	25	\$18,346
Jan-22	Oct-21 to Dec-21	159.4	\$3,288,931	34	\$20,636
Feb-22	Nov-21 to Jan-22	241.9	\$3,392,151	41	\$14,024
Mar-22	Dec-21 to Feb-22	293.3	\$3,710,654	52	\$12,653

Three-Month Rolling Average Price Data for Compliance Year 2021 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)
Apr-22	Jan-22 to Mar-22	314.4	\$5,358,297	45	\$17,045
May-22	Feb-22 to Apr-22	188.1	\$4,825,385	35	\$25,659
Jun-22	Mar-22 to May-22	136.8	\$4,522,857	24	\$33,056

Table IV

Three-Month Rolling Average Price Data for Compliance Year 2022 NOx RTCs
(Report to Governing Board if rolling average price greater than \$35,000/ton)

Three-Month Rolling Average Price Data for Compliance Year 2022 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-22	Oct-21 to Dec-21	97.4	\$3,780,324	10	\$38,803
Feb-22	Nov-21 to Jan-22	79.5	\$3,110,524	7	\$39,114
Mar-22	Dec-21 to Feb-22	29.5	\$1,110,524	5	\$37,614
Apr-22	Jan-22 to Mar-22	28.2	\$1,137,813	4	\$40,372
May-22	Feb-22 to Apr-22	29.2	\$1,182,415	6	\$40,506
Jun-22	Mar-22 to May-22	29.2	\$1,182,415	6	\$40,506

Table V

Twelve-Month Rolling Average Price Data for Compliance Year 2021 SOx RTCs
(Report to Governing Board if rolling average price greater than \$50,000/ton)

Twelve-Month Rolling Average Price Data for Compliance Year 2021 SOx RTC ¹					
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 ² (\$/ton)
Jan-21	Jan-20 to Dec-20	None	-	-	-
Feb-21	Feb-20 to Jan-21	None	-	-	-
Mar-21	Mar-20 to Feb-21	None	-	-	-
Apr-21	Apr-20 to Mar-21	None	-	-	-
May-21	May-20 to Apr-21	None	-	-	-
Jun-21	Jun-20 to May-21	None	-	-	-
Jul-21	Jul-20 to Jun-21	None	-	-	-
Aug-21	Aug-20 to Jul-21	None	-	-	-
Sep-21	Sep-20 to Aug-21	None	-	-	-

Twelve-Month Rolling Average Price Data for Compliance Year 2021 SOx RTC¹					
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 Price² (\$/ton)
Oct-21	Oct-20 to Sep-21	None	-	-	-
Nov-21	Nov-20 to Oct-21	None	-	-	-
Dec-21	Dec-20 to Nov-21	None	-	-	-
Jan-22	Jan-21 to Dec-21	37.5	\$112,500	1	\$3,000
Feb-22	Feb-21 to Jan-22	37.5	\$112,500	1	\$3,000
Mar-22	Mar-21 to Feb-22	53.9	\$209,201	2	\$3,882
Apr-22	Apr-21 to Mar-22	53.9	\$209,201	2	\$3,882
May-22	May-21 to Apr-22	53.9	\$209,201	2	\$3,882
Jun-22	Jun-21 to May-22	53.9	\$209,201	2	\$3,882

1. Pursuant to District Rule 2002(f)(1)(Q), the requirement to report 12-month rolling average SOx RTC price ended February 1, 2020. This table is provided as a courtesy.
2. 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 annual RTC price exceeds \$15,000 per ton. The average annual RTC price is reported to the Board in the Annual RECLAIM Audit Report in March of each year.

Table VI

Twelve-Month Rolling Average Price Data for Compliance Year 2022 SOx RTCs
(Report to Governing Board if rolling average price greater than \$50,000/ton)

Twelve-Month Rolling Average Price Data for Compliance Year 2022 SOx RTC¹					
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 Price² (\$/ton)
Jan-22	Jan-21 to Dec-21	None	-	-	-
Feb-22	Feb-21 to Jan-22	None	-	-	-
Mar-22	Mar-21 to Feb-22	None	-	-	-
Apr-22	Apr-21 to Mar-22	None	-	-	-
May-22	May-21 to Apr-22	None	-	-	-
Jun-22	Jun-21 to May-22	None	-	-	-

1. Pursuant to District Rule 2002(f)(1)(Q), the requirement to report 12-month rolling average SOx RTC price ended February 1, 2020. This table is provided as a courtesy.
2. 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 annual RTC price exceeds \$15,000 per ton. The average annual RTC price is reported to the Board in the Annual RECLAIM Audit Report in March of each year.

June 2022 Update on Work with U.S. EPA and CARB on New Source Review Issues for the RECLAIM Transition

At the October 5, 2018 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. No new activities since the last report.