



South Coast Air Quality Management District

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

A G E N D A

HYBRID GOVERNING BOARD MEETING September 1, 2023

A meeting of the South Coast Air Quality Management District Board will be held at 9:00 a.m. on Friday, September 1, 2023 through a hybrid format of in-person attendance in the Dr. William A. Burke Auditorium at the South Coast AQMD Headquarters, 21865 Copley Drive, Diamond Bar, California, and/or virtual attendance via videoconferencing and by telephone. Please follow the instructions below to join the meeting remotely.

Please refer to South Coast AQMD’s website for information regarding the format of the meeting, updates, and details on how to participate at: <http://www.aqmd.gov/home/news-events/meeting-agendas-minutes>

<p>Electronic Participation Information (Instructions provided at the bottom of the agenda)</p>	<p>Join Zoom Meeting - from PC, Laptop or Phone https://scaqmd.zoom.us/j/93128605044 Meeting ID: 931 2860 5044 (applies to all) Teleconference Dial In +1 669 900 6833 or +1 253 215 8782 One tap mobile +16699006833,,93128605044# or +12532158782,,93128605044#</p> <p>Spanish Language Only Audience (telephone) Número Telefónico para la Audiencia que Habla Español Teleconference Dial In/Numero para llamar: +1 669 900 6833 Meeting ID/Identificación de la reunión: 932 0955 9643 One tap mobile: +16699006833,,93209559643#</p>
<p>Public Comment Will Still Be Taken</p>	<p>Audience will be allowed to provide public comment in person and through Zoom connection or telephone. Phone controls for participants: The following commands can be used on your phone’s dial pad while in meeting: *6 (Toggle mute/unmute); *9 - Raise hand</p>
<p>Questions About an Agenda Item</p>	<ul style="list-style-type: none"> ▪ 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.
<p>Meeting Procedures</p>	<ul style="list-style-type: none"> ▪ The public meeting of the South Coast AQMD Governing Board begins at 9:00 a.m. The Governing Board generally will consider items in the order listed on the agenda. However, <u>any item</u> may be considered in <u>any order</u>. ▪ 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.

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 South Coast AQMD's Clerk of the Boards Office, 21865 Copley Drive, Diamond Bar, CA 91765 or web page at www.aqmd.gov

Americans with Disabilities Act and Language Accessibility

Disability and language-related accommodations can be requested to allow participation in the Governing Board meeting. The agenda will be made available, upon request, in appropriate alternative formats to assist persons with a disability (Gov. Code Section 54954.2(a)). In addition, other documents may be requested in alternative formats and languages. Any disability or language-related accommodation must be requested as soon as practicable. Requests will be accommodated unless providing the accommodation would result in a fundamental alteration or undue burden to the South Coast AQMD. Please contact the Clerk of the Boards Office at (909) 396-2500 from 7:00 a.m. to 5:30 p.m., Tuesday through Friday, or send the request to cob@aqmd.gov.

A webcast of the meeting is available for viewing at:

<http://www.aqmd.gov/home/news-events/webcast>

CALL TO ORDER

- Pledge of Allegiance
- Roll Call
- Opening Comments: Vanessa Delgado, Chair
Other Board Members
Wayne Nastri, Executive Officer

Staff/Phone (909) 396-

PUBLIC COMMENT PERIOD – (Public Comment on Non-Agenda Items, Pursuant to Government Code Section 54954.3) The public may comment on any subject within the South Coast AQMD’s authority that does not appear on the agenda, during the Public Comment Period. Each speaker addressing non-agenda items may be limited to a total of (3) minutes.

CONSENT AND BOARD CALENDAR (Items 1 through 31)

Note: Consent and Board Calendar items held for discussion will be moved to Item No. 32

Items 1 through 4 – Action Items/No Fiscal Impact

1. Approve Minutes of August 4, 2023 **Thomas/3268**
2. Set Public Hearing October 6, 2023 to Consider **Nastri/3131**
Adoption of and/or Amendments to South Coast
AQMD Rules and Regulations:
 - Determine That Proposed Amended Rule 1405 – Control of **Krause/2706**
Ethylene Oxide Emissions from Sterilization and Related
Operations, Is Exempt from CEQA; and Amend Rule 1405

Proposed Amended Rule 1405 establishes new and enhanced control and monitoring requirements to further reduce stack and fugitive ethylene oxide emissions from sterilization operations. Proposed Amended Rule 1405 includes reporting, recordkeeping, and curtailment provisions. Proposed Amended Rule 1405 also includes inventory tracking, monitoring and reporting provisions for certain large warehouses receiving materials sterilized by ethylene oxide. This action is to adopt the Resolution: 1) Determining that Proposed Amended Rule 1405 – Control of Ethylene Oxide Emissions from Sterilization and Related Operations is exempt from the requirements of the California Environmental Quality Act; and 2) Amending Rule 1405 – Control of Ethylene Oxide Emissions from Sterilization and Related Operations. (Reviewed: Stationary Source Committee, April 21, June 16, and August 18, 2023)

3. Request Approval of Proposed Membership Roster for the AQMP Advisory Group

Rees/2856

Staff is recommending that membership be granted for the AQMP Advisory Group for a new four-year term. The current term for the AQMP Advisory Group is set to expire on September 5, 2023. The AQMP Advisory Group consists of representatives from environmental/community groups, government agencies, academia and businesses. The primary role of the AQMP Advisory Group is to review and provide recommendations to staff regarding the implementation of the 2022 AQMP and the development of SIPs aimed at demonstrating attainment of the National Ambient Air Quality Standards. In December 2002, the Blue Ribbon Panel developed recommendations for the AQMP Advisory Group, including the applicable Board Committee. The proposed action seeks to have revisions to the AQMP Advisory Group membership reviewed by the Mobile Source instead of Stationary Source Committee and to approve suggested membership roster for the AQMP Advisory Group. (Reviewed: Mobile Source, August 18, 2023; Recommended for Approval)

4. Request Approval of Proposed Membership Roster for Scientific, Technical and Modeling Peer Review Advisory Group

Rees/2856

Staff is recommending that membership be granted for the Scientific, Technical, and Modeling Peer Review (STMPR) Advisory Group for a new four-year term. The current term for this Advisory Group is set to expire on September 5, 2023. The STMPR Advisory Group comprises experts in the fields of air quality modeling, atmospheric chemistry and physics, socioeconomic modeling and public health. The primary role of this Advisory Group is to review scientific and technical approaches needed to develop a future AQMP/SIP aimed at demonstrating attainment of the National Ambient Air Quality Standards. In December 2002, the Blue Ribbon Panel developed recommendations for the STMPR Advisory Group, including the applicable Board Committee. The proposed action seeks to approve the suggested membership roster for the STMPR Advisory Group. (Reviewed: Mobile Source Committee, August 18, 2023; Recommended for Approval)

Items 5 through 16 – Budget/Fiscal Impact

5. Issue RFP and Execute Contracts for Clean Technology Truck Loaner Program Within Four AB 617 Communities

Katzenstein/2219

Through a participatory budgeting process, four Assembly Bill 617 (AB 617) Community Steering Committees prioritized \$16,590,000 of Community Air Protection Program (CAP) funds for a Clean Technology Truck Loaner Program. The four AB 617 communities include: 1) East Los Angeles, Boyle Heights, West Commerce;

2) San Bernardino, Muscoy; 3) Southeast Los Angeles; and 4) Wilmington, Carson, West Long Beach. The AB 617 Clean Technology Truck Loaner Program will allow truck owners and operators in these communities to rent zero-emission (ZE) trucks at a minimal cost. These actions are to: 1) issue an RFP to establish a list of eligible vendors to offer end-to-end short-term ZE truck rental services to owners and operators residing and operating in the four AB 617 communities; 2) authorize the Executive Officer to execute subsequent contracts with vendors to provide short-term rental services to eligible applicants participating in the AB 617 Clean Technology Truck Loaner Program in an amount not to exceed \$16,590,000 from the CAP AB 134 Fund (77); 3) reimburse the General Fund for administrative costs up to \$1,032,875 from the CAP AB 134 Fund (77) for staff time to implement the AB 617 Clean Technology Truck Loaner Program; and 4) transfer and appropriate up to \$4,000 from the administrative portion of CAP AB 134 Fund (77) into Technology Advancement's FY 2023-24 Budget, Services and Supplies Major Object, Public Notice and Advertisement account for administrative costs to implement the AB 617 Clean Technology Truck Loaner Program. (Reviewed: Technology Committee, August 18, 2023; Recommended for Approval)

6. Approve Additional Funding for Residential Electric Vehicle Charging Incentive Program

Katzenstein/2219

South Coast AQMD four-county jurisdiction. Staff is proposing to revise this program to focus solely on low-income residents while still providing the same \$500 rebate on a first come, first serve basis. This action is to request funding of up to \$200,000 from the Clean Fuels Program Fund (31) to continue the year-round Residential EV Charging Incentive Program. (Reviewed; Technology Committee, August 18 2023; Recommended for Approval)

7. Recognize Revenue, Appropriate Funds, Issue Solicitations and Purchase Orders for Air Monitoring Equipment

Low/2269

South Coast AQMD is expected to receive a Federal grant award up to \$655,042 from U.S. EPA under the Inflation Reduction Act. These actions are to: 1) recognize revenue and appropriate these funds into the Monitoring and Analysis and Compliance and Enforcement Divisions' FY 2023-24 and/or 2024-25 Budgets; and 2) issue solicitations and purchase orders for air monitoring equipment. (Reviewed: Administrative Committee, August 11, 2023; Recommended for Approval)

8. Transfer and Appropriate Funds for Air Monitoring Programs and Issue Purchase Order(s) for Two Vehicles **Low/2269**

South Coast AQMD previously received Federal grant awards from the Federal Government and U.S. EPA to continue implementing the Enhanced Particulate Monitoring and PAMS Programs, including funds for the purchase of new vehicles. However, additional funds are needed for the purchase of new zero-emission vehicles. These actions are to transfer funds up to \$91,766 from the Clean Fuels Program Fund to the Monitoring and Analysis Division FY 2023-24 Budget and authorize the Procurement Manager to issue solicitations and purchase order(s) for two zero-emission vehicles. (Reviewed: Technology Committee, August 18, 2023; Recommended for Approval)

9. Appropriate Funds, Issue Solicitations and Purchase Orders for Air Monitoring and Laboratory Equipment **Low/2269**

South Coast AQMD FY 2023-24 Annual Budget approved the purchase of air monitoring and laboratory equipment. This action is to appropriate additional funds, issue solicitations and purchase orders for air monitoring and laboratory equipment for supporting AB 617 community air monitoring and ethylene oxide measurement efforts. (Reviewed: Administrative Committee, August 11, 2023; Recommended for Approval)

10. Transfer and Appropriate Funds for Independent Audit of Rule 1180 Fenceline Air Monitoring Network **Low/2269**

Rule 1180 mandates the implementation of real-time observations of air quality at or near the fenceline of all major refineries in the Basin, and in nearby communities. In June 2018, the Board created the Rule 1180 Special Revenue Fund (78) to establish community air monitoring near refineries. FY 2023-24 Budget for this program is approximately \$4.6 million in annual fees from refineries for community air monitoring. These actions are to transfer and appropriate \$700,000 from the Rule 1180 Special Revenue Fund (78), and appropriate \$500,000 from the General Fund Undesignated (Unassigned) Fund Balance to Monitoring and Analysis' FY 2023-24 Budget for an independent audit of the Rule 1180 fenceline air monitoring network. (Reviewed: Administrative Committee, August 11, 2023; Recommended for Approval)

11. Appropriate Funds and Issue Solicitations and Purchase Orders to Implement Air Quality Community Training in Eastern Coachella Valley **Higgins/3309**

U.S. EPA awarded South Coast AQMD a grant from the State Environmental Justice Cooperative Agreement Program to implement an Air Quality Academy to improve environmental literacy and air quality data in the Eastern Coachella Valley. Established in 2021, the Air Quality Academy provides training on

the application and usage of air quality sensors, interpretation of the air quality index, and preventive actions to reduce air pollution exposure. U.S. EPA approved a one year no-cost extension of this grant to continue implementation until October 2024. This action is to appropriate the remaining balance of \$41,396 to the Diversity, Equity and Inclusion with Community Air Programs Office and \$6,258 to the Monitoring and Analysis Division FY 2023-24 and/or FY 2024-25 Budgets and to issue solicitations and purchase orders. (Reviewed: Administrative Committee August 11, 2023; Recommended for Approval)

12. Appropriate Funds from the Undesignated (Unassigned) Fund Balance for Permitting Enhancement Program

Wong/3176

In order to implement the Chair's Initiative related to the Permitting Enhancement Program, assistance from retirees is temporarily needed to continue on an as needed basis for a maximum amount of \$400,000. This action is to appropriate this amount from the General Fund Undesignated (Unassigned) Fund Balance into Engineering and Permitting's FY 2023-24 Budget. (Reviewed: Administrative Committee, August 11, 2023; Recommended for approval).

13. Execute Contract(s) for Legislative Representation in Sacramento, California

Alatorre/3122

In May 2023, the Board approved release of an RFP to solicit proposals for legislative representation in Sacramento, California. Four separate proposals were received from Actum, LLC, California Advisors, LLC, Joe A. Gonsalves & Son and The Monares Group. On August 11, 2023, the Legislative Committee recommended approval of the execution of contract(s) with California Advisors, LLC for \$143,836 and Joe A. Gonsalves & Son for \$143,836 for legislative representation in Sacramento, California. (Reviewed: Legislative Committee, August 11, 2023; Recommended for Approval)

14. Approve Revisions to Class Specifications; Amend Salary Resolution to Revise Salaries as Part of Revision Process; Amend FY 2023-24 Budget By Adding and Deleting Positions to Address Operational Needs

Olvera/2309

This item is to revise the Deputy Clerk, Deputy Clerk/Transcriber, and Senior Deputy Clerk class specifications based on a classification study of Clerk of the Boards Office positions. In addition, based upon an internal review of case settlement and investigation functions in the General Counsel's Office, staff recommends revisions to the Paralegal, Senior Paralegal, Investigator, and Supervising Investigator class specifications. This item would also increase the salaries for the updated Deputy Clerk/Transcriber and Senior Deputy Clerk positions, the Paralegal

and Senior Paralegal positions, and the Supervising Air Quality Inspector position as a related matter. As part of this organizational review process, staff also recommends adding and deleting classifications in the General Counsel's Office to reflect the functions of the proposed revised class specifications. (Reviewed: Administrative Committee, August 11, 2023, Recommended for Approval)

15. Appropriate Funds and Amend Contract with Strumwasser & Woocher, LLP to Provide Representation and Advice to South Coast AQMD Hearing Board

Nakamura/3105

In December 2022, the Board authorized \$125,000 for the law firm of Strumwasser & Woocher, LLP to provide legal representation and advice to the Hearing Board on a litigation matter. A contract in an amount not to exceed \$125,000 was executed in January 2023. This action is to appropriate an additional \$300,000 for specialized legal counsel and services as requested by the South Coast AQMD Hearing Board, from the General Fund Undesignated (Unassigned) Fund Balance to the Clerk of the Boards' FY 2023-24 Budget, Services and Supplies Major Object, Professional and Special Services Account, and amend the contract with Strumwasser & Woocher, LLP to add funds in an amount not to exceed \$300,000 for specialized legal counsel and services in a litigation matter. (Reviewed: Administrative Committee, August 11, 2023; Recommended for Approval)

16. Approve Contract Awards as Approved by MSRC

McCallon

As part of their FYs 2021-24 Work Program, the MSRC approved two awards under their Request for Information for Publicly Accessible Goods Movement Zero-Emission Infrastructure. At this time, the MSRC seeks Board approval of the contract awards as part of the 2021-24 Work Program. (Reviewed: Mobile Source Air Pollution Reduction Review Committee, August 17, 2023; Recommended for Approval)

Items 17 through 25 – Information Only/Receive and File

17. Legislative, Public Affairs and Media Report

Alatorre/3122

This report highlights the July 2023 outreach activities of the Legislative, Public Affairs and Media Office, which includes: Major Events, Community Events/Public Meetings, Environmental Justice Update, Speakers Bureau/Visitor Services, Communications Center, Public Information Center, Business Assistance, Media Relations and Outreach to Business and Federal, State and Local Government. (No Committee Review)

18. Hearing Board Report **Verdugo-Peralta**
- This reports the actions taken by the Hearing Board during the period of June 1 through July 31, 2023. (No Committee Review)
19. Civil Filings and Civil Penalties Report **Gilchrist/3459**
- This report summarizes monthly penalties and legal actions filed by the General Counsel's Office from June 1, 2023 through July 31, 2023. An Index of South Coast AQMD Rules is attached with the penalty report. (Reviewed: Stationary Source Committee, August 18, 2023)
20. Intergovernmental Review of Environmental Documents and CEQA Lead Agency Projects **Krause /2706**
- This report provides a listing of CEQA documents received by South Coast AQMD between July 1, 2023 and July 31, 2023, and those projects for which South Coast AQMD is acting as lead agency pursuant to CEQA. (Reviewed: Mobile Source Committee, August 18, 2023)
21. Rule and Control Measure Forecast **Rees/2856**
- This report highlights South Coast AQMD rulemaking activities and public hearings scheduled for 2023. (No Committee Review)
22. Report of RFQs/RFPs Scheduled for Release in September **Jain/2804**
- This report summarizes the RFQs/RFPs for budgeted services over \$100,000 scheduled to be released for advertisement for the month of September. (Reviewed: Administrative Committee, August 11, 2023)
23. FY 2022-23 Contract Activity **Jain/2804**
- This report lists the number of contracts let during FY 2022-23, the respective dollar amounts, award type and the authorized contract signatory for South Coast AQMD. This report includes the data provided in the March 3, 2023 report covering contract activity for the first six months of FY 2022-23. (No Committee Review)
24. Status Report on Major Ongoing and Upcoming Projects for Information Management **Moskowitz/3329**
- Information Management is responsible for data systems management services in support of all South Coast AQMD operations. This action is to provide the monthly status report on major automation contracts and planned projects. (Reviewed: Administrative Committee, August 11, 2023)

25. Status Report on Regulation XIII – New Source Review **Aspell/2491**

This report presents the state and federal Final Determination of Equivalency for January 2021 through December 2021. The report provides information regarding the status of Regulation XIII – New Source Review (NSR) in meeting state and federal NSR requirements and shows that South Coast AQMD's NSR program is in final compliance with applicable state and federal requirements from January 2021 through December 2021. (Reviewed: Stationary Source Committee, August 18, 2023)

Items 26 through 31 -- Reports for Committees and CARB

The July and August meetings of the CARB Board were cancelled.

- | | | |
|---|-------------------|-------------------------|
| 26. Administrative Committee (Receive & File) | Chair: Delgado | Nastri/3131 |
| 27. Legislative Committee | Chair: Cacciotti | Alatorre/3122 |
| 28. Mobile Source Committee (Receive & File) | Chair: Kracov | Rees/2856 |
| 29. Stationary Source Committee (Receive & File) | Chair: McCallon | Aspell/2491 |
| 30. Technology Committee (Receive & File) | Chair: Rodriguez | Katzenstein/2219 |
| 31. Mobile Source Air Pollution Reduction Review Committee (Receive & File) | Board Rep: Hagman | Katzenstein/2219 |
| 32. <u>Items Deferred from Consent and Board Calendar</u> | | |

STAFF PRESENTATION/BOARD DISCUSSION/RECEIVE AND FILE

33. Update on Development of Rail Yard Facility Based Mobile Source Measures **MacMillan/3244**

Staff will provide an update on development of potential indirect source rules and a memorandum of understanding addressing emissions associated with new and existing rail yards. (Reviewed: Mobile Source Committee, August 18, 2023)

PUBLIC HEARINGS

34. Certify Final Environmental Assessment for Proposed Amended Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities; and Amend Rule 1178 **Krause/2706**

Proposed Amended Rule 1178 will establish enhanced leak detection and repair requirements and more stringent control requirements on tanks that store crude oil, additional seals for

internal floating roof tanks, and a higher control efficiency requirement for emission control systems. The proposed amended rule will also include provisions for true vapor pressure testing and will update reporting and recordkeeping requirements. This action is to adopt the Resolution: 1) Certifying the Final Environmental Assessment for Proposed Amended Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities, and 2) Amending Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities. (Reviewed: Stationary Source Committee, June 16, and August 18, 2023)

35. Determine That Proposed Amended Rule 1111 – Reduction of NO_x Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces, Is Exempt From CEQA; and Amend Rule 1111

Krause/2706

Rule 1111 establishes a NO_x emission limit of 14 ng/J for residential and commercial gas furnaces. Proposed Amended Rule 1111 will extend the mitigation fee alternate compliance option end date from September 30, 2023 to September 30, 2025 for mobile home furnaces. All other types of furnaces subject to Rule 1111 have fully implemented the 14 ng/J NO_x limit; mobile home furnaces are the last type with the mitigation fee alternate option. This action is to adopt the Resolution: 1) Determining that Proposed Amended Rule 1111 – Reduction of NO_x Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces, is exempt from the requirements of the California Environmental Quality Act; and 2) Amending Rule 1111 – Reduction of NO_x Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces. (Reviewed: Stationary Source Committee, August 18, 2023)

OTHER BUSINESS

36. Execute Contract for Independent Audit Services for FYs Ending June 30, 2023, 2024, and 2025

Jain/2804

On November 4, 2022, the Board approved release of an RFP for independent financial audit services. Four qualified proposals were submitted and reviewed by the Administrative Committee at its March 10, 2023 meeting. Although the Board initially selected The Pun Group, LLP it is now necessary to select another firm due to their resignation and to complete the audit ahead of the fast-approaching deadlines. This action is to execute a contract with the second ranked firm Lance, Soll & Lunghard, LLP. (No Committee Review)

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)

Gilchrist/3459

CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION

It is necessary for the Board to recess to closed session 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 South Coast AQMD is a party. The actions are:

- In the Matter of South Coast Air Quality Management District v. Southern California Gas Company, Aliso Canyon Storage Facility, South Coast AQMD Hearing Board Case No. 137-76 (Order for Abatement); People of the State of California, ex rel South Coast Air Quality Management District v. Southern California Gas Company, Los Angeles Superior Court Case No. BC608322; Judicial Council Coordinated Proceeding No.4861;
- South Coast Air Quality Management District, et al. v. EPA, United States Court of Appeals, D.C. Circuit, Case No. 19-1241 (consolidated with Union of Concerned Scientists v. NHTSA, No. 19-1230);
- South Coast Air Quality Management District, et al. v. NHTSA, EPA, et al., United States Court of Appeals, D.C. Circuit, Filed May 28, 2020;
- Natural Resources Defense Council, et al. v. City of Los Angeles, et al., San Diego Superior Court, Case No. 37-2021-00023385-CU-TT-CTL (China Shipping Case) (transferred from Los Angeles Superior Court, Case No. 20STCP02985); Fourth District Court of Appeal, Division One, No. D080902;
- California Trucking Association v. South Coast Air Quality Management District; the Governing Board of the South Coast Air Quality Management District; and Does 1 through 25, inclusive, U.S. District Court for the Central District of California, Case No. 2:21-cv-06341;
- In the Matter of South Coast Air Quality Management District v. Baker Commodities, South Coast AQMD Hearing Board Case No. 6223-1 (Order for Abatement); Baker Commodities, Inc. v. South Coast Air Quality Management District Hearing Board; South Coast Air Quality Management District; South Coast Air Quality Management District Hearing Board Members: Cynthia Verdugo-Peralta, Robert Pearman, Micah Ali, and Allan Bernstein, DPM MBA, in their official capacities only; and 100 Does and Roes, Los Angeles County Superior Court, Case No. 22STCP03597;
- South Coast Air Quality Management District v. EPA, U.S. District Court for the Central District of California, Case No. 2:23-cv-02646; and
- East Yard Communities for Environmental Justice, et al. v. South Coast Air Quality Management District, the Governing Board of the South Coast Air Quality Management District, the California Air Resources Board, and Does 1 through 25, Inclusive, U.S. District Court for the Central District of California, Case No. 2:23-cv-06682.

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).

- Center for Biological Diversity and Center for Environmental Health v. Michael S. Regan, in his official capacity as Administrator, United States Environmental Protection Agency, U.S. District Court for the Northern District of California, Case No. 4:23-cv-00148 (PM 2.5); and
- Western States Trucking Association, Inc. v. EPA, et al., United States Court of Appeals, D.C. Circuit, Case No. 23-1143.

CONFERENCE WITH LEGAL COUNSEL – ANTICIPATED LITIGATION

Also, it is necessary for the Board to recess to closed session pursuant to Government Code section 54956.9(d)(2) to confer with its counsel because there is a significant exposure to litigation against the South Coast AQMD (two cases).

CONFERENCE WITH LABOR NEGOTIATORS

It is also necessary to recess to closed session pursuant to Government Code section 54957.6 to confer with labor negotiators:

Agency Designated Representative: A. John Olvera, Deputy Executive Officer – Administrative & Human Resources;

- Employee Organization(s): Teamsters Local 911, and South Coast AQMD Professional Employees Association; and
- Unrepresented Employees: Designated Deputies and Management and Confidential employees.

ADJOURNMENT

*****PUBLIC COMMENTS*****

Members of the public are afforded an opportunity to speak on any agenda item before consideration of that item. Persons wishing to speak may do so in person or remotely via Zoom or telephone. To provide public comments via a Desktop/Laptop or Smartphone, click on the “Raise Hand” at the bottom of the screen, or if participating via Dial-in/Telephone Press *9. This will signal to the host that you would like to provide a public comment and you will be added to the list.

All agendas are posted at South Coast AQMD Headquarters, 21865 Copley Drive, Diamond Bar, California, and website, <http://www.aqmd.gov/home/news-events/meeting-agendas-minutes>, at least 72 hours in advance of the meeting. At the beginning of the agenda, an opportunity is also provided for the public to speak on any subject within the South Coast AQMD's authority. Speakers may be limited to a total of three (3) minutes for the entirety of the Consent Calendar plus Board Calendar, and three (3) minutes or less for each of the other agenda items.

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 the Public Comment Period 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. Individuals who wish to submit written or electronic comments must submit such comments to the Clerk of the Board, South Coast AQMD, 21865 Copley Drive, Diamond Bar, CA 91765-4178, (909) 396-2500, or to cob@aqmd.gov, on or before 5:00 p.m. on the Tuesday prior to the Board meeting.

ACRONYMS

AQ-SPEC = Air Quality Sensor Performance Evaluation Center	NATTS =National Air Toxics Trends Station
AQIP = Air Quality Investment Program	NESHAPS = National Emission Standards for Hazardous Air Pollutants
AQMP = Air Quality Management Plan	NGV = Natural Gas Vehicle
AVR = Average Vehicle Ridership	NOx = Oxides of Nitrogen
BACT = Best Available Control Technology	NSPS = New Source Performance Standards
BARCT = Best Available Retrofit 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	PEV = Plug-In Electric Vehicle
CEC = California Energy Commission	PHEV = Plug-In Hybrid Electric Vehicle
CEQA = California Environmental Quality Act	PM10 = Particulate Matter ≤ 10 microns
CE-CERT =College of Engineering-Center for Environmental Research and Technology	PM2.5 = Particulate Matter ≤ 2.5 microns
CNG = Compressed Natural Gas	RECLAIM=Regional Clean Air Incentives Market
CO = Carbon Monoxide	RFP = Request for Proposals
DOE = Department of Energy	RFQ = Request for Quotations
EV = Electric Vehicle	RFQQ=Request for Qualifications and Quotations
EV/BEV = Electric Vehicle/Battery 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	VOC = Volatile Organic Compound
MSRC = Mobile Source (Air Pollution Reduction) Review Committee	ZEV = Zero Emission Vehicle

INSTRUCTIONS FOR ELECTRONIC PARTICIPATION

Instructions for Participating in a Virtual Meeting as an Attendee

As an attendee, you will have the opportunity to virtually raise your hand and provide public comment.

Before joining the call, please silence your other communication devices such as your cell or desk phone. This will prevent any feedback or interruptions during the meeting.

For language interpretation:

Click the interpretation Globe icon at the bottom of the screen

Select the language you want to hear (either English or Spanish)

Click "Mute Original Audio" if you hear both languages at the same time.

Para interpretación de idiomas:

Haga clic en el icono de interpretación el globo terráqueo en la parte inferior de la pantalla

Seleccione el idioma que desea escuchar (inglés o español)

Haga clic en "Silenciar audio original" si escucha ambos idiomas al mismo tiempo.

Please note: During the meeting, all participants will be placed on Mute by the host. You will not be able to mute or unmute your lines manually.

After each agenda item, the Chair will announce public comment.

Speakers may be limited to a total of 3 minutes for the entirety of the consent calendar plus board calendar, and three minutes or less for each of the other agenda items.

A countdown timer will be displayed on the screen for each public comment.

If interpretation is needed, more time will be allotted.

Directions to provide public comment on ZOOM from a DESKTOP/LAPTOP or SMARTPHONE:

Click on the "Raise Hand" feature at the bottom of the screen.

This will signal to the host that you would like to provide a public comment and you will be added to the list.

Directions to provide public comment via TELEPHONE:

Dial *9 on your keypad to signal that you would like to comment.

Directions for Spanish Language TELEPHONE line only:

- The call in number is the same (+1 669 900 6833)
- The meeting ID number is 932-0955-9643
- If you would like to make public comment, please dial *9 on your keypad to signal that you would like to comment.

Instrucciones para la línea de TELÉFONO en español únicamente:

- El número de llamada es el mismo (+1 669900 6833 o +1 93209559643)
- El número de identificación de la reunión es 932-0955-9643
- Si desea hacer un comentario público, marque *9 en su teclado para indicar que desea comentar.

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BOARD MEETING DATE: September 1, 2023

AGENDA NO. 1

MINUTES: Governing Board Monthly Meeting

SYNOPSIS: Attached are the Minutes of the August 4, 2023
Board Meeting.

RECOMMENDED ACTION:

Approve the August 4, 2023 Board Meeting Minutes.

Faye Thomas
Clerk of the Boards

FT

FRIDAY, AUGUST 4, 2023

Notice having been duly given, the regular meeting of the South Coast Air Quality Management District Board was conducted in a hybrid format (in person and remotely via videoconferencing and telephone). Members present:

Senator Vanessa Delgado (Ret.), Chair
Senate Rules Committee Appointee

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

Mayor Lock Dawson
Cities of Riverside County

Supervisor Curt Hagman
County of San Bernardino

Gideon Kracov
Governor's Appointee

Mayor Larry McCallon
Cities of San Bernardino County

Veronica Padilla-Campos
Speaker of the Assembly Appointee

Supervisor V. Manuel Perez
County of Riverside

Councilmember Carlos Rodriguez
Cities of Orange County

Absent: Supervisor Andrew Do
County of Orange

Supervisor Holly J. Mitchell
County of Los Angeles

Councilmember Nithya Raman
City of Los Angeles

Councilmember José Luis Solache
Cities of Los Angeles County – Western Region

For additional details of the Governing Board Meeting, please refer to the recording of the [Webcast](#) at: Live Webcast (aqmd.gov)

CALL TO ORDER: Chair Delgado called the meeting to order at 9:08 a.m.

- Pledge of Allegiance: Led by Mayor Patricia Lock Dawson
- Roll Call
Councilmember Solache was not present for the meeting but was listening in remotely.
- Opening Comments
Chair Delgado acknowledged that she left the breakfast with the interns this morning feeling assured that the future is in capable hands.

Vice Chair Cacciotti shared photos of city council meetings and events he attended in the cities of Sierra Madre, La Puente, Monrovia, and South Pasadena to discuss air quality and demonstrate an electric leaf blower; as well as photos of a Metrolink train powered by renewable fuel and a FedEx electric delivery truck. For additional details, please refer to the [Webcast](#) beginning at 13:30.

Vice Chair Cacciotti commented on SB 329 (Dodd), which Governor Newsom recently signed into law, that will increase compensation for city councilmembers in general law cities for the first time in nearly four decades. He requested that staff explore possible legislation to modify the compensation for Board members, and for Board Members Kracov and Perez to receive compensation for work they perform as CARB Board Members.

Mayor McCallon thanked everyone for their prayers and support during his recent health issue.

Supervisor Perez suggested that staff follow the interns as they progress through their educational endeavors to establish a pipeline of prospective employees for recruitment once they graduate.

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

The Public Comment Period on Non-Agenda Items was opened. The following individuals addressed the Board.

Jeff Weaver, San Juan Capistrano resident, inquired about the permitting process for waste-to-energy projects. Jason Aspell, Deputy Executive Officer/Engineering and Permitting, offered to meet with Mr. Weaver to discuss landfills and waste-to-energy projects. For additional details, please refer to the [Webcast](#) beginning at 24:40.

Mandeera Wijetunga, Climate Campaigner, Pacific Environment, commented on elevated air pollution emissions and associated health effects on frontline communities due to the continued increase in cargo ship traffic. He emphasized the need for a regulatory approach to address pollution from the ports and urged that Proposed Rule 2304 be adopted this year to set mandatory emission caps with a faster deadline to transition from fossil fuels. For additional details, please refer to the [Webcast](#) beginning at 26:06.

There being no further requests to speak, the Public Comment Period was closed.

Written Comment Letter Submitted Regarding Shipping Pollution

One letter signed by the following organizations: Earthjustice, East Yard Communities for Environmental Justice, Long Beach Alliance for Children with Asthma, Natural Resources Defense Council, Pacific Environment, People's Collective for Environmental Justice, Sierra Club, and West Long Beach Association.



CONSENT AND BOARD CALENDAR

Items 1 through 4 – Action Items/No Fiscal Impact

1. Approve Minutes of June 2, 2023 Board Meeting
2. Set Public Hearing September 1, 2023 to Consider Adoption of and/or Amendments to South Coast AQMD Rules and Regulations:
 - A. Certify Final Environmental Assessment for Proposed Amended Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities; and Amend Rule 1178
 - B. Determine That Proposed Amended Rule 1111 – Reduction of NOx Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces, Is Exempt From CEQA; and Amend Rule 1111
3. Approve Appointment by South Coast Air Quality Management District Building Corporation of Jill Whynot to Building Corporation's Board of Directors
4. Special Meeting of Health Effects of Air Pollution Foundation

Items 5 and 6 – Budget/Fiscal Impact

5. Issue Program Announcement, and Execute Contracts for Paving Project Plan Within Assembly Bill 617 Community of Eastern Coachella Valley
6. Approve Fund Transfer for Miscellaneous and Direct Expenditures Costs in FY 2023-24 as Approved by MSRC

Items 7 through 12 – Information Only/Receive and File

7. Legislative, Public Affairs and Media Report
8. Hearing Board Report
9. Civil Filings and Civil Penalties Report
10. Lead Agency Projects and Environmental Documents Received
11. Rule and Control Measure Forecast
12. Status Report on Major Ongoing and Upcoming Projects for Information Management

Items 13 through 19 – Reports for Committees and CARB

13. Administrative Committee
14. Investment Oversight Committee
15. Legislative Committee
16. Mobile Source Committee
17. Stationary Source Committee
18. Mobile Source Air Pollution Reduction Review Committee
19. California Air Resources Board Monthly Report
20. Items Deferred from Consent and Board Calendar
Agenda Item No. 5 was pulled for comment or discussion.



The public comment period was opened for Agenda Item Nos. 1 through 19.

Agenda Item No. 2A – Proposed Amended Rule 1178

Bridgett McCann, Chevron, spoke in support of PAR 1178 and expressed appreciation to staff for the transparency and collaboration they have shown to all stakeholders during this rulemaking process. For additional details, please refer to the [Webcast](#) beginning at 30:40.

Agenda Item No. 2B – Proposed Amended Rule 1111

Fernando Gaytan, Earthjustice, expressed concern that the proposed amendments to Rule 1111 extend the mitigation fee for gas-fired residential furnaces and that little progress has been made implementing control measures identified in the 2202 AQMP that address emissions standards for combustion-based appliances used in buildings. He urged staff to prioritize rulemaking aimed at reducing NOx emissions standards for appliances. For additional details, please refer to the [Webcast](#) beginning at 31:57.

Agenda Item No. 11 – Rule Forecast Report

Yasmine Angelidis, Earthjustice

Alison Hahm, Natural Resources Defense Council

Chris Chavez, Coalition for Clean Air and Wilmington, Carson, and West Long Beach

AB 617 Community Steering Committee member

Mandeera Wijetunga, Climate Campaigner/Pacific Environment

Taylor Thomas, East Yard Communities for Environmental Justice

These speakers commented on the following issues. For additional details, please refer to the [Webcast](#) beginning at 35:15.:

- Expressed disappointment at staff's proposed intent to pursue a voluntary MOU agreement instead of the Railyard ISR.
- Urged staff to continue to pursue a regulatory approach for railyards

- Emphasized the need to conduct discussions regarding railyards through an open and public process.
- Commented that AB 617 CERPs identified railyards and railroad activities as a major concern for their communities.

Jed Holtzman, RMI, urged staff to schedule zero-emission appliance rules identified in the 2202 AQMP for adoption in 2024 and that staff develop work plans to meet the deadline with no delays. For additional details, please refer to the [Webcast](#) beginning at 40:05.

Agenda Item No. 5 – Issue Program Announcement, and Execute Contracts for Paving Project Plan Within Assembly Bill 617 Community of Eastern Coachella Valley

Krystal Otworth, Leadership Counsel for Justice and Accountability, expressed support for the Eastern Coachella Valley Paving Project Plan, noting that the plan reflects the collective priorities of Eastern Coachella Valley residents from the unincorporated communities of Mecca, Thermal, Oasis and North Shore and is a byproduct of four years of community collaboration in which unpaved roadways were identified as a major source of dust and particulate matter emissions. The proposed plan focuses on improving community infrastructure that will enhance mobility and mitigate the harmful effects of airborne dust and particulate matter. For additional details, please refer to the [Webcast](#) beginning at 42:35.

There being no further requests to speak, the public comment period was closed for Agenda Item Nos. 1 through 19.



Mr. Nastri thanked the speakers for sharing their thoughts about a potential railyard MOU. He explained the key considerations and recent developments that have prompted staff to consider an MOU agreement that would deliver better results than a regulatory approach and as quickly as possible. As part of the public process, staff will be meeting with the railroads and affected stakeholders to receive input about all options aimed at reducing emissions from railyards. The first working group meeting has been scheduled for August 17, 2023. Staff intends to report back to the Mobile Source Committee on what develops from these public meetings. For additional details, please refer to the [Webcast](#) beginning at 51:34.

Board Action (Item Nos. 1-4 and 6-19)

MOVED BY CACCIOTTI, SECONDED BY KRACOV TO APPROVE AGENDA ITEMS 1 THROUGH 4 and 6 THROUGH 19 AS RECOMMENDED, RECEIVE AND FILE THE COMMITTEE, MSRC, AND CARB REPORTS, AND APPROVE THE RECOMMENDATIONS ON LEGISLATION AS SET FORTH BELOW.

THE MOTION PASSED BY THE FOLLOWING VOTE:

AYES: Cacciotti, Lock Dawson, Delgado, Hagman, Kracov, McCallon, Padilla-Campos, Perez, and Rodriguez

NOES: None

ABSTAIN: None

ABSENT: Do, Mitchell, Raman, and Solache

Legislation/Agenda Item	Recommendation
AB 985 (Arambula) San Joaquin Valley Unified Air Pollution Control District: emission reduction credit system	Oppose
SB 310 (Dodd) Prescribed fire: civil liability: cultural burns	Oppose unless Amended
SB 410 (Becker) Powering Up Californians Act	Support
SB 537 (Becker) Open meetings: multijurisdictional cross-county Agencies: teleconferences	Support



Item Pulled for Comments or Discussion

Agenda Item No. 5 – Issue Program Announcement, and Execute Contracts for Paving Project Plan Within Assembly Bill 617 Community of Eastern Coachella Valley

Supervisor Perez requested that staff highlight the Eastern Coachella Valley Paving Project Plan. Kathryn Higgins, Assistant Deputy Executive officer/Diversity, Equity, and Inclusion with Community Air Program, provided a brief overview of how the community-led process was developed and explained the purpose and timeline for release of the Program Announcement. For additional details, please refer to the [Webcast](#) beginning at 56:03.

Supervisor Perez asked whether the properties selected for paving are privately or publicly owned and if the list of properties has been finalized. Ms. Higgins responded that the list includes a combination of public access roadways, parking lots, and privately owned properties, including mobile home parks. Supervisor Perez recommended that staff coordinate the implementation of the paving project with the County of Riverside's Planning Department as well as his office. He acknowledged the efforts of Assemblymember Eduardo Garcia in securing funding for AB 617. For additional details, please refer to the [Webcast](#) beginning at 1:00:41.

Board Action (Item 5)

MOVED BY PEREZ, SECONDED BY CACCIOTTI TO APPROVE AGENDA ITEM 5 AS RECOMMENDED.

THE MOTION PASSED BY THE FOLLOWING VOTE:

AYES: Cacciotti, Lock Dawson, Delgado, Hagman, Kracov, McCallon, Padilla-Campos, Perez, and Rodriguez

NOES: None

ABSTAIN: None

ABSENT: Do, Mitchell, Raman, and Solache



STAFF PRESENTATION/BOARD DISCUSSION/RECEIVE AND FILE

- 21. Workplan for Permitting Enhancement Program (Presentation in Lieu of Board Letter)

Jason Aspell, Deputy Executive Officer, Engineering and Permitting, gave the staff presentation.

Chair Delgado noted that getting an understanding of how the permitting workflow operates reinforces that this issue should be a priority for the Board. For additional details, please refer to the [Webcast](#) beginning at 1:31:05.

Supervisor Hagman emphasized the importance for staff to get input from stakeholders on how to increase the efficiency of the permitting process. He suggested that staff look at moving to digital platforms to reduce paper. For additional details, please refer to the [Webcast](#) beginning at 1:31:27.

Board Member Padilla-Campos commented on the need to ensure that there be continued human interaction with facilities. For additional details, please refer to the [Webcast](#) beginning at 1:33:43.

Councilmember Rodriguez asked whether staff has reviewed the permitting process used at other agencies to learn about their experiences and best practices learned. He inquired about the historical context of the 18-month target and its appropriateness and recommended that staff provide a status update in six months instead of one year. For additional details, please refer to the [Webcast](#) beginning at 1:34:53.

Mr. Aspell stated that staff has been in contact with U.S. EPA and other air districts who have noted experiencing similar staffing and backlog challenges with their permit processing. One air district has an electronic system for smaller and less complex permits. Mr. Aspell explained that most of the permits are acted on in less than six months. The greatest challenge is with the Title V permits as those are generally more complex and have additional criteria. Mr. Aspell recognized that staff will need to continually manage these more complex permits and implement the workplan. Providing an update in a year, allows time to hire and train more engineers and implement the workplan. For additional details, please refer to the [Webcast](#) beginning at 1:38:18.

Mr. Nastri commented on the aggressive efforts that were taken in the past to address the backlog and he identified that the historical backlog had been much larger than it is currently. The workplan represents the investment in an infrastructure that will hopefully minimize the cyclical occurrence of a buildup of permits. For additional details, please refer to the [Webcast](#) beginning at 1:38:20.

Vice Chair Cacciotti emphasized the importance of balancing public safety against the need to expeditiously process permits and thanked staff for this effort. For additional details, please refer to the [Webcast](#) beginning at 1:19:49.

Mayor Lock Dawson asked whether other staff could perform aspects of the permitting process that do not require the technical expertise of an engineer. Mr. Aspell noted that staff has proposed assigning administrative tasks to non-engineers while the engineers focus on processes that require their expertise. For additional details, please refer to the [Webcast](#) beginning at 1:45:05

Board Member Kracov expressed support for this effort and echoed the request of Councilmember Rodriguez for a progress report in six months. For additional details, please refer to the [Webcast](#) beginning 1:47:40 .

Chair Delgado liked the concept of outside training as it will facilitate additional feedback. She recommended including pending responses from the permit applicant as an application status indicator, to account for the time spent waiting to receive additional information from the applicant. For additional details, please refer to the [Webcast](#) beginning 1:48:18.

The public comment period was opened for Agenda Item No. 21. The following individual addressed the Board.

Curt Coleman, Southern California Air Quality Alliance, thanked Chair Delgado for making this a top priority. He commented on the Permit Streamlining Task Force and its importance in providing feedback regarding permit applicant priorities and effectiveness of staff actions. He was pleased to learn that the Task Force will continue to meet, monitor progress, and provide feedback. For additional details, please refer to the [Webcast](#) beginning 1:50:16 .

Bill Quinn, California Council for Environmental and Economic Balance (CCEEB), thanked Chair Delgado for making permit processing a priority. He noted that some CCEEB members have been testing some of the new programs in real time and offered to expand those efforts, as well as help in other ways to make sure that these new processes are successful and tested accurately. For additional details, please refer to the [Webcast](#) beginning 1:51:27.

There being no further requests to speak, the public comment period was closed for Agenda Item No. 21.



22. Determine That Proposed Amended Rule 1153.1 – Emissions of Oxides of Nitrogen from Commercial Food Ovens, Is Exempt from CEQA; and Amend Rule 1153.1

Heather Farr, Planning and Rules Manager, gave the staff presentation.

Vice Chair Cacciotti asked why commercially available technologies for smaller oven categories are not widely used and whether an incentive program is needed to increase awareness and encourage conversion to zero emissions. Ms. Farr commented that it is not widely used because the technology is just starting to emerge. For additional details, please refer to the [Webcast](#) beginning at 2:00:45.

The public comment period was opened for Agenda Item No. 22. The following individuals addressed the Board.

Jeremy Gartland, Earthjustice

*Ayn Craciun, Climate Action Campaign

Annie Wang, Earthjustice

Lexi Hernandez, Climate Action Campaign

Leeza Bondarchuk, Sunrise Movement of Orange County

Kyler Chin, University of California, Irvine student and Sunrise Movement Orange County

*Alejandro Sobrera Barboza, John Hopkins School of Advanced International Studies student and Anaheim resident

Topher Mathers, Active San Gabriel Valley

*Jed Holtzman, RMI

*Evan Gillespie, Industrious Labs

*Chris Chavez, Coalition for Clean Air

Kimberly Orbe, Sierra Club

(*Submitted Written Comments)

These speakers expressed support for the staff proposal and urged its adoption. Some of their comments are as follows:

- Commented on harmful health impacts from gas appliances and the need to push for electrification
- Concerned with the compliance schedule and burner useful life and replacement in large ovens
- Emphasized pursuing federal and/or state funds to encourage the development of zero-emission commercial ovens.
- Noted that the proposal could have been stronger
- Remarked on the need to continue to push for the conversion of this equipment to zero emissions
- Urged to move forward on other control measures in the AQMP that advances zero emissions further in residential and commercial buildings
- Expressed concern that facilities may install as little as one replacement burner in a large oven

There being no further requests to speak, the public comment period was closed for Agenda Item No. 22.



Supervisor Hagman commented on the need to consider the potential consequences of regulations. He cautioned that food manufacturers may be forced to relocate out of California due to regulations that make them less competitive. For additional details, please refer to the [Webcast](#) beginning at 2:27:09.

Vice Chair Cacciotti expressed support for the staff proposal and suggested that staff consider looking at different incentive programs and releasing program announcements early 2024 for residential and commercial appliances. For additional details, please refer to the [Webcast](#) beginning at 2:30:51.

Board Member Padilla-Campos expressed support for the staff recommendation, noting that it will protect the health of her brother who is a chef. For additional details, please refer to the [Webcast](#) beginning at 2:31:55.

Supervisor Perez acknowledged the need to ensure a balanced approach to the regulatory process. He expressed support for the staff proposal that reflects a compromise for the various stakeholders involved. For additional details, please refer to the [Webcast](#) beginning at 2:32:23.

Written Comment Letters Submitted:

Dennis Arp
Amir Baum
Greg Camphire
Jake Comer
Ayn Craciun, Climate Action Campaign
Maurie Edelman, Ph.D.
Leonel Flores
Lida Jenney
Keith Linker
Susan Mattisinko, Irvine resident

H. Meyers, Huntington Beach resident
Kent Morris
Kathy Orlinsky
Craig Preston, Orange County resident
Tanvi Shah
Alejandro Sobrera Barboza
Gary Stewart, Laguna Beach resident and Citizens Climate Lobby
Gregory Tabat, Santa Ana resident
Max Wang, Irvine resident

Written Comment Letter Submitted:

One letter signed by the following organizations: Earthjustice, Active San Gabriel Valley, California Safe Schools, Coalition for Clean Air, East Yard Communities for Environmental Justice, Industrious Labs, RMI, San Pedro & Peninsula Homeowners Coalition, Sierra Club, and West Long Beach Association

Board Action (Item 22)

MOVED BY CACCIOTTI, SECONDED BY PEREZ TO APPROVE AGENDA ITEM 22 AS RECOMMENDED TO ADOPT RESOLUTION NO. 23-16:

DETERMINING THAT PROPOSED AMENDED RULE 1153.1 – EMISSIONS OF OXIDES OF NITROGEN FROM COMMERCIAL FOOD OVENS, IS EXEMPT FROM THE REQUIREMENTS OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT; AND

AMENDING RULE 1153.1 – EMISSIONS OF OXIDES OF NITROGEN FROM COMMERCIAL FOOD OVENS.

THE MOTION PASSED BY THE FOLLOWING VOTE:

AYES: Cacciotti, Lock Dawson, Delgado, Hagman, Kracov, McCallon, Padilla-Campos, and Perez

NOES: Rodriguez

ABSTAIN: None

ABSENT: Do, Mitchell, Raman, and Solache



23. Determine That Proposed Amended Rule 2202 – On-Road Motor Vehicle Options, Is Exempt from CEQA; and Amend Rule 2202

Ian MacMillan, Assistant Deputy Executive Officer/Planning, Rule Development, and Implementation gave the staff presentation.

Mayor McCallon inquired about the purpose and use of the VMT data collection/reporting, especially if all vehicles are zero emissions. He further inquired why collecting data to identify zero-emission vehicles is not required of all worksites. For additional details, please refer to the [Webcast](#) beginning at 2:42:10.

Mr. MacMillan clarified that collecting additional data would help identify potential options to increase the use of zero-emissions vehicles in a future rule amendment. In addition, while some worksites collect data on zero-emissions vehicle use, requiring all sites to conduct these surveys would be a more fundamental change to the rule that is not proposed in the current amendment, yet potentially could be included in a future amendment.

The public comment period was opened for Agenda Item No. 23. The following individual addressed the Board.

Harvey Eder, Public Solar Power Coalition, provided comments that were not related to this item.

There being no further requests to speak, the public comment period was closed for Agenda Item No. 23.

Supervisor Hagman commented about the unintended consequences of regulations. He expressed concerns on how the data being requested will be used in future rule amendments that may have implications on employers' hiring practices and people's work patterns. For additional details, please refer to the [Webcast](#) beginning at 2:46:33.

Board Member Kracov commented that it will take decades to achieve a zero-emission light duty fleet. He added that this agency is based on science and data, so it makes sense to gather this data. He acknowledged the need to address Supervisor Hagman's concerns. For additional details, please refer to the [Webcast](#) beginning at 2:48:57.

Mr. Nastri explained that the purpose of this proposal is to collect data, and staff will make recommendations on how to proceed based on the data collected. He urged the Board to adopt the data collection provisions of PAR 2202 and noted that the Board can exercise its authority to weigh in on how staff moves forward once the data is collected. Chair Delgado expressed appreciation for Mr. Nastri's comment. For additional details, please refer to the [Webcast](#) beginning at 2:48:58.

Supervisor Hagman commented about his experience with data collection and expressed concerns that VMT data may be used to regulate people's driving habits. He questioned the need to collect the data given ongoing efforts that have been moving us toward electric vehicles. For additional details, please refer to the [Webcast](#) beginning at 2:50:45.

Board Action (Item 23)

MOVED BY PEREZ, SECONDED BY CACCIOTTI TO APPROVE AGENDA ITEM 23 AS RECOMMENDED TO ADOPT RESOLUTION NO. 23-17:

DETERMINING THAT PROPOSED AMENDED RULE 2202 – ON-ROAD MOTOR VEHICLE MITIGATION OPTIONS IS EXEMPT FROM THE REQUIREMENTS OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT; AND

AMENDING RULE 2202 – ON-ROAD MOTOR VEHICLE MITIGATION OPTIONS

THE MOTION PASSED BY THE FOLLOWING VOTE:

AYES: Cacciotti, Lock Dawson, Delgado, Kracov, McCallon, Padilla-Campos, and Perez

NOES: Hagman and Rodriguez

ABSTAIN: None

ABSENT: Do, Mitchell, Raman, and Solache



CLOSED SESSION

There was no closed session.

ADJOURNMENT

There being no further business, the meeting was adjourned at 11:53 a.m.

The foregoing is a true statement of the proceedings held by the South Coast Air Quality Management District Board on August 4, 2023.

Respectfully Submitted,

Faye Thomas
Clerk of the Boards

Date Minutes Approved: _____

Vanessa Delgado, Chair

ACRONYMS

AQMP = Air Quality Management Plan
CARB = California Air Resources Board
CEQA = California Environmental Quality Act
FY = Fiscal Year
ISR = Indirect Source Rule
PAR = Proposed Amended Rule
VMT = Vehicle Miles Traveled

BOARD MEETING DATE: September 1, 2023

AGENDA NO. 2

PROPOSAL: Set Public Hearing October 6, 2023 to Consider Adoption of and/or Amendments to South Coast AQMD Rules and Regulations:

Determine That Proposed Amended Rule 1405 – Control of Ethylene Oxide Emissions from Sterilization and Related Operations, Is Exempt from CEQA; and Amend Rule 1405

Proposed Amended Rule 1405 establishes new and enhanced control and monitoring requirements to further reduce stack and fugitive ethylene oxide emissions from sterilization operations. Proposed Amended Rule 1405 includes reporting, recordkeeping, and curtailment provisions. Proposed Amended Rule 1405 also includes inventory tracking, monitoring and reporting provisions for certain large warehouses receiving materials sterilized by ethylene oxide. This action is to adopt the Resolution: 1) Determining that Proposed Amended Rule 1405 – Control of Ethylene Oxide Emissions from Sterilization and Related Operations is exempt from the requirements of the California Environmental Quality Act; and 2) Amending Rule 1405 – Control of Ethylene Oxide Emissions from Sterilization and Related Operations. (Reviewed: Stationary Source Committee, April 21, June 16, and August 18, 2023)

The complete text of the proposed amended rules, staff report and other supporting documents will be available from the South Coast AQMD's Public Information Center at (909) 396-2001, or Mr. Derrick Alatorre – Deputy Executive Officer/Public Advisor, South Coast AQMD, 21865 Copley Drive, Diamond Bar, CA 91765, (909) 396-2432, dalatorre@aqmd.gov and on the Internet (www.aqmd.gov) as of September 6, 2023.

RECOMMENDED ACTIONS:

Set public hearing October 6, 2023 to determine that Proposed Amended Rule 1405 is exempt from CEQA and Amend Rule 1405.

Wayne Nastri
Executive Officer

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BOARD MEETING DATE: September 1, 2023

AGENDA NO. 3

PROPOSAL: Request Approval of Proposed Membership Roster for the AQMP Advisory Group

SYNOPSIS: Staff is recommending that membership be granted for the AQMP Advisory Group for a new four-year term. The current term for the AQMP Advisory Group is set to expire on September 5, 2023. The AQMP Advisory Group consists of representatives from environmental/community groups, government agencies, academia, and businesses. The primary role of the AQMP Advisory Group is to review and provide recommendations to staff regarding the implementation of the 2022 AQMP and the development of SIPs aimed at demonstrating attainment of NAAQS. In December 2002, the Blue Ribbon Panel developed recommendations for the AQMP Advisory Group, including the applicable Board Committee. The proposed action seeks to have revisions to the AQMP Advisory Group membership reviewed by the Mobile Source Committee instead of the Stationary Source Committee and to approve the suggested membership roster for the AQMP Advisory Group.

COMMITTEE: Mobile Source, August 18, 2023; Recommended for Approval

RECOMMENDED ACTIONS:

1. Revise the Blue Ribbon Panel recommendations to review changes to the membership of the AQMP Advisory Group with the Mobile Source Committee instead of the Stationary Source Committee; and
2. Approve proposed membership roster for the AQMP Advisory Group (Attachment A) for a new four-year term.

Wayne Natri
Executive Officer

Background

In January 1997, the Board formed six Advisory Groups to provide advice and recommendations to Board Committees and the Board on specific areas of expertise. In December 2002, the Board adopted the Blue Ribbon Panel recommendations regarding the duties and activities of the Advisory Groups. Since then, the AQMP Advisory Group has contributed to the development of the overall aspects of the region's AQMPs and has made recommendations concerning policy, control measures, and attainment strategies. Specifically, the AQMP Advisory Group charter states that its mission is to: 1) review and provide comments on: (a) studies relevant to advancing scientific and technical knowledge in support of AQMP and SIP preparation, (b) emissions inventory development and modeling approaches, (c) the development of new and revised control strategies, including on- and off-road mobile sources, and (d) socioeconomic data and evaluations; 2) foster coordinated approaches toward overall attainment strategies and implementation of AQMPs; and 3) assist in resolving key technical issues. Currently, the Blue Ribbon Panel states that changes to the membership of the AQMP Advisory Group should be reviewed by the Stationary Source Committee. However, since all matters related to AQMPs are presented to the Mobile Source Committee, staff is recommending that changes to the membership of the AQMP Advisory Group be reviewed by the Mobile Source Committee.

The AQMP Advisory Group members are appointed by the Board. The AQMP Advisory Group charter calls for approximately 40 members comprised of representatives from environmental/community groups, government agencies, academia, and businesses. The previous membership roster for the AQMP Advisory Group was approved in September 2019 for a four-year term, expiring in September 2023.

Proposal

Staff is proposing a new membership roster for the AQMP Advisory Group to assist staff with various AQMP/SIP related projects for the new four-year term commencing upon the Board's approval and expiring in September 2027. The proposed membership roster for the AQMP Advisory Group is provided in Attachment A. The roster consists of 32 members representing partner agencies, government agencies, businesses, environmental/community groups, academic/research and labor. Business interests and environmental/community groups comprise the majority of the Advisory Group at approximately 47 percent and 22 percent of the proposed membership, respectively. The proposed membership roster was developed by soliciting nominations from existing Advisory Group members and public members. After the nomination process concluded, staff contacted representatives from under-represented group types to ensure the AQMP Advisory Group include a diverse stakeholder membership.

The duties of this Advisory Group includes reviewing and providing feedback on a SIP revision to demonstrate attainment of the 2012 annual PM2.5 National Ambient Air Quality Standard (NAAQS), implementation of the 2022 AQMP, as needed, and future AQMP/SIP revisions. The AQMP Advisory Group will meet throughout the year at various frequencies (e.g., monthly, quarterly) depending on the plan development schedule.

Resource Impacts

Existing South Coast AQMD resources are adequate to host the AQMP Advisory Group meetings.

Attachment

Proposed AQMP Advisory Group Roster

ATTACHMENT A

**Proposed Air Quality Management Plan Advisory Group Roster
September 2023 to September 2027**

No.	Affiliation	Group Type	Member	Alternate
1	American Coatings Association	Business	Rhett Cash	
2	California Air Resources Board (CARB)	Partner Agency	Michael Benjamin	Edie Chang
3	California Alliance of Small Business Associations	Business	Bill La Marr	
4	California Council for Environmental and Economic Balance	Business	Bill Quinn	Christine Wolfe
5	CEA Consulting	Business	Peter Okurowski	
6	Center for Community Action and Environmental Justice (CCEJ)	Environmental/ Community	Ana Gonzalez	Marven Norman
7	Clean Energy	Business	Todd Campbell	Ryan Kenny
8	Clean Water SoCal	Govt. Agency	David Rothbart	Alison Torres
9	Community Environmental Services	Environmental/ Community	Mark Abramowitz	
10	Earthjustice	Environmental/ Community	Adrian Martinez	Fernando Gaytan
11	FuturePorts	Business	Varalakshmi Jayaram	
12	Holland & Knight LLP	Business	Brian Bunger	
13	International Longshore and Warehouse Union (ILWU)	Labor	Marcos R. Holguin	Marvin Fernando Pineda
14	Jet Propulsion Laboratory	Academic/Research	Greg Osterman	
15	Latham & Watkins LLP	Business	John C. Heintz	Jen Garlock
16	Los Angeles Area Chamber of Commerce	Business	Jacqueline Romero	Patricia Torres Bruno
17	Los Angeles County Metropolitan Transportation Authority (LA Metro)	Govt. Agency	Lori Huddleston	
18	Natural Resources Defense Council (NRDC)	Environmental/ Community	David Pettit	Alison Hahm

No.	Affiliation	Group Type	Member	Alternate
19	Orange County Transportation Authority (OCTA)	Govt. Agency	Gregory Nord	
20	Pacific Environment	Environmental/ Community	Dawny'all Heydari	Teresa Bui
21	Pacific Merchant Shipping Association (PMSA)	Business	Thomas Jelenic	Jacqueline Moore
22	RadTech	Business	Rita Loof	
23	Redeemer Community Partnership	Environmental/ Community	Richard Parks	Brittney Lu
24	Riverside County Transportation Commission (RCTC)	Govt. Agency	Jenny Chan	Martha Masters
25	Sierra Club	Environmental/ Community	Yassi Kavezade	
26	South Bay Cities Council of Governments	Govt. Agency	Kim Fuentes	David Leger
27	Southern California Air Quality Alliance	Business	Curtis Coleman	
28	Southern California Association of Governments (SCAG)	Partner Agency	Rongsheng Luo	Lijin Sun
29	Southern California Edison (SCE)	Business	Bethmarie Quiambao	
30	Southern California Gas (SoCalGas)	Business	Daniel McGivney	Jessilyn-Elise K. Davis
31	United States Environmental Protection Agency (U.S. EPA) Region 9	Partner Agency	Ben Machol	Ginger Vagenas
32	Western States Petroleum Association (WSPA)	Business	Ramine Cromartie	Patty Senecal

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BOARD MEETING DATE: September 1, 2023

AGENDA NO. 4

PROPOSAL: Request Approval of Proposed Membership Roster for Scientific, Technical, and Modeling Peer Review Advisory Group

SYNOPSIS: Staff is recommending that membership be granted for the Scientific, Technical, and Modeling Peer Review (STMPR) Advisory Group for a new four-year term. The current term for this Advisory Group is set to expire on September 5, 2023. The STMPR Advisory Group consists of experts in the fields of air quality modeling, atmospheric chemistry and physics, socioeconomic modeling and public health. The primary role of the STMPR Advisory Group is to review scientific and technical approaches needed to develop a future AQMP/SIP aimed at demonstrating attainment of the National Ambient Air Quality Standards. In December 2002, the Blue Ribbon Panel developed recommendations for the STMPR Advisory Group, including the applicable Board Committee. The proposed action seeks to approve suggested membership roster for the STMPR Advisory Group.

COMMITTEE: Mobile Source, August 18, 2023; Recommended for Approval

RECOMMENDED ACTION:

Approve proposed membership roster for the STMPR Advisory Group (Attachment A) for a new four-year term.

Wayne Natri
Executive Officer

SR:IM:SL:MCS

Background

In January 1997, the Board formed six Advisory Groups to provide advice and recommendations to Board Committees and the Board on specific areas of expertise. In December 2002, the Board adopted the Blue Ribbon Panel recommendations regarding the duties and activities of the Advisory Groups. Since then, the STMPR Advisory

Group has contributed to the development of the scientific and technical aspects of the region's AQMPs and have made recommendations concerning emission inventories, photochemical modeling and socioeconomic impacts. Specifically, this advisory group provides critical review of current air quality and socioeconomic modeling techniques, as well as recommendations for proposed new approaches.

The STMPR Advisory Group members are appointed by the Board. The STMPR Advisory Group charter calls for approximately 15 members. The proposed membership for the STMPR Advisory Group is comprised of experts in the fields of air quality modeling, atmospheric chemistry and physics, socioeconomic modeling, and a medical doctor. The previous membership roster for the Advisory Group was approved in September 2019 for a four-year term, expiring in September 2023.

Proposal

Staff is proposing a new membership roster for the STMPR Advisory Group to assist staff with various AQMP/SIP related projects for the new four-year term commencing upon the Board's approval and expiring in September 2027. The proposed membership roster for the STMPR Advisory Group is provided in Attachment A. The roster consists of eight experts in the fields of atmospheric chemistry, physics and air quality modeling, eight experts in the field of socioeconomics, and one physician. The proposed membership roster for the Advisory Group was developed by soliciting nominations from existing Advisory Group members and public members.

The duties of this advisory group will include reviewing and providing feedback on an AQMP/SIP modeling, socioeconomic modeling techniques and making recommendations for and comments on proposed new approaches. The Advisory Group will meet throughout the year at various frequencies (e.g., monthly, quarterly) depending on the plan development schedule.

Resource Impacts

Existing South Coast AQMD resources are adequate to host STMPR Advisory Group meetings.

Attachment

Proposed STMPR Advisory Group Roster

ATTACHMENT A

Proposed Scientific, Technical, and Modeling Peer Review Advisory Group Roster September 2023 to September 2027

No.	Organization	Member	Alternate
1	California Air Resources Board	Dr. Anthony Oliver	
2	California Air Resources Board	Dr. Jeremy Avise	Dr. Chenxia Cai
3	Claremont Graduate University	Dr. Heather Campbell	Dr. Javier Rodriguez
4	Jet Propulsion Laboratory	Dr. Greg Osterman	
5	Self	Eric El-Togby, MD, MPH	
6	Ramboll	Mr. Ralph Morris	
7	Regional Economic Models, Inc.	Dr. Peter Evangelakis	Mr. Billy Leung
8	Southern California Association of Governments	Dr. John Cho	Dr. Mana Sangkapichai
9	University of California, Berkeley	Dr. Reed Walker	
10	University of California, Davis	Dr. Michael Kleeman	
11	University of California, Davis	Dr. Erich Muehlegger	
12	University of California, Irvine	Dr. Alex Gunther	
13	University of California, Los Angeles	Dr. Pablo Saide	
14	University of California, San Diego	Dr. Joshua Graff Zivin	
15	University Corporation for Atmospheric Research	Dr. Kelley Barsanti	
16	US Environmental Protection Agency	Mr. Ken Davidson	
17	US Environmental Protection Agency, Region 9	Dr. Rynda Kay	Dr. William Tsui

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BOARD MEETING DATE: September 1, 2023

AGENDA NO. 5

PROPOSAL: Issue RFP and Execute Contracts for Clean Technology Truck Loaner Program Within Four AB 617 Communities

SYNOPSIS: Through a participatory budgeting process, four Assembly Bill 617 (AB 617) Community Steering Committees prioritized \$16,590,000 of Community Air Protection Program (CAP) funds for a Clean Technology Truck Loaner Program. The four AB 617 communities include: 1) East Los Angeles, Boyle Heights, West Commerce; 2) San Bernardino, Muscoy; 3) Southeast Los Angeles; and 4) Wilmington, Carson, West Long Beach. The AB 617 Clean Technology Truck Loaner Program will allow truck owners and operators in these communities to rent zero-emission (ZE) trucks at a minimal cost. These actions are to: 1) issue an RFP to establish a list of eligible vendors to offer end-to-end short-term ZE truck rental services to owners and operators residing and operating in the four AB 617 communities; 2) authorize the Executive Officer to execute subsequent contracts with vendors to provide short-term rental services to eligible applicants participating in the AB 617 Clean Technology Truck Loaner Program in an amount not to exceed \$16,590,000 from the CAP AB 134 Fund (77); 3) reimburse the General Fund for administrative costs up to \$1,032,875 from the CAP AB 134 Fund (77) for staff time to implement the AB 617 Clean Technology Truck Loaner Program; and 4) transfer and appropriate up to \$4,000 from the administrative portion of CAP AB 134 Fund (77) into Technology Advancement's FY 2023-24 Budget, Services and Supplies Major Object, Public Notice and Advertisement account for administrative costs to implement the AB 617 Clean Technology Truck Loaner Program.

COMMITTEE: Technology, August 18, 2023; Recommended for Approval

RECOMMENDED ACTIONS:

1. Authorize the Procurement Manager, in accordance with South Coast AQMD Procurement Policy and Procedure, to issue RFP #P2024-01 to establish a list of eligible vendors to offer end-to-end short-term ZE medium- and heavy-duty on-road truck rental services to owners and operators residing in the Assembly Bill 617 (AB 617) communities of East Los Angeles, Boyle Heights, West Commerce; San Bernardino, Muscoy; Southeast Los Angeles; and Wilmington, Carson, West Long Beach;
2. Based on the results of the RFP, authorize the Executive Officer to execute subsequent contracts with vendors to provide short-term rental services to eligible applicants participating in the AB 617 Clean Technology Truck Loaner Program in an amount not to exceed \$16,590,000 from the Community Air Protection Program (CAP) AB 134 Fund (77);
3. Reimburse the General Fund for administrative costs of up to \$1,032,875 from the Community Air Protection AB 134 Fund (77) for staff time to implement the AB 617 Clean Technology Truck Loaner Program; and
4. Transfer and appropriate up to \$4,000 from the administrative portion of the Community Air Protection AB 134 Fund (77) into Technology Advancement's FY 2023-24 Budget, Services and Supplies Major Object, Public Notice and Advertisement account for administrative costs to implement the AB 617 Clean Technology Truck Loaner Program.

Wayne Nastri
Executive Officer

AK:MW:DG:PG

Background

In July 2017, AB 617 was signed into state law, focusing on improving air quality and reducing exposure to criteria air pollutants and toxic air contaminants in overburdened communities disproportionately impacted by air pollution. AB 617 recognizes the disproportionate impacts environmental justice (EJ) communities experience from sources of air pollution near residences and seeks to address these impacts through community-driven actions focused on developing and implementing community emissions reduction plans (CERPs) and community air monitoring plans (CAMPs).

In 2021 through a participatory budgeting process to allocate a portion of Year 3 Community Air Protection (CAP) incentive funds of \$36.7 million to community-identified projects in AB 617 communities, four Community Steering Committees (CSCs) prioritized funding for an AB 617 Clean Technology Truck Loaner Program. The four AB 617 communities include: 1) East Los Angeles, Boyle Heights, West

Commerce; 2) San Bernardino, Muscoy; 3) Southeast Los Angeles; and 4) Wilmington, Carson, West Long Beach. Each of the CSCs are comprised of stakeholders (e.g., residents, local community groups, and local businesses) with community knowledge and provide input and guidance for implementing the CERPs and CAMPs. The CSCs opted to set aside \$16.59 million for ZE trucks and equipment to reduce NOx and diesel particulate matter (DPM) emissions by introducing ZE medium- and heavy-duty on-road trucks. The table below summarizes each CSC's funding priorities for ZE trucks and equipment and associated CERP measures.

Community	Project Type	Year 3 CAP Incentives Allocation	CERP Measure
East Los Angeles, Boyle Heights, West Commerce	ZE Trucks	\$1.84 million	Identify South Coast AQMD and other additional incentive funding opportunities to accelerate adoption of cleaner equipment and trucks
San Bernardino, Muscoy	ZE Trucks	\$5 million	Continue to support the accelerated adoption and prioritization of ZE technology based on feasibility, availability, and cost-effectiveness
	ZE Equipment and Infrastructure	\$2 million	Collaborate with local governments, utilities, and local and state entities to promote the installation of fueling infrastructure needed to support ZE trucks/vehicles, transport refrigeration units and cargo handling equipment
Southeast Los Angeles	ZE Trucks	\$5 million	Encourage the deployment of ZE trucks where commercially available ²
Wilmington, Carson, West Long Beach	ZE Trucks	\$2.75 million	Identify additional and new incentive funding opportunities to replace and accelerate adoption of cleaner heavy-duty trucks (including drayage trucks), prioritizing ZE technologies when technologically feasible and commercially available, and near-zero emission technologies until that time

In March 2023, CARB approved the AB 617 Clean Technology Truck Loaner Program Project Plan. The CARB-approved project plan allows South Coast AQMD to allocate CAP incentive funds to provide short-term zero-emission truck rentals in the East Los Angeles, Boyle Heights, West Commerce; San Bernardino, Muscoy; Southeast Los Angeles; and Wilmington, Carson, West Long Beach communities. Staff developed the plan with participating communities, potential vendors, and interested stakeholders throughout five workshops. Additionally, workshop participants provided input on the RFP requirements, such as the type of trucks covered by the program, the duration of the rental period, insurance requirements,

infrastructure availability, and costs. Further, staff established a dedicated webpage for the program that includes contact information for questions or concerns. The webpage can be accessed at: <http://www.aqmd.gov/home/programs/business/community-air-protection-incentives/truck-incentives-workplan>

Proposal

This action is to authorize the Procurement Manager to issue RFP #P2024-01 to develop a list of eligible vendors to provide end-to-end short-term ZE truck rental services to owners and operators residing in the East Los Angeles, Boyle Heights, West Commerce; San Bernardino, Muscoy; Southeast Los Angeles; and Wilmington, Carson, West Long Beach Community Boundaries through the AB 617 Clean Technology Truck Loaner Program.

Based on the results of the RFP, this action is to authorize the Executive Officer to execute subsequent contracts with vendors to provide short-term rental services to eligible applicants participating in the Program. Bidders selected through the RFP process will provide truck rental services that meet the requirements and criteria set forth within the approved AB 617 Clean Technology Truck Loaner Program Project Plan available at http://www.aqmd.gov/docs/default-source/tao-capp-incentives/ab-617-clean-technology-truck-loaner-project-plan_03-2023.pdf?sfvrsn=9. Proposals for eligible vendors will be due by 2:00 pm, Tuesday, October 31, 2023.

Following contract execution, the selected vendors will release a Program Announcement to accept applications to participate in the AB 617 Clean Technology Truck Loaner Program. The program will prioritize drayage operators and small fleet owners and operators in the participating four AB 617 Communities. The goal is to familiarize fleet owners and operators in these communities with ZE technology to accelerate their adoption of ZE trucks and equipment. Staff anticipates vendors to begin accepting applications from truck owners and operators in the participating communities within the first half of 2024.

To implement the Program, these actions are to also reimburse the General Fund for administrative costs of up to \$1,032,875 from the Community Air Protection AB 134 Fund (77); and transfer and appropriate up to \$4,000 from the administrative portion of the Community Air Protection AB 134 Fund (77) into Technology Advancement's FY 2023-24 Budget, Services and Supplies Major Object, Public Notice and Advertisement account.

Outreach

In accordance with South Coast AQMD's Procurement Policy and Procedure, a public notice advertising the RFP 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 South Coast AQMD's own electronic listing of certified minority vendors. Notice of the RFP will be emailed to the Black and Latino Legislative Caucuses and various minority chambers of commerce and business associations and placed on South Coast AQMD's website (<http://www.aqmd.gov>) where it can be viewed by making the selection "Grants & Bids."

In addition, South Coast AQMD staff will coordinate closely with selected vendors and community partners to conduct outreach to truck owners and operators in the four CSCs, informing them about the AB 617 Clean Technology Truck Loaner Program. These outreach efforts will include announcements at CSC meetings, flyers, and notifications that will be shared with the vendor's contacts in each community and through electronic AB 617 distribution lists established by staff since the inception of the AB 617 Program.

Benefits to South Coast AQMD

Health studies have determined that criteria pollutants such as NO_x and DPM present significant air pollution health risks, especially to sensitive receptors in EJ communities. The AB 617 Clean Technology Truck Loaner Program will contribute to reducing NO_x and DPM exposure for truck operators, residents, and businesses within the East Los Angeles, Boyle Heights, West Commerce; San Bernardino, Muscoy; Southeast Los Angeles; and Wilmington, Carson, West Long Beach communities.

Resource Impacts

Up to \$16,590,000 from the CAP AB 134 Fund (77) Year 3 CAP funds will be used to provide short-term ZE on-road truck rentals to owners and operators residing in ELABHWC (\$1,840,000), SBM (\$7,000,000), SELA (\$5,000,000) and WCWLB (\$2,750,000) communities for the AB 617 Clean Technology Truck Loaner Program, reimbursement of administrative costs will not exceed \$1,032,875 for staff time to implement the AB 617 Clean Technology Truck Loaner Program, and a transfer of up to \$4,000 from the administrative portion of Community Air Protection AB 134 Fund (77) into Technology Advancement's FY 2023-24 Budget, Services and Supplies Major Object, Public Notice and Advertisement account. Sufficient funds are available in CAP AB 134 Fund (77).

Attachment

RFP #P2024-01



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
REQUEST FOR PROPOSALS
FOR AB 617 CLEAN TECHNOLOGY
TRUCK LOANER PROGRAM
P2024-01

South Coast Air Quality Management District (South Coast AQMD) 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," "Consultant," "Bidder" and "Firm" are used interchangeably.

PURPOSE

South Coast AQMD is pleased to announce a Request for Proposals (RFP) to solicit qualified vendors to provide end-to-end short-term truck rental services for zero-emission medium- and heavy-duty on-road trucks. The purpose of the Assembly Bill (AB) 617 Clean Technology Truck Loaner Program is to provide fleet owners and operators that reside and operate in participating AB 617 Communities the opportunity to experience zero-emission trucks for a short period in their regular transport and cargo businesses at little to no cost. The main objective is to enable these fleet owners and operators to use the program to assess the suitability of zero-emission medium- and heavy-duty trucks for their operations.

Fleet owners and operators residing and operating in the following participating AB 617 Communities¹ may be eligible for the program.

- [East Los Angeles, Boyle Heights, West Commerce \(ELABHWC\) – Clickable link](#)
- [Southeast Los Angeles \(SELA\) – Clickable link](#)
- [San Bernardino, Muscoy \(SBM\) – Clickable link](#)
- [Wilmington, Carson, West Long Beach \(WCWLB\) – Clickable link](#)

Up to \$16,590,000 is currently available to implement the AB 617 Clean Technology Truck Loaner Program. However, due to the indefinite nature of the work, the actual contract amount for any selected eligible vendor cannot be determined at this time.

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

¹ The URL to each community boundary for AB 617 Communities participating in the AB 617 Clean Technology Truck Loaner Program is listed below.

ELABHWC – <https://scagmd-online.maps.arcgis.com/apps/View/index.html?appid=3e6b40c9a9d94d01bf8d1cc02767370c&extent=-118.2963.33.9664,-118.0650.34.0778>

SELA – <https://scagmd-online.maps.arcgis.com/apps/webappviewer/index.html?id=b0749c91fbeb4657985e8d5dddbee67c>

SBM – <https://scagmd-online.maps.arcgis.com/apps/View/index.html?appid=c1c170ab526d462199b86c1cbe5a9ac5&extent=-117.4450.34.0601,-117.1155.34.1933>

WCWLB – <https://scagmd-online.maps.arcgis.com/apps/View/index.html?appid=534f48ca127c430abb1a5f4f6e86cf00&extent=-118.5536.33.6686,-117.8945.33.9359>

Section VII [Proposal Submittal Requirements](#)
 Section VIII [Proposal Submission](#)
 Section IX [Proposal Evaluation/Contractor Selection Criteria](#)
 Section X [Sample Contract](#)

Attachment A [Participation in the Procurement Process](#)
 Attachment B [Certifications and Representations](#)
 Attachment C [Project Specifications and Pricing](#)

SECTION I: BACKGROUND/INFORMATION

South Coast AQMD is the air pollution control agency for the South Coast Air Basin, which is comprised of all of Orange County and the urban portions of Los Angeles, Riverside, and San Bernardino counties. This area of 10,743 square miles is home to approximately 17 million people and is the second most populated area in the United States.

AB 617 addresses air pollution in environmental justice (EJ) communities. Since 2018 the California Air Resources Board (CARB) has selected six communities in the South Coast AQMD to participate in the AB 617 Program. Each AB 617 Community has a Community Steering Committee (CSC). The CSCs advise South Coast AQMD on developing and implementing a Community Emissions Reduction Plan (CERP) for their respective community. Further, the CERP sets forth strategies, actions, and goals to reduce emissions and exposure to air pollution in the community.

Through a participatory budgeting process, four of the six AB 617 CSCs prioritized Community Air Protection Program (CAPP) Incentive funds to deploy zero-emission trucks, zero-emission equipment and infrastructure to their communities. These four CSCs and the respective funds they allocated to these priorities are listed below.

AB 617 Community	Funding Priority	Total Funding Available
ELABHWC	Zero Emission Trucks	\$1,840,000
SBM	<ul style="list-style-type: none"> o Zero Emission Trucks (\$5,000,000) o Warehouse Zero Emission Equipment and Infrastructure (\$ 2,000,000) 	\$7,000,000
SELA	Zero Emission Trucks	\$5,000,000
WCWLB	Zero Emission Trucks	\$2,750,000

As a result, South Coast AQMD anticipates allocating \$16,590,000 to implement the Clean Technology Truck Loaner Program for one year in these four communities. The contractors selected from this Request for Proposal (RFP) will support the Clean Technology Truck Loaner Program Project Plan (available at http://www.aqmd.gov/docs/default-source/tao-capp-incentives/ab-617-truck-incentives-project-plan_02-2023.pdf?sfvrsn=6) and prioritize end-to-end truck rental services to drayage operators and small fleet owners and operators within the ELABHWC, SELA, SBM, and WCWLB communities. Funding allocations for this program must be consistent with the table above.

All rental services and its participating trucks must meet the specifications detailed in Section VI of this RFP. This is an RFP only and is not an issue of award or purchase. Funding allocation is subject to change at South Coast AQMD’s discretion. All proposals must meet the specifications detailed in Section III of this RFP. The bidder must provide pricing based

on specifications detailed in Attachment C of this RFP. Quotes shall be valid until *June 30, 2025*.

SECTION II: CONTACT PERSON

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

Charlize Li
Air Quality Specialist
 South Coast AQMD
 21865 Copley Drive
 Diamond Bar, CA 91765-4178
 (909) 396-2473

SECTION III: SCHEDULE OF EVENTS

Date	Event
September 1, 2023	RFP Released
October 5, 2023	Online Bidder's Conference*
October 31, 2023	Proposals Due to South Coast AQMD - No Later Than 2:00PM
November 14, 2023	Proposal Evaluations
December 2023	Anticipated Contract Execution

*Participation in the Online Bidder's Conference is optional. Such participation would assist in notifying potential Bidders of any updates or amendments. The Bidder's Conference will be hosted on Zoom at 3:00 PM on Thursday, October 5, 2023. Please contact Ping Gui at pgui@aqmd.gov by close of business on Friday, September 15, 2023, if you plan to attend.

Online Bidders Conference will only be conducted via video conferencing and by telephone. Please follow the instructions below to join the webinar meeting remotely, teleconference locations do not need to be disclosed nor open to the public.

INSTRUCTIONS FOR ELECTRONIC PARTICIPATION

Join Zoom Webinar Meeting - from PC or Laptop

<https://scaqmd.zoom.us/j/91454843575>

Zoom Webinar ID: 914 5484 3575 (applies to all)

Teleconference Dial In +1 669 900 6833

One tap mobile +16699006833,, 91454843575#

SECTION IV: PARTICIPATION IN THE PROCUREMENT PROCESS

It is the policy of South Coast AQMD 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 South Coast AQMD contracts. Attachment A to this RFP contains definitions and further information.

SECTION V: STATEMENT OF WORK/SCHEDULE OF DELIVERABLES

The purpose of the Clean Technology Truck Loaner Program is to provide opportunities for truck owners and operators within AB 617 Environmental Justice Communities to assess the

suitability of zero-emission medium- and/or heavy-duty trucks (Gross Vehicle Weight Rating greater than 14,000 lbs.) for their routine business operations by allowing them to utilize zero emission trucks for a period in their business operations. These activities exclude truck owners' and operators' irregular transportation needs (e.g., one-off moves to accommodate one-time cargo).

This project requires the following tasks:

1. Quarterly meetings with South Coast AQMD staff to discuss program logistics and implementation
2. End-to-end rental services, including application processing
3. Insurance and background check services
4. Maintenance and roadside assistance services
5. Charging services or hydrogen fueling
6. Training and application assistance services
7. Outreach

Potential bidders should address all tasks based on their background and expertise in their proposal based on the format provided in Section VII – Proposal Submittal Requirements. The six tasks listed below are integral to maximizing program participation and providing a streamlined and positive consumer experience. Proposals submitted may separately address Tasks 1 through 8.

Statement of Work

The selected contractor(s) shall perform assignments on an as-needed basis upon receiving written notification from South Coast AQMD. Each assignment will have specific tasks to be conducted and resources to be utilized. No work can be implemented without South Coast AQMD authorization. Tasks include the following:

Task 1 – Quarterly Meetings with South Coast AQMD Staff to Discuss Program Logistics and Implementation

All contracting parties shall meet with South Coast AQMD staff at the beginning of project implementation to discuss and establish program coordination details, including outreach, training, a chain of command, responsibilities, contacts, timelines, and other logistics before working on Tasks 2 through 7. South Coast AQMD staff will guide the contractor on written materials and procedures necessary to meet program goals. Additionally, all contracting parties shall meet with South Coast AQMD staff quarterly throughout project implementation (i.e., until funds are fully liquidated). At these quarterly meetings, the contractor shall provide a verbal and written report of the following:

- All application documentation (e.g., application forms, approvals, etc.),
- Program implementation (e.g., number and type of loaner trucks participating in the program, miles traveled per truck, training conducted, etc.),
- Matters impacting program implementation (e.g., logistical issues), and
- Suggestions for program improvements.

Task 2 – End-to-End Renting Services

Selected contractor(s) will be responsible for releasing a Program Announcement (PA) to solicit applications. The PA must clearly state the purpose of the Clean Truck Loaner Program provided above, establish guidelines and requirements for applicant eligibility and include, at a minimum:

- Program detail/criteria
- Applicant requirements/criteria
- Funding cap per project, if any
- Eligible and non-eligible costs
- Project term
- Project ranking/selection process
- Return of funds for non-complying projects
- Certifications and representations
- Handling of backup list projects in the event of solicitation oversubscription

The selected contractor(s) will also conduct application evaluations and the timely execution of end-to-end renting services to multiple applicants within participating AB 617 communities. The application evaluation process must prioritize drayage operators and small fleet owners and operators within participating AB 617 communities.

In addition, the contractor shall provide updated information regarding the status, timing, and rental confirmation for each program participant and resolve any issues with delays. Sections VI and VII of this RFP further outline requirements for the renting services.

Task 3 – Insurance, Damage, and Loss Services

The selected contractor(s) shall offer insurance to program participants for the entire rental period. At a minimum, insurance should cover equipment damage (vehicle and infrastructure), third party damages, cargo damages, and all injury claims. In addition, the contractor shall garner background information to ensure the legal and safe operation of vehicles. Examples of background information include a valid license to operate the rental vehicle class, liability and termination agreements, indemnifications, waivers, and other information.

Task 4 – Maintenance and Roadside Assistance Services

The selected contractor(s) shall provide complete (i.e., 100%) vehicle maintenance of the rental trucks and 24/7 roadside assistance to program participants. If a rental truck is inoperable, the contractor(s) shall recover the truck and provide a similar operable truck to the participant in a timely manner. In their proposal, the vendor must define the response time to offer a similar operable truck. The response time to provide a similar operable truck must be defined in the proposal. The contractor shall submit all maintenance and roadside assistance records to South Coast AQMD quarterly.

Task 5 – Charging Services or Hydrogen Fueling

The selected contractor(s) shall provide charging or hydrogen fueling services available that ensure all truck rentals issued to participants are fully charged upon delivery and provide access to charging or hydrogen stations throughout the rental service term. Further, the contractor shall inform program participants about accessible charging or hydrogen fueling stations along transportation corridors within South Coast AQMD.

Task 6 – Training Services

The selected contractor(s) shall provide program applicants with training and education on the zero-emission vehicle operation and safety.

Task 7 – Outreach

The selected contractor(s) shall provide outreach to inform the above AB 617 Communities about the AB 617 Clean Technology Truck Loaner Program. Outreach must include at least one workshop presentation in the focused community along with digital handouts and flyers informing residents and potential business users about program participation. Additionally, the selected contractor(s) must distribute information to the program participants about local, state, and federal incentives opportunities for clean trucks (e.g., digital flyers, brochures, and other resources).

Task 8 – Toll Free Hotline

The selected contractor(s) shall provide program applicants with a 24-hour toll free hotline for application, maintenance, roadside assistance, questions, and other operational needs/services.

Schedule of Deliverables

South Coast AQMD will establish deliverables and schedules for task completion in writing when each task is authorized. Deliverables include preparing quarterly reports detailing truck rental activities (e.g., number of trucks rented, documentation of issues encountered, warranty replacements or repairs, and other program implementation measures).

SECTION VI: REQUIRED QUALIFICATIONS

- A. An interested bidder shall provide Attachment C, a proposed pricing quote for the rentals, fees/taxes, insurance, maintenance, roadside assistance, charging, training, and any administrative fees.

The rental trucks must meet the following specifications for consideration and evaluation under this RFP. Only rental trucks that meet these specifications are eligible under this RFP. The specifications below are the minimum acceptable by South Coast AQMD.

B. Minimum Specifications:

1. The loaner trucks shall be zero-emission (hydrogen fuel cell or battery electric) medium- and/or heavy-duty trucks as established by the trucks' gross vehicle weight rating (GVWR).
2. The loaner trucks shall be certified to legally operate in California and be commercially available for purchase.
3. The contractor(s) shall provide proof of regulatory compliance and/or valid operating permit/registration if any.
4. The loaner trucks shall comply with CARB Community Air Protection Incentives Guidelines.
5. The loaner trucks shall demonstrate compliance with all applicable Federal, State, or local requirements.
6. The loaner trucks shall comply with local air district requirements (including monitoring and/or reporting requirements) during the project term.
7. The contractor shall maintain all funded technology to manufacturer's specifications for the project term.
8. The contractor shall quantify all emission reductions attributed to the Clean Technology Truck Loaner Program for the project term. The emissions reductions shall account for the operators forgoing the use of their truck for a ZE truck during the loaner period.
9. The contractor(s) shall ensure accessibility for inspections if requested by South Coast AQMD and/or CARB during the project term.

- C. **Additional Features:** South Coast AQMD will also consider the following features in the evaluation of the product:

1. Availability of rental and service locations within or nearby eligible AB 617 communities
2. Availability of infrastructure locations within or nearby eligible AB 617 communities to accommodate truck charging and parking
3. Selection of zero-emission medium- and/or heavy-duty trucks
4. Condition of eligible rental trucks
5. Affordability of end-to-end rental packages
6. Vendor incentives to transition program participants to zero-emissions trucks (e.g., opportunities for program participants to purchase trucks within the program at a discount)

D. **Warranty:** Manufacturer warranties will be provided directly from the truck manufacturer. South Coast AQMD does not provide any additional warranty for the truck.

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. South Coast AQMD may modify the RFP or issue supplementary information or guidelines during the proposal preparation period prior to the due date. Please check our website for updates (<http://www.aqmd.gov/grants-bids>). The cost for developing the proposal is the responsibility of the bidder and shall not be chargeable to South Coast AQMD.

Each proposal must be submitted in three separate volumes:

- **Volume I** - Technical Proposal
- **Volume II** - Cost Proposal, including Attachment C
 - Bidder must submit Attachment C for a package containing at a minimum a proposed pricing quote for vehicle rentals, fees/taxes, insurance, maintenance, charging, training, outreach, and any administrative fees.
 - In addition to the primary submission, a bidder may submit up to five (5) alternate packages (Attachment C) for consideration.
 - All submissions that meet the minimum specification will be evaluated on the same criteria.
- **Volume III** - Certifications and Representations included in Attachment B to this RFP, must be completed and executed by an authorized official of the Contractor.

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

A separate cover letter should accompany the proposal submission. The cover letter should include the following:

- a. Name, address, and telephone number of the company and must be signed by the person(s) authorized to represent the firm. Also include the name and contact information, including email address of the firm's representative designated as the main contact.
- b. *Quote Validity:* Acknowledgement that the pricing for the proposed packages will be valid through June 30, 2025. Section VII, Volume II of this RFP details pricing requirements and truck specifications.

- c. *Availability Guarantee*: Include a guarantee that rental trucks will be available to program participants on the date and time scheduled and is ready for immediate use. The vendor will incur a 10 percent (%) rental cost penalty for all instances where trucks are not available during date and time scheduled.
- d. *Warranty*: South Coast AQMD requires a minimum 3-year or 50,000-mile manufacturer warranty for zero-emission trucks covering the motor, drivetrain, battery or energy storage, and parts/labor. South Coast AQMD does not offer additional warranty for the trucks. In addition, the bidder must describe how they will address complaints and issues about defective truck components during the lifetime of the truck's warranty.
- e. *Additional Data*: Provide other essential data that may assist in the evaluation of the quote (e.g., small business certification, etc.).

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 completing the project (to include reports) within the total time allowed.

Qualifications (Section C) – Describe the Firm's technical capabilities. Provide references of other similar projects performed during the last five years demonstrating ability to successfully complete the work. Include contact name, title, and telephone number for any references listed. Provide a statement of your Firm's background and related experience in performing similar services for other governmental organizations, if applicable.

Assigned Personnel (Section D) – Provide the following information about the staff to be assigned to this project:

1. List all key personnel assigned to the project by level, name and location. Provide a resume or similar statement describing the background, qualifications and experience 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 South Coast AQMD.
2. Provide a statement indicating whether 90% of the work will be performed within the geographical boundaries of South Coast AQMD.
3. 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 E) – This project may require expertise in multiple technical areas. List any subcontractors that will be used, identifying functions to be performed by them, their related qualifications and experience and the total number of hours or percentage of time they will spend on the project.

Conflict of Interest (Section F) – Address possible conflicts of interest with other clients affected by actions performed by the Firm on behalf of South Coast AQMD. South Coast AQMD recognizes that prospective Contractors may be performing similar projects for other clients. Include a complete list of such clients for the past three (3) years with the type of work

performed and the total number of years performing such tasks for each client. Although the Proposer will not be automatically disqualified by reason of work performed for such clients, South Coast AQMD reserves the right to consider the nature and extent of such work in evaluating the proposal.

Additional Data (Section G) – 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 – South Coast AQMD anticipates awarding a fixed price contract. Cost information must be provided as listed below:

1. Specifications and Pricing – Complete a separate form, Attachment C, for each proposed package. A package must include at a minimum a proposed pricing quote for rentals, fees/taxes, insurance, maintenance, charging, training, outreach, and any administrative fees.
 - a) *Service Specifications* – Complete Section A of Attachment C, with details of the proposed services for each package. A package must include at a minimum end-to-end rental service for zero-emission medium- and/or heavy-duty trucks along with providing parking and fueling/charging for the trucks.
 - b) *Pricing* – Complete Section B of Attachment C with proposed pricing for each package. A package must include at a minimum a proposed pricing quote for truck rentals, truck details, fees/taxes, insurance, maintenance, charging or fueling, training, outreach, and any administrative fees. Duration for the proposed package also needs to be specified in the pricing.
 - c) *Availability* – Complete Section C of Attachment C to demonstrate availability of zero- emission medium- and/or heavy-duty trucks for short-term renting and charging or fueling.

2. It is the policy of South Coast AQMD to receive at least as favorable pricing, warranties, conditions, benefits and terms as other customers or clients receiving similar services. South Coast AQMD will give preference, where appropriate, to vendors who certify that they will provide “most favored customer” status to South Coast AQMD. To receive preference points, Proposer shall certify that South Coast AQMD is receiving “most favored customer” pricing in the Business Status Certifications page of Volume III, Attachment B – Certifications and Representations.

VOLUME III – CERTIFICATIONS AND REPRESENTATIONS (see Attachment B to this RFP)

SECTION VIII: PROPOSAL SUBMISSION

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

Signature – All proposals must be signed by an authorized representative of the Proposer.

Due Date – **All proposals are due no later than 2:00pm October 31, 2023, and should be directed to:**

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

Submittal – Submit two (2) complete copies of the proposal along with a USB flash drive containing a digital copy 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 P2024-01."

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, or
- The trucks do not meet the class classification, or
- The loaner trucks are not in compliance with Local, State, and Federal regulations.

Modification or Withdrawal – Once submitted, proposals cannot be altered without the prior written consent of South Coast AQMD. 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. 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. (a) Standardized Services:

Criteria	Description	Points
Cost	Total Cost of the rental service including the number and types of trucks along with duration of the package	40
Infrastructure	Infrastructure for charging or fueling	30
Maintenance and 24/7 Roadside Assistance	Maintenance of the trucks are current and roadside assistance service	10
Training Program	Vehicle operation and safety	10
Outreach	Outreach eligible program participants	10
Total		100

(b) Additional Points:

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

The cumulative points awarded for small business, DVBE, use of small business or DVBE subcontractors, Zero or Near-Zero emission vehicle business, local business, and off-peak hours delivery business shall not exceed 15 points. Most Favored Customer status incentive points shall be added, as applicable for a total of 17 points.

Self-Certification for Additional Points

The award of these additional points shall be contingent upon Proposer completing the Self-Certification section of Attachment B – 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 at the time of proposal submission certifying that the proposer meets the requirements set forth in Attachments A and B. 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 Zero or Near-Zero Emission Vehicle Business, the proposer must demonstrate to the Executive Officer, or designee, that supplies and materials delivered to South Coast AQMD are delivered in vehicles that operate on clean-fuels. To receive points as a Local Business, the proposer must affirm that it has an ongoing business within the South Coast AQMD at the time of bid/proposal submittal and that 90% of the work related to the contract will be performed within the South Coast AQMD. Proposals for legislative representation, such as in Sacramento, California or Washington D.C. are not eligible for local business incentive points. Federally funded projects are not eligible for local business incentive points. 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 South Coast AQMD 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 South Coast AQMD. The cumulative points awarded for Small Business, DVBE, use of Small Business or DVBE Subcontractors, Local Business, Zero or Near- Zero Emission Vehicle Business, Off-Peak Hour Delivery Business and Most Favored Customer shall not exceed 17 points.

3. 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 \$100 and the maximum points available are 30 points, this proposal would receive the full 30 points. If the next lowest cost proposal is \$300 it would receive 27 points reflecting the fact that it is 10% higher than the lowest cost (90% of 30 points = 27 points).
- B. 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 South Coast AQMD.
 - C. 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 South Coast AQMD 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.
 - D. 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.
 - E. 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 South Coast AQMD 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 South Coast AQMD Procurement Department.
 - F. 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.
 - G. 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.
 - H. Disposition of Proposals – Pursuant to South Coast AQMD’s Procurement Policy and Procedure, South Coast AQMD reserves the right to reject any or all proposals. All proposals become the property of South Coast AQMD and are subject to the California Public Records Act. One copy of the proposal shall be retained for South Coast AQMD files. Additional copies and materials will be returned only if requested and at the proposer's expense.
 - I. **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 B. Proposal submittal will be deemed as non-responsive and Bidder may be disqualified if Contractor Registration No. is not included in Attachment B. 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, 1725, 1777, 1813 and 1815.**

SECTION X: SAMPLE CONTRACT

A sample contract to carry out the work described in this RFP is available on South Coast AQMD's website at <http://www.aqmd.gov/grants-bids> or upon request from the RFP Contact Person (Section II).

ATTACHMENT A

PARTICIPATION IN THE PROCUREMENT PROCESS

A. It is the policy of South Coast Air Quality Management District (South Coast AQMD) 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 South Coast AQMD 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, Zero or Near-Zero 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 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 South Coast AQMD at the time of bid or proposal submittal and performs 90% of the work related to the contract within the geographical boundaries of South Coast AQMD and satisfies the requirements of subparagraph H below. Proposals for legislative representation, such as in Sacramento, California or Washington D.C. are not eligible for local business incentive points.
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. "Zero or Near-Zero Emission Vehicle Business" as used in this policy means a company or contractor that uses Zero or Near-Zero emission vehicles in conducting deliveries to South Coast AQMD. Zero or Near-Zero emission vehicles include vehicles powered by electric, compressed natural gas (CNG), liquefied natural gas (LNG), liquefied petroleum gas (LPG), ethanol, methanol and hydrogen and are certified to 90% or lower of the existing standard.
8. "Off-Peak Hours Delivery Business" as used in this policy means a company or contractor that commits to conducting deliveries to South Coast AQMD 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 South Coast AQMD 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 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. "Most Favored Customer" as used in this policy means that South Coast AQMD will receive at least as favorable pricing, warranties, conditions, benefits and terms as other customers or clients making similar purchases or receiving similar services.
 12. "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. Zero or Near-Zero 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. 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, 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. Zero or Near-Zero 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. Businesses offering Most Favored Customer status shall be awarded two (2) points in the evaluation process.
- E. South Coast AQMD 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 South Coast AQMD contractual obligations.
- F. South Coast AQMD 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. South Coast AQMD 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 South Coast AQMD. 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 South Coast AQMD shall be entitled to the local business preference. Proposals for legislative representation, such as in Sacramento, California or Washington D.C. are not eligible for local business incentive points.
- J. In compliance with federal fair share requirements set forth in 40 CFR Part 33, South Coast AQMD shall establish a fair share goal annually for expenditures with federal funds covered by its procurement policy.

ATTACHMENT B

Business Forms



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • www.aqmd.gov

Business Information Request

Dear South Coast AQMD Contractor/Supplier:

South Coast Air Quality Management District (South Coast AQMD) 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, remember to sign all 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,

Sujata Jain
Chief Financial Officer

DH:nd

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



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • 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

BUSINESS STATUS CERTIFICATIONS

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 South Coast AQMD, _____ (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 South Coast AQMD 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 | <input type="checkbox"/> Most Favored Customer Pricing Certification |

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.

NAME

TITLE

TELEPHONE NUMBER

DATE

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 South Coast AQMD at the time of bid application.
- performs 90 percent of the work within South Coast AQMD’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.

Most Favored Customer as used in this policy means that South Coast AQMD will receive at least as favorable pricing, warranties, conditions, benefits and terms as other customers or clients making similar purchases or receiving similar services.

Form **W-9**
(Rev. October 2018)
Department of the Treasury
Internal Revenue Service

Request for Taxpayer Identification Number and Certification

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

Go to www.irs.gov/FormW9 for instructions and the latest information.

1 Name (as shown on your income tax return). Name is required on this line; do not leave this line blank.

2 Business name/disregarded entity name, if different from above

3 Check appropriate box for federal tax classification of the person whose name is entered on line 1. Check only **one** of the following seven boxes.

Individual/sole proprietor or single-member LLC C Corporation S Corporation Partnership Trust/estate

Limited liability company. Enter the tax classification (C=C corporation, S=S corporation, P=Partnership) ▶ _____

Note: Check the appropriate box in the line above for the tax classification of the single-member owner. Do not check LLC if the LLC is classified as a single-member LLC that is disregarded from the owner unless the owner of the LLC is another LLC that is **not** disregarded from the owner for U.S. federal tax purposes. Otherwise, a single-member LLC that is disregarded from the owner should check the appropriate box for the tax classification of its owner.

Other (see instructions) ▶ _____

4 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) _____

(Applies to accounts maintained outside the U.S.)

5 Address (number, street, and apt. or suite no.) See instructions.

6 City, state, and ZIP code

7 List account number(s) here (optional)

Requester's name and address (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 instructions for Part I, later. For other entities, it is your employer identification number (EIN). If you do not have a number, see *How to get a TIN*, later.

Note: If the account is in more than one name, see the instructions for line 1. Also see *What Name and Number To Give the Requester* for guidelines on whose number to enter.

Social security number

____ - ____ - _____

or

Employer identification number

____ - _____

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 for Part II, later.

Sign Here Signature of U.S. person ▶ _____ Date ▶ _____

General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

Future developments. For the latest information about developments related to Form W-9 and its instructions, such as legislation enacted after they were published, go to www.irs.gov/FormW9.

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, later.

By signing the filled-out form, you:

1. Certify that the TIN you are giving is correct (or you are waiting for a number to be issued),
2. Certify that you are not subject to backup withholding, or
3. 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
4. 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*, later, 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; or
- 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 Pub. 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 24% 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 instructions for Part II 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*, later, and the separate instructions for the Requester of Form W-9 for more information.

Also see *Special rules for partnerships*, earlier.

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*, later, 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 (other than an account maintained by a foreign financial institution (FFI)), list first, and then circle, the name of the person or entity whose number you entered in Part I of Form W-9. If you are providing Form W-9 to an FFI to document a joint account, each holder of the account that is a U.S. person must provide a 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 on line 3 for the U.S. federal tax classification of the person whose name is entered on line 1. Check only one box on line 3.

IF the entity/person on line 1 is a(n) . . .	THEN check the box for . . .
• Corporation	Corporation
• Individual • Sole proprietorship, or • Single-member limited liability company (LLC) owned by an individual and disregarded for U.S. federal tax purposes.	Individual/sole proprietor or single-member LLC
• LLC treated as a partnership for U.S. federal tax purposes, • LLC that has filed Form 8832 or 2553 to be taxed as a corporation, or • LLC that is disregarded as an entity separate from its owner but the owner is another LLC that is not disregarded for U.S. federal tax purposes.	Limited liability company and enter the appropriate tax classification. (P= Partnership; C= C corporation; or S= S corporation)
• Partnership	Partnership
• Trust/estate	Trust/estate

Line 4, Exemptions

If you are exempt from backup withholding and/or FATCA reporting, enter in the appropriate space on 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 ¹	Generally, exempt payees 1 through 5 ²
Payments made in settlement of payment card or third party network transactions	Exempt payees 1 through 4

¹ See Form 1099-MISC, Miscellaneous Income, and its instructions.

² 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. If this address differs from the one the requester already has on file, write NEW at the top. If a new address is provided, there is still a chance the old address will be used until the payor changes your address in their records.

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.

If you are a single-member LLC that is disregarded as an entity separate from its owner, 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 *What Name and Number To Give the Requester*, later, 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. 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 and clicking on Employer Identification Number (EIN) under Starting a Business. Go to www.irs.gov/Forms to view, download, or print Form W-7 and/or Form SS-4. Or, you can go to www.irs.gov/OrderForms to place an order and have Form W-7 and/or SS-4 mailed to you within 10 business days.

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 item 1, 4, or 5 below indicates 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), ABLE accounts (under section 529A), 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) other than an account maintained by an FFI	The actual owner of the account or, if combined funds, the first individual on the account ¹
3. Two or more U.S. persons (joint account maintained by an FFI)	Each holder of the account
4. Custodial account of a minor (Uniform Gift to Minors Act)	The minor ²
5. a. The usual revocable savings trust (grantor is also trustee)	The grantor-trustee ¹
b. So-called trust account that is not a legal or valid trust under state law	The actual owner ¹
6. Sole proprietorship or disregarded entity owned by an individual	The owner ³
7. Grantor trust filing under Optional Form 1099 Filing Method 1 (see Regulations section 1.671-4(b)(2)(i)(A))	The grantor ⁴
For this type of account:	Give name and EIN of:
8. Disregarded entity not owned by an individual	The owner
9. A valid trust, estate, or pension trust	Legal entity ⁴
10. Corporation or LLC electing corporate status on Form 8832 or Form 2553	The corporation
11. Association, club, religious, charitable, educational, or other tax-exempt organization	The organization
12. Partnership or multi-member LLC	The partnership
13. A broker or registered nominee	The broker or nominee

For this type of account:	Give name and EIN of:
14. 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
15. 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

¹ 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.

² Circle the minor's name and furnish the minor's SSN.

³ 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.

⁴ 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*, earlier.

***Note:** The 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 Pub. 5027, Identity Theft Information for Taxpayers.

Victims of identity theft who are experiencing economic harm or a systemic 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. 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 or report them at www.ftc.gov/complaint. You can contact the FTC at www.ftc.gov/idtheft or 877-IDTHEFT (877-438-4338). If you have been the victim of identity theft, see www.IdentityTheft.gov and Pub. 5027.

Visit www.irs.gov/IdentityTheft 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.

TAXABLE YEAR

CALIFORNIA FORM

2021 Withholding Exemption Certificate

590

The payee completes this form and submits it to the withholding agent. The withholding agent keeps this form with their records.

Withholding Agent Information

Name

Payee Information

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 box.

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.

To learn about your privacy rights, how we may use your information, and the consequences for not providing the requested information, go to ftb.ca.gov/forms and search for 1131. To request this notice by mail, call 800.852.5711.

Under penalties of perjury, I declare that I have examined the information on this form, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. I further declare under penalties of perjury that if the facts upon which this form are based change, I will promptly notify the withholding agent.

Type or print payee's name and title

Telephone

Payee's signature

Date

2021 Instructions for Form 590

Withholding Exemption Certificate

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

General Information

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. For more information, See General Information B, Income Subject to Withholding.

Registered Domestic Partners (RDPs) – For purposes of California income tax, references to a spouse, husband, or wife also refer to a California 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 more information, go to 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 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, Real Estate Withholding Statement, to claim an exemption from the real estate withholding requirement.

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

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 (completed and signed) 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 exemption certificate, the withholding agent may accept a letter from the payee as a substitute explaining why they are 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 (TIN).

The certification does not need to be renewed annually. The certification on Form 590 remains valid until the payee's status changes. The withholding agent must retain a copy of the certification or substitute for at least five years after the last payment to which the certification applies. The agent must provide it to the FTB upon request.

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 nonwage 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 see General Information E, Military Spouse Residency Relief Act (MSRRA), and 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 it has qualified through the CA SOS to transact intrastate business. 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 TIN and check the appropriate TIN box.

You must provide a valid 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 – Follow the country's practice for entering the city, county, province, state, country, and postal code, as applicable, in the appropriate boxes. Do not abbreviate the country name.

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

Withholding Agent Instructions

Do not send this form to the FTB. The certification on Form 590 remains valid until the payee's status changes. The withholding agent must retain a copy of the certificate or substitute for at least five years after the last payment to which the certificate applies. The agent must provide it to the FTB upon request.

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, [Form 592-PTE](#), Pass-Through Entity Annual Withholding Return, Form 592-Q, Payment Voucher for Pass-Through Entity Withholding, and Form 592-V, Payment Voucher for Resident or Nonresident Withholding.

Additional Information

Website: For more information, go to ftb.ca.gov and search for nonwage.

MyFTB offers secure online tax account information and services. For more information, go to ftb.ca.gov and login or register for **MyFTB**.

Telephone: 888.792.4900 or 916.845.4900, Withholding Services and Compliance phone service

Fax: 916.845.9512

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

For questions unrelated to withholding, or to download, view, and print California tax forms and publications, or to access the TTY/TDD numbers, see the Internet and Telephone Assistance section.

Internet and Telephone Assistance

Website: 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 disability
711 or 800.735.2929 California relay service

Asistencia Por Internet y Teléfono

Sitio web: 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.
711 ó 800.735.2929 servicio de relevo de California

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.



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). Where a proposed rule or proposed amended rule impacts three or fewer facilities, those facilities will be treated in much the same manner as contracting parties and so must also complete this form, disclosing information relating to any campaign contributions made to any SCAQMD Board Members. *See* Quadri Advice Letter (2002) A-02.096.1 In the event that a qualifying campaign contribution is made, the Board Member to whom it was made may be disqualified from participating in the actions involving that donor.

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). 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 _____

¹ The information provided on this form does not, and is not intended to, constitute legal advice. To the extent that you may have questions regarding any case law, citations, or legal interpretations provided above please seek the guidance of your own independent counsel.

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.

ATTACHMENT C

REQUEST FOR PROPOSAL (RFP) FOR CLEAN TECHNOLOGY TRUCK LOANER PROGRAM

P2024-01- ATTACHMENT C: PROJECT SPECIFICATIONS AND PRICING

September 1, 2023

SECTION A: SERVICE SPECIFICATIONS

Provide a detailed overview of all proposed services for each rental package. A package must include end-to-end rental service for zero-emission medium- and heavy-duty trucks, at a minimum. Use additional sheets if information does not fit.

SECTION B: PRICING

Rental Costs (Costs quoted on a per truck per day basis)

Medium- and Heavy-Duty Trucks

Truck Rental Cost	Specify rate(s) for the rental of each ZE truck, not including other fees and taxes.
Taxes	List all applicable taxes.
Fees	List all applicable fees.
Insurance	Describe insurance coverage and liability costs.
Maintenance	Describe services covered under maintenance (e.g., replacing tires and breaks, changing batteries, etc.)
Charging	Provide daily rates for charging a truck. These rates shall account for the estimated daily vehicle miles traveled for each truck classification and type in the proposal.
Roadside Assistance	State all services provided.
Training	Describe training provided to eligible applicants. At a minimum, training must include information on vehicle safety, operation, charging, roadside assistance, and other features.
Outreach	Describe outreach efforts to inform the above AB 617 Communities about the AB 617 Clean Technology Truck Loaner Program. Also, describe materials and other information distributed to program participants about local, state, and federal incentives opportunities for clean trucks (e.g., digital flyers, brochures, and other resources).
Other (specify)	List all other items not covered above and include their costs/fees as applicable.
Administrative Costs	
Personnel	List all personnel costs, including: <ul style="list-style-type: none"> Hourly labor rate by position, Expected travel expenses, and Others
Implementation	List all costs associated with project implementation, including: <ul style="list-style-type: none"> Application Evaluation Recordkeeping, Reporting, Processing Fees, Customer Service Costs, Material Fees, and Others.
Other (specify)	List all other items not covered above and include their costs/fees as applicable.

SECTION C: AVAILABILITY				
	ELABHWC	SBM	SELA	WCWLB
Number of Dealership Locations Within Each Community				
List All Available OEMS				
Provide Number of Available Trucks Per Community				
List All Available Truck GVWR Ranges				
List All Available Truck Vocations				
Provide Number of Charging Ports Per Community				

Community Boundaries:

[ELABHWC](#) = East Los Angeles, Boyle Heights, West Commerce, [SBM](#) = San Bernardino and Muscoy, [SELA](#) = Southeast Los Angeles, [WCWLB](#) = Wilmington, Carson, West Long Beach.

[↑ Back to Agenda](#)

BOARD MEETING DATE: September 1, 2023

AGENDA NO. 6

PROPOSAL: Approve Additional Funding for Residential Electric Vehicle Charging Incentive Program

SYNOPSIS: Since 2015, the Residential EV Charging Incentive Program provides rebates to offset the cost of residential Level 2 (240V) EV chargers. Currently, the program provides up to a \$250 rebate, plus an additional \$250 for low-income residents within the South Coast AQMD four-county jurisdiction. Staff is proposing to revise this program to focus solely on low-income residents while still providing the same \$500 rebate on a first come, first serve basis. This action is to request funding of up to \$200,000 from the Clean Fuels Program Fund (31) to continue the year-round Residential EV Charging Incentive Program.

COMMITTEE: Technology, August 18, 2023; Recommended for Approval

RECOMMENDED ACTION:

Approve funding of up to \$200,000 from the Clean Fuels Program Fund (31) to continue the Residential EV Charging Incentive Program.

Wayne Nastri
Executive Officer

AK:WS

Background

In September 2015, the Residential EV Charging Incentive Program was launched in part of the Governor's ZEV Action Plan, which 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. Since its inception, the program has served residents within the South Coast AQMD four-county jurisdiction by providing incentive rebates to offset the hardware cost of Level 2 EV chargers. The Residential EV Charging Incentive Program is a first-come, first-served program offering rebates up to \$250 for the cost of hardware,

with an additional incentive of \$250, for a total of \$500, available for low-income residents. To date over 3,200 rebates have been provided under the program.

Proposal

This action is to approve the use of a total amount not to exceed \$200,000 from the Clean Fuels Program Fund (31) to continue the year-round Residential EV Charging Incentive Program for low-income residents only. The rebates will cover up to \$500 for the cost of hardware for Level 2 EV chargers. Participants will be required to complete and submit an application for the rebate along with documentation verifying low-income eligibility (e.g., utility bill showing low-income utility rate from California Alternate Rates for Energy or Family Electric Rate Assistance Program, or a current CalWorks or Temporary Assistance for Needy Families membership card). The EV charger installations will need to be hard-wired to ensure the most efficient and safest operational approach and participants must meet a three-year commitment to use the EV hardware funded under the program. This rebate program will continue until funds are expended or until staff returns to the Board to seek approval for additional funding in the future.

Benefits to South Coast AQMD

The Residential EV Charging Incentive Program will continue to 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 and will assist to reduce NOx emissions, which are needed for the attainment of federal ozone standards. Also, the refocus of the program towards low-income areas is consistent with the Chair's priority.

Resource Impacts

Total funding for this Program shall not exceed \$200,000 from the Clean Fuels Fund (31). 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 1, 2023

AGENDA NO. 7

PROPOSAL: Recognize Revenue, Appropriate Funds, Issue Solicitations and Purchase Orders for Air Monitoring Equipment

SYNOPSIS: South Coast AQMD is expected to receive a Federal grant award up to \$655,042 from U.S. EPA under the Inflation Reduction Act. These actions are to: 1) recognize revenue and appropriate these funds into the Monitoring and Analysis and Compliance and Enforcement Divisions' FY 2023-24 and/or 2024-25 Budgets; and 2) issue solicitations and purchase orders for air monitoring equipment.

COMMITTEE: Administrative, August 11, 2023; Recommended for Approval

RECOMMENDED ACTIONS:

1. Recognize revenue up to \$655,042 upon receipt from U.S. EPA and appropriate the funds into the Monitoring and Analysis and Compliance and Enforcement Divisions' FY 2023-24 and/or 2024-25 Budgets as detailed in the Attachment; and
2. Authorize the Procurement Manager, in accordance with South Coast AQMD's Procurement Policy and Procedure, to issue "Prior Bid, Last Price" or Sole Source Purchase orders, or issue solicitations(s) as needed and based on results of the solicitation process issue purchase orders for items listed in Table 1.

Wayne Natri
Executive Officer

JCL:AP:RMB:ld:ev

Background

Inflation Reduction Act (IRA)

On August 16, 2022, Congress passed the Inflation Reduction Act (IRA), providing support for U.S. EPA to fund state and local government air pollution control agency air monitoring network upgrades through a noncompetitive grant process. This funding supports activities under the Clean Air Act Section 103 activities. The Clean Air Act was designed by Congress to protect public health and welfare from different types of air pollution caused by a diverse array of pollution sources. U.S. EPA has notified staff that South Coast AQMD will receive grant funding under the IRA of up to \$655,042.

Proposal

Inflation Reduction Act (FY 2023-24 and/or 2024-25)

This action is to recognize revenue upon receipt and appropriate up to \$655,042 from the U.S. EPA into the Monitoring and Analysis (47) and Compliance and Enforcement (60) Divisions' FY 2023-24 and/or FY 2024-25 Budgets according to Table 1.

Proposed Purchases through "Prior Bid, Last Price" or Solicitation Process

Monitor Shelters

The U.S. EPA IRA grant is expected to include funding for the purchase of up to two air monitoring shelters. U.S. EPA requires criteria pollutant measurements be made in a temperature-controlled environment to support compliance with Ambient Air Quality Standards (NAAQS) and emissions strategy development. Air monitoring shelters are needed for the relocated Azusa and Indio air monitoring sites. Decommissioned shelters date back to the 1970s and were originally the property of CARB. The decommissioned trailers leak and because of their age cannot maintain U.S. EPA Quality Control (QC) temperature control requirements. Replacement is critical to meeting the data completeness requirement and providing air quality data to the public. The estimated cost for up to two monitor shelters is \$290,042 (see Table 1). The purchase will be made by "Prior Bid, Last Price" or through a solicitation process, as needed, followed by issuance of a purchase order.

Gas Diluters with Photometer

The U.S. EPA IRA grant is expected to include funding for the purchase of up to four gas diluters with photometers. South Coast AQMD operates 27 ozone and nitrogen dioxide sites in support of the criteria pollutant monitoring network. Periodic Quality Assurance (QA) audits of gas monitors are required to meet U.S. EPA quality assurance criteria. Gas diluters are necessary to provide a known concentration of a gas standard required for the QA audit of air monitoring equipment. The current gas diluters are greater than ten years old and no longer meet U.S. EPA QC requirements. The replacement gas diluters meet U.S. EPA requirements as outlined in the most recent ozone Technical Assistance Document. The approximate cost for up to four gas diluters is \$105,000 (see Table 1). The purchase will be made by "Prior Bid, Last Price" or through a solicitation process, as needed, followed by issuance of a purchase order.

Proposed Purchases through Sole Source Purchase Order

Teledyne FLIR Cameras

The U.S. EPA IRA grant is expected to include funding for the purchase of up to two Teledyne FLIR cameras. The FLIR camera is a special tool routinely used in the field by staff to identify VOC leaks at oil refineries, oil field production operations for Rule 1142 (marine vessels), Rule 1173 (leaking components), Rule 1176 (drain system components), Rule 1178 (storage tanks at petroleum facilities) and Rule 463 (storage tanks). Further these units are used within historically underrepresented communities. The total cost for up to two cameras will not exceed \$260,000 (see Table 1).

Sole Source Justification

Sole Source Justification Section VIII.B.3 of South Coast AQMD’s Procurement Policy and Procedure identifies four major provisions under which a sole source award funded in whole or in part with federal funds, may be justified. Specifically, this request for sole source award is made under provision VIII.B.3.a.: the item is available only from a single source. The Teledyne FLIR camera is the only model available certified for use in hazardous locations which will allow South Coast AQMD staff to work safely in hazardous areas.

Resource Impacts

U.S. EPA IRA grant funding will support the purchase of equipment to meet the objectives of the program.

Table 1
FY 2023-24 and/or FY 2024-25 IRA Capital Outlays Major Object

Description	Unit	Qty	Estimated Amount	Contracting Method
Air Monitoring Shelters	Monitoring and Analysis Division	Up to 2	\$290,042	“Prior Bid, Last Price” or Solicitation Process
Gas Diluters with Photometer	Monitoring and Analysis Division	Up to 4	\$105,000	“Prior Bid, Last Price” or Solicitation Process
FLIR Cameras	Compliance and Enforcement Division	Up to 2	\$260,000	Sole Source
Total			\$655,042	

Attachment

Proposed IRA Expenditures for FY 2023-24 and/or FY 2024-25

Attachment
Proposed IRA Expenditures for FY 2023-24 and/or FY 2024-25

Account Description	Org Unit	Account Number	Program Code	Estimated Expenditure
Capital Outlay Major Object:				
Air Monitoring Shelters (Up to 2)	Monitoring and Analysis	77000	47242	\$290,042
Gas Diluters with Photometer (Up to 4)	Monitoring and Analysis	77000	47242	\$105,000
Teledyne FLIR Camera (Up to 2)	Compliance and Enforcement	77000	60242	\$260,000
Total Capital Outlay Major Object:				\$655,042

BOARD MEETING DATE: September 1, 2023

AGENDA NO. 8

PROPOSAL: Transfer and Appropriate Funds for Air Monitoring Programs and Issue Purchase Order(s) for Two Vehicles

SYNOPSIS: South Coast AQMD previously received Federal grant awards from the Federal Government and U.S. EPA to continue implementing the Enhanced Particulate Monitoring and PAMS Programs, including funds for the purchase of new vehicles. However, additional funds are needed for the purchase of new zero-emission vehicles. These actions are to transfer funds up to \$91,766 from the Clean Fuels Program Fund to the Monitoring and Analysis Division FY 2023-24 Budget and authorize the Procurement Manager to issue solicitations and purchase order(s) for two zero-emission vehicles.

COMMITTEE: Technology, August 18, 2023; Recommended for Approval

RECOMMENDED ACTIONS:

1. Transfer and appropriate funds up to \$91,766 from the Clean Fuels Program Fund (31) to the Monitoring and Analysis Division FY 2023-24 Budget Capital Outlays Major Object; and
2. Authorize the Procurement Manager, in accordance with South Coast AQMD's Procurement Policy and Procedure, to issue purchase order(s), based on a solicitation process, "Prior Bid, Last Price" or cooperative agreement for two zero-emission vehicles as listed in Table 1.

Wayne Natri
Executive Officer

JCL:AK:AP:MW:RMB:ld:ev

Background

Enhanced Particulate Monitoring Program

South Coast AQMD has been providing enhanced particulate monitoring support as part of a national monitoring program since 2003. Sample collection began in February 2003 and will continue for the foreseeable future. South Coast AQMD was awarded

\$2,238,000 from the Federal Government for the annually funded Enhanced Particulate Monitoring Program. Of that amount, \$45,000 was previously approved by the Board on June 2, 2023 (Agenda No. 3) for the purchase of a low-emission vehicle if additional funds could not be secured to purchase a zero-emission vehicle.

Photochemical Assessment Monitoring Stations (PAMS) Program

In February 1993, U.S. EPA promulgated the PAMS regulations for areas classified as serious, severe, or extreme nonattainment. These regulations require that South Coast AQMD conduct monitoring for ozone precursors with enhanced monitoring equipment at multiple sites. The PAMS Program also funds upper air and surface-based meteorological measurements at several locations. Since the onset of the PAMS Program, U.S. EPA has annually allocated Section 105 Grant funds in support of this requirement. South Coast AQMD was awarded funding from U.S. EPA for ongoing operation of the PAMS Monitoring Program through September 30, 2023, in an amount of \$783,141. Of that amount, \$40,000 was previously approved by the Board in December 2022 for the purchase of a low-emission vehicle if additional funds could not be secured to purchase a zero-emission vehicle.

Proposal

Transfer and Appropriate Funds for Zero-Emission Vehicles

This action is to transfer and appropriate funds of up to \$91,766 from the Clean Fuels Program Fund (31) to the Monitoring and Analysis Division FY 2023-24 Budget Capital Outlays Major Object to secure the additional funding to complete the purchase of two zero-emission vehicles for the Enhanced Particulate Monitoring Program and the PAMS Program.

Proposed Purchases through a Solicitation Process, “Prior Bid, Last Price” or Cooperative Agreement

Vehicles currently assigned to technicians to support the Enhanced Particulate Monitoring Program and PAMS monitoring networks have been driven over 150,000 miles or are inoperable. Instruments require regular site visits for maintenance, loading filter media, and QC diagnostic tests. Staff proposes to purchase two zero-emission vehicles. The vehicles will be selected through a solicitation process, “Prior Bid, Last Price” or Cooperative Purchasing Agreement. Zero-emission vehicles are available from vendors through cooperative purchasing under the State of California, Department of General Services, Procurement Division, and Alternative Fueled Vehicles Contract 1-22-23-23A through I. These advanced technology vehicles will be assigned to field maintenance technicians and will be used for the air monitoring network while supporting the agency’s commitment to use of zero-emission technologies, where feasible.

Resource Impacts

There are sufficient funds available in the Clean Fuels Program Fund (31), and the Federal Government grants for the purchase of these two vehicles.

Table 1
Proposed Purchase through a Solicitation Process, “Prior Bid, Last Price” or Cooperative Agreement Purchase Order(s)

Description	Qty	Estimated Amount	Contracting Method
Zero-Emission Vehicle	2	\$176,766	Solicitation, “Prior Bid, Last Price” or Cooperative Agreement
Total		\$176,766¹	

¹ \$40,000 for this purchase was previously approved and funded through the PAMS Monitoring Program in the December 2, 2022, Agenda No. 7 Board Letter, and \$45,000 was previously approved and funded through the Enhanced Particulate Monitoring Program in the June 2, 2023, Agenda No. 3 Board Letter.

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BOARD MEETING DATE: September 1, 2023

AGENDA NO. 9

PROPOSAL: Appropriate Funds, Issue Solicitations and Purchase Orders for Air Monitoring and Laboratory Equipment

SYNOPSIS: South Coast AQMD FY 2023-24 Annual Budget approved the purchase of air monitoring and laboratory equipment. This action is to appropriate additional funds, issue solicitations and purchase orders for air monitoring and laboratory equipment for supporting AB 617 community air monitoring and ethylene oxide measurement efforts.

COMMITTEE: Administrative, August 11, 2023; Recommended for Approval

RECOMMENDED ACTIONS:

1. Appropriate up to \$350,000 from the Undesignated (Unassigned) Fund Balance to the General Fund, FY 2023-24 Monitoring and Analysis Budget, Capital Outlays Major Object; and
2. Authorize the Procurement Manager, in accordance with South Coast AQMD's Procurement Policy and Procedure, to issue "Prior Bid, Last Price" purchase orders, sole-source purchase orders, or solicitation(s) as needed, and based on the results, issue purchase orders for the equipment listed in Table 1.

Wayne Nastri
Executive Officer

JCL:AP:SD:PP:cd:ld

Background

In May 2023, the Board approved the Executive Officer's Proposed Goals and Priority Objectives and Proposed Budget for FY 2023-24. The adopted budget includes capital outlay funds in the amount of \$320,000 for the replacement of air monitoring and laboratory equipment to support the AB 617 program.

South Coast AQMD began investigating facilities that emit Ethylene Oxide (EtO) in March 2022, following U.S. EPA's reconsideration of the potential toxicity of EtO. In

recent years, continuous instruments have been developed to measure EtO in real- or near-time, at low time resolution (e.g., one minute to an hour) and with low detection limits (e.g., below one part per billion; ppb). These instruments can be used to identify EtO hotspots, characterize the process(es) that might lead to fugitive emissions of EtO from sterilization and other industrial facilities, and assess the potential impact of these emissions in our communities, including AB 617 and other environmental justice communities. Continuous EtO instruments will be effective supplemental tools to the traditional method of collecting integrated canister samples for a period of 24-hours followed by laboratory analysis using U.S. EPA TO-15 method. Funding in the amount of \$350,000 is needed to procure two continuous EtO instruments for fixed and mobile monitoring applications.

Proposal

Proposed Purchases through “Prior Bid, Last Price” or Solicitation Process

Continuous Gaseous Monitors

The FY 2023-24 budget includes funding for the purchase of up to four continuous gaseous monitors. Continuous monitors for measuring NOx, hydrogen sulfide or gaseous pollutants are needed to satisfy the operational needs of the AB 617 program. The units would be used for baseline measurements in the South Los Angeles community. Replacement of gaseous monitors that have reached the end of their useful life is critical to meeting the data completeness requirement and providing air quality data to the public. The estimated cost for up to four continuous gaseous monitors is \$80,000, as approved in the FY 2023-24 Adopted Budget (see Table 1). The purchase will be made by “Prior Bid, Last Price” or through a solicitation process, as needed, followed by issuance of a purchase order.

Continuous Particulate Monitors

The FY 2023-24 budget includes funding for the purchase of up to four continuous particulate monitors for PM2.5, PM10, or ultrafine particle measurements to support AB 617 monitoring efforts. Up to two units would be used for baseline measurements in the South Los Angeles community, and up to two units would be used to support sensor deployment in the San Bernardino Muscoy community, and to replace the continuous particle monitors used on mobile platforms to conduct air monitoring surveys. The approximate cost for up to four continuous particulate monitors is \$120,000, as approved in the FY 2023-24 Adopted Budget (see Table 1). The purchase will be made by “Prior Bid, Last Price” or through a solicitation process, as needed, followed by issuance of a purchase order.

Proposed Purchases through Sole-Source Purchase Order

Gas Pre-Concentrator

The FY 2023-24 budget includes funding for the purchase of a gas pre-concentrator. There is a need for continued ambient air hydrocarbon speciation analysis in AB 617 communities. This analysis is commonly used for AB 617 community odor complaints,

oil well monitoring near communities, and source apportionment. The current pre-concentrator is more than 15 years old, replacement parts are no longer available, and the software is no longer supported. The approximate cost for a gas pre-concentrator is \$90,000, as approved in the FY 2023-24 Adopted Budget (see Table 1). The purchase will be made through issuance of a sole-source purchase order with Entech Instruments, Inc.

Ethylene Oxide Analyzer (Picarro, Inc., Model G2920)

Picarro, Inc. has developed a continuous monitor based on cavity ring-down spectroscopy (CRDS) for direct measurements of EtO in real- and near-real time. Because of its relatively small size and versatility, sub-part per billion detection limit, and proven field performance in the Basin with minimal data loss, this instrument is appropriate for stationary and mobile measurements of EtO. The G2920 would be used as a continuous emissions monitoring systems (CEMS) to evaluate the ability of CRDS to measure stack emissions. This unit would also be used for fixed air monitoring applications near sterilization and other industrial facilities and, overall, to better understand the capabilities and limitations of CRDS technology. The approximate cost for one G2920 Monitor and associated equipment is \$150,000. The purchase will be made through issuance of a sole-source purchase order with Picarro, Inc.

Continuous Monitor for Ethylene Oxide (Aerodyne Research, Inc., Model TILDAS-FD-SC-L1)

Aerodyne Research, Inc. developed a continuous monitor based on Tunable Infrared Laser Direct Absorption Spectroscopy (TILDAS) for direct measurements of EtO in real- and near-real time. When operated under ideal conditions, this instrument can achieve a detection limit for EtO close to typical background levels measured in the Basin using canister sampling followed by laboratory analysis (method TO-15). This instrument has high sensitivity, has demonstrated field performance in the Basin with minimal data loss, and can be integrated easily with one of South Coast AQMD's mobile platforms for air toxic measurements (also developed by Aerodyne Research, Inc). The TILDAS-FD-SC-L1 would be used as a CEMS to evaluate the ability of TILDAS to measure stack emissions. This unit would be used for fence-line and other mobile monitoring surveys near sterilization and other industrial facilities, for community-based measurements, for better assessment of regional background levels of EtO and, overall, for understanding the capabilities, and limitations of the TILDAS technology. The approximate cost for one TILDAS-FD-SC-L1 and associated equipment is \$200,000. The purchase will be made through issuance of a sole-source purchase order with Aerodyne Research, Inc.

Sole-Source Justification

Section VIII.B.2 of South Coast AQMD's Procurement Policy and Procedure identifies four major provisions under which a sole-source award may be justified. The request for sole-source purchase from Entech Instruments, Inc., is made under Section

VIII.B.2.c(3): The project involves the use of proprietary technology. The pre-concentrator sold by Entech Instruments, Inc., is the only pre-concentrator compatible with the laboratory’s current GC-MS methodology and configuration.

The request for sole-source purchase from Picarro, Inc. and Aerodyne Research, Inc. is made under Section VIII.B.2.c(1): The unique experience and capabilities of the contractor or contractor team. The Picarro instrument provides a combination of portability and demonstrated real-world detection limits in the sub-ppb range, small form factor, CEMS capability, and ability to continuously collect data without downtime. These features are unique amongst CRDS-based EtO instrumentation. The G2920 model is exclusively sold through Picarro, Inc.

The Aerodyne instrument is the only portable continuous monitor with a demonstrated capability of detecting concentrations of EtO near regional background levels on a continuous basis and potential CEMS capability, with minimal instrument downtime. This EtO monitoring instrument is exclusively sold through Aerodyne Research, Inc.

Resource Impacts

Funding to purchase the continuous gaseous monitors, continuous particulate monitors, and gas pre-concentrator outlined in this Board letter is available in the FY 2023-24 Adopted Budget. Funding to purchase the two continuous ethylene oxide monitors is available upon approval of the appropriation from the General Fund Undesignated (Unassigned) Fund Balance in this Board letter.

**Table 1
FY 2023-24 Capital Outlays Major Object**

Description	Qty	Estimated Amount	Contracting Method
Continuous Gaseous Monitors	Up to 4	\$80,000	“Prior Bid, Last Price” or Solicitation Process
Continuous Particulate Monitors	Up to 4	\$120,000	“Prior Bid, Last Price” or Solicitation Process
Gas Pre-Concentrator	1	\$90,000	Sole Source
Ethylene Oxide Analyzer (Picarro, Inc., Model G2920)	1	\$150,000	Sole Source
Continuous Monitor for Ethylene Oxide (Aerodyne Research, Inc., Model TILDAS-FD-SC-L1)	1	\$200,000	Sole Source
Total		\$640,000	

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BOARD MEETING DATE: September 1, 2023

AGENDA NO. 10

PROPOSAL: Transfer and Appropriate Funds for Independent Audit of Rule 1180 Fenceline Air Monitoring Network

SYNOPSIS: Rule 1180 mandates the implementation of real-time observations of air quality at or near the fenceline of all major refineries in the Basin, and in nearby communities. In June 2018, the Board created the Rule 1180 Special Revenue Fund (78) to establish community air monitoring near refineries. FY 2023-24 Budget for this program is approximately \$4.6 million in annual fees from refineries for community air monitoring. These actions are to transfer and appropriate \$700,000 from the Rule 1180 Special Revenue Fund (78), and appropriate \$500,000 from the General Fund Undesignated (Unassigned) Fund Balance to Monitoring and Analysis' FY 2023-24 Budget for an independent audit of the Rule 1180 fenceline air monitoring network.

COMMITTEE: Administrative, August 11, 2023; Recommended for Approval

RECOMMENDED ACTIONS:

1. Transfer and appropriate \$700,000 from the Rule 1180 Special Revenue Fund (78) to Monitoring and Analysis' (MAD) FY 2023-24 Budget (Org 42), Services & Supplies Major Object, as indicated in Table 1; and
2. Appropriate \$500,000 from the General Fund Undesignated (Unassigned) Fund Balance for Rule 1180 monitoring operations to MAD's FY 2023-24 Budget (Org 42), Services & Supplies Major Object, as indicated in Table 1.

Wayne Natri
Executive Officer

Background

Rule 1180 - Refinery Fenceline and Community Air Monitoring, was adopted by the Board in December 2017 and requires the seven major refineries in the Basin to measure levels of various air pollutants at their fenceline. This Rule also established a fee schedule to fund community air monitoring stations developed and operated by the South Coast AQMD to provide air quality information to the public about the potential impact of refinery emissions in their communities. In FYs 2017-18 and 2018-19, the Board recognized revenue in two installments of \$2,145,390 and \$5,005,907, respectively, into the Rule 1180 Special Revenue Fund (78) for the installation of community air monitoring stations near refineries. Beginning January 2020, pursuant to Rule 301 - Permitting and Associated Fees, the refineries also started funding annual operating and maintenance costs totaling approximately \$4.6 million in FY 2023-24 for a refinery-related community air monitoring program near the following facilities:

- Tesoro Refining & Marketing Company, LLC, Carson;
- Tesoro Refining & Marketing Company, LLC, Wilmington;
- PBF Energy, Torrance Refining Company, Torrance;
- Chevron Products Company, Chevron El Segundo Refinery, El Segundo;
- Phillips 66 Company, Carson;
- Phillips 66 Company, Wilmington; and
- Valero Energy Corporation, Valero Wilmington Refinery, Wilmington.

Annual operating and maintenance fees pursuant to Rule 301 have been accounted for in the FY 2023-24 Budget.

The Rule 1180 fenceline air monitoring network consists of Optical Remote Sensing (ORS) and traditional analyzers deployed at the fencelines of all seven major refineries in the Basin. South Coast AQMD staff has been working with each facility to assure appropriate instrumentation, standardization of data acquisition and reporting, and appropriate procedure implementation to produce high-quality data. There is a pressing need to have a qualified independent contractor conduct a systematic review of the entire Rule 1180 fenceline air monitoring network and ensure that the collected refinery data meets the stringent quality assurance criteria of this program. In May 2022, South Coast AQMD issued RFP# P2022-13 to identify one or more contractors capable of designing and conducting an independent audit of the fenceline air monitoring systems of all refineries that are part of the South Coast AQMD Rule 1180 program.

In June 2022, the Board authorized a transfer up to \$700,000 from the Rule 1180 Special Revenue Fund (78) and up to \$500,000 from the General Fund Undesignated (Unassigned) Fund balance to MAD's FY 2022-23 Budget (org 42) for independent audit activities for the Rule 1180 program.

In April 2023, based on the results by an expert panel review of all proposals submitted in response to RFP# P2022-23, the Board authorized the Executive Officer to execute a contract with National Physical Laboratory (NPL) in an amount up to \$1,200,000 to conduct an independent audit of the fenceline air monitoring systems for all refineries that are part of the Rule 1180 fenceline air monitoring network.

Contract negotiations with NPL extended past the end of FY 2022-23; and therefore, the Board's authorization for the transfer of funds and appropriations has lapsed.

Proposal

This action is to transfer and appropriate \$700,000 from the Rule 1180 Special Revenue Fund (78) into MAD's FY 2023-24 Budget (Org 42) Services and Supplies Major Object, as indicated in Table 1.

This action is also to appropriate \$500,000 from the General Fund Undesignated (Unassigned) Fund Balance to MAD's FY 2023-24 Budget (Org 42), Services & Supplies Major Object, as indicated in Table 1.

These funds will be used to execute a contract with NPL to conduct an independent audit of fenceline air monitoring systems for all refineries that are part of the Rule 1180 fenceline air monitoring network.

Benefits to South Coast AQMD

Funding for the implementation of Rule 1180 will allow the South Coast AQMD to fulfill the requirements of Rule 1180, which will result in benefits to environmental justice communities and others working and residing in the Basin near refineries.

Resource Impacts

Sufficient funding is available in the Rule 1180 Special Revenue Fund and Undesignated (Unassigned) Fund Balance from Rule 1180 prior year budget savings to support the contract identified in this Board letter.

Attachment

Table 1: FY 2023-24 Proposed Services and Supplies Expenditures for Rule 1180.

Table 1
FY 2023-24 Proposed Services and Supplies Expenditures for Rule 1180*

Description	Account Number	Appropriation from FY 2020-21 Budget Savings**	Additional Appropriations from Fund 78**	Estimated Amount
Independent Audit of Rule 1180 Network#	67450	\$500,000	\$700,000	\$1,200,000

*These are in addition to the appropriations included in FY 2023-24 Budget funded from annual fees.

**Funds authorized by the Board in June 2022, Agenda Item #7, were not used in FY 2022-23.

#Expenditures may be appropriated in the Capital Outlays Major Object as warranted.

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BOARD MEETING DATE: September 1, 2023

AGENDA NO. 11

PROPOSAL: Appropriate Funds and Purchase Orders to Implement Air Quality Community Training in Eastern Coachella Valley

SYNOPSIS: U.S. EPA awarded South Coast AQMD a grant from the State Environmental Justice Cooperative Agreement Program to implement an Air Quality Academy to improve environmental literacy and air quality data in the Eastern Coachella Valley. Established in 2021, the Air Quality Academy provides training on the application and usage of air quality sensors, interpretation of the air quality index, and preventive actions to reduce air pollution exposure. U.S. EPA approved a one year no-cost extension of this grant to continue implementation until October 2024. This action is to appropriate the remaining balance of \$41,396 to the Diversity, Equity and Inclusion with Community Air Programs Office and \$6,258 to the Monitoring and Analysis Division FY 2023-24 and/or FY 2024-25 Budgets and to issue solicitations and purchase orders.

COMMITTEE: Administrative, August 11, 2023; Recommended for Approval

RECOMMENDED ACTIONS:

1. Appropriate up to \$41,396 in U.S. EPA State Environmental Justice Cooperative Agreement (SEJCA) funds into the Diversity, Equity and Inclusion with Community Air Programs Office and \$6,258 to the Monitoring and Analysis Division FY 2023-24 and/or FY 2024-25 budgets (as set forth in Attachment 1); and
2. Authorize the Procurement Manager, in accordance with South Coast AQMD Procurement Policy and Procedure, to issue solicitations and purchase orders to implement air quality data monitoring and community training in the Eastern Coachella Valley for items listed in Attachment 1.

Wayne Natri
Executive Officer

Background

In June 2021, U.S. EPA granted South Coast AQMD an award of \$200,000 from the State Environmental Justice Cooperative Agreement (SEJCA) Program funds to partner with local entities to develop an Air Quality Academy in the Eastern Coachella Valley (ECV). On October 1, 2021, the Board recognized \$200,000 and approved appropriations of \$113,091 to the Planning, Rule Development & Area Sources, Science & Technology Advancement, and Legislative, Public Affairs and Media Office into FY 2021-22 and/or FY 2022-23 Budgets from the U.S. EPA SEJCA Program.

Staff has been working with Desert Healthcare District & Foundation (DHCD&F), Alianza Coachella Valley (Alianza CV) (DHCD&F's Subcontractor), Health Assessment and Research for Communities (HARC), and local tribes to implement tasks outlined in the grant. To date, Alianza CV has recruited 15 ECV community members for the Air Quality Academy and have participated in the air quality training and workshops. HARC is in the process of analyzing community data (e.g., environmental, demographic) to complete a community Environmental Health Report. This project builds upon existing efforts to implement the Assembly Bill 617 (AB 617) ECV Community Emissions Reduction Plan (CERP).

The project was scheduled to end in October 2023. However, staff encountered challenges in involving Twenty-Nine Palms Band of Mission Indians, the original tribal partner, in the Air Quality Academy. Tribal participation is required, therefore staff is currently in discussions with Torres Martinez Desert Cahuilla Indians (Torres Martinez Tribe), to engage them in the Air Quality Academy. In June 2023, U.S. EPA approved a no-cost extension until October 2024 to allow time for South Coast AQMD and project partners to conduct outreach to the Torres Martinez Tribe, gather community input for the Environmental Health Report, analyze the sensor data, and use the remainder of the funds.

Proposal

This action is to appropriate up to \$41,396 in U.S. EPA State Environmental Justice Cooperative Agreement (SEJCA) funds into the Diversity, Equity and Inclusion with Community Air Programs Office and \$6,258 to the Monitoring and Analysis Division FY 2023-24 and/or FY 2024-25 budgets to procure related services and supplies as listed in Attachment 1 – Proposed Appropriations for FYs 2023-24 and/or 2024-25. Approval of these actions will allow staff to continue implementing the Air Quality Academy in ECV and publish a community Environmental Health Report in collaboration with DHCD&F, HARC, and the Torres Martinez Tribe.

Benefits to South Coast AQMD

This work complements the ongoing efforts to partner with the community to address local air quality priorities through the AB 617 program, including providing information to reduce air pollution exposure in ECV and expanding the air quality sensor network. This project will continue to strengthen South Coast AQMD's collaborative partnerships in ECV and improve air pollution data and data accessibility in these rural communities. Additionally, this project can serve as a model for future outreach and educational programs in this region.

Resource Impacts

The U.S. EPA SEJCA Program funding will continue to support the objectives of this grant. The funding will also support outreach efforts and the community Environmental Health Report. This project will also partially support ECV CERP efforts.

Attachment

Proposed Appropriations for FY 2023-24 and/or 2024-25

ATTACHMENT 1

Proposed Appropriations for FY 2023-24 and/or 2024-25

Description	Account Number	Org Unit	Estimated Expenditures
Services and Supplies Major Object			
SIM Card service	67900	Monitoring and Analysis Division	\$5,758
Miscellaneous outreach supplies	68100	Diversity, Equity, and Inclusion with Community Air Programs Office (DEI with CAP)	\$1,014
Travel	67800	DEI with CAP	\$7,060
Meeting logistics contracts	67450	DEI with CAP	\$24,400
Site rental fees for sensors contracts	67350	Monitoring and Analysis Division	\$500
Clerical support for translation and training services	67460	DEI with CAP	\$7,580
Conference fees	69500	DEI with CAP	\$1,342
Total Appropriation			\$47,654

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BOARD MEETING DATE: September 1, 2023

AGENDA NO. 12

PROPOSAL: Appropriate Funds from the Undesignated (Unassigned) Fund Balance for Permitting Enhancement Program

SYNOPSIS: In order to implement the Chair's Initiative related to the Permitting Enhancement Program, assistance from retirees is temporarily needed to continue on an as needed basis for a maximum amount of \$400,000. This action is to appropriate this amount from the General Fund Undesignated (Unassigned) Fund Balance into Engineering and Permitting's FY 2023-24 Budget.

COMMITTEE: Administrative, August 11, 2023; Recommended for Approval

RECOMMENDED ACTION:

Appropriate a total of \$400,000 from the General Fund Undesignated (Unassigned) Fund Balance to Engineering and Permitting's FY 2023-24 Budget, Services & Supplies Major Object for assistance from retirees to reduce the pending permit application inventory.

Wayne Nastri
Executive Officer

SN:JA:JW

Background

One of the Chair's Initiatives is the Permitting Enhancement Program, which includes efforts focused on reducing the permit application inventory. Due to recent staff turnover and retirements, the majority of staff in the Engineering and Permitting division have less than five years of experience in their current roles. Therefore, as staff are trained in their new positions, there is a temporary need to continue to use retirees to supplement staff's efforts in reducing the pending permit application inventory and meeting the division's Goals and Objectives.

Proposal

Nine retirees from Engineering and Permitting received approval from the San Bernardino County Employees' Retirement Association and have returned to assist in permit application processing and review. Additional retirees have expressed interest in returning to assist in these efforts. The maximum amount necessary for retirees to return to work to assist in efforts to reduce the permit application inventory for the next year is \$400,000. This strategy was initially implemented in October 2022 and was effective in supporting and maintaining production of permit applications. Since May 2023, the Engineering and Permitting division has promoted 13 supervisory staff and are currently conducting hiring interviews to fill approximately 26 Air Quality Engineer positions to address the vacancy rate. To continue to utilize retirees will support permit production during the transition, as promoted staff learn their roles and new engineers are trained over the next year.

Staff is requesting that \$400,000 be appropriated from the Undesignated Fund Balance to Engineering and Permitting's FY 2023-24 Budget, Services & Supplies Major Object.

Resource Impacts

Sufficient funding is available in the General Fund Undesignated (Unassigned) Fund Balance.

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BOARD MEETING DATE: September 1, 2023

AGENDA NO. 13

PROPOSAL: Execute Contracts for Legislative Representation in Sacramento, California

SYNOPSIS: In May 2023, the Board approved release of an RFP to solicit proposals for legislative representation in Sacramento, California. Four separate proposals were received from Actum, LLC, California Advisors, LLC, Joe A. Gonsalves & Son and The Monares Group. On August 11, 2023, the Legislative Committee recommended approval of the execution of contracts with California Advisors, LLC for \$143,836 and Joe A. Gonsalves & Son for \$143,836 for legislative representation in Sacramento, California.

COMMITTEE: Legislative, August 11, 2023; Recommended for Approval

RECOMMENDED ACTION:

Authorize the Chair to execute contracts with California Advisors, LLC for \$143,836 and Joe A. Gonsalves & Son for \$143,836 in an amount not to exceed \$287,672 for legislative representation in Sacramento, California for one year, beginning on January 1, 2024. The contracts include options for up to two one-year renewals, contingent on satisfactory performance and approval of subsequent budgets, upon approval by the Board.

Wayne Natri
Executive Officer

DA:LTO:PC:EH

Background

The current contracts for legislative representation in Sacramento, California expire on December 31, 2023. As a leading air quality agency in California and an innovative leader in developing emission reduction programs, South Coast AQMD is an important contributor to the policy discussions in Sacramento. It is vital to ensure that South

Coast AQMD's input continues to be conveyed in a timely and meaningful manner, and that South Coast AQMD is involved in the day-to-day policy discussions in Sacramento to promote cleaner air and to protect the agency's authority, both through policy development and securing adequate funding. A legislative presence in Sacramento is critical to advancing the Board policies and priorities, including the 2022 AQMP and subsequent AQMPs, state requirements such as implementation of AB 617, South Coast AQMD legislative guiding principles, as well as protecting South Coast AQMD's authority. Therefore, it is appropriate to continue direct representation in Sacramento, California.

Legislative presence in Sacramento includes providing technical information, assistance and acting as a liaison between South Coast AQMD and legislators and the Governor's Office regarding South Coast AQMD's policies and funding priorities; seeking funding and program support for technology advancement and emission reduction projects and incentive programs and environmental justice programs; and advocating for South Coast AQMD's positions on air quality-related legislation.

These efforts also include fostering state support for South Coast AQMD's state and federal initiatives which have synergy at the state level.

The 2022 AQMP puts a priority on maximizing emissions reductions utilizing zero emission technologies wherever cost-effective and feasible. Incentives are critically important to achieve near-term attainment requirements and serve to accelerate the transition to zero emission technologies. Should the region fail to meet federally mandated clean air requirements, U.S. EPA could impose sanctions that are onerous and costly to the Basin's residents and businesses.

The development of South Coast AQMD's 2024 legislative guiding principles and policy priorities will depend largely on the outcome of the 2023 legislative session. However, many of 2023's program elements and policy priorities are expected to continue, and it is anticipated that there will be a need to build upon them in the coming 2024 legislative year in Sacramento. South Coast AQMD's legislative priorities for 2024 will be presented to the Legislative Committee for review and approval, and then will move to the Board for final approval.

In May 2023, the Board approved release of an RFP to solicit proposals for legislative representation in Sacramento, California. Four separate proposals were received from Actum, LLC, California Advisors, LLC, Joe A. Gonsalves & Son and The Monares Group. On August 11, 2023, the Legislative Committee recommended approval of the execution of contracts with California Advisors, LLC for \$143,836 and Joe A. Gonsalves & Son for \$143,836, for a total amount not to exceed \$287,672 for legislative representation in Sacramento, California.

Outreach

In accordance with South Coast AQMD'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, Riverside County's Press Enterprise, and the Sacramento Bee newspapers, to leverage the most cost-effective method of outreach to the entire South Coast Basin and beyond.

Additionally, forty-one RFP notices were emailed to lobbying and public affairs firms in California. Notice of the RFP was e-mailed to the Black and Latino Legislative Caucuses, as well as various other legislative caucuses and to various minority chambers of commerce and business associations and placed on South Coast AQMD's website (<http://www.aqmd.gov>).

Bid Evaluation

Four proposals were received in response to the RFP. The proposals were evaluated by a three-member panel, including one South Coast AQMD executive, who was female and Asian-American; one South Coast AQMD manager, who was male and Latino; and one outside municipal official, who was female and Latina. All proposals were deemed technically qualified, and all proponents were interviewed by South Coast AQMD's Legislative Committee. Attachment A provides the final scores for the four firms.

Proposal

Staff proposes to execute contract(s) with California Advisors, LLC for \$143,836 and Joe A. Gonsalves & Son for \$143,836 in an amount not to exceed \$287,672 for legislative representation in Sacramento, California, for one-year, beginning on January 1, 2024. The contract(s) include options for up to two one-year renewals, contingent on satisfactory performance and approval of subsequent budgets, upon approval of the Board.

Resource Impacts

Funding for these contracts is available in the Legislative, Public Affairs & Media FY 2023-24 Budget. Funding for the two optional one-year extensions in both contracts is contingent upon the Board's approval of the Budget for the respective fiscal years.

Attachment

RFP #P2023-08 Scores and Cost Matrix for Qualifying Firm

ATTACHMENT A

**RFP #P2023-08 SCORES AND COSTS MATRIX
FOR QUALIFYING FIRMS**

Firm Name	Technical Score	Additional Points	Cost Points	Total Points	Total Cost
Actum, LLC	58.0	0	7.9	65.9	\$250,000
California Advisors, LLC	66.7	12	30.0	108.7	\$143,836
Joe A. Gonsalves & Son	66.0	0	25.0	91.0	\$168,000
The Monares Group	56.0	17.0	22.5	95.5	\$180,000

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BOARD MEETING DATE: September 1, 2023

AGENDA NO. 14

PROPOSAL: Approve Revisions to Class Specifications; Amend the Salary Resolution to Revise Salaries as Part of the Revision Process; Amend FY 2023-24 Budget By Adding and Deleting Positions to Address Operational Needs

SYNOPSIS: This item is to revise the Deputy Clerk, Deputy Clerk/Transcriber, and Senior Deputy Clerk class specifications based on a classification study of Clerk of the Boards Office positions. In addition, based upon an internal review of case settlement and investigation functions in the General Counsel's Office, staff recommends revisions to the Paralegal, Senior Paralegal, Investigator, and Supervising Investigator class specifications. This item would also increase the salaries for the updated Deputy Clerk/Transcriber and Senior Deputy Clerk positions, the Paralegal and Senior Paralegal positions, and the Supervising Air Quality Inspector position as a related matter. As part of this organizational review process, staff also recommends adding and deleting classifications in the General Counsel's Office to reflect the functions of the proposed revised class specifications.

COMMITTEE: Administrative, August 11, 2023; Recommended for Approval

RECOMMENDED ACTIONS:

1. Revise the class specifications for the Deputy Clerk, Deputy Clerk/Transcriber, and Senior Deputy Clerk positions in the Clerk of the Boards Office, as set forth in Attachment A;
2. Revise the class specifications for the Paralegal, Senior Paralegal, Investigator, and Supervising Investigator positions in the General Counsel's Office, as set forth in Attachment B;
3. Amend Section 53 of the Salary Resolution and Appendices A and B of the Memorandum of Understanding (MOU) between South Coast AQMD and Teamsters Local 911 for: revised Deputy Clerk/Transcriber, and Senior Deputy Clerk positions; the revised Paralegal and Senior Paralegal positions; and the Supervising AQ Inspector position, as set forth in Attachment C; and

4. Amend the FY 2023-24 Budget by adding a Contracts Assistant position and a Senior Paralegal position to the General Counsel's Office, and by deleting two (2) Investigator positions in the General Counsel's Office, as set forth in Attachment D.

Wayne Natri
Executive Officer

AJO:mm

Background

Article 45, Section 1 of the MOU for the Technical & Enforcement and Office, Clerical and Maintenance Units, provides a procedure for employees to request a classification study of their position and duties in order to determine whether their duties and position are properly classified. Through this procedure, the deputy clerk positions in the Clerk of the Boards (COB) Office were evaluated. The proposed revisions to COB class specifications and proposed salary adjustments have been discussed, and agreed upon, with union representatives of the bargaining unit.

Under the direction of the Executive Officer and the Chief Operating Officer, each division continually reviews and assesses staffing resources and functionality to determine whether changes should be made to increase efficiency and effectiveness of South Coast AQMD programs. Class specifications in the General Counsel's Office were evaluated to determine whether their duties and positions were best assigned. The proposed revisions to General Counsel's Office class specifications and proposed salary adjustments have been discussed, and agreed upon, with union representatives of the bargaining unit. In addition, staff recommends amending the FY 2023-24 Budget allocation of positions in the General Counsel's Office to implement the new organizational structure of duties and functions.

Proposal

Clerk of the Boards Office

Led by the Clerk of the Boards, COB staff provide a wide range of routine and complex work in support of the Hearing Board and the Governing Board. The classification study identified the need for the COB class specifications to better reflect the work being performed by staff. The role of the COB Office has evolved over the years, in terms of complexity and volume of work, resources to support the Boards, technology and responsibilities. The proposed revisions to the class specifications of Deputy Clerk, Deputy Clerk/Transcriber, and Senior Deputy Clerk clarify the critical duties performed in support of the Hearing Board and the Governing Board. This includes title changes to, respectively, Deputy Board Clerk I, Deputy Board Clerk II, and Senior Deputy

Board Clerk to establish a clear career ladder with the Clerk of the Boards, as well as to achieve consistency with industry standards.

The classification study also presented information that supports an adjustment of the salaries for the two higher level classifications, in order to better account for the expanded roles of these positions, as well as to fit within the labor market for these jobs.

Accordingly, staff recommends adopting revised class specifications (Attachment A) and an amendment to the Salary Resolution and the Teamsters MOU (Attachment C) for these COB positions.

General Counsel's Office

The General Counsel's Office is responsible for the Minor Source Penalty Assessment Program (MSPAP). Under this program, businesses receiving a Notice of Violation (NOV) and South Coast AQMD agree on actions for the business to comply with clean air requirements and the penalty for the violation. A Supervising Investigator and four Investigators are currently responsible for the implementation of the MSPAP, in terms of reviewing, preparing, and processing NOV cases for resolution of penalties through settlement agreements. In addition, these positions have a significant role in researching, investigating, and evaluating enforcement matters for potential civil and criminal prosecution. The Investigator class also coordinates activities with other government and law enforcement agencies for enforcement purposes.

Based upon an evaluation of the roles within the General Counsel's Office, it was determined that the use of the Senior Paralegal and the Paralegal classifications in the implementation of MSPAP would provide efficiencies in the settlement process. These positions currently prepare legal documents and conduct research in support of civil and criminal litigation conducted by attorneys in the General Counsel's Office. Their duties also include tracking penalty payments, following up on delinquent penalty payments, and filing and securing judgements and liens. Accordingly, staff recommends revising the class specifications for the Paralegal, Senior Paralegal, Investigator, and Supervising Investigator positions to move the settlement-related duties to the Paralegal series. (Attachment B) The revisions will focus the Investigator series on enforcement duties and these classifications will be assigned to the Office of Compliance & Enforcement (OCE).

Because the full responsibility for MSPAP implementation would be assigned to the Paralegal and Senior Paralegal positions, staff recommends the salaries for these two classifications be adjusted to match the salaries of the Investigator and Supervising Investigator positions, respectively. Staff further recommends increasing the salary of the Supervising AQ Inspector position to match the Supervising Investigator position, as part of the integration of the Inspector series into OCE. This would provide opportunities for transfer and cross-training within the OCE division (Attachment C).

Finally, this item proposes to add a Contracts Assistant position and a Senior Paralegal position to the General Counsel's Office, and to delete two Investigator positions from the FY 2023-24 Budget. (Attachment D) Adding a Contracts Assistant position would provide for the use of an existing Paralegal position that is being utilized as a Contract Assistant. Therefore, the final staffing count would be two Senior Paralegals and two Paralegals in the General Counsel's Office to perform settlement duties and the other existing paralegal work. A Supervising Investigator and two Investigator positions will be reassigned to OCE.

Resource Impacts

Sufficient funding exists in the FY 2023-24 Budget, and ongoing costs will be included in future year budgets.

Attachments

- A. Proposed revised class specifications for the Deputy Clerk, Deputy Clerk/Transcriber, and Senior Deputy Clerk positions
- B. Proposed revised class specifications for the Paralegal, Senior Paralegal, Investigator, and Supervising Investigator positions
- C. Proposed amendments to Section 53 of the Salary Resolution and Appendices A and B of the MOU between South Coast AQMD and Teamsters Local 911 for: revised Deputy Clerk/Transcriber, and Senior Deputy Clerk positions; the revised Paralegal and Senior Paralegal positions; and the Supervising AQ Inspector position
- D. Proposed additions and deletions of positions in the FY 2023-24 Budget



Deputy Board Clerk I

Class Code:
413

Bargaining Unit: Office, Clerical, & Maintenance

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Established Date: Sep 11, 1987
Revision Date: Oct 24, 2008, ~~September 1, 2023~~

DESCRIPTION:

DEFINITION: ~~Under general supervision, reviews petitions for variances and schedules hearings; prepares South Coast AQMD and Hearing Board agendas and arranges for public notification of hearings; performs staff support functions for South Coast AQMD Boards; and does other work as required.~~

Under immediate supervision, perform routine support for the Governing Board and Hearing Board; reviews petitions for variances and schedules hearings; arranges for public notification of hearings; performs staff support functions to Governing Board and Hearing Board members; communicates South Coast AQMD and Board policies, guidelines, procedures, and legal requirements to staff and the general public; processes and maintains Board records and files; performs related duties, as assigned.

SUPERVISION RECEIVED AND EXERCISED

Receives immediate supervision from the Senior Deputy Board Clerk. Exercises no direct supervision over staff.

CLASSIFICATION STANDARDS: ~~This single-position journey-level class reports to the Senior Deputy Clerk class and is characterized by the responsibility to review petitions for variances from South Coast AQMD Rules and Regulations, schedule and prepare the South Coast AQMD and Hearing Board agendas, arrange for public notification of hearings, and collect emission fees due as a result of variances granted, according to established procedures. The Deputy Clerk class is distinguished from the Deputy Clerk/Transcriber class in that the latter class has primary responsibility for recording, transcribing, and preparing the Findings and Decisions of South Coast AQMD Hearing Board proceedings.~~

CLASS CHARACTERISTICS

This is the entry-level classification in the Deputy Board Clerk series. Initially under close supervision, incumbents learn and perform routine support for the Governing Board and Hearing Board in the Clerk of the Boards Office. As experience is gained, assignments become more varied and complex; close supervision and frequent review of work lessen as an incumbent demonstrates skill to perform the work independently. Positions at this level usually perform most of the duties required of the positions at the Deputy Board Clerk II level but are not expected to function at the same skill level and usually exercise less independent discretion and judgment in matters related to work procedures and methods. Work is usually supervised while in progress and fits an established structure or pattern. Exceptions or changes in procedures are explained in detail as they arise.

ESSENTIAL DUTIES:

~~Processes petitions for variances from South Coast AQMD rules and regulations; examines petitions for completeness, accuracy, and compliance with South Coast AQMD rules, regulations, and Hearing Board procedures, and determines the type of hearing required.~~

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~~Schedules South Coast AQMD and Hearing board calendars; prepares daily hearing agendas and monthly schedule of hearings; assembles reports and materials for agenda packages and distributes to Board members and appropriate parties; prepares legal public notices as required by law; notifies all parties of cancelled hearing dates, including variance terminations. May attend hearings and prepare minutes.~~

-

~~Answers telephone, routes incoming calls, and addresses walk-in inquiries from petitioners, attorneys and other agencies to provide information on South Coast AQMD regulations, Hearing Board and petition procedures, and scheduled hearing dates; responds to petitioner's requests for variances and assists petitioners in completing the appropriate forms.~~

-

~~Collects and logs emission fees due as a result of variances granted; coordinates the verification of fees with the Engineering Division; notifies petitioners of overdue fees, processes routine refunds or the collection of additional fees; reconciles differences in fees by coordinating with the petitioners and appropriate South Coast AQMD divisions; prepares revenues from emission fees for deposit by balancing the check register and completing the bank deposit slip.~~

-

~~May contact Hearing Board members on ex parte petitions, take dictation and transcribe Decision and type Minute Orders for Board member's approval and signature.~~

~~Prepares and maintains case files to ensure completeness and accuracy; participates in special~~

projects by compiling, preparing, and assembling data into required format and distributing to appropriate parties.

EXAMPLES OF TYPICAL JOB FUNCTIONS (Illustrative Only)

Management reserves the right to add, modify, change, or rescind the work assignments of different positions and to make reasonable accommodations so that qualified employees can perform the essential functions of the job.

Some duties, knowledge, skills, and abilities may be performed in a learning capacity.

- Processes petitions for variances from rules and regulations; examines petitions for completeness, accuracy, and compliance with South Coast AQMD rules, regulations and Hearing Board procedures; determines type of hearing required.
- Schedules hearings; prepares daily hearing agendas and monthly schedule of hearings; assembles reports and materials for agenda packages and distributes to Board members and appropriate parties; prepares legal public notices as required by law; notifies all parties of cancelled hearing dates, including variance terminations; may attend hearings and prepare minutes.
- Answers telephone, routes incoming calls, and addresses walk-in inquiries from petitioners, attorneys, and other agencies to provide routine information on South Coast AQMD regulations, Governing Board procedures and Hearing Board and petition procedures, and scheduled meeting and hearing dates; responds to petitioner's requests for variances and assists petitioners in completing the appropriate forms.
- Collects and logs emission fees due as a result of variances granted; coordinates verification of fees with Engineering & Permitting Division staff; notifies petitioners of overdue fees; processes routine refunds or the collection of additional fees; reconciles differences in fees by coordinating with the petitioners and appropriate staff; prepares revenues from emission fees for deposit.
- May contact Hearing Board members on ex parte petitions; takes minutes, transcribes Decisions, and types Minute Orders for Board member's approval and signature.
- Refers inquiries as needed to appropriate staff; screens and distributes incoming correspondence.
- Prepares and maintains case files to ensure completeness and accuracy; participates in special projects by compiling, preparing, and assembling data into required format and distributing to appropriate parties.
- Coordinates with staff in preparation for Off-Site Hearings and meetings; serves as liaison with South Coast AQMD staff, attorneys for the parties, and the public; travels to off-site hearing location; sets up hearing room; prepares documents for Hearing Board members; assists the public with public comment cards during the hearing and answers procedural questions.
- Performs related duties as assigned.

MINIMUM REQUIREMENTS:

-EITHER I-

~~**EXPERIENCE:** Two years of progressively responsible clerical experience, one year of which must have been as a Senior Office Assistant.~~

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~~-OR II-~~

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~~**EXPERIENCE:** Two years of progressively responsible clerical experience in a legal office or quasi-judicial agency, one year of which must have included typing and processing a variety of legal documents.~~

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~~**SUBSTITUTION:** Completion of core courses from an accredited college or university with a major in secretarial sciences, court reporting, office practices, business education, or a closely related field; or completion of training from a recognized occupational training program in the referenced subject areas may substitute for one year of the required, non-specialized experience on the basis of 18 semester (27 quarter) units or 360 hours of training for one year of experience.~~

-

~~**KNOWLEDGE OF:** Basic hearing procedures and legal terminology to process, format, and type legal documents; correct English usage, grammar, spelling, vocabulary, and punctuation to prepare correspondence and proofread finished copy; modern office procedures and recordkeeping practices; standard office machines and automated equipment.~~

-

~~**ABILITY TO:** Understand and apply rules and procedures to screen petitions for variances and to develop and maintain the Hearing Board calendar; understand and follow verbal and written instructions; communicate effectively with the public, South Coast AQMD employees, and others to obtain and transmit information and explain South Coast AQMD regulations and Hearing Board and petition procedures; maintain accurate case files and records; operate standard office calculators, data entry terminals, microcomputers, and word processors.~~

~~**SKILLS:** Sufficient skills to type 45 net words per minute.~~

QUALIFICATIONS

Some duties, knowledge, skills, and abilities may be performed in a learning capacity.

Knowledge of:

- Indexing and filing rules and systems, including records management practices; South Coast AQMD organization and operating policies and procedures; legal requirements for filing, publishing, and processing of various Board actions.
- Basic functions and role of an appointed Board.

- Policies and procedures related to the Clerk of the Boards Office.
- Procedures to record and prepare minutes and procedural outcomes of hearings and meetings.
- Hearing procedures and legal terminology to process, format, and type legal documents.
- Standard procedures and rules for the conduct of hearings and meetings.
- Basic business mathematics.
- Cash handling procedures.
- Data processing systems and terminology.
- Applicable federal, state, and local laws, codes, and ordinances relevant to the area(s) of responsibility.
- Principles and techniques for working with groups and fostering effective team interaction to ensure teamwork is conducted smoothly.
- Techniques for providing a high level of customer service by effectively dealing with the public, vendors, contractors, and South Coast AQMD staff.
- The structure and content of the English language, including the meaning and spelling of words, rules of composition, and grammar.
- Modern equipment and communication tools used for business functions and program, project, and task coordination.
- Computers and software programs/applications (e.g., Microsoft software packages) to conduct, compile, and/or generate documentation.

Ability to:

- Read and comprehend a variety of technical reports, correspondence, and documents.
- Learn to explain South Coast AQMD Rules and regulations and Hearing Board procedures.
- Learn to understand and apply rules and procedures to screen petitions for variances and develop and maintain the Hearing Board calendar.
- Learn to record Board proceedings by hand or electronically; summarize actions accurately and expeditiously.
- Learn to prepare, format, write, and type Minute Orders and Findings and Decisions.
- Maintain accurate and complex case files and records.
- Compose correspondence and routine reports.
- Enter and retrieve data and information stored in a computerized record system with sufficient speed and accuracy to perform assigned work.
- Compile, check and verify data and information for accuracy and completeness.
- Compile and summarize data/information and maintain records.
- Understand, interpret, and apply all pertinent laws, codes, regulations, policies and procedures, and standards relevant to work performed.
- Effectively represent the South Coast AQMD in meetings with governmental agencies; community groups; various business, professional, and regulatory organizations; and in meetings with individuals.
- Independently organize work, set priorities, meet critical deadlines, and follow-up on assignments.
- Effectively use computer systems, software applications, and modern business equipment to perform a variety of work tasks.
- Communicate clearly and concisely, both orally and in writing, using appropriate English grammar and syntax.
- Use tact, initiative, prudence, and independent judgment within general policy, procedural, and legal guidelines.
- Establish, maintain, and foster positive and effective working relationships with those

contacted in the course of work.

Education and Experience:

Any combination of training and experience that would provide the required knowledge, skills, and abilities is qualifying. A typical way to obtain the required qualifications would be:

High School Diploma or equivalent and two (2) years of progressively responsible clerical experience, and one (1) year of responsible administrative clerical experience preparing legal documents and reports and/or taking and transcribing minutes.

Sufficient skill to type 45 net words per minute.

Licenses and Certifications:

- Possession of, or the ability to obtain, an appropriate, valid California driver's license upon appointment.

PHYSICAL DEMANDS

Must possess mobility to work in a standard office setting and use standard office equipment, including a computer, and to operate a motor vehicle to visit meeting sites; vision to read printed materials and a computer screen; and hearing and speech to communicate in person and over the telephone. Standing in and walking between work areas is frequently required. Finger dexterity is needed to access, enter, and retrieve data using a computer keyboard or calculator and to operate standard office equipment. Positions in this classification frequently bend, stoop, kneel, and reach to perform assigned duties, as well as push and pull drawers open and closed to retrieve and file information. Employees must possess the ability to lift, carry, push, and pull materials and objects up to 10 pounds.

ENVIRONMENTAL CONDITIONS

Employees work in an office environment with moderate noise levels, controlled temperature conditions, and no direct exposure to hazardous physical substances. Employees may interact with upset staff and/or public and private representatives in interpreting and enforcing departmental policies and procedures.

WORKING CONDITIONS

Must be willing to attend meetings outside of normal working hours and at locations other than South Coast AQMD offices.



~~Deputy~~ ~~Clerk/Transcriber~~ Deputy Board Clerk II

Class Code:
415

Bargaining Unit: Office, Clerical, & Maintenance

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Established Date: May 3, 1991
Revision Date: Oct 24, 2008, September 1, 2023

DESCRIPTION:

~~**DEFINITION:** Under general supervision, attends and records, in shorthand or by machine, Hearing Board proceedings; prepares Findings and Decisions as rendered by the Hearing Board; performs ministerial, stenographic, and staff support functions for South Coast AQMD's Hearing Board; and does other work as required.~~

DEFINITION

Under general supervision, perform routine to complex support for the Governing Board and Hearing Board; attends and records Hearing Board proceedings; assists Hearing Board members in the Hearing Board room by managing the logistical functioning and flow of meetings and proceedings; prepares Minute Orders and Findings and Decisions, as rendered by the Hearing Board; reviews petitions for variances and schedules hearings; collects Hearing Board petition and excess emissions fees; prepares Hearing Board agendas, and prepares legally required public notices for posting/publication for hearings; performs staff support functions to Governing Board and Hearing Board members; communicates South Coast AQMD and Board policies, guidelines, procedures, and legal requirements to staff and the general public; processes and maintains Board records and files; provides assistance with duties and tasks in support of the Governing Board; and performs related duties, as assigned.

SUPERVISION RECEIVED AND EXERCISED

Receives general supervision from the Senior Deputy Board Clerk. Exercises no direct supervision over staff.

~~**CLASSIFICATION STANDARDS:** This multi-position, journey-level class reports to the Senior Deputy Clerk class, and is characterized by the responsibility to perform ministerial, stenographic, and staff support functions for the Hearing Board. The Deputy Clerk/Transcriber class is distinguished from the Deputy Clerk class in that the latter class is characterized by responsibility to review petitions, schedule hearings, arrange for public notification, and collect fees. This class is distinguished from the Senior Deputy Clerk class in that the latter class performs supervisory responsibilities over subordinate, journey-level Hearing Board staff; performs the more complex, specialized, and responsible work of the Hearing Board; and assists the Clerk of the Boards with South Coast AQMD Board support activities.~~

CLASS CHARACTERISTICS

This is the fully qualified journey-level classification in the Deputy Board Clerk series. It reports to the Senior Deputy Board Clerk. Positions at this level perform the full range of duties as assigned, working independently, and exercising judgment and initiative. Positions at this level receive only occasional instruction or assistance as new or unusual situations arise and are fully aware of the operating procedures and policies of the work unit.

This class is distinguished from the Senior Deputy Board Clerk in that the latter is the full supervisory level in the series, provides supervision to lower-level support staff, and performs more complex, specialized, and responsible work.

ESSENTIAL DUTIES:

~~Attends Hearing Board proceedings to record, in shorthand or by machine, petitioners' arguments and testimony for a variance from South Coast AQMD's rules and regulations.~~

~~Transcribes shorthand or machine records of the Hearing Board's proceedings to prepare, format, and type draft Findings and Decisions for review and approval by Hearing Board members; proofreads copy for completeness, corrects errors in spelling, punctuation, or typing, and prepares finished copy for Board members' signatures; distributes copies of Hearing Board Findings and Decisions to appropriate South Coast AQMD personnel, petitioners, attorneys, and other public agencies.~~

~~Answers telephone, routes incoming calls, and addresses walk-in inquiries from petitioners, attorneys, and other agencies to provide routine information on South Coast AQMD regulations and Hearing Board and petition procedures; provides South Coast AQMD personnel and others with information on Hearing Board Findings and Decisions; schedules hearing dates and petitioners' requests for variances.~~

~~Participates in special projects by compiling, preparing, and assembling data into required format and distributing to appropriate parties.~~

~~May contact Hearing Board members on *ex parte* emergency petitions, take dictation and transcribe Decisions, and typing Minute Orders for Board members' approval and signature; may accept and time stamp petitions, receive payment of fees, and prepare receipts; may assist petitioners in completing appropriate forms and schedule routine Hearing Board cases; may screen and distribute incoming correspondence.~~

EXAMPLES OF TYPICAL JOB FUNCTIONS (Illustrative Only)

Management reserves the right to add, modify, change, or rescind the work assignments of different positions and to make reasonable accommodations so that qualified employees can perform the essential functions of the job.

➤ Attends Hearing Board proceedings in order to: 1) prepare minute orders for each hearing that includes a list of exhibits marked and/or admitted into evidence, as well as the names and identifying information for each hearing participant, including attorneys, witnesses and members of the public; take accurate notes as the Board deliberates and modifies proposed conditions, including all motions, and the votes of each Hearing Board member on each

motion; 2) take accurate notes of testimony and Hearing Board deliberations, reviewing the evidence on which the Board relied to prepare draft Findings and Decision; proofreads copy for completeness, accuracy and compliance with rules, policies, and regulations; and 3) prepare draft Findings and Decision for Hearing Board review, approval and signature, within strict time constraints.

- Records, reviews, and processes a variety of Hearing Board documents such as variance petitions, minute orders, Order for Abatement petitions, proposed orders, Findings and Decision and official notification for hearings/public meetings and motions.
- Assists the Hearing Board Chair or designee with prehearing teleconferences; arranges computer-based conference call system; takes notes during the teleconference; and, at the Chair's discretion, prepares the Prehearing Order following conclusion of the teleconference.
- Schedules hearings; prepares daily hearing agendas and maintains the hearing calendar; assembles documents for hearings, such as variance reports for agenda packages; and distributes to Board members and appropriate parties; prepares public notices as required by law; notifies all parties of cancelled hearing dates; and posts case information on the South Coast AQMD website.
- Edits verbatim transcripts of Governing Board meetings for use by the Senior Deputy Board Clerk.
- Answers telephone, routes incoming calls, and addresses walk-in inquiries from petitioners, attorneys, and other agencies to provide routine information on South Coast AQMD regulations and Governing Board meetings and Hearing Board petition procedures; provides staff and others with information on Hearing Board documents; refers inquiries as needed to appropriate staff; screens and distributes incoming correspondence.
- Acts for the Senior Deputy Clerk as directed.
- Works in collaboration with Hearing Board members to prepare for hearings and finished copies of documents related to proceedings for Board members' signatures.
- Prepares Minute Orders or Expanded Minute Orders, after each hearing that accurately reflects the proceedings for review, approval, and signature by Hearing Board members.
- Works closely with the Hearing Board Chair to coordinate and prepare for hearings and ex parte petitions.
- Serves as liaison between the parties and Hearing Board members to communicate and transmit information.
- Uses audio recording or computer-aided transcription software to prepare or edit written transcripts of Governing Board meetings.
- Assists Senior Deputy Board Clerk with posting Governing Board meeting agendas and filing Governing Board public notices in newspapers.
- Receives Hearing Board petitions and appeals by mail, hand delivery, or email; reviews to

ensure compliance with applicable Hearing Board rules and procedures and Governing Board rules and requests required documentation, if needed.

- Responds to inquiries on case-related issues and provide assistance with filling out forms and Hearing Board procedures; creates legal notices and publishes and/or posts notices as required; processes abatement orders filed by South Coast AQMD District Counsel.
- Receives payment for Hearing Board petition and excess emission fees and prepares receipt logs.
- Prepares and maintains case files to ensure completeness and accuracy; and scan and archive documents following electronic documents management procedures.
- Participates in special projects by compiling, preparing, and assembling data into required format and distributing to appropriate parties.
- Assists in preparing for off-site hearings; serves as liaison with staff, attorneys for the parties, and members of the general public; travels to off-site hearing location; sets up hearing room; prepares documents for Hearing Board members; assists the public with public comment cards and answers procedural questions.
- Assists in preparing for Governing Board meetings and annual retreat and may be required to attend to provide staff support.
- Retrieves and compiles documents for Governing Board and Hearing Board Public Records Act and administrative record requests.
- May be required to track Governing Board agenda items in agenda management system.
- Performs related duties as assigned.

MINIMUM REQUIREMENTS:

~~**SKILL:** Type 45 net words per minute and take dictation at a rate of 80 net words per minute.~~

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~~-EITHER I-~~

~~**EXPERIENCE:** Two years of progressively responsible stenographic experience, one year of which must have included typing and processing legal documents and reports.~~

~~-OR II-~~

~~**EXPERIENCE:** Two years of progressively responsible secretarial experience, one year of which must have included taking dictation and transcribing minutes for meetings.~~

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~~SUBSTITUTION:~~ ~~Completion of core courses from an accredited college or university with a major in secretarial sciences, court reporting, office practices, business education, or a closely related field, or completion of training from a recognized occupational training program in one of the referenced subject areas may substitute for the non-specialized experience required under either option described above on the basis of 18 semester (27 quarter) units or 360 hours of training for one year of experience.~~

~~KNOWLEDGE OF:~~ ~~Procedures to record and prepare minutes of meetings; hearing procedures and legal terminology to process, format, and type legal documents; correct English usage, grammar, spelling, vocabulary, and punctuation to prepare correspondence and proofread finished copy; modern office and recordkeeping practices; standard office machines and automated equipment.~~

~~ABILITY TO:~~ ~~Record Hearing Board proceedings in shorthand or by machine, and transcribe records accurately and expeditiously; prepare, format, and type Findings and Decisions; understand and follow oral and written instructions; communicate effectively with the public, South Coast AQMD employees, and others to obtain and transmit information and explain South Coast AQMD regulations and Hearing Board and petition procedures; maintain accurate and complex case files and records; operate standard office machines, including calculators, data-entry terminals, microcomputers, and word processing equipment; establish and maintain effective working relationships with South Coast AQMD personnel and others contacted in the course of work.~~

QUALIFICATIONS

Knowledge of:

- Procedures to record and prepare minutes and procedural outcomes of hearings and meetings.
- Hearing procedures and legal terminology to process, format, and type legal documents.
- Standard procedures and rules for the conduct of hearings and meetings.
- Indexing and filing rules and systems, including records management practices; South Coast AQMD organization and operating policies and procedures; legal requirements for filing, publishing, and processing of various Board actions.
- Basic functions and role of an appointed Board.
- Policies and procedures related to the Clerk of the Boards Office.
- Basic business mathematics.
- Cash handling procedures.
- Data processing systems and terminology.
- Applicable federal, state, and local laws, codes, and ordinances relevant to the area(s) of responsibility.
- Principles and techniques for working with groups and fostering effective team interaction to ensure teamwork is conducted smoothly.
- Techniques for providing a high level of customer service by effectively dealing with the public, vendors, contractors, and South Coast AQMD staff.
- The structure and content of the English language, including the meaning and spelling of words, rules of composition, and grammar.
- Modern equipment and communication tools used for business functions and program, project, and task coordination.
- Computers and software programs/applications (e.g., Microsoft software packages) to conduct, compile, and/or generate documentation.

Ability to:

- Record Board proceedings by hand or electronically; summarize actions accurately and expeditiously.
- Prepare, format, write, and type Minute Orders and Findings and Decisions.
- Utilize critical thinking skills and knowledge of the South Coast AQMD rules and state law to independently write the Findings and Decision for Hearing Board review, approval and signature, reviewing the evidence on which the Board relied and providing the reasoning the Board used in its public deliberations to reach its conclusion on each of the six legally required findings.
- Read and comprehend a variety of technical reports, correspondence, and documents.
- Explain South Coast AQMD rules and regulations and Hearing Board procedures.
- Understand and apply rules and procedures to screen petitions for variances and develop and maintain the Hearing Board calendar.
- Maintain accurate and complex case files and records.
- Compose correspondence and routine reports.
- Enter and retrieve data and information stored in a computerized record system with sufficient speed and accuracy to perform assigned work.
- Compile, check and verify data and information for accuracy and completeness.
- Compile and summarize data/information and maintain records.
- Understand, interpret, and apply all pertinent laws, codes, regulations, policies and procedures, and standards relevant to work performed.
- Effectively represent South Coast AQMD in meetings with governmental agencies; community groups; various business, professional, and regulatory organizations; and in meetings with individuals.
- Independently organize work, set priorities, meet critical deadlines, and follow-up on assignments.
- Effectively use computer systems, software applications, and modern business equipment to perform a variety of work tasks.
- Communicate clearly and concisely, both orally and in writing, using appropriate English grammar and syntax.
- Use tact, initiative, prudence, and independent judgment within general policy, procedural, and legal guidelines.
- Establish, maintain, and foster positive and effective working relationships with those contacted in the course of work.

Education and Experience:

Any combination of training and experience that would provide the required knowledge, skills, and abilities is qualifying. A typical way to obtain the required qualifications would be:

High School Diploma or equivalent and three (3) years of progressively responsible clerical experience, which should include two (2) years of responsible administrative clerical experience preparing legal documents and reports and/or taking and transcribing minutes.

Sufficient skills to type 45 net words per minute.

Licenses and Certifications:

Possession of, or the ability to obtain, an appropriate, valid California driver's license upon appointment.

PHYSICAL DEMANDS

Must possess mobility to work in a standard office setting and use standard office equipment, including a computer, and to operate a motor vehicle to visit meeting sites; vision to read printed materials and a computer screen; and hearing and speech to communicate in person and over the telephone. Standing in and walking between work areas is frequently required. Finger dexterity is needed to access, enter, and retrieve data using a computer keyboard or calculator and to operate standard office equipment. Positions in this classification frequently bend, stoop, kneel, and reach to perform assigned duties, as well as push and pull drawers open and closed to retrieve and file information. Employees must possess the ability to lift, carry, push, and pull materials and objects up to 10 pounds.

ENVIRONMENTAL CONDITIONS

Employees work in an office environment with moderate noise levels, controlled temperature conditions, and no direct exposure to hazardous physical substances. Employees may interact with upset staff and/or public and private representatives in interpreting and enforcing departmental policies and procedures.

WORKING CONDITIONS

Must be willing to attend meetings outside of normal working hours and at locations other than South Coast AQMD offices.



Senior Deputy Board Clerk

Class Code:
412

Bargaining Unit: Office, Clerical, & Maintenance

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
Established Date: May 3, 1991
Revision Date: Oct 31, 2008, September 1, 2023

DESCRIPTION:

DEFINITION: ~~Under general supervision, assigns, coordinates, reviews, and participates in a variety of ministerial, stenographic, and staff support functions for South Coast AQMD Boards; performs complex, specialized, and responsible Hearing Board staff activities; and does other work as required.~~

DEFINITION

Under general direction, plans, organizes, supervises, and reviews the work of staff involved in providing support for the Governing Board and Hearing Board; performs complex, specialized, and responsible duties to assist in the operations the Clerk of the Boards Office; provides technical guidance and training to subordinate staff; prepares agendas and compiles supporting materials, records, and documents required for Board meetings; may prepare and edit minutes; maintains records, and other information for the Boards and the South Coast AQMD; acts as the Clerk of the Boards as assigned; performs related duties, as assigned.

SUPERVISION RECEIVED AND EXERCISED

Receives general direction from the Clerk of the Boards. Exercises direct or general supervision over administrative and clerical staff.

CLASSIFICATION STANDARDS: ~~This single position class reports to the Clerk of the Boards and is characterized by the responsibility to act in a supervisory capacity over journey-level Hearing Board staff, and to perform a variety of complex, specialized, and responsible ministerial, stenographic, and staff support functions. This class is further characterized by the extensive experience and knowledge of ministerial and staff support methods and procedures relating to meetings of the Boards; the exercise of extensive public contact responsibilities requiring the explanation of detailed South Coast AQMD rules, state and federal regulations, and hearing procedures; and the responsibility to act for the Clerk of the Boards, as required. This class is distinguished from the Clerk of the Boards class in that the latter class plans, organizes, and manages the daily operations related to the activities of both Boards.~~

CLASS CHARACTERISTICS

This is the full supervisory-level class in the Deputy Board Clerk series. Incumbents are responsible for planning, organizing, supervising, reviewing, and evaluating the work of administrative and clerical support staff. Performance of the work requires exercising considerable use of independent judgement, initiative, and discretion within established guidelines.

This class is distinguished from the Clerk of the Boards class in that the latter class has overall management responsibility of the Clerk of the Boards office.

ESSENTIAL DUTIES:

~~Assigns, coordinates, reviews, and participates in ministerial, stenographic, and staff support functions for the South Coast AQMD Boards, and performs the more complex, specialized, and responsible work of the Hearing Board.~~

~~Reviews the Findings and Decisions prepared by staff to ensure accuracy, completeness, and adherence to instructions, established format, and work methods; coordinates and reviews the screening of petitions for variance, the scheduling of cases for Hearing Board meetings, and the collection of fees; participates in the evaluation of staff by counseling employees on work assignments and performance problems; prepares performance evaluations.~~

~~Monitors the workload and prioritizes assignments to ensure the timely completion of work; compiles statistical data and prepares reports on Hearing Board activities for review by the Clerk of the Boards.~~

~~Participates in the selection and training of new employees on operational and Hearing Board rules, regulations, and procedures; provides technical guidance on difficult work problems by explaining the application of operational procedures specific to the situation.~~

~~Coordinates activities for South Coast AQMD Board and Hearing Board meetings, including scheduling meeting rooms and arranging for equipment; monitors case file maintenance and ensures the availability of appropriate supporting documentation and the completion of all legal notice requirements.~~

~~Attends South Coast AQMD and Hearing Board meetings, monitors and records hearings, and advises the chairperson of appropriate procedures; prepares, formats, types, and distributes Minute Orders on actions taken by the Board.~~

~~Screens and routes incoming calls; coordinates the scheduling of cases and acts as liaison with Hearing Board members and legal staff; responds to a variety of calls, requests, and complaints referred by staff.~~

~~Monitors the payment of excess emission fees due as a result of variances granted; coordinates with appropriate parties to reconcile the more difficult fee discrepancies and to process claims for reimbursement; drafts public notices regarding Hearing Board matters not addressed in the Health and Safety Code.~~

~~Coordinates special projects by prioritizing, assigning, monitoring, and reviewing the compilations and preparation of public records and administrative transcripts; prepares the certification of records and distributes to the requesting party.~~

~~Performs a variety of secretarial and staff support functions for Hearing Board members; prepares a variety of non-routine correspondence for own signature and for approval by Board members or the Clerk of the Boards.~~

~~Acts for the Clerk of the Boards, as required.~~

EXAMPLES OF TYPICAL JOB FUNCTIONS (Illustrative Only)

Management reserves the right to add, modify, change, or rescind the work assignments of different positions and to make reasonable accommodations so that qualified employees can perform the essential functions of the job.

- Plans, organizes, assigns, supervises, and reviews the work of staff assigned to the Clerk of the Boards Office; trains staff in work procedures; evaluates employee performance, counsels employees, and effectively recommends initial disciplinary action; assists in selection and promotion.
- Participates in the development of goals, objectives, policies, and procedures for assigned services and programs, and preparation of the department budget; recommends and participates in the implementation of policies, and work standards.
- Monitors activities and workflow of staff assigned to provide support to the activities of the Governing Board and Hearing Board; identifies opportunities for improving service delivery and procedures; provides recommendations concerning process changes; reviews with appropriate management staff; implements improvements.
- Determines and recommends equipment, materials, and staffing needs for assigned operations, projects, and programs; maintains a variety of records and prepares routine reports of work performance.
- Attends Governing Board meetings, and records official actions taken at Governing Board meetings.
- Assists in the preparation and distribution of Governing Board agenda packets; receives and reviews agenda items to ensure that all submittals are complete and follow established procedures; and posts agendas in compliance with the Brown Act.
- Prepares, coordinates, and reviews Governing Board agenda; tracks, edits, and processes agenda items in tracking system; distributes weekly agenda update to South Coast AQMD staff; prepares correspondence and documents; ensures the legal publication and posting of Board agenda; assigns and coordinates distribution of signed Board letters.
- Establishes, maintains, and updates various files, calendars, and schedules; follows up on matters with critical time deadlines.
- Composes correspondence independently or from brief notes which may require interpretation of policies, procedures, and regulations.
- Provides administrative or related office support to Board members as required.
- Compiles statistical data and prepares reports on Governing Board and Hearing Board activities for review by the Clerk of the Boards and participates in the preparation of the department budget.
- Reviews the Governing Board and Hearing Board notices, Minute Orders, and Findings and Decisions documents prepared by staff to ensure accuracy, completeness, and adherence to established format procedures, and legal requirements.

- Coordinates and reviews the screening of petitions for variance, the scheduling of cases for Hearing Board meetings, and the collection of fees.
- Coordinates activities for Board meetings including scheduling meeting rooms and arranging for equipment; monitors case file maintenance and ensures the availability of appropriate supporting documentation and the completion of all legal notice requirements.
- Maintains the department webpages; ensures accurate and current information is posted.
- Attends Governing Board and Hearing Board meetings, hearing proceedings as required; assists the public with questions regarding meeting and agenda items; monitors and records hearings; advises the Board chairperson of appropriate procedures; prepares Governing Board minutes for review by the Clerk of the Boards.
- Screens and routes incoming calls; coordinates the scheduling of cases and acts as liaison with Governing Board and Hearing Board members and legal staff; responds to a variety of calls, requests, and complaints referred by staff.
- Monitors the payment of Board petition and excess emission fees; coordinates with appropriate parties to reconcile the more difficult fee discrepancies and to process claims for reimbursement; drafts public notices regarding Governing Board and Heard Board matters.
- Prepares and maintains case files to ensure completeness and accuracy, and participates in special projects by compiling, preparing, and assembling data into required format and distributing to appropriate parties.
- Provides information regarding the Boards and staff, other agencies, and the general public.
- Accepts, processes, and transmits subpoenas and claims, ensuring compliance with South Coast AQMD policies and procedures.
- Coordinates the centralized records management system to ensure proper maintenance and disposition practices in accordance with the records retention policy; provides information gathering and records retrieval research services to South Coast AQMD staff; and assists the Clerk of the Boards in organizing and maintaining history of the Boards including resolutions, formal minutes, and agenda packets.
- Prepares, compiles, and processes public records and administrative records requests.
- Coordinates with South Coast AQMD staff and outside vendors in preparation for off-site proceedings; schedules meeting rooms; arranges for equipment; ensures availability of appropriate supporting documentation; schedules staff to attend and assist with proceedings.
- Acts for the Clerk of the Boards, as assigned.
- Performs related duties as assigned.

MINIMUM REQUIREMENTS:

SKILL: ~~Type 45 net words per minute and take dictation at the rate of 80 net words per minute.~~

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~~-EITHER I-~~

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EXPERIENCE: ~~Two years of progressively responsible stenographic and staff support experience, one year of which must have been as a Deputy Clerk/Transcriber or Legal Secretary.~~

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~~-OR II-~~

~~**EXPERIENCE:** Two years of progressively responsible legal stenographic experience, one year of which must have included taking dictation, transcribing, and typing a variety of legal documents and reports.~~

~~-OR III-~~

~~**EXPERIENCE:** Three years of progressively responsible stenographic or secretarial experience, two years of which must have been as a Secretary and included taking dictation and transcribing minutes of meetings.~~

~~**SUBSTITUTION:** Completion of core courses from an accredited college or university with a major in secretarial sciences, office practices, court reporting, business education, or a closely related field, or completion of training from a recognized occupational training program in one of the above-listed areas may substitute for one year of the non-specialized experience required under any of the above-described options on the basis of 18 semester (27 quarter) units or 360 hours of training for one year of experience.~~

~~**KNOWLEDGE OF:** General South Coast AQMD operations, rules, policies, and procedures; staff support procedures relating to meetings of the Boards or other legislative or administrative boards and committees; correct English usage, spelling, punctuation, grammar, and vocabulary to prepare correspondence and to review and correct the work of staff; modern office practices, standard office machines, and automated equipment; arithmetical computation to compile and prepare statistical data and reports.~~

~~**ABILITY TO:** Assign, coordinate, review, and participate in the work of staff engaged in ministerial, stenographic, and staff support functions for South Coast AQMD's Boards; communicate effectively with a variety of administrators, Board members, officials, and the public; explain and apply detailed laws, rules, policies, and procedures, and resolve procedural problems; operate standard office machines and automated equipment, including calculators, data-entry terminals, microcomputers, and word processing equipment; establish and maintain effective working relationships with South Coast AQMD personnel and others contacted in the course of work.~~

QUALIFICATIONS

Knowledge of:

- Principles and practices of employee supervision, including work planning, assignment review and evaluation, discipline, and the training of staff in work procedures.
- Principles and practices of leadership.
- Standard procedures and rules for the conduct of hearings and meetings.
- Functions and role of an appointed Board.
- Policies and procedures related to the Clerk of the Boards Office.
- Legal requirements for filing, publishing, and processing of various Board matters.
- Records management principles and practices.
- Standard office administrative and secretarial practices and procedures, including filing and business letter writing.
- Arithmetical computation to compile and prepare statistical data and reports.
- Data processing systems and terminology.

- Applicable federal, state, and local laws, codes, and ordinances relevant to the area(s) of responsibility.
- Principles and techniques for working with groups and fostering effective team interaction to ensure teamwork is conducted smoothly.
- Techniques for providing a high level of customer service by effectively dealing with the public, vendors, contractors, and South Coast AQMD staff.
- The structure and content of the English language, including the meaning and spelling of words, rules of composition, and grammar.
- Modern equipment and communication tools used for business functions and program, project, and task coordination.
- Computers and software programs/applications (e.g., Microsoft software packages) to conduct, compile, and/or generate documentation.

Ability to:

- Select and supervise staff, provide training and development opportunities, ensure work is performed effectively, and evaluate performance in an objective and positive manner.
- Assist in developing and implementing goals, objectives, practices, policies, procedures, and work standards.
- Organize and maintain accurate and complex recordkeeping and indexing systems.
- Research and organize pertinent back-up materials for Board agenda items.
- Process various applications, submittals, and documents in accordance with established codes and requirements.
- Prepare clear, concise, and complete meeting minutes, documentation, and other reports and correspondence.
- Read and comprehend a variety of technical reports, correspondence, and documents.
- Compile, check, proofread and verify data and information for accuracy and completeness.
- Understand, interpret, and apply all pertinent laws, codes, regulations, policies and procedures, and standards relevant to work performed.
- Effectively represent the office and the South Coast AQMD in meetings with governmental agencies; community groups; various business, professional, and regulatory organizations; and in meetings with individuals.
- Understand the organization and operation of the South Coast AQMD and of outside agencies as necessary to assume assigned responsibilities.
- Enter and retrieve data and information stored in a computerized record system with sufficient speed and accuracy to perform assigned work.
- Independently organize work, set priorities, meet critical deadlines, and follow-up on assignments.
- Effectively use computer systems, software applications, and modern business equipment to perform a variety of work tasks.
- Communicate clearly and concisely, both orally and in writing, using appropriate English grammar and syntax.
- Use tact, initiative, prudence, and independent judgment within general policy, procedural, and legal guidelines.
- Establish, maintain, and foster positive and effective working relationships with those contacted in the course of work.

Education and Experience:

Any combination of training and experience that would provide the required knowledge, skills, and abilities is qualifying. A typical way to obtain the required qualifications would be:

High School Diploma or equivalent and four (4) years of increasingly responsible administrative clerical experience providing support to and in the taking and preparing of minutes for a policymaking and/or regulatory governing body equivalent to a Deputy Board Clerk II with the South Coast AQMD.

Sufficient skill to type 55 net words per minute.

Licenses and Certifications:

Possession of, or the ability to obtain, an appropriate, valid California driver's license upon appointment.

PHYSICAL DEMANDS

Must possess mobility to work in a standard office setting and use standard office equipment, including a computer, and to operate a motor vehicle to visit South Coast AQMD meeting sites; vision to read printed materials and a computer screen; and hearing and speech to communicate in person and over the telephone. Standing in and walking between work areas is frequently required. Finger dexterity is needed to access, enter, and retrieve data using a computer keyboard or calculator and to operate standard office equipment. Positions in this classification frequently bend, stoop, kneel, and reach to perform assigned duties, as well as push and pull drawers open and closed to retrieve and file information. Employees must possess the ability to lift, carry, push, and pull materials and objects up to 10 pounds.

ENVIRONMENTAL CONDITIONS

Employees work in an office environment with moderate noise levels, controlled temperature conditions, and no direct exposure to hazardous physical substances. Employees may interact with upset staff and/or public and private representatives in interpreting and enforcing departmental policies and procedures.

WORKING CONDITIONS

Must be willing to attend meetings outside of normal working hours and at locations other than South Coast AQMD offices.



July 2023

FLSA: Non-Exempt

PARALEGAL

DEFINITION: Under general supervision, assists attorneys in pretrial and trial preparation; prepares exhibits and witnesses for trial and the Hearing Board; analyzes existing information regarding the case at hand and research pertinent case law; researches and develops the content of legal documents; review, research, compiles case histories of violations, and assesses civil penalties to negotiate settlements; and does other work as required.

CLASSIFICATION STANDARDS: This multiple-position class provides paralegal assistance to attorneys engaged in civil, criminal, or administrative law in the ~~Chief Prosecutor's Office~~ or South Coast AQMD General Counsel's Office. The Paralegal class is distinguished from the legal clerical classes by its responsibility for conducting legal research and analyzing legal opinions and rulings as required in the preparation and conduct of litigation proceedings, as well as responsibility to implement the Minor Source Penalty Assessment Program.

ESSENTIAL DUTIES:

Researches and analyzes law sources such as rules, regulations, statutes, ordinances, court decisions, legal documents and articles for use in preparing legal documents such as briefs, pleadings, contracts, opinions, etc., for review, approval, and use by an attorney.

Drafts motions, memoranda of points and authorities, interrogatories and answers, complaints and answers, crossclaims, affidavits and declarations.

Analyzes and summarizes legislative bills and researches legislative history for determination of legislative intent, sources of law and systems by which laws are administered.

Organizes and indexes trial documents, prepares exhibits and assists attorneys at trial and administrative hearings by keeping track of exhibits, testimony, and documents.

Reviews the Minor Source Penalty Assessment Program guidelines and predetermined penalties to establish and recommend fines to be imposed upon the violator.

Notifies the violator, by mail or otherwise, of South Coast AQMD's offer to process the violation through the Minor Source Penalty Assessment Program and of the recommended settlement.

Conducts conferences with the violator, defense or prosecuting attorneys or other representatives, in order to review and explain the Notice of Violation case elements. South Coast AQMD policies and procedures, and to answer questions; evaluates mitigating circumstances which may be presented and within guidelines, recommends settlements and makes arrangements for payment.

Tracks fine payment schedules and follows up on delinquent payments; tracks statutes of limitations on in house cases.

Reviews legal documents and forms for completeness and conformance to specific requirements set forth in applicable legal codes.



July 2023

FLSA: Non-Exempt

Gathers factual information and performs routine legal research to assist an attorney in determining appropriate legal action.

Summarizes, organizes, and indexes prior opinions, testimony, depositions, documentary material from interrogatories and abstracts.

MINIMUM REQUIREMENTS

Education and Experience:

-EITHER-

Successful completion of a Certificated Paralegal Program approved by the American Bar Association or graduation from a recognized law school AND two years of experience in a law office or governmental legal agency performing paralegal duties that demonstrates possession of the knowledges and abilities listed as minimum requirements or eighteen months of full-time experience performing paralegal duties for South Coast AQMD.

- OR II -

Four years of training or experience in a law office performing paralegal duties that demonstrate possession of the knowledges and abilities listed as minimum requirements. Legal/paralegal courses or training may be substituted for up to two years of the required experience at the rate of three semester or four and one-half quarter units for one month of experience. Civil law paralegal experience is preferred, but not required.

KNOWLEDGE OF: Principles, concepts, and methodology of legal research, discovery and fact investigation; legal principles and practices; legal terminology; principles of legal writing; civil and criminal legal processes; content and language requirements of legal documents, such as pleadings, briefs, ordinances and depositions; principles of effective interviewing methods and techniques; oral and written communication methods and techniques.

ABILITY TO: Identify, evaluate and extract pertinent information from a wide variety of sources in the preparation of cases and legal documents; use judgment in analyzing complex issues and determining alternate courses of action to obtain required information; analyze and apply established guidelines to case elements, pertinent codes, laws, ordinances, and statutes to violators and/or counsel in order to reach settlement agreements and/or compliance; extract and organize information from diverse, complex and obscure sources including files, depositions, or other evidentiary material; develop and refine content and language of legal documents such as affidavits, declarations, complaints, motions, petitions, interrogatories and accounts, or assist an attorney in performing such work; establish and maintain effective working relationships with South Coast AQMD personnel, governmental and judicial agencies, and others contacted in the course of performing duties and responsibilities.



July 2023

FLSA: Non-Exempt

SENIOR PARALEGAL

DEFINITION: Under general supervision, coordinates, reviews, and participates in the work of legal research support staff in the ~~Chief Prosecutor's~~ General Counsel's Office; prepares, and assists others in preparing exhibits and witnesses for trial and appearance before the Hearing Board; analyzes existing information regarding the cases at hand; provides support services in the preparation, processing, and assessment of civil penalties to negotiate settlements; and researches pertinent case laws; researches and develops legal documents; and does other work as required.

CLASSIFICATION STANDARDS: This ~~single position journey~~ class reports to the Chief ~~Prosecutor~~ Deputy Counsel and is responsible for coordinating, reviewing, and prioritizing the work of paralegals, law clerks, and student interns assigned to assist attorneys in pretrial and trial preparation. In addition, the incumbent performs the more difficult paralegal assignments and evaluates, develops, and modifies policies, procedures, and work methods for legal research support staff. This class is further characterized by the responsibility to review and recommend settlements that fall within the Minor Source Penalty Assessment Program guidelines.

ESSENTIAL DUTIES

Coordinates, reviews, and prioritizes the work of paralegals, law clerks, and student interns assigned to assist attorneys in pretrial and trial preparation, and reviews their work to ensure accuracy, completeness, and adherence to court rules and attorney's instructions; provides technical assistance to subordinate staff.

Completes the more difficult technical projects assigned by the Chief ~~Prosecutor~~ Deputy Counsel and attorney staff, including researching and analyzing rules, regulations, statutes, ordinances, court decisions, legal documents, and articles for use in preparing legal documents, such as briefs, pleadings, contracts, opinions, etc., for review, approval, and use by an attorney.

Drafts motions, memoranda of points and authorities, interrogatories, and answers; reviews complaints and answers, cross-claims, affidavits, and declarations.

Analyzes and summarizes the most complex legislative bills and researches legislative history for determination of legislative intent, sources of law, and judicial systems by which laws are administered.

Organizes and indexes trial documents; prepares exhibits and assists attorneys, at trials and administrative hearings, by keeping track of exhibits, testimony, and documents.

Gathers detailed factual information and performs complex legal research to assist attorneys in determining appropriate legal actions and summaries; organizes and indexes prior opinions, testimony, depositions, and documentary material from interrogatories and abstracts.

Evaluates, develops, and modifies policies, procedures, and work methods for legal research support staff.

Plans, prioritizes, assigns, supervises, and reviews the activities of the staff engaged in the review, preparation, and processing of settlement agreements.

Coordinates, reviews, and makes recommendations on settlements that fall within the Minor Source Penalty Assessment Program's established guidelines.

Reviews the Minor Source Penalty Assessment Program guidelines and predetermined penalties to establish and recommend fines to be imposed upon the violator.

Coordinates or conducts the research of the case disposition statistics and other case-related information for special administrative reports and projects.

Conducts conferences with the violator, defense or prosecuting attorneys or other representatives, in order to review and explain the Notice of Violation case elements, South Coast AQMD policies and procedures, and to answer questions.

MINIMUM REQUIREMENTS

Experience:

EITHER I

One year of experience in the class of Paralegal.

-OR II-

Successful completion of a paralegal certificate program approved by the American Bar Association or graduation from an accredited law school AND three years of experience in a law office or governmental legal agency performing paralegal duties.

KNOWLEDGE OF: Principles and practices of supervision; principles, concepts, and methodology of legal research, discovery, and fact-finding investigation; legal principles and practices; legal terminology; principles of legal writing; civil and criminal legal processes; content and language requirements of legal documents, such as pleadings, briefs, ordinances, and depositions; principles of effective interviewing methods and techniques; oral and written communication methods and techniques.

ABILITY TO: Coordinate, review, and prioritize the work of para-professional staff; train and evaluate staff; identify, evaluate, and extract pertinent information from a wide variety of sources in the preparation of cases and legal documents; use judgment in analyzing complex issues and determining alternate courses of action to obtain required information; analyze and apply established guidelines to case elements, pertinent codes, laws, ordinances, and statutes to violators and/or counsel in order to reach settlement agreements and/or compliance; communicate effectively orally and in writing; develop and refine content and language of legal documents, such as affidavits, declarations, complaints, motions, petitions, and interrogatories or assist an attorney in performing such work; understand and apply South Coast AQMD policies, rules, and regulations; assist in the evaluation of work performance of subordinate personnel; establish and maintain effective working relationships with South Coast AQMD personnel and others contacted in the course of work; apply established guidelines to case elements and South Coast AQMD Rules, policy and procedures to violators and/or counsel in order to reach an agreed settlement-



INVESTIGATOR

DEFINITION: Under direction of a Supervising Investigator, provides investigative services within the ~~Legal Department~~Office of Compliance and Enforcement, in the review, preparation, and processing of Notices of Violation ~~for and~~ criminal prosecution, and civil and mutual settlement agreements referrals; and does other work as required.

CLASSIFICATION STANDARDS: This multi-position class is the journey-level class of the Investigator series. Incumbents of this class may also come from the journey-level Inspector classification. This class requires ~~the complete~~ understanding of the principles, practices, and methods necessary to review, research, prepare, and process ~~Notice of Violation cases~~ enforcement matters for civil and criminal prosecution, and civil and mutual settlement agreements. Incumbents of this class are required to independently perform a variety of assignments of a broad scope under direction.

ESSENTIAL DUTIES:

Reviews field inspection and supplemental reports to ensure the sufficiency and validity of information concerning ~~the Notice of Violation enforcement matters~~; researches permit variances, permit regulations, and other South Coast AQMD data to ensure the sufficiency and validity of information supporting the violation; conducts inquiries, obtains and compiles records and information from a variety of sources to verify the elements of the violation and to support civil or criminal prosecution, and civil and mutual settlement agreements; determines the status of companies in noncompliance and/or corroborates compliance attainment through field inspections or assigned field observations.

~~Reviews the Mutual Settlement Agreement program guidelines and predetermined penalties to establish and recommend fines to be imposed upon the violator.~~

~~Notifies the violator, by mail, of South Coast AQMD's offer to process the violation through the Mutual Settlement Agreement program and of the recommended settlement.~~

~~Conducts conferences with the violator, defense or prosecuting attorneys or other representatives, in order to review and explain the Notice of Violation case elements. South Coast AQMD policies and procedures, and to answer questions; evaluates mitigating circumstances which may be presented and, within the guidelines, recommends settlements and makes arrangements for payment.~~

~~Processes the necessary legal paperwork between South Coast AQMD and court jurisdiction where the violation occurred, in order to obtain a summons and arraignment for prosecution.~~ an inspection warrant.

~~May represent~~ appear on behalf of the South Coast AQMD at hearings, arraignments, pretrials, and trials; presents information and data on businesses cited for violating South Coast AQMD rules and regulations, and state and federal laws controlling air quality standards.

Attends arraignments, pretrial and trial settings, and assists attorneys in developing and preparing civil and criminal cases for prosecution; explains methods of air contaminant emission controls and may provide South Coast AQMD's recommendations concerning the extent of penalties to the court; ~~on~~



July 2023

FLSA: Non-Exempt

approval of management staff, may process cases which are to be dispositioned through civil compromise.

Coordinates communication and operations with outside governmental agencies for enforcement, investigation, or informational purposes.

May provide procedural guidance or assist in the training of new employees; may assign and coordinate the work of a small clerical unit.

MINIMUM REQUIREMENTS

Education and Experience:

EXPERIENCE: One year of experience in the class of Air Quality Inspector II or two years of civil and/or criminal investigative experience with a public law enforcement agency.

EDUCATION: Completion of at least 34 semester (51 quarter) units of core courses from an accredited college or university, preferably in an academic discipline related to the assigned office/division area of specialization.

KNOWLEDGE OF: Principles and practices of investigative techniques; principles, practices, and methods of case research, and review and preparation for civil and criminal processing; principal sources of information required to support civil and criminal prosecution; functions of judicial agencies; filing and courtroom procedures; principles of effective interviewing methods and techniques; oral and written communication methods, and techniques required to obtain from and provide information to recalcitrant businesses and individuals.

ABILITY TO: Review field inspection reports; identify and compile documentation required to prepare and verify case elements, and support civil and criminal prosecution; ~~apply established guidelines to case elements and South Coast AQMD policy and procedures to violators, and/or counsel in order to reach an agreed settlement;~~ prepare and maintain concise and accurate records, files, and reports; establish and maintain effective working relationships with South Coast AQMD personnel, governmental and judicial agencies, and others contacted in the course of the work.



September 2023

FLSA: Non-Exempt

SUPERVISING INVESTIGATOR

DEFINITION: Under general direction of ~~the Investigations~~ a Senior Enforcement Manager, plans, assigns, coordinates, and reviews the work of staff providing investigative support services to ~~the Chief Prosecutor's Office, of Compliance and Enforcement and the South Coast AQMD Counsel's Office and to the Enforcement Division~~ in the preparation and processing of Notice of Violation cases enforcement matters for civil and criminal prosecution, and civil; and does other work as required.

CLASSIFICATION STANDARDS: This multi-position class is the supervisory-level class of the Investigator series and reports to the Investigations a Senior Enforcement Manager for policy and program direction. Incumbents of this class may also come from the lead or journey-level Inspector classification. This class is characterized by the responsibility for supervising, assigning, prioritizing, and reviewing the ~~processing of Notice of Violation cases~~ investigation of enforcement matters.

ESSENTIAL DUTIES

Participates in the selection of staff; provides or coordinates staff training; works with employees to correct deficiencies; implements discipline procedures.

Plans, prioritizes, assigns, supervises, and reviews the activities of staff engaged in the review, preparation, and ~~processing of Notice of Violation cases~~ investigation of enforcement matters for civil and criminal prosecution, or civil and criminal referrals.

Prioritizes the assignment of ~~cases~~ enforcement matters to balance workloads and ensure the timely completion of cases; adjusts work schedules and assignments to enhance the efficiency and effectiveness of staff activities.

~~Coordinates, reviews, and makes recommendations on settlements which fall within the program's established guidelines.~~

Reviews, recommends, and implements policies and procedures in ~~processing cases~~ investigating enforcement matters and improving the operational activities of the unit.

Trains and assists in the evaluation of staff performance in ~~cases~~ the investigation of enforcement matters, and the application of South Coast AQMD regulations, rules, and guidelines; provides technical expertise on reference sources, case strategies, and courtroom procedures.

Conducts conferences with a variety of legal representatives, and public and private agency officials to interpret and discuss South Coast AQMD rules; provides information on South Coast AQMD policies and procedures, and answers questions on case-related information.

Supervises and reviews field investigations and supplemental reports to ensure the sufficiency and validity of information concerning Notices of Violation; researches permit variances, permit regulations, and other South Coast AQMD data to ensure the sufficiency and validity of information supporting the violation; conducts inquiries, and obtains and compiles records and information from a variety of

sources to verify the elements of the violation, and to support civil and criminal prosecution and mutual settlement agreements; determines the status of companies in noncompliance through field inspectors or assigned field observations.

~~Reviews the Mutual Settlement Agreement Program guidelines and predetermined penalties to establish and recommend fines to be imposed upon violators.~~

Coordinates or conducts the research of case disposition statistics and other case-related information for special administrative reports and projects.

~~Assists prosecution compliance staff and attorneys in developing and preparing civil and criminal cases and criminal referrals; explains methods of air contaminant emission controls and may provide the South Coast AQMD recommendations concerning the extent of penalties to the court; with approval of management staff, may process cases which are to be dispositioned through civil compromise.~~

~~May act for the Investigations Manager in the absence of the incumbent.~~

MINIMUM REQUIREMENTS

Experience and Education:

EXPERIENCE: Two years of experience in the class of Investigator, or three years of civil and/or criminal investigative experience with a public law enforcement agency, or two years of experience conducting a variety of journey-level commercial and industrial air pollution control inspections.

-AND-

EDUCATION: Completion of at least 34 semester (51 quarter) units of core courses from an accredited college or university, preferably in an academic discipline related to the assigned office/division area of specialization.

SUBSTITUTION: Graduation from an accredited college or university with a bachelor's degree, preferably with a major in an academic discipline related to the assigned office/division area of specialization; may substitute for six months of the required experience.

KNOWLEDGE OF: Principles of supervision, training and performance appraisal; principles and practices of investigative techniques; principles, practices and methods of research, review and preparation of civil and criminal cases; recordkeeping systems and equipment; the principal sources of information required to support criminal prosecution; functions of judicial agencies; filing and courtroom procedures; principles of effective interviewing methods and techniques; oral and written communication methods and techniques required to obtain from and provide information to uncooperative individuals.

ABILITY TO: Supervise, organize, and review the work of professional, technical, and clerical personnel; assign and coordinate the work of staff engaged in the revision, preparation, and processing of civil and criminal cases; lead staff in the application of rules, regulations, statutes, and guidelines; analyze and interpret case-related information and complex problems; develop alternatives and recommend effective courses of action; review field inspection reports; identify and compile documentation required to prepare and verify case elements and support criminal prosecution; apply established guidelines to case elements and South Coast AQMD policy and procedures to violators and/or counsel in order to reach an

agreed settlement; prepare clear and comprehensive reports; establish and maintain cooperative relations with a variety of South Coast AQMD personnel, attorneys, and public and private agency officials.

ATTACHMENT C

Amendments to Section 53 of the Salary Resolution and Appendices A and B of the MOU between South Coast AQMD and Teamsters Local 911

Title [Position numbers]	Current Bi-Weekly Salary Range	Proposed Bi-Weekly Salary Range
Deputy Board Clerk II (revising, Deputy Clerk/Transcriber) [0163, 0163,0169]	\$1,920.33 - \$2,599.63	\$2073.95 - \$2,807.60
Senior Deputy Board Clerk (revising, Senior Deputy Clerk) [0162]	\$2,106.35 - \$2,850.88	\$2,274.86 - \$3,078.96
Paralegal [1403, 1019]	\$2,465.72 - \$3,337.91	\$3,088.50 - \$4,179.63
Senior Paralegal [0940]	\$2,678.55 - \$3,625.94	\$3,286.82 - \$4,449.20
Supervising Air Quality Inspector [130, 0406, 0481, 0453, 0526, 0733, 0915, 0550, 0500, 0499, 1088 ,0405, 1192, 1169 ,0428, 0498, 0549, 1687]	\$3,214.26 - \$4,351.42	\$3,286.82 - \$4,449.20

ATTACHMENT D

Amendments to FY 2023-24 Budget

DIVISION	ADD	DELETE
General Counsel	1 – Contracts Assistant	
General Counsel	1 – Senior Paralegal	
General Counsel		2 – Investigators (ID #1233, #1234)

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BOARD MEETING DATE: September 1, 2023

AGENDA NO. 15

PROPOSAL: Appropriate Funds and Amend Contract with Strumwasser & Woocher, LLP to Provide Representation and Advice to South Coast AQMD Hearing Board

SYNOPSIS: In December 2022, the Board authorized \$125,000 for the law firm of Strumwasser & Woocher, LLP to provide legal representation and advice to the Hearing Board on a litigation matter. A contract in an amount not to exceed \$125,000 was executed in January 2023. This action is to appropriate an additional \$300,000 for specialized legal counsel and services as requested by the South Coast AQMD Hearing Board, from the General Fund Undesignated (Unassigned) Fund Balance to the Clerk of the Boards' FY 2023-24 Budget, Services and Supplies Major Object, Professional and Special Services Account, and amend the contract with Strumwasser & Woocher, LLP to add funds in an amount not to exceed \$300,000 for specialized legal counsel and services in a litigation matter.

COMMITTEE: Administrative, August 11, 2023; Recommended for Approval

RECOMMENDED ACTIONS:

1. Appropriate a total of \$300,000 from the General Fund Undesignated (Unassigned) Fund Balance to be used in FY 2023-24 Clerk of the Boards' Budget, Services and Supplies Major Object, Professional and Special Services Account; and
2. Authorize the Chair to amend the contract with Strumwasser & Woocher, LLP to provide specialized legal counsel and services to the South Coast AQMD Hearing Board.

Wayne Natri
Executive Officer

Background

In December 2022, the Board authorized a contract with Strumwasser & Woocher, LLP in an amount not to exceed \$125,000 for specialized legal counsel and services as required by the South Coast AQMD Hearing Board, through September 30, 2023.

In August 2023, a no cost contract modification was authorized to extend the contract term to December 30, 2023.

Proposal

The Hearing Board is requesting an additional \$300,000 for Strumwasser & Woocher for legal representation on a matter involving the Hearing Board. It is necessary to increase available funds for the Hearing Board to ensure outside legal representation is available to the Hearing Board when the need arises.

Resource Impacts

Sufficient funds are available from the General Fund Undesignated (Unassigned) Fund Balance in the FY 2023-24 Budget upon approval of this Board letter. This action will bring the total amount for this contract for outside counsel costs approved by the Board to \$425,000.

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BOARD MEETING DATE: September 1, 2023

AGENDA NO. 16

PROPOSAL: Approve Contract Awards as Approved by MSRC

SYNOPSIS: As part of their FYs 2021-24 Work Program, the MSRC approved two awards under their Request for Information for Publicly Accessible Goods Movement Zero-Emission Infrastructure. At this time, the MSRC seeks Board approval of the contract awards as part of the 2021-24 Work Program.

COMMITTEE: Mobile Source Air Pollution Reduction Review Committee, August 17, 2023; Recommended for Approval

RECOMMENDED ACTIONS:

1. Approve two contract awards totaling \$14,679,171 under the Publicly Accessible Goods Movement Zero-Emission Infrastructure Request for Information (RFI) for electric vehicle support equipment (EVSE) and hydrogen refueling infrastructure, as part of approval of the MSRC FYs 2021-24 Work Program, as described in this letter and as follows:
 - a. A funding award to Prologis in an amount not to exceed \$11,679,171 to implement EVSE and hydrogen refueling at seven logistics facilities located within the geographical jurisdiction of the South Coast AQMD. South Coast AQMD will administer the Prologis project on behalf of the MSRC under the terms and conditions of the agreement executed between Prologis and South Coast AQMD on behalf of the MSRC. The MSRC will augment the partners' contribution as an element of the FYs 2021-24 Work Program;
 - b. A contract with the Los Angeles County Cleantech Incubator (LACI) in an amount not to exceed \$3,000,000 to implement zero-emission truck refueling at two locations at the Port of Los Angeles;
2. Authorize MSRC to adjust contract awards up to five percent, as necessary and previously granted in prior Work Programs; and

3. Authorize the Chair of the Board (or by the Board Chair's designation, the Executive Officer) to execute the contracts under the 2021-24 Work Programs, as described above and in this letter.

Larry McCallon
Chair, MSRC

AK:RG

Background

In September 1990, Assembly Bill 2766 was signed into law (Health & Safety Code Sections 44220-44247) authorizing 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 South Coast AQMD be placed into an account to be allocated pursuant to a work program developed and adopted by the MSRC and approved by the Board.

Proposals

At its August 17, 2023 meeting, the MSRC considered recommendations from its MSRC Technical Advisory Committee (MSRC-TAC) and approved the following:

FYs 2021-24 Publicly Accessible Goods Movement Zero-Emission Infrastructure Program

In August 2022, the MSRC approved an RFI for Publicly Accessible Goods Movement Zero-Emission Infrastructure. The RFI, with an initial targeted funding amount of \$50,000,000 with the purpose of identifying potential partners to assist the MSRC in deploying publicly accessible EVSE and hydrogen infrastructure within the South Coast AQMD region. The RFI closing date was November 30, 2022. Based on information submitted in response to the RFI, the MSRC is allowed, to select one or more RFI respondents to enter into discussions and enter into agreements with RFI respondents.

As part of the approval of the FYs 2021-24 Work Program, the MSRC approved the following two initial RFI awards totaling \$14,679,171:

- a. An award to Prologis in an amount not to exceed \$11,679,171. An RFI Information Package was received from Prologis seeking MSRC funding to implement direct current fast charging and hydrogen refueling at seven Prologis facilities located within the South Coast AQMD geographic jurisdiction. These seven Zero Emission Refueling Hubs will support, and accelerate, the transition to battery electric and fuel cell heavy-duty trucks that dray containers from the San Pedro Bay Ports to Prologis logistics facilities located throughout the South Coast AQMD region. The MSRC funding award is one element of the overall project funding. South Coast AQMD was awarded funding from the California State Transportation Agency (CalSTA) to support the Prologis project in the amount of \$38,930,570. Additionally, Prologis has committed \$155,722,278 towards the project, for a total project cost of \$206,332,019. To contract and administer this project, the MSRC approved that an

amount not to exceed \$11,679,171 to augment the partners' contribution as an element of the FYs 2021-24 Work Program. This will allow for more effective and efficient project administration, as there will be a single contact between South Coast AQMD and Prologis, as opposed to two separate contracts – one for the CalSTA funding, and a second for the MSRC funding. As recommended by the MSRC, South Coast AQMD will administer the Prologis project on behalf of the MSRC under the terms and conditions of the agreement executed between Prologis and South Coast AQMD on behalf of the MSRC; and

- b. An award to the Los Angeles Cleantech Incubator (LACI) in an amount not to exceed \$3,000,000. An Information Package was received from LACI seeking MSRC funding to implement zero-emission battery electric drayage truck recharging on property located at Port of Los Angeles. In addition to submitting an Information Package to the MSRC, LACI requested federal funding to support this project. LACI was successful in receiving \$1,500,000 in federal funding to co-fund the transition of two Port sites into publicly accessible battery electric drayage truck charging facilities. The City of Los Angeles Harbor Department has informed the MSRC of their support for the project.

At this time, the MSRC requests the Board approve the contract awards as part of approval of the 2021-24 AB 2766 Discretionary Fund Work Program as outlined above. 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.

Outreach

In accordance with South Coast AQMD's Procurement Policy and Procedure, public notices advertising the Publicly Accessible Goods Movement Zero-Emission Infrastructure RFI was published in the Los Angeles Times, the Orange County Register, the San Bernardino Sun, and Riverside County's Press Enterprise to leverage the most cost-effective method of outreach to the South Coast Basin. In addition, the RFI was advertised in the Desert Sun newspaper for expanded outreach in the Coachella Valley. Additionally, potential respondents may have been notified utilizing South Coast AQMD's own electronic listing of certified minority vendors. Notice of the RFI was emailed to the diverse spectrum of Legislative Caucuses and chambers of commerce and business associations and placed on South Coast AQMD's website (<http://www.agmd.gov>), where it could be viewed by making the selection "Grants and Bids." Further, the RFI 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.

Resource Impacts

South Coast AQMD 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 will be drawn from this fund.

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BOARD MEETING DATE: September 1, 2023

AGENDA NO. 17

REPORT: Legislative, Public Affairs and Media Report

SYNOPSIS: This report highlights the July 2023 outreach activities of the Legislative, Public Affairs and Media Office, which includes Major Events, Community Events/Public Meetings, Environmental Justice Update, Speakers Bureau/Visitor Services, Communications Center, Public Information Center, Small Business Assistance, Media Relations, and Outreach to Community Groups and Federal, State and Local Governments.

COMMITTEE: No Committee Review

RECOMMENDED ACTION:
Receive and file.

Wayne Nastri
Executive Officer

DA:LT:AL:DS:ar:lb:bel

BACKGROUND

This report summarizes the activities of the Legislative, Public Affairs and Media Office for July. The report includes Major Events, Community Events/Public Meetings, Environmental Justice Update, Speakers Bureau/Visitor Services, Communications Center, Public Information Center, Small Business Assistance, Media Relations, and Outreach to Community Groups and Governments.

MAJOR EVENTS (HOSTED AND SPONSORED)

Each year, staff engage in hosting and sponsoring several major events throughout South Coast AQMD's four-county jurisdiction to promote, educate, and provide important information to the public regarding reducing air pollution, protecting public health, and improving air quality while minimizing economic impacts.

There were no major events hosted nor sponsored in July.

COMMUNITY EVENTS/PUBLIC MEETINGS

Staff engaged with residents and stakeholders of diverse communities to provide information about the agency, incentive programs, and ways individuals can help reduce air pollution through events and meetings sponsored by South Coast AQMD or in partnership with others. Attendees typically receive information regarding the following:

- Tips on reducing their exposure to smog and its negative health effects;
- How to file a complaint;
- Clean air technologies and their deployment;
- Invitations to or notices of conferences, seminars, workshops, and other public events;
- South Coast AQMD incentive programs;
- Funding/grant opportunities by South Coast AQMD and partner agencies;
- Ways to participate in South Coast AQMD's rules and policy development; and
- Assistance in resolving air pollution-related problems.

Staff attended and/or provided information and updates at the following July events and meetings:

South Bay Cities Council of Governments

On July 6, staff attended the South Bay Cities Council of Governments Steering Committee meeting to announce the upcoming Proposed Amended Rule 1180 (Refinery Community and Fenceline Air Monitoring) and Proposed Rule 1180.1 (Other Refinery Fenceline and Community Air Monitoring) Working Group on July 11.

Orange County Business Council

On July 7, staff participated in Orange County Business Council Governmental Affairs Committee meeting to provide information on the Voucher Incentive Program (VIP) and mobile apps.

53rd Assembly District Summer Open House

On July 8, staff participated in the Summer Open House for Assembly District 53. Staff demonstrated a clean air vehicle and provided information on the Commercial Electric Lawn & Garden (eL&G) Equipment Incentive & Exchange Program.

South Pasadena Chamber of Commerce

On July 12, staff attended South Pasadena Chamber of Commerce's Legislative Affairs Committee meeting to provide program updates on Replace Your Ride, eL&G, VIP, and wildfire air quality tips.

Upland Chamber of Commerce

On July 13, staff attended Upland Chamber of Commerce Governmental Affairs Committee meeting to provide information on eL&G and other programs.

Western Riverside Council of Governments

On July 19, staff participated in a virtual meeting with Western Riverside Council of Governments to share information on Carl Moyer, Replace Your Ride, and eL&G.

Harbor Association of Industry and Commerce

On July 20, staff participated in Harbor Association of Industry and Commerce's Government Affairs Committee meeting. Updates were shared on South Coast AQMD's recent CalSTA award for zero-emission projects in the San Pedro Bay Ports corridor.

Department of Toxic Substances Control Open House

On July 20, staff participated in the Department of Toxic Substances Control Open House related to Ecobat, formerly known as Quemetco, in the City of Industry. Information was shared with attendees on how to file a complaint by phone, web, and/or mobile apps.

ENVIRONMENTAL JUSTICE UPDATE

The following are key environmental justice (EJ) related activities in which staff participated during July. These events and meetings involve communities affected disproportionately from adverse air quality impacts.

U.S. EPA Office of Research and Development Webinar

On July 11, staff participated in U.S. EPA's ORD webinar, "Available Tools to Advance Our Understanding of Cumulative Impacts" to learn about publicly available tools and analytical methods to measure cumulative impacts.

CalEPA EJ Action Grants Workshop

On July 12, staff participated in CalEPA's second virtual public listening session regarding draft guidelines for the EJ Action Grants program.

U.S. EPA's National EJ Community Engagement Call

On July 18, staff participated in U.S. EPA's National EJ Community Engagement call on outreach, health equity and public participation, and updates on civil rights issues.

Office of Management and Budget Webinar

On July 20, staff participated in Office of Management and Budget (OMB) webinar on broadening public participation in federal government actions. OMB shared information on efforts to develop expanded federal public participation tools and guidance.

U.S. EPA's Community Environmental Justice Mapping Tool & Training

On July 26, staff participated in U.S. EPA's training webinar on the Community EJMapping Tool & EJSCREEN 2.2.

SPEAKERS BUREAU/VISITOR SERVICES

South Coast AQMD 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. South Coast AQMD also hosts visitors from around the world who meet with staff on a wide range of air quality issues.

There were no presentations in July.

COMMUNICATION CENTER STATISTICS

The Communication Center handles calls on South Coast AQMD’s main line, 1-800-CUT-SMOG®, the Spanish line, and after-hours calls to those lines. Total calls received in the month of July are summarized below:

Calls to South Coast AQMD’s Main Line and 1-800-CUT-SMOG®	1,917
Calls to South Coast AQMD’s Spanish Line	26
Total Calls	1,943

PUBLIC INFORMATION CENTER STATISTICS

The Public Information Center (PIC) handles phone calls and assists individuals who walk in for general information. Email advisories provided information on upcoming meetings and events, program announcements and alerts on time-sensitive issues. Information for the month of July is summarized below:

Calls Received by PIC	36
Calls to Automated System	243
Total Calls	279
Visitor Transactions	137
Email Advisories Sent	36,951

SMALL BUSINESS ASSISTANCE

South Coast AQMD notifies local businesses of proposed regulations so they can participate in the agency’s rule development process. South Coast AQMD works with other agencies and governments to identify efficient, cost-effective ways to reduce air pollution and shares that information broadly. Staff provided personalized assistance to small businesses over the telephone, at South Coast AQMD headquarters and via virtual on-site consultation, as summarized below for July.

- Provided permit application assistance to 119 companies, and
- Processed 41 Air Quality Permit Checklists.

Types of businesses assisted:

Auto Body Shops	Gas Stations	Telecommunication
Construction Firms	Manufacturing Facilities	Centers
Dry Cleaners	Restaurants	Warehouses
Engineering Firms	Retail Facilities	

MEDIA RELATIONS

The Media Office handles all South Coast AQMD outreach and communications with television, radio, newspapers and all other publications, and media operations. The July report is listed below:

Major Media Interactions	255
Press Releases	26
News Carousel	1

Major Media Topics:

- **Southern California Air Quality:** Staff participated in an interview with the Los Angeles Times on Southern California air quality following the cooler weather in May and June.
- **KLM Data:** CBS2/KCAL requested data to use for the wildfire season. Response sent to reporter.
- **Fireworks Advisory:** Radio Korea had questions regarding the 4th of July advisory. The press release was sent. Staff participated in an interview with KNX, KTLA and KESQ regarding the 4th of July Holiday particulate advisory.
- **July 4 Aftermath:** Staff participated in interviews with Air Talk, KNX, KTLA, ABC, KVCR Radio, and Los Angeles Times on air quality effects from July 4 fireworks. Written responses were sent to The New York Times.
- **Wildfires and AQ:** Staff participated in an interview with NBC4 and KPCC on the wildfires and air quality.
- **Heatwave:** Staff participated an interview with Los Angeles Times on why air quality is worse during a heatwave.
- **Ozone Advisory:** Staff participated in an interview with KCRW on the ozone advisory.
- **Air Quality Centers:** Staff participated in an interview with KESQ on the air quality monitor in Palm Springs, and the air quality in the Coachella Valley.
- **Salton Sea:** A freelance journalist submitted follow up questions on agricultural dust PM2.5 and PM10 emissions in Coachella. Response sent to journalist.
- **Smog Reduction Progress:** Los Angeles Times inquired about the progress of reducing smog in Los Angeles County for the spring and summer. Response sent to journalist.

- **AQ Alert Days:** NBC requested information on the number of code red days in New York in May/June compared to this time during previous years. Referred reporter to the New York Air Quality agency.
- **Rendering Plants:** LAist inquired about rendering plants in Vernon, if Coast Packing Co. is exempt from posting a 1-800-CUT-SMOG sign by its entrance, and why rendering plants that only conduct edible rendering are not subject to Rule 415. Response sent to reporter and reporter followed up with a fact check.
- **Air Monitor at Los Angeles International Airport (LAX):** Los Angeles Times inquired about the air monitor at the LAX Tom Bradley International Terminal. Response sent to reporter.
- **AB 617 Funding in Salton Sea:** Freelance science journalist inquired about the most up-to-date funding for the three AB 617 communities around Salton Sea. Journalist was directed to submit a request for information.
- **Marathon Refinery:** Reuters inquired about the Marathon Refinery. Response sent to Reuters.
- **Tesla application:** Staff participated in an interview with Bloomberg on South Coast AQMD's application for Tesla chargers and whether recordings are posted for the Special Governing Board meetings, Mobile Source Air Pollution Reduction Review Committee (MSRC), and MSRC Technical Advisory Committee meetings.
- **Rule 1158:** Undark Magazine requested information on Rule 1158 requirements. Response was provided. A follow-up inquiry was received. Response was provided.
- **Air Quality Index (AQI) Map:** ABC7 producer expressed interest in use of South Coast AQMD's air quality monitoring system and the real-time AQI map. Information was sent to producer.
- **Particulate, Smoke, Ozone and Windblown Advisories:** Pitched advisories to local outlets resulting in media coverage.
- **IQAir/Red Cross Event:** Pitched media event on air purifiers to local outlets. ABC7, NBC4/Telemundo, KNX, Univision, and Spectrum all covered the event and conducted interviews.
- **Press Releases:** Pitched press releases for Hyperion, Sterigenics, and the Fuel Cell Train Funding to local media outlets resulting in media coverage.

News Releases:

- **South Coast AQMD Issues Particulate Advisory due to July 4th Fireworks – July 3, 2023 (English and Spanish):** Informed residents of poor air quality due to fireworks.

- **South Coast AQMD Awarded \$76 Million for a First-of-its-Kind Zero-Emission Fuel Cell Train and Infrastructure that will Transform Goods Movement in San Pedro Bay Port Corridor – July 6, 2023 (English and Spanish)** – Informed residents about a grant awarded to South Coast AQMD for zero-emission projects.
- **South Coast AQMD Issues Ozone Advisory Due to Heat Wave – July 13, 2023 (English and Spanish):** Informed residents of hazardous ozone levels due to heat.
- **South Coast AQMD Issues Smoke Advisories Due to Moreno Valley Fire – July 14-16, 2023 (English and Spanish):** Informed residents of smoke advisory due to fires.
- **South Coast AQMD, IQAir & the American Red Cross to Receive Air Purifiers for Creation of Wildfire Clean Air Centers – July 17, 2023 (English and Spanish):** Informed citizens about delivery of 183 air purifiers to South Coast AQMD, IQAir, and Red Cross, which are used to strengthen the network of clean air centers for wildfires.
- **South Coast AQMD Extends Ozone Advisory as Heat Wave Continues - July 18, 2023 (English and Spanish):** Informed residents of extended ozone advisory due to continued heat wave.
- **South Coast AQMD Issues Windblown Dust Advisory Due to High Winds in the Coachella Valley – July 23, 2023 (English and Spanish):** Informed the public of a PM10 Dust Advisory caused by high winds in the Coachella Valley.
- **South Coast AQMD Issues Violation to Hyperion Treatment Plant for Elevated Levels of Hydrogen Sulfide – July 26, 2023 (English and Spanish):** Informed public of an NOV issued due to elevated levels of Hydrogen Sulfide.
- **South Coast AQMD Issues Violation to Sterigenics Medical Sterilization Facility in Ontario, California – July 28, 2023 (English and Spanish):** Informed public of a NOV issued due to modifying an air pollution control system without first obtaining a required permit to operate.
- **South Coast AQMD Smoke Advisory Due to Wildfire in Eastern Riverside County – July 28, and 31, 2023 (English and Spanish):** Informed the public of The Bonny Fire.
- **South Coast AQMD Issues Windblown Dust Advisory Due to High Winds in the Coachella Valley – July 31 (English and Spanish):** Informed the public of the winds from thunderstorms in the Imperial Valley and Coachella Valley have caused Hazardous particle pollution levels throughout the Coachella Valley and the San Geronio Pass area.

Social Media Posts:

- [Ozone Advisory \(6/30\)](#): 8,077 Twitter Impressions
--RT by @LAFDtalk, @AirResources, @KESQHaley, @SBCountyPH, @cd1losangeles, @NWSSanDiego, @805Weather, @AIRNow

- [Fireworks Particulate Advisory \(7/3\)](#): 12,219 Twitter Impressions
--RT by @ReadyLA, @JustADayinLA, @LAFDtalk, @bellgardenscity, @SenGonzalez33, @CountyofLA, @ourSantaMonica, @AirResources, @ReadyLACounty
- [AQ Forecast \(7/6\)](#): 2,802 Twitter Impressions
--RT by @WeAre4CleanAir, @ReadyLA, @OurSantaMonica, @AIRNow, @ReadyLACounty
- [Reche / Rabbit / Highland Fire Smoke Advisory \(7/14\)](#): 10,375 Twitter Impressions
--RT by @805Weather, @NWSSanDiego, @RSO, @RivCoReady, @CityofMoVal
- [Rabbit/Reche Fire Smoke Advisory Update \(7/15\)](#): 14,101 Twitter Impressions
--RT by @OurSantaMonica, @NWSLosAngeles, @805Weather, @CaliforniaEPA, @CityofMoVal, @NWSSanDiego
- [Clean Air Centers \(7/19\)](#): 2,466 Twitter Impressions
--RT by @AirResources

News Carousel:

- **Apply now for the medical member position on the Hearing Board** – Linked to Current Job Opportunities page.

OUTREACH TO COMMUNITY GROUPS AND FEDERAL, STATE AND LOCAL GOVERNMENTS

Communication was conducted in July with elected officials and/or staff from the following state and federal offices:

- | | |
|--|-------------------------------------|
| • U.S. Senator Dianne Feinstein | • Senator Aisha Wahab |
| • U.S. Senator Alex Padilla | • Senator Scott Wiener |
| • U.S. Representative Nanette Barragán | • Assemblymember Philip Chen |
| • U.S. Representative Tony Cárdenas | • Assemblymember Diane Dixon |
| • U.S. Representative Judy Chu | • Assemblymember Laurie Davies |
| • U.S. Representative Young Kim | • Assemblymember Mike Fong |
| • Senator Catherine Blakespear | • Assemblymember Mike Gipson |
| • Senator Rosilicie Ochoa Bogh | • Assemblymember Chris Holden |
| • Senator Lena Gonzalez | • Assemblymember Josh Lowenthal |
| • Senator Brian Jones | • Assemblymember Al Muratsuchi |
| • Senator Dave Min | • Assemblymember Blanca Pacheco |
| • Senator Josh Newman | • Assemblymember Sharon Quirk-Silva |
| • Senator Anthony Portantino | • Assemblymember Rick Chavez Zbur |

Outreach was conducted personally and virtually in July to communicate with elected officials or staff from the following cities:

Agoura Hills	Fontana	Manhattan Beach
Alhambra	Fountain Valley	Malibu
Aliso Viejo	Gardena	Maywood
Arcadia	Garden Grove	Menifee
Artesia	Glendale	Mission Viejo
Avalon	Glendora	Monrovia
Azusa	Hawaiian Gardens	Montclair
Baldwin Park	Hawthorne	Montebello
Banning	Hemet	Monterey Park
Beaumont	Hermosa Beach	Moreno Valley
Bell	Hidden Hills	Murrieta
Bell Gardens	Highland	Newport Beach
Bellflower	Huntington Beach	Norco
Big Bear Lake	Huntington Park	Norwalk
Bradbury	Industry	Ontario
Brea	Inglewood	Orange
Buena Park	Irvine	Palm Desert
Burbank	Irwindale	Paramount
Calabasas	Jurupa Valley	Pasadena
Calimesa	Laguna Beach	Perris
Canyon Lake	Laguna Hills	Pico Rivera
Carson	Laguna Niguel	Pomona
Cerritos	Laguna Woods	Rancho Cucamonga
ChinoClaremont	La Cañada Flintridge	Rancho Palos Verdes
Colton	Lake Forest	Ranco Santa Margarita
Commerce	La Habra Heights	Redlands
Compton	La Mirada	Redondo Beach
Corona	La Palma	Riverside
Costa Mesa	La Puente	Rolling Hills
Covina	La Verne	Rolling Hills Estates
Cudahy	Lake Elsinore	Rosemead
Culver City	Lakewood	San Bernardino
Dana Point	Lawndale	San Clemente
Diamond Bar	Loma Linda	San Dimas
Downey	Lomita	San Fernando
Duarte	Los Alamitos	San Gabriel
Eastvale	Long Beach	San Jacinto
El Monte	Los Angeles	San Juan Capistrano
El Segundo	Lynwood	San Marino

Santa Ana	South El Monte	Vernon
Santa Clarita	South Gate	Villa Park
San Fernando	South Pasadena	Walnut
Santa Clarita	Stanton	West Covina
Santa Fe Springs	Temecula	West Hollywood
Santa Monica	Temple City	Westminster
Seal Beach	Torrance	Wildomar
Sierra Madre	Tustin	Whittier
Signal Hill	Upland	Yucaipa

Staff represented South Coast AQMD in July and/or provided updates or a presentation to the following governmental agencies and business organizations:

Bear Lake Valley Chamber of Commerce
 Bear Valley Electric Service
 Big Bear Municipal Water District
 California Department of Forestry and Fire Protection
 California Department of Insurance
 California Realtors Association
 Carson Chamber of Commerce
 Chino Basin Water Conservation District
 Chino Valley Chamber of Commerce
 Department of Toxic Substances Control
 Gardena Valley Chamber of Commerce
 Harbor Association of Industry and Commerce
 Inland Action
 Inland Empire Resource Conservation District
 Kaiser Permanente
 LA Sanitation & Environment
 Lomita Chamber of Commerce
 Los Angeles Area Chamber of Commerce
 Los Angeles County Department of Public Health
 Manhattan Beach Chamber of Commerce
 Metropolitan Water District of Southern California
 Moreno Valley Utility
 NAIOP, Inland Empire Chapter
 Orange County Business Council
 Palos Verdes Peninsula Chamber of Commerce
 Port of Long Beach
 Port of Los Angeles
 Rancho Cucamonga Municipal Utility
 Redondo Beach Chamber of Commerce

Riverside Public Utilities
San Bernardino International Airport Authority
San Bernardino County Fire Protection District
San Bernardino County Transportation Authority
San Gabriel Valley Economic Partnership
San Pedro Chamber of Commerce
SCAG
South Bay Cities Council of Governments
South Pasadena Chamber of Commerce
South Pasadena Chamber of Commerce
Torrance Area Chamber of Commerce
Upland Chamber of Commerce
Upper San Gabriel Valley Municipal Water District
U.S. Department of Agriculture, Forest Service
Valley Industry and Commerce Association

In July, staff represented South Coast AQMD and/or provided updates or a presentation to the following community and educational groups and organizations:

Breathe Southern California
California State University, Dominguez Hills
California State University, San Bernardino
Chaffey College
Clean Air Coalition of North Whittier & Avocado Heights
Clean Power Alliance of Southern California
Coalition for Clean Air
Del Amo Action Committee
Discovery Cube, Los Angeles
Grades of Green
Inland Empire Fire Safe Alliance
Living Desert Zoo and Gardens
Mt. San Antonio College
Palos Verdes Peninsula Land Conservancy
Pasadena City College
South Bay Parkland Conservancy
Southern California Mountains Foundation
Tree People
University of California, Los Angeles
University of California, Riverside
University of Redlands
Upland Unified School District
Wildlands Conservancy

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BOARD MEETING DATE: September 1, 2023

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, 2023.

COMMITTEE: No Committee Review

RECOMMENDED ACTION:
Receive and file.

Cynthia Verdugo-Peralta
Hearing Board Chair

ft

Attached are the following three summaries: **June and July 2023 Hearing Board Cases, and Rules From Which Variances and Orders for Abatement Were Requested in 2023**. An index of South Coast AQMD Rules is also attached.

There were no appeals filed during the period of June 1 to July 31, 2023.

Report of June 2023 Hearing Board Cases

Case Name and Case No. (South Coast AQMD Attorney)	Rules	Reason for Petition/Hearing	South Coast AQMD Position/Hearing Board Action	Type and Length of Variance or Order	Excess Emissions
1. Ameresco Chiquita Energy LLC Case No. 6143-3 (K. Roberts)	203(b) 1150.1 1303(b)(1) 1301(b)(2) 3002(c)(1)	Relief sought from rules and permit conditions due to increased NMOC in landfill gas. Time for source test needed.	Not Opposed/Granted	IV granted commencing 6/15/23 and continuing for 90 days or until the RV hearing scheduled for 7/20/23, whichever comes first.	NMOC: 105 lbs/day
2. County of San Bernardino – Fleet Management Case No. 6070-10 (Consent Calendar)	203(b)	Emergency generators expected to exceed annual 200-hour operating limit due to power outage resulting from an unforeseen vehicle accident.	Not Opposed/Granted	RV granted commencing 6/1/23 and continuing through 12/31/23, the FCD.	CO: 0.19 lb/hr. NOx: 0.51 lb/hr. PM10: 0.03 lb/hr. RHC: 0.03 lb/hr. Sox: 0.001 lb/hr.
3. Equilon Enterprises, LLC Shell Oil Products U.S. Case No. 4982-134 (K. Manwaring)	203(b) 3002(c)(1)	Bladder Tank replacement needed. Modification of Title V needed for portable unit.	Not Opposed/Granted	SV granted commencing 7/17/23 and continuing through 10/14/23.	None
4. Estrella Media, Inc Case No. 6235-1 (M. Reichert)	203(b)	Due to unforeseen loss of power, Diesel ICE deployed to maintain community emergency broadcasting.	Not Opposed/Granted	RV granted commencing 6/14/23 and continuing through 12/31/23, the FCD.	NOx: 12 g/BHP-hr. CO: 8.5 g/BHP-hr. PM: 0.38 g/BHP-hr.

Case Name and Case No. (South Coast AQMD Attorney)	Rules	Reason for Petition/Hearing	South Coast AQMD Position/Hearing Board Action	Type and Length of Variance or Order	Excess Emissions
5. Los Angeles Department of Water and Power, Haynes Generating Station Case No. 1263-76 (Consent Calendar)	203(b) 218(b)(2) 218.1(b)(4)(c) 2004(f)(1) 3002(c)(1)	Due to delayed repairs of Haynes #15 unit, additional time needed for installation, reassembly and testing.	Not Opposed/Granted	MFCD/EXT granted commencing 7/1/23 and continuing through 9/30/23, the FCD.	None
6. Los Angeles Department of Water and Power, Haynes Generating Station Case No. 1263-78 (Consent Calendar)	203(b) 218(b)(2) 218.1(b)(4)(c) 2004(f)(1) 3002(c)(1)	Due to Supercore catastrophic failure and both spare replacements damaged, time for additional repairs needed.	Not Opposed/Granted	RV granted commencing 7/1/23 and continuing through 6/30/24, the FCD.	None
7. South Coast AQMD vs. City of Fontana Case No. 5704-2 (Consent Calendar)	1196	Respondent is operating 9 non-compliant Heavy-Duty vehicles. Replacements will be purchased, or leased and/or Technical Feasibility Certificate	Stipulated/Modified	Mod. O/A granted commencing 6/21/23 and continuing through 7/31/27. The Hearing Board shall retain jurisdiction over this matter until 7/31/27.	N/A

Case Name and Case No. (South Coast AQMD Attorney)	Rules	Reason for Petition/Hearing	South Coast AQMD Position/Hearing Board Action	Type and Length of Variance or Order	Excess Emissions
8. South Coast AQMD vs. Los Angeles City, Sanitation Bureau, Hyperion Treatment Plant Case No. 1212-39 (E. Chavez & M. Reichert)	3002(c)(1)	Respondent requested modifications to the Order to address compliance concerns with flares.	Stipulated/Modified	Mod. O/A issued commencing 6/1/23. The Hearing Board shall retain jurisdiction over this matter until and including 30 days after FCD achieved.	N/A
9. South Coast AQMD vs. Los Angeles City, Sanitation Bureau, Hyperion Treatment Plant Case No. 1212-40 (E. Chavez & R. Mansell)	402	Inability to contain sewage odors and inability to conduct operations at wastewater treatment plant without being in violation of rule.	Stipulated/Modified	Mod. O/A issued 6/20/23 and continued to 1/31/24. The Hearing Board shall retain jurisdiction over this matter until 1/31/24.	N/A
10. Verizon Wireless -Magic Mountain Peak Case No. 6063-2 (E. Chavez)	203(b)	ICE deployed due to severe weather conditions and unforeseen loss of power from Southern California Edison (SCE). Petitioner exceeded additional time needed for limit of 200 hours.	Not Opposed/Granted	RV granted commencing 6/14/23 and continuing through 12/31/23, the FCD.	NOx: 25.68 lbs/day CO: 5.76 lbs/day VOC: 2.4 lbs/day

Case Name and Case No. (South Coast AQMD Attorney)	Rules	Reason for Petition/Hearing	South Coast AQMD Position/Hearing Board Action	Type and Length of Variance or Order	Excess Emissions
11. Verizon Wireless -San Sevaine Case No. 6139-5 (E. Chavez)	203(b)	ICE deployed due to severe weather conditions and unforeseen loss of power from SCE. Petitioner exceeded additional time needed for limit of 200 hours.	Not Opposed/Granted	RV granted commencing 6/14/23 and continuing through 12/31/23, the FCD.	NOx: 10.47 lbs/day CO: 13.96 lbs/day VOC: 10.47 lbs/day
12. Verizon Wireless – Santiago Peak Case No. 6139-6	203(b)	Emergency power began operating nonstop due to an unforeseen accident that resulted in loss of commercial power. Relief sought due to the potential to exceed 200 hours of operation before IV can be requested.	Not Opposed/Granted	Ex Parte EV granted commencing 6/6/23 and continuing for 30 days or until the RV hearing scheduled for 7/20/23, whichever comes first.	NOx: 5.95 lbs/day CO: 7.93 lbs/day VOC: 5.95 lbs/day

Acronyms

CO: Carbon Monoxide

EXT: Extension

FCD: Final Compliance Date

g/BHP-hr: grams per brake horsepower-hour

IV: Interim Variance

MFCD: Modification Final Compliance Date

Mod: Modification

N/A: Not Applicable

NMOC: Non-Methane Organic Compounds

NOx: Oxides of Nitrogen

O/A – Order for Abatement

PM: Particulate Matter

RV: Regular Variance

SV: Short Variance

VOC: Volatile Organic Compound

Report of July 2023 Hearing Board Cases

Case Name and Case No. (South Coast AQMD Attorney)	Rules	Reason for Petition/Hearing	South Coast AQMD Position/Hearing Board Action	Type and Length of Variance or Order	Excess Emissions
1. California Steel Industries, Inc. Case No. 4624-23 (E. Chavez)	203(b) 1146(c)(1) 1146(e)(1) 2004(f)(1) 3002(c)(1)	Sought relief to operate its #2 Boiler while implementing solutions to achieve standards for boiler operation.	Not Opposed/Granted	RV granted commencing 7/6/23 and continuing through 12/29/23, the FCD.	NOx: 1.40 lbs./day
2. Fuel Zone, Inc Case No. 6238-1 (K. Roberts)	203(b)	Approval of administrative change was needed and submitted to increase maximum allowable throughput.	Opposed/Denied	RV denied	N/A
3. South Coast AQMD vs. Flexfirm Holdings LLC Case No. 6239-1 (M. Reichert)	203(b) 402 1128 1147 H&S §41700	Numerous nuisance odor complaints resulted in Notices of Violation. Source tests not done since 2018.	Stipulated/Issued	O/A issued commencing 7/25/23 and continuing through 5/31/24.	N/A
4. South Coast AQMD vs. Fuel Zone, Inc. Case No. 6238-2 (K. Roberts & J. Jones)	203(b)	Limiting throughput, recording daily and monthly throughput reports and locking two dispensers.	Stipulated/Issued	O/A issued commencing 7/27/23 and continuing through 1/31/24. The Hearing Board shall retain jurisdiction over this matter until 1/31/24 or until a modified permit to operate is issued, whichever occurs first.	N/A

Case Name and Case No. (South Coast AQMD Attorney)	Rules	Reason for Petition/Hearing	South Coast AQMD Position/Hearing Board Action	Type and Length of Variance or Order	Excess Emissions
5. South Coast AQMD vs. Los Angeles County, Metropolitan Transportation Authority (MTA) Case No. 5874-2 (Consent Calendar)	1196(d)(1)	Operation of non-compliant heavy duty vehicles, More time needed to issue bid request and procure compliant vehicles.	Stipulated/Modified	Mod. O/A issued commencing 7/27/23 and continuing through 7/31/26.	N/A
6. South Coast AQMD vs. Southern California Edison (SCE), Pebbly Beach Generating Station Case No. 1262-115 (M. Reichert)	1470(c)(4)(A)	Both parties agreed to allow Unit 15 to operate due to lowest emissions possible even though it cannot meet NOx and CO limits.	Stipulated/Modified	Mod. O/A issued commencing 7/25/23 and continuing through 3/31/26.	N/A

Acronyms

- CO: Carbon Monoxide
- FCD: Final Compliance Date
- Mod: Modification
- N/A: Not Applicable
- NOx: Oxides of Nitrogen
- O/A: Order for Abatement
- RV: Regular Variance

Rules from which Variances and Orders for Abatement were Requested in 2023

Rules	Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Total Actions
203(b)	2	7	16	4	7	9	4						49
218(b)(2)			1			2							3
218.1(b)(4)(C)			1			2							3
402	1					1	1						3
415(f)				1									1
415(g)				1									1
431.1(c)(2)					3								3
431.1(f)(1)(A)					2								2
461(e)(2)(A)(i)				1									1
463(c)(2)(B)		1											1
464(b)(1)(A)					1								1
464(b)(2)					1								1
464(b)(3)					1								1
1100(e)(2)(A)	1	2											3
1100(e)(2)(B)			2										2
1100(e)(3)(A)			1										1
1110.2		1											1
1128							1						1
1146(c)(1)			1				1						2
1146(c)(1)(I)			1										1
1146(c)(1)(J)	1	2											3
1146(e)(1)			2				1						3
1147							1						1
1150.1						1							1
1176(e)(1)					1								1
1176(e)(2)					1								1
1178(d)(3)(D)		1											1
1196					1								1
1196(d)(1)						1	1						2
1303(b)(1)						1							1
1302(b)(2)						1							1
1470(c)(4)(A)	1						1						2
2004(f)(1)		4	3	1	1	2	1						12
2012(d)(2)		1											1
3002(c)(1)		5	3	1	4	5	1						19
CA H&S Code 41700							1						1

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BOARD MEETING DATE: September 1, 2023

AGENDA NO. 19

REPORT: Civil Filings and Civil Penalties Report

SYNOPSIS: This report summarizes monthly penalties and legal actions filed by the General Counsel’s office from June 1 through July 31, 2023. An Index of South Coast AQMD Rules is attached with the penalty report.

COMMITTEE: Stationary Source, August 18, 2023, Reviewed

RECOMMENDED ACTION:
Receive and file.

Bayron T. Gilchrist
General Counsel

BTG:cr

<u>Civil Filings</u>	<u>Violations</u>
1. Northgate Indio, LLC County of Riverside Superior Court – Palm Springs Case No.: CVPS2303482; Filed 7.20.23 (ND) NOV No. P70167 R. 461 - Gasoline Transfer and Dispensing for Mobile Fueling Operations California Health and Safety Code §§ 42402 and 42402.1	1 1 Violation

Attachments

June and July 2023 Penalty Reports

Index of South Coast AQMD Rules and Regulations

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

Settlement Penalty Report (06/01/2023 - 06/30/2023)

Total Penalties

Civil Settlement: \$390,183.00
Hearing Board Settlement: \$2,000.00
MSPAP Settlement: \$26,956.00
No Burn Day: \$150.00
Total Cash Settlements: \$419,289.00

Fiscal Year through 06/30/2023 Cash Total: \$6,299,893.62

Fac ID	Company Name	Rule Number	Settled Date	Init	Notice Nbrs	Total Settlement
Civil						
191040	365 DISPOSAL & RECYCLING	201, 203, 403, 1110.2, 1133, 1133.1, 1403	06/28/2023	KER	P67537, P67538, P67539, P67540, P67541, P67542, P67543, P67544, P67545, P67546, P67547, P67548, P67549, P67550, P67640, P69221, P69224, P69225, P69230, P69231, P74319, P74320, P74344, P74345, P74346, P74350, P74751, P74752, P74851, P74852, P74853, P74854, P74855, P74856, P74857, P74858, P74859, P74860, P74861, P74862, P74863, P74864	\$119,496.00
21593	COAST PLATING, INC.	201,203, 430, 1469, 1469.1	06/20/2023	SH	P69801, P69807, P69808, P69824, P69837, P73501	\$7,500.00
191728	DONGHAO LI	1403, 403	06/13/2023	RM	P69460, P70290, P70292, P70294, P70296	\$24,122.00
192589	HYE PRECISION	444, H&S 25205.5	06/15/2023	KER	P59489	\$2,928.00
129253	J & ED'S AUTOBODY	203, 1151	06/15/2023	SP	P65595	\$1,000.00
800312	LA CO HARBOR-UCLA MEDICAL CENTER	3002	06/29/2023	DH	P73804, P73874	\$1,500.00
171107	PHILLIPS 66 CO/LA REFINERY WILMINGTON PL	1118, 3002	06/06/2023	ND	P67767, P67768	\$83,461.50
132368	QG PRINTING II, LLC	3002	06/15/2023	JL	P68712, P68746	\$9,819.00
182980	SIGNAL HILL PETROLEUM, INC.	203, 463, 1173	06/21/2023	JJ	P66842, P73253, P73269, P73351	\$36,886.50
187885	SMITHFIELD PACKAGED MEATS, CORP.	2004, 3002	06/16/2023	KCM	P74627	\$1,800.00
51475	SO CAL EDISON CO	218, 218.1, 2004, 3001, 3002	06/20/2023	SH	P63899, P66174, P67116, P67119, P69538, P69912, P73928, P74109	\$50,000.00

Fac ID	Company Name	Rule Number	Settled Date	Init	Notice Nbrs	Total Settlement
174704	TESORO LOGISTICS-EAST HYNES TERMINAL	462, 463, 1142, 1149, 1178, 3002	06/27/2023	EC	P65135, P66515, P66517, P67704, P67910, P67922, P67923, P68209, P73201, P74054, P74504	\$9,500.00
174655	TESORO REFINING & MARKETING CO., LLC	221, 463, 1114, 1118, 1173, 1178, 1189, 3002	06/15/2023	KCM	P65123, P65618, P68967, P74056	\$12,500.00
181667	TORRANCE REFINING COMPANY, LLC	1173, 3002	06/07/2023	DH	P67959	\$1,750.00
181667	TORRANCE REFINING COMPANY, LLC	2004, 3002	06/23/2023	DH	P67956	\$23,420.00
172272	VAN NUYS COURTHOUSE EAST-JCC/AOC	201, 203, 222	06/15/2023	SH	P66835, P68869	\$4,500.00

Total Civil Settlements: \$390,183.00

Hearing Board

112573	FREUND BAKING COMPANY	1153.1	06/21/2023	JL	6226-1	\$2,000.00
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Total Hearing Board Settlements: \$2,000.00

MSPAP

192822	FELIX RAMOS	1403	06/14/2023	GV	P74214	\$4,261.00
159019	LA CANADA SHELL	461	06/23/2023	CL	P66041	\$1,424.00
162741	MICHAEL'S SHELL, KSM ENTERPRISES, INC.	461	06/16/2023	VA	P78676	\$1,344.00
136913	MORRELL'S ELECTRO PLATING, INC	1469	06/16/2023	VA	P69849	\$995.00
129249	MULTICHROME / MICROPLATE CO., INC.	1469	06/16/2023	CL	P74756	\$1,456.00
180338	PACIFIC AVIATION DEVELOPMENT, LLC	201, 203, 461	06/23/2023	CL	P62788	\$3,162.00
137050	PERFORMANCE CONSTRUCTION & PAINTING	40 CFR 61.145, 1403	06/23/2023	CL	P76108	\$2,218.00
171391	PRECISION HERMETIC TECHNOLOGY, INC.	203	06/23/2023	CL	P77601	\$1,171.00
160807	PRIMO POWDER COATING & SANDBLASTING	109, 203, 1151	06/16/2023	CL	P78551	\$4,855.00
1334	SOC-CO PLASTIC COATING CO.	3002	06/16/2023	VA	P63996	\$995.00
52742	STOROPACK, INC.	1146.1, 3002	06/09/2023	GV	P75304	\$793.00
28381	UPLAND CITY OF FLEET MAINTENANCE DIV	203, 461	06/13/2023	GV	P73167	\$1,882.00
63128	WEI CHUAN U.S.A., INC.	1415.1	06/23/2023	VA	P74914	\$1,021.00
193472	WIDE CORP-SAM COHEN	40 CFR 61.145, 1403	06/21/2023	GV	P74417	\$1,379.00

Total MSPAP Settlements: \$26,956.00

No-Burn Day

888888	Resident, Laguna Niguel	445	6/27/2023	JJ	2031491	\$50.00
888888	Resident, San Bernardino	445	6/27/2023	JJ	2030615	\$50.00
888888	Resident, Long Beach	445	6/27/2023	JJ	2030163	\$50.00

Total No-Burn Day Settlements: \$150.00

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

Settlement Penalty Report (07/01/2023 - 07/31/2023)

Total Penalties

Civil Settlement: \$539,956.00
Hearing Board Settlement: \$2,000.00
MSPAP Settlement: \$53,015.00
Total Cash Settlements: \$594,971.00

Fiscal Year through 07/31/2023 Cash Total: \$594,971.00

Fac ID	Company Name	Rule Number	Settled	Init	Notice Nbrs	Total Settlement
Civil						
183078	ANTHEM OIL POMONA	461, H&S 41960.2	07/14/2023	ND	P69628, P69633, P69641, P70744	\$7,250.00
137362	BHL INDUSTRIES	221, 403, 1166	07/19/2023	EC	P73403, P74310, P74312	\$3,300.00
157152	BOWERMAN POWER LFG, LLC	1110.2, 3002, 42402	07/19/2023	MR	P63080, P63090, P65511, P65525, P65543, P74707, P74721	\$453,645.00
190051	BRIDGE POINT LONG BEACH, LLC	221, 403, 1166, 2004	07/07/2023	EC	P73402, P74309, P74311, P74615	\$12,300.00
83102	LIGHT METALS, INC.	402, 2004, 2012, 2012 Appendix A, 3002, H&S 41700	07/20/2023	MR	P63461, P63690, P63774, P65861, P66855, P66871, P66890, P68358, P68359, P68360, P68361, P68362, P68364, P68365, P68372	\$21,000.00
141750	NRC ENVIRONMENTAL SERVICES, INC.	403, 1466	07/05/2023	RM	P70278, P70279, P70280	\$6,000.00
190100	OCEAN DEVELOPMENT, INC.	1403	07/05/2023	RM	P67500, P69730, P69731, P69737, P69738, P74230, P74231	\$3,400.00
149027	WARREN E & P, INC.	203, 463	07/13/2023	KER	P74507, P74510, P75660	\$25,761.00
162523	WOOD KOTE PRODUCTS, INC.	314	07/19/2023	SP	P65660, P66976	\$6,000.00
192992	ZAKIR HUSEIN MALEK	1403	07/19/2023	ND	P74220, P74221	\$1,300.00
Total Civil Settlements :						\$539,956.00

Fac ID	Company Name	Rule Number	Settled	Init	Notice Nbrs	Total Settlement
Hearing Board						
112573	FREUND BAKING COMPANY	1153.1	07/19/2023	JL	6226-1	\$2,000.00
Total Hearing Board Settlements : \$2,000.00						

MSPAP						
25087	AAA PLATING & INSPECTION, INC.	203, 1469	07/07/2023	VA	P77858	\$2,635.00
181770	ALISO CREEK SHELL	461	07/07/2023	CL	P78760	\$1,455.00
115618	BEAR OIL COMPANY, LLC.	461	07/14/2023	VA	P73118	\$1,493.00
153145	EBMI ENTERPRISES, INC.	203, 461	07/14/2023	CL	P78751	\$2,552.00
144474	GARNER ENGINEERING INC	203	07/07/2023	VA	P73272	\$937.00
11245	HOAG HOSPITAL	3002	07/07/2023	CL	P63994	\$921.00
168885	K & A FUELS, INC.	461	07/07/2023	CL	P66044	\$1,821.00
163720	LA BREA SINCLAIR	203, 461	07/07/2023	CL	P75711	\$1,445.00
194161	MOSES KARMI	1403	07/14/2023	CL	P74435	\$1,942.00
182690	NEW CINGULAR WIRELESS PCS, LLC	203, 1470	07/07/2023	CL	P75972	\$971.00
194573	PULTE HOMES	403	07/14/2023	VA	P74183	\$6,558.00
194573	PULTE HOMES	403	07/14/2023	VA	P75221	\$4,684.00
183670	RADC ENTERPRISES, INC.	203, 461	07/21/2023	CL	P77708	\$1,456.00
176677	SUKUT CONSTRUCTION, LLC	403	07/14/2023	VA	P63480	\$3,747.00
87470	TARGET STORES, NO. 291	203	07/21/2023	CL	P77906	\$1,021.00
82245	THREE D SERVICE	403	07/14/2023	CL	P75231	\$1,942.00
193927	TRENT A. JOHN	1403	07/21/2023	VA	P74431	\$4,396.00
136112	U.S. GAS	461	07/07/2023	CL	P78754	\$1,446.00
107668	WEBB'S CHEVRON/WEBB'S AUTO & TRUCK	203, 461	07/07/2023	CL	P74828	\$1,756.00
199102	WILSHIRE CONSTRUCTION, LP.	402, 403	07/07/2023	CL	P76538, P76545	\$9,837.00
Total MSPAP Settlements : \$53,015.00						

SOUTH COAST AQMD'S RULES AND REGULATIONS INDEX
JUNE AND JULY 2023 PENALTY REPORTS

REGULATION I - GENERAL PROVISIONS

Rule 109 Recordkeeping for Volatile Organic Compound Emissions

REGULATION II - PERMITS

Rule 201 Permit to Construct

Rule 203 Permit to Operate

Rule 218 Continuous Emission Monitoring

Rule 221 Plans

Rule 222 Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II.

REGULATION III - FEES

Rule 314 Fees for Architectural Coatings

REGULATION IV - PROHIBITIONS

Rule 402 Nuisance

Rule 403 Fugitive Dust (*Pertains to solid particulate matter emitted from man-made activities.*)

Rule 430 Breakdown Provisions

Rule 444 Open Fires

Rule 445 Wood Burning Devices

Rule 461 Gasoline Transfer and Dispensing

Rule 462 Organic Liquid Loading

Rule 463 Storage of Organic Liquids

REGULATION VIII - ORDERS FOR ABATEMENT

Rule 817 Effective Date of Decision

REGULATION XI - SOURCE SPECIFIC STANDARDS

Rule 1110.2 Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines

Rule 1114 Petroleum Refinery Coking Operations (MCS-01)

Rule 1118 Emissions from Refinery Flares

Rule 1133 Composting and Related Operations – General Administrative Requirements

Rule 1133.1 Chipping and Grinding Activities

Rule 1142 Marine Tank Vessel Operations

Rule 1146.1 Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters

SOUTH COAST AQMD'S RULES AND REGULATIONS INDEX
JUNE AND JULY 2023 PENALTY REPORTS

Rule 1149	Storage Tank Degassing
Rule 1151	Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations
Rule 1153.1	Emissions of Oxides of Nitrogen from Commercial Food Ovens
Rule 1166	Volatile Organic Compound Emissions from Decontamination of Soil
Rule 1173	Fugitive Emissions of Volatile Organic Compounds
Rule 1178	Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities
Rule 1189	Emissions from Hydrogen Plant Process Vents

REGULATION XIV - TOXICS

Rule 1403	Asbestos Emissions from Demolition/Renovation Activities
Rule 1415.1	Reduction of Refrigerant Emissions from Stationary Refrigeration Systems
Rule 1469	Hexavalent Chromium Emissions from Chrome Plating and Chromic Acid Anodizing Operations
Rule 1469.1.	Spraying Operations Using Coatings Containing Chromium

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

REGULATION XXX- TITLE V PERMITS

Rule 3001	Applicability
Rule 3002	Requirements

CODE OF FEDERAL REGULATIONS

40 CFR 61.145	Standard for Demolition and Renovation
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CALIFORNIA HEALTH AND SAFETY CODE

25205.5	Hazardous Waste Fees - Facilities and Generator Fees
41960.2	Gasoline Vapor Recovery
42402	Violation of Emission Limitations – Civil Penalty

[↑ Back to Agenda](#)

BOARD MEETING DATE: September 1, 2023

AGENDA NO. 20

REPORT: Intergovernmental Review of Environmental Documents and CEQA Lead Agency Projects

SYNOPSIS: This report provides a listing of environmental documents prepared by other public agencies seeking review by South Coast AQMD between July 1, 2023 and July 31, 2023, and proposed projects for which South Coast AQMD is acting as lead agency pursuant to CEQA.

COMMITTEE: Mobile Source, August 18, 2023, Reviewed

RECOMMENDED ACTION:
Receive and file.

Wayne Natri
Executive Officer

SR:MK:MM:BR:SW:ET

Background

The California Environmental Quality Act (CEQA) Statute and Guidelines require public agencies, when acting in their lead agency role, to provide an opportunity for other public agencies and members of the public to review and comment on the analysis in environmental documents prepared for proposed projects. A lead agency is when a public agency has the greatest responsibility for supervising or approving a proposed project and is responsible for the preparation of the appropriate CEQA document.

Each month, South Coast AQMD receives environmental documents, which include CEQA documents, for proposed projects that could adversely affect air quality. South Coast AQMD fulfills its intergovernmental review responsibilities, in a manner that is consistent with the Board's 1997 Environmental Justice Guiding Principles and Environmental Justice Initiative #4, by reviewing and commenting on the adequacy of the air quality analysis in the environmental documents prepared by other lead agencies.

The status of these intergovernmental review activities is provided in this report in two sections: 1) Attachment A lists all of the environmental documents prepared by other public agencies seeking review by South Coast AQMD that were received during the reporting period; and 2) Attachment B lists the active projects for which South Coast AQMD has reviewed or is continuing to conduct a review of the environmental documents prepared by other public agencies. Further, as required by the Board's October 2002 Environmental Justice Program Enhancements for fiscal year (FY) 2002-03, each attachment includes notes for proposed projects which indicate when South Coast AQMD has been contacted regarding potential air quality-related environmental justice concerns. The attachments also identify for each proposed project, as applicable: 1) the dates of the public comment period and the public hearing date; 2) whether staff provided written comments to a lead agency and the location where the comment letter may be accessed on South Coast AQMD's website; and 3) whether staff testified at a hearing.

In addition, the South Coast AQMD will act as lead agency for a proposed project and prepare a CEQA document when: 1) air permits are needed; 2) potentially significant adverse impacts have been identified; and 3) the South Coast AQMD has primary discretionary authority over the approvals. Attachment C lists the proposed air permit projects for which South Coast AQMD is lead agency under CEQA.

Attachment A – Log of Environmental Documents Prepared by Other Public Agencies and Status of Review, and Attachment B – Log of Active Projects with Continued Review of Environmental Documents Prepared by Other Public Agencies

Attachment A contains a list of all environmental documents prepared by other public agencies seeking review by South Coast AQMD that were received pursuant to CEQA or other regulatory requirements. Attachment B provides a list of active projects, which were identified in previous months' reports, and which South Coast AQMD staff is continuing to evaluate or prepare comments relative to the environmental documents prepared by other public agencies. The following table provides statistics on the status of review¹ of environmental documents for the current reporting period for Attachments A and B combined²:

¹ The status of review reflects the date when this Board Letter was prepared. Therefore, Attachments A and B may not reflect the most recent updates.

² Copies of all comment letters sent to the lead agencies are available on South Coast AQMD's website at: <http://www.aqmd.gov/home/regulations/ceqa/commenting-agency>.

Statistics for Reporting Period from July 1, 2023 to July 31, 2023	
Attachment A: Environmental Documents Prepared By Other Public Agencies and Status of Review	40
Attachment B: Active Projects With Continued Review of Environmental Documents Prepared By Other Public Agencies (which were previously identified in the May 2023 and June 2023 reports)	18
Total Environmental Documents Listed in Attachments A & B	58
<i>Comment letters sent</i>	<i>19</i>
<i>Environmental documents reviewed, but no comments were made</i>	<i>28</i>
<i>Environmental documents currently undergoing review</i>	<i>11</i>

Staff focuses on reviewing and preparing comments on environmental documents prepared by other public agencies for proposed projects: 1) where South Coast AQMD is a responsible agency under CEQA (e.g., when air permits are required but another public agency is lead agency); 2) that may have significant adverse regional air quality impacts (e.g., special event centers, landfills, goods movement); 3) that may have localized or toxic air quality impacts (e.g., warehouse and distribution centers); 4) where environmental justice concerns have been raised; and 5) which a lead or responsible agency has specifically requested South Coast AQMD review.

If staff provided written comments to a lead agency, a hyperlink to the “South Coast AQMD Letter” is included in the “Project Description” column which corresponds to a notation in the “Comment Status” column. In addition, if staff testified at a hearing for a proposed project, a notation is also included in the “Comment Status” column. Copies of all comment letters sent to lead agencies are available on South Coast AQMD’s website at: <http://www.aqmd.gov/home/regulations/ceqa/commenting-agency>. Interested parties seeking information regarding the comment periods and scheduled public hearings for projects listed in Attachments A and B should contact the lead agencies for further details as these dates are occasionally modified.

In January 2006, the Board approved the Clean Port Initiative Workplan (Workplan). One action item of the Workplan 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 accordance with this action item, Attachments A and B organize the environmental documents received according to the following categories: 1) goods movement projects; 2) schools; 3) landfills and wastewater projects; 4) airports; and 5) general land use projects. In response to the action item relative to mitigation, staff maintains a compilation of mitigation measures presented as a series of tables relative to off-road engines; on-road engines; harbor craft; ocean-going vessels; locomotives; fugitive dust; and greenhouse gases which are available on South Coast AQMD’s website at:

<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>. Staff will continue compiling tables of mitigation measures for other emission sources such as ground support equipment.

Attachment C – Proposed Air Permit Projects For Which South Coast AQMD is CEQA Lead Agency

The CEQA lead agency is responsible for determining the type of environmental document to be prepared if a proposal requiring discretionary action is considered to be a “project” as defined by CEQA. South Coast AQMD periodically acts as lead agency for its air permit projects and the type of environmental document prepared may vary depending on the potential impacts. For example, an Environmental Impact Report (EIR) is prepared when there is substantial evidence that the project may have significant adverse effects on the environment. Similarly, a Negative Declaration (ND) or Mitigated Negative Declaration (MND) may be prepared if a proposed project will not generate significant adverse environmental impacts, or the impacts can be mitigated to less than significance. The ND and MND are types of CEQA documents which analyze the potential environmental impacts and describe the reasons why a significant adverse effect on the environment will not occur such that the preparation of an EIR is not required.

Attachment C of this report summarizes the proposed air permit projects for which South Coast AQMD is lead agency and is currently preparing or has prepared environmental documentation pursuant to CEQA. As noted in Attachment C, South Coast AQMD is lead agency for three air permit projects during July 2023.

Attachments

- A. Environmental Documents Prepared by Other Public Agencies and Status of Review
- B. Active Projects With Continued Review of Environmental Documents Prepared by Other Public Agencies
- C. Proposed Air Permit Projects For Which South Coast AQMD is CEQA Lead Agency

**ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
July 1, 2023 to July 31, 2023**

SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
Warehouse & Distribution Centers ORC230719-13 Amazon Parcel Delivery Facility Project	The project consists of demolition of a 637,503 square foot office building and construction of a 181,500 square foot warehouse on 31.52 acres. The project is located at 275 Valencia Avenue near the southwest corner of Valencia Avenue and East Birch Street. http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/august-2023/ORC230719-13.pdf Comment Period: 7/13/2023 - 8/11/2023 Public Hearing: 7/24/2023	Notice of Preparation	City of Brea	South Coast AQMD staff commented on 8/11/2023
Warehouse & Distribution Centers RVC230712-02# Mead Valley Commerce Center (PPT 220050, CZ 2200062, TPM 38601)	The project consists of construction of a 1,003,510 square foot warehouse on 44.74 acres and a park on 13.35 acres. The project is located near the southwest corner of Seaton Avenue and Cajalco Expressway in Perris. http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/july-2023/RVC230712-02.pdf Comment Period: 6/29/2023 - 7/28/2023 Public Hearing: 7/24/2023	Notice of Preparation	Riverside County	South Coast AQMD staff commented on 7/27/2023
Warehouse & Distribution Centers RVC230719-03 Temescal Valley Commerce Center	The project consists of construction of seven warehouse buildings totaling 637,718 square feet on 46.13 acres. The project is located on the southeast corner of Temescal Canyon Road and Dawson Canyon Road in the community of Temescal Valley. Reference RVC230201-02 and RVC211119-0 Comment Period: N/A Public Hearing: N/A	Other	County of Riverside	Document reviewed - No comments sent for this document received
Warehouse & Distribution Centers RVC230719-04# Mead Valley Commerce Center (PPT 220050, CZ 2200062, TPM 38601)	The project consists of a case transmittal for construction of a 1,003,510 square foot warehouse on 44.74 acres and a park on 13.35 acres. The project is located near the southwest corner of Seaton Avenue and Cajalco Expressway in Perris. Reference RVC230712-02 Comment Period: N/A Public Hearing: N/A	Other	County of Riverside	Document reviewed - No comments sent for this document received

*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
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
July 1, 2023 to July 31, 2023**

<u>SOUTH COAST AQMD LOG-IN NUMBER</u>	<u>PROJECT DESCRIPTION</u>	<u>TYPE OF DOC.</u>	<u>LEAD AGENCY</u>	<u>COMMENT STATUS</u>
PROJECT TITLE				
<i>Industrial and Commercial</i> LAC230705-02 Violet Street Creative Office Campus Project	The project consists of demolition of 57,618 square feet of existing structures and construction of 450,599 square foot of office building on 6.3 acres. The project is located on the northeast corner of Violet Street and Mateo Street in Central City North. Reference LAC211109-0 Comment Period: 6/29/2023 - 8/14/2023 Public Hearing: N/A	Draft Environmental Impact Report	City of Los Angeles	Document reviewed - No comments sent for this document received
<i>Industrial and Commercial</i> LAC230712-04 Development Plan Approval Case No. 1002	The project consists of construction of a 104,900 square foot industrial building. The project is located at 13711 Freeway Drive near the northeast corner of Spring Avenue and Freeway Drive. Comment Period: N/A Public Hearing: 7/10/2023	Other	City of Santa Fe Springs	Document reviewed - No comments sent for this document received
<i>Industrial and Commercial</i> SBC230719-05 Philadelphia Street Industrial Development Site and East End Annexation project (PL20-0003, PL20-0004, PL20-0005)	The project consists of annexation of 56.87 acres of land from unincorporated San Bernardino County and construction of three industrial building totaling 63,900 square feet on 3.95 acres. The project is located near the southwest corner of Francis Avenue and East End Avenue. Comment Period: 6/28/2023 - 7/18/2023 Public Hearing: 7/19/2023	Notice to Intent to Adopt Mitigated Negative Declaration	City of Chino	Document reviewed - No comments sent for this document received
<i>Waste and Water-related</i> LAC230705-05 Summer Ecobat Formerly Quemetco	The project consists of an update to Summer Ecobat, an existing hazardous waste facility formerly known as Quemetco. The project is located at 720 South Seventh Avenue near the northeast corner of South Seventh Avenue and Salt Lake Avenue in Industry. Reference LAC230606-03, LAC230418-08, LAC220621-11, LAC220301-09, LAC211001-05, LAC210907-04, LAC210907-03, LAC210427-09, LAC210223-04, LAC210114-07, LAC191115-02, and LAC180726-06 Comment Period: N/A Public Hearing: 7/20/2023	Other	Department of Toxic Substances Control	Document reviewed - No comments sent for this document 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
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
July 1, 2023 to July 31, 2023

SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Waste and Water-related</i> LAC230712-05 World Oil Terminals - Vernon	The project consists of renewal of an existing hazardous waste facility permit to increase volume per rail car to transfer and store hazardous waste. The project is located at 3650 East 26th Street on the southeast corner of East 26th Street and South Downey Road in Vernon. Reference LAC220414-06, LAC211109-10, LAC211019-02, LAC201110-09, LAC190919-04, and LAC180515-07 Comment Period: 7/1/2023- 8/17/2023 Public Hearing: N/A	Permit Renewal	Department of Toxic Substance Control	Under review, may submit written comments
<i>Waste and Water-related</i> LAC230719-15 Industrial Service Oil Company	The project consists of a Class 1 Permit Modification for an oil and hazardous waste recycling facility to include a modified closure plan and closure cost estimate for two tanks. The project is located at 1700 South Soto Street near the northeast corner of South Soto Street and East Washington Boulevard in Los Angeles within the designated AB 617 East Los Angeles, Boyle Heights, West Commerce community. Reference LAC230221-09 Comment Period: N/A Public Hearing: N/A	Permit Modification	Department of Toxic Substances Control	Under review, may submit written comments
<i>Waste and Water-related</i> LAC230726-02 Former Athens Tank Farm Site, Willowbrook	The project consists of an update to cleanup volatile organic compounds in the groundwater underlying the 122-acre former Athens Tank Farm. The project is located on the northwest corner of South Central Avenue and El Segundo Boulevard in Willowbrook within the designated AB 617 South Los Angeles community. Reference LAC170412-01 and LAC130328-03 Comment Period: N/A Public Hearing: N/A	Other	Department of Toxic Substances Control	Document reviewed - No comments sent for this document received
<i>Waste and Water-related</i> LAC230726-03 Spane Park Stormwater Capture Project	The project consists of construction of a stormwater capture and filtration facility and other ancillary park improvements. The project is located near southeast corner of Rosecrans Avenue and Gundry Avenue. Comment Period: 7/21/2023- 8/9/2023 Public Hearing: 8/22/2023	Notice of Intent to Adopt Mitigated Negative Declaration	City of Paramount	Document reviewed - No comments sent for this document 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
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
July 1, 2023 to July 31, 2023

SOUTH COAST AQMD LOG-IN NUMBER	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
PROJECT TITLE				
<i>Waste and Water-related</i> RVC230705-04 Meridian Storm Drain Extension Project	The project consists of construction of an underground 6-foot by 4-foot reinforced concrete box (RCB) from an existing RCB, extending 2,350 linear feet south and connecting to existing reinforced concrete pipe (RCP). The project is located near the southwest corner of the Interstate 215 and Van Buren Boulevard. Comment Period: 6/28/2023 - 7/30/2023 Public Hearing: 9/13/2023	Notice of Intent to Adopt Mitigated Negative Declaration	March Joint Powers Authority	Document reviewed - No comments sent for this document received
<i>Transportation</i> ORC230719-14 I-5/El Toro Road Interchange Project	The project consists of modification of Interstate 5 (I-5) and El Toro Road Interchange (PM 17.8/19.7) to improve traffic flow, optimize traffic signalization, and reduce freeway ramp queuing. The project is located within the cities of Lake Forest, Laguna Woods, and Laguna Hills. Comment Period: 7/11/2023 - 8/25/2023 Public Hearing: 7/26/2023	Notice of Preparation	California Department of Transportation	Under review, may submit written comments
<i>Institutional (schools, government, etc.)</i> LAC230719-07 School Upgrade Program (SUP)	The project consists of major modernizations, upgrades, and reconfigurations to school campuses in the Los Angeles Unified School District (LAUSD) under Measure RR that was passed in 2020 to address significant and unfunded needs of Los Angeles public school facilities. The project encompasses 710 square miles and is bounded by Burbank to the north, 710 freeway to the east, San Pedro to the south, and the Pacific Ocean to the west. The project includes four designated AB 617 communities: 1) East Los Angeles, Boyle Heights, West Commerce, 2) Southeast Los Angeles, 3) South Los Angeles, and 4) Wilmington, Carson, West Long Beach. Comment Period: 7/5/2023 - 8/19/2023 Public Hearing: N/A	Draft Subsequent Program Environmental Impact Report	Los Angeles Unified School District	Document reviewed - No comments sent for this document received
<i>Institutional (schools, government, etc.)</i> LAC230719-12 Sunset Canyon Recreation Replacement Building Project	The project consists of demolition of seven buildings totaling 6,982 square feet and construction of a 11,500 square foot student-oriented, multi-purpose building on 0.86 acre. The project is located at 111 Easton Drive, near the northwest corner of Easton Drive and De Neve Drive in Los Angeles. Reference: LAC170829-01, LAC170824-04, and LAC170505-07 Comment Period: 7/17/2023 - 8/16/2023 Public Hearing: 8/1/2023	Notice of Preparation	University of California, Los Angeles	Document reviewed - No comments sent for this document 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
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
July 1, 2023 to July 31, 2023

SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Institutional (schools, government, etc.)</i> ORC230719-06 Patrick Henry Elementary School Reconstruction Project	The project consists of demolition of 50,335 square feet building space and reconstruction of 119,139 square feet building space for educational use. The project is located at 1123 West Romneya Drive in Anaheim. Comment Period: 7/17/2023 - 8/15/2023 Public Hearing: N/A	Notice to Intent to Adopt Mitigated Negative Declaration	Anaheim Elementary School District	Document reviewed - No comments sent for this document received
<i>Institutional (schools, government, etc.)</i> ORC230719-08 Los Alamitos High School Gymnasium Project	The project consists of construction of a 32,000 square foot gymnasium on a 1.4 acres portion of the 50-acres Los Alamitos High School campus. The project is located at 3591 West Cerritos Avenue in Los Alamitos near the northeast corner of East Spring Street and Norwalk Boulevard in Los Alamitos. Comment Period: 7/13/2023 - 8/1/2023 Public Hearing: 8/22/2023	Notice to Intent to Adopt Mitigated Negative Declaration	Los Alamitos Unified School District	Document reviewed - No comments sent for this document received
<i>Institutional (schools, government, etc.)</i> RVC230712-01 Calvary Chapel CUP2023-0074	The project consists of construction of three buildings totaling 23,700 square feet on 4.75 acres. The project is located at 1780 Orchard Heights Avenue near the southeast corner of Brookside Avenue and Orchard Heights Avenue. Comment Period: 7/11/2023 - 7/26/2023 Public Hearing: 7/27/2023	Site Plan	City of Beaumont	Document reviewed - No comments sent for this document received
<i>Institutional (schools, government, etc.)</i> RVC230712-10 The KC-46A Main Operating Base 5 (MOB 5) Beddown at Grissom ARB, Indiana, March ARB, California or Tinker AFB, Oklahoma	The project consists of relocation and operation of military aircraft (KC-46A tanker aircraft), personnel, and infrastructure on March Air Reserve Base. The project is located near the southeast corner of Cactus Avenue and Heacock Street in Riverside. Reference RVC221201-05 Comment Period: 7/12/2023 - 8/14/2023 Public Hearing: 7/18/2023	Draft Environmental Impact Statement	Department of Defense, Department of Air Force	Under review, may submit written comments

- 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
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
July 1, 2023 to July 31, 2023

SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Retail</i> LAC230712-07 Avid Hotel Project	The project consists of construction of a 30,200 square foot hotel on 0.84 acre. The project is located near the northeast corner of North Azusa Avenue and Glentana Street. <div style="text-align: center;"> Comment Period: 7/6/2023- 8/7/2023 Public Hearing: N/A </div>	Notice of Intent to Adopt Mitigated Negative Declaration	City of Covina	Document reviewed - No comments sent for this document received
<i>Retail</i> RVC230719-02 Tentative Parcel Map No. 38695 / Conditional Use Permit No. 230014	The project consists of subdivision of one parcel into eleven parcels ranging from 1.18 to 1.97 acres and construction of a commercial center on 19.42 acres. The project is located at the southeast corner of Auld Road and Pourroy Road in Murrieta. <div style="text-align: center;"> Comment Period: N/A Public Hearing: N/A </div>	Other	Riverside County	Document reviewed - No comments sent for this document received
<i>General Land Use (residential, etc.)</i> LAC230705-01 District NoHo Project	The project consists of construction of 1,527 residential units totaling 1,523,528 square feet, 105,125 square feet of retail uses, and 580,374 square feet of office space on 16 acres. The project is located near the southeast corner of Burbank Boulevard and Lankershim Avenue in North Hollywood. Reference LAC220407-03 <div style="text-align: center;"> Comment Period: N/A Public Hearing: 7/26/2023 </div>	Final Environmental Impact Report	City of Los Angeles	Document reviewed - No comments sent for this document received
<i>General Land Use (residential, etc.)</i> LAC230719-11 Paseo Marina Project (ENV-2016-3343-EIR)	The project consists of demolition of three buildings totaling 100,781 square feet and proposes two options on 6.06 acres: A) Construction of 658 residential units and 27,300 square feet for commercial uses. B) Construction of 425 residential units, 90,000 square feet for office uses, and 40,000 square feet for commercial uses. The project is located on the southwest corner of Maxella Avenue and Glencoe Avenue. Reference LAC190307-06, LAC170627-03, LAC170614-05 <div style="text-align: center;"> Comment Period: 7/13/2023 - 8/28/2023 Public Hearing: N/A </div>	Recirculated Draft Environmental Impact Report	City of Los Angeles	Document reviewed - No comments sent for this document 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
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
July 1, 2023 to July 31, 2023

SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
General Land Use (residential, etc.) ORC230712-06 Related Bristol Specific Plan Project	The project consists of redevelopment of 465,063 square feet commercial buildings on 41.13 acres to 3,750 residential units, 350,000 square feet of commercial uses, retail uses, elder care uses, and park uses. The project is located near the southwest corner of MacArthur Boulevard and Bristol Street. Reference ORC210810-08, ORC200806-02 and ORC200303-03 Comment Period: 7/6/2023- 8/21/2023 Public Hearing: N/A	Supplemental Environmental Impact Report	City of Santa Ana	Document reviewed - No comments sent for this document received
General Land Use (residential, etc.) ORC230726-05 7101 Lincoln Avenue, Workforce Housing Project	The project consists of demolition of a commercial building and construction of 55 residential units on 1.35 acres. The project is located near south of Rosecrans Avenue and east of Gundry Avenue. Comment Period: 7/19/2023- 8/7/2023 Public Hearing: N/A	Notice of Intent to Adopt Mitigated Negative Declaration	City of Buena Park	Document reviewed - No comments sent for this document received
General Land Use (residential, etc.) RVC230712-03 Thermal Ranch Specific Plan No. SP00401	The project consists of a General Plan Amendment and Change of Zone of 619.1 acres for future construction of 1,362 residential units on 223.1 acres, 150,000 square feet of retail use, 75,000 square feet of recreational use, and 10,000 square feet of office use. The project is bounded by Avenue 62 to the north, Tyler Street to the east, Harrison Street to the west, and Avenue 64 to the south within the designated AB 617 Eastern Coachella Valley community. Comment Period: 5/26/2023- 6/27/2023 Public Hearing: 6/19/2023	Notice of Preparation	Riverside County	Document reviewed - No comments sent for this document received
General Land Use (residential, etc.) RVC230719-01 Specific Plan Amendment 21-05249, and Development Plan Review 21-00014	The project consists of rezoning land use from commercial zone to residential zone and construction of 300 residential units on 14.68 acres. The project is located at the southwest corner of Rider Street and Evans Road. Comment Period: 7/14/2023- 8/14/2023 Public Hearing: N/A	Notice of Intent to Adopt Mitigated Negative Declaration	City of Perris	Document reviewed - No comments sent for this document 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
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
July 1, 2023 to July 31, 2023

SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>General Land Use (residential, etc.)</i> RVC230719-09 DEV2022-002 Tentative Tract Map No. 38346 (PLN22-0003), Plot Plan No. PLN22-0004	The project consists of construction of 162 residential units on 9.5 acres. The project is located on the northwest corner of Rouse Road and Meniffee Road. Reference RVC220125-02 Comment Period: 7/14/2023 - 8/2/2023 Public Hearing: 8/9/2023	Notice of Intent to Adopt Mitigated Negative Declaration	City of Meniffee	Document reviewed - No comments sent for this document received
<i>General Land Use (residential, etc.)</i> SBC230712-09 City of Fontana Downtown Core Project	The project consists of construction of 10,920 residential units and 3,992,868 square feet of commercial uses on 478 acres. The project is bounded by Foothill Boulevard to the north, Mango Avenue to the east, and Randall Avenue to the south, and Juniper Avenue to the west. Reference SBC230516-05, SBC221206-02 Comment Period: N/A Public Hearing: N/A	Final Environmental Impact Report	City of Fontana	Document reviewed - No comments sent for this document received
<i>General Land Use (residential, etc.)</i> SBC230719-10 PSPA21-005, Subarea 29 Specific Plan Amendment Project	The project consists of construction of 1,470 residential units on 151.1 acres. The project is located on the southeast corner of Eucalyptus Avenue and Haven Avenue. Reference SBC211202-02 Comment Period: 7/17/2023 - 8/31/2023 Public Hearing: N/A	Draft Environmental Impact Report	City of Ontario	Under review, may submit written comments
<i>Plans and Regulations</i> LAC230726-04 Cornfield Arroyo Seco Specific Plan	The project consists of updates to new land use and zoning regulations, incentives, and boundaries for the future construction of residential units on 600 acres. The project is bounded by Cypress Park to the north, Lincoln Heights to the east, Main Street to the south, and Chinatown to the west. Reference LAC210420-02 Comment Period: 7/20/2023 - 9/18/2023 Public Hearing: N/A	Draft Environmental Impact Report	City of Los Angeles	Under review, may submit written comments

- 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
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
July 1, 2023 to July 31, 2023

SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Plans and Regulations</i> LAC230726-06 South Pasadena General Plan and Downtown Specific Plan Update, and 2021-2029 Housing Element	The project consists of updates to the City's General Plan Housing Element to demonstrate there is sufficient capacity to construct 2,775 residential units on 2,272 acres of planning area. The project is bounded by Pasadena to the north, San Marino to the east, Alhambra to the south, and Los Angeles to the southwest within the designated AB 617 East Los Angeles, Boyle Heights, West Commerce community. Reference LAC210422-01 and LAC180202-01 Comment Period: 7/24/2023 - 9/6/2023 Public Hearing: 8/8/2023	Draft Program Environmental Impact Report	City of South Pasadena	Under review, may submit written comments
<i>Plans and Regulations</i> ORC230705-06 City of Newport Beach Housing Implementation Program	The project consists of the City's 2021-2029 Housing Element plan to establish programs, policies, and actions for future construction of all income housing in six areas of Newport Beach: Airport Area, West Newport Mesa, Dover-Westcliff, Newport Center, Coyote Canyon, and Banning Ranch. The project is bounded by Interstate 405 to the North, State Route 73 to east, and the Pacific Ocean to the south and west. http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/july-2023/ORC230705-06.pdf Comment Period: 6/27/2023 - 7/27/2023 Public Hearing: 7/10/2023	Notice of Preparation	City of Newport Beach	South Coast AQMD staff commented on 7/26/2023
<i>Plans and Regulations</i> ORC230719-16 General Plan Housing Element Update	The project consists of revisions to the City's Housing Element Plan (2021-2029) which includes policies and programs to facilitate construction, rehabilitation, and preservation of housing for all economic segments of the community. The project encompasses 18.03 square miles and is bounded by Lake Forest to the north, Rancho Santa Margarita and Las Flores to the east, San Juan Capistrano to the south, and Laguna Hills to the west. Comment Period: 6/1/2023 - 6/27/2023 Public Hearing: 6/12/2023	Other	City of Mission Viejo	Document reviewed - No comments sent for this document received
<i>Plans and Regulations</i> RVC230726-01 Highway 74 Community Plan (GPA No. 1205) and Zone Consistency Program	The project consists of modifications to existing land use designations and policies for future construction of residential units, commercial, retail, light industrial, business park, public facilities, rural, open space, and recreational uses on 2,220 acres. The project is located in Riverside County between City of Perris and Lake Elsinore along a 6.8-mile segment of Highway 74. Reference RVC190515-01 Comment Period: 7/26/2023 - 8/2/2023 Public Hearing: 8/2/2023	Final Environmental Impact Report	Riverside County Planning Department	Document reviewed - No comments sent for this document 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 B*
ACTIVE PROJECTS WITH CONTINUED REVIEW OF ENVIRONMENTAL DOCUMENTS
PREPARED BY OTHER PUBLIC AGENCIES

SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Industrial and Commercial</i> LAC230613-16 Romaine & Sycamore	The project consists of demolition of three existing buildings totaling 3,535 square feet and construction of a 200,990 square foot commercial building on 2.05 acres. The project located on the southeast corner of Romaine Street and Sycamore Avenue. http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/july-2023/LAC230613-16.pdf Comment Period: 6/9/2023- 7/10/2023 Public Hearing: N/A	Notice of Preparation	City of Los Angeles	South Coast AQMD staff commented on 7/7/2023
<i>Waste and Water-related</i> LAC230606-05 Former Renu Plating Company, Inc. (Proposed Nevin Park Site)	The project consists of a Soil Management Plan (SMP) to remove the top two feet of soil and replace with clean imported fill for the future development of a park on 0.25 acre. The project is located near the northeast corner of Compton Avenue and East 32nd Street in Los Angeles within the designated AB 617 South Los Angeles community. Reference LAC141008-02 http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/august-2023/LAC230606-05.pdf Comment Period: N/A Public Hearing: N/A	Other	Department of Toxic Substances Control	South Coast AQMD staff commented on 8/11/2023
<i>Waste and Water-related</i> ODP230621-09 Otay Ranch Village 3	The project consists of installation of Sub-Slab Ventilation (SSV) with a Vapor Barrier to address soil contaminated with methane and Volatile Organic Compounds (VOCs) on 9.73 acres. The project is located near the northeast corner of Heritage Road and Paseo Cultura in Chula Vista. http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/july-2023/ODP230621-09.pdf Comment Period: 6/16/2023- 7/17/2023 Public Hearing: N/A	Draft Removal Action Workplan	Department of Toxic Substances Control	South Coast AQMD staff commented on 7/17/2023
<i>Waste and Water-related</i> ORC230516-03 Ascon Landfill Site	The project consists of pilot testing of odor control technologies to restart remediation at the Ascon Landfill Site. The project is located at 21641 Magnolia Street near the southeast corner of Magnolia Street and Hamilton Avenue in Huntington Beach. http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/august-2023/ORC230516-03.pdf Comment Period: N/A Public Hearing: 5/31/2023	Other	Department of Toxic Substances Control	South Coast AQMD staff commented on 8/11/2023
<i>Waste and Water-related</i> ORC230628-10 Sunrise Village	The project consists of two cleanup alternatives to address areas of soil and soil gas contaminated with solvent volatile organic compounds (VOCs): 1) Contaminated soil will be excavated, stockpiled, and transported for disposal at a permitted facility, and 2) Installation of a Vapor Intrusion Mitigation System (VIMS) beneath future residential buildings which can be activated to prevent entry of chemical vapors into the building. The project is located at 1801 North Euclid Street near southwest corner of Rosecrans Avenue and Euclid Street in Fullerton. http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/july-2023/ORC230628-10.pdf Comment Period: 6/29/2023- 7/31/2023 Public Hearing: N/A	Draft Response Plan	Department of Toxic Substances Control	South Coast AQMD staff commented on 7/27/2023

- Project has potential environmental justice concerns due to the nature and/or location of the project.

**ATTACHMENT C
PROPOSED AIR PERMIT PROJECTS FOR
WHICH SOUTH COAST AQMD IS CEQA LEAD
AGENCY THROUGH JULY 31, 2023**

PROJECT DESCRIPTION	PROPONENT	TYPE OF DOCUMENT	STATUS	CONSULTANT
<p>Quemetco is proposing to modify existing South Coast AQMD permits to allow the facility to recycle more batteries and to eliminate the existing daily idle time of the furnaces. The proposed project will increase the rotary feed drying furnace feed rate limit from 600 to 750 tons per day and increase the amount of total coke material allowed to be processed. In addition, the project will allow the use of petroleum coke in lieu of or in addition to calcined coke, and remove one existing emergency diesel-fueled internal combustion engine (ICE) and install two new emergency natural gas-fueled ICEs.</p>	<p>Quemetco</p>	<p>Environmental Impact Report (EIR)</p>	<p>The Draft EIR was released for a 124-day public review and comment period from October 14, 2021 to February 15, 2022 and approximately 200 comment letters were received.</p> <p>Staff held two community meetings, on November 10, 2021 and February 9, 2022, which presented an overview of the proposed project, the CEQA process, detailed analysis of the potentially significant environmental topic areas, and the existing regulatory safeguards. Written comments submitted relative to the Draft EIR and oral comments made at the community meetings, along with responses will be included in the Final EIR which is currently being prepared by the consultant.</p> <p>After the Draft EIR public comment and review period closed, Quemetco submitted additional applications for other permit modifications which are also being evaluated by staff.</p>	<p>Trinity Consultants</p>
<p>Sunshine Canyon Landfill is proposing to modify its South Coast AQMD permits for its active landfill gas collection and control system to accommodate the increased collection of landfill gas. The proposed project will: 1) install two new low emission flares with two additional 300-horsepower electric blowers; and 2) increase the landfill gas flow limit of the existing flares.</p>	<p>Sunshine Canyon Landfill</p>	<p>Subsequent Environmental Impact Report (SEIR)</p>	<p>South Coast AQMD staff reviewed and provided comments on the preliminary air quality analysis, health risk assessment (HRA), and Preliminary Draft SEIR which are currently being addressed by the consultant.</p>	<p>SCS Engineers</p>
<p>Tesoro is proposing to modify its Title V permit to: 1) add gas oil as a commodity that can be stored in three of the six new crude oil storage tanks at the Carson Crude Terminal (previously assessed in the May 2017 Final EIR); and 2) drain, clean and decommission Reservoir 502, a 1.5 million barrel concrete lined, wooden-roof topped reservoir used to store gas oil.</p>	<p>Tesoro Refining & Marketing Company, LLC (Tesoro)</p>	<p>Addendum to the Final Environmental Impact Report (EIR) for the May 2017 Tesoro Los Angeles Refinery Integration and Compliance Project (LARIC)</p>	<p>The consultant provided a Preliminary Draft Addendum, which is undergoing South Coast AQMD staff review.</p>	<p>Environmental Audit, Inc.</p>

[↑ Back to Agenda](#)

BOARD MEETING DATE: September 1, 2023

AGENDA NO. 21

REPORT: Rule and Control Measure Forecast

SYNOPSIS: This report highlights South Coast AQMD rulemaking activities and public hearings scheduled for 2023.

COMMITTEE: No Committee Review

RECOMMENDED ACTION:
Receive and file.

Wayne Natri
Executive Officer

SLR:MK:IM:JA:ZS

2023 MASTER CALENDAR

The 2023 Master Calendar provides a list of proposed or proposed amended rules for each month, with a brief description, and a notation in the third column indicating if the rulemaking is for an AQMP, either the 2016 AQMP or 2022 AQMP, when adopted, Toxics, AB 617 (for BARCT) or measures identified in an AB 617 Community Emission Reduction Plan (CERP), SIP to address comments or actions from U.S. EPA for a rule that is in an approved SIP, or Other. Rulemaking efforts that are noted for implementation of the 2016 AQMP or 2022 AQMP when adopted, Toxics, and AB 617 are either statutorily required and/or are needed to address a public health concern. Projected emission reductions will be determined during rulemaking.

The following symbols next to the rule number indicate if the rulemaking will be a potentially significant hearing, will reduce criteria pollutants, or is part of the RECLAIM transition. Symbols have been added to indicate the following:

- * *This rulemaking may have a substantial number of public comments.*
- + *This rulemaking will reduce criteria air contaminants and assist toward attainment of ambient air quality standards.*
- # *This rulemaking is part of the transition of RECLAIM to a command-and-control regulatory structure.*

The following table provides a list of changes since the previous Rule Forecast Report.

1146.2	Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters
Proposed Amended Rule 1146.2 is being moved from November to first Quarter 2024 to allow additional time for staff to work with stakeholders on rule proposal and BARCT assessment.	
2011	Requirements for Monitoring, Reporting, and Recordkeeping for Oxides of Sulfur (SO_x) Emissions
2012	Requirements for Monitoring, Reporting, and Recordkeeping for Oxides of Nitrogen (NO_x) Emissions
Proposed Amended Rules 2011 and 2012 are being added to November 2023 to include a provision that allows the owner or operator to shutdown the Continuous Emission Monitoring System (CEMS) when the combustion source is scheduled to be shutdown for an extended period of time.	

2023 MASTER CALENDAR

Month	Title and Description	Type of Rulemaking
October		
1405*	<p>Control of Ethylene Oxide Emissions from Sterilization and Related Operations Amendments needed to address ethylene oxide emissions from sterilization of medical equipment. <i>Kalam Cheung 909.396.3281; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics
November		
1180	<p>Petroleum Refinery and Related Operations Fenceline and Community Air Monitoring Rule 1180 will be amended to consider expanding the target list of compounds to include compounds identified in the OEHHA’s updated priority list published in 2019. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other
1180.1	<p>Other Refinery Fenceline and Community Monitoring Proposed Rule 1180.1 will establish fenceline and community monitoring requirements for non-petroleum refineries and facilities that are not currently included in Rule 1180 – Refinery Fenceline and Community Air Monitoring. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other
2011 2012	<p>Requirements for Monitoring, Reporting, and Recordkeeping for Oxides of Sulfur (SOx) Emissions Requirements for Monitoring, Reporting, and Recordkeeping for Oxides of Nitrogen (NOx) Emissions Proposed Amended Rules 2011 and 2012 will allow the SOx and NOx, respectively, Continuous Emission Monitoring System (CEMS) to shutdown when the combustion source for which the CEMS is monitoring is scheduled to be shutdown for an extended period of time. <i>Michael Morris 909.396.3282; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other

* Potentially significant hearing

+ Reduce criteria air contaminants and assist toward attainment of ambient air quality standards

Part of the transition of RECLAIM to a command-and-control regulatory structure

2023 MASTER CALENDAR (Continued)

Month	Title and Description	Type of Rulemaking
December		
1135 ⁺	<p>Emissions of Oxides of Nitrogen from Electricity Generating Facilities Proposed Amended Rule 1135 will modify provisions for electricity generating units at Santa Catalina Island to reflect a revised BARCT assessment. <i>Michael Morris 909.396.3282; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP/ AB 617 BARCT
2304 ^{*+}	<p>Marine Port Indirect Source Rule Proposed Rule 2304 will establish requirements to reduce emissions from indirect sources related to marine ports. <i>Elaine Shen 909.396.2715; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP/ AB 617 CERP
2306 ^{*+}	<p>New Intermodal Railyard Indirect Source Rule Proposed Rule 2306 will establish requirements for new intermodal railyards to minimize emissions from indirect sources associated with new railyards. <i>Elaine Shen 909.396.2715; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP/ AB 617 CERP

* Potentially significant hearing

+ Reduce criteria air contaminants and assist toward attainment of ambient air quality standards

Part of the transition of RECLAIM to a command-and-control regulatory structure

TENTATIVE 2024 CALENDAR

Month	Title and Description	Type of Rulemaking
1 st Quarter		
1118* ⁺	<p>Control of Emissions from Refinery Flares Proposed Amended Rule 1118 will seek to incorporate provisions to further reduce flaring at refineries, for clean service flares, and facility thresholds. Other amendments to improve clarity and to remove obsolete provisions.</p> <p style="text-align: right;"><i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP/ AB 617 CERP
1146.2 ^{# +}	<p>Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters Proposed Amended Rule 1146.2 will update the NOx emission limits to reflect BARCT. Other provisions may be added to facilitate the deployment of zero-emission units regulated under the proposed amended rule.</p> <p style="text-align: right;"><i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP/ AB 617 BARCT
1148.1* ⁺	<p>Oil and Gas Production Wells Proposed Amendments to Rule 1148.1 may be needed to further reduce emissions from operations, implement early leak detection, odor minimization plans, and enhanced emissions and chemical reporting from oil and drilling sites.</p> <p style="text-align: right;"><i>Michael Morris 909.396.3282; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other/ AB 617 CERP
1159.1 [#]	<p>Control of NOx Emissions from Nitric Acid Tanks Proposed Rule 1159.1 will establish requirements to reduce NOx emissions from nitric acid units that will apply to RECLAIM, former RECLAIM, and non-RECLAIM facilities.</p> <p style="text-align: right;"><i>Kalam Cheung 909.396.3281; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP/ AB 617 BARCT
Regulation XIII* [#]	<p>New Source Review Proposed Amended Regulation XIII will revise New Source Review provisions to address facilities that are transitioning from RECLAIM to a command-and-control regulatory structure and to address comments from U.S. EPA. Additional rules under Regulation XIII may be needed to address offsets and other provisions under Regulation XIII.</p> <p style="text-align: right;"><i>Michael Morris 909.396.3282; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP
Regulation XX* [#]	<p>RECLAIM Proposed Amended Regulation XX will address the transition of RECLAIM facilities to a command-and-control regulatory structure.</p> <p style="text-align: right;"><i>Michael Morris 909.396.3282; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP

* Potentially significant hearing

+ Reduce criteria air contaminants and assist toward attainment of ambient air quality standards

Part of the transition of RECLAIM to a command-and-control regulatory structure

TENTATIVE 2024 CALENDAR (Continued)

Month	Title and Description	Type of Rulemaking
2 nd Quarter		
317	<p>Clean Air Act Non-Attainment Fees Proposed amendments may be needed to modify CAA Section 185 fees for non-attainment. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other
1151	<p>Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations Proposed Amended Rule 1151 will provide clarifications of current requirements and amend provisions to address implementation issues. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other/ AB 617 CERP
1173 ⁺	<p>Control of Volatile Organic Compound Leaks and Releases Components at Petroleum Facilities and Chemical Plants Proposed Amended Rule 1173 will further reduce emissions from petroleum and chemical plants by requiring early leak detection approaches. <i>Michael Morris 909.396.3282; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP/ AB 617 CERP
1435 [*]	<p>Control of Toxic Air Contaminant Emissions from Metal ing Operations Proposed Rule 1435 will establish requirements to reduce point source and fugitive toxic air contaminants including hexavalent chromium emissions from heat treating processes. Proposed Rule 1435 will also include monitoring, reporting, and recordkeeping requirements. <i>Kalam Cheung 909.396.3281; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP/ AB 617 CERP
1445 [*]	<p>Control of Toxic Emissions from Laser Arc Cutting Proposed Rule 1445 will establish requirements to reduce hexavalent chromium and other metal toxic air contaminant particulate emissions from laser arc cutting. <i>Kalam Cheung 909.396.3281; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics

* Potentially significant hearing

+ Reduce criteria air contaminants and assist toward attainment of ambient air quality standards

Part of the transition of RECLAIM to a command-and-control regulatory structure

2023 To-Be-Determined

2023	Title and Description	Type of Rulemaking
102	<p>Definition of Terms Proposed amendments may be needed to update and add definitions, and potentially modify exemptions. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other
103	<p>Definition of Geographical Areas Proposed amendments are needed to update geographic areas to be consistent with state and federal references to those geographic areas. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other
209	<p>Transfer and Voiding of Permits Proposed amendments may be needed to clarify requirements for change of ownership and permits and the assessment of associated fees. <i>Kalam Cheung 909.396.3281; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other
223	<p>Emission Reduction Permits for Large Confined Animal Facilities Proposed Amended Rule 223 will seek additional ammonia emission reductions from large, confined animal facilities by lowering the applicability threshold. Proposed amendments will implement BCM-04 in the 2016 AQMP. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP
403	<p>Fugitive Dust Proposed Amended Rule 403 will seek to remove outdated provisions and add clarification of existing provisions to enhance compliance. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other
403.1	<p>Supplemental Fugitive Dust Control Requirements for Coachella Valley Sources Proposed Amended Rule 403.1 would clarify existing requirements for dust control and remove outdated provisions contained in supporting documents for Rule 403.1. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other
407 [#]	<p>Liquid and Gaseous Air Contaminants Proposed Amended Rule 407 will update SO_x emission limits to reflect Best Available Retrofit Control Technology, if needed, remove exemptions for RECLAIM facilities, and update monitoring, reporting, and recordkeeping requirements. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AB 617 BARCT

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2023 To-Be-Determined (Continued)

2023	Title and Description	Type of Rulemaking
410	<p>Odors from Transfer Stations and Material Recovery Facilities Proposed Amended Rule 410 will clarify existing provisions. Additional provisions may be needed to address activities associated with diversion of food waste to transfer stations or material recovery facilities. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other
425	<p>Odors from Cannabis Processing Proposed Rule 425 will establish requirements for control of odors from cannabis processing. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other
430	<p>Breakdown Provisions Amendments to Rule 430 will need to be amended to remove exemptions for facilities that exit the RECLAIM program and update references to CEMS rules. Other amendments may be needed to address current policies from U.S. EPA regarding startup, shutdown, and malfunction requirements. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	RECLAIM/ Other
431.1 [#]	<p>Sulfur Content of Gaseous Fuels Proposed Amended Rule 431.1 will assess exemptions, including RECLAIM, and update other provisions, if needed. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AB 617 BARCT/ AB 617 CERP
431.2 [#]	<p>Sulfur Content of Liquid Fuels Proposed Amended Rule 431.2 will assess exemptions, including RECLAIM, and update other provisions, if needed. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AB 617 BARCT/ AB 617 CERP
431.3 [#]	<p>Sulfur Content of Fossil Fuels Proposed Amended Rule 431.3 will assess exemptions, including RECLAIM, and update other provisions, if needed. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AB 617 BARCT/ AB 617 CERP
444	<p>Open Burning Amendments may be needed to clarify existing provisions. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other
445 [*]	<p>Wood Burning Devices Proposed Amended Rule 445 will address additional U.S. EPA requirements for Best Available Control Measures and potentially address ozone contingency measure requirements for the Coachella Valley. Amendments may be needed to revise the penalty structure for violations on No Burn Days during the wood burning season. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP

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2023 To-Be-Determined (Continued)

2023	Title and Description	Type of Rulemaking
461	<p>Gasoline Transfer and Dispensing Amendments to Rule 461 may be needed to address potential regulatory gaps. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other
461.1	<p>Gasoline Transfer and Dispensing for Mobile Fueling Operations Amendments to Rule 461.1 may be needed to address new information or to improve implementation since this is a newly adopted rule. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other
462	<p>Organic Liquid Loading Proposed Amended Rule 462 will incorporate the use of advanced techniques to detect fugitive emissions and Facility Vapor Leak. Other amendments may be needed to streamline implementation and add clarity. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other
468 [#]	<p>Sulfur Recovery Units Proposed Amended Rule 468 will update SO_x emission limits to reflect Best Available Retrofit Control Technology, if needed, remove exemptions for RECLAIM facilities, and update monitoring, reporting, and recordkeeping requirements. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AB 617 BARCT
469 [#]	<p>Sulfuric Acid Units Proposed Amended Rule 469 will update SO_x emission limits to reflect Best Available Retrofit Control Technology, if needed, remove exemptions for RECLAIM facilities, and update monitoring, reporting, and recordkeeping requirements. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AB 617 BARCT
1101 [#]	<p>Secondary Lead Smelters/Sulfur Oxides Proposed Amended Rule 1101 will update SO_x emission limits to reflect Best Available Retrofit Control Technology, if needed, remove exemptions for RECLAIM facilities, and update monitoring, reporting, and recordkeeping requirements. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AB 617 BARCT

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2023 To-Be-Determined (Continued)

2023	Title and Description	Type of Rulemaking
1102	<p>Dry Cleaners Using Solvent Other Than Perchloroethylene Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Michael Morris 909.396.3282; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AB 617 CERP
1105 [#]	<p>Fluid Catalytic Cracking Units SOx Proposed Amended Rule 1105 will update SOx emission limits to reflect Best Available Retrofit Control Technology, if needed, remove exemptions for RECLAIM facilities, and update monitoring, reporting, and recordkeeping requirements. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AB 617 BARCT/ AB 617 CERP
1107	<p>Coating of Metal Parts and Products Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics/ Other
1108	<p>Cutback Asphalt Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics/ Other
1108.1	<p>Emulsified Asphalt Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics/ Other
1110.2* ^{+#}	<p>Emissions from Gaseous- and Liquid-Fueled Engines Proposed amendments will address use of emergency standby engines at essential public services for Public Safety Power Shutoff programs. Proposed amendments may also be needed to incorporate possible comments by U.S. EPA for approval into the SIP and address monitoring provisions for new engines. <i>Michael Morris 909.396.3282; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP/ AB 617 BARCT
1110.3 ⁺ 1110.2	<p>Emissions from Linear Generators Emissions from Gaseous - and Liquid-Fueled Engines Proposed Rule 1110.3 will establish emission standards and requirements for the linear generators. Rule 1110.2 will need to be amended to remove existing provisions for linear generators. <i>Michael Morris 909.396.3282; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other

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2023 To-Be-Determined (Continued)

2023	Title and Description	Type of Rulemaking
1110.4 1401 1470	<p>Emissions from Emergency Generators New Source Review of Toxic Air Contaminants Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines Proposed Rule 1110.4 and Proposed Amended Rule 1470 will establish and revise rule provisions to reduce NOx, CO, and PM emissions from emergency generators. Proposed Amended Rule 1401 will remove the exemption for emergency generators and therefore require a demonstration that risk thresholds are not exceeded in order to obtain a permit. <i>Michael Morris 909.396.3282; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics/ Other
1111	<p>Reduction of NOx Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces Proposed Amended Rule 1111 will implement the 2022 control measure requiring zero emission residential space heating. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP
1111.1	<p>Zero-Emission Residential Furnaces Proposed Rule 1111.1 may include provisions to encourage zero emission residential furnaces that goes beyond Rule 1111 for gas-fired furnaces. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP
1113	<p>Architectural Coatings Proposed amendments may be needed to address delisted compounds and other amendments to improve clarity and to remove obsolete provisions. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other
1114	<p>Petroleum Refinery Coking Operations Proposed Amended Rule 1114 will seek to add notification requirements when coke particles, liquid and/or gas is ejected from the coke drum during cutting. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other
1119 [#]	<p>Petroleum Coke Calcining Operations – Oxides of Sulfur Proposed Amended Rule 1119 will update SOx emission limits to reflect Best Available Retrofit Control Technology, if needed, remove exemptions for RECLAIM facilities, and update monitoring, reporting, and recordkeeping requirements. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AB 617 BARCT/ AB 617 CERP

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2023 To-Be-Determined (Continued)

2023	Title and Description	Type of Rulemaking
1121*	<p>Control of Nitrogen Oxides from Residential Type, Natural-Gas-Fired Water Heaters Proposed amendments may be needed to further reduce NOx emissions from water heaters. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP
1121.1	<p>Zero Emission Residential Water Heaters Proposed Rule 1121.1 may include provisions to encourage zero emission water heaters that goes beyond Rule 1121 for gas-fired water heaters. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP
1122	<p>Solvent Degreasers Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics/ Other
1124	<p>Aerospace Assembly and Component Manufacturing Operations Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics/ Other
1125	<p>Metal Container, Closure, and Coil Coating Operations Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics/ Other
1126	<p>Magnet Wire Coating Operations Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics/ Other
1128	<p>Paper, Fabric, and Film Coating Operations Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics/ Other

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2023 To-Be-Determined (Continued)

2023	Title and Description	Type of Rulemaking
1130	<p>Graphic Arts Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics/ Other
1130.1	<p>Screen Printing Operations Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics/ Other
1133.3	<p>Emission Reductions from Greenwaste Composting Operations Proposed Amended Rule 1133.3 will seek additional VOCs and ammonia emission reductions from greenwaste and foodwaste composting. Proposed amendments will implement BCM-10 in the 2016 AQMP. <i>Michael Morris 909.396.3282; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP
1136	<p>Wood Products Coatings Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics/ Other
1138 ⁺	<p>Control of Emissions from Restaurant Operations Proposed Amended Rule 1138 will further reduce emissions from underfired charboilers. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP
1142	<p>Marine Tank Vessel Operations Proposed Amended Rule 1142 will address VOC and hydrogen sulfide emissions from marine tank vessel operations, applicability, noticing requirements, and provide clarifications. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other
1143	<p>Consumer Paint Thinners and Multi-Purpose Solvents Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics/ Other

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2023 To-Be-Determined (Continued)

2023	Title and Description	Type of Rulemaking
1144	<p>Metalworking Fluids and Direct-Contact Lubricants Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics/ Other
1145	<p>Plastic, Rubber, Leather, and Glass Coatings Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics/ Other
1146	<p>Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters Proposed amendments to Rule 1146 may be needed to incorporate comments from U.S. EPA. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other
1146.1 [#]	<p>Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters Proposed amendments to Rule 1146.1 may be needed to clarify provisions for industry-specific categories and to incorporate comments from U.S. EPA. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other
1162	<p>Polyester Resin Operations Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics/ Other
1165	<p>Control of Emissions from Incinerators Proposed Rule 1165 will establish emission standards, source testing, and monitoring, recordkeeping, and reporting requirements for incinerators. <i>Michael Morris 909.396.3282; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP
1166	<p>Volatile Organic Compound Emissions from Decontamination of Soil Proposed Amended Rule 1166 will update requirements, specifically concerning notifications and usage of mitigation plans (site specific versus various locations). <i>Michael Morris 909.396.3282; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other

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2023 To-Be-Determined (Continued)

2023	Title and Description	Type of Rulemaking
1171	<p>Solvent Cleaning Operations Proposed Amendments to Rule 1171 may be needed to address certain exempt chemicals and compliance issues. <i>Michael Morris 909.396.3282; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics/ Other
1174	<p>Control of Volatile Organic Compound Emissions from the Ignition of Barbecue Charcoal Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP/ Other
1176	<p>VOC Emissions from Wastewater Systems Proposed Amended Rule 1176 will clarify the applicability of the rule to include bulk terminals under definition of “Industrial Facilities,” and streamline and clarify provisions. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other/ AB 617 CERP
1186.1, 1191, 1192, 1193, 1194, 1195, 1196* +	<p>Fleet Rules Proposed amendments to Rules 1186.1, 1191, 1192, 1193, 1194, 1195, 1196 will seek to align South Coast AQMD fleet rules with CARB’s final Advanced Clean Fleets should it be adopted. <i>Vicki White 909.396.3436; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP/ Other
1403*	<p>Asbestos Emissions from Demolition/Renovation Activities Proposed Amended Rule 1403 will enhance implementation, improve rule enforceability, update provisions, notifications, exemptions, and align provisions with the applicable U.S. EPA National Emission Standard for Hazardous Air Pollutants (NESHAP) and other state and local requirements as necessary. <i>Kalam Cheung 909.396.3281; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics
1404	<p>Hexavalent Chromium Emissions from Cooling Towers Amendments may be needed to provide additional clarifications regarding use of process water that is associated with sources that have the potential to contain chromium in cooling towers and address VOC emissions. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics/ AQMP
1405*	<p>Control of Ethylene Oxide and Chlorofluorocarbon Emissions from Sterilization or Fumigation Processes Amendments to address ethylene oxide emissions from facilities and provisions not considered in earlier amendment. <i>Kalam Cheung 909.396.3281; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics

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2023 To-Be-Determined (Continued)

2023	Title and Description	Type of Rulemaking
1411	<p>Recovery or Recycling of Refrigerants from Motor Vehicle Air Conditioners Proposed Amended Rule 1411 seeks amendments to coincide with Section 609 of the Clean Air Act. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics
1415 1415.1	<p>Reduction of Refrigerant Emissions from Stationary Air Conditioning Systems, and Reduction of Refrigerant Emissions from Stationary Refrigeration Systems Proposed Amended Rules 1415 and 1415.1 will align requirements with the proposed CARB Refrigerant Management Program and U.S. EPA’s Significant New Alternatives Policy Rule provisions relative to prohibitions on specific hydrofluorocarbons. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Other
1420	<p>Emissions Standard for Lead Proposed Amended Rule 1420 will update requirements to address arsenic emissions to close a regulatory gap between Rule 1420 and Rule 1407 - Control of Emissions of Arsenic, Cadmium, and Nickel from Non-Ferrous Metal Melting Operations. Other provisions may be needed to address storage and handling requirements, and revise closure requirements. <i>Michael Morris 909.396.3282; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics
1420.1	<p>Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities Proposed Amendments are needed to update applicable test methods and provide clarifications regarding submittal of a source-test protocol. Additional amendments may be needed to address monitoring and post closure requirements. <i>Michael Morris 909.396.3282; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics
1420.2	<p>Emission Standards for Lead from Metal Melting Facilities Proposed Amended Rule 1420.2 will update requirements to address arsenic emissions to close a regulatory gap between Rule 1420 and Rule 1407 - Control of Emissions of Arsenic, Cadmium, and Nickel from Non-Ferrous Metal Melting Operations. Additional amendments may be needed to address monitoring and post closure requirements. <i>Kalam Cheung 909.396.3281; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics

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2023 To-Be-Determined (Continued)

2023	Title and Description	Type of Rulemaking
1420.3	<p>Emissions Standards for Lead from Firing Ranges Proposed Rule 1420.3 will establish requirements to address lead emissions from firing ranges. <i>Kalam Cheung 909.396.3281; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Others
1426.1	<p>Hexavalent Chromium Emissions from Metal Finishing Operations Proposed Rule 1426.1 will reduce hexavalent chromium emissions from heated chromium tanks used at facilities with metal finishing operations that are not subject to Rule 1469. <i>Kalam Cheung 909.396.3281; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics
1430	<p>Control of Emissions from Metal Grinding Operations at Metal Forging Facilities Amendments to Rule 1430 may be needed to further reduce emissions and odors from metal grinding and metal cutting operations at metal forging facilities. <i>Kalam Cheung 909.396.3281; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AB 617 CERP
1450*	<p>Control of Methylene Chloride Emissions Proposed Rule 1450 will reduce methylene chloride emissions from furniture stripping and establish monitoring, reporting, and recordkeeping requirements. <i>Michael Morris 909.396.3282; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics
1455	<p>Control of Hexavalent Chromium Emissions from Torch Cutting and Welding Proposed Rule 1455 will establish requirements to reduce hexavalent chromium emissions from torch cutting and welding of chromium alloys. <i>Kalam Cheung 909.396.3281; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics/ AB 617 CERP
1466	<p>Control of Particulate Emissions from Soils with Toxic Air Contaminants Amendments may be needed to residential cleanup projects. <i>Michael Morris 909.396.3282; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics
1466.1	<p>Control of Particulate Emissions from Demolition of Buildings Proposed Rule 1466.1 will establish requirements to minimize PM emissions during the demolition of buildings that housed equipment and processes with metal toxic air contaminants and pollution control equipment. <i>Michael Morris 909.396.3282; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics

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2023 To-Be-Determined (*Continued*)

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2023	Title and Description	Type of Rulemaking
1469	<p>Hexavalent Chromium Emissions from Chromium Electroplating and Chromic Acid Anodizing Operations Amendments to Rule 1469 may be needed to address potential changes with the CARB’s Hexavalent Chromium Airborne Toxic Control Measure for Chrome Plating and Chromic Acid Anodizing Operations. <i>Kalam Cheung 909.396.3281; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics
1470.1	<p>Emissions from Emergency Standby Diesel Fueled Engines Proposed Rule 1470.1 seeks to reduce NOx emissions from emergency standby internal combustion engines (ICEs) by replacing older ICEs and requiring the use of commercially available lower emission fuels, such as renewable diesel. <i>Michael Morris 909.396.3282; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP
1472	<p>Requirements for Facilities with Multiple Stationary Emergency Standby Diesel-Fueled Internal Combustion Engines Proposed Amended Rule 1472 will remove provisions that are no longer applicable, update and streamline provisions to reflect the 2015 Health Risk Assessment Guidelines and assess the need for Compliance Plans. <i>Michael Morris 909.396.3282; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	Toxics
1901	<p>General Conformity Proposed Amended Rule 1901 will establish a new General Conformity determination process for applicable projects receiving federal funding or approval. <i>TBD; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP
2306.1 ^{*+}	<p>Existing Intermodal Railyard Indirect Source Rule Proposed Rule 2306.1 will establish requirements for existing intermodal railyards to minimize emissions from indirect sources associated with these facilities. <i>Elaine Shen 909.396.2715; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP/ AB 617 CERP
Regulation XX	<p>RECLAIM - Requirements for Oxides of Sulfur (SOx) Emissions Amendments to Regulation XX rules to address SOx requirements at RECLAIM facilities if there is consideration to transition SOx RECLAIM to command-and-control regulatory structure. <i>Michael Morris 909.396.3282; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	RECLAIM/ Other
Regulation XXIII ^{*+}	<p>Facility-Based Mobile Sources Proposed rules within Regulation XXIII would reduce emissions from indirect sources (e.g., facilities that attract mobile sources). <i>Elaine Shen 909.396.2715; CEQA: Barbara Radlein 909.396.2716; Socio: Elaine Shen 909.396.2715</i></p>	AQMP/ AB 617 CERP

2023 To-Be-Determined (Continued)

* Potentially significant hearing

+ Reduce criteria air contaminants and assist toward attainment of ambient air quality standards

Part of the transition of RECLAIM to a command-and-control regulatory structure

2023	Title and Description	Type of Rulemaking
Regulation II, III, IV, XIV, XI, XIX, XXIII, XXIV, XXX and XXXV	<p>Various rule amendments may be needed to meet the requirements of state and federal laws, implement OEHHA’s 2015 revised risk assessment guidance, changes from OEHHA to new or revised toxic air contaminants or their risk values, address variance issues, emission limits, technology-forcing emission limits, conflicts with other agency requirements, to abate a substantial endangerment to public health, additional reductions to meet SIP short-term measure commitments, to address issues raised by U.S. EPA or CARB for the SIP or for a rule that was submitted into the SIP, compliance issues that are raised by the Hearing Board. Amendments to existing rules may be needed to address use of materials that contain chemicals of concern. The associated rule development or amendments include, but are not limited to, South Coast AQMD existing, or new rules to implement measures in the 2012, 2016 or 2022 AQMP (upon adoption). This includes measures in the 2016 AQMP to reduce toxic air contaminants or reduce exposure to air toxics from stationary, mobile, and area sources. Rule adoption or amendments may include updates to provide consistency with CARB Statewide Air Toxic Control Measures, U.S. EPA’s National Emission Standards for Hazardous Air Pollutants, or to address the lead National Ambient Air Quality Standard. Rule adoption or amendments may be needed to implement AB 617 including but not limited to BARCT rules, Community Emission Reduction Plans prepared pursuant to AB 617, or new or amended rules to abate a public health issue identified through emissions testing or ambient monitoring.</p>	Other/ AQMP/ Toxics/ AB 617 BARCT/ AB 617 CERP

* *Potentially significant hearing*

+ *Reduce criteria air contaminants and assist toward attainment of ambient air quality standards*

Part of the transition of RECLAIM to a command-and-control regulatory structure

 Back to Agenda

BOARD MEETING DATE: September 1, 2023

AGENDA NO. 22

PROPOSAL: Report of RFQs/RFPs Scheduled for Release in September

SYNOPSIS: This report summarizes the RFQs/RFPs for budgeted services over \$100,000 scheduled to be released for advertisement for the month of September.

COMMITTEE: Administrative, August 11, 2023, Reviewed

RECOMMENDED ACTION:

Approve the release of RFQs/RFPs for the month of September.

Wayne Natri
Executive Officer

SJ:gp

Background

In January 2020 the Board approved a revised Procurement Policy and Procedure. Under the revised policy, RFQs/RFPs for budgeted items over \$100,000 that follow the Procurement Policy and Procedure would no longer be required to obtain individual Board approval. However, a monthly report of all RFQs/RFPs over \$100,000 is included as part of the Board agenda package and the Board may, if desired, take individual action on any item. The attached report provides the title and synopsis of the RFQ/RFP, the budgeted funds available, and the name of the Deputy Executive Officer/Assistant 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 1, 2023.

Outreach

In accordance with South Coast AQMD's Procurement Policy and Procedure, a public notice advertising the RFQs/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 South Coast AQMD's own electronic listing of certified minority vendors. Notice of the RFQs/RFPs will be emailed to the Black and Latino Legislative Caucuses and various minority chambers of commerce and business associations and placed on South Coast AQMD'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 RFQs/RFPs Scheduled for Release in September 2023

**September 1, 2023 Board Meeting
Report on RFQs/RFPs Scheduled for Release on September 1, 2023**

**(For detailed information visit South Coast AQMD's website at
<http://www.aqmd.gov/nav/grants-bids>
following Board approval on September 1, 2023)**

SPECIAL TECHNICAL EXPERTISE

RFP #P2024-03	Issue RFP for Management Firm to Operate South Coast AQMD's Diamond Bar Headquarters Cafeteria	Olvera/2309
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The current contract to manage and operate South Coast AQMD's headquarters cafeteria expires April 30, 2024. This action is to issue an RFP to solicit proposals from qualified food service management firms interested in providing this service for the next three-year period, from May 1, 2024 to April 30, 2027, with the option to extend for two one-year extensions.

BOARD MEETING DATE: September 1, 2023

AGENDA NO. 23

REPORT: FY 2022-23 Contract Activity

SYNOPSIS: This report lists the number of contracts let during FY 2022-23, the respective dollar amounts, award type and the authorized contract signatory for South Coast AQMD. This report includes the data provided in the March 3, 2023 report covering contract activity for the first six months of FY 2022-23.

COMMITTEE: No Committee Review

RECOMMENDED ACTION:
Receive and file.

Wayne Natri
Executive Officer

SJ:DH:gp

Background

The Board's Procurement Policy and Procedures requires staff to provide semi-annual reports to the Board on contract activity. This report is for the period of July 1, 2022-June 30, 2023. It includes the data provided in the March 3, 2023 report that covered contract activity for the first six months (July 1, 2022-December 31, 2022). 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 South Coast AQMD office space;
3. **Sponsorships** – contracts funding public events and technical conferences which provide air quality related benefits;
4. **Modifications** – amendments to existing contracts usually reflecting changes in the project scope and/or schedule and associated cost increase, as applicable; and
5. **Terminated Contracts** – Partial/No Work Performed – modifications to contracts to reflect termination of a portion or all 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

The total value of all contracts and contract modifications for this period (FY 2022-23) was \$216,965,258.59, with 255 contracts and contract modifications totaling \$213,468,639.02 (98 percent) approved by the Board and 317 contracts and contract modifications totaling \$3,496,619.57 (2 percent) approved by the Executive Officer. This does not include modifications for termination with partial or no work completed. Table 1 is a summary of the 604 contracts and modifications (including terminations and the associated amount of de-obligated funding) issued during this period.

Table 1: Contracts, Modifications and Amounts (including terminations)

CONTRACT CATEGORY	NUMBER	AMOUNT
NEW AWARDS	244	\$199,684,935.12
OTHER	72	\$1,211,757.72
SPONSORSHIPS	30	\$394,500.00
MODIFICATIONS	226	\$15,674,065.75
TERMINATIONS	32	-\$10,091,027.92
TOTAL	604	\$206,874,230.67

Of the total value for New Awards, \$140,333,444.87 (70 percent) was awarded through the competitive process. As shown in Table 2, contracts totaling \$3,496,619.57 were approved by the Executive Officer.

Table 2: Contracts Approved by Executive Officer

CONTRACT DESCRIPTION	CONTRACT AMOUNT
Board Member Assistant contracts and contract modifications, as approved by the Board’s Administrative Committee	\$1,196,227.72
Technical consulting/Legal advice	\$531,297.60
Contract modifications for extensions of time or additional budgeted services from previously approved vendors	\$1,211,414.75
Sponsorships in advanced technologies and community and business outreach	\$394,500.00
Miscellaneous services including the lease of alternative fuel vehicles, software subscriptions, memberships, and air monitoring station licenses	\$111,880.50
Venue related services to support clean air outreach events including AB617 meetings	\$51,299.00
Total	\$3,496,619.57

Attachment

Contract Activity Report for the period July 1, 2022 through June 30, 2023.

**South Coast AQMD
Contract Activity Report
July 1, 2022 - June 30, 2023**

DEPT ID	DEPT NAME	CONTRACT NUMBER	FUND CODE	DESCRIPTION	VENDOR NAME	CONTRACT AMOUNT	FOOTNOTE
I. NEW AWARDS							
Competitive - Board Approved							
44	TECHNOLOGY ADVANCEMENT OFFICE	C21253	77	REPOWER 5 MAIN ENGINES OF 2 MARINE VESSELS	CATALINA CLASSIC CRUISES	\$658,917.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C21268	77	REPOWER 1 MAIN ENGINE OF 1 MARINE VESSEL	MORE CARNAGE LLC	\$179,200.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C21272	27,32	REPLACEMENT OF 11 OFF-ROAD EQUIPMENT	LUCKY FARMS, LLC	\$730,532.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C21362	77	REPOWER 2 MAIN ENGINES OF 1 MARINE VESSEL	MV SPORT KING 2015 INC	\$312,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C21385	79	REPLACEMENT OF 27 ON-ROAD FREIGHT TRUCKS	US FOODS INC	\$1,279,112.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22040	32	EXPANSION AND OPERATION OF 1 EXISTING RENEWABLE GAS FILLING STATION	ORANGE UNIFIED SCHOOL DISTRICT	\$910,084.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22068	79	REPLACEMENT OF 2 ON-ROAD WASTE HAULERS	CITY OF SACRAMENTO	\$400,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22078	79	REPLACEMENT OF 2 ON-ROAD WASTE HAULERS	CITY OF FOLSOM	\$400,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22079	79	REPLACE 12 ON-ROAD CLASS 8 FREIGHT TRUCKS	NEW BERN TRANSPORT CORPORATION	\$2,400,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22091	77	CONSTRUCTION AND OPERATION OF 1 NEW BATTERY ELECTRIC INFRASTRUCTURE	MILLER MILLING COMPANY LLC	\$19,841.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22109	32	CONSTRUCT NEW RNG STATION WITH 3 DUAL HOSE FAST FILL DISPENSERS	CITY OF EL MONTE	\$1,427,145.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22151	81	PROP 1B TRUCK REPLACEMENT PROGRAM	STS LOGISTICS INC	\$200,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22153	81	PROP 1B TRUCK REPLACEMENT PROGRAM	YES CARGO INC	\$200,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22185	32	REPLACEMENT OF 2 OFF-ROAD EQUIPMENT	INLAND EMPIRE REGIONAL COMPOSTING	\$164,437.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22193	32	REPLACEMENT OF 2 MARINE VESSEL ENGINES	TOUR SX LLC	\$47,949.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22243	81	PROP 1B TRUCK REPLACEMENT PROGRAM	AJR TRUCKING, INC.	\$1,800,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22248	79	REPLACEMENT OF 1 ON-ROAD CLASS 7 DRAYAGE TRUCK	SEAN ARIAN M PIZARRO	\$46,789.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22252	79	REPLACEMENT OF 7 ON-ROAD CLASS 8 DRAYAGE TRUCKS	MLI LEASING LLC	\$595,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22255	79	REPLACEMENT OF 5 ON-ROAD CLASS 8 DRAYAGE TRUCKS	MORTIMER & WALLACE LLC	\$425,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22263	79	REPLACE 2 ON-ROAD CLASS 8 WASTE HAULERS	SOUTH SAN FRANCISCO SCAVENGER CO INC	\$400,000.00	
27	INFORMATION MANAGEMENT	C22276	01	PRIVATE INTERNET PROTOCOL INTERNET SERVICES	VERIZON ENTERPRISE SOLUTIONS	\$459,405.00	

**South Coast AQMD
Contract Activity Report
July 1, 2022 - June 30, 2023**

DEPT ID	DEPT NAME	CONTRACT NUMBER	FUND CODE	DESCRIPTION	VENDOR NAME	CONTRACT AMOUNT	FOOTNOTE
44	TECHNOLOGY ADVANCEMENT OFFICE	C22277	79	REPLACEMENT OF 2 ON-ROAD CLASS 8 FREIGHT TRUCKS	VALLEY PACIFIC PETROLEUM SERVICES	\$89,925.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22283	32	CONSTRUCTION AND OPERATION OF 4 CHARGING STATIONS	CITY OF GLENDORA	\$107,776.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22285	81	REPLACEMENT OF 50 CLASS 8 DIESEL TRUCKS WITH 50 LOW NO _x TRUCKS	JVC TRUCK LINES INC	\$5,000,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22295	81	PROP 1B TRUCK REPLACEMENT PROGRAM	ECOLOGY AUTO PARTS INC	\$500,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22296	81	REPLACEMENT OF 4 HEAVY DUTY TRUCKS	FIREFREIGHT INC	\$400,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22298	79	REPLACEMENT OF 2 ON-ROAD CLASS 8 DRAYAGE TRUCKS	PEREZ EXPRESS INC	\$170,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22299	32	REPLACEMENT OF 3 LOCOMOTIVES	UNION PACIFIC RAILROAD COMPANY	\$7,157,737.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22302	32	REPLACEMENT OF 27 OFF-ROAD EQUIPMENT	DEPENDABLE HIGHWAY EXPRESS, INC.	\$996,038.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22303	32	REPLACEMENT OF 2 OFF-ROAD EQUIPMENT	ROLLING CAMEL RANCHES INC	\$680,528.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22305	32	REPLACEMENT OF 4 OFF-ROAD EQUIPMENT	SALVADOR MORA	\$209,907.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22308	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	SALVADOR PINA	\$55,896.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22309	79	REPLACEMENT OF 1 ON-ROAD CLASS 8 DRAYAGE TRUCK	SONIC FREIGHT LINE LLC	\$85,000.00	
49	TAO CF/1B/CMP	C22312	32	REPLACEMENT OF 2 OFF-ROAD AGRICULTURAL EQUIPMENT	RAMONA DAIRY LLC	\$355,364.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22314	32	REPLACEMENT OF 2 OFF-ROAD EQUIPMENT	WASHBURN GROVE MANAGEMENT, INC.	\$345,548.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22315	32	REPLACEMENT OF 12 OFF-ROAD EQUIPMENT	UNIVERSAL CITY STUDIOS LLC	\$7,548,060.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22317	32	REPLACEMENT OF 3 OFF ROAD EQUIPMENT	RJ'S DEMOLITION & DISPOSAL	\$357,894.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22323	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	HONDO FRAMING, INC	\$113,411.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22324	32	REPLACEMENT OF 2 OFF-ROAD EQUIPMENT	JIM BOOTSMA JR.	\$308,692.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22325	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	POST BROTHERS CONSTRUCTION	\$156,230.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22326	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	CITRUS PRO INC	\$66,672.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22327	32	REPLACEMENT OF 10 OFF-ROAD EQUIPMENT	EPC LANDSCAPING, LLC	\$1,046,016.00	
49	TAO CF/1B/CMP	C22328	32	REPLACEMENT OF 8 CARGO HANDLING EQUIPMENT AND 7 OFF-ROAD EQUIPMENT	SA RECYCLING LLC	\$574,710.00	

**South Coast AQMD
Contract Activity Report
July 1, 2022 - June 30, 2023**

DEPT ID	DEPT NAME	CONTRACT NUMBER	FUND CODE	DESCRIPTION	VENDOR NAME	CONTRACT AMOUNT	FOOTNOTE
44	TECHNOLOGY ADVANCEMENT OFFICE	C22329	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	FASTRACK RENTALS, INC.	\$245,547.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22330	32	REPLACEMENT OF 23 OFF-ROAD ENGINES	MCMINN EQUIPMENT RENTAL & LEASING, INC.	\$6,555,310.00	
49	TAO CF/1B/CMP	C22331	32	REPLACEMENT OF 1 AND REPOWER OF 14 OFF-ROAD EQUIPMENT	PEED EQUIPMENT COMPANY	\$5,666,160.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22334	81	PROP 1B TRUCK REPLACEMENT PROGRAM	LATIN AMERICAN CARRIERS, INC.	\$100,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22335	81	PROP 1B TRUCK REPLACEMENT PROGRAM	VEGA EXPRESS TRUCKING LLC	\$200,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22340	32	REPLACEMENT OF 3 OFF-ROAD EQUIPMENT	STICE CO INC	\$352,522.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22341	79	REPLACE 1 ON-ROAD CLASS 8 DRAYAGE TRUCK	JONGHO LEE	\$85,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22342	79	REPLACEMENT OF 1 ON-ROAD CLASS 8 DRAYAGE TRUCK	ANGEL GEOVANNI GARCIA	\$85,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22343	79	REPLACE 1 ON-ROAD CLASS 8 DRAYAGE TRUCK	PY TRUCKING INC	\$85,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22344	81	PROP 1B TRUCK REPLACEMENT PROGRAM	JDE TRANSPORTATION INC	\$300,000.00	
27	INFORMATION MANAGEMENT	C22346	01	PHONE SYSTEM MAINTENANCE	INSIGHT PUBLIC SECTOR, INC	\$777,944.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22347	32	REPLACEMENT OF 2 OFF-ROAD EQUIPMENT	VENTURA TRANSFER COMPANY	\$502,193.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22352	32	REPLACEMENT OF 1 DUAL-ENGINE OFF-ROAD EQUIPMENT	JAMES MCMINN, INC.	\$1,645,020.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22355	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	BNSF RAILWAY COMPANY	\$81,104.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22357	32	REPLACEMENT OF 2 OFF-ROAD EQUIPMENT	DORSEY FAMILY GROVES, LLC	\$155,170.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22358	32	REPLACEMENT OF 2 OFF-ROAD EQUIPMENT	A J ZIMMER CONSTRUCTION INC	\$270,824.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22359	32	REPLACEMENT OF 2 OFF-ROAD EQUIPMENT	LA QUINTA DATE GROWERS, L.P.	\$64,435.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22360	32	REPLACEMENT OF 63 OFF-ROAD EQUIPMENT	TGI EQUIPMENT CORPORATION	\$10,424,532.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22362	32	REPLACEMENT OF 2 OFF-ROAD EQUIPMENT	WEST COAST TURF	\$144,682.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22363	32	REPLACEMENT OF 2 OFF-ROAD EQUIPMENT	C&C SCRAP SERVICES, INC	\$275,446.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22365	32	REPLACEMENT OF 10 OFF-ROAD EQUIPMENT	COMMERCIAL COATING CO INC	\$232,491.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22366	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	DESERT EMPIRE MOBILE HOMES	\$122,409.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22367	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	DONALD J ARIAS	\$57,117.00	

**South Coast AQMD
Contract Activity Report
July 1, 2022 - June 30, 2023**

DEPT ID	DEPT NAME	CONTRACT NUMBER	FUND CODE	DESCRIPTION	VENDOR NAME	CONTRACT AMOUNT	FOOTNOTE
44	TECHNOLOGY ADVANCEMENT OFFICE	C22368	32	REPLACEMENT OF 2 OFF-ROAD EQUIPMENT	FISCHER, INC	\$214,775.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22369	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	SO CALIFORNIA REGIONAL RAIL AUTHORITY	\$318,142.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22371	32	REPLACEMENT OF 2 OFF-ROAD EQUIPMENT	EAGLE ROCK AGGREGATES INC	\$97,957.00	
46	MONITORING AND ANALYSIS	C22375	01	CONDUCT CALIBRATION OF METEOROLOGICAL DEVICES IN AB 617 COMMUNITIES	TECHNICAL AND BUSINESS SYSTEMS	\$50,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22376	32	REPLACEMENT OF 20 OFF-ROAD EQUIPMENT	GLESS RANCH, INC	\$1,101,611.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22377	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	GUILLERMO GONZALES	\$148,269.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22378	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	JUAN ANTONIO RIOS LUNA	\$111,797.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22379	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	NOE ESPINOZA	\$51,720.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22380	32	REPLACEMENT OF 3 OFF-ROAD EQUIPMENT	JUNIOR ENTERPRISES, LLC	\$750,240.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22381	32	REPLACEMENT OF 2 OFF-ROAD EQUIPMENT	KIP CONSTRUCTION SERVICES INC	\$291,350.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22382	32	REPLACEMENT OF 6 OFF-ROAD EQUIPMENT	MARTIN MORA	\$491,381.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22383	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	NATURES BEST FARMS INC	\$151,371.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22385	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	CAL-COAST CONSTRUCTION SPECIALISTS, INC	\$127,339.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22386	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	NICKOLAS EUGENE NUCIFORO	\$141,530.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22389	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	CITY OF HAWAIIAN GARDENS	\$15,807.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22390	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	D.L. WIEST ENTERPRISES, INC.	\$690,130.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22391	32	REPLACEMENT OF 2 OFF-ROAD EQUIPMENT	DOMENIGONI BROTHERS RANCH LP	\$262,318.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22393	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	WILLIAMS HEAVY EQUIPMENT RENTAL INC	\$81,278.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22396	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	GREEN HORSE POLO PARK OWNERS ASSOCIATION	\$101,721.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22398	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	GREG ANDERSON	\$97,489.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22401	32	REPLACEMENT OF 3 OFF-ROAD EQUIPMENT	KRAMAR'S IRON & METAL INC	\$226,067.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22402	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	KATHLEEN A WEBER INC	\$58,621.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22403	32	OPERATION OF 2 OFF-ROAD EQUIPMENT	GREYSON HEAVY EQUIPMENT RENTALS	\$0.00	1

**South Coast AQMD
Contract Activity Report
July 1, 2022 - June 30, 2023**

DEPT ID	DEPT NAME	CONTRACT NUMBER	FUND CODE	DESCRIPTION	VENDOR NAME	CONTRACT AMOUNT	FOOTNOTE
44	TECHNOLOGY ADVANCEMENT OFFICE	C22404	32	CONSTRUCTION AND OPERATION OF 2 NEW E/V VEHICLE CHARGING STATIONS	WATTEV INC	\$3,356,158.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22405	79	REPLACEMENT OF 1 ON-ROAD CLASS 8 DRAYAGE TRUCK	CHANG HWAN LEE	\$85,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22406	32	REPLACEMENT OF 7 OFF-ROAD EQUIPMENT	YUSEN TERMINALS INC	\$82,800.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22407	32	OPERATION OF 4 OFF-ROAD EQUIPMENT	DICE GROWERS, LLC	\$0.00	1
16	ADMINISTRATIVE & HUMAN RESOURCES	C22416	01	LANDSCAPE & TREE MAINTENANCE	TROPICAL PLAZA NURSERY INC	\$394,713.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22417	32	REPLACEMENT OF 1 OFF ROAD EQUIPMENT	WHITTIER FERTILIZER CO.	\$52,875.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22418	32	REPLACEMENT OF 1 OFF-RAOD EQUIPMENT	OAK GLEN WINERY LLC	\$75,779.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22419	32	REPLACEMENT OF 3 OFF-ROAD EQUIPMENT	WEYERHAEUSER NR COMPANY	\$322,995.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22422	32	REPLACEMENT OF 1 OFF-RAOD EQUIPMENT	LA QUINTA COUNTRY CLUB	\$70,985.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C23019	01	SECURITY GUARD SERVICES AT DIAMOND BAR HEADQUARTERS	GSSI, INC	\$1,966,145.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23031	32	REPLACEMENT OF 1 OFF-RAOD EQUIPMENT	BOSCH DAIRY #2	\$209,747.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23038	32	REPLACEMENT OF 1 OFF-RAOD EQUIPMENT	TOTAL TERMINALS INTERNATIONAL, LLC	\$639,391.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23044	32	REPLACEMENT OF 1 OFF-RAOD EQUIPMENT	LBCT LLC	\$20,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23045	32	REPLACEMENT OF 14 OFF-RAOD EQUIPMENT	NATIONAL DISTRIBUTION CENTERS LLC	\$628,432.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23047	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	PRO-ORGANIC FARMS LLC	\$233,171.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23051	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	ALBERTO RODRIGUEZ CRUZ	\$77,154.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23052	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	AGRISCAPE, INC	\$141,921.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23053	32	REPLACEMENT OF 2 OFF-ROAD EQUIPMENT	ALEJANDRO GALINDO	\$118,330.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23054	32	REPLACEMENT OF 2 OFF-ROAD EQUIPMENT	ANTONIO RAMIREZ	\$304,140.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23055	32	REPLACEMENT OF 5 OFF-ROAD EQUIPMENT	ANTHONY VINEYARDS, INC.	\$365,225.00	
49	TAO CF/1B/CMP	C23056	32	REPLACEMENT OF 4 OFF-ROAD EQUIPMENT	BOERSMA DAIRY	\$396,723.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23057	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	AUDENCIO MARTINEZ ESPINOZA	\$198,365.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23058	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	BRITO RANCHES LP	\$71,700.00	

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44	TECHNOLOGY ADVANCEMENT OFFICE	C23062	77	CONSTRUCTION AND OPERATION OF 1 RENEWABLE NATURAL GAS FILLING STATION	EQUILON ENTERPRISES LLC	\$800,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23064	79	REPLACEMENT OF 4 ON-ROAD CLASS 8 WASTE HAULERS	WASTE MANAGEMENT OF CALIFORNIA INC	\$288,832.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23065	79	REPLACEMENT OF 13 ON-ROAD CLASS 8 DRAYAGE TRUCKS	PACIFIC EXPRESSWAY INC	\$1,105,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23066	79	REPLACEMENT OF 2 ON-ROAD CLASS 8 DRAYAGE TRUCKS	TRICON TRANSPORTATION, INC.	\$170,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23067	79	REPLACEMENT OF 3 ON-ROAD WASTE HAULERS	USA WASTE OF CALIFORNIA INC	\$216,624.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23070	79	REPLACEMENT OF 1 ON-ROAD CLASS 7 DRAYAGE TRUCK	ALEJANDRO MELENDEZ	\$46,789.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23073	32	REPLACEMENT OF 2 ON-ROAD EQUIPMENT	TST, INC	\$121,992.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23079	79	REPLACEMENT OF 1 ON-ROAD CLASS 8 DRAYAGE TRUCKS	DAN LY LLC	\$85,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23080	79	REPLACEMENT OF 1 ON-ROAD CLASS 8 DRAYAGE TRUCK	LUNA LOGISTICS INC	\$85,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23096	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	ROCKVIEW DAIRIES, INC.	\$171,042.00	
50	ENGINEERING AND PERMITTING	C23099	01	PROVIDE CONSULTING SERVICES	CASTLE ENVIRONMENTAL CONSULTING, LLC	\$50,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23101	81	REPLACEMENT OF 2 HEAVY-DUTY DIESEL TRUCKS WITH 2 LOW NO _x CNG-POWERED HEAVY-DUTY TRUCKS	KRD LOGISTICS INC.	\$200,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23108	79	REPLACE 12 ON-ROAD CLASS 8 FREIGHT TRUCKS	MASHBURN TRANSPORTATION SERVICES INC	\$602,352.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23112	79	REPLACEMENT OF 1 ON-ROAD CLASS 8 FREIGHT TRUCK	SOUTHERN COUNTIES TERMINALS INC	\$200,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23113	79	REPLACEMENT OF 3 ON-ROAD CLASS 8 TRUC	NOVA EXPRESS INC.	\$600,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23117	81	REPLACE 4 HEAVY-DUTY DIESEL TRUCKS WITH 4 NEW OPTIONAL LOW NOX CNG-POWERED HEAVY-DUTY TRUCKS	BASIC FIBRES, INC	\$400,000.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C23118	01	MASTER LEASE AGREEMENT OF FLEET VEHICLES	ENTERPRISE FM TRUST	\$0.00	1
17	CLERK OF THE BOARDS	C23121	01	HEARING BOARD LITIGATION/LEGAL REPRESENTATION	STRUMWASSER & WOOCHEER LLP	\$125,000.00	
04	FINANCE/MSRC	C23126	22,23	AUDIT OF AB 2766 FEE REVENUE RECIPIENTS FOR FISCAL YEARS 2019-20 AND 2020-21	SIMPSON & SIMPSON, CPAs	\$123,250.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23127	79	REPLACEMENT OF 27 ON-ROAD WASTE HAULERS	CALIFORNIA WASTE SOLUTIONS, INC	\$1,217,685.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23131	75	PURCHASE AND DEPLOYMENT OF PORTABLE AIR CLEANERS INTO THE RED CROSS WILDFIRE SMOKE CLEAN AIR CENTERS	IQAIR FOUNDATION	\$231,250.00	

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44	TECHNOLOGY ADVANCEMENT OFFICE	C23136	32	OPERATE 1 REPLACEMENT OFF-ROAD EQUIPMENT	RICHARD LOPEZ CONSTRUCTION INC	\$0.00	1
44	TECHNOLOGY ADVANCEMENT OFFICE	C23140	32	REPLACEMENT OF 2 HEAVY DUTY VEHICLES	AMERICAN PACIFIC FORWARDERS INC	\$320,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23142	77	REPLACEMENT OF 1 ON-ROAD EQUIPMENT	CITY OF LONG BEACH	\$24,618.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23150	32	REPLACEMENT OF HEAVY DUTY VEHICLES	GLOBAL EXPRESS TRUCKING CORP	\$480,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23154	32	REPLACEMENT OF 1 HEAVY DUTY VEHICLE FOR A LOW NO _x HEAVY-DUTY VEHICLE	LUNA LOGISTICS INC	\$99,353.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23158	32	COMMERCIAL E-LAWN & GARDEN REPLACEMENT PROGRAM	ALAN'S LAWN & GARDEN CENTER INC	\$0.00	1
44	TECHNOLOGY ADVANCEMENT OFFICE	C23159	32,17	COMMERCIAL E-LAWN & GARDEN REPLACEMENT PROGRAM	LA VERNE POWER EQUIPMENT, INC	\$0.00	1
44	TECHNOLOGY ADVANCEMENT OFFICE	C23161	32,17	COMMERCIAL E-LAWN & GARDEN REPLACEMENT PROGRAM	B&M LAWN AND GARDEN INC	\$0.00	1
16	ADMINISTRATIVE & HUMAN RESOURCES	C23167	01	5 YEAR LEASE OF 1 TOYOTA COROLLA HYBRID	ENTERPRISE FM TRUST	\$49,574.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C23168	01	5 YEAR LEASE TOYOTA COROLLA HYBRID	ENTERPRISE FM TRUST	\$46,997.11	
16	ADMINISTRATIVE & HUMAN RESOURCES	C23170	01	5 YEAR LEASE OF TOYOTA COROLLA HYBRID	ENTERPRISE FM TRUST	\$49,774.09	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23173	79	REPLACEMENT OF 2 ON-ROAD CLASS 8 DRAYAGE TRUCKS	PACIFIC GREEN TRUCKING INC	\$170,000.00	
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C23179	77	CAP HEXAVALENT CHROMIUM REDUCTION PROJECT	QCP ENTERPRISES	\$112,806.00	
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C23182	77	CAPS HEXAVALENT CHROMIUM REDUCATION PROJECT	PALM SPRINGS PLATING	\$188,914.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C23184	01	5 YEAR LEASE OF 2 TOYOTA COROLLA HYBRIDS	ENTERPRISE FM TRUST	\$80,114.40	
04	FINANCE	C23186	01	INDEPENDENT AUDIT SERVICES	THE PUN GROUP LLP	\$170,000.00	
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C23188	77	HEXAVALENT CHROMIUM REDUCTION PROGRAM	STUTZMAN PLATING	\$217,734.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C23190	01	5 YEAR LEASE OF TOYOTA COROLLA HYBRIDS	ENTERPRISE FM TRUST	\$41,852.33	
16	ADMINISTRATIVE & HUMAN RESOURCES	C23191	01	5 YEAR LEASE OF TOYOTA COROLLA HYBRIDS	ENTERPRISE FM TRUST	\$47,149.57	
16	ADMINISTRATIVE & HUMAN RESOURCES	C23192	01	LEASE 2 TOYOTA COROLLA HYBRIDS	ENTERPRISE FM TRUST	\$82,918.73	
16	ADMINISTRATIVE & HUMAN RESOURCES	C23193	01	5 YEAR LEASE OF TOYOTA COROLLA HYBRIDS	ENTERPRISE FM TRUST	\$47,268.14	
16	ADMINISTRATIVE & HUMAN RESOURCES	C23194	01	5 YEAR LEASE OF TOYOTA COROLLA HYBRIDS	ENTERPRISE FM TRUST	\$81,278.50	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22199	80	PURCHASE OF 2 ELECTRIC SCHOOL BUSES WITH ASSOCIATED INFRASTRUCTURE	BALDWIN PARK UNIFIED SCHOOL DISTRICT	\$420,000.00	

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44	TECHNOLOGY ADVANCEMENT OFFICE	G22201	80	PURCHASE OF 4 ELECTRIC SCHOOL BUSES	BONITA UNIFIED SCHOOL DISTRICT	\$1,560,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22202	80	PURCHASE OF 1 ELECTRIC SCHOOL BUS	BUENA PARK SCHOOL DISTRICT	\$390,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22203	80	PURCHASE OF 7 CNG SCHOOL BUSES	CAPISTRANO UNIFIED SCHOOL DISTRICT	\$1,435,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22204	80	REPLACEMENT OF 2 SCHOOL BUSES	CENTRALIA SCHOOL DISTRICT	\$420,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22206	80	PURCHASE 4 ELECTRIC SCHOOL BUSES	COACHELLA VALLEY UNIFIED SCHOOL DISTRICT	\$1,600,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22207	80	PURCH 3 CNG SCHOOL BUSES	COLTON JOINT UNIFIED SCHOOL DISTRICT	\$660,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22208	80	REPLACEMENT OF 2 SCHOOL BUSES	DESERT SANDS UNIFIED SCHOOL DISTRICT	\$410,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22209	80	REPLACEMENT OF 1 SCHOOL BUS	EL MONTE UNION HIGH SCHOOL DISTRICT	\$220,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22210	80	PURCHASE 5 CNG SCHOOL BUSES AND 1 ELECTRIC SCHOOL BUS WITH ASSOCIATED INFRASTRUCTURE	FONTANA UNIFIED SCHOOL DISTRICT	\$1,490,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22211	80	PURCHASE OF 2 CNG SCHOOL BUSES	FOUNTAIN VALLEY SCHOOL DISTRICT	\$410,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22212	80	REPLACEMENT OF 2 SCHOOL BUSES	FULLERTON JOINT UNION HIGH SCHOOL DIST	\$440,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22213	80	REPLACEMENT OF 2 SCHOOL BUSES WITH LOW EMISSION BUSES	FULLERTON SCHOOL DISTRICT	\$310,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22215	80	PURCHASE OF 7 CNG SCHOOL BUSES	HEMET UNIFIED SCHOOL DISTRICT	\$1,540,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22216	80	REPLACEMENT OF 2 SCHOOL BUSES	HUNTINGTON BEACH CITY SCHOOL DISTRICT	\$410,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22218	80	PURCHASE OF 2 CNG SCHOOL BUSES	LA HABRA CITY SCHOOL DISTRICT	\$410,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22219	80	PURCHASE OF 7 CNG SCHOOL BUSES	LAKE ELSINORE UNIFIED SCHOOL DISTRICT	\$1,540,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22220	80	REPLACEMENT OF 2 SCHOOL BUSES WITH CNG BUSES	LOS ALAMITOS UNIFIED SCHOOL DISTRICT	\$410,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22221	80	PURCHASE OF 2 ELECTRIC SCHOOL BUSES	MONROVIA UNIFIED SCHOOL DISTRICT	\$780,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22222	80	REPLACEMENT OF 6 SCHOOL BUSES	MONTEBELLO UNIFIED SCHOOL DISTRICT	\$2,340,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22223	80	PURCHASE OF 4 ELECTRIC SCHOOL BUSES	MORENO VALLEY UNIFIED SCHOOL DISTRICT	\$1,560,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22225	80	REPLACEMENT OF 3 SCHOOL BUSES	NEWHALL SCHOOL DISTRICT	\$666,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22226	80	REPLACEMENT OF 2 SCHOOL BUSES	NEWPORT MESA UNIFIED SCHOOL DISTRICT	\$410,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22227	80	REPLACEMENT OF 8 SCHOOL BUSES	NORWALK-LA MIRADA UNIFIED SCHOOL DIST	\$1,680,000.00	

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44	TECHNOLOGY ADVANCEMENT OFFICE	G22229	80	PURCHASE OF 3 ELECTRIC SCHOOL BUSES	ONTARIO-MONTCLAIR SCHOOL DISTRICT	\$1,170,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22230	80	REPLACEMENT OF 2 SCHOOL BUSES	ORANGE UNIFIED SCHOOL DISTRICT	\$420,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22232	80	REPLACEMENT OF 6 SCHOOL BUSES	REDLANDS UNIFIED SCHOOL DISTRICT	\$2,340,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22234	80	PURCHASE 2 PROPANE SCHOOL BUSES	SAUGUS UNION SCHOOL DISTRICT	\$310,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22235	80	REPLACEMENT OF 2 SCHOOL BUSES	SULPHUR SPRINGS SCHOOL DISTRICT	\$444,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22236	80	REPLACEMENT OF 2 SCHOOL BUSES	TEMECULA VALLEY UNIFIED SCHOOL DISTRICT	\$780,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22237	80	PURCHASE OF 5 CNG SCHOOL BUSES	TORRANCE UNIFIED SCHOOL DISTRICT	\$1,100,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22238	80	PURCHASE 1 CNG SCHOOL BUS	WALNUT VALLEY UNIFIED SCHOOL DISTRICT	\$205,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22239	80	SCHOOL BUS REPLACEMENT	WESTMINSTER SCHOOL DISTRICT	\$320,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22240	80	PURCHAS OF 4 ELECTRIC SCHOOL BUSES	WHITTIER UNION HIGH SCHOOL DISTRICT	\$840,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22241	80	PURCHASE OF 14 ELECTRIC SCH BUSES	WM S HART UNION HIGH SCHOOL DISTRICT	\$3,108,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22268	80	REPLACEMENT OF 1 CNG TANK ON SCHOOL BUS	CHAFFEY JOINT UNION HIGH SCHOOL DISTRICT	\$20,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22338	80	REPLACEMENT OF 6 CNG TANKS ON SCHOOL BUSES	OCEAN VIEW SCHOOL DISTRICT	\$120,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22339	80	REPLACEMENT OF 6 CNG TANKS ON SCHOOL BUSES	FONTANA UNIFIED SCHOOL DISTRICT	\$120,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22353	80	REPLACEMENT OF 1 CNG TANK ON SCH BUS	ALTA LOMA SCHOOL DISTRICT	\$20,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G22354	80	REPLACEMENT OF 1 SCHOOL BUS	REDLANDS UNIFIED SCHOOL DISTRICT	\$20,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G23050	80	REPLACEMENT OF 2 CNG TANKS ON SCHOOL BUSES	DOWNEY UNIFIED SCHOOL DISTRICT	\$40,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G23061	17	REPLACEMENT OF 38 DIESEL SCHOOL BUSES	MORENO VALLEY UNIFIED SCHOOL DISTRICT	\$4,282,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	G23063	80	TANK REPLACEMENT ON 2 CNG SCHOOL BUSES	ORANGE UNIFIED SCHOOL DISTRICT	\$40,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	MS18180	23	VEHICLE MAINTENANCE FACILITY MODIFICATIONS AND TECHNICIAN TRAINING	OMNITRANS	\$83,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	MS18181	23	CONSTRUCTION OF HYDROGEN FUELING STATION	SAN BERNARDINO COUNTY TRANSPORTATION	\$1,662,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	MS18182	23	INSTALL PUBLICLY ACCESSIBLE HYDROGEN FUELING STATION	AIR PRODUCTS AND CHEMICALS, INC	\$1,000,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	MS18183	23	INSTALL PUBLICLY ACCESSIBLE HYDROGEN FUELING STATION	NIKOLA TA HRS 1 LLC	\$1,660,000.00	

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44	TECHNOLOGY ADVANCEMENT OFFICE	MS21009	23	DEPLOY 12 ZERO-EMISSION YARD TRACTORS	ITS TECHNOLOGIES & LOGISTICS, LLC	\$1,686,900.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	MS21016	23	PROCURE 2 INTEGRATED POWER CENTERS AND 4 MEGA CHARGERS	RYDER INTEGRATED LOGISTICS INC	\$3,169,746.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	MS21025	23	INSTALL E/V CHARGING INFRASTRUCTURE	COSTCO WHOLESALE CORPORATION	\$160,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	MS24001	23	PROVIDE CLEAN FUEL TRANSIT SERVICE TO DODGER STADIUM	LOS ANGELES COUNTY METROPOLITAN	\$1,200,248.00	
					Subtotal	\$140,183,444.87	
Competitive - Executive Officer Approved							
44	TECHNOLOGY ADVANCEMENT OFFICE	C22321	59	VIP - SOUTH COAST AQMD PARTICIPATING DEALERSHIP IN VOUCHER INCENTIVE PROGRAM	COACHWEST LUXURY & PERFORMANCE MOTORCARS	\$0.00	1
44	TECHNOLOGY ADVANCEMENT OFFICE	C22408	32	OPERATION OF 1 OFF-ROAD EQUIPMENT	JUAN GARCIA CISNEROS	\$0.00	1
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C23078	01	CONSULTING SERVICES (ZORIK PIRVEYSIAN)	INTEGRA ENVIRONMENTAL CONSULTING	\$100,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23083	32	OPERATION OF 1 OFF-ROAD EQUIPMENT	MARVO HOLSTEINS	\$0.00	1
44	TECHNOLOGY ADVANCEMENT OFFICE	C23094	77	OPERATION OF 11 OFF-ROAD AGRICULTURAL EQUIPMENT	ANTHONY VINEYARDS, INC.	\$0.00	1
50	ENGINEERING AND PERMITTING	C23098	01	PROVIDE CONSULTING SERVICES	WILLIAM DANIEL WALTERS	\$50,000.00	
					Subtotal	\$150,000.00	
Sole Source - Board Approved							
44	TECHNOLOGY ADVANCEMENT OFFICE	C22082	31	HIGH FLOW BUS FUELING PROTOCOL DEVELOPMENT	FRONTIER ENERGY INC	\$25,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22108	67	OUTREACH FOR JETSI PILOT PROG	COALITION FOR CLEAN AIR	\$99,553.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22125	67	MANAGE DATA COLLECTION, FLEET ANALYSIS AND REPORTING ON THE JETSI PILOT PROJECT FOR ALL BASELINE AND ZERO EMISSION TRUCKS DEPLOYED IN THE PROJECT	RICARDO INC	\$1,351,924.00	
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C22135	01	COMMUNITY-BASED OUTREACH AND TRAINING REGARDING AIR POLLUTION	DESERT HEALTHCARE DISTRICT	\$27,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE/MSRC	C22177	67,23	DEPLOYMENT OF 50 BATTERY ELECTRIC TRUCKS AND CHARGING INFRASTRUCTURE	DAIMLER TRUCKS NORTH AMERICA LLC	\$15,918,593.00	
44	TECHNOLOGY ADVANCEMENT OFFICE/MSRC	C22247	67,23	DEPLOY 50 BATTERY ELECTRIC CLASS 8 TRUCKS	NFI INTERACTIVE LOGISTICS LLC	\$23,108,129.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22284	67	CALIFORNIA JOINT ELECTRIC TRUCK SCALING INITIATIVE - ZERO-EMISSION DRAYAGE TRUCK AND INFRASTRUCTURE PILOT PROJECT	GLADSTEIN, NEANDROSS AND ASSOCIATES, LLC	\$266,133.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22337	83	DEVELOP, INSTALL AND DEMONSTRATE RETROFIT TECHNOLOGIES ON 2 OCEAN-GOING VESSELS	MEDITERRANEAN SHIPPING COMPANY (USA) INC	\$11,174,000.00	

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44	TECHNOLOGY ADVANCEMENT OFFICE	C22409	01	TESTING OF A NON-PFAS FUME SUPPRESSANT IN CHROME PLATING OPERATIONS	ALLIANCE TECHNICAL GROUP LLC	\$60,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23037	32	REPLACEMENT OF 2 OFF-ROAD EQUIPMENT	POMONA SCRAP METAL INC	\$758,011.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23039	17	REPLACE 1 ELECTRIC FREIGHT LINE-HAUL LOCOMOTIVE TO A ZERO-EMISSION FREIGHT LINE-HAUL LOCOMOTIVE WITH SUPPORTING CHARGING INFRASTRUCTURE	BNSF RAILWAY COMPANY	\$4,967,000.00	
46	MONITORING AND ANALYSIS	C23042	01	EXPANDED MOMA CALIBRATION TOOL	AEROQUAL INC	\$60,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23059	31	STUDY OF EMISSIONS AND AIR QUALITY IMPACT FROM GOODS MOVEMENT OPERATIONS IN SOUTHERN CALIFORNIA COMMUNITIES	UNIVERSITY OF CALIFORNIA RIVERSIDE	\$500,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23071	31	RENEWAL OF MEMBERSHIP IN CALIFORNIA FUEL CELL PARTNERSHIP	FRONTIER ENERGY INC	\$40,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C23102	01	AB617 CO-LEAD FOR THE SOUTH LOS ANGELES COMMUNITY EMISSIONS REDUCTION PLAN	PHYSICIANS FOR SOCIAL RESPONSIBILITY	\$22,200.15	
01	DISTRICT GENERAL	C23214	01	REPLACEMENT OF 2 POLLUTE CONTROL UNITS ON CAFETERIA ROOF	AIR CLEANING TECHNOLOGY	\$445,000.00	
					Subtotal	\$58,822,543.15	
Sole Source - Executive Officer Approved							
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C22395	01	IDENTIFY BEST PRACTICES FOR ESTIMATING COSTS FOR ZERO-EMISSION FUELING INFRASTRUCTURE RELATED TO THE 2022 AQMP, PORTS AND RAILYARD ISRS	INDUSTRIAL ECONOMICS INCORPORATED	\$51,297.60	
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C22397	01	EMISSION REDUCTIONS FOR OGV	SHUK WAI FRED A FUNG	\$10,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C23029	01	LICENSE AGREEMENT TO USE ARTWORK	FAVIANNA RODRIGUEZ	\$2,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C23030	01	ENVIRONMENTAL JUSTICE CONFERENCE, WHOVA LICENCE AND SERVICES AGREEMENT	WHOVA, INC.	\$4,299.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C23033	01	WEST INLAND EMPIRE EMPLOYMENT RELATIONS CONSORTIUM MEMBERSHIP	LIEBERT CASSIDY WHITMORE	\$4,920.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C23035	01	HEALTH INSURANCE BROKERAGE SERVICES	ALLIANT INSURANCE SERVICES INC	\$78,000.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C23060	01	LEASE 2 HYUNDAI IONIQ EVS	PUENTE HILLS HYUNDAI	\$88,586.50	
43	M&A-AQ-SPEC	C23076	01	AIRSENSOR DATA ACCESS UPGRADE	DESERT RESEARCH INSTITUTE	\$9,500.00	
08	LEGAL	C23084	01	PROVIDE LEGAL ADVICE AND COUNSEL	ATKINSON, ANDELSON, LOYA, RUUD & ROMO	\$5,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23104	01	REMOVAL OF CNG, FUEL CELL AND FAST CHARGER EQUIPMENT`	COMPRESSION SOURCE INC	\$0.00	1
35	LEGISLATIVE & PUBLIC AFFAIRS	C23111	01	SUBSCRIPTION TO CAPITOL TRACK	WAVELENGTH AUTOMATION INC	\$2,844.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C23132	01	VENUE AND CATERING SERVICES FOR 9TH ANNUAL ENVIORNMENTAL JUSTICE CONFERENCE	RIVERSIDE CONVENTION CENTER	\$45,000.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C23138	01	LEGAL SERVICES FOR IMMIGRATION	FISHER & PHILLIPS, LLP	\$20,000.00	

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26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C23143	01	CONSULTING SERVICES FOR PRDAS	SHAHABEDIN DABIRIAN	\$97,500.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C23145	01	INVESTIGATIVE SERVICES	DEBRA L REILLY, A PROFESSIONAL LAW	\$15,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C23216	01	EDUCATION AND OUTREACH SERVICES FOR COMMERCIAL LAWN AND GARDEN EXCHANGE PROGRAM	TORRES CONSULTING	\$95,000.00	
					Subtotal	\$528,947.10	
II. OTHER							
Board Assistant							
Board Administrative Committee/Executive Officer Approved							
02	GOVERNING BOARD	C23001	01	BOARD ASSISTANT SERVICES FOR BEN BENOIT	RUTHANNE TAYLOR BERGER	\$74,000.04	
02	GOVERNING BOARD	C23003	01	BOARD ASSISTANT SERVICES FOR ANDREW DO	CHRIS WANGSAPORN	\$39,624.00	
02	GOVERNING BOARD	C23000	01	BOARD ASSISTANT SERVICES FOR BEN BENOIT	TRICIA ALMIRON	\$22,435.92	
02	GOVERNING BOARD	C23002	01	BOARD ASSISTANT SERVICES FOR VERONICA PADILLA-CAMPOS	AMY J WONG	\$62,564.00	
02	GOVERNING BOARD	C23004	01	BOARD ASSISTANT SERVICES FOR LARRY MCCALLON	RONALD KETCHAM	\$45,045.96	
02	GOVERNING BOARD	C23005	01	BOARD ASSISTANT SERVICES FOR BEN BENOIT	THOMAS ALAN GROSS	\$22,435.92	
02	GOVERNING BOARD	C23006	01	BOARD ASSISTANT SERVICES FOR VANESSA DELGADO	MARIA TERESA ACOSTA	\$48,000.00	
02	GOVERNING BOARD	C23007	01	BOARD ASSISTANT SERVICES FOR VANESSA DELGADO	SANDRA HERNANDEZ	\$33,000.00	
02	GOVERNING BOARD	C23008	01	BOARD ASSISTANT SERVICES FOR VANESSA DELGADO	CRISTIAN RIESGO	\$12,000.00	
02	GOVERNING BOARD	C23009	01	BOARD ASSISTANT SERVICES FOR GIDEON KRACOV	DESTINY RODRIGUEZ	\$75,000.00	
02	GOVERNING BOARD	C23010	01	BOARD ASSISTANT SERVICES FOR VANESSA DELGADO	ALISA COTA	\$25,872.00	
02	GOVERNING BOARD	C23011	01	BOARD ASSISTANT SERVICES FOR GIDEON KRACOV	ROSS BENJAMIN ZELEN	\$27,604.92	
02	GOVERNING BOARD	C23012	01	BOARD ASSISTANCE SERVICES FOR JANICE RUTHERFORD	COUNTY OF SAN BERNARDINO [MARK TAYLOR]	\$34,094.04	
02	GOVERNING BOARD	C23013	01	BOARD ASSISTANCE SERVICES FOR JANICE RUTHERFORD	DEBRA S MENDELSON	\$32,974.92	
02	GOVERNING BOARD	C23015	01	BOARD ASSISTANT SERVICES FOR NITHYA RAMAN	JOSHUA JAMES NUNI	\$4,611.48	
02	GOVERNING BOARD	C23016	01	BOARD ASSISTANT SERVICES FOR NITHYA RAMAN	JACKSON GUZE	\$39,433.44	
02	GOVERNING BOARD	C23017	01	BOARD ASSISTANT SERVICES FOR SHEILA KUEHL	LORAIN LUNDQUIST	\$54,054.96	
02	GOVERNING BOARD	C23018	01	BOARD ASSISTANT SERVICES FOR V. MANUEL PEREZ	GUILLERMO GONZALEZ	\$44,044.92	
02	GOVERNING BOARD	C23020	01	BOARD ASSISTANT SERVICES FOR MICHAEL A. CACCIOTTI	WILLIAM J KELLY	\$12,000.00	
02	GOVERNING BOARD	C23021	01	BOARD ASSISTANT SERVICES FOR CARLOS RODRIGUEZ	MATTHEW AUGUST HOLDER	\$61,563.00	
02	GOVERNING BOARD	C23022	01	BOARD ASSISTANT SERVICES FOR MICHAEL A. CACCIOTTI	WILLIAM GLAZIER	\$6,000.00	
02	GOVERNING BOARD	C23023	01	BOARD ASSISTANT SERVICES FOR MICHAEL A. CACCIOTTI	WESLEY REUTIMANN	\$6,000.00	

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02	GOVERNING BOARD	C23024	01	BOARD ASSISTANT SERVICES FOR MICHAEL A. CACCIOTTI	SHO TAY	\$5,400.00	
02	GOVERNING BOARD	C23025	01	BOARD ASSISTANT SERVICES FOR MICHAEL A. CACCIOTTI	BENJAMIN S WONG	\$14,400.00	
02	GOVERNING BOARD	C23026	01	BOARD ASSISTANT SERVICES FOR MICHAEL A. CACCIOTTI	TIMOTHY PHILLIP SANDOVAL	\$7,380.00	
02	GOVERNING BOARD	C23027	01	BOARD ASSISTANT SERVICES FOR REX RICHARDSON	CITY OF LONG BEACH [PARKER HOUSON]	\$60,062.00	
02	GOVERNING BOARD	C23028	01	BOARD ASSISTANT SERVICES FOR MICHAEL A. CACCIOTTI	CHAWKINS COMMUNICATIONS INC	\$8,881.92	
02	GOVERNING BOARD	C23120	01	BOARD ASSISTANT SERVICES FOR CARLOS RODRIGUEZ	MARK D TAYLOR	\$30,781.50	
02	GOVERNING BOARD	C23135	01	BOARD ASSISTANT SERVICES FOR HOLLY J. MITCHELL	LORAIN LUNDQUIST	\$21,021.48	
02	GOVERNING BOARD	C23153	01	BOARD ASSISTANT SERVICES FOR LARRY MCCALLON	DEBRA S MENDELSON	\$10,071.10	
02	GOVERNING BOARD	C23176	01	BOARD ASSISTANT SERVICES FOR PATRICIA LOCK DAWSON	THOMAS ALAN GROSS	\$3,051.06	
02	GOVERNING BOARD	C23180	01	BOARD ASSISTANT SERVICES FOR JOSÉ LUIS SOLACHE	JACQUELINE VAZQUEZ	\$1,500.00	
02	GOVERNING BOARD	C23181	01	BOARD ASSISTANT SERVICES FOR JOSÉ LUIS SOLACHE	ENGINEERING RESULTS & ASSOCIATES INC	\$6,712.50	
02	GOVERNING BOARD	C23199	01	BOARD ASSISTANT SERVICES FOR JOSÉ LUIS SOLACHE	MARISELA SANTANA	\$15,910.58	
02	GOVERNING BOARD	C23205	01	BOARD ASSISTANT SERVICES FOR CURT HAGMAN	COUNTY OF SAN BERNARDINO [PETER ROGERS]	\$4,391.82	
02	GOVERNING BOARD	C23206	01	BOARD ASSISTANT SERVICES FOR PATRICIA LOCK DAWSON	ANDREW E SILVA	\$8,598.40	
02	GOVERNING BOARD	C23207	01	BOARD ASSISTANT SERVICES FOR CURT HAGMAN	COUNTY OF SAN BERNARDINO [MICHAEL MILLER]	\$9,972.15	
02	GOVERNING BOARD	C23210	01	BOARD ASSISTANT SERVICES FOR GIDEON KRACOV	ENGINEERING RESULTS & ASSOCIATES INC	\$5,000.00	
02	GOVERNING BOARD	C24011	01	BOARD ASSISTANT SERVICES FOR JOSÉ LUIS SOLACHE	MARISELA SANTANA	\$53,700.00	
02	GOVERNING BOARD	C24025	01	BOARD ASSISTANT SERVICES FOR MICHAEL A. CACCIOTTI	TIMOTHY PHILLIP SANDOVAL	\$13,380.00	
					Subtotal	\$1,062,574.03	
Board Assistant Modifications							
Board Administrative Committee/Executive Officer Approved							
02	GOVERNING BOARD	C23002	01	BOARD ASSISTANT SERVICES FOR VERONICA PADILLA-CAMPOS	AMY J WONG	\$1,309.05	
02	GOVERNING BOARD	C23007	01	BOARD ASSISTANT SERVICES FOR VANESSA DELGADO	SANDRA HERNANDEZ	\$1,000.00	
02	GOVERNING BOARD	C23009	01	BOARD ASSISTANT SERVICES FOR GIDEON KRACOV	DESTINY RODRIGUEZ	\$1,255.34	
02	GOVERNING BOARD	C23011	01	BOARD ASSISTANT SERVICES FOR GIDEON KRACOV	ROSS BENJAMIN ZELEN	\$1,762.15	
02	GOVERNING BOARD	C23011	01	BOARD ASSISTANT SERVICES FOR GIDEON KRACOV	ROSS BENJAMIN ZELEN	\$1,762.15	
02	GOVERNING BOARD	C23013	01	BOARD CONSULT FOR JANICE RUTHERFORD	DEBRA S MENDELSON	\$17,047.02	
02	GOVERNING BOARD	C23015	01	BOARD ASSISTANT SERVICES FOR NITHYA RAMAN	JOSHUA JAMES NUNI	\$3.90	
02	GOVERNING BOARD	C23015	01	BOARD ASSISTANT SERVICES FOR NITHYA RAMAN	JOSHUA JAMES NUNI	\$7.08	
02	GOVERNING BOARD	C23016	01	BOARD ASSISTANT SERVICES FOR NITHYA RAMAN	JACKSON GUZE	\$34.90	

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02	GOVERNING BOARD	C23016	01	BOARD ASSISTANT SERVICES FOR NITHYA RAMAN	JACKSON GUZE	\$581.40	
02	GOVERNING BOARD	C23018	01	OARD ASSISTANT SERVICES FOR V. MANUEL PEREZ	GUILLERMO GONZALEZ	\$5,890.45	
02	GOVERNING BOARD	C23018	01	OARD ASSISTANT SERVICES FOR V. MANUEL PEREZ	GUILLERMO GONZALEZ	\$50,711.11	
02	GOVERNING BOARD	C23020	01	BOARD ASSISTANT SERVICES FOR MICHAEL A. CACCIOTTI	WILLIAM J KELLY	\$6,002.10	
02	GOVERNING BOARD	C23022	01	BOARD ASSISTANT SERVICES FOR MICHAEL A. CACCIOTTI	WILLIAM GLAZIER	\$2,500.00	
02	GOVERNING BOARD	C23023	01	BOARD ASSISTANT SERVICES FOR MICHAEL A. CACCIOTTI	WESLEY REUTIMANN	\$2,500.00	
02	GOVERNING BOARD	C23024	01	BOARD ASSISTANT SERVICES FOR MICHAEL A. CACCIOTTI	SHO TAY	\$2,500.00	
02	GOVERNING BOARD	C23025	01	BOARD ASSISTANT SERVICES FOR MICHAEL A. CACCIOTTI	BENJAMIN S WONG	\$20,402.10	
02	GOVERNING BOARD	C23026	01	BOARD ASSISTANT SERVICES FOR MICHAEL A. CACCIOTTI	TIMOTHY PHILLIP SANDOVAL	\$2,500.00	
02	GOVERNING BOARD	C23028	01	BOARD ASSISTANT SERVICES FOR MICHAEL A. CACCIOTTI	CHAWKINS COMMUNICATIONS INC	\$2,500.00	
02	GOVERNING BOARD	C23120	01	BOARD ASSISTANT SERVICES FOR CARLOS RODRIGUEZ	MARK D TAYLOR	\$5,069.90	
02	GOVERNING BOARD	C23120	01	BOARD ASSISTANT SERVICES FOR CARLOS RODRIGUEZ	MARK D TAYLOR	\$983.07	
02	GOVERNING BOARD	C23135	01	BOARD ASSISTANT SERVICES FOR HOLLY J. MITCHELL	LORAIN LUNDQUIST	\$5,052.75	
02	GOVERNING BOARD	C23135	01	BOARD ASSISTANT SERVICES FOR HOLLY J. MITCHELL	LORAIN LUNDQUIST	\$722.37	
02	GOVERNING BOARD	C23153	01	BOARD ASSISTANT SERVICES FOR LARRY MCCALLON	DEBRA S MENDELSON	\$922.89	
02	GOVERNING BOARD	C23176	01	BOARD ASSISTANT SERVICES FOR PATRICIA LOCK DAWSON	THOMAS ALAN GROSS	\$633.96	
					Subtotal	\$133,653.69	
Other - Executive Officer Approved							
44	TECHNOLOGY ADVANCEMENT OFFICE	C22267	01	ACCESS LICENSE AGREEMENT	CITY OF DESERT HOT SPRINGS	\$0.00	1
42	RULE 1180 MONITORING	C22372	01	AIR MONITORING STATION LICENSE	CITY OF TORRANCE	\$10,800.00	
46	MONITORING AND ANALYSIS	C23046	01	LAUSD ACCESS AGREEMENT	LOS ANGELES UNIFIED SCHOOL DISTRICT	\$0.00	1
46	MONITORING AND ANALYSIS	C23049	01	AIR MONITORING LICENSE AGMNT	DESERT SANDS UNIFIED SCHOOL DISTRICT	\$3,130.00	
46	MONITORING AND ANALYSIS	C23081	01	AIR MONITORING LICENSE AGRMNT	CITY OF LOS ANGELES	\$0.00	1
46	MONITORING AND ANALYSIS	C23095	01	AIR MONITOR LEASE AGREEMENT	ONTARIO GATEWAY BUSINESS CENTER OWNERS ASSOCIATION	\$600.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C23172	01	LICENSE AGREEMENT WIND HARVEST	CESAR CAMPOS	\$1,000.00	
					Subtotal	\$15,530.00	
III. SPONSORSHIPS							
Sponsorships - Executive Officer Approved							
44	TECHNOLOGY ADVANCEMENT OFFICE	C22373	01	COSPONSOR 15TH ANNUAL VERDEXCHANGE CONFERENCE	COMMUNITY PARTNERS	\$2,500.00	

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35	LEGISLATIVE & PUBLIC AFFAIRS	C23034	01	COMMUNITY PARTNERS/CA SAFE SCHOOLS SPONSORSHIP FOR CA SAFE SCHOOL'S 24TH ANNIVERSARY-YOUR LIFE IS NOW	COMMUNITY PARTNERS	\$5,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C23036	01	SPONSORSHIP FOR LATINA PUBLIC SERVICE ACADEMY 2022	THE LATINA PUBLIC SERVICE ACADEMY	\$1,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C23041	01	SPONSORSHIP FOR DEL AMO ACTION COMMITTEE'S 8TH ANNUAL ENVIRONMENTAL JUSTICE ENFORCEMENT SYMPOSIUM	DEL AMO ACTION COMMITTEE	\$2,500.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C23085	01	BOY SCOUTS OF AMERICA CA INLAND EMPIRE COUNCIL 045 - ADVENTURE WEEKEND SPONSORSHIP	BOY SCOUTS OF AMERICA CALIFORNIA INLAND	\$1,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C23088	01	HABITAT FOR HUMANITY INTERNATIONAL SPONSORSHIP 2022	HABITAT FOR HUMANITY INTERNATIONAL INC	\$90,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C23089	01	LA SENTINEL'S 2022 17TH ANNUAL TASTE OF SOUL SPONSORSHIP	LOS ANGELES SENTINEL, INC	\$75,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C23091	01	BREATHE SOUTHERN CALIFORNIA SPONSORSHIP FOR 2022 BREATH OF LIFE AWARDS	BREATHE SOUTHERN CALIFORNIA	\$10,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23092	01	CO-SPONSOR THE 2022 ALTCAR EXPO & CONFERENCE	PLATIA PRODUCTIONS	\$8,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C23093	01	OUR GLOBAL HUMANITY, INC. SPONSORSHIP - BACK-TO-SCHOOL FOR HOLIDAYS EVENT	OUR GLOBAL HUMANITY INC.	\$5,000.00	
49	TAO CF/1B/CMP	C23106	01	COSPONSOR THE SOUTHERN CALIFORNIA CHINESE-AMERICAN ENVIRONMENTAL PROTECTION ASSOCIATION 2022 ACTIVITIES	SOUTHERN CALIFORNIA CHINESE-AMERICAN	\$1,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C23107	01	LEGACY LA YOUTH DEVELOPMENT CORPORATION EVENT SPONSORSHIP	LEGACY LA YOUTH DEVELOPMENT CORP.	\$5,000.00	
49	TAO CF/1B/CMP	C23109	01	CO-SPONSOR 33RD REAL WORLD EMISSIONS WORKSHOP	COORDINATING RESEARCH COUNCIL INC	\$5,000.00	
49	TAO CF/1B/CMP	C23110	01	CO-SPONSOR THE 2023 PORTABLE EMISSIONS MEASUREMENT SYSTEMS (PEMS) CONFERENCE	UNIVERSITY OF CALIFORNIA RIVERSIDE	\$10,000.00	
49	TAO CF/1B/CMP	C23114	01	SPONSOR UCI'S INTERNATIONAL COLLOQUIUM ON ENVIRONMENTALLY PREFERRED ADVANCED POWER GENERATION 2022 HYDROGEN: FUELING THE SUSTAINABLE FUTURE	UNIVERSITY OF CALIFORNIA - IRVINE	\$8,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C23116	01	SPONSOR RIVERSIDE COUNTY'S 2022 STATE OF THE COUNTY EVENT SPONSORSHIP	COUNTY OF RIVERSIDE	\$2,500.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23122	01	CO-SPONSOR CALSTART'S 30TH ANNUAL SYMPOSIUM	CALSTART, INC	\$15,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23125	01	CO-SPONSOR THE 17TH ANNUAL ENERGY INDEPENDENCE SUMMIT	TRANSPORTATION ENERGY PARTNERS	\$11,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C23129	01	SPONSOR 2023 NATIONAL CHAVEZ CENTER'S 20TH ANNUAL LEGACY AWARDS GALA	NATIONAL CHAVEZ CENTER	\$10,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C23139	01	BLACK HISTORY MONTH LUNCHEON SPONSORSHIP	SEVENTH GENERATION ADVISORS	\$5,000.00	

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03	EXECUTIVE OFFICE	C23152	01	3RD ANNUAL CALIFORNIA STATE UNIVERSITY LONG BEACH WOMEN IN ENGINEERING CONFERENCE SPONSORSHIP	CSULB 49ER FOUNDATION	\$5,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23155	01	COSPONSOR THE 2023 CALIFORNIA HYDROGEN LEADERSHIP SUMMIT	GLADSTEIN, NEANDROSS AND ASSOCIATES, LLC	\$6,500.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23156	01	CO-SPONSOR THE 2023 ADVANCED CLEAN TRANSPORTATION EXPO	GLADSTEIN, NEANDROSS AND ASSOCIATES, LLC	\$50,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23157	01	CO-SPONSOR THE 2023 VERDEXCHANGE CONFERENCE	COMMUNITY PARTNERS	\$2,500.00	
49	TAO CF/1B/CMP	C23160	01	COSPONSOR THE ASILOMAR 2023 CONFERENCE ON TRANSPORTATION AND ENERGY	UNIVERSITY OF CALIFORNIA-DAVIS	\$30,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C23177	01	SPONSORSHIP FOR 10TH ANNUAL FIGHTING FOR LIFE CELEBRATION	EAST YARD COMMUNITIES	\$2,500.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C23178	01	CO-SPONSOR MOVE LA'S COMMUNITY CONVERSATION 2023 CONFERENCE	COMMUNITY PARTNERS	\$5,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C23197	01	SPONSORSHIP OF CENTRAL AVENUE JAZZ FESTIVAL	COALITION FOR RESPONSIBLE COMMUNITY	\$5,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C23198	01	WESTERN RIVERSIDE COUNCIL OF GOVERNMENTS SUPPORTING FOUNDATION SPONSORSHIP 32ND ANNUAL GENERAL ASSEMBLY & LEADERSHIP ADDRESS	WRCOG SUPPORTING FOUNDATION	\$7,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C23220	01	COALITION FOR CLEAN AIR CALIFORNIA 2023 AIR QUALITY AWARDS SPONSORSHIP	COALITION FOR CLEAN AIR	\$8,500.00	
					Subtotal	\$394,500.00	
IV. MODIFICATIONS							
Board Approved							
44	TECHNOLOGY ADVANCEMENT OFFICE	C15380	31	TECHNICAL ASSISTANCE WITH GOODS MOVEMENT, ALTERNATIVE FUELS AND ZERO-EMISSION TRANSPORTATION TECHNOLOGIES	ICF RESOURCES, LLC	\$30,000.00	
08	LEGAL	C16392	01	PROVIDE LEGAL ADVICE AND COUNSEL	HALPERN MAY YBARRA GELBERG LLP	\$175,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C17310	76	RNG COMMERCIAL FIELD TEST	KORE INFRASTRUCTURE, LLC	\$0.00	1
08	LEGAL	C18114	01	PROVIDE LEGAL ADVICE AND COUNSEL	WOODRUFF & SMART, A PROFESSIONAL CORP	\$150,000.00	
08	LEGAL	C18114	01	PROVIDE LEGAL ADVICE AND COUNSEL	WOODRUFF & SMART, A PROFESSIONAL CORP	\$200,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C19278	67	DEVELOP AND DEMONSTRATING ZERO AND NEAR ZERO-EMISSION FREIGHT FACILITIES, 23 CLASS 8 BATTERY ELECTRIC TRUCKS, CHARGING INFRASTRUCTURE, SOLAR AND ENERGY STORAGE AT FLEETS	VOLVO TECHNOLOGY OF AMERICA LLC	\$1,044,854.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C21088	01	EMPLOYMENT AND LABOR RELATIONS	ATKINSON, ANDELSON, LOYA, RUUD & ROMO	\$25,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C21171	01	LEGISLATIVE REPRESENTATION IN SACRAMENTO	CALIFORNIA ADVISORS LLC	\$142,080.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C21172	01	LEGISLATIVE REPRESENTATION IN SACRAMENTO	JOE A GONSALVES & SON	\$143,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C21173	01	LEGISLATIVE REPRESENTATION IN SACRAMENTO	QUINTANA, WATTS & HARTMANN LLC	\$180,000.00	
27	INFORMATION MANAGEMENT	C21331	01	SHORT AND LONG-TERM SYSTEMS DEVELOPMENT	AGREEYA SOLUTIONS, INC	\$305,000.00	
27	INFORMATION MANAGEMENT	C21331	01	SHORT AND LONG-TERM SYSTEMS DEVELOPMENT	AGREEYA SOLUTIONS, INC	\$250,000.00	

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27	INFORMATION MANAGEMENT	C21332	01	SYSTEM DEVELOPMENT, MAINTAINENCE AND SUPPORT	PRELUDE SYSTEMS, INC.	\$55,000.00	
27	INFORMATION MANAGEMENT	C21332	01	SYSTEM DEVELOPMENT, MAINTAINENCE AND SUPPORT	PRELUDE SYSTEMS, INC.	\$525,000.00	
27	INFORMATION MANAGEMENT	C21333	01	SYSTEM DEVELOPMENT, MAINTAINENCE AND SUPPORT	SIERRA CYBERNETICS INC	\$210,000.00	
27	INFORMATION MANAGEMENT	C21333	01	SYSTEM DEVELOPMENT, MAINTAINENCE AND SUPPORT	SIERRA CYBERNETICS INC	\$250,000.00	
27	INFORMATION MANAGEMENT	C21335	01	SHORT AND LONG-TERM SYSTEMS DEVELOPMENT	VARSDUN ETECHNOLOGIES GROUP, INC	\$297,000.00	
27	INFORMATION MANAGEMENT	C21335	01	SHORT AND LONG-TERM SYSTEMS DEVELOPMENT	VARSDUN ETECHNOLOGIES GROUP, INC	\$825,000.00	
27	INFORMATION MANAGEMENT	C21335	01	SHORT AND LONG-TERM SYSTEMS DEVELOPMENT	VARSDUN ETECHNOLOGIES GROUP, INC	\$318,960.00	
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C21396	01	TECHNICAL UPGRADES, INTEGRATION OF DATA	SONOMA TECHNOLOGY INC	\$16,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22071	81	PROP 1B VEHICLE REPLACEMENT	CEMEX CONSTRUCTION MATERIAL PACIFIC, LLC	\$800,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22099	32,77	TECHNICAL ASSISTANCE, IMPLEMENTATION, OUTREACH SUPPORT FOR CARL MOYER PROGRAM	GREEN PARADIGM CONSULTING, INC	\$100,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C22138	01	LEGISLATIVE REPRESENTATION IN WASHINGTON DC	KADESH & ASSOCIATES, LLC	\$226,392.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C22139	01	LEGISLATIVE REPRESENTATION IN WASHINGTON DC	CARMEN GROUP, INC	\$222,090.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C22140	01	LEGISLATIVE REPRESENTATION IN WASHINGTON DC	CASSIDY & ASSOCIATES, INC	\$216,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22249	79	REPLACEMENT OF 5 ONROAD CLASS 8 TRUCKS	INTERMODAL EQUIPMENT LEASING INC	\$85,000.00	
08	LEGAL	C22345	01	PROVIDE LEGAL ADVICE AND COUNSEL	SHUTE MIHALY & WEINBERGER LLP	\$225,000.00	
08	LEGAL	C22345	01	PROVIDE LEGAL ADVICE AND COUNSEL	SHUTE MIHALY & WEINBERGER LLP	\$350,000.00	
08	LEGAL	C22345	01	PROVIDE LEGAL ADVICE AND COUNSEL	SHUTE MIHALY & WEINBERGER LLP	\$125,000.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C22416	01	LANDSCAPE & TREE MAINTENANCE	TROPICAL PLAZA NURSERY INC	\$30,000.00	
44	MSRC	MS21002	23	PROGRAMMATIC OUTREACH SERVICES	BETTER WORLD GROUP ADVISORS	\$183,075.00	
44	MSRC	MS21005	23	IMPLEMENT LAST MILE GOODS MOVEMENT PROGRAM	SOUTHERN CALIFORNIA ASSOCIATION OF GOVT	\$6,751,000.00	
44	MSRC	MS21006	23	HOST & MAINTAIN MSRC WEBSITE	GEOGRAPHICS	\$7,200.00	
					SUBTOTAL	\$14,462,651.00	
Executive Officer Approved							
44	TECHNOLOGY ADVANCEMENT OFFICE	C14100	32	REPOWER 2 MAIN ENG OF 2 MARINE VE	CAPE BLANCO FISHING LP	\$0.00	6
08	LEGAL	C14191	01	PROVIDE LEGAL ADVICE AND COUNSEL	KTBS LAW LLP	\$0.00	6
16	ADMINISTRATIVE & HUMAN RESOURCES	C14670	01	CLASSIFICATION & COMP SERVICES	KOFF & ASSOCIATES, INC.	\$0.00	6
16	ADMINISTRATIVE & HUMAN RESOURCES	C15025	01	MEDICAL SERVICE PROVIDER	KAISER FOUNDATION HEALTH PLAN	\$0.00	6
16	ADMINISTRATIVE & HUMAN RESOURCES	C15026	01	OCCUPATIONAL HEALTH SERVICES	UNIVERSITY OF CALIFORNIA - IRVINE	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C15366	31	LICENSE AGREEMENT FOR HYDROGEN FUELING STATION	ENGINEERING, PROCUREMENT & CONSTRUCTION	\$0.00	6

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27	INFORMATION MANAGEMENT	C15468	01	SHORT AND LONG-TERM SYSTEMS DEVELOPMENT, MAINTENANCE AND SUPPORT SERVICES	VARSDUN ETECHNOLOGIES GROUP, INC	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C15534	80	REPLACEMENT OF 2 AND REPOWER OF 3 OFF-ROAD VEHICLES	SAGE GREEN, LLC	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C15611	31	INSTALLATION OF ONTARIO RENEWABLE HYDROGEN FUELING STATION	ONTARIO CNG STATION INC.	\$0.00	6
08	LEGAL	C16042	01	PROVIDE LEGAL ADVICE AND COUNSEL	ARNOLD & PORTER KAYE SCHOLER LLP	\$0.00	6
08	LEGAL	C16063	01	PROVIDE LEGAL ADVICE AND COUNSEL	HOGAN LOVELLS US LLP	\$0.00	6
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C16359	01	TECHNICAL SUPPORT FOR SCAQMD MEASUREMENTS RELATED TO THE COACHELLA VALLEY	TECHNICAL AND BUSINESS SYSTEMS	\$50,000.00	
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C16393	01	CONSULTANTS TO PROVIDE CEQA ASSISTANCE	PLACEWORKS INC	\$100,000.00	
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C16394	01	CONSULTANTS TO PROVIDE CEQA ASSISTANCE	ENVIRONMENTAL AUDIT INC	\$75,000.00	
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C16394	01	CONSULTANTS TO PROVIDE CEQA ASSISTANCE	ENVIRONMENTAL AUDIT INC	\$25,000.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C18035	01	COUNSEL: LIABILITY LITIGATION	DUNBAR & ASSOCIATES, A PROFESSIONAL LAW	\$50,000.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C18035	01	COUNSEL: LIABILITY LITIGATION	DUNBAR & ASSOCIATES, A PROFESSIONAL LAW	\$0.00	6
16	ADMINISTRATIVE & HUMAN RESOURCES	C18085	01	INSURANCE BROKERAGE SERVICES	ALLIANT INSURANCE SERVICES INC	\$50,980.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C18098	31	DEMO ZERO AND NEAR-ZERO EMISSION DRAYAGE TRUCKS AND CARGO HANDLING EQUIPMENT	CALIFORNIA ENERGY COMMISSION	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C18193	02	ENERGY EFFICIENCY DEMONSTRATION AT SCAQMD	WILLDAN LIGHTING & ELECTRIC OF CALIFORNI	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C18194	31	DEVELOP AND DEMONSTRATE NEAR-ZERO EMISSION OPPOSED PISTON ENGINE	CALSTART, INC	\$0.00	6
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C18196	01	PROVIDE PERMIT SOURCE MODELING SUPPORT FOR PERMITTING APPLICATIONS AND CLOSELY RELATED TASKS	CASTLE ENVIRONMENTAL CONSULTING, LLC	\$24,000.00	
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C18260	27	PROCESS APPLICATIONS FOR ALL ELECTRIC HEAT PUMPS	ELECTRIC & GAS INDUSTRIES ASSOCIATION	\$0.00	6
27	INFORMATION MANAGEMENT	C18288	01	SHORT AND LONG-TERM SYSTEMS DEVELOPMENT	VARSDUN ETECHNOLOGIES GROUP, INC	\$0.00	6
27	INFORMATION MANAGEMENT	C18292	01	SHORT AND LONG-TERM SYSTEMS DEVELOPMENT	PRELUDE SYSTEMS, INC.	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C18295	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	BLACKMORE CO. LLC	\$0.00	6
08	LEGAL	C18303	01	ONLINE LEGAL RESEARCH/SERVICES	THOMSON REUTERS - WEST PYMT CTR	\$72,444.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C19075	77	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	KUNO'S GRADING, INC	\$0.00	6
16	ADMINISTRATIVE & HUMAN RESOURCES	C19204	01	LEARNING MANAGEMENT SYSTEM	NEOGOV	\$36,965.83	

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16	ADMINISTRATIVE & HUMAN RESOURCES	C19206	01	OPERATE SCAQMD CAFETERIA	CALIFORNIA DINING SERVICES	\$0.00	6
16	ADMINISTRATIVE & HUMAN RESOURCES	C19206	01	OPERATE SCAQMDCAFETERIA	CALIFORNIA DINING SERVICES	\$65,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C19302	31	TECHNICAL ASSISTANCE WITH HYDROGEN INFRASTRUCTURE AND RELATED PROJECTS	JERALD A COLE	\$0.00	6
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C19317	27	DEVELOP PROTOTYPE CONDENSING AND NON-CONDENSING FURNACES	LANTEC PRODUCTS, INC.	\$0.00	6
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C19318	27	HIGH EFFICIENCY AND LOW NO _x COMBO RIBBON BURNER COMBUSTION SYSTEM DEMONSTRATION.	GAS TECHNOLOGY INSTITUTE	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C19344	54	DEMONSTRATION OF LOW NO _x COMBUSTION TECHNOLOGY ON REFINERY HEATER	CLEARSIGN COMBUSTION CORPORATION	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C19369	56	EFMP PROGRAM DISMANTLER	LKQ-PICK YOUR PART-1275	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C19390	01	LICENSE AGREEMENT FOR AIR MONITORING STATION – VENTURA TRANSFER COMPANY	VENTURA TRANSFER COMPANY	\$17,160.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C19404	77	CONSTRUCTION AND OPERATION OF RENEWABLE NATURAL GAS FILLING STATION	FOOD EXPRESS, INC.	\$0.00	6
16	ADMINISTRATIVE & HUMAN RESOURCES	C19445	01	MAINTENANCE, SERVICE AND REPAIRS OF HVAC AND REFRIGERATION EQUIPMENT	KLM, INC	\$49,184.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C19464	17	BATTERY ELECTRIC YARD TRACTOR REPLACEMENT PROJECT	WEST BASIN CONTAINER TERMINAL LLC	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C20051	54	COMMERCIAL HARBOR CRAFT NO _x AND PM EMISSION REDUCTION TECHNOLOGY DEMONSTRATION	NETT TECHNOLOGIES INC.	\$0.00	6
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C20078	01	CANSAC-CEFA PARTNERSHIP PROGRAM FOR CLIMATE ECOSYSTEM AND FIRE APPLICATION	DESERT RESEARCH INSTITUTE	\$15,000.00	
08	LEGAL	C20081	01	PROVIDE LEGAL ADVICE AND COUNSEL	PROSKAUER ROSE LLP	\$75,000.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C20083	01	SUBLEASE - SACRAMENTO OFFICE	BAY AREA AIR QUALITY MANAGEMENT DISTRICT	\$6,954.32	
44	TECHNOLOGY ADVANCEMENT OFFICE	C20086	80	TECHNICAL ASSISTANCE AND IMPLEMENTATION OF THE CARL MOYER PROGRAM	CALSTART, INC	\$0.00	6
08	LEGAL	C20127	01	PROVIDE LEGAL ADVICE AND COUNSEL	SLOVER & LOFTUS	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C20137	01	AIR MONITORING STATION LEASE AGREEMENT WITH LEEWARD BAY MARINA.	LEEWARD BAY MARINA	\$12,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C20140	83	DEVELOP AND DEMONSTRATE WATER IN FUEL RETROFIT FOR OCEAN GOING VESSELS	MAN ENERGY SOLUTIONS USA INC.	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C20207	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	FUENTES BROS TRUCKING	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C20207	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	FUENTES BROS TRUCKING	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C20211	01	LICENSE AGREEMENT FOR AIR MONITORING STATION – SAINT ANTHONY CATHOLIC CHURCH	ST ANTHONY CHURCH	\$48,600.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C20244	31	DEMONSTRATE FUEL CELL RANGE-EXTENDED DRAYAGE TRUCKS	CUMMINS ELECTRIFIED POWER NA INC	\$0.00	6

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44	TECHNOLOGY ADVANCEMENT OFFICE	C20270	77	REPOWER 3 MARINE VESSELS	PACIFIC TUGBOAT SERVICES	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C20289	32	REPLACEMENT OF OLDER OFF-ROAD VEHICLE	PRADO RECREATION INC	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C20318	77	REPLACEMENT OF 7 OFF-ROAD EQUIPMENT	ECOLOGY RECYCLING SERVICES, LLC	\$0.00	6
16	ADMINISTRATIVE & HUMAN RESOURCES	C20335	01	DEFERRED COMPENSATION PLAN CONSULTANT SERVICE	BENEFIT FINANCIAL SERVICES GROUP	\$36,000.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C20337	01	HARASSMENT TRAINING PREVENTION	KANTOLA TRAINING SOLUTIONS	\$1,142.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C20358	77	EXPAND 1 RNG FILLING STATION	LOS ANGELES COUNTY SANITATION DISTRICTS	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C21052	54	SCAQMD APPROVED PARTICIPATING DEALERSHIP IN MARKET ACCELERATION PROGRAM	VELOCITY TRUCK CENTERS	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C21069	31	MOA-EVALUATE VEHICLE MAINTENANCE COSTS BETWEEN NG AND DIESEL FUELED ON-ROAD HEAVY DUTY VEHICLES	SOUTHERN CALIFORNIA GAS COMPANY	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C21070	31	MOA-ASSESS EMISSION IMPACTS OF HYDROGEN-NATURAL GAS FUEL BLEND ON NATURAL GAS ENGINES	SOUTHERN CALIFORNIA GAS COMPANY	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C21083	31	ASSESS EMISSIONS IMPACTS OF HYDROGEN-NATURAL GAS FUEL BLEND ON NATURAL GAS ENGINES	UNIVERSITY OF CALIFORNIA RIVERSIDE	\$0.00	6
16	ADMINISTRATIVE & HUMAN RESOURCES	C21088	01	EMPLOYMENT AND LABOR RELATIONS	ATKINSON, ANDELSON, LOYA, RUUD & ROMO	\$0.00	6
16	ADMINISTRATIVE & HUMAN RESOURCES	C21089	01	EMPLOYEE AND LABOR RELATIONS	LIEBERT CASSIDY WHITMORE	\$0.00	11
16	ADMINISTRATIVE & HUMAN RESOURCES	C21089	01	EMPLOYEE AND LABOR RELATIONS	LIEBERT CASSIDY WHITMORE	\$0.00	6
08	LEGAL	C21090	01	PROVIDE LEGAL ADVICE AND COUNSEL	OLSON REMCHO LLP	\$0.00	6
17	CLERK OF THE BOARDS	C21094	01	LEGAL REPRESENTATION FOR HEARING BOARD	STRUMWASSER & WOOCHEER LLP	\$35,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C21101	77	TECHNICAL ASSISTANCE IMPLEMENTATION & OUTREACH SUPPORT FOR COMMUNITY AIR PROTECTION PROGRAM (CAPP)	GREEN PARADIGM CONSULTING, INC	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C21122	81	HEAVY DUTY TRUCK REPLACEMENT -PROP 1B PROGRAM	CROWN XPRESS TRANSPORT	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C21131	77	CONSTRUCTION AND OPERATION OF 2 RNG FILING STATIONS	CR&R INCORPORATED	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C21191	01	AIR MONITORING LEASE AGREEMENT	CITY OF TORRANCE	\$19,500.00	
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C21206	01	CONSULTANTING ASSISTANCE FOR CEQA AIR QUALITY ANALYSIS REVIEW AND POLICY DEVELOPMENT	CASTLE ENVIRONMENTAL CONSULTING, LLC	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C21208	77	REPOWER 1 OFF ROAD CARGO EQUIPMENT	FENIX MARINE SERVICES LTD	\$0.00	6

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44	TECHNOLOGY ADVANCEMENT OFFICE	C21216	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	HONDO FRAMING, INC	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C21217	77	REPLACEMENT OF 5 OFF ROAD CARGO EQUIPMENT	TOTAL TERMINALS INTERNATIONAL, LLC	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C21218	77	REPOWER 4 OFF-ROAD CARGO EQUIPMENT	UNITED TERMINAL LEASING LLC	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C21219	77	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	NORTH SHORE GREENHOUSES INC	\$0.00	6
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C21222	01	INVESTIGATING OGV NO _x EMISSIONS USING AIRBORNE MEASUREMENT DATA	EXPLICIT APS	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C21240	83	DEVELOP AND DEMONSTRATE CAPTURE AND CONTROL SYSTEM FOR OIL TANKERS PROJECT	STAX ENGINEERING INC	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C21251	27	REPOWER 1 MARINE VESSEL	FUKUSHIMA FISHING LLC	\$0.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C21256	77	REPLACEMENT OF 10 OFF-ROAD EQUIPMENT	C&M METALS, INC	\$0.00	11
44	TECHNOLOGY ADVANCEMENT OFFICE	C21260	01	TECHNICAL ASSISTANCE WITH INCENTIVE AND RESEARCH AND DEVELOPMENT PROGRAMS	FREDRICK MINASSIAN	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C21263	77	REPOWER OF 3 MAIN ENGINES OF 1 MAIN VESSEL	AMERICAN MARINE CORPORATION	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C21271	32	REPLACE 4 OFF-ROAD ENGINES	EMERALD ACRES LLC	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C21274	32	REPLACEMENT OF 2 OFF-ROAD EQUIPMENT	ORGANIC DEPOT LLC	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C21301	77	REPOWER 1 MARINE VESSEL	AUGELLO ENTERPRISES LLC	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C21305	32	REPOWER 2 OFF ROAD EQUIPMENT	P. RILEY ENTERPRISES, INC.	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C21318	79	REPLACEMENT OF 1 ONROAD DRAYAGE TRUCK	MORTIMER & WALLACE INC	\$0.00	6
16	ADMINISTRATIVE & HUMAN RESOURCES	C21330	01	SEARCH AND RECRUITMENT SERVICES	CPS HR CONSULTING	\$25,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C21341	27	REPOWER 2 MAIN AND 2 AUXILIARY ENGINES OF A MARINE VESSEL	MADRUGADOR INC	\$0.00	6
35	LEGISLATIVE & PUBLIC AFFAIRS	C21359	01	BLUE SKY LA PROGAM SPNSORSHIP	BREATHE SOUTHERN CALIFORNIA	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C21363	77	REPOWER 1 MAINE ENGINE MARINE VESSEL	VICTORY SPORTFISHING CO, INC.	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C21363	77	REPOWER 1 MAINE ENGINE MARINE VESSEL	VICTORY SPORTFISHING CO, INC.	\$0.00	6
16	ADMINISTRATIVE & HUMAN RESOURCES	C21374	01	HUMAN RESOURCES CONSULTING	SHAW HR CONSULTING, INC.	\$15,000.00	
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C21395	01	DERIVE MASS AND SPECIFIC EMISSION FACTORS OF NO _x AT DIFFERENT PROPULSION ENGINE LOADS FROM ITS PROPRIETARY REMOTE SNIFFER MEASUREMENTS AT THE GREAT BELT BRIDGE	FLUXSENSE AB	\$0.00	6

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44	TECHNOLOGY ADVANCEMENT OFFICE	C22054	80	REPOWER 1 MAINE ENGINE MARINE VESSEL	MARINA DEL REY SPORTFISHING, LLC	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C22055	79	REPLACEMENT OF 2 ON-ROAD CLASS 8 DRAYAGE TRUCKS	TRI-MODAL DISTRIBUTION SERVICES INC	\$0.00	6
08	LEGAL	C22067	01	PROVIDE LEGAL ADVICE AND COUNSEL	BEST BEST & KRIEGER	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C22084	31	DEVELOP AND DEMONSTRATE HYDROGEN FUEL CELL MEDIUM-DUTY BUSES	A-1 ALTERNATIVE FUEL SYSTEMS	\$0.00	6
35	LEGISLATIVE & PUBLIC AFFAIRS	C22087	01	FACILITATOR SERVICES FOR EASTERN COACHELLA VALLEY AB 617 COMMUNITY	VMA COMMUNICATIONS, INC.	\$0.00	6
16	ADMINISTRATIVE & HUMAN RESOURCES	C22100	01	EMPLOYEE DE-ESCALATION TRAINING	CHUBB GLOBAL RISK ADVISORS	\$3,840.00	
16	ADMINISTRATIVE & HUMAN RESOURCES	C22101	01	INVESTIGATIVE SERVICES	PUBLIC INTEREST INVESTIGATIONS INC	\$10,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C22102	01	FACILITATION SERVICES FOR THE SOUTH LOS ANGELES AB 617 COMMUNITY	CASTILLO CONSULTING PARTNERS, LLC	\$18,000.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22108	67	OUTREACH FOR JETSI PILOT PROGRAM	COALITION FOR CLEAN AIR	\$0.00	6
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C22111	01	HEALTH EFFECTS SUPPORT FOR AQMP	KHADEEJA ABDULLAH	\$5,000.00	
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C22112	01	ASSIST WITH EMISSION REDUCTION ESTIMATES FOR OCEANGOING VESSELS	ENERGY AND ENVIRONMENTAL RESEARCH	\$2,500.00	
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C22152	01	PROVIDE ASSISTANCE 2022 AQMP	INDUSTRIAL ECONOMICS INCORPORATED	\$55,113.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22165	32	REPOWER 2 MAIN ENGINES OF A MARINE VESSEL	KISSEL BOAT DESIGN LLC	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C22169	32	REPOWER 2 MAIN ENGINES OF A MARINE VESSEL	NATIVE SUN SPORTFISHING INC	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C22171	32	REPLACEMENT OF 1 OFF ROAD EQUIPMENT	A J ZIMMER CONSTRUCTION INC	\$0.00	11
44	TECHNOLOGY ADVANCEMENT OFFICE	C22175	32	REPOWER 1 MAIN ENGINES OF A MARINE VESSEL	REDONDO SPECIAL LLC	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C22179	32	REPOWER 2 MAIN ENGINES OF A MARINE VESSEL	HARRY PROUTY	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C22180	32	REPOWER 2 MAIN ENGINES OF A MARINE VESSEL	CHRISTOPHER CASTRO	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C22181	32	REPOWER 2 MAIN ENGINES OF A MARINE VESSEL	FURY SEA ADVENTURES INC	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C22182	32	REPOWER 4 MAIN ENGINES OF A MARINE VESSEL	HARBOR DOCKSIDE, INC.	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C22183	32	REPLACEMENT OF 5 DIESEL LOCOMOTIVES	CALIFORNIA STEEL INDUSTRIES, INC	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C22187	32	REPOWER 2 MAIN ENGINES OF M/V	J&M MARINE INVESTMENT LLC	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C22188	32	REPOWER 1 MARINE VESSEL	JAMES CVITANOVICH	\$0.00	6

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44	TECHNOLOGY ADVANCEMENT OFFICE	C22195	77	REPOWER 4 MAIN ENGINES MARINE	CATALINA CHANNEL EXPRESS, INC	\$0.00	6
16	ADMINISTRATIVE & HUMAN RESOURCES	C22244	01	MENTORING SUBSCRIPTION SOFTWARE	MENTORCLIQ INC	\$21,450.00	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22253	32	REPOWER 1 MAIN ENGINE OF 1 A MARINE VESSEL	AMERICAN MARINE CORPORATION	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C22254	32	REPOWER 1 MAIN ENGINE OF A MARINE VESSEL	GREGORY L WATSON	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C22257	32	REPOWER 1 MAIN ENGINE OF A MARINE VESSEL	J&T SPORTFISHING INC	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C22260	32	REPOWER 2 MAIN ENGINES OF MARINE VESSEL	HANSON FISHERIES CORP	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C22262	31	STUDY OF FUEL CELL MICROGRIDS	UNIVERSITY OF CALIFORNIA - IRVINE	\$0.00	11
44	TECHNOLOGY ADVANCEMENT OFFICE	C22355	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	BNSF RAILWAY COMPANY	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C22368	32	REPLACEMENT OF 2 OFF-ROAD EQUIPMENT	FISCHER, INC	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C22383	32	REPLACEMENT OF 1 OFF-ROAD EQUIPMENT	NATURES BEST FARMS INC	\$0.00	6
26	PLANNING, RULE DEVELOPMENT & IMPLEMENTATION	C22395	01	ASSIST STAFF WITH 2022 AQMP	INDUSTRIAL ECONOMICS INCORPORATED	\$99,981.60	
44	TECHNOLOGY ADVANCEMENT OFFICE	C22404	32	CONSTRUCTION AND OPERATION OF 2 NEW ELECTRIC VEHICAL CHARGING STATIONS	WATTEV INC	\$0.00	11
03	EXECUTIVE OFFICE	C22421	01	PROVIDE CONSULTING SERVICES	BROADBENT CONSULTING GROUP, LLC	\$50,000.00	
03	EXECUTIVE OFFICE	C22421	01	PROVIDE CONSULTING SERVICES	BROADBENT CONSULTING GROUP, LLC	\$0.00	6
46	MONITORING AND ANALYSIS	C23046	01	LAUSD ACCESS AGREEMENT	LOS ANGELES UNIFIED SCHOOL DISTRICT	\$0.00	6
43	M&A-AQ-SPEC	C23076	01	AIRSENSOR DATA ACCESS UPGRADE	DESERT RESEARCH INSTITUTE	\$0.00	6
44	TECHNOLOGY ADVANCEMENT OFFICE	C23080	79	REPLACEMENT OF 1 ON-ROAD 8 DRAY TRUCK	LUNA LOGISTICS INC	\$0.00	6
46	MONITORING AND ANALYSIS	C23095	01	AIR MONITOR LEASE AGREEMENT	ONTARIO GATEWAY BUSINESS CTR OWNERS ASSO	\$600.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C23102	01	CO-LEAD WITH SCOPE & WCAEC	PHYSICIANS FOR SOCIAL RESPONSIBILITY	\$0.00	6
35	LEGISLATIVE & PUBLIC AFFAIRS	C23102	01	CO-LEAD WITH SCOPE & WCAEC	PHYSICIANS FOR SOCIAL RESPONSIBILITY	\$20,000.00	
35	LEGISLATIVE & PUBLIC AFFAIRS	C23102	01	CO-LEAD WITH SCOPE & WCAEC	PHYSICIANS FOR SOCIAL RESPONSIBILITY	\$20,000.00	
44	MSRC	ML14027	23	INSTALL CNG STATION DOWNEY	COUNTY OF LOS ANGELES	\$0.00	6
44	MSRC	ML16017	23	PURCHASE 50 MEDIUM-DUTY, 17 H.D. NATURAL GAS VEHICLES, AND NEW CNG STATION	CITY OF LONG BEACH	\$0.00	6
44	MSRC	ML16022	23	PURCHASE 12 HD NATURAL GAS VEHICLES	DEPARTMENT OF WATER & POWER	\$0.00	6
44	MSRC	ML16047	23	ENHANCE CLASS 1 BIKEWAY	CITY OF FONTANA	\$0.00	6
44	MSRC	ML16057	23	IMPLEMENT A "COMPLETE STREETS" PEDESTRIAN ACCESS PROJECT	CITY OF YUCAIPA	\$0.00	6
44	MSRC	ML18020	23	PURCHASE 1 MEDIUM-DUTY AND 1 HEAVY-DUTY ZERO EMISSION VEHICLE	CITY OF COLTON	\$0.00	6
44	MSRC	ML18030	23	INSTALL E/V CHARGING INFRASTRUCTURE	CITY OF GRAND TERRACE	\$0.00	0
44	MSRC	ML18036	23	INSTALL E/V CHARGING INFRASTRUCTURE	CITY OF INDIAN WELLS	\$0.00	6

**South Coast AQMD
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DEPT ID	DEPT NAME	CONTRACT NUMBER	FUND CODE	DESCRIPTION	VENDOR NAME	CONTRACT AMOUNT	FOOTNOTE
44	MSRC	ML18047	23	PURCHASE 5 HEAVY-DUTY NEAR-ZERO EMISSION VEHICLES	CITY OF WHITTIER	\$0.00	6
44	MSRC	ML18051	23	PURCHASE 6 LIGHT-DUTY ZEVS, INSTALL 3 LIMITED ACCESS AND 5 PUBLIC ACCESS E/V CHARGING STATIONS.	CITY OF RANCHO CUCAMONGA	\$0.00	6
44	MSRC	ML18055	23	INSTALL 50 E/V CHARGING STATIONS	CITY OF LONG BEACH	\$0.00	11
44	MSRC	ML18057	23	PURCHASE 5 ZERO-EMISSION VEHICLES AND E/V CHARGING INFRASTRUCTURE	CITY OF CARSON	\$0.00	6
44	MSRC	ML18058	23	PURCHASE 1 MEDIUM-DUTY ZEV AND E/V CHARGING INFRASTRUCTURE	CITY OF PERRIS	\$0.00	6
44	MSRC	ML18059	23	INSTALL E/V CHARGING INFRASTRUCTURE	CITY OF GLENDALE	\$0.00	11
44	MSRC	ML18059	23	INSTALL E/V CHARGING INFRASTRUCTURE	CITY OF GLENDALE	\$0.00	11
44	MSRC	ML18067	23	INSTALL E/V CHARGING INFRASTRUCTURE	CITY OF PICO RIVERA	\$0.00	6
44	MSRC	ML18080	23	INSTALL E/V CHARGING INFRASTRUCTURE	CITY OF SANTA MONICA	\$0.00	6
44	MSRC	ML18082	23	PURCHASE MEDIUM-DUTY VEHICLES AND E/V CHARGING INFRASTRUCTURE	CITY OF LOS ANGELES	\$0.00	11
44	MSRC	ML18082	23	PURCHASE MEDIUM-DUTY VEHICLES AND E/V CHARGING INFRASTRUCTURE	CITY OF LOS ANGELES	\$0.00	11
44	MSRC	ML18089	23	PURCHASE A MEDIUM-DUTY ZEV. REVISED TO PURCHASE A HEAVY-DUTY ZEV.	CITY OF GLENDORA	\$0.00	6
44	MSRC	ML18091	23	INSTALL 16 E/V CHARGING STATIONS	CITY OF TEMECULA	\$0.00	6
44	MSRC	ML18093	23	PURCHASE 1 HEAVY-DUTY NEAR-ZERO EMISSION VEHICLE	CITY OF MONTEREY PARK	\$0.00	6
44	MSRC	ML18094	23	INSTALL E/V CHARGING STATIONS	CITY OF LAGUNA WOODS	\$0.00	6
44	MSRC	ML18099	23	INSTALL E/V CHARGING STATIONS	CITY OF LAGUNA HILLS	\$0.00	6
44	MSRC	ML18100	23	INSTALL E/V CHARGING STATIONS	CITY OF BREA	\$0.00	6
44	MSRC	ML18129	23	INSTALL E/V CHARGING STATIONS	CITY OF YUCAIPA	\$0.00	6
44	MSRC	ML18132	23	INSTALL E/V CHARGING STATIONS	CITY OF MONTCLAIR	\$0.00	6
44	MSRC	ML18141	23	PURCHASE 1 LIGHT-DUTY ZE/V AND INSTALL E/V CHARGERS	CITY OF ROLLING HILLS ESTATES	\$0.00	6
44	MSRC	ML18144	23	INSTALL E/V CHARGING STATIONS	CITY OF FONTANA	\$0.00	6
44	MSRC	ML18145	23	PROVIDE REBATES TO PURCHASERS OF ZERO-EMISSION TAXIS AND PURCHASE ELEVEN HEAVY-DUTY ZERO-EMISSION VEHICLES	CITY OF LOS ANGELES	\$0.00	6
44	MSRC	ML18148	23	INSTALLATION OF BICYCLE DETECTION SYSTEMS AT INTERSECTIONS ON ARROW HIGHWAY IN SAN DIMAS	CITY OF SAN DIMAS	\$0.00	6
44	MSRC	ML18159	23	PURCHASE 9 LIGHT-DUTY ZE/Vs AND E/V CHARGING INFRASTRUCTURE	CITY OF RIALTO	\$0.00	6
44	MSRC	ML18170	23	PURCHASE 2 LIGHT-DUTY ZE/Vs AND E/V CHARGING INFRASTRUCTURE	CITY OF LAGUNA NIGUEL	\$0.00	7
44	MSRC	ML18178	23	PURCHASE 1 HEAVY-DUTY NEAR-ZERO EMISSION VEHICLE	CITY OF LA PUENTE	\$0.00	6
44	MSRC	MS14059	23	IMPLEMENT VARIOUS SIGNAL SYNCHRONIZATION PROJECTS	RIVERSIDE CO. TRANSPORTATION COMMISSION	\$0.00	6

**South Coast AQMD
Contract Activity Report
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DEPT ID	DEPT NAME	CONTRACT NUMBER	FUND CODE	DESCRIPTION	VENDOR NAME	CONTRACT AMOUNT	FOOTNOTE
44	MSRC	MS16094	23	METROLINK FIRST MILE/LAST MILE MOBILITY STRATEGIES	RIVERSIDE CO. TRANSPORTATION COMMISSION	\$0.00	6
44	MSRC	MS18015	23	SOUTHERN CALIFORNIA FUTURE COMMUNITIES PARTNERSHIP PROGRAM	SOUTHERN CALIFORNIA ASSOCIATION OF GOVT	\$0.00	6
44	MSRC	MS18015	23	SOUTHERN CALIFORNIA FUTURE COMMUNITIES PARTNERSHIP PROGRAM	SOUTHERN CALIFORNIA ASSOCIATION OF GOVT	\$0.00	6
44	MSRC	MS18023	23	WEEKEND FREEWAY SERVICE PATROL	RIVERSIDE CO. TRANSPORTATION COMMISSION	\$0.00	6
44	MSRC	MS18024	23	REGIONAL VAN POOL INCENTIVE PROGRAM	RIVERSIDE CO. TRANSPORTATION COMMISSION	\$0.00	6
44	MSRC	MS18029	23	INSTALL NEW LIMITED ACCESS CNG STATION & TECHNICIAN TRAINING	IRVINE RANCH WATER DISTRICT	\$0.00	6
44	MSRC	MS18115	23	EXPAND EXISTING L/CNG STATION	CITY OF COMMERCE	\$0.00	6
44	MSRC	MS18122	23	INSTALL NEW LIMITED ACCESS CNG INFRASTRUCTURE	UNIVERSAL WASTE SYSTEMS, INC.	\$0.00	6
44	MSRC	MS21002	23	MSRC PROGRAMMATIC OUTREACH SERVICES	BETTER WORLD GROUP ADVISORS	\$0.00	6
44	MSRC	MS21005	23	IMPLEMENT LAST MILE GOODS MOVEMENT PROGRAM	SOUTHERN CALIFORNIA ASSOCIATION OF GOVT	\$0.00	4
44	MSRC	MS21007	23	DEPLOY 5 ZERO-EMISSION YEAR TRACTORS	PENSKE TRUCK LEASING CO LP	\$0.00	11
44	MSRC	MS21013	23	DEPLOY 40 ZERO EMISSION ELECTRIC CLASS 8 SEMI-TRACTORS AND ASSOCIATED CHARGING INFRASTRUCTURE	4 GEN LOGISTICS, LLC	\$0.00	11
44	MSRC	MS21013	23	DEPLOY 40 ZERO EMISSION ELECTRIC CLASS 8 SEMI-TRACTORS AND ASSOCIATED CHARGING INFRASTRUCTURE	4 GEN LOGISTICS, LLC	\$0.00	6
44	MSRC	MS21013	23	DEPLOY 40 ZERO EMISSION ELECTRIC CLASS 8 SEMI-TRACTORS AND ASSOCIATED CHARGING INFRASTRUCTURE	4 GEN LOGISTICS, LLC	\$0.00	11
44	MSRC	MS21014	23	DEPLOY 5 NEAR ZERO EMISSION TRUCKS	GREEN FLEET SYSTEMS, LLC	\$0.00	6
44	MSRC	MS21015	23	DEPLOY UP TO 15 NEAR-ZERO EMISSIONS SEMI-TRACTORS	PREMIUM TRANSPORTATION SERVICES, INC.	\$0.00	6
44	MSRC	MS21018	23	DEPLOY UP TO 23 NEAR ZERO EMISSION TRUCKS	PAC ANCHOR TRANSPORTATION, INC.	\$0.00	6
44	MSRC	MS21019	23	LEASE UP TO 14 ZERO-EMISSION TRUCKS AND PROVIDE CHARGING INFRASTRUCTURE	VOLVO FINANCIAL SERVICES	\$0.00	11
44	MSRC	MS21023	23	INSTALL E/V CHARGING STATION INFRASTRUCTURE	BNSF RAILWAY COMPANY	\$0.00	6
					Subtotal	\$1,211,414.75	
V. TERMINATED CONTRACTS-PARTIAL/NO WORK PERFORMED							
44	TECHNOLOGY ADVANCEMENT OFFICE	C15150	31	INSTALL/UPGRADE 6 HYDROGEN FUELING STATIONS THROUGHOUT THE BASIN	AIR PRODUCTS AND CHEMICALS, INC	-\$118,750.00	7
44	TECHNOLOGY ADVANCEMENT OFFICE	C18129	31	VERSATILE PLUG-IN AUXILIARY POWER SYSTEM DEMONSTRATION	EPRI	-\$20,000.00	7
44	TECHNOLOGY ADVANCEMENT OFFICE	C19414	32	REPLACEMENT OF 2 OFF-ROAD EQUIPMENT	RRM PROPERTIES, LTD	-\$16,010.00	7
44	TECHNOLOGY ADVANCEMENT OFFICE	C20212	77	REPLACEMENT OF 3 OFF-RD EQUIPMENT	SA RECYCLING LLC	-\$121,165.00	7

**South Coast AQMD
Contract Activity Report
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44	TECHNOLOGY ADVANCEMENT OFFICE	C20352	77	REPLACEMENT OF 18 ON-ROAD EQUIPMENT	CITY OF LONG BEACH	-\$31,912.00	7
44	TECHNOLOGY ADVANCEMENT OFFICE	C21063	81	HEAVY DUTY TRUCK REPLACEMENT 1B	PLAIN LEASING INC	-\$600,000.00	7
44	TECHNOLOGY ADVANCEMENT OFFICE	C21115	80	REPLACEMENT OF 7 OFF-ROAD EQUIPMENT	BECKCO, INC	-\$374,432.00	7
44	TECHNOLOGY ADVANCEMENT OFFICE	C21323	79	REPLACEMENT OF 17 ON-ROAD DRAYAGE TRUCKS	USA WASTE OF CALIFORNIA INC	-\$50,000.00	7
44	TECHNOLOGY ADVANCEMENT OFFICE	C21350	79	REPLACEMENT OF 3 ON ROAD DRAY TRUCKS	PACIFIC GREEN TRUCKING INC	-\$85,000.00	7
44	TECHNOLOGY ADVANCEMENT OFFICE	C22047	80	REPOWER 1 ENGINE MARINE VESSEL	TRAVIS EDWARD VAUGHAN	-\$1.00	7
44	TECHNOLOGY ADVANCEMENT OFFICE	C22059	79	REPLACEMENT OF 5 ON-ROAD DUMP TRUCKS	RRM PROPERTIES, LTD	-\$800,000.00	7
44	TECHNOLOGY ADVANCEMENT OFFICE	C22097	79	REPLACEMENT OF 14 ON-ROAD FREIGHT TRUCKS	SYSCO HOLDINGS LLC	-\$1,700,000.00	7
49	TAO CF/1B/CMP	C22328	32	REPLACEMENT OF 8 CARGO & 7 OFF-ROAD EQUIPMENT	SA RECYCLING LLC	-\$83,582.00	7
44	TECHNOLOGY ADVANCEMENT OFFICE	C22360	32	REPLACEMENT OF 63 OFF-ROAD EQUIPMENT	TGI EQUIPMENT CORPORATION	-\$1,732,224.00	7
02	GOVERNING BOARD	C23002	01	BOARD ASSISTANT SERVICES FOR VERONICA PADILLA-CAMPOS	AMY J WONG	-\$2,293.92	7
44	MSRC	ML11029	23	INSTALL LPG FUELING STATION	CITY OF SANTA ANA	-\$187,500.00	7
44	MSRC	ML16040	23	INSTALL E/V CHARGING STATIONS	CITY OF EASTVALE	-\$43,591.00	7
44	MSRC	ML18063	23	EXPAND EXISTING CNG STATION	CITY OF RIVERSIDE	-\$333,610.00	7
44	MSRC	ML18080	23	INSTALL E/V CHARGING STATIONS	CITY OF SANTA MONICA	-\$77,211.00	7
44	MSRC	ML18136	23	PURCHASE 4 LIGHT-DUTY ZERO EMISSION VEHICLES AND INSTALL 1 E/V CHARGING STATION	CITY OF ORANGE	-\$2,500.00	7
44	MSRC	ML18138	23	INSTALL BICYCLE RACKS & E/V STATION	CITY OF LA CANADA FLINTRIDGE	-\$17,411.00	7
44	MSRC	ML18172	23	PUCHASE HD ZERO EMISISON VEHICLE	CITY OF HUNTINGTON PARK	-\$65,450.00	7
44	MSRC	ML18174	23	PURCHASE 1 HD NZ EMISSION VEHICLE	CITY OF BELL	-\$25,000.00	7
44	MSRC	MS14075	23	EXPAND CNG FUELING STATION	FULLERTON JOINT UNION HIGH SCHOOL DIST	-\$6,558.00	7
44	MSRC	MS16110	23	EXPAND CNG FUELING STATION	CITY OF RIVERSIDE	-\$30,000.00	7
44	MSRC	MS18108	23	EXPAND EXISTING CNG STATION	CAPISTRANO UNIFIED SCHOOL DISTRICT	-\$4,250.00	7
44	MSRC	MS18114	23	INSTALL LIMITED ACCESS CNG STATION	COUNTY OF LOS ANGELES	-\$175,000.00	7
44	MSRC	MS18122	23	INSTALL LIMITED ACCESS CNG STATION	UNIVERSAL WASTE SYSTEMS, INC.	-\$5,000.00	7
44	MSRC	MS18175	23	EXPAND PUBLIC ACCESS STATION	UNIVERSITY OF CALIFORNIA - IRVINE	-\$1,000,000.00	7
44	MSRC	MS21004	23	TRANSIT SERVICE TO DODGER STADIUM	LOS ANGELES COUNTY METROPOLITAN	-\$1,374,077.00	7
44	MSRC	MS21011	23	PURCHASE 3 ZERO-EMISS TRACTORS	RDS LOGISTICS GROUP	-\$808,500.00	7
44	MSRC	MS21014	23	DEPLOY 5 NEAR ZERO EMISSIONS TRUCK	GREEN FLEET SYSTEMS, LLC	-\$200,000.00	7
					Subtotal	-\$10,091,027.92	

**South Coast AQMD
Contract Activity Report
July 1, 2022 - June 30, 2023**

DEPT ID	DEPT NAME	CONTRACT NUMBER	FUND CODE	DESCRIPTION	VENDOR NAME	CONTRACT AMOUNT	FOOTNOTE
	SPECIAL FUNDS				FOOTNOTES		
17	ADV. TECH, OUTREACH & EDU FUND				1 NO FIXED VALUE		
22	AIR QUALITY IMPROVEMENT FUND				2 RATES VARY - NO FIXED VALUE		
23	MSRC FUND				3 REVENUE CONTRACT - NO AMOUNT SHOWN		
27	AIR QUALITY INVESTMENT FUND				4 NO COST - COST REALLOCATION		
31	CLEAN FUELS FUND				5 CHANGED TO EMPLOYEE STATUS		
32	CARL MOYER FUND - SB1107 ACCOUNT				6 NO COST- TIME EXTENSION		
33	SCHOOL BUS REPLACEMENT PROGRAM				7 DE-OBLIGATION OF FUNDING		
35	AES SETTLEMENT FUND				8 COMPETITIVE SOLICITATION ISSUED BY ANOTHER GOV AGENCY		
36	RULE 1309.1 PRIORITY RESERVE FUND				9 NO COST - AIR MONITORING/LICENSE		
38	LADWP SETTLEMENT PROJECTS FUND				11 NO COST - CHANGE IN TERMS		
40	NATURAL GAS VEHICLE PARTNERSHIP FUND				12 FEDERAL GOVERNMENT PASS-THRU		
45	CBE/CBO SETTLEMENT AGREEMENT FUND				13 AT DIRECTION OF LEGISLATIVE COMMITTEE		
46	BP ARCO SETTLEMENT FUND				14 OPTIONAL YEAR RENEWAL/MULTI-YR CONTRACT		
48	HEALTH EFFECTS RESEARCH FUND				15 TRUCK GRANT PAID TO CASCADE SIERRA SOLUTIONS		
49	CEQA GHG MITIGATION FUND				16 AMOUNT UTILIZED MAY BE LESS THAN CONTRACT AMOUNT		
52	TRAPAC SCHOOL AIR FILTRATION						
54	RULE 1118 MITIGATION FUND						
56	HEROS II PROGRAM FUND						
57	EL MONTE PARK PROJECT SETTLEMENT FUND						
58	AB1318 MITIGATION FEES FUND						
59	VOUCHER INCENTIVE PROGRAM FUND (VIP)						
61	ADVANCED TECHNOLOGY GOODS MOVEMENT						
67	GHG REDUCTION PROJECTS FUND						
69	LADWP SETTLEMENT PROJECTS FUND						
75	AIR FILTRATION FUND						
76	SO CAL GAS SETTLEMENT FUND						
77	COMMUNITY AIR PROTECTION AB 134 FUND						
79	VW MITIGATION REVENUE FUND						
80	CARL MOYER FUND - AB923 ACCOUNT						
81	PROPOSITION 1B - GOODS MOVEMENT FUND						
83	CLEAN SHIPPING TECH DEMO FUND						
84	ALISO CANYON AIR FILTRATION FUND						
85	ALISO FUND PORTER RANCH SEP FUND						

[↑ Back to Agenda](#)

BOARD MEETING DATE: September 1, 2023

AGENDA NO. 24

REPORT: Status Report on Major Ongoing and Upcoming Projects for Information Management

SYNOPSIS: Information Management is responsible for data systems management services in support of all South Coast AQMD operations. This action is to provide the monthly status report on major automation contracts and planned projects.

COMMITTEE: Administrative, August 11, 2023, Reviewed

RECOMMENDED ACTION:
Receive and file.

Wayne Natri
Executive Officer

RMM:MAH:XC:dc

Background

Information Management (IM) provides a wide range of information systems and services in support of all South Coast AQMD operations. IM's primary goal is to provide automated tools and systems to implement rules and regulations, and to improve internal efficiencies. The annual Budget and Board-approved amendments to the Budget specify projects planned during the fiscal year to develop, acquire, enhance, or maintain mission-critical information systems.

Summary of Report

The attached report identifies the major projects/contracts or purchases that are ongoing or expected to be initiated within the next six months. Information provided for each project includes a brief project description and the schedule associated with known major milestones (issue RFP/RFQ, execute contract, etc.).

Attachment

Information Management Status Report on Major Ongoing and Upcoming Projects During the Next Six Months

ATTACHMENT
September 1, 2023 Board Meeting
Status Report on Major Ongoing and Upcoming Projects for
Information Management

Project	Brief Description	Estimated Project Cost	Completed Actions	Upcoming Milestones
AQ-SPEC Cloud Platform Phase 2	Integrate separate data systems into the AQ-SPEC cloud-based platform to manage data and build interactive data visualizations and data dashboards for web-based viewing	\$313,350	<ul style="list-style-type: none"> • Project Charter released • Task Order issued, evaluated, and awarded • Project kickoff completed • Requirements gathering completed • Fit Gap and data storage analysis completed • Architecture and functional design completed • Work Plan development for Phase 2 completed • Dashboard designs approved • Discovery Phase completed • Proposal for implementation phase received • System Architecture verified 	<ul style="list-style-type: none"> • System development in progress
PeopleSoft Electronic Requisition	This will allow submittal of requisitions online, tracking multiple levels of approval, electronic archival, pre-encumbrance of budget, and streamlined workflow	\$75,800	<ul style="list-style-type: none"> • Project Charter released • Task Order issued, evaluated, and awarded • Requirements gathering and system design completed • System setup and code development, and User Acceptance Testing for Information Management completed • System setup and code development, and User Acceptance Testing completed for Administrative and Human Resources, and Technology Advancement Office completed 	<ul style="list-style-type: none"> • Deploy to IM and AHR divisions • Training and Integrated User Testing for other divisions

Project	Brief Description	Estimated Project Cost	Completed Actions	Upcoming Milestones
Permitting System Automation Phase 2	Enhanced Web application to automate filing of permit applications, Rule 222 equipment and registration for IC engines; implement electronic permit folder and workflow for staff	\$525,000	<ul style="list-style-type: none"> • Board approved initial Phase 2 funding December 2017 • Board approved remaining Phase 2 funding October 5, 2018 • Completed report outlining recommendations for automation of Permitting Workflow • Developed application submittals and form filing for first nine of 32 400-E forms • Completed application submittals and form filing for 23 types of equipment under Rule 222 for User Testing • Deployed to production of the top three most frequently used Rule 222 forms: Negative Air Machines, Small Boilers and Charbroilers • Deployment to stage of Phase 2 additional 12 400-E-XX forms completed • Deployed to production of three additional Rule 222 forms (Tar Pots, Cooling Towers, and Power Washers) • Deployment to production of eight additional Rule 222 forms (Food Ovens, Storage of Odorants, Equipment Used to Store Aqueous Urea Solutions, Asphalt Day Tanker, Asphalt Pavement Heater, Diesel Fueled Boiler, Micro Turbines, and Portable Diesel Fueled Heater) completed. • Deployment to production of the Emergency Internal Combustion Engine (EICE) application completed. 	<ul style="list-style-type: none"> • System Development for Phase 3 of the project (final twelve 400-E-XX forms) • Complete User Acceptance Testing and deployment to production of Phase 1 of the project (first ten 400-E-XX forms) • Complete User Acceptance Testing and deployment to production of next set of Rule 222 forms

Project	Brief Description	Estimated Project Cost	Completed Actions	Upcoming Milestones
Warehouse Indirect Source Rule Online Reporting Portal	Development of online reporting portal for Rule 2305 – Warehouse Indirect Source	\$250,000	<ul style="list-style-type: none"> • Task Order issued • Deployed Phase 1.1 – Warehouse Operations Notification Submittal • Deployed Phase 1.2 – Warehouse Operations Notification Evaluation • Deployed Phase 2 – Early Annual WAIRE Report (EAWR), Initial Site Information Report (ISIR), full Annual WAIRE Report (AWR) • Deployed Phase 3– Final Annual WAIRE Report 	<ul style="list-style-type: none"> • Phase 4 Enhancements
Carl Moyer Program GMS	Development of simplified and streamlined Online Grant Management System (GMS) Portal for Carl Moyer Program	\$116,275	<ul style="list-style-type: none"> • Task Order issued • Phase 1 completed and approved by stakeholder • Solicitation for On-Road projects opened to public • Phase 2 – tasks module enhancement User Acceptance Testing completed • Phase 2 – 30-day Letter User Acceptance Testing for completed • Phase 2 – Clean Air Reporting Log (CARL) Import for Off-Road and On-Road projects User Acceptance Testing completed • Application Status Tracking User Acceptance Testing completed • Evaluation – Messages Module User Acceptance Testing completed • Carl Moyer Program – PA2023-04 opened • Phase 2 – management reports – User Acceptance Testing completed • Phase 2 – Calculations Module development and User Acceptance Testing completed • Phase 2 – Inspection Module forms development completed 	<ul style="list-style-type: none"> • Phase 2 – Inspection Module reports development • Inspection Module User Acceptance Testing • Phase 3 – Planning for Phase 3

Project	Brief Description	Estimated Project Cost	Completed Actions	Upcoming Milestones
Agenda Tracking System	Develop new Agenda Tracking System for submittal, review and approval of Governing Board meeting agenda items	\$250,000	<ul style="list-style-type: none"> • Project initiation completed • Task order issued • Project planning completed • Vision and Scope completed • Task order issued • Project Kick-off completed • Initial User Interface Design completed 	<ul style="list-style-type: none"> • System Architecture design in progress • System Development in progress
PeopleSoft HCM (Human Capital Management) upgrade	Upgrade PeopleSoft HCM product to latest tools and image level to maintain regulatory and functional support	\$180,000	<ul style="list-style-type: none"> • Project initiation completed • Task order issued • System assessment completed • Customization assessment completed • Installation certification completed • Data migration completed 	<ul style="list-style-type: none"> • User Acceptance Testing
Source Test Tracking System (STTS)	Online STSS will keep track of timelines and quantify the number of test protocols and reports received. System will provide an external online portal to submit source testing protocols and reports, track the review process, and provide integration to all other business units. It will also provide an external dashboard to review the status of a submittal.	\$250,000	<ul style="list-style-type: none"> • Project initiation completed • Task Order issued • Project kickoff completed • User requirements gathering for internal users completed • Developed full business process model • Developed screens mock-ups • Reviewed proposed automation with EQUATE Working Group completed • Completed development of all Sprints 1 through 8 • Completed overview of development progress to EQUATE Working Group. • Deploy updated STTS Data Model and move application to stage completed • Internal and external orientation/training for testers completed • Development of all modifications identified by users completed • User Acceptance Testing in stage environment completed 	<ul style="list-style-type: none"> • Complete testing of STTS Portal with regulated community volunteers • Deploy STTS Portal to production

Project	Brief Description	Estimated Project Cost	Completed Actions	Upcoming Milestones
Compliance System	Develop new Compliance System to help streamline the compliance business process	\$450,000	<ul style="list-style-type: none"> • Project initiation • High level requirement gathering completed • Task order issued 	<ul style="list-style-type: none"> • Detailed requirement gathering
Website Upgrade	Upgrade the Website Content Management System to latest version	\$100,000	<ul style="list-style-type: none"> • Project initiation completed • Task order issued • Initial upgrade completed • Proposal for additional enhancement accepted 	<ul style="list-style-type: none"> • Development of enhancements based on industry best practices
Prequalify Vendor List for PCs, Network Hardware, etc.	Establish list of prequalified vendors to provide computer, network, and printer hardware and software, and to purchase desktop computer hardware upgrades	\$300,000		<ul style="list-style-type: none"> • Released RFQQ November 3, 2023 • Approve Vendors List February 2, 2024

Projects that have been completed within the last 12 months are shown below.

Completed Projects

Project	Date Completed
Oracle PeopleSoft Software Support	August 31, 2023
Renewal of OnBase Software Support	July 31, 2023
Air Quality Advisory Enhancement	June 30, 2023
Legal Office System – Phase 2.1	June 7, 2023
WAIRE Program Online Portal – Initial Site Information Report Enhancement	May 26, 2023
Renewal of HP Server Maintenance & Support	April 30, 2023
Purchase of Server and Storage Upgrades	April 30, 2023
Rule 1180 Monitoring Site and Notification Updates	March 30, 2023
WAIRE Program Online Portal – Owner AWR Enhancement	February 22, 2023
Phone System Upgrade	January 28, 2023
Carl Moyer GMS – PA2023-04	January 10, 2023
AB 2766 for reporting year 2021 - 2022	January 3, 2023
WAIRE Program Online Portal – Phase 3	December 31, 2022
Annual Emission Reporting for reporting year 2022	December 31, 2022
Online Application Filing – Eight Additional Rule 222 Forms	December 2, 2022
CLASS Database Software Licensing	November 30, 2022

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BOARD MEETING DATE: September 1, 2023

AGENDA NO. 25

REPORT: Status Report on Regulation XIII – New Source Review

SYNOPSIS: This report presents the state and federal Final Determination of Equivalency for January 2021 through December 2021. The report provides information regarding the status of Regulation XIII – New Source Review in meeting state and federal NSR requirements and shows that South Coast AQMD’s NSR program is in compliance with applicable state and federal requirements from January 2021 through December 2021.

COMMITTEE: Stationary Source, August 18, 2023, Reviewed

RECOMMENDED ACTION:

Receive and file.

Wayne Nastri
Executive Officer

JA:JW:DO:SKT:JL

SUMMARY

South Coast AQMD’s NSR rules and regulations are designed to ensure that emission increases from new and modified sources do not interfere with efforts to attain and maintain the state and federal 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 South Coast AQMD jurisdiction, excluding NO_x and SO_x sources that are subject to Regulation XX – Regional Clean Air Incentives Market (RECLAIM).¹

¹ While the RECLAIM program is different than command and control rules for NO_x and SO_x and 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 adopted by the Board on February 4, 2011, to maintain South Coast AQMD’s ability to issue permits to major sources that require offsets but obtain offset credits from South Coast AQMD’s Priority Reserve under Rule 1309.1 – Priority Reserve, and/or that are exempt from offsets under South Coast AQMD Rule 1304 - Exemptions. Since these sources are not exempt from offsets under the federal Clean Air Act, South Coast AQMD provides offsets from South Coast AQMD’s internal account balances, which have been generated primarily from orphan shutdowns (i.e., emissions reductions from sources that have shut down but did not apply for emission reduction credits). The purpose of this Determination of Equivalency is to show that there are sufficient offsets in the internal account balances to cover sources that used these offsets for the year in question and the offset needs projected for the following two years.

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 2021 PDE was reported to the South Coast AQMD Board at the February 2023 Board meeting and the FDE is required to be reported at the September 2023 Board meeting. Rule 1315 also requires the Executive Officer to aggregate and track offsets debited from and deposited to South Coast AQMD’s internal offset accounts for specified periods between October 1, 1990, and December 31, 2005, and each calendar year from 2006 through 2030 for purposes of making periodic determinations of compliance. The last annual report submitted to the Board on February 3, 2023, presented the PDE for calendar year 2021 and demonstrated that South Coast AQMD’s NSR program continued to meet the state and federal offset requirements for calendar year 2021. 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. The calendar year 2021 FDE contains the cumulative net emission increases through the end of calendar year 2021 and the projected cumulative net emission increases at the end of calendar years 2022 and 2023.

This report, which presents the FDE covering the calendar year 2021 reporting period, demonstrates compliance with state and federal NSR requirements by establishing aggregate equivalence with state and federal offset requirements for sources that were not exempt from state and federal offset requirements, but were either exempt from offsets or obtained their offsets from South Coast AQMD pursuant to Regulation XIII.

The federal offset accounts FDE for calendar year 2021 is summarized in Table 1. Projections of South Coast AQMD's federal offset account balances for January 2022 through December 2022 and January 2023 through December 2023, 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.

The cumulative net emission increase of each nonattainment air contaminant that occurred at major and minor facilities that were issued permits pursuant to Rule 1304 exemptions or Rule 1309.1 Priority Reserve from February 4, 2011, the date of adoption of Rule 1315, through the end of the calendar year 2021 reporting period, as required under Rule 1315(g), is summarized in Table 3. Projections of cumulative net emission increase for January 2022 through December 2022 and January 2023 through December 2023 are summarized in Table 4. These results demonstrate that the cumulative net emission increase, and projections of cumulative net emission increase, of each nonattainment air contaminant remained below the thresholds identified in Table B of Rule 1315(g)(4), 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.

The state offset accounts for calendar year 2021 are summarized in Table 5. This report demonstrates that, for calendar years 2021 through 2023, South Coast AQMD's NSR program continues to meet and is projected to meet state and federal offset requirements and is equivalent² to those requirements on an aggregate basis. The South Coast Air Basin and Coachella Valley was designated as being in attainment with the federal and state CO standard, and therefore South Coast AQMD does not report CO accumulated credits and account balances in this equivalency determination. U.S. EPA designated the South Coast Air Basin as being in attainment with the federal PM10 standard effective July 26, 2013. However, the Coachella Valley has not attained the PM10 National Ambient Air Quality Standards (NAAQS), therefore, South Coast AQMD will continue to track and report PM10 (in the South Coast Air Basin) accumulated credits and account balances for informational purposes only.³

² South Coast AQMD's NSR program is deemed to be equivalent to state and federal offset requirements. South Coast AQMD's ending offset account balances remained positive, indicating there were adequate offsets during this reporting period.

³ Rule 1315 does not distinguish accumulated credits and account balances between designated areas.

Table 1
Federal Offset Accounts FDE for January 2021 through December 2021

DESCRIPTION	VOC	NOx	SOx	PM10
2020 Actual Ending Balance^a (tons/day)	115.55	24.69	5.35	17.74
2021 Discount of Credits for Surplus Adjustment ^b (tons/day)	0.00	-0.12	0.00	0.00
2021 Starting Balance (tons/day)	115.55	24.57	5.35	17.74
2021 Actual Total Debits ^c (lbs./day)	-300	-377	0	0
2021 Actual Total Debits^c (tons/day)	-0.15	-0.19	0.00	-0.01
2021 Actual Total Credits ^c (lbs./day)	5,254	698	299	622
2021 Actual Total Credits^c (tons/day)	2.63	0.35	0.15	0.31
2021 Actual Ending Balance^d (tons/day)	118.03	24.73	5.50	18.04

^a “2020 Actual Ending Balance” is from Table 1 of the 2021 PDE Report dated February 3, 2023.

^b This adjustment is surplus at the time of use discount, which is also discussed in Rule 1315(c)(4).

^c For an explanation of the sources of credits and debits please refer to page 11 of this report, as well as Rule 1315(c) and the February 4, 2011, Rule 1315 staff report. Debits are shown as negative and credits as positive.

^d “2021 Actual Ending Balance” equals the “2020 Actual Ending Balance,” reduced by any surplus adjustments and 2021 actual debits, plus 2021 actual credits.

Table 2
Projections of South Coast AQMD’s Federal Offset Account Balances for
January 2022 through December 2022 and
January 2023 through December 2023

DESCRIPTION	VOC	NOx	SOx	PM10
2021 Actual Ending Balance^a (tons/day)	118.03	24.73	5.50	18.04
2022 Total Projected Debits ^b (lbs./day)	-740	-420	-120	-360
2022 Total Projected Credits ^b (lbs./day)	5,640	1,340	580	1,120
2022 Sum of Projected Debits/Credits^b (lbs./day)	4,900	920	460	760
2022 Sum of Projected Debits/Credits^b (tons/day)	2.45	0.46	0.23	0.38
2022 Projected Ending Balance^c (tons/day)	120.48	25.19	5.73	18.42
2023 Total Projected Debits ^b (lbs./day)	-740	-420	-120	-360
2023 Total Projected Credits ^b (lbs./day)	5,640	1,340	580	1,120
2023 Sum of Projected Debits/Credits^b (lbs./day)	4,900	920	460	760
2023 Sum of Projected Debits/Credits^b (tons/day)	2.45	0.46	0.23	0.38
2023 Projected Ending Balance^d (tons/day)	122.93	25.65	5.96	18.80

^a “2021 Actual Ending Balance” is as shown in Table 1.

^b Projections are based upon the average of the total annual debits and the average of the total annual credits for the five reporting periods most recently included in a PDE or an FDE, pursuant to Rule 1315(e). For an explanation of the sources of debits and credits please refer to page 11 of this report, as well as Rule 1315(c) and the Rule 1315 staff report. Debits are shown as negative and credits as positive, while the sum of debits/credits are shown as negative or positive, as appropriate.

^c “2022 Projected Ending Balance” equals the “2021 Actual Ending Balance” plus the “2022 Sum of Projected Debits/Credits.”

^d “2023 Projected Ending Balance” equals the “2022 Projected Ending Balance” plus the “2023 Sum of Projected Debits/Credits.”

Table 3
Cumulative Net Emission Increase
(February 4, 2011 – December 31, 2021)

DESCRIPTION	VOC	NO _x	SO _x	PM ₁₀
2020 Cumulative Net Emission Increase^a (tons/day)	-24.67	-3.74	-1.88	-1.92
2021 Increases in Potential to Emit ^b (tons/day)	0.23	0.01	0.00	0.01
2021 Decreases in Potential to Emit ^c (tons/day)	-3.05	-0.42	-0.19	-0.38
2021 Cumulative Net Emission Increase^d (tons/day)	-27.49	-4.15	-2.07	-2.29
Rule 1315(g) Table B Threshold (through December of 2021 - tons/day)	13.94	1.00	0.33	2.05

^a “2020 Cumulative Net Emission Increase” is from Table 3 of the FDE report dated September 2, 2022.

^b Increases in potential to emit that occur at major and minor facilities pursuant to Rule 1304 or Rule 1309.1.

^c Decreases in potential to emit that occur at major and minor facilities pursuant to Rule 1304 or Rule 1309.1.

^d “2021 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 over the period of February 4, 2011, through December 31, 2021.

Table 4
Projections of Cumulative Net Emission Increase
January 2022 through December 2022 and
January 2023 through December 2023

DESCRIPTION	VOC	NOx	SOx	PM10
2021 Cumulative Net Emission Increase^a (tons/day)	-27.49	-4.15	-2.07	-2.29
2022 Projected Emission Increase ^b (tons/day)	1.58	0.52	0.13	0.50
2022 Projected Emission Decrease ^b (tons/day)	-3.48	-0.83	-0.37	-0.69
2022 Projected Cumulative Net Emission Increase^c (tons/day)	-29.39	-4.46	-2.31	-2.48
Rule 1315(g) Table B 2022 Threshold (tons/day)	15.21	1.08	0.36	2.24
2023 Projected Emission Increase ^d (tons/day)	1.58	0.52	0.13	0.50
2023 Projected Emission Decrease ^d (tons/day)	-3.48	-0.83	-0.37	-0.69
2023 Projected Cumulative Net Emission Increase^e (tons/day)	-31.29	-4.77	-2.55	-2.67
Rule 1315(g) Table B 2023 Threshold (tons/day)	16.48	1.15	0.39	2.43

^a “2021 Cumulative Net Emission Increase” from Table 3.

^b “2022 Projected Emission Increase” and “2022 Projected Emission Decrease” are the averages of the 2017, 2018, 2019, 2020 and 2021 increases and decreases, respectively, in potential to emit.

^c “2022 Projected Cumulative Net Emission Increase” is the sum of the “2022 Projected Emission Increase” and “2022 Projected Emission Decrease” added to the “2021 Cumulative Net Emission Increase.”

^d “2023 Projected Emission Increase” and “2023 Projected Emission Decrease” are the averages of the 2017, 2018, 2019, 2020 and 2021 increases and decreases, respectively, in potential to emit.

^e “2023 Projected Cumulative Net Emission Increase” is the sum of the “2023 Projected Emission Increase” and “2023 Projected Emission Decrease” added to the “2022 Projected Cumulative Net Emission Increase.”

Table 5**State Offset Accounts FDE for January 2021 through December 2021**

DESCRIPTION	VOC	NOx	SOx	PM10
2021 Actual Starting Balance^a (tons/day)	87.88	35.71	10.05	23.59
2021 Actual Total Debits ^b (tons/day)	-0.99	-0.42	-0.05	-0.03
2021 Actual Total Credits ^b (tons/day)	2.63	0.35	0.15	0.31
2021 Sum of Actual Debits/Credits^b (lbs./day)	3,267	-133	209	568
2021 Sum of Actual Debits/Credits^b (tons/day)	1.63	-0.07	0.10	0.28
2021 Actual Ending Balance^c (tons/day)	89.51	35.64	10.15	23.87

^a “2021 Actual Starting Balance” is from Table 3 of the PDE report dated February 3, 2023.

^b For an explanation of the sources of debits and credits please refer to page 11 of this report.

Debits are shown as negative and credits as positive, while the sums of debits/credits are shown as negative or positive, as appropriate.

^c “2021 Actual Ending Balance” equals the “2021 Actual Starting Balance” plus the “2021 Sum of Actual Debits/Credits”.

Background

South Coast AQMD originally adopted its NSR program in 1976. U.S. EPA approved South Coast AQMD’s NSR program into the SIP initially on January 21, 1981 (46FR5965) and again on December 4, 1996 (61FR64291). U.S. EPA approved the May 3, 2002, Rule 1309.1 amendments into the SIP on June 19, 2006 (71FR35157). The original program has evolved into the current version of the Regulation XIII rules in response to state and federal legal requirements and the changing needs of the local environment and economy. Amendments to the NSR rules were adopted by the 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 South Coast AQMD from taking any action to implement Rule 1315 or the amendments to Rule 1309.1 until it had prepared a new environmental assessment under CEQA. On February 4, 2011, South Coast AQMD adopted a revised and enhanced version of Rule 1315, which included a new CEQA environmental assessment. U.S. EPA approved Rule 1315 into the SIP in 2012 (77FR31200), and this approval was upheld by the U.S. Court of Appeals for the Ninth Circuit Court in 2015.

South Coast AQMD's computerized emission tracking system is used to demonstrate equivalence with state and federal offset requirements on an aggregate basis. Specific NSR requirements of federal and state law are presented below.

Federal Law

Federal NSR requirements vary with respect to the area's attainment status and classification. Based on the current classification for the 1997 8-hour ozone standard, the South Coast Air Basin and the Riverside County portion of the Salton Sea Air Basin (also known as the Coachella Valley) are both extreme nonattainment areas.⁴ For the 2008 and 2015 8-hour ozone standards, South Coast Air Basin and Coachella Valley are classified as extreme nonattainment and severe nonattainment, respectively.⁵ As the NSR requirements are more stringent for a higher nonattainment classification and the more stringent requirements apply, both South Coast Air Basin and Coachella Valley must comply with the requirements for extreme nonattainment areas for ozone precursors (*i.e.*, VOC and NO_x). During the 2021 equivalency period, both the South Coast Air Basin and the Coachella Valley complied with their respective requirements for ozone nonattainment and serious nonattainment for PM₁₀ and its precursors (*i.e.*, VOC, NO_x, and SO_x).⁶ Coachella Valley is considered in attainment for CO. U.S. EPA designated the South Coast Air Basin as in attainment with federal CO standards on June 11, 2007. Starting calendar year 2017, South Coast AQMD stopped reporting CO accumulated credits and account balances in this equivalency determination. Both South Coast Air Basin and Coachella Valley are considered in attainment for SO₂ and NO₂; however, SO_x and NO_x are precursors to pollutants for which both South Coast Air Basin and Coachella Valley are designated as in nonattainment.⁷ The non-Palo Verde, Riverside County portion of the Mojave Desert Air Basin under South Coast AQMD's jurisdiction is unclassifiable. Federal law requires the use of Lowest Achievable Emission Rate (LAER) and offsets for emissions of nonattainment pollutants (or their precursors) for new, modified, and relocated stationary sources,

⁴ In 2019, the SSAB (Coachella Valley) was redesignated to extreme nonattainment for the 1997 8-hour ozone standard.

⁵ South Coast AQMD requested to reclassify the Coachella Valley's nonattainment status from "severe" to "extreme" for the 2008 and the 2015 8-hour ozone standards. The Board adopted a voluntary reclassification request for the 2008 ozone standard on November 4, 2022. The 2022 AQMP adopted by the Board on December 2, 2022 included a reclassification request for the 2015 8-hour ozone standard.

⁶ As of July 26, 2013, South Coast Air Basin was redesignated as in attainment for the federal 24-hour PM₁₀ standard, and U.S. EPA approved a PM₁₀ maintenance plan. South Coast AQMD will continue to track and report PM₁₀ accumulated credits and account balances for informational purposes only in the South Air Basin and for equivalency in the Coachella Valley.

⁷ SO_x is a precursor to PM₁₀ and NO_x is a precursor to both PM₁₀ and ozone.

when the source is considered a major stationary source⁸ for the nonattainment pollutants (or their precursors). This report demonstrates compliance with the federal NSR offsets requirements.

State Law

State law requires the use of BACT for new and modified sources (Health and Safety Code Sections 40440(b)(1) and 40920.5) and "no net increase in emissions" from certain permitted new or modified sources based on their potential to emit and the nonattainment classification of the area in which they are located. This report demonstrates South Coast AQMD's compliance with the "no net emission increase" requirements of state law for the 2021 period by demonstrating compliance with the requirements for extreme ozone nonattainment areas for ozone precursors and with the requirements for serious nonattainment areas for PM10 and precursors to PM10. The South Coast Air Basin was designated as being in attainment with the state CO standards effective June 11, 2007.

Overview of Analysis Methodology

The two most important elements of state and federal nonattainment NSR requirements are BACT/LAER and emission offsetting. As set forth in South Coast AQMD's BACT Guidelines, South Coast AQMD's BACT requirements are at least as stringent as federal LAER for major sources and state BACT requirements for all sources. The NSR emission offset requirements that South Coast AQMD implements through its permitting process ensure that sources provide emission reduction credits (ERCs) to offset their emission increases in compliance with state and federal requirements. As a result, these sources each comply with state and federal offset requirements by providing ERCs. However, certain sources are exempt from South Coast AQMD's offset requirements pursuant to Rule 1304 or qualify for offsets from South Coast AQMD's Community Bank (applications received between October 1, 1990, and February 1, 1996, only) or Priority Reserve, both pursuant to Rule 1309.1. Providing offset exemptions and the Priority Reserve (as well as the previously administered Community Bank) are important to the NSR program and the local economy. Therefore, South Coast AQMD has assumed the responsibility of providing the necessary offsets for exempt sources, the Priority Reserve, and the Community Bank. This report

⁸ The major source thresholds for South Coast Air Basin, Coachella Valley, and non-Palo Verde, Riverside County portion of the Mojave Desert Air Basin, based on their attainment status during the calendar year 2021 reporting period are summarized below:

Pollutant	South Coast Air Basin	Coachella Valley	Non-Palo Verde, Riverside County portion of the Mojave Desert Air Basin
VOC	10 tons/year	10 tons/year	100 tons/year
NOx	10 tons/year	10 tons/year	100 tons/year
SOx	70 tons/year	70 tons/year	100 tons/year
PM10	70 tons/year	70 tons/year	100 tons/year
CO	50 tons/year	100 tons/year	100 tons/year

examines withdrawals from and deposits to South Coast AQMD's emission offset accounts during calendar year 2021 and demonstrates programmatic equivalence on an aggregate basis with state and 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.

South Coast AQMD's Offset Accounts

For the purposes of this report, federal debit and credit accounting for South Coast AQMD 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 dated January 7, 2011. Each of the pollutants subject to offset requirements has a separate federal offset account. State debit and credit accounting for South Coast AQMD offset accounts was similarly conducted, with the difference that state offset requirements apply to all increases of VOC or NO_x from equipment subject to South Coast AQMD's permitting program and to increases of SO_x and PM₁₀ from facilities that emit 15 or more tons per year. South Coast AQMD's NSR program is considered to provide equivalent or greater offsets of emissions as required by state and federal requirements for each subject pollutant provided the balance of offsets in South Coast AQMD's state and federal offset account for each pollutant remains positive, indicating that there were adequate offsets available.

Debit Accounting

Staff 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 debited from South Coast AQMD's federal offset accounts when they occur at major sources. For federal equivalency demonstrations, South Coast AQMD uses an offset ratio of 1.2-to-1.0 for extreme nonattainment pollutants (ozone and ozone precursors, i.e., VOC and NO_x) and uses a 1.0-to-1.0 ratio for all other nonattainment pollutants (non-ozone precursors, i.e., SO_x and PM₁₀) to offset any such increases. That is, 1.2 pounds are deducted from South Coast AQMD offset accounts for each pound of maximum allowable permitted potential to emit VOC or NO_x increase at a major source and 1.0 pound is deducted for each pound of maximum allowable permitted potential to emit SO_x or PM₁₀ at a major source. A more detailed description of federal debit accounting is provided in the Rule 1315 staff report dated January 7, 2011, and Rule 1315(c)(2).

To comply with U.S. EPA's NSR Reform requirements applicable to extreme nonattainment areas for ozone, the South Coast AQMD tracks changes to facility-wide limits under Rule 1304 exemptions and debits any increases from the federal offset accounts accordingly.

State offset requirements are based on actual emissions rather than maximum allowable permitted potential to emit. South Coast AQMD methodology uses actual emissions as

eighty percent of permitted potential to emit.⁹ Thus, 0.8 pounds is debited from South Coast AQMD's state accounts for each pound of maximum allowable permitted emissions increase.

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 included in an AQMP control measure that has been assigned a target implementation date,¹⁰ 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 South Coast AQMD or has a "positive NSR balance" (i.e., pre-1990 net emission increase), the quantity of South Coast AQMD offsets used or the amount of the positive NSR balance is subtracted from the reduction and "paid back" to South Coast AQMD'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 South Coast AQMD'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 South Coast AQMD's federal offset accounts. A more detailed description of federal credit accounting is provided in Rule 1315(c)(3)(A) and its staff report dated January 7, 2011.

Determination of Equivalency with Federal Offset Requirements

Figure 1 illustrates South Coast AQMD's federal offset account balances for calendar years 1990 and after.¹¹ The calendar year 2021 balances are based on final determinations.

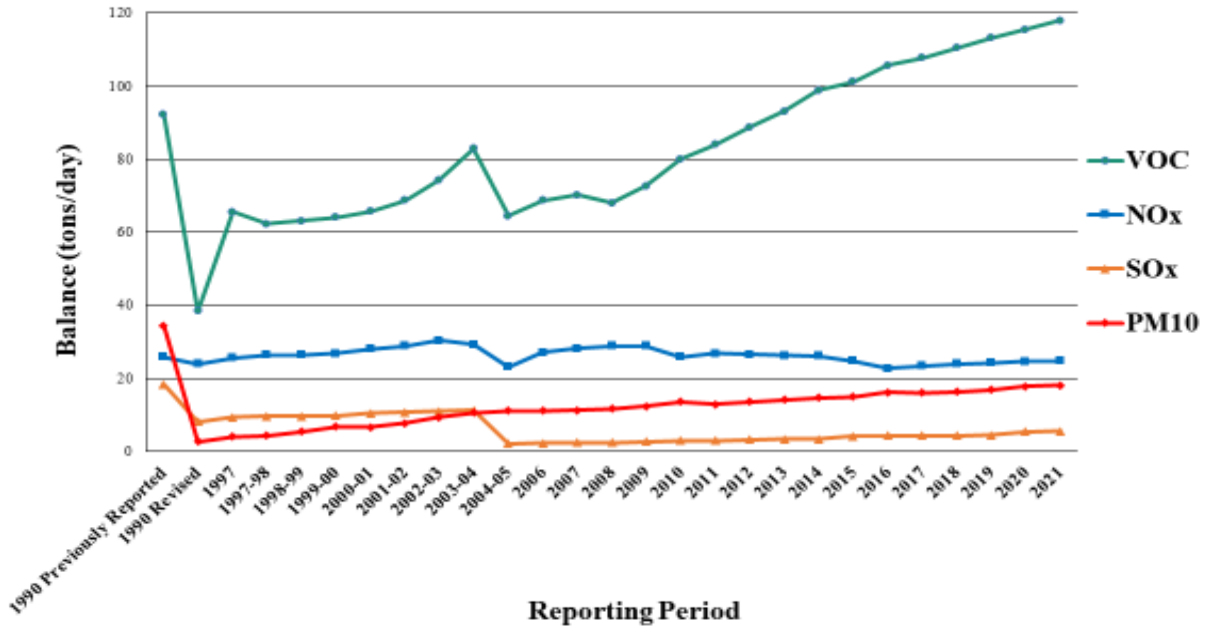
⁹ See Status Report on Regulation XIII – New Source Review dated April 2, 2004.

¹⁰ Refer to Rule 1309(b) for a complete explanation of eligibility requirements.

¹¹ The 1990 and 2005 drops in federal account balances are due to the initial removal of pre-1990 balance and the 2005 removal of the remaining pre-1990 balance.

Figure 1

South Coast AQMD's Federal Offset Account Balances (1990 – 2021)



The federal offset requirements FDE for calendar year 2021 and the projections for calendar years 2022 and 2023 are summarized in Tables 1 and 2, respectively. The detailed listing of actual final withdrawals, deposits and sum of withdrawals and deposits are shown in Tables A, B, and C of Attachment 1 to this letter; the account balances shown in Tables A and B reflect the tracking sequence described under Rule 1315(c)(5).

California Environmental Quality Act Backstop Provisions

In addition to the equivalency demonstration with the federal offset requirements, Rule 1315(g) requires the tracking of all increases in potential to emit and emission reductions that occur at major and minor facilities and ensure that the cumulative net emission increases in any given year remain below the thresholds, established in Rule 1315.

Pursuant to Rule 1315(g)(1), net emission increases of nonattainment air contaminants at major and minor facilities are based on the sum of aggregate increases in potential to emit and aggregate emissions reductions at major and minor facilities pursuant to Rule 1304 or Rule 1309.1.

Aggregate 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.

Aggregate emissions reductions 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.

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 for each of the reporting periods commencing with the 2011 reporting period, whichever is fewer reporting periods. For calendar year 2021 FDE, the averages are based on the 2017, 2018, 2019, 2020 and 2021 aggregate increases in potential to emit and aggregate 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 increases 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 2021, South Coast AQMD's NSR program provides equivalent offsets to those required by state and federal NSR requirements. The program is at least equivalent to the state and federal requirements on an aggregate basis. This conclusion is based on the fact that the final ending state and federal offset account balances for this calendar year reporting period, as shown in Tables 1 and 5, remained positive for all pollutants.
- South Coast AQMD's projected federal offset account balances for 2022 and 2023 are projected to remain positive. This means that the sum of the estimated withdrawals from and deposits to South Coast AQMD's federal offset accounts during 2022 and 2023 are projected to remain positive, and therefore, demonstrates that South Coast AQMD's NSR program is equivalent to federal NSR requirements, as show in Table 2.

- From the date of adoption of Rule 1315 (February 4, 2011) to the end of calendar year 2021, both the cumulative net emission increase of each nonattainment air contaminant at major and minor facilities and the projected cumulative net emission increase for 2022 and 2023 remained below the thresholds identified in Table B of Rule 1315. 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, as shown in Tables 3 and 4.

ATTACHMENT

Detailed Listing of Actual Debits, Actual Credits, and Sum of Debits and Credits

ATTACHMENT 1

Detailed Listing of Actual Debits, Actual Credits, and Sum of Debits and Credits

Table A
Total Actual Debits from South Coast AQMD's Federal Offset Accounts
(January 2021 through December 2021)

SOUTH COAST AQMD OFFSETS USED	VOC	NO_x	SO_x	PM₁₀
Priority Reserve (lbs./day)	-137	-167	0	-21
Community Bank (lbs./day)	0	0	0	0
Rule 1304 Exemptions (lbs./day)	-113	-147	0	0
Sum Total of South Coast AQMD Offsets (lbs./day)	-250	-314	0	-21
1.2-to-1.0 Offset Ratio (lbs./day)	-50	-63	N/A	N/A
Total Actual Debits to South Coast AQMD Account (lbs./day)	-300	-377	0	-21
Total Actual Debits to South Coast AQMD Account (tons/day)	-0.15	-0.19	0	-0.01

Table B
Total Actual Credits to South Coast AQMD’s Federal Offset Accounts
(January 2021 through December 2021)

SOUTH COAST AQMD CREDITS RECEIVED	VOC	NOx	SOx	PM10
Major Source Orphan Credits (lbs./day)	700	143	0	0
Minor Source Orphan Credits (lbs./day)	5,868	730	374	777
Total Orphan Credits (lbs./day)	6,568	873	374	777
Adjustment to Actual Emissions ^a (lbs./day)	-1,314	-175	-75	-155
Discount of ERCs ^b (lbs./day)	0	0	0	0
Creditable Minor Source ERC Use (lbs./day)	0	0	0	0
Creditable Major Source ERC Use (lbs./day)	0	0	0	0
Total Actual Credits to South Coast AQMD Account (lbs./day)	5,254	698	299	622
Total Actual Credits to South Coast AQMD Account (tons/day)	2.63	0.35	0.15	0.31

^a Adjustment of orphan shutdown and orphan reduction offset credits deposited in South Coast AQMD offset accounts to correct from potential emissions to actual emissions as discussed in Rule 1315(c)(3)(B)(i).

^b 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 South Coast AQMD’s Federal Offset Accounts
(January 2021 through December 2021)

DESCRIPTION	VOC	NOx	SOx	PM10
Total Actual Debits ^a (lbs./day)	-300	-377	0	-21
Total Actual Credits ^a (lbs./day)	5,254	698	299	622
Sum of Actual Debits(-)/Credits(+)^a (lbs./day)	4,954	321	299	601
Sum of Actual Debits(-)/Credits(+)^a (tons/day)	2.48	0.16	0.15	0.30

^a Debits are shown as negative and credits as positive, while their sum is shown as negative or positive, as appropriate.

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BOARD MEETING DATE: September 1, 2023

AGENDA NO. 26

REPORT: Administrative Committee

SYNOPSIS: The Administrative Committee held a hybrid meeting on Friday, August 11, 2023. The following is a summary of the meeting.

RECOMMENDED ACTION:
Receive and file.

Vanessa Delgado, Chair
Administrative Committee

SN:cb

Committee Members

Present: Chair Vanessa Delgado, Committee Chair
Vice Chair Michael Cacciotti
Board Member Gideon Kracov
Supervisor V. Manuel Perez

Call to Order

Chair Delgado called the meeting to order at 10:15 a.m.

For additional details of the Administrative Committee Meeting, please refer to the [Webcast](#).

DISCUSSION ITEMS:

1. **Board Members' Concerns:** Vice Chair Cacciotti inquired about compensation for Board Members that has not changed since the 1980s. Wayne Nastri, Executive Officer, indicated staff is working on it.
2. **Chair's Report of Approved Travel:** Travel was reported for Board Member Kracov to Monterey, California to attend the ASILOMAR meeting and to Tahoe, Nevada to attend CCEEB's Summer Issues Seminar. Travel was also reported for Board Member Kracov and Vice Chair Cacciotti to Tahoe, Nevada to attend the Redwood Battery Recycling Facility tour.

3. **Report of Approved Out-of-Country Travel:** Travel was reported for Chair Delgado, Vice Chair Cacciotti, Board Member Kracov, Mr. Nastri, Aaron Katzenstein, Mei Wang, and Ian MacMillan to Europe to visit MAN Energy Systems and Ports Tour in Rotterdam and Antwerp.
4. **Review September 1, 2023 Governing Board Agenda :** Mr. Nastri noted that Proposed Amended Rule 1405 which establishes requirements to further reduce Ethylene Oxide emissions will be Set for Hearing in October. Staff will also be providing a Rail Update to the public and the Public Hearing on Proposed Amended Rule 1178 for refinery storage tanks and Proposed Amended Rule 1111 for residential gas furnaces.

Chair Delgado commented that a lot of feedback has been received regarding the Ethylene Oxide item. For additional information please refer to the [Webcast at 5:59.](#)

5. **Approval of Compensation for Board Member Assistant(s)/Consultant(s):** There was one proposal, this item has been moved to Action Items.
6. **Update on South Coast AQMD Inclusion, Diversity and Equity Efforts:** Cessa Heard-Johnson, Diversity, Equity & Inclusion Officer, provided an update on agency efforts, seasonal events, cultural displays, upcoming statewide working group, and mentioned Frida Kahlo for Fabulous Female Friday.

Board Member Kracov acknowledged the success of the Board Member Internship program.

Harvey Eder, Public Solar Power Coalition, provided public comment regarding environmental social governance.

Mr. Nastri commented that there are principles that businesses must adhere to and that we try to be technology neutral and look at the cleanest technologies that are available, while focusing on environmental justice. For additional information please refer to the [Webcast at 7:16.](#)

7. **Status Report on Major Ongoing and Upcoming Projects for Information Management:** Ron Moskowitz, Chief Information Officer, Information Management, reported that an enhancement for a legal office system to further streamline journal assignments and enforcement modules was successfully deployed. Fiscal year-end activities were completed with Finance and Human Resources, as well as establishing the new DEI and Community Air Program Division for the new fiscal year. Enhancements to the firewall and authentication module for document management system were also deployed as part of the

continuous effort to improve the agency's cyber security. For additional information please refer to the [Webcast at 19:50](#).

8. **South Coast AQMD 's FY 2022-23 Fourth Quarter Ended June 30, 2023 Budget vs. Actual (Unaudited) :** Sujata Jain, Chief Financial Officer, Finance, presented a general fund overview which included revenues, expenditures, use of fund balance and a five-year projection. For additional information please refer to the [Webcast at 20:38](#).
9. **Report of RFQs/RFPs Scheduled for Release in September :** Ms. Jain reported that this is a routine item to issue an RFP for cafeteria services for a contract that expires April 30, 2024. For additional information please refer to the [Webcast at 25:07](#).

ACTION ITEM S:

5. **Approval of Compensation for Board Member Assistant(s)/Consultant(s):** There was one proposal for Councilmember Nithya Raman's Board Assistant, Jackson Guze: a contract modification for July 1, 2023 to June 30, 2024, and a new contract for Fiscal Year 2023-24.

Moved by Cacciotti; seconded by Kracov, unanimously approved.

Ayes: Cacciotti, Delgado, Kracov, Perez
Noes: None

10. **Appropriate Funds and Amend Contract with Strumwasser & Woocher, LLP to Provide Representation and Advice to South Coast AQMD Hearing Board:** Susan Nakamura, Chief Operating Officer, reported that in December 2022, a contract was approved with Strumwasser & Woocher, LLP for specialized legal counsel and services for the Hearing Board \$125,000. This item is requesting an additional \$300,000 for legal representation on a matter involved with the hearing board and the funds are necessary to ensure outside counsel is available to the Hearing Board.

Board Member Kracov inquired if the additional funds are for litigation counsel or internal advice to the Hearing Board. Bayron Gilchrist, General Counsel, indicated that it is our understanding that it is primarily for litigation related to the Baker matter. Board Member Kracov wanted to confirm that the Hearing Board had its own counsel defending itself in court on the Baker case. Mr. Gilchrist confirmed that it is our understanding. Board Member Kracov inquired who reviews these bills. Mr. Gilchrist stated that he believes the Chair for the Hearing Board would but could not confirm. Board Member Kracov expressed understanding of the independence of the Hearing Board and suggested more

paperwork submissions and more things on consent to help the Hearing Board work more efficiently and incur less legal costs. For additional information please refer to the [Webcast at 25:41](#).

Moved by Cacciotti; seconded by Delgado, unanimously approved.

Ayes: Cacciotti, Delgado, Kracov, Perez
Noes: None

- 11. **Appropriate Funds from the Undesignated (Unassigned) Fund Balance for Permitting Enhancement Program :** Jason Aspell, Deputy Executive Officer, Engineering & Permitting, reported that this item is to appropriate \$400,000 from the Undesignated Fund to the Engineering & Permitting budget to cover the cost to continue the efforts to enhance the permitting program by having retirees provide temporary assistance, while the staff vacancy rate is being actively addressed. This effort was successfully utilized last year and looking to continue this effort.

Chair Delgado expressed her support for this continuous effort. For additional information please refer to the [Webcast at 31:01](#).

Moved by Cacciotti; seconded by Perez, unanimously approved.

Ayes: Cacciotti, Delgado, Kracov, Perez
Noes: None

Appropriate Funds and Issue Solicitations and Purchase Orders to Implement Air Quality Community Training in Eastern Coachella Valley : Dr. Heard-Johnson reported that this item is to appropriate the remaining balance of \$41,396 to the DEI with Community Air Programs and \$6,258 to Monitoring & Analysis for Fiscal Year 2023/24 and 2024/25 budgets to issue solicitation and purchase orders. This item involves a grant received from U.S. EPA to implement an air quality academy and improve environmental literacy and air quality data for the Eastern Coachella Valley.

Supervisor Perez inquired about ensuring accountability to how the education will be utilized in the community and suggested building a partnership and working together with the community instead of just providing information and hoping they learn from it. Dr. Heard-Johnson indicated this is an effort to go into the communities and listen to them, to not make it transactional and be involved and engaged and it will be a dialogue so it will be learning on both ends and would be able to provide some metrics as they continue to do this. Supervisor Perez confirmed he would like to see metrics for these programs in order to measure success. For additional information please refer to the [Webcast at 32:49](#).

Moved by Perez; seconded by Cacciotti, unanimously approved.

Ayes: Cacciotti, Delgado, Kracov, Perez

Noes: None

12. **Approve Revisions to Class Specifications; Amend the Salary Resolution to Revise Salaries as Part of the Revision Process; Amend FY 2023-24 Budget By Adding and Deleting Positions to Address Operational Needs** : John Olvera, Deputy Executive Officer, Administrative & Human Resources, reported that this item involves recommendations based on a review of job duties and responsibilities for positions in the Clerk of the Board's office and the General Counsel's office. The first group of recommendations comes with revisions to class specifications for the Clerk of the Board's office to reflect their current job duties and responsibilities, in connection this salary adjustments are being proposed for the updated positions. The second group of recommendations seeks to move implementation responsibilities for our Minor Source Penalty Assessment Program from the Investigator Group to the Paralegal Group in the General Counsel's office to provide efficiencies to the settlement process. The investigators of this group will be moved into the office of Compliance & Enforcement and their work will focus on civil and criminal prosecution matters as part of this reorganization. Salary adjustments are being proposed for the Paralegal, Senior Paralegal and the Supervising Air Quality Inspector position. Finally, there are add and delete recommendations in this item for positions in the General Counsel's office to amend the budget and this will minimize the financial impact of these proposals.

Vice Chair Cacciotti brought Board Member Kracov's earlier comments about the Clerk of the Board and asked for a quick overview of the Hearing Board 's responsibilities and if there is an intersection that we try to avoid. Mr. Olvera stated that it is actually a recognition of the responsibilities of the Clerk of the Board helping both Boards. The roles of the Clerk 's Office is to provide much more support to the individual members, especially on the Hearing Board.. Board Member Kracov asked about more resources for the Clerk of the Boards . Mr. Olvera responded that staff has been holding off on recruiting and filling several positions until these revised classifications were approved.

Board Member Kracov expressed support for the discussion and mentioned how the Clerk of the Board's office is high performing at an intense, heavy pace and is the foundation for the agency. For additional information please refer to the [Webcast at 37:47](#).

Moved by Kracov; seconded by Cacciotti, unanimously approved.

Ayes: Cacciotti, Delgado, Kracov, Perez

Noes: None

13. **Transfer and Appropriate Funds for Independent Audit of Rule 1180 Fenceline Air Monitoring Network:** Jason Low, Deputy Executive Officer, Monitoring & Analysis, reported that this item is for funding a contractor approved by the Board earlier this year to do the independent audit for the referee fenceline air monitoring network required under Rule 1180. This action is to transfer and appropriate \$700,000 from the Rule 1180 Special Fund and appropriate \$500,000 from the General Fund to the Monitoring & Analysis budget for that technical audit effort. For additional information please refer to the [Webcast at 14:23](#).

Moved by Cacciotti; seconded by Kracov, unanimously approved.

Ayes: Cacciotti, Delgado, Kracov, Perez
Noes: None

15. **Appropriate Funds, Issue Solicitations and Purchase Orders for Air Monitoring and Laboratory Equipment:** Dr. Low reported that this item is to purchase air monitoring and laboratory equipment for supporting AB 617 efforts, appropriate \$350,000 from the General Fund to the Monitoring & Analysis budget, purchase air monitoring equipment to support ethylene oxide measurement efforts. For additional information please refer to the [Webcast at 43:30](#).

Moved by Cacciotti; seconded by Perez, unanimously approved.

Ayes: Cacciotti, Delgado, Kracov, Perez
Noes: None

16. **Recognize Revenue, Appropriate Funds, Issue Solicitations and Purchase Orders for Air Monitoring Equipment :** Dr. Low reported that this item is to recognize revenue of \$650,000 from U.S. EPA, appropriate these funds to both the Monitoring & Analysis and Compliance & Enforcement divisions fiscal budgets for the next two years, issue solicitations and purchase orders for air monitoring equipment. For additional information please refer to the [Webcast at 14:17](#).

Moved by Cacciotti; seconded by Kracov, unanimously approved.

Ayes: Cacciotti, Delgado, Kracov, Perez
Noes: None

WRITTEN REPORT :

17. **Local Government & Small Business Assistance Advisory Group Minutes for the April 14, 2023 Meeting:** The report was acknowledged and received.

OTHER MATTERS:

18. **Other Business:** There was no other business to report.
19. **Public Comment:** Mr. Eder provided public comment regarding issues unrelated to the Administrative Committee matters. For additional information please refer to the [Webcast at 46:34](#).
20. **Next Meeting Date:** The next regular Administrative Committee meeting is scheduled for Friday, September 8, 2023 at 10:00 a.m.

Adjournment

The meeting was adjourned at 11:03 a.m.



South Coast Air Quality Management District

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

LOCAL GOVERNMENT & SMALL BUSINESS ASSISTANCE ADVISORY GROUP FRIDAY, APRIL 14, 2023 MEETING MINUTES

MEMBERS PRESENT:

South Coast AQMD Board Members:
Councilmember Carlos Rodriguez, LGSBA Chair
Mayor Patricia Lock Dawson
Supervisor Curt Hagman
Councilmember Jose Luis Solache

Public Members

Paul Avila, P.B.A. & Associates
Geoffrey Blake, Metal Finishers of Southern California
Todd Campbell, Clean Energy
Bill LaMarr, California Small Business Alliance
Rita Loof, RadTech International
Eddie Marquez, Roofing Contractors Association
David Rothbart, Los Angeles County Sanitation Districts

MEMBERS ABSENT:

Felipe Aguirre
John DeWitt, JE DeWitt, Inc.
LaVaughn Daniel, DancoEN

OTHERS PRESENT:

Mark Abramowitz
Harvey Eder
Teresa Garcia
Linda Krupa
Elaine Morgan
Mark Taylor, Board Member Consultant (*Rodriguez*)

SOUTH COAST AQMD STAFF:

Susan Nakamura, Chief Operating Officer
Derrick Alatorre, Deputy Executive Officer
Anissa Heard-Johnson, Deputy Executive Officer
Aaron Katzenstein, Deputy Executive Officer
Sarah Rees, Deputy Executive Officer
Lisa Tanaka O'Malley, Assistant Deputy Executive Officer

Daphne Hsu, Principal Deputy District Counsel
Mark Henninger, Information Technology Manager
Walter Shen, Planning and Rules Manager
Tom Lee, Program Supervisor
Alyssa Yan, Program Supervisor
Elaine-Joy Hills, Senior Staff Specialist
Van Doan, Air Quality Specialist
Paul Wright, Senior Information Technology Specialist
De Groeneveld, Senior Information Technology Specialist
Kristina Voorhees, Assistant Air Quality Specialist
Cindy Bustillos, Executive Secretary
Brisa Lopez, Administrative Assistant

Agenda Item #1 – Roll Call/Call to Order/Opening Remarks

Chair Carlos Rodriguez called the meeting to order at 11:30 a.m., roll call was taken and a quorum was present.

Daphne Hsu, Principal Deputy District Counsel, Legal, stated that LaVaughn Daniel and John DeWitt would not be able to participate in the meeting as an Advisory Group member from a remote location that was not noticed pursuant to Brown Act. Ms. Daniel and Mr. DeWitt could observe the meeting as a member of the public.

For additional details of the Local Government and Small Business Assistance (LGSBA) Advisory Group Meeting, please refer to the [Webcast](#), beginning at 0:37.

Agenda Item #2 – Approval of March 10, 2023 Meeting Minutes

Chair Rodriguez called for approval of the March 10, 2023 meeting minutes.

There were no public comments.

Motion to approve minutes made by Supervisor Curt Hagman; seconded by Geoffrey Blake; approved.

Ayes: Avila, Blake, Hagman, LaMarr, Rodriguez, Rothbart

Noes: None

Abstained: Campbell, Dawson, Marquez, Solache

Absent: Aguirre, Daniel, DeWitt, Loof

For additional details, please refer to the [Webcast](#), beginning at 2:45.

Agenda Item #3 – Review of Follow-Up and Action Items

Derrick Alatorre reviewed action items from the March 10, 2023, meeting.

There were no public comments.

For additional details, please refer to the [Webcast](#), beginning at 6:25.

Agenda Item #4 – Update on South Coast AQMD Mobile Source Incentive Programs

Alyssa Yan, Program Supervisor, Technology Advancement Office, provided an overview on South Coast Air Quality Management District (South Coast AQMD) mobile source incentive programs.

Mr. Avila asked if the Volkswagen Mitigation program only applied to cars. Ms. Yan confirmed that was correct. Mr. Avila asked if the funds could be used to repair the engines and inoperable refrigeration units. Tom Lee, Program Supervisor, Technology Advancement Office, replied that inoperable equipment are ineligible for the program.

David Rothbart asked how fund allocation is determined with a limited budget and if cost-effectiveness and alternative fuel technologies are considered. Ms. Yan replied that cost-effectiveness is considered for project rankings. Aaron Katzenstein, Deputy Executive Officer, Technology Advancement Office, stated that the guidelines for Carl Moyer program specifies the cost-effectiveness in dollars-per-ton.

Todd Campbell, Ms. Yan, and Dr. Katzenstein discussed Advanced Clean Fleet (ACF) regulation, funding allocation, and project prioritization.

Bill LaMarr asked if incentive programs are different from emission reduction credits (ERCs). Susan Nakamura, Chief Operating Officer, indicated that incentive fundings are used for quantifiable emission reductions under current regulations and not for compliance with future emission limits.

Geoffrey Blake asked about total emission reduction difference between zero-emission and near-zero-emission technologies with the limited budget. Walter Shen, Planning and Rules Manager, Technology Advancement Office, replied that the cost-effectiveness and emission benefits for transitioning from diesel to zero-emission busses is greater than use of other fuel types, such as compressed natural gas (CNG) or liquified natural gas (LNG). Mr. Blake asked how many busses could be converted to CNG using \$22M. Dr. Katzenstein stated that CNG busses costs approximately \$160K and zero-emission busses costs approximately \$370K and the school districts are allowed to select the type of busses to purchase.

Mr. Avila asked if it is possible to combine funding from different incentive programs to fund the same project. Dr. Katzenstein replied that stacking of different funds are possible, depending on the program requirements.

Councilmember Jose Luis Solache asked for a list of schools in Los Angeles County that have received funding.

***Action Item #1:** Provide the Advisory Group with a list of schools in LA County that have received funding for busses.*

Councilmember Solache mentioned a discussion on ACF regulation and asked if there are any incentive funding for small businesses. Dr. Katzenstein replied that the Voucher Incentive Program (VIP) is designed for independent owner or operators with 10 or less vehicles.

Mr. Campbell asked how much funding is allocated for VIP. Dr. Katzenstein replied \$8M is currently allocated to VIP and increased funds could be requested as necessary.

Harvey Eder commented on particulate matter, ozone, and contingency measures.

For additional details on the presentation and discussions, please refer to the [Webcast](#), beginning at 8:20.

Agenda Item #5 – Update on Draft Letter from LGSBA Advisory Group to Administrative Committed on CARB’s Community Air Protection Blueprint

Mr. Alatorre stated since there are four Governing Board (GB) members on the LGSBA Advisory Group and the Administrative Committee, the recommendation stated in the draft letter would be presented to the Governing Board, instead of the Administrative Committee.

Rita Loof asked for clarification on the process to submit the letter of recommendation from the Advisory Group. Chair Rodriguez confirmed that Governing Board approval is needed.

Mr. LaMarr referenced paragraph #2 of the draft letter and suggested to add additional details. Chair Rodriguez and Mr. Alatorre suggested that Mr. LaMarr and Ms. Loof edit the draft letter and provide an update at the next meeting.

Councilmember Solache expressed support for the letter.

There were no public comments.

For additional details, please refer to the [Webcast](#), beginning at 54:45.

Agenda Item #6 – Other Business

Ms. Loof stated that the proposed South Coast AQMD budget will include an increase on all fees.

For additional details, please refer to the [Webcast](#), beginning at 1:05:20.

Agenda Item #7 – Public Comment

There were no public comments.

Agenda Item #8 – Next Meeting Date

The next regular LGSBA Advisory Group meeting is scheduled for Friday, June 9, 2023, at 11:30 a.m.

Adjournment

The meeting adjourned at 12:38 p.m.

[↑ Back to Agenda](#)

BOARD MEETING DATE: September 1, 2023

AGENDA NO. 27

REPORT: Legislative Committee

SYNOPSIS: The Legislative Committee held a hybrid meeting on Friday, August 11, 2023. The following is a summary of the meeting.

RECOMMENDED ACTION:
Receive and file.

Michael A. Cacciotti, Chair
Legislative Committee

DJA:LTO:PFC:ar

Committee Members

Present: Vice Chair Michael A. Cacciotti, Committee Chair
Mayor Patricia Lock Dawson
Supervisor Curt Hagman
Supervisor V. Manuel Perez
Councilmember Nithya Raman
Councilmember José Luis Solache

Absent: None

Call to Order

Committee Chair Michael Cacciotti called the meeting to order at 9:00 a.m.

DISCUSSION/ACTION ITEM:

- 1. Execute Contract(s) for Legislative Representation in Sacramento, California**
On May 5, 2023, the Board approved release of an RFP for legislative representation in Sacramento, California. Four separate proposals were received from Actum, LLC, California Advisors, LLC, Joe A. Gonsalves & Son, and The Monares Group.

The Legislative Committee conducted interviews with the four entities that submitted proposals: Actum, LLC, California Advisors, LLC, Joe A. Gonsalves & Son, and The Monares Group. For additional information, please refer to the Webcast beginning at 5:40.

As a result of the above interviews, the Legislative Committee recommended approval of the execution of contracts with California Advisors, LLC for \$143,836, and Joe A. Gonsalves & Son for \$143,836 for legislative representation in Sacramento, California. The Legislative Committee also recommended staff look into other options and come back with further recommendations including possibly hiring a third lobbying firm for legislative representation in Sacramento, California for South Coast AQMD. For additional information, please refer to the Webcast beginning at 43:41.

Moved by: Hagman, Second by: Raman
Ayes: Cacciotti, Dawson, Hagman, Perez, Raman, Solache
Noes: None
Abstain: None
Absent: None

Harvey Eder, Public Solar Power Coalition, commented that the Public Solar Coalition has been around for about 50 years and public power is needed. It is important to educate people.

DISCUSSION ITEMS:

2. Update and Discussion on Federal Legislative Issues

South Coast AQMD's federal legislative consultants (Kadesh & Associates, Carmen Group, Cassidy & Associates) provided written reports on key Washington, D.C. issues.

There was no public comment.

3. Update and Discussion on State Legislative Issues

South Coast AQMD's state legislative consultants (Joe A. Gonsalves & Son, Resolute, California Advisors, LLC) provided written reports on key issues in Sacramento.

There was no public comment.

OTHER MATTERS:

4. Other Business

There was no other business to report.

5. Public Comment Period

Mr. Eder provided public comment that was not on any subject relevant to the Committee or within the Committee’s authority that was not on the agenda.

6. Next Meeting Date

The next regular Legislative Committee meeting is scheduled for Friday, September 8, 2023, at 9:00 a.m.

Adjournment

The meeting adjourned at 10:12 a.m.

Attachments

1. Attendance Record
2. Update on Federal Legislative Issues – Written Reports
3. Update on State Legislative Issues – Written Reports

ATTACHMENT 1

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT LEGISLATIVE COMMITTEE MEETING ATTENDANCE RECORD – August 11, 2023

Council Member Michael Cacciotti..... South Coast AQMD Board Member
Mayor Patricia Lock Dawson..... South Coast AQMD Board Member
Supervisor Curt Hagman..... South Coast AQMD Board Member
Supervisor V. Manuel Perez..... South Coast AQMD Board Member
Council Member Nithya Raman..... South Coast AQMD Board Member
Council Member José Luis Solache South Coast AQMD Board Member

Uduak-Joe Ntuk..... Board Consultant (Kracov)
Mark Taylor..... Board Consultant (Rodriguez)
Ben Wong..... Board Consultant (Cacciotti)

Ross Buckley California Advisors, LLC
Paul Gonsalves Joe A. Gonsalves & Son
Gary Hoitsma Carmen Group, Inc.
Ben Miller Kadesh & Associates
Amelia Morales Cassidy & Associates
David Quintana..... Resolute

Mark Abramowitz..... Public
Kimberly Caceres Public
Ramine Cromartie..... Public
Harvey Eder..... Public Solar Power Coalition
Victor Ibarra Public
Adam Keigwin..... Public
Bill La Marr..... Public
Dan McGivney Public
Jacqueline Moore..... Public
Kristy Monji Public
Patty Senecal Public

Derrick Alatorre..... South Coast AQMD Staff
Debra Ashby South Coast AQMD Staff
Cindy Bustillos South Coast AQMD Staff
Lara Brown..... South Coast AQMD Staff
Maria Corralejo South Coast AQMD Staff
Philip Crabbe..... South Coast AQMD Staff
Iliana Garcia South Coast AQMD Staff
Bayron Gilchrist South Coast AQMD Staff
Sheri Hanizavareh South Coast AQMD Staff
Anissa Cessa Heard-Johnson..... South Coast AQMD Staff
Sujata Jain South Coast AQMD Staff
Aaron Katzenstein South Coast AQMD Staff
Angela Kim South Coast AQMD Staff
Howard Lee South Coast AQMD Staff
Alicia Lizarraga South Coast AQMD Staff
Brisa Lopez South Coast AQMD Staff

Cristina Lopez South Coast AQMD Staff
Ron Moskowitz South Coast AQMD Staff
Susan Nakamura South Coast AQMD Staff
Wayne Nastri South Coast AQMD Staff
Robert Paud South Coast AQMD Staff
Genny Pearce South Coast AQMD Staff
Sarah Rees South Coast AQMD Staff
Aisha Reyes South Coast AQMD Staff
Lisa Tanaka O'Malley South Coast AQMD Staff
Charlene Wang South Coast AQMD Staff
Mei Wang South Coast AQMD Staff
Paul Wright South Coast AQMD Staff
Victor Yip South Coast AQMD Staff

ATTACHMENT 2A

KADESH & ASSOCIATES

South Coast AQMD Report for the August 2023
Legislative Meeting covering June-July 2023
Kadesh & Associates

President Biden signed the Fiscal Responsibility Act (FRA) into law on June 3, ending the months-long disagreement between his White House and the Republican-led House about the right approach to raising the debt ceiling. The final votes in the House and Senate came just days before the Treasury would no longer have had the ability to meet the nation's financial obligations. In the House, a majority of both parties supported the deal: Republicans voted 149-71, while Democrats voted 165-46. In the Senate, 17 Republicans joined the majority of Democrats for a vote of 63-36.

In addition to postponing the debt limit for two years (i.e. until after the November 2024 elections), the new law establishes new budget caps, alters certain NEPA requirements, reinstates payment requirements on federal student loans, modifies the work requirements of some safety net programs, and directs federal approvals for the Mountain Valley Pipeline. The bill also "claws back" tens of billions of dollars of unobligated/unspent funding from several COVID-era funding bills.

Establishing these budget caps gave the House and Senate appropriators the ability to begin working on fiscal 2024 spending bills. However, nothing in this session of Congress is easy: just days after the FRA vote, the House Freedom Caucus issued new demands of their GOP leadership, going as far as to derail regular business on the House floor. At Speaker McCarthy's direction, the House Appropriations Committee set a new topline funding level of \$1.47T, far below the FRA budget cap.

Using this lower funding level, the House Appropriations Committee has started to approve its bills along party-line votes. In the Interior-Environment bill, funding for clean air programs emerged relatively unscathed: the bill calls for \$69.9M for Targeted Airshed Grants, \$105 for DERA, and \$231M for CAA 103/105 programs. (For comparison, the final FY23 numbers were \$69.9M, \$100M, and \$249M, respectively.) However, the bill also prohibits EPA from approving a California waiver request under the Clean Air Act for the Small Off-Road Engine Regulations, cuts billions from the EPA including \$7.8 billion from the Greenhouse Gas Reduction Fund, and reduces funding for EJ programs as well. The bill report also directs EPA to take no regulatory action related to ethylene oxide until the FDA certifies that the new regulations will not impact medical device sterilization. Note, that the bill report is guidance and not legally enforceable.

The Interior bill is often contentious, but it is not clear as of this memo whether even the "low hanging fruit" bills, such as the Agriculture-FDA appropriations bill, will be considered on the floor before the August recess as planned. On one side, the Freedom Caucus is calling for more funding cuts; on the other, some Republican members (including appropriators) have joined Democrats in raising concerns about low funding levels as well as the culture war policy riders that are now included, especially regarding abortion.

KADESH & ASSOCIATES

In the Senate, the Appropriations committee has begun to approve its bills on a more bipartisan basis. The Interior-Environment bill has not yet been released; it will be marked up in late July. However, several infrastructure programs that can help with air quality have robust funding numbers in the Senate bill, including MARAD's Port Infrastructure Development Program (Senate: \$213M, House: \$69.7M) and FRA's Consolidated Rail Infrastructure and Safety Improvements program (Senate: \$572M, House: \$258M). Overall, the Senate's topline number is \$1.59T, meaning that the two chambers of Congress will have a lot of work to do to reach final FY24 funding and policy agreements, and not a lot of time to do so before the September 30 fiscal year deadline. The Senate is not likely to agree to issues like prohibition on California waiver for Small Off-Road Engine Regulations. The most likely outcome is a shutdown starting in October, a scenario that the Freedom Caucus has publicly welcomed.

Kadesh & Associates Activity Summary-

-Worked with South Coast AQMD and the congressional delegation on whole-of-government efforts to address air quality through BIL and IRA funding programs.

Contacts:

Contacts included staff and Members throughout the CA delegation, especially new members of the delegation, authors of priority legislation, Senate offices, and members of key committees. We have also been in touch with administration staff.

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ATTACHMENT 2B



Carmen Group
I N C O R P O R A T E D

To: South Coast AQMD Legislative Committee
From: Carmen Group
Date: July 27, 2023
Re: Federal Update -- Executive Branch

Congress Once Again on the Annual Spending Bills Brink: As Congress embarked on its summer recess, it left town with major questions unanswered about the how the Fiscal Year (FY) 24 appropriations process would be brought to a close, leaving little time in September to try to sort out seemingly intractable differences, not only between the Republican House and the Democratic Senate, but also within the House Republican caucus. A normal short-term Continuing Resolution (CR) to keep government running past September 30 at current spending levels will almost certainly be needed, but its passage in the House, normally routine, is far from certain, so a government shutdown is deemed possible.

Here is the current scorecard: In the House, 10 of the 12 appropriations bills have been approved through committee and one of these has passed through the full House. In the Senate, 12 of its 12 bills have been approved through committee, but none have passed through the full Senate. At the end of July, House Speaker McCarthy (R) and Senate Leader Schumer (D) met briefly and expressed their commitment and desire to pass all bills through their respective chambers by the end of September - - a tall order. Meanwhile, all of the Senate bills are being written to a higher overall spending cap than is being self-imposed in the House, where there are unresolved differences between the lower spending cap approved during the debt limit negotiations and the even lower cap -- -matching FY 22 levels -- being pushed by a group of some House Republicans.

Here are the proposed FY24 spending levels in committee-approved bills for key programs of special interest to South Coast AQMD. These are good, better than current year levels:

--FY24 House: TAG - \$69.9M; DERA - \$105M; SEC103/105 - \$231M
--FY24 Senate: TAG - \$69.9M; DERA - \$100M; SEC103/105 - \$249M

Separately, Senate EPW marked up S. 2195, a five-year DERA Reauthorization.

Department of Transportation

Funds Available for Mega and INFRA Grant Programs: In June, the Department of Transportation announced that applications are being solicited together under a single opportunity titled the Multimodal Project Discretionary Grant Program (MPDG). The

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solicitation includes \$1.8 billion available under the National Infrastructure Assistance (MEGA) program for large complex projects costing over \$100 million; \$3.1 billion under the Infrastructure for Rebuilding America (INFRA) program for multimodal projects of national and regional significance; and \$675 million for the Rural Surface Transportation Grant (Rural) program for major projects (over \$25 million) in rural areas. Applications due August 21, 2023.

Funds Available for “Reconnecting” and “Neighborhood Access” Grant Programs:

In July, the Department of Transportation announced that applications are being solicited under a single opportunity titled the Reconnecting Communities and Neighborhoods (RCN) Program. The solicitation includes \$198 million available under the Reconnecting Communities Pilot Program established in the Bipartisan Infrastructure Law and \$3.155 billion available under the Neighborhood Access and Equity Program established in the Inflation Reduction Act. These programs are both covered under the Administration’s Justice40 Initiative, which sets the goal that 40% of the overall benefits flow to disadvantaged communities. Applications due September 28, 2023.

RAISE Grant Awards Announced: In June, the Department of Transportation announced the award of more than \$2.2 billion from the RAISE (formerly TIGER) discretionary grant program for 162 projects across the country, including eight in California. Among the California grants were \$25 million for two intercity passenger rail stations in San Bernardino County, almost \$7 million for improvements along the Wilmington Avenue Corridor in Los Angeles; and over \$5 million for the design of transportation connections to the regional rail/bus center in Anaheim.

Bus Grant Awards Announced: In June, the Federal Transit Administration (FTA) announced a total of 130 bus-related grant awards across the country worth nearly \$1.7 billion that among other things will fund the purchase more than 1700 new buses, nearly half of which are zero-emission. The awards come from the agency’s two major bus discretionary grant programs: The Bus and Bus Facilities Program and the Low and No Emission (Low No) Vehicle Program.

Toolkit Gives Guidance to Urban Communities on EV Charging Infrastructure: In July, the Joint Office of Energy and Transportation released a free technical resource to help larger communities take full advantage of federal funding for electric vehicle charging stations and other forms of electric transportation. The new guide is called [Charging Forward: A Toolkit for Planning and Funding Urban Electric Mobility Infrastructure](#).

Airport Grants Targeted to Support Zero-Emission Goals: In July, the Federal Aviation Administration (FAA) announced that as part of nearly \$268 million in new Airport Improvement Program (AIP) grants, a total of about \$92 million will go to 21 airports across the country for solar panels, electric buses, charging stations and electrification infrastructure.

Trottenberg Named as Acting FAA Administrator: In June, the President designated DOT Deputy Secretary Polly Trottenberg to be Acting Administrator of the Federal Aviation Administration (FAA), effective immediately, while a search continues for a nominee who can be confirmed to fill a full five-year term in this important post.

Environmental Protection Agency

Greenhouse Gas Reduction Fund Grant Competitions: In July, the Environmental Protection Agency announced two grant competitions to begin the process to advance clean technology projects especially in low-income and disadvantaged communities. Under the agency's \$27 billion Greenhouse Gas Reduction Fund program established through the Inflation Reduction Act, two initial grant competitions are being launched to set up the mechanisms by which funding and financing will be ultimately distributed to thousands of projects in local communities. The \$14 billion National Clean Investment Fund grant competition will select two or three non-profit national clean financing institutions, enabling them to partner with the private sector to provide financing for clean technology projects nationwide. The \$6 billion Clean Communities Investment Accelerator grant competition will select two-to-seven hub non-profit organizations, enabling them to provide funding and technical assistance to community lenders working in low-income communities. Carmen Group attended the pre-application webinar providing information on the National Clean Investment Fund grant competition. While South Coast AQMD would not be eligible to apply, the program will affect communities in the South Coast AQMD region on clean technology issues of importance to the agency.

EPA Targets Methane Emissions from Oil and Gas Sector: In June and July, the EPA made several announcements about the Methane Emissions Reduction Program established by the Inflation Reduction Act. These announcements included a \$1 billion partnership between the EPA and the Department of Energy and its National Energy Technology Laboratory to address methane emissions; a proposal to amend reporting requirements for oil and gas systems under the Greenhouse Gas Reporting Program; and a notice of intent announcing the first in a series of funding opportunities to monitor and reduce methane emissions. Meanwhile on July 26, the Administration hosted the 2023 White House Methane Summit to announce the establishment of a new Cabinet-level Methane Task Force and other measures to address the problem on a government wide basis.

EPA Proposes Air Reporting Improvements: In July, the EPA announced proposed updates to the agency's Air Emissions Reporting Requirements Rule, including a proposal to require reporting of hazardous pollutants, or "air toxics." While the rule currently requires states to report emissions from common criteria pollutants and most states voluntarily report some air toxics, the data reported is not consistent nationwide. The agency is currently taking written comments on the proposed reporting requirement changes.

EPA Introduces Clean Air Tracking Tool: The EPA recently released the ECHO Clean Air Tracking Tool ([ECATT](#)), a repository of Clean Air Act data that can be used to evaluate emissions at stationary sources of air pollution and analyze general air quality.

EPA Launches Youth Advisory Council and Seeks Members: In June, the EPA announced the formation of the National Environmental Youth Advisory Council (NEYAC) to provide independent advice and recommendation to the EPA on a range of environmental issues as they relate to youth communities. EPA is soliciting applications

to fill 16 vacancies. Members will be appointed by the Administrator and must be between the ages of 16 and 29. Applications due August 22, 2023. [NEYAC Webpage](#)

Department of Energy

Energy Secretary Visits California; Cites Key Energy Facts: In June, Energy Secretary Jennifer Granholm visited California in the Los Angeles and Pendleton areas where her office cited several key energy facts of special interest, including:
--California has over 40,000 alternative fueling stations already, highest of any state
--California has the highest EV sales in the country, over 1.1 million EVs registered in CA

DOE Advances Clean Hydrogen Agenda: In June, the Department of Energy (DOE) released the [U.S. National Clean Hydrogen Strategy and Roadmap](#), a comprehensive framework for accelerating the production, processing, delivery, storage and use of clean hydrogen. In July, the Department released a Notice of Intent (NOI) which includes a Request for Information (RFI) to invest up to \$1 billion to support the Regional Clean Hydrogen Hubs (H2Hubs) program. [Notice of Intent](#)

Funds Available for Advancing Battery Recycling Technology: In June, the DOE announced two funding opportunities to advance battery recycling technology, which will be critical for the success of an expanding domestic electric vehicle market. These include DOE's \$125 million Consumer Electronics Recycling, Reprocessing and Battery Collection funding opportunity with applications due November 29, 2023; and DOE's \$60 million Advanced Battery R&D Consortium funding opportunity with applications due September 8, 2023.

DOE Says New Plan Will Ensure Public Access to the Department's Research: In June, the Department of Energy released a [Public Access Plan](#) to ensure the Department's federally-funded research is more open and accessible to the public, researchers, and journalists. The plan was developed with the participation and engagement of numerous communities including researchers, libraries, professional societies, publishers, Federal agency partners and the public. The plan anticipates that most requirements and guidance will be in place by the end of 2024 with implementation by the end of 2025.

Outreach: Contacts included staff at the Department of Defense Office of Naval Research (ONR) to arrange and coordinate additional meetings with South Coast AQMD on ocean-going-vessels emissions research; staff at the Senate Committee on Environment & Public Works regarding its July hearing on reducing rail industry emissions; and staff at the Environmental Protection Agency regarding its July webinar attended by Carmen Group on the Greenhouse Gas Reduction Fund/National Clean Investment Fund grant competition.

###

ATTACHMENT 2C



To: South Coast Air Quality Management District
From: Cassidy & Associates
Date: July 27, 2023
Re: June and July Report

HOUSE/SENATE

Congress

Appropriations and the National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2024 remained top priorities this month as Congress nears the August recess. So far this summer the Senate Appropriations Committee has concluded marking up their Energy and Water Development; State and Foreign Operations; Transportation, Housing, and Urban Development; Legislative Branch; Commerce, Justice, and Science; Financial Services; Military Construction and Veterans Affairs; and Agriculture appropriations bills. The Committee will finish [marking up](#) its version of the Defense; Interior and Environment; Labor, Health and Human Services, and Education; and Homeland Security appropriations bills on Thursday, July 27. Party leaders are hoping to conclude floor action on [NDAA](#) by the end of the week, despite several outstanding amendments and the absence of Senate Majority Whip Dick Durbin (D-IL) who has COVID-19.

The House Appropriations Committee has approved many of their spending bills as well, including Interior and Environment; Transportation, Housing, and Urban Development; Financial Services; State and Foreign Operations; Energy and Water Development; Defense; Legislative Branch; Homeland Security; Agriculture; and Military Construction and Veterans Affairs. The House's Interior and Environment spending bill would include a \$3.962 billion, or 39% reduction to the EPA budget. The House additionally passed [its version](#) of the NDAA in June.

Other agenda items for Congress include the 2023 Farm Bill and the reauthorization of the Federal Aviation Administration (FAA). There has been little progress on the Farm bill thus far.

The Senate version of the FAA Reauthorization bill is awaiting markup; the House passed their version of the legislation on July 20.

Congress will be in recess beginning on July 29. The Senate is scheduled to return on September 5, and the House is scheduled to return on September 12.

EPA

In late May, the EPA released the ECHO Clean Air Tracking Tool (ECATT), which compiles Clean Air Act Data and can be used to evaluate emissions at stationary sources of air pollution and analyze general air quality. The two main searches available are the Air Monitoring Station search and the Emissions Screener search. You can access the tool [here](#).

The EPA continues to encourage parties to apply for the Clean School Bus Program, which funds zero emission buses. The EPA plans to award around \$400 million in grants nationally. On June 14, Rep. Brittany Pettersen (D-CO) and Rep. Joe Neguse (D-CO) participated in a webinar on the program along with EPA staff.

On June 21, the EPA issued a [final rule](#) under the Renewable Fuel Standard (RFS) program. The rule establishes biofuel volume requirements for 2023 to 2025 and intends to reduce reliance on foreign oil sources and monitor the implementation of the RFS program, which aims to reduce greenhouse gas emissions.

The EPA and Department of Energy [announced](#) a new partnership on June 30. The project, dubbed the [Methane Emissions Reduction Program](#), will provide \$1 billion in funding to reduce methane emissions from the oil and gas sector. The EPA will oversee the regulatory aspects of the program whilst DOE will assist in the financial and technical aspects. The program will provide funding for the creation of greenhouse gas reports, methane emissions monitoring, improvement of equipment to reduce emissions, innovation, mitigating legacy air pollution, and more.

On July 6, the EPA issued a proposal to amend reporting requirements for petroleum and natural gas systems under the Greenhouse Gas Reporting Program. The amendment aims to improve the accuracy of emissions data on methane, consistent with the Methane Emissions Reduction Program under the Inflation Reduction Act changes to the Clean Air Act.

On July 11, the EPA issued a final rule to implement a 40% reduction in hydrofluorocarbons (HFCs) below historic levels from 2024 through 2028. HFCs, which are a common greenhouse gas, have already been the subject of phasedown efforts from the Biden administration.

On July 25, the EPA announced a proposed update to their Air Emissions Reporting Requirements [rule](#). The updates would require states and facilities to report hazardous air pollutants known as air toxics which can cause serious health issues. The requirement would

enable the EPA to better examine data and identify locations in which people are exposed to harmful pollutants.

Cassidy and Associates support in June and July:

- Secured key meetings with the Biden Administration for Executive staff
- Worked with South Coast AQMD staff to strategize on DC outreach
- Provided an overview of EPA Clean Ports funding program
- Advised staff on House and Senate Appropriations markups, focusing on South Coast AQMD priorities
- Continued to monitor and report on activities in Congress and the Administration that impact the District

IMPORTANT LEGISLATIVE DATES

September 30, 2023:

FY 2023 appropriations expire.

September 30, 2023:

The Farm Bill, an omnibus package of legislation that supports US agriculture and food industries expires; the bill is reauthorized on a five-year cycle.

September 30, 2023:

Deadline for the Federal Aviation Administration reauthorization.

September 30, 2023:

National Flood Insurance Program reauthorization deadline.

AGENCY RESOURCES

USA.gov is cataloging all U.S. government activities related to coronavirus. From actions on health and safety to travel, immigration, and transportation to education, find pertinent actions [here](#). Each Federal Agency has also established a dedicated coronavirus website, where you can find important information and guidance. They include: Health and Human Services ([HHS](#)), Centers of Medicare and Medicaid ([CMS](#)), Food and Drug Administration ([FDA](#)), Department of Education ([DoED](#)), Department of Agriculture ([USDA](#)), Small Business Administration ([SBA](#)), Department of Labor ([DOL](#)), Department of Homeland Security ([DHS](#)), Department of State ([DOS](#)), Department of Veterans Affairs ([VA](#)), Environmental Protection Agency ([EPA](#)), Department of the Interior ([DOI](#)), Department of Energy ([DOE](#)), Department of Commerce ([DOC](#)), Department of Justice ([DOJ](#)), Department of Housing and Urban Development ([HUD](#)), Department of the Treasury ([USDT](#)), Office of the Director of National Intelligence ([ODNI](#)), and U.S. Election Assistance Commission ([EAC](#)).

Helpful Agency Contact Information:

U.S. Department of Health and Human Services – Darcie Johnston (Office – 202-853-0582 / Cell – 202-690-1058 / Email – darcie.johnston@hhs.gov)

U.S. Department of Homeland Security – Cherie Short (Office – 202-441-3103 / Cell – 202-893-2941 / Email – Cherie.short@hq.dhs.gov)

U.S. Department of State – Bill Killion (Office – 202-647-7595 / Cell – 202-294-2605 / Email – killionw@state.gov)

U.S. Department of Transportation – Sean Poole (Office – 202-597-5109 / Cell – 202-366-3132 / Email – sean.poole@dot.gov)

ATTACHMENT 3A



Joe A. Gonsalves & Son

Anthony D. Gonsalves

Jason A. Gonsalves

Paul A. Gonsalves

PROFESSIONAL LEGISLATIVE REPRESENTATION

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Email: gonsalves@gonsalvi.com

TO: South Coast Air Quality Management District
FROM: Anthony, Jason & Paul Gonsalves
SUBJECT: Legislative Update – June & July 2023
DATE: Thursday, July 27, 2023

During the months of June and July, the Legislature’s focus was on reaching an agreement on the state budget. In January, the Governor’s proposed budget identified a \$22.5 billion budget deficit that ballooned to \$31.5 billion in his May Revise. Although the Legislature and Governor were unable to reach an agreement by the June 15th Constitutional deadline, the Legislature passed a 2-house budget to meet the deadline and ultimately reached an agreement with the Governor by the end of June on a final budget package.

The Legislature adjourned for its summer recess on July 14. They will not return to Sacramento until August 14, at which point they will have just over four weeks to complete their work and adjourn this year’s session.

The final month of session is typically a hectic time as legislators, staff, and lobbyists scramble to move or kill bills in the final weeks of session. We also expect wrangling to continue over the content of various general obligation bonds the Governor and the Legislature are currently considering.

The following will provide you with updates of interest to South Coast AQMD:

Bonds

The climate and flood bonds that have been moving through the state Legislature include SB 867 (Allen), SB 638 (Eggman), AB 1567 (Garcia), and AB 305 (Villapudua). While all of these bonds passed out of the house they were introduced in, none were set for hearing in the “second house” policy committees they were referred to. The Senate declined to set the Assembly bonds and the Assembly followed suit.

The Legislature and the Governor are grappling with a number of competing bond proposals. Other bonds on the table include a \$14 billion school bond, a \$10 billion affordable housing bond, and a \$5.2 billion fentanyl bond. In addition to all of these proposals, the Governor’s immediate priority is a \$4.7 billion bond for behavioral health.

The Legislature and the Governor must grapple with a few issues. First, voters have limited appetite for taking on more debt. Exactly how much appetite they have is discerned through a combination of polling and guesswork. Separate from the total amount of debt, there is the fatigue of voters from being asked to weigh in on too many bonds on the same ballot.

The latter issue appears to be a factor for the climate bonds. While proponents of both SB 867 and AB 1567 are pushing for their inclusion on the March ballot, the Governor is also seeking to place his behavioral health bond on that ballot. Pushing the climate bonds to the November election is always an option, but the Legislature and the Governor will still have to agree on how to prioritize their asks of voters in both elections.

New Speaker and Leadership Changes:

On July 1, 2023, Assemblymember Robert Rivas became the new Assembly Speaker, replacing Speaker Anthony Rendon. The new Speaker has made few changes during this transition so that the legislative process is not interrupted in the last few months of session. That said, Assembly Speaker Rivas announced that Assemblywoman Cecilia Aguiar-Curry is the new Speaker Pro Tem, the second most powerful role in the Assembly. Assemblymember Aguiar-Curry was Chair of the Assembly Local Government Committee and was replaced with Assemblyman Juan Carrillo as the new Chair. Additionally, Speaker Rivas announced that Assemblyman Isaac Bryan is the new Majority Leader for the 62-member Democratic caucus. Assemblymember Bryan was the Chair of the Assembly Elections Committee and Assemblywoman Gail Pellerin replaced him as the new Chair.

We expect numerous changes to occur once this legislative session is over and we will be sure to keep you apprised of those changes.

Budget:

On June 15th, the Assembly and Senate passed SB 101, the main budget bill. The details of this budget agreement really didn't matter because passing the Budget Bill was just a drill to meet the June 15 deadline so the Legislature could continue to receive their paycheck. Legislative leaders, Speaker Rendon and Pro Tem Atkins, described it as a two-party agreement and continued to negotiate with the Governor to make progress on a three-party final budget agreement.

Just a few weeks later, Governor Newsom and Legislative Leaders reached a 3-party agreement on a final budget. The agreement reflects weeks of negotiations over the Governor's major infrastructure package.

This year's budget is \$310.8 billion that covers the \$32 billion deficit without tapping into the State's \$37.8 billion in reserves. The budget includes:

- \$5.1 billion for transit
- A \$2.9 billion cut to climate change programs that were previously a multiyear commitment.

- \$1 billion into round 5 of the state's Homeless Housing, Assistance and Prevention program
- \$330 million film tax credit

The Legislative Analyst Office (LAO) declared that revenues would fall short of projected numbers and raised the projected deficit by several billion dollars. Additionally, the LAO projected that continuing the spending proposed in Governor Newsom's budget to the following year would cost \$30 billion more for the two-year period along with projected annual deficits averaging \$18 billion over the next three years.

Governor's Infrastructure Package

As previously mentioned, one of the main sticking points for this year's budget was the Governor's proposed Infrastructure Package. The Governor released 11 bills comprising his Infrastructure Package that includes CEQA reform and permit streamlining legislation. The bills condense CEQA litigation timelines, reform the process of developing an administrative record for CEQA litigation and provide for other permitting-related process reforms.

The Legislature had serious reservations regarding the Governor's Infrastructure Package, mainly around the process. Many legislators were frustrated that the proposal was being done in the budget rather than through the legislative policy process. Nonetheless, the Legislature was able to reach an agreement with the Administration on a paired down version of the Infrastructure Package.

Zero Emission Trucks

On June 28, 2023, Governor Gavin Newsom along with California Attorney General Rob Bonta, and the California Air Resources Board (CARB) led a multistate coalition in moving to intervene in lawsuits challenging the decision by the U.S. Environmental Protection Agency (EPA) to authorize CARB regulations that would speed the adoption of zero-emission trucks. The regulations would help California tackle its significant climate and air quality challenges by reducing greenhouse gases, nitrogen oxides, particulate matter, and other emissions from medium- and heavy-duty vehicles. Trucking and petroleum industry groups (but not vehicle or engine manufacturers) are among the petitioners seeking judicial review of EPA's action to grant CARB's request for waivers of preemption, which allowed these CARB regulations to move forward. California, along with a coalition of other states and cities, is moving to intervene to defend its ability to enforce its laws.

The truck emission regulations at issue include the following:

Advanced Clean Trucks regulation, which aims to accelerate the widespread adoption of zero-emission vehicles in the medium- and heavy-duty truck sector by requiring manufacturers of medium- and heavy-duty trucks to sell increasing numbers of zero-emission vehicles.

Zero Emission Airport Shuttle regulation, which would accelerate the adoption of zero-emission vehicle technology in airport shuttles at the 13 largest California airports, including Los Angeles

International Airport (LAX), San Francisco International Airport (SFO), San Diego International Airport (SAN), and Sacramento International Airport (SAC).

Heavy-Duty Emissions Warranty regulation, which, among other things, would lengthen the period during which manufacturers must guarantee the emissions performance of their on-road diesel engines.

Under the federal Clean Air Act, California may request a waiver of preemption from EPA to enforce emission standards for new motor vehicles. EPA must grant a waiver request unless the record supports one of three limited findings for denial. Most other states have a choice of adopting California's standards to apply in their jurisdictions or relying instead on federal standards.

Joining California in filing the motion to intervene are the States of Colorado, Connecticut, Delaware, Hawaii, Illinois, Maine, Maryland, Minnesota, New Jersey, New York, North Carolina, Oregon, Rhode Island, Vermont, and Washington, the Commonwealths of Massachusetts and Pennsylvania, the District of Columbia, and the Cities of Los Angeles and New York.

Agreement on Zero-Emission Transition

On July 6, 2023, California announced a partnership with the nation's top truck manufacturers that advances the development of zero-emission vehicles (ZEVs) for the commercial trucking industry, putting the state on track to meet our climate goals and protecting the health of front line communities impacted most by trucking pollution.

The agreement reached between CARB and the Truck and Engine Manufacturers Association and its commercial engine and vehicle members and Ford Motor Company includes a commitment from the companies to meet California's ZEV standards of 100% clean truck sales by 2036. The agreement also includes stipulations regarding emissions standards, regulatory changes, and more.

As previously reported, last April California became the first jurisdiction in the world to end the sales of traditional combustion trucks by 2036, creating a path to 100% zero emission medium heavy-duty trucks on the roads in California by 2045. This adds to California's Advanced Clean Trucks rule, which requires manufacturers to accelerate sales of new zero emissions heavy-duty trucks by 2035. The two regulations work in tandem to drastically cut air pollution, especially in disadvantaged communities.

2023 LEGISLATIVE DEADLINES

June 2 - Last day for each house to pass bills introduced in that house

June 5 - Committee meetings may resume

June 15 - Budget Bill must be passed by midnight

July 14 - Last day for policy committees to meet and report bills. Summer Recess begins upon adjournment, provided Budget Bill has been passed

August 14 - Legislature reconvenes from Summer Recess

September 1 - Last day for fiscal committees to meet and report bills

September 5-14 - Floor session only. No committees may meet for any purpose, except Rules Committee, bills referred pursuant to Assembly Rule 77.2, and Conference Committees

September 8 - Last day to amend on the Floor

September 14 - Last day for each house to pass bills. Interim Recess begins upon adjournment

South Coast Air Quality Management District Legislative and Regulatory Update – June and July 2023

❖ Important Upcoming Dates

August 14 – Legislature Reconvenes from Summer Recess
September 1 – Last Day for Fiscal Committees To Meet and Report Bills

❖ RESOLUTE Actions on Behalf of South Coast AQMD. RESOLUTE partners David Quintana and Alfredo Arredondo continued their representation of South Coast AQMD before the State's Legislative and Executive branches. Selected highlights of our recent advocacy include:

- Provided key updates regarding the transition of leadership in the Assembly.
- Set and attended meetings with legislative offices in support of sponsored legislation.

❖ Politico: Democrats push back on Newsom's proposed cuts to transit and climate change. By Lara Korte | 06/12/2023 01:50 AM EDT

SACRAMENTO, Calif. — Legislative Democrats are looking to restore some of the cuts proposed by Gov. Gavin Newsom to next year's budget, laying out a plan to fund certain transit, climate change and health insurance programs in a massive budget bill released Sunday night.

Key context: Senate Bill 101 and Assembly Bill 101 will act as the primary budget bills for the 2024 fiscal year, but a complete spending plan is still weeks away. The legislation released Sunday night represents a joint agreement between the two houses — not necessarily Newsom. Lawmakers are constitutionally required to pass a bill by June 15 or risk losing pay, but the final details will be negotiated after that date with the governor's office and passed into law in the following weeks through dozens of trailer bills.

Newsom and the Legislature are under pressure to make up an estimated \$31.5 billion deficit this year, but have differed on some key points.

Transit: Newsom in May had proposed cutting \$2.2 billion from public transit operators. But Legislative Democrats say a cut in state funding could be dire with regional agencies like BART suffering from low ridership after the pandemic. The budget bill maintains that funding to the Transit and Intercity Rail Capital and Active Transportation programs, which lawmakers say was a core part of an agreement with the administration last year to fund high-speed rail.

Climate change: Part of the governor's plan included cutting or delaying funding for the some of the state's climate, resources and energy projects. Legislators want to pull back on those cuts and make up the difference in other places. They're proposing spending more than \$1 billion on programs for recycled water, parks, urban greening, coastal climate change protections, extreme heat and community resilience, PFAS cleanup, dam safety and Salton Sea restoration. Instead, the Legislature wants to cut \$937 million from the strategic energy reserve, which was created last year to help sustain the electrical grid.

❖ CalMatters: How will Robert Rivas lead the CA Assembly?.

The key to understanding new Assembly Speaker Robert Rivas' leadership might be his severe childhood stutter.

Growing up, he often had his ears open more than his mouth. Now, Rivas said Wednesday in an interview hosted by the Sacramento Press Club, his greatest strength is hearing people out and engaging with the concerns of his colleagues.

“When sometimes you can’t say things, you have no choice but to listen,” the [Salinas Democrat](#) said. That was the pitch Rivas said he made last year to his fellow Assembly Democrats as he waged a [protracted, and highly political, battle](#) with [former Speaker Anthony Rendon](#) for control of the lower house of the California Legislature. He would be a convener, inclusive, unifying the caucus’ agenda.

During the interview Wednesday, his first major public event since he was [sworn in as speaker less than two weeks ago](#), Rivas still seemed to be figuring out what exactly that would entail. Repeatedly emphasizing that it was only his 12th day on the job, Rivas offered few specifics about what might be a priority as the Legislature enters its final month of session, or where he would want to direct the oversight efforts that he suggested during his inaugural speech should be a greater focus for lawmakers.

Rivas did acknowledge that he wants the Assembly to pass Senate Bill 423, a [contentious measure to fast-track permits](#) for new apartment buildings in much of the state, which only narrowly advanced out of committee earlier this week when several Democratic and Republican members [teamed up to override the chairperson](#).

“With housing, we continue to just chip around the corners on this problem,” Rivas said. “But people expect us to make progress, and much more progress.”

In a rapid-fire round, he also expressed his support for [legalizing psychedelic drugs](#) in California and raising the minimum wage for [health care workers to \\$25 per hour](#). His favorite Mexican food in Sacramento, he said, is a home-cooked meal from Assemblymember [Sharon Quirk-Silva](#), a Fullerton Democrat.

Rivas tried to draw a sharp professional boundary with his brother, Rick Rivas, who has been his closest political adviser throughout his career and works as a consultant for the American Beverage Association, a soda industry group.

“My brother is not a lobbyist. He’s never lobbied me,” the speaker said. “I will always serve the residents of this state to the best of my ability and always maintain those lines of ethics, of doing things the right way.”

Though they have a tight bond — forged by sharing a bed as children — Robert Rivas said there would be no undue influence from his brother’s clients on his agenda. Rick Rivas also advises Govern For California, a donor network that aims to counteract the influence of unions at the state Capitol and that [pushed the boundaries of state campaign finance law](#) as it boosted Robert Rivas’ speakership bid.

“How I won the speakership was through engagement and through the relationships I have built up and down this state,” he said, dismissing the notion that he bought the role. “I take that responsibility very seriously. I certainly appreciate all of the political advice my brother has ever given me. But he has a job to do and so do I.”

❖ **Politico: Gavin Newsom poised to play \$26 billion gatekeeper for California Democrats**
By Jeremy B. White | 07/21/2023 06:16 PM EDT

SACRAMENTO, Calif. — California is on the cusp of a borrowing bonanza as Democratic lawmakers line up tens of billions of dollars in bond proposals to pay for mental health treatment, schools and adapting to climate change.

But voters would need to sign off on the new debt. And everyone is looking to Gov. Gavin Newsom to settle how much to ask for and where to spend it — acknowledging that asking an economically anxious electorate for too much could mean inundating voters in 2024 and ending up empty-handed.

“A number of legislative leaders have come to me — ‘Hey, support this, support my bond, this bond,’” Newsom said at a recent press conference. “We have to work together on what the priorities are going to look like for November.”

The governor and others are weighing a complex set of political calculations as proposals advance in the Legislature, including whether to target the March primary ballot, when turnout will be lower and skew more conservative, or a crowded November ballot where a cluster of initiatives will compete for voters’ attention.

Then there are the practical constraints: The state generally avoids taking on excessive debt as a matter of fiscal caution and Wall Street financing’s capacity, with Newsom estimating the prudent limit at around \$26 billion.

Democrats’ bond bills — added together — would tally more than \$100 billion, though some overlap and would almost certainly be combined.

Newsom would have to sign off on any bond measure the Legislature approves with a two-thirds vote. He has signaled he’d like his proposal — to fund thousands of new mental health and substance use treatment slots — to sit alone on the March ballot, which would push other bonds to a November election teeming with high-stakes initiatives. Lawmakers have until October to place something before primary voters.

Here are the major proposals and players:

Behavioral health treatment

This is Newsom’s baby. The governor wants to ameliorate homelessness by channeling money into treatment for substance abuse and serious mental health disorders with a \$4.68 billion bond that would fund up to 10,000 placements and housing for veterans. A companion policy bill changes how an existing, voter-passed mental health initiative allocates money.

Lawmakers have rallied behind the governor’s proposal, along with the California Professional Firefighters, who respond to addiction and mental health crises. Both measures are exceedingly likely to pass — and Newsom has emphasized he wants to focus on this before moving on to the other bond proposals.

Climate change

Flood prevention, water supplies, clean energy generation: There’s no shortage of ideas to help California adapt to a changing climate. Newsom backed a bond measure this year to offset his deficit-driven cuts to environmental programs.

Assemblymember Eduardo Garcia and state Sen. Ben Allen, Southern California Democrats, have proposed measures worth more than \$15 billion. The parallel bills are parked in committee, at leadership’s request, as the players negotiate. There are also multiple flood-focused bond bills.

The Nature Conservancy has been heavily involved in negotiations, conducting polling on the ideal size and timing, along with an array of environmental and local government groups. Water politics will influence the outcome, with the Association of California Water Agencies and its members pushing for funding.

Education

Voters in 2020 decisively rejected the last statewide school construction bond despite Newsom backing the measure. Supporters say the need for school facility improvements has only increased since then, with the state estimating last year that needed upgrades would cost more than \$7 billion.

But the bond's failure has informed current negotiations as players look to avoid another rejection. One point of contention: whether to fund university facility projects. A \$15 billion bond from state Sen. Steve Glazer would cover four-year colleges, while a \$14 billion proposal from Assemblymember Al Muratsuchi would fund only K-12 schools and community colleges.

Glazer's proposal has support from the University of California and California State University. Muratsuchi's has marshaled a larger coalition that includes administrators, school boards, construction groups like the California Building Industry Association and the Coalition for Adequate School Housing, a group that spent heavily for the 2020 measure.

Housing

California faces a massive housing shortfall. Assembly Housing Chair Buffy Wicks, an Oakland Democrat, wants to make a dent with a \$10 billion bond, much of which would flow to the state's Multifamily Housing Program to construct and renovate housing for low-income Californians. State Sen. Anthony Portantino is pursuing a separate mortgage and construction bond that, at its current \$25 billion, would swallow up the entire bond budget.

Wicks has some powerful allies in supporters like the California Apartment Association, which represents landlords, and the California Housing Consortium. The State Building and Construction Trades Council union group supports Portantino's measure.

Wicks acknowledged in an interview that there are limits to what voters would accept and said she's working with Newsom on a coordinated housing response. The governor has called a potential housing measure "a big part" of negotiations.

"What I want to avoid is housing fatigue on the ballot," Wicks said. "I don't want five housing bonds on the ballot and voters go 'uhhh, I don't know.'"

ATTACHMENT 3C



CALIFORNIA ADVISORS, LLC

South Coast AQMD Report
California Advisors, LLC
August 11, 2023, Legislative Committee Hearing

Legislative Update

July 14th marked the last day for policy committees to meet and report bills before the start of the summer recess, which concludes on August 14th. During this time, lawmakers will return to their districts or take a much-deserved vacation. While legislators are away, consultants, legislative staff and legislative advocates will continue efforts to finalize legislation before legislators return to Sacramento for the final month of session.

Upon return, attention will turn to the appropriations committees, which will decide the fate of hundreds of fiscal bills placed on the “suspense” file. The fiscal committees have until September 1st to report bills to the floor; those that pass will go before the Senate and Assembly for a full vote before their respective houses. The final day to amend bills on the floor is on September 8th before the end of Session on September 14th. Bills that do not pass will become two-year bills, subjected to an expedited schedule in January when Session resumes in 2024.

On June 30th, the Assembly held a ceremony to formally transition the leadership to Speaker Robert Rivas. Outgoing Speaker-emeritus Anthony Rendon spent more than six years in the post. He was the third longest serving Speaker in history, behind Jesse Unruh and Willie Brown. Speaker Rivas formally announced two new members of his leadership team, Speaker Pro Tem Cecilia Aguiar-Curry (Winters) and Majority Leader Isaac Bryan (Los Angeles). There are several changes expected in the fall to policy committees once this legislative session is complete.

Budget Update

The Legislature and the Governor spent much of June negotiating a state budget. While the Legislature ultimately passed a \$311.7 billion budget deal by the required June 15th deadline, additional time was necessary to pass follow up budget bills, which reflected weeks of negotiations between the Legislature and the Governor. Governor Newsom signed the budget on June 27th followed quickly by a package of five infrastructure bills. Despite large budget deficits, the budget included mechanisms, such as delaying or reducing funding, that covered a \$30 billion-plus shortfall without dipping into reserves.

The infrastructure package generally centers on streamlining permitting processes, speeding up judicial review to prevent undue delays from legal challenges, and addressing elements of the California Environmental Quality Act. It represents a push by Governor Newsom and the

Legislature to take advantage of over \$180 billion in state, local and federal infrastructure funds over the next ten years to achieve California's energy and climate goals. The bills include urgency clauses and take effect immediately.

Critically, the funding for AB 617 remained at \$300 million. After months of advocacy and various proposals the final budget reflected the state's ongoing commitment to the program and included additional money for air districts to implement this program. Like years past, they used a mix of Greenhouse Gas Reduction Fund and General Fund dollars to fund this program.

On July 6th, Governor Newsom announced \$1.5 billion in Port Infrastructure Upgrades. This money included \$450 million to support zero-emission projects at the ports. There was also \$350 million awarded to 13 projects that eliminated street-level rail crossings to make safety improvements and reduce emissions. South Coast Air Quality Management District was awarded \$76,250,003 from the Port and Freight Infrastructure Program (PFIP) for the Freight Air Quality Solutions (FAQS) project.

BOARD MEETING DATE: September 1, 2023

AGENDA NO. 28

REPORT: Mobile Source Committee

SYNOPSIS: The Mobile Source Committee held on Friday, August 18, 2023.
The following is a summary of the meeting.

RECOMMENDED ACTION:
Receive and file.

Gideon Kracov, Chair
Mobile Source Committee

SLR:ja

Committee Members

Present: Board Member Gideon Kracov, Committee Chair
Mayor Larry McCallon
Supervisor Holly J. Mitchell
Council Member Nithya Raman
Council Member Carlos Rodriguez

Absent: Supervisor V. Manuel Perez

Call to Order

Committee Chair Kracov called the meeting to order at 9:00 a.m.

For additional details, please refer to the [Webcast](#).

ROLL CALL

INFORMATIONAL ITEM S (Items 1-2):

1. Update on Rail Yard Facility Based Mobile Source Measures

Chair Kracov discussed various considerations in exploring a memorandum of understanding (MOU) with Union Pacific (UP) and Burlington Northern Santa Fe

(BNSF) railroads to reduce rail emissions. Mr. Ian MacMillan, Assistant Deputy Executive Officer, Planning, Rule Development, and Implementation, followed with an update on implementing Rail Yard Facility Based Mobile Source Measures via a potential MOU. For additional details, please refer to [Webcast](#) at 00:11.

Supervisor Mitchell and Councilmember Raman requested clarification on the differences in the public process between the MOU and Regulatory approach. Mr. MacMillan responded that the processes are similar; however, an MOU may offer some flexibility in potentially incorporating public input that cannot be addressed by air pollution regulation. For additional details, please refer to [Webcast](#) at 00:32.

The following is a list of people that provided comments on the MOU approach:

- Alison Hahm, Natural Resources Defense Council
- David Pettit, Natural Resources Defense Council
- Pancho Nopales
- Lizbeth Sombrano
- Honey Bizarro
- Andrea Luna
- Chris Chavez, Coalition for Clean Air
- Jesse Marquez, Coalition For A Safe Environment
- Taylor Thomas, East Yard Communities for Environmental Justice
- Laura Cortez, East Yard Communities for Environmental Justice
- Raul Leon, East Yard Communities for Environmental Justice
- Tiff Sanchez, East Yard Communities for Environmental Justice
- Jan Victor Andasan, East Yard Communities for Environmental Justice
- Mark Lopez, East Yard Communities for Environmental Justice
- Yasmine Agelidis Earthjustice
- Fernando Gaytan, Earthjustice
- Theral Golden, West Long Beach Association
- Darby Osnaya, Sierra Club

The commentors above provided the following comments:

- Expressed concerns over an MOU approach;
- Urged South Coast AQMD to continue indirect source rulemaking (ISR) for rail yards;
- Asked for full transparency of the MOU process, status confirmation of the proposed new rail yards; and
- Any MOU needs to:
 - Demonstrate more emission reductions achievable than ISRs;
 - Be enforceable by third parties including citizens; and
 - Incorporate measurable targets, independent outcome verification, and reparation of historical harms.

Mr. Pettit cautioned staff not to reconsider the MOU approach for marine ports and emphasized the need for California Environmental Quality Act compliance. For additional details, please refer to [Webcast](#) at 00:39.

Heather Tomley, Port of Long Beach, expressed support for an MOU approach. For additional details, please refer to [Webcast](#) at 1:05. Thomas Jelenić, Pacific Merchant Shipping Association, inquired how the proposed Ports ISR would account for rail emissions covered in an MOU. For additional details, please refer to [Webcast](#) at 1:12.

Bethmarie Quiambao, Southern California Edison, offered to provide input on MOU components related to electrical infrastructure. For additional details, please refer to [Webcast](#) at 1:13. Lupe Valdez, UP, and Allen Doyel, BNSF, acknowledged community concerns and expressed willingness to work with communities to find solutions via the proposed MOU. For additional details please refer to [Webcast](#) 1:16.

Councilmember Raman inquired on any differences in enforceability between a MOU and rule. Barbara Baird, Chief Deputy Counsel, responded that enforceability is similar and added that both can be submitted into the State Implementation Plan, which, if approved by U.S. EPA, will become enforceable by citizens.

Councilmember Raman then inquired whether staff regularly communicates with CARB and whether resources constraint prohibits staff from pursuing an MOU and ISRs simultaneously. Mr. Wayne Natri, Executive Officer, responded yes to both. Councilmember Raman, Supervisor Mitchell, and Councilmember Rodriguez inquired on emission reductions comparison between the MOU and a regulatory approach, and they requested that estimates be provided in a future meeting. For additional details, please refer to [Webcast](#) 1:25.

Mayor McCallon expressed support for an enforceable MOU citing concerns of delayed emission reductions due to litigation risk with a rule. Councilmember Raman requested to be briefed on past court cases involving railroads. For additional details, please refer to [Webcast](#) 1:37.

Supervisor Mitchell asked if past public input on rulemaking will be considered for the proposed MOU and inquired on any subsequent action if no agreement is reached with the railroads on an MOU. Mr. Natri responded affirmatively to the former and added that staff will seek the Board direction if there is no agreement by December 2023. For additional details, please refer to [Webcast](#) 1:40.

Chair Kracov stated that any MOU must not undermine CARB's in-use locomotive rule or include unacceptable "poison pills" that unduly circumscribe South Coast AQMD's enforcement authority. Mr. Natri and Mayor McCallon added respectively that enforceability and community health benefits are the highest

priorities for MOU development. For additional details, please refer to [Webcast 1:53](#).

2. Update on the Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program

This item was postponed to the September 15, 2023 Mobile Source Committee Meeting

WRITTEN REPORTS (Items 3-6):

3. Recommendations on Proposed Membership Roster for the AQMP Advisory Group

This item is to appoint members to the AQMP Advisory Group for a new four-year term. Dr. Rees recommended the addition of Curtis Coleman and Rita Loof to the proposed membership roster. Additionally, the primary member and alternate for Los Angeles Area Chamber of Commerce were switched upon request.

Arnold Sax, public member, expressed confusion regarding different agendas and titles.

Harvey Eder, Public Solar Power Coalition, commented on the selection of base year, exceptional events and CARB's Climate Scoping Plan.

Board Member McCallon brought it to a motion, which Board Member Mitchell seconded. The motion was approved 5-0 with Board Member Perez absent. For additional details, please refer to the [Webcast](#) beginning at 1:58:45.

4. Recommendations on Proposed Membership Roster for the Scientific, Technical, and Modeling Peer Review Advisory Group

This item is to appoint members to the Scientific, Technical, and Modeling Peer Review Advisory Group for a four-year term.

Mr. Sax expressed confusion regarding different agendas and titles.

Mr. Eder commented on the inclusion of solar power strategies in the 2022 AQMP.

Board Member McCallon brought it to a motion, which Board Member Mitchell seconded. The motion was approved 5-0 with Board Member Perez absent. For additional details, please refer to the [Webcast](#) beginning at 2:03:45.

5. Rule 2202 Activity Report: Rule 2202 Summary Status Report

This item was received and filed.

6. Intergovernmental Review of Environmental Documents and CEQA Lead Agency Projects

This item was received and filed.

OTHER MATTERS:

7. Other Business

There was no other business to report.

8. Public Comment Period

Ms. Thomas, East Yard Communities for Environmental Justice , encouraged the committee to focus on human rights and spoke against the Southern California International Gateway. Mr. Sax requested future discussions on the Alameda Corridor Construction Authority, high speed rail versus freight rail considerations and brought attention to the steep grades in Colton. Mr. Eder expressed support for Solar Trucks and would like solar to be considered for use with the railroads.

9. Next Meeting Date

The next regular Mobile Source Committee meeting is scheduled for Friday, September 15, 2023 at 9:00 a.m.

Adjournment

The meeting adjourned at 11:11 a.m.

Attachments

1. Attendance Record
2. Recommendations on Proposed Membership Roster for the AQMP Advisory Group – Written Report
3. Recommendations on Proposed Membership Roster for the Scientific, Technical, and Modeling Peer Review Advisory Group – Written Report

4. Rule 2202 Activity Report – Written Report

5. Intergovernmental Review of Environmental Documents and CEQA Lead Agency Projects – Written Report

ATTACHMENT 1

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
MOBILE SOURCE COMMITTEE MEETING
Attendance – August 18, 2023**

Board Member Gideon Kracov.....	South Coast AQMD Board Member
Councilmember Larry McCallon.....	South Coast AQMD Board Member
Supervisor Holly J. Mitchell.....	South Coast AQMD Board Member
Councilmember Nithya Raman.....	South Coast AQMD Board Member
Mayor Carlos Rodriguez.....	South Coast AQMD Board Member
Guillermo Gonzales	Board Consultant (Perez)
Jackson Guze	Board Consultant (Raman)
Lorraine Lundquist	Board Consultant (Mitchell)
Debra Mendelsohn.....	Board Consultant (McCallon)
Uduak-Joe Ntuk.....	Board Consultant (Kracov)
Mark Taylor	Board Consultant (Rodriguez)
Andrew Silva	Board Consultant (Lock Dawson)
Yasmine Agelidis.....	Earthjustice
Jan Victor Andasan.....	East Yard Communities for Environmental Justice
Matt Arms.....	Port of Long Beach
Angie Balderas.....	Sierra Club
Honey Bizarro.....	East Yard Communities for Environmental Justice
Chris Chavez.....	Coalition for Clean Air
Trish Clary	Union Pacific Railroad
O.L. Cliatt II.....	Pacific Harbor Line
Curtis Coleman.....	Southern CA Air Quality Alliance
Laura Cortez.....	East Yard Communities for Environmental Justice
Ramine Cromartie.....	Western States Petroleum Association
Helena DuPont.....	California Strategies
Harvey Eder.....	Public Solar Power Coalition
Tim French	Public Member
Hortensia Galvez.....	Coalition for a Safe Environment
Fernando Gaytan.....	Earthjustice
Theral Golden.....	West Long Beach Association
Ma Carmen Gonzalez.....	People’s Collective for Env. Justice
Michele Grubbs.....	Pacific Merchant Shipping Association
Alison Hahm.....	National Resources Defense Council
Thomas Jelenic	Pacific Merchant Shipping Association
Gillian Kass.....	Ramboll
Bill La Marr.....	California Small Business Alliance
Raul Leon.....	East Yard Communities for Environmental Justice
David Libatique.....	Port of Los Angeles
Flor Boj Lopez.....	East Yard Communities for Environmental Justice
Marcos Lopez.....	East Yard Communities for Environmental Justice
Mark Lopez.....	East Yard Communities for Environmental Justice
Andrea Luna.....	East Yard Communities for Environmental Justice

Mark Lutz.....	Public Member
Artie Mandel.....	Port of Los Angeles
Jesse Marquez.....	Coalition for a Safe Environment
Bridget McCann.....	Chevron
Dan McGivney.....	SoCalGas
Fred Minassian.....	Public Member
Kristi Monji.....	Alta Environmental
Gem Montes.....	Public Member
Jacqueline Moore	Pacific Merchant Shipping Association
Alex Nieves.....	Public Member
Pancho Nopales.....	Public Member
Don Nguyen.....	Orange County Sanitation
Darby Osnaya.....	Sierra Club
David Pettit.....	Natural Resources Defense Council
Bethmarie Quiambao,	Southern California Edison
Theresa Romanosky.....	Association of American Railroads
David Rothbart.....	LA County Sanitation District
Tiff Sanchez.....	East Yard Communities for Environmental Justice
Arnold Sax.....	Public Member
Mario Salguero	Public Member
Tiff Sanchez.....	East Yard Communities for Environmental Justice
Melissa Schop.....	Union Pacific Railroad
Shay Syed.....	Public Member
Taylor Thomas	East Yard Communities for Environmental Justice
Heather Tomley	Port of Long Beach
Paola Vargas	East Yard Communities for Environmental Justice
Andrea Vidaure.....	People’s Collective for Environmental Justice
Lizbeth Zambrano-Sanchez.....	East Yard Communities for Environmental Justice
Debra Ashby.....	South Coast AQMD Staff
Barbara Baird.....	South Coast AQMD Staff
Rachel Ballon.....	South Coast AQMD Staff
Cindy Bustillos	South Coast AQMD Staff
Marc Carreras-Sospedra	South Coast AQMD Staff
Jack Cheng.....	South Coast AQMD Staff
Maria Corralejo.....	South Coast AQMD Staff
Javier Enriquez	South Coast AQMD Staff
Sheri Hanizavareh.....	South Coast AQMD Staff
Dillon Harris.....	South Coast AQMD Staff
Lauren Henninger.....	South Coast AQMD Staff
Mark Henninger.....	South Coast AQMD Staff
Scott Gallegos.....	South Coast AQMD Staff
Bay Gilchrist.....	South Coast AQMD Staff
Angela Kim	South Coast AQMD Staff
Ricky Lai.....	South Coast AQMD Staff
Ruby Laity.....	South Coast AQMD Staff
Jonathan Liu.....	South Coast AQMD Staff
Mikaela Lim.....	South Coast AQMD Staff

Myrna Nunez..... South Coast AQMD Staff
Jason Low South Coast AQMD Staff
Sujata Jain..... South Coast AQMD Staff
Ian MacMillan..... South Coast AQMD Staff
Terrence Mann South Coast AQMD Staff
Karin Manwaring..... South Coast AQMD Staff
Ron Moskowitz..... South Coast AQMD Staff
Susan Nakamura..... South Coast AQMD Staff
Wayne Nastri..... South Coast AQMD Staff
Lisa Tanaka O'Malley..... South Coast AQMD Staff
Sarah Rees..... South Coast AQMD Staff
Aisha Reyes..... South Coast AQMD Staff
Zafiro Sanchez..... South Coast AQMD Staff
Penny Shaw-Cedillo..... South Coast AQMD Staff
Nicole Silva South Coast AQMD Staff
Vanessa Tanik South Coast AQMD Staff
Sergio Torres Callejas South Coast AQMD Staff
Mei Wang South Coast AQMD Staff
Sam Wang..... South Coast AQMD Staff
Vicki White..... South Coast AQMD Staff
Paul Wright..... South Coast AQMD Staff
Victor Yip South Coast AQMD Staff
Alex Zhang..... South Coast AQMD Staff

DRAFT

BOARD MEETING DATE: September 1, 2023

AGENDA NO. xx

PROPOSAL : Request Approval of Proposed Membership Roster for the AQMP Advisory Group

SYNOPSIS : Staff is recommending that membership be granted for the AQMP Advisory Group for a new four-year term. The current term for the AQMP Advisory Group is set to expire on September 5, 2023. The AQMP Advisory Group consists of representatives from environmental/community groups, government agencies, academia, and businesses. The primary role of the AQMP Advisory Group is to review and provide recommendations to staff regarding the implementation of the 2022 AQMP and the development of SIPs aimed at demonstrating attainment of NAAQS. In December 2002, the Blue Ribbon Panel developed recommendations for the AQMP Advisory Group, including the applicable Board Committee. The proposed action seeks to have revisions to the AQMP Advisory Group membership reviewed by the Mobile Source instead of Stationary Source Committee and to approve suggested membership roster for the AQMP Advisory Group.

COMMITTEE : Reviewed Mobile Source, August 18, 2023 ; Recommended for Approval

RECOMMENDED ACTION S:

1. Revise the Blue Ribbon Panel recommendations to review changes to the membership of the AQMP Advisory Group with the Mobile Source Committee instead of the Stationary Source Committee.
2. Approve proposed membership roster for the AQMP Advisory Group (Attachment A) for a new four-year term.

Wayne Natri
Executive Officer

Background

In January 1997, the South Coast Air Quality Management District (South Coast AQMD) Board formed six Advisory Groups to provide advice and recommendations to Board Committees and the Board on specific areas of expertise. In December 2002, the Board adopted the Blue Ribbon Panel recommendations regarding the duties and activities of the Advisory Groups. Since then, the AQMP Advisory Group has contributed to the development of the overall aspects of the region's AQMPs and has made recommendations concerning policy, control measures, and attainment strategies. Specifically, the AQMP Advisory Group charter states that its mission is to: 1) review and provide comments on: (a) studies relevant to advancing scientific and technical knowledge in support of AQMP and SIP preparation, (b) emissions inventory development and modeling approaches, (c) the development of new and revised control strategies, including on- and off-road mobile sources, and (d) socioeconomic data and evaluations; 2) foster coordinated approaches toward overall attainment strategies and implementation of AQMPs; and 3) assist in resolving key technical issues. Currently, the Blue Ribbon Panel states that changes to the membership of the AQMP Advisory Group should be reviewed by the Stationary Source Committee. However, since all matters related to AQMPs are presented to the Mobile Source Committee, staff is recommending that changes to the membership of the AQMP Advisory Group be reviewed by the Mobile Source Committee.

The AQMP Advisory Group members are appointed by the South Coast AQMD Board. The AQMP Advisory Group charter calls for approximately 40 members comprised of representatives from environmental/community groups, government agencies, academia, and businesses. The previous membership roster for the AQMP Advisory Group was approved in September 2019 for a four-year term, expiring in September 2023.

Proposal

Staff is proposing a new membership roster for the AQMP Advisory Group to assist staff with various AQMP/SIP related projects for the new four-year term commencing upon the Board's approval and expiring in September 2027. The proposed membership roster for the AQMP Advisory Group is provided in Attachment A. The roster consists of 30 members representing partner agencies, government agencies, businesses, environmental/community groups, academic/research and labor. Business interests and environmental/community groups comprise the majority of the Advisory Group at approximately 43 percent and 23 percent of the proposed membership, respectively. The proposed membership roster was developed by soliciting nominations from existing Advisory Group members and public members. After the nomination process concluded, staff contacted representatives from under-represented group types to ensure the AQMP Advisory Group include a diverse stakeholder membership.

The duties of this Advisory Group includes reviewing and providing feedback on a SIP revision to demonstrate attainment of the 2012 annual PM2.5 National Ambient Air Quality Standard (NAAQS), implementation of the 2022 AQMP, as needed, and future AQMP/SIP revisions. The AQMP Advisory Group will meet throughout the year at various frequencies (e.g., monthly, quarterly) depending on the plan development schedule.

Resource Impacts

Existing South Coast AQMD resources are adequate to host the AQMP Advisory Group meetings.

Attachments

Proposed AQMP Advisory Group Roster

**Proposed Air Quality Management Plan Advisory Group Roster
September 2023 to September 2027**

ATTACHMENT A

No.	Affiliation	Group Type	Member	Alternate
1	American Coatings Association	Business	Rhett Cash	
2	California Air Resources Board (CARB)	Partner Agency	Michael Benjamin	Edie Chang
3	California Alliance of Small Business Associations	Business	Bill La Marr	
4	California Council for Environmental and Economic Balance	Business	Bill Quinn	Christine Wolfe
5	CEA Consulting	Business	Peter Okurowski	
6	Center for Community Action and Environmental Justice (CCA EJ)	Environmental/ Community	Ana Gonzalez	Marven Norman
7	Clean Energy	Business	Todd Campbell	Ryan Kenny
8	Clean Water SoCal	Govt. Agency	David Rothbart	Alison Torres
9	Community Environmental Services	Environmental/ Community	Mark Abramowitz	
10	Earthjustice	Environmental/ Community	Adrian Martinez	Fernando Gaytan
11	FuturePorts	Business	Varalakshmi Jayaram	
12	Holland & Knight LLP	Business	Brian Bunger	
13	International Longshore and Warehouse Union (ILWU)	Labor	Marcos R. Holguin	Marvin Fernando Pineda
14	Jet Propulsion Laboratory	Academic/Research	Greg Osterman	
15	Latham & Watkins LLP	Business	John C. Heintz	Jen Garlock
16	Los Angeles Area Chamber of Commerce	Business	Patricia Torres Bruno	Jacqueline Romero
17	Los Angeles County Metropolitan Transportation Authority (LA Metro)	Govt. Agency	Lori Huddleston	

**Proposed Air Quality Management Plan Advisory Group Roster
September 2023 to September 2027**

No.	Affiliation	Group Type	Member	Alternate
18	Natural Resources Defense Council (NRDC)	Environmental/ Community	David Pettit	Alison Hahm
19	Orange County Transportation Authority (OCTA)	Govt. Agency	Gregory Nord	
20	Pacific Environment	Environmental/ Community	Dawny'all Heydari	Teresa Bui
21	Pacific Merchant Shipping Association (PMSA)	Business	Thomas Jelenic	Jacqueline Moore
22	Redeemer Community Partnership	Environmental/ Community	Richard Parks	Brittney Lu
23	Riverside County Transportation Commission (RCTC)	Govt. Agency	Jenny Chan	Martha Masters
24	Sierra Club	Environmental/ Community	Yassi Kavezade	
25	South Bay Cities Council of Governments	Govt. Agency	Kim Fuentes	David Leger
26	Southern California Association of Governments (SCAG)	Partner Agency	Rongsheng Luo	Lijin Sun
27	Southern California Edison (SCE)	Business	Bethmarie Quiambao	
28	Southern California Gas (SoCalGas)	Business	Daniel McGivney	Jessilyn-Elise K. Davis
29	United States Environmental Protection Agency (U.S. EPA) Region 9	Partner Agency	Ben Machol	Ginger Vagenas
30	Western States Petroleum Association (WSPA)	Business	Ramine Cromartie	Patty Senecal

DRAFT

BOARD MEETING DATE: September 1, 2023

AGENDA NO. xx

PROPOSAL: Request Approval of Proposed Membership Roster for the Scientific, Technical, and Modeling Peer Review Advisory Group

SYNOPSIS: Staff is recommending that membership be granted for the Scientific, Technical, and Modeling Peer Review (STMPR) Advisory Group for a new four-year term. The current term for the Advisory Group is set to expire on September 5, 2023. The STMPR Advisory Group consists of experts in the fields of air quality modeling, atmospheric chemistry and physics, socioeconomic modeling, and public health. The primary role of the STMPR Advisory Group is to review scientific and technical approaches needed to develop a future AQMP/SIP aimed at demonstrating attainment of NAAQS. In December 2002, the Blue Ribbon Panel developed recommendations for the STMPR Advisory Group, including the applicable Board Committee. The proposed action seeks to approve suggested membership roster for the STMPR Advisory Group.

COMMITTEE: Reviewed: Mobile Source, August 18, 2023 ; Recommended for Approval

RECOMMENDED ACTION:

Approve proposed membership roster for the STMPR Advisory Group (Attachment A) for a new four-year term.

Wayne Natri
Executive Officer

Background

In January 1997, the South Coast Air Quality Management District (South Coast AQMD) Board formed six Advisory Groups to provide advice and recommendations to Board Committees and the Board on specific areas of expertise. In December 2002, the Board adopted the Blue Ribbon Panel recommendations regarding the duties and activities of the Advisory Groups. Since then, the STMPR Advisory Group has contributed to the development of the scientific and technical aspects of the region's AQMPs and have made recommendations concerning emission inventories, photochemical modeling and socioeconomic impacts. Specifically, this advisory group provides critical review of current air quality and socioeconomic modeling techniques, as well as recommendations for proposed new approaches.

The STMPR Advisory Group members are appointed by the SouthCoast AQMD Board. The STMPR Advisory Group charter calls for approximately 15 members. The proposed membership for the STMPR Advisory Group is comprised of experts in the fields of air quality modeling, atmospheric chemistry and physics, socioeconomic modeling, and a medical doctor. The previous membership roster for the Advisory Group was approved in September 2019 for a four-year term, expiring in September 2023.

Proposal

Staff is proposing a new membership roster for the STMPR Advisory Group to assist staff with various AQMP/SIP related projects for the new four-year term commencing upon the Board's approval and expiring in September 2027. The proposed membership roster for the STMPR Advisory Group is provided in Attachment A. The roster consists of eight experts in the fields of atmospheric chemistry, physics and air quality modeling, eight experts in the field of socioeconomics, and one physician. The proposed membership roster for the Advisory Group was developed by soliciting nominations from existing Advisory Group members and public members.

The duties of this advisory group will include reviewing and providing feedback on an AQMP/SIP modeling, socioeconomic modeling techniques and making recommendations for and comments on proposed new approaches. The Advisory Group will meet throughout the year at various frequencies (e.g., monthly, quarterly) depending on the plan development schedule.

Resource Impacts

Existing South Coast AQMD resources are adequate to host STMPR Advisory Group meetings.

Attachments

Proposed STMPR Advisory Group Roster

**Proposed Scientific, Technical, and Modeling Peer Review Advisory Group Roster
September 2023 to September 2027**

ATTACHMENT A

No.	Organization	Member	Alternate
1	California Air Resources Board	Dr. Anthony Oliver	
2	California Air Resources Board	Dr. Jeremy Avise	Dr. Chenxia Cai
3	Claremont Graduate University	Dr. Heather Campbell	Dr. Javier Rodriguez
4	Jet Propulsion Laboratory	Dr. Greg Osterman	
5	Self	Eric El-Togby, MD, MPH	
6	Ramboll	Mr. Ralph Morris	
7	Regional Economic Models, Inc.	Dr. Peter Evangelakis	Mr. Billy Leung
8	Southern California Association of Governments	Dr. John Cho	Dr. Mana Sangkapichai
9	University of California, Berkeley	Dr. Reed Walker	
10	University of California, Davis	Dr. Michael Kleeman	
11	University of California, Davis	Dr. Erich Muehlegger	
12	University of California, Irvine	Dr. Alex Gunther	
13	University of California, Los Angeles	Dr. Pablo Saide	
14	University of California, San Diego	Dr. Joshua Graff Zivin	
15	University Corporation for Atmospheric Research	Dr. Kelley Barsanti	
16	US Environmental Protection Agency	Mr. Ken Davidson	
17	US Environmental Protection Agency, Region 9	Dr. Rynda Kay	Dr. William Tsui

**Proposed Scientific, Technical, and Modeling Peer Review Advisory Group Roster
September 2023 to September 2027**

No.	Organization	Member	Alternate
1	California Air Resources Board	Dr. Anthony Oliver	
2	California Air Resources Board	Dr. Jeremy Avise	Dr. Chenxia Cai
3	Claremont Graduate University	Dr. Heather Campbell	Dr. Javier Rodriguez
4	Jet Propulsion Laboratory	Dr. Greg Osterman	
5	Self	Eric El-Togby, MD, MPH	
6	Ramboll	Mr. Ralph Morris	
7	Regional Economic Models, Inc.	Dr. Peter Evangelakis	Mr. Billy Leung
8	Southern California Association of Governments	Dr. John Cho	Dr. Mana Sangkapichai
9	University of California, Berkeley	Dr. Reed Walker	
10	University of California, Davis	Dr. Michael Kleeman	
11	University of California, Davis	Dr. Erich Muehlegger	
12	University of California, Irvine	Dr. Alex Gunther	
13	University of California, Los Angeles	Dr. Pablo Saide	
14	University of California, San Diego	Dr. Joshua Graff Zivin	
15	University Corporation for Atmospheric Research	Dr. Kelley Barsanti	
16	US Environmental Protection Agency	Mr. Ken Davidson	
17	US Environmental Protection Agency, Region 9	Dr. Rynda Kay	Dr. William Tsui



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

Rule 2202 Summary Status Report Activity for January 1, 2023 – July 31, 2023

Employee Commute Reduction Program (ECRP)	
# of Submittals:	218

Emission Reduction Strategies (ERS)	
# of Submittals:	100

Air Quality Investment Program (AQIP) Exclusively		
County	# of Facilities	\$ Amount
Los Angeles	36	\$ 157,309
Orange	2	\$ 15,982
Riverside	2	\$ 9,720
San Bernardino	0	\$ 0
TOTAL:	40	\$ 183,011

ECRP w/AQIP Combination		
County	# of Facilities	\$ Amount
Los Angeles	0	\$ 0
Orange	0	\$ 0
Riverside	0	\$ 0
San Bernardino	0	\$ 0
TOTAL:	0	\$ 0

Total Active Sites as of July 31, 2023

ECRP (AVR Surveys)			TOTAL Submittals w/Surveys	AQIP	ERS	TOTAL
ECRP ¹	AQIP ²	ERS ³				
524	8	71	603	101	648	1,352
38.75%	0.59%	5.25%	44.59%	7.47%	47.94%	100% ⁴

Total Peak Window Employees as of July 31, 2023

ECRP (AVR Surveys)			TOTAL Submittals w/Surveys	AQIP	ERS	TOTAL
ECRP ¹	AQIP ²	ERS ³				
372,164	2,760	11,006	385,930	13,674	277,585	677,189
54.95%	0.41%	1.63%	56.99%	2.02%	40.99%	100% ⁴

- Notes:**
1. ECRP Compliance Option.
 2. ECRP Offset (combines ECRP w/AQIP). AQIP funds are used to supplement the ECRP AVR survey shortfall.
 3. ERS with Employee Survey to get Trip Reduction credits. Emission/Trip Reduction Strategies are used to supplement the ECRP AVR survey shortfall.
 4. Totals may vary slightly due to rounding.

DRAFT

BOARD MEETING DATE: September 1, 2023

AGENDA NO.

REPORT: Intergovernmental Review of Environmental Documents and CEQA Lead Agency Projects

SYNOPSIS: This report provides a listing of environmental documents prepared by other public agencies seeking review by South Coast AQMD between July 1, 2023 and July 31, 2023, and proposed projects for which South Coast AQMD is acting as lead agency pursuant to CEQA.

COMMITTEE: Mobile Source, August 18, 2023, Reviewed

RECOMMENDED ACTION:
Receive and file.

Wayne Natri
Executive Officer

SR:MK:MM:BR:SW:ET

Background

The California Environmental Quality Act (CEQA) Statute and Guidelines require public agencies, when acting in their lead agency role, to provide an opportunity for other public agencies and members of the public to review and comment on the analysis in environmental documents prepared for proposed projects. A lead agency is when a public agency has the greatest responsibility for supervising or approving a proposed project and is responsible for the preparation of the appropriate CEQA document.

Each month, South Coast AQMD receives environmental documents, which include CEQA documents, for proposed projects that could adversely affect air quality. South Coast AQMD fulfills its intergovernmental review responsibilities, in a manner that is consistent with the Board's 1997 Environmental Justice Guiding Principles and

Environmental Justice Initiative #4, by reviewing and commenting on the adequacy of the air quality analysis in the environmental documents prepared by other lead agencies.

The status of these intergovernmental review activities is provided in this report in two sections: 1) Attachment A lists all of the environmental documents prepared by other public agencies seeking review by South Coast AQMD that were received during the reporting period; and 2) Attachment B lists the active projects for which South Coast AQMD has reviewed or is continuing to conduct a review of the environmental documents prepared by other public agencies. Further, as required by the Board's October 2002 Environmental Justice Program Enhancements for fiscal year (FY) 2002-03, each attachment includes notes for proposed projects which indicate when South Coast AQMD has been contacted regarding potential air quality-related environmental justice concerns. The attachments also identify for each proposed project, as applicable: 1) the dates of the public comment period and the public hearing date; 2) whether staff provided written comments to a lead agency and the location where the comment letter may be accessed on South Coast AQMD's website; and 3) whether staff testified at a hearing.

In addition, the South Coast AQMD will act as lead agency for a proposed project and prepare a CEQA document when: 1) air permits are needed; 2) potentially significant adverse impacts have been identified; and 3) the South Coast AQMD has primary discretionary authority over the approvals. Attachment C lists the proposed air permit projects for which South Coast AQMD is lead agency under CEQA.

Attachment A – Log of Environmental Documents Prepared by Other Public Agencies and Status of Review, and Attachment B – Log of Active Projects with Continued Review of Environmental Documents Prepared by Other Public Agencies

Attachment A contains a list of all environmental documents prepared by other public agencies seeking review by South Coast AQMD that were received pursuant to CEQA or other regulatory requirements. Attachment B provides a list of active projects, which were identified in previous months' reports, and which South Coast AQMD staff is continuing to evaluate or prepare comments relative to the environmental documents prepared by other public agencies. The following table provides statistics on the status of review¹ of environmental documents for the current reporting period for Attachments A and B combined²:

¹ The status of review reflects the date when this Board Letter was prepared. Therefore, Attachments A and B may not reflect the most recent updates.

² Copies of all comment letters sent to the lead agencies are available on South Coast AQMD's website at: <http://www.aqmd.gov/home/regulations/ceqa/commenting-agency>.

Statistics for Reporting Period from July 1, 2023 to July 31, 2023	
Attachment A: Environmental Documents Prepared By Other Public Agencies and Status of Review	40
Attachment B: Active Projects With Continued Review of Environmental Documents Prepared By Other Public Agencies (which were previously identified in the May 2023 and June 2023 reports)	20
Total Environmental Documents Listed in Attachment s A & B	60
<i>Comment letters sent</i>	<i>13</i>
<i>Environmental documents reviewed, but no comments were made</i>	<i>26</i>
<i>Environmental documents currently under going review</i>	<i>21</i>

Staff focuses on reviewing and preparing comments on environmental documents prepared by other public agencies for proposed projects: 1) where South Coast AQMD is a responsible agency under CEQA (e.g., when air permits are required but another public agency is lead agency); 2) that may have significant adverse regional air quality impacts (e.g., special event centers, landfills, goods movement); 3) that may have localized or toxic air quality impacts (e.g., warehouse and distribution centers); 4) where environmental justice concerns have been raised; and 5) which a lead or responsible agency has specifically requested South Coast AQMD review.

If staff provided written comments to a lead agency, a hyperlink to the “South Coast AQMD Letter” is included in the “Project Description” column which corresponds to a notation is in the “Comment Status” column. In addition, if staff testified at a hearing for a proposed project, a notation is also included in the “Comment Status” column. Copies of all comment letters sent to lead agencies are available on South Coast AQMD’s website at: <http://www.aqmd.gov/home/regulations/ceqa/commenting-agency>. Interested parties seeking information regarding the comment periods and scheduled public hearings for projects listed in Attachments A and B should contact the lead agencies for further details as these dates are occasionally modified.

In January 2006, the Board approved the Clean Port Initiative Workplan (Workplan). One action item of the Workplan 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 accordance with this action item, Attachments A and B organize the environmental documents received according to the following categories: 1) goods movement projects; 2) schools; 3) landfills and wastewater projects; 4) airports; and 5) general land use projects. In response to the action item relative to mitigation, staff maintains a compilation of mitigation measures presented as a series of tables relative to off-road engines; on-road engines; harbor craft; ocean-going vessels; locomotives; fugitive dust; and greenhouse gases which are available on South Coast AQMD’s website at:

<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>. Staff will continue compiling tables of mitigation measures for other emission sources such as ground support equipment.

Attachment C – Proposed Air Permit Projects For Which South Coast AQMD is CEQA Lead Agency

The CEQA lead agency is responsible for determining the type of environmental document to be prepared if a proposal requiring discretionary action is considered to be a “project” as defined by CEQA. South Coast AQMD periodically acts as lead agency for its air permit projects and the type of environmental document prepared may vary depending on the potential impacts. For example, an Environmental Impact Report (EIR) is prepared when there is substantial evidence that the project may have significant adverse effects on the environment. Similarly, a Negative Declaration (ND) or Mitigated Negative Declaration (MND) may be prepared if a proposed project will not generate significant adverse environmental impacts, or the impacts can be mitigated to less than significance. The ND and MND are types of CEQA documents which analyze the potential environmental impacts and describe the reasons why a significant adverse effect on the environment will not occur such that the preparation of an EIR is not required.

Attachment C of this report summarizes the proposed air permit projects for which South Coast AQMD is lead agency and is currently preparing or has prepared environmental documentation pursuant to CEQA. As noted in Attachment C, South Coast AQMD is lead agency for three air permit projects during July 2023.

Attachments

- A. Environmental Documents Prepared by Other Public Agencies and Status of Review
- B. Active Projects With Continued Review of Environmental Documents Prepared by Other Public Agencies
- C. Proposed Air Permit Projects For Which South Coast AQMD is CEQA Lead Agency

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
July 1, 2023 to July 31, 2023

SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Warehouse & Distribution Centers</i> ORC230719-13 Amazon Parcel Delivery Facility Project	The project consists of demolition of a 637,503 square foot office building and construction of a 181,500 square foot warehouse on 31.52 acres. The project is located at 275 Valencia Avenue near the southwest corner of Valencia Avenue and East Birch Street. Comment Period: 7/13/2023 - 8/11/2023 Public Hearing: 7/24/2023	Notice of Preparation	City of Brea	** Under review, may submit written comments
<i>Warehouse & Distribution Centers</i> RVC230712-02# Mead Valley Commerce Center (PPT 220050, CZ 2200062, TPM 38601)	The project consists of construction of a 1,003,510 square foot warehouse on 44.74 acres and a park on 13.35 acres. The project is located near the southwest corner of Seaton Avenue and Cajalco Expressway in Perris. http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/july-2023/RVC230712-02.pdf Comment Period: 6/29/2023 - 7/28/2023 Public Hearing: 7/24/2023	Notice of Preparation	Riverside County	South Coast AQMD staff commented on 7/27/2023
<i>Warehouse & Distribution Centers</i> RVC230719-03 Temescal Valley Commerce Center	The project consists of construction of seven warehouse buildings totaling 637,718 square feet on 46.13 acres. The project is located on the southeast corner of Temescal Canyon Road and Dawson Canyon Road in the community of Temescal Valley. Reference RVC230201-02 and RVC21119-0 Comment Period: N/A Public Hearing: N/A	Other	County of Riverside	Document reviewed - No comments sent for this document received
<i>Warehouse & Distribution Centers</i> RVC230719-04# Mead Valley Commerce Center (PPT 220050, CZ 2200062, TPM 38601)	The project consists of a case transmittal for construction of a 1,003,510 square foot warehouse on 44.74 acres and a park on 13.35 acres. The project is located near the southwest corner of Seaton Avenue and Cajalco Expressway in Perris. Reference RVC230712-02 Comment Period: N/A Public Hearing: N/A	Other	County of Riverside	Document reviewed - No comments sent for this document received

*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
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
July 1, 2023 to July 31, 2023

SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Warehouse & Distribution Centers</i> RVC230721-01 79 North Logistics Center	The project consists of construction of a 404,200 square foot warehouse on 20.06 acres. The project is located at 853 East 3rd Street near the southeast corner of East 3rd Street and Maple Avenue. Comment Period: 7/21/2023 - 8/2/2023 Public Hearing: 8/3/2023	Site Plan	City of Beaumont	** Under review, may submit written comments
<i>Warehouse & Distribution Centers</i> SBC230705-03 Lilac Avenue and Santa Ana Avenue Warehouse Project	The project consists of demolition of three existing structures and construction of a 301,000 square foot of warehouse on 13.68 acres. The project is located near the southwest corner of South Lilac Avenue and West Santa Ana Avenue. Comment Period: 6/28/2023 - 7/27/2023 Public Hearing: N/A	Notice of Intent to Adopt Mitigated Negative Declaration	City of Rialto	Document reviewed - No comments sent for this document received
<i>Warehouse & Distribution Centers</i> SBC230712-08 Cherry Commerce Center	The project consists of construction of 702,000 square feet warehouses on 30 acres. The project is located near the northeast corner of Cherry Avenue and Jurupa Avenue. Comment Period: 7/7/2023 - 8/7/2023 Public Hearing: 7/19/2023	Notice of Preparation	City of Fontana	** Under review, may submit written comments
<i>Warehouse & Distribution Centers</i> SBC230712-11 436 West Rialto Avenue Warehouse	The project consists of construction of a 287,780 square foot warehouse on 13.83 acres. The project is located on the northeast corner of Rialto Avenue and Lilac Avenue. Reference SBC230516-15 Staff previously provided comments on the Mitigated Negative Declaration for the project, which can be accessed at: http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/june-2023/SBC230516-15.pdf . Comment Period: N/A Public Hearing: N/A	Response to Comments	City of Rialto	Document reviewed - No comments sent for this document 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
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
July 1, 2023 to July 31, 2023

SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Industrial and Commercial</i> LAC230705-02 Violet Street Creative Office Campus Project	The project consists of demolition of 57,618 square feet of existing structures and construction of 450,599 square foot of office building on 6.3 acres. The project is located on the northeast corner of Violet Street and Mateo Street in Central City North. Reference LAC211109-0 Comment Period: 6/29/2023 - 8/14/2023 Public Hearing: N/A	Draft Environmental Impact Report	City of Los Angeles	Document reviewed - No comments sent for this document received
<i>Industrial and Commercial</i> LAC230712-04 Development Plan Approval Case No. 1002	The project consists of construction of a 104,900 square foot industrial building. The project is located at 13711 Freeway Drive near the northeast corner of Spring Avenue and Freeway Drive. Comment Period: N/A Public Hearing: 7/10/2023	Other	City of Santa Fe Springs	Document reviewed - No comments sent for this document received
<i>Industrial and Commercial</i> SBC230719-05 Philadelphia Street Industrial Development Site and East End Annexation project (PL20-0003, PL20-0004, PL20-0005)	The project consists of annexation of 56.87 acres of land from unincorporated San Bernardino County and construction of three industrial building totaling 63,900 square feet on 3.95 acres. The project is located near the southwest corner of Francis Avenue and East End Avenue. Comment Period: 6/28/2023 - 7/18/2023 Public Hearing: 7/19/2023	Notice to Intent to Adopt Mitigated Negative Declaration	City of Chino	Document reviewed - No comments sent for this document received
<i>Waste and Water-related</i> LAC230705-05 Summer Ecobat Formerly Quemetco	The project consists of an update to Summer Ecobat, an existing hazardous waste facility formerly known as Quemetco. The project is located at 720 South Seventh Avenue near the northeast corner of South Seventh Avenue and Salt Lake Avenue in Industry. Reference LAC230606-03, LAC230418-08, LAC220621-11, LAC220301-09, LAC211001-05, LAC210907-04, LAC210907-03, LAC210427-09, LAC210223-04, LAC210114-07, LAC191115-02, and LAC180726-06 Comment Period: N/A Public Hearing: 7/20/2023	Other	Department of Toxic Substances Control	Document reviewed - No comments sent for this document 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
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
July 1, 2023 to July 31, 2023

SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Waste and Water-related</i> RVC230705-04 Meridian Storm Drain Extension Project	The project consists of construction of an underground 6-foot by 4-foot reinforced concrete box (RCB) from an existing RCB, extending 2,350 linear feet south and connecting to existing reinforced concrete pipe (RCP). The project is located near the southwest corner of the Interstate 215 and Van Buren Boulevard. Comment Period: 6/28/2023 - 7/30/2023 Public Hearing: 9/13/2023	Notice of Intent to Adopt Mitigated Negative Declaration	March Joint Powers Authority	Document reviewed - No comments sent for this document received
<i>Transportation</i> ORC230719-14 I-5/El Toro Road Interchange Project	The project consists of modification of Interstate 5 (I-5) and El Toro Road Interchange (PM 17.8/19.7) to improve traffic flow, optimize traffic signalization, and reduce freeway ramp queuing. The project is located within the cities of Lake Forest, Laguna Woods, and Laguna Hills. Comment Period: 7/11/2023 - 8/25/2023 Public Hearing: 7/26/2023	Notice of Preparation	California Department of Transportation	** Under review, may submit written comments
<i>Institutional (schools, government, etc.)</i> LAC230719-07 School Upgrade Program (SUP)	The project consists of major modernizations, upgrades, and reconfigurations to school campuses in the Los Angeles Unified School District (LAUSD) under Measure RR that was passed in 2020 to address significant and unfunded needs of Los Angeles public school facilities. The project encompasses 710 square miles and is bounded by Burbank to the north, 710 freeway to the east, San Pedro to the south, and the Pacific Ocean to the west. The project includes four designated AB 617 communities: 1) East Los Angeles, Boyle Heights, West Commerce, 2) Southeast Los Angeles, 3) South Los Angeles, and 4) Wilmington, Carson, West Long Beach. Comment Period: 7/5/2023 - 8/19/2023 Public Hearing: N/A	Draft Subsequent Program Environmental Impact Report	Los Angeles Unified School District	** Under review, may submit written comments
<i>Institutional (schools, government, etc.)</i> LAC230719-12 Sunset Canyon Recreation Replacement Building Project	The project consists of demolition of seven buildings totaling 6,982 square feet and construction of a 11,500 square foot student-oriented, multi-purpose building on 0.86 acre. The project is located at 111 Easton Drive, near the northwest corner of Easton Drive and De Neve Drive in Los Angeles. Reference: LAC170829-01, LAC170824-04, and LAC170505-07 Comment Period: 7/17/2023 - 8/16/2023 Public Hearing: 8/1/2023	Notice of Preparation	University of California, Los Angeles	Document reviewed - No comments sent for this document 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
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
July 1, 2023 to July 31, 2023

SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Institutional (schools, government, etc.)</i> ORC230719-06 Patrick Henry Elementary School Reconstruction Project	The project consists of demolition of 50,335 square feet building space and reconstruction of 119,139 square feet building space for educational use. The project is located at 1123 West Romneya Drive in Anaheim. Comment Period: 7/17/2023 - 8/15/2023 Public Hearing: N/A	Notice to Intent to Adopt Mitigated Negative Declaration	Anaheim Elementary School District	Document reviewed - No comments sent for this document received
<i>Institutional (schools, government, etc.)</i> ORC230719-08 Los Alamitos High School Gymnasium Project	The project consists of construction of a 32,000 square foot gymnasium on a 1.4 acres portion of the 50-acres Los Alamitos High School campus. The project is located at 3591 West Cerritos Avenue in Los Alamitos near the northeast corner of East Spring Street and Norwalk Boulevard in Los Alamitos. Comment Period: 7/13/2023 - 8/1/2023 Public Hearing: 8/22/2023	Notice to Intent to Adopt Mitigated Negative Declaration	Los Alamitos Unified School District	Document reviewed - No comments sent for this document received
<i>Institutional (schools, government, etc.)</i> RVC230712-01 Calvary Chapel CUP2023-0074	The project consists of construction of three buildings totaling 23,700 square feet on 4.75 acres. The project is located at 1780 Orchard Heights Avenue near the southeast corner of Brookside Avenue and Orchard Heights Avenue. Comment Period: 7/11/2023 - 7/26/2023 Public Hearing: 7/27/2023	Site Plan	City of Beaumont	Document reviewed - No comments sent for this document received
<i>Institutional (schools, government, etc.)</i> RVC230712-10 The KC-46A Main Operating Base 5 (MOB 5) Beddown at Grissom ARB, Indiana, March ARB, California or Tinker AFB, Oklahoma	The project consists of relocation and operation of military aircraft (KC-46A tanker aircraft), personnel, and infrastructure on March Air Reserve Base. The project is located near the southeast corner of Cactus Avenue and Heacock Street in Riverside. Reference RVC221201-05 Comment Period: 7/12/2023 - 8/14/2023 Public Hearing: 7/18/2023	Draft Environmental Impact Statement	Department of Defense, Department of Air Force	** 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
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
July 1, 2023 to July 31, 2023

SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
Retail LAC230712-07 Avid Hotel Project	The project consists of construction of a 30,200 square foot hotel on 0.84 acre. The project is located near the northeast corner of North Azusa Avenue and Glentana Street. Comment Period: 7/6/2023- 8/7/2023 Public Hearing: N/A	Notice of Intent to Adopt Mitigated Negative Declaration	City of Covina	Document reviewed - No comments sent for this document received
Retail RVC230719-02 Tentative Parcel Map No. 38695 / Conditional Use Permit No. 230014	The project consists of subdivision of one parcel into eleven parcels ranging from 1.18 to 1.97 acres and construction of a commercial center on 19.42 acres. The project is located at the southeast corner of Auld Road and Pourroy Road in Murrieta. Comment Period: N/A Public Hearing: N/A	Other	Riverside County	Document reviewed - No comments sent for this document received
General Land Use (residential, etc.) LAC230705-01 District NoHo Project	The project consists of construction of 1,527 residential units totaling 1,523,528 square feet, 105,125 square feet of retail uses, and 580,374 square feet of office space on 16 acres. The project is located near the southeast corner of Burbank Boulevard and Lankershim Avenue in North Hollywood. Reference LAC220407-03 Comment Period: N/A Public Hearing: 7/26/2023	Final Environmental Impact Report	City of Los Angeles	Document reviewed - No comments sent for this document received
General Land Use (residential, etc.) LAC230719-11 Paseo Marina Project (ENV-2016-3343-EIR)	The project consists of demolition of three buildings totaling 100,781 square feet and proposes two options on 6.06 acres: A) Construction of 658 residential units and 27,300 square feet for commercial uses. B) Construction of 425 residential units, 90,000 square feet for office uses, and 40,000 square feet for commercial uses. The project is located on the southwest corner of Maxella Avenue and Glencoe Avenue. Reference LAC190307-06, LAC170627-03, LAC170614-05 Comment Period: 7/13/2023- 8/28/2023 Public Hearing: N/A	Draft Environmental Impact Report	City of Los Angeles	** 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
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
July 1, 2023 to July 31, 2023

SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Plans and Regulations</i> LAC230726-06 South Pasadena General Plan and Downtown Specific Plan Update, and 2021-2029 Housing Element	The project consists of updates to the City's General Plan Housing Element to demonstrate there is sufficient capacity to construct 2,775 residential units on 2,272 acres of planning area. The project is bounded by Pasadena to the north, San Marino to the east, Alhambra to the south, and Los Angeles to the southwest within the designated AB 617 East Los Angeles, Boyle Heights, West Commerce community. Reference LAC210422-01 and LAC180202-01 Comment Period: 7/24/2023 - 9/6/2023 Public Hearing: 8/8/2023	Draft Program Environmental Impact Report	City of South Pasadena	** Under review, may submit written comments
<i>Plans and Regulations</i> ORC230705-06 City of Newport Beach Housing Implementation Program	The project consists of the City's 2021-2029 Housing Element plan to establish programs, policies, and actions for future construction of all income housing in six areas of Newport Beach: Airport Area, West Newport Mesa, Dover-Westcliff, Newport Center, Coyote Canyon, and Banning Ranch. The project is bounded by Interstate 405 to the North, State Route 73 to east, and the Pacific Ocean to the south and west. http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/july-2023/ORC230705-06.pdf Comment Period: 6/27/2023 - 7/27/2023 Public Hearing: 7/10/2023	Notice of Preparation	City of Newport Beach	South Coast AQMD staff commented on 7/26/2023
<i>Plans and Regulations</i> ORC230719-16 General Plan Housing Element Update	The project consists of revisions to the City's Housing Element Plan (2021-2029) which includes policies and programs to facilitate construction, rehabilitation, and preservation of housing for all economic segments of the community. The project encompasses 18.03 square miles and is bounded by Lake Forest to the north, Rancho Santa Margarita and Las Flores to the east, San Juan Capistrano to the south, and Laguna Hills to the west. Comment Period: 6/1/2023 - 6/27/2023 Public Hearing: 6/12/2023	Other	City of Mission Viejo	Document reviewed - No comments sent for this document received
<i>Plans and Regulations</i> RVC230726-01 Highway 74 Community Plan (GPA No. 1205) and Zone Consistency Program	The project consists of modifications to existing land use designations and policies for future construction of residential units, commercial, retail, light industrial, business park, public facilities, rural, open space, and recreational uses on 2,220 acres. The project is located in Riverside County between City of Perris and Lake Elsinore along a 6.8-mile segment of Highway 74. Reference RVC190515-01 Comment Period: 7/26/2023 - 8/2/2023 Public Hearing: 8/2/2023	Final Environmental Impact Report	Riverside County Planning Department	Document reviewed - No comments sent for this document 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 B*
ACTIVE PROJECTS WITH CONTINUED REVIEW OF ENVIRONMENTAL DOCUMENTS
PREPARED BY OTHER PUBLIC AGENCIES

<u>SOUTH COAST AQMD LOG-IN NUMBER</u>	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Waste and Water-related</i> LAC230606-05 Former Renu Plating Company, Inc. (Proposed Nevin Park Site)	The project consists of a Soil Management Plan (SMP) to remove the top two feet of soil and replace with clean imported fill for the future development of a park on 0.25 acre. The project is located near the northeast corner of Compton Avenue and East 32nd Street in Los Angeles within the designated AB 617 South Los Angeles community. Reference LAC141008-02 Comment Period: N/A Public Hearing: N/A	Other	Department of Toxic Substances Control	**Under review, may submit written comments
<i>Waste and Water-related</i> LAC230621-03 Avenue 34 Project	The project consists of ongoing environmental investigation and cleanup actions to excavate, remove, and dispose 24,800 cubic yards of soil contaminated with volatile organic compounds, and installation of a soil vapor extraction system on 5 acres. The project is located on the northwest corner of West Avenue 34 and Pasadena Avenue in Lincoln Heights within Los Angeles. Reference LAC211109-09, LAC210901-09 and LAC170216-01 Comment Period: N/A Public Hearing: N/A	Other	Department of Toxic Substances Control	**Under review, may submit written comments
<i>Waste and Water-related</i> LAC230621-07 United Technologies Corporations Canoga Avenue Site (Formerly Pratt & Whitney-Rocketdyne Site)	The project consists of an update for cleanup activities of chlorinated volatile organic compounds (CVOCs), primarily tetrachloroethene (PCE), and trichloroethene (TCE) on 47 acres at the United Technologies Corporation site. The project is located at 6633 Canoga Avenue on the southwest corner of Canoga Avenue and Vanowen Street in Los Angeles. Reference LAC141210-02 Comment Period: N/A Public Hearing: N/A	Community Notice	Los Angeles Regional Water Quality Control Board	**Under review, may submit written comments
<i>Waste and Water-related</i> LAC230628-01 Fremont Elementary School	The project consists of excavation and disposal of 77 cubic yards of soil contaminated with lead, arsenic, and total petroleum hydrocarbons on 3.8 acres. The project is located at 4000 East Fourth Street on the northwest corner of Roswell Avenue and East Vermont Street in Long Beach. Reference LAC220921-10 and LAC220503-02 Comment Period: N/A Public Hearing: N/A	Other	Department of Toxic Substances Control	**Under review, may submit written comments

*Sorted by Comment Status, followed by Land Use, then 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

ATTACHMENT B
ACTIVE PROJECTS WITH CONTINUED REVIEW OF ENVIRONMENTAL DOCUMENTS
PREPARED BY OTHER PUBLIC AGENCIES

SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Waste and Water-related</i> ODP230608-01 Santa Susana Field Laboratory	The project consists of development of cleanup activities to excavate, remove, and dispose contaminated soil with polycyclic aromatic hydrocarbons, total petroleum hydrocarbons, and dioxins on a 450-acre portion of 2,850 acres. The project is located on the southeast corner of Service Area Road and Woolsey Canyon Road in Ventura County. Reference ODP200724-03, ODP191113-01, ODP181221-07, ODP180904-15, ODP180814-10, ODP170926-03, ODP170915-02, ODP170908-05, ODP170420-07, ODP170405-01, ODP140116-02, ODP131121-02, LAC131018-05, LAC130918-13, LAC110510-12, and ODP100930-02 Comment Period: N/A Public Hearing: N/A	Final Program Environmental Impact Report	Department of Toxic Substances Control	**Under review, may submit written comments
<i>Waste and Water-related</i> ORC230516-03 Ascon Landfill Site	The project consists of pilot testing of odor control technologies to restart remediation at the Ascon Landfill Site. The project is located at 21641 Magnolia Street near the southeast corner of Magnolia Street and Hamilton Avenue in Huntington Beach. Comment Period: N/A Public Hearing: 5/31/2023	Other	Department of Toxic Substances Control	**Under review, may submit written comments
<i>Waste and Water-related</i> SBC230628-02 Lighting Resources, LLC	The project consists of an appeal to the standardized hazardous waste facility permit for Lighting Resources, LLC. The project is located at 805 East Francis Street near the northeast corner of East Francis Street and East Campus Avenue in Ontario. Reference SBC210817-03, SBC210518-10, SBC210323-08, SBC181031-01, and SBC171107-09 Comment Period: N/A Public Hearing: 10/26/2023	Other	Department of Toxic Substances Control	**Under review, may submit written comments
<i>General Land Use (residential, etc.)</i> SBC230628-04 Gateway at Grand Terrace Specific Plan	The project consists of construction of 750 residential units, 359,218 square feet of commercial uses, 6.99 acres of roadway improvements, 16.65 acres of drainage facilities, and 9.18 acres of open space on 112 acres. The project is located on the southeast corner of Barton Road and Interstate 215. Reference SBC210209-02 and SBC180426-03 Comment Period: 6/26/2023 - 8/14/2023 Public Hearing: N/A	Draft Environmental Impact Report	City of Grand Terrace	**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

ATTACHMENT B
ACTIVE PROJECTS WITH CONTINUED REVIEW OF ENVIRONMENTAL DOCUMENTS
PREPARED BY OTHER PUBLIC AGENCIES

<u>SOUTH COAST AQMD LOG-IN NUMBER</u> PROJECT TITLE	PROJECT DESCRIPTION	TYPE OF DOC.	LEAD AGENCY	COMMENT STATUS
<i>Industrial and Commercial</i> LAC230613-16 Romaine & Sycamore	The project consists of demolition of three existing buildings totaling 3,535 square feet and construction of a 200,990 square foot commercial building on 2.05 acres. The project located on the southeast corner of Romaine Street and Sycamore Avenue. http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/july-2023/LAC230613-16.pdf Comment Period: 6/9/2023- 7/10/2023 Public Hearing: N/A	Notice of Preparation	City of Los Angeles	South Coast AQMD staff commented on 7/7/2023
<i>Waste and Water-related</i> ODP230621-09 Otay Ranch Village 3	The project consists of installation of Sub-Slab Ventilation (SSV) with a Vapor Barrier to address soil contaminated with methane and Volatile Organic Compounds (VOCs) on 9.73 acres. The project is located near the northeast corner of Heritage Road and Paseo Cultura in Chula Vista. http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/july-2023/ODP230621-09.pdf Comment Period: 6/16/2023 - 7/17/2023 Public Hearing: N/A	Draft Removal Action Workplan	Department of Toxic Substances Control	South Coast AQMD staff commented on 7/17/2023
<i>Waste and Water-related</i> ORC230628-10 Sunrise Village	The project consists of two cleanup alternatives to address areas of soil and soil gas contaminated with solvent volatile organic compounds (VOCs): 1) Contaminated soil will be excavated, stockpiled, and transported for disposal at a permitted facility, and 2) Installation of a Vapor Intrusion Mitigation System (VIMS) beneath future residential buildings which can be activated to prevent entry of chemical vapors into the building. The project is located at 1801 North Euclid Street near southwest corner of Rosecrans Avenue and Euclid Street in Fullerton. http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/july-2023/ORC230628-10.pdf Comment Period: 6/29/2023 - 7/31/2023 Public Hearing: N/A	Draft Response Plan	Department of Toxic Substances Control	South Coast AQMD staff commented on 7/27/2023
<i>General Land Use (residential, etc.)</i> SBC230616-01 Hosanna Village Apartments	The project consists of construction of 60 residential units on 5.12 acres. The project is located 2971 South La Cadena Drive near the northwest corner of Iowa Avenue and West Main Street. http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/july-2023/SBC230616-01.pdf Comment Period: 6/17/2023 - 7/10/2023 Public Hearing: 7/25/2023	Notice of Intent to Adopt a Mitigated Negative Declaration	City of Colton	South Coast AQMD staff commented on 7/7/2023
<i>Plans and Regulations</i> LAC230606-10 Diamond Bar Town Center Specific Plan	The project consists of construction of 2,055 residential units, a hotel with 150 rooms, 40,000 square feet of public open space, and 415,000 square feet of commercial uses on approximately 45 acres. The project is bounded by State Route 60 to the north, El Vado Road and Torito Lane to the east, Golden Springs Drive to the south, and South Prospectors Road to the west. http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/july-2023/LAC230606-10.pdf Comment Period: 6/5/2023 - 7/5/2023 Public Hearing: 6/8/2023	Notice of Preparation	City of Diamond Bar	South Coast AQMD staff commented on 7/5/2023

- 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
PROPOSED AIR PERMIT PROJECTS FOR
WHICH SOUTH COAST AQMD IS CEQA LEAD
AGENCY THROUGH JULY 31, 2023**

PROJECT DESCRIPTION	PROPONENT	TYPE OF DOCUMENT	STATUS	CONSULTANT
<p>Quemetco is proposing to modify existing South Coast AQMD permits to allow the facility to recycle more batteries and to eliminate the existing daily idle time of the furnaces. The proposed project will increase the rotary feed drying furnace feed rate limit from 600 to 750 tons per day and increase the amount of total coke material allowed to be processed. In addition, the project will allow the use of petroleum coke in lieu of or in addition to calcined coke, and remove one existing emergency diesel-fueled internal combustion engine (ICE) and install two new emergency natural gas-fueled ICEs.</p>	<p>Quemetco</p>	<p>Environmental Impact Report (EIR)</p>	<p>The Draft EIR was released for a 124-day public review and comment period from October 14, 2021 to February 15, 2022 and approximately 200 comment letters were received.</p> <p>Staff held two community meetings, on November 10, 2021 and February 9, 2022, which presented an overview of the proposed project, the CEQA process, detailed analysis of the potentially significant environmental topic areas, and the existing regulatory safeguards. Written comments submitted relative to the Draft EIR and oral comments made at the community meetings, along with responses will be included in the Final EIR which is currently being prepared by the consultant.</p> <p>After the Draft EIR public comment and review period closed, Quemetco submitted additional applications for other permit modifications which are also being evaluated by staff.</p>	<p>Trinity Consultants</p>
<p>Sunshine Canyon Landfill is proposing to modify its South Coast AQMD permits for its active landfill gas collection and control system to accommodate the increased collection of landfill gas. The proposed project will: 1) install two new low emission flares with two additional 300-horsepower electric blowers; and 2) increase the landfill gas flow limit of the existing flares.</p>	<p>Sunshine Canyon Landfill</p>	<p>Subsequent Environmental Impact Report (SEIR)</p>	<p>South Coast AQMD staff reviewed and provided comments on the preliminary air quality analysis, health risk assessment (HRA), and Preliminary Draft SEIR which are currently being addressed by the consultant.</p>	<p>SCS Engineers</p>
<p>Tesoro is proposing to modify its Title V permit to: 1) add gas oil as a commodity that can be stored in three of the six new crude oil storage tanks at the Carson Crude Terminal (previously assessed in the May 2017 Final EIR); and 2) drain, clean and decommission Reservoir 502, a 1.5 million barrel concrete lined, wooden-roof topped reservoir used to store gas oil.</p>	<p>Tesoro Refining & Marketing Company, LLC (Tesoro)</p>	<p>Addendum to the Final Environmental Impact Report (EIR) for the May 2017 Tesoro Los Angeles Refinery Integration and Compliance Project (LARIC)</p>	<p>The consultant provided a Preliminary Draft Addendum, which is undergoing South Coast AQMD staff review.</p>	<p>Environmental Audit, Inc.</p>

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BOARD MEETING DATE: September 1, 2023

AGENDA NO. 29

REPORT: Stationary Source Committee

SYNOPSIS: The Stationary Source Committee held a hybrid meeting on Friday, August 18, 2023. The following is a summary of the meeting.

RECOMMENDED ACTION:
Receive and file.

Mayor Larry McCallon, Chair
Stationary Source Committee

JA:cr

Committee Members

Present: Mayor Larry McCallon, Committee Chair
Supervisor Holly J. Mitchell, Committee Vice Chair
Vice Chair Michael A. Cacciotti
Chair Vanessa Delgado
Board Member Veronica Padilla-Campos
Councilmember José Luis Solache

Call to Order

Chair McCallon called the meeting to order at 11:15 a.m.

For additional information of the Stationary Source Committee meeting, please refer to the [Webcast](#).

Roll Call

INFORMATIONAL ITEMS:

1. Update on Proposed Amended Rule 1405 – Control of Ethylene Oxide Emissions from Sterilization and Related Operations

Kalam Cheung, Planning and Rules Manager/Planning, Rule Development and Implementation, presented updates to Proposed Amended Rule 1405 (PAR 1405) since the last update to Stationary Source Committee on June 16, 2023. Key remaining issues and staff responses were also presented. For additional details, please refer to the [Webcast](#) beginning at 3:13.

Dr. Cheung explained how the curtailment provision works based on Committee Chair McCallon's request for additional clarification. For additional details, please refer to the [Webcast](#) beginning at 5:56.

Board Member Padilla-Campos and Board Vice Chair Cacciotti asked for clarification on the exemption for the curtailment provision. Dr. Cheung responded that medical devices in shortage listed by the U.S. Food and Drug Administration (FDA) or other local, state, or federal agencies are exempt from curtailment provisions and that there are currently only 11 medical devices out of the millions of medical devices on U.S. FDA's shortage list. For additional details, please refer to the [Webcast](#) beginning at 9:39.

Committee Vice Chair Mitchell stated that Sterigenics expressed concern regarding their ability to meet PAR 1405 performance standards on a regular basis and also sought clarity regarding a recent Notice of Violation. Executive Officer Wayne Natri, Executive Officer, responded that staff would follow up with the details of the violation. For additional details, please refer to the [Webcast](#) beginning at 17:35.

Councilmember Solache expressed concern regarding performance standards, compliance timelines, their impact on the medical device supply chain, and costs associated with compliance. Dr. Cheung responded that multiple facilities in South Coast AQMD and in Illinois meet the proposed performance standards including Parter Medical Products in Carson. Dr. Cheung acknowledged that facilities may need to upgrade controls, and that compliance costs vary based on if upgrades are needed. Mr. Natri added that Parter shut their operation down to expedite installing upgraded engineering controls that are designed to meet the proposed performance standards. For additional details, please refer to the [Webcast](#) beginning at 19:21.

Vice Chair Cacciotti asked for clarification on the compliance timelines and comparison of sizes of sterilization facilities and reiterated that the compliance deadlines are two years and facilities have been on notice for months. Dr. Cheung explained the proposed compliance deadlines and regulatory requirements for large sterilization facilities. For additional details, please refer to the [Webcast](#) beginning at 25:34.

Committee Chair McCallon opened discussion for public comment. For additional details, please refer to the [Webcast](#) beginning at 26:54.

Joseph Hower, Ramboll, speaking on behalf of Sterigenics US, LLC expressed concern on the revised performance standards, curtailment provisions, and contributions of other sources to fenceline levels. Mr. Hower suggested delaying the Public hearing for 120 days and directing staff to work with industry to resolve concerns. Mr. Hower also asked that staff conduct a formal assessment of PAR 1405 on the impact on the medical supply chain. For additional details, please refer to the [Webcast](#) beginning at 27:25.

Ambar Rivera, Communities for a Better Environment expressed support for shorter compliance timelines and alternatives to ethylene oxide (EtO) sterilization. For additional details, please refer to the [Webcast](#) beginning at 30:36.

Harvey Eder, Public Solar Power Coalition, expressed thoughts on medical devices profit margins and impacts on medical device sterilization on public health. For additional details, please refer to the [Webcast](#) beginning at 33:01.

Bobby Patrick VI, Advanced Medical Technology Association, expressed concern on the feasibility of performance standards, the contribution of background EtO sources to fenceline levels, the impact of curtailment on medical supply chain, and the justification of requirements for warehouses. Mr. Patrick requested that PAR 1405 rulemaking be suspended until after U.S. EPA rulemaking and the OEHHA process to avoid confusion and conflict. For additional details, please refer to the [Webcast](#) beginning at 34:13.

Chair Delgado asked how Parter compared to other facilities. Jason Aspell, Deputy Executive Officer/Engineering and Permitting, responded that Parter has a lower throughput than the two Sterigenics facilities which may need additional layers of controls. For additional details, please refer to the [Webcast](#) beginning at 39:09.

Vice Chair Cacciotti asked staff to respond to a public comment regarding long timelines to restart after a failed source test. Dr. Cheung responded that the rule would prohibit operation with a failed source test, and that the Hearing Board is an existing mechanism if a facility would seek to continue to operate. Dr. Cheung further noted that a facility could resume operations after a failed source test with a passing source test. For additional details, please refer to the [Webcast](#) beginning at 40:38.

Committee Chair McCallon commented that ambient EtO levels are not above background levels beyond the fenceline. Dr. Cheung commented that monitoring results indicate EtO levels are near background 100 or 200 feet downwind of sterilization facilities. For additional details, please refer to the [Webcast](#) beginning at 44:09.

Committee Chair McCallon questioned the need for PAR 1405 and proposed to delay PAR 1405 until February 2024. Board Member Padilla-Campos expressed support for PAR 1405 and to be as aggressive as possible in rulemaking. Chair Delgado expressed reservations regarding PAR 1405 but expressed support to move forward, allowing for rulemaking to continue as opposed to suspending the process. Councilmember Solache expressed concern regarding the compliance timeline and feasibility of performance standards and expressed general support for PAR 1405. Committee Vice Chair Mitchell expressed concern regarding further delay beyond 2023 in light of the toxicity of EtO and past delays. Mr. Nastri confirmed that the

current schedule for PAR 1405 is to set hearing at the September Board meeting with consideration by the Board in October. For additional details, please refer to the [Webcast](#) beginning at 45:03.

Chair Delgado requested to check with the stakeholders and see if a delay is appropriate at Set Hearing. Vice Chair Mitchell requested staff to provide additional details regarding comparison of Parter to other large sterilization facilities. Vice Chair Cacciotti requested staff details on South Coast AQMD actions to assist sterilization facilities to comply and changes in EtO toxicity under consideration by OEHHA. Mr. Nastri summarized actions performed by various South Coast AQMD divisions to address EtO emissions and concerns with facility operators. Board Vice Chair Cacciotti requested that staff report back to the Board on Parter and the Sterigenics facilities activity over the next two months. For additional details, please refer to the [Webcast](#) beginning at 53:24.

2. Update on Proposed Amended Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities

Michael Krause, Assistant Deputy Executive Officer/Planning, Rule Development and Implementation, provided a summary on Proposed Amended Rule 1178. For additional details, please refer to the [Webcast](#) beginning at 1:08:45.

Board Member Padilla-Campos asked how the 15-year implementation schedule for doming was determined. Mr. Krause replied that the doming implementation schedule is based on technical feasibility and costs. He explained that emptying and cleaning a tank is expensive; however, facilities periodically empty and clean tanks to conduct inspections. He stated that aligning the doming schedule with the periodic inspection schedule allowed rules staff to remove cleaning and degassing costs making the proposal to dome all crude tanks cost-effective. For additional details, please refer to the [Webcast](#) beginning at 1:10:52.

Board Member Padilla-Campos asked about the feasibility of requiring a doming implementation schedule by 2035 and if that expedited schedule would require staff to include the cleaning and degassing costs associated with doming. Mr. Krause confirmed those costs would need to be considered if the implementation schedule was expedited. Board Member Padilla-Campos also stated that the EJ communities are asking about conducting a Fluxsense study every three to five years. Mr. Krause stated that the Fluxsense study can be done outside of the PAR 1178 rulemaking. For additional details, please refer to the [Webcast](#) beginning at 1:12:01.

Vice Chair Mitchell asked if only one facility will have the opportunity to extend their doming projects through 2041. Mr. Krause confirmed that was correct and stated that the facility will complete doming projects throughout the process and approximately four tanks will be domed within the extended schedule. Vice Chair Mitchell asked if all other facilities will complete their doming projects by 2038.

Mr. Krause confirmed that was correct. For additional details, please refer to the [Webcast](#) beginning at 1:12:50.

Chris Chavez, Coalition for Clean Air, stated that his organization, along with other groups, had signed a comment letter in support of PAR 1178 but he expressed his wish to see the rule implemented more quickly. He urged the Governing Board to consider the comments contained in their comment letter. For additional details, please refer to the [Webcast](#) beginning at 1:13:51.

Mr. Eder commented on solar power plants. For additional details, please refer to the [Webcast](#) beginning at 1:15:10.

Board Member Padilla-Campos asked if there were exceptions to doming. Mr. Krause stated that there is one exemption allowance for facilities with permitted true vapor pressure limits for their stored products. For additional details, please refer to the [Webcast](#) beginning at 1:16:58.

3. Update on Proposed Amended Rule 1111 – Reduction of NOx Emissions From Natural-Gas-Fired, Fan-Type Central Furnaces

Heather Farr, Planning and Rules Manager/Planning, Rule Development and Implementation, provided a summary of Proposed Amended Rule 1111. For additional details, please refer to the [Webcast](#) beginning at 1:17:29

David Stephens, Johnson Controls, Inc., commented in support of the current proposed amendment and suggested an exemption of mobile home furnaces from any future zero-emission amendments. For additional details, please refer to the [Webcast](#) beginning at 1:20:25.

Mr. Eder spoke in favor of a transition to solar power. For additional details, please refer to the [Webcast](#) beginning at 1:23:41.

Board Member Padilla-Campos requested a flyer or similar informational documents once the Clean Air Appliance Rebate Program incentive program is launched. For additional details, please refer to the [Webcast](#) beginning at 1:25:45.

4. Status Report on Reg. XIII – New Source Review

Jason Aspell, Deputy Executive Officer/Engineering and Permitting, gave a status report on Regulation XIII, New Source Review (NSR) Equivalency for Calendar Year 2021. There were no comments received from Committee members and from the public. For additional details, please refer to the [Webcast](#) beginning at 1:26:02.

5. Quarterly Permitting Update for Rule 1109.1 – Emissions of Oxides of Nitrogen from Petroleum Refineries and Related Operations

Due to time constraints, this item was deferred to the next Stationary Source Committee meeting. For additional details, please refer to the [Webcast](#) beginning at 1:30:34.

WRITTEN REPORTS:

6. 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.

7. Notice of Violation Penalty Summary

Board Vice Chair Cacciotti commented that he notices odors while pumping gas and asked for clarification on the number of 461 violations. Terrence Mann, Deputy Executive Officer/Compliance and Enforcement, replied that more than half the violations have to do with more housekeeping related issues. Mr. Aspell explained that vapor recovery does capture all gas emissions, and CARB has certified that 95% of it is captured. He suggested to file a complaint through our mobile app if odors are still being detected. For additional details, please refer to the [Webcast](#) beginning at 1:30:45.

OTHER MATTERS:

8. Other Business

There was no other business to report.

9. Public Comment Period

Mr. Eder urged that it’s time to look at models of public solar power because it's cost effective and deals with the environmental justice issue. For additional details, please refer to the [Webcast](#) beginning at 1:34:10.

10. Next Meeting Date

The next Stationary Source Committee meeting is scheduled for Friday, September 15, 2023 at 10:30 a.m.

Adjournment

The meeting was adjourned at 12:51 p.m.

Attachments

1. Attendance Record
2. 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
3. Notice of Violation Penalty Summary

ATTACHMENT 1

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT STATIONARY SOURCE COMMITTEE

Attendance –August 18, 2023

Councilmember Michael A. Cacciotti South Coast AQMD Board Member
Senator Vanessa Delgado (Ret)..... South Coast AQMD Board Member
Mayor Larry McCallon South Coast AQMD Board Member
Supervisor Holly J. Mitchell South Coast AQMD Board Member
Board Member Veronica Padilla-Campos South Coast AQMD Board Member
Councilmember José Luis Solache..... South Coast AQMD Board Member

William Kelly Board Consultant (Cacciotti)
Ron Ketcham Board Consultant (McCallon)
Loraine Lundquist..... Board Consultant (Mitchell)
Debra Mendelsohn..... Board Consultant (McCallon)
Uduak-Joe Ntuk..... Board Consultant (Kracov)
Marisela Santana..... Board Consultant (Solache)
Andrew Silva..... Board Consultant (Dawson)
Mark Taylor..... Board Consultant (Rodriguez)

Ambar Rivera Communities for a Better Environment
Mark Abramowitz..... Community Environmental Services
Jan Victor Andasan..... Communities for Environmental Justice
Chris Chavez Coalition for Clean Air
Harvey Eder..... Public Solar Power Coalition
Joseph Hower Ramboll
Bill LaMarr..... California Alliance of Small Business Associations
Dan McGivney SoCalGas
Bobby Patrick..... Advanced Medical Technology Association
David Stephens..... Johnson Controls Inc.
Scott Weaver Ramboll

Jason Aspell..... South Coast AQMD staff
Barbara Baird South Coast AQMD staff
Kalam Cheung South Coast AQMD staff
Heather Farr..... South Coast AQMD staff
Bayron Gilchrist South Coast AQMD staff
Sheri Hanizavareh..... South Coast AQMD staff
Mark Henninger..... South Coast AQMD staff
Michael Krause..... South Coast AQMD staff
Jason Low..... South Coast AQMD staff
Ian MacMillan South Coast AQMD staff
Terrence Mann..... South Coast AQMD staff
Ron Moskowitz South Coast AQMD staff
Wayne Nastri South Coast AQMD staff
Andrea Polidori South Coast AQMD staff
Sarah Rees South Coast AQMD staff
Catherine Rodriguez South Coast AQMD staff
Lisa Tanaka O'Malley South Coast AQMD staff
Mae Wang South Coast AQMD staff
Jillian Wong South Coast AQMD staff
Paul Wright South Coast AQMD staff
Victor Yip..... South Coast AQMD staff

August 2023 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. Key activities with U.S. EPA and CARB since the last report are summarized below.

- RECLAIM/NSR Working Group meeting was not held in August
- Next presentation to the Stationary Source Committee is scheduled for September 15, 2023
- Next meeting scheduled for October 12, 2023 to discuss the latest considerations for proposed amendments to Regulation XIII and XX

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

Settlement Penalty Report (06/01/2023 - 06/30/2023)

Total Penalties

Civil Settlement: \$390,183.00
Hearing Board Settlement: \$2,000.00
MSPAP Settlement: \$26,956.00
No Burn Day: \$150.00
Total Cash Settlements: \$419,289.00

Fiscal Year through 06/30/2023 Cash Total: \$6,299,893.62

Fac ID	Company Name	Rule Number	Settled Date	Init	Notice Nbrs	Total Settlement
Civil						
191040	365 DISPOSAL & RECYCLING	201, 203, 403, 1110.2, 1133, 1133.1, 1403	06/28/2023	KER	P67537, P67538, P67539, P67540, P67541, P67542, P67543, P67544, P67545, P67546, P67547, P67548, P67549, P67550, P67640, P69221, P69224, P69225, P69230, P69231, P74319, P74320, P74344, P74345, P74346, P74350, P74751, P74752, P74851, P74852, P74853, P74854, P74855, P74856, P74857, P74858, P74859, P74860, P74861, P74862, P74863, P74864	\$119,496.00
21593	COAST PLATING, INC.	201,203, 430, 1469, 1469.1	06/20/2023	SH	P69801, P69807, P69808, P69824, P69837, P73501	\$7,500.00
191728	DONGHAO LI	1403, 403	06/13/2023	RM	P69460, P70290, P70292, P70294, P70296	\$24,122.00
192589	HYE PRECISION	444, H&S 25205.5	06/15/2023	KER	P59489	\$2,928.00
129253	J & ED'S AUTOBODY	203, 1151	06/15/2023	SP	P65595	\$1,000.00
800312	LA CO HARBOR-UCLA MEDICAL CENTER	3002	06/29/2023	DH	P73804, P73874	\$1,500.00
171107	PHILLIPS 66 CO/LA REFINERY WILMINGTON PL	1118, 3002	06/06/2023	ND	P67767, P67768	\$83,461.50
132368	QG PRINTING II, LLC	3002	06/15/2023	JL	P68712, P68746	\$9,819.00
182980	SIGNAL HILL PETROLEUM, INC.	203, 463, 1173	06/21/2023	JJ	P66842, P73253, P73269, P73351	\$36,886.50
187885	SMITHFIELD PACKAGED MEATS, CORP.	2004, 3002	06/16/2023	KCM	P74627	\$1,800.00
51475	SO CAL EDISON CO	218, 218.1, 2004, 3001, 3002	06/20/2023	SH	P63899, P66174, P67116, P67119, P69538, P69912, P73928, P74109	\$50,000.00

Fac ID	Company Name	Rule Number	Settled Date	Init	Notice Nbrs	Total Settlement
174704	TESORO LOGISTICS-EAST HYNES TERMINAL	462, 463, 1142, 1149, 1178, 3002	06/27/2023	EC	P65135, P66515, P66517, P67704, P67910, P67922, P67923, P68209, P73201, P74054, P74504	\$9,500.00
174655	TESORO REFINING & MARKETING CO., LLC	221, 463, 1114, 1118, 1173, 1178, 1189, 3002	06/15/2023	KCM	P65123, P65618, P68967, P74056	\$12,500.00
181667	TORRANCE REFINING COMPANY, LLC	1173, 3002	06/07/2023	DH	P67959	\$1,750.00
181667	TORRANCE REFINING COMPANY, LLC	2004, 3002	06/23/2023	DH	P67956	\$23,420.00
172272	VAN NUYS COURTHOUSE EAST-JCC/AOC	201, 203, 222	06/15/2023	SH	P66835, P68869	\$4,500.00

Total Civil Settlements: \$390,183.00

Hearing Board

112573	FREUND BAKING COMPANY	1153.1	06/21/2023	JL	6226-1	\$2,000.00
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Total Hearing Board Settlements: \$2,000.00

MSPAP

192822	FELIX RAMOS	1403	06/14/2023	GV	P74214	\$4,261.00
159019	LA CANADA SHELL	461	06/23/2023	CL	P66041	\$1,424.00
162741	MICHAEL'S SHELL, KSM ENTERPRISES, INC.	461	06/16/2023	VA	P78676	\$1,344.00
136913	MORRELL'S ELECTRO PLATING, INC	1469	06/16/2023	VA	P69849	\$995.00
129249	MULTICHROME / MICROPLATE CO., INC.	1469	06/16/2023	CL	P74756	\$1,456.00
180338	PACIFIC AVIATION DEVELOPMENT, LLC	201, 203, 461	06/23/2023	CL	P62788	\$3,162.00
137050	PERFORMANCE CONSTRUCTION & PAINTING	40 CFR 61.145, 1403	06/23/2023	CL	P76108	\$2,218.00
171391	PRECISION HERMETIC TECHNOLOGY, INC.	203	06/23/2023	CL	P77601	\$1,171.00
160807	PRIMO POWDER COATING & SANDBLASTING	109, 203, 1151	06/16/2023	CL	P78551	\$4,855.00
1334	SOC-CO PLASTIC COATING CO.	3002	06/16/2023	VA	P63996	\$995.00
52742	STOROPACK, INC.	1146.1, 3002	06/09/2023	GV	P75304	\$793.00
28381	UPLAND CITY OF FLEET MAINTENANCE DIV	203, 461	06/13/2023	GV	P73167	\$1,882.00
63128	WEI CHUAN U.S.A., INC.	1415.1	06/23/2023	VA	P74914	\$1,021.00
193472	WIDE CORP-SAM COHEN	40 CFR 61.145, 1403	06/21/2023	GV	P74417	\$1,379.00

Total MSPAP Settlements: \$26,956.00

No-Burn Day

888888	Resident, Laguna Niguel	445	6/27/2023	JJ	2031491	\$50.00
888888	Resident, San Bernardino	445	6/27/2023	JJ	2030615	\$50.00
888888	Resident, Long Beach	445	6/27/2023	JJ	2030163	\$50.00

Total No-Burn Day Settlements: \$150.00

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

Settlement Penalty Report (07/01/2023 - 07/31/2023)

Total Penalties

Civil Settlement: \$539,956.00
Hearing Board Settlement: \$2,000.00
MSPAP Settlement: \$53,015.00
Total Cash Settlements: \$594,971.00

Fiscal Year through 07/31/2023 Cash Total: \$594,971.00

Fac ID	Company Name	Rule Number	Settled	Init	Notice Nbrs	Total Settlement
Civil						
183078	ANTHEM OIL POMONA	461, H&S 41960.2	07/14/2023	ND	P69628, P69633, P69641, P70744	\$7,250.00
137362	BHL INDUSTRIES	221, 403, 1166	07/19/2023	EC	P73403, P74310, P74312	\$3,300.00
157152	BOWERMAN POWER LFG, LLC	1110.2, 3002, 42402	07/19/2023	MR	P63080, P63090, P65511, P65525, P65543, P74707, P74721	\$453,645.00
190051	BRIDGE POINT LONG BEACH, LLC	221, 403, 1166, 2004	07/07/2023	EC	P73402, P74309, P74311, P74615	\$12,300.00
83102	LIGHT METALS, INC.	402, 2004, 2012, 2012 Appendix A, 3002, H&S 41700	07/20/2023	MR	P63461, P63690, P63774, P65861, P66855, P66871, P66890, P68358, P68359, P68360, P68361, P68362, P68364, P68365, P68372	\$21,000.00
141750	NRC ENVIRONMENTAL SERVICES, INC.	403, 1466	07/05/2023	RM	P70278, P70279, P70280	\$6,000.00
190100	OCEAN DEVELOPMENT, INC.	1403	07/05/2023	RM	P67500, P69730, P69731, P69737, P69738, P74230, P74231	\$3,400.00
149027	WARREN E & P, INC.	203, 463	07/13/2023	KER	P74507, P74510, P75660	\$25,761.00
162523	WOOD KOTE PRODUCTS, INC.	314	07/19/2023	SP	P65660, P66976	\$6,000.00
192992	ZAKIR HUSEIN MALEK	1403	07/19/2023	ND	P74220, P74221	\$1,300.00
Total Civil Settlements :						\$539,956.00

Fac ID	Company Name	Rule Number	Settled	Init	Notice Nbrs	Total Settlement
Hearing Board						
112573	FREUND BAKING COMPANY	1153.1	07/19/2023	JL	6226-1	\$2,000.00
Total Hearing Board Settlements : \$2,000.00						

MSPAP						
25087	AAA PLATING & INSPECTION, INC.	203, 1469	07/07/2023	VA	P77858	\$2,635.00
181770	ALISO CREEK SHELL	461	07/07/2023	CL	P78760	\$1,455.00
115618	BEAR OIL COMPANY, LLC.	461	07/14/2023	VA	P73118	\$1,493.00
153145	EBMI ENTERPRISES, INC.	203, 461	07/14/2023	CL	P78751	\$2,552.00
144474	GARNER ENGINEERING INC	203	07/07/2023	VA	P73272	\$937.00
11245	HOAG HOSPITAL	3002	07/07/2023	CL	P63994	\$921.00
168885	K & A FUELS, INC.	461	07/07/2023	CL	P66044	\$1,821.00
163720	LA BREA SINCLAIR	203, 461	07/07/2023	CL	P75711	\$1,445.00
194161	MOSES KARMI	1403	07/14/2023	CL	P74435	\$1,942.00
182690	NEW CINGULAR WIRELESS PCS, LLC	203, 1470	07/07/2023	CL	P75972	\$971.00
194573	PULTE HOMES	403	07/14/2023	VA	P74183	\$6,558.00
194573	PULTE HOMES	403	07/14/2023	VA	P75221	\$4,684.00
183670	RADC ENTERPRISES, INC.	203, 461	07/21/2023	CL	P77708	\$1,456.00
176677	SUKUT CONSTRUCTION, LLC	403	07/14/2023	VA	P63480	\$3,747.00
87470	TARGET STORES, NO. 291	203	07/21/2023	CL	P77906	\$1,021.00
82245	THREE D SERVICE	403	07/14/2023	CL	P75231	\$1,942.00
193927	TRENT A. JOHN	1403	07/21/2023	VA	P74431	\$4,396.00
136112	U.S. GAS	461	07/07/2023	CL	P78754	\$1,446.00
107668	WEBB'S CHEVRON/WEBB'S AUTO & TRUCK	203, 461	07/07/2023	CL	P74828	\$1,756.00
199102	WILSHIRE CONSTRUCTION, LP.	402, 403	07/07/2023	CL	P76538, P76545	\$9,837.00
Total MSPAP Settlements : \$53,015.00						

**SOUTH COAST AQMD'S RULES AND REGULATIONS
INDEX JUNE AND JULY 2023 PENALTY REPORTS**

REGULATION I - GENERAL PROVISIONS

Rule 109 Recordkeeping for Volatile Organic Compound Emissions

REGULATION II - PERMITS

Rule 201 Permit to Construct

Rule 203 Permit to Operate

Rule 218 Continuous Emission Monitoring

Rule 218.1 Continuous Emission Monitoring Performance Specifications

Rule 221 Plans

Rule 222 Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II.

REGULATION III - FEES

Rule 314 Fees for Architectural Coatings

REGULATION IV - PROHIBITIONS

Rule 402 Nuisance

Rule 403 Fugitive Dust (*Pertains to solid particulate matter emitted from man-made activities.*)

Rule 430 Breakdown Provisions

Rule 444 Open Fires

Rule 445 Wood Burning Devices

Rule 461 Gasoline Transfer and Dispensing

Rule 462 Organic Liquid Loading

Rule 463 Storage of Organic Liquids

REGULATION VIII - ORDERS FOR ABATEMENT

Rule 817 Effective Date of Decision

REGULATION XI - SOURCE SPECIFIC STANDARDS

Rule 1110.2 Emissions from Gaseous- and Liquid-Fueled Internal Combustion Engines

Rule 1114 Petroleum Refinery Coking Operations (MCS-01)

Rule 1118 Emissions from Refinery Flares

Rule 1133 Composting and Related Operations – General Administrative Requirements

Rule 1133.1 Chipping and Grinding Activities

Rule 1142 Marine Tank Vessel Operations

Rule 1146.1 Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators,

**SOUTH COAST AQMD'S RULES AND REGULATIONS INDEX
FOR JUNE AND JULY 2023 PENALTY REPORTS**

	and Process Heaters
Rule 1149	Storage Tank Degassing
Rule 1151	Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations
Rule 1153.1	Emissions of Oxides of Nitrogen from Commercial Food Ovens
Rule 1166	Volatile Organic Compound Emissions from Decontamination of Soil
Rule 1173	Fugitive Emissions of Volatile Organic Compounds
Rule 1178	Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities
Rule 1189	Emissions from Hydrogen Plant Process Vents

REGULATION XIV - TOXICS

Rule 1403	Asbestos Emissions from Demolition/Renovation Activities
Rule 1415.1	Reduction of Refrigerant Emissions from Stationary Refrigeration Systems
Rule 1466	Control of Particulate Emissions from Soils with Toxic Air Contaminants
Rule 1469	Hexavalent Chromium Emissions from Chrome Plating and Chromic Acid Anodizing Operations
Rule 1469.1.	Spraying Operations Using Coatings Containing Chromium
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
Rule 2012	Requirements for Monitoring, Reporting, and Recordkeeping for Oxides of Nitrogen (NOx) Emissions
Appendix A	
Rule 2012	Protocol for Monitoring, Reporting, and Recordkeeping for Oxides of Nitrogen (NOx) Emissions

REGULATION XXX- TITLE V PERMITS

Rule 3001	Applicability
Rule 3002	Requirements

CODE OF FEDERAL REGULATIONS

40 CFR 61.145	Standard for Demolition and Renovation
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CALIFORNIA HEALTH AND SAFETY CODE

25205.5	Hazardous Waste Fees - Facilities and Generator Fees
41700	Prohibited Discharges
41960.2	Gasoline Vapor Recovery
42402	Violation of Emission Limitations; Civil Penalty
42402.1	Negligent Emission of Air Contaminants; Civil Penalties

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BOARD MEETING DATE: September 1, 2023

AGENDA NO. 30

REPORT: Technology Committee

SYNOPSIS: The Technology Committee held a hybrid meeting on Friday, August 18, 2023. The following is a summary of the meeting.

RECOMMENDED ACTION:
Receive and file.

Carlos Rodriguez, Chair
Technology Committee

AK:psc

Committee Members

Present: Councilmember Carlos Rodriguez, Committee Chair
Supervisor Curt Hagman
Mayor Larry McCallon
Board Member Veronica Padilla-Campos

Absent: Supervisor Andrew Do
Mayor Patricia Lock Dawson

Call to Order

Committee Chair Carlos Rodriguez called the meeting to order at 1:00 p.m.

For additional details of the Technology Committee Meeting, please refer to the [Webcast](#).

ACTION ITEMS:

1. Issue RFP and Execute Contracts for Clean Technology Truck Loaner Program Within Four AB 617 Communities

Through a participatory budgeting process, four Assembly Bill 617 (AB 617) Community Steering Committees prioritized \$16,590,000 of Community Air Protection Program (CAP) funds for a Clean Technology Truck Loaner Program.

The four AB 617 communities include: 1) East Los Angeles, Boyle Heights, West Commerce; 2) San Bernardino, Muscoy; 3) Southeast Los Angeles; and 4) Wilmington, Carson, West Long Beach. The AB 617 Clean Technology Truck Loaner Program will allow truck owners and operators in these communities to rent zero-emission (ZE) trucks at a minimal cost. These actions are to: 1) issue an RFP to establish a list of eligible vendors to offer end-to-end short-term ZE truck rental services to owners and operators residing and operating in the four AB 617 communities; 2) authorize the Executive Officer to execute subsequent contracts with vendors to provide short-term rental services to eligible applicants participating in the AB 617 Clean Technology Truck Loaner Program in an amount not to exceed \$16,590,000 from the CAP AB 134 Fund (77); 3) reimburse the General Fund for administrative costs up to \$1,032,875 from the CAP AB 134 Fund (77) for staff time to implement the AB 617 Clean Technology Truck Loaner Program; and 4) transfer and appropriate up to \$4,000 from the administrative portion of CAP AB 134 Fund (77) into Technology Advancement's FY 2023-24 Budget, Services and Supplies Major Object, Public Notice and Advertisement account for administrative costs to implement the AB 617 Clean Technology Truck Loaner Program.

Supervisor Hagman inquired about the profits vendors could generate from the program. Staff clarified the target audience for the program is small truck operators with medium- to heavy-duty trucks. Staff also commented that it focuses on providing familiarity with zero-emission technology and infrastructure.

Board Member Padilla-Campos inquired about the duration of the loaner period and who will be providing zero-emission truck training. Staff commented that the loaner period for the program is up to one month, however, depending on availability, applicants can reapply and test out various zero-emission truck technologies. Staff also commented that the vendor will provide the training.

Mayor McCallon expressed interest in the participation and requested a program update when its available. Councilmember Rodriguez concurred and requested an update after the program opens. Staff agreed to provide an update and commented that truck drivers expressed interest at a previous community meeting.

Councilmember Rodriguez inquired about the ratio of hydrogen to battery electric truck availability, and the cost of purchasing a zero-emission truck compared to diesel. Staff commented that the ratio is unknown and is affected by infrastructure availability and stated that diesel trucks cost around \$150,000 while Class 8 zero-emission trucks cost around \$400,000.

Ranji George, public member, recommended that the program allocates 50 percent of the funds to hydrogen fuel technology.

Harvey Eder, Public Solar Power Coalition, commented on the equity of hydrogen fuel and battery technology. For additional details, please refer to the [Webcast](#) beginning at 2:50.

Moved by Hagman; seconded by McCallon; unanimously approved.

Ayes: Hagman, McCallon, Padilla-Campos, Rodriguez

Noes: None

Abstain: None

Absent: Do, Lock Dawson

2. Transfer and Appropriate Funds for Air Monitoring Programs and Issue Purchase Orders for Two Vehicles

South Coast AQMD previously received Federal grant awards from the Federal Government and U.S. EPA to continue implementing the Enhanced Particulate Monitoring and PAMS Programs, including funds for the purchase of new vehicles. However, additional funds are needed for the purchase of new zero-emission vehicles. These actions are to transfer funds up to \$91,766 from the Clean Fuels Program Fund to the Monitoring and Analysis Division FY 2023-24 Budget and authorize the Procurement Manager to issue solicitations and purchase orders for two zero-emission vehicles.

Board Member Padilla-Campos inquired about which vehicles are currently available on the State of California department of Government Services Fleet contract. Staff acknowledged the Chevrolet Silverado, and Ford Lightning are currently available.

Board Member Padilla-Campos and Mayor McCallon expressed interest in the Rivian R1T. For additional details, please refer to the [Webcast](#) beginning at 32:03.

Moved by Padilla-Campos; seconded by McCallon; unanimously approved.

Ayes: McCallon, Padilla-Campos, Rodriguez

Noes: None

Abstain: None

Absent: Do, Hagman, Lock Dawson

3. Approve Additional Funding for Residential Electric Vehicle Charging Incentive Program

Since 2015, the Residential EV Charging Incentive Program provides rebates to offset the cost of residential Level 2 (240V) EV chargers. Currently, the program provides up to a \$250 rebate, plus an additional \$250 for low-income residents within the South Coast AQMD four-county jurisdiction. Staff is proposing to revise

this program to focus solely on low-income residents while still providing the same \$500 rebate on a first come, first serve basis. This action is to request funding of up to \$200,000 from the Clean Fuels Program Fund (31) to continue the year-round Residential EV Charging Incentive Program.

Mayor McCallon asked how much of the rebates were provided to low-income households. Staff replied that approximately 23 percent of rebates issued have been used by low-income households. Mayor McCallon then commented that the rebate amount of \$500 may not be sufficient to cover the costs to upgrade electrical panels for households preparing for EV charging hardware. Staff replied that while the program focuses solely on the cost of EV charging hardware and the Replace Your Ride Program currently being implemented will offer up to \$2,000 for charging infrastructure and will include installation costs.

Supervisor Hagman expressed support for the program and its goals and commented that the program should be open for all to participate, instead of focusing on specific target populations. For additional details, please refer to the [Webcast](#) beginning at 37:42.

Moved by Padilla-Campos; seconded by McCallon; unanimously approved.

Ayes: Hagman, McCallon, Padilla-Campos, Rodriguez
Noes: None
Abstain: None
Absent: Do, Lock Dawson

INFORMATIONAL ITEM:

4. California Hydrogen Stations: Current State and Future Outlook

Gia Vacin, Deputy Director, ZEV Market Development Governor's Office of Business and Economic Development provided an overview of the recent hydrogen station development in California, challenges in expanding the refueling stations, and the reliability of existing stations' operations will be presented. In addition, a summary of the current state and Alliance for Renewable Clean Hydrogen Energy Systems efforts in developing and submitting the application to the DOE Hydrogen Hub solicitation.

Supervisor Hagman inquired about local and state governmental agencies' roles in advancing new technologies such as Hydrogen and the supporting infrastructure and how funding can be directed and further planned. Ms. Vacin emphasized the critical role of infrastructure. She also emphasized the necessity of public and private partnerships between governmental agencies to improve the reliability of the hydrogen refueling stations network.

Councilmember Rodriguez asked about the 200 stations goal by 2045 and recommendations for achieving this goal. Ms. Vacin stated that scaling up this technology is essential so that hydrogen technology becomes more cost competitive and to keep the equity between battery electric and fuel cell technologies. Councilmember Rodriguez also asked if California is awarded the Hydrogen Hub, can some funding be directed to light-duty stations. Ms. Vacin indicated that most of the Hydrogen Hub money is allocated to heavy-duty applications. Still, it is not off the table and can be supported by the echo system designed as a part of the hub.

Mr. George expressed appreciation for the support provided for hydrogen.

Mark Abramowitz, Community Environmental Services, emphasized the progress made over the years to advance hydrogen technology. He mentioned the adoption of fuel cell technology vehicles has been comparable to battery electric technologies despite the barriers and the need for infrastructure development. For additional details, please refer to the [Webcast](#) beginning at 1:25:02.

OTHER MATTERS:

5. Other Business

There was no other business to report.

6. Public Comment Period

Mr. Eder expressed health concerns regarding the effects of PM2.5 due to the heat and recent fires.

Mr. George expressed appreciation for the support of fuel cell projects and concerns regarding battery recycling. For additional details, please refer to the [Webcast](#) beginning at 1:15:19.

7. Next Meeting Date

The next regular Technology Committee meeting is scheduled for Friday, September 15, 2023, at noon.

Adjournment

The meeting adjourned at 2:30 p.m.

Attachment

Attendance Record

ATTACHMENT

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
TECHNOLOGY COMMITTEE MEETING
Attendance Record – August 18, 2023**

Supervisor Curt Hagman South Coast AQMD Board Member
Mayor Larry McCallon..... South Coast AQMD Board Member
Board Member Veronica Padilla-Campos..... South Coast AQMD Board Member
Councilmember Carlos Rodriguez..... South Coast AQMD Board Member

Debra Mendelsohn Board Consultant (McCallon)
Michael Miller..... Board Consultant (Hagman)
Andy Silva Board Consultant (Lock Dawson)
Mark Taylor Board Consultant (Rodriguez)
Amy Wong..... Board Consultant (Padilla-Campos)

Mark Abramowitz Community Environmental Services
Ramine Cromartie WSPA
Harvey Eder Public Solar Power Coalition
Amber Fong Public Member
Ranji George Public Member
Fred Minassian Public Member

Debra Ashby South Coast AQMD Staff
Rene Bermudez South Coast AQMD Staff
Cindy Bustillos..... South Coast AQMD Staff
Sam Cao South Coast AQMD Staff
Ryan Dover South Coast AQMD Staff
Daniel Garcia South Coast AQMD Staff
Ping Gui South Coast AQMD Staff
Maryam Hajbabaei South Coast AQMD Staff
Lauren Henninger..... South Coast AQMD Staff
Mark Henninger South Coast AQMD Staff
Ruby Laity South Coast AQMD Staff
Joseph Lopat South Coast AQMD Staff
Ron Moskowitz South Coast AQMD Staff
Wayne Nastri..... South Coast AQMD Staff
Vasileios Papapostolou..... South Coast AQMD Staff
Andrea Polidori South Coast AQMD Staff
Sarah Rees..... South Coast AQMD Staff
Penny Shaw Cedillo South Coast AQMD Staff
Walter Shen..... South Coast AQMD Staff
Yuh Jiun Tan..... South Coast AQMD Staff
Lisa Tanaka O’Malley..... South Coast AQMD Staff
Donna Vernon South Coast AQMD Staff
Mei Wang..... South Coast AQMD Staff
Paul Wright South Coast AQMD Staff

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BOARD MEETING DATE: September 1, 2023

AGENDA NO. 31

REPORT: Mobile Source Air Pollution Reduction Review Committee

SYNOPSIS: The Mobile Source Air Pollution Reduction Review Committee held a hybrid meeting on Thursday, August 17, 2023. The following is a summary of the meeting.

RECOMMENDED ACTION:
Receive and file.

Aaron Katzenstein
MSRC Technical Advisory Committee

AK:RG

FYs 2021-24 Work Program

FYs 2021-24 Publicly Accessible Goods Movement Zero-Emission Infrastructure Program

In August 2022, the MSRC approved a Request for Information (RFI) for Publicly Accessible Goods Movement Zero-Emission Infrastructure. The RFI has an initial targeted funding amount of \$50,000,000 with the purpose of identifying potential partners to assist the MSRC in deploying publicly accessible EVSE and hydrogen infrastructure within the South Coast AQMD region. The RFI closing date was November 30, 2022. Based on information submitted in response to the RFI, the MSRC is allowed to select one or more RFI respondents to enter into discussions and enter into agreements.

As part of approval of the FYs 2021-24 Work Program, the MSRC approved the following two initial RFI awards totaling \$14,679,171:

- a. A funding award to Prologis in an amount not to exceed \$11,679,171 to implement EVSE and hydrogen refueling at seven logistics facilities located within the geographical jurisdiction of the South Coast AQMD. South Coast AQMD will administer the Prologis project on behalf of the MSRC under the terms and conditions of the agreement executed between Prologis and South

Coast AQMD on behalf of the MSRC. The MSRC will augment the partners' contribution as an element of the FYs 2021-24 Work Programs; and

- b. A contract with the Los Angeles County Cleantech Incubator in an amount not to exceed \$3,000,000 to implement zero-emission truck refueling at two locations at the Port of Los Angeles.

Contracts Administrator's Report

The MSRC AB 2766 Contracts Administrator's report provides a written status report on all open contracts from FYs 2012-14 to present. The Contracts Administrator's Report for May 25 through July 26, 2023 is attached (*Attachment 1*).

Attachment

May 25 through July 26, 2023 Contracts Administrator's Report

MSRC Agenda Item No. 2

DATE: August 17, 2023

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 25 to July 26, 2023.

RECOMMENDATION: Receive and file report

WORK PROGRAM IMPACT: None

Contract Execution Status

2021-24 Work Program

On September 2, 2022, the SCAQMD Governing Board approved an award under the Major Event Center Transportation Program. This contract is executed.

On February 3, 2023, the SCAQMD Governing Board approved an award under the Transformative Transportation Strategies & Mobility Solutions Program. This contract is under development.

On June 2, 2023, the SCAQMD Governing Board approved six awards under the Microtransit Service RFP, for zero-emission shared mobility service. These contracts are under development.

Work Program Status

Contract Status Reports for Work Program years with open and/or pending contracts are attached.

FY 2011-12 Work Program Contracts

3 contracts are in "Open/Complete" status, having completed all obligations except operations.

FY 2011-12 Invoices Paid

No invoices were paid during this period.

FYs 2012-14 Work Program Contracts

5 contracts from this Work Program year are open, and 11 are in "Open/Complete" status.

FYs 2012-14 Invoices Paid

No invoices were paid during this period.

FYs 2014-16 Work Program Contracts

15 contracts from this Work Program year are open, and 13 are in “Open/Complete” status. 1 contract closed during this period: City of El Monte, Contract #ML16046 – Install EV Charging Infrastructure.

FYs 2014-16 Invoices Paid

No invoices were paid during this period.

FYs 2016-18 Work Program Contracts

56 contracts from this Work Program year are open, and 53 are in “Open/Complete” status.

FYs 2016-18 Invoices Paid

7 invoices totaling \$789,774.47 were paid during this period.

FYs 2018-21 Work Program Contracts

16 contracts from this Work Program year are open.

FYs 2018-21 Invoices Paid

11 invoices totaling \$3,291,117.46 were paid during this period.

FYs 2021-24 Work Program Contracts

1 contract from this Work Program year is open.

FYs 2021-24 Invoices Paid

No invoices were paid during this period.

Administrative Scope Changes

Two administrative scope changes were initiated during the period from May 25 to July 26, 2023:

- Green Fleet Systems, Contract #MS21014 (Deploy 5 Near-Zero Emission Trucks) – Reduce scope from 5 trucks to 3, and reduce value from \$500,000 to \$300,000
- San Bernardino County Transportation Authority, Contract #MS18065 (Implement Metrolink Discount) – Seven-month term extension

Attachments

- FY 2011-12 through FYs 2021-24 Contract Status Reports



AB2766 Discretionary Fund Program Invoices

May 25 to July 26, 2023

Contract Admin.	MSRC Chair	MSRC Liaison	Finance	Contract #	Contractor	Invoice #	Amount
<i>2016-2018 Work Program</i>							
7/20/2023	7/21/2023			MS18024	Riverside County Transportation Commission	03314	\$46,600.00
7/20/2023	7/21/2023			MS18024	Riverside County Transportation Commission	03242	\$43,000.00
6/1/2023	6/7/2023	6/14/2023	6/16/2023	ML18036	City of Indian Wells	19-57	\$50,000.00
6/2/2023	6/7/2023	6/13/2023		ML18144	City of Fontana Public Works	3BMIS 6269	\$269,090.00
6/22/2023	6/29/2023	7/14/2023		ML18060	County of Los Angeles Internal Services Depart	23MSRC001	\$125,562.65
6/15/2023	6/15/2023	6/20/2023		MS18023	Riverside County Transportation Commission	03313	\$23,206.12
5/31/2023	6/7/2023	6/13/2023		ML18059	City of Glendale Water & Power	1-Final	\$232,315.70

Total: \$789,774.47

<i>2018-2021 Work Program</i>							
6/13/2023	6/20/2023	6/21/2023	6/21/2023	MS21019	Volvo Financial Services	002	\$600,000.00
5/31/2023	6/7/2023	6/13/2023		MS21002	Better World Group Advisors	WG-MSRC3	\$4,012.25
6/6/2023	6/7/2023	6/16/2023	6/23/2023	MS21015	Premium Transportation Services, Inc.	17685	\$1,334,758.50
6/15/2023	6/15/2023	6/20/2023		MS21004	Los Angeles County MTA	800088518	\$326,899.00
6/7/2023	6/7/2023	6/13/2023		MS21006	Geographics	23-23286	\$33.00
7/21/2023	7/21/2023			MS21002	Better World Group Advisors	WG-MSRC3	\$6,326.10
6/20/2023	6/20/2023	6/21/2023		MS21002	Better World Group Advisors	WG-MSRC3	\$7,025.70
6/28/2023	6/29/2023	7/19/2023		MS21007	Penske Truck Leasing Co., L.P.	Final	\$957,812.40
6/28/2023	6/29/2023	7/19/2023		MS21005	Southern California Association of Governments	MS21005B-0	\$53,504.51
7/19/2023	7/21/2023			MS21006	Geographics	23-23316	\$373.00
6/7/2023	6/7/2023	6/13/2023		MS21006	Geographics	23-23285	\$373.00

Total: \$3,291,117.46

Total This Period: \$4,080,891.93



FYs 2011-12 Through 2021-24 AB2766 Contract Status Report

7/26/2023

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
<i>FY 2011-2012 Contracts</i>									
<i>Declined/Cancelled Contracts</i>									
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
ML12038	City of Long Beach Public Works				\$26,000.00	\$0.00	Electric Vehicle Charging Infrastructure	\$26,000.00	No
ML12040	City of Duarte				\$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
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
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
ML12090	City of Palm Springs	10/9/2015	10/8/2021	9/8/2025	\$21,163.00	\$0.00	EV Charging Infrastructure	\$21,163.00	No
MS12007	WestAir Gases & Equipment				\$100,000.00	\$0.00	Construct New Limited-Access CNG Station	\$100,000.00	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
MS12030	Complete Landscape Care, Inc.				\$150,000.00	\$0.00	Purchase 6 Medium-Heavy Duty Vehicles	\$150,000.00	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
MS12070	Valley Music Travel/CID Entertainme				\$99,000.00	\$0.00	Implement Shuttle Service to Coachella Mus	\$99,000.00	No
Total: 13									
<i>Closed Contracts</i>									
ML12013	City of Pasadena	10/19/2012	3/18/2015	9/18/2015	\$200,000.00	\$65,065.00	Electric Vehicle Charging Infrastructure	\$134,935.00	Yes
ML12014	City of Santa Ana - Public Works Ag	11/8/2013	8/7/2020	2/7/2022	\$338,000.00	\$255,977.50	9 H.D. Nat. Gas & LPG Trucks, EV Charging	\$82,022.50	Yes
ML12015	City of Fullerton	4/25/2013	11/24/2020	11/24/2021	\$40,000.00	\$40,000.00	HD CNG Vehicle, Expand CNG Station	\$0.00	Yes
ML12017	City of Los Angeles, Bureau of Sanit	6/26/2013	5/25/2020	11/25/2021	\$950,000.00	\$950,000.00	32 H.D. Nat. Gas Vehicles	\$0.00	Yes
ML12019	City of Palm Springs	9/6/2013	7/5/2015		\$38,000.00	\$16,837.00	EV Charging Infrastructure	\$21,163.00	Yes
ML12020	City of Los Angeles Dept of General	9/27/2012	3/26/2019	3/26/2020	\$450,000.00	\$450,000.00	15 H.D. Nat. Gas Vehicles	\$0.00	Yes
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
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
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
ML12039	City of Redlands	2/8/2013	10/7/2019		\$90,000.00	\$90,000.00	Three Heavy-Duty Nat. Gas Vehicles	\$0.00	Yes
ML12041	City of Anaheim Public Utilities Depa	4/4/2014	11/3/2015	11/3/2017	\$68,977.00	\$38,742.16	EV Charging Infrastructure	\$30,234.84	Yes
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
ML12043	City of Hemet	6/24/2013	9/23/2019	11/23/2021	\$30,000.00	\$30,000.00	One Heavy-Duty Nat. Gas Vehicles	\$0.00	Yes
ML12046	City of Irvine	8/11/2013	3/10/2021		\$30,000.00	\$30,000.00	One Heavy-Duty Nat. Gas Vehicle	\$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	Yes

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
ML12049	City of Rialto Public Works	7/14/2014	9/13/2015		\$30,432.00	\$3,265.29	EV Charging Infrastructure	\$27,166.71	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	Yes
ML12054	City of Palm Desert	9/30/2013	2/28/2015		\$77,385.00	\$77,385.00	EV Charging Infrastructure	\$0.00	Yes
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
ML12056	City of Cathedral City	3/26/2013	5/25/2014		\$25,000.00	\$25,000.00	Regional Street Sweeping Program	\$0.00	Yes
ML12057	City of Coachella	8/28/2013	8/27/2019	1/27/2022	\$57,456.00	\$57,456.00	Purchase One Nat. Gas H.D. Vehicle/Street	\$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
ML12091	City of Bellflower	10/5/2018	10/4/2019	6/30/2022	\$100,000.00	\$49,230.44	EV Charging Infrastructure	\$50,769.56	Yes
MS12001	Los Angeles County MTA	7/1/2012	4/30/2013		\$300,000.00	\$211,170.00	Clean Fuel Transit Service to Dodger Stadium	\$88,830.00	Yes
MS12002	Orange County Transportation Authority	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 Authority	7/20/2012	2/28/2013		\$234,669.00	\$167,665.12	Implement Metrolink Service to Angel Stadium	\$67,003.88	Yes
MS12004	USA Waste of California, Inc.	10/24/2013	11/23/2019		\$175,000.00	\$175,000.00	Construct New Limited-Access CNG Station	\$0.00	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
MS12008	Bonita Unified School District	7/12/2013	12/11/2019	4/11/2021	\$175,000.00	\$175,000.00	Construct New Limited-Access CNG Station	\$0.00	Yes
MS12009	Sysco Food Services of Los Angeles	1/7/2014	4/6/2020		\$150,000.00	\$150,000.00	Construct New Public-Access LNG Station	\$0.00	Yes
MS12010	Murrieta Valley Unified School District	4/5/2013	9/4/2019		\$242,786.00	\$242,786.00	Construct New Limited-Access CNG Station	\$0.00	Yes
MS12011	Southern California Gas Company	6/14/2013	6/13/2019	5/28/2021	\$150,000.00	\$150,000.00	Construct New Public-Access CNG Station -	\$0.00	Yes
MS12012	Rim of the World Unified School District	12/20/2012	5/19/2014		\$75,000.00	\$75,000.00	Vehicle Maintenance Facility Modifications	\$0.00	Yes
MS12024	Southern California Gas Company	6/13/2013	12/12/2019	11/12/2020	\$150,000.00	\$150,000.00	Construct New Public-Access CNG Station -	\$0.00	Yes
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
MS12031	Final Assembly, Inc.	11/2/2012	11/1/2018		\$50,000.00	\$32,446.00	Purchase 2 Medium-Heavy Duty Vehicles	\$17,554.00	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
MS12033	Mike Diamond/Phace Management	12/22/2012	12/21/2018	6/21/2021	\$148,900.00	\$148,900.00	Purchase 20 Medium-Heavy Duty Vehicles	\$0.00	Yes
MS12034	Ware Disposal Company, Inc.	11/2/2012	11/1/2018	5/1/2022	\$133,070.00	\$133,070.00	Purchase 8 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
MS12059	Orange County Transportation Authority	2/28/2013	12/27/2014		\$75,000.00	\$75,000.00	Maintenance Facilities Modifications	\$0.00	Yes
MS12060	City of Santa Monica	4/4/2014	8/3/2017	8/3/2019	\$500,000.00	\$434,202.57	Implement Westside Bikeshare Program	\$65,797.43	Yes
MS12061	Orange County Transportation Authority	3/14/2014	3/13/2017		\$224,000.00	\$114,240.00	Transit-Oriented Bicycle Sharing Program	\$109,760.00	Yes
MS12062	Fraser Communications	12/7/2012	5/31/2014		\$998,669.00	\$989,218.49	Develop & Implement "Rideshare Thursday"	\$9,450.51	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
MS12064	Anaheim Transportation Network	3/26/2013	12/31/2014		\$127,296.00	\$56,443.92	Implement Anaheim Circulator Service	\$70,852.08	Yes

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
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
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
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
MS12073	FirstCNG, LLC	7/27/2013	12/26/2019		\$150,000.00	\$150,000.00	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	Yes
MS12075	CR&R Incorporated	7/27/2013	1/26/2021	1/26/2022	\$100,000.00	\$100,000.00	Expansion of Existing CNG Infrastructure	\$0.00	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
MS12078	Penske Truck Leasing Co., L.P.	1/7/2014	1/6/2016		\$75,000.00	\$73,107.00	Maintenance Facility Modifications - Vernon	\$1,893.00	Yes
MS12080	City of Pasadena	11/8/2013	8/7/2020	2/7/2022	\$225,000.00	\$225,000.00	Expansion of Existing CNG Infrastructure	\$0.00	Yes
MS12081	Penske Truck Leasing Co., L.P.	1/7/2014	1/6/2016		\$75,000.00	\$75,000.00	Maintenance Facility Modifications - Santa A	\$0.00	Yes
MS12082	City of Los Angeles, Bureau of Sanit	11/20/2013	2/19/2021	2/19/2023	\$175,000.00	\$175,000.00	Install New CNG Infrastructure	\$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
MS12086	SuperShuttle International, Inc.	3/26/2013	3/25/2019		\$225,000.00	\$225,000.00	Purchase 23 Medium-Heavy Duty Vehicles	\$0.00	Yes
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	\$18,496.50	Implement Rideshare Incentives Program	\$106,503.50	Yes
MS12089	Riverside County Transportation Co	10/18/2013	9/17/2015		\$249,136.00	\$105,747.48	Implement Rideshare Incentives Program	\$143,388.52	Yes
MS12Hom	Mansfield Gas Equipment Systems				\$296,000.00	\$0.00	Home Refueling Apparatus Incentive Progra	\$296,000.00	Yes

Total: 72

Closed/Incomplete Contracts

ML12051	City of Bellflower	2/7/2014	2/6/2016	5/6/2018	\$100,000.00	\$0.00	EV Charging 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
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
MS12084	Airport Mobil Inc.	12/6/2013	5/5/2020		\$150,000.00	\$0.00	Install New CNG Infrastructure	\$150,000.00	No

Total: 4

Open/Complete Contracts

ML12018	City of West Covina	10/18/2013	10/17/2020	8/17/2023	\$300,000.00	\$300,000.00	Expansion of Existing CNG Station	\$0.00	Yes
ML12045	City of Baldwin Park DPW	2/14/2014	12/13/2020	12/13/2026	\$400,000.00	\$400,000.00	Install New CNG Station	\$0.00	Yes
MS12083	Brea Olinda Unified School District	7/30/2015	2/29/2024		\$59,454.00	\$59,454.00	Install New CNG Infrastructure	\$0.00	Yes

Total: 3

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
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FY 2012-2014 Contracts

Open Contracts

ML14021	Riverside County Regional Park and	7/24/2014	12/23/2016	9/30/2024	\$250,000.00	\$0.00	Bicycle Trail Improvements	\$250,000.00	No
ML14027	County of Los Angeles Dept of Publi	10/2/2015	5/1/2023	8/1/2028	\$492,000.00	\$0.00	Construct New CNG Station in Canyon Coun	\$492,000.00	No
MS14057	Los Angeles County MTA	11/7/2014	10/6/2019	10/6/2023	\$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	7/4/2023	\$1,250,000.00	\$899,594.08	Implement Various Signal Synchronization P	\$350,405.92	No
MS14072	San Bernardino County Transportatio	3/27/2015	3/26/2018	3/26/2024	\$1,237,500.00	\$1,148,376.17	Implement Various Signal Synchronization P	\$89,123.83	No

Total: 5

Declined/Cancelled Contracts

ML14063	City of Hawthorne				\$32,000.00	\$0.00	Expansion of Existng CNG Infrastructure	\$32,000.00	No
ML14068	City of South Pasadena	9/12/2014	10/11/2015	1/11/2020	\$10,183.00	\$0.00	Electric Vehicle Charging Infrastructure	\$10,183.00	No
ML14069	City of Beaumont	3/3/2017	3/2/2025		\$200,000.00	\$0.00	Construct New CNG Infrastructure	\$200,000.00	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
MS14038	Penske Truck Leasing Co., L.P.				\$75,000.00	\$0.00	Vehicle Maint. Fac. Modifications - Fontana	\$75,000.00	No
MS14043	City of Anaheim				\$175,000.00	\$0.00	Expansion of Existing CNG Station	\$175,000.00	No
MS14078	American Honda Motor Co., Inc.	9/4/2015	8/3/2022		\$150,000.00	\$0.00	New Public Access CNG Station	\$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
MS14091	Serv-Wel Disposal				\$100,000.00	\$0.00	New Limited-Access CNG Infrastructure	\$100,000.00	No

Total: 11

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
ML14012	City of Santa Ana - Public Works Ag	2/13/2015	10/12/2021	10/12/2022	\$41,220.00	\$41,220.00	EV Charging and 1 H.D. CNG Vehicle	\$0.00	Yes
ML14014	City of Torrance	9/5/2014	12/4/2019		\$56,000.00	\$56,000.00	EV Charging Infrastructure	\$0.00	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
ML14016	City of Anaheim	4/3/2015	9/2/2021		\$380,000.00	\$380,000.00	Purchase 2 H.D. Vehicles, Expansion of Exi	\$0.00	Yes
ML14019	City of Corona Public Works	12/5/2014	6/4/2020	3/6/2023	\$111,518.00	\$111,517.18	EV Charging, Bicycle Racks, Bicycle Locker	\$0.82	Yes
ML14022	County of Los Angeles Department o	10/2/2015	5/1/2022		\$270,000.00	\$270,000.00	Purchase 9 H.D. Nat. Gas Vehicles	\$0.00	Yes
ML14023	County of Los Angeles Department o	10/2/2015	9/1/2017	3/1/2021	\$230,000.00	\$230,000.00	Maintenance Fac. Modifications-Westcheste	\$0.00	Yes
ML14024	County of Los Angeles Department o	10/2/2015	9/1/2017	9/1/2021	\$230,000.00	\$230,000.00	Maintenance Fac. Modifications-Baldwin Par	\$0.00	Yes
ML14028	City of Fullerton	9/5/2014	1/4/2022		\$126,950.00	\$126,950.00	Expansion of Exisiting CNG Infrastructure	\$0.00	Yes
ML14029	City of Irvine	7/11/2014	6/10/2017		\$90,500.00	\$71,056.78	Bicycle Trail Improvements	\$19,443.22	Yes
ML14030	County of Los Angeles Internal Servi	1/9/2015	3/8/2018	7/30/2021	\$425,000.00	\$216,898.02	Bicycle Racks, Outreach & Education	\$208,101.98	Yes
ML14031	Riverside County Waste Manageme	6/13/2014	12/12/2020		\$90,000.00	\$90,000.00	Purchase 3 H.D. CNG Vehicles	\$0.00	Yes

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
ML14032	City of Rancho Cucamonga	1/9/2015	1/8/2022		\$113,990.00	\$104,350.63	Expansion of Existing CNG Infras., Bicycle L	\$9,639.37	Yes
ML14033	City of Irvine	7/11/2014	2/10/2021	2/10/2022	\$60,000.00	\$60,000.00	Purchase 2 H.D. CNG Vehicles	\$0.00	Yes
ML14034	City of Lake Elsinore	9/5/2014	5/4/2021		\$56,700.00	\$56,700.00	EV Charging Stations	\$0.00	Yes
ML14049	City of Moreno Valley	7/11/2014	3/10/2021		\$105,000.00	\$101,976.09	One HD Nat Gas Vehicle, EV Charging, Bicy	\$3,023.91	Yes
ML14051	City of Brea	9/5/2014	1/4/2017	7/4/2018	\$450,000.00	\$450,000.00	Installation of Bicycle Trail	\$0.00	Yes
ML14054	City of Torrance	11/14/2014	4/13/2017	7/13/2017	\$350,000.00	\$319,908.80	Upgrade Maintenance Facility	\$30,091.20	Yes
ML14055	City of Highland	10/10/2014	3/9/2018	3/9/2019	\$500,000.00	\$489,385.24	Bicycle Lanes and Outreach	\$10,614.76	Yes
ML14056	City of Redlands	9/5/2014	5/4/2016	5/4/2018	\$125,000.00	\$125,000.00	Bicycle Lanes	\$0.00	Yes
ML14061	City of La Habra	3/11/2016	3/10/2022		\$41,600.00	\$41,270.49	Purchase Two Heavy-Duty Nat. Gas Vehicle	\$329.51	Yes
ML14064	City of Claremont	7/11/2014	7/10/2020	1/10/2021	\$60,000.00	\$60,000.00	Purchase Two Heavy-Duty Nat. Gas Vehicle	\$0.00	Yes
ML14065	City of Orange	9/5/2014	8/4/2015		\$10,000.00	\$10,000.00	Electric Vehicle Charging Infrastructure	\$0.00	Yes
ML14070	City of Rancho Cucamonga	9/3/2016	12/2/2018		\$365,245.00	\$326,922.25	Bicycle Trail Improvements	\$38,322.75	Yes
ML14071	City of Manhattan Beach	1/9/2015	11/8/2018		\$22,485.00	\$22,485.00	Electric Vehicle Charging Infrastructure	\$0.00	Yes
ML14072	City of Cathedral City	8/13/2014	1/12/2021	7/12/2022	\$41,000.00	\$41,000.00	Install Bicycle Racks & Implement Bicycle E	\$0.00	Yes
ML14094	City of Yucaipa	6/9/2017	6/8/2018		\$84,795.00	\$84,795.00	Installation of Bicycle Lanes	\$0.00	Yes
ML14095	City of South Pasadena	1/10/2019	7/9/2019		\$142,096.00	\$134,182.09	Bicycle Trail Improvements	\$7,913.91	Yes
ML14096	County of Los Angeles Dept of Pub	5/3/2019	12/2/2019	3/2/2020	\$74,186.00	\$74,186.00	San Gabriel BikeTrail Underpass Improveme	\$0.00	Yes
ML14097	County of Los Angeles Internal Servi	9/6/2019	9/5/2020	9/5/2021	\$104,400.00	\$104,400.00	Electric Vehicle Charging Infrastructure	\$0.00	Yes
MS14001	Los Angeles County MTA	3/6/2015	4/30/2015		\$1,216,637.00	\$1,199,512.68	Clean Fuel Transit Service to Dodger Stadiu	\$17,124.32	Yes
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	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
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	Yes
MS14005	Transit Systems Unlimited, Inc.	4/11/2014	2/28/2016		\$515,200.00	\$511,520.00	Provide Expanded Shuttle Service to Hollyw	\$3,680.00	Yes
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	Yes
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	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 Progra	\$0.00	Yes
MS14037	Penske Truck Leasing Co., L.P.	4/7/2017	6/6/2020		\$75,000.00	\$75,000.00	Vehicle Maint. Fac. Modifications - Carson	\$0.00	Yes
MS14039	Waste Management Collection and	7/10/2015	4/9/2016		\$75,000.00	\$75,000.00	Vehicle Maint. Fac. Modifications - Irvine	\$0.00	Yes
MS14040	Waste Management Collection and	7/10/2015	4/9/2016		\$75,000.00	\$75,000.00	Vehicle Maint. Fac. Modifications - Santa An	\$0.00	Yes
MS14041	USA Waste of California, Inc.	9/4/2015	10/3/2021		\$175,000.00	\$175,000.00	Limited-Access CNG Station, Vehicle Maint.	\$0.00	Yes
MS14042	Grand Central Recycling & Transfer	6/6/2014	9/5/2021		\$150,000.00	\$150,000.00	Expansion of Existing CNG Station	\$0.00	Yes
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
MS14045	TIMCO CNG Fund I, LLC	6/6/2014	12/5/2020		\$150,000.00	\$150,000.00	New Public-Access CNG Station in Inglewoo	\$0.00	Yes
MS14046	Ontario CNG Station Inc.	5/15/2014	5/14/2020	11/14/2021	\$150,000.00	\$150,000.00	Expansion of Existing CNG Infrastructure	\$0.00	Yes
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 Progra	\$93,000.00	Yes
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	Yes

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
MS14053	Upland Unified School District	1/9/2015	7/8/2021		\$175,000.00	\$175,000.00	Expansion of Existing CNG Infrastructure	\$0.00	Yes
MS14058	Orange County Transportation Autho	11/7/2014	4/6/2016	4/6/2017	\$1,250,000.00	\$1,250,000.00	Implement Various Signal Synchronization P	\$0.00	Yes
MS14073	Anaheim Transportation Network	1/9/2015	4/30/2017		\$221,312.00	\$221,312.00	Anaheim Resort Circulator Service	\$0.00	Yes
MS14074	Midway City Sanitary District	1/9/2015	3/8/2021		\$250,000.00	\$250,000.00	Limited-Access CNG Station & Facility Modif	\$0.00	Yes
MS14077	County Sanitation Districts of L.A. Co	3/6/2015	5/5/2021		\$175,000.00	\$175,000.00	New Limited Access CNG Station	\$0.00	Yes
MS14080	CR&R Incorporated	6/1/2015	8/31/2021	8/31/2022	\$200,000.00	\$200,000.00	Expansion of Existing CNG Infrastructure/Ma	\$0.00	Yes
MS14081	CR&R Incorporated	6/1/2015	5/30/2021		\$175,000.00	\$100,000.00	Expansion of Existing CNG Infrastructure/Ma	\$75,000.00	Yes
MS14084	US Air Conditioning Distributors	5/7/2015	9/6/2021		\$100,000.00	\$100,000.00	Expansion of Existing CNG Infrastructure	\$0.00	Yes
MS14087	Orange County Transportation Autho	8/14/2015	4/30/2016		\$239,645.00	\$195,377.88	Implement Special Metrolink Service to Ang	\$44,267.12	Yes
MS14088	Southern California Regional Rail Au	5/7/2015	9/30/2015		\$79,660.00	\$66,351.44	Special Metrolink Service to Autoclub Speed	\$13,308.56	Yes
MS14089	Top Shelf Consulting, LLC	1/18/2017	8/4/2016	3/31/2017	\$200,000.00	\$200,000.00	Enhanced Fleet Modernization Program	\$0.00	Yes
MS14090	City of Monterey Park	5/7/2015	5/6/2021		\$225,000.00	\$225,000.00	Expansion of Existing CNG Infrastructure	\$0.00	Yes

Total: 63

Closed/Incomplete Contracts

ML14020	County of Los Angeles Dept of Pub	8/13/2014	1/12/2018		\$150,000.00	\$0.00	San Gabriel BikeTrail Underpass Improveme	\$150,000.00	No
ML14050	City of Yucaipa	7/11/2014	9/10/2015	7/1/2016	\$84,795.00	\$0.00	Installation of Bicycle Lanes	\$84,795.00	No
ML14060	County of Los Angeles Internal Servi	10/6/2017	1/5/2019		\$104,400.00	\$0.00	Electric Vehicle Charging Infrastructure	\$104,400.00	No
ML14066	City of South Pasadena	9/12/2014	7/11/2016	2/11/2018	\$142,096.00	\$0.00	Bicycle Trail Improvements	\$142,096.00	No
ML14093	County of Los Angeles Dept of Pub	8/14/2015	1/13/2019		\$150,000.00	\$0.00	San Gabriel BikeTrail Underpass Improveme	\$150,000.00	No
MS14092	West Covina Unified School District	9/3/2016	12/2/2022		\$124,000.00	\$0.00	Expansion of Existing CNG Infrastructure	\$124,000.00	No

Total: 6

Open/Complete Contracts

ML14013	City of Los Angeles, Bureau of Sanit	10/7/2016	2/6/2025		\$400,000.00	\$400,000.00	Purchase 14 H.D. Nat. Gas Vehicles	\$0.00	Yes
ML14018	City of Los Angeles Dept of General	3/6/2015	9/5/2021	2/5/2026	\$810,000.00	\$810,000.00	Purchase 27 H.D. Nat. Gas Vehicles	\$0.00	Yes
ML14025	County of Los Angeles Dept of Publi	10/2/2015	7/1/2018	7/1/2024	\$300,000.00	\$300,000.00	Construct New CNG Station in Malibu	\$0.00	Yes
ML14026	County of Los Angeles Dept of Publi	10/2/2015	5/1/2023	5/1/2024	\$300,000.00	\$300,000.00	Construct New CNG Station in Castaic	\$0.00	Yes
ML14062	City of San Fernando	3/27/2015	5/26/2021	10/31/2023	\$325,679.00	\$325,679.00	Expand Existing CNG Fueling Station	\$0.00	Yes
ML14067	City of Duarte	12/4/2015	1/3/2023	6/3/2024	\$60,000.00	\$60,000.00	Purchase Two Electric Buses	\$0.00	Yes
MS14075	Fullerton Joint Union High School Di	7/22/2016	11/21/2023		\$300,000.00	\$293,442.00	Expansion of Existing CNG Infrastructure/Ma	\$6,558.00	Yes
MS14076	Rialto Unified School District	6/17/2015	2/16/2022	6/25/2023	\$225,000.00	\$225,000.00	New Public Access CNG Station	\$0.00	Yes
MS14079	Waste Resources, Inc.	9/14/2016	8/13/2022	10/13/2024	\$100,000.00	\$100,000.00	New Limited Access CNG Station	\$0.00	Yes
MS14082	Grand Central Recycling & Transfer	12/4/2015	3/3/2023	3/3/2024	\$150,000.00	\$150,000.00	Construct New Public Access CNG Station	\$0.00	Yes
MS14083	Hacienda La Puente Unified School	7/10/2015	3/9/2022	6/9/2023	\$175,000.00	\$175,000.00	New Limited Access CNG Station	\$0.00	Yes

Total: 11

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

ML16006	City of Cathedral City	4/27/2016	4/26/2022	4/26/2023	\$25,000.00	\$25,000.00	Bicycle Outreach	\$0.00	No
ML16017	City of Long Beach	2/5/2016	8/4/2023	5/4/2029	\$1,445,400.00	\$1,415,400.00	Purchase 50 Medium-Duty, 17 H.D. Nat. Ga	\$30,000.00	No
ML16022	Los Angeles Department of Water an	5/5/2017	3/4/2024	6/4/2028	\$240,000.00	\$0.00	Purchase 8 H.D. Nat. Gas Vehicles	\$240,000.00	No
ML16025	City of South Pasadena	6/22/2016	4/21/2023	2/21/2025	\$130,000.00	\$0.00	Expand Existing CNG Infrastructure	\$130,000.00	No
ML16039	City of Torrance Transit Department	1/6/2017	9/5/2022	9/5/2024	\$32,000.00	\$0.00	Install Eight Level II EV Chargers	\$32,000.00	No
ML16040	City of Eastvale	1/6/2017	7/5/2022	11/5/2026	\$66,409.00	\$53,908.85	Install EV Charging Infrastructure	\$12,500.15	No
ML16047	City of Fontana	1/6/2017	8/5/2019	8/5/2024	\$500,000.00	\$0.00	Enhance an Existing Class 1 Bikeway	\$500,000.00	No
ML16057	City of Yucaipa	4/27/2016	1/26/2019	1/26/2024	\$380,000.00	\$0.00	Implement a "Complete Streets" Pedestrian	\$380,000.00	No
ML16075	City of San Fernando	10/27/2016	2/26/2019	8/26/2024	\$354,000.00	\$0.00	Install a Class 1 Bikeway	\$354,000.00	No
ML16077	City of Rialto	5/3/2018	10/2/2021	2/2/2026	\$463,216.00	\$218,708.00	Pedestrian Access Improvements, Bicycle L	\$244,508.00	No
MS16094	Riverside County Transportation Co	1/25/2017	1/24/2022	2/24/2024	\$1,909,241.00	\$0.00	MetroLink First Mile/Last Mile Mobility Strate	\$1,909,241.00	No
MS16110	City of Riverside	10/6/2017	2/5/2025	10/5/2026	\$270,000.00	\$71,250.00	Expansion of Existing CNG Station and Main	\$198,750.00	No
MS16120	Omnitrans	4/7/2017	5/6/2025		\$945,000.00	\$870,000.00	Repower 63 Existing Buses	\$75,000.00	No
MS16121	Long Beach Transit	11/3/2017	4/2/2024	11/30/2028	\$600,000.00	\$570,000.00	Repower 39 and Purchase 1 New Transit Bu	\$30,000.00	No
MS16123	Orange County Transportation Autho	12/7/2018	11/6/2023		\$91,760.00	\$0.00	Install La Habra Union Pacific Bikeway	\$91,760.00	No

Total: 15

Declined/Cancelled Contracts

ML16014	City of Dana Point				\$153,818.00	\$0.00	Extend an Existing Class 1 Bikeway	\$153,818.00	No
ML16065	City of Temple City				\$500,000.00	\$0.00	Implement a "Complete Streets" Pedestrian	\$500,000.00	No
ML16067	City of South El Monte				\$73,329.00	\$0.00	Implement an "Open Streets" Event	\$73,329.00	No
ML16074	City of La Verne	7/22/2016	1/21/2023		\$365,000.00	\$0.00	Install CNG Fueling Station	\$365,000.00	No
MS16043	LBA Realty Company LLC				\$100,000.00	\$0.00	Install Limited-Access CNG Station	\$100,000.00	No
MS16080	Riverside County Transportation Co				\$1,200,000.00	\$0.00	Passenger Rail Service for Coachella and St	\$1,200,000.00	No
MS16098	Long Beach Transit				\$198,957.00	\$0.00	Provide Special Bus Service to Stub Hub Ce	\$198,957.00	No
MS16104	City of Perris				\$175,000.00	\$0.00	Expansion of Existing CNG Infrastructure	\$175,000.00	No
MS16106	City of Lawndale	3/1/2019	11/30/2025		\$175,000.00	\$0.00	Expansion of Existing CNG Infrastructure	\$175,000.00	No
MS16107	Athens Services				\$100,000.00	\$0.00	Construct a Limited-Access CNG Station	\$100,000.00	No
MS16108	VNG 5703 Gage Avenue, LLC				\$150,000.00	\$0.00	Construct Public-Access CNG Station in Bell	\$150,000.00	No
MS16109	Sanitation Districts of Los Angeles C				\$275,000.00	\$0.00	Expansion of an Existing L/CNG Station	\$275,000.00	No
MS16111	VNG 925 Lakeview Avenue, LLC				\$150,000.00	\$0.00	Construct Public Access CNG Station in Pla	\$150,000.00	No

Total: 13

Closed Contracts

ML16007	City of Culver City Transportation De	10/6/2015	4/5/2023		\$246,000.00	\$246,000.00	Purchase 7 H.D. Nat. Gas Vehicles, EV Cha	\$0.00	Yes
ML16009	City of Fountain Valley	10/6/2015	2/5/2018	5/5/2019	\$46,100.00	\$46,100.00	Install EV Charging Infrastructure	\$0.00	Yes

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
ML16011	City of Claremont	10/6/2015	6/5/2022		\$90,000.00	\$90,000.00	Purchase 3 Heavy-Duty Nat. Gas Vehicles	\$0.00	Yes
ML16012	City of Carson	1/15/2016	10/14/2022		\$60,000.00	\$60,000.00	Purchase 2 Heavy-Duty Nat. Gas Vehicles	\$0.00	Yes
ML16015	City of Yorba Linda	3/4/2016	11/3/2017		\$85,000.00	\$85,000.00	Install Bicycle Lanes	\$0.00	Yes
ML16016	City of Los Angeles Dept of General	2/5/2016	12/4/2022		\$630,000.00	\$630,000.00	Purchase 21 Heavy-Duty Nat. Gas Vehicles	\$0.00	Yes
ML16018	City of Hermosa Beach	10/7/2016	1/6/2023		\$29,520.00	\$23,768.44	Purchase 2 M.D. Nat. Gas Vehicles, Bicycle	\$5,751.56	Yes
ML16019	City of Los Angeles, Dept of General	1/25/2017	3/24/2023		\$102,955.00	\$102,955.00	Install EV Charging Infrastructure	\$0.00	Yes
ML16020	City of Pomona	4/1/2016	2/1/2018	8/1/2018	\$440,000.00	\$440,000.00	Install Road Surface Bicycle Detection System	\$0.00	Yes
ML16023	City of Banning	12/11/2015	12/10/2021		\$30,000.00	\$30,000.00	Purchase 1 H.D. Nat. Gas Vehicle	\$0.00	Yes
ML16024	City of Azusa	4/27/2016	2/26/2022		\$30,000.00	\$30,000.00	Purchase 1 H.D. Nat. Gas Vehicle	\$0.00	Yes
ML16026	City of Downey	5/6/2016	9/5/2017		\$40,000.00	\$40,000.00	Install EV Charging Infrastructure	\$0.00	Yes
ML16027	City of Whittier	1/8/2016	11/7/2022		\$30,000.00	\$30,000.00	Purchase 1 H.D. Nat. Gas Vehicle	\$0.00	Yes
ML16028	City of Azusa	9/9/2016	4/8/2018		\$25,000.00	\$25,000.00	Enhance Existing Class 1 Bikeway	\$0.00	Yes
ML16031	City of Cathedral City	12/19/2015	2/18/2017		\$25,000.00	\$25,000.00	Street Sweeping in Coachella Valley	\$0.00	Yes
ML16032	City of Azusa	9/9/2016	4/8/2019	4/8/2021	\$474,925.00	\$474,925.00	Implement a "Complete Streets" Pedestrian	\$0.00	Yes
ML16033	Coachella Valley Association of Gov	4/27/2016	4/26/2018		\$250,000.00	\$250,000.00	Street Sweeping Operations in Coachella Valley	\$0.00	Yes
ML16034	City of Riverside	3/11/2016	10/10/2018	7/10/2020	\$500,000.00	\$500,000.00	Implement a "Complete Streets" Pedestrian	\$0.00	Yes
ML16036	City of Brea	3/4/2016	12/3/2018		\$500,000.00	\$500,000.00	Install a Class 1 Bikeway	\$0.00	Yes
ML16037	City of Rancho Cucamonga	2/5/2016	11/4/2022		\$30,000.00	\$30,000.00	Purchase One Heavy-Duty Natural Gas Vehicle	\$0.00	Yes
ML16038	City of Palm Springs	4/1/2016	7/31/2022	9/30/2022	\$170,000.00	\$60,000.00	Install Bicycle Lanes & Purchase 2 Heavy-Duty Nat. Gas Vehicles	\$110,000.00	Yes
ML16042	City of San Dimas	4/1/2016	12/31/2019	12/31/2021	\$55,000.00	\$55,000.00	Install EV Charging Infrastructure	\$0.00	No
ML16045	City of Anaheim	6/22/2016	8/21/2019		\$275,000.00	\$255,595.08	Maintenance Facility Modifications	\$19,404.92	Yes
ML16046	City of El Monte	4/1/2016	5/31/2021	5/31/2023	\$20,160.00	\$14,637.50	Install EV Charging Infrastructure	\$5,522.50	Yes
ML16049	City of Buena Park	4/1/2016	11/30/2018		\$429,262.00	\$429,262.00	Installation of a Class 1 Bikeway	\$0.00	Yes
ML16050	City of Westminster	5/6/2016	7/5/2020	5/5/2022	\$115,000.00	\$93,925.19	Installation of EV Charging Infrastructure	\$21,074.81	Yes
ML16051	City of South Pasadena	2/12/2016	1/11/2017	12/11/2017	\$320,000.00	\$258,691.25	Implement "Open Streets" Event with Various Activities	\$61,308.75	Yes
ML16052	City of Rancho Cucamonga	9/3/2016	11/2/2019	3/31/2021	\$315,576.00	\$305,576.00	Install Two Class 1 Bikeways	\$10,000.00	Yes
ML16053	City of Claremont	3/11/2016	7/10/2018	12/10/2020	\$498,750.00	\$498,750.00	Implement a "Complete Streets" Pedestrian	\$0.00	Yes
ML16054	City of Yucaipa	3/26/2016	7/26/2018	10/25/2019	\$120,000.00	\$120,000.00	Implement a "Complete Streets" Pedestrian	\$0.00	Yes
ML16055	City of Ontario	5/6/2016	5/5/2022		\$270,000.00	\$270,000.00	Purchase Nine Heavy-Duty Natural-Gas Vehicles	\$0.00	Yes
ML16056	City of Ontario	3/23/2016	9/22/2020	9/22/2021	\$106,565.00	\$106,565.00	Expansion of an Existing CNG Station	\$0.00	Yes
ML16059	City of Burbank	4/1/2016	2/28/2022		\$180,000.00	\$180,000.00	Purchase 6 H.D. Nat. Gas Vehicles	\$0.00	Yes
ML16060	City of Cudahy	2/5/2016	10/4/2017		\$73,910.00	\$62,480.00	Implement an "Open Streets" Event	\$11,430.00	Yes
ML16061	City of Murrieta	4/27/2016	1/26/2020		\$11,642.00	\$9,398.36	Installation of EV Charging Infrastructure	\$2,243.64	Yes
ML16062	City of Colton	6/3/2016	7/2/2020		\$21,003.82	\$21,003.82	Installation of EV Charging Infrastructure	\$0.00	Yes
ML16063	City of Glendora	3/4/2016	4/3/2022		\$30,000.00	\$30,000.00	Purchase One H.D. Nat. Gas Vehicle	\$0.00	Yes
ML16064	County of Orange, OC Parks	2/21/2017	10/20/2018		\$204,073.00	\$157,632.73	Implement "Open Streets" Events with Various Activities	\$46,440.27	Yes
ML16066	City of Long Beach Public Works	1/13/2017	9/12/2018		\$75,050.00	\$63,763.62	Implement an "Open Streets" Event	\$11,286.38	Yes

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
ML16068	Riverside County Dept of Public Heal	12/2/2016	8/1/2018		\$171,648.00	\$171,648.00	Implement "Open Streets" Events with Vario	\$0.00	Yes
ML16069	City of West Covina	3/10/2017	6/9/2021		\$54,199.00	\$54,199.00	Installation of EV Charging Infrastructure	\$0.00	Yes
ML16071	City of Highland	5/5/2017	1/4/2020	1/4/2023	\$264,500.00	\$264,500.00	Implement a "Complete Streets" Pedestrian	\$0.00	Yes
ML16072	City of Palm Desert	3/4/2016	1/4/2020	1/3/2022	\$56,000.00	\$56,000.00	Installation of EV Charging Infrastructure	\$0.00	Yes
ML16073	City of Long Beach Public Works	1/13/2017	7/12/2017		\$50,000.00	\$50,000.00	Implement an "Open Streets" Event	\$0.00	Yes
ML16076	City of San Fernando	2/21/2017	8/20/2021		\$43,993.88	\$43,993.88	Install EV Charging Infrastructure	\$0.00	Yes
ML16078	City of Moreno Valley	5/6/2016	11/5/2017	5/5/2018	\$32,800.00	\$31,604.72	Install Bicycle Infrastructure & Implement Bi	\$1,195.28	Yes
ML16079	City of Yucaipa	4/1/2016	3/31/2020		\$5,000.00	\$5,000.00	Purchase Electric Lawnmower	\$0.00	Yes
ML16083	City of El Monte	4/1/2016	4/30/2021	4/30/2023	\$57,210.00	\$25,375.60	Install EV Charging Infrastructure	\$31,834.40	Yes
ML16122	City of Wildomar	6/8/2018	6/7/2019		\$500,000.00	\$500,000.00	Install Bicycle Lanes	\$0.00	Yes
ML16126	City of Palm Springs	7/31/2019	7/30/2020	10/30/2020	\$22,000.00	\$19,279.82	Install Bicycle Racks, and Implement Bicycle	\$2,720.18	Yes
MS16001	Los Angeles County MTA	4/1/2016	4/30/2017		\$1,350,000.00	\$1,332,039.84	Clean Fuel Transit Service to Dodger Stadiu	\$17,960.16	Yes
MS16002	Orange County Transportation Autho	10/6/2015	5/31/2016		\$722,266.00	\$703,860.99	Clean Fuel Transit Service to Orange Count	\$18,405.01	Yes
MS16003	Special Olympics World Games Los	10/9/2015	12/30/2015		\$380,304.00	\$380,304.00	Low-Emission Transportation Service for Sp	\$0.00	Yes
MS16004	Mineral LLC	9/4/2015	7/3/2017	1/3/2018	\$27,690.00	\$9,300.00	Design, Develop, Host and Maintain MSRC	\$18,390.00	Yes
MS16029	Orange County Transportation Autho	1/12/2018	6/11/2020		\$836,413.00	\$567,501.06	TCM Partnership Program - OC Bikeways	\$268,911.94	Yes
MS16030	Better World Group Advisors	12/19/2015	12/31/2017	12/31/2019	\$271,619.00	\$245,355.43	Programmic Outreach Services to the MSR	\$26,263.57	Yes
MS16081	EDCO Disposal Corporation	3/4/2016	10/3/2022		\$150,000.00	\$150,000.00	Expansion of Existing Public Access CNG St	\$0.00	Yes
MS16084	Transit Systems Unlimited, Inc.	5/6/2016	2/28/2018		\$565,600.00	\$396,930.00	Implement Special Shuttle Service from Uni	\$168,670.00	Yes
MS16085	Southern California Regional Rail Au	3/11/2016	9/30/2016		\$78,033.00	\$64,285.44	Special MetroLink Service to Autoclub Spee	\$13,747.56	Yes
MS16086	San Bernardino County Transportatio	9/3/2016	10/2/2021		\$800,625.00	\$769,021.95	Freeway Service Patrols	\$31,603.05	Yes
MS16087	Burrtec Waste & Recycling Services,	7/8/2016	3/7/2023		\$100,000.00	\$100,000.00	Construct New Limited-Access CNG Station	\$0.00	Yes
MS16088	Transit Systems Unlimited, Inc.	5/12/2017	1/11/2023		\$17,000.00	\$17,000.00	Expansion of Existing CNG Station	\$0.00	Yes
MS16089	Orange County Transportation Autho	7/8/2016	4/30/2017		\$128,500.00	\$128,500.00	Implement Special Bus Service to Angel Sta	\$0.00	Yes
MS16092	San Bernardino County Transportatio	2/3/2017	1/2/2019		\$242,937.00	\$242,016.53	Implement a Series of "Open Streets" Event	\$920.47	Yes
MS16093	Orange County Transportation Autho	9/3/2016	3/2/2018	9/2/2018	\$1,553,657.00	\$1,499,575.85	Implement a Mobile Ticketing System	\$54,081.15	Yes
MS16095	Orange County Transportation Autho	7/22/2016	5/31/2017		\$694,645.00	\$672,864.35	Implement Special Bus Service to Orange C	\$21,780.65	Yes
MS16096	San Bernardino County Transportatio	10/27/2016	12/26/2019	6/30/2021	\$450,000.00	\$450,000.00	EV Charging Infrastructure	\$0.00	Yes
MS16097	Walnut Valley Unified School District	10/7/2016	11/6/2022		\$250,000.00	\$250,000.00	Expand CNG Station & Modify Maintenance	\$0.00	Yes
MS16099	Foothill Transit	3/3/2017	3/31/2017		\$50,000.00	\$50,000.00	Provide Special Bus Service to the Los Ange	\$0.00	Yes
MS16100	Southern California Regional Rail Au	5/5/2017	9/30/2017		\$80,455.00	\$66,169.43	Provide Metrolink Service to Autoclub Speed	\$14,285.57	Yes
MS16102	Nasa Services, Inc.	2/21/2017	4/20/2023		\$100,000.00	\$100,000.00	Construct a Limited-Access CNG Station	\$0.00	Yes
MS16103	Arrow Services, Inc.	2/3/2017	4/2/2023		\$100,000.00	\$100,000.00	Construct a Limited-Access CNG Station	\$0.00	Yes
MS16116	Riverside Transit Agency	3/3/2017	1/2/2023		\$10,000.00	\$9,793.00	Purchase One Transit Bus	\$207.00	Yes
MS16119	Omnitrans	4/21/2017	8/20/2022		\$150,000.00	\$0.00	New Public Access CNG Station	\$150,000.00	No
MS16124	Riverside County Transportation Co	12/14/2018	12/14/2019	5/14/2020	\$253,239.00	\$246,856.41	Extended Freeway Service Patrols	\$6,382.59	Yes
MS16125	San Bernardino County Transportatio	9/20/2019	11/19/2020		\$1,000,000.00	\$1,000,000.00	Traffic Signal Synchronization Projects	\$0.00	Yes

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
MS16127	Los Angeles County MTA	6/29/2021		6/28/2022	\$2,500,000.00	\$2,500,000.00	Expansion of the Willowbrook/Rosa Parks Tr	\$0.00	Yes

Total: 77

Closed/Incomplete Contracts

ML16005	City of Palm Springs	3/4/2016	10/3/2017		\$40,000.00	\$0.00	Install Bicycle Racks, and Implement Bicycle	\$40,000.00	No
ML16035	City of Wildomar	4/1/2016	11/1/2017		\$500,000.00	\$0.00	Install Bicycle Lanes	\$500,000.00	No
MS16082	Riverside County Transportation Co	9/3/2016	8/2/2018		\$590,759.00	\$337,519.71	Extended Freeway Service Patrols	\$253,239.29	No
MS16090	Los Angeles County MTA	10/27/2016	4/26/2020	10/26/2020	\$2,500,000.00	\$0.00	Expansion of the Willowbrook/Rosa Parks Tr	\$2,500,000.00	No
MS16091	San Bernardino County Transportatio	10/7/2016	11/6/2018		\$1,000,000.00	\$0.00	Traffic Signal Synchronization Projects	\$1,000,000.00	No

Total: 5

Open/Complete Contracts

ML16008	City of Pomona	9/20/2016	11/19/2022	5/19/2025	\$60,000.00	\$60,000.00	Purchase 3 Medium-Duty and 1 Heavy-Duty	\$0.00	Yes
ML16013	City of Monterey Park	12/4/2015	7/3/2022	7/3/2024	\$90,000.00	\$90,000.00	Purchase 3 Heavy-Duty Nat. Gas Vehicles	\$0.00	Yes
ML16021	City of Santa Clarita	10/7/2016	6/6/2024		\$49,400.00	\$49,399.00	Install EV Charging Infrastructure	\$1.00	Yes
ML16041	City of Moreno Valley	9/3/2016	1/2/2021	4/2/2024	\$20,000.00	\$20,000.00	Install EV Charging Infrastructure	\$0.00	Yes
ML16058	Los Angeles County Department of P	10/7/2016	4/6/2024		\$371,898.00	\$371,898.00	Purchase 11 H.D. Nat. Gas Vehicles and Ins	\$0.00	Yes
ML16070	City of Beverly Hills	2/21/2017	6/20/2023		\$90,000.00	\$90,000.00	Purchase 3 H.D. Nat. Gas Vehicles	\$0.00	Yes
MS16105	Huntington Beach Union High School	3/3/2017	7/2/2024		\$175,000.00	\$175,000.00	Expansion of Existing CNG Infrastructure	\$0.00	Yes
MS16112	Orange County Transportation Autho	4/14/2017	3/13/2024		\$1,470,000.00	\$1,470,000.00	Repower Up to 98 Transit Buses	\$0.00	Yes
MS16113	Los Angeles County MTA	5/12/2017	4/11/2024		\$1,875,000.00	\$1,875,000.00	Repower Up to 125 Transit Buses	\$0.00	Yes
MS16114	City of Norwalk	3/3/2017	6/2/2024		\$32,170.00	\$32,170.00	Purchase 3 Transit Buses	\$0.00	Yes
MS16115	City of Santa Monica	4/14/2017	7/13/2025		\$450,000.00	\$450,000.00	Repower 30 Transit Buses	\$0.00	Yes
MS16117	Omnitrans	4/21/2017	6/20/2023		\$175,000.00	\$175,000.00	Expansion of Existing CNG Infrastructure	\$0.00	Yes
MS16118	Omnitrans	4/21/2017	6/20/2023		\$175,000.00	\$175,000.00	Expansion of Existing CNG Infrastructure	\$0.00	Yes

Total: 13

Terminated Contracts

ML16010	City of Fullerton	10/7/2016	4/6/2023	4/6/2024	\$78,222.00	\$27,896.71	Install EV Charging Stations	\$50,325.29	Yes
ML16048	City of Placentia	3/26/2016	5/25/2021	12/25/2026	\$80,000.00	\$18,655.00	Install EV Charging Infrastructure	\$61,345.00	Yes

Total: 2

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
FY 2016-2018 Contracts									
Open Contracts									
ML18031	City of Diamond Bar	9/7/2018	11/6/2025	11/6/2027	\$58,930.00	\$38,930.00	Install EVSE, Purchase up to 2-LD Vehicles	\$20,000.00	No
ML18036	City of Indian Wells	8/8/2018	5/7/2023	5/7/2026	\$50,000.00	\$50,000.00	Install EV Charging Stations	\$0.00	No
ML18046	City of Santa Ana - Public Works Ag	11/9/2018	7/8/2026		\$385,000.00	\$285,000.00	Purchase 6 Light-Duty ZEVs, 9 Heavy-Duty	\$100,000.00	No
ML18047	City of Whittier	8/8/2018	4/7/2026	1/7/2029	\$113,910.00	\$68,346.00	Purchase 5 Heavy-Duty Near-Zero Emission	\$45,564.00	No
ML18050	City of Irvine	9/7/2018	8/6/2028		\$330,490.00	\$0.00	Purchase 1 Medium/Heavy-Duty ZEV and In	\$330,490.00	No
ML18051	City of Rancho Cucamonga	3/1/2019	10/31/2025	4/30/2027	\$91,500.00	\$72,500.00	Purchase 6 Light-Duty ZEVs, Install 3 Limite	\$19,000.00	No
ML18055	City of Long Beach	11/29/2018	11/28/2026		\$622,220.00	\$302,401.53	Install EV Charging Stations	\$319,818.47	No
ML18057	City of Carson	10/5/2018	7/4/2023	12/15/2026	\$106,250.00	\$50,000.00	Purchase 5 Zero-Emission Vehicles and Infr	\$56,250.00	No
ML18058	City of Perris	10/12/2018	11/11/2024	11/11/2028	\$94,624.00	\$0.00	Purchase 1 Medium-Duty ZEV and EV Char	\$94,624.00	No
ML18059	City of Glendale Water & Power	2/1/2019	7/31/2026	1/31/2028	\$260,500.00	\$232,315.70	Install Electric Vehicle Charging Infrastructur	\$28,184.30	No
ML18060	County of Los Angeles Internal Servi	10/5/2018	8/4/2026	8/4/2028	\$1,367,610.00	\$724,868.96	Purchase 29 Light-Duty Zero Emission Vehi	\$642,741.04	No
ML18063	City of Riverside	6/7/2019	1/6/2027	3/6/2028	\$50,000.00	\$0.00	Expand Existing CNG Station	\$50,000.00	No
ML18064	City of Eastvale	11/29/2018	4/28/2026	4/28/2028	\$80,400.00	\$28,457.43	Purchase 2 Light-Duty, One Medium-Duty. Z	\$51,942.57	No
ML18067	City of Pico Rivera	9/7/2018	11/6/2022	6/6/2026	\$83,500.00	\$0.00	Install EVSE	\$83,500.00	No
ML18068	City of Mission Viejo	7/31/2019	6/30/2027		\$86,940.00	\$10,000.00	Purchase 2 Light-Duty ZEVs & Install EVSE	\$76,940.00	No
ML18069	City of Torrance	3/1/2019	7/31/2027		\$187,400.00	\$100,000.00	Purchase 4 Heavy-Duty Near-Zero Emission	\$87,400.00	No
ML18078	County of Riverside	10/5/2018	10/4/2028		\$375,000.00	\$300,000.00	Purchase 15 Heavy-Duty Vehicles	\$75,000.00	No
ML18082	City of Los Angeles Bureau of Sanita	8/30/2019	8/29/2028	8/29/2029	\$900,000.00	\$0.00	Purchase Medium-Duty Vehicles and EV Ch	\$900,000.00	No
ML18084	City of South El Monte	10/18/2019	9/17/2023	9/17/2024	\$30,000.00	\$0.00	EV Charging Infrastructure	\$30,000.00	No
ML18089	City of Glendora	7/19/2019	4/18/2025	10/18/2028	\$50,760.00	\$0.00	Purchase a medium-duty ZEV	\$50,760.00	No
ML18091	City of Temecula	1/19/2019	7/18/2023	3/18/2026	\$141,000.00	\$0.00	Install Sixteen EV Charging Stations	\$141,000.00	No
ML18092	City of South Pasadena	2/1/2019	1/31/2025	4/30/2027	\$50,000.00	\$20,000.00	Procure Two Light-Duty ZEVs and Install EV	\$30,000.00	No
ML18093	City of Monterey Park	2/1/2019	2/28/2026	10/31/2028	\$25,000.00	\$0.00	Purchase Heavy-Duty Near-ZEV	\$25,000.00	No
ML18094	City of Laguna Woods	7/12/2019	12/11/2024		\$50,000.00	\$0.00	Install Two EV Charging Stations	\$50,000.00	No
ML18101	City of Burbank	2/1/2019	4/30/2024	10/30/2024	\$137,310.00	\$0.00	Install Twenty EV Charging Stations	\$137,310.00	No
ML18129	City of Yucaipa	12/14/2018	3/13/2023	9/13/2027	\$63,097.00	\$0.00	Install Six EV Charging Stations	\$63,097.00	No
ML18132	City of Montclair	4/5/2019	9/4/2023	9/4/2026	\$40,000.00	\$0.00	Install Eight EVSEs	\$40,000.00	No
ML18134	City of Los Angeles Dept of General	5/3/2019	5/2/2028		\$290,000.00	\$0.00	Purchase Five Medium-Duty ZEVs	\$290,000.00	No
ML18135	City of Azusa	12/6/2019	12/5/2029		\$55,000.00	\$0.00	Purchase Three Light-Duty ZEVs and One H	\$55,000.00	No
ML18141	City of Rolling Hills Estates	2/14/2020	1/13/2024	4/13/2026	\$40,000.00	\$10,000.00	Purchase One Light-Duty ZEV and Install T	\$30,000.00	No
ML18144	City of Fontana Public Works	10/4/2019	12/3/2023	12/31/2025	\$269,090.00	\$269,090.00	Install Twelve EVSEs	\$0.00	No
ML18145	City of Los Angeles Dept of Transpor	1/10/2020	4/9/2027	4/9/2028	\$1,400,000.00	\$0.00	Provide One Hundred Rebates to Purchaser	\$1,400,000.00	No
ML18146	City of South Gate	3/1/2019	11/30/2023	11/30/2026	\$127,400.00	\$50,000.00	Purchase Five Light-Duty ZEVs and Install T	\$77,400.00	No
ML18147	City of Palm Springs	1/10/2019	1/9/2024	7/9/2026	\$60,000.00	\$0.00	Install Eighteen EV Charging Stations	\$60,000.00	No

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
ML18148	City of San Dimas	1/21/2022	5/20/2023	5/20/2024	\$50,000.00	\$0.00	Implement Bicycle Detection Measures	\$50,000.00	No
ML18151	County of San Bernardino Departme	8/25/2020	10/24/2029		\$200,000.00	\$150,000.00	Purchase Eight Heavy-Duty Near Zero Emis	\$50,000.00	No
ML18152	County of San Bernardino Flood Con	8/11/2020	10/10/2029		\$108,990.00	\$75,000.00	Purchase Five Heavy-Duty Near Zero Emissi	\$33,990.00	No
ML18159	City of Rialto	12/13/2019	5/12/2024	9/19/2025	\$135,980.00	\$106,597.86	Purchase Nine Light-Duty ZEVs and EV Cha	\$29,382.14	No
ML18163	City of San Clemente	3/8/2019	12/7/2024	12/7/2025	\$85,000.00	\$70,533.75	Purchase Four Light-Duty ZEVs and EV Cha	\$14,466.25	No
ML18166	City of Placentia	2/18/2021	5/17/2027		\$25,000.00	\$0.00	Purchase One Heavy-Duty Near-Zero Emiss	\$25,000.00	No
ML18177	City of San Bernardino	6/7/2019	12/6/2026	12/6/2028	\$279,088.00	\$0.00	Purchase Medium- and Heavy-Duty Evs and	\$279,088.00	No
ML18178	City of La Puente	11/1/2019	11/30/2025	11/30/2028	\$25,000.00	\$0.00	Purchase One Heavy-Duty Near-Zero Emiss	\$25,000.00	No
MS18015	Southern California Association of G	7/13/2018	2/28/2021	11/30/2023	\$2,000,000.00	\$415,803.97	Southern California Future Communities Par	\$1,584,196.03	No
MS18023	Riverside County Transportation Co	6/28/2018	6/27/2021	3/31/2023	\$500,000.00	\$500,000.00	Weekend Freeway Service Patrols	\$0.00	No
MS18024	Riverside County Transportation Co	6/28/2018	8/27/2021	8/31/2024	\$1,500,000.00	\$902,260.00	Vanpool Incentive Program	\$597,740.00	No
MS18027	City of Gardena	11/2/2018	9/1/2026	1/1/2028	\$365,000.00	\$0.00	Install New Limited Access CNG, Modify Mai	\$365,000.00	No
MS18029	Irvine Ranch Water District	8/8/2018	10/7/2024	1/7/2029	\$185,000.00	\$0.00	Install New Limited Access CNG Station & T	\$185,000.00	No
MS18065	San Bernardino County Transportatio	3/29/2019	8/28/2023		\$2,000,000.00	\$2,000,000.00	Implement Metrolink Line Fare Discount Pro	\$0.00	No
MS18073	Los Angeles County MTA	1/10/2019	2/9/2026		\$2,000,000.00	\$2,000,000.00	Purchase 40 Zero-Emission Transit Buses	\$0.00	Yes
MS18106	R.F. Dickson Co., Inc.	7/19/2019	1/18/2026		\$265,000.00	\$250,000.00	Expansion of Existing Infrastructure/Mechani	\$15,000.00	No
MS18108	Capistrano Unified School District	2/1/2019	5/30/2025	9/30/2026	\$111,750.00	\$111,750.00	Expansion of Existing Infrastructure	\$0.00	Yes
MS18110	Mountain View Unified School Distric	2/1/2019	3/31/2025		\$275,000.00	\$61,747.29	Install New Limited-Access CNG Infrastructu	\$213,252.71	No
MS18180	Omnitrans	8/4/2022	8/3/2023		\$83,000.00	\$0.00	Modify Vehicle Maintenance Facility and Trai	\$83,000.00	No
MS18181	San Bernardino County Transportatio	4/10/2023	9/9/2030		\$1,662,000.00	\$0.00	Construct Hydrogen Fueling Station	\$1,662,000.00	No
MS18182	Air Products and Chemicals Inc.	3/8/2023	2/7/2031		\$1,000,000.00	\$0.00	Install Publicly Accessible Hydrogen Fueling	\$1,000,000.00	No
MS18183	Nikola-TA HRS 1, LLC	9/28/2022	1/27/2030		\$1,660,000.00	\$0.00	Install Publicly Accessible Hydrogen Fueling	\$1,660,000.00	No

Total: 56

Pending Execution Contracts

ML18185	City of Wildomar				\$25,000.00	\$0.00	Install Bicycle Trail	\$25,000.00	No
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Total: 1

Declined/Cancelled Contracts

ML18044	City of Malibu	8/8/2018	10/7/2022	10/7/2023	\$50,000.00	\$0.00	Install EV Charging Infrastructure	\$50,000.00	No
ML18053	City of Paramount	9/7/2018	3/6/2023		\$64,675.00	\$0.00	Install EV Charging Infrastructure	\$64,675.00	No
ML18075	City of Orange				\$25,000.00	\$0.00	One Heavy-Duty Vehicle	\$25,000.00	No
ML18140	City of Bell Gardens	12/14/2018	12/13/2028		\$50,000.00	\$0.00	Purchase Two Heavy-Duty Near-ZEVs	\$50,000.00	No
ML18149	City of Sierra Madre				\$50,000.00	\$0.00	Implement Bike Share Program	\$50,000.00	No
ML18150	City of South El Monte				\$20,000.00	\$0.00	Implement Bike Share Program	\$20,000.00	No
ML18153	City of Cathedral City	5/3/2019	4/2/2025		\$52,215.00	\$0.00	Install EV Charging Infrastructure	\$52,215.00	No
ML18158	City of Inglewood				\$146,000.00	\$0.00	Purchase 4 Light-Duty Zero Emission, 4 Hea	\$146,000.00	No
ML18164	City of Pomona				\$200,140.00	\$0.00	Purchase Three Heavy-Duty ZEVs	\$200,140.00	No
ML18165	City of Baldwin Park	2/1/2019	1/30/2024		\$49,030.00	\$0.00	Expand CNG Station	\$49,030.00	No

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
ML18172	City of Huntington Park	3/1/2019	2/28/2025		\$65,450.00	\$0.00	Purchase One Heavy-Duty ZEV	\$65,450.00	No
ML18174	City of Bell	11/22/2019	7/21/2026		\$25,000.00	\$0.00	Purchase One Heavy-Duty Near-Zero Emiss	\$25,000.00	No
MS18009	Penske Truck Leasing Co., L.P.	8/8/2018	12/7/2020		\$82,500.00	\$0.00	Modify Maintenance Facility & Train Technici	\$82,500.00	No
MS18013	California Energy Commission				\$3,000,000.00	\$0.00	Advise MSRC and Administer Hydrogen Infr	\$3,000,000.00	No
MS18017	City of Banning				\$225,000.00	\$0.00	Expansion of Existing CNG Infrastructure	\$225,000.00	No
MS18018	City of Norwalk	6/8/2018	9/7/2019		\$75,000.00	\$0.00	Vehicle Maintenance Facility Modifications	\$75,000.00	No
MS18107	Huntington Beach Union High School				\$225,000.00	\$0.00	Expansion of Existing Infrastructure	\$225,000.00	No
MS18109	City of South Gate				\$175,000.00	\$0.00	Install New Limited-Access CNG Infrastructu	\$175,000.00	No
MS18111	Newport-Mesa Unified School Distric				\$175,000.00	\$0.00	Expansion of Existing CNG Infrastructure	\$175,000.00	No
MS18112	Banning Unified School District	11/29/2018	11/28/2024	11/28/2025	\$275,000.00	\$0.00	Install New CNG Infrastructure	\$275,000.00	No
MS18113	City of Torrance				\$100,000.00	\$0.00	Expansion of Existing CNG Infrastructure	\$100,000.00	No
MS18114	Los Angeles County Department of P	11/15/2019	11/14/2026		\$175,000.00	\$0.00	Install New Limited-Access CNG Infrastructu	\$175,000.00	No
MS18116	Los Angeles County Department of P	11/15/2019	11/14/2026		\$175,000.00	\$0.00	Install New Limited-Access CNG Infrastructu	\$175,000.00	No
MS18119	LBA Realty Company XI LP				\$100,000.00	\$0.00	Install New Limited-Access CNG Infrastructu	\$100,000.00	No
MS18121	City of Montebello				\$70,408.00	\$0.00	Expansion of Existing CNG Infrastructure	\$70,408.00	No
MS18175	Regents of the University of Californi	6/7/2019	8/6/2025	8/6/2026	\$1,000,000.00	\$0.00	Expansion of Existing Hydrogen Station	\$1,000,000.00	No
MS18184	Clean Energy				\$1,000,000.00	\$0.00	Install Publicly Accessible Hydrogen Fueling	\$1,000,000.00	No

Total: 27

Closed Contracts

ML18019	City of Hidden Hills	5/3/2018	5/2/2022	5/2/2023	\$49,999.00	\$49,999.00	Purchase Two Light-Duty ZEVs and EVSE	\$0.00	Yes
ML18021	City of Signal Hill	4/6/2018	1/5/2022		\$49,661.00	\$46,079.31	Install EV Charging Stations	\$3,581.69	Yes
ML18022	City of Desert Hot Springs	5/3/2018	1/2/2020	1/2/2021	\$50,000.00	\$50,000.00	Traffic Signal and Synchronization Project	\$0.00	Yes
ML18034	City of Calabasas	6/8/2018	3/7/2022	3/7/2023	\$50,000.00	\$50,000.00	Install EVSE	\$0.00	Yes
ML18035	City of Westlake Village	8/8/2018	11/7/2022		\$50,000.00	\$50,000.00	Install EVSE	\$0.00	Yes
ML18040	City of Agoura Hills	7/13/2018	6/12/2022		\$17,914.00	\$17,914.00	Install EV Charging Infrastructure	\$0.00	Yes
ML18049	City of Downey	7/6/2018	5/5/2023		\$148,260.00	\$148,116.32	Install EV Charging Stations	\$143.68	Yes
ML18052	City of Garden Grove	8/8/2018	10/7/2022		\$53,593.00	\$46,164.28	Purchase 4 L.D. ZEVs and Infrastructure	\$7,428.72	Yes
ML18054	City of La Habra Heights	8/8/2018	4/7/2022		\$9,200.00	\$9,200.00	Purchase 1 L.D. ZEV	\$0.00	Yes
ML18070	City of Lomita	11/29/2018	6/28/2022		\$6,250.00	\$6,250.00	Purchase 1 Light-Duty ZEV	\$0.00	Yes
ML18071	City of Chino Hills	9/7/2018	10/6/2022		\$20,000.00	\$20,000.00	Purchase 2 Light-Duty ZEVs	\$0.00	Yes
ML18077	City of Orange	11/2/2018	10/1/2022		\$59,776.00	\$59,776.00	Four Light-Duty ZEV and EV Charging Infr	\$0.00	Yes
ML18086	City of Los Angeles Bureau of Street	2/8/2019	4/7/2023		\$300,000.00	\$300,000.00	Install Sixty EV Charging Stations	\$0.00	Yes
ML18088	City of Big Bear Lake	11/29/2018	8/28/2020	8/28/2021	\$50,000.00	\$50,000.00	Install Bicycle Trail	\$0.00	Yes
ML18097	City of Temple City	11/29/2018	7/28/2022		\$16,000.00	\$12,000.00	Purchase Two Light-Duty ZEVs	\$4,000.00	Yes
ML18126	City of Lomita	12/7/2018	1/6/2020		\$26,500.00	\$13,279.56	Install bicycle racks and lanes	\$13,220.44	Yes
ML18127	City of La Puente	2/1/2019	2/28/2023		\$10,000.00	\$7,113.70	Purchase Light-Duty Zero Emission Vehicle	\$2,886.30	Yes
ML18130	City of Lake Forest	3/1/2019	9/30/2022		\$106,480.00	\$106,480.00	Install Twenty-One EVSEs	\$0.00	Yes

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
ML18131	City of Los Angeles, Police Departm	5/3/2019	12/2/2022		\$19,294.00	\$19,294.00	Purchase Three Light-Duty ZEVs	\$0.00	Yes
ML18138	City of La Canada Flintridge	2/8/2019	5/7/2023		\$32,589.00	\$32,588.07	Install Four EVSEs and Install Bicycle Racks	\$0.93	Yes
ML18139	City of Calimesa	8/30/2019	7/29/2020	11/29/2021	\$50,000.00	\$50,000.00	Install Bicycle Lane	\$0.00	Yes
ML18160	City of Irwindale	3/29/2019	12/28/2022		\$14,263.00	\$14,263.00	Purchase Two Light-Duty ZEVs	\$0.00	Yes
ML18173	City of Manhattan Beach	3/29/2019	2/28/2023		\$49,000.00	\$49,000.00	Purchase Two Light-Duty ZEVs and EV Cha	\$0.00	Yes
ML18179	City of Rancho Mirage	8/20/2021	2/19/2022		\$50,000.00	\$50,000.00	Traffic Signal Synchronization	\$0.00	Yes
MS18001	Los Angeles County MTA	6/29/2017	4/30/2018		\$807,945.00	\$652,737.07	Provide Clean Fuel Transit Service to Dodge	\$155,207.93	Yes
MS18002	Southern California Association of G	6/9/2017	11/30/2018	12/30/2021	\$2,500,000.00	\$2,276,272.46	Regional Active Transportation Partnership	\$223,727.54	Yes
MS18003	Geographics	2/21/2017	2/20/2021	6/20/2021	\$72,453.00	\$65,521.32	Design, Host and Maintain MSRC Website	\$6,931.68	Yes
MS18004	Orange County Transportation Autho	8/3/2017	4/30/2019		\$503,272.00	\$456,145.29	Provide Special Rail Service to Angel Stadiu	\$47,126.71	Yes
MS18005	Orange County Transportation Autho	1/5/2018	4/30/2019		\$834,222.00	\$834,222.00	Clean Fuel Bus Service to OC Fair	\$0.00	Yes
MS18006	Anaheim Transportation Network	10/6/2017	2/28/2020		\$219,564.00	\$9,488.22	Implement Anaheim Circulator Service	\$210,075.78	Yes
MS18008	Foothill Transit	1/12/2018	3/31/2019		\$100,000.00	\$99,406.61	Special Transit Service to LA County Fair	\$593.39	Yes
MS18010	Southern California Regional Rail Au	12/28/2017	7/31/2019		\$351,186.00	\$275,490.61	Implement Special Metrolink Service to Unio	\$75,695.39	Yes
MS18011	Southern California Regional Rail Au	2/9/2018	6/30/2018		\$239,565.00	\$221,725.12	Special Train Service to Festival of Lights	\$17,839.88	Yes
MS18014	Regents of the University of Californi	10/5/2018	12/4/2019	3/4/2020	\$254,795.00	\$251,455.59	Planning for EV Charging Infrastructure Inve	\$3,339.41	Yes
MS18016	Southern California Regional Rail Au	1/10/2019	3/31/2019		\$87,764.00	\$73,140.89	Special Train Service to Auto Club Speedwa	\$14,623.11	Yes
MS18025	Los Angeles County MTA	11/29/2018	5/31/2019		\$1,324,560.00	\$961,246.86	Special Bus and Train Service to Dodger Sta	\$363,313.14	Yes
MS18102	Orange County Transportation Autho	10/4/2019	5/31/2020		\$1,146,000.00	\$1,146,000.00	Implement OC Flex Micro-Transit Pilot Proje	\$0.00	Yes
MS18103	Orange County Transportation Autho	2/8/2019	9/7/2020		\$642,000.00	\$613,303.83	Install Hydrogen Detection System	\$28,696.17	Yes
MS18104	Orange County Transportation Autho	2/21/2020	3/31/2021	3/31/2022	\$212,000.00	\$165,235.92	Implement College Pass Transit Fare Subsi	\$46,764.08	Yes
MS18105	Southern California Regional Rail Au	1/10/2019	6/30/2019		\$252,696.00	\$186,830.04	Special Train Service to the Festival of Light	\$65,865.96	Yes

Total: 40

Closed/Incomplete Contracts

ML18083	City of San Fernando	11/2/2018	11/1/2022		\$20,000.00	\$0.00	Implement Traffic Signal Synchronization	\$20,000.00	No
ML18133	City of Rancho Mirage	12/7/2018	11/6/2020		\$50,000.00	\$0.00	Traffic Signal Synchronization	\$50,000.00	No
ML18137	City of Wildomar	3/1/2019	5/31/2021	12/1/2022	\$50,000.00	\$0.00	Install Bicycle Trail	\$50,000.00	No
ML18167	City of Beverly Hills	3/29/2019	6/28/2025		\$50,000.00	\$0.00	Purchase Two Heavy-Duty Near-Zero Emiss	\$50,000.00	No
ML18168	City of Maywood	3/29/2019	11/28/2022		\$7,059.00	\$0.00	Purchase EV Charging Infrastructure	\$7,059.00	No
MS18026	Omnitrans	10/5/2018	1/4/2020		\$83,000.00	\$0.00	Modify Vehicle Maintenance Facility and Trai	\$83,000.00	No
MS18118	City of Beverly Hills	3/29/2019	7/28/2025		\$85,272.00	\$0.00	Expansion of Existing CNG Infrastructure	\$85,272.00	No

Total: 7

Open/Complete Contracts

ML18020	City of Colton	5/3/2018	4/2/2024	4/2/2027	\$67,881.00	\$67,881.00	Purchase One Medium-Duty and One Heavy	\$0.00	Yes
ML18028	City of Artesia	6/28/2018	3/27/2025		\$50,000.00	\$50,000.00	Install EVSE	\$0.00	Yes
ML18030	City of Grand Terrace	6/28/2018	3/27/2022	3/27/2025	\$45,000.00	\$45,000.00	Install EVSE	\$0.00	Yes
ML18032	City of Arcadia	2/1/2019	4/30/2025		\$24,650.00	\$24,650.00	Purchase 1 Heavy-Duty Near-ZEV	\$0.00	Yes

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
ML18033	City of Duarte	8/8/2018	2/7/2025		\$50,000.00	\$50,000.00	Purchase 1-HD ZEV	\$0.00	Yes
ML18037	City of Westminster	6/28/2018	6/27/2024	12/27/2026	\$120,900.00	\$120,900.00	Install EVSE, Purchase up to 3-LD ZEV & 1-	\$0.00	Yes
ML18038	City of Anaheim	10/5/2018	5/4/2025	5/4/2026	\$151,630.00	\$147,883.27	Purchase 5 Light-Duty ZEVs and Install EVS	\$3,746.73	Yes
ML18039	City of Redlands	6/28/2018	7/27/2024	1/27/2025	\$63,191.00	\$63,190.33	Purchase 1 Medium/Heavy-Duty ZEV and In	\$0.67	Yes
ML18041	City of West Hollywood	8/8/2018	12/7/2023	6/7/2024	\$50,000.00	\$50,000.00	Install EV Charging Infrastructure	\$0.00	Yes
ML18042	City of San Fernando	6/28/2018	2/27/2024		\$10,000.00	\$10,000.00	Purchase 1 Light-Duty ZEV	\$0.00	Yes
ML18043	City of Yorba Linda	9/7/2018	12/6/2023	12/6/2024	\$87,990.00	\$87,990.00	Install EV Charging Infrastructure	\$0.00	Yes
ML18045	City of Culver City Transportation De	6/28/2018	6/27/2025		\$51,000.00	\$51,000.00	Purchase Eight Near-Zero Vehicles	\$0.00	Yes
ML18048	City of Lynwood	6/28/2018	10/27/2024		\$93,500.00	\$44,505.53	Purchase Up to 3 Medium-Duty Zero-Emissi	\$48,994.47	Yes
ML18056	City of Chino	3/29/2019	9/28/2023		\$103,868.00	\$103,868.00	Install EV Charging Infrastructure	\$0.00	Yes
ML18061	City of Moreno Valley	4/9/2019	2/8/2025		\$25,000.00	\$25,000.00	Purchase 1 Heavy-Duty Near-ZEV	\$0.00	Yes
ML18062	City of Beaumont	8/8/2018	9/7/2024		\$25,000.00	\$25,000.00	Purchase 1 Heavy-Duty Near-ZEV	\$0.00	Yes
ML18072	City of Anaheim	12/18/2018	11/17/2026		\$239,560.00	\$239,560.00	Purchase 9 Light-Duty ZEVs & 2 Med/Hvy-D	\$0.00	Yes
ML18074	City of Buena Park	12/14/2018	6/13/2026		\$107,960.00	\$107,960.00	EV Charging Infrastructure	\$0.00	Yes
ML18076	City of Culver City Transportation De	10/5/2018	10/4/2023		\$1,130.00	\$1,130.00	Purchase Light-Duty ZEV	\$0.00	Yes
ML18079	City of Pasadena	12/7/2018	11/6/2023		\$183,670.00	\$183,670.00	EV Charging Infrastructure	\$0.00	Yes
ML18080	City of Santa Monica	1/10/2019	12/9/2023	9/9/2025	\$44,289.00	\$44,288.92	Install EV Charging Stations	\$0.08	Yes
ML18081	City of Beaumont	10/5/2018	10/4/2022	10/4/2025	\$31,870.00	\$31,870.00	EV Charging Infrastructure	\$0.00	Yes
ML18085	City of Orange	4/12/2019	10/11/2026		\$50,000.00	\$50,000.00	Purchase Two Heavy-Duty Near-Zero Emiss	\$0.00	Yes
ML18087	City of Murrieta	3/29/2019	3/28/2025		\$143,520.00	\$143,520.00	Install Four EV Charging Stations	\$0.00	Yes
ML18090	City of Santa Clarita	5/9/2019	2/8/2023	2/8/2024	\$122,000.00	\$118,978.52	Install Nine EV Charging Stations	\$3,021.48	Yes
ML18095	City of Gardena	11/9/2018	12/8/2024		\$25,000.00	\$25,000.00	Purchase Heavy-Duty Near-ZEV	\$0.00	Yes
ML18096	City of Highland	12/13/2019	8/12/2024		\$10,000.00	\$9,918.84	Purchase Light-Duty Zero Emission Vehicle	\$81.16	Yes
ML18098	City of Redondo Beach	2/1/2019	3/31/2023	3/31/2025	\$89,400.00	\$89,400.00	Install Six EV Charging Stations	\$0.00	Yes
ML18099	City of Laguna Hills	3/1/2019	5/31/2023	9/30/2024	\$32,250.00	\$32,250.00	Install EV Charging Stations	\$0.00	Yes
ML18100	City of Brea	10/29/2020	12/28/2024	12/31/2025	\$56,500.00	\$56,500.00	Install Twenty-Four Level II EV Charging Sta	\$0.00	Yes
ML18128	City of Aliso Viejo	8/30/2019	11/29/2023		\$65,460.00	\$65,389.56	Purchase Two Light-Duty ZEVs and Install S	\$70.44	Yes
ML18136	City of Orange	4/12/2019	8/11/2024		\$40,000.00	\$40,000.00	Purchase Four Light-Duty Zero Emission Ve	\$0.00	Yes
ML18142	City of La Quinta	4/24/2019	2/23/2023	8/23/2023	\$51,780.00	\$51,780.00	Install Two EV Charging Stations	\$0.00	Yes
ML18143	City of La Habra	10/18/2019	9/17/2025	9/17/2027	\$80,700.00	\$80,700.00	Install Two EV Charging Stations	\$0.00	Yes
ML18154	City of Hemet	11/22/2019	9/21/2023	3/21/2024	\$30,000.00	\$30,000.00	Purchase Two Light-Duty ZEVs and EV Cha	\$0.00	Yes
ML18155	City of Claremont	7/31/2019	9/30/2023		\$35,609.00	\$35,608.86	Install EV Charging Infrastructure	\$0.14	Yes
ML18156	City of Covina	2/1/2019	3/31/2023	12/31/2023	\$63,800.00	\$62,713.00	Purchase Four Light-Duty ZEVs and EV Cha	\$1,087.00	Yes
ML18157	City of Los Angeles Bureau of Street	6/21/2019	5/20/2027		\$85,000.00	\$85,000.00	Purchase One Medium-Duty ZEV	\$0.00	Yes
ML18161	City of Indio	5/3/2019	10/2/2025		\$25,000.00	\$25,000.00	Purchase 1 Light-Duty Zero Emission and E	\$0.00	Yes
ML18162	City of Costa Mesa	1/10/2020	7/9/2026		\$148,210.00	\$148,210.00	Purchase Three Light-Duty ZEVs and EV Ch	\$0.00	Yes
ML18169	City of Alhambra	6/14/2019	8/13/2024		\$111,980.00	\$111,980.00	Install EV Charging Infrastructure	\$0.00	Yes

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
ML18170	City of Laguna Niguel	1/10/2020	8/9/2028		\$75,100.00	\$75,100.00	Purchase One Light-Duty ZEV and EV Char	\$0.00	No
ML18171	City of El Monte	3/1/2019	4/30/2025		\$68,079.00	\$68,077.81	Purchase One Heavy-Duty ZEVs and EV Ch	\$1.19	Yes
ML18176	City of Coachella	3/1/2019	11/30/2024		\$58,020.00	\$58,020.00	Install EV Charging Stations	\$0.00	Yes
MS18012	City of Hermosa Beach	2/2/2018	2/1/2024		\$36,000.00	\$36,000.00	Construct New Limited-Access CNG Station	\$0.00	Yes
MS18066	El Dorado National	12/6/2019	2/5/2026		\$100,000.00	\$100,000.00	Install New Limited-Access CNG Station	\$0.00	Yes
MS18115	City of Commerce	6/7/2019	12/6/2025	7/6/2026	\$275,000.00	\$275,000.00	Expansion of Existing L/CNG Infrastructure	\$0.00	No
MS18117	City of San Bernardino	6/7/2019	11/6/2025		\$240,000.00	\$240,000.00	Expansion of Existing CNG Infrastructure/Me	\$0.00	Yes
MS18120	City of Redondo Beach	2/1/2019	9/30/2025		\$275,000.00	\$275,000.00	Install New Limited-Access CNG Infrastructu	\$0.00	Yes
MS18122	Universal Waste Systems, Inc.	2/1/2019	3/31/2025	7/31/2027	\$195,000.00	\$195,000.00	Install New Limited Access CNG Infrastructu	\$0.00	Yes
MS18123	City Rent A Bin DBA Serv-Wel Dispo	12/14/2018	2/13/2025		\$200,000.00	\$200,000.00	Install New Limited-Access CNG Infrastructu	\$0.00	Yes
MS18124	County Sanitation Districts of Los An	7/31/2019	2/28/2027		\$275,000.00	\$275,000.00	Install New Limited-Access CNG Infrastructu	\$0.00	Yes
MS18125	U.S. Venture	5/9/2019	8/8/2025		\$200,000.00	\$200,000.00	Install New Limited-Access CNG Infrastructu	\$0.00	Yes

Total: 53

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
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FY 2018-2021 Contracts

Open Contracts

MS21002	Better World Group Advisors	11/1/2019	12/31/2022	12/31/2024	\$448,154.00	\$184,320.55	Programmatic Outreach Services	\$263,833.45	No
MS21004	Los Angeles County MTA	1/7/2021	5/31/2023		\$814,822.00	\$326,899.00	Clean Fuel Bus Service to Dodger Stadium	\$487,923.00	No
MS21005	Southern California Association of G	5/5/2021	1/31/2024	7/31/2025	\$16,751,000.00	\$53,504.51	Implement Last Mile Goods Movement Progr	\$16,697,495.49	No
MS21006	Geographics	4/1/2021	6/20/2023	6/20/2025	\$20,152.00	\$9,656.75	Hosting & Maintenance of the MSRC Websit	\$10,495.25	No
MS21007	Penske Truck Leasing Co., L.P.	4/1/2022	3/31/2028		\$1,000,000.00	\$957,812.40	Deploy 5 Zero-Emission Yard Tractors	\$42,187.60	No
MS21009	ITS Technologies & Logistics, LLC	7/15/2022	7/14/2028		\$1,686,900.00	\$0.00	Deploy 12 Zero-Emission Yard Tractors	\$1,686,900.00	No
MS21010	MHX, LLC	9/29/2021	1/28/2028		\$569,275.00	\$0.00	Deploy One Zero-Emission Overhead Crane	\$569,275.00	No
MS21013	4 Gen Logistics	3/27/2022	5/26/2028		\$7,000,000.00	\$0.00	Deploy 40 Zero Emssion Trucks	\$7,000,000.00	No
MS21014	Green Fleet Systems, LLC	8/31/2021	8/30/2027		\$500,000.00	\$270,000.00	Deploy up to 5 Near Zero Emission Trucks	\$230,000.00	No
MS21015	Premium Transportation Services, In	9/22/2021	5/21/2027		\$1,500,000.00	\$1,334,758.50	Deploy up to 15 Near-Zero Emissions Truck	\$165,241.50	No
MS21016	Ryder Integrated Logistics, Inc.	12/7/2022	4/6/2029		\$3,169,746.00	\$0.00	Procure Two Integrated Power Centers and	\$3,169,746.00	No
MS21017	MHX, LLC	9/29/2021	9/28/2030		\$1,900,000.00	\$0.00	Deploy up to 10 Zero-Emission Trucks & Infr	\$1,900,000.00	No
MS21018	Pac Anchor Transportation, Inc.	8/17/2021	8/16/2027	8/16/2028	\$2,300,000.00	\$0.00	Deploy up to 23 Near Zero Emission Trucks	\$2,300,000.00	No
MS21019	Volvo Financial Services	3/31/2022	3/30/2030		\$3,930,270.00	\$1,095,869.15	Lease up to 14 Zero-Emission Trucks and P	\$2,834,400.85	No
MS21023	BNSF Railway Company	4/22/2022	4/21/2028	4/21/2029	\$1,313,100.00	\$0.00	Install EV Charging Infrastructure	\$1,313,100.00	No
MS21025	Costco Wholesale	12/9/2022	12/8/2028		\$160,000.00	\$0.00	Install Five EV Charging Units	\$160,000.00	No

Total: 16

Declined/Cancelled Contracts

MS21008	CMA CGM (America) LLC				\$3,000,000.00	\$0.00	Deploy 2 Zero-Emission Rubber Tire Gantry	\$3,000,000.00	No
MS21011	RDS Logistics Group	1/21/2022	7/20/2028		\$808,500.00	\$0.00	Deploy 3 Zero-Emission Yard Tractors and	\$808,500.00	No
MS21012	Amazon Logistics, Inc.				\$4,157,710.00	\$0.00	Deploy up to 10 Zero-Emission and 100 Nea	\$4,157,710.00	No
MS21020	Sea-Logix, LLC				\$2,300,000.00	\$0.00	Deploy up to 23 Near-Zero Emissions Trucks	\$2,300,000.00	No
MS21021	CMA CGM (America) LLC				\$1,946,463.00	\$0.00	Deploy up to 13 Near Zero Emission Trucks	\$1,946,463.00	No
MS21022	Orange County Transportation Autho				\$289,054.00	\$0.00	Implement Special Transit Service to the Or	\$289,054.00	No

Total: 6

Closed Contracts

MS21001	Los Angeles County MTA	8/30/2019	7/29/2020		\$613,752.87	\$613,752.87	Implement Special Transit Service to Dodge	\$0.00	Yes
MS21003	Orange County Transportation Autho	7/8/2020	5/31/2021		\$468,298.00	\$241,150.48	Provide Express Bus Service to the Orange	\$227,147.52	Yes

Total: 2

Cont.#	Contractor	Start Date	Original End Date	Amended End Date	Contract Value	Remitted	Project Description	Award Balance	Billing Complete?
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FY 2021-2024 Contracts

Open Contracts

MS24001	Los Angeles County MTA	1/26/2023	5/31/2028		\$1,200,248.00	\$0.00	Provide Clean Fuel Bus Service to Dodger S	\$1,200,248.00	No
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Total: 1

Pending Execution Contracts

MS24002	South Pasadena Police Department				\$499,789.00	\$0.00	Procure Zero-Emission Vehicles and Infrastr	\$499,789.00	No
MS24003	Omnitrans				\$315,278.00	\$0.00	Bloomington Microtransit Service Expansion	\$315,278.00	No
MS24004	City of Seal Beach				\$162,891.00	\$0.00	Circuit Transit Shared Mobility	\$162,891.00	No
MS24005	City of Huntington Beach				\$279,186.00	\$0.00	Circuit Transit Rideshare Program	\$279,186.00	No
MS24006	Anaheim Transportation Network				\$322,000.00	\$0.00	Old Towne Orange Microtransit Service	\$322,000.00	No
MS24007	City of Gardena				\$475,312.00	\$0.00	Gtrans Microtransit Service	\$475,312.00	No
MS24008	City of Long Beach				\$410,312.00	\$0.00	Circuit Transit Mobility Transit Expansion Pr	\$410,312.00	No

Total: 7



UPDATE ON RAIL YARD FACILITY BASED MOBILE SOURCE MEASURES

SEPTEMBER 1, 2023 GOVERNING BOARD

RECENT DEVELOPMENT

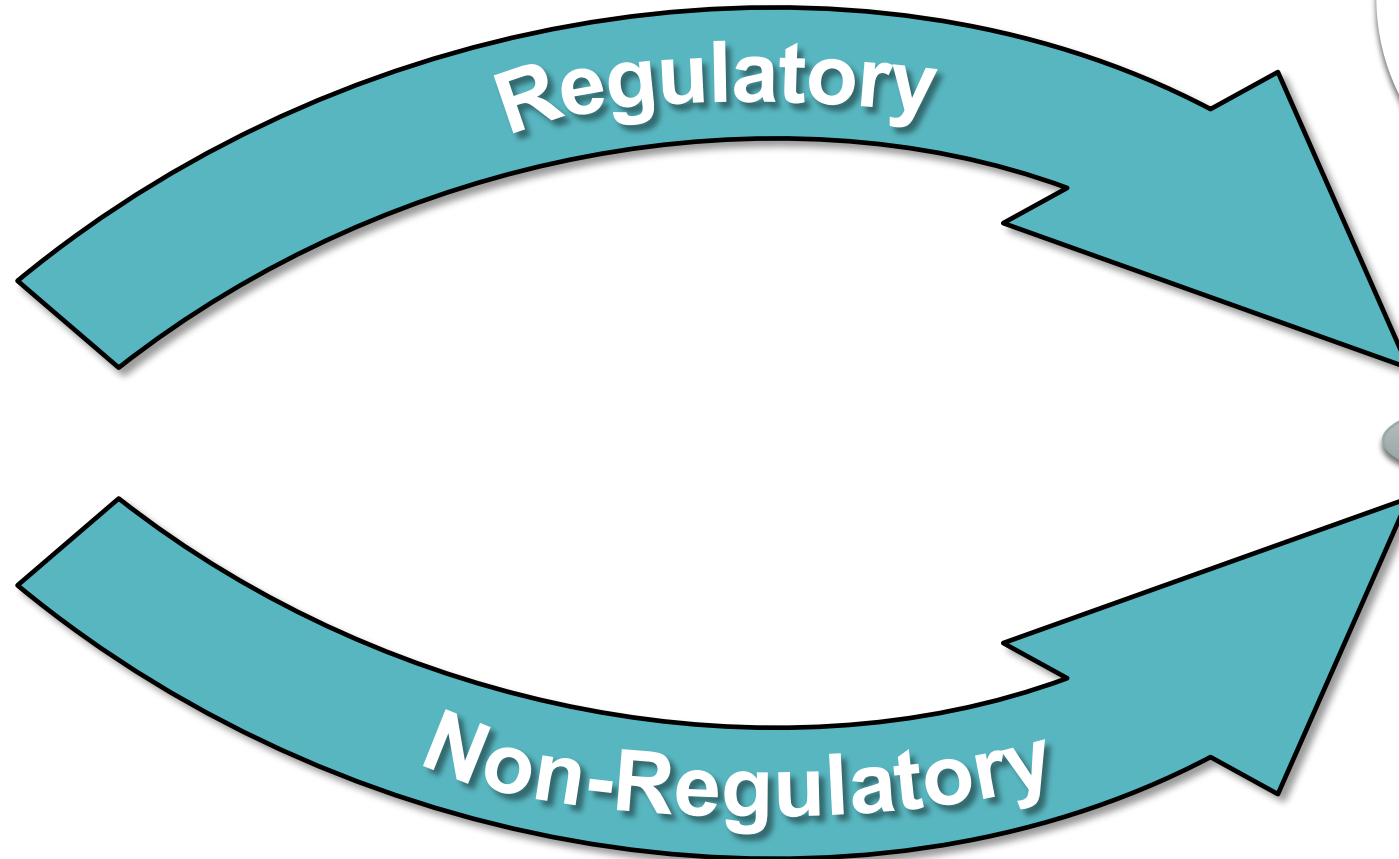
South Coast AQMD staff has been working on Proposed Rule 2306 for new rail yards

CA High Speed Rail Authority announced in June that they will not be moving forward with the proposed Colton freight rail yard project

BNSF and UP recently approached staff to discuss a potential MOU to reduce emissions from new and existing rail operations

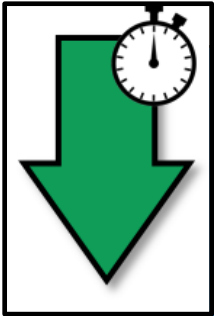
PATHWAYS

Both pathways are consistent with prior Board direction



***Goal:
Reduce air
quality impacts
from railroad
operations***

KEY CONSIDERATIONS TO PURSUE MOU



Reduce emissions as much as possible as quickly possible



Near term air quality/
public health benefit



Track record of fully
executed MOUs



Newly proposed rail
yards cancelled or
paused

WHAT IS AN MOU?

- MOU is an enforceable contract between multiple parties
- Common elements of a MOU include:
 - Description of actions each party must implement
 - Procedures that govern how MOU will be carried out
 - Process/remedies if actions are not completed
- Proposed MOU would be submitted (through CARB) to U.S. EPA to include in State Implementation Plan – similar to a rule or regulation

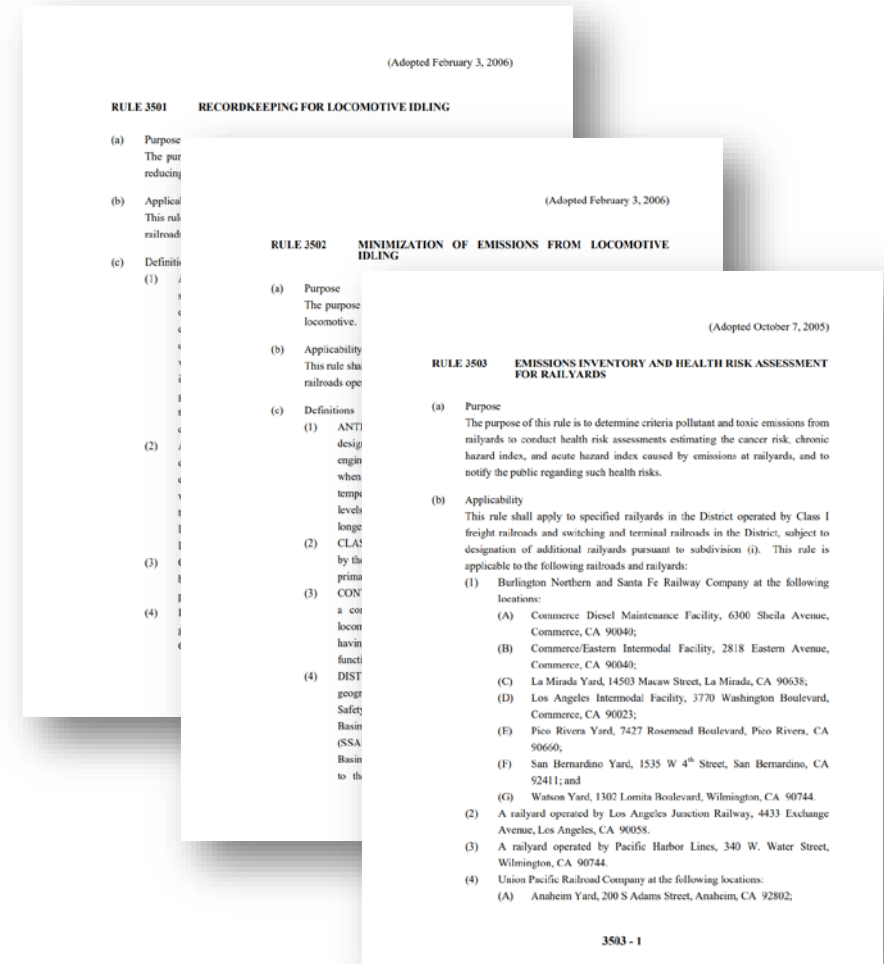
HISTORY OF STATEWIDE RAIL AGREEMENTS

- Two agreements with CARB, BNSF, and UP
 - 1998 Agreement focused on Tier II locomotives for South Coast Air Basin
 - 2005 Agreement focused on idling and health risk for railyards throughout California
- BNSF and UP complied with both agreements
 - Emission reductions from both agreements

More Needed: Emissions are too high to meet federal and state air quality standards and local communities are exposed to elevated health risks

SOUTH COAST AQMD PREVIOUS RAIL ROAD RULES

- In 2005 and 2006 Governing Board adopted three rules for rail operations
 - Rule 3501 – Recordkeeping for Locomotive Idling
 - Rule 3502 – Minimization of Emissions from Locomotive Idling
 - Rule 3503 – Emissions Inventory and Health Risk Assessment for Railroads
- American Association of Railroads (BNSF and UP) sued South Coast AQMD
- After many years of litigation, Rules 3501, 3502, 3503 not enforceable per court order



KEY ELEMENTS UNDER CONSIDERATION FOR MOU



Locomotives
That Stay Within
the South Coast
AQMD



Cargo Handling
Equipment at
Railyards



Zero-Emission
Infrastructure
Plan

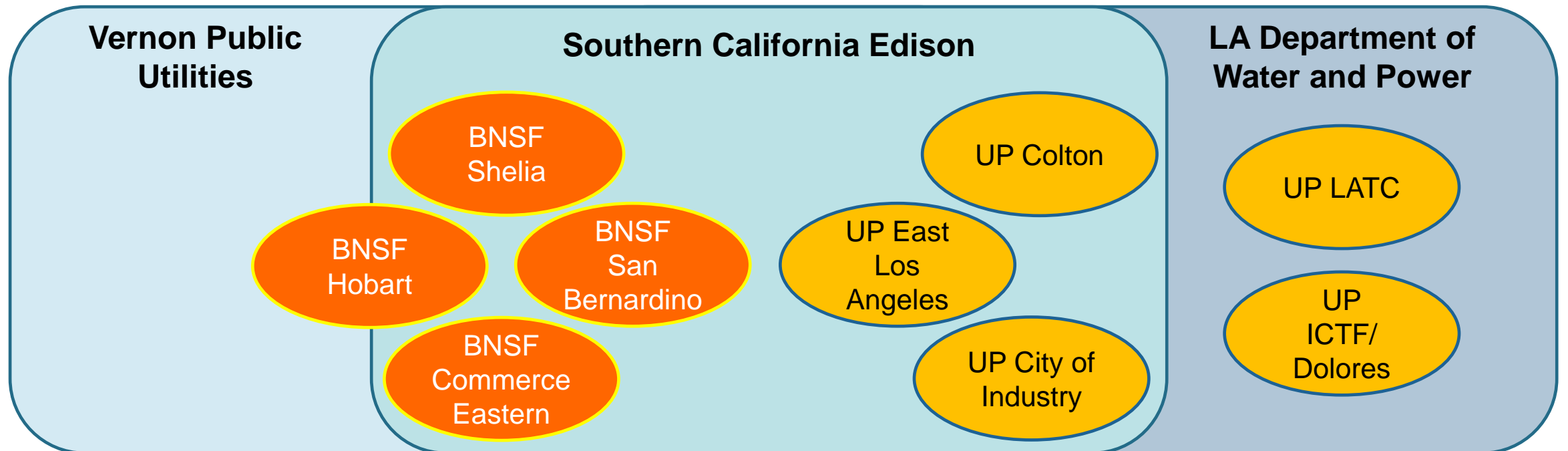


Zero-Emission
Technology
Demonstration

Scope: Includes New and Existing Rail Yards

ROLE OF ENERGY UTILITIES

- Significant infrastructure investments needed to support at-scale ZE implementation for railroad operations
 - Implementation of MOU expected to result in several of largest charging infrastructure projects in the nation
- Close coordination with energy utilities needed to achieve MOU milestones



EXAMPLES OF EMISSIONS BENEFITS

- Example opportunities for emission reductions through proposed MOU:
 - 90% reduction for Tier 4 switcher locomotives that replace Tier 0/0+*
 - 100% reduction for yard trucks that can go to zero emissions**
- Full emissions benefits have not yet been determined, but will be calculated and presented as part of public process

* Approximately 80% of switcher locomotives in the state are Tier 0 / 0+

** More than 95% of yard trucks at rail yards are not yet zero emissions

PRELIMINARY COMPARISON: PROPOSED RULE 2306 & PROPOSED MOU

	Proposed Rule 2306	Proposed MOU
Applies to new rail yards?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Applies to existing rail yards?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Consistent with CARB statewide rules/control strategies for rail operations?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Achieves emission reductions faster than current regulatory approach?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Zero emissions infrastructure included?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Enforceable?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

POTENTIAL OUTCOMES OF PROPOSED MOU PROCESS

MOU Approved

- Both railroads and South Coast AQMD staff agree to terms
 - Staff presents MOU for Board consideration
 - Board approves MOU

No MOU

- One or both railroads don't agree to terms of MOU or back out of MOU process
- South Coast AQMD doesn't agree to terms of MOU or backs out of MOU process
- Both railroads and South Coast AQMD staff agree to terms
 - Staff presents MOU for Board consideration
 - Board does not approve MOU

PROPOSED MOU PUBLIC PROCESS AND

- Public process and stakeholder input critical to development of proposed MOU
 - Prior feedback from ongoing and previous efforts (e.g., PR 2306, AB 617, etc.) help inform current process
- Discussed proposed MOU at:
 - Working Group Meeting on August 17
 - Mobile Source Committee on August 18
- Upcoming community meetings being planned for September:

East Los Angeles

- 9/19/23 @ 5:30 pm
- Obregon Park

Wilmington

- 9/20/23 @ 5:30 pm
- Wilmington Senior Center

Colton

- 9/21/23 @ 5:30 pm
- Colton High School

PRELIMINARY FEEDBACK FROM STAKEHOLDERS

- Community distrust of MOUs and railroads
- Requesting transparency in MOU development
- Concern about process
- Support/advocacy for zero emissions infrastructure and vehicles
- Requests for community benefits as part of MOU
- Need for interim milestones and enforceability

IF MOU IS NOT RECOMMENDED, WHAT HAPPENS NEXT?

- If MOU is not pursued or approved, staff will immediately pivot to Proposed Rule 2306 for new railyards
- Staff will initiate rule development for Proposed Rule 2306.1 for existing railyards

NEXT STEPS

- Receive and incorporate Board feedback
- Continue community engagement
 - In person community meetings (mid-September)
 - Provide draft MOU/staff report for public review and comment (mid-October)
- Report back to Mobile Source Committee

BOARD MEETING DATE: September 1, 2023

AGENDA NO. 34

PROPOSAL: Certify Final Environmental Assessment for Proposed Amended Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities; and Amend Rule 1178.

SYNOPSIS: Proposed Amended Rule 1178 will establish enhanced leak detection and repair requirements and more stringent control requirements on tanks that store crude oil, additional seals for internal floating roof tanks, and a higher control efficiency requirement for emission control systems. The proposed amended rule will also include provisions for true vapor pressure testing and will update reporting and recordkeeping requirements.

COMMITTEE: Stationary Source, June 16, and August 18, 2023, Reviewed

RECOMMENDED ACTIONS:

Adopt the attached Resolution:

1. Certifying the Final Environmental Assessment for Proposed Amended Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities; and
2. Amending Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities.

Wayne Natri
Executive Officer

SR:MK:MM:RC:MG

Background

California Assembly Bill 617 (AB 617) was signed into state law in 2017 and required strategies to reduce toxic air contaminants and criteria pollutants in overburdened communities. During the development of the Wilmington, Carson, West Long Beach (WCWLB) Community Emission Reduction Plan (CERP), community members expressed concern about refinery emissions. Development of PAR 1178 was initiated in response to Chapter 5b, Action 4 in the WCWLB CERP that was adopted by the South Coast AQMD Governing Board on September 6, 2019. Recommendations for proposed

amendments to Rule 1178 included improving leak detection and repair requirements by incorporating advanced leak detection technologies and requiring additional controls.

Public Process

PAR 1178 was developed through a public process. Eight Working Group meetings for PAR 1178 were held on March 17, 2021, July 15, 2021, December 9, 2021, March 24, 2022, July 14, 2022, October 27, 2022, January 5, 2023, and July 6, 2023. Working Group meeting participants included attendees from affected businesses, environmental and community representatives, public agencies, consultants, and other interested parties. A Public Workshop was held on March 1, 2023, where staff presented the proposed amended rule to the general public and stakeholders and solicited comments. An update on PAR 1178 was presented to the Wilmington, Carson, West Long Beach Community Steering Committee Meeting on February 9, 2023. Staff has also held numerous individual meetings regarding PAR 1178 with stakeholders, including facilities and environmental groups to understand specific concerns and how the rule may uniquely affect them. Staff also met with technology and leak detection service providers. In addition, staff conducted 13 site visits to understand facility operations involving storage tanks and the effect of PAR 1178.

Proposal

PAR 1178 establishes enhanced leak detection and repair (LDAR) and more stringent control requirements. This is the first South Coast AQMD rule to require optical gas imaging technology for leak detection. PAR 1178 requires weekly optical gas imaging inspections for tank farms and semi-annual optical gas imaging inspections on individual floating roof tank components. PAR 1178 requires doming for crude oil tanks that are currently exempt from doming requirements. Full implementation for doming will occur in 2038 for most tanks. An alternative doming schedule is proposed for certain facilities that will require full implementation in 2041. PAR 1178 requires secondary seals on all floating roof tanks. Installation of secondary seals will be required the next time the tank is emptied and degassed but no later than 10 years after date of rule adoption. Additionally, PAR 1178 will require more stringent gap requirements for floating roof tanks and increased emission control efficiency of 98 percent by weight for fixed roof tanks. These requirements will be effective immediately. PAR 1178 also establishes additional requirements for true vapor pressure testing, reporting, and recordkeeping.

Emission Reductions

Total VOC emission reductions associated with the implementation of PAR 1178 is 0.82 ton per day from baseline VOC emissions of 1.23 tons per day for sources that are subject to proposed requirements that result in emission reductions. Optical gas imaging inspections will result in 0.45 ton per day of VOC reduction from estimated baseline VOC emissions of 0.49 ton per day. Doming will result in 0.28 ton per day of VOC reduction from estimated baseline VOC emissions of 0.44 ton per day. Floating roof seal requirements will result in 0.02 ton per day of VOC reduction from baseline VOC

emissions of 0.18 ton per day. Increased emission control efficiency for fixed roof tanks will result in 0.07 tons per day of VOC emission reduction from estimated baseline VOC emissions of 0.12 ton per day.

Key Issues

Throughout the rulemaking process, staff has worked with stakeholders to address their comments and have resolved all key issues. One stakeholder expressed concern about the proposed doming schedule requiring full implementation in 2038 stating that removing more than one tank from service to meet the proposed schedule may impact the fuels market. To address this issue, an alternative doming schedule is proposed to allow three additional years to complete doming for facilities meeting certain criteria. Staff is not aware of any remaining key issues.

California Environmental Quality Act

PAR 1178 is considered a “project” as defined by the California Environmental Quality Act (CEQA), and the South Coast AQMD is the designated lead agency. Pursuant to South Coast AQMD’s Certified Regulatory Program (Public Resources Code Section 21080.5 and CEQA Guidelines Section 15251(l); codified in South Coast AQMD Rule 110) and CEQA Guidelines Section 15070, the South Coast AQMD has prepared an Environmental Assessment (EA) for PAR 1178, which is a substitute CEQA document pursuant to CEQA Guidelines Section 15252, prepared in lieu of a Negative Declaration. Implementation of the proposed project is estimated to reduce VOC emissions by 0.82 ton per day, and the Final EA did not identify any environmental topic areas that would be significantly adversely affected by physical modifications resulting from the proposed project. The Final EA is included as an attachment to this Board package (see Attachment H).

Socioeconomic Analysis

PAR 1178 affects owners and operators of storage tanks located at petroleum facilities that emit more than 20 tons of volatile organic compounds per year. PAR 1178 identified 27 facilities in the oil and gas extraction, petroleum products manufacturing, and bulk storage and terminal industries. One facility may qualify as a small business according to the South Coast AQMD’s Rule 102, while none of the affected facilities qualify as small business under South Coast AQMD’s Small Business Assistance Office definition or the 1990 Clean Air Act Amendments definition. Subsequent to the release of Socioeconomic Impact Assessment, three additional facilities were identified as subject to Rule 1178.

The average annual compliance cost of PAR 1178 is estimated to range from \$5.86 to \$7.04 million, depending on the assumed real interest rate (1 to 4 percent). Recurring weekly optical gas imaging inspection costs account for approximately 60 percent of the average annual compliance cost, while domed roof related capital costs account for approximately 38 percent of the average annual compliance cost. The Petroleum and

Coal Products Manufacturing industry will bear most of the costs of PAR 1178, accounting for approximately 53 percent of the total average annual compliance cost.

The implementation of PAR 1178 is expected to have a near-zero annual impact on job counts from 2024 to 2080 when compliance costs are annualized using a 4 percent real interest rate. The small net job impact reflects the fact that some industries are expected to gain a small number of jobs from additional demand and spending for their products and services while others may forgo a small number of jobs as a result of compliance costs. Finally, staff does not expect PAR 1178 to have a significant impact on the competitiveness of both the industries of refinery and bulk storage, and the regional economy.

AQMP and Legal Mandate

PAR 1178 implements strategies identified in the WCWLB CERP to reduce VOC emissions from refineries and partially implements Control Measure FUG-01 that commits to improved leak detection requirements in South Coast AQMD rules. PAR 1178 updates BARCT requirements by establishing more stringent leak detection and repair and control requirements pursuant to Health and Safety Code section 40920.6.

Control Measure FUG-03 – Further Reductions of Fugitive VOC Emissions in the 2012 Final Air Quality Management Plan (AQMP) identified the implementation of advanced leak detection technologies, including optical gas imaging, as a method to reduce the emissions impact from leaks. The 2016 Final AQMP included Control Measure FUG-01 – Improved Leak Detection and Repair to utilize advanced remote sensing technologies to allow for faster identification and repair of leaks from equipment at oil and gas and other facilities that are currently required to maintain a leak detection and repair (LDAR) program. The 2022 Final AQMP also included Control Measure FUG-01 - Improved Leak Detection and Repair to reduce emissions of VOC from fugitive leaks from process and storage equipment.

Implementation and Resource Impacts

Existing staff resources are adequate to implement the proposed amendments.

Attachments

- A. Summary of Proposal
- B. Key Issues and Responses
- C. Rule Development Process
- D. Key Contacts List
- E. Resolution
- F. Proposed Amended Rule 1178
- G. Final Staff Report
- H. Final Environmental Assessment
- I. Socioeconomic Impact Assessment
- J. Board Meeting Presentation

ATTACHMENT A

SUMMARY OF PROPOSAL

Proposed Amended Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities

Applicability

- Removed true vapor pressure applicability threshold

Requirements

- Gaps in the primary seal greater than 1.3 cm cannot exceed 10% of tank circumference and gaps greater than 0.32 cm cannot exceed 30% of tank circumference
- Tanks must be maintained free of visible vapors resulting from a defect in equipment
- Domes required on all crude oil external floating roof tanks except those for which a permit application has been submitted to limit the crude oil true vapor pressure to less than 3 psia within one year from date of adoption
- True vapor pressure testing for external floating roof tanks without domes
- Domes required to be maintained free of gaps and other openings that are not part of the dome design
- Secondary seals required on all floating roof tanks
- Fixed roof tanks required to have 98% by weight emission control

Compliance Schedules

- Facilities with crude oil tanks subject to doming must have a dome installed on one-third of applicable tanks by December 31, 2031, two-thirds of applicable tanks by December 31, 2033, and all applicable tanks by December 31, 2038
- Facilities with 12 or more tanks subject to doming where 5 or more tanks are 260 feet in diameter or larger must have a dome installed on a quarter of applicable tanks by December 31, 2030, half of applicable tanks by December 31, 2036, three-quarters of applicable tanks by December 31, 2040, and all applicable tanks by December 31, 2041
- Crude oil tanks that become subject to doming after date of adoption must have a dome installed within 3 years of becoming subject to the doming requirement
- Starting two years after date of adoption, tanks required to have a secondary seal installed on the date of adoption must have one installed when the tank is next emptied or degassed and no later than 10 years after date of adoption

Monitoring

- Tank farm inspections required at least once every calendar week
- Component inspections required for floating roof tanks at least once every six months

Maintenance

- Tanks found in non-compliance during an inspection with an OGI device must be repaired within three days after the inspection

Record Keeping and Reporting

- Reporting when defect or visible vapors from vapor tight components are identified during a tank farm inspection
- Written records for tank farm and component inspections
- Digital time-stamped recordings of visible vapors requiring reporting identified during tank farm inspections
- True vapor pressure testing for external floating roof tanks without domes
- Allowance for electronic report forms that contain all information required in the Compliance Report Form
- Allowance of electronic submittal of written and electronic inspection and non-compliance reports
- Maintain all records for a minimum of five years

Test Methods and Procedures

- Allowance for ASTM Method D-6377 when correlated to ASTM Method D-323

Exemptions

- Require periodic true vapor pressure testing for tanks exempt from rule requirements based on true vapor pressure of material stored
- Modified exemption from doming for crude oil tanks to require submitting a permit application to limit true vapor pressure of crude to less than 3 psia
- Exemption from OGI inspections when a tank is out of service
- Exemption from certain OGI inspection requirements when required procedure is deemed unsafe

ATTACHMENT B

KEY ISSUES AND RESPONSES

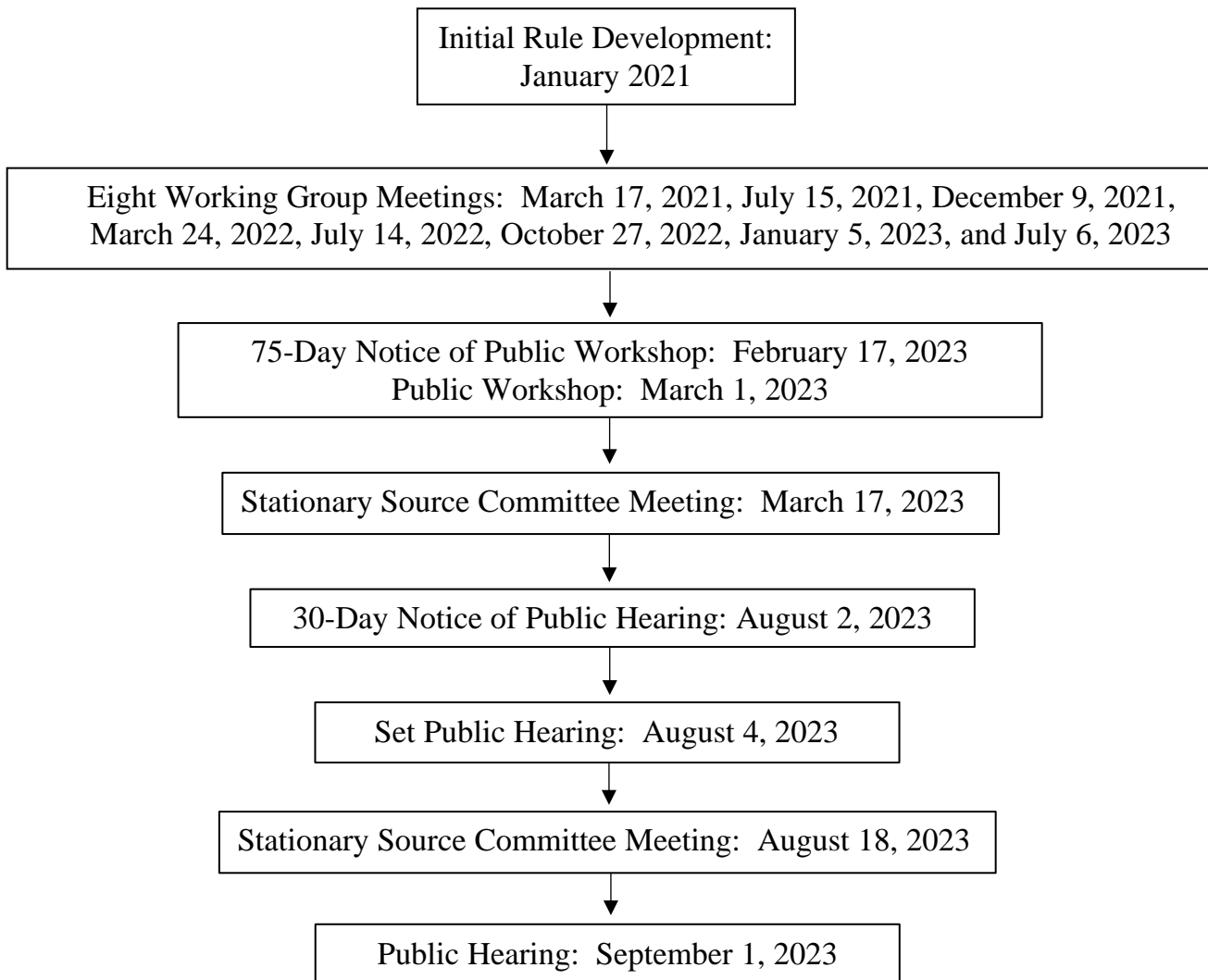
Proposed Amended Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities

Throughout the rulemaking process, staff worked with stakeholders to address their comments and have resolved all key issues. Staff is not aware of any remaining key issues.

ATTACHMENT C

RULE DEVELOPMENT PROCESS

Proposed Amended Rule 1178 – Further Emission Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities



Thirty-three (33) months spent in rule development

Eight (8) Working Group Meetings

One (1) Public Workshop

Two (2) Stationary Source Committee Meetings

ATTACHMENT D

KEY CONTACTS LIST

Altair Paramount, LLC
Center for Biological Diversity
Chevron Products Company
Communities for a Better Environment
Earth Justice
East Yard Communities for Environmental Justice
Equilon Enterprises LLC
Kinder Morgan Liquids Terminal
Marathon Petroleum
Petro Diamond Terminal Company
Phillips 66
R.A. Nichols Engineering
Regulatory Flexibility Group
Sierra Club
Shell Oil Products
Tank and Environmental Technologies
Torrance Refining Company LLC
Ultramar Inc Wilmington Refinery
Valero Energy Corporation
Western States Petroleum Association

ATTACHMENT E

RESOLUTION NO. 23-_____

A Resolution of the Governing Board of the South Coast Air Quality Management District (South Coast AQMD) certifying the Final Environmental Assessment for Proposed Amended Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities.

A Resolution of the South Coast AQMD Governing Board amending Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities.

WHEREAS, the South Coast AQMD Governing Board finds and determines that Proposed Amended Rule 1178 is considered a “project” as defined by the California Environmental Quality Act (CEQA); and

WHEREAS, the South Coast AQMD has had its regulatory program certified pursuant to Public Resources Code Section 21080.5 and CEQA Guidelines Section 15251(l) and has conducted a CEQA review and analysis of the proposed project pursuant to such program (South Coast AQMD Rule 110); and

WHEREAS, the South Coast AQMD Governing Board has determined that the requirements for a Negative Declaration have been triggered pursuant to its Certified Regulatory Program and CEQA Guidelines Section 15070, and that an Environmental Assessment (EA), a substitute document allowed pursuant to CEQA Guidelines Section 15252 and South Coast AQMD’s Certified Regulatory Program, is appropriate; and

WHEREAS, the South Coast AQMD prepared a Draft EA pursuant to its Certified Regulatory Program and CEQA Guidelines Sections 15070 and 15252 setting forth the potential environmental consequences of Proposed Amended Rule 1178 and determined that the proposed project would not have the potential to generate significant adverse environmental impacts; and

WHEREAS, a Draft EA was prepared and circulated for a 30-day public review and comment period from July 19, 2023 to August 18, 2023, and four comment letters were received; and

WHEREAS, the Draft EA has been revised to include the comments received on the Draft EA and the responses, so that it is now a Final EA; and

WHEREAS, it is necessary that the South Coast AQMD Governing Board review the Final EA prior to its certification, to determine that it provides adequate information on the potential adverse environmental impacts that may occur as a result of adopting Proposed Amended Rule 1178, including the responses to the comments received relative to the Draft EA; and

WHEREAS, pursuant to CEQA Guidelines Section 15252 (a)(2)(B), since no significant adverse impacts were identified, no alternatives or mitigation measures are required for project approval; thus, a Mitigation, Monitoring, and Reporting Plan pursuant to Public Resources Code Section 21081.6 and CEQA Guidelines Section 15097, has not been prepared; and

WHEREAS, Findings pursuant to Public Resources Code Section 21081.6 and CEQA Guidelines Section 15091 and Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093 were not prepared because the analysis shows that Proposed Amended Rule 1178 would not have a significant adverse effect on the environment, and thus, are not required; and

WHEREAS, the South Coast AQMD Governing Board voting to adopt Proposed Amended Rule 1178 has reviewed and considered the information contained in the Final EA, including responses to comments, and all other supporting documentation, prior to its certification, and has determined that the Final EA, including the responses to the comments received, has been completed in compliance with CEQA; and

WHEREAS, Proposed Amended Rule 1178 and supporting documentation, including but not limited to, the Final EA, the Final Staff Report, and the Socioeconomic Impact Assessment were presented to the South Coast AQMD Governing Board and the South Coast AQMD Governing Board has reviewed and considered this information, as well as has taken and considered staff testimony and public comment prior to approving the project; and

WHEREAS, the Final EA reflects the independent judgment of the South Coast AQMD; and

WHEREAS, the South Coast AQMD Governing Board finds and determines that all changes made in the Final EA after the public notice of availability of the Draft EA were not substantial revisions and do not constitute significant new information within the meaning of CEQA Guidelines Sections 15073.5 and 15088.5, because no new significant effects and no substantial increase in the severity of an environmental effect were identified that would require new mitigation measures or project revisions to reduce impacts to less than significant levels, and all changes merely clarify, amplify, or make insignificant modifications to the Draft EA, and recirculation is therefore not required; and

WHEREAS, the South Coast AQMD 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)(i) of the Administrative Code), that the modifications to paragraph (c)(46) to include “VOC” to specify the type of vapor referenced in the definition, clause (f)(4)(C)(i) to include “floating roof” to specify the type of tank to which the rule provision applies, paragraph (h)(1) to remove “subparagraph” and add “paragraph” for rule reference accuracy, subparagraph (h)(2)(B) to remove the “s” from “subparagraphs” for rule reference accuracy, paragraph (h)(5) to correct the paragraph number, paragraph (j)(4) to include language to clarify intent of the rule provision, and paragraph (j)(4) to remove “subparagraph” and add “clause” for rule

reference accuracy, since the notice of public hearing was published are clarifications and are not so substantial as to significantly affect the meaning of the proposed amended rule within the meaning of Health and Safety Code Section 40726 because: (a) the changes do not impact emission reductions, (b) the changes do not affect the number or type of sources regulated by the rule, (c) the changes are consistent with the information contained in the notice of public hearing, and (d) the consideration of the range of CEQA alternatives is not applicable because Proposed Amended Rule 1178 does not cause significant impacts and therefore, alternatives are not required; and

WHEREAS, the South Coast AQMD Governing Board has determined that the Socioeconomic Impact Assessment of Proposed Amended Rule 1178 is consistent with the March 17, 1989 Governing Board Socioeconomic Resolution for rule amendment; and

WHEREAS, the South Coast AQMD Governing Board has determined that the Socioeconomic Impact Assessment is consistent with the provisions of Health and Safety Code Sections 40440.8, 40728.5, and 40920.6; and

WHEREAS, the South Coast AQMD Governing Board has determined that Proposed Amended Rule 1178 will result in increased costs to the affected industries, which are considered to be reasonable, with a total annualized cost as specified in the Socioeconomic Impact Assessment of Proposed Amended Rule 1178; and

WHEREAS, the South Coast AQMD Governing Board has actively considered the Socioeconomic Impact Assessment and has made a good faith effort to minimize such impacts; and

WHEREAS, the South Coast AQMD staff conducted a Public Workshop regarding Proposed Rule 1178 on March 1, 2023; and

WHEREAS, Proposed Amended Rule 1178 will be submitted for inclusion into the State Implementation Plan; and

WHEREAS, Health and Safety Code Section 40727 requires that prior to adopting, amending, or repealing a rule or regulation, the South Coast AQMD 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 Final Staff Report; and

WHEREAS, the South Coast AQMD Governing Board has determined that a need exists to adopt Proposed Amended Rule 1178 to implement Best Available Retrofit Control Technology, partially implement Control Measure FUG-01 of the 2022 Final Air Quality Management Plan, and fulfill a commitment contained in the Wilmington, Carson, West Long Beach Community Emission Reduction Plan; and

WHEREAS, the South Coast AQMD Governing Board has determined, pursuant to Health and Safety Code Section 40001(c), that there is a problem that the proposed amended rule will alleviate, namely nonattainment of several federal ozone standards, and the rule will help attain state and federal ambient air quality standards; and

WHEREAS, the South Coast AQMD Governing Board obtains its authority to adopt, amend or repeal rules and regulations from Health and Safety Code Sections 39002, 40000, 40001, 40440, 40441, 40506, 40510, 40522, 40702, 40725 through 40728, 41508, 41510, 41511, and 41700, 42300 et seq. and Federal Clean Air Act Section 116; and

WHEREAS, the South Coast AQMD Governing Board has determined that Proposed Amended Rule 1178 is written or displayed so that its meaning can be easily understood by the persons directly affected by it; and

WHEREAS, the South Coast AQMD Governing Board has determined that Proposed Amended Rule 1178 is in harmony with and not in conflict with or contradictory to, existing statutes, court decisions, or state or federal regulations; and

WHEREAS, the South Coast AQMD Governing Board has determined that Proposed Amended Rule 1178 does not impose the same requirements as any existing state or federal regulations, and the proposed amended rule is necessary and proper to execute the powers and duties granted to, and imposed upon, South Coast AQMD; and

WHEREAS, the South Coast AQMD Governing Board, in adopting Proposed Amended Rule 1178, references the following statutes which the South Coast AQMD hereby implements, interprets, or makes specific: Health and Safety Code Sections 39002, 40001, 40702, 40440(a), 40440(b), 40406, and 40725 through 40728.5; and

WHEREAS, Health and Safety Code Section 40727.2 requires the South Coast AQMD 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 the South Coast AQMD's comparative analysis of Proposed Amended Rule 1178 is included in the Final Staff Report; and

WHEREAS, the Public Hearing has been properly noticed in accordance with all provisions of Health and Safety Code Section 40725 and 40440.5; and

WHEREAS, the South Coast AQMD Governing Board has held a Public Hearing in accordance with all provisions of law; and

WHEREAS, the South Coast AQMD specifies the Planning and Rules Manager overseeing the rule development for Proposed Amended Rule 1178 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

NOW, THEREFORE BE IT RESOLVED, that the South Coast AQMD Governing Board has considered the Final EA for Proposed Amended Rule 1178 together with all comments received during the public review period, and, on the basis of the whole record before it, the South Coast AQMD Governing Board: 1) finds that the Final EA, including the responses to comments, was completed in compliance with CEQA and the South Coast AQMD's Certified Regulatory Program, 2) finds that the Final EA and all supporting documents were presented to the South Coast AQMD Governing Board, whose members exercised their independent judgment and reviewed, considered, and approved the information therein prior to acting on Proposed Amended Rule 1178, and 3) certifies the Final EA; and

BE IT FURTHER RESOLVED, that because no significant adverse environmental impacts were identified as a result of adopting Proposed Amended Rule 1178, Findings, a Statement of Overriding Considerations, and a Mitigation, Monitoring, and Reporting Plan are not required and were not prepared; and

BE IT FURTHER RESOLVED, that the South Coast AQMD Governing Board does hereby adopt, pursuant to the authority granted by law, Proposed Amended Rule 1178 as set forth in the attached, and incorporated herein by reference; and

BE IT FURTHER RESOLVED, that the South Coast AQMD Governing Board requests that Proposed Amended Rule 1178 be submitted into the State Implementation Plan; and

BE IT FURTHER RESOLVED, that the Executive Officer is hereby directed to forward a copy of this Resolution and Proposed Amended Rule 1178 to the California Air Resources Board for approval and subsequent submittal to the U.S. Environmental Protection Agency for inclusion into the State Implementation Plan.

DATE: _____

CLERK OF THE BOARDS

ATTACHMENT F

(Adopted December 21, 2001)(Amended April 7, 2006)(Amended April 6, 2018)
(Amended November 6, 2020)(Amended May 5, 2023)(PAR 1178 September 1, 2023)

RULE 1178 FURTHER REDUCTIONS OF VOC EMISSIONS FROM STORAGE TANKS AT PETROLEUM FACILITIES

(a) Purpose

The purpose of this rule is to further reduce emissions of Volatile Organic Compounds (VOC) from Storage Tanks located at Petroleum Facilities.

(b) Applicability

The rule applies to the following Storage Tanks used to store Organic Liquid located at any Petroleum Facility that emits more than 40,000 pounds (20 tons) per year of VOC as reported in the Annual Emissions Report pursuant to Rule 301 – Permit Fees in any Emission Inventory Year starting with the Emission Inventory Year 2000:-

- (1) Aboveground Storage Tanks with capacity equal to or greater than 75,000 liters (19,815 gallons) storing Organic Liquid ~~with a true vapor pressure greater than 5 mm Hg (0.1 psi) absolute under actual storage conditions;~~ and
- (2) Storage Tanks with a Potential For VOC Emissions of 6 tons per year used in Crude Oil And Natural Gas Production Operations.

(c) Definitions

- (1) ACCESS HATCH is an opening in the roof with a vertical well and a cover attached to it. Access Hatch provides passage for workers and materials through the roof for construction or maintenance.
- (2) AMBIENT TEMPERATURE is the temperature of an Organic Liquid within a Storage Tank that has been influenced by atmospheric conditions only and is not elevated by a non-atmospheric means of heating at the tank which includes but is not limited to steam, hot water, heaters, heat exchangers, tank insulation, or tank jacketing.
- (3) CERTIFIED PERSON is a person who has successfully completed the South Coast AQMD District tank self-inspection program and a South Coast AQMD District approved fugitive emissions compliance inspection program, and who holds a certificate issued by the Executive Officer evidencing that such person is in good standing in this program.

- (4) COMPONENT INSPECTION is monitoring for Visible Vapors with a handheld Optical Gas Imaging Device of a Storage Tank roof and individual components, including but not limited to Roof Openings and Rim Seal Systems, viewable from the tank platform, and ground for components not viewable from the tank platform but viewable at ground level.~~CONTINUOUS SEAL is a seal that forms a continuous closure that completely covers the annular space between the wall of the storage vessel and the edge of the floating roof. A continuous seal may be a vapor mounted, liquid mounted, or metallic shoe seal. A continuous seal may be constructed of fastened segments so as to form a continuous seal.~~
- (5) CRUDE OIL AND NATURAL GAS PRODUCTION OPERATIONS are any operations from a crude oil well to the point of custody transfer to a refinery and any operations from a natural gas well to the natural gas customer.
- (6) DOMED ROOF is a self-supporting fixed roof attached to the top of an Eexternal Ffloating Rroof Ttank to reduce evaporative losses. An External Floating Roof Tank equipped with a Domed Roof is a Domed External Floating Roof Tank.
- (7) EMISSION CONTROL SYSTEM is a combination of capture system(s) and control equipment used to recover, reduce, remove or control the release of VOC to the atmosphere. Such equipment includes, but is not limited to, absorbers, adsorbers, compressors, condensers, incinerators, flares, boilers, and process heaters.
- (8) EMISSION INVENTORY YEAR is the annual emission-reporting period specified by the Annual Emission Reporting (AER) Program requirements for a given year beginning from July 1 of the previous year through June 30 of a given year. ~~For example, emission inventory year 2000 covers the period from July 1, 1999 through June 30, 2000.~~
- (9) EXTERNAL FLOATING ROOF TANK is a Sstorage Ttank with a roof consisting of a double deck or pontoon single deck which rests or floats on the liquid being contained and is not equipped with a fixed roof above the floating roof.
- ~~(10) EXEMPT COMPOUNDS are as defined in Rule 102.~~
- (10+) FACILITY is any equipment or group of equipment or other VOC-emitting activities, which are located on one or more contiguous properties within the South Coast AQMD 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), 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 Ffacility.

(~~112~~) FIXED ROOF SUPPORT COLUMN AND WELL is a column made of round pipe or of structural shape with an irregular cross section that passes through the floating roof via a peripheral vertical well and is used to support the roof of an internal floating roof tank.

(~~123~~) FIXED ROOF TANK is a Sstorage Ttank with a permanently affixed roof)

(~~134~~) FLEXIBLE ENCLOSURE SYSTEM is a VOC emission reduction system made of a VOC impervious material which is resistant to ultraviolet radiation, completely enclosing a Slotted Guidepole and controls the vapor emission pathway from inside the storage vessel through the Guidepole slots to the outside air.

(~~145~~) FUEL GAS SYSTEM is the piping and control system that gathers gaseous stream(s) generated by onsite operations and transports the gaseous stream for sale or for use as fuel gas in combustion devices, or in-process combustion equipment such as furnaces and gas turbines, either singly or in combination.

(~~156~~) GAUGE FLOAT is a device that is used to indicate the level of liquid within the tank. The float rests on the liquid surface and is housed inside a well that is closed by a removable cover.

(~~167~~) GAUGE HATCH/SAMPLE PORT is an opening in the roof that provides access for gauging or sampling. A Gauge Hatch/Sample Port is usually equipped with a closing cover or a funnel and slit-fabric seal to cover the opening.

(~~178~~) GUIDEPOLE is an anti-rotation device that is fixed to the top and bottom of the tank, passing through a well that is equipped with a sliding cover. The Guidepole is used to prevent adverse movement of the roof and subsequent damage to the roof fittings and rim seals, or as access for level gauging or sampling of the liquid stock. The Guidepole can be solid or equipped with slots or holes for gauging purpose.

(~~189~~) INTERNAL FLOATING ROOF TANK is a Sstorage Ttank equipped with a fixed roof and a floating roof which rests on the liquid being contained.

(~~192~~) LADDER AND WELL is a ladder that passes through a well, and is used to access the tank bottom of an Internal Floating Roof Tank.

(~~202~~) LIQUID MOUNTED PRIMARY SEAL is a Pprimary Sseal that is mounted in full contact with the liquid in the annular space between the tank shell and the floating roof.

- (21) MECHANICAL SHOE PRIMARY SEAL is a metallic band attached to the floating roof sliding in contact with the tank shell. The shoes are supported and held against the tank shell by a mechanical device, and are joined together to form a ring. The vapor space between the shoe and the roof is sealed from the atmosphere by a Primary Seal of coated or VOC impervious fabric.
- (22) OPTICAL GAS IMAGING DEVICE is an infrared camera with a detector capable of visualizing gases in the 3.2-3.4 micrometer waveband.
- (23) ORGANIC LIQUID is any liquid containing VOC.
- (24) PETROLEUM FACILITY is any facility primarily engaged in the production, refining, storage, transfer or distribution of crude petroleum or petroleum products as defined in the Standard Industrial Classification for crude petroleum and natural gas (SIC code 1311), petroleum refining (SIC code 2911), petroleum bulk stations and terminals (SIC code 5171), or other related industries (e.g., SIC codes 4226, 4612, 4613, 4923 and 5541).
- (25) POLE FLOAT is a device located inside a Guidepole that floats on the surface of the stored liquid, and is used to indicate the liquid level inside the tank.
- (26) POLE SLEEVE is a device that extends from either the cover or the rim of an opening in a floating roof deck to the outer surface of a pole that passes through the opening.
- (27) POLE WIPER is a seal that extends from either the cover or the rim of an opening in a floating roof deck to the outer surface of a pole that passes through the opening.
- (28) POTENTIAL FOR VOC EMISSIONS means emissions calculated using a generally accepted model or calculation methodology, based on permitted throughput limits or, when permitted throughput limits are not available, based on the maximum throughput in a calendar month, where at least 30 days of production occurred, in years 2019 to 2022.
- (29) PRESSURE-VACUUM VENT is a vent that is used to minimize tank emissions due to breathing effects.
- (30) PRIMARY SEAL is a seal mounted below a Secondary Seal of a Rim Seal System that consists of two seals. A Primary Seal, which is in contact with the floating roof tank shell, can be either Mechanical Shoe, Resilient Filled, or Wiper Type.
- (31) RESILIENT FILLED PRIMARY SEAL is an envelope filled with resilient foam (non-metallic polyurethane) mounted at the rim of the floating roof that makes contact with the shell. ~~A resilient filled nonmetallic primary seal can be liquid-mounted or vapor-mounted.~~

- (32) RIM MOUNTED SECONDARY SEAL is a Ssecondary Sseal mounted on the rim of the floating roof of a Sstorage Ttank. Rim Mmounted Ssecondary Sseals are effective at reducing losses from the Pprimary Sseal fabric.
- (33) RIM SEAL SYSTEM is a closure device between the shell of the Sstorage Ttank and the floating roof edge. A Rrim Sseal Ssystem may consist of two seals, one above the other. The lower seal is referred to as the Pprimary Sseal and the upper seal is referred to as the Ssecondary Sseal.
- (34) RIM VENT is a device consisting of a weighted pallet that rests on a valve seat. Rim Vvents are used to release any excess pressure or vacuum present in the vapor pocket between the seal and the rim area of a floating roof tank.
- (35) ROOF DRAIN is a drain on the roof of a floating roof tank that is used to remove rainwater from the floating roof. There are two types of Rroof Ddrains. A closed Rroof Ddrain removes the rainwater from the surface of the roof through a flexible hose through the stored liquid prior to exiting the tank. With a closed Rroof Ddrain, the rainwater does not come in contact with the liquid stored in the tank. An open Rroof Ddrain is any drain other than the closed Rroof Ddrain. An open Rroof Ddrain is typically used only during an emergency.
- (36) ROOF LEG is a device that holds the floating roof at a predetermined distance from the tank bottom to allow for tank cleaning or repair. There are two types of Rroof Llegs, adjustable or fixed. Fixed legs are attached to the floating roof or hangers suspended from the roof, whereas adjustable legs pass through a well or sleeve, and penetrate the roof.
- (37) ROOF OPENING is any opening through a floating roof of a Sstorage Ttank for any roof fitting including but not limited to Aaccess Hhatch, Ffixed Rroof Ssupport Ccolumn Aand Wwell, Ggauge Ffloat, Ggauge Hhatch, Ssample Pport, Gguidepole, Lladder Aand Wwell, Rrim Vvent, Rroof Ddrain, Rroof Lleg, and Vvacuum Bbreaker, and excluding Rrim Sseal Ssystem.
- (38) SECONDARY SEAL is a seal mounted above the Pprimary Sseal of a Rrim Sseal Ssystem that consists of two seals. Secondary Sseals can be Sshoe Mmounted or Rrim-Mmounted.
- ~~(39) SHOE MOUNTED SECONDARY SEAL is a secondary seal mounted on the primary mechanical shoe. Shoe mounted secondary seals are effective at reducing vapor losses from the gaps between the shoe and the tank shell.~~
- (394) SLOTTED GUIDEPOLE is a Guidepole that has slots or holes through the wall of the Guidepole. The slots or holes allow the stored liquid to flow into the pole at liquid levels above the lowest operating level.

- (40) ~~STORAGE TANK~~ or TANK is a stationary container primarily constructed of non-earthen materials that meets the applicability criteria of this rule.
- (41) TANK FARM INSPECTION is monitoring for Visible Vapors with a handheld Optical Gas Imaging Device of all applicable Storage Tanks at a Facility where the person conducting the inspection views the top of the tank shell, and fixed roof or dome if applicable. Tank Farm Inspections may be conducted from an elevated position and/or from ground level.
- (42) TRUE VAPOR PRESSURE is the vapor pressure of a liquid at actual storage conditions.
- (43) VACUUM BREAKER is a device used to equalize the pressure of the vapor space across the deck as the floating roof is either being landed on or floated off its legs. A ~~V~~vacuum ~~B~~breaker consists of a well with a cover. Attached to the underside of the cover is a guided leg long enough to contact the tank bottom as the floating roof is being landed. When in contact with the tank bottom, the guided leg mechanically lifts the cover off the well.
- (44) ~~VAPOR MOUNTED PRIMARY SEAL~~ is a primary seal that does not come in contact with the liquid in the annular space between the tank shell and the floating roof.
- (45) VAPOR TIGHT CONDITION is a condition that exists when the reading on a portable hydrocarbon analyzer is less than 500 parts per million (ppm), expressed as methane, above background, measured using EPA Reference Method 21.
- (46) VISIBLE GAP is a gap of more than 1/8 inch between any gasket or seal and the opening that it is intended to seal. Visible Ggap for primary and Ssecondary Sseals is a gap that does not meet the requirements specified in subdivision (d).
- (46) VISIBLE VAPORS are any VOC vapors detected with an Optical Gas Imaging Device during a Component or Tank Farm Inspection, when operated and maintained in accordance with manufacturer training, certification, user manuals, specifications, and recommendations.
- (47) VOLATILE ORGANIC COMPOUNDS (VOC) as defined in Rule 102.
- (48) WASTE STREAM TANK is a Sstorage Tank containing at least 75% water by volume, and some liquid waste stream generated in a manner which contains petroleum liquid, emulsified oil, VOC or other hydrocarbons. For the purpose of this rule, Wwaste Sstream Tanks include waste water tanks and recovered oil (or slop oil) tanks.
- (49) ~~WIPER PRIMARY SEAL~~ is a continuous annular blade of flexible material (e.g. rubber, urethane, or foam filled) fastened to a mounting bracket on the deck perimeter that spans the annular rim space and contacts the tank shell. A wiper

~~seal system may consist of a single primary seal, or dual (multiple) seals where one seal is mounted above the other.~~

(d) Requirements

(1) External Floating Roof Tanks

(A) Floating Roof Requirements

~~The owner or~~ No later than July 1, 2003, the operator of an Eexternal Ffloating Rroof Ttank shall:

- (i) Equip each Access Hatch and Gauge Ffloat well with a cover that is gasketed and bolted. The cover shall be closed at all times, with no Visible Gaps, except when the hatch or well must be opened for access.
- (ii) Equip each Gauge Hatch/sample well with a cover that is gasketed. The cover shall be closed at all times, with no Visible Gaps, except when the hatch or well must be opened for access.
- (iii) Gasket or cover each adjustable Rroof Leg with a VOC impervious sock at all times when the roof is floating.
- (iv) Gasket each Rim Vent. Rim Vents shall be closed at all times, with no Visible Gaps, when the roof is floating; and shall be set to open only when the roof is being floated off the Rroof Leg supports or when the pressure beneath the rim seal exceeds the manufacturer's recommended setting.
- (v) Gasket each Vacuum Breaker. Vacuum Breakers shall be closed at all times, with no Visible Gaps, when the roof is floating; and shall be set to open only when the roof is being floated off or is being landed on the Rroof Leg supports.
- (vi) Equip each open floating Rroof Drain with a slotted membrane fabric cover or other device with an equivalent control efficiency that covers at least 90 percent of the area of the opening.
- (vii) Equip each unslotted Guidepole well with a gasketed sliding cover and a flexible fabric sleeve or wiper.
- (viii) Equip each unslotted Guidepole with a gasketed cover at the end of the pole. The cover shall be closed at all times, with no Visible Gaps, except when gauging or sampling.
- (ix) Equip each Slotted Guidepole with the following combination of components:
 - (A) A gasketed cover, a Ppole Wwiper, and a Ppole Ffloat with a wiper or seal; or

- (B) A gasketed cover, a Ppole Wwiper, and a Ppole Ssleeve that shall be extended into the stored liquid; or
- (C) A gasketed cover, a Ppole Wwiper, a Ppole Ssleeve that shall be extended into the stored liquid, and a Fflexible Enclosure System.
- (x) Maintain the Ppole Ffloat in a condition such that it floats within the Guidepole at all times, except when it must be removed for sampling or when the tank is empty. The wiper or seal of the Ppole Ffloat shall be at or above the height of the Ppole Wwiper.
- (xi) An owner or operator that equips the Slotted Guidepole with a Fflexible Enclosure System shall ensure that the Fflexible Enclosure System:
 - (A) Completely encloses the Slotted Guidepole;
 - (B) Is free of holes, tears, slots, or rips; and
 - (C) Is double-clamped tightly at the top of the Guidepole and secured to the tank roof with no Visible Gaps.
- (xii) Cover each Slotted Guidepole opening with a gasketed cover at all times, with no Visible Gaps, except when the cover must be opened for access.
- (xiii) Except for Vacuum Breakers and Rim Vents, ensure that each opening in the external floating roof shall provide a projection below the liquid surface.
- (xiv) Except for Vacuum Breakers, Rim Vents, Roof Drain, and leg sleeves, equip all other openings in the roof with a gasketed cover or seal which is closed at all times, with no Visible Gaps, except when the cover or seal must be opened for access.
- (B) In lieu of complying with the requirements of no Visible Gap in subparagraph (d)(1)(A), the owner or operator of a floating roof tank containing Organic Liquid shall maintain all Roof Openings in a Vapor Tight Condition at all times except during preventive maintenance or repair specified in subdivision (g) of this rule.
- (CB) Rim Seal System Requirements
The owner or~~No later than July 1, 2003,~~ the operator of an Eexternal Floating Roof Tank shall equip the tank with a Rim Seal System meeting the following requirements:
 - (i) The Pprimary Seal shall be a Mechanical Shoe or Liquid Mounted.

- (ii) The Ssecondary Sseal shall be Rim Mmounted and shall not be attached to the Pprimary Sseal.
- (iii) Gaps between the tank shell and the Pprimary Sseal shall not exceed 1.3 centimeters (1/2 inch) for a cumulative length of ~~1030~~ percent of the circumference of the tank, and 0.32 centimeter (1/8 inch) for ~~3060~~ percent of the circumference of the tank. No gap between the tank shell and the Pprimary Sseal shall exceed 3.8 centimeters (1-1/2 inches). No continuous gap between the tank shell and the Pprimary Sseal greater than 0.32 centimeter (1/8 inch) shall exceed 10 percent of the circumference of the tank.
- (iv) Gaps between the tank shell and the Ssecondary Sseal shall not exceed 0.32 centimeter (1/8 inch) for a cumulative length of 95 percent of the circumference of the tank. No gap between the tank shell and the Ssecondary Sseal shall exceed 1.3 centimeters (1/2 inch).
- (v) Mechanical Sshoe Pprimary Sseals shall be installed so that one end of the shoe extends into the stored Organic Liquid and the other end extends a minimum vertical distance of 61 centimeters (24 inches) above the stored Organic Liquid surface.
- (vi) The geometry of the shoe shall be such that the maximum gap between the shoe and the tank shell is no greater than double the gap allowed by the seal gap criteria specified in clause (d)(1)(~~CB~~)(iii) for a length of at least 46 centimeters (18 inches) in the vertical plane above the liquid surface.
- (vii) The Pprimary Sseal envelope shall be made available for unobstructed inspection by the Executive Officer along its circumference. In the case of riveted tanks with Resilient Filled Pprimary Sseals, at least eight such locations shall be made available; for all other types of seals, at least four such locations shall be made available. If the Executive Officer deems it necessary, further unobstructed inspection of the Pprimary Sseal may be required to determine the seal's condition along its entire circumference.
- (viii) The Ssecondary Sseal shall be installed in a way that permits the Executive Officer to insert probes up to 3.8 centimeters (1-1/2 inches) in width to measure gaps in the Pprimary Sseal.

- (ix) There shall be no holes, tears or openings in the Ssecondary Seal or in the Pprimary Seal envelope surrounding the annular vapor space enclosed by the roof edge, seal fabric, and Ssecondary Seal.
 - (x) Except during the preventive maintenance, repair, or inspection periods specified in subdivision (f) and (g) of this rule that do not exceed 72 hours with prior notification to the Executive Officer, both the Pprimary Seal and the Ssecondary Seal shall cover the annular space between the external floating roof and the wall of the Sstorage Tank in a continuous fashion, with no Vvisible Ggaps.
 - (xi) The owner or operator shall use a Rrim Seal System that is identified on the current list of seals approved by the Executive Officer. The owner or operator requesting the use of an alternative Rrim Seal System shall submit a written application including emission test results and analysis demonstrating that the alternative Rrim Seal System is better in performance and has a rim seal loss emission factor that is less than or equal to the current design.
- ~~(C) No later than July 1, 2003, in lieu of complying with the requirement of no visible gap in subparagraph (d)(1)(A), the operator of an external floating roof tank shall maintain all roof openings in a vapor tight condition at all times except during preventive maintenance, repair, or inspection periods specified in subdivision (f) and (g) of this rule.~~
- (D) Tank Condition Requirements
The owner or operator shall maintain the tank in a condition free of Visible Vapors resulting from a defect in equipment as determined pursuant to the schedule and inspection requirements specified in paragraph (f)(4).
- (E) Doming Requirements
The owner or operator shall install a Domed Roof on tanks meeting the following criteria:
- (i) All External Floating Roof Tanks used to store Organic Liquid with a True Vapor Pressure of 3 psia or greater as demonstrated pursuant to subparagraph (d)(1)(F), except for tanks permitted to contain more than 97% by volume crude oil.

(ii) All External Floating Roof Tanks permitted to contain more than 97% by volume crude oil.

(F) Verification of True Vapor Pressure

Effective January 1, 2024, an owner or operator of an External Floating Roof Tank shall demonstrate the True Vapor Pressure of the Organic Liquid stored is less than 3 psia, with one representative sample, at least once every six calendar months pursuant to the requirements of subdivision (i). For facilities that have committed to a testing frequency in writing on or before January 1, 2003, the applicability and compliance verification of Waste Stream Tanks and recovered oil tanks shall be based on a monthly average True Vapor Pressure greater than or equal to 3 psia. The monthly average True Vapor Pressure of waste stream shall be determined based on at least one representative sample or multiple samples collected from the top surface layer that is no deeper than 6 inches at the frequency committed to in writing by the affected Facility.

(G) In lieu of complying with the requirements in subparagraph (d)(1)(E), the owner or operator of a wastewater tank where the conversion to a Domed External Floating Roof Tank may create a hazard due to the accumulation of pyrophoric material, as confirmed by the Executive Officer, shall accept permit conditions to limit the True Vapor Pressure of the Organic Liquid stored in a tank to less than 3 psia.

(2) Domed External Floating Roof Tanks

The owner or operator of a Domed External Floating Roof Tanks shall:

~~(A) Phase I: The operator at any petroleum facility with annual VOC emissions exceeding 40,000 lbs (20 tons) for emission inventory year 2000 shall install domed roofs on all external floating roof tanks that contain organic liquids having true vapor pressure greater than or equal to 3 psia as reported in the Annual Emissions Report pursuant to Rule 301—Permit Fees for the emission inventory year 2000 according to the following schedule:~~

~~(i) At least 1/3 of the tanks subject to this provision by January 1, 2004;~~

~~(ii) At least 2/3 of the tanks subject to this provision by January 1, 2006;~~

~~(iii) All tanks subject to this provision by January 1, 2008.~~

~~(iv) As an alternative to clauses (i) through (iii) above, an operator may submit a compliance plan demonstrating that 75% of the~~

tanks subject to this provision have domes installed by December 31, 2006, and 100% of such tanks shall have domes installed by December 31, 2008. The Executive Officer shall approve any plan which convincingly demonstrates compliance and may impose conditions of approval necessary to assure compliance. The operator shall comply with all provisions and conditions of an approved plan.

- (B) Phase II: For additional external floating roof tanks that are not identified under Phase I but contain organic liquids having true vapor pressure greater than or equal to 3 psia as reported in the Annual Emissions Report pursuant to Rule 301—Permit Fees for any emission inventory year after 2000, the operator who is subject to Phase I shall comply with the requirements specified in subparagraph (d)(2)(A) no later than two years after becoming subject to the rule. In those cases where the two year period falls within Phase I, the operator shall complete the installation of the domes on all Phase II tanks by no later than January 1, 2010, or December 31, 2010 if choosing to comply with the alternative in clause (d)(2)(A)(iv). The applicability and compliance verification of waste stream tanks and recovered oil tanks shall be based on a monthly average true vapor pressure greater than or equal to 3 psia. The monthly average true vapor pressure of waste stream shall be determined based on at least one representative sample or multiple samples collected from the top surface layer that is no deeper than 6 inches at a frequency committed to in writing by the affected facility no later than January 1, 2003. The facility shall monitor and keep records of sampling results and monthly average true vapor pressures on site and make them available to the Executive Officer upon request.
- (C) In lieu of complying with the requirements in subparagraph (d)(2)(B):
- (i) The operator who is subject to Phase I shall accept permit conditions to limit the true vapor pressure of the organic liquids stored in a tank to lower than 3 psia by the end of Phase I.
 - (ii) The operator of a waste water tank where the installation of a domed roof may create a hazard due to the accumulation of pyrophoric material, as confirmed by the Executive Officer, who is subject to Phase II shall accept permit conditions to limit the true vapor pressure of the organic liquids stored in a tank to lower than 3 psia.

- ~~(AD)~~ The operator of a domed external floating roof tank shall ~~E~~equip and maintain all ~~R~~roof ~~O~~openings and Rim Seal Systems and in accordance with the specifications listed in subparagraphs (d)(1)(A) and (d)(1)(C), except for Slotted Guidepoles by the applicable compliance date in subparagraph (d)(2)(A) and (d)(2)(B). Each ~~S~~lotted ~~G~~uidepole shall be equipped with the following combination of components:
- (i) A gasketed cover, a ~~P~~pole ~~W~~wiper, a ~~P~~pole ~~F~~float with a wiper or seal; or
 - (ii) A gasketed cover, a ~~P~~pole ~~W~~wiper, and a pole sleeve that shall be extended into the stored liquid; or
 - (iii) A gasketed cover, a ~~P~~pole ~~W~~wiper, and a flexible enclosure system.
- ~~(E)~~ The operator of a domed external floating roof tank shall equip the tank with a rim seal system consisting of a primary and a secondary seal meeting the specifications listed in subparagraph (d)(1)(B) by the applicable compliance date in subparagraphs (d)(2)(A) and (d)(2)(B).
- ~~(BF)~~ The operator shall ~~E~~ensure that the concentration of organic vapor in the vapor space above ~~the~~ a domed external floating roof ~~does~~ shall not exceed 30 percent of its lower explosive limit (LEL) by the applicable compliance date in subparagraph (d)(2)(A) and (d)(2)(B).
- ~~(C)~~ Comply with the requirements of subparagraph (d)(1)(D).
- ~~(D)~~ Maintain the Domed Roof in a condition that is free of gaps, cracks, punctures, and other openings, except where vents and access points are located.
- ~~(G)~~ The operator shall submit to the Executive Officer an annual status report including at a minimum all of the following:
- (i) A list of all external floating roof tanks subject to the requirement in subparagraphs (d)(2)(A) and (d)(2)(B);
 - (ii) A general description of each tank including information such as tank identification, District permit number or District device identification, tank type, tank capacity, type of liquid stored, and if applicable, number of representative samples, frequency of sampling, averaging method used to determine the monthly average true vapor pressure of waste stream or recovered oil tanks, and the results.
 - (iii) A compliance status for each tank; and

- (iv) ~~An estimated compliance date for each external floating roof tank that is not yet in compliance with the requirement in subparagraph (d)(2)(A) and (d)(2)(B).~~

(3) Internal Floating Roof Tanks

The owner or operator of an Internal Floating Roof Tank shall:

~~When an internal floating roof tank is scheduled for emptying and degassing, but no later than January 1, 2007, the operator of an internal floating roof tank shall:~~

- (A) Equip each Fixed Roof Support Column And Well with a sliding cover that is gasketed or with flexible fabric sleeves;
- (B) Equip each Ladder Well with a gasketed cover. The cover shall be closed at all times, with no Visible Gaps, except when the well must be opened for access;
- (C) Equip and maintain other Roof Openings according to the specifications listed in subparagraph (d)(1)(A) or (d)(1)(~~B~~C). Each Slotted Guidepole shall be equipped with the following combination of components:
 - (i) A gasketed cover, a Pole Wwiper, a Pole Float with a wiper or seal; or
 - (ii) A gasketed cover, a Pole Wwiper, and a Pole Ssleeve that shall be extended into the stored liquid; or
 - (iii) A gasketed cover, a Pole Wwiper, and a flexible enclosure system.
- (D) Equip the tank with a Rim Seal System consisting of ~~either a Pprimary Seal, or a Pprimary and a Ssecondary Seal~~ meeting the specifications listed in subparagraph (d)(1)(~~C~~B), with the exception of a Mechanical Shoe Pprimary Seal which shall have one end extend a minimum vertical distance of 15 centimeters (6 inches) above the liquid surface and the other end extend into the liquid a minimum of 10 centimeters (4 inches); and
- (E) Ensure that the concentration of organic vapor in the vapor space above the ~~internal floating roof~~ does~~shall~~ not exceed 50 percent of its lower explosive limit (LEL) for those installed prior to June 1, 1984 and 30 percent of its LEL for those installed after June 1, 1984.
- (F) Comply with the requirements of subparagraph (d)(1)(D).

(4) Fixed Roof Tanks

- (A) ~~No later than January 1, 2007, The~~ owner or operator of a Fixed Roof Tank shall equip each Fixed Roof Tank with an Emission Control System meeting the following requirements:
- (i) ~~Vent tank emissions to a Fuel Gas System, or vent tank emissions to an The tank emissions are vented to an~~ Emission Control System with an overall control efficiency of at least 985% by weight or the tank emissions are vented to a fuel gas system.
 - (ii) Any tank gauging or sampling device on a tank shall be equipped with a vapor tight cover which shall be closed at all times, with no ~~V~~ visible Gaps, except during gauging or sampling. The roof of such tank shall be properly maintained in a ~~V~~ vapor Ttight ~~C~~ condition with no holes, tears or uncovered opening.
 - (iii) All openings on the roof shall be properly installed and maintained in a ~~V~~ vapor Ttight ~~C~~ condition at all times.
 - (iv) ~~The operator shall Equip~~ each Fixed Roof Tank with Pressure-~~V~~ vacuum Vvents that shall be set to the lesser of 10% below the maximum allowable working pressure of the roof or 0.5 psig.
 - (v) ~~The operator shall M~~ aintain Pressure-~~V~~ vacuum Vvents in a ~~V~~ vapor Ttight ~~C~~ condition at all times except when the operating pressure of the ~~F~~ ixed Roof ~~T~~ ank exceeds the manufacturer's recommended setting.
- (B) In lieu of complying with the requirement in subparagraph (d)(4)(A), the ~~owner or operator may choose to convert the Fixed Roof Tank to an~~ owner or operator may choose to convert the Fixed Roof Tank to an External Floating Roof Tank, a Domed External Floating Roof Tank or an Internal Floating Roof Tank meeting the requirements specified in paragraphs (d)(1), (d)(2) or (d)(3).
- (C) The owner or operator shall comply with the requirements of subparagraph (d)(1)(D).
- (5) Compliance Schedules
The ~~owner or operator of any petroleum facility with annual VOC emissions exceeding 40,000 lbs (20 tons) for any emission inventory year subsequent to 2000 reporting pursuant to Rule 301 Permit Fees Storage Tank that becomes~~ owner or operator of any petroleum facility with annual VOC emissions exceeding 40,000 lbs (20 tons) for any emission inventory year subsequent to 2000 reporting pursuant to Rule 301 Permit Fees Storage Tank that becomes ~~subject to this rule or requirements of this rule on or after [Date of Adoption]~~ subject to this rule or requirements of this rule on or after [Date of Adoption] shall meet the following compliance schedules:
- (A) The owner or operator of a Facility that becomes subject to this rule after [Date of Adoption] shall: ~~Comply with the requirements for external~~

~~floating roof tanks specified in paragraph (d)(1) no later than one year after becoming subject to this rule.~~

- (i) Comply with the requirements for External Floating Roof Tanks specified in paragraph (d)(1), except for subparagraph (d)(1)(E) no later than one year after becoming subject to this rule.
- (ii) Comply with the requirements of subparagraph (d)(1)(E) no later than two years after becoming subject to the requirement.
- (iii) Comply with the requirements for Internal Floating Roof Tanks specified in paragraph (d)(3) when the tanks are scheduled for emptying and degassing, but no later than five years after becoming subject to this rule.
- (iv) Comply with the requirements for Fixed Roof Tanks specified in paragraph (d)(4) no later than five years after becoming subject to this rule.

(B) The owner or operator shall install a Domed Roof on any Storage Tanks under common ownership permitted to contain more than 97% by volume crude oil that become subject to the doming requirements of subparagraph (d)(1)(E) upon [Date of Adoption], in accordance with the following schedule:~~Comply with the requirements for domed external floating roof tanks specified in paragraph (d)(2) no later than six years after becoming subject to this rule . Any external floating roof tank that later becomes subject to this requirement based on any subsequent emission inventory year, shall comply with the requirements in paragraph (d)(2) no later than two years after becoming subject to this rule.~~

- (i) No later than December 31, 2031 for at least 1/3 of the applicable Storage Tanks; and
- (ii) No later than December 31, 2033 for at least 1/2 of the applicable Storage Tanks; and
- (iii) No later than December 31, 2038 for all of the applicable Storage Tanks.

(C) In lieu of meeting the compliance schedule specified in subparagraph (d)(5)(B), the owner or operator of a Facility containing 12 or more tanks permitted to contain more than 97% by volume crude oil located at a single location where five or more tanks are 260 feet in diameter or larger, shall install a Domed Roof pursuant to the following compliance schedule:

- (i) No later than December 31, 2030 for at least 1/4 of the applicable Storage Tanks; and
 - (ii) No later than December 31, 2036 for at least 1/2 of the applicable Storage Tanks; and
 - (iii) No later than December 31, 2040 for at least 3/4 of the applicable Storage Tanks; and
 - (iv) No later than December 31, 2041 for all of the applicable Storage Tanks.
 - (DC) The owner or operator of an External Floating Roof Tank permitted to contain more than 97% by volume crude oil with a True Vapor Pressure of less than 3 psia that becomes subject to the doming requirements of subparagraph (d)(1)(E) after [Date of Adoption], after a test demonstrates that the True Vapor Pressure of the crude oil is 3 psia or greater, shall comply with subparagraph (d)(1)(E) no later than 3 years after becoming subject the requirement. ~~Comply with the requirements for internal floating roof tanks specified in paragraph (d)(3) when the tanks are scheduled for emptying and degassing, but no later than five years after becoming subject to this rule.~~
 - (ED) The owner or operator of an Internal Floating Roof Tank not equipped with a Secondary Seal shall comply with the requirements of subparagraph (d)(3)(D) when the tank is next emptied or degassed, or prior to refilling for any tank that is out of service, beginning 2 years after [Date of adoption]. The owner or operator shall install a Secondary Seal no later than 10 years after [Date of Adoption]. ~~Comply with the requirements for fixed roof tanks specified in paragraph (d)(4) no later than five years after becoming subject to this rule.~~
 - ~~(6) The operator of all tanks for which a permit to construct and operate has been issued by the Executive Officer on and after January 1, 2002 for new construction shall comply with the requirements of subdivision (d).~~
 - (e) Identification Requirements
 - (1) The owner or operator shall permanently identify all tanks subject to the requirements of this rule by a visible sign that includes the tank number, on the outside wall of the tank for inventory, inspection and record keeping purposes.
 - (2) The owner or operator shall notify the Executive Officer of any change(s) in tank identification.
 - (f) Monitoring Requirements
 - (1) External Floating Roof Tanks

To demonstrate compliance with paragraph (d)(1), the operator shall have a Certified Person conduct the following in accordance with the procedures and guidelines specified in Attachment A:

- (A) Conduct an EPA Method 21 inspection or measure gaps of all Roof Openings on a semiannual basis and each time the tank is emptied and degassed.
- (B) Perform complete gap measurements of the Rim Seal System on a semiannual basis and each time the tank is emptied and degassed.

(2) **Domed External Floating Roof Tanks and Internal Floating Roof Tanks**

To demonstrate compliance with paragraph (d)(2) and (d)(3), the owner or operator shall have a Certified Person conduct the following in accordance with the procedures and guidelines specified in Attachment A:

- (A) Visually inspect the Rim Seal System and Roof Openings and use an explosimeter to measure the lower explosive limit (LEL) on a semiannual basis.
- (B) Perform complete gap measurements of the Rim Seal System each time the tank is emptied and degassed but no less than once every ten years.
- (C) Perform complete gap measurements of all Roof Openings each time the tank is emptied and degassed but no less than once every ten years.

(3) **Fixed Roof Tanks**

- (A) No later than 180 days after the effective date of the requirements, the owner or operator of a Facility who elects to install an Emission Control System to comply with the requirements in clause (d)(4)(A)(i) shall conduct an initial performance testing to determine the overall efficiency of the Emission Control System and submit a complete test report to the Executive Officer. The performance testing of the Emission Control System shall be repeated when the system is modified or an operating parameter is changed in a manner that affects the capture or control efficiency. In such case, the performance test shall be conducted and the test report submitted to the Executive Officer within 180 days after the modification. Subsequent to the initial performance test, the operator shall conduct annual performance tests, and shall monitor and record applicable operating parameters on a weekly basis to ensure that the Emission Control System is achieving 985% overall control efficiency.

- (B) To demonstrate compliance with clauses (d)(4)(A)(ii), (d)(4)(A)(iii) and (d)(4)(A)(v), the owner or operator shall have a Certified Person conduct EPA Method 21 measurements on a quarterly basis.
- (C) To demonstrate compliance with clause (d)(4)(A)(iv), the operator shall keep engineering data sheet for Pressure-Vacuum Vents installed after January 1, 2002.

(4) Optical Gas Imaging Inspections

Effective July 1, 2024, the owner or operator shall demonstrate compliance with subparagraphs (d)(1)(D), (d)(2)(C), (d)(3)(F) and (d)(4)(C), by conducting OGI inspections in accordance with the following requirements:

(A) The person conducting an OGI inspection shall:

- (i) Complete a manufacturer's certification or training program for the OGI Device used to conduct the inspection; and
- (ii) Operate and maintain the OGI Device in accordance with the manufacturer's specifications and recommendations.

(B) Tank Farm Inspections

A person meeting the requirements of subparagraph (f)(4)(A) shall:

- (i) Conduct a Tank Farm Inspection at least once every calendar week; and
- (ii) When Visible Vapors are detected from a tank, conduct an inspection from the tank's platform to identify components and/or equipment emitting Visible Vapors.

(A) If determined that Visible Vapors are emitted from components required to be maintained in a Vapor Tight Condition or in a condition with no Visible Gaps, the owner or operator shall make necessary repairs or adjustments pursuant to subdivision (g), or demonstrate compliance with a Vapor Tight Condition or a condition with no Visible Gaps for the component from which Visible Vapors are emitted within 3 days.

(B) If determined that Visible Vapors are emitted from equipment not specified in subclause (f)(4)(B)(ii)(A), a visual inspection for defects in equipment shall be conducted, which may include the use of the OGI Device. The owner or operator shall make necessary repairs or adjustments pursuant to subdivision (g) for any defects identified.

(iii) If, during an inspection of a tank conducted pursuant to clause (f)(4)(B)(i), Visible Vapors are detected and no repairs or demonstrations were required pursuant to clause (f)(4)(B)(ii), an owner or operator is not required to conduct inspections required by clause (f)(4)(B)(ii) for that tank for the following weeks within that calendar month provided the inspector:

(A) Records the Visible Vapors detected during the Tank Farm Inspection; and

(B) Makes a determination that there are no visually identifiable departures indicating an increase in Visible Vapors by comparing the Visible Vapors detected during subsequent Tank Farm Inspections in the same calendar month to the Visible Vapors recorded pursuant to subclause (f)(4)(B)(iii)(A). Departures may include, but are not limited to, increases in the size, density, flowrate, or number of Roof Openings from which Visible Vapors are emitted.

(C) Component Inspections

A person that meets the requirements of subparagraph (f)(4)(A) shall:

(i) Conduct a Component Inspection for each floating roof tank at least once every six months; and

(ii) When Visible Vapors are detected, and are not emitted from the Rim Seal System, the owner or operator shall make any necessary repairs or adjustments pursuant to subdivision (g), or demonstrate compliance with the applicable rule requirements for the components or equipment from which Visible Vapors are detected within 3 days; and

(iii) When the Visible Vapors are detected from the Rim Seal System, the owner or operator shall identify any defects in the equipment and make any necessary repairs or adjustments pursuant to subdivision (g). If no defects are identified, an inspection from ground level shall be conducted. If Visible Vapors are detected at the top of the tank shell or roof vents, the owner or operator shall demonstrate compliance with the Rim Seal requirements of this rule, or make any necessary repairs, within 3 days.

(g) Maintenance Requirements

The owner or operator shall maintain tanks in accordance with the following requirements:

- (1) Repair, or replace any piping, valves, vents, seals, gaskets, or covers of Roof Openings that are found to have defects or Visible Gaps, or are not in a Vapor Tight Condition and do not meet all the requirements of this rule before filling or refilling an emptied and degassed Storage Tank, or within 72 hours after an inspection, including one conducted by the operator as specified in paragraphs (f)(1) through (f)(3), determines that the equipment is not operating in compliance.
- (2) Make any necessary repairs or adjustment on tanks found in non-compliance during an inspection required by paragraph (f)(4) within 3 days after the inspection.

~~The operator shall repair, or replace any piping, valves, vents, seals, gaskets, or covers of roof openings that are found to have defects or visible gaps, or are not vapor tight and do not meet all the requirements of this rule before filling or refilling an emptied and degassed storage tank, or within 72 hours after an inspection, including one conducted by the operator as specified in subdivision (f), determines that the equipment is not operating in compliance.~~

(h) **Record Keeping and Reporting Requirements**

- ~~(1) During the inspections specified subdivision (f), the operator~~For inspections required by ~~sub~~paragraphs (f)(1) through (f)(3), the owner or operator shall; keep records of all findings, including but not limited to the readings measured according to EPA Reference Test Method 21.
- ~~(2) The operator shall record all inspections of primary, secondary seals, a flexible enclosure system (if any), and roof openings on compliance inspection report forms approved by the Executive Officer as described in Attachment A.~~
- ~~(3) The operator shall submit all inspection reports and documents to the Executive Officer semiannually within five working days of completion of the inspections specified in paragraph (f)(1) and (f)(2); and on January 31 and July 31, respectively, upon the completion of two consecutive quarterly inspections conducted as specified in subparagraph (f)(3)(B).~~
 - (A) Keep records of all findings, including but not limited to the readings measured according to EPA Reference Test Method 21;
 - (B) Record all inspections of Primary Seals, Secondary Seals, a Flexible Enclosure System (if any), and Roof Openings on compliance inspection report forms approved by the Executive Officer as described in Attachment A. An owner or operator may use an electronic compliance

- inspection report form provided that all required information specified in Appendix A is contained in the electronic report form; and
- (C) Submit all inspection reports and documents to the Executive Officer semi-annually within five working days of completion of the inspections specified in paragraphs (f)(1) and (f)(2); and on January 31 and July 31, respectively, upon the completion of two consecutive quarterly inspections conducted as specified in subparagraph (f)(3)(B). Inspection reports may be submitted electronically to the email address designated by the Executive Officer.
- (2) For OGI inspections required by subparagraph (f)(4), the owner or operator shall:
- (A) Report Visible Vapors detected during a Tank Farm Inspection requiring a demonstration with rule requirements or a repair pursuant to clause (f)(4)(B)(ii) to the Executive Officer by phone (1-800-CUT-SMOG or 1-800-288-7664) within 24 hours after the inspection is completed;
- (B) Keep written records and digital recordings of Visible Vapors detected during a Tank Farm Inspection resulting from a defect or emitted from a component required to be maintained in a Vapor Tight Condition or a condition with no Visible Gaps. Written records shall include tank identification, date of inspection, and findings. Findings shall include identification of tanks from which Visible Vapors were identified and any repairs or determinations made pursuant to subparagraphs (f)(4)(B). Digital recordings shall be accurately time-stamped and capture the Visible Vapors for a minimum of 5 seconds; and
- (C) Keep written records of Component Inspections that include tank identification, date of inspection and findings. Findings shall include identification of Storage Tanks from which Visible Vapors were identified, any repairs or determinations made pursuant to subparagraph (f)(4)(C).
- (34) If the owner or operator determines that a tank is in violation of the requirements of this rule during the inspections specified subdivision (f), the owner or operator shall submit a written report to the Executive Officer within 5 calendar days~~20 hours~~ of the determination of non-compliance, indicating corrective actions taken to achieve compliance. Written reports may be submitted electronically to the email address designated by the Executive Officer.
- (45) The owner or operator who elects to install or modify an Emission Control System to comply with the requirement in clause (d)(4)(A)(i) shall conduct an initial performance test as described in ~~clause~~ subparagraph (f)(3)(A) and submit

a complete test report to the Executive Officer no later than 180 days after the effective date of the requirement for new installation; or 180 days after the modification. Subsequent annual performance test and test report shall be submitted annually within 60 days after the end of each Emission Inventory Year.

(56) The owner or operator shall keep all required records for monitoring, inspection, maintenance, and repair records, sampling results, and type of Organic Liquid stored at the Facility for a period of five years and shall make the records available to the Executive Officer upon request.

(i) Test Methods and Procedures

The following test methods and procedures shall be used to determine compliance with this rule. Alternative test methods may be used if they are determined to be equivalent and approved in writing by the Executive Officer, the California Air Resources Board, and the U.S. Environmental Protection Agency.

- (1) Measurements of gaseous Volatile Organic Compound leaks shall be conducted according to EPA Reference Method 21 using an appropriate analyzer calibrated with methane.
- (2) Organic Liquids that are stored at Ambient Temperatures with a True Vapor Pressure of greater than 5 mm Hg (0.1 psi) absolute under actual storage conditions shall be determined as those with a flash point of less than 100 °F as determined by ASTM Method D-93.
- (3) Organic Liquids that are stored at above Ambient Temperatures with a True Vapor Pressure greater than 5 mm Hg (0.1 psi) absolute under actual storage conditions shall be determined as those whose volume percent evaporated is greater than ten percent at an adjusted temperature T_{Adj} as determined by ASTM Method D-86 of:

$$T_{Adj} = 300 \text{ }^\circ\text{F} + T_1 - T_a$$

Where:

T_1 = Liquid Storage Temperature (°F)

T_a = Ambient Temperature (°F) = 70 °F

- (4) ~~Organic liquids with a~~ The True Vapor Pressure of Organic Liquid greater than or equal to 3 psia shall be determined by ASTM Method D-323 for Reid Vapor Pressure, or ASTM Method D-6377 correlated to ASTM D-323, and converted to True Vapor Pressure using applicable nomographs in EPA AP-42 or South Coast AQMD District and EPA approved nomographs. The actual storage temperature used for

determining TTrue Vvapor PPressure shall be 70 degrees Fahrenheit for Organic Liquids that are stored at Ambient Temperatures, and actual storage temperature for Organic Liquids that are stored at above Ambient Temperatures.

- (5) Control efficiency of an Emission Control System, on a mass emissions basis, and the VOC concentrations in the exhaust gases shall be determined by U.S. EPA Test Methods 25, 25A; South Coast AQMD~~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.
- (6) When more than one test method or set of test methods are specified for any testing, the application of these methods to a specific set of test conditions is subject to approval by the Executive Officer. In addition, a violation of any requirement of this rule established by any one of the specified test methods or set of test methods shall constitute a violation of the rule.
- (7) The sampling, analysis, and reporting shall be conducted by a laboratory that has been approved under the South Coast AQMD~~District~~ Laboratory Approval Program (LAP) for the cited South Coast AQMD~~District~~ reference test methods, where LAP approval is available. For South Coast AQMD~~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 South Coast AQMD~~District~~ reference test method.
- (8) Tests to determine emission factors for an alternative control device for rim seal or deck opening shall accurately simulate conditions under which the device will operate, such as wind, temperature, and barometric pressure. Test methods that can be used to perform the testing required in this paragraph include, but are not limited to, the following methods, which shall be performed by a laboratory certified by American Petroleum Institute (API):
 - (A) API Manual of Petroleum Measurement Standards, Chapter 19, Section 3, Part A, Wind Tunnel Test Method for the Measurement of Deck-Fitting Loss Factors for External Floating-Roof Tanks;

- (B) API Manual of Petroleum Measurement Standards, Chapter 19, Section 3, Part B, Air Concentration Test Method for the Measurement of Rim Seal Loss Factors for Floating-Roof Tanks.
- (C) API Manual of Petroleum Measurement Standards, Chapter 19, Section 3, Part E; Weight Loss Test Method for the Measurement of Deck-Fitting Loss Factors for Internal Floating-Roof Tanks.

(j) Exemptions

- (1) The provisions of this rule shall not apply to pressurized Sstorage Tanks designed to operate in excess of 15 pounds per square inch gauge (psig) without any emissions to the atmosphere except under emergency conditions.
- (2) ~~Domed external floating roof tanks installed prior to January 1, 2002 shall be exempt from the requirements of subparagraph (d)(2)(D) and (d)(2)(E) for secondary seals.~~
- (3) ~~Any facility with a facility emission cap equal to or less than 40,000 pounds (20 tons) per year of VOC shall be exempt from the requirements of this rule.~~
- (24) Portable Baker tanks containing Organic Liquids having True Vapor Pressures from 0.1 psia to 0.5 psia equipped with carbon canisters to reduce the emissions from the Sstorage Tanks to less than 500 ppm outlet concentration shall be exempt from the performance testing requirements specified in clause (d)(4)(A)(i) and subparagraph (f)(3)(A) provided that the operator conducts EPA Reference Method 21 measurement weekly to ensure that the system achieves the emission standard of 500 ppm.
- (35) External Floating Roof tanks having permit conditions that limit the True Vapor Pressure of the Organic Liquids stored in the tanks to ~~less~~ er than 3 psia shall be exempt from the requirements of ~~clause~~ paragraph (d)(~~12~~)(E)(i) provided that the True Vapor Pressure of the Organic Liquid is less than 3 psia as demonstrated pursuant to subparagraph (d)(1)(F).
- (46) Except for Storage Tanks ~~with that do not have~~ a Potential For VOC Emissions of 6 tons per year or greater used in Crude Oil And Natural Gas Production Operations, tanks ~~and are~~ storing Organic Liquid with a True Vapor Pressure equal to or less than 5 mm Hg (0.1 psia) under actual storage conditions ~~shall be~~ are exempt from the requirements of this rule, provided the owner or operator demonstrates that the Organic Liquid stored has a True Vapor Pressure of 5 mm Hg (0.1 psia) or less under actual storage conditions with a method specified in a permit condition, or with the appropriate test method specified in subdivision (i) pursuant to subparagraphs (j)(4)(A) and (j)(4)(B), with the first test conducted no later than July 1, 2024 or within one month from refilling a tank that is out of

~~service after July 1, 2024. External floating roof tanks subject to clause (d)(1)(A)(i) shall be exempt from this requirement until the next time the tank is emptied and degassed, provided that the operator has demonstrated to the satisfaction of the Executive Officer that in order to properly bolt, the covers for access hatches and gauge float wells must be welded. The operator shall use equivalent means, such as clamping, to secure the covers during the interim period.~~

(A) Test every 5 years for tanks storing refined Organic Liquid meeting specifications for sale; and

(B) Test annually for tanks storing an Organic Liquid that does not meet the criteria requirements of subparagraph (j)(4)(A).

If the Organic Liquid stored is not an Organic Liquid intended to have a True Vapor Pressure of 0.1 psia or less at the time testing is required, the owner or operator shall test the True Vapor Pressure when the tank is refilled with an Organic Liquid intended to have a True Vapor Pressure of 0.1 psia or less within one month from refilling. The owner or operator shall, for a minimum of five years, keep records on the type of Organic Liquid stored with its corresponding dates of storage, and the results of all tests conducted pursuant to this paragraph.

(57) External floating roof tanks permitted to contain more than 97% by volume crude oil shall be exempt from the doming requirements of ~~clausesubparagraphparagraph (d)(12)(E)(ii) and (d)(2)(B)~~ provided that a permit application is submitted to the Executive Officer no later than one year from [Date of Adoption] to limit the True Vapor Pressure of the crude oil stored to less than 3 psia but shall comply with other remaining applicable requirements of this rule and the True Vapor Pressure of the crude oil stored is less than 3 psia as demonstrated pursuant to subparagraph (d)(1)(F) or by a True Vapor Pressure test requested by the Executive Officer.

(6) Any tank that is out of service, where the tank has been emptied or has been opened to the atmosphere pursuant to the requirements of Rule 1149 – Storage Tank and Pipeline Cleaning and Degassing, shall be exempt from the requirements of paragraph (f)(4) until the tank is refilled.

(7) An owner or operator shall be exempt from the requirements of ~~subparagraph~~clause (f)(4)(B)(ii) if a determination is made that it is unsafe to conduct an inspection from a tank platform, provided that the reason(s) and date(s) the inspection was not conducted is documented. The inspections shall resume on the first day determined to be safe.

ATTACHMENT A

INSPECTION PROCEDURES AND COMPLIANCE REPORT FORMS

Equipment Needed:

Organic Vapor Analyzer (OVA) calibrated with methane in accordance with EPA Test Method 21, explosimeter calibrated with methane (for internal floating roof tanks), liquid resistant measuring tape or device, tank probe (to measure gaps in tank seals - 1/8 inch, 1/2 inch, 1-1/2 inch), flashlight.

Inspection Procedures:

1. The findings of all tank self-inspections, whether completed or not, shall be recorded on the Rule 1178 Compliance Report forms prescribed by the Executive Officer and submitted to South Coast AQMD's ~~the District's~~ Refinery Section in accordance with the rule's requirements. If an inspection is stopped before completion, indicate the reason for this action in the Comments section of the compliance report form.
2. During the compliance inspection, the person(s) conducting the inspection must have a copy of the Permit to Operate or Permit to Construct pertinent to the tank being inspected. Any discrepancies between the permit equipment description and the existing tank or the permit conditions and the actual operating conditions of the tank as verified during inspection must be recorded in the Comments section of the compliance report form.
3. Inspect the ground level periphery of each tank for possible leaks in the tank shell. Complete the tank information section (D) on the report.
4. For external floating roof tanks:
 - o From the platform, conduct an overall visual inspection of the roof and check for obvious permit or rule violations. Record the information as shown under section F of the compliance report form.
 - o During visual inspection of the roof, check for unsealed roof legs, open hatches, open emergency roof drains or vacuum breakers and record the findings on the report accordingly. Indicate presence of any tears in the fabric of both seals.
 - o Conduct an inspection of the roof fittings for vapor tight condition and record any leaks above 500 ppm in the fugitive emissions tank report OR conduct an inspection of the roof fittings using the 1/8" probes.

- o Conduct an inspection of the entire secondary seal using the 1/8" and 1/2" probes. Record the gap data in section F(4) of the report.
 - o Conduct an inspection of the entire primary seal using the 1/8", 1/2", and 1-1/2" probes. Inspect the primary seal by holding back the secondary seal. Record the gap data in section F(5) of the report.
 - o Record all cumulative gaps between 1/8 inch and 1/2 inch; between 1/2 inch and 1-1/2 inch; and in excess of 1-1/2 inches, for both primary and secondary seals in section G of the report. Secondary seal gaps greater than 1/2 inch should be measured for length and width, and recorded in Comments under section (J) of the report.
 - o For slotted guidepoles with a flexible enclosure system, conduct a visual inspection of the flexible enclosure system. Record any holes, tears, slots, or rips in the flexible enclosure system and any tightening or replacement of clamps at the top and the bottom of the flexible enclosure system pursuant to clause (d)(1)(A)(xi).
5. For internal floating roof and domed tanks:
- o Using an explosimeter, measure the concentration of the vapor space above the floating roof in terms of lower explosive limit (LEL), and record the reading in section (E) of the report.
 - o Conduct a visual inspection of the roof openings and the secondary seal, if applicable, and record findings on the report.
 - o Conduct gap measurements of the rim seal system and roof openings each time the tank is emptied and degassed but no less than once every ten years.
 - o Conduct a visual inspection of the slotted guidepole flexible enclosure system.
6. For fixed roof tanks:
- o Conduct an inspection of the pressure relief valves, piping, valves and fittings located on the roof for vapor tight condition and record any readings in excess of 500 ppm in the fugitive emissions tank report.
7. Complete all necessary calculations and record all required data accordingly on the report.



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT RULE 1178 COMPLIANCE REPORT

****PLEASE COMPLETE FORM LEGIBLY IN BLACK INK****

SCAQMD ID No.: _____

Tank No. _____ SCAQMD Permit No. _____ Inspection Date _____ Time _____

Is This a Follow-up Inspection? No Yes If yes, Date of Previous Inspection _____

A. COMPANY INFORMATION:

Company Name _____

Location Address _____ City _____ Zip _____

Mailing Address _____ City _____ Zip _____

Contact Person _____ Title _____

Phone _____ E-mail _____

B. INSPECTION CONDUCTED BY:

Name _____ Title _____

Company Name _____ Phone _____

Mailing Address _____ City _____ Zip _____

C. TANK INFORMATION:

Capacity _____ (bbls) Installation Date _____ Tank Diameter _____ (ft) Tank Height _____ (ft)

Product Type _____ Product RVP _____

Type of Tank: Riveted Welded Other (describe) _____

Color of Shell _____ Color of Roof _____

Roof Type: Pontoon Double Deck Other(describe) _____

External floating roof Internal floating roof or domed tank Flexible enclosure system

D. GROUND LEVEL INSPECTION:

1) Product Temperature _____ ° F 2) Product level _____ (ft)

3) List type and location of leaks found in tank shell.

4) List any discrepancies between the existing equipment and the equipment description on the Permit.

5) Is tank in compliance with Permit conditions? No Yes If no, explain _____

E. INTERNAL FLOATING ROOF OR DOMED TANK:

- 1) Check vapor space between floating roof and fixed roof with explosimeter. _____ % LEL
- 2) Conduct visual inspection of roofs, secondary seals, and slotted guidepole flexible enclosure system, if applicable.
- 3) Are all roof openings covered? No Yes If no, explain in Comments section (J) and proceed to part (H)(6).

F. EXTERNAL FLOATING ROOF TANK (or DOMED TANK AND INTERNAL FLOATING ROOF TANK when needed)

- 1) On the diagram (below) indicate the location of the ladder, roof drain(s), anti-rotation device(s), platform, gauge well, and vents or other appurtenances. Note information in relation to North (to the top of the worksheet).
- 2) Describe any uncovered openings found on the roof in the Comments section (J). (Refer to Rule 463(a)(1)(F)):
- 3) Identify any tears in the seal fabric. Describe and indicate on diagram (below):
- 4) Secondary Seal Inspection
 - a) Type of Secondary Seal: _____
 - b) Does 1/2" probe drop past seal? No Yes if yes, measure length(s) and show on diagram
 - c) Does 1/8" probe drop past seal? No Yes if yes, measure length(s) and show on diagram.
 - d) Record dimensions of gap for gaps > 1/8" _____ > 1/2" _____

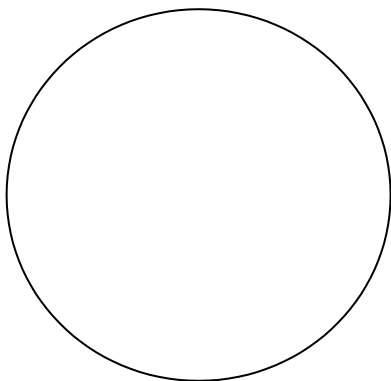
NOTE: Record the actual width and cumulative length of gaps in feet and inches. (Do not include gaps > 1/2" in 1/8" measurements)

- 5) Primary Seal Inspection
 - a) Type of Primary Seal: Shoe; Tube; Other _____
 - b) (shoe seal) does 1-1/2" probe drop past seal? No Yes ; if yes, measure length(s) and show on diagram.
 - c) (shoe seal) does 1/2" probe drop past seal? No ; Yes ; if yes, measure length(s) and show on diagram.
 - d) (tube seal) does 1/2" probe drop past seal? No Yes if yes, measure length(s) and show on diagram.
 - e) (all seal types) does 1/8" probe drop past seal? No Yes if yes, measure (length(s) and show on diagram.
 - f) Record dimensions of gaps for gaps > 1/8" _____ > 1/2" _____

>1-1/2" _____ NOTE: Record the actual width and cumulative length of gaps in feet and inches. (Do not include gaps > 1/2" in 1/8" measurements, or gaps > 1-1/2" in 1/2" measurements)

- 6) Deck Fitting Inspection (circle one) does 1/8" probe drop past gasket seal or pass Method 21? No Yes if yes, identify

NOTE: Show defects using symbols. Show seal gaps and lengths.



LEGEND:

Equipment:

- ⊞ Antirotational device
- Gauge well
- ⊞ Leg stand
- ⊞ Roof drain
- * Emergency roof drain
- ∞ Vacuum breaker
- σ Vent
- ⊞ Platform & ladder

Defects:

- ⊞ Leg top
- ⊞ Leg pin
- ⊞ Open hatch
- ∨ Torn seal
- |-P-| Primary seal gap
- |-S-| Secondary seal gap

Tank No. _____ SCAQMD Permit No. _____

7) Flexible Enclosure System Inspection

Does flexible enclosure system have any holes, tears, slots, or rips? If yes, identify location and approximate size: No Yes

Does the flexible enclosure system have double-clamps at the top that are fitted tightly to prevent fugitive emissions from being released to the outside? No Yes

Is the flexible enclosure system properly secured to the roof of the tank, with no visible gaps to prevent fugitive emissions from being released to the outside? No Yes

IF INTERNAL FLOATING ROOF OR DOMED TANK, PROCEED TO PART H(6) WHEN APPROPRIATE:

G. CALCULATIONS - complete all applicable portions of the following:

Record dimensions of indicated gaps [from F(4)(d), F(5)(b), and F(5)(f)]. Record in feet and inches.

Gaps in primary seal between 1/8 and 1/2 inch: _____

Gaps in primary seal between 1/2 and 1-1/2 inch: _____

Gaps in primary seal greater than 1-1/2 inches: _____

Gaps in secondary seal between 1/8 and 1/2 inch: _____

Gaps in secondary seal greater than 1/2 inch: _____

Multiply diameter (ft) of tank to determine appropriate gap limits:

5% circumference = diameter X 0.157 = _____ 60% circ. = diam. X 1.88 = _____

10% circumference = diameter X 0.314 = _____ 90% circ. = diam. X 2.83 = _____

30% circumference = diameter X 0.942 = _____ 95% circ. = diam. X 2.98 = _____

H. DETERMINE COMPLIANCE STATUS OF TANK:

1) Were any openings found on the roof? No Yes

2) Were any tears in the seals found: No Yes

3) Is the product level lower than the level at which the roof would be floating? No Yes

4) Secondary Seal:

Did 1/2" probe drop between shell and seal? No Yes

Did cumulative 1/8" - 1/2" gap exceed 95% circumference length? No Yes

5) Primary Seal

Shoe Did 1-1/2" probe drop between shell and seal? No Yes

Did cumulative 1/2" - 1-1/2" gap exceed 30% circumference length, and

Did cumulative 1/8 - 1/2" gap exceed 60% circumference length? No Yes

Did any single continuous 1/8" - 1-1/2" gap exceed 10% circ. length? No Yes

Tube Did 1/2" probe drop between shell and seal? No Yes

Did cumulative 1/8" - 1/2" gap exceed 95% circumference length? No Yes

6) Internal floating roof (installed before 6/1/84) did LEL exceed 50% No Yes

(installed after 6/1/84) or domed tank did LEL exceed 30%? No Yes

7) Does tank have permit conditions? No Yes

Does tank comply with these conditions? No Yes

I. IF INSPECTION WAS TERMINATED PRIOR TO COMPLETION FOR ANY REASON, PLEASE EXPLAIN:

J. COMMENTS:

Use this section to complete answers to above listed items and to describe repairs made to the tank; include date and time repairs were made.

K. I(We) certify the foregoing information to be correct and complete to the best of my(our) knowledge.

Inspection completed by: _____ Date: _____
(Signature) (Certification ID #)

Compliance status by: _____ Date: _____
(Signature) (Certification ID #)

Company Representative: _____ Date: _____
(Signature) (Certification ID #)

SEND COMPLETED REPORT TO: SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
21865 E. Copley Drive
Diamond Bar, CA. 91765 FAX: (909)396 -3341
Attn: Rule 1178 Supervising Inspector

OR

rule463rule1178compliancereports@aqmd.gov

FOR SCAQMD USE ONLY:		Date received _____
Reviewed by: _____	_____	Date reviewed _____
(Signature)	(Certification ID #)	
Tank Status: [] in compliance [] in violation, Rule(s) _____		
Comments: _____		

RULE 1178 FUGITIVE EMISSIONS TANK REPORT

Company Information							
Company Name							
Address							
Contact/Phone Number							
SCAQMD ID #				Report Date			
Tank ID	Type	Fitting	Date	Leak Rate	Type of Repair	Date	Post Repair Leak Rate

COMMENTS:

Use this section to complete answers to above listed items and to describe repairs made to the tank; include date and time repairs were made.

ATTACHMENT G

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Final Staff Report

Proposed Amended Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities

September 2023

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Planning, Rule Development, and Implementation
Sarah Rees, Ph.D.

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**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
GOVERNING BOARD**

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Senator (Ret.)
Senate Rules Committee Appointee

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Councilmember, South Pasadena
Cities of Los Angeles County/Eastern Region

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County of Orange

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Supervisor, Fourth District
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Cities of Los Angeles County/Western Region

EXECUTIVE OFFICER:

WAYNE NASTRI

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EXECUTIVE SUMMARY

Rule 1178 - Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities (Rule 1178) limits volatile organic compound (VOC) emissions from storage tanks at petroleum facilities that have emitted more than 20 tons of VOC in any reporting year since the rule's adoption in 2001. Applicable storage tanks have a design capacity of 19,815 gallons or more and store materials with a true vapor pressure (TVP) of greater than 0.1 pounds per square inch absolute (psia). Tanks with a potential to emit (PTE) of 6 tons per year (tpy) or more used in crude oil and natural gas production are also subject to the rule. The rule requires more stringent controls for storage tanks located at high emitting facilities. Controls include best available rim seal systems and covers or sleeves on all roof components that are gasketed, bolted, or equipped with wipers to reduce emissions from openings. Additionally, domes are required on tanks storing high volatile material.

California Assembly Bill 617 (AB 617) was signed into state law in 2017 and required strategy development to reduce toxic air contaminants and criteria pollutants in disadvantaged communities. During the development of the Wilmington, Carson, West Long Beach (WCWLB) Community Emission Reduction Plan (CERP), community members expressed concern about refinery emissions. Rule development for Rule 1178 was initiated in response to Chapter 5b, Action 4 in the WCWLB CERP that was adopted by the South Coast AQMD Governing Board on September 6, 2019. Recommendations for proposed amendments to Rule 1178 included improving leak detection and repair requirements by incorporating advanced leak detection technologies and requiring additional emission controls.

Control Measure FUG-03 – Further Reductions of Fugitive VOC Emissions in the 2012 Final Air Quality Management Plan (AQMP) identified the implementation of advanced leak detection technologies, including optical gas imaging, as a method to reduce the emissions impact from leaks. The 2016 Final AQMP included Control Measure FUG-01 – Improved Leak Detection and Repair to utilize advanced remote sensing technologies to allow for faster identification and repair of leaks from equipment at facilities that are currently required to maintain a leak detection and repair (LDAR) program. The 2022 Final AQMP also included Control Measure FUG-01 – Improved Leak Detection and Repair to reduce VOC emissions from fugitive leaks from process and storage equipment. PAR 1178 partially implements Control Measure FUG-01 that commits to improved leak detection requirements in South Coast AQMD rules, including Rule 1178.

Proposed Amended Rule 1178 (PAR 1178) establishes more stringent leak detection and repair and control requirements. PAR 1178 establishes weekly optical gas imaging (OGI) inspections and more stringent requirements for doming, emission control systems, secondary seals, maintenance, recordkeeping, and reporting. PAR 1178 applies to ~~1,093~~^{1,059} tanks located at ~~3027~~ facilities including refineries, bulk storage, loading, and oil production facilities. The proposed requirements will reduce VOC emission by 0.82 ton per day. Overall cost-effectiveness of PAR 1178 is \$27,800 per ton of VOC reduced. The cost-effectiveness to implement OGI inspections is \$25,400 per ton of VOC reduced. The cost-effectiveness to require domes on additional tanks is \$36,800 per ton of VOC reduced. The cost-effectiveness to require secondary seals on all floating roof tanks is \$22,800 per ton of VOC reduced. The cost-effectiveness to meet more stringent gap requirements and increased emission control system efficiency is zero since tanks are already

meeting the proposed requirements and no costs are assumed for tanks already meeting the proposed requirements.

PAR 1178 was developed through a public process. Eight Working Group meetings for PAR 1178 were held on March 17, 2021, July 15, 2021, December 9, 2021, March 24, 2022, July 14, 2022, October 27, 2022, January 5, 2023, and July 6, 2023. Working Group meeting participants included attendees from affected businesses, environmental and community representatives, public agencies, consultants, and other interested parties. The purpose of the Working Group meetings was to discuss details of proposed amendments and listen to stakeholder concerns with the objective to build a consensus regarding the proposal and resolve issues. Staff met with multiple stakeholders during the rule development process and conducted several site visits. A Public Workshop for PAR 1178 was held on March 1, 2023. The purpose of the Public Workshop was to present the proposed amended rule language to the general public and to stakeholders, as well as to solicit comments.

CHAPTER 1: BACKGROUND

INTRODUCTION

REGULATORY HISTORY

AFFECTED INDUSTRIES

PUBLIC PROCESS

INTRODUCTION

Rule 1178 limits VOC emissions from storage tanks at petroleum facilities that have emitted more than 20 tons of VOC in any reporting year since the rule's adoption in 2001. Applicable storage tanks have a design capacity of 19,815 gallons or more and store materials with true vapor pressure of greater than 0.1 psia true vapor pressure (TVP). Tanks with a PTE of 6 tpy or more used in crude oil and natural gas production are also subject to the rule. The rule implemented more stringent controls for storage tanks located at higher emitting facilities including gasketed and/or bolted covers on roof openings, sleeves and wipers and best available rim seal systems for floating roof tanks. Fixed roofs vented to the atmosphere were required to be converted to an internal or external floating roof tank or vented to a fuel gas system or an emission control system with at least 95 percent control efficiency. External floating roof tanks were required to be retrofit with domes if storing material with true vapor pressure of 3 psia or greater, excluding tanks storing crude oil.

California Assembly Bill 617 (AB 617) was signed into state law in 2017 and required the development of strategies to reduce toxic air contaminants and criteria pollutants in disadvantaged communities. AB 617 requires the California Air Resources Board (CARB) to select specific disadvantaged communities [and requires air districts](#) to prepare and implement a Community Emission Reduction Program (CERP) for each community. In 2018, CARB selected the Wilmington, Carson, West Long Beach (WCWLB) community.

During the development of the WCWLB CERP, community members expressed concern about refinery emissions. Rule development for Rule 1178 was initiated as a result of the Final WCWLB CERP adopted on September 6, 2019. Chapter 5b, Action 4 in the WCWLB CERP initiates rule development for Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities. Recommendations for proposed amendments to Rule 1178 focused on improving leak detection requirements with the use of advanced technologies and requiring additional emission controls.

Control Measure FUG-03 – Further Reductions of Fugitive VOC Emissions in the 2012 Final AQMP identifies the implementation of advanced leak detection technologies, including optical gas imaging, as a method to reduce the emissions impact from leaks. The 2016 Final AQMP included Control Measure FUG-01 – Improved Leak Detection and Repair to utilize advanced remote sensing technologies to allow for faster identification and repair of leaks from equipment at oil and gas and other facilities that are currently required to maintain an LDAR program. PAR 1178 partially implements Control Measure FUG-01 that commits to improved leak detection requirements in South Coast AQMD rules, including Rule 1178.

Staff assessed current Rule 1178 requirements and identified potential areas of improvement including leak detection and repair requirements and the potential for further emission reductions from requiring more stringent controls. Leak detection using enhanced detection technologies have become more widespread since the adoption of Rule 1178. Staff assessed multiple leak detection technologies as part of the PAR 1178 rule development. Staff also analyzed control technologies and methods with potential to further reduce emissions from storage tanks. Proposed amendments to PAR 1178 are based on determination of feasible and cost-effective technologies and methods that were assessed through a best available retrofit control technologies (BARCT) analysis.

REGULATORY HISTORY

Rule 1178 was adopted in 2001 and requires additional emission controls for tanks with a capacity of 19,815 gallons or greater used for the storage of organic liquids with a true vapor pressure of greater than 0.1 psia located at any petroleum facility that emits more than 20 tons of VOC in any reporting year since 2000. The additional emission controls included domes, gasketed and/or bolted covers with sleeves or wipers on all roof openings, best available rim seal systems, and emission control systems for fixed roof tanks.

Rule 1178 was amended on April 7, 2006 to allow an alternative for drain cover, include a modified seal requirement, update the inspection form, and clarify compliance schedules. Rule 1178 was amended again on April 6, 2018 to specify requirements for flexible enclosure systems, require repairs or replacements to be conducted within 72 hours of an identified leak, and clarify report submissions. Rule 1178 was amended again on November 6, 2020 to allow certain operators to accept a permit condition limiting vapor pressure on the material stored in lieu of installing a domed roof.

Rule 1178 was most recently amended on May 5, 2023 to address a reasonably available control technology (RACT) deficiency identified by U.S. EPA. The applicability of the rule was modified to include tanks subject to U.S. EPA's 2016 Control Techniques Guidelines and subject them to RACT controls already required by the rule. Tanks that have a potential to emit of 6 tons per year or more and are used in oil and natural gas production operations became subject to Rule 1178.

AFFECTED INDUSTRIES

PAR 1178 affects ~~1,093~~^{1,059} tanks located at ~~30~~²⁷ facilities in the petroleum industry including refineries, bulk storage and loading, terminals, and oil production. Nine refineries, seven bulk storage, nine terminals, and two oil production facilities will be affected by PAR 1178.

PUBLIC PROCESS

PAR 1178 was developed through a public process. Eight Working Group meetings for PAR 1178 were held on March 17, 2021, July 15, 2021, December 9, 2021, March 24, 2022, July 14, 2022, October 27, 2022, January 5, 2022, and July 6, 2023. Working Group meeting participants included affected businesses, environmental and community representatives, public agencies, consultants, and other interested parties. The purpose of the Working Group meetings is to discuss details of proposed amendments and to listen to concerns with the objective to build a consensus and resolve issues. Staff met with multiple stakeholders during the rule development process and conducted several site visits.

In addition, a Public Workshop for PAR 1178 was held on March 1, 2023. The purpose of the Public Workshop is to present the proposed amended rule language to the general public and to stakeholders, as well as to solicit comments.

Staff has also held numerous individual meetings regarding PAR 1178 with stakeholders, including facilities and environmental groups to understand specific concerns and how the rule

may uniquely affect them. Staff also met with technology and leak detection service providers. In addition, staff conducted 13 site visits to understand facility operations involving storage tanks and the effect of PAR 1178.

CHAPTER 2: BARCT ASSESSMENT

INTRODUCTION

EMISSIONS FROM STORAGE TANKS

CURRENT REGULATORY REQUIREMENTS

CONTROL TECHNOLOGIES

LEAK DETECTION TECHNOLOGIES

SUMMARY

INTRODUCTION

PAR 1178 development was initiated in response to concerns expressed by community members during the development of the WCWLB CERP. During the AB 617 WCWLB CERP development, recommendations were made for improved leak detection and repair requirements and additional controls. Additionally, South Coast AQMD periodically assesses rules to ensure that BARCT is reflected in rule requirements. To address community member concerns and ensure that Rule 1178 reflects BARCT, a BARCT assessment was conducted to identify the potential to further reduce emissions from storage tanks.

The BARCT assessment included a review of leak detection and emission reducing technologies. Newer leak detection technologies were reviewed and included OGI devices, gas sensors, and open path detection. Leak detection methods were also analyzed and included continuous monitoring and increased inspection frequency. Control technologies were reviewed and included domes, proximity switches, cable suspended floating roof systems, and vapor recovery. Staff analyzed the potential to reduce emissions from leaks with enhanced leak detection technologies and reduce emissions from tank operations by establishing more stringent requirements for existing controls including domes, seals, and emission control systems.

As part of the technology assessment, a cost-effectiveness analysis was conducted for technologies with potential to reduce emissions. A cost-effectiveness analysis determines the cost per ton of pollutant reduced. In the 2022 AQMP, a cost-effectiveness threshold of \$36,000 per ton of VOC reduced was established. An incremental cost-effectiveness was also conducted for proposed controls and monitoring methods and is detailed in Chapter 4.

EMISSIONS FROM STORAGE TANKS

Rule 1178 applies to aboveground storage tanks with a design capacity of 19,815 gallons or more and are used to store organic liquids with a true vapor pressure of greater than 0.1 psia under actual storage conditions and are located at petroleum facilities that have emitted 20 tons of VOC or more in any calendar year since year 2000. There are four major categories of storage tanks subject to the rule: fixed roof tanks, external floating roof tanks, domed external floating roof tanks, and internal floating roof tanks. There are a total of 1,0931,059 stationary tanks subject to PAR 1178 and 55 individually permitted portable tanks and 25 permitted portable tank systems consisting of up to 20 portable tanks for each permit.

Storage tanks emit VOC through openings inherent in the tank design. Rule 1178 requires the use of seals and covers to reduce the amount of VOC that can migrate out of the tank through the tank openings. Tank openings on fixed roof tanks include, but are not limited to, vapor recovery connection points, pressure vacuum vents and sample hatches. Floating roof tanks also contain openings that include the annular space around the floating roof, guidepoles, rim vents, pressure vents, hatches, and roof legs. Rule 1178 already requires controls on all roof openings and as part of the PAR 1178 rule development, staff reviewed additional technologies and methods to further reduce emissions from tank operation and leaks.

CURRENT REGULATORY REQUIREMENTS

South Coast AQMD Requirements

Rule 1178 contains requirements for storage tanks with a design capacity of 19,815 gallons or more, storing organic liquid with a TVP greater than 0.1 psia, and that are located at petroleum facilities that have emitted over 20 tons of VOC in any inventory year since 2000. Control requirements include specifications for tank roofs, emission control systems, and covers and seals for roof openings. Inspection and monitoring requirements are specific to the type of tank.

Floating roofs, or fixed roofs with 95 percent (%) by weight emission control, are required for every tank. Domes on external floating roof tanks are required when organic liquid stored has TVP of 3 psia or greater. Tanks used to store crude oil are exempt from the doming requirement. Rim seals systems for floating roofs have gap requirements. Primary seals must not have gaps larger than 1.5 inch. Gaps greater than 0.5 inch cannot exceed a cumulative length of 30% of the circumference of the tank and gaps greater than 0.125 inch cannot exceed 60% of the circumference. There cannot be a continuous gap of greater than 0.125 inch for more than 10% of the circumference. Secondary seals must not have gaps greater than 0.5 inch and gaps greater than 0.125 inch cannot exceed 5% of the circumference of the tank.

Controls for floating roofs include gaskets, gasketed covers, and sleeves or flexible enclosure systems for all roof penetrations. Certain roof openings cannot have a visible gap which is a gap greater than 1/8 inch and must be maintained in a vapor tight condition that does not emit more than 500 parts per million (ppm) of VOC. Fixed roof tanks are required to maintain a vapor tight condition for all roof openings and have at least 95% by weight emission control.

Rule 1178 contains differing inspection requirements dependent on tank type. Below is a summary of the inspection requirements.

Fixed roofs:

- Quarterly measurements per U.S. EPA Method 21
- Annual performance tests on vapor recovery systems

External floating roof tanks:

- Gap measurements on all roof openings semi-annually and each time tank is degassed or emptied, or U.S. EPA Method 21
- Complete gap measurements of the rim seal system on a semi-annual basis and each time the tank is emptied or degassed

Internal and domed external floating roof tanks:

- Visual inspections of rim seals and roof openings and lower explosive limit (LEL) readings semi-annually
- Complete gap measurements of the rim seal system when tank is emptied or degassed and at least every 10 years

Other Regulatory Requirements

Staff reviewed rules and regulations of other air regulating agencies including U.S. EPA, San Joaquin Valley Air Pollution Control District (SJVAPCD), and Bay Area Air Quality Management

District (BAAQMD). Staff identified requirements more stringent than those contained in South Coast AQMD's Rule 1178 for controls and monitoring. It is important to note there are several requirements where South Coast AQMD's Rule 1178 is more stringent than requirements contained in other air districts' rules, such as applicability, inspection frequency, doming and other requirements and may be more stringent overall. However, the following discussion describes the requirements found in other regulations that are more stringent than Rule 1178 requirements.

U.S. EPA 40 Code of Federal Regulations (CFR) Part 60 Subpart Kb applies to tanks that were constructed, reconstructed or modified after July 23, 1984. Staff identified requirements for primary seal gaps that are more stringent. Subpart Kb requires primary seal gaps do not exceed 212 square centimeters (cm²) per meter of tank diameter.

SJVAPCD's Rule 4623 contains more stringent gap requirements. A visible gap is any gap that is 0.06 inch. Primary seal gaps greater than 0.5 inch cannot occur for more than 10% of the tank circumference and primary seal gaps greater than 0.125 inch cannot occur for more than 30% of the tank circumference.

BAAQMD's Regulation 8, Rule 5 has more stringent gap requirements and a more stringent leak definition. BAAQMD defines a visual gap as a gap that is 0.06 inch. Primary seals gaps greater than 0.5 inch cannot occur for more than 10% of the tank circumference, gaps greater than 0.125 inch cannot occur for more than 40% of the tank circumference. BAAQMD also requires that the maximum gap for secondary seals on newer welded tanks cannot exceed 0.06 inch. BAAQMD has a leak definition of 100 ppm for all components except for pressure vacuum vents.

CONTROL TECHNOLOGIES

Domes

Domes are roofs that can be installed onto external floating roof tanks. They are typically a geodesic dome shape and made of lightweight material such as aluminum. Domes that are affixed onto external floating roof tanks are not vapor tight and have vents along the bottom of the dome where it meets the tank shell. This is a required design for floating roof tanks to allow the floating roof to move up and down without adverse effects. Domes are effective at reducing emissions from tanks by eliminating wind moving over the external floating roof. Wind can carry vapors out from inside the tank through the floating roof seals. It is estimated that installing domes on external floating roof tanks storing crude oil can reduce standing losses by 70%-75%¹.



Costs and Cost-effectiveness

Costs to install domes vary with diameter size. External floating roof tanks can be as small as 30 feet in diameter and as large as 260 feet in diameter. Costs associated with doming include

¹ Based on results from TankESP PRO for doming external floating roofs of different diameters storing crude with RVP 6-9 at 80F in Los Angeles, with deck fittings currently required by Rule 1178.

materials, labor, vehicles for supply delivery and crane support, crane rentals, site preparation, cleaning, degassing, storage leasing and permitting. Costs were obtained from vendors for equipment and installation for domes of different sizes. Facilities supplied costs from vendor quotes and past doming projects. Costs were provided by seven facilities for doming external floating roof tanks with diameters ranging from 50 to 260 feet. Doming project costs ranged from approximately \$207,000 to \$3.7 million and included costs for fire suppression systems and union labor required by Senate Bill 54. Refer to Chapter 4 for additional cost details.

Staff identified 54 external floating roof tanks used to store crude oil, 90 feet to 260 feet in diameter. Tanks storing crude oil were identified using 2019 Annual Emission Reports. Based on cost information provided by facilities, staff developed a cost curve that estimates costs for tanks of all diameters. The cost-effectiveness to require domes on 54 tanks is \$36,800 per ton of VOC reduced. Refer to Chapter 4 for additional cost-effectiveness details.

Public Process When a Cost-Effectiveness Threshold is Exceeded

The 2022 Final AQMP requires that staff present options for a control under the established threshold when cost-effectiveness of a proposed requirement exceeds the established threshold. Staff identified two options for doming with cost-effectiveness of less than the established threshold of \$36,000 per ton of VOC reduced.

Option 1: Move date of full implementation for 2038 to 2041. This option results in a cost-effectiveness of \$35,400 per ton of VOC reduced.

Option 2: Require fewer tanks to dome. Requiring doming for 53 out of 54 proposed to be domed results in a cost-effectiveness of \$35,300 per ton of VOC reduced.

Moving the full implementation date to 2041 results in additional tanks for which cleaning and degassing costs would not be considered, resulting in ~~lower~~improved cost-effectiveness. Requiring 53 out of 54 tanks to be domed results in ~~lower~~better cost-effectiveness when the tank with the ~~worst~~highest cost-effectiveness is removed. This tank is one of the largest tanks and has high cost associated with doming due to its size. Additionally, this tank had low reported throughput in the 2019 AER resulting in a cost-effectiveness of greater than \$100,000 per ton of VOC reduced.

Alternative to Doming

Staff analyzed alternative options to doming with potential to result in equivalent emission reductions. Staff's analysis showed that limiting the TVP of crude stored has potential to result in equivalent emission reductions to doming. Based on emission calculations using TankESP PRO software, staff found that limiting Reid Vapor Pressure (RVP) of crude to approximately 3.7 psia results in equivalent emission reductions to doming. RVP is the vapor pressure of the organic liquid at 100 degrees Fahrenheit as determined by ASTM Method D-323, whereas TVP is the vapor pressure of the organic liquid at actual storage temperature. The average TVP of crude resulting in equivalent emissions to doming is approximately 2.2 psia (RVP 3.7 psia). Staff is proposing to maintain the requirement for doming on external floating roof tanks used to store organic liquid with TVP of 3 psia or greater and remove the exemption for crude oil tanks. It is

expected that some facilities will elect to only store crude oil with a TVP less than 3 psia in lieu of doming for certain crude oil tanks.

Discussion

Many domes are in use today to effectively reduce emission from storage tanks. Several facilities subject to Rule 1178 have already installed domes on tanks storing non-crude oil material with TVP of 3 psia or greater. The cost-effectiveness to dome crude oil tanks is \$36,800 per ton of VOC reduced and staff proposes to require domes for all tanks with true vapor pressure of 3 psia or greater including crude oil storage tanks, with a full implementation date of 2038, unless facilities submit a permit application to limit the crude oil TVP to less than 3 psia by a specified date. Staff proposes to retain the 2038 date for full implementation since it is a cost-effective, reasonable timeline for doming projects to be completed for all facilities, except for one facility.

The implementation date of 2038 is cost-effective and feasible for facilities with fewer and smaller tanks. One facility has the largest and greatest number of tanks at a single location subject to the doming requirements. Requiring full implementation in 2038 may impact the fuels market if the facility takes more than one tank out of service at a time as this facility processes nearly 40% of all the crude processed ~~at the facilities with~~through tanks proposed to be domed (according to reported throughput in 2019 AERs). To avoid potential market impacts, an alternative compliance schedule is proposed to allow the facility to complete doming without removing more than one tank from service at a time. The alternative compliance schedule will allow the facility three additional years to complete doming for all applicable tanks requiring full implementation in 2041.

Subsequent to the release of the Draft Staff Report, an additional facility was identified that is planning to expand operations that increase VOC emissions to over 20 tons of VOC in an emission inventory year and will result in the facility becoming subject to PAR 1178 after date of adoption. The facility contains five crude oil tanks that are expected to become subject to the doming requirement and will be required to install domes on the crude oils tanks no later than two years after becoming subject to the rule pursuant to clause (d)(5)(A)(ii) of PAR 1178.

Proximity Switches

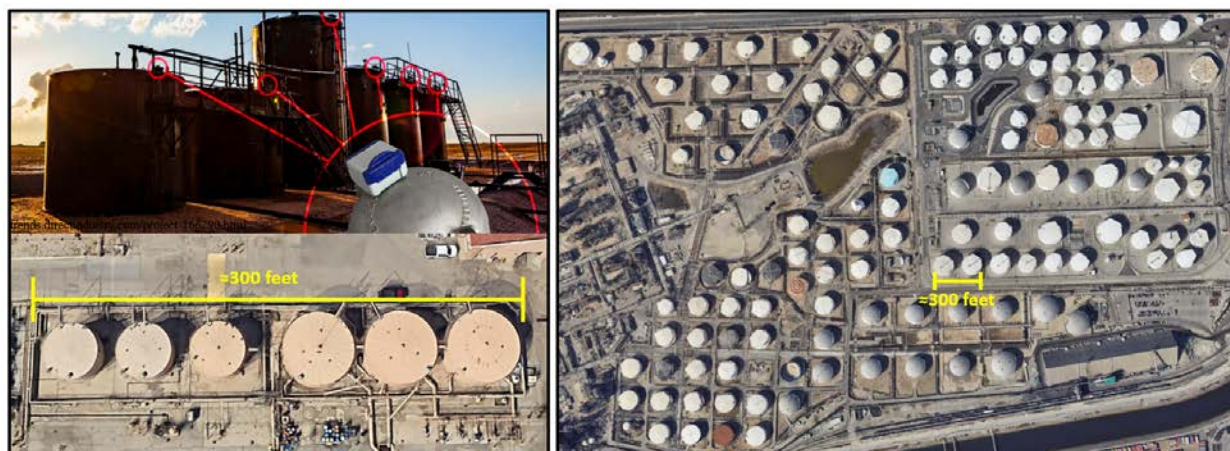
Proximity switches are sensors designed to detect when covers to roof openings, such as sample hatches, are not properly closed. Proximity switches are also designed to detect when pressure vacuum relief vents (PVRV) have not re-seated properly. The sensor system consists of a switch, transmitter, and receiver. The switch is constructed on the hatch or PVRV and is connected to a wireless transmitter that sends signals to a base radio when an open hatch or PVRV is detected. Network systems can be designed to alert facilities via email or cellular phone text. These systems require cellular and power service. Solar power options are available for power in remote locations as well as cellular options. The system is intrinsically safe and explosion proof.



Proximity switches can reduce emissions from sample hatches left open or not properly closed, or from PVRVs that do not re-seat properly, by alerting facilities when an opening is detected, resulting in faster repair timelines. Remote tanks that are not frequented and/or not subject to regular inspections may emit VOC through an open hatch or PVRV for extended periods of time. One limitation reported by a provider is the proximity switch's inability to detect small openings of the sample hatch cover or PVRV seat. The provider estimates that covers and/or PVRV seats open 10%-15% may go undetected by the proximity switch.

Many proximity switches are in use today and most found on tank batteries at oil production sites. Staff is not aware of proximity switches implemented at large tank farms containing tanks very large in diameter with large footprints, such as refineries or bulk storage facilities. Proximity switches implemented at large tank farm sites may require complex installation and infrastructure. Figure 2.1 shows the difference in size between a tank battery at an oil production site and a tank farm at a bulk storage facility.

Figure 2.1 – Tank Footprint at Oil Production Site Compared to Bulk Storage Facility



Costs and Cost-effectiveness

Proximity switch costs were obtained from a supplier that provided a quote. Each tank would be required to have one transmitter for each component that would be monitored. A transmitter and a switch is \$1,850 for both pieces of equipment. One base radio can accommodate up to 96 transmitters and is required for each facility. The base radio was quoted at \$2,650. For facilities without access to grid power, a solar power supply may be used and was quoted at \$2,400. Tank farms are not likely to have nearby power supply and would require solar power or another electricity connection. A cellular option is available for sites that do not have internet connection. Cellular connectivity allows the facility to receive alerts via text or email. The cellular option is \$1,300.

Costs were estimated for 1,059 tanks. Approximately 75% of all tanks are floating roof tanks and 25% of all tanks are fixed roof tanks. Each floating roof tank is estimated to require one switch for the guidepole cover and each fixed roof tank would require three switches per tank for each of the

PVRVs. The total number of sensors needed for all tanks is 1,587. The total number of transmitters required is also 1,587. The total estimated cost for 1,587 switches and transmitters is \$2,935,950. Assuming one base radio can connect to all transmitters at a large facility, staff applied costs for one base radio per facility and one solar power supply per facility. The total estimated cost for base radios and power supply is \$136,350. The supplier did not provide costs for installation of the sensor system. Staff assumed installation costs at 50% of equipment costs to include travel, site evaluation, planning, and installation. The total estimated equipment and installation cost is \$4,485,230.

Cost-effectiveness was based on available cost information, assumed equipment life of 10 years and assumed emission reductions equivalent to the reductions estimated for continuous monitoring leak detection (refer to Figure 4.1). The total cost-effectiveness is \$2,700 per ton of VOC reduced.

Discussion

Inspector reports were reviewed to understand how often inspectors find open sample hatches that are not closed properly. Notice of violations were reviewed for the past five years for Rule 1178 and 463. One notice of violation was written to a facility subject to Rule 463 for a sample hatch cover that was not properly closed. Discussions with facilities revealed that guidepole covers are not often open for sampling but sampling frequency and methods at facilities differ. Some facilities may sample more frequently than others or more frequently at certain times, depending on operations.

Although cost-effectiveness is \$2,600 per ton of VOC reduced, staff is not proposing to require proximity switches since PAR 1178 will require facilities to inspect tanks on a weekly basis with an OGI device. OGI inspections will capture leaks resulting from an open sample hatch or PVRV that has not re-seated properly. Additionally, OGI inspections will identify emissions from open sample hatches or open PVRVs when proximity switches cannot, such as when a sample hatch cover or PVRV is open less than 15% or when sample hatch gaskets and covers are worn or degraded. Proposed weekly OGI inspections have the potential to be more effective at reducing emissions from sample hatches and PVRVs compared to proximity switch installations.

Cable Suspension Systems

Cable suspended floating roofs are designed with cable suspension systems to support the floating roof and remove the need for roof legs. Emissions from internal floating roof tanks are reduced with cable suspension systems by the elimination of floating roof leg penetrations that provide a potential opening where VOC can migrate from below the floating roof to atmosphere.



Initially, cable suspended floating roofs were estimated to decrease standing losses by 35%², as based on results from TankESP PRO software. Emissions

² Based on results from TankESP PRO for eliminating roof legs on internal floating roof tanks 70', 90' and 117' in diameter storing various organic liquids including gasoline with RVP 10 at 80F in Los Angeles, with standard deck fittings currently required by Rule 1178 and TankESP PRO default settings for roof leg controls.

from a tank equipped with a cable suspension system, modeled in TankESP PRO with a tank equipped with zero roof legs, were compared to a tank equipped with the standard number of roof legs and standard controls (default options). Staff was made aware that the default option for roof leg controls did not reflect current requirements in Rule 1178 for roof leg socks on all adjustable roof legs. For this reason, emission reductions were revised to reflect controls currently required on internal floating roof tanks which are impervious VOC socks for adjustable roof legs. The results from the revised calculation show an 8%³ reduction in total emissions when a tank's roof legs are eliminated.

Costs and Cost-Effectiveness

Costs vary to retrofit internal floating roof tanks with cable suspension systems and depend on factors such as the existing floating roof and the structure of the fixed roof. Not all existing floating roofs are compatible with cable suspension systems and the fixed roof of the tank must be able to support the cable suspension system. Costs were obtained from two suppliers for the retrofit of a cable suspension system on an existing floating roof and the retrofit of a cable suspension system with a new compatible floating roof. Both cost estimates assume that the fixed roof is compatible with the cable suspension system and would not require significant modification or replacement. One supplier provided two cost estimates. The cost to retrofit an existing floating roof with a cable suspension system was estimated at \$70,000. The cost to install a cable suspension system with a new floating roof was estimated at \$200,000. Another supplier provided a quote that included costs for equipment, shipping, demolition, roof modification and labor for installation. Total costs ranged from \$120,000 to \$670,000 depending on the size of the tank, up to 150 feet in diameter. The cost-effectiveness to require cable suspension systems is \$153,000 per ton of VOC reduced. Staff is not proposing to require cable suspension systems for internal floating roof tanks.

Discussion

Cable suspension systems may result in less emissions from an internal floating roof tank compared to a typical floating roof containing roof leg penetrations. The cost-effectiveness to retrofit cable suspension systems on internal floating roof tanks is estimated at \$153,000 per ton of VOC reduced and staff does not propose to require cable suspension systems.

Emission Control Systems (Vapor Recovery)

Vapor recovery systems collect VOC vapors and either destroy the VOC by combustion or remove VOC from gas streams with adsorption prior to reaching the atmosphere. Vapor recovery systems are currently used for emission control on sources at petroleum facilities such as fixed roof tanks and truck loading racks. The most common type of vapor recovery system used on fixed roof tanks are combustion systems that have associated NOx emissions. Adsorption with carbon canisters do not emit NOx



³ Based on results from TankESP PRO for eliminating roof legs on internal floating roof tanks 70', 90' and 117' in diameter storing various organic liquids including gasoline with RVP 10 at 80F in Los Angeles, with standard deck fittings and current required emission controls for roof legs.

emissions, however, have higher capital costs and are less desirable for tanks.

Staff obtained information on vapor recovery units from two suppliers. One supplier stated that the company can guarantee control efficiency of 98% for their combustion systems and 95% for their non-combustion systems. A review of compliance reports and initial performance tests for vapor recovery systems used at facilities subject to Rule 1178 was conducted to understand the control efficiency currently achieved by vapor recovery systems in use. Most annual performance tests confirm compliance with current rule requirements of 95% control efficiency but do not specify the percent efficiency that was measured. One compliance report specified a measured control efficiency of greater than 99%. Four initial performance tests for combustion vapor recovery systems were reviewed and showed greater than 99% control efficiency. Staff was not provided annual performance test results that suggest 98% control efficiency is not achievable by a unit currently in use.

Costs and Cost-effectiveness

Based on the source test information obtained stating the control efficiencies achieved by units currently in use, staff concludes that units currently operating are achieving at least 98% control efficiency. No costs are assumed to meet a proposed control efficiency of 98%. Since units are currently achieving a 98% control efficiency, no reductions are assumed in the cost-effectiveness analysis (however, emissions reductions are assumed for the purpose of submission to the state implementation plan. Details on the calculated emission reductions are contained in Chapter 4). Since no emissions reductions or costs are assumed to meet 98% control efficiency, the cost-effectiveness is \$0 per ton of VOC reduced.

Discussion

Based on information obtained from vapor recovery suppliers and source tests, staff concludes that vapor recovery units currently installed are achieving at least 98% control efficiency and proposes to require 98% by weight control efficiency for all emission control systems connected to fixed roof tanks. Since units are achieving the proposed requirement, no costs or reductions were assumed, and the cost-effectiveness is \$0 per ton of VOC reduced.

Seals

Primary and secondary seals are used on floating roof tanks to seal the annular space between the floating roof and the tank shell to prevent VOC vapors from migrating out of the tank. Gaps between the floating roof seals and the tank shell are allowed by Rule 1178 and other ~~—tank~~ agency tank rules, however, more stringent gap requirements were contained in SJVAPCD and U.S. EPA rules. Additionally, Rule 1178 does not require both a primary seal and secondary seal on all tanks. An assessment was conducted to determine the feasibility to require more stringent gap requirements and secondary seals on all tanks.



Staff analyzed the feasibility of meeting more stringent gap requirements established at the other agencies. A review of a statistically significant sample of leak reports for floating roof tanks (10%) was conducted. Leak reports for 84 floating roof tanks were reviewed to determine the feasibility of meeting more stringent gap requirements. Leak reports for 48 out of 84 tanks showed no reported gaps for the secondary seal. Gaps reported on the remaining 36 tanks showed gaps that met the stringent gap requirements established at other agencies. Based on the information reviewed, staff concludes that tanks are currently meeting meet more stringent gap requirements. Moreover, those tanks subject to the EPA New Source Performance Standard, 40 CFR Part 60, Subpart Kb, requirements including more stringent gap requirements already apply and must be met.

Staff identified tanks that are not equipped with secondary seals. Initially, Eight internal floating roof tanks used to store organic liquid with true vapor pressure of greater than 0.1 psia were not equipped with secondary seals. A cost-effectiveness analysis was conducted to determine if requiring secondary seals for all tanks is cost-effective. Subsequently, another 16 tanks were identified that would be required to install secondary seals.

Costs and Cost-effectiveness

No costs were assumed to meet more stringent gap requirements. Like the cost-effectiveness analysis for vapor recovery systems, the cost-effectiveness to meet more stringent gap requirements assumes no associated costs and no emission reductions and results in a cost-effectiveness of \$0 per ton of VOC reduced.

Secondary seal costs were obtained from two secondary seal providers and one facility. The total number of feet of secondary seal required for the initially identified eight tanks is 1,363. The approximate cost for equipment, installation and permitting is \$430,000. The total emission reductions estimated using TankESP PRO is 18.8 tons over 20 years and the cost-effectiveness is \$22,800 per ton of VOC reduced. Additional details on costs and cost-effectiveness are contained in Chapter 4.

Discussion

Staff is proposing gap requirements as stringent as those contained in other agency rules. The proposed requirement would revise the gap allowances and require gaps between the secondary seal and tank shell greater than 1/8 inch not to exceed 30% (currently 60%) of the length of the tank circumference and gaps greater than 1/2 inch not to exceed 10% (currently 30%) of the circumference.

Staff is also proposing secondary seals on all tanks. Installation of a secondary seal would be required the next time the tank is emptied or degassed but no later than 10 years after date of adoption.

LEAK DETECTION TECHNOLOGIES

Staff reviewed leak detection technologies, including continuous monitoring systems. Technologies reviewed included optical gas imaging devices, gas sensors and open path detection

devices. Several suppliers were contacted to obtain information about the viability of the technologies for VOC leak detection. Staff also contacted leak detection service providers to understand their experience with using leak detection technologies.

Optical Gas Imaging (OGI)

An optical gas imaging camera uses infrared technology capable of visualizing vapors. Optical gas imaging cameras have different detectors capable of visualizing a variety of gas wavelengths. VOC wavelengths are in the 3.2-3.4 micrometer waveband. OGI cameras with the ability to detect or visualize in this waveband range contain a cryocooler that is integrated into the sensor and increases the sensitivity of the camera and the ability to detect smaller leaks.



OGI cameras are widely used as a screening tool for leak detection purposes and have continuous monitoring capability. Fixed OGI systems have been implemented at well sites and compression stations for continuous emissions monitoring. Handheld OGI cameras are used widely by leak detection service providers as well as facilities for periodic monitoring. Figure 2.2 provides an example of the coverage a network of fixed OGI camera can provide.

Figure 2.2 – Example of Area Monitored with Fixed OGI Device



Fixed OGI cameras may not catch all leaks that can be identified during an inspection where a portable OGI device is manually operated. Fixed OGI cameras are limited in the number of angles from which a tank can be viewed and would likely be stationed further away from an emissions source compared to a person conducting an inspection with a portable OGI device. Stationary and portable devices both have the capability to detect large leaks, however, there is greater chance that smaller leaks would be identified with a manual field inspection than with a stationary camera because tanks can be monitored in close proximity using portable devices such as handheld OGI cameras and toxic vapor analyzers (TVA). Figures 2.3 and 2.4 show images captured with an OGI device by South Coast AQMD compliance and enforcement staff.

Figure 2.3 – Fixed Roof Tank Viewing with an OGI Device

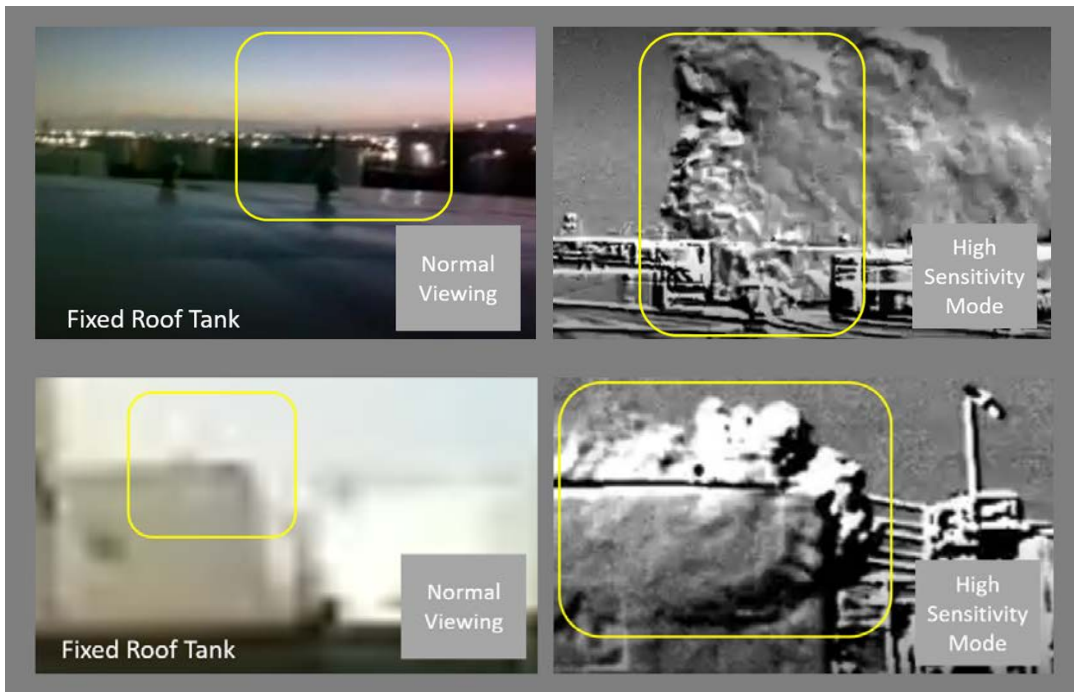
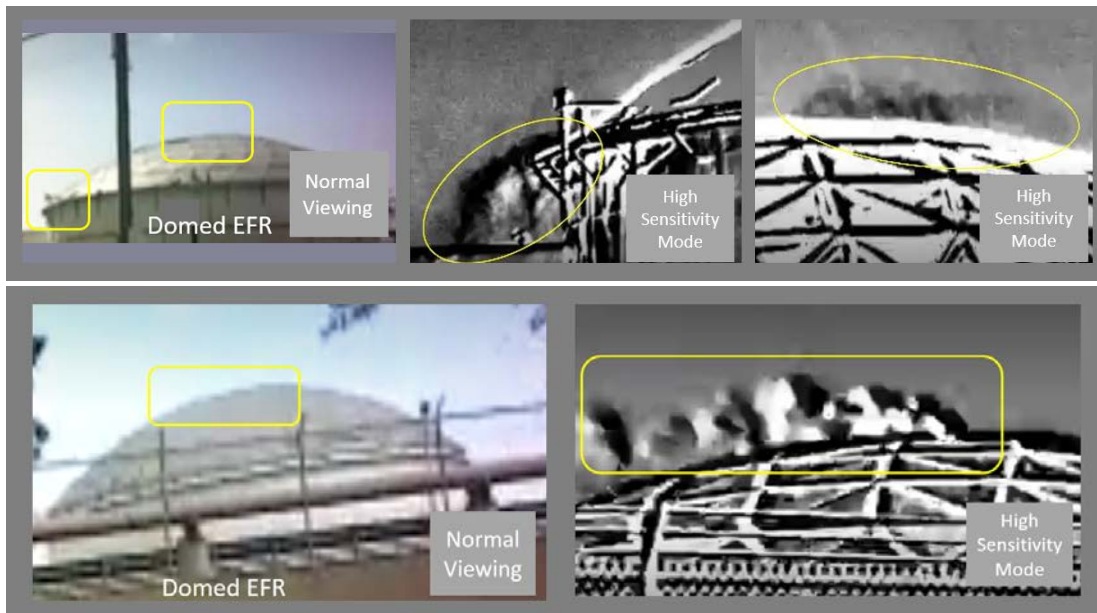


Figure 2.4 – Domed External Floating Roof Tank Viewing with an OGI Device



Costs and Cost-effectiveness

Costs were obtained from OGI providers for handheld OGI cameras and fixed continuous monitoring cameras. A portable cooled OGI camera costs approximately \$106,000 and requires replacement of the cryocooler every 3-4 years or every 10,000-13,000 hours of operation. The replacement cost is approximately \$15,000. Cameras for fixed applications cost approximately \$97,000. Explosion proof enclosures and pan and tilt fixtures would increase costs by \$12,500 per camera. Options provided for fixed applications include cellular connection and power for use in remote areas. These options are more costly and increase the cost per camera to approximately \$120,000. The cost-effectiveness for continuous monitoring with fixed OGI cameras is \$23,900 per ton of VOC reduced.

Hardware as a service is a business model that allows facilities to have technology installed, maintained and operated by the technology provider. This option removes the responsibility from the facility for installation, maintenance, repair and operation and well as associated costs. Hardware as a service also ensures operation and maintenance by experienced personnel that specialize in the equipment. Fixed OGI systems are offered as hardware as a service and costs range from approximately \$11,000 per month per camera, for a basic fixed system which includes the camera mounted in explosion proof housing, to approximately \$20,000 per month per camera for a basic fixed system with its own power source. Cost-effectiveness for continuous monitoring with fixed OGI cameras as a service is \$188,500 per ton of VOC reduced.

Costs were also obtained from leak detection service providers. An inspection is approximately \$3,000 per day and would include closely monitoring about four individual tanks and performing an overview inspection of the entire tank farm for large leaks. The cost-effectiveness to require weekly inspections is \$25,400. Refer to Chapter 4 for details on costs and cost-effectiveness.

Open Path Detection

Open path detection devices emit beams that detect VOCs. For VOC to be detected with an open path device, the VOCs must contact the beam. Open path detection devices can detect gas concentrations in the parts per billion range and from distances as far as 300 meters away from a source, with some models advertised as having a range of 1,000 meters. One open path device can cover multiple paths. Staff is aware of open path devices currently operating that cover two paths per unit. Once VOC has been detected by an open path device, it is likely a follow up investigation is required to pinpoint the source of the leak. To locate the source of emissions, OGI cameras or TVAs are commonly used.



Open path devices can detect small concentrations of VOC in the ppb range and can also speciate VOC. A significant limitation to leak detection of these devices is the requirement for VOCs to contact the emitted beam. This provides a chance for VOCs to go undetected if travelling on a path that does not intercept the beam. Another drawback to open path detection is the dilution factor. VOCs originating from a tank may need to travel hundreds of feet before contacting the emitted beam. The concentration of VOC may dilute so significantly that VOCs are undetectable by the

time the VOCs reach the emitted beam. Figure 2.5 demonstrates the general leak detection coverage area with an open path device.

Figure 2.5 – Example of Area Monitored with Open Path Technology



Costs and Cost-effectiveness

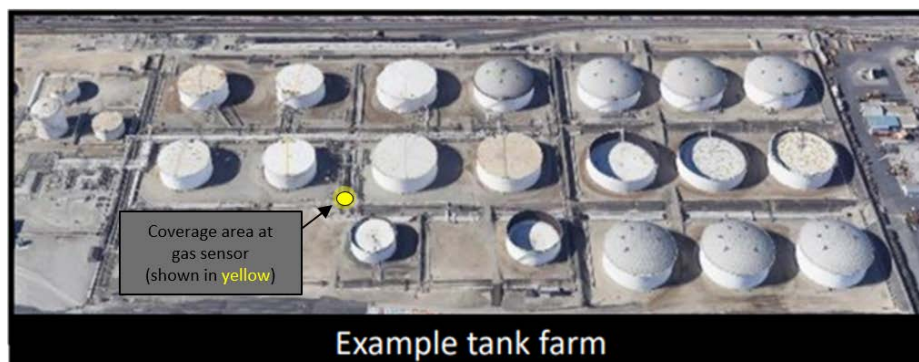
Costs are estimated at approximately \$200,000 per unit and do not include installation and any additional structures required to be built to support the fixed monitors. Annual maintenance of \$5,000 per unit was estimated. The cost-effectiveness for open path detection is \$30,700 per ton of VOC reduced. Refer to Chapter 4 for details on costs and cost-effectiveness.

Fixed Gas Sensors

A toxic vapor analyzer (TVA) is a gas sensor that is handheld and used currently for inspections. The gas sensors referred to in this section have the capability to continuously monitor for VOC emissions and are installed as fixed applications. Concentrations of VOC detected with fixed gas sensors are in the ppb/ppm range depending on the sensor and have a maximum detection range of about 50-100 ppm. Like open path devices, gas sensors can only detect emissions when VOCs contact the fixed sensor. Leaks from storage tanks must be significant at the source to be detected by a fixed gas sensor due to the dilution factor. According to one supplier, it is estimated that a leak with a concentration of 72,000 ppm is detectable by a gas sensor 100 feet away. A leak with a concentration of 18,000 ppm is detectable by a gas sensor 50 feet away. Figure 2.6 demonstrates the general leak detection coverage area with gas sensors.



Figure 2.6 – Example of Area Monitored with Gas Sensor



Costs and Cost-effectiveness

Equipment costs for gas sensors are much lower compared to open path and OGI devices, however, operating and maintenance costs are higher due to sensor replacements and service/operation costs. Staff obtained costs from two suppliers. One supplier quoted equipment at approximately \$2,000 per unit and monthly operating cost of \$400 per unit. The cost-effectiveness to require continuous monitoring with gas sensors is \$44,800 per ton of VOC reduced. The other supplier offers fixed gas sensor networks as a service. The cost for the service is approximately \$6,500 per year per sensor. Refer to Chapter 4 for details on costs and cost-effectiveness.

Discussion

Each leak detection technology has advantages and disadvantages. Staff determined that the best leak detection method for storage tanks is to have an operator conduct inspections using a handheld OGI device. There are several advantages to conducting inspections manually with an OGI device compared to continuous monitoring systems. The most significant advantage is the high likelihood a large leak will not go undetected. Additionally, operators can view the tank from multiple areas or distances including from the tank platform focusing on individual components to capture smaller leaks that may go undetected by stationary continuous monitoring systems. Continuous monitoring systems such as open path and gas sensor networks require an operator to manually locate a leak usually requiring an OGI camera or TVA. Manual inspections with an OGI device also allow for the inspector to make a distinction between normal operation and a leak. Another advantage includes quicker support if the monitoring technology malfunctions. A leak detection service can provide an OGI device when required. Continuous monitoring systems are complex and specialized and may require the service provider to provide support onsite. This may result in downtime of the continuous monitoring system.

Manual inspections with a portable OGI device can be more or less time intensive depending on how the inspection is carried out. If inspections are conducted for all components on each tank, approximately 4 tanks per day can be monitored individually from the tank platform. It is not cost-effective to require individual monitoring of each tank weekly. Monitoring the entire tank farm from a distance would allow multiple tanks to be viewed in one frame, is less time intensive, and cost-effective to carry out more frequently compared to individual tank monitoring. With this type of inspection, large leaks can be identified quicker since the inspections are carried out on a more frequent basis.



Staff proposes weekly OGI inspections for all tanks and additional semi-annual inspections for floating roof tanks. Weekly inspections will require monitoring of all tanks subject to Rule 1178. This inspection will not require an inspector to climb or access a tank unless vapors are observed that indicate malfunctioning equipment. Semi-annual OGI inspections for floating roof tanks will require the inspector to conduct the inspection from the tank platform. These inspections will only be required for floating roof tanks since fixed roof tanks are already subject to quarterly Method 21 inspections. Semi-annual OGI inspections for floating roof tanks will supplement other existing semi-annual inspections such as gap measurements and LEL readings. Semi-annual inspections are proposed to identify smaller leaks that may go undetected during existing inspections and proposed weekly OGI inspections.



SUMMARY

Several technologies were assessed for their potential to reduce emissions from storage tanks. Cost-effectiveness was determined for each technology with potential to reduce emissions. Based on the BARCT assessment for technologies with potential to reduce emissions, staff proposes to require doming for all tanks storing organic liquid with true vapor pressure of 3 psia and greater, including crude oil tanks currently exempt from doming, more stringent gap requirements, 98% emission control for fixed roof tanks, secondary seals on all floating roof tanks, and weekly and semi-annual OGI inspections. Table 2.1 shows the cost-effectiveness for proposed requirements.

Table 2.1 – Cost-Effectiveness for Proposed Requirements

Proposed Requirement	Cost-Effectiveness (\$/ton)
Domes for external floating roof tanks storing organic liquid with TVP of 3 psia or greater, including crude oil tanks	\$36,800
98% emission control for fixed roof tanks	\$0
More stringent gap requirements	\$0
Secondary seals for floating roof tanks	\$22,800
OGI monitoring (weekly/semi-annual)	\$25,400
Overall	\$27,800

CHAPTER 3: PROPOSED AMENDED RULE 1178

INTRODUCTION

PROPOSED AMENDED RULE STRUCTURE

PROPOSED AMENDED RULE 1178

INTRODUCTION

PAR 1178 establishes requirements for storage tanks located at petroleum facilities storing organic liquid. PAR 1178 includes requirements for tank seals, emission control systems, doming, inspections and monitoring, reporting and recordkeeping.

The following information describes the structure of PAR 1178 and explains the provisions incorporated from other source-specific rules. New provisions and any modifications to provisions that have been incorporated are also explained. PAR 1178 also includes grammatical and editorial changes for clarity. Several requirements were moved to consolidate.

PAR 1178 STRUCTURE

PAR 1178 will contain the following subdivisions:

- a) Purpose*
- b) Applicability*
- c) Definitions*
- d) Requirements*
- e) Identification Requirements*
- f) Inspection and Monitoring Requirements*
- g) Maintenance Requirements*
- h) Record Keeping and Reporting Requirements*
- i) Test Methods and Procedures*
- j) Exemptions*

PROPOSED AMENDED RULE 1178

Subdivision (a) – Purpose

The purpose of this rule is to reduce VOC emissions from storage tanks containing organic liquid located at large, high emitting petroleum facilities.

Subdivision (b) – Applicability

Applicability will be revised to clarify that determination of the 20 ton per year threshold of VOC emissions is based on Annual Emission Reports.

Removal of True Vapor Pressure threshold – Paragraph (b)(1)

The applicability threshold that subjects tanks storing material with a TVP greater than 0.1 psia to Rule 1178 was removed. PAR 1178 will not apply to tanks based on the TVP of the organic liquid stored; however, tanks storing organic liquid with TVP of 0.1 psia or less may still be exempt from all rule requirements provided a TVP demonstration of the organic liquid stored is made (see *Subdivision (j) – Exemptions*).

Subdivision (c) – Definitions

Definitions were added for clarity for new requirements, key definition changes are referenced and discussed below.

- *COMPONENT INSPECTION is monitoring for Visible Vapors with a handheld Optical Gas Imaging Device of a Storage Tank roof and individual components, including but not limited to Roof Openings and Rim Seal Systems, viewable from the tank platform, and ground for components not viewable from the tank platform but viewable at ground level.*

This is a new definition added to specify the requirements for this type of inspection.

- *EMISSION INVENTORY YEAR is the annual emission-reporting period specified by the Annual Emission Reporting Program requirements for a given year.*

This definition was modified to reflect the change in required reporting periods specified by the Annual Emission Reporting Program for different years.

- *OPTICAL GAS IMAGING DEVICE is an infrared camera with a detector capable of visualizing gases in the 3.2-3.4 micrometer waveband.*

This is a new definition to specify the capability of the OGI camera allowed to be used for required OGI inspections.

- *TANK FARM INSPECTION is monitoring for Visible Vapors with a handheld Optical Gas Imaging Device of all applicable Storage Tanks at a Facility where the person conducting the inspection views the top of the tank shell, and fixed roof or dome if applicable. Tank Farm Inspections may be conducted from an elevated position and/or from ground level.*

This is a new definition added to specify the requirements for this type of inspection.

- *VISIBLE VAPORS are any vapors detected with an Optical Gas Imaging Device during a Component or Tank Farm Inspection, when operated and maintained in accordance with manufacturer training, certification, user manuals, specifications, and recommendations.*

This is a new definition to clarify rule requirements for storage tanks that must be maintained in a condition that is free of Visible Vapors.

Subdivision (d) – Requirements

PAR 1178 includes revisions to existing requirements and new requirements. PAR 1178 establishes requirements for rim seal gaps, secondary seals, emission control systems, doming, testing, implementation and monitoring. Implementation requirements that have already been achieved have been removed for clarity and simplicity.

Secondary Seal Gap Requirements – Clause (d)(1)(C)(iii)

Gap requirements for secondary seals have been revised to reflect the stringency of gap requirements at other air districts as well as the stringency of gap requirements contained in U.S. EPA's 40 CFR 60 Subpart Kb. The lengths of gaps greater than 1/2 inch wide cannot, when totaled together, exceed 10% of the length of the circumference. The length of gaps greater than 1/8 inch wide cannot, when totaled together, exceed 30% of the length of the circumference.

External Floating Roof Tank Condition – Subparagraph (d)(1)(D)

External floating roofs tanks must be kept in a condition free of visible vapors resulting from a defect or malfunction of equipment and is determined by an optical gas imaging inspection conducted pursuant to the requirements of paragraph (f)(4).

Doming External Floating Roof Tanks – Subparagraph (d)(1)(E)

Facilities are required to install a dome on any external floating roof tank storing organic liquid with a true vapor pressure of 3 psia or greater unless permitted to contain 97% by volume crude oil. All external floating roof tanks permitted to contain 97% by volume crude oil are required to install a dome unless a permit application is submitted to limit the true vapor pressure of the crude oil to less than 3 psia within one year from date of adoption. Any external floating roof tank permitted to contain 97% by volume crude oil for which a permit application has not been submitted to limit the true vapor pressure to less than 3 psia within one year from date of adoption is subject to the doming schedule of paragraph (d)(5).

True Vapor Pressure Measurements – Subparagraph (d)(1)(F)

Facilities are required to measure and record the true vapor pressure of the organic liquid inside any external floating roof tank not equipped with a dome on a semi-annual basis (once every six months) to verify the true vapor pressure is less than 3 psia. This requirement is effective on January 1, 2024 and the first test must be conducted by July 1, 2024.

Internal/Domed External Floating/Fixed Roof Tank Condition Requirements – Subparagraphs (d)(2)(C), (d)(3)(F), and (d)(4)(C)

Internal floating roof, domed external floating roof, and fixed roof tanks are required to comply with the requirements of subparagraph (d)(1)(D) that specify the condition in which tanks must be maintained.

Condition Requirements for Domed Roof – Subparagraph (d)(2)(D)

Domes must be maintained in a condition that is free from openings that are not part of the dome design such as gaps, cracks, separations and other openings. This requirement excludes openings that are part of the dome design such as vents and access points or doors.

Secondary Seals for Internal Floating Roof Tanks – Subparagraph (d)(3)(D)

Internal floating roof tanks must be equipped with both a primary and secondary seal.

Emission Control Systems for Fixed Roof Tanks – Clause (d)(4)(A)(i)

Emission control systems required on fixed roof tanks must achieve 98% control efficiency by weight. [Based on a review of the available source test reports for emission control systems currently installed on fixed roof tanks, staff found that all met the 98% control efficiency that is](#)

proposed. Therefore, staff expects no physical modification to the equipment would be required. However, the permits should be updated to reflect the proposed 98% control efficiency.

Compliance Schedules – Paragraph (d)(5)

This paragraph contains compliance schedules for requirements of the rule for facilities currently subject to the rule, facilities that may later become subject to the rule, equipment that becomes subject to specific rule requirements on date of adoption and equipment that may later become subject to specific requirements.

Tank Requirements – Subparagraph (d)(5)(A)

This subparagraph contains existing compliance timelines for tanks to meet the requirements of Rule 1178 if the facility becomes subject to Rule 1178 after date of adoption.

Doming Compliance Schedule – Subparagraph (d)(5)(B)

Any facility or facilities under common ownership with external floating roof tanks permitted to contain 97% crude oil by volume that become subject to doming upon date of adoption are required to dome one-third of their applicable tanks by December 31, 2031, half of their applicable tanks by December 31, 2033 and all their applicable tanks by December 31, 2038. Tanks for which a permit application has been submitted to limit the TVP of the crude oil to less than 3 psia are considered an applicable tank.

Alternative Doming Compliance Schedule for Certain Facilities– Subparagraph (d)(5)(C)

Any facility that has 12 or more tanks subject to doming at a single location where at least five or more subject tanks are 260 feet in diameter or larger may opt to use the compliance schedule in this subparagraph. These facilities must dome one-fourth of their applicable tanks by the end of 2030, half of their applicable tanks by the end of 2036, three-fourths of their applicable tanks by the end of 2040, and all their applicable tanks by the end of 2041.

Crude Oil External Floating Roof Tanks Later Subject to Doming – Subparagraph (d)(5)(D)

Any crude oil external floating roof tanks that become subject to doming requirements after the date of adoption due to exceeding the permit limitation for true vapor pressure of less than 3 psia must install a dome within three years of exceeding the true vapor pressure limit and becoming subject to the doming requirement.

Internal Floating Roof Tank Requirements – Subparagraph (d)(5)(E)

Any internal floating roof tanks not equipped with a secondary seal are required to have a secondary seal installed the next time the tank is emptied and degassed starting two years after date of adoption. All internal floating roof tanks must have a secondary seal installed no later than 10 years after date of adoption.

Subdivision (f) – Inspection and Monitoring Requirements

Emission Control Systems for Fixed Roof Tanks – Paragraph (f)(3)

Existing requirement for annual performance tests and operating parameter monitoring for emission control systems. Performance tests and operating parameters must now demonstrate an overall control efficiency of 98%.

Optical Gas Imaging (OGI) Inspections – Paragraph (f)(4)

Optical gas imaging inspections are required to determine compliance with the requirement for tanks to be maintained in a condition that is free of visible vapors resulting from a defect or malfunction of equipment. This paragraph contains the requirements for OGI inspections.

Certification/Training of Person Conducting OGI Inspection – Subparagraph (f)(4)(A)

Contains requirements for qualification for the persons conducting an OGI inspection. Persons conducting the OGI inspection must be certified or have undergone training for the camera used provided by the manufacturer of the OGI camera. The persons conducting the inspections must also complete all subsequent training or certification recommended by the OGI manufacturer. This paragraph also contains requirements for proper operation and maintenance of the OGI device. The OGI camera must be operated and maintained in accordance with all manufacturer guidance including but not limited to that stated in any training or certification course, user manuals, specifications, recommendations.

Tank Farm Inspection Requirements – Subparagraph (f)(4)(B)

Contains requirements for tank farm inspections.

Frequency (Tank Farm Inspection) – Clause (f)(4)(B)(i)

Inspections must be conducted at least once every calendar week.

Procedure (Tank Farm Inspection) – Clause (f)(4)(B)(ii)

An inspector is required to monitor for visible vapors with a tank farm inspection as defined. If visible vapors are detected during a tank farm inspection, an inspector must conduct an additional inspection from the tank's platform to make an effort to determine the source of emissions. From the platform, an inspector will use an OGI device to inspect components required to be maintained vapor tight or with no visible gaps, viewable from the tank platform. If visible vapors are detected from any components that are required to be maintained in a vapor tight condition or in a condition with no visible gaps, the facility must demonstrate compliance with applicable rule requirements for any component from which visible vapors are emitted or make a repair, within three days of identifying the visible vapors. If visible vapors are detected from the roof or other components not required to be vapor tight or with no visible gaps, the inspector must conduct a visual inspection to identify any defects in equipment from which visible vapors are emitted. Defects may include, but are not limited to, equipment that is not operating as intended, equipment not found in good operating condition, equipment not meeting all the requirements of the rule, or other indicators that equipment has failed (e.g., organic liquid pooled on a floating roof). The visual inspection for defects may include the use of an OGI device. If no defects are identified, no further action is required for the inspection. If a defect is identified, a repair must be made within three days.

Alternative Option (Tank Farm Inspection) – Clause (f)(4)(B)(iii)

If an inspector performs an inspection required by clause (f)(4)(B)(ii) on a tank and determines that no demonstrations or repairs are required pursuant to subclauses (f)(4)(B)(ii)(A) and (f)(4)(B)(ii)(B), the inspector has the option to record the visible vapors from that tank to use as a baseline to determine an increase in emissions during subsequent weekly tank farm inspections for that tank. If visible vapors are detected from that tank during subsequent tank farm inspections and

do not indicate an increase in emissions when compared to the baseline emissions, the inspector does not need to perform an inspection from the tank platform required by clause (f)(4)(B)(ii); however, this applies only for the weekly inspections in the same calendar month that the baseline emissions were determined.

Component Inspections – Subparagraph (f)(4)(C)

Contains requirements for component inspections. Component inspections include monitoring of individual components including, but not limited to rim seals, pressure-vacuum vents, hatches, guidepoles, roof legs, emission control system connections and vents.

Frequency (Component Inspection) – Clause (f)(4)(C)(i)

Inspections must be conducted at least once every six months for floating roof tanks ~~at facilities not complying with the doming schedule of subparagraph (d)(5)(B)~~. Component inspections may be conducted during other required semi-annual inspections.

Procedure (Component Inspection) – Clauses (f)(4)(C)(ii)-(iii)

Repairs or demonstration with applicable rule requirements must be conducted when visible vapors are detected from any component or equipment, except for rim seal systems. Repairs or demonstrations with rim seal requirements must be conducted a defect is visible from the tank platform and when visible vapors are emitted from the rim seal and are also detectable at the top of the tank shell or from roof vent.

Subdivision (g) – Maintenance Requirements

Contains maintenance requirements for tanks that do not meet the requirements of the rule.

Maintenance Requirements – Subdivision (g)

Contains maintenance and repair schedules.

Repairs Schedules – Paragraph (g)(2)

Contains repair schedule for tanks found in non-compliance during an OGI inspection. Repairs or adjustments must be made within three days of identifying visible vapors requiring a repair determined pursuant to paragraph (f)(4).

Reporting and Recordkeeping Requirements – Subdivision (h)

Reporting and Recordkeeping Requirements – Paragraph (h)(1)

Contains updated recordkeeping and reporting requirements for inspections required by paragraphs (f)(1) through (f)(3). Revised to allow electronic reports and electronic submittal. Electronic reports must contain all information required by the Compliance Report Form in Appendix A. Electronic submittals must be sent to the email address designated by the Executive Officer.

Reporting and Recordkeeping Requirements for OGI Inspections – Paragraph (h)(2)

Contains notification and recordkeeping requirements for OGI inspections.

Reporting for OGI Inspections – Subparagraph (h)(2)(A)

Contains reporting requirements for tank farm inspections. Facilities must report to 1-800-CUT-SMOG when visible vapors are detected during a tank farm inspection that require a demonstration with rule requirements or a repair pursuant to the requirements of clause (f)(4)(B)(ii) within 24 hours of identifying the visible vapors.

Records for Tank Farm Inspections – Subparagraph (h)(2)(B)

Contains recordkeeping requirements for tank farm inspections. Written and digital records must be kept for findings of visible vapors resulting from a defect in equipment or from components required to be vapor tight or with no visible gap.

Records for Component Inspections – Subparagraph (h)(2)(C)

Contains recordkeeping requirements for component inspections.

Written Reports of Non-Compliance – Paragraph (h)(3)

Revised to allow electronic submittal of written reports required by this paragraph.

Records of True Vapor Pressure – Paragraph (h)(6)

Revised paragraph to include requirement to keep records of true vapor pressure test results, and type of organic liquid stored that is required by paragraph (j)(4).

*Test Methods and Procedures – Subdivision (i)*Test Method for Organic Liquids in External Floating Roof Tanks – Paragraph (i)(4)

To demonstrate compliance with the requirement to store only organic liquids with a true vapor pressure of less than 3 psia in an external floating roof tank without a domed roof, a facility may use ASTM Method D-6377 and correlate results to ASTM D-323.

Exemptions – Subdivision (j)

Contains criteria for exemption from all or some of the requirements of the rule.

Exemption from Doming – Paragraph (j)(3)

Modified to clarify that tanks with a permit condition limiting the true vapor pressure of the organic liquid stored to less than 3 psia are exempt from doming requirements only if the organic liquid stored in the tank has a true vapor pressure less than 3 psia as demonstrated by required testing.

Exemption for Tanks Storing Organic Liquid with Low True Vapor Pressure – Paragraph (j)(4)

Specifies conditions in which tanks storing organic liquid with low TVP are exempt from certain rule requirements. Tanks storing organic liquid with TVP of 0.1 psia or less are exempt from all requirements of the rule provided that the owner or operator tests the TVP of the organic liquid at least every five years for refined organic liquid or products meeting specifications for sale and at least annually for all other organic liquids, and demonstrates a TVP of 0.1 psia or ~~less~~ ~~lower~~. Instead of testing, a facility may use a method specified in a permit condition for demonstrating the true vapor pressure of a liquid stored such as a material safety data sheet that specifies the true vapor

pressure of a material. The first test must be conducted on or before July 1, 2024, or within one month of refilling a tank that is out of service after July 1, 2024.

If an organic liquid that qualifies for exemption is not stored in the tank at the time a test is required, a facility must test when the tank is refilled with an organic liquid that qualifies for the exemption within one month from refilling. The facility is also required to keep records of the contents stored in the tanks and the duration as well as records of the tests conducted for the contents of the tank.

Exemption from Doming for Crude Oil Tanks – Paragraph (j)(5)

Crude oil tanks that become subject to doming requirements upon date of adoption may be exempt from doming if a permit application is submitted to limit the crude oil TVP to ~~less~~lower than 3 psia within one year from date of adoption. Any crude oil tank for which a permit application is not submitted to limit the TVP to ~~less~~lower than 3 psia within one year from date of adoption is subject to the doming requirements and doming schedule, including tanks storing crude oil with a TVP of less than 3 psia.

Exemption from OGI Inspections – Paragraph (j)(6)

Any tank that is empty or opened to the atmosphere and complying with the requirements of Rule 1149 is exempt from OGI inspections. OGI inspections must resume once the tank is refilled.

Exemption from OGI Inspections Due to Safety– Paragraph (j)(7)

If a facility or person responsible for conducting an OGI inspection at a facility determines that it is unsafe to climb a tank due to safety concerns such as wind or slippery surfaces from rain, the facility is not required to conduct an inspection from the tank platform. A platform inspection for tanks that were identified as having visible vapors during a tank farm inspection must be conducted the first day the facility or person responsible for conducting the OGI inspection determines it safe to do so. An owner or operator is required to document the date that a required inspection was not completed and the reason.

Exemption Removals

Former paragraph (j)(2) - Removed exemption for secondary seals for domed external floating roof tanks. All domed external floating roof tanks subject to the rule must have secondary seal installed.

Former paragraph (j)(7) – Removed exemption from doming for tanks permitted to contain more than 97% by volume crude oil. Any tank organic liquid with true vapor pressure of 3 psia or greater are required to install a dome unless otherwise stated in the rule.

CHAPTER 4: IMPACT ASSESSMENT

INTRODUCTION

EMISSION REDUCTIONS

COSTS AND COST-EFFECTIVENESS

SOCIOECONOMIC ANALYSIS

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) ANALYSIS

**DRAFT FINDINGS UNDER HEALTH AND SAFETY CODE SECTION
40727**

COMPARATIVE ANALYSIS

INCREMENTAL COST-EFFECTIVENESS

INTRODUCTION

Impact assessments were conducted as part of PAR 1178 rule development to assess the environmental and socioeconomic implications of PAR 1178. These impact assessments include emission reduction calculations, cost-effectiveness and incremental cost-effectiveness analyses, a socioeconomic assessment, and a California Environmental Quality Act (CEQA) analysis. Staff prepared draft findings and a comparative analysis pursuant to Health and Safety Code Sections 40727 and 40727.2, respectively.

EMISSION REDUCTIONS

PAR 1178 will establish more stringent control and monitoring requirements that result in emission reductions. The proposed amendments will increase the stringency of existing requirements for seals, emission control systems, doming, and monitoring. Emission reductions were calculated based on estimated baseline emissions and the expected efficacy for the proposed control or monitoring requirement. TankESP PRO software was used to determine baseline emissions and emission reductions for proposed control requirements. This software calculates tank emissions based on emissions estimate procedures from Chapter 7 of U.S. EPA's Compilation of Air Pollutant Emission Factors for VOC emissions from storage tanks. Calculated emissions are based on many parameters such as tank diameter, tank height, controls, location of tank, product stored, characteristics of product stored and product throughput. U.S. EPA's estimates for uncontrolled tanks contained in the 2016 CTG were used to determine baseline emissions in the cost-effectiveness analysis for implementing OGI inspections. The total estimated emission reductions from the implementation of PAR 1178 is 0.82 ton per day.

Secondary Seals

TankESP PRO software was used to calculate emission reductions from adding secondary seals to internal floating roof tanks not equipped with secondary seals and storing organic liquid with TVP greater than 0.1 psia (8 tanks total). Baseline emissions for the eight tanks are 0.012 ton per day. The total VOC emission reductions from installing secondary seals on eight internal floating roof tanks are 0.01 ton per day.

Secondary Seal Gap Requirements

TankESP PRO was used to estimate emission reductions from requiring more stringent gap requirements. The associated VOC emission reductions are expected to be 0.01 ton per day.

Vapor Recovery

TankESP PRO was used to calculate emission reductions from increasing emission control efficiency from 95% to 98%, by weight, for tanks reported to store organic liquid with TVP greater than 0.1 psia connected to emission control systems. Tanks connected to fuel gas systems (typically found at refineries) were not included in the analysis. The 2021 Annual Emission Reports were used to identify the fixed roof tanks that store organic liquid with TVP greater than 0.1 psia and determine throughput. Baseline VOC emissions for fixed roof tanks are 0.12 ton per day. The VOC emission reductions associated with increasing emission control system efficiency to 98% by weight from 95% by weight are 0.07 tons per day.

Doming

TankESP PRO was used to calculate emissions reductions from doming. Fifty-four external floating roof tanks were identified as crude oil tanks. Staff used 2019 Annual Emission Reports to identify which tanks stored crude oil and the throughput for each tank. It was determined that reported throughputs in 2019 were more representative of normal operations compared to years 2020 and 2021 since the COVID-19 pandemic may have affected operations. The total VOC emission reductions from doming over the life of the equipment (50 years) is 2,259 tons, or 0.12 ton per day.

Reid Vapor Pressure (RVP)

Vapor pressure of organic liquid stored significantly affects emissions from a tank. Currently, in Rule 1178, doming is required for tanks storing material with a TVP of 3 psia or greater, except for crude oil tanks that are currently exempt from doming requirements. The TVP of crude oils can vary greatly since it is not a material that is refined to specification. Staff reviewed the TVPs for crude oil reported by facilities on tank inspection reports. The method used by facilities to determine the vapor pressures reported is unknown and may vary between facilities. Several inspection reports did not state a vapor pressure for the crude oil stored. The reported RVPs in 2020 inspection reports ranged from 1.77 psia to 7.87 psia for crude oil stored in external floating roof tank. Since all inspection reports did not have RVP information, staff took the average reported RVP in the 2020 inspection reports within two standard deviations to determine a maximum RVP of crude oil stored in external floating roof tanks. The resulting RVP was 8.19 psia and was used as the value in TankESP PRO to determine the VOC emission reductions from doming. Upon review of 2019 inspection reports, a more complete data set was obtained for reported RVP values of crude. The highest reported value was 8.14 psia. Using 8.14 psia as the RVP value in TankESP PRO also resulted in 0.12 ton per day of VOC emission reductions.

PAR 1178 will require doming on all external floating roof tanks storing material with a TVP of 3 psia or greater, including crude oil tanks. Baseline VOC emissions used in the cost-effectiveness analysis is based on maximum actual TVP of crude oil stored. The total VOC emission reductions based on permitted TVP limits and rule limits (11 psia) is 0.28 ton per day.

OGI Monitoring

Baseline emissions were estimated using emission factors established in U.S. EPA's 2016 Control Technology Guidelines for Oil and Gas Industry. Table 4-2 of the 2016 CTG contains emission estimates for an uncontrolled tank expressed in tons of VOC per year for different brackets of throughput in barrels per day. The average throughput of fixed roof tanks storing crude oil was used to determine the bracket to consider for estimating emissions from an uncontrolled tank. The average throughput was 7,537 barrels per day which corresponded to estimated emissions of 1,464 tons per year. Staff compared the resulting emission estimate using U.S. EPA factors to measured emissions from a 2015 emissions study that South Coast AQMD conducted with monitoring technology companies. Measured VOC emissions attributed to a malfunctioning pressure vacuum vent on a crude fixed roof tank was about 4.5 tons per day whereas the estimated losses from an uncontrolled crude oil tank based on Table 4-2 of the 2016 CTG is about 4 tons per day.

To estimate baseline emissions from leaks, staff assumed that one large leak would occur from only one tank out of all tanks subject to Rule 1178, once each year. The shortest frequency between

inspections currently required is 90 days (quarterly inspections). Staff assumed that a leak would occur 45 days after an inspection (45 days before the next quarterly inspection). Total emissions using the emission factors in Table 4-2 of the 2016 CTG and the assumption that a leak would occur 45 days before the next quarterly inspections and once per year results in baseline emissions of 180 tons per year.

The amount of VOC emission reductions achievable depend on the monitoring frequency. Emission reductions resulting from conducting monitoring at different frequencies were analyzed. PAR 1178 will require weekly and semi-annual OGI inspections. The estimated VOC emission reductions from weekly and semi-annual OGI inspections are 0.45 ton per day and based on the assumption that a leak would occur 3.5 days (1/2 the inspection frequency) after the previous inspection. Figure 4.1 shows the VOC emission reductions associated with different monitoring frequencies, including weekly inspections.

Figure 4.1 Estimated Emission Reductions for Different Monitoring Methods



COSTS AND COST-EFFECTIVENESS

Health and Safety Code Section 40920.6 requires a cost-effectiveness analysis when establishing BARCT requirements. The cost-effectiveness of a control is measured in terms of the control cost in dollars per ton of air pollutant reduced. The costs for the control technology include purchasing, installation, operation, maintenance, and permitting. Emission reductions were calculated for each requirement and based on estimated baseline emissions. The 2022 AQMP established a cost-effectiveness threshold of \$36,000 per ton of VOC reduced. A cost-effectiveness that is greater than \$36,000 per ton of VOC reduced requires additional analysis and a hearing before the Governing Board on costs. The cost-effectiveness is estimated based on the present value of the retrofit cost, which was calculated according to the capital cost (initial one-time equipment and installation costs) plus the annual operating cost (recurring expenses over the useful life of the control equipment multiplied by a present worth factor). Capital costs are one-time costs that cover the components required to assemble a project. Annual costs are any recurring costs required to operate equipment. Costs were obtained for secondary seals, domes, and monitoring with OGI from facilities and suppliers.

Doming

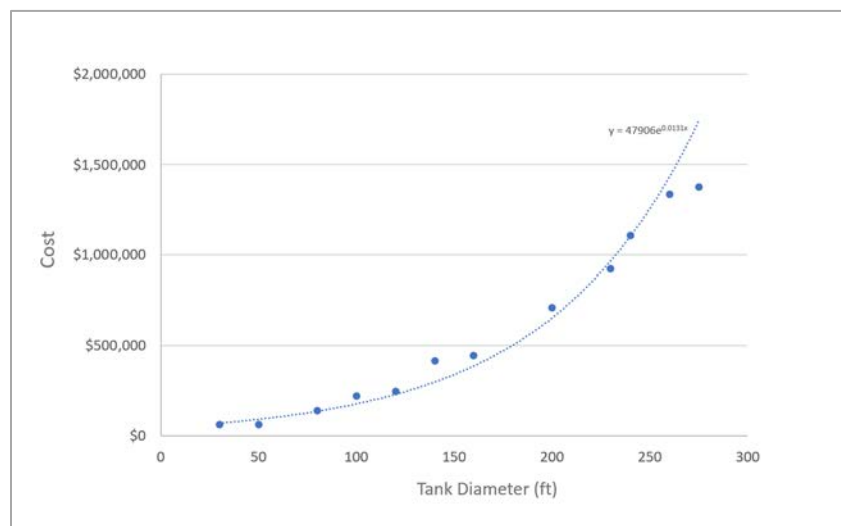
PAR 1178 will require domes on external floating roof tanks storing crude oil, currently exempt from doming requirements. According to 2019 AERs, 54 tanks were reported to have stored crude. Information about doming, including cost information, was obtained from facilities, dome suppliers, and dome maintenance service providers. Emission reductions were calculated with TankESP PRO software. Total cost-effectiveness to dome 54 crude oil tanks is \$36,800 per ton of VOC reduced.

Costs

Costs were obtained from facilities, dome suppliers, and dome maintenance service providers. Four cost-effectiveness analyses were conducted and based on the information provided to staff throughout the rule development. The first analysis was based on cost information from dome suppliers for equipment and installation. After that analysis, facilities provided cost information from past projects and another cost-effectiveness analysis was conducted. After the second analysis, facilities provided additional cost information for past and projected projects and staff conducted a third analysis based solely on cost information provided by facilities. After the third analysis, stakeholders commented that operating and maintenance costs must be considered in the analysis. A fourth cost-effectiveness analysis was conducted that included operating and maintenance (O&M) costs.

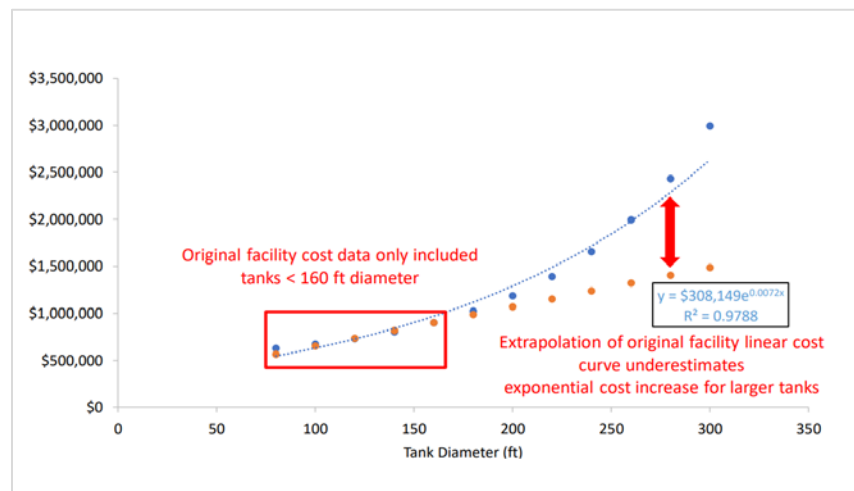
The first cost-effectiveness calculation relied on costs provided by three dome suppliers for equipment and installation. Additional costs for creating space for dome assembly, crane rental and union labor were assumed. A 25-year equipment life was assumed based on the assumption used for the cost-effectiveness for doming in Rule 1178 adoption in 2001. Costs ranged from approximately \$100,000 to \$1.75 million dollars for tanks ranging in size from 30 to 275 feet in diameter. Figure 4.2 shows the cost curve based on estimates from dome suppliers for equipment and installation.

Figure 4.2 - Vendor Cost Curve



Facilities informed staff of additional expenses associated with doming and provided costs for doming tanks 160 feet in diameter and smaller. Costs provided were based on vendor quotes and past projects adjusted to reflect current day dollars. A 50-year equipment life was assumed based on current information provided by dome suppliers. Two dome suppliers estimated a 50-year useful life, while one dome supplier estimated 30 years of useful life for a tank exposed to precipitation and additional load from snowfall. Staff determined that a 50-year useful life is reasonable and consistent with the condition of domes observed installed almost 20 years ago. A hybrid cost curve was created using vendor and facility cost data. To create the hybrid cost curve, staff added a calculated premium based on costs provided by facilities to the costs provided by vendors to reflect actual project costs. Costs ranged from approximately \$383,000 to \$2.25 million dollars for tanks ranging in size from 30 to 275 feet in diameter. Figure 4.3 shows the hybrid cost curve based on facility information for tanks less than or equal to 160 feet in diameter and vendor quotes for tanks ranging in size from 75 to 300 feet in diameter.

Figure 4.3 - Hybrid Cost Curve



After the second cost-effectiveness analysis, facilities provided additional cost information for doming 33 tanks, including tanks larger than 200 feet in diameter. Another cost-effectiveness analysis was performed and relied solely on facility data for total equipment and installation costs. Costs ranged from approximately \$165,000 to \$2.89 million dollars for tanks ranging in size from 30 to 275 feet in diameter. Figure 4.4 shows the cost curve for equipment and installation based on information provided by seven facilities. Figure 4.5 shows the resulting cost curves for each iteration. The total cost for equipment and installation for 54 crude oil tanks is \$55,127,494.

Figure 4.4 - Facility Cost Curve

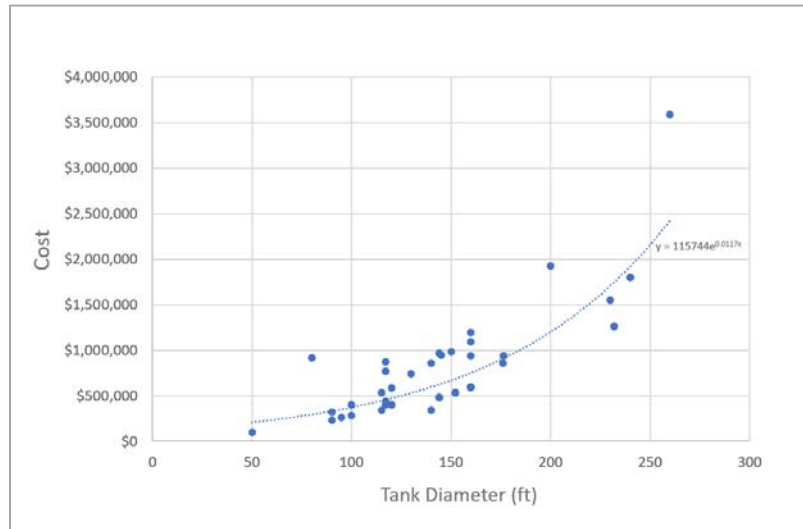
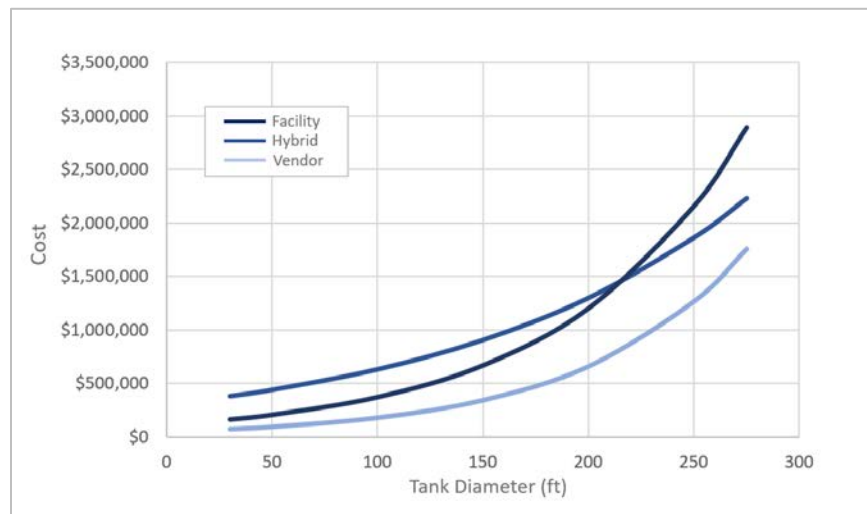


Figure 4.5 - Cost Curve Comparison



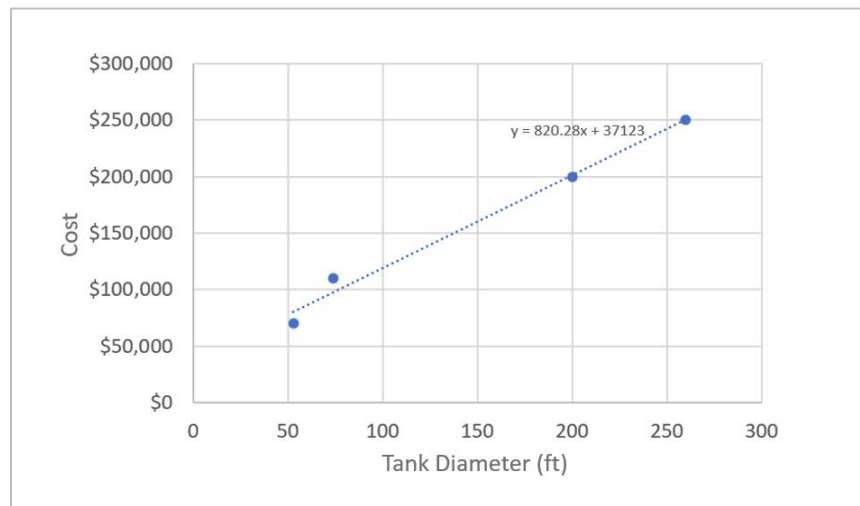
Operating and Maintenance (O&M) Costs

Dome suppliers, dome maintenance providers, and facilities provided information about maintenance required to keep a dome in good operating condition. The typical maintenance for domes involves re-sealing of seams. Common signs of degrading seals and gaskets include panels pulling away from seams or bolts beginning to uplift from seams. One dome supplier stated that, over 46 years of operation, they have only witnessed the need for minimal maintenance to gaskets and seals. This supplier estimated that a complete re-seal or re-gasket may be needed after 20 years of dome service. Two dome maintenance service providers stated that typical maintenance they perform involves preparing the aluminum surface and applying a sealant or tape to the hubcaps and seams. The dome maintenance service providers estimated that re-sealing would be required

every 10 to 25 or more years. One facility stated that they apply caulking to seal gaps on the dome and estimated that they would need to seal the dome about every 20 years.

Costs were obtained from the dome maintenance service providers for tanks of different diameters. The cost-analysis assumes that maintenance would be required every 20 years (1.5 times throughout the 50-year life of the dome). The maintenance cost was estimated at \$70,000 for a 53-foot diameter tank, \$100,000 for a 74-foot diameter tank, \$200,000 for a 200-foot diameter tank, and \$250,000 for a 260-foot diameter tank. The cost curve used to estimate O&M costs for tanks of different diameters is shown in Figure 4.6. The discounted cash flow method at 4% was applied to determine total O&M cost. The total cost for O&M for 54 tanks is \$6,193,440 over 50 years.

Figure 4.6 – O&M Cost Curve



Loss of Capacity and Productivity Costs

In addition to equipment and installation costs, costs were considered for loss of storage capacity. Some facilities stated that tanks would be required to be taken out of service for dome installation. Although not all facilities stated they would take tanks out of service for dome installation, staff considered costs for storage leasing. Two facilities estimated storage leasing costs at approximately \$0.50 per barrel. Staff is aware of two facilities that would potentially rent storage offsite if a tank was out of service for doming. One facility can accommodate facility demand without renting additional storage but would potentially incur a loss of production if additional crude was available to purchase while a tank was out of service. The other facility would need to lease storage offsite to maintain operations. Staff considered storage leasing costs for the facility that would be required to lease off-site storage during doming construction to maintain operation. Based on facility and dome supplier information, it is assumed that a tank would be removed from service for 12 weeks to install a large dome approximately 200 feet in diameter and removed from service for approximately six weeks for an API 653 internal inspection. Since facilities can install a dome while a tank is out of service for an API 653 internal inspection, costs for storage leasing were only considered for six weeks which is the number of weeks a tank would be out of service due only to doming. The total cost included for storage leasing was based on average daily throughput obtained from 2019 AERs, the number of days beyond an API inspection that the tank is out of service for doming, and the cost of \$0.50 per barrel. The total cost included for storage leasing is \$2,240,422. Costs for loss of productivity were not considered.

Implementation and Costs

The proposed implementation schedule for doming has a significant effect on cost-effectiveness. Facilities periodically empty and degas tanks for API 653 internal inspections. These inspections are conducted every 10 to 30 years, depending on certain specifications of a tank. To reduce costs associated with doming, staff considered the facilities' API 653 inspection schedules that indicate when a tank would already be emptied or degassed for the internal inspection. Cleaning and degassing costs are potentially significant costs and can, in some cases, be more costly than the cost of equipment and installation for doming. Facilities and dome suppliers have informed staff that a tank is not required to be out of service (emptied and degassed) while a dome is constructed and installed, however, some facilities would be required to remove a tank from service for safety reasons. Although not all tanks will be taken out of service for doming, the cost-effectiveness analysis assumes all tanks would require cleaning and degassing prior to dome installation.

Facilities provided staff with API 653 internal inspection schedules for crude oil external floating roof tanks. The impact on cost-effectiveness from requiring full implementation of doming by certain dates was analyzed. Prior to including O&M costs, the soonest implementation date that resulted in cost-effectiveness below \$36,000 per ton VOC reduced threshold, was 2038. Adding O&M costs increased cost-effectiveness to \$36,800 per ton of VOC reduced. Staff proposes to retain full implementation in 2038.

Cost estimates for cleaning and degassing were obtained for five facilities and one cleaning and degassing service provider. A cost curve based on the cost estimates received was used to estimate cleaning and degassing costs and is shown in Figure 4.7. The total costs for cleaning and degassing tanks with API schedules beyond 2038 is \$13,795,837. Table 4.1 shows equipment, install, and O&M costs, and emission reductions for each tank proposed to be domed.

Figure 4.7 – Cleaning and Degassing Cost Curve

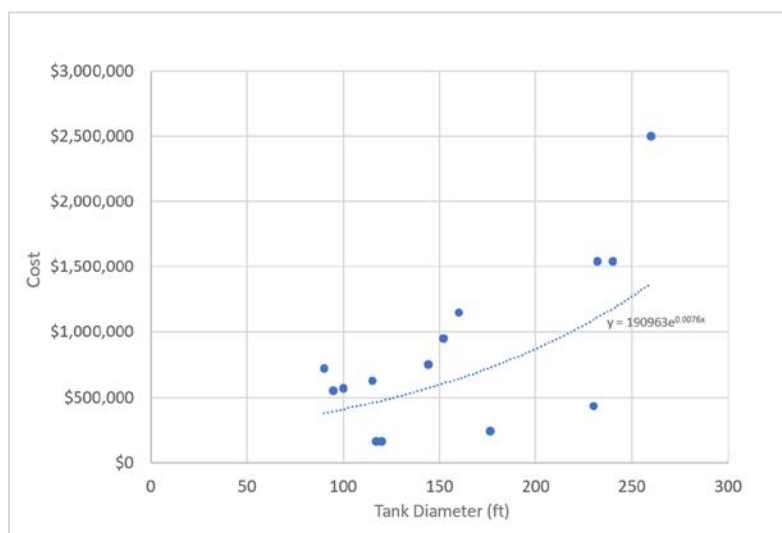


Table 4.1 – Summary of Costs and Reductions

Tank No.	Diameter (ft)	Equip+Install	O&M (50 years)	Reductions (tons/50 yrs)
1	117	\$454,992	\$85,775	36.45
2	117	\$454,992	\$85,775	35.72
3	218	\$1,483,235	\$139,167	40.08
4	218	\$1,483,235	\$139,167	40.08
5	160	\$752,485	\$108,506	29.78
6	195	\$1,133,291	\$127,009	36.58
7	160	\$752,485	\$108,506	29.78
8	90	\$331,750	\$71,502	17.63
9	138	\$581,715	\$96,876	42.00
10	134	\$555,118	\$94,762	40.80
11	120	\$471,246	\$87,361	22.65
12	120	\$471,246	\$87,361	23.00
13	117	\$454,992	\$85,775	36.45
14	230	\$1,706,809	\$145,511	42.47
15	176	\$907,398	\$116,965	32.98
16	176	\$907,398	\$116,965	32.98
17	144	\$624,019	\$100,048	43.65
18	95	\$351,736	\$74,145	30.09
19	115	\$444,469	\$84,718	35.89
20	144	\$624,019	\$100,048	43.65
21	152	\$685,248	\$104,277	47.02
22	152	\$685,248	\$104,277	47.02
23	144	\$624,019	\$100,048	43.65
24	160	\$752,485	\$108,506	29.78
25	160	\$752,485	\$108,506	30.30
26	160	\$752,485	\$108,506	30.30
27	160	\$752,485	\$108,506	30.30
28	100	\$372,926	\$76,788	19.60
29	160	\$752,485	\$108,506	30.30
30	160	\$752,485	\$108,506	30.30
31	144	\$624,019	\$100,048	41.63
32	144	\$624,019	\$100,048	42.57
33	144	\$624,019	\$100,048	42.57
34	144	\$624,019	\$100,048	41.63
35	144	\$624,019	\$100,048	41.63
36	144	\$624,019	\$100,048	41.63
37	144	\$624,019	\$100,048	41.63
38	144	\$624,019	\$100,048	27.50
39	221	\$1,536,221	\$140,753	40.56

40	221	\$1,536,221	\$140,753	40.56
41	201	\$1,215,707	\$130,180	37.12
42	210	\$1,350,704	\$134,938	38.70
43	227	\$1,647,939	\$143,925	35.18
44	220	\$1,518,352	\$140,225	31.09
45	230	\$1,706,809	\$145,511	100.28
46	260	\$2,424,501	\$161,370	49.08
47	260	\$2,424,501	\$161,370	22.84
48	229	\$1,686,956	\$144,982	49.14
49	260	\$2,424,501	\$161,370	82.34
50	260	\$2,424,501	\$161,370	130.76
51	227	\$1,647,939	\$143,925	66.01
52	242	\$1,964,083	\$151,855	51.10
53	260	\$2,424,501	\$161,370	105.66
54	100	\$372,926	\$76,788	26.08
Total		\$55,127,494	\$6,193,440	2258.58

Additional capital costs were added for fire suppression systems and permitting. Fire suppression systems are not required for tanks located at non-refineries; however, costs for fire suppression systems were applied for all tanks. A total of \$5,670,000 (\$105,000 each system) was added for fire suppression systems. A total of \$515,106 was added for permitting 54 tanks (\$9,539 each tank based on the current fee schedule in South Coast AQMD Rule 301 – Permitting and Associated Fees).

Cost-Effectiveness

The total cost to dome 54 tanks includes equipment, installation, permitting, cleaning and degassing (18 tanks only), storage leasing, and O&M is \$82,978,046. The total reductions over 50 years are 2,258.6 tons. The cost-effectiveness to dome 54 external floating roof tanks is \$36,738 per ton of VOC reduced. A summary of costs is shown below in Table 4.2.

Table 4.2 – Total Costs for Doming

Type of Cost	Dollar Amount
Equipment and installation	\$55,127,494
Cleaning/degassing	\$13,795,837
O&M	\$6,193,440
Fire suppression	\$5,670,000
Permitting	\$515,106
Storage leasing	\$2,240,422
Total Cost	\$82,978,046

Secondary Seals

PAR 1178 would require secondary seals on all floating roof tanks. Eight internal floating roof tanks were initially identified that are not equipped with secondary seals and store material with TVP greater than 0.1 psia. Cost information was obtained from facilities and secondary seal suppliers. Methods for estimating costs and reductions are discussed below.

Costs

Cost estimates were obtained from suppliers, one facility, and reported costs in the Rule 1178 adoption staff report that were adjusted to current dollars. Total costs ranged from \$163 per foot installed and \$297 per foot installed. Suppliers estimated that the equipment life of stainless-steel components were 20 years and that rubber components are expected to last 10 years. The average cost of \$220 per liner foot was used. Permitting costs were calculated and included based on South Coast AQDM Rule 301. O&M costs were considered to replace rubber components every 10 years after installation of a complete seal with a 20-year equipment life. Costs were estimated at \$42 per linear foot from one supplier to replace rubber components.

Implementation and Costs

Staff is proposing to require the installation of secondary seals when the tank is next emptied and degassed and no later than 10 years from date of adoption. Suppliers stated that tanks would not be required to be emptied and degassed for installation of a secondary seal, however, one facility stated that it is facility practice for a tank to be emptied and degassed prior to installing a secondary seal to ensure the safety of personnel. No costs were considered for emptying and degassing the tank since installation of the secondary seal is required when the tank is already emptied or degassed.

Cost-Effectiveness

The total cost to install secondary seals on eight internal floating roof tanks is \$429,106. Total VOC emission reductions over 20 years are 18.8 tons. The cost-effectiveness to install secondary seals is \$22,800 per ton of VOC reduced. Table 4.3 provides a summary of the costs and reductions for requiring secondary seals on eight floating roof tanks.

Table 4.3 – Summary of Costs and Reductions

Diameter (ft)	Secondary Seal Needed (ft)	Seal Cost equip+install (\$220/ft)	Rubber Replacement equip+install (\$42/foot)	Permitting Cost	Total Cost (20 years)	Tons Reductions (20 years)
60	189	\$41,580	\$7,938	\$9,000	\$58,518	6.6
50	157	\$34,540	\$6,594	\$9,000	\$50,134	2.9
30	94	\$20,680	\$3,948	\$9,000	\$33,628	1.34
33.5	105	\$23,100	\$4,410	\$9,000	\$36,510	3.68
66	208	\$45,760	\$8,736	\$9,000	\$63,496	1.09
66	208	\$45,760	\$8,736	\$9,000	\$63,496	1.09
64	201	\$44,220	\$8,442	\$9,000	\$61,662	1.05
64	201	\$44,220	\$8,442	\$9,000	\$61,662	1.05
TOTAL	1,363	299,860	\$57,246	\$72,000	\$429,106	18.8

Subsequent to the release of the Draft Staff Report and cost-effectiveness determination for secondary seals, staff identified two additional facilities subject to PAR 1178 that will be required to install secondary seals on their internal floating roof tanks pursuant to the proposed requirement. It is expected that 16 additional internal floating roof tanks will be required to install secondary seals. The cost-effectiveness remains \$22,800 per ton of VOC reduced for installation of secondary seals.

Enhanced Leak Detection

A cost-effectiveness analysis was conducted for the implementation of continuous monitoring using fixed gas sensors, open path detection devices, and fixed OGI devices. A cost-effectiveness analysis was also conducted for implementing periodic OGI inspections with a handheld OGI device. An example facility with 22 tanks was used to estimate and compare costs for continuous monitoring systems if implemented for 1,038 tanks (number of tanks identified subject to Rule 1178 at the time the cost-effectiveness was calculated). Figure 4.8 shows the example facility used for cost comparisons.

Figure 4.8 – Example Facility for Cost Comparison

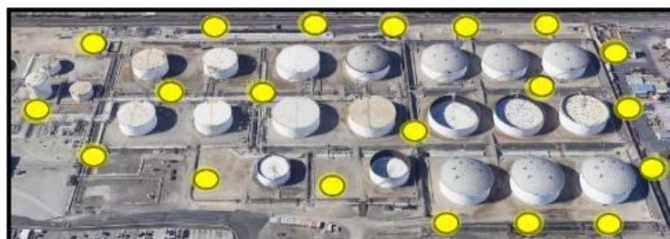


Costs

Continuous Monitoring - Fixed Gas Sensors

Costs were obtained from two suppliers of fixed gas sensors. One supplier quoted equipment costs at \$1,800 per unit, including installation. Annual costs are \$400 per month per unit and include access to high level emissions data, calibration, bump tests, and produced reports. Sensors would require replacement every six months and cost \$1,800 per unit. Installation does not include any structures that may be built to position the sensor at an optimal height or position. It is estimated that 20 sensors are required to detect very large leaks at the example tank farm. Figure 4.9 shows how a gas sensor network would be implemented at the example tank farm.

Figure 4.9 – Implementation of Gas Sensor Network (Example)



Total annual cost to implement a network of 20 gas sensors is \$168,000. Gas sensor networks provided as a service are also available. The sensor network is installed, owned, and operated by the supplier. The cost is approximately \$10,000 per year per sensor. The total estimated cost for a sensor network provided as a service at the example tank farm is \$200,000 per year.

Continuous Monitoring - Open Path

Two open path providers were contacted to obtain information about open path detection. Limited information was provided about the technology and no cost information obtained. Equipment costs were obtained from one facility currently using open path devices for fenceline monitoring. Installation and maintenance were not included in the facility cost estimate. A percentage of equipment costs was used to estimate installation and maintenance. The open path devices were estimated at \$190,000 per device. Installation costs were assumed equal to equipment costs. Annual maintenance costs were assumed equal to OGI maintenance costs, approximately \$5,000 per unit. Staff estimated five open path devices are required to detect large leaks at the example tank farm. Figure 4.10 shows how open path detection would be implemented at the example tank farm.

Figure 4.10 – Implementation of Open Path Detection (Example)



Total annual costs to implement a network of five open path devices is \$115,000 and is based on 20-year useful life of the equipment.

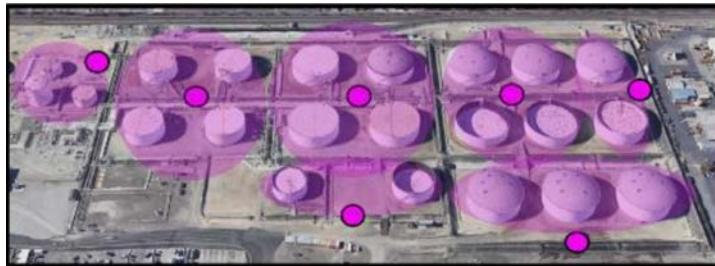
Continuous Monitoring – Optical Gas Imaging

Costs were obtained from OGI providers. One provider quoted costs to implement an OGI network to continuously monitor tanks. Like gas sensor networks, optical gas imaging networks are offered for purchase and as a service.

Costs for a basic fixed continuous monitoring system for purchase include one-time costs and periodic maintenance costs. The one-time cost for a basic fixed system with a cooled OGI camera is \$108,000 per camera and includes the camera, camera mounting in an ATEX rated enclosure and service costs. Additional options are available such as pan and tilt systems, explosion proof enclosures, and power and cellular connection for remote areas. A basic fixed system with cellular connection increases costs from \$108,000 to approximately \$118,000 per camera and a basic fixed system with trailer power system increases costs from \$108,000 to \$132,000 per camera. The cooling component is expected to need replacement every three to four years and costs \$15,000 to replace.

Hardware as a service requires a one-time down payment and monthly costs. The one-time cost is approximately \$11,000 per camera for a basic fixed system, \$12,000 for a fixed system with cellular connected, and \$20,000 for a basic fixed system with a trailer power system. The monthly fee is \$6,000 per camera for a basic fixed system, \$6,500 per camera for a basic fixed system with cellular connection, and \$7,500 per camera for a basic fixed system with a trailer power system. Seven fixed OGI devices on a pan and tilt system were assumed to be required to detect large leaks at the example tank farm. Figure 4.11 shows how an OGI network would be implemented at the example tank farm.

Figure 4.11 – Implementation of Fixed OGI Devices (Example)



Total annual costs to implement a network of seven fixed OGI cameras is estimated at \$85,700 if purchased, installed and operated by the facility, and \$706,900 if purchased as hardware as a service.

Weekly and Semi-Annual Monitoring – Optical Gas Imaging

PAR 1178 will require facilities to monitor storage tanks for leaks by conducting tank farm inspections with an OGI device on a weekly basis for all tanks as well as semi-annual component inspections for floating roof tanks. A total of 1,0591,093 tanks were identified as will be subject to PAR 1178, however, only tanks storing organic liquid with TVP greater than 0.1 psia will be subject to OGI inspections. Tanks identified as subject to OGI inspections are located at 3029 facilities. Costs for OGI inspections were obtained from two leak detection service providers that use OGI.

One service provider estimated service costs at approximately \$1,000 per day and that it may take one week to inspect a large tank farm with 100 tanks. Another service provider estimated costs to inspect three to four tanks from the platform as well as conduct an overview inspection of the entire tank farm to identify large leaks at approximately \$1,500 per technician per day. The provider explained that it is typical to use a two-person crew to perform an inspection for safety reasons. The total cost for an OGI inspection that includes monitoring from the tank platform for three to four tanks and monitoring of the entire tank farm for large leaks using a two-person crew is \$3,000.

Twenty-seven facilities were identified during the rule development when costs were being determined and were evaluated to determine costs for are subject to OGI inspections. The cost for each inspection is estimated at \$3,000 and would be conducted weekly. The total annual cost for weekly OGI inspections for 27 facilities is \$4,212,000.

Cost-Effectiveness

Cost-effectiveness was calculated for different monitoring methods. Table 4.4 shows the cost-effectiveness for each method.

Table 4.4 – Cost-Effectiveness for Monitoring Methods

Monitoring Method	Cost-Effectiveness (\$/ton of VOC reduced)
Continuous monitoring - Gas sensors	\$44,800/\$54,400 (as a service)
Continuous monitoring - Open path	\$30,700
Continuous monitoring - OGI	\$23,900/\$188,500 (as a service)
Weekly and semi-annual monitoring - OGI	\$25,400

SOCIOECONOMIC ANALYSIS

A socioeconomic impact assessment has been prepared and ~~has been~~will be released for public review and comment at least 30 days prior to the South Coast AQMD Governing Board public hearing, which is scheduled to be held on September 1, 2023.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) ANALYSIS

PAR 1178 is considered a “project” as defined by the California Environmental Quality Act (CEQA) and the South Coast AQMD is the designated lead agency. Pursuant to South Coast AQMD’s Certified Regulatory Program (Public Resources Code Section 21080.5 and CEQA Guidelines Section 15251(l); codified in South Coast AQMD Rule 110) and CEQA Guidelines Section 15070, the South Coast AQMD has prepared an Environmental Assessment (EA) with less than significant impacts for PAR 1178, which is a substitute CEQA document, prepared in lieu of a Negative Declaration pursuant to CEQA Guidelines Section 15252. The Draft EA did not identify any environmental topic areas that would be significantly adversely affected by physical modifications resulting from the proposed project. ~~A~~The Draft EA ~~washas been~~ released for a 30-day public comment and review period from July 19, 2023 to August 18, 2023 to provide public agencies and the public an opportunity to obtain, review, and comment on the environmental analysis. Comments were made relative to the analysis in the Draft EA and responses to the comments ~~are~~will be included in the Final EA.

DRAFT FINDINGS UNDER HEALTH AND SAFETY CODE SECTION 40727

Requirements to Make Findings

Health and Safety Code Section 40727 requires that prior to adopting, amending, or repealing a rule or regulation, the South Coast AQMD 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. In order to determine compliance with Health and Safety Code Section 40727, Health and Safety Code Section 40727.2 requires a written analysis comparing the proposed amended rule with existing regulations, if the rule meets certain requirements. The following provides the draft findings.

Necessity

A need exists to amend PAR 1178 to implement best available retrofit control technology and emission reduction strategies recommended in the WCWLB CERP as part of the AB 617 commitment.

Authority

The South Coast AQMD obtains its authority to adopt, amend, or repeal rules and regulations from Health and Safety Code Sections 39002, 40000, 40001, 40440, 40506, 40510, 40702, 40725 through 40728, 41508, 41700, and 42300 et seq.

Clarity

PAR 1178 is written or displayed so that its meaning can be easily understood by the persons directly affected by them.

Consistency

PAR 1178 is in harmony with and not in conflict with or contradictory to, existing statutes, court decisions or state or federal regulations.

Non-Duplication

PAR 1178 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 South Coast AQMD.

Reference

In amending these rules, the following statutes which the South Coast AQMD hereby implements, interprets or makes specific are referenced: AB 617, Health and Safety Code Sections 39002, 40001, 40406, 40506, 40702, 40440(a), 40725 through 40728.5, 40920.6, and 42300 et seq.

COMPARATIVE ANALYSIS

Health and Safety Code Section 40727.2 requires a comparative analysis of each proposed amended rule with any federal, or South Coast AQMD or other air district rules and regulations applicable to the same source. A comparative analysis is presented below in Table 4.5.

Table 4.5 – Comparative Analysis

Rule Element	PAR 1178	PAR 463	40 CFR 60	SJVAPCD
Applicability	<ul style="list-style-type: none"> Storage tanks at facilities emitting 20 tons per year (tpy) or more in any year since 2000 that: <ul style="list-style-type: none"> have capacity of 19,815 gallons or more and stores organic liquid with TVP >0.1 psia; or have PTE of 6 tpy or more <u>used in crude oil or natural gas production</u> 	<ul style="list-style-type: none"> Storage tanks from 19,815-39,630 gallons storing material with TVP of 1.5 psia or greater Storage tanks with capacity 39,630 gallons or more storing liquids with TVP of 0.5 psia or greater Storage tanks from 251 gal to 19,815 gal storing gasoline 	<ul style="list-style-type: none"> Storage constructed, reconstructed or modified after July 23, 1984 with capacity of 75 m³ or greater Tanks with capacity of 19,185-39,889 gallons with a vapor pressure between 4 psia and 11.1 psia and tanks with capacity greater than 39,889 gal with vapor pressure between 0.75 psia and 11.1 psia. 	<ul style="list-style-type: none"> Storage tanks with capacity 1,100 gallons and greater

		<ul style="list-style-type: none"> • Storage tank with PTE of 6 tpy or more located at petroleum facilities 		
Requirements	<ul style="list-style-type: none"> • Floating roofs or fixed roofs with 98% control • Seals and covers on all roof openings • Rim seal systems consisting of primary and secondary seals on all floating roof tanks • Gap requirements for primary and secondary seals • Doming for crude oil tanks 	<ul style="list-style-type: none"> • Floating roofs or fixed roofs with 95% control 	<ul style="list-style-type: none"> • Seals and covers on all roof openings • Rim seal systems consisting of primary and secondary seals on all floating roof tanks • Vapor recovery with minimum efficiency of 95% by volume on all fixed roof tanks with • Gap requirements for primary and secondary seals 	<ul style="list-style-type: none"> • Seals and covers on all roof openings • Rim seal systems consisting of primary and secondary seals on all floating roof tanks • Vapor recovery with minimum efficiency of 95% by volume on all fixed roof tanks • Gap requirements for primary and secondary seals
Reporting	<ul style="list-style-type: none"> • Submit reports for all semi-annual and quarterly inspections (non-OGI inspections) • Submit report for all leaks identified during any inspection 	<ul style="list-style-type: none"> • Submit reports for all semi-annual and quarterly inspections • Submit report for all leaks identified during any inspection 	<ul style="list-style-type: none"> • Inspection reports of floating roof tanks submitted within 30 days. • For fixed roofs vented to a flare or incinerator a report shall be submitted indicating any period of pilot flame out within 6 months of initial start-up and on a semi-annual basis thereafter • Records to be kept for a minimum of 2 years. 	<ul style="list-style-type: none"> • Submit inspection reports within 5 days of completion • Report prior to conducting voluntary tank inspection
Monitoring	<ul style="list-style-type: none"> • Periodic gap measurements for floating roof tanks • Periodic Method 21 measurements for fixed roof tanks • Weekly OGI monitoring for all tanks and additional semi-annual OGI inspections for floating roof tanks 	<ul style="list-style-type: none"> • Periodic gap measurements for floating roof tanks • Periodic Method 21 measurements for fixed roof tanks 	<ul style="list-style-type: none"> • Measurements of gaps between the tank wall and the primary seal (seal gaps) shall be performed during the hydrostatic testing of the vessel or within 60 days of the initial fill with VOL and at least once every 5 years thereafter. • Measurements of gaps between the tank wall and the secondary seal shall be performed within 60 days of the initial fill with VOL and at least once per year thereafter. 	<ul style="list-style-type: none"> • Annual gap measurements for external floating roof tanks • Gap measurements for internal floating roof tanks at least once every 60 months • Voluntary annual visual and U.S. EPA Method 21 inspections for all tanks
Recordkeeping	<ul style="list-style-type: none"> • Written records of inspections and findings • Digital recordings of all leaks identified during OGI inspections • All data required by this rule shall be maintained for at least five years and made 	<ul style="list-style-type: none"> • All data required by this rule shall be maintained for at least five years and made available for inspection by the Executive Officer 	<ul style="list-style-type: none"> • For fixed roof tanks vented to vapor recovery an operating plan shall be kept, indicating the parameter monitored. • Records to be kept for a minimum of 2 years. 	<ul style="list-style-type: none"> • Records of tank cleaning kept for 5 years

	available for inspection by the Executive Officer	• Written records of inspections and findings		
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INCREMENTAL COST-EFFECTIVENESS

Health and Safety Code section 40920.6 requires an incremental cost-effectiveness analysis for BARCT rules or emission reduction strategies when there is more than one control option which would achieve the emission reduction objective of the proposed amendments relative to ozone, carbon monoxide, sulfur oxides, oxides of nitrogen, and their precursors. Since volatile organic compounds are precursors to ozone, an incremental cost-effectiveness analysis is required for controls proposed to limit VOC emissions. Incremental cost-effectiveness is the difference in the dollar costs divided by the difference in the emission reduction potentials between each progressively more stringent potential control options as compared to the next less expensive control option.

Incremental cost-effectiveness is calculated as follows:

$$\text{Incremental cost-effectiveness} = (C_{\text{alt}} - C_{\text{proposed}}) / (E_{\text{alt}} - E_{\text{proposed}})$$

Where:

- C_{proposed} is the present worth value of the proposed control option;
- E_{proposed} are the emission reductions of the proposed control option;
- C_{alt} is the present worth value of the alternative control option; and
- E_{alt} are the emission reductions of the alternative control option

PAR 1178 would require facilities to meet more stringent control or monitoring requirements. The next progressively more stringent potential control option is different for each proposed requirement.

PAR 1178 will require facilities to dome any external floating roof tank storing organic liquid with a true vapor pressure of 3 psia or greater. The next progressively more stringent requirement would be to require all external floating roof tanks to be domed, regardless of the TVP of the organic liquid stored. A cost-effectiveness analysis for doming all external floating roof tanks including those storing material with TVP of 0.1 psia or less was conducted. The same assumptions were made as in the cost-effectiveness analysis for doming tanks with TVP of 3 psia and greater and TankESP PRO software was used to calculate emission reductions. Approximately 85% of EFRs storing material with TVP less than 3 psia are used to store heavy petroleum products such as diesel, jet fuel and kerosene. These products have a TVP of less than 0.1 psia. Because of the low TVP, far less emission reductions result ~~from~~ doming tanks storing such material. Staff analyzed EFRs for which emissions were reported in the 2019 Annual Emission Reports. The incremental cost-effectiveness to dome all tanks is:

$$\text{Incremental cost-effectiveness} = (\$127,200,000 - \$71,600,000) / (2,346 - 2,205) = \$394,000 \text{ per ton of VOC reduced}$$

The incremental cost analysis presented above demonstrates that the alternative control option is not viable when compared to the control strategy of the proposed amendments.

PAR 1178 will require secondary seals on all internal floating roof tanks storing material with TVP of greater than 0.1 psia. The next progressively more stringent requirement would be to require secondary seals on all internal floating roof tanks regardless of the TVP of material stored. A cost-effectiveness analysis for requiring secondary seals on all internal floating roof tanks including those used to store material with TVP of 0.1 psia and ~~less~~lower was conducted. Thirty-one additional internal floating roof tanks do not have secondary seals installed. The total cost to install secondary seals on 31 tanks is \$1,521,696. Costs to empty and degas a tank are not included in the estimate. The total VOC emission reduction is one ton per year. The cost-effectiveness is \$76,000 per ton of VOC reduced.

$$\text{Incremental cost-effectiveness} = (\$1,522,000 - \$428,800) / (20 - 19.4) = \$1,822,000 \text{ per ton of VOC reduced}$$

The incremental cost analysis presented above demonstrates that the alternative control option is not viable when compared to the control strategy of the proposed amendments.

PAR 1178 will require emission control systems to meet 98% by weight control efficiency. Emission control systems are required on fixed roof tanks storing organic liquid with TVP greater than 0.1 psia. The next progressively more stringent requirement is to require emission control systems with 98% by weight control efficiency on all fixed roof tanks regardless of the TVP of the material stored. A cost-effectiveness analysis for requiring emission controls systems with 98% by weight control efficiency on all fixed roof tanks, including those used to store material with TVP of 0.1 psia and ~~less~~lower was conducted. Staff analyzed the cost to require emission controls systems on tanks used to store material with TVP of 0.1 psia and lower~~less~~ at a refinery. Costs were obtained from a vapor recovery provider however, this provider explained that vapor recovery is not typically the best option for low flow systems. Capital costs range from approximately \$700,000 to \$2 million depending on the size of the system and install costs are approximately 70% of the capital costs. Costs for maintenance were not provided. Costs to modify existing tanks to be routed to a vapor recovery system were not considered. It is expected that costs to modify existing tanks is significant. Assuming only capital and install costs, the cost-effectiveness to require emission control systems with at least 98% by weight control efficiency is \$69,000 per ton of VOC reduced. It should be noted that actual feasibility of this technology on low flowrate systems may not be efficient and the actual costs to connect tanks to a vapor recovery system is expected to be significantly higher than the capital and install costs. Total costs to install vapor recovery on tanks storing material with TVP of 0.1 psia and less at the refinery is \$19,040,000. The total emission reductions are 276.4 tons over 25 years (assumed equipment life).

$$\text{Incremental cost-effectiveness} = (\$19,040,000 - \$0) / (276.4 - 0) = \$69,000 \text{ per ton of VOC reduced } \underline{\text{or higher}}$$

The incremental cost analysis presented above demonstrates that the alternative control option is not viable when compared to the control strategy of the proposed amendments.

PAR 1178 will require OGI inspections on a weekly basis. The next progressively more stringent requirement is to require OGI inspections daily. Cost-effectiveness for daily OGI inspections was

calculated. Based on the total annual cost for weekly OGI inspections for all facilities of \$3,016,000, the total annual cost for all facilities is \$6,032,000. Estimated reductions are 172 tons per year.

$$\text{Incremental cost-effectiveness} = (\$8,424,000 - \$4,212,000) / (172 - 166) = \$702,000 \text{ per ton of VOC reduced}$$

The incremental cost analysis presented above demonstrates that the alternative control option is not viable when compared to the control strategy of the proposed amendments.

Table 4.6 summarizes the proposed requirement, the next progressively more stringent requirements, and the incremental cost-effectiveness.

Table 4.6 – Summary of Incremental of Cost-Effectiveness Results

Proposed Requirement	More stringent potential requirement	Incremental cost-effectiveness (\$/ton)
Doming for TVP of ≥ 3 psia	Doming for all EFR tanks	\$394,000
Secondary seals for IFR tanks, TVP > 0.1 psia	Secondary seals for all IFR tanks	\$1,822,000
98% control efficiency for fixed roof tanks, TVP > 0.1 psia	98% control efficiency for all fixed roof tanks	Greater than \$69,000 <u>or higher</u>
Weekly OGI inspections	OGI inspections twice per week	\$702,000

APPENDIX A: RESPONSE TO PUBLIC COMMENTS

1. Western States Petroleum Association, Received March 1, 2023



Patty Senecal
Senior Director, Southern California Region

March 1, 2023

Via e-mail at: mmorris@aqmd.gov

Mike Morris
Manager, Planning and Rules
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Re: SCAQMD Proposed Amended Rule 1178, Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities – WSPA Comments on Cost-Effectiveness Analysis and Lack of Consideration of O&M Costs

Dear Mr. Morris,

Western States Petroleum Association (WSPA) appreciates the opportunity to participate in the Working Group Meetings (WGMs) for South Coast Air Quality Management District (SCAQMD or District) Proposed Amended Rule 1178, Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities (PAR 1178). WSPA is a non-profit trade association representing companies that explore for, produce, refine, transport, and market petroleum, petroleum products, natural gas, renewable fuels, and other energy supplies in five western states including California. WSPA has been an active participant in air quality planning issues for over 30 years. WSPA-member companies operate petroleum refineries and other facilities in the South Coast Air Basin that will be impacted by PAR 1178.

The California Health & Safety Code requires the District, in adopting any Best Available Retrofit Control Technology (BARCT) standard, to ensure the standard is technologically feasible, and take into account “environmental, energy, and economic impacts” and to assess the cost-effectiveness of the proposed control options.¹ Cost-effectiveness is defined as the cost, in dollars, of the control alternative, divided by the emission reduction benefits, in tons, of the control alternative.² If the cost per ton of emissions reduced is less than the established cost-effectiveness threshold, then the control method is considered to be cost-effective. Cost-effectiveness evaluations need to consider both capital costs (e.g., equipment procurement, shipping, engineering, construction, and installation) and operating (including expenditures associated with utilities, labor, and replacement) costs. Currently, the District is applying a cost-effectiveness threshold of \$36,000 per ton of VOC emissions reduced, consistent with the 2022 Air Quality Management Plan (2022 AQMP).³

¹ California Health & Safety Code §40406, 40440, 40920.6.

² California Health & Safety Code §40920.6.

³ SCAQMD Draft Final 2022 Air Quality Management Plan. Available at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>.

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SCAQMD released PAR 1178 Preliminary Draft Rule Language and Preliminary Draft Staff Report on February 17, 2023.^{4,5} WSPA offers the following comments on the information presented therein.

- 1. In estimating costs for doming of external floating roof crude oil tanks, the District has not included potential operation and maintenance (O&M) costs. This is not a complete view of costs and fails to align with the Discounted Cash Flow (DCF) method. O&M costs must be considered (along with capital costs) in the calculation of the present value of the proposed controls, and the cost-effectiveness of the proposed control must be reevaluated.**

SCAQMD's cost-effectiveness thresholds presented in the 2022 AQMP are based on the DCF method, in which the present value of control costs over the life of the equipment is calculated by incorporating capital costs, annual operation and maintenance (O&M) costs, and other periodic costs over the life of the equipment.⁶ For this rule, SCAQMD has stated that they are using the DCF method but have assumed that O&M costs would be \$0.⁷ Therefore, costs related to annual O&M and other periodic costs over the life of the equipment have not been included in SCAQMD's estimate of lifetime costs. Staff have provided no evidence to support this zero O&M cost assumption.

In its comment letter dated January 19, 2023, WSPA commented that SCAQMD needed to reevaluate exclusion of O&M costs. SCAQMD responded to this comment in the Preliminary Draft Staff Report, stating⁸:

"No costs have been provided by facilities for maintenance of a dome, nor have facilities made mention of maintenance requirements for a dome"

WSPA is hereby providing additional information on costs for O&M of tank domes over the 50-year proposed lifetime which show that the zero O&M cost assumption is unsupported.

The type of fixed roof most commonly used in domed external floating roof tanks is a self-supporting aluminum dome roof.⁹ These domes are crafted with triangular high strength aluminum alloy panels that are 0.050 inches thick to reduce the additional weight placed on the external floating roof storage tanks. This is generally necessary to minimize the need for additional structural retrofits of the tank.¹⁰ Although these aluminum alloys are found to be more corrosion resistant than other metals used in storage tank applications (e.g., steel), aluminum does

⁴Proposed Amended Rule 1178, Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities: Preliminary Draft Rule Language. Available at: <http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1178/par-1178-preliminary-draft-rule-language.pdf?sfvrsn=6>.

⁵ SCAQMD Proposed Amended Rule 1178 Preliminary Draft Staff Report. Available at: <http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1178/par-1178-preliminary-draft-staff-report.pdf?sfvrsn=6>.

⁶ SCAQMD Draft Final 2022 Air Quality Management Plan. Available at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>.

⁷ Personal communication between Yasmine Stutz, Ramboll, and Melissa Gamoning, SCAQMD on 11/9/22

⁸ SCAQMD PAR 1178 Preliminary Draft Staff Report. Available at: <http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1178/par-1178-preliminary-draft-staff-report.pdf?sfvrsn=6>.

⁹ Kolmetz Handbook of Process Equipment Design. Storage Tank Selection, Sizing, and Troubleshooting. 2012. Available at: <https://www.klmtechgroup.com/PDF/EDG-SYS/ENGINEERING-DESIGN-GUIDELINES-storage-tank-Rev2.1web.pdf>

¹⁰ Geodesic Aluminum Dome & Cover Roof Specification. Available at: https://www.tankconnection.com/assets/pdf/Aluminum_Dome_Specification_API_650_G.pdf

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experience pitting corrosion in marine environments, with aluminum plating near seashores showing pitting of up to 600 microns (0.0236 inches) after 20 years, nearly half the original thickness of the panels.¹¹ Further, thermal contractions and expansions can also generate gaps in the aluminum panels of domes. These gaps can be sealed with tape, covered by applying a dome coating system, or the panels can be replaced.¹² Pitting corrosion can be prevented or treated by applying a dome coating system, or the panels can be replaced.¹³ Most of the crude storage tanks subject to this regulation are located at facilities which are in the coastal environment. As such, preventative maintenance actions would be necessary to prevent corrosion and ensure the long-term functionality of these self-supporting aluminum domes over an extended period such as the 50-year useful life assumed in the Staff analysis.

The National Association of Corrosion Engineers (NACE) provides a methodology to estimate the costs of a dome coating system in their paper titled "Expected Service Life and Cost Considerations for Maintenance and New Construction Protective Coating Work".¹⁴ These costs are intended to represent total costs that include "hourly wages, supervision, equipment rates, overhead, profit, and other cost elements.". Project specific costs will vary depending on job size, geographic location, and other factors.

WSPA's technical consultant, Ramboll US Consulting (Ramboll), estimated the cost of corrosion coating based on the following assumptions and methodology:

- The aluminum geodesic dome has a ratio of dome height to tank diameter of 1:6.¹⁵
- A common coating system for this application consists of an inorganic zinc primer with an epoxy intermediate coat and a polyurethane topcoat, per a case study on crude oil tank coating selection.¹⁶ The cost of such a coating system is approximated as \$1.18 per square foot (2014 \$US) if applied via spraying or \$0.92 per square foot if applied via brush and rolls by combining the costs of an Inorganic Zinc Rich coat, Epoxy Intermediate/Topcoat, and Polyurethane Aliphatic Acrylic Intermediate/Topcoat.¹⁷
- The service life, or "practical life", of the system is estimated to be 15 years in coastal and offshore areas with high salinity.¹⁸
- Total lifecycle costs were approximated by considering the original painting and the spot touch-ups and repairs, maintenance repaints, and full repaints necessary to maintain the coating system. Spot touch-ups and repairs occur at the practical life of the system and are reported to cost 40% of the original paint.¹⁹
- The time until a maintenance repaint is estimated to be the practical life plus 33% and assumed to cost 70% of the original paint. A full repaint, which involves total coating

1-1

¹¹ Alcan Marine. Corrosion Behavior of Aluminum in Marine Environments. Available at: <https://almet-marine.com/wp-content/uploads/2021/07/Ch10-corrosion-behaviour-of-aluminium-in-marine-environments.pdf>.

¹² Basic Concepts Inc Justrite Safety Group. Geodesic Dome Repair. Available at: <https://www.basicconcepts.com/spray-coatings/above-ground-tank-geodesic-dome-roof-repair/>.

¹³ Ibid.

¹⁴ NACE, Expected Service Life and Cost Considerations for Maintenance and New Construction Protective Coating Work. 2014. Available at: <https://studylib.net/doc/25402068/expected-service-life-and-cost>

¹⁵ Maxwell Continental Tankserv. Alu Geodesic Dome Roofs. Available at: <https://maxwelltanks.com/domed-floating-roof-tank/alu-geodesic-dome-roofs/>.

¹⁶ T.H.J Revetement. Protective Coating of Crude Oil Storage Tanks. Available at: <https://thi-revetement.com/en/protective-coating-of-crude-oil-storage-tanks/>.

¹⁷ NACE, Expected Service Life and Cost Considerations for Maintenance and New Construction Protective Coating Work. 2014. Available at: <https://studylib.net/doc/25402068/expected-service-life-and-cost>

¹⁸ Ibid.

¹⁹ Ibid

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removal and replacement, is expected to occur at the year of the maintenance repaint plus 50% of the practical life, or 183% of the practical life, and cost 135% of the original paint.²⁰

Assuming a constant inflation rate over the 50-year lifetime of the coating system (+28% from 2014 to 2023),²¹ the costs associated with maintenance on one 180-ft diameter tank in 2023 dollars are estimated to be approximately \$345,500 if using brush/roll applications or \$444,000 if using spray applications.

SCAQMD provided data on tank diameters for 51 crude oil tanks subject to Rule 1178.²² Using the methodology defined above, Ramboll calculated the estimated cost to maintain the domes for these tanks over a 50-year period. This maintenance cost was estimated to be \$23 million using spray applications or \$18 million using brush and roll applications (2023 \$US). SCAQMD reported a total estimated capital cost to dome 54 tanks as \$79,891,000, and the total emission reductions over 50 years as 2,233 tons.²³

Adding the calculated maintenance costs to the capital costs presented by SCAQMD, the total capital plus O&M costs for doming of the 51 tanks would range from \$97.8 million to \$103 million. Inclusion of this reasonable estimate for O&M costs would yield a calculated cost-effectiveness of between \$43,808 and \$46,093 per ton of VOC reduced. This value exceeds the cost-effectiveness threshold of \$36,000 per ton of VOC reduced. We note that this estimate for O&M costs does not include additional labor costs caused by Senate Bill (SB) 54 requirements. California refineries are required to hire unionized labor which SCAQMD has previously estimated to add 20% to labor costs.²⁴ So adding SB54 consideration would further raise the estimated costs.

The above analysis clearly demonstrates that SCAQMD's zero O&M cost assumption is unreasonable. WSPA reiterates its comment that SCAQMD must reevaluate the cost assumptions presented for PAR1178 to include O&M costs and other periodic costs over the lifetime of the equipment. With that, the cost-effectiveness must be re-assessed for the proposed BARCT measure to require doming of external floating roof tanks storing crude oil.

1-1

²⁰ Ibid.

²¹ U.S. Bureau of Labor and Statistics. CPI Inflation Calculator. Available at: https://www.bls.gov/data/inflation_calculator.htm

²² Email transmittal from James McCreary, SCAQMD to Yasmine Stutz, Ramboll on November 9, 2022.

²³ SCAQMD Proposed Amended Rule 1178 Preliminary Draft Staff Report. Available at: <http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1178/par-1178-preliminary-draft-staff-report.pdf?sfvrsn=6>.

²⁴ SCAQMD Proposed Rule 1109.1 – Emissions of Oxides of Nitrogen from Petroleum Refineries and Related Operations, Draft Staff Report, October 2021. Available at: http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1109.1/dsr_pr_1109-1_30_day_package.pdf?sfvrsn=4.

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WSPA appreciates the opportunity to provide these comments related to PAR 1178. We look forward to continued discussion of this important rulemaking. If you have any questions, please contact me at (310) 808-2144 or via e-mail at psenecal@wspa.org.

Sincerely,



Cc: Wayne Nastri, SCAQMD
Sarah Rees, SCAQMD
Michael Krause, SCAQMD
Rodolfo Chacon, SCAQMD
Melissa Gamoning, SCAQMD
James McCreary, SCAQMD

Comment 1-1

Staff has revised the cost-effectiveness based on information provided by dome suppliers, dome maintenance service providers, and facilities to include O&M costs as requested. Staff met with three dome maintenance service providers, including the service provider referred to in the comment letter, that provided information about maintaining an aluminum dome and the associated costs. Dome maintenance service providers stated that typical maintenance they perform involves the preparing of the aluminum service followed by applying a sealant or tape to the hubcaps and seams or applying caulking to seal gaps on the dome. Costs were obtained from the dome maintenance service providers for tanks of different diameters. The cost-analysis assumes that maintenance would be required every 20 years (1.5 times throughout the 50-year life of the dome) as indicated by facilities dome maintenance service providers. The cost curve used to estimate O&M costs for tanks of different diameters is shown in Figure 4.6. The discounted cash flow method at 4% was applied to determine total O&M cost. The total cost for O&M for 54 tanks is \$6,193,440 over 50 years. Refer to the dome O&M discussion in Chapter 4.

2. Torrance Refining Company, Received March 14, 2023



Torrance Refining
Company LLC
3700 W. 190th Street
Torrance, CA 90504
www.pbfenergy.com

March 14, 2023

VIA E-MAIL: srees@aqmd.gov

Sarah Rees, Ph.D.
Deputy Executive Officer
Planning, Rule Development & Area Sources
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Re: Comments on South Coast Air Quality Management District Staff's 1178 Proposed Amended Rule Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities Rule Language Presented to the Public on Wednesday, March 1, 2023

Dear Dr. Rees;

Torrance Refining Company LLC ("TORC") appreciates the opportunity to participate in the South Coast Air Quality Management District's ("District") rulemaking related to Proposed Amended Rule 1178, Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities ("PAR 1178"). TORC supports bifurcating the rule to address the U.S. EPA's 2016 Control Techniques Guidelines ("2016 CTG") for the Oil and Natural Gas Industry first and then continuing to work on the remainder of the proposed amendments. However, as discussed below, TORC has significant concerns with the PAR 1178 revised rule language ("Revised March 2023 Language") and the Public Workshop presentation presented by District staff on March 1, 2023.

As we understand, separate comments are being submitted by the Western States Petroleum Association ("WSPA"), which TORC supports and incorporates by reference as well as any prior comments submitted by WSPA.

Applicability

In the Revised March 2023 Language, the District staff has proposed removing the minimum true vapor pressure ("TVP") applicability of storage tanks without providing adequate justification other than wanting to include these low emitting tanks into the Optical Gas Imaging ("OGI") camera inspections. Storage tanks with a TVP of less than 0.1 psia are not subject to the emission control requirements of Rule 1178 since there are minimal emissions due to the low TVP. The District staff has yet to perform a Best Available Retrofit Control Technology ("BARCT") cost-effectiveness assessment for including these additional tanks into the OGI inspection program. As such, the District should not remove this 0.1 psia TVP applicability from PAR 1178 as it will not result in any beneficial emission reductions and be cost-prohibitive.

2-1

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Definitions

In the Revised March 2023 Language, District staff has defined “Component Inspection” of Storage Tank roofs and individual components to include Roof Openings and Rim Seal Systems. However, in section (d)(1)(D) of the Revised March 2023 Language, Rim Seal Systems are not required to be free of visible vapors during a Component Inspection. Since they are not required to be inspected with an OGI camera, the District should remove Rim Seal Systems from the definition and state that it is not included in the definition.

2-2

Inspection and Monitoring Requirements

In the Revised March 2023 Language, Section (f)(4)(C) requires Tank Farm Inspections at least every seven (7) calendar days. In PAR 1178, District Staff proposes to include storage tanks formerly excluded from Rule 1178 (i.e., tanks storing organic liquids with TVPs less than 0.1 psia as previously noted). As previously mentioned, since these tanks have minimal emissions, they are not subject to any emission control requirements. Including these previously exempted tanks, would approximately double the number of tanks to be inspected weekly thereby substantially increasing the cost to the facility without any correlating benefit to reducing emissions.

2-3

In addition, Revised March 2023 Language Section (f)(4)(C) requires demonstration of compliance to be made within twenty-four (24) hours of identifying Visible Vapors. However, depending on the tank service, the operation, and certain safety considerations (i.e., stilling a tank and/or confined space entry), it may not be possible to get onto the tank roof to confirm an unplanned compliance determination within 24 hours. As a result, TORC recommends that PAR 1178 be revised to allow a facility at least three (3) calendar days to determine compliance.

2-4

Reporting and Recordkeeping Requirements

In the Revised March 2023 Language Section (h)(1)(A), District staff proposes that the facility contact the District via 1-800-CUT-SMOG within eight (8) hours of identifying a Storage Tank compliance issue. Under this section, the date of non-compliance must be fully documented and included in the report submitted within one hundred twenty (120) hours of the determination. Additionally, the repair period of seventy (72) hours begins when the non-compliant determination is made. TORC believes that this notification is unnecessary, puts additional burden on the facility, and is inconsistent with other District rules such as Rule 1173, which does not require the immediate verbal reporting of leaks. Accordingly, TORC requests that this notification requirement be removed from PAR 1178.

2-5

Exemptions

In the Revised March 2023 Language Section (j)(2), District staff proposes to exempt Storage Tanks with organic liquids less than 0.1 psia from the requirements of PAR 1178 with the added exception of OGI monitoring. However, as stated previously, the District has not provided any emissions justification or BARCT incremental cost analysis to justify the burden and expense of a facility having to conduct such OGI inspections. Therefore, TORC believes the OGI requirement

2-6

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should be removed from this exemption, and the PAR 1178 applicability be limited solely to tanks storing organic liquid greater than 0.1 psia TVP.

2-6

Further, to qualify for the Revised March 2023 Language Section (j)(2) exemption, a facility must semi-annually test the organic liquid in a tank to confirm that the TVP is less than 0.1 psia. However, the semi-annually test requirement conflicts with the District's draft PAR 1178 Staff Report, which requires the TVP testing be conducted at least annually. TORC supports the draft Staff Report annual test requirement as most of these types of organic materials such as Jet Fuel and Diesel have TVPs much less than 0.1 psia. The tanks are designated to store these fuels and cannot have other products comingled with them. Accordingly, the need to confirm the TVP more than once annually for rule applicability is unnecessary.

2-7

BARCT Cost-Effectiveness Analysis

In addition to the other cost-effectiveness concerns brought up by the WSPA during the PAR 1178 rulemaking, TORC has additional concerns regarding the District staff's BARCT cost-effectiveness analyses, or lack thereof. In establishing BARCT, as previously performed for Rule 1109.1, and as required under California law, the District must do all of the following:

1. Identify one or more potential control options which achieves the emission reduction objectives for the regulation.
2. Review the information developed to assess the cost-effectiveness of the potential control option.
3. Calculate the incremental cost-effectiveness for the potential control options. This means that the District shall 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.
4. Consider the effectiveness of the proposed control option, the cost-effectiveness of each potential control option, and the incremental cost-effectiveness between the potential control options.

2-8

On March 1, 2023, the District staff presented a summary of its cost-effectiveness and incremental cost-effectiveness analyses in the Revised March 2023 Language and Public Workshop Slide 27. In Slide 27, the District staff further provided a summary of the cost-effectiveness for each control option. However, there is not a cost-effectiveness analysis for "more stringent gap requirements" or "98% Emission Control for fixed roof tanks" options. The District staff's draft Staff Report also fails to present a cost-effectiveness analysis for these control options. Under California law, and consistent with prior adopted rules, the District must include these analyses in its BARCT assessment. Moreover, when the 98% control for fixed roof tanks option is already being met, the District should not be able to take credit for the emission reductions on Slide 26.

2-9

Additionally, Slide 26 lists the proposed BARCT controls in order of reductions obtained. However, the incremental cost-effectiveness analyses only consisted of evaluating the proposed control for a specific type of tank (e.g., 98% emission control for fixed roof with TVP > 0.1 psia)

2-10

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and then incrementally applied it to all fixed roof tanks. The cost-effectiveness analysis should have been done for each of the control options. The District must determine the incremental cost-effectiveness for each progressively more stringent control option, whereas incremental cost analysis should not be done for control options outside of the rule objectives, meaning that the rule is to establish controls on tanks storing organic liquids greater than 0.1 psia. Presenting incremental controls outside of that objective (i.e., tanks with organic liquids less than 0.1 psia TVP), except for OGI monitoring, is inappropriate for the PAR 1178 rulemaking and does not achieve any emission reductions.

2-10

The District staff's Draft Staff report stated that the reduced emissions using an OGI camera was based solely on a fixed roof tank storing crude oil with a malfunctioning pressure vacuum vent. As the District staff are aware, there are other types of tanks and materials stored where the emissions from a leak would be much less. However, since the emissions reduced as shown in the draft Staff Report and Slide 26 are only based on a fixed roof tank, OGI inspections may not be cost-effective for other tanks since the emissions reduced could have zero tons reduced. Therefore, before adopting PAR 1178, the District must determine the cost-effectiveness of requiring each type of tank to have an OGI inspection.

2-11

As part of PAR 1178, the District staff proposes to include all tanks at the facility regardless of the organic liquid vapor pressure and without. However, to determine the realistic cost of PAR 1178, the District staff's cost effectiveness analyses should have more categories of OGI inspections with increasingly higher reductions such as:

2-12

1. All tanks less than 0.1 psia TVP;
2. Internal floating roof tanks greater than 0.1 psia TVP;
3. Domed external floating roof tanks greater than 0.1 psia TVP;
4. External floating roof tanks greater than 0.1 psia TVP; and
5. Fixed roof tanks greater than 0.1 psia TVP.

Based on Slides 26 and 27, and as discussed above, the District is obligated to perform the BARCT incremental cost-effective analysis in order of least stringent to most stringent provided that the individual control option is cost effective. Accordingly, the PAR 1178 control options in the District staff's BARCT incremental cost-effective analysis should be ordered as shown below:

2-13

1. Weekly OGI inspections for all tanks less than 0.1 psia TVP;
2. Weekly OGI inspections for Internal floating roof tanks greater than 0.1 psia TVP;
3. Weekly OGI inspections for Domed external floating roof tanks greater than 0.1 psia TVP;
4. Weekly OGI inspections for External floating roof tanks greater than 0.1 psia TVP;
5. More Stringent gap requirements;
6. Secondary Seals for internal floating roof tanks greater than 0.1 psia TVP;
7. Doming for tanks storing material greater than 3 psia TVP; and
8. Weekly OGI inspections for Fixed roof tanks greater than 0.1 psia TVP.

* * *

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In closing, TORC believes that there are still too many issues and concerns regarding the Revised March 2023 Language and urges the District to meet with industry to work through these issues before any new revisions are made to PAR 1178. As described above, TORC has significant concerns related to the cost and application of the proposed OGI monitoring and certain reporting and notification requirements currently proposed in PAR 1178. TORC appreciates that the District staff is considering bifurcating the PAR 1178 rulemaking process so that all the critical issues discussed above can be addressed in a thoughtful, dispassionate, and informed manner.

2-14

Thank you for the opportunity to submit comments on the March 2023 Revised Language and Public Workshop presentation presented by District staff on March 1, 2023 as part of the PAR 1178 rulemaking. TORC stands ready to work diligently with District staff and other stakeholders to address the complex issues associated with PAR 1178.

Please note that in submitting this letter, TORC reserves the right to supplement its comments as it deems necessary, especially if additional or different information is made available to the public regarding the PAR 1178 rulemaking process.

If you have any questions regarding TORC's comments, please call or email me or John Sakers. Our office phone numbers are 310-212-4500 (Sara) and (310) 212-4292 (John).

Sincerely,



Sara Wilson
Refinery Manager

cc: **District Staff - via e-mail and overnight delivery**

Wayne Nastri	Executive Officer
Michael Krause	Assistant Deputy Executive Officer
Michael Moore	Planning and Rules Manager

cc: **District Refinery Committee Members - via e-mail and overnight delivery**

Hon. Larry McCallon	Governing Board Member and Refinery Committee Chair
Hon. Vanessa Delgado	Governing Board Chair
Hon. Michael A. Cacciotti	Governing Board Vice-Chair
Hon. Andrew Do	Governing Board Member
Hon. Veronica Padilla-Campos	Governing Board Member

Comment 2-1

Paragraph (j)(4) has been revised to exempt tanks storing material with a true vapor pressure of 0.1 psia and less from all requirements provided that the facility demonstrates the true vapor pressure of the material stored is 0.1 psia periodically. The testing frequency requirements will depend on the material stored. PAR 1178 will retain the proposed applicability to subject tanks storing material with a true vapor pressure of 0.1 psia or less to require periodic testing of TVP to verify qualification for exemption from rule requirements.

Comment 2-2

Subparagraph (d)(1)(D) has been revised to require that tanks remain free of visible vapors resulting from a defect. Staff's intent is to require an inspection of the rim seal system during a component inspection. The component inspection has been revised to allow for a determination of when demonstration of compliance with gap requirements is required. That determination is based on the detection of visible vapors emitted from the rim seal system. Requirements for the inspection is contained in paragraph (f)(4).

Comment 2-3

See response to Comment 2-1.

Comment 2-4

PAR 1178 has been revised to allow 3 days to determine compliance with the applicable rule requirement or make the necessary repairs when visible vapors are detected from component required to be vapor tight or in a condition with no visible gaps and when defects are observed.

Comment 2-5

Paragraph (h)(2) has been revised to require reporting within 24 hours of visible vapors detected during tank farm inspections emitted from a component required to be maintained in a vapor tight condition or in a condition with no visible gaps, or visible vapors detected that are resulting from defective equipment. South Coast AQMD staff finds it beneficial to inform South Coast AQMD Compliance staff when visible vapors are detected during a tank farm inspection given the likelihood that emissions are significant and indicative of a leak.

Comment 2-6

See response to Comment 2-1.

Comment 2-7

Paragraph (j)(4) has been revised to require TVP testing for refined products that meet consistent specifications for sale every 5 years. All other organic liquids are required to be tested on an annual basis.

Comment 2-8

Cost-effectiveness and incremental cost-effectiveness for control requirements have been conducted in accordance with the requirements of the Health and Safety Code. Cost-effectiveness evaluates the costs to comply with a proposed control requirement. For more stringent gap requirements and requiring emission control systems that achieve at least 98% control efficiency, by weight, staff determined that the proposed requirements are currently met. Thus, no additional

costs to meet the proposed control requirement is considered. When the cost to meet a proposed control requirement is zero, a cost-effectiveness calculation (where the cost to meet a proposed requirement is divided by the tons of pollutant reduced), is not conducted because it is understood that the resulting cost-effectiveness would be zero.

Comment 2-9

Emission reductions are calculated in two ways depending on the purpose. For cost-effectiveness, staff calculates emission reductions based on actual emissions. In the case of more stringent gap requirements and increased emission control system efficiency, the BARCT assessment results determined that the proposed requirements are currently met and the resulting emission reductions are zero, assuming that the equipment continually operates at the achievable level. For the cost-effectiveness calculation, staff assumes no emission reductions.

Emission reductions are also calculated and submitted to the State Implementation Plan. These emission reductions are based on the change to rule requirements. For example, if the rule currently requires 95 percent emission control efficiency and the proposed requirement is 98 percent control efficiency, staff calculates emission reductions associated increased control efficiency. When Rule 1178 was adopted, emission reductions were claimed for the implementation of emission control systems based on 95 percent emission control. Since staff is now proposing greater emission control efficiency and will submit the additional reductions to the State Implementation Plan. The resulting emission reductions are 0.01 tpd for requiring more stringent gap requirements and 0.07 tpd for requiring emission control efficiency of 98 percent by weight for fixed roof tanks.

Comment 2-10

Incremental cost-effectiveness was conducted in accordance with the Health and Safety Code. It is not unreasonable to consider requiring controls to additional tanks as a more stringent control option. Additionally, requiring controls to storage tanks storing material with TVP of 0.1 psia or less is not outside of the scope of the rule development and was analyzed as a measure to achieve additional emissions reductions from the type of equipment the rule applies to. It is incorrect to state that requiring controls for tanks storing organic material with TVP of 0.1 psia and less does not achieve emission reductions. The incremental cost-effectiveness shows that emission reductions would be achieved, however, it is not cost-effective to require an emission control system with 98 percent control efficiency to tanks storing material with a TVP of 0.1 psia or less.

Comment 2-11

The Preliminary Draft Staff Reports explains that baseline emissions were estimated using emission factors contained in U.S. EPA's 2016 CTG for uncontrolled tanks. Since the emission factors were likely based on emissions from tank batteries at oil production sites that are typically fixed roof tanks, staff used the average throughput of fixed roof tanks storing crude oil to estimate the associated emissions. Staff also compared U.S. EPA's estimates to results from measurements from a fixed roof tank with a malfunctioning pressure-vacuum vents. The comparison showed that using estimates for uncontrolled tanks can provide an estimate for a tank with malfunctioning controls resulting in a large leak. Staff determined that any tank with malfunctioning controls would emit in similar way to an uncontrolled tank and that U.S. EPA's estimates for uncontrolled tanks can characterize emissions from a large leak.

It is unreasonable to conclude that only fixed roof tanks can leak when all tank types are equipped with controls that can potentially fail. Staff is aware of significant leaks that have occurred from floating roof tanks, including a roof collapse, missing seals, and OGI footage of large emissions from floating roof tanks. Staff has concluded that any type of tank equipped with controls to reduce emission is capable of a large leak due to controls malfunction and it is appropriate to require OGI for all tanks, as well as analyze the cost-effectiveness for all tanks subject to OGI requirements without differentiating tank type.

Comment 2-12

PAR 1178 has been revised to exempt tanks storing organic liquid with TVP of 0.1 psia and less from OGI inspections at this time since they are not subject to controls. Staff has determined that a large leak can occur from any tank type and it is appropriate to analyze the cost-effectiveness for all tanks subject to OGI requirements without differentiating tank type (see response to Comment 2-11).

Comment 2-13



PAR 1178 has been revised to exempt tanks storing organic liquid with TVP of 0.1 psia and less from OGI inspections at this time since they are not subject to controls. Additionally, staff has determined that a large leak can occur from any tank type and it is appropriate to analyze the cost-effectiveness for all tanks subject to OGI requirements without differentiating tank type. An incremental cost-effectiveness for remaining categories was conducted and is shown in the table below. The total cost-effectiveness of PAR 1178 is \$27,800.

Control Option	Annual Cost (\$)	Annual Reductions (tons)	Incremental Cost-effectiveness (\$/ton)
Gap requirements	\$0	0	--
Gap requirements + Increased emission control (98%)	\$0	0	0
Gap requirements + Secondary seals	\$0 + \$21,455 = \$21,455	0 + 0.94 = 0.94	\$21,455/0.94 = \$22,800
Gap requirements + Secondary seals + Doming	\$0 + \$21,455 + \$1,659,561 = \$1,681,016	0 + 0.94 + 45.17 = 46.11	\$1,681,016/46.11 = \$36,800
Gap requirements + Secondary seals + Doming + Weekly OGI inspections	\$0 + \$21,455 + \$1,659,561 + \$4,212,000 = \$5,893,016	0 + 0.94 + 45.17 + 166 = 212.11	\$5,893,016/212.1 = \$27,800

Comment 2-14

Amendments to 1178 were bifurcated as requested to allow addition time to resolve outstanding issues.

3. Comment Letter from ~~the~~ Earth Justice, et. al., Received March 15, 2023



March 15, 2023

VIA EMAIL ONLY

Michael Morris, Planning and Rules Manager
South Coast AQMD
mmorris@aqmd.gov

RE: Comments on Preliminary Draft Language for Proposed Amended Rule 1178 (Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities)

Dear Mr. Morris:

The undersigned organizations submit these additional comments on the preliminary draft of Proposed Amended Rule (PAR) 1178. We appreciate the opportunity to provide additional input. Before enumerating several deficiencies with PAR 1178 that must be addressed, we would like to note several general concerns about South Coast AQMD’s approach in this rulemaking process that are undermining public participation and refinery accountability.

First, we must highlight that all our comments have been hampered by not having any available emissions data during rulemaking—neither total emissions for storage tanks, nor emissions for each category of tanks, nor for individual tanks. It seems unprecedented not to include even *total* emissions. The staff reports and presentations only provide *expected reductions*, but not *existing emissions*. This makes it impossible to determine the relative importance and effectiveness of control measures. Further, without this information, we cannot determine whether the proposal meets minimum requirements of the AB 617 Community Emission

3-1

Reduction Plan (CERP), which committed to at least 50% cuts in VOCs by 2030 or higher if feasible.¹

3-1

South Coast AQMD staff has informed us that they expect to provide some form of this data in two weeks, which is almost at the point of rule adoption. **Consequently, we may need to propose an unfortunate delay in adoption. This information can certainly affect our recommendations and decisions about whether we support or oppose adoption of PAR 1178.**

3-2

Second, there are already many tradeoffs and exemptions that we do not support.

One major problem is allowing exemptions from doming external floating roof tanks, and instead allowing occasional vapor pressure measurements that would be kept in-house at the polluting facilities. But adding a permanent roof is far superior to bi-annual parameter measurements that only measure a snapshot of vapor pressure, which can fluctuate widely over shorter periods of time. Many of the tradeoffs are driven by too low cost-effectiveness limits and are further skewed by known underestimation of emissions in the inventory. Large emissions of VOCs, including benzene and other harmful toxics, make strict application of Best Available Control Technologies (BACT) and Best Available Retrofit Control Technologies (BARCT) essential, but without the data we have requested, it is very hard for us to determine to what extent this will be applied, and what percent of reductions will be achieved.

3-3

Third, we urge you to reconsider our recommendation to implement a moratorium on new storage tanks subject to PAR 1178, or, at a minimum, explain to the public and Governing Board how PAR 1178 does not conflict with the 2022 Air Quality Management Plan (AQMP) and the California Air Resources Board (CARB) 2022 Scoping Plan. Specifically, the AQMP relies on electrification and the deployment of zero-emissions technology to achieve air quality standards in the

3-4

¹ South Coast AQMD, Governing Board Meeting Agenda No. 25C (Sept. 6, 2019) at 4, <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2019/2019-sep6-025c.pdf?sfvrsn=6> [archived at <https://perma.cc/Z3C8-KYLK>].

region.² That, in turn, requires a pause of the continued expansion of fossil fuel infrastructure that would undermine reductions secured through the deployment of these technologies. Similarly, the 2022 Scoping Plan to reduce GHG emissions outlines the need to significantly reduce demand for liquid petroleum and fossil fuel use by 2045.³ In updating regulations, such as PAR 1178, the South Coast AQMD should consider these air quality and climate objectives and identify opportunities to further—and not undermine—those commitments.

3-4

Finally, we urge you to reconsider our recommendation to conduct regular Fluxsense-type studies as part of the regulation. The 2015 Fluxsense study⁴ (published 2017) is the *only* monitoring that uncovered the drastic underestimation of VOCs and BTEX emissions at every single petroleum refinery. This type of study, conducted regularly, will be necessary to confirm whether PAR 1178 amendments have been successfully reducing VOC emissions. The South Coast AQMD expected its earlier updates to Rule 1178 to be much more restrictive of emissions than they

3-5

² South Coast AQMD, 2022 Air Quality Management Plan (Dec. 2022) at 4-7, <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16> [archived at <https://perma.cc/2XEK-AQS9>].

³ CARB, 2022 Scoping Plan for Achieving Carbon Neutrality at 2 (Nov. 2022), <https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf> [archived at <https://perma.cc/7M4A-8CAM>].

⁴ See generally Johan Mellqvist et al., 2015 *Emission Measurements of VOCs, NO₂ and SO₂ from the Refineries in the South Coast Air Basin Using Solar Occultation Flux and Other Optical Remote Sensing Methods* (Final Report, Apr. 2017), [http://www.aqmd.gov/docs/default-source/fenceline_monitoring/project_1/fluxsense_scaqmd2015_project1_finalreport\(040717\).pdf](http://www.aqmd.gov/docs/default-source/fenceline_monitoring/project_1/fluxsense_scaqmd2015_project1_finalreport(040717).pdf) [archived at <https://perma.cc/HV28-7CBB>]; CBE Decoder Factsheet (Apr. 2017), <https://www.cbecal.org/wp-content/uploads/2017/05/CBE-Decoder-Socal-Refinery-Study-Emissions-Underreported.pdf> [archived at <https://perma.cc/694N-6MU7>]. The Fluxsense study found drastically under-estimated VOC and benzene emissions for Los Angeles area refineries, likely due to storage tanks. It found normal calculations do not include degradation over time. This is likely true nationally, as indicated by a Fluxsense study in Texas that that found similar results. John K. E. Johansson et al., *Emission measurements of alkenes, alkanes, SO₂, and NO₂ from stationary sources in Southeast Texas over a 5 year period using SOF and mobile DOAS*, 119 *Journal of Geophysical Research: Atmospheres* 1973, 1983 (Feb. 2014), <https://doi.org/10.1002/2013JD020485> (attached as Ex. 1).

turned out to be. We want to ensure this will not happen again. If the South Coast AQMD cannot include this monitoring every three years, at least require it every five years to confirm the regulation is achieving the intended emission reductions.

3-5

As detailed below, we have identified several deficiencies with PAR 1178 that must be addressed before finalizing this amended rule for adoption:

- **South Coast AQMD must require the preparation of doming plans and a verification process to assess compliance with storage tank doming timelines and to confirm whether a petroleum facility intends to obtain a permit modification to exempt certain storage tanks.** PAR 1178 establishes a compliance schedule for all doming external floating roof tanks on a lengthy schedule—by December 31, 2038.⁵ Without the development of a plan and verification process, the public is left to speculate on petroleum facilities’ progress towards meeting doming requirements. Moreover, the public is uninformed as to whether a facility claims an exemption to limit “organic liquids stored in the tanks to lower than 3 psia” to avoid doming requirements.⁶ Without these requirements, oversight will be difficult for both the public and regulators. Given the number of petroleum facilities and storage tanks that would be subject to these doming requirements, plans should be developed that note which external floating roof tanks would be domed and which would be exempt through permit modifications, along with the proposed timeline for making those changes. Furthermore, emission reductions may not be achieved as expeditiously as feasible, and in compliance with AB 617’s WCWLB CERP toward 50% or more reductions of VOC emissions by 2030.

3-6

⁵ PAR 1178(d)(5), <http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1178/par-1178-preliminary-draft-rule-language.pdf?sfvrsn=6> [archived at <https://perma.cc/UK66-NN33>].

⁶ PAR 1178 (j)(5).

- **South Coast AQMD must require that Optical Gas Imaging (OGI) measurements of leaks be made publicly available by mandating that petroleum facilities submit those recordings to the Executive Officer as part of leak reporting requirements.** Under PAR 1178, petroleum facilities are required to record visible vapors from tanks “for a minimum of 5 seconds” that must be “accurately time-stamped and *kept on-site*” as part of inspections conducted using OGI.⁷ Petroleum facilities are required to maintain these recordings “for a minimum of 2 years” and to make them “available to the Executive Officer upon request,” which would undermine public access to this information.⁸ Since the agency would not have custody of this information, the public would be unable to obtain these recordings through a Public Records Act request. At a minimum, petroleum facilities should be required to submit these recordings to the agency as part of their non-compliance reporting. Under PAR 1178, facilities are not required to submit OGI recordings when reporting a violation of leak requirements identified by an inspection.⁹

3-7

- **South Coast AQMD must establish control and monitoring measures during undefined maintenance and repair periods under subdivision (g), rather than allow petroleum facilities to pollute with impunity during these periods.** PAR 1178 waives the “Vapor Tight Condition” requirement during “preventative maintenance or repair specified in subdivision (g) of this rule.”¹⁰ “Vapor Tight Condition” is defined as “a condition that exists when the reading on a portable hydrocarbon analyzer is less than 500 parts per million (ppm), expressed as methane, above background, measured using EPA Reference Method 21.”¹¹ In effect, under PAR 1178, petroleum facilities would receive an exemption from applicable emission limits and could

3-8

⁷ PAR 1178(f)(4), (h)(2)(D).

⁸ PAR 1178 (h)(3)(D).

⁹ PAR 1178(f).

¹⁰ PAR 1178(d)(1)(B).

¹¹ PAR 1178(c)(45).

potentially assert an affirmative defense for releasing excess VOC emissions during maintenance and repairs. Moreover, PAR 1178 does not define what constitutes a preventative maintenance or repair, which would inevitably make enforcement difficult and allow petroleum facilities to exploit this loophole by claiming certain significant VOC releases are due to maintenance or repair activities.

3-8

- There are many problems with the vapor pressure limits and exemptions under PAR 1178. Some of these issues can be improved but are inherently less permanent and reliable than requiring BACT equipment to be installed.
 - **Recording of vapor pressure determinations are insufficient. The South Coast AQMD must mandate that petroleum facilities record True Vapor Pressure (TVP) determinations at storage tanks, which facilities are currently not required to log and disclose under the updated Rule 1178 Compliance Reports.** Throughout PAR 1178, petroleum facilities are required to make determinations of “True Vapor Pressure”, defined as “vapor pressure of a liquid at actual storage conditions.”¹² Under PAR 1178 test methods and procedures, TVP of organic liquids would be determined using ASTM Method D-323 for Reid Vapor Pressure (RVP) and converted to TVP.¹³ Petroleum facilities, however, are not required to log these TVP correlations. Instead, the revised Rule 1178 Compliance Report requires only that facilities record product RVP, leaving the public to speculate as to the TVP.¹⁴ Importantly, recording TVP determinations is not only key in evaluating compliance with Rule 1178, but also with Title V permit conditions that generally specify TVP requirements for storage tanks rather than RVP. Consequently, as written, PAR 1178 would make it difficult to ensure compliance with applicable requirements and undermine enforcement efforts.

3-9

¹² PAR 1178(c)(43).

¹³ PAR 1178(i).

¹⁴ PAR 1178, Attachment A.

○ **TVP correlations themselves can lead to inaccuracies, making them unsuitable alternatives to more stringent BACT technology installations like permanent doming of tanks.** Requirements in the rule for RVP testing (easier to perform) followed by correlation with TVP nomographs (since TVP is hard to test) can lead to inaccuracies, even when TVP determinations are properly logged. For example, **one oil industry article found that TVP determinations could be 50 to 300% off from actual TVP due to errors that can occur using standard methods that estimate TVP by correlating it with measured RVP.**¹⁵ The South Coast AQMD has not demonstrated that it has set conditions equivalent to doming in its draft regulation. Standardized EPA tests are useful for many reasons, but in this case, not to exempt external floating roof tanks based on inherently less accurate measurements. Tank doming should be a high priority for the South Coast AQMD, as an inherently more reliable means to permanently cut emissions and protect public health. Indeed, **it is also required under AB 617's mandates to install BARCT at refineries.**¹⁶

3-10

○ **The frequency of testing is also insufficient to ensure that high-turnover tanks meet the TVP requirement for exemption from doming.** Biannual testing to avoid a requirement to dome a tank through a permit limit of 3 psia TVP is not sufficient to ensure the tank contents stay under this limit throughout the year. For example, crude oil tanks can turn over more than 50 times a year.¹⁷ The South Coast AQMD must demonstrate that RVP and TVP have no potential for changing more frequently, when

3-11

¹⁵ J.K. Henderson, *Test Method for "Actual" True Vapor Pressure of Crude Oils*, *SPE Advance Technology Series* 4 (Aug. 1996), <https://doi.org/10.2118/29740-PA> [archived at <https://perma.cc/9NTK-PP3L>].

¹⁶ See Cal. Health & Safety Code, § 40920.6(c).

¹⁷ See Final Environmental Impact Report for Tesoro Los Angeles Refinery: Appendix B (SCH No. 2014091020) at B-3-139 (May 2017), <http://www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2017/tesorolaric/appb.pdf?sfvrsn=2> [archived at <https://perma.cc/ZHU5-GD6H>]. For TANKS modeling inputs for six new crude oil tanks at 500,000 bbls each (21,000,000 gallons), Annual Turnovers are listed as 51.1. Tank turnovers can go higher.

refineries receive varying crude oil deliveries into their tanks. South Coast refineries receive crude from many nations with varying characteristics. While refineries likely tend to isolate heaviest crudes from lighter crudes in different tanks, individual tanks could still vary sufficiently to meet the exemption limit twice a year, while failing the rest of the year, hiding substantial emissions.

3-11

We appreciate South Coast AQMD staff's consideration of these concerns. We hope the agency will make necessary revisions to address these issues to ensure compliance with PAR 1178 requirements.

Sincerely,

/s/ Oscar Espino-Padron
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Michael Krause, Assistant Deputy Executive Officer
mkrause@aqmd.gov

Comment 3-1

Staff has included baseline emission for categories of tanks subject to proposed controls. Additional emissions information beyond the scope of this [proposed amended rule can be](#) available through a public records request.

Comment 3-2

Staff has provided emissions information used for the PAR 1178 rule development. The rule development was bifurcated to allow additional time for stakeholders to work with staff on proposed requirements.

Comment 3-3

Staff is proposing an option for facilities to limit the TVP of crude oil stored that will result in approximately the same emission reductions that would result from doming. Facilities would be prohibited from storing crude oil TVP greater than 3 psia which is verified on a semi-annual basis.

The cost-effectiveness threshold used has been established in the 2022 Air Quality Management Plan and was approved by the South Coast AQMD Governing Board. Emissions were estimated using the most currently methods and calculations for determining emissions from tanks.

Comment 3-4

PAR 1178 partially implements FUG-01 of the 2022 AQMP that commits to improved leak detection requirements in South Coast AQMD rules. Electrification is not applicable to storage tank operations and the 2022 AQMP does not include any measures to establish a moratorium on new storage tanks. The scope of amendments to PAR 1178 include reducing emissions with implementation of BARCT technologies.

Comment 3-5

Mobile monitoring informed the WCWLB community about potential leaks. Staff determined that OGI monitoring on a weekly basis would be far more effective to identify leaks more quickly and precisely. While staff agrees that monitoring studies can provide useful data about emissions from the monitored sources, staff does not agree that a requirement for periodic emissions studies will further reduce emissions from storage tanks as PAR 1178 is designed to do.

Comment 3-6

Paragraph (j)(5) was revised to require facilities with tanks subject to the doming requirements and doming schedule of subparagraph (d)(5)(B) to submit a permit application to limit the TVP of the crude oil stored to less than 3 psia within one year from date of adoption. Any tanks for which permit applications were not submitted for within one year from date of adoption are subject to the doming schedule of subparagraph (d)(5)(B).

Comment 3-7

Rule 1178 currently requires a written report be submitted to South Coast AQMD for all tanks found in non-compliance during an inspection. PAR 1178 extends this requirement for OGI inspection. It is sufficient for South Coast AQMD to obtain the written report and staff does not find a benefit in requiring facilities to submit the recording of the leak. Recordings are required to

inform compliance staff of when a leak was identified to determine a facility's compliance with repair timelines.

Comment 3-8

PAR 1178 does not affect current requirements for maintenance and repair. These requirements have been in effect since the rule's adoption in 2001 and are in place to allow facilities to make necessary repairs when a tank is found in non-compliance with rule requirements. Facilities have 72 hours to make any necessary repairs to bring a tank back into compliance. Staff does not propose to change these existing requirements that encourage facilities to identify leaks, make repairs to, and maintain equipment to effectively operate. If an unreported leak is found by South Coast AQMD compliance staff, staff may take enforcement action immediately.

Comment 3-9

PAR 1178 requires facilities to maintain and keep sampling results of TVP tests on site for 5 years.

Comment 3-10

PAR 1178 requires determination of TVP using current industry standards. Additionally, staff calculated emission reductions associated with doming and emission reductions associated with limiting TVP with the same emission calculating software (TankESP PRO) that provides the same methodology in estimation of emission reductions for both control options.

The Health and Safety Code Section 40920.6(c) requires implementation of BARCT which is defined as "an emission limitation that is based on the maximum degree of reduction achievable, taking into account environmental, energy, and economic impacts by each class or category of source." Staff determined that limiting the TVP of crude oil stored, as well as doming, align with the definition of BARCT since both control options provide approximately the same emission reductions.

Comment 3-11

PAR 1178 requires semi-annual testing of TVP for crude oil tanks that are not domed. Staff agrees that TVP of crude oil stored can vary between testing periods and will rely on compliance staff's ability to conduct random TVP testing in between testing conducted by the facility to prevent potential circumvention of the TVP allowance. In addition, tank operators may conduct TVP testing with greater frequency than required and those test records would be utilized to determine compliance.

4. Kinder Morgan, Received March 15, 2023



Via Email at: mgamoning@aqmd.gov

March 15, 2023
Melissa Gamoning
Air Quality Specialist
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

RE: Comments on February 17, 2023 Preliminary Draft Rule Language for Proposed Amended Rule 1178, Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities

Dear Ms. Gamoning:

Kinder Morgan (KM) appreciates the opportunities to participate in the Work Group Meetings and converse with South Coast Air Quality Management District (SCAQMD) Rule Writing Staff (Staff) regarding Proposed Amended Rule (PAR) 1178, Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities. Kinder Morgan operates bulk refined products storage terminals and pipeline transfer stations located within the South Coast Air Basin that are subject to Rule 1178.

SCAQMD PAR 1178 Rule Writing Staff released the preliminary draft Rule 1178 language and draft Staff report on February 17, 2023. KM respectfully offers the following comments on the draft rule language.

Inspection and Monitoring Requirements

1. **(f)(4)(E)** PAR 1178 (f)(4)(E) lists the subparagraphs of tank conditions for determining compliance. During the Public Workshop held on March 1, 2023, Staff indicated that the conditions in PAR 1178 (d)(1)(D), (d)(2)(C), and (d)(3)(C) had been added to the preliminary draft rule language to minimize the need for inspectors to make a confined space entry into the tank to access the floating roof during Component Inspections. The language in PAR 1178 (f)(4)(E) does not reference the allowance for Visible Vapors from the rim seal system as a means to determine compliance. As a result, during a Tank Farm Inspection, if Visible Vapors are observed from the peripheral or center vents, a confined space tank entry would be required to determine whether the rim seal systems are in compliance with PAR 1178 (d)(1)(C). Given that Tank Farm Inspections are required to be performed at least every seven days, the allowance of Visible Vapors during Tank Farm Inspections must be added to PAR 1178 (f)(4)(E) in order to maintain consideration for safety concerns. KM recommends revising the language by including the red and underlined text as follows.

4-1

Demonstration of compliance with subparagraphs (d)(1)(B), (d)(1)(C), clause (d)(4)(A)(ii)-(iii) or (d)(4)(A)(v), shall be made within 24 hours from when Visible Vapors were detected. Concurrent with a Tank Farm Inspection, a Component Inspection may be performed to demonstrate compliance with (d)(1)(D), (d)(2)(C), and (d)(3)(C). If compliance with applicable requirements cannot be demonstrated or is not determined, within 24 hours, the Storage Tank is non-compliant.

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Recordkeeping and Reporting Requirements

1. **(h)(1)(A)** PAR 1178 (h)(1)(A) requires facilities to make a notification within 8 hours when a non-compliant condition is identified. KM asserts that this notification is unnecessary. Rule 1178 currently has sufficient requirements to submit a written report within 120 hours of identifying a non-compliant condition in (h)(4), to maintain those records for at least five years in (h)(6), to make the records available upon request in (h)(6). The requirements have been in place since at least the April 7, 2006 amendment and were not determined to be insufficient in the subsequent 17 years. The draft Staff report did not provide any data or statements to conclude that reporting thus far has been inadequate. KM recommends removing the requirement to make a notification within 8 hours. 4-2

2. **(h)(2)(A)** PAR 1178 (h)(2)(A) requires facilities to report all Visible Vapors by phone within 8 hours of detection. Similar to PAR 1178 (h)(1)(A), KM asserts that this notification also is unnecessary. The draft Staff report did not provide any data or statements to conclude that existing reporting has been inadequate. With the frequency of OGI tank farm and component inspections, the requirement to report the occurrence of each Visible Vapor without confirmation of an actual non-compliance will create a burdensome level of notification and follow-up communication for facilities and Compliance Staff. Staff have added to existing requirements to ensure sufficient communication of non-compliance occurrences during OGI inspections. PAR 1178 (h)(2)(C) and (D) respectively will require records to be kept onsite when Visible Vapors are detected as well as the compliance determinations of PAR 1178(f)(4)(E) and for the Visible Vapors digital recording duration. Staff are retaining the requirements to submit a report within 120 hours of the non-compliance determination in PAR 1178 (h)(3) and to keep these records for five years and make the records available upon request PAR 1178 (h)(6). Additionally, Staff allow the provision for rim seal systems to have Visible Vapors during a Component Inspection per PAR 1178 (d)(1)(D), (d)(2)(C), and (d)(3)(C). PAR 1178 creates confusion as to which Visible Vapors are would be a deviation and when. KM recommends removing the requirement to make a notification within 8 hours. 4-3

Exemptions

1. **(j)(2)** PAR 1178(j)(2) exempts tanks that store Organic Liquid with a True Vapor Pressure equal to or less than 5 mmHg or (0.1 psia) under actual storage conditions, but requires the tanks to undergo OGI inspections per PAR 1178 (f)(4), complete the reporting requirements of (h)(1), and perform the recordkeeping requirements of (h)(6). Due to existing applicability in Rules 463 and 1178, external floating roof, internal floating roof, and fixed roof tanks storing Organic Liquids at or below this vapor pressure limit have not needed to comply with the control requirements in Rule 1178 (d). PAR 1178 (j)(2) references (1) conducting the OGI inspections in accordance with PAR 1178 (f)(4), which also requires demonstrating a Vapor Tight Condition, no Visible Gaps, and no Rim Seal Gap exceedances and (2) making an 8-hour notification when "identifying a Storage Tank that not in compliance with all applicable requirements of the rule..." [KM assumes the (h)(1) reference is intended to be (h)(2) as the requirement is discussing OGI inspections]. The observation of Visible Vapors from these tanks would cause them to be in a state of deviation from conditions to which they are not currently subject. The ramifications are that PAR 1178 no longer exempts these tanks from the majority of Rule 1178 and circumvents the permitting process. KM asserts that this was not the intent of PAR 1178 or Staff, and that performing OGI inspections on Organic Liquids at or below 5 mmHg or (0.1 psia) True Vapor Pressure will only create confusion when attempting to determine compliance with PAR 1178 and tank and facility permit conditions. KM recommends revising the language by removing red and struck-through text as follows. 4-4

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Storage Tanks that do not have a Potential For VOC Emissions of 6 tons per year or greater used in Oil Production and are storing Organic Liquid with a True Vapor Pressure equal to or less than 5 mm Hg (0.1 psi) absolute under actual storage conditions are exempt from the requirements of this rule, with the exception of the requirements specified in paragraphs ~~(f)(4), (h)(1) and (h)(6)~~, provided the owner or operator demonstrates that the Organic Liquid stored has a True Vapor Pressure of 5 mm Hg (0.1 psi) absolute or less under actual storage conditions semi-annually.

4-4

- 2. Comment 4-33** from the February 1, 2023 WSPA letter recommended including an exemption from OGI inspections for tanks that are out of service. A tank that has been taken out of service, as described in Comment 4-5, is understood within KM to mean that the tank has been emptied of Organic Liquid product and opened to atmosphere (manways open) for the purposes of tank entry to perform planned maintenance or repair and planned inspections (API 653, 40 CFR 60 Subpart KB, current rule 463 (e)(3)(B), current Rule 1178 (f)(2)(B), etc.). Rule 1149 (c)(1) presents the control requirements based on capacity and the Organic Liquid's Reid vapor pressure in order for a tank to be opened to the atmosphere. The tank is no longer storing Organic Liquids that would generate VOC emissions. Upon refilling with Organic Liquid, the tank would then become subject to the OGI inspection requirement. KM supports adding clarification to PAR 1178 to exempt tanks from OGI inspections that are out of service with opened manways in accordance with Rule 1149.

4-5

Sincerely,



William Toepfer
Director of Operations
Kinder Morgan

cc: Michael Morris, Michael Krause, Rodolfo Chacon, SCAQMD
Peter Jensen, Nina McAfee, Cinnamon Smith, Kinder Morgan

1001 Louisiana Street, Suite 1000, Houston, TX 77002

Comment 4-1

Paragraph (f)(4) was revised to allow an inspection for defects in the rim seal system during a tank farm inspection when vapors are detected from a tank and determined and originate from the rim seal system. If a defect is identified in the rim seal system, a facility is required make any necessary repairs within 3 days.

Comment 4-2

See response to Comment 2-5.

Comment 4-3

See response to Comment 2-5.

Comment 4-4

See response to Comment 2-1.

Comment 4-5

The rule language has been revised to exempt tanks that are out of service from OGI inspections.

5. R.A. Nichols Engineering, Received March 15, 2023



Proposed Rule 1178
Comments Regarding Proposed Rules Regarding
OGI Inspections, Reporting & Recordkeeping

R. A. Nichols Engineering would like to provide the following comments on the proposed Rule 1178, Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities. R.A. Nichols Engineering works with many of the stake holders for Rule 1178 and we plan to assist our customers to achieve compliance with the new rule conditions when implemented.

R. A. Nichols Engineering supports the AQMD’s mission to control fugitive emissions and mass emission generating events and tightening the existing standards to achieve these goals. We believe in incorporating new technologies and tools into new rules to assist industry in compliance and to protect personnel from dangers inherent to Petroleum Facilities. We believe that OGI inspections could be a very useful tool to reduce fugitive emissions and mass emission generating events, especially for fixed roof tanks and are excited to see this technology utilized for this purpose. We believe the current rule language around OGI Inspections still needs additional refinement before implementation. Please see our comments below.

PROPOSED AMENDED RULE 1178 - FURTHER REDUCTIONS OF VOC EMISSIONS FROM STORAGE TANKS AT PETROLEUM FACILITIES

(c) Definitions

(4) COMPONENT INSPECTION is monitoring of a Storage Tank roof and individual components, including but not limited to Roof Openings and Rim Seal Systems, with an Optical Gas Imaging Device and where the person conducting the inspection can clearly view each component through the Optical Gas Imaging Device.

RANE Comment: (d)(1)(D) Specifically states that “Rim Seal Systems are not required to be free of Visible Vapors during a Component Inspection.” By including the highlighted language it indicates that Rim Seal Systems need to be monitored but don’t trigger reporting or non-compliance?

(42) TANK FARM INSPECTION is monitoring of all applicable Storage Tanks at a Facility with an Optical Gas Imaging Device and where the person conducting the inspection can clearly view the top of the tank shell, and fixed roof or dome, if applicable. Tank Farm Inspections may be conducted at an elevated position, at ground level, or a combination of both.

RANE Comment: If inspection requires the top of the tank shell, and fixed roof or dome be visible and the inspection can be done at ground level, is the use of drones to complete inspection acceptable? Is there a maximum distance that the tank farm can be inspected from?

(47) VISIBLE VAPORS is any vapors detected with an Optical Gas Imaging Device during a Component or Tank Farm Inspection, when operated and maintained in accordance with manufacturer training, certification, user manuals, specifications, and recommendations.

RANE Comment: Are Rim Seals included in this definition, because you state that ALL Visible Vapors must be reported (h)(2)(A). This definition appears to also include any equipment that maybe scanned during a Tank Farm Inspection, even if not covered by this rule?

5-1

5-2

5-3



Proposed Rule 1178

Comments Regarding Proposed Rules Regarding OGI Inspections, Reporting & Recordkeeping

(d) Requirements

- (1) External Floating Roof Tanks
- (D) Tank Condition Requirements

The owner or operator of an External Floating Roof Tank shall maintain the tank in a condition that is free of Visible Vapors, except when compliance with subparagraphs (d)(1)(B) and (d)(1)(C) can be demonstrated pursuant to subparagraphs (f)(4)(E). **Rim Seal Systems are not required to be free of Visible Vapors during a Component Inspection.**

5-4

RANE Comment: Are Rim Seal findings reportable, do they require record keeping?

(f) Inspection and Monitoring Requirements

- (4) Optical Gas Imaging Instrument (OGI) Inspections

Effective January 1, 2024, the owner or operator shall demonstrate compliance with subparagraphs (d)(1)(D), (d)(2)(C), (d)(3)(C) and (d)(4)(C), by conducting OGI inspections in accordance with the following requirements:

5-5

(A) Inspections shall be conducted by a person who has completed a manufacturer's certification or training program for the OGI device used to conduct the inspection.

RANE Comment: To understand what is a tank component for documentation, shouldn't the OG Operator be required to be or be accompanied by a Certified Person?

(C) Tank Farm Inspections shall be conducted at least every 7 calendar days since the last Tank Farm Inspection was conducted.

5-6

RANE Comment: Process required if inspection is not able to be done within the 7 calendar days? Does an incomplete inspection reset the 7 day timer?

(D) Component Inspections shall be conducted for floating roof tanks according to the following schedules:

(i) In the 3rd month after an inspection required by paragraph (f)(1) for external floating roof tanks.

5-7

(ii) Semi-annually for domed External Floating Roof Tanks and Internal Floating Roof Tanks.

RANE Comment: Can the OGI component inspection be done in conjunction with the semiannual 1178 inspection for domed external floating roof tanks and internal floating roof tanks?

(E) Demonstration of compliance with subparagraphs (d)(1)(B), (d)(1)(C), clause (d)(4)(A)(ii)-(iii) or (d)(4)(A)(v), shall be made within 24 hours from when Visible Vapors were detected. If compliance with applicable requirements cannot be demonstrated or is not determined, within 24 hours, the Storage Tank is non-compliant.

5-8

RANE Comment: If visible vapors are detected for External Floating Roof Tank with Domed Roof or Internal Floating Roof tank, the language above indicates visible vapors would trigger a Rim Seal inspection per (d)(1)(C), even though the Rim Seal Systems are not required to be free of Visible Vapors per (d)(1)(D). Can the language be changed to specifically require External



Proposed Rule 1178 Comments Regarding Proposed Rules Regarding OGI Inspections, Reporting & Recordkeeping

Floating Roof Tanks to comply with (d)(2)(D) and Internal Floating Roof Tanks to comply with (d)(3)(D), the LEL requirements to prove compliance. 5-8

(h) Reporting and Recordkeeping Requirements

(2) For OGI inspections required by subparagraph (f)(4), the owner or operator shall:

(A) Report all Visible Vapors to the Executive Officer by phone (1-800-CUT-SMOG or 1-800-288-7664) within 8 hours of detection. 5-9

RANE Comment: Are Rim Seal findings, tanks exempt from 1178 or other non-tank visible vapor indications reportable?

(C) Keep records Visible Vapors detected during a Tank Farm Inspection, including tank identification, date of inspection, and findings. Findings shall include identification of tanks from which Visible Vapors were identified, any determinations made pursuant to subparagraph (f)(4)(E), and corrective measures taken, if applicable. 5-10

(D) Record all Visible Vapors from tanks for a minimum of 5 seconds. Digital recordings shall be accurately time-stamped and kept on-site for a minimum of 2 years to be made available to the Executive Officer upon request.

RANE Comment: Do visible vapors detected from tanks not covered by Rule 1178 require recordkeeping?

Thank you for reviewing our comments and allowing us to participate in the Rule Development Process.

Comment 5-1

See response to Comment 2-2.

Comment 5-2

Staff is not currently proposing to allow the use of drones. If it is anticipated that drones will be an effective method to comply with the OGI inspections requirements of PAR 1178, staff encourages stakeholders to meet with staff to discuss the utilization of a drone. PAR 1178 does not specify a maximum distance for which tank farm inspections must be conducted within. The qualified person conducting the tank farm inspection should be able to determine an appropriate maximum distance at which the OGI device used is effective.

Comment 5-3

Paragraph (h)(2) has been revised to require reporting of visible vapors detected during tank farm inspections emitted from a component required to be maintained in a vapor tight condition or in a condition with no visible gaps, or visible vapors detected that are resulting from defective equipment. South Coast AQMD staff finds it beneficial to inform South Coast AQMD Compliance staff when visible vapors are detected during a tank farm inspection given the likelihood that emissions are significant and indicative of a leak. Equipment that is not subject to Rule 1178 is not subject to the requirements of Rule 1178. If visible vapors are detected from other sources not subject to Rule 1178, the facility is not required to act unless specifically required by another rule, regulation, permit condition, or other requirement.

Comment 5-4

See response to Comments 2-2 and 2-5.

Comment 5-5

PAR 1178 component inspections require inspection of the tank roof and individual components including roof openings and rim seal systems. The facility is responsible for complying with all requirements of PAR 1178, including reporting, and may use a certified person.

Comment 5-6

Clause (f)(4)(B)(i) was revised to require tank farm inspections at least once every calendar week. Any required inspection that is not conducted is a violation of the rule with an exception for documented~~to~~ time periods where unsafe conditions exist.

Comment 5-7

Clause (f)(4)(C)(i) was revised to require semi-annual inspections for floating roof tanks that may be conducted when other required inspections are conducted.

Comment 5-8

See response to comment 2-2. Staff does not propose to allow compliance with LEL requirements as a demonstration to show compliance with tank condition requirements to be free of visible vapors. The OGI device can detect vapors that are indicative of a malfunction in the rim seal system other controls. LEL readings in compliance with the requirements of the rule may not indicate a potential malfunction of the rim seal system or other controls.

Comment 5-9

See responses to Comments 2-5 and 5-3.

Comment 5-10

See response to Comment 5-3.

6. Shell Oil Products US, Received March 15, 2023



Shell Oil Products US
Carson Distribution Terminal
20945 S. Wilmington Ave.
Carson, CA 90810-1039

March 10, 2023

Melissa Gamoning
Air Quality Specialist
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Re: SCAQMD Proposed Rule Changes to Rule 1178

Dear Ms. Gamoning:

Thank you for this opportunity to submit these comments on the Proposed Amended Rule (PAR) 1178. Shell appreciates the opportunity to participate in the South Coast Air Quality Management District (SCAQMD) PAR 1178 public workshops. Shell operates four facilities in the South Coast Air Basin that will be impacted by the SCAQMD's PAR 1178.

SCAQMD has presented the proposed amendments to Rule 1178 during various public workshops with the most recent on March 1, 2023. Shell offers the following comments:

1. SCAQMD is proposing to remove the true vapor pressure (TVP) threshold in Rule 1178.

The proposed rule as currently written requires OGI monitoring of all tanks subject to the rule, including low TVP tanks such as diesel. But section (j)(2) exempts tanks storing low vapor pressure liquids (≤ 0.1 psia) from any type of control requirements. Therefore, if visible emissions were discovered on a low TVP tank, the regulation does not require repair. Visible emissions would not be expected during OGI inspections of low TVP tanks and in our discussions with folks who have done these inspections, they have not ever observed visible emissions from equipment in diesel service. It is likely that the only time an OGI inspection would find visible emissions at a tank in low-TVP liquid service would be if the liquid in that tank was not below 0.1 psia. To ensure that the low TVP tanks really are low TVP tanks, the rule already requires a demonstration of low TVP twice per year. This should be adequate to ensure all tanks that need to be monitored with OGI are monitored with OGI. Shell requests that the requirement to perform OGI inspections on low TVP liquids be removed from the rule.

6-1

2. SCAQMD has shared high level data in the cost-effectiveness analysis. Shell would like to better understand and gain more clarity on the extent of this cost-effectiveness analysis.

6-2

Can SCAQMD share additional cost-effectiveness data to better help understand documented conclusions in the rulemaking? What other items did SCAQMD evaluate in the analysis other than what has been made available? The available analysis data did not make it clear whether items such as repair costs, lost productivity costs, and practical life of the equipment were addressed or captured.

6-2

3. SCAQMD is proposing exemptions for tanks storing organic liquid with TVP <0.1 psia, as demonstrated semi-annually, from all requirements except OGI inspections and associated reporting.

Exemption (j)(2) specifies requirements provided the owner or operator demonstrates that Organic Liquid stored has a TVP of 0.1 psi absolute or less under actual storage conditions semi-annually. The rule does not specify what an acceptable form of demonstration is. Are published TVP values acceptable? SDS? Vapor pressure measurements of distillate products such as jet fuel and diesel are not typically taken while the products are in storage.

6-3

Shell appreciates the opportunity to provide these comments related to the proposed amendments to Rule 1178. We look forward to continued discussion of this important rulemaking. If you have any questions, please contact me at (310) 816-6025 or via e-mail at christopher.sherman@shell.com.

Sincerely,



Christopher Sherman
Environmental Advisor

Cc: Rodolfo Chacon, SCAQMD
Mike Morris, SCAQMD
Michael Krause, SCAQMD

Comment 6-1

See response to Comment 2-1.

Comment 6-2

Multiple cost-effectiveness analyses were conducted as part of the rule development and were detailed in the staff report that included discussion about maintenance, loss of productivity, and equipment life. Details of the cost-effectiveness analysis are contained in this report.

Comment 6-3

Rule 1178 currently contains test methods for demonstrating true vapor pressure greater than 0.1 psia (or 0.1 psia and less) in subdivision (i). PAR 1178 will retain the same methods for demonstrating TVP of organic liquids to determine applicability to rule requirements.

7. Western States Petroleum Association, Received March 15, 2023



Patty Senecal
Director, Southern California Region

March 15, 2023

Mike Morris
Manager, Planning and Rules
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Via e-mail at: mmorris@aqmd.gov

Re: SCAQMD Proposed Amended Rule 1178, Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities, and Proposed Amended Rule 463, Organic Liquid Storage – WSPA Comments on Rulemaking Process and Preliminary Draft Rule Language

Dear Mr. Morris,

Western States Petroleum Association (WSPA) appreciates the opportunity to participate in the Working Group Meetings (WGMs) for South Coast Air Quality Management District (SCAQMD or District) Proposed Amended Rule 1178, Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities (PAR 1178). WSPA is a non-profit trade association representing companies that explore for, produce, refine, transport, and market petroleum, petroleum products, natural gas, renewable fuels, and other energy supplies in five western states including California. WSPA has been an active participant in air quality planning issues for over 30 years. WSPA-member companies operate petroleum refineries and other facilities in the South Coast Air Basin that will be impacted by PAR 1178 and Proposed Amended Rule 463 (PAR 463), Organic Liquid Storage.

The California Health & Safety Code (HSC) requires the District, in adopting any Best Available Retrofit Control Technology (BARCT) standard, to ensure the standard is technologically feasible, and take into account “environmental, energy, and economic impacts” and to assess the cost-effectiveness of the proposed control options.¹ Cost-effectiveness is defined as the cost, in dollars, of the control alternative, divided by the emission reduction benefits, in tons, of the control alternative.² If the cost per ton of emissions reduced is less than the established cost-effectiveness threshold, then the control method is considered to be cost-effective. Cost-effectiveness evaluations need to consider both capital costs (e.g., equipment procurement, shipping, engineering, construction, and installation) and operating (including expenditures associated with utilities, labor, and replacement) costs. Currently, the District is applying a cost-effectiveness threshold of \$36,000 per ton of VOC emissions reduced, consistent with the 2022 Air Quality Management Plan (2022 AQMP).³

As discussed in previous comment letters, the cost-effectiveness analysis presented is incomplete. In estimating costs for doming of external floating roof tanks, the District has not included potential operation and maintenance (O&M) costs. When O&M costs are included, the

7-1

¹ California Health & Safety Code §40406, 40440, 40920.6.

² California Health & Safety Code §40920.6.

³ SCAQMD Draft Final 2022 Air Quality Management Plan. Available at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>.

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doming of crude oil tanks exceeds the cost effectiveness threshold.^{4,5} Additionally, SCAQMD has significantly overstated the potential emission reductions for doming of external floating roof crude oil tanks by assuming an RVP of 8.19 psi across all tanks modeled. WSPA believes Staff needs to consider RVP as a parameter in establishing appropriate classes and categories for the BARCT assessment and revise the emissions modeling to obtain more realistic emissions estimates.

7-1
7-2

WSPA understands from the March 17, 2023 Stationary Source Meeting presentation that Staff is now proposing a bifurcation of PAR 1178 to address EPA concerns separately from other updates related to the BARCT analysis.⁶ WSPA agrees that there are a number of outstanding issues with the BARCT analysis that need to be resolved which will require additional stakeholder engagement. For this reason, WSPA supports the District's proposal to bifurcate the proposed rule.

7-3

On February 17, 2023, SCAQMD released new preliminary draft rule language for PAR 1178 and PAR 463.^{7,8} WSPA offers the following comments.

- 1. SCAQMD has held no additional WGMs since its release of PAR 1178 rule language. The District has held no working group meetings for PAR 463 since opening the rule for amendment. SCAQMD has stated that they are adding rule language to PAR 463 and PAR 1178 to address the EPA disapproval of the California Air Resources Board (CARB) Oil and Gas Regulation. WSPA agrees that SCAQMD needs to bifurcate the rule so CARB requirements can be addressed in a timely manner. This will also allow additional time to ensure proper analysis and provide an opportunity for stakeholders to comment on the unsettled portions of the draft rule language.**

SCAQMD held seven working group meetings during the PAR 1178 rulemaking process, with the most recent meeting held on January 5, 2023. SCAQMD has held no working group meetings for PAR 463.

7-4

Since the last PAR 1178 working group meeting held on January 5th, SCAQMD has released the following⁹:

- January 11, 2023 – PAR 1178 Initial Preliminary Draft Rule Language
- February 9, 2023 – PAR 463 Initial Preliminary Draft Rule Language
- February 9, 2023 – Updated PAR 1178 Initial Preliminary Draft Rule Language
- February 17, 2023 – PAR 1178 Preliminary Draft Rule Language
- February 17, 2023 – PAR 463 Preliminary Draft Rule Language
- February 17, 2023 – PAR 463/1178 Preliminary Draft Staff Report

A public workshop was held for both rulemakings on March 1, 2023. It is highly unusual for the District to release draft rule language with no opportunity for stakeholder discussion at a

7-5

⁴ WSPA Comment Letter dated January 19, 2023. Available in PAR 1178 Preliminary Draft Staff Report at: <http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1178/par-1178-preliminary-draft-staff-report.pdf?sfvrsn=6>.

⁵ WSPA Comment Letter dated March 1, 2023.

⁶ SCAQMD Stationary Source Committee presentation, March 17, 2023. Available at: <http://www.aqmd.gov/docs/default-source/Agendas/ssc/ssc-agenda-3-17-2023.pdf?sfvrsn=10>.

⁷ PAR1178: Preliminary Draft Rule Language. Available at: <http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1178/par-1178-preliminary-draft-rule-language.pdf?sfvrsn=6/>

⁸ PAR 463: Preliminary Draft Rule Language. Available at: <http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1178/par-463-preliminary-draft-rule-language.pdf?sfvrsn=6>.

⁹ PAR 1178 and PAR 463 Rulemaking Documents. Available at: <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-1178/>

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working group meeting. In this case, there have been significant changes in each of the draft rule language documents since the last WGM, and it has been difficult to fully review and understand the impacts of these changes. Similarly, while the District presented their incremental cost effectiveness analysis in the Preliminary Draft Staff Report (PDSR), there has been no opportunity for stakeholders to review and comment on this analysis in a working group meeting.

7-5

While the District has stated that they are open to receiving information on such items as O&M costs and timeline for inspections, SCAQMD has not conducted an organized survey to request such information from facilities subject to these rules.

7-6

SCAQMD has stated that they are adding rule language to PAR 463 and PAR 1178 to address the EPA disapproval of the California Air Resources Board (CARB) Oil and Gas Regulation. CARB has requested that the changes impacting the EPA disapproval be in place by May 2023 so that they can meet their timeline. The proposed updates to address EPA disapproval are not applicable to petroleum refinery operations and address VOC emissions in the upstream oil and natural gas industry. The current rulemaking provides a sense of urgency that is more focused on completing the rulemaking process based on CARB's timeline than providing an appropriately analyzed and factually supported rule with stakeholder input. SCAQMD needs to bifurcate the rule such that CARB's concerns can be addressed on the appropriate timeline. This would also allow stakeholders time to fully understand the impacts of the rule language and the ability to comment on appropriate changes, and for the District to make adjustments as necessary.

7-7

2. The District has not completed all of the cost-effectiveness analyses required under the California Health and Safety Code. Incremental cost-effectiveness of each progressively more stringent control option must be analyzed and compared to the cost-effectiveness threshold.

HSC Section 40920.6 prescribes two different cost-effectiveness analyses for BARCT rules¹⁰:

- 40920.6(a)(2): "Review the information developed to assess the cost-effectiveness of the potential control option. For purposes of this paragraph, "cost-effectiveness" means the cost, in dollars, of the potential control option divided by emission reduction potential, in tons, of the potential control option."; and
- 40920.6(a)(3): "Calculate the incremental cost-effectiveness for the potential control options identified in paragraph (1). To determine the incremental cost-effectiveness under this paragraph, the district shall 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."

7-8

In the Public Workshop held on March 1, 2023, the District presented estimated emission reductions from each proposed BARCT requirement.¹¹ Proposed requirements include:

7-9

- Weekly OGI inspections

¹⁰ California Health and Safety Code 40920.6.

¹¹ PAR 1178 Public Workshop. Available at: http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1178/pars-463-1178_public-workshop.pdf?sfvrsn=6.

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- Doming for crude oil tanks
- 98% emission control for fixed roof tanks
- Secondary seals for internal floating roof tanks
- More stringent gap requirement

The District has not performed an incremental cost effectiveness analysis that evaluates each of the above control technologies against the other. Weekly OGI inspections for various types of tanks, including those that are <0.1 psi total vapor pressure, should be evaluated on an incremental basis to understand the incremental cost effectiveness of each control option. An incremental analysis on OGI inspections should be performed as follows:

1. Weekly OGI inspections for all tanks including those with less than 0.1 psia TVP;
2. Weekly OGI inspections for internal floating roof tanks greater than 0.1 psia TVP;
3. Weekly OGI inspections for domed external floating roof tanks greater than 0.1 psia TVP;
4. Weekly OGI inspections for external floating roof tanks greater than 0.1 psia TVP;
5. Weekly OGI inspections for fixed roof tanks greater than 0.1 psia TVP

Further incremental analysis should be performed to understand how the cost-effectiveness of the above OGI inspections and other proposed requirements compare, including:

6. More stringent gap requirements;
7. Secondary seals for internal floating roof tanks greater than 0.1 psia TVP; and
8. Doming for tanks storing material greater than 3 psia TVP.

Such incremental cost-effectiveness analyses are necessary to evaluate the cost per emission reduction for each progressively more stringent control option as compared to the next less expensive control option. Since the District is required to perform both cost-effectiveness evaluations to determine a BARCT standard, the District must include both analyses in its evaluation of proposed BARCT limits.

3. PAR 1178(b), Applicability:

The proposed rule language for the applicability section would remove the reference to true vapor pressure of organic liquids in storage tanks. Removal of this reference would result in tanks that were previously exempt from the rule (e.g., diesel or jet fuel storage tanks) becoming subject to the rule. SCAQMD has provided no technical basis for such a scope change. Absent this, the reference to true vapor pressure requirements should be re-added to the proposed rule.

The current rule language states that the rule applies to storage tanks used to store organic liquids with a true vapor pressure greater than 5 mm Hg (0.1 psi) absolute under actual storage conditions. The applicability section in the proposed rule language removes the reference to the true vapor pressure of the organic liquid stored. Removal of this reference would cause tanks that were previously exempt from the rule, such as diesel or jet fuel storage tanks, becoming subject to the rule. SCAQMD has provided no technical basis for such a change, nor have they presented stakeholders with impacts or costs. The Preliminary Draft Staff Report also does not describe this change in the section that discusses updates made to the applicability language. Since SCAQMD has provided no information demonstrating that organic liquids with a true vapor pressure less than 5 mm Hg have the potential to cause

7-9

7-10

7-11

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considerable emissions, WSPA recommends that the PAR 1178 Applicability section be updated as follows:

(b) Applicability

The rule applies to all aboveground Storage Tanks that have capacity equal to or greater than 75,000 liters (19,815 gallons), are used to store Organic Liquids with a true vapor pressure greater than 5 mm Hg (0.1 psi) absolute under actual storage conditions and are located at any Petroleum Facility that emits more than 40,000 pounds (20 tons) per year of VOC as reported in the Annual Emissions Report pursuant to Rule 301 - Permit Fees in any emission inventory year starting with the Emission Inventory Year 2000. This rule also applies to all aboveground Storage Tanks with Potential for VOC Emissions of 6 tons per year or greater used in Crude Oil Production.

7-11

4. PAR 1178(c), Definitions.

The District should update the definition of Emission Inventory Year to align with the District's Annual Emissions Reporting (AER) program requirements. Additionally, WSPA recommends an exemption from OGI inspections for Out of Service tanks and is therefore proposing a new definition be added for Out of Service.

(c)(7): Emission Inventory Year

Facilities within the SCAQMD are required to report emissions under the Annual Emissions Reporting (AER) Program. This program requires reporting based on a calendar year (referred to as "Data Year").¹² The definition of Emission Inventory Year should be updated to be consistent with the AER requirements.

7-12

WSPA recommends that the definition of Emission Inventory Year be updated as follows:

EMISSION INVENTORY YEAR is the annual emission-reporting period from January 1 – December 31 beginning from July 1 of the previous year through June 30 December 31 of a given year. For example, Emission Inventory Year 2000 covers the period from July 1, 1999 through June 30, 2000.

(c): Out of Service

WSPA is proposing a new exemption from OGI inspections for tanks that are out of service. WSPA is therefore proposing a new definition be added to Section (c). The suggested definition is presented below:

7-13

[New Section]

OUT OF SERVICE means the tank has lost suction, has met the requirements of Rule 1149, and is open to the atmosphere.

7-14

5. PAR 1178(d), Requirements:

¹² SCAQMD Annual Emission Reporting Overview. Available at: <https://www.aqmd.gov/home/rules-compliance/compliance/annual-emission-reporting>.

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SCAQMD is proposing more stringent rim seal gap requirements and more stringent control efficiency for emission control systems. Staff have not performed the analyses required by the California Health and Safety Code to demonstrate that the proposed requirements are both technically feasible and cost effective. Further, the District is taking credit for emission reductions even though they state that there are no costs associated with certain proposed requirements. If the tanks already meet the proposed requirements, as asserted in the PDSR, then there would be no creditable reductions available.

7-14

(d)(1)(C): Rim Seal Requirements

SCAQMD has proposed modifying the gap specifications in section (d)(1)(C)(iii). Staff noted that they examined gap measurement inspection reports of a “statistically significant percentage” of tanks and found that all tanks reviewed would be in compliance with more stringent gap requirements.¹³ Because the 10% of tanks reviewed were found to be in compliance with the proposed requirement, SCAQMD reports it did not perform a cost-effectiveness analysis for the proposed change.

The California Health and Safety Code (HSC) states¹⁴:

(a) Prior to adopting rules or regulations to meet the requirement for best available retrofit control technology pursuant to Sections 40918, 40919, 40920, and 40920.5, or for a feasible measure pursuant to Section 40914, districts shall, in addition to other requirements of this division, do all of the following:

7-15

(1) Identify one or more potential control options which achieves the emission reduction objectives for the regulation.

(2) Review the information developed to assess the cost-effectiveness of the potential control option. For purposes of this paragraph, “cost-effectiveness” means the cost, in dollars, of the potential control option divided by emission reduction potential, in tons, of the potential control option.

The District has identified a potential control option. However, Staff have not performed the stringent analysis required by the HSC to ensure that the control is both technically feasible and cost-effective. Relying on results from tank inspections on only 10% of tanks, dismisses the possibility that a significant percentage of tanks may not be able to comply with the revised limits. Rim seals on existing tanks were designed and engineered to meet the gap specifications in the current rule. Because tanks are not round, if a facility adjusts the rim seal gap on one section of a tank, it could affect the rim seal gap at other parts of the tank. Thus, changing the gap specifications as proposed could potentially result in a refinery being required to completely reengineer both the floating roof and its seal.

7-16

Such a proposal would require a complete BARCT analysis, including evaluation of technical feasibility, potential compliance costs, and potential emission reductions benefits. To our knowledge, SCAQMD has not performed an evaluation on the technical feasibility or potential

¹³ PAR 1178 Working Group Meeting #5. Available at: <http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1178/par1178-wgm5-final.pdf?sfvrsn=12>.

¹⁴ California Health and Safety Code §40920.6. Available at: <https://codes.findlaw.com/ca/health-and-safety-code/hsc-sect-40920-6/>.

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compliance cost. Interestingly, even though the District states that all tanks already meet the revised gap requirement, they are still taking credit for reductions in the amount of 0.01 tons VOC per day.¹⁵ If all tanks are meeting the proposed requirement, which has not been shown, then there would be no reductions expected. WSPA recommends that SCAQMD remove the proposed changes to section (d)(1)(C).

7-16
7-17

(d)(4)(A)(i): Fixed Roof Tanks

SCAQMD has proposed that Fixed Roof Tank emissions be vented to a Fuel Gas System or an Emissions Control System with an overall control efficiency of 98%. The control efficiency in the current rule is 95%. In the Preliminary Draft Staff Report, SCAQMD notes that the most common type of vapor recovery system used on fixed roof tanks are combustion systems, with one supplier guaranteeing 98% control efficiency on such systems.¹⁶ Adsorption systems have higher capital costs and are less desirable for tanks, and the same supplier guaranteed 95% control efficiency for such systems.¹⁷ The District reviewed four initial performance tests, which all showed greater than 99% control efficiency.¹⁸ The District has not defined the number of vapor recovery systems in the regulated community, nor have they presented information that supports their claim that existing operating emission control systems already meet the proposed control efficiency.¹⁹ Current permits are issued based on a 95% control efficiency. If the District intends to update the control efficiency requirement, they should provide further information to support the assertion that this requirement can be met by all existing fixed roof tanks with vapor recovery systems. If the District is unable to provide technical evidence to support their assertion, such a rule change would require a complete BARCT analysis, including evaluation of technical feasibility and potential compliance costs.

7-18

Furthermore, it is unclear why the District is claiming 0.02 tons per day of VOC emission reductions from this proposed change. If the existing emission control systems already meet the proposed control efficiency, as asserted in the PDSR, then there would be no creditable reductions available.

7-19

WSPA recommends that the language revert back to the current rule language:

The tank emissions are vented to an emission control system with an overall control efficiency of at least 95% by weight or the tank emissions are vented to a fuel gas system.

6. PAR 1178(f), Inspection and Monitoring requirements:

Section (f)(4) proposes requirements for Optical Gas Imaging (OGI) inspections and requires that a demonstration of compliance be made within 24 hours of detection of visible vapors. The proposed rule further states that if compliance with applicable requirements cannot be demonstrated or is not determined, within 24 hours, the Storage Tank is deemed non-compliant. Some tanks may show evidence of vapors

7-20

¹⁵ SCAQMD PAR 1178 Working Group Meeting #5. Available at: <http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1178/par1178-wgm5-final.pdf?sfvrsn=12>.

¹⁶ SCAQMD Preliminary Draft Staff Report. Available at: <http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1178/par-1178-preliminary-draft-staff-report.pdf?sfvrsn=6>.

¹⁷ Ibid.

¹⁸ Ibid.

¹⁹ SCAQMD PAR 1178 Working Group Meeting #7 Presentation. Available at: http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1178/par-1178_wgm7_fin.pdf?sfvrsn=6.

during an OGI inspection, even when the tank is operating in compliance with rule requirements. The statement regarding non-compliance should therefore be stricken from the proposed rule language. Additionally, if a tank is found to have visible vapors, but is operating in compliance, no repairs or adjustments would be made. However, this same result would be expected during the next inspection. A facility would be forced to monitor, assess compliance, and monitor again in an endless cycle. A timeline should be added for tanks that are already demonstrated to be in compliance to break the cycle of re-inspecting every time visible vapors are detected.

7-20

Section (f)(4) sets forth the requirements for Optical Gas Imaging (OGI) Inspections. Section (f)(4)(C) requires that the Tank Farm Inspection be conducted at least every 7 calendar days since the previous inspection. This requirement will cause issues in planning, as the facilities will need to bring the inspection forward a day each time there is a holiday. WSPA recommends that the frequency be updated to once each calendar week.

7-21

Section (f)(4)(E) states that demonstrations of compliance with Section (d) requirements must be made within 24 hours. 24 hours is an extremely short timeframe in which to access the tank and perform an inspection. Gap measurements must be performed inside a tank. A facility would need to quiet the tank prior to entering to verify compliance. This can be difficult on a tank under high use. Three (3) days is a more reasonable time schedule to demonstrate compliance. Additionally, the rule language should specify the methodology for determining compliance with Section (d) requirements.

7-22

More importantly, some tanks may show evidence of visible vapors during an OGI inspection, even when the tank is operating in compliance with rule requirements. If a tank is found to have visible vapors, but is operating in compliance, no repairs or adjustments would be made. However, this same result could be expected during the next OGI inspection. A facility could be forced to monitor, assess compliance, and monitor again in an endless cycle. A timeline should be added for tanks that are already demonstrated to be in compliance to break the cycle of re-inspecting every time evidence of vapors is found.

Finally, the presence of visible vapors does not necessarily indicate that a tank is not in compliance. The rule provides limits on gap length and cumulative length. It is understood that there are working and breathing losses from these tanks. Section (d)(1)(D) states:

7-23

(d)(1)(D) ...Rim Seal Systems are not required to be free of Visible Vapors during a Component Inspection.

The statement regarding non-compliance in (f)(4) should therefore be stricken from the proposed rule language.

WSPA recommends the proposed language be updated as follows:

*(f)(4) Optical Gas Imaging Instrument (OGI) Inspections
Effective January 1, 2024, the owner or operator shall demonstrate compliance with subparagraphs (d)(1)(D), (d)(2)(C), (d)(3)(C) and (d)(4)(C), by conducting OGI inspections in accordance with the following requirements:*

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(A) Inspections shall be conducted by a person who has completed a manufacturer's certification or training program for the OGI device used to conduct the inspection.

(B) The person conducting the inspection shall operate and maintain the OGI device in accordance with the manufacturer's specifications and recommendations.

(C) Tank Farm Inspections shall be conducted at least ~~every 7 calendar days since the last Tank Farm Inspection was conducted~~ once per week.

7-21
Cont.

(D) Component Inspections shall be conducted for floating roof tanks according to the following schedules:

(i) In the 3rd month after an inspection required by paragraph (f)(1) for external floating roof tanks.

(ii) Semi-annually for domed External Floating Roof Tanks and Internal Floating Roof Tanks.

(E) Demonstration of compliance with subparagraphs (d)(1)(B), (d)(1)(C), clause (d)(4)(A)(ii)-(iii) or (d)(4)(A)(v), shall be made ~~using the methodology specified in (f)(1), (f)(2), or (f)(3), as applicable, within 24 hours~~ 3 days from when Visible Vapors were detected. ~~If compliance with applicable requirements cannot be demonstrated or is not determined, within 24 hours, the Storage Tank is non-compliant. If an inspected tank is demonstrated to be in compliance, another demonstration of compliance is not required unless evidence of Visible Vapors is found and 3 months have elapsed since the previous demonstration of compliance.~~

7-22
&
7-23
Cont.

7. PAR 1178(g), Maintenance Requirements

WSPA recommends that the proposed rule language be updated to allow a facility 3 days to repair a tank instead of 72 hours. This update would make the language consistent with the requirements of Rules 1173 and 1176.

PAR 1178(g) proposes new maintenance requirements in response to deficiencies found during inspections. WSPA recommends that SCAQMD update the allowable timeframe for repairs to 3 calendar days to be consistent with Rules 1173 and 1176. WSPA proposes language be updated as follows:

7-24

(g) The owner or operator shall repair, or replace any materials or components, including but not limited to, piping, valves, vents, seals, gaskets, or covers of Roof Openings or seals that do not meet all the requirements of this rule before filling or refilling an emptied and degassed storage tank, or within ~~72 hours~~ 3 calendar days after an inspection, including one conducted by the owner or operator or the contracted third-party as specified in subdivision (f).

8. PAR 1178(h), Record Keeping and Reporting Requirements

The presence of visible vapors is not necessarily indicative of a tank being out of compliance. Therefore, a facility should not be required to notify the Executive Officer

7-25

each time visible vapors are detected. A record of such detections will be maintained on site in accordance with the rule. Additionally, SCAQMD is proposing video recordings of the OGI inspections. It is unclear how the video capture will contribute to rule compliance. WSPA recommends that this requirement be removed from the rule language.

7-25

For inspections required by subparagraph (f)(4), the proposed rule language requires that all visible vapors be reported to the Executive Officer within 8 hours of detection. As discussed in Comment 5, the presence of visible vapors is not necessarily indicative of a tank being out of compliance. A facility should not be required to notify the Executive Officer of the presence of visible vapors unless a tank is found to be non-compliant. Additionally, a facility is required to maintain records of visible vapors under Section (h)(2)(B), so there will be a record to refer back to as needed.

7-26

SCAQMD is requiring that records of leaks identified with an OGI device include a digital recording of the leak for a minimum of 5 seconds. It is unclear how this video capture will contribute to compliance. WSPA recommends this requirement be removed from the rule language.

7-27

WSPA recommends the proposed language be updated as follows:

(h) Reporting and Recordkeeping Requirements
(1) ...

(2) For OGI inspections required by subparagraph (f)(4), the owner or operator shall:

~~(A) Report all Visible Vapors to the Executive Officer by phone (1-800-CUTSMOG or 1-800-288-7664) within 8 hours of detection.~~

7-26
Cont.

(B) Keep records of Component Inspections, including tank identification, date of inspection and findings. Findings shall include identification of Storage Tanks from which Visible Vapors were identified, any determinations made pursuant to subparagraph (f)(4)(E), and corrective measures taken, if applicable.

(C) Keep records Visible Vapors detected during a Tank Farm Inspection, including tank identification, date of inspection, and findings. Findings shall include identification of tanks from which Visible Vapors were identified, any determinations made pursuant to subparagraph (f)(4)(E), and corrective measures taken, if applicable.

~~(D) Record all Visible Vapors from tanks for a minimum of 5 seconds. Digital recordings shall be accurately time-stamped and kept on-site for a minimum of 2 years to be made available to the Executive Officer upon request.~~

7-27
Cont.

9. PAR 1178(j), Exemptions

The District has not provided a technical basis for expanding the scope of Rule 1178 to tanks with a true vapor pressure less than or equal to 5 mm Hg, nor has the District assessed the impacts for such inclusion. These tanks should continue to be exempt

7-28

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from all rule requirements. Separately, tanks that are out of service should be exempt from the requirements of OGI inspections.

As discussed in Comment 2, the District has provided no technical basis for inclusion of tanks with a true vapor pressure less than or equal to 5 mm Hg in the rule, nor have they provided any analysis of the impact to the regulated community from this inclusion. Therefore, WSPA recommends that the rule language continue to exempt storage tanks with a true vapor pressure less than or equal to 5 mm Hg.

WSPA recommends the proposed language be updated as follows:

(j)(2) Storage Tanks that do not have a Potential For VOC Emissions of 6 tons per year or greater used in Oil Production and are storing Organic Liquid ~~with a True Vapor Pressure equal to or less than 5 mm Hg (0.1 psi) absolute under actual storage conditions~~ are exempt from the requirements of this rule, with the exception of the requirements specified in paragraphs (f)(4), (h)(1) and (h)(6), provided the owner or operator demonstrates that the Organic Liquid stored has a True Vapor Pressure of 5 mm Hg (0.1 psi) absolute or less under actual storage conditions semi-annually.

7-28

PAR 1178(j) should also include an exemption from OGI inspections for tanks that are out of service.

WSPA recommends the PAR1178 language be updated to include the following:

[New Section]

(j)(6) An owner or operator of a Fixed Roof Tank, an External Floating Roof Tank, an Internal Floating Roof Tank, and Domed External Floating Roof Tank shall be exempt from OGI inspections required by subparagraph (f)(4) if the subject tank is Out of Service.

7-29

WSPA appreciates the opportunity to provide these comments related to PAR 1178. As outlined above, there are multiple items requiring further analysis and thorough discussion prior to rule adoption. The District and stakeholders need more time to ensure the necessary changes are incorporated into the rule. The District should bifurcate the rule such that the language necessary to address the EPA disapproval of the California Air Resources Board (CARB) Oil and Gas Regulation is incorporated in a timely manner, while still allowing the necessary time for stakeholder comment, further analysis, and revisions as appropriate.

We look forward to continued discussion of this important rulemaking. If you have any questions, please contact me at (310) 808-2144 or via e-mail at psenecal@wspa.org.

Sincerely,



Western States Petroleum Association

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Cc: Wayne Nastri, SCAQMD
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Comment 7-1

Staff revised the cost-effectiveness for requiring doming and added costs for O&M. Details regarding the revised cost-effectiveness are contained in Chapter 4. See Comment 1-1.

Comment 7-2

Crude oil tanks proposed to be domed are either permitted at an RVP of 11 psia or are limited to an RVP of 11 psia per rule requirements. Staff determined that crude oil tanks proposed to be domed are subject to the same RVP requirements and are of the same class and category. The highest reported actual RVP of crude oil for tanks proposed to be domed is 8.14 psia. A review of reported crude oil RVPs suggests that RVP varies and has the potential to be as high as 8.14 psia. For cases where facilities consistently store low TVP crude oil, PAR 1178 allows facilities to take a permit condition limiting TVP of the crude oil stored to a maximum of 3 psia (~RVP 4.7 psia) in lieu of doming. Using the maximum reported RVP value to calculate emission reductions provides an estimate of potential emission reductions achieved by doming.

Comment 7-3

The rule development schedule was bifurcated to allow additional time for stakeholders to work with staff on proposed requirements.

Comment 7-4

Staff stated in Working Group Meeting #5 that U.S. EPA identified deficiencies in Rules 463 and 1178 and that staff is working with U.S. EPA to address the deficiency. In Working Group Meeting #7, staff presented the proposed rule concepts that included how the RACT deficiency would be addressed. Staff released initial preliminary draft rule language prior to the release of the Preliminary Draft Rule Language informing stakeholders of the rule language that addresses the RACT deficiency. Subsequently, staff presented PARs 463 and 1178 in the Public Workshop.

Comment 7-5

Staff released initial preliminary draft rule language to allow stakeholders to comment prior to the release of the Preliminary Draft rule Language. As a result, staff received several comments after the release of the initial preliminary draft rule language and revised the rule language based on stakeholder comments. Staff also received information requested from facilities and updated the rule language based on the information received. The intent of updating rule language prior to the release of the Preliminary Draft Rule Language was to allow facilities time to review and comment so that stakeholder input can be considered for the Public Workshop. Staff also held meetings with participating facilities to discuss the initial drafts of the rule language to consider their input for the Public Workshop. Additionally, the rule development schedule was bifurcated to address the U.S. EPA identified deficiency in a timely manner while allowing additional time for stakeholders to work with staff on proposed requirements.

Comment 7-6

Over several months, staff worked with stakeholders to obtain cost information regarding controls. Cost-effectiveness for doming has been revised to include O&M costs. Refer to Chapter 4 for details. See response to Comment 1-1.

Comment 7-7

Rules 463 and 1178 were amended on May 5, 2023 to apply to tanks subject to the U.S. EPA's 2016 CTG, in addition to the existing applicability. The amended applicability does not include tanks that are not subject to U.S. EPA's 2016 CTG.

Comment 7-8

Incremental cost-effectiveness was conducted in accordance with the Health and Safety Code and is detailed in Chapter 4 of this report.

Comment 7-9

See response to Comment 2-12.

Comment 7-10

Refer to response to Comment 2-13 for the requested incremental cost-effectiveness results.

Comment 7-11

PAR 1178 was revised to exempt tanks used to store organic liquid with TVP of 0.1 psia and less from rule requirements if demonstrations are made on a semi-annual basis that the TVP of the organic liquid stored is 0.1 psia or less. Staff determined this requirement is necessary to confirm qualification for exemption from rule requirements and proposes to retain the removal of the TVP applicability threshold.

Comment 7-12

Paragraph (c)(8) was revised to reflect reporting periods required by the Annual Emission Reporting program specific to reporting years.

Comment 7-13

Paragraph (j)(6) was added to include an exemption from OGI inspections for tanks that have been emptied or opened to the atmosphere pursuant to the requirements of Rule 1149. See response to Comment 4-5.

Comment 7-14

Staff conducted a BARCT analysis on more stringent gap requirements and 98 percent emission control system efficiency, that includes an analysis of technical feasibility and cost-effectiveness. Refer to Chapter 2 for discussion detailing the BARCT assessment for the proposed requirements. See response to Comment 2-9 for discussion on emission reduction calculations.

Comment 7-15

See response to Comment 7-14.

Comment 7-16

Staff used a statistical significance approach to determine the likelihood of an outcome. Staff analyzed a sample size of 10 percent that statistically provides 95 percent certainty of an outcome for the entire population (tanks) analyzed. Refer to the BARCT assessment for Seal Requirements in Chapter 2 and the response to Comment 2-8 regarding cost-effectiveness for requiring more stringent gap requirements.

Comment 7-17

See response to Comment 2-9.

Comment 7-18

Refer to BARCT assessment in Chapter 2 for emission control systems. Staff relied on the information available as well as information provided by facilities during site visits to determine the capabilities of currently operating emission control system. Staff has encouraged stakeholders to provide information regarding the equipment under review and has not received information or supporting documentation regarding the performance of existing emission control systems. Currently, Rule 1178 requires facilities to conduct an annual performance test for emission control systems to demonstrate compliance with current requirements. Staff has informed WSPA that any performance tests that suggest the inability or difficulty to meet the proposed requirement should be provided to staff for reconsideration of the BARCT analysis conclusion for emission control systems. As of yet, staff has not received supporting information for existing emission control system inability to meet the proposed requirements.

Comment 7-19

See response to Comment 2-9.

Comment 7-20

PAR 1178 allows visible vapors from tanks during certain OGI inspections that are accepted as normal operations such as those that may be detected from rim seal systems during component inspections. PAR 1178 has been revised to allow visible vapors from components that staff has concluded are unavoidable given the current controls available and required for tanks. The proposed allowances for visible vapors should not result in any facility needing to demonstrate compliance except when visible vapors indicate a potential defect.

Comment 7-21

PAR 1178 has been revised to require tank farm inspections at least once every calendar week.

Comment 7-22

PAR 1178 has been revised to allow 3 days to demonstrate compliance with the requirements of subdivision (d). The methodology for demonstrating compliance with the requirements of subdivision (d) is stated in the requirements of subdivision (d) and include methods for determining a vapor tight condition and compliance with gap requirements.

Comment 7-23

PAR 1178 has been revised to allow for additional inspection to be conducted prior to demonstrating compliance with rule requirements when visible vapors are detected. The additional inspection allows facilities to determine if there is a defect or a potential defect without entering the tank. If a potential defect is observed, such as vapors emitted from vapor tight components or vapors observed from a visually defective rim seal or other component, a facility would then be required to demonstrate compliance with applicable rule requirements or make any necessary repairs.

Comment 7-24

Subdivision (g) was revised to allow 3 days for a repair for defects identified during OGI inspections. Staff will not make any current requirements in Rule 1178 less stringent, when the making a requirement less stringent can potentially result in an emission increase. Staff does not propose to extend the repair timeline and allow 3 days to make a repair for defects identified during existing inspection procedures.

Comment 7-25 and 7-26

See response to Comment 2-5.

Comment 7-25 and 7-27

PAR 1178 will require digital recordings of leaks identified during tank farm inspections to provide compliance staff information about the leak. Since leaks identified during an OGI inspection are not measured, a digital recording provides information about the size of the leak.

Comment 7-28

PAR 1178 has been revised to include in the applicability tanks storing organic liquid with TVP of 0.1 psia or less so that those tanks can be subject to TVP testing requirements to confirm qualification for exemption from rule requirements. PAR 1178 has been revised to exempt tanks storing organic liquid with TVP of 0.1 psia or less from all rule requirements except for TVP testing and recordkeeping. (Paragraph (j)(2))

Comment 7-29

PAR 1178 has been revised to contain an exemption from OGI inspections when the tank is out of service. (Paragraph (j)(6)). See response to Comment 4-5.

8. Regulatory Flexibility Group (Latham & Watkins), Received June 28, 2023

<p>LATHAM & WATKINS LLP</p> <p>June 26, 2023</p> <p>Michael Morris, Planning and Rules Manager Planning, Rule Development and Implementation South Coast Air Quality Management District 21865 Copley Drive Diamond Bar, CA 91765</p>	<p>355 South Grand Avenue, Suite 100 Los Angeles, California 90071-1560 Tel: +1.213.485.1234 Fax: +1.213.891.8763 www.lw.com</p> <p>FIRM / AFFILIATE OFFICES</p> <table border="0"> <tr><td>Austin</td><td>Milan</td></tr> <tr><td>Beijing</td><td>Munich</td></tr> <tr><td>Boston</td><td>New York</td></tr> <tr><td>Brussels</td><td>Orange County</td></tr> <tr><td>Century City</td><td>Paris</td></tr> <tr><td>Chicago</td><td>Riyadh</td></tr> <tr><td>Dubai</td><td>San Diego</td></tr> <tr><td>Düsseldorf</td><td>San Francisco</td></tr> <tr><td>Frankfurt</td><td>Seoul</td></tr> <tr><td>Hamburg</td><td>Shanghai</td></tr> <tr><td>Hong Kong</td><td>Silicon Valley</td></tr> <tr><td>Houston</td><td>Singapore</td></tr> <tr><td>London</td><td>Tel Aviv</td></tr> <tr><td>Los Angeles</td><td>Tokyo</td></tr> <tr><td>Madrid</td><td>Washington, D.C.</td></tr> </table>	Austin	Milan	Beijing	Munich	Boston	New York	Brussels	Orange County	Century City	Paris	Chicago	Riyadh	Dubai	San Diego	Düsseldorf	San Francisco	Frankfurt	Seoul	Hamburg	Shanghai	Hong Kong	Silicon Valley	Houston	Singapore	London	Tel Aviv	Los Angeles	Tokyo	Madrid	Washington, D.C.
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Madrid	Washington, D.C.																														

Re: Regulatory Flexibility Group Comments on Proposed Amended Rule ("PAR") 1178

Dear Mr. Morris:

Thank you for the opportunity to provide comments regarding Proposed Amended Rule 1178 ("PAR 1178"). We appreciate the South Coast Air Quality Management District (the "District") decision to bifurcate the rulemaking and its continued commitment to work with stakeholders on the further development of PAR 1178. We submit these comments on behalf of the Regulatory Flexibility Group ("RFG"), a coalition of Southern California businesses in the aerospace, automotive, energy and petrochemical sectors. The RFG is committed to supporting strategies for achieving state and national air quality standards that are cost-effective and fairly allocated among all sectors of the Southern California economy.

As set forth in this letter, we appreciate the dialogue and revisions reflected in the most recent rule language, but believe certain modest modifications to the current language of the PAR remain necessary. Further, to ensure a fully informed rulemaking, we also respectfully request the District to undertake the appropriate environmental, socioeconomic, and cost-effectiveness analysis in advance of bringing PAR 1178 to the Governing Board.

Proposed Amendments to PAR 1178

In Initial Draft Rule Language released June 13, 2023, District Staff proposes amendments to Rule 1178 based on a best available retrofit control technology ("BARCT") assessment.¹ Proposed amendments include requirements that storage tanks at petroleum facilities install domed roofs and use optical gas imagining ("OGI") devices for leak detection, as well as additional recordkeeping and reporting requirements.² We understand that, as soon as September 2023, District Staff intends to bring to the Governing Board proposed amendments. We appreciate that the District has continued to incorporate feedback from regulated entities in recent updates to PAR

¹ SCAQMD Draft Staff Report, Proposed Amended Rules 463 and 1178 (April 2023) at 3.
² *Id.*

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1178 language. Specifically, we note the District has recognized that tanks storing organic liquids with a true vapor pressure equal to or less than 5 mm Hg (0.1 psi) and tanks that are out of service are not sources of significant VOC emissions and should remain exempt from the requirements of the rule. While we do appreciate these revisions, we respectfully request that District Staff make the modifications proposed herein to minimize economic and socioeconomic disruption while the regulated community and the District work towards shared air quality goals.

Flexibility in the Dome Installation Compliance Schedule

In the Initial Draft Rule Language, the District proposes to require that the “owner or operator of an External Floating Roof Tank shall install a Domed Roof on any External Floating Roof Tank used to store material with a True Vapor Pressure of 3 psia or greater”³ on the following timeline:

The owner or operator shall install a Domed Roof on any Storage Tanks under common ownership permitted to contain more than 97% by volume crude oil that become subject to the doming requirements of subparagraph (d)(1)(E) upon [Date of Adoption], in accordance with the following schedule:

- (i) No later than December 31, 2031, for at least 1/3 of the applicable Storage Tanks; and
- (ii) No later than December 31, 2033, for at least 1/2 of the applicable Storage Tanks; and
- (iii) No later than December 31, 2038, for all of the applicable Storage Tanks.⁴

8-1

Removing a storage tank from service in order to install a domed roof, or indeed for any reason, carries a risk of supply disruptions. The rigid timeline proposed by the District may require that some facilities take multiple tanks offline at the same time to comply with the doming requirement. Having multiple tanks offline simultaneously would exacerbate supply disruption and could fuel market speculation.

External factors (e.g., labor shortages, supply chain disruptions, etc.) could impact the ability to adhere perfectly to the proposed schedule. To address this risk, we propose to add new language to paragraph (d)(5)(B) and a new paragraph (d)(5)(E), shown below with accompanying definitions, providing for extensions to the compliance deadlines when a facility offers evidence satisfactory to the Executive Officer that the facility is unable to comply with the deadline, despite the facility’s best efforts to do so. The proposed revisions would also provide that facilities with 10 or greater tanks could submit an optional, alternative “Doming Schedule” with specific requirements as an alternative to the schedule set forth in (d)(5)(B). These proposed safeguards

³ SCAQMD PAR 1178 Initial Draft Rule Language (d)(1)(E) (released June 13, 2023).

⁴ *Id.* at paragraph (d)(5)(B).

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reduce the likelihood of unintended supply disruptions or market speculation due to multiple tanks going out of service at the same time.

Proposed Rule Language

New definitions:

BEST EFFORTS means the efforts that a petroleum facility desirous of achieving an identified doming schedule would use under reasonably foreseeable circumstances to facilitate such result.

DOMING SCHEDULE means an optional doming schedule for an owner or operator of a facility with ten or more tanks subject to this rule.

OUT OF SERVICE means a tank that has been or is in the process of being drained, degassed and cleaned pursuant to Rule 1149 and/or other regulatory requirements.

For addition to paragraph (d)(5)(B):

Upon demonstration that, despite Best Efforts, a Facility would be required to take more than one Storage Tank under common ownership Out of Service simultaneously in order to meet the deadlines specified in paragraphs (d)(5)(B)(i)-(iii), the Executive Office shall grant an extension to the specified deadline for the minimum duration necessary to avoid more than one Storage Tank being Out of Service simultaneously.

8-1

New paragraph (d)(5)(E):

As an alternative to complying with the schedule specified in paragraph (d)(5)(B), a Facility with ten or more Storage Tanks subject to the requirements of (d)(1)(E) may elect to implement a Doming Schedule. The Doming Schedule shall be submitted to the Executive Office for approval. The Doming Schedule must specify:

- (i) The Storage Tanks at the Facility subject to the rule and the proposed timing for the doming of each;
- (ii) The Best Efforts the Facility will undertake to install domes on the identified Storage Tanks consistent with the schedule proposed in the Doming Schedule, with due consideration for avoidance of multiple Storage Tanks being Out of Service simultaneously;
- (iii) The anticipated mass emissions reductions and timing of the same associated with the Doming Schedule.

A Facility electing to implement a Doming Schedule shall provide an annual update on progress and mass emissions reductions to the Executive Officer within 60 days after the end of each Emission Inventory Year.

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CEQA Analysis

The proposed amendments to Rule 1178 stem from Control Measure FUG-01, which is included in both the 2016 Air Quality Management Plan (“AQMP”) and the 2022 AQMP and analyzed under the Program Environmental Impact Report (“PEIR”) for each.⁵ The District has stated that “the impacts of implementing this control measure [have] been evaluated in the Program EIR” for the 2022 AQMP.⁶ As you know, the scope of the proposed amendments has changed meaningfully from the project description of Control Measure FUG-01 contained and analyzed in the PEIRs — from only leak detection and repair with optical gas imaging to requiring domed roof installation on external floating roof tanks.⁷

We recognize that the CEQA analysis did evolve slightly from the 2016 AQMP PEIR, which concluded FUG-01 would have no expected significant impacts,⁸ to the 2022 AQMP PEIR, which concluded FUG-01 may cause air quality and greenhouse gas impacts due to construction.⁹ But notably, it appears the 2022 AQMP PEIR only evaluated FUG-01 to include implementation of advanced leak detection technologies and the associated minor construction, without any mention of doming requirements.¹⁰

8-2

Dome installation will require substantial construction activities for the 54 tanks that would be subject to the doming requirements of PAR 1178, as the tanks are all larger than 90 feet in diameter and can be as large as 260 feet.¹¹ Such construction activities should be analyzed prior to rule adoption, and we therefore encourage the District to undertake additional environmental analysis of PAR 1178 to ensure compliance with CEQA.

⁵ See SCAQMD Final Program Environmental Impact Report, 2016 Air Quality Management Plan (Jan. 2017) at 2-22 [*hereinafter*, 2016 AQMP PEIR]; and SCAQMD, Final Program Environmental Impact Report for Proposed 2022 Air Quality Management Plan (Nov. 2022) at 2-20 [*hereinafter*, 2022 AQMP PEIR].

⁶ 2022 AQMP PEIR at C-108.

⁷ See 2022 AQMP PEIR at 2-20 (“FUG-01: Improved Leak Detection and Repair: This proposed control measure seeks to reduce emissions of VOCs from fugitive leaks from process and storage equipment located at a variety of sources including, but not limited to, oil and gas production, petroleum refining, chemical products processing, storage and transfer, marine terminals, and other. Some of these facilities are subject to leak detection and repair (LDAR) requirements established by the South Coast AQMD and the U.S. EPA that include periodic VOC concentration measurements using an approved portable organic vapor analyzer (OVA) to identify leaks. This measure would implement the use of advanced leak detection technologies including optical gas imaging devices (OGI), open path detection devices, and gas sensors for earlier detection of VOC emissions from leaks.”)

⁸ 2016 AQMP PEIR at 4.0-3, Table 4.0-1.

⁹ See 2022 AQMP PEIR at A-7.

¹⁰ See 2022 AQMP PEIR at A-7. The District also evaluated Control Measure MCS-01, Application of All Feasible Control Measures, which involves updating BARCT in any rule when feasible. See *Id.* at 2-21 to 2-22. However, the analysis of that control measure, which arguably may be applicable to PAR 1178 doming requirements, is limited to the effects of associated construction.

¹¹ See SCAQMD Preliminary Draft Staff Report, Proposed Amended Rules 1178 and 463 (February 2023) at p. 2-4 [*hereinafter*, “PAR 1178 Preliminary Draft Staff Report”].

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Further, the 2022 AQMP PEIR determined that “no significant aesthetic impacts are expected due to the implementation of the 2022 AQMP,”¹² in contrast to the PEIR prepared for the 2016 AQMP. The 2016 AQMP PEIR found that significant aesthetic impacts could result from control measures which could generate “glare impacts due to the solar reflectance from the use of cool roof technology”, and “[c]hange in visual character due to the use of bonnets on top of marine vessel stacks.”¹³ The domed roofs required by PAR 1178, which are often constructed of aluminum or other reflective alloys, may have similar solar reflectance and glare impacts compared to the “cool roof technology” analyzed in the 2016 AQMP PEIR. Further, installation of domed roofs on large storage tanks could change the visual character of the landscape in a similar way to bonnets placed on top of marine vessel stacks, particularly for tanks located near coastal sightlines. Accordingly, we encourage the District to analyze the potential aesthetic impacts of PAR 1178’s doming requirements in connection with this rulemaking.

8-3

Socioeconomic Impact Assessment

We appreciate that District Staff has indicated it intends to prepare a socioeconomic impact assessment prior to bringing PAR 1178 before the Governing Board.¹⁴ To meet the requirements of the Health & Safety Code, the assessment must, among other things, address “[t]he impact of the rule or regulation on employment and the economy in the south coast basin . . . [t]he range of probable costs, including costs to industry, of the rule or regulation . . . [and t]he availability and cost-effectiveness of alternatives to the rule or regulation.”¹⁵ In order to ensure a robust analysis, we note that the socioeconomic impact assessment should include, in addition to the costs on the individual facilities, considerations of supply chain disruptions, price spikes, and the potential effects of market speculation that may occur as facilities move tanks offline to comply with doming requirements. This analysis is particularly important given the new rule will require facilities to take tanks in crude oil service offline. The removal of these tanks from service naturally raises supply disruption concerns, and this should be fully analyzed in the context of the socioeconomic analysis.

8-4

Cost-Effectiveness Analysis

We also appreciate that Staff has continued to update its cost-effectiveness analysis throughout the rulemaking process. We trust that an updated analysis will consider the true costs of domed roof installation, as detailed further in our January 4, 2023 letter.¹⁶ Evaluating all costs are integral to a meaningful cost-effectiveness analysis. Finally, regarding the cost-effectiveness threshold, Staff indicated that it will utilize the consumer price index to inflate that threshold

8-5

8-6

¹² 2022 AQMP PEIR at 4.8-2.

¹³ 2016 AQMP PEIR at 4.8-2, Table 4.8-1.

¹⁴ See PAR 1178 Preliminary Draft Staff Report (February 2023) at 4-10.

¹⁵ Health & Safety Code § 40440.8.

¹⁶ See Letter from John C. Heintz, Latham & Watkins on behalf of RFG, to Michael Morris, SCAQMD (January 4, 2023) at p. 3 (discussing costs of dome installation, lost productivity, and the actual anticipated lifecycle of domes). We have attached this letter for your convenience as Attachment A.

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annually.¹⁷ We note that, to the extent that an inflated threshold is used in PAR 1178 rulemaking, inflated labor and material costs must also be used in an updated cost-effectiveness analysis.] 8-6

Conclusion

We greatly appreciate the opportunity to provide these comments on PAR 1178, and we are especially thankful that the District has recognized the need for further analysis of the proposed amendments by bifurcating the rulemaking. We would also appreciate a meeting to discuss the amendments we propose to address the remaining requests expressed in this letter. Please contact me at (213) 891-7395, or by email at john.heintz@lw.com with your availability to schedule a discussion.

Best regards,



John C. Heintz
of LATHAM & WATKINS LLP

Cc: Michael Krause, SCAQMD
RFG Members
Chris Norton, Latham & Watkins LLP
Nick Cox, Latham & Watkins LLP

¹⁷ PAR 1178 Preliminary Draft Staff Report, Appendix A: Response to Public Comments at Comment 2-4.

LATHAM & WATKINS LLP

January 4, 2023

Michael Morris, Planning and Rules Manager
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Re: Regulatory Flexibility Group Comments on Proposed Amended Rule ("PAR") 1178

Dear Mr. Morris,

Thank you for the opportunity to provide comments regarding Proposed Amended Rule 1178 ("PAR 1178"). We submit these comments on behalf of the Regulatory Flexibility Group ("RFG"), a coalition of Southern California businesses in the aerospace, automotive, energy and petrochemical sectors. The RFG is committed to supporting strategies for achieving state and national air quality standards that are cost-effective and fairly allocated among all sectors of the Southern California economy.

We appreciate the number of Working Group meetings the South Coast Air Quality Management District ("District") has held on PAR 1178. We are, however, concerned with the current cost-effectiveness analysis. The District's analysis and methodology to date raise a number of issues that cut across sectors and industries as the District moves forward with future rulemakings, particularly in light of the Governing Board's recent adoption of the 2022 Air Quality Management Plan ("AQMP") and its reliance on "extensive use of zero emission technologies across all stationary and mobile sources."¹ Accordingly, and as summarized in more detail below, we respectfully request the District fully consider the costs of the proposed rule and anticipated equipment life-cycle when establishing a cost-effectiveness threshold, and that the District undertake a tiered cost-effectiveness, incremental cost-effectiveness, and socioeconomic analysis prior to bringing the rule forward for a public hearing², as required by the AQMP.

¹ South Coast Air Quality Management District, 2022 Air Quality Management Plan, at Preamble to Executive Summary.

² Currently scheduled for April 2023. See South Coast Air Quality Management District, Presentation for Working Group Meeting 7 ("WGM 7 Presentation"), at 28 (presentation posted December 30, 2022).

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The District Should Consider Additional Information to Ensure an Accurate Cost-Effectiveness Analysis

The Health & Safety Code requires the District to adopt rules which, among other things, “are efficient and cost-effective” (Health & Safety Code § 40440(c).) The Code states that:

In adopting any regulation, the district shall consider, pursuant to Section 40922 [cost-effectiveness assessment], and make available to the public, its findings related to the cost-effectiveness of a control measure. . . . A district shall make reasonable efforts, to the extent feasible within existing budget constraints, to make specific reference to the direct costs expected to be incurred by regulated parties, including businesses and individuals.

(Health & Safety Code § 40703.)

Health & Safety Code Section 40440.8 requires the District to examine “[t]he availability and cost-effectiveness of alternatives to the rule or regulation” by considering the socioeconomic impacts of proposed rules and regulations.

Further, Health & Safety Code Section 40920.6 requires the District to, among other things:

- 1) Review the information developed to assess the cost-effectiveness of the potential control option. For purposes of this paragraph, “cost-effectiveness” means the cost, in dollars, of the potential control option divided by emission reduction potential, in tons, of the potential control option.
- 2) Calculate the incremental cost-effectiveness for the potential control options To determine the incremental cost-effectiveness under this paragraph, the district shall 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.
- 3) [And consider t]he effectiveness of the proposed control option, . . . [t]he cost-effectiveness of each potential control option, . . . [and t]he incremental cost-effectiveness between the potential control options.

(Health & Safety Code § 40920.6.)

The requirements that the District create rules that are efficient and cost-effective and provide socioeconomic impact assessments reflect the legislature’s intent: that the District consider and seek to minimize socioeconomic impacts and have these considerations as objectives of its rulemaking authority.

However, at this point in the PAR 1178 process, the District has not fully taken into account the significant costs this rule will impose on the regulated community. Specifically, we respectfully request the District further consider the following:

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- ***True Dome Installation Costs.*** When considering labor costs (particularly union labor), necessary tank cleaning and degassing prior to doming, required modifications to fire suppression systems, water treatment and disposal associated with the work and installation costs are significantly higher than the doming costs assumed by the District.
- ***Lost Productivity Costs.*** The contemplated doming could require refiners to take tanks offline for potentially months at time. This would result in productivity losses that could be orders of magnitude greater than the District's applied lost productivity number (0.50/barrel to tanks with diameters greater than 200 ft.) in the October 2022 Working Group Meeting presentation.³
- ***The Useful Life Expectation Must Consider Actual Anticipated Lifecycle of the Equipment.*** The District assumes, based on vendor and facility estimates, that the domes will have a 50-year life. However, this fails to recognize that state, regional, and local policies, rules and regulations will likely reduce the consumption of certain fuels produced by Basin refineries, and, accordingly, the likelihood that the domes required pursuant to this rule will actually be in place 50 years from now. Use of a 50-year assumption makes the control equipment appear more cost-effective by diluting the significant capital costs of required projects over a much longer time table than is likely to occur. The staff analysis should reflect a 25-year assumption, which is more consistent with the anticipated use of the domes. Considering actual anticipated life-cycle is also consistent with broader District commitments to consider equipment life on a case-by-case basis, attempt to avoid stranded assets, and in cases of stranded assets, include equipment replacement costs and salvage values in the analysis.⁴

The cost-effectiveness analysis called for throughout the Health & Safety Code is a critical element of the rulemaking process. The analysis is only as good as the assumptions made and the cost data used; use of incomplete and/or inaccurate data renders the entire process meaningless. While we appreciate that the rulemaking process has been underway for some time, it is clear that additional data is needed to support an appropriate cost-effectiveness determination.

And while we recognize the District has endeavored to consider some of the factors summarized above (and we appreciate the same), to date the analysis has not undergone the rigor necessary obtain meaningful cost-effectiveness numbers. We refer you to RFG member letters for additional detail on the anticipated costs of this rulemaking, and encourage you to work closely with the regulated community to get a more comprehensive understanding of the potential impacts of the rule.

³ South Coast Air Quality Management District, Working Group Meeting 6, at 28 n.2 (Oct. 27, 2022).

⁴ We acknowledge Staff's indication it is open to considering permit conditions to remove tanks from service upon a future date in lieu of doming. See WGM 7 Presentation, at 5. However, RFG still believes the Health & Safety Code-driven cost-effectiveness analysis must consider the anticipated use timeline of the domes, not just the technical "useful life."

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Page 4

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The AQMP Requires the District to Engage in a “Tiered” Cost-Effectiveness, Incremental Cost-Effectiveness, and Socioeconomic Impact Analysis

As you know, proposed amendments to Rule 1178 stem from 2016 AQMP Control Measure FUG-01.⁵ The 2016 AQMP established cost-effectiveness thresholds for “tiered levels of analysis.” More specifically, the 2016 AQMP provides that the :

*2016 AQMP proposes **thresholds of \$30,000 per ton of VOC and \$50,000 per ton of NOx** for tiered levels of analysis. Note, however, with the new focus on incentives and public funding, not all of this cost will necessarily be borne by industry. Specifically, proposed rules with an average cost-effectiveness above these thresholds will trigger a more rigorous average cost-effectiveness, incremental cost-effectiveness, and socioeconomic impact analysis. A public review and decision-making process will be instituted to seek lower, more cost-effective alternatives. In addition, the SCAQMD staff, with input from stakeholders, will attempt to develop viable control alternatives within the industry source categories that a rule is intended to regulate. If it is determined that control alternatives within the industry source category are not feasible, staff will perform an evaluation of the control measure as described in the next paragraph. Viable alternatives will be reviewed by the SCAQMD Governing Board at a public meeting no less than 90 days prior to rule adoption and direction can be given to staff for further analysis. During this review process, incremental cost-effectiveness scenarios and methodology will be specified, and industry-specific affordability issues will be identified as well as possible alternative control measures.⁶*

The tiered analysis supports rigorous and careful consideration of the balance between air quality improvements and the economic concerns and impacts on the regulated community. As summarized above, we believe the current cost-effectiveness analysis vastly underestimates the actual costs. Notwithstanding, even the District’s revised \$32,400 per ton cost⁷ exceeds the 2016 AQMP’s established threshold for tiered review. Accordingly, we respectfully request the District undertake the more rigorous average cost-effectiveness, incremental cost-effectiveness, and socioeconomic impact analysis in connection with this rulemaking.

⁵ See South Coast Air Quality Management District, 2016 Air Quality Management Plan at 4-21.

⁶ *Id.* at 4-54 (emphasis added).

⁷ See South Coast Air Quality Management District, Presentation for Working Group Meeting 7, at 27 (presentation posted December 30, 2022).

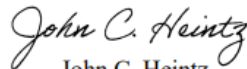
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Conclusion

Thank you for considering these comments. We will reach out separately to you in order to request a meeting with District staff to discuss these comments in greater detail as the rulemaking advances.

Sincerely,



John C. Heintz
of LATHAM & WATKINS LLP

cc: Michael Krause, Assistant Deputy Executive Officer, SCAQMD
Michael Carroll
RFG Members

Comment 8-1

Staff appreciates the suggested rule language to allow for additional time for doming if required to avoid potentially removing more than one tank from service at a time. Staff received API schedules from facilities with tanks proposed be domed. API schedules indicated that, for some facilities, more than one tank is removed from service at a time to accommodate API internal inspections. Only one facility has expressed concerns about removing more than one tank from service at a time. Staff added an alternative compliance schedule to accommodate the needs of this facility as the doming schedule of subparagraph (d)(5)(B) would potentially negatively impact the fuels market.

Comment 8-2

Neither the 2016 AQMP nor the 2022 AQMP identified doming as a potential option for implementing Control Measure FUG-01 and thus, the CEQA analyses conducted in the Final Program Environmental Impact Reports (EIRs) for both the 2016 AQMP and the 2022 AQMP did not examine the potential environmental impacts associated with doming activities. However, for PAR 1178, an Environmental Assessment (EA) with less than significant impacts for all environmental topic areas was prepared which analyzed the potential environmental impacts from construction activities from installing domes on existing storage tanks. The Draft EA for PAR 1178 has been released for a 30-day public comment and review period from July 19, 2023 to August 18, 2023 and is available here: <http://www.aqmd.gov/docs/default-source/ceqa/documents/aqmd-projects/2023/final-environmental-assessment-for-proposed-amended-rule-1178.pdf>.

Comment 8-3

As mentioned in response to Comment 8-2, a Draft EA for PAR 1178 analyzed the environmental impacts associated with doming activities for all environmental topic areas, including the topic of aesthetics. The aesthetics analysis concluded less than significant impacts associated with doming relative to scenic vistas and resources, visual character and public views and surrounding, and light and glare (see pp. 2-6 to 2-10). The Draft EA for PAR 1178 is available here: <http://www.aqmd.gov/docs/default-source/ceqa/documents/aqmd-projects/2023/final-environmental-assessment-for-proposed-amended-rule-1178.pdf>.

Comment 8-4

In conjunction with the staff report, the Draft Socioeconomic Impact Assessment (SIA) for PAR 1178 has been prepared pursuant to the requirements of California Health and Safety Code (H&SC) Sections 40440.8 and 40728.5 which require a socioeconomic impact assessment be performed for any proposed rule, rule amendment, or rule repeal which "will significantly affect air quality or emissions limitations." The scope of the Draft SIA includes a discussion of the type of affected industries, including small businesses; impact on employment and the regional economy; a range of probable costs, including those to industry; availability and cost-effectiveness of alternatives to the rule; emission reduction potential; and the necessity of adopting, amending, or repealing the rule in order to attain state and federal ambient air quality standards.

In conjunction with the staff report, the Draft SIA also satisfies the requirements of H&SC Section 40920.6, which requires incremental cost-effectiveness be performed for a proposed rule or amendment which imposes Best Available Retrofit Control Technology or "all feasible measures" requirements relating to ozone, CO, SO_x, NO_x, VOCs, and their precursors.

In relation to the potential impacts mentioned in the comment, the Draft SIA assesses the possibility of supply chain impacts to the petroleum refinery and petroleum bulk storage terminal industries based on historical evidence and includes an assessment of the potential tank downtime required for PAR 1178 compliance. The Draft SIA also assesses potential effects of PAR 1178 on gasoline prices in the region. The Draft SIA concludes that any potential impacts as listed above are expected to be minimal. For details, please refer to the Draft SIA for PAR 1178.


Comment 8-5


Costs considered for doming were based solely on costs provided by industry and based on actual and projected project costs, except for O&M costs. See response to Comment 1-1 regarding O&M costs. Facilities did not provide costs associated with actual O&M projects. See response to Comment 1-1 regarding O&M costs. Additionally, staff made conservative assumptions in the cost-effectiveness analysis including adding costs for fire suppressions systems for tanks located at facilities not required to use fire suppression systems and adding costs for cleaning and degassing for all tanks. Cleaning and degassing costs contribute to overall costs significantly. Facilities have stated that cleaning and degassing is conducted on a case-by-case basis and that all tanks will not require emptying prior to doming. Some facilities stated they would not empty their tanks prior doming and would idle the tanks while doming construction occurs. Staff has concluded that costs assumed for doming are conservative and that true cost of domed installation is less than or equal to what is assumed for the cost-effectiveness analysis.


Comment 8-6


Staff utilized costs from 2022-23 time period and is using the 2022 cost-effectiveness threshold. The threshold was not inflated for 2023.


9. Comment Letter from Earth Justice, et al., Received August 16, 2023














8/16/2023
 SCAQMD Governing Boardmembers
 By email


Re: Support Proposed Amended Rule 1178 with Strengthening to Reduce VOCs and Cancer-Causing Benzene

Dear Governing Boardmembers,

The undersigned Environmental Justice and Environmental organizations are writing to request your strong support for adoption with strengthening amendments of Proposed Amended Rule (PAR) 1178 (Storage Tanks at Petroleum Facilities), which is long overdue and sorely needed to reduce smog-forming volatile organic compounds (VOCs) and toxic emissions. The South Coast Air Basin is home to over a thousand storage tanks at petroleum facilities. Such tanks are a major source of VOC pollution. Moreover, direct measurements have shown that refinery storage tank VOCs are grossly underestimated in reporting to South Coast AQMD.

We applaud South Coast AQMD staff's work in proposing the following improvements under PAR 1178:

- **Adding domes to External Floating Roof crude oil tanks** (at right) to enclose emissions from: liquids coating open-air tank walls as the floating roof moves down (unloading), imperfect tank seals around the floating roof, and floating roof fittings. (Dome adds roof at top.)
- **Optical Gas Imaging (OGI)** using infrared cameras weekly, to detect leaks that are otherwise hard to predict, since *any* tank can leak to the air as they degrade over time.
- **Secondary seals and more stringent seal gap** requirements.
- **Increased vapor recovery system control efficiency of 98 percent** for fixed roof tanks.



VOC emission reductions are significant under PAR 1178 - estimated at almost 1 ton/day.¹ However, rule effectiveness is underestimated, since we know overall emissions are underestimated. Emissions estimation uses standard EPA TANKs factors, but a specialized study in the Basin found every oil refinery had greatly underestimated VOCs (6 times higher on average, even when part of the Torrance refinery was closed). Moreover, a Texas study found the same underestimation for storage tanks at oil refineries.²

There are still important weaknesses in PAR 1178 that need strengthening amendments:

¹ Staff Report, p. EX-1

² Published 11 April 2017, 2015, Emission Measurements of VOCs, NO2 and SO2 from the Refineries in the South Coast Air Basin Using Solar Occultation Flux and Other Optical Remote Sensing Methods, available [S_Coast Fluxsense](#), p. 5, 94, 95. (See [CBF decoder](#) explaining this technical report.) Also see similar [Texas Fluxsense study](#) .

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September 2023

- **Exemptions to avoid doming should be removed.** PAR 1178 allows refineries to take a lower permit limit for vapor pressure in lieu of doming. This is difficult to enforce, and methods are inaccurate (e.g., vapor pressure is not measured frequently,³ and other methods can introduce errors). 9-2
- **Timelines are far too long.** Most refiners are allowed until 2038 (15 years!) to dome crude oil tanks; one is allowed until 2041(18 years!). **Doming should be completed as expeditiously as possible but no later than 2035, unless refiners agree to decommission the tank.** 9-3
- **The original tanks rule adopted in 2001 had much more expeditious deadlines.** It required doming for many tanks, though it excepted crude oil tanks, and required completion by 2008 (with 1/3 domed within 3 years, 2/3rds in 5 years). **All doming was required to be completed within 7 years after adoption.**⁴ The updated rule is excessively generous due to an arbitrary cost effectiveness threshold and inflated implementation costs. The District already allowed the crude oil tanks to escape doming that should have been required in the original 2001 regulation, and in the new draft, would continue polluting long into the future. 9-4

Staff should also commit to reworking the cost effectiveness threshold for VOCs (similar to what they did with Nitrogen Oxides). The outdated and very low-cost threshold has been an obstacle to emission reduction measures, undermining the agency's mission. This threshold will be a problem for other upcoming rulemakings, including updates to regulations 1173 and 1176. 9-5

In addition to PAR 1178 itself, it is crucial that the District commit to repeat the Fluxsense study ever few years, to ensure that the new rule amendments are effective. This study was the *only* one which unearthed the underestimation of emissions compared to the District's inventory. Staff have told us they may be able to make such a commitment outside the regulation itself. **Therefore, we propose including a resolution alongside Rule adoption, committing to a repeat of the Fluxsense study every 3-5 years.** 9-6

We are providing additional comments to South Coast AQMD staff. Thank you for your consideration to clean up long-standing toxic and smog-forming oil refinery emissions!

Sincerely,

Alicia Rivera and Julia May, Communities for a Better Environment (CBE)
Oscar Espino-Padron and Byron Chan, Earthjustice
Chris Chavez, Coalition for Clean Air (CCA)
Jan Victor Andasan, East Yard Communities for Environmental Justice (EYCEJ)
Liz Jones, Center for Biological Diversity (CBD)
Jane Williams, California Communities Against Toxics (CCAT)
Jesse Marquez, Coalition for a Safe Environment (CFASE)

cc. Michael Krause, Michael Morris, Melissa Gamonig, Rodolfo Chacon

³ Staff agreed with our March 2023 letter regarding one error: "Staff agrees that TVP of crude oil stored can vary between testing periods and will rely on compliance staff's ability to conduct random TVP testing in between testing conducted by the facility to prevent potential circumvention of the TVP allowance." Staff Report p. A-25
⁴ Original regulation, adopted 2001, (d)(2)(A)(i-iii)

Comment 9-1

Emission reductions were calculated using Tank ESP PRO that is based on emissions estimate procedures from Chapter 7 of U.S. EPA's Compilation of Air Pollutant Emission Factors for VOC emissions from storage tanks. This software uses the most current calculation methodologies for determining the effectiveness of certain tank controls. Staff understands that emerging technologies may, in the future, provide more accurate emissions estimates. However, at this time, staff has not determined a better method available that can accurately and efficiently estimate emission reductions associated with the installation of specific controls on individual sources.

Comment 9-2

Staff is proposing an option for facilities to limit the TVP of crude oil stored that will result in approximately the same emission reductions that would result from doming. Facilities would be prohibited from storing crude oil TVP greater than 3 psia which is verified on a semi-annual basis. Additionally, the emission reductions from any facilities with tanks that will be permitted to limit the TVP of crude oil stored will be achieved much sooner, within one year from date of adoption, than the emission reductions from doming.

Comment 9-3

The doming implementation schedule is based on the cost-effectiveness threshold for VOC established in the 2022 Final AQMP. The alternative implementation schedule is proposed to allow adequate for certain facilities with several crude oil tanks subject to doming to complete doming projects without impacting the fuels market. Emptying and cleaning a tank is expensive and facilities periodically empty and clean tanks for inspections. The doming schedule aligns with the periodic inspection schedules and that allowed rules staff to remove cleaning and degassing costs from its cost-effectiveness analysis. With the removal of cleaning and degassing costs, staff was able to propose doming for all crude tanks consistent with the cost-effectiveness threshold guidelines set forth in the 2022 Final AQMP for rule development.

Comment 9-4

The tanks proposed to be domed in the 2001 adoption of Rule 1178 were not crude oil tanks. There are different implications associated with doming crude oil tanks. Crude oil tanks are much larger than the tanks subject to doming as part of the 2001 Rule 1178 adoption and potentially require a more extensive cleaning and degassing process compared to tanks storing other material. Additionally, facilities do not have the same flexibility to store crude oil in other tanks at the facility while some crude oil tanks undergo doming construction. Because of this, multiple crude oil tanks may need to be removed from service at a time to meet an expedited compliance schedule. Having multiple crude oil tanks removed from service may result in impacts to the fuels market. Staff has determined that, due to the complexity of removing crude oil tanks from service and the potential market impacts, the proposed implementation schedule is feasible and cost-effective for facilities while not providing unnecessary additional time to dome.

Comment 9-5

Staff works within the guidelines established by the Governing Board and performs a cost-effectiveness analysis to evaluate and compare proposed control measures during the rulemaking process. Committing to reworking the cost-effectiveness threshold for VOCs is outside the rulemaking scope of PAR 1178.

Comment 9-6

The Fluxsense study provided a snapshot of a moment in time where emissions from sources were quantified. Staff believes that the inclusion of monitoring using OGI technology into PAR 1178 provides a more frequent inspection tool that will assist operators and owners of regulated tanks to identify leaks and thus reduce overall emissions more quickly and efficiently. Committing to conducting a Fluxsense study every 3 – 5 years, as suggested by the commentor, is outside the rulemaking scope of PAR 1178.

ATTACHMENT H

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Final Environmental Assessment for Proposed Amended Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities

August 2023

South Coast AQMD Number: 07192023KN

State Clearinghouse Number: 2023070354

Executive Officer

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PREFACE

This document constitutes the Final Environmental Assessment (EA) for Proposed Amended Rule (PAR) 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities. The Draft EA was circulated for a 30-day public review and comment period from July 19, 2023 to August 18, 2023, and four comment letters were received during the comment period. The comments and responses relative to the Draft EA are included in Appendix D of this Final EA.

Subsequent to the release of the Draft EA for public review and comment, the following modifications were made to the proposed project: 1) edits were made to the rule language for clarity and rule reference accuracy; and 2) three facilities were added to the total number of facilities that will be subject to PAR 1178. Of the three additional facilities, two facilities would require the installation of additional seals on 16 of their existing internal floating roof tanks. The third facility has five existing storage tanks which are not subject to PAR 1178 because the total VOC emissions at the facility currently do not exceed 20 tons per year. However, this facility has previously approved permits to construct six new storage tanks (which are designed to be built with domes) and once construction is completed, the total VOC emissions are expected to exceed 20 tons per year which would mean that domes will need to be installed on the five existing storage tanks. As such, the CEQA analysis was updated accordingly.

For the topics of air quality and transportation, the original analysis in the Draft EA was conservative with multiple facilities potentially undergoing concurrent construction activities on the same day even though the extended implementation timeframes allowed by PAR 1178 would make such an overlap unlikely. For this reason, the conclusion of less than significant peak daily construction impacts to air quality and transportation did not change as a result of the modifications made to the PAR 1178 after the Draft EA was circulated for public review and comment. Modifications were also made to the total greenhouse gas (GHG) emission calculations, which are quantified on an annual basis, and energy impacts, both of which resulted in slightly increased, but less than significant impacts. For this reason, the conclusion of less than significant GHG and energy impacts also did not change as a result of the modifications made to the PAR 1178 after the Draft EA was circulated for public review and comment. Lastly, revisions to the proposed project in response to verbal or written comments during the rule development process were not found to create new, avoidable significant effects. To facilitate identification of the changes between the Draft EA and the Final EA, modifications to the document are included as underlined text and text removed from the document is indicated by ~~strikethrough text~~. To avoid confusion, minor formatting changes are not shown in underline or strikethrough mode.

South Coast AQMD staff has evaluated the modifications made to PAR 1178 after the release of the Draft EA for public review and comment and concluded that none of the revisions constitute significant new information, because: 1) no new significant environmental impacts would result from the proposed project; 2) there is no substantial increase in the severity of an environmental impact; 3) no other feasible project alternative or mitigation measure was identified that would clearly lessen the environmental impacts of the project and was considerably different from others previously analyzed, and 4) the Draft EA did not deprive the public from meaningful review and comment. In addition, revisions to PAR 1178 and the analysis in response to verbal or written comments during the rule development process would not create new, avoidable significant effects. As a result, these revisions do not require recirculation of the Draft EA pursuant to CEQA Guidelines Sections 15073.5 and 15088.5. Therefore, the Draft EA has been revised to include the aforementioned modifications such that it is now the Final EA.

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CHAPTER 1

PROJECT DESCRIPTION

Introduction

California Environmental Quality Act

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Project Description

INTRODUCTION

The California Legislature created the South Coast Air Quality Management District (South Coast AQMD) in 1977¹ as the agency responsible for developing and enforcing emission control rules and regulations in the South Coast Air Basin (Basin) and portions of the Salton Sea Air Basin and Mojave Desert Air Basin. By statute, the South Coast AQMD is required to adopt an air quality management plan (AQMP) demonstrating compliance with all federal and state ambient air quality standards for the areas under the jurisdiction of the South Coast AQMD.² Furthermore, the South Coast AQMD must adopt rules and regulations that carry out the AQMP.³ The AQMP is a regional blueprint for how the South Coast AQMD will achieve air quality standards and healthful air; it contains multiple goals promoting reductions of criteria air pollutants including volatile organic compounds (VOC). The 2022 AQMP included Control Measure FUG-01 – Improved Leak Detection and Repair (LDAR), which explores the potential for newer leak detection technologies to improve current LDAR requirements thereby reducing VOC emissions from fugitive leaks from process and storage equipment at a variety of sources including, but not limited to, oil and gas production, petroleum refining, storage and transfer, etc.⁴ Previously, the 2016 AQMP included Control Measure FUG-01 to utilize advanced remote sensing technologies to allow for faster identification and repair of leaks, and the 2012 AQMP included Control Measure FUG-03 – Further Reductions of Fugitive VOC Emissions, which identified the implementation of advanced leak detection technologies, including optical gas imaging (OGI), as a method to reduce the emissions impact from leaks.

In accordance with Assembly Bill (AB) 617, which was signed into state law in 2017, and the California Air Resources Board's (CARB) Community Air Protection Program which implements AB 617, the South Coast AQMD is required to take specific actions to reduce air pollution and toxic air contaminants from commercial and industrial sources to address the disproportionate impacts of air pollution in environmental justice communities. The Wilmington, Carson, and West Long Beach (WCWLB) community, which is qualified as a high priority area, identified in its Community Emission Reduction Plan (CERP) adopted on September 6, 2019, emissions from refineries as an air quality concern. In particular, Chapter 5b, Action 4 in the WCWLB CERP recommended initiating rule development to amend Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities. Recommendations for proposed amendments to consider included improving current LDAR requirements by incorporating advanced leak detection technologies and requiring additional controls.

Since its adoption on December 21, 2001, Rule 1178 has been applicable to any aboveground storage tank that meets the following criteria: is located at a petroleum facility that has emitted more than 20 tons of VOC in any reporting year starting with emission inventory year 2000; and 1) has a capacity equal to or greater than 75,000 liters (19,815 gallons), or 2) is used to store organic liquids with a true vapor pressure (TVP) greater than 0.1 pound per square inch absolute (psia). Potential methods for reducing VOC emissions from aboveground storage tanks subject to Rule 1178 have included converting roofs, installing emission control systems, covering roof openings, and installing best available rim seal systems.

¹ The Lewis-Presley Air Quality Management Act, 1976 Cal. Stats., ch. 324 (codified at Health and Safety Code Section 40400-40540).

² Health and Safety Code Section 40460(a).

³ Health and Safety Code Section 40440(a).

⁴ South Coast AQMD, Final 2022 Air Quality Management Plan, December 2022. <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>

As directed in the 2022 AQMP and WCWLB CERP, Proposed Amended Rule 1178 (PAR 1178) establishes more stringent leak detection and repair and control requirements, such as weekly optical gas inspections, and additional control requirements for installing domes (referred to as doming) and secondary seals. PAR 1178 applies to 1,093 ~~1,059~~ tanks located at 30 ~~27~~ facilities including refineries, bulk storage, loading, and oil production facilities. The proposed amendments will reduce VOC emissions from these sources by 0.82 ton per day and partially implement Control Measure FUG-01 of the 2022 AQMP.

Implementation of PAR 1178 is expected to result in less than significant increases of criteria air pollutants in the short-term due to construction impacts, and overall long-term decrease in VOC emissions through minimizing fugitive losses from storage tanks at petroleum facilities.

CALIFORNIA ENVIRONMENTAL QUALITY ACT

The California Environmental Quality Act (CEQA) is comprised of Public Resources Code Section 21000 *et seq.* and CEQA Guidelines which are codified at Title 14 California Code of Regulations, Section 15000 *et seq.* CEQA requires all potential adverse environmental impacts of proposed projects be evaluated and methods to reduce or avoid identified significant adverse environmental impacts of these projects be implemented, if feasible. [Public Resources Code Section 21061.1 and CEQA Guidelines Section 15364]. The purpose of the CEQA process is to inform decision makers, public agencies, and interested parties of potential adverse environmental impacts that could result from implementing a proposed project and to identify feasible mitigation measures or alternatives, when an impact is significant.

Public Resources Code Section 21080.5 allows public agencies with regulatory programs certified by the Secretary of the Resources agency to prepare a plan or other written documents in lieu of a Negative Declaration or Environmental Impact Report (EIR). The South Coast AQMD's regulatory program was certified on March 1, 1989. [CEQA Guidelines Section 15251(l)]. In addition, the South Coast AQMD adopted Rule 110 – Rule Adoption Procedures to Assure Protection and Enhancement of the Environment, which implements the South Coast AQMD's certified regulatory program. Under the certified regulatory program, the South Coast AQMD typically prepares an Environmental Assessment (EA) to evaluate the environmental impacts for rule projects proposed for adoption or amendment.

The proposed amendments to Rule 1178 are a discretionary action subject to South Coast AQMD Governing Board consideration that has the potential for resulting in changes to the environment, and therefore, is considered a “project” as defined by CEQA. [CEQA Guidelines Section 15378]. The lead agency is the “public agency that has the principal responsibility for carrying out or approving a project that may have a significant effect upon the environment.” [Public Resources Code Section 21067]. Since the South Coast AQMD Governing Board has the primary responsibility for approving and carrying out the entire project as a whole, the South Coast AQMD is the most appropriate public agency to act as CEQA lead agency for the proposed project. [CEQA Guidelines Section 15051(b)].

The proposed project would further reduce VOC emissions from storage tanks through establishing weekly optical gas inspections and additional control requirements for doming, emission control systems, and secondary seals. However, South Coast AQMD's review of the proposed project also shows that the activities that facility operators may undertake to comply with PAR 1178 may also create secondary adverse environmental impacts that would not result in significant impacts for any environmental topic area. Thus, the analysis of PAR 1178 indicates

that the type of CEQA document appropriate for the proposed project is an EA with no significant impacts. The EA is a substitute CEQA document, which the South Coast AQMD, as lead agency for the proposed project, prepared in lieu of a Negative Declaration with no significant impacts [CEQA Guidelines Section 15252], pursuant to the South Coast AQMD's Certified Regulatory Program [Public Resources Code Section 21080.5, CEQA Guidelines Section 15251(l); South Coast AQMD Rule 110].

The EA includes a project description in Chapter 1 and an Environmental Checklist in Chapter 2. The Environmental Checklist provides a standard tool to identify and evaluate a proposed project's adverse environmental impacts and the analysis concluded that no significant adverse impacts would be expected to occur if the proposed project is implemented. Because the proposed project would have no statewide, regional, or areawide significance, no CEQA scoping meeting is required to be held pursuant to Public Resources Code Section 21083.9(a)(2). Further, pursuant to CEQA Guidelines Section 15252, since no significant adverse impacts were identified, no alternatives or mitigation measures are required.

The Draft EA ~~is being~~was released for a 30-day public review and comment period from July 19, 2023 to August 18, 2023. ~~Any~~Four comment letters on the analysis presented in this Draft EA were received during the public comment period; the comment letters and the responses are~~will be responded to and~~ included in ~~an a~~Appendix D of the Final EA.

Subsequent to the release of the Draft EA for public review and comment, the following modifications were made to the proposed project: 1) edits were made to the rule language for clarity and rule reference accuracy; and 2) three facilities were added to the total number of facilities that will be subject to PAR 1178. Of the three additional facilities, two facilities would require the installation of additional seals on 16 of their existing internal floating roof tanks. The third facility has five existing storage tanks which are not subject to PAR 1178 because the total VOC emissions at the facility currently do not exceed 20 tons per year. However, this facility has previously approved permits to construct six new storage tanks (which are designed to be built with domes) and once construction is completed, the total VOC emissions are expected to exceed 20 tons per year which would mean that domes will need to be installed on the five existing storage tanks. As such, the CEQA analysis was updated accordingly.

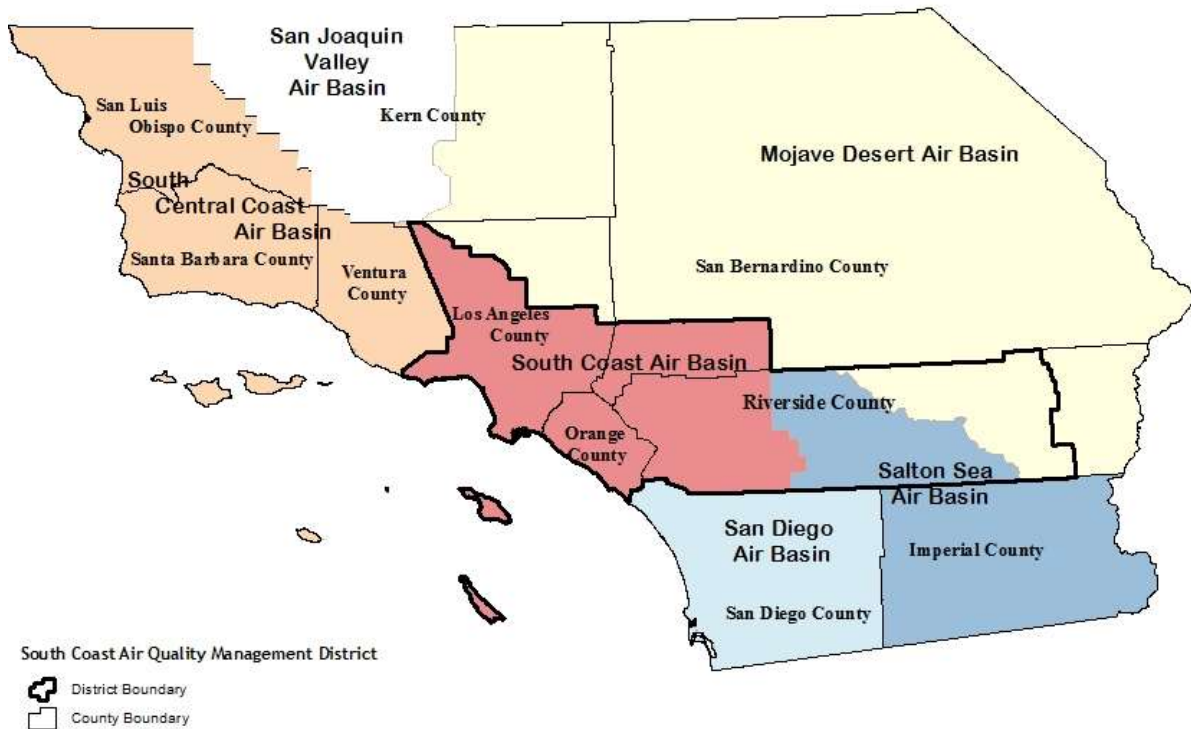
For the topics of air quality and transportation, the original analysis in the Draft EA was conservative with multiple facilities potentially undergoing concurrent construction activities on the same day even though the extended implementation timeframes allowed by PAR 1178 would make such an overlap unlikely. For this reason, the conclusion of less than significant peak daily construction impacts to air quality and transportation did not change as a result of the modifications made to the PAR 1178 after the Draft EA was circulated for public review and comment. Modifications were also made to the total greenhouse gas (GHG) emission calculations, which are quantified on an annual basis, and energy impacts, both of which resulted in slightly increased, but less than significant impacts. For this reason, the conclusion of less than significant GHG and energy impacts also did not change as a result of the modifications made to the PAR 1178 after the Draft EA was circulated for public review and comment. Lastly, revisions to the proposed project in response to verbal or written comments during the rule development process were not found to create new, avoidable significant effects. As a result, these revisions do not require recirculation of the Draft EA pursuant to CEQA Guidelines Sections 15073.5 and 15088.5. Therefore, the Draft EA has been revised to include the aforementioned modifications such that is now the Final EA for the proposed project.

Prior to making a decision on the adoption of the proposed project, the South Coast AQMD Governing Board must review and certify the Final EA, including responses to comments, as providing adequate information on the potential adverse environmental impacts that may occur as a result of amending Rule 1178.

PROJECT LOCATION

The proposed project applies to owners or operators of storage tanks used to store organic liquid located at any petroleum facility that emits more than 20 tons per year of VOC in any reporting year starting with emission inventory year 2000: 1) aboveground storage tanks with capacity equal to or greater than 75,000 liters (19,815 gallons) storing organic liquid with a true vapor pressure (TVP) greater than 0.1 psia under actual storage conditions; and 2) storage tanks with a potential for VOC emissions of six tons per year used in crude oil and natural gas production operations. PAR 1178 applies to ~~1,093~~ ~~1,059~~ tanks located at ~~30~~ ~~27~~ facilities including refineries, bulk storage, loading, and oil production facilities. However, only ~~54~~ ~~59~~ tanks at ~~eight~~ ~~nine~~ facilities will need to be domed and ~~eight~~ ~~24~~ tanks at ~~seven~~ ~~nine~~ facilities will need additional roof seals installed. The majority of affected facilities are located within Los Angeles County near the ports while a few are located in San Bernardino county.

South Coast AQMD's jurisdiction covers an area of approximately 10,743 square miles and includes the four-county Basin (all of Orange County and the non-desert portions of Los Angeles, Riverside and San Bernardino counties), and the Riverside County portion of the Salton Sea Air Basin and the non-Palo Verde, Riverside County portion of the Mojave Desert Air Basin. The Basin is a subarea of South Coast AQMD's jurisdiction; it 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 Riverside County portion of the Salton Sea Air Basin, which is a federal nonattainment area known as the Coachella Valley Planning Area, is bounded by the San Jacinto Mountains to the west and spans the eastern boundary of the Coachella Valley up to the Palo Verde Valley (see Figure 1-1).



**Figure 1-1
Southern California Air Basins and South Coast AQMD’s Jurisdiction**

PROJECT BACKGROUND

Since its adoption on December 1, 2001, Rule 1178 has applied to aboveground storage tanks that have a capacity equal or greater than 75,000 liters (19,815 gallons) used to store organic liquids with a TVP greater than 0.1 psia, located at petroleum facilities that have emitted more than 20 tons of VOC in any reporting year starting with emission inventory year 2000. Potential methods for reducing VOC emissions from aboveground storage tanks subject to Rule 1178 have included converting roofs, increasing the efficiency of emission control systems, covering roof openings, and installing best available rim seal systems.

Rule 1178 was amended several times over the years. Table 1-1 presents a summary of the previous key changes made to Rule 1178 by amendment year:

**Table 1-1
History of Amendments to Rule 1178**

Rule 1178 Amendment Date	Key Changes to Rule 1178
April 7, 2006	<ul style="list-style-type: none"> • Allowed an alternative for drain covers; • Included a modified seal requirement; • Updated the inspection form; and • Clarified the compliance schedule
April 6, 2018	<ul style="list-style-type: none"> • Specified requirements for flexible enclosure systems; • Required repairs or replacements to be conducted within 72 hours of an identified leak; and • Clarified report submissions
November 6, 2020	<ul style="list-style-type: none"> • Allowed certain operators to accept a permit condition limiting vapor pressure on the material stored in lieu of installing a domed roof
May 5, 2023	<ul style="list-style-type: none"> • Expanded rule applicability to include storage tanks subject to the United States Environmental Protection Agency’s (U.S. EPA’s) 2016 Control Techniques Guidelines (2016 CTG) for the Oil and Gas Industry

In accordance with AB 617, which was signed into state law in 2017, and the CARB Community Air Protection Program which implements AB 617, the South Coast AQMD is required to take specific actions to reduce air pollution and toxic air contaminants from commercial and industrial sources to address the disproportionate impacts of air pollution in environmental justice communities, such as Wilmington, Carson, and West Long Beach. The WCWLB CERP, adopted on September 6, 2019 by this community, identified emissions from refineries as an air quality concern, and Chapter 5b, Action 4 in the CERP specifically seeks to have South Coast AQMD initiate rule development to amend Rule 1178. Recommendations for potential amendments included improving current leak detection and repair requirements by incorporating advanced leak detection technologies and requiring additional controls. Also, both the 2016 AQMP and 2022 AQMP included Control Measure FUG-01 – Improved Leak Detection and Repair (LDAR) which was specifically designed to utilize advanced remote sensing technologies to allow for the faster identification and repair of leaks from equipment at oil and gas and other facilities that are currently required to maintain a LDAR program.

In response, staff initiated rule development to amend Rule 1178; however, it was first necessary to perform a limited amendment on November 6, 2020 in response to an affected facility’s request for relief from the requirement of installing a domed roof because doing so could result in a safety hazard. The amendment allowed certain operators to accept a permit condition limiting vapor pressure on the material stored in lieu of installing a domed roof.

In 2016, U.S. EPA released the 2016 CTG for the Oil and Gas Industry. Nonattainment areas classified as “Moderate” or worse, such as South Coast AQMD, are required to implement Reasonably Available Control Technology (RACT) for VOC sources covered by the CTG. Storage tanks covered by the 2016 CTG include those with the potential for VOC emissions of six tons per year or more, and are located at oil and natural gas facilities (excluding distribution); the RACT recommendation for such storage tanks is 95% emission control. While Rule 1178 contained requirements for 95% emission control or greater, the rule did not apply to storage tanks based on the quantity of their potential VOC emissions. Rather, Rule 1178 was applicable to storage tanks based on the capacity and the TVP of the material stored. Because the U.S. EPA stated that it was unclear whether all tanks subject to the 2016 CTG were covered by the applicability requirements, Rule 1178 was amended on May 5, 2023 to ensure the applicability would use direct terms to include storage tanks subject to the U.S. EPA’s 2016 CTG for the Oil and Gas Industry.

PAR 1178 is now being amended to implement the 2022 AQMP Control Measure FUG-01 and the goals of the WCWLB CERP.

TECHNOLOGY OVERVIEW

The following discussion provides a general overview of the control technologies and enhanced leak detection technologies associated with aboveground storage tank emissions.

Control Technologies

Domes

Domes are covers that can be installed onto external floating roof tanks, typically of a geodesic dome shape and made of lightweight material such as aluminum. Domes have the effect of preventing wind movement over the external floating roof as wind can cause vapors from inside the tanks to escape through the floating roof seals. By installing domes onto external floating roof tanks storing crude oil, standing losses may be reduced by 70% to 75%.⁵ Staff identified 54 external floating roof tanks that are used for storing crude oil, ranging from 90 feet to 260 feet in diameter, which could be domed.

Alternative to Doming

Staff analyzed alternative options to doming and determined that by limiting the TVP of crude oil stored, equivalent VOC emission reductions may be achieved. Based on emissions calculations using TankESP PRO software, staff found that limiting Reid Vapor Pressure (RVP) of crude oil to approximately 3.7 psia results in equivalent VOC emission reductions to doming. RVP is the vapor pressure of the organic liquid at 100 degrees Fahrenheit as determined by ASTM Method D-323, whereas TVP is the vapor pressure of the organic liquid at actual storage temperature. The average TVP of crude oil in the storage tanks that results in equivalent emission reductions to doming is 2.2 psia (approximately RVP 3.7 psia). Staff is proposing to maintain the requirement for doming on external floating roof tanks used to store organic liquid with TVP of 3 psia or greater and remove the exemption for crude oil tanks. In lieu of installing a dome on these eligible tanks, some facilities may elect to take a permit condition limiting the storage of only crude oil with a TVP less than 3 psia.

⁵ Based on results from TankESP PRO for doming external floating roofs of different diameters storing crude oil with RVP 6-9 at 80 deg. F in Los Angeles, with deck fittings currently required by Rule 1178.

Emission Control Systems (Vapor Recovery)

Vapor recovery systems collect VOC vapors and either destroy the VOC by combustion or remove VOC from gas streams with adsorption. These systems are currently used for emissions control on sources at petroleum facilities such as fixed roof tanks and truck loading racks. The most common type of vapor recovery system used on fixed roof tanks are combustion systems that have associated NO_x emissions. Adsorption with carbon canisters does not emit NO_x emissions, but has higher capital costs and is less desirable for tanks.

Seals

Primary and secondary seals are used on floating roof tanks to block the annular space between the floating roof and the tank shell, thus preventing the emission of VOC vapors. Gaps between floating roof seals and tank shells are allowed by Rule 1178 and other tank agencies' tank rules; however, more stringent gap requirements are contained in San Joaquin Valley Air Pollution Control District and U.S. EPA rules. Rule 1178 also does not require both a primary seal and secondary seal on all tanks. An assessment was conducted to determine the feasibility to require more stringent gap requirements and secondary seals on all tanks, and staff concluded that ~~eight~~ 24 internal floating roof tanks used to store organic liquid with a true vapor pressure of greater than 0.1 psia were not equipped with secondary seals and would benefit from their installation.

Leak Detection Technologies

Optical Gas Imaging (OGI)

An optical gas imaging camera uses infrared technology to visualize vapors and has different detectors capable of visualizing a variety of gas wavelengths. VOC wavelengths range between 3.2 and 3.4 micrometers. OGI cameras with the ability to detect or visualize in this range of wavelength contain a cryocooler that is integrated into the sensor which increases the sensitivity of the camera and the ability to detect smaller leaks. OGI cameras are widely used a screening tool for leak detection purposes.

OGI cameras are accepted as a viable leak detection technology. Handheld OGI cameras are used widely by leak detection service providers as well as facilities. Figures 1-2 and 1-3 show images captured with an OGI device by South Coast AQMD compliance and enforcement staff.

Staff proposes weekly OGI inspections for all tanks subject to Rule 1178 and additional semi-annual inspections for floating roof tanks. Semi-annual inspections will only be required for floating roof tanks since fixed roof tanks are already subject to quarterly U.S. EPA Method 21 inspections.

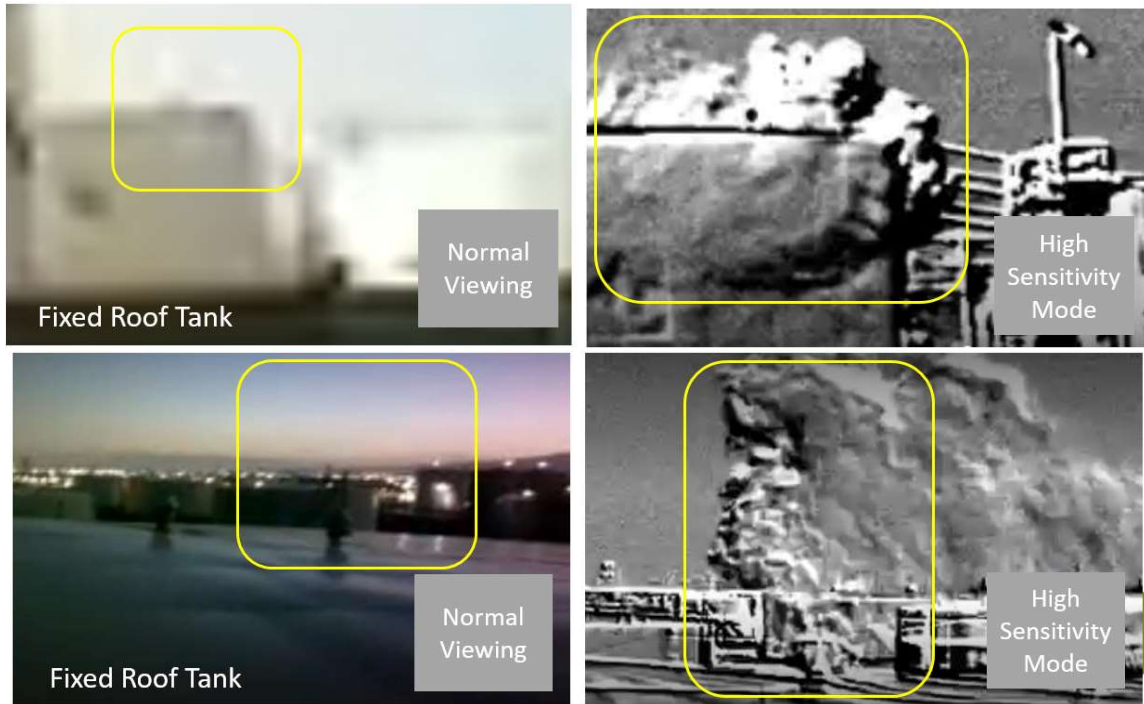


Figure 1-2
Fixed Roof Tank Viewing with an OGI Device

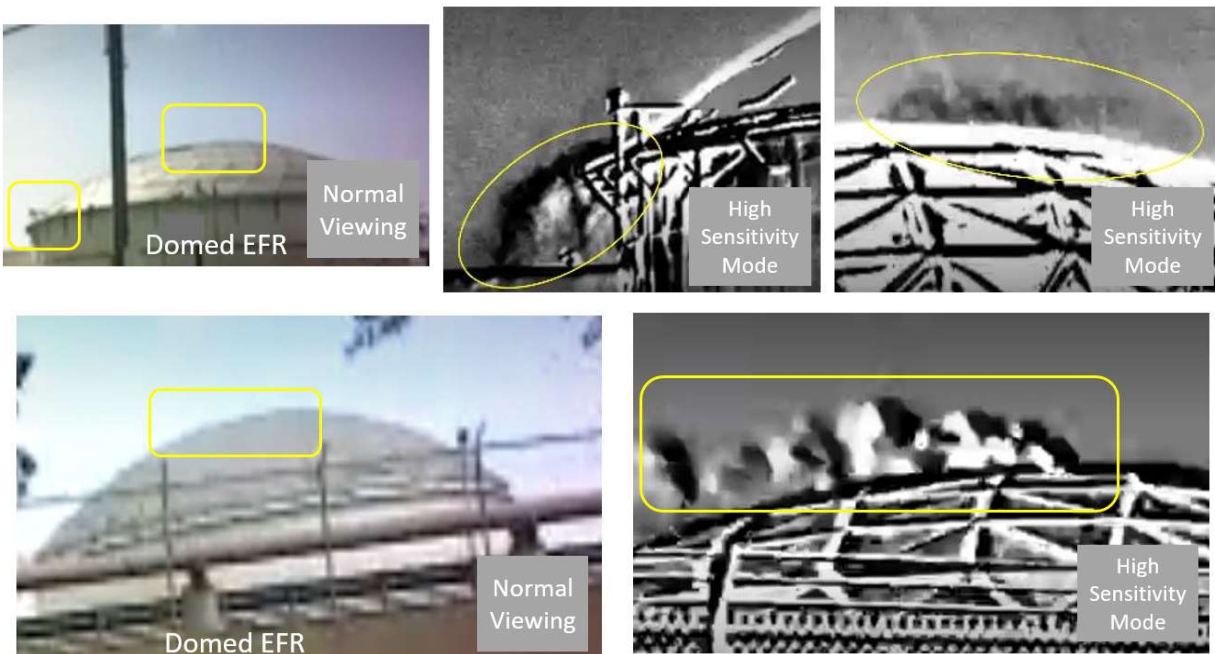


Figure 1-3
Domed External Floating Roof Tank Viewing with an OGI Device

PROJECT DESCRIPTION

Proposed Amended Rule (PAR) 1178 establishes more stringent leak detection and repair and control requirements for storage tanks located at petroleum facilities that have emitted more than 20 tons of VOC in any reporting year since the rule's adoption in 2001. PAR 1178 establishes requirements for: 1) conducting inspections, including but not limited to weekly optical gas inspections; 2) installing domes and secondary seals; 3) increasing the efficiency of emission control systems; and 4) conducting maintenance, recordkeeping, and reporting activities. PAR 1178 applies to storage tanks located at ~~3027~~ facilities including refineries, bulk storage, loading, and oil production facilities. However, only ~~54-59~~ tanks at ~~eight-nine~~ facilities will need to be domed and ~~eight-24~~ tanks at ~~seven-nine~~ facilities will need additional roof seals installed. PAR 1178 is estimated to reduce VOC emissions by 0.82 ton per day.

The following is a detailed summary of the key elements contained in PAR 1178. Appendix A of this EA contains draft rule language; actual text from PAR 1178 is italicized while the explanation and clarification of each provision is in a non-italicized font.

Proposed Amended Rule 1178

PAR 1178 will contain the following subdivisions:

- a) Purpose*
- b) Applicability*
- c) Definitions*
- d) Requirements*
- e) Identification Requirements*
- f) Inspection and Monitoring Requirements*
- g) Maintenance Requirements*
- h) Record Keeping and Reporting Requirements*
- i) Test Methods and Procedures*
- j) Exemptions*

Subdivision (a) – Purpose

The purpose of this rule is to reduce VOC emissions from storage tanks containing organic liquid located at large petroleum facilities.

Subdivision (b) – Applicability

Applicability will be revised to clarify that determination of the 20 tons per year of VOC emissions threshold is based on Annual Emission Reports.

Subdivision (c) – Definitions

Definitions were added for clarity for new requirements and are referenced and discussed below.

- *COMPONENT INSPECTION is monitoring for Visible Vapors with an Optical Gas Imaging Device of a Storage Tank roof and individual components, including but not limited to Roof Openings and Rim Seal Systems, viewable from the tank platform and ground.*
This is a new definition added to specify the requirements for this type of inspection.
- *EMISSION INVENTORY YEAR is the annual emission-reporting period specified by the Annual Emission Reporting Program requirements for a given year.*

This definition was modified to reflect the change in required reporting periods specified by the Annual Emission Reporting Program for different years.

- *OPTICAL GAS IMAGING DEVICE is an infrared camera with a detector capable of visualizing gases in the 3.2-3.4 micrometer waveband.*
This is a new definition to specify the capability of the OGI camera allowed to be used for required OGI inspections.
- *TANK FARM INSPECTION is monitoring for Visible Vapors with an Optical Gas Imaging Device of all applicable Storage Tanks at a Facility where the person conducting the inspection views the top of the tank shell, and fixed roof or dome, if applicable. Tank Farm Inspections may be conducted at an elevated position and/or at ground level.*
This is a new definition added to specify the requirements for this type of inspection.
- *VISIBLE VAPORS is any vapors detected with an Optical Gas Imaging Device during a Component or Tank Farm Inspection, when operated and maintained in accordance with manufacturer training, certification, user manuals, specifications, and recommendations.*
This is a new definition to clarify rule requirements for storage tanks that must be maintained in a condition that is free of Visible Vapors.

Subdivision (d) – Requirements

PAR 1178 includes revisions to existing and new requirements as described in this the following discussion. PAR 1178 establishes requirements for secondary seal gaps, emission control systems efficiencies, doming, testing, implementation, and monitoring. Requirements with implementation dates that that have already been met have been removed for clarity and simplicity.

Secondary Seal Gap Requirements – Clause (d)(1)(C)(iii)

Gap requirements for secondary seals have been revised to reflect the stringency of gap requirements at other air districts as well as the stringency of gap requirements contained in U.S. EPA's 40 CFR 60 Subpart Kb. The lengths of gaps greater than 0.5 inch wide cannot, when totaled together, exceed 10% of the length of the circumference. The length of gaps greater than 1/8 inch wide cannot, when totaled together, exceed 30% of the length of the circumference.

External Floating Roof Tank Condition – Subparagraph (d)(1)(D)

External floating roofs tanks must be kept in a condition free of Visible Vapors resulting from a defect or malfunction of equipment and is determined by an optical gas imaging inspection conducted pursuant to the requirements of paragraph (f)(4).

Doming External Floating Roof Tanks – Subparagraph (d)(1)(E)

Facilities are required to install a dome on any External Floating Roof Tank storing Organic Liquid with a true vapor pressure of 3 psia or greater unless permitted to contain 97% by volume crude oil. All external floating roof tanks permitted to contain 97% by volume crude oil are required to have a dome installed unless a permit application is submitted to limit the true vapor pressure of the crude oil to less than 3 psia within one year from date of adoption. An external floating roof tank permitted to contain 97% by volume crude oil for which a permit application has not been submitted to limit the true vapor pressure to less than 3 psia within one year from date of adoption is subject to the doming schedule of paragraph (d)(5).

True Vapor Pressure Measurements – Subparagraph (d)(1)(F)

Facilities are required to measure and record the true vapor pressure of the organic liquid inside all external floating roof tanks not equipped with a dome on a semi-annual (once every six months) basis to verify the true vapor pressure is less than 3 psia.

Internal/Domed External Floating/Fixed Roof Tank Condition Requirements – Subparagraphs (d)(2)(C), (d)(3)(F), and (d)(4)(C)

Internal floating roof, domed external floating roof, and fixed roof tanks are required to comply with the requirements of subparagraph (d)(1)(D) that specify the condition in which tanks must be maintained.

Emission Control Systems for Fixed Roof Tanks – Clause (d)(4)(A)(i)

Emission control systems required on fixed roof tanks must achieve 98% control efficiency by weight. Based on a review of the available source test reports for emission control systems currently installed on fixed roof tanks, staff found that all met the 98% control efficiency that is proposed. Therefore, staff expects no physical modification to the equipment would be required. However, the permits should be updated to reflect the proposed 98% control efficiency.

Compliance Schedules – Paragraph (d)(5)

This paragraph contains compliance schedules detailing when requirements of the rule apply for facilities currently subject to the rule, facilities that may later become subject to the rule, equipment that becomes subject to specific rule requirements on date of rule adoption, and equipment that may later become subject to specific requirements.

Tank Requirements – Subparagraph (d)(5)(A)

This subparagraph contains existing compliance timelines for tanks to meet the requirements of Rule 1178 if the facility they are located at becomes subject to Rule 1178 after date of rule adoption.

Doming Requirements – Subparagraph (d)(5)(B)

Any facility or facilities under common ownership with external floating roof tanks permitted to contain 97% crude oil by volume that become subject to doming upon date of adoption are required to dome one-third of their applicable tanks by December 31, 2031, half of their applicable tanks by December 31, 2033 and all of their applicable tanks by December 31, 2038.

Crude Oil External Floating Roof Tanks Later Subject to Doming – Subparagraph (d)(5)(C)

Any external floating roof tank that is permitted to contain more than 97% by volume crude oil with a True Vapor Pressure of less than 3 psia, which becomes subject to doming requirements after the date of rule adoption due to exceeding the true vapor pressure limitation of 3 psia or greater, must install a dome within 3 years of that exceedance and becoming subject to the doming requirement.

Internal Floating Roof Tank Requirements – Subparagraph (d)(5)(D)

Any internal floating roof tanks not equipped with a secondary seal are required to have a secondary seal installed the next time the tank is emptied and degassed starting two years after date of adoption. All internal floating roof tanks must have a secondary seal installed no later than 10 years after date of adoption.

Subdivision (f) – Inspection and Monitoring RequirementsOptical Gas Imaging (OGI) Inspections – Paragraph (f)(4)

Optical gas imaging inspections are required to determine compliance with the requirement for tanks to be maintained in a condition that is free of Visible Vapors resulting from a defect or malfunction of control equipment. This paragraph contains the requirements for OGI inspections.

Certification/Training of Person Conducting OGI Inspection – Subparagraph (f)(4)(A)

Persons conducting the OGI inspection must be manufacturer-certified or have undergone manufacturer's training for the camera used, including all subsequent certification or training recommended by the OGI manufacturer. The OGI camera must be operated and maintained in accordance with all manufacturer guidance including but not limited to that stated in any training or certification course, user manuals, specifications, and recommendations.

Tank Farm Inspection Requirements – Subparagraph (f)(4)(B)

This subparagraph contains requirements for Tank Farm Inspections.

Frequency (Tank Farm Inspection) – Clause (f)(4)(B)(i)

Inspections must be conducted at least once every calendar week.

Procedure (Tank Farm Inspection) – Clause (f)(4)(B)(ii)

An inspector is required to monitor for Visible Vapors with a Tank Farm Inspection. If Visible Vapors are detected during a Tank Farm Inspection, an inspector must conduct an additional inspection from the tank's platform to determine the source of emissions. From the platform, an inspector will use an OGI device to inspect components required to be maintained vapor tight or with no visible gaps viewable from the tank platform. If Visible Vapors are detected from any components that are required to be maintained in a Vapor Tight Condition or in a condition with no Visible Gaps, the facility must demonstrate compliance with rule requirements for any component in which Visible Vapors are emitted or make a repair, within 3 days of identifying the Visible Vapors. If Visible Vapors are detected from the roof or other components, the inspector must identify any defects in components or equipment from which Visible Vapors are detected with a visual inspection which may include the use of an OGI device. If no defects are identified, no further action is required for the inspection. If a defect is identified, a repair must be made within 3 days.

Alternative Option (Tank Farm Inspection) – Clause (f)(4)(B)(iii)

If an inspector performs an inspection required by Clause (f)(4)(B)(ii) on tank and determines that no demonstrations and repairs are required, the inspector has the option to record the Visible Vapors from that tank to use as a baseline to determine an increase in emissions in subsequent weekly Tank Farm Inspection for that tank. If Visible Vapors are detected from that tank during the following Tank Farm Inspections but do not indicate an increase in emissions compared to the baseline emissions, the inspector does not need to perform an inspection required by Clause (f)(4)(B)(ii); however, this applies only for the weekly inspections in the same calendar month that the baseline emissions were determined.

Component Inspections – Subparagraph (f)(4)(C)

This subparagraph contains requirements for Component Inspections. Component inspections include monitoring of individual components including, but not limited to rim seals, pressure-vacuum vents, hatches, guidepoles, roof legs, emission control system connections, and vents.

Frequency (Component Inspection) – Clause (f)(4)(C)(i)

Inspections must be conducted at least once every six months for floating roof tanks and may be conducted during other required semi-annual inspections.

Procedure (Component Inspection) – Clauses (f)(4)(C)(ii)-(iii)

Repairs or demonstration with applicable rule requirements must be conducted when Visible Vapors are detected from any component or equipment, except for rim seal systems. Repairs or demonstrations with rim seal requirements must be conducted when Visible Vapors are emitted from the rim seal and are also detectable at the top of the tank shell or from roof vents.

Subdivision (g) – Maintenance Requirements

This subdivision contains maintenance requirements for tanks that do not meet the requirements of the rule.

Repairs Schedules – Paragraph (g)(2)

Repairs or adjustments must be made within three days of identifying Visible Vapors requiring a repair determined pursuant to paragraph (f)(4).

Maintenance Schedule for Domed Tanks – Paragraph (g)(3)

Any tank subject to the doming schedule of paragraph (d)(5) must maintain the dome by performing a complete re-seal of the dome seams and hubcaps every 20 years beginning the date of dome installation.

Subdivision (h) – Reporting and Recordkeeping Requirements

This subdivision contains updated recordkeeping and reporting requirements for OGI inspections and additional reporting requirements of inspections required by paragraphs (f)(1) through (f)(3).

Reporting and Recordkeeping Requirements for OGI Inspections – Paragraph (h)(2)

This paragraph contains notification and recordkeeping requirements for OGI inspections.

Reporting for OGI Inspections – Subparagraph (h)(2)(A)

If Visible Vapors resulting from a defect are detected during a Tank Farm Inspection, facilities must report to 1-800-CUT-SMOG within 24 hours after the inspection is completed.

Records for Tank Farm Inspections – Subparagraph (h)(2)(B)

This subparagraph contains recordkeeping requirements for Tank Farm Inspections. Written and digital records must be kept of Visible Vapors resulting from a defect in equipment or from components required to be vapor tight or with no visible gap.

Records for Component Inspections – Subparagraph (h)(2)(C)

This subparagraph contains recordkeeping requirements for Component Inspections.

Records of True Vapor Pressure – Paragraph (h)(6)

This paragraph was revised to include a requirement to keep records of true vapor pressure test results.

Subdivision (j) – Exemptions

This subdivision contains criteria for exemption from all or some of the requirements of the rule.

Exemption from Doming – Paragraph (j)(3)

This exemption was modified to clarify that tanks with a permit condition limiting the true vapor pressure of the organic liquid stored to less than 3 psia are exempt from doming requirements only if the organic liquid stored in the tank has a true vapor pressure less than 3 psia as demonstrated by required testing.

Exemption for Tanks Storing Organic Liquid with Low True Vapor Pressure – Paragraph (j)(4)

Tanks storing organic liquid with TVP of 0.1 psia or less are exempt from all requirements of the rule provided that the owner or operator tests the TVP of the organic liquid at least every five years for refined organic liquid or products meeting specifications for sale and at least annually for all other organic liquids, and demonstrates a TVP of 0.1 psia or ~~lower~~less.

Exemption from Doming for Crude Oil Tanks – Paragraph (j)(5)

Crude oil tanks that become subject to doming requirements upon the date of rule adoption may be exempt from doming if a permit application is submitted to limit the crude oil TVP to ~~lower~~less than 3 psia within one year from the date of rule adoption. Any crude oil tanks for which a permit application is not submitted to limit the TVP to ~~lower~~less than 3 psia within one year from date of adoption is subject to the doming requirements, including crude oil with a TVP of less than 3 psia.

Exemption from OGI Inspections – Paragraph (j)(6)

Any tank that is empty or opened to the atmosphere, and complying with the requirements of Rule 1149 is exempt from OGI inspections.

Exemption Removals

Former paragraph (j)(2) – Proposed amendments remove the exemption for secondary seals for domed external floating roof tanks. All domed external floating roof tanks subject to the rule must have secondary seal installed.

Former paragraph (j)(7) – Proposed amendments remove the exemption from doming for tanks permitted to contain more than 97% by volume crude oil. Any tank with organic liquid with true vapor pressure of 3 psia or greater is required to install a dome unless otherwise stated in the rule.

CHAPTER 2

ENVIRONMENTAL CHECKLIST

Introduction

General Information

Environmental Factors Potentially Affected

Determination

Environmental Checklist and Discussion

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:	PAR 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities
Lead Agency Name:	South Coast Air Quality Management District
Lead Agency Address:	21865 Copley Drive Diamond Bar, CA 91765
CEQA Contact Person:	Kevin Ni, (909) 396-2462, kni@aqmd.gov
PAR 1178 Contact Person:	Melissa Gamoning, (909) 396-3115, mgamoning@aqmd.gov
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 1178 establishes more stringent leak detection and repair and control requirements for storage tanks located at petroleum facilities that have emitted more than 20 tons of VOC in any reporting year since the rule's adoption in 2001. PAR 1178 establishes requirements for: 1) conducting inspections, including but not limited to weekly optical gas inspections; 2) installing domes and secondary seals; 3) increasing the efficiency of emission control systems; and 4) conducting monitoring, maintenance, recordkeeping, and reporting activities. PAR 1178 applies to storage tanks located at <u>30</u> 27 facilities including refineries, bulk storage, loading, and oil production facilities. PAR 1178 is estimated to reduce VOC emissions by 0.82 ton per day.
Surrounding Land Uses and Setting:	Various
Other Public Agencies Whose Approval is Required:	Not applicable

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 an "✓" involve at least one impact that is a "Potentially Significant Impact". 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 and Hazardous Waste |
| <input type="checkbox"/> Cultural and Tribal Cultural Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Mandatory Findings of Significance | | |

DETERMINATION

On the basis of this initial evaluation:

- I find the proposed project, in accordance with those findings made pursuant to CEQA Guidelines Section 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: July 18, 2023

Signature: 

Kevin Ni
Acting Program Supervisor, CEQA
Planning, Rule Development and
Implementation

ENVIRONMENTAL CHECKLIST AND DISCUSSION

As explained in Chapter 1, PAR 1178 proposes to reduce VOC emissions from storage tanks used to store organic liquid located at any petroleum facility that emits more than 20 tons per year of VOC in any reporting year starting with emission inventory year 2000: 1) aboveground storage tanks with capacity equal to or greater than 75,000 liters (19,815 gallons) storing organic liquid with a true vapor pressure greater than 5 mmHg (0.1 psia) under actual storage conditions; and 2) storage tanks with a potential for VOC emissions of six tons per year used in crude oil and natural gas production operations. PAR 1178 proposes to establish more stringent leak detection and repair and control requirements, such as weekly optical gas inspections, and additional control requirements for domes, secondary seals, and emission control systems.

Of the proposed changes in PAR 1178, only the installation of domes on external floating roof tanks and additional roof seals on internal floating roof tanks are expected to require physical modifications involving construction and these activities could create secondary adverse environmental impacts. In particular, installing domes on external floating roof tanks and additional roof seals on internal floating roof tanks under PAR 1178 might require the specific storage tank set to undergo modifications to be emptied and degassed first if repairs are needed. Construction from doming external floating roof tanks involves assembling the dome, lifting it, and installing the dome; while installing additional roof seals on internal floating roof tanks is a one-step process. These activities create the potential for secondary adverse environmental impacts from construction.

PAR 1178 provides long time frames for when domes are required to be installed on applicable storage tanks in accordance with subparagraph (d)(5)(B), as follows: one-third of applicable storage tanks by year's end 2031, half by year's end 2033, and all remaining tanks by year's end 2038. In addition, construction activities associated with installing domes are expected to occur concurrently in situations when requirements other than PAR 1178 necessitate emptying and degassing the tank. For example, PAR 1178 subparagraph (d)(5)(A)(iii) specifies that the timing of construction should be coordinated and coincide with when the storage tank is next emptied or degassed when installing additional roof seals on internal floating roof tanks. For these reasons, storage tank emptying and degassing activities are not considered unique to PAR 1178 and as such, the environmental impacts from these activities are excluded from the analysis of construction activities. In addition, no grading or site preparation activities are required for constructing domes. Thus, this construction analysis focuses on impacts from the combined efforts associated with: 1) doming external floating roof tanks which involves assembling the dome, lifting it, and installing the dome; and 2) installing additional roof seals on internal floating roof tanks as a one-step process.

Once the domes and additional roof seals are installed, no changes in process operations involving these storage tanks are expected to occur. Therefore, other than VOC emission reductions, which are an environmental benefit to air quality, no adverse operational impacts are expected.

Other components of PAR 1178, such as requirements for conducting weekly optical gas imaging inspections and other types of inspections, establishing a maintenance repair schedule and conducting maintenance, and implementing recordkeeping and reporting provisions would not be expected to cause any physical changes that would create any secondary adverse environmental impacts either during construction or operation.

For these reasons, the analysis in this EA focuses on the key elements in the proposed project with the potential to create secondary adverse environmental impacts associated with doming ~~54~~59 external floating roof tanks at ~~eight~~nine facilities and installing additional secondary seals on ~~eight~~24 internal floating roof tanks.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
I. <u>AESTHETICS.</u> Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point(s).) If the project is in an urbanized area, would the project conflict with applicable zoning or other regulations governing scenic quality?	<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 public views from a scenic highway or corridor.
- The project will adversely affect the visual continuity of public views 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

PAR 1178 applies to ~~1,093~~ ~~1,059~~ storage tanks located at ~~30~~ ~~27~~ facilities including refineries, bulk storage, loading, and oil production facilities. However, only ~~54~~ ~~59~~ tanks at ~~eight~~ ~~nine~~ facilities will need to be domed and ~~eight~~ ~~24~~ tanks at ~~seven~~ ~~nine~~ facilities will need additional roof seals installed. PAR 1178 is estimated to reduce VOC emissions by 0.82 ton per day. The components of PAR 1178 that would be expected to have physical effects are installing domes on external floating roof tanks and additional roof seals on internal floating roof tanks. Incorporating advanced leak detection technologies, and updating maintenance, recordkeeping, and reporting requirements are not expected to create any secondary adverse environmental impacts.

I. a), b), & c) Less Than Significant Impact. For the purpose of determining significance under CEQA, a scenic vista is generally considered a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. Some scenic vistas are officially designated by public agencies, or informally designated by tourist guides. Vistas provide visual access or panoramic views to a large geographic area and are generally located at a point where surrounding

views are greater than one mile away. Panoramic views are usually associated with vantage points over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, a large open space area, the ocean, or other water bodies. A substantial adverse effect to a scenic vista is one that degrades the view from such a designated view spot.

A scenic highway is generally considered a stretch of public roadway that is designated as a scenic corridor by a federal, state, or local agency. Caltrans defines a scenic highway as any freeway, highway, road, or other public right of way, that traverses an area of exceptional scenic quality.

Physical modifications associated with the proposed project are limited to doming external floating roof tanks and installing additional roof seals on internal floating roof tanks at existing facilities. The construction equipment is expected to be at the height of or just above the existing storage tanks and not substantially visible to the surrounding area due to construction occurring within each existing facility's property line, existing fencing along property lines, and existing structures currently within each facility's boundaries that may buffer the views of the construction activities.

Since the affected facilities are located in existing industrial areas, the construction equipment is not expected to be substantially discernable from other off-road equipment that exists on-site for routine operations and maintenance activities. Further, the construction activities are not expected to adversely impact views and aesthetics resources since most of the construction equipment and activities are expected to occur within the confines of each existing facility and are expected to introduce only minor visual changes to areas outside each facility, if at all, depending on the location of the construction activities within each affected facility. In addition, the construction activities are expected to be temporary in nature. Once construction is completed, all construction equipment would be removed from each facility.

Since all of the affected facilities are located in urbanized areas, any changes to the buildings or structures would require approvals from the local city or county planning departments. It is important to note that the affected facilities are located throughout Los Angeles county, with some located in San Bernardino county. Both counties are mandated by the state of California to prepare a general plan containing an aesthetics element. None of the anticipated physical activities associated with implementing PAR 1178 are intended to interfere or be inconsistent with the local planning department aesthetics requirements in their general plans. Based on the locations of the affected facilities, the proposed project would neither take place in nor have a substantial adverse effect on a scenic vista indicated in the Los Angeles County General Plan 2035 or San Bernardino Countywide Plan.^{6, 7} Further, none of the affected facilities are located within the views of a scenic vista or state scenic highway as designated by the California Department of Transportation (CalTrans).⁸ Also, Therefore, PAR 1178 would not be expected to conflict with applicable zoning or other regulations governing scenic quality.

In addition, staff received a comment claiming that installation of domed roofs on large storage tanks could change the visual character of the landscape, particularly for storage tanks located near

⁶ Los Angeles County, General Plan 2035 Chapter 9 Section VII, Updated July 14, 2022. https://planning.lacounty.gov/wp-content/uploads/2022/11/9.0_gp_final-general-plan-ch9.pdf.

⁷ San Bernardino County, Countywide Plan, Accessed January 2023. <https://countywideplan.com/policy-plan/natural-resources/>

⁸ Caltrans, Officially Designated County Scenic Highways. Accessed January 2023. <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>

coastal sightlines. Of the ~~eight~~nine facilities with the ~~54~~59 existing storage tanks that may be domed, Figure 2-1 illustrates the locations of the ~~eight~~nine facilities and their proximity to coastal areas and only three facilities are located at or near the coastline.

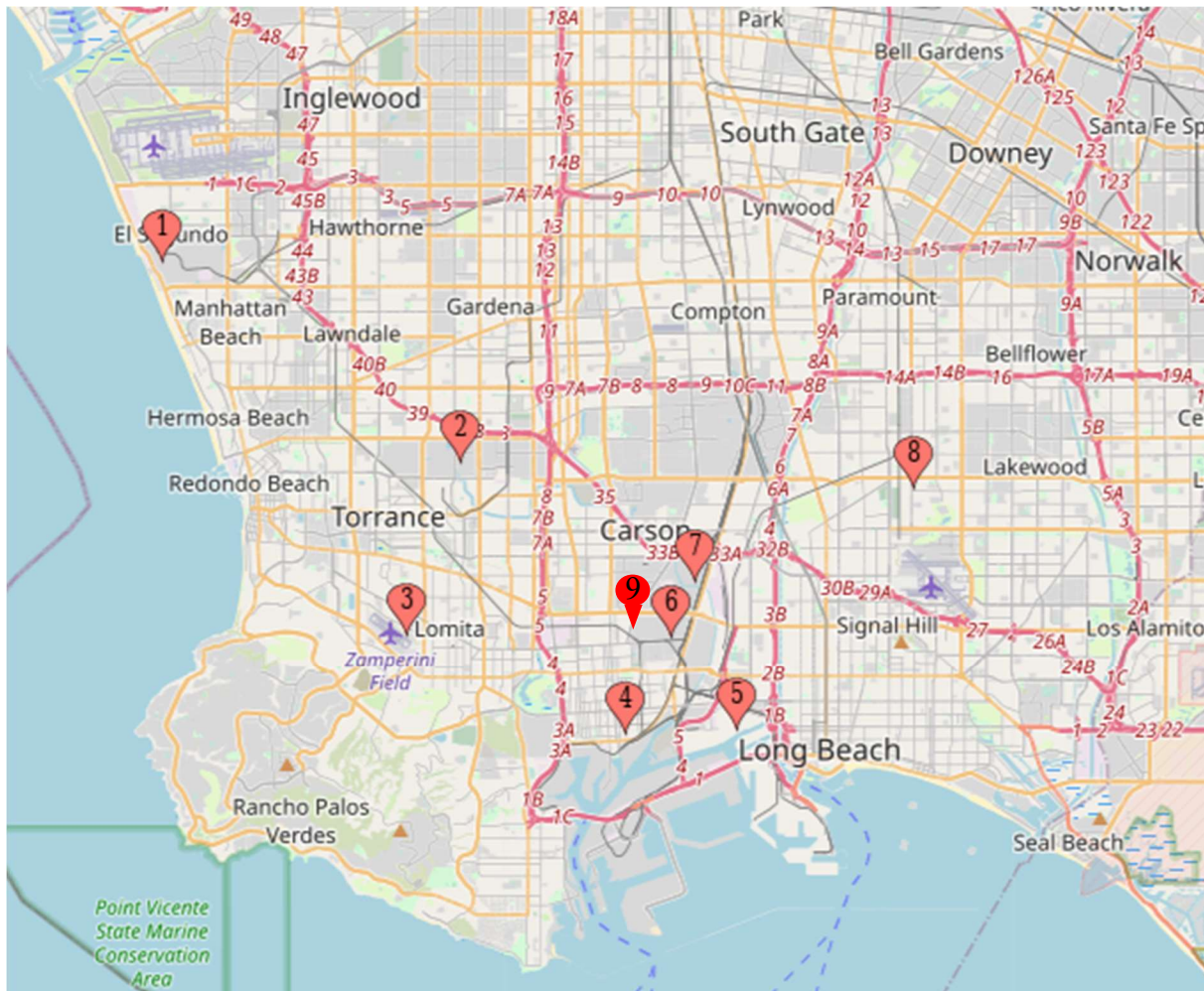


Figure 2-1
Proximity of Affected Facilities to Coastal Areas

Whether a facility is located near the coast or more inland, these existing properties are zoned for heavy industrial use. Existing storage tanks are clustered, and all ~~eight~~nine facilities proposed to have domes installed on their external floating roof tanks already have other existing storage tanks which are domed. Of the facilities subject to PAR 1178, there are 260 existing domed storage tanks. Thus, installing more domes on other existing storage tanks will not be expected to significantly change the overall visual character of the facilities themselves or the surrounding landscape, whether located near the coast or more inland.

The existing storage tanks that will be domed range in height from 37 to 63 feet and diameter from 90 to 260 feet. For context, the size of these storage tanks can be compared to a building that is almost four to seven floors or stories in height.

Domes for these existing storage tanks are typically designed with a maximum radius equal to 1.2 times the tank diameter with a minimum of 0.7 times the tank diameter; the ratio of dome height

to tank diameter is about 1:6.⁹ For example, the largest of the affected storage tanks that would need a dome is 63-feet in height with a diameter of 260 feet and the new dome would be one-sixth of the diameter, or 43.3 feet which is equivalent to adding about four floors or stories in a building. After doming, the total height would be approximately 106 feet.

In conclusion, the visual character of the landscape at these ~~eight~~nine facilities is already predominantly defined by the existing storage tanks themselves, and at a height that already obstructs the surrounding views, depending on the observer's location, regardless of whether the storage tanks are located at or near the coast or coastal sightlines or more inland. Further, the installation of domes are expected to blend in with the current industrial aesthetic profile of existing domed storage tanks at these ~~eight~~nine facilities.

The requirements in PAR 1178 specific to conducting monitoring and inspections would involve low-profile activities, if at all, that would be expected to blend in with routine day-to-day operations occurring within the fence line of each affected facility. Therefore, monitoring and inspections would not be expected to cause any discernable aesthetic impacts visible to outside the property lines of each facility.

Based on the foregoing analysis, implementation of the proposed project would have less than significant impacts on scenic vistas and would not be expected to substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. In addition, PAR 1178 would not be expected to substantially degrade the existing visual character or quality of public views of the affects sites and their surroundings. Finally, PAR 1178 would not be expected to conflict with applicable zoning or other regulations governing scenic quality.

I. d) Less Than Significant Impact. PAR 1178 does not include any components that would require construction activities to occur at night. Further, cities often have their own limitations and prohibitions that restrict construction from occurring during evening hours and weekends. Therefore, no additional temporary construction lighting at the facility would be expected. However, if facility operators determine that the construction schedule requires nighttime activities, temporary lighting may be required. Nonetheless, since construction activities would be completely located within the boundaries of each affected facility, additional temporary lighting is not expected to be discernable from the existing permanent night lighting.

The existing buildings at the affected facilities are currently illuminated at night for safety and security purposes, and the lighting typically faces toward the interior of each facility's property so that they point downward or parallel to the ground, which has the effect of limiting the amount of lighting to what is needed to adequately illuminate the specific locations. While minimal, additional permanent light sources could potentially be installed at or near the installation of new domes, PAR 1178 does not specifically require new lighting to be installed. Thus, any new lighting, if installed, would likely be consistent in intensity and type with the existing lighting on equipment and other structures at the existing facilities and directed to minimize potential lighting impacts on areas outside the property lines. These practices are followed to avoid or minimize potential lighting impacts on areas outside each facility's property. Since the anticipated

⁹ Maxwell Continental Tank Serv Engineering, <https://maxwelltanks.com/domed-floating-roof-tank/alu-geodesic-dome-roofs/>, accessed on July 14, 2023.

modifications would occur within the boundaries of each facility's property, no new areas are expected to be illuminated off-site by permanent additional lighting, in the event any new lighting is installed.

Staff received a comment claiming that the potential solar reflectance and glare from domed roofs constructed of aluminum or other reflective alloys will cause glare impacts in a similar manner to cool roof technology. Dome manufacturers indicated that standard doming material is mill finish aluminum, which is not the same as cool roof technology. In addition, while any new aluminum dome could create an initial glare initially, the dome's aluminum panels will gradually oxidize such that the initial glare will dull naturally over the course of three to 12 months, or sooner at facilities located within industrial areas or by the ocean. In addition, to more quickly alleviate or eliminate the glare, dome panels can also be painted or sandblasted to dull the finish.

As described earlier in the discussion for questions 1a), b), and c), the existing storage tanks are at a very tall height (e.g., from 37 to 63 feet) and the installation of a dome would increase the total overall height by about 15 to 44 feet, depending on the tank diameter. As such, the installation of aluminum domes will mainly reflect up towards the sky except for certain angles and at certain times of the day as the sun moves across the sky. The degree of reflection will fade over time as the aluminum oxidizes. In any case, construction to install domes, whether painted, unpainted or sanded, on the affected storage tanks will be subject to local planning department aesthetics requirements to avoid any conflict with a city or county general plan's aesthetics element. PAR 1178 does not contain requirements or restrictions relative to the surface features of the dome. Further, all facility owners have other existing storage tanks that are domed and prior experience and understanding of what the local planning departments and any other agencies that may have oversight have required previously and if any glare reduction actions may be needed on any new domes that are installed at the individual site. As such, facility owners will need to work with contractors and coordinate with the local planning agency when designing each dome to determine the appropriate course of action for how to employ glare minimization features on the domes, if needed.

For these reasons, the proposed project would not create a new source of substantial light or glare at any of the affected facilities in a manner that would significantly adversely affect day or nighttime views in the surrounding areas.

Conclusion

Based upon these considerations, less than significant adverse aesthetics impacts are expected from implementing the proposed project. 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
II. <u>AGRICULTURE AND FORESTRY RESOURCES.</u> 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 Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 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"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland, to non-agricultural use 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 Section 12220(g)), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 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

PAR 1178 applies to ~~1,093~~ ~~1,059~~ storage tanks located at ~~30~~ ~~27~~ facilities including refineries, bulk storage, loading, and oil production facilities. However, only ~~54~~ ~~59~~ tanks at ~~eight~~ ~~nine~~ facilities will need to be domed and ~~eight~~ ~~24~~ tanks at ~~seven~~ ~~nine~~ facilities will need additional roof seals installed. PAR 1178 is estimated to reduce VOC emissions by 0.82 ton per day. The components of PAR 1178 that would be expected to have physical effects are installing domes on external floating roof tanks and additional roof seals on internal floating roof tanks. Incorporating advanced leak detection technologies, and updating maintenance, recordkeeping, and reporting requirements are not expected to create any secondary adverse environmental impacts.

II. a), b), c), d), & e) No Impact. Pursuant to the California Land Conservation Act of 1965, a Williamson Act Contract enables private landowners to voluntarily enter into contracts with local governments for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive lower property tax assessments based upon farming and open space uses as opposed to full market value.

The affected facilities and their immediately surrounding 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 Department of Conservation.¹⁰ 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 agriculture use or a Williamson Act contract. The construction and operation activities would be expected to occur within the confines of existing industrial facilities; thus, the proposed project is not expected to result in converting farmland to non-agricultural use; conflict with existing zoning for agricultural use, or a Williamson Act Control.

All of the facilities are located in industrial use areas in the urban portion of South Coast AQMD's jurisdiction and, as such, are 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 Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)) 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.

Conclusion

Based upon these considerations, significant adverse agriculture and forestry resources impacts are not expected from implementing the proposed project. Since no significant agriculture and forestry resources impacts were identified, no mitigation measures are necessary or required.

¹⁰ California Department of Conservation, California Important Farmland Finder, Accessed January 2023.
<https://maps.conservation.ca.gov/DLRP/CIFF/>

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
III. <u>AIR QUALITY AND GREENHOUSE GAS EMISSIONS.</u>				
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) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) 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"/>
f) 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"/>
g) 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 and greenhouse gas impacts from implementing the proposed project are significant, impacts will be evaluated and compared to the criteria in Table 2-1. The proposed project will be considered to have significant adverse impacts if any one of the thresholds in Table 2-1 are equaled or exceeded.

Table 2-1
South Coast AQMD Air Quality Significance Thresholds

Mass Daily Thresholds ^a		
Pollutant	Construction	Operation
NO_x	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM₁₀	150 lbs/day	150 lbs/day
PM_{2.5}	55 lbs/day	55 lbs/day
SO_x	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs), Odor, and GHG Thresholds		
TACs (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)	
Odor	Project creates an odor nuisance pursuant to South Coast AQMD Rule 402	
GHG	10,000 MT/yr CO ₂ eq for industrial facilities	
Ambient Air Quality Standards for Criteria Pollutants ^b		
NO₂ 1-hour average annual arithmetic mean	South Coast AQMD 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)	
PM₁₀ 24-hour average annual average	10.4 $\mu\text{g}/\text{m}^3$ (construction) ^c & 2.5 $\mu\text{g}/\text{m}^3$ (operation) 1.0 $\mu\text{g}/\text{m}^3$	
PM_{2.5} 24-hour average	10.4 $\mu\text{g}/\text{m}^3$ (construction) ^c & 2.5 $\mu\text{g}/\text{m}^3$ (operation)	
SO₂ 1-hour average 24-hour average	0.25 ppm (state) & 0.075 ppm (federal – 99 th percentile) 0.04 ppm (state)	
Sulfate 24-hour average	25 $\mu\text{g}/\text{m}^3$ (state)	
CO 1-hour average 8-hour average	South Coast AQMD 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)	
Lead 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)	

^a Source: South Coast AQMD CEQA Handbook (South Coast AQMD, 1993)

^b Ambient air quality thresholds for criteria pollutants based on South Coast AQMD Rule 1303, Table A-2 unless otherwise stated.

^c Ambient air quality threshold based on South Coast AQMD 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 CO₂eq = metric tons per year of CO₂ equivalents > = greater than

Revision: March 2023

Discussion

PAR 1178 applies to ~~1,093~~ ~~1,059~~ storage tanks located at ~~30~~ ~~27~~ facilities including refineries, bulk storage, loading, and oil production facilities. However, only ~~54~~ ~~59~~ tanks at ~~eight~~ ~~nine~~ facilities will need to be domed and ~~eight~~ ~~24~~ tanks at ~~seven~~ ~~nine~~ facilities will need additional roof seals installed. PAR 1178 is estimated to reduce VOC emissions by 0.82 ton per day. The components of PAR 1178 that would be expected to have physical effects are installing domes on external floating roof tanks and additional roof seals on internal floating roof tanks. Incorporating advanced leak detection technologies, and updating maintenance, recordkeeping, and reporting requirements are not expected to create any secondary adverse environmental impacts.

III. a) No Impact. The South Coast AQMD is required by law to prepare a comprehensive district-wide 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 South Coast AQMD’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, the South Coast AQMD is also required to attain the state and federal ambient air quality standards for all criteria pollutants.

The most recent regional blueprints for how the South Coast AQMD will achieve air quality standards and healthful air are outlined in the 2022 AQMP¹¹ which contains multiple goals of promoting reductions of criteria air pollutants, greenhouse gases, and toxics. In particular, the 2022 AQMP contains Control Measure FUG-01– Improved Leak Detection and Repair (LDAR), which explores the potential for newer leak detection technologies to improve current LDAR requirements thereby reducing emissions of VOC from fugitive leaks from process and storage equipment from a variety of sources including, but not limited to, oil and gas production, petroleum refining, storage and transfer, etc.

The proposed project is not expected to obstruct or conflict with the implementation of the 2022 AQMP because minimizing VOC emissions from implementing the proposed project is in accordance with the emission reduction goals in the 2022 AQMP, and in particular, Control Measure FUG-01. Thus, implementing the proposed project would not conflict with or obstruct implementation of the applicable air quality plan.

III. b) and e) Less Than Significant Impact. While the proposed project is designed to reduce fugitive VOC emissions from aboveground storage tanks, secondary air quality impacts are expected due to PAR 1178 physical activities that would occur from its implementation, in particular: assembly and installation of domes on external floating roof tanks, and installation of additional roof seals on internal floating roof tanks. Incorporating OGI as an additional component to existing LDAR practices and implementing other components of the proposed project are not expected to have construction impacts. Because the proposed project will not affect operation, no secondary adverse impacts to air quality or greenhouse gases are expected from operation, and this EA is limited to the analysis of construction impacts.

¹¹ South Coast AQMD, Final 2022 Air Quality Management Plan, December 2022. <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>

Construction Impacts

PAR 1178 provides long time frames for when domes are required to be installed on applicable storage tanks in accordance with subparagraph (d)(5)(B), as follows: one-third of applicable storage tanks by year's end 2031, half by year's end 2033, and all remaining tanks by year's end 2038. In addition, construction activities associated with installing domes are expected to occur concurrently in situations when requirements other than PAR 1178 necessitate emptying and degassing the tank. For example, PAR 1178 subparagraph (d)(5)(E) specifies that the timing of construction should be coordinated and coincide with when the storage tank is next emptied or degassed when installing additional roof seals on internal floating roof tanks. For these reasons, storage tank emptying and degassing activities are not considered unique to PAR 1178 and as such, the environmental impacts from these activities are excluded from the analysis of construction activities. In addition, no grading or site preparation activities are required for constructing domes. Thus, this construction analysis focuses on impacts from the combined efforts associated with: 1) doming external floating roof tanks which involves assembling the dome, lifting it, and installing the dome; and 2) installing additional roof seals on internal floating roof tanks as a one-step process.

Because of the long timeframes allowing for facilities to comply with PAR 1178, it is unlikely that a given facility will perform construction on more than one tank at a given time, or that multiple facilities will perform construction activities on the same day.

The following construction details include a collection of information based on recent conversations between South Coast AQMD rules staff with a supplier, and previous parameters regarding quantities and types of construction equipment considered in the modeling conducted in the December 2001 Final EA for Proposed Amended Rule 1178.¹² For worst case emissions estimates for the current proposal were based on the following criteria: 1) the modeled tank is assumed to be 260 feet in diameter (600,000 barrels of crude oil capacity, the largest in the PAR 1178 universe of equipment); 2) any type of construction equipment which was mentioned by the supplier or the previous CEQA document or both was used in this analysis,¹³ and 3) for any differences in operating duration of the construction equipment as cited by sources, the longer use duration was applied in this analysis. Since no grading or site preparation is needed for doming activities, this construction analysis excludes these activities.

The following bullets summarize the assumptions relied upon for the construction analysis:

Doming an External Floating Roof Tank

- On-road Motor Vehicles:
 - 1 Material Delivery Truck driving 50 miles per day
 - 10 Worker Vehicles driving 40 miles per day
- Off-road Construction Equipment:
 - 1 Crane, 3 Welders, and 1 Compressor each operating for 10 hours per day, 6 days per week, for 12 to 6 weeks

¹² South Coast AQMD, Final Environmental Assessment for Proposed Amended Rule 1178 - Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities. <http://www.aqmd.gov/home/research/documents-reports/lead-agency-scaqmd-projects/aqmd-projects---year-2001>

¹³ Welders were not incorporated in the December 2001 Final EA for Proposed Amended Rule 1178, and compressors were not mentioned by the supplier to South Coast AQMD rules staff in their communication but to be conservative, both welders and compressors are included in this construction analysis.

Installing Additional Roof Seals on an Internal Floating Roof Tank

- On-road Motor Vehicles:
 - 1 Material Delivery Truck driving 50 miles per day
 - 10 Worker Vehicles driving 40 miles per day
- Off-road Construction Equipment:
 - 1 Crane for 4 hours per day, 5 days per week, and 8 weeks
 - 1 Compressor for 8 hours per day, 5 days per week, and 8 weeks

Criteria pollutant emissions were calculated for off-road construction equipment used for retrofitting the storage tanks and on-road motor vehicles transporting workers and material deliveries during construction using the California Emissions Estimator Model® (CalEEMod), version 2022.1.1.3. The detailed output reports for the CalEEMod¹⁴ runs, and a summary excel sheet with the peak daily construction impacts by construction activity type and season are included in Appendix B.

With only 54-59 tanks at eight-nine facilities undergoing construction to install new domes and eight-24 tanks at seven-nine facilities undergoing construction to install additional roof seals coupled with the long time frame for implementation means that as a practical matter, it is unlikely that one facility will perform construction on more than one tank at a given time, and that multiple facilities will perform construction activities on the same day. Nonetheless, to illustrate the magnitude of what the air quality impacts would be from overlapping construction activities, Table 2-2 summarizes the peak daily emissions associated with doming one external floating roof tank, installing additional roof seals for one tank, and concurrent installation of eight domes and seven additional roof seals.

**Table 2-2
Peak Daily Construction Emissions by Pollutant (lb/day)**

Construction Activity	VOC	NOx	CO	SOx	PM10	PM2.5
Doming 1 External Floating Roof Tank	0.91	8.41	11.50	0.02	0.67	0.40
Installing Additional Roof Seals for 1 Internal Floating Roof Tank	0.34	3.03	4.81	0.01	0.44	0.18
Doming 8 Tanks and Installing Additional Roof Seals for 7 Tanks	9.66	88.49	125.67	0.23	8.44	4.46
Significance Threshold for Construction	75	100	550	150	150	55
Significant?	NO	NO	NO	NO	NO	NO

The air quality analysis indicates that the peak daily construction emissions do not exceed the South Coast AQMD's air quality significance thresholds for any pollutant during construction. Thus, the air quality impacts during construction are concluded to be less than significant.

¹⁴ CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects.

Cumulatively Considerable Impacts

Based on the foregoing analysis, since criteria pollutant project-specific air quality impacts from implementing the proposed project would not be expected to exceed any of the air quality significance thresholds in Table 2-1, cumulative air quality impacts are also expected to be less than significant. South Coast AQMD cumulative air quality significance thresholds are the same as project-specific air quality significance thresholds. Therefore, potential adverse impacts from implementing the proposed project would not be “cumulatively considerable” as defined by CEQA Guidelines Section 15064(h)(1) for air quality impacts. Per CEQA Guidelines Section 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 cumulatively considerable.

The South Coast AQMD’s guidance on addressing cumulative impacts for air quality is as follows: “As Lead Agency, the South Coast 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 South Coast AQMD 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.”¹⁵

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 AQMD’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 Section 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 non-attainment 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 South Coast AQMD has demonstrated, when using accurate and appropriate data and assumptions, that the project will not exceed the established South Coast AQMD 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 AQMD’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 proposed project would not contribute to a significant unavoidable cumulative air quality impact. Since no cumulatively significant air quality impacts were identified, no mitigation measures are necessary or required.

¹⁵ South Coast AQMD 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>

III. c) Less Than Significant Impact.***Toxic Air Contaminants (TACs) During Construction***

Diesel powered vehicles and equipment would be utilized during construction activities. Diesel PM is considered a carcinogenic and chronic TAC. A construction activity would be completed within four months; thus, a Health Risk Assessment (HRA) was not conducted, which is consistent with the Office of Environmental Health Hazard Assessment (OEHHA) Guidance Manual (2015). The analysis in Section III b) and e) concluded that the quantity of pollutants that may be generated from implementing the proposed project would be less than significant during construction. Because the emissions from all activities that may occur as part of implementing the proposed project are at less than significant levels, neither would the emissions be substantial, regardless of whether sensitive receptors are located near the affected facilities. Therefore, PAR 1178 is not expected to generate significant adverse TAC impacts from construction or expose sensitive receptors to substantial pollutant concentrations. Since no significant air quality impacts were identified for TACs, no mitigation measures are necessary or required.

III. d) Less Than Significant Impact.***Odor Impacts***

Odor problems depend on individual circumstances. For example, individuals can differ quite markedly from the populated average in their sensitivity to odor due to any variety of innate, chronic or acute physiological conditions. This includes olfactory adaptation or smell fatigue (i.e., continuing exposure to an odor usually results in a gradual diminution or even disappearance of the small sensation).

During construction, diesel-fueled equipment and vehicles would be operated. Diesel fuel is required to have a low sulfur content (e.g., 15 ppm by weight or less) in accordance with South Coast AQMD Rule 431.2 – Sulfur Content of Liquid Fuels;¹⁶ thus, the fuel is expected to have minimal odor. The operation of construction equipment would occur within the boundaries of existing affected facilities. It would be expected that sufficient dispersion of diesel emissions over distance generally occurs such that odors associated with diesel emissions may not be discernable to off-site receptors, depending on the location of the equipment and its distance relative to the nearest off-site receptor. The diesel trucks and equipment that would be operated on-site as a part of construction activities would not be allowed to idle longer than five minutes per any one location in accordance with the CARB idling regulation,¹⁷ so lingering odors from idling vehicles would not be expected. In addition, construction activities would be temporary. Thus, PAR 1178 is not expected to create significant adverse objectionable odors during construction. Since no significant air quality impacts were identified for odors, no mitigation measures for odors are necessary or required.

¹⁶ South Coast AQMD, Rule 431.2 – Sulfur Content of Liquid Fuels, September 15, 2000. <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-431-2.pdf>

¹⁷ CARB, Guide to Off-Road Vehicle & Equipment Regulations, https://ww2.arb.ca.gov/sites/default/files/offroadzone/pdfs/offroad_booklet.pdf.

III. f) and g) Less Than Significant Impacts.

Greenhouse Gas (GHG) Impacts

Significant changes in global climate patterns have recently been associated with global warming, an average increase in the temperature of the atmosphere near the Earth's surface, 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. State law defines GHG to include the following: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆) (Health and Safety Code Section 38505(g)). The most common GHG that results from human activity is CO₂, followed by CH₄ and N₂O.

Traditionally, GHGs and other global warming pollutants are perceived as solely global in their impacts and that increasing emissions anywhere in the world contributes to climate change anywhere in the world. A study conducted on the health impacts of CO₂ “domes” that form over urban areas cause increases in local temperatures and local criteria pollutants, which have adverse health effects.¹⁸

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 CO₂ 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 timeframe. As a result, the South Coast AQMD's current position is to evaluate the effects of GHGs over a longer timeframe than a single day (i.e., annual emissions). GHG emissions are typically considered to be cumulative impacts because they contribute to global climate effects.

Since GHG impacts are defined on an annual, instead of a peak daily basis, the GHG emissions for construction were quantified by summing all of the GHGs occurring during construction for ~~54-59~~ domes and ~~eight-24~~ additional seal installations which should be completed by December 31, 2038 and then amortizing the total construction GHGs over 30 years.

The South Coast AQMD convened a “Greenhouse Gas CEQA Significance Threshold Working Group” to consider a variety of benchmarks and potential significant thresholds to evaluate GHG impacts. On December 5, 2008, the South Coast AQMD adopted an interim CEQA GHG Significance Threshold for projects where the South Coast AQMD is the lead agency (South Coast AQMD 2008). This GHG interim threshold is set at 10,000 metric tons (MT) of CO₂ equivalent emissions (CO₂eq) per year. Projects with incremental increases below this threshold will not be

¹⁸ Jacobsen, Mark Z. Environmental Protection Agency Hearing on California Waiver: “Effects of Local CO₂ Domes and of Global CO₂ Changes on California's Air Pollution and Health,” March 5, 2009.
<https://web.stanford.edu/group/efmh/jacobson/PDFfiles/0903EPACalif.pdf>

cumulatively considerable. GHG impacts from the implementation of the proposed project were calculated at the project-specific level during construction activities.

PAR 1178 involves construction activities associated with installing domes and additional seals on existing storage tanks which rely on construction equipment that emit GHGs when in use. Once construction is completed, PAR 1178 does not have any requirements that would generate GHGs during operation of the storage tanks. Table 2-3 summarizes the GHG analysis which shows that the proposed project may result in the generation of ~~215~~229 MT per year of CO₂eq from construction activities, which is less than the South Coast AQMD's air quality significance threshold for GHGs. Detailed calculations of project GHG emissions can be found in Appendix B.

Table 2-3
Summary of GHG Emissions from Affected Facilities

Construction Activity	CO₂eq Emissions (MT/yr)
Doming 1 External Floating Roof Tank	116
Installing Additional Roof Seals for 1 Tank	25
Doming 54<u>59</u> External Roof Tanks and Installing Additional Roof Seals for 824 Internal Floating Roof Tanks	216 <u>248</u>
Significance Threshold	10,000
Significant?	No

Note: 1 metric ton = 2,205 pounds. GHGs from short-term construction activities are amortized over 30 years.

As shown in Table 2-3, the South Coast AQMD air quality significance threshold for GHGs would not be exceeded. For this reason, implementing the proposed project would not be expected to generate significant adverse cumulative GHG air quality impacts. Further, as noted in Section III. a), implementation of the proposed project would not be expected to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing criteria pollutants and the same is true for GHG emissions since the quantity of increased GHG emissions is at less than significant levels. Since significant air quality impacts were not identified for GHGs, no mitigation measures are necessary or required.

Conclusion

Based upon these considerations, significant air quality and GHG emissions impacts are not expected from implementing the proposed project. 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
IV. <u>BIOLOGICAL RESOURCES.</u>				
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 Section 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

PAR 1178 applies to ~~1,093~~ ~~1,059~~ storage tanks located at ~~30~~ ~~27~~ facilities including refineries, bulk storage, loading, and oil production facilities. However, only ~~54~~ ~~59~~ tanks at ~~eight~~ ~~nine~~ facilities will need to be domed and ~~eight~~ ~~24~~ tanks at ~~seven~~ ~~nine~~ facilities will need additional roof seals installed. PAR 1178 is estimated to reduce VOC emissions by 0.82 ton per day. The components of PAR 1178 that would be expected to have physical effects are installing domes on external floating roof tanks and additional roof seals on internal floating roof tanks. Incorporating advanced leak detection technologies, and updating maintenance, recordkeeping, and reporting requirements are not expected to create any secondary adverse environmental impacts.

IV. a), b), c), & d) No Impact. Implementation of PAR 1178 would occur at existing affected facilities, which are located in industrial areas. Additionally, the physical improvements are expected to occur within the existing facility property boundaries which have been previously disturbed. Thus, PAR 1178 is not expected to adversely affect in any way habitats that support riparian habitat, federally protected wetlands, or migratory corridors. Similarly, 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 on or in close proximity to affected facilities. Therefore, PAR 1178 would have no direct or indirect impacts that could adversely affect plant or animal species or the habitats on which they rely. PAR 1178 does not require the acquisition of additional land or further conversions of riparian habitats or sensitive natural communities where endangered or sensitive species may be found. In addition, any construction from the implementation of PAR 1178 would take place at the existing facilities and would not occur on or near a wetland or in the path of migratory species.

IV. e) & f) No Impact. The ~~30~~ ~~27~~ facilities subject to PAR 1178 are located throughout Los Angeles and San Bernardino counties. According to the California Department of Fish and Wildlife, Natural Community Conservation Plans (NCCP) Plan Summaries,¹⁹ there are no permitted NCCPs for Los Angeles and San Bernardino Counties, and the NCCPs in preparation do not involve areas which will be affected by the proposed project. Projects resulting in an air quality benefit: decreasing air pollutant emissions while not changing the type of pollutants emitted, will not conflict with any U.S. Department of Fish and Wildlife Habitat Conservation Plans (HCP). Thus, PAR 1178 would not be expected to conflict with any adopted NCCP, HCP, or any other relevant habitat conservation plan, and would not create divisions in any existing communities. The proposed project is also not expected to conflict with local policies or ordinances protecting biological resources or local, regional, or state conservation plans, because land use and

¹⁹ California Department of Fish and Wildlife, NCCP Plan Summaries, Accessed May 2023.
<https://wildlife.ca.gov/conservation/planning/nccp/plans>.

other planning considerations are determined by local governments and no land use or planning requirements would be altered by implementation of PAR 1178.

Conclusion

Based upon these considerations, significant biological resource impacts are not expected from implementing the proposed project. 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
V. <u>CULTURAL AND TRIBAL CULTURAL RESOURCES.</u>				
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 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 pursuant to CEQA Guidelines Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074, as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is either:				
• Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Public Resources Code Section 5024.1(c)? (In applying the criteria set forth in Public Resources Code Section 5024.1(c), the lead agency shall consider the significance of the resource to a California Native American tribe.)	<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, or tribal cultural significance to a community or ethnic or social group or a California Native American tribe.
- Unique resources or objects with cultural value to a California Native American tribe are present that could be disturbed by construction of the proposed project.
- The project would disturb human remains.

Discussion

PAR 1178 applies to ~~1,093~~ ~~1,059~~ storage tanks located at ~~30~~ ~~27~~ facilities including refineries, bulk storage, loading, and oil production facilities. However, only ~~54~~ ~~59~~ tanks at ~~eight~~ ~~nine~~ facilities will need to be domed and ~~eight~~ ~~24~~ tanks at ~~seven~~ ~~nine~~ facilities will need additional roof seals installed. PAR 1178 is estimated to reduce VOC emissions by 0.82 ton per day. The components of PAR 1178 that would be expected to have physical effects are installing domes on external floating roof tanks and additional roof seals on internal floating roof tanks. Incorporating advanced leak detection technologies, and updating maintenance, recordkeeping, and reporting requirements are not expected to create any secondary adverse environmental impacts.

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 represent the work of an important creative individual, or possesses high artistic values;
- Has yielded or may likely to yield information important in prehistory or history (CEQA Guidelines Section 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. Buildings or structures that may be affected by PAR 1178 are used for industrial purposes and would generally not be considered to be 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. Therefore, PAR 1178 is not expected to cause any impacts to significant historic cultural resources.

V. b), c), & d) No Impact. Construction-related activities associated with installing domes and additional roof seals on existing storage tanks are expected to be confined within the affected existing industrial facility boundaries and will occur aboveground. In addition, as mentioned in section V. a) the existing storage tanks subject to PAR 1178 are considered heavy industrial equipment and as such, are not unique resources or identified as having any cultural or tribal importance. Thus, PAR 1178 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, PAR 1178 has no potential to cause a substantial adverse change to a historical or archaeological resource, directly or indirectly to destroy a unique paleontological resource or site or unique geologic feature, or to disturb any human remains, including those interred outside formal cemeteries. Implementing PAR 1178 is, therefore, not anticipated to result in any activities or promote any programs that could have a significant adverse impact on cultural resources.

PAR 1178 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, PAR 1178 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. Similarly, PAR 1178 is not expected to result in a physical change to a resource determined by the South Coast AQMD to be significant to any tribe. For these reasons, PAR 1178 is not expected to cause any substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074.

As part of releasing this CEQA document for public review and comment, the South Coast AQMD 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 Section 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 South Coast AQMD will initiate a consultation with the Tribe within 30 days of receiving the request in accordance with Public Resources Code Section 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 Section 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 Section 21080.3.2(b)(1)-(2) and Section 21080.3.1(b)(1)].

Conclusion

Based upon these considerations, significant adverse cultural and tribal cultural resources impacts are not expected from implementing the proposed project. Since no significant cultural and tribal 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
VI. ENERGY. Would the project:				
a) Conflict with or obstruct adopted energy conservation plans, a state or local plan for renewable energy, or energy efficiency?	<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 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"/>
f) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Require or result in the relocation or construction of new or expanded electric power, natural gas or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance Criteria

Impacts to energy 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 energy resources in a wasteful and/or inefficient manner.

Discussion

PAR 1178 applies to ~~1,093~~ ~~1,059~~ storage tanks located at ~~30~~ ~~27~~ facilities including refineries, bulk storage, loading, and oil production facilities. However, only ~~54~~ ~~59~~ tanks at ~~eight~~ ~~nine~~ facilities will need to be domed and ~~eight~~ ~~24~~ tanks at ~~seven~~ ~~nine~~ facilities will need additional roof seals installed. PAR 1178 is estimated to reduce VOC emissions by 0.82 ton per day. The components of PAR 1178 that would be expected to have physical effects are installing domes on external floating roof tanks and additional roof seals on internal floating roof tanks. Incorporating advanced leak detection technologies, and updating maintenance, recordkeeping, and reporting requirements are not expected to create any secondary adverse environmental impacts.

VI. a), e) f) & g) No Impact. The proposed project is not expected to conflict with any adopted energy conservation plans or violate any energy conservation standards because existing facilities would be expected to continue implementing any existing energy conservation plans that are currently in place regardless of whether the proposed project is implemented. The effects of implementing PAR 1178 would apply to existing facilities. Any energy resources that may be necessary to dome external floating roof tanks, install additional roof seals on internal floating roof tanks, and incorporate additional OGI technology would be used to achieve reductions in VOC; and therefore, would not be using non-renewable resources in a wasteful manner. For these reasons, the proposed project is not expected to conflict with energy conservation plans or existing energy standards, or use non-renewable resources in a wasteful manner. In addition, the construction and operation of domes is not expected to rely on electric power, natural gas or telecommunication facilities, as such PAR 1178 will not cause the relocation or construction of new or expanded electric power, natural gas or telecommunication facilities. Therefore, no impacts are expected.

VI. b), c), & d) Less Than Significant Impact.

Fuel Usage during Construction

Implementation of the proposed project would result in the installation of domes, roof seals, and OGI technology. To accomplish these activities, use of energy in terms of gasoline and diesel fuel would be needed for on-road passenger vehicles and heavy duty trucks associated with delivering supplies and construction materials, and off-road construction equipment, respectively. While construction under the proposed project is expected to be spaced out across multiple years until December 31, 2038, to estimate worst-case energy impacts associated with construction activities, South Coast AQMD staff estimated the total gasoline and diesel fuel consumption for doming ~~54~~ ~~59~~ external floating roof tanks and installing additional roof seals for ~~eight~~ ~~24~~ tanks at ~~seven~~ ~~nine~~ facilities all occurring in one year. Each project is estimated to require 10 worker trips and one material delivery trip per day, with doming requiring one crane, three welders, and one air compressor, each for 10 hours per day and 96 days for completion (six days per week for 16 weeks); and installation of additional seals requiring one crane four hours per day and one air compressor five hours per day and 40 days for completion (5 days per week for 8 weeks).

On-road passenger vehicles were modelled as gasoline passenger cars (LDA) and light-duty trucks (LDT1 and LDT2) traveling 40 miles per day, and heavy duty trucks associated with delivering supplies and construction materials were modelled as diesel Tier 7 CA International Registration Plan Trucks (T7 CAIRP) travelling 50 miles per day. Fuel use was estimated using EMFAC2021 version 1.0.2 for calendar year 2026. Fuel use for offroad equipment was estimated using equipment specifications from CalEEMod version 2022.1.1.3 and OFFROAD2021 version 1.0.3. Table 2-4 summarizes the projected fuel use impacts associated with construction activities and

compares it to the gasoline and diesel consumption rates in the South Coast AQMD jurisdiction, for 2017. Detailed fuel use calculations can be found in Appendix B.

**Table 2-4
Annual Total Projected Fuel Usage for Construction Activities**

	Diesel	Gasoline
Projected Construction Energy Use (gal/yr)	163,830 <u>187,050</u>	8,144 <u>9,802</u>
Year 2017 South Coast AQMD Jurisdiction Estimated Fuel Demand (gal/yr)	775,000,000	7,086,000,000
Total Increase Above Baseline	0.02114 <u>0.02414%</u>	0.000115 <u>0.000138%</u>
Significance Threshold	1%	1%
Significant?	No	No

Based on the foregoing analyses, the construction-related activities associated with the implementation of the proposed project would not use energy in a wasteful manner, would not result in substantial depletion of existing energy resource supplies, or create a significant demand of energy when compared to existing supplies. Thus, there are no significant adverse energy impacts associated with the implementation of PAR 1178.

Conclusion

Based upon these considerations, significant adverse energy impacts are not expected from implementing the proposed project. 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
VII. <u>GEOLOGY AND SOILS.</u> Would the project:				
a) Directly or indirectly cause 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"/>
• 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"/>
• Landslides?	<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 direct or indirect 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"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	<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.
- Unique paleontological resources or sites or unique geologic features are present that could be directly or indirectly destroyed by the proposed project.

Discussion

PAR 1178 applies to ~~1,093~~ ~~1,059~~ storage tanks located at ~~30~~ ~~27~~ facilities including refineries, bulk storage, loading, and oil production facilities. However, only ~~54~~ ~~59~~ tanks at ~~eight~~ ~~nine~~ facilities will need to be domed and ~~eight~~ ~~24~~ tanks at ~~seven~~ ~~nine~~ facilities will need additional roof seals installed. PAR 1178 is estimated to reduce VOC emissions by 0.82 ton per day. The components of PAR 1178 that would be expected to have physical effects are installing domes on external floating roof tanks and additional roof seals on internal floating roof tanks. Incorporating advanced leak detection technologies, and updating maintenance, recordkeeping, and reporting requirements are not expected to create any secondary adverse environmental impacts.

VII. a), b), c), d), e), f) No Impact. The proposed project involves constructing new domes and installing roof tank seals on existing storage tanks located in already developed industrial settings and these activities would occur aboveground and as such, would not require any grading or site preparation activities.. Therefore, the proposed project is not expected to adversely affect geophysical conditions in the South Coast AQMD.

Southern California is an area of known seismic activity. 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. The Uniform Building Code requirements also consider liquefaction potential and establish stringent requirements for building foundations in areas potentially subject to liquefaction. The proposed project will not require the modification of existing structures at existing facilities in a manner that would not conform to the Uniform Building Code or any other state and local building codes. Structures must be designed to comply with the Uniform Building Code Zone 4 requirements if they are located in a seismically active area. The Uniform Building Code is considered to be a standard safeguard against major structural failures and loss of life. Thus, 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.

Physical modifications as a result of the proposed project are limited to retrofitting existing aboveground storage tanks and require no grading activities or soil disturbance that would create any issues with erosion. For this reason, no unstable earth conditions or changes in geologic substructures are expected to result from implementing the proposed project and therefore, no impacts to the loss of topsoil or soil erosion will occur. Further, since soil at existing facilities will not be disturbed, it will not be made further susceptible to expansion or liquefaction. Further, the proposed project will not create any new conditions that would cause subsidence landslides, or alter unique geologic features at any of the facilities. Thus, the proposed project would not be expected to increase or exacerbate any existing risks associated with soils at any facility. Implementation of the proposed project would not involve re-locating facilities on a geologic unit or soil that is unstable or that would become unstable as a result of the project; therefore, it would not be expected to potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. No impacts are anticipated.

The proposed project would not require the installation of septic tanks or other alternative wastewater disposal systems. Therefore, no persons or property would be exposed to new impacts related to expansive soils or soils incapable of supporting water disposal. Thus, the implementation of the proposed project would not adversely affect soils associated with the installation of a new septic system or alternative wastewater disposal system or modification of an existing sewer.

The proposed project does not cause or require the construction of any new facilities. No previously undisturbed land that may contain a unique paleontological resource or site or unique geological feature would be affected. Therefore, the proposed project is not expected to directly or indirectly destroy a unique paleontological resource or site or unique geological feature.

Conclusion

Based upon these considerations, significant adverse geology and soils impacts are not expected from the implementation of the proposed project. Since no significant geology and soils impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or 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 and accident 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 Section 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 airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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) 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

PAR 1178 applies to 1,059 storage tanks located at ~~30~~ 27 facilities including refineries, bulk storage, loading, and oil production facilities. However, only ~~54~~ 59 tanks at ~~eight~~ nine facilities will need to be domed and ~~eight~~ 24 tanks at ~~seven~~ nine facilities will need additional roof seals installed. PAR 1178 is estimated to reduce VOC emissions by 0.82 ton per day. The components of PAR 1178 that would be expected to have physical effects are installing domes on external floating roof tanks and additional roof seals on internal floating roof tanks. Incorporating advanced leak detection technologies, and updating maintenance, recordkeeping, and reporting requirements are not expected to create any secondary adverse environmental impacts.

VIII. a), b) & c) No Impact. While the proposed project will result in construction at affected facilities, doming external floating roof tanks, installing additional roof seals on internal floating roof tanks, and incorporating additional OGI technology will not require use or disposal of hazardous materials. Implementation of the proposed project is not expected to affect operations pertaining to hazardous materials, such as the processing of petroleum; thus, there will be no increase in nor creation of: a) significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; b) significant hazard to the public or the environment in the event of upset or accident conditions involving the release of hazardous materials from these storage tanks into the environment; or c) hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school if an existing facility happens to be located near an existing or proposed school.

VIII. d) No Impact. Government Code Section 65962.5 refers to hazardous waste handling practices at facilities subject to the Resources Conservation and Recovery Act (RCRA). Implementation of the proposed project is not expected to affect operations pertaining to hazardous materials, such as the processing of petroleum; thus, there will be no increase in or creation of a new significant hazard to the public or the environment if an existing facility happens to be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

VIII. e) Less than Significant Impact. Federal Aviation Administration regulation, 14 CFR Part 77 – Safe, Efficient Use and Preservation of the Navigable Airspace, provide information regarding the types of projects that may affect navigable airspace. Projects may adversely affect navigable airspace if they involve construction or alteration of structures greater than 200 feet above ground level within a specified distance from the nearest runway or objects within 20,000 feet of an airport or seaplane base with at least one runway more than 3,200 feet in length and the object would exceed a slope of 100:1 horizontally (100 feet horizontally for each one foot vertically from the nearest point of the runway). There are four facilities located within two miles

of an airport that may involve construction activities associated with installing domes and roof tank seals on existing storage tanks, but none are taller than 200 feet aboveground. However, these facilities have other heavy industrial equipment that will not be affected by PAR 1178 but that are much taller than the existing storage tanks. Thus, for the facilities located near a runway or an airport, the facility operators will already have safety protocols and procedures in place for alerting the Federal Aviation Administration of any potential changes involving equipment greater than 200 feet above ground level. Thus, implementation of PAR 1178 is not expected to interfere with navigable airspace or affect existing operations pertaining to hazardous materials, such as the processing of petroleum. Finally, PAR 1178 does not contain any requirements that would interfere with any applicable design code or regulation the Federal Aviation Administration may have in effect for safety reasons. Thus, there will be no significant increase in existing safety hazards or the creation of new safety hazards to peoples working or residing in the vicinity of public/private airports. See Appendix C for list of affected facilities located within two miles of an airport.

VIII. f) No Impact. Health and Safety Code Section 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 the implementation of, or physically interfere with any adopted emergency response plans or emergency evacuation plans that may be in place at existing facilities.

VIII. g) No Impact. 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 the potential risk of upset. The proposed project would not change the existing requirements and permit conditions for the proper handling of flammable materials.

Conclusion

Based upon these considerations, significant adverse hazards and hazardous materials impacts are not expected from implementing the proposed project. 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
IX. <u>HYDROLOGY AND WATER QUALITY.</u> Would the project:				
a) Violate any water quality standards, waste discharge requirements, or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<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 the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
• Result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• 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"/>
• Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<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
f) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, facilities or new storm water drainage facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) 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

PAR 1178 applies to ~~1,093~~ ~~1,059~~ storage tanks located at ~~30~~ ~~27~~ facilities including refineries, bulk storage, loading, and oil production facilities. However, only ~~54~~ ~~59~~ tanks at ~~eight~~ ~~nine~~ facilities will need to be domed and ~~eight~~ ~~24~~ tanks at ~~seven~~ ~~nine~~ facilities will need additional roof seals installed. PAR 1178 is estimated to reduce VOC emissions by 0.82 ton per day. The components of PAR 1178 that would be expected to have physical effects are installing domes on external floating roof tanks and additional roof seals on internal floating roof tanks. Incorporating advanced leak detection technologies, and updating maintenance, recordkeeping, and reporting requirements are not expected to create any secondary adverse environmental impacts.

IX. a), b), e), f), g) & h) No Impact. Implementation of PAR 1178 would require construction activities associated with installing domes on existing external floating roof tanks and installing additional roof seals on existing internal floating roof tanks. These activities might first require storage tanks to be emptied and degassed if other repairs are needed, but those steps already occur as part of regular tank inspections, and not because of PAR 1178.

PAR 1178 subparagraph (d)(5)(E) specifies that the timing of construction should be coordinated and coincide with when the storage tank is next emptied or degassed when installing additional roof seals on internal floating roof tanks. For these reasons, storage tank emptying and degassing activities are not considered unique to PAR 1178 and as such, the environmental impacts from these activities are excluded from the analysis of construction activities. It is important to note that dome suppliers and affected facilities say that a storage tank does not need to be emptied and degassed in order to install domes and roof seals, unless the tank shell is in need of reinforcement and repairs that involve welding. Further, if a storage tank is emptied and degassed, water is not required for this process so no increase in water demand is expected. In addition, PAR 1178 does not contain any requirements that would require the use of water during construction or operation. Further, since water is not needed to implement PAR 1178, no wastewater would be expected to be generated and. Since no wastewater is generated and no increase in water demand is created from the proposed project, the proposed project would not be expected to: 1) violate any water quality standards, waste discharge requirements of the applicable Regional Water Quality Control Board, or otherwise substantially degrade surface or ground water quality; 2) require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, facilities or new storm water drainage facilities; 3) substantially decrease groundwater supplies or interfere substantially with groundwater recharge or impede sustainable groundwater management of the basin; 4) conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan; 5) impact the water supply available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years; and 6) give cause for the wastewater treatment provider to question or evaluate whether adequate wastewater capacity exists in addition to the provider's existing commitments.

Conclusion

Based upon these considerations, significant adverse hydrology and water quality impacts are not expected from implementing the proposed project. 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
X. <u>LAND USE AND PLANNING.</u>				
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

PAR 1178 applies to 1,093 ~~1,059~~ storage tanks located at 30 ~~27~~ facilities including refineries, bulk storage, loading, and oil production facilities. However, only 54 ~~59~~ tanks at eight ~~nine~~ facilities will need to be domed and eight ~~24~~ tanks at seven ~~nine~~ facilities will need additional roof seals installed. PAR 1178 is estimated to reduce VOC emissions by 0.82 ton per day. The components of PAR 1178 that would be expected to have physical effects are installing domes on external floating roof tanks and additional roof seals on internal floating roof tanks. Incorporating advanced leak detection technologies, and updating maintenance, recordkeeping, and reporting requirements are not expected to create any secondary adverse environmental impacts.

X. a) & b) No Impact. The proposed project does not require the construction of new facilities, and the physical effects that would result from the proposed project would occur at existing facilities located in industrial areas and would occur within existing facility boundaries. For this reason, implementation of PAR 1178 is not expected to physically divide an established community. Therefore, no impacts are anticipated.

Further, land use and other planning considerations are determined by local governments and the proposed project does not alter any land use or planning requirements. Compliance with the proposed project would apply to existing storage tanks operating within the boundary of existing facilities. Thus, the proposed project would not be expected to affect or 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.

Conclusion

Based upon these considerations, significant adverse land use and planning impacts are not expected from implementing the proposed project. 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
XI. <u>MINERAL RESOURCES.</u> 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

PAR 1178 applies to ~~1,093~~ ~~1,059~~ storage tanks located at ~~30~~ ~~27~~ facilities including refineries, bulk storage, loading, and oil production facilities. However, only ~~54~~ ~~59~~ tanks at ~~eight~~ ~~nine~~ facilities will need to be domed and ~~eight~~ ~~24~~ tanks at ~~seven~~ ~~nine~~ facilities will need additional roof seals installed. PAR 1178 is estimated to reduce VOC emissions by 0.82 ton per day. The components of PAR 1178 that would be expected to have physical effects are installing domes on external floating roof tanks and additional roof seals on internal floating roof tanks. Incorporating advanced leak detection technologies, and updating maintenance, recordkeeping, and reporting requirements are not expected to create any secondary adverse environmental impacts.

XI. a) & b) No Impact. 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 plant or other land use plant. Some examples of mineral resources are gravel, asphalt, bauxite, and gypsum, which are commonly used for construction activities or industrial processes. Implementation of the proposed project would result in the installation of domes and roof seals; all of which have no effect on the use of minerals, such as those described above. Therefore, no new demand on mineral resources is expected to occur and no significant adverse mineral resources impacts from implementing the proposed project are anticipated.

Conclusion

Based upon these considerations, significant adverse mineral resource impacts are not expected from implementing the proposed project. Since no significant mineral 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
XII. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project 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 checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or 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, 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

PAR 1178 applies to ~~1,093~~ ~~1,059~~ storage tanks located at ~~30~~ ~~27~~ facilities including refineries, bulk storage, loading, and oil production facilities. However, only ~~54~~ ~~59~~ tanks at ~~eight~~ ~~nine~~ facilities will need to be domed and ~~eight~~ ~~24~~ tanks at ~~seven~~ ~~nine~~ facilities will need additional roof seals installed. PAR 1178 is estimated to reduce VOC emissions by 0.82 ton per day. The components of PAR 1178 that would be expected to have physical effects are installing domes on external floating roof tanks and additional roof seals on internal floating roof tanks. Incorporating advanced leak detection technologies, and updating maintenance, recordkeeping, and reporting requirements are not expected to create any secondary adverse environmental impacts.

XII. a) & b) Less than Significant Impact. The facilities subject to PAR 1178 are located in urbanized industrial areas. The existing noise environment at each of the facilities is typically dominated by noise from existing equipment on-site, vehicular traffic around the facilities, and trucks entering and existing facility premises. Large, potentially noise-intensive construction

equipment may be needed temporarily to dome external floating roof tanks and install additional roof seals on internal floating roof tanks. Operation of the construction equipment would be expected to comply with all existing noise control laws and ordinances. Since all of the facilities are located in heavy industrial areas, which have a higher background noise level when compared to other areas, the noise generated during construction would likely be indistinguishable from the background noise levels at the property line. Further, Occupational Safety and Health Administration (OSHA) and California-OSHA have established noise standards to protect worker health both indoors and outdoors. Furthermore, compliance with local noise ordinances typically limit the hours of construction to reduce the temporary noise impacts from construction to sensitive and offsite receptors. These potential noise increases would only be temporary until construction is completed and would be expected to be within the allowable noise levels established by the local noise ordinances for industrial areas; thus, impacts are expected to be less than significant.

XII. c) No Impact. As stated in Section VIII e), ~~four~~ five facilities identified in Appendix C are located within two miles of an airport. The existing noise environment at this facility is dominated by noise from existing equipment on-site, vehicular traffic around the facilities, and trucks entering and exiting facility premises. Thus, any new noise impacts from temporary construction activities would be likely to generate noise that is indistinguishable from the background levels at the property line. Thus, PAR 1178 is not expected to expose persons residing or working within two miles of a public airport or private airstrip to excessive noise levels.

Conclusion

Based upon these considerations, significant adverse noise impacts are not expected from the implementing the proposed project. 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
XIII. <u>POPULATION AND HOUSING.</u>				
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

PAR 1178 applies to ~~1,093~~ ~~1,059~~ storage tanks located at ~~30~~ ~~27~~ facilities including refineries, bulk storage, loading, and oil production facilities. However, only ~~54~~ ~~59~~ tanks at ~~eight~~ ~~nine~~ facilities will need to be domed and ~~eight~~ ~~24~~ tanks at ~~seven~~ ~~nine~~ facilities will need additional roof seals installed. PAR 1178 is estimated to reduce VOC emissions by 0.82 ton per day. The components of PAR 1178 that would be expected to have physical effects are installing domes on external floating roof tanks and additional roof seals on internal floating roof tanks. Incorporating advanced leak detection technologies, and updating maintenance, recordkeeping, and reporting requirements are not expected to create any secondary adverse environmental impacts.

XIII. a) No Impact. The construction activities associated with the proposed project are not expected to involve the relocation of individuals, require new housing or commercial facilities, or change the distribution of the population. Approximately 10 construction workers per facility may be needed to perform construction activities to comply with PAR 1178, and these workers can be supplied from the existing labor pool in the local Southern California area. The proposed project is not expected to affect day-to-day operations. As such, PAR 1178 is not anticipated to cause change in population densities, population distribution, or induce significant growth in population.

XIII. b) No Impact. The proposed project would result in construction activities that are expected to occur within the confines of existing facilities, and would not be expected to substantially alter existing operations. Consequently, PAR 1178 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 persons or housing elsewhere within the South Coast AQMD’s jurisdiction.

Conclusion

Based upon these considerations, significant adverse population and housing impacts are not expected from implementing the proposed project. 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
XIV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental 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 construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response time, or other performance objectives.

Discussion

PAR 1178 applies to ~~1,093~~ ~~4,059~~ storage tanks located at ~~30~~ ~~27~~ facilities including refineries, bulk storage, loading, and oil production facilities. However, only ~~54~~ ~~59~~ tanks at ~~eight~~ ~~nine~~ facilities will need to be domed and ~~eight~~ ~~24~~ tanks at ~~seven~~ ~~nine~~ facilities will need additional roof seals installed. PAR 1178 is estimated to reduce VOC emissions by 0.82 ton per day. The components of PAR 1178 that would be expected to have physical effects are installing domes on external floating roof tanks and additional roof seals on internal floating roof tanks. Incorporating advanced leak detection technologies, and updating maintenance, recordkeeping, and reporting requirements are not expected to create any secondary adverse environmental impacts.

XIV. a) & b) No Impact. Implementation of PAR 1178 would require construction activities associated with installing domes on existing external floating roof tanks and installing additional roof seals on existing internal floating roof tanks. If other repairs to the storage tanks need to be made, then these activities may require storage tanks to first be emptied and degassed, but those steps occur as part of regular tank inspection. As such, no special circumstances with handling sensitive materials during construction would be expected. For these reasons, new safety hazards are not expected to occur during construction, and implementation of PAR 1178 is not expected to substantially alter or increase the need or demand for additional public services (e.g., fire and

police departments and related emergency services, etc.) above current levels. No significant impact to these existing services is anticipated.

XIV. c), d), & e) No Impact. As explained in Section XIII. a), PAR 1178 is not anticipated to generate any significant effects, either direct or indirect, on the population or population distribution within South Coast AQMD’s jurisdiction as no permanent additional workers are anticipated to be required for compliance. Because PAR 1178 is not expected to induce substantial population growth in any way, and because the local labor pool (e.g., workforce) would remain the same since PAR 1178 would not trigger changes to current usage practices, no additional schools would need to be constructed. The analysis assumes that 10 construction workers per facility may be needed but any construction activities would be temporary and be expected to be supplied from the existing labor pool in the local Southern California area. There would be no corresponding impacts to local schools or parks, and there would be no corresponding need for new or physically altered public facilities in order to maintain acceptable service ratios, response times, or other performance objectives. Therefore, no impacts would be expected to schools, parks or other public facilities.

Conclusion

Based upon these considerations, significant adverse public services impacts are not expected from implementing the proposed project. 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
XV. RECREATION.				
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

PAR 1178 applies to ~~1,093~~ ~~4,059~~ storage tanks located at ~~30~~ ~~27~~ facilities including refineries, bulk storage, loading, and oil production facilities. However, only ~~54~~ ~~59~~ tanks at ~~eight~~ ~~nine~~ facilities will need to be domed and ~~eight~~ ~~24~~ tanks at ~~seven~~ ~~nine~~ facilities will need additional roof seals installed. PAR 1178 is estimated to reduce VOC emissions by 0.82 ton per day. The components of PAR 1178 that would be expected to have physical effects are installing domes on external floating roof tanks and additional roof seals on internal floating roof tanks. Incorporating advanced leak detection technologies, and updating maintenance, recordkeeping, and reporting requirements are not expected to create any secondary adverse environmental impacts.

XV. a) & b) No Impact. As previously explained in Section XIII – Population and Housing, the proposed project is not expected to affect population growth or distribution within the South Coast AQMD’s jurisdiction because only about 10 construction workers per facility will be needed to dome external floating roof tanks, install additional roof seals on internal floating roof tanks, and incorporate additional OGI technology for compliance with the proposed project can be supplied by the existing labor pool in the local Southern California area. As such, the proposed project is not anticipated to generate any significant adverse effects, either indirectly or directly on population growth within the South Coast AQMD’s jurisdiction or population distribution, and thus no additional demand for recreational facilities would be necessary or expected. No requirements in the proposed project would be expected to affect recreation in any way. Therefore, 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.

Conclusion

Based upon these considerations, significant adverse recreation impacts are not expected from implementing the proposed project. Since no significant recreation impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
XVI. <u>SOLID AND HAZARDOUS WASTE.</u> 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

PAR 1178 applies to ~~1,093~~ ~~1,059~~ storage tanks located at ~~30~~ ~~27~~ facilities including refineries, bulk storage, loading, and oil production facilities. However, only ~~54~~ ~~59~~ tanks at ~~eight~~ ~~nine~~ facilities will need to be domed and ~~eight~~ ~~24~~ tanks at ~~seven~~ ~~nine~~ facilities will need additional roof seals installed. PAR 1178 is estimated to reduce VOC emissions by 0.82 ton per day. The components of PAR 1178 that would be expected to have physical effects are installing domes on external floating roof tanks and additional roof seals on internal floating roof tanks. Incorporating advanced leak detection technologies, and updating maintenance, recordkeeping, and reporting requirements are not expected to create any secondary adverse environmental impacts.

XVI. a) & b) No Impact. While the proposed project will involve doming of external floating roof tanks, installation of additional roof seals on internal floating roof tanks, and incorporation of additional OGI technology, construction will not require removal or replacement of existing equipment. Therefore, no solid construction waste would be generated that would need to be disposed of in a landfill, and the proposed project is not expected to impact existing permitted landfill capacity.

Current operations at facilities are assumed to comply with all applicable local, state, or federal waste disposal regulations, and PAR 1178 does not contain any provisions that would weaken, alter, or interfere with current practices. Thus, implementation of 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 in a manner that would cause a significant adverse solid and hazardous waste impact.

Conclusion

Based upon these considerations, significant adverse solid and hazardous waste impacts are not expected from implementing the proposed project. 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
XVII. TRANSPORTATION.				
Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or be inconsistent with CEQA Guidelines Section 15064.3(b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric 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"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance Criteria

Impacts on transportation will be considered significant if any of the following criteria apply:

- 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 or contributes to changes in overall vehicle miles traveled.
- There is an increase in vehicle miles traveled that is substantial in relation to the existing travel activity.
- 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

PAR 1178 applies to ~~1,093~~ ~~1,059~~ storage tanks located at ~~30~~ ~~27~~ facilities including refineries, bulk storage, loading, and oil production facilities. However, only ~~54~~ ~~59~~ tanks at ~~eight~~ ~~nine~~ facilities will need to be domed and ~~eight~~ ~~24~~ tanks at ~~seven~~ ~~nine~~ facilities will need additional roof seals installed. PAR 1178 is estimated to reduce VOC emissions by 0.82 ton per day. The components of PAR 1178 that would be expected to have physical effects are installing domes on external floating roof tanks and additional roof seals on internal floating roof tanks. Incorporating advanced leak detection technologies, and updating maintenance, recordkeeping, and reporting requirements are not expected to create any secondary adverse environmental impacts.

XVII. a) & b) Less than Significant Impact. As previously discussed in Section III – Air Quality and Greenhouse Gas Emissions, compliance with PAR 1178 would require construction activities

to dome external floating roof tanks, install additional roof seals on internal floating roof tanks, and incorporate additional OGI technology. To accomplish these various activities, on-road passenger vehicles and heavy duty trucks would be dispatched to the affected facilities in order to deliver supplies and construction materials.

Table 2-5 presents the number of vehicle round trips that may occur on a peak day which involves doming eight external floating roof tanks and installing additional roof seals for seven internal floating roof tanks.

**Table 2-5
Number of Round Trips in a Peak Day**

Activity	Vehicle Trips
Doming 8 External Floating Roof Tanks	8 Delivery Trucks 80 Passenger Autos
Installing Additional Roof Seals for 7 Internal Floating Roof Tanks	7 Delivery Trucks 70 Passenger Autos
Total in a Peak Day	165 Vehicle Trips

In accordance with the promulgation of SB 743 which requires analyses of transportation impacts in CEQA documents to consider a project's vehicle miles traveled (VMT) in lieu of applying a LOS metric when determining significance for transportation impacts, CEQA Guidelines Section 15064.3(b)(4) gives a lead agency to use discretion to choose the most appropriate methodology to evaluate a project's VMT, allowing the metric to be expressed as a change in absolute terms, per capita, per household, or in any other measure.

On a peak day, these construction activities are estimated to result in 15 heavy duty delivery truck round trips and 150 passenger auto round trips, the former which is less than the threshold of 350 truck round trips per day. The proposed project is not expected to result in the need of 350 new employees; assumptions, such as that installing additional roof seals for one internal floating roof tank requires 10 workers similar to doming an external roof tank is to overestimate impacts for a peak day. The proposed project is not expected to cause a significant adverse transportation impact. Therefore, the proposed project would not conflict with or be inconsistent with CEQA Guidelines Section 15064.3(b). Further, because implementation of the proposed project would not alter any transportation plans, the proposed project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

XVII. c) & d) No Impact. No existing roadways would need to be modified and no new roadways would need to be constructed as a result of the proposed project. Thus, there would be no change to current public roadway designs including a geometric design feature that could increase traffic hazards. Further, the proposed project is not expected to substantially increase traffic hazards or create incompatible uses at or adjacent to the facilities. Construction-related activities are expected to be temporary and occur over a short-term and were concluded to have no impact for these environmental checklist questions and the California Department of Transportation (CalTrans) submitted a comment letter (see Appendix D, Comment Letter #3) which concurs with the conclusion of no impact. However, CalTrans recommends that facilities implement a traffic control plan to minimize disruptions to traffic and ensure adequate emergency access in the event of traffic lane closure during construction (i.e., incorporating channelizing devices preceded by

approved warning signs). In addition, a CalTrans transportation permit is required in the event that oversized transport vehicles traveling on state highways are needed to deliver construction equipment and materials to the affected facilities. Regardless of whether or not a CalTrans transportation permit is required, CalTrans recommends that large size truck trips be limited to off-peak commute periods. In any case, any facility undergoing construction to implement PAR 1178 requirements will be subject to CalTrans requirements.

Since construction activities and associated passenger vehicle trips and delivery truck trips would cease after construction is completed, the proposed project is not expected to alter the existing long-term circulation patterns within the areas of each affected facility during construction. Thus, no long-term impacts on the traffic circulation system are expected to occur.

Further, impacts to existing emergency access at the affected facilities would also not be affected because PAR 1178 does not contain any requirements specific to emergency access points and each facility would be expected to continue to maintain their existing emergency access. As a result, PAR 1178 is not expected to result in inadequate emergency access.

Conclusion

Based upon these considerations, significant adverse transportation impacts are not expected from implementing the proposed project. Since no significant transportation impacts were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
XVIII. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildfires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance Criteria

A project’s ability to contribute to a wildfire will be considered significant if the project is located in or near state responsibility areas or lands classified as very high fire hazard severity zones, and any of the following conditions are met:

- The project would substantially impair an adopted emergency response plan or emergency evacuation plan.
- The project may exacerbate wildfire risks by exposing the project’s occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors.
- The project may exacerbate wildfire risks or may result in temporary or ongoing impacts to the environment because the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) are required.
- The project would expose people or structures to significant risks such as downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

- The project would expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildfires.

Discussion

PAR 1178 applies to ~~1,093~~ ~~1,059~~ storage tanks located at ~~30~~ ~~27~~ facilities including refineries, bulk storage, loading, and oil production facilities. However, only ~~54~~ ~~59~~ tanks at ~~eight~~ ~~nine~~ facilities will need to be domed and ~~eight~~ ~~24~~ tanks at ~~seven~~ ~~nine~~ facilities will need additional roof seals installed. PAR 1178 is estimated to reduce VOC emissions by 0.82 ton per day. The components of PAR 1178 that would be expected to have physical effects are installing domes on external floating roof tanks and additional roof seals on internal floating roof tanks. Incorporating advanced leak detection technologies, and updating maintenance, recordkeeping, and reporting requirements are not expected to create any secondary adverse environmental impacts.

XVIII. a), b), c), d) & e) No Impact. Implementation of the proposed project would neither require the construction of any new facilities nor result in the construction of any occupied buildings or structures beyond the current boundaries of each affected facility. Thus, PAR 1178 is not expected to substantially impair an adopted emergency response plan or emergency evacuation plan. Further, the existing facilities which are subject to PAR 1178 are located in industrial areas, and not near wildlands. In the event of a wildfire, no exacerbation of wildfire risks, and no consequential exposure of the project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, or other factors would be expected to occur. Similarly, the existing facilities which are subject to PAR 1178 are located in industrial areas and no new facilities are required to be constructed. Thus, PAR 1178 would neither expose people or structures to new significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes, nor would it expose people or structures, either directly or indirectly, to a new significant risk of loss, injury or death involving wildfires. Finally, because PAR 1178 does not require any construction beyond existing facility boundaries, the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment are not required.

Conclusion

Based upon these considerations, significant adverse wildfire risks are not expected from implementing the proposed project. Since no significant wildfire risks were identified, no mitigation measures are necessary or required.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
XIX. <u>MANDATORY FINDINGS OF SIGNIFICANCE.</u>				
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

PAR 1178 applies to ~~1,093~~ ~~1,059~~ storage tanks located at ~~30~~ ~~27~~ facilities including refineries, bulk storage, loading, and oil production facilities. However, only ~~54~~ ~~59~~ tanks at ~~eight~~ ~~nine~~ facilities will need to be domed and ~~eight~~ ~~24~~ tanks at ~~seven~~ ~~nine~~ facilities will need additional roof seals installed. PAR 1178 is estimated to reduce VOC emissions by 0.82 ton per day. The components of PAR 1178 that would be expected to have physical effects are installing domes on external floating roof tanks and additional roof seals on internal floating roof tanks. Incorporating advanced leak detection technologies, and updating maintenance, recordkeeping, and reporting requirements are not expected to create any secondary adverse environmental impacts.

XIX. a) No Impact. As explained in Section IV - Biological Resources, PAR 1178 is not expected to significantly adversely affect plant or animal species, or the habitat on which they rely because any construction and operational activities 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. For these reasons, PAR 1178 is not expected to reduce or eliminate any plant or animal species or destroy prehistoric records of the past.

XIX. b) Less Than Significant Impact. Based on the foregoing analyses, PAR 1178 would not result in significant adverse project-specific environmental impacts. Potential adverse impacts from implementing PAR 1178 would not be “cumulatively considerable” as defined by CEQA Guidelines Section 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 Section 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. South Coast AQMD 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 PAR 1178 for any environmental topic area.

XIX. c) Less Than Significant Impact. Based on the foregoing analyses, PAR 1178 is not expected to cause adverse effects on human beings for any environmental topic, either directly or indirectly because: 1) aesthetics impacts were determined to be less than significant as analyzed in Section I – Aesthetics; 2) the air quality and GHG impacts were determined to be less than the significance thresholds as analyzed in Section III – Air Quality and Greenhouse Gases; 3) energy impacts were determined to be less than significant as analyzed in Section VI – Energy; 4) the noise impacts were determined to be less than significant as analyzed in Section XII – Noise; and 5) transportation and traffic impacts were determined to be less than the significant as analyzed in Section XVII – Transportation. In addition, the analysis concluded that there would be no significant environmental impacts for the remaining environmental impact topic areas: agriculture and forestry resources, biological resources, cultural and tribal cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, solid and hazardous waste, transportation, and wildfire.

Conclusion

As previously discussed in environmental topics I through XIX, the proposed project has no potential to cause significant adverse environmental effects. Since no significance adverse environmental impacts were identified, no mitigation measures are necessary or required.

APPENDICES

Appendix A: Proposed Amended Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities

Appendix B: Modeling Files, Assumptions, and Calculations

Appendix C: List of Affected Facilities

Appendix D: Comment Letters Received on the Draft EA and Responses to Comments

APPENDIX A

Proposed Amended Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities

In order to save space and avoid repetition, please refer to the latest version of PAR 1178 located elsewhere in the Governing Board Agenda for the public hearing scheduled on September 1, 2023. The version of PAR 1178 that was circulated with the Draft EA for a 30-day public review and comment period from July 19, 2023 to August 18, 2023 was identified as the “Preliminary Draft Rule PAR 1178, revision date June 13, 2023,” which is available from the South Coast AQMD’s website at: <http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1178/initial-draft-rule-language.pdf>. An original hard copy of the Draft EA, which included the draft version of PAR 1178 listed above, can be obtained through the South Coast AQMD Public Information Center by phone at (909) 396-2001 or by email at PICrequests@aqmd.gov.

APPENDIX B

Modeling Files, Assumptions, and Calculations

The calculations originally presented in pages B-1 and B-59 of the Draft EA have been updated to include the installation of domes and additional seals for storage tanks located at three additional facilities. This appendix also includes the original pages with accompanying header-footer designations from the Draft EA with the updated calculations for the respective topics as follows:

- Peak Daily Construction Impacts by Construction Activity and Season (pp. B-1 to B-2);
- CalEEMod Modeling for Installation of Dome (pp. B-3 to B-21);
- CalEEMod Modeling for Installation of Additional Seals (pp. B-22 to B-59); and
- Fuel Use for Construction (pp. B-60 to B-61).

Peak Daily Construction Impacts by Construction Activity and Season (lb/day for Criteria Pollutants, MT/yr for GHG)

Doming 1 External Floating Roof Tank

	ROG	NOx	CO	SO ₂	PM10T	PM2.5T	CO ₂ e
Winter	0.90	8.41	11.20	0.02	0.67	0.40	
Summer	0.91	8.40	11.50	0.02	0.67	0.40	
Max	0.91	8.41	11.50	0.02	0.67	0.40	116

Installing Additional Roof Seals for 1 Internal Floating Roof Tank

	ROG	NOx	CO	SO ₂	PM10T	PM2.5T	CO ₂ e
Winter	0.33	3.03	4.55	0.01	0.44	0.18	24
Summer	0.34	3.01	4.81	0.01	0.44	0.18	25
Max	0.34	3.03	4.81	0.01	0.44	0.18	25

Doming 8 External Floating Roof Tanks and Installing Additional Roof Seals for 7 Internal Floating Roof Tanks

	ROG	NOx	CO	SO ₂	PM10T	PM2.5T
Max	9.66	88.49	125.67	0.23	8.44	4.46

Doming 59 External Floating Roof Tanks and Installing Additional Roof Seals for 24 Internal Floating Roof Tanks

CO₂e
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Peak Daily Construction Impacts by Construction Activity and Season (lb/day for Criteria Pollutants, MT/yr for GHG)

Doming 1 External Floating Roof Tank

	ROG	NOx	CO	SO ₂	PM10T	PM2.5T	CO ₂ e
Winter	0.90	8.41	11.20	0.02	0.67	0.40	
Summer	0.91	8.40	11.50	0.02	0.67	0.40	
Max	0.91	8.41	11.50	0.02	0.67	0.40	116

Installing Additional Roof Seals for 1 Internal Floating Roof Tank

	ROG	NOx	CO	SO ₂	PM10T	PM2.5T	CO ₂ e
Winter	0.33	3.03	4.55	0.01	0.44	0.18	24
Summer	0.34	3.01	4.81	0.01	0.44	0.18	25
Max	0.34	3.03	4.81	0.01	0.44	0.18	25

Doming 8 External Floating Roof Tanks and Installing Additional Roof Seals for 7 Internal Floating Roof Tanks

	ROG	NOx	CO	SO ₂	PM10T	PM2.5T
Max	9.66	88.49	125.67	0.23	8.44	4.46

Doming 54 External Floating Roof Tanks and Installing Additional Roof Seals for 8 Internal Floating Roof Tanks

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PAR 1178 - Dome Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	PAR 1178 - Dome
Construction Start Date	1/1/2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	Air District
Windspeed (m/s)	3.50
Precipitation (days)	16.0
Location	33.78242008132466, -118.2666105636882
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4641
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas
App Version	2022.1.1.14

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
General Heavy Industry	PAR 1178 PAR 1178	1000sqft	0.73	32,000 B-6 B-5	0.00	—	—	August 2023 July 2023

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.09	0.91	8.40	11.5	0.02	0.34	0.33	0.67	0.32	0.08	0.40	—	2,630	2,630	0.11	0.05	1.38	2,650
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.09	0.90	8.41	11.2	0.02	0.34	0.33	0.67	0.32	0.08	0.40	—	2,612	2,612	0.10	0.05	0.04	2,631
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.29	0.24	2.24	3.00	0.01	0.09	0.09	0.18	0.08	0.02	0.10	—	695	695	0.03	0.01	0.16	700
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.05	0.04	0.41	0.55	< 0.005	0.02	0.02	0.03	0.02	< 0.005	0.02	—	115	115	< 0.005	< 0.005	0.03	116

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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2026	1.09	0.91	8.40	11.5	0.02	0.34	0.33	0.67	0.32	0.08	0.40	—	2,630	2,630	0.11	0.05	1.38	2,650
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.09	0.90	8.41	11.2	0.02	0.34	0.33	0.67	0.32	0.08	0.40	—	2,612	2,612	0.10	0.05	0.04	2,631
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.29	0.24	2.24	3.00	0.01	0.09	0.09	0.18	0.08	0.02	0.10	—	695	695	0.03	0.01	0.16	700
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.05	0.04	0.41	0.55	< 0.005	0.02	0.02	0.03	0.02	< 0.005	0.02	—	115	115	< 0.005	< 0.005	0.03	116

3. Construction Emissions Details

3.1. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.02	0.86	8.14	10.1	0.02	0.34	—	0.34	0.31	—	0.31	—	2,172	2,172	0.09	0.02	—	2,180
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.02	0.86	8.14	10.1	0.02	0.34	—	0.34	0.31	—	0.31	—	2,172	2,172	0.09	0.02	—	2,180
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

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Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.27	0.23	2.16	2.69	0.01	0.09	—	0.09	0.08	—	0.08	—	577	577	0.02	< 0.005	—	579
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.39	0.49	< 0.005	0.02	—	0.02	0.02	—	0.02	—	95.6	95.6	< 0.005	< 0.005	—	95.9
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.08	1.31	0.00	0.00	0.28	0.28	0.00	0.07	0.07	—	290	290	0.01	0.01	0.99	294
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	< 0.005	0.18	0.06	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	167	167	0.01	0.03	0.38	176
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.09	1.05	0.00	0.00	0.28	0.28	0.00	0.07	0.07	—	273	273	< 0.005	0.01	0.03	276
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	< 0.005	0.19	0.06	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	167	167	0.01	0.03	0.01	175
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.02	0.29	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	73.7	73.7	< 0.005	< 0.005	0.11	74.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	44.4	44.4	< 0.005	0.01	0.04	46.6
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	12.2	12.2	< 0.005	< 0.005	0.02	12.3

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Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	7.35	7.35	< 0.005	< 0.005	0.01	7.72

4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	PAR 1178 PAR 1178	—	—	—	—	—	—	B-10 B-9	—	—	—	—	—	—	—	—	August 2023 July 2023

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Building Construction	Building Construction	1/1/2026	4/23/2026	6.00	97.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Building Construction	Cranes	Diesel	Average	1.00	10.0	367	0.29
Building Construction	Welders	Diesel	Average	3.00	10.0	82.0	0.20
Building Construction	Air Compressors	Diesel	Average	1.00	10.0	84.0	0.37

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5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Building Construction	—	—	—	—
Building Construction	Worker	10.0	40.0	LDA,LDT1,LDT2
Building Construction	Vendor	0.00	10.2	HHDT,MHDT
Building Construction	Hauling	1.00	50.0	HHDT
Building Construction	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
General Heavy Industry	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	690	0.05	0.01

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	5.07	annual days of extreme heat
Extreme Precipitation	4.20	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone PAR 1178	B-17.6
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AQ-PM	67.2
AQ-DPM	99.3
Drinking Water	42.4
Lead Risk Housing	91.8
Pesticides	0.00
Toxic Releases	97.1
Traffic	23.6
Effect Indicators	—
CleanUp Sites	71.7
Groundwater	76.2
Haz Waste Facilities/Generators	62.6
Impaired Water Bodies	0.00
Solid Waste	52.9
Sensitive Population	—
Asthma	83.0
Cardio-vascular	92.8
Low Birth Weights	72.9
Socioeconomic Factor Indicators	—
Education	99.6
Housing	58.2
Linguistic	97.3
Poverty	97.4
Unemployment	91.3

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Economic	—
Above Poverty	3.734120364
Employed	20.67239831
Median HI	8.109842166
Education	—
Bachelor's or higher	1.706659823
High school enrollment	20.74939048
Preschool enrollment	24.62466316
Transportation	—
Auto Access	9.085076351
Active commuting	86.1157449
Social	—
2-parent households	52.29051713
Voting	11.8311305
Neighborhood	—
Alcohol availability	4.516874118
Park access	81.35506224
Retail density	53.26575132
Supermarket access	94.25125112
Tree canopy	9.559861414
Housing	—
Homeownership	5.427948159
Housing habitability	2.361093289
Low-inc homeowner severe housing cost burden	14.65417683
Low-inc renter severe housing cost burden	73.7071731
Uncrowded housing	0.192480431

Insured adults	3.002694726
Arthritis	74.6
Asthma ER Admissions	21.3
High Blood Pressure	64.8
Cancer (excluding skin)	96.9
Asthma	13.4
Coronary Heart Disease	40.3
Chronic Obstructive Pulmonary Disease	22.0
Diagnosed Diabetes	11.9
Life Expectancy at Birth	10.9
Cognitively Disabled	46.5
Physically Disabled	63.7
Heart Attack ER Admissions	21.1
Mental Health Not Good	2.6
Chronic Kidney Disease	20.1
Obesity	3.6
Pedestrian Injuries	98.5
Physical Health Not Good	2.9
Stroke	29.9
Health Risk Behaviors	—
Binge Drinking	69.8
Current Smoker	4.4
No Leisure Time for Physical Activity	4.2
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0

Elderly	97.8
English Speaking	3.7
Foreign-born	92.7
Outdoor Workers	6.3
Climate Change Adaptive Capacity	—
Impervious Surface Cover	3.2
Traffic Density	49.8
Traffic Access	87.4
Other Indices	—
Hardship	99.2
Other Decision Support	—
2016 Voting	0.9

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	95.0
Healthy Places Index Score for Project Location (b)	6.00
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	Wilmington Long Beach Carson

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

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Health & Equity Evaluation Scorecard not completed.
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7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Source: Conversation Between PAR 1178 Rules Staff with Supplier
Construction: Off-Road Equipment	Source: (1 Crane, 3 Welders) Conversation Between PAR 1178 Rules Staff with Supplier, and (1 Crane, 1 Compressor) Dec 2001 Final EA for PAR 1178
Construction: Trips and VMT	Source: (6-10 Workers) Conversation Between PAR 1178 Rules Staff with Supplier, and (2 Crew/Tool Trucks Driving 40 Miles, 1 Material Delivery Truck Driving 50 Miles) Dec 2001 Final EA for PAR 1178
Characteristics: Project Details	Rule 1178 in the South Coast AQMD Jurisdiction

PAR 1178 - Seals Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	PAR 1178 - Seals
Construction Start Date	6/1/2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	Air District
Windspeed (m/s)	3.50
Precipitation (days)	16.0
Location	33.782633950840065, -118.26814130827408
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4640
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas
App Version	2022.1.1.14

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
General Heavy Industry	PAR 1178 PAR 1178	1000sqft	0.73	32,000 B-25 B-24	0.00	—	—	August 2023 July 2023

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.41	0.34	3.01	4.81	0.01	0.11	0.33	0.44	0.10	0.08	0.18	—	1,243	1,243	0.05	0.04	1.38	1,258
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.05	0.04	0.37	0.57	< 0.005	0.01	0.04	0.05	0.01	0.01	0.02	—	152	152	0.01	0.01	0.07	153
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.01	0.01	0.07	0.10	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	25.1	25.1	< 0.005	< 0.005	0.01	25.4

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.41	0.34	3.01	4.81	0.01	0.11	0.33	0.44	0.10	0.08	0.18	—	1,243	1,243	0.05	0.04	1.38	1,258
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.05	0.04	0.37	0.57	< 0.005	0.01	0.04	0.05	0.01	0.01	0.02	—	152	152	0.01	0.01	0.07	153
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.01	0.01	0.07	0.10	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	25.1	25.1	< 0.005	< 0.005	0.01	25.4

3. Construction Emissions Details

3.1. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.34	0.29	2.76	3.44	0.01	0.11	—	0.11	0.10	—	0.10	—	785	785	0.03	0.01	—	788
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.04	0.34	0.42	< 0.005	0.01	—	0.01	0.01	—	0.01	—	96.8	96.8	< 0.005	< 0.005	—	97.2
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	16.0	16.0	< 0.005	< 0.005	—	16.1

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Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.08	1.31	0.00	0.00	0.28	0.28	0.00	0.07	0.07	—	290	290	0.01	0.01	0.99	294	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Hauling	0.01	< 0.005	0.18	0.06	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	167	167	0.01	0.03	0.38	176	
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	0.01	0.01	0.01	0.14	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	34.2	34.2	< 0.005	< 0.005	0.05	34.6	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Hauling	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	20.6	20.6	< 0.005	< 0.005	0.02	21.6	
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.66	5.66	< 0.005	< 0.005	0.01	5.73	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.41	3.41	< 0.005	< 0.005	< 0.005	3.58	

4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
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PAR 1178									B-27							July 2023	

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Daily, Summer (Max)	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Total	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Daily, Winter (Max)	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Total	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Annual	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Total	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Total	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Daily, Winter (Max)	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Total	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Annual	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Total	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Building Construction	Building Construction	6/1/2026	8/1/2026	5.00	45.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Building Construction	Cranes	Diesel	Average	1.00	4.00	367	0.29
Building Construction	Air Compressors	Diesel	Average	1.00	8.00	84.0	0.37

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Building Construction	—	—	—	—
Building Construction	Worker	10.0	40.0	LDA,LDT1,LDT2
Building Construction	Vendor	0.00	10.2	HHDT,MHDT
Building Construction	Hauling	1.00	50.0	HHDT
Building Construction PAR 1178 PAR 1178	Onsite truck	—	B-31 B-30	HHDT August 2023 July 2023

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
------------	--	--	--	--	-----------------------------

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
------------	------------------------	------------------------	----------------------	-------------------------------	---------------------

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
General Heavy Industry	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	690	0.05	0.01

5.18. Vegetation

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5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
--------------------------	----------------------	---------------	-------------

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
--------------------	---------------	-------------

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
-----------	--------	------------------------------	------------------------------

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	5.07	annual days of extreme heat
Extreme Precipitation	4.20	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise PAR 1178	1	1	1	2
Wildfire PAR 1178	1	1	1	2

Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	20.8
AQ-PM	67.2
AQ-DPM	59.7
Drinking Water	42.4
Lead Risk Housing	94.8
Pesticides	44.1
Toxic Releases	98.0
Traffic	32.5
Effect Indicators	—
CleanUp Sites	28.7

Groundwater PAR 1178 B-39.1

PAR 1178 B-34

Haz Waste Facilities/Generators	43.7
Impaired Water Bodies	0.00
Solid Waste	37.6
Sensitive Population	—
Asthma	83.0
Cardio-vascular	92.8
Low Birth Weights	35.6
Socioeconomic Factor Indicators	—
Education	88.7
Housing	64.5
Linguistic	80.2
Poverty	71.7
Unemployment	74.1

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	28.7052483
Employed	80.73912486
Median HI	28.56409598
Education	—
Bachelor's or higher	11.58732196
High school enrollment	100
Preschool enrollment	70.15270114
Transportation	—
Auto Access	36.9373797

Active commuting	71.46156807
Social	—
2-parent households	29.78313871
Voting	18.19581676
Neighborhood	—
Alcohol availability	4.516874118
Park access	81.35506224
Retail density	92.85255999
Supermarket access	94.25125112
Tree canopy	32.76016938
Housing	—
Homeownership	26.45964327
Housing habitability	13.98691133
Low-inc homeowner severe housing cost burden	62.17117926
Low-inc renter severe housing cost burden	30.28358784
Uncrowded housing	5.889901193
Health Outcomes	—
Insured adults	9.008084178
Arthritis	88.1
Asthma ER Admissions	21.3
High Blood Pressure	81.4
Cancer (excluding skin)	93.3
Asthma	55.1
Coronary Heart Disease	69.4
Chronic Obstructive Pulmonary Disease	74.0
Diagnosed Diabetes	29.7
Life Expectancy at Birth	77.0

Cognitively Disabled	70.6
Physically Disabled	57.4
Heart Attack ER Admissions	21.1
Mental Health Not Good	27.8
Chronic Kidney Disease	35.4
Obesity	19.4
Pedestrian Injuries	94.5
Physical Health Not Good	27.0
Stroke	70.4
Health Risk Behaviors	—
Binge Drinking	32.5
Current Smoker	39.2
No Leisure Time for Physical Activity	26.6
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	15.5
Elderly	91.2
English Speaking	12.1
Foreign-born	75.5
Outdoor Workers	37.1
Climate Change Adaptive Capacity	—
Impervious Surface Cover	11.6
Traffic Density	71.5
Traffic Access	87.4
Other Indices	—
Hardship	38.2

Other Decision Support	—
2016 Voting	11.4

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	85.0
Healthy Places Index Score for Project Location (b)	34.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	Wilmington Long Beach Carson

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Characteristics: Project Details	Rule 1178 in the South Coast AQMD Jurisdiction
Construction: Construction Phases	Source: Dec 2001 Final EA for PAR 1178
Construction: Off-Road Equipment	Source: (No Welders) Conversation Between PAR 1178 Rules Staff with Supplier, and (1 Crane, 1 Compressor) Dec 2001 Final EA for PAR 1178

Construction: Trips and VMT

Source: (2 Crew/Tool Trucks Driving 40 Miles, 1 Material Delivery Truck Driving 50 Miles) Dec 2001
Final EA for PAR 1178

PAR 1178 - Seals Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	PAR 1178 - Seals
Construction Start Date	1/1/2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	Air District
Windspeed (m/s)	3.50
Precipitation (days)	16.0
Location	33.782633950840065, -118.26814130827408
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4640
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas
App Version	2022.1.1.14

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
General Heavy Industry	PAR 1178 PAR 1178	1000sqft	0.73	32,000 B-44 B-43	0.00	—	—	August 2023 July 2023

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.41	0.33	3.03	4.55	0.01	0.11	0.33	0.44	0.10	0.08	0.18	—	1,225	1,225	0.04	0.04	0.04	1,239
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.05	0.04	0.35	0.53	< 0.005	0.01	0.04	0.05	0.01	0.01	0.02	—	142	142	< 0.005	< 0.005	0.07	143
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.01	0.01	0.06	0.10	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	23.4	23.4	< 0.005	< 0.005	0.01	23.7

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.41	0.33	3.03	4.55	0.01	0.11	0.33	0.44	0.10	0.08	0.18	—	1,225	1,225	0.04	0.04	0.04	1,239

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.05	0.04	0.35	0.53	< 0.005	0.01	0.04	0.05	0.01	0.01	0.02	—	142	142	< 0.005	< 0.005	0.07	143
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.01	0.01	0.06	0.10	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	23.4	23.4	< 0.005	< 0.005	0.01	23.7

3. Construction Emissions Details

3.1. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.34	0.29	2.76	3.44	0.01	0.11	—	0.11	0.10	—	0.10	—	785	785	0.03	0.01	—	788
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.32	0.40	< 0.005	0.01	—	0.01	0.01	—	0.01	—	90.4	90.4	< 0.005	< 0.005	—	90.7
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.0	15.0	< 0.005	< 0.005	—	15.0

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Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.09	1.05	0.00	0.00	0.28	0.28	0.00	0.07	0.07	—	273	273	< 0.005	0.01	0.03	276	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Hauling	0.01	< 0.005	0.19	0.06	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	167	167	0.01	0.03	0.01	175	
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	0.01	0.01	0.01	0.13	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	31.9	31.9	< 0.005	< 0.005	0.05	32.3	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Hauling	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	19.2	19.2	< 0.005	< 0.005	0.02	20.2	
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.28	5.28	< 0.005	< 0.005	0.01	5.35	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.18	3.18	< 0.005	< 0.005	< 0.005	3.34	

4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
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Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Building Construction	Building Construction	1/1/2026	3/1/2026	5.00	42.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Building Construction	Cranes	Diesel	Average	1.00	4.00	367	0.29
Building Construction	Air Compressors	Diesel	Average	1.00	8.00	84.0	0.37

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Building Construction	—	—	—	—
Building Construction	Worker	10.0	40.0	LDA,LDT1,LDT2
Building Construction	Vendor	0.00	10.2	HHDT,MHDT
Building Construction	Hauling	1.00	50.0	HHDT
Building Construction PAR 1178 PAR 1178	Onsite truck	—	B-50 B-49	HHDT August 2023 July 2023

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
General Heavy Industry	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	690	0.05	0.01

5.18. Vegetation

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5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	5.07	annual days of extreme heat
Extreme Precipitation	4.20	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise PAR 1178	1	1	1	2
Wildfire PAR 1178	1	1	1	2

Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	20.8
AQ-PM	67.2
AQ-DPM	59.7
Drinking Water	42.4
Lead Risk Housing	94.8
Pesticides	44.1
Toxic Releases	98.0
Traffic	32.5
Effect Indicators	—
CleanUp Sites	28.7

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Haz Waste Facilities/Generators	43.7
Impaired Water Bodies	0.00
Solid Waste	37.6
Sensitive Population	—
Asthma	83.0
Cardio-vascular	92.8
Low Birth Weights	35.6
Socioeconomic Factor Indicators	—
Education	88.7
Housing	64.5
Linguistic	80.2
Poverty	71.7
Unemployment	74.1

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	28.7052483
Employed	80.73912486
Median HI	28.56409598
Education	—
Bachelor's or higher	11.58732196
High school enrollment	100
Preschool enrollment	70.15270114
Transportation	—
Auto Access	55.9373797

Active commuting	71.46156807
Social	—
2-parent households	29.78313871
Voting	18.19581676
Neighborhood	—
Alcohol availability	4.516874118
Park access	81.35506224
Retail density	92.85255999
Supermarket access	94.25125112
Tree canopy	32.76016938
Housing	—
Homeownership	26.45964327
Housing habitability	13.98691133
Low-inc homeowner severe housing cost burden	62.17117926
Low-inc renter severe housing cost burden	30.28358784
Uncrowded housing	5.889901193
Health Outcomes	—
Insured adults	9.008084178
Arthritis	88.1
Asthma ER Admissions	21.3
High Blood Pressure	81.4
Cancer (excluding skin)	93.3
Asthma	55.1
Coronary Heart Disease	69.4
Chronic Obstructive Pulmonary Disease	74.0
Diagnosed Diabetes	29.7
Life Expectancy at Birth	56.0

Cognitively Disabled	70.6
Physically Disabled	57.4
Heart Attack ER Admissions	21.1
Mental Health Not Good	27.8
Chronic Kidney Disease	35.4
Obesity	19.4
Pedestrian Injuries	94.5
Physical Health Not Good	27.0
Stroke	70.4
Health Risk Behaviors	—
Binge Drinking	32.5
Current Smoker	39.2
No Leisure Time for Physical Activity	26.6
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	15.5
Elderly	91.2
English Speaking	12.1
Foreign-born	75.5
Outdoor Workers	37.1
Climate Change Adaptive Capacity	—
Impervious Surface Cover	11.6
Traffic Density	71.5
Traffic Access	87.4
Other Indices	—
Hardship	57.2

Other Decision Support	—
2016 Voting	11.4

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	85.0
Healthy Places Index Score for Project Location (b)	34.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	Wilmington Long Beach Carson

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Characteristics: Project Details	Rule 1178 in the South Coast AQMD Jurisdiction
Construction: Construction Phases	Source: Dec 2001 Final EA for PAR 1178
Construction: Off-Road Equipment	Source: (No Welders) Conversation Between PAR 1178 Rules Staff with Supplier, and (1 Crane, 1 Compressor) Dec 2001 Final EA for PAR 1178

Construction: Trips and VMT

Source: (2 Crew/Tool Trucks Driving 40 Miles, 1 Material Delivery Truck Driving 50 Miles) Dec 2001
Final EA for PAR 1178

On-Road Vehicles, VMT + Fuel Usage (As Published in the Draft EA)

Activity	Description	Trip Distance (miles)	Number Trips/yr	VMT	Fuel Type	MPG	Fuel Use (Gal/yr)
Doming 59 External Floating Roof Tanks	Equipment Delivery - Heavy-Heavy Duty Vendor Trucks	50	5664	283200	Diesel	6.4	44,453
	Equipment Installation - Passenger Auto	40	5664	226560	Gas	27.0	8,381
Installing Additional Seals for 24 Internal Floating Roof Tanks	Equipment Delivery - Heavy-Heavy Duty Vendor Trucks	50	960	48000	Diesel	6.4	7,534
	Equipment Installation - Passenger Auto	40	960	38400	Gas	27.0	1,421

Fuel Usage = VMT / MPG

Offroad Equipment Fuel Usage

Activity	Equipment	Number of Equipment	Usage Hours/day	Horse power	Load Factor	Fuel Rate (Gal/hr)	Fuel Use (Gal/day)
Doming 59 External Floating Roof Tanks	Cranes	59	10	367	0.29	3.4	589.1
	Welders	177	10	82	0.2	1.5	515.2
	Air Compressors	59	10	84	0.37	1.1	242.1
Installing Additional Seals for 24 Internal Floating Roof Tanks	Cranes	24	4	367	0.29	3.4	95.9
	Air Compressors	24	5	84	0.37	1.1	49.2
Total Diesel Fuel Usage from Offroad Equipment (Gal/yr)							135062.3

Fuel Usage = Hours/day * Days * Load Factor * Fuel Rate

Notes: Horsepower and Load Factor from CalEEMod version 2022.1.1.3

Fuel Type	Construction
Diesel Fuel Usage (Gallons)	187,050
Gas Fuel Usage (Gallons)	9,802

Annual Total Projected Fuel Usage for Construction Activities		
	Diesel	Gasoline
Projected Operational Energy Use (gal/yr) ^a	187,050	9,802
Year 2017 South Coast AQMD Jurisdiction Estimated Fuel Demand (gal/yr)	775,000,000	7,086,000,000
Total Increase Above Baseline	0.02414%	0.000138%
Significance Threshold	1%	1%
Significant?	No	No

Notes:

^a Estimated peak fuel usage from construction activities. Diesel usage estimates are based on the vendor trips and offroad equipment. Gasoline usage estimates are derived from worker trips.

On-Road Vehicles, VMT + Fuel Usage (As Published in the Draft EA)

Activity	Description	Trip Distance (miles)	Number Trips/yr	VMT	Fuel Type	MPG	Fuel Use (Gal/yr)
Doming 54 External Floating Roof Tanks	Equipment Delivery - Heavy-Heavy Duty Vendor Trucks	50	5184	259200	Diesel	6.4	40,686
	Equipment Installation - Passenger Auto	40	5184	207360	Gas	27.0	7,671
Installing Additional Seals for 8 Internal Floating Roof Tanks	Equipment Delivery - Heavy-Heavy Duty Vendor Trucks	50	320	16000	Diesel	6.4	2,511
	Equipment Installation - Passenger Auto	40	320	12800	Gas	27.0	474

Fuel Usage = VMT / MPG

Offroad Equipment Fuel Usage

Activity	Equipment	Number of Equipment	Usage Hours/day	Horse power	Load Factor	Fuel Rate (Gal/hr)	Fuel Use (Gal/day)
Doming 54 External Floating Roof Tanks	Cranes	54	10	367	0.29	3.4	539.2
	Welders	162	10	82	0.2	1.5	471.6
	Air Compressors	54	10	84	0.37	1.1	221.5
Installing Additional Seals for 8 Internal Floating Roof Tanks	Cranes	8	4	367	0.29	3.4	32.0
	Air Compressors	8	8	84	0.37	1.1	26.3
Total Diesel Fuel Usage from Offroad Equipment (Gal/yr)							120632.9

Fuel Usage = Hours/day * Days * Load Factor * Fuel Rate

Notes: Horsepower and Load Factor from CalEEMod version 2022.1.1.3

Fuel Type	Construction
Diesel Fuel Usage (Gallons)	163,830
Gas Fuel Usage (Gallons)	8,144

Annual Total Projected Fuel Usage for Construction Activities		
	Diesel	Gasoline
Projected Operational Energy Use (gal/yr) ^a	163,830	8,144
Year 2017 South Coast AQMD Jurisdiction Estimated Fuel Demand (gal/yr)	775,000,000	7,086,000,000
Total Increase Above Baseline	0.02114%	0.000115%
Significance Threshold	1%	1%
Significant?	No	No

Notes:

^a Estimated peak fuel usage from construction activities. Diesel usage estimates are based on the vendor trips and offroad equipment. Gasoline usage estimates are derived from worker trips.

APPENDIX C

List of Affected Facilities

Since the release of the Draft EA, the following three facilities were added to this appendix:

- Facility ID 174694: Tesoro Logistics, Carson Crude Terminal
- Facility ID 174705: Tesoro Logistics, Colton Terminal
- Facility ID 174711: Tesoro Logistics, Hathaway Terminal

Facility ID	Facility Name	Address	Located within Two Miles of an Airport?
116931	Equilon Enterprises LLC DBA Shell Oil Products US	2457 Redondo Ave, Signal Hill	Yes
117560	Equilon Enterprises LLC Shell Oil Products	Berth 167-169, Suite Mormon Island, Wilmington 90744	No
171107	Phillips 66 Co/LA Refinery Wilmington Pl	1660 W Anaheim St, Wilmington 90744	No
171109	Phillips 66 Los Angeles Refinery Carson Plant	1520 E Sepulveda Blvd, Carson 90745	No
171326	Phillips 66 Pipeline LLC - bulk loading	13500 S Broadway, Los Angeles 90061	No
171327	Phillips 66 Pipeline LLC	2650 Lomita Blvd, Torrance 90505	No
174655	Tesoro Refining & Marketing Company LLC	2350 E 223rd St, Carson 90810	No
174694	Tesoro Logistics, Carson Crude Terminal	24696 S Wilmington Ave, Carson 90745	No
174704	Tesoro Logistics, East Hynes Terminal	5905 Paramount Blvd, Long Beach 90805	No
174705	Tesoro Logistics, Colton Terminal	2395 Riverside Ave, Bloomington 92316	No
174710	Tesoro Logistics, Vinvale Terminal	8601 Garfield Ave, South Gate 90280	No
174711	Tesoro Logistics, Hathaway Terminal	2350 Obispo Ave, Signal Hill 90755	Yes
176377	Tesoro Logistics, Marine Terminal 2	1350 Pier B St, Long Beach 90813	No
181667	Torrance Refining Company LLC	3700 W 190th St, Torrance 90504	No
182752	Torrance Logistics Company LLC	2619 & 2709 E 37th St, Vernon 90058	No
187165	Altair Paramount, LLC	14700-08 Downey Ave, Paramount 90723	No
800022	Calnev Pipe Line LLC	2051 E Slover Ave, Bloomington 92316	No
800026	Ultramar Inc Wilmington Refinery	2402 E Anaheim St, Wilmington 90744	No
800030	Chevron Products Company	324 W El Segundo Blvd, El Segundo 90245	Yes
800057	Kinder Morgan Liquids Terminal	2000 E Sepulveda Blvd, Carson 90810	No
800079	Petro Diamond Terminal Company	1920 Lugger Berth 83 Way, Long Beach 90813	No
800129	SFPP LP Colton Terminal	2359 Riverside Ave, Bloomington 92316	No
800198	Ultramar Inc Wilmington Marine Terminal	961 La Paloma Ave, Wilmington 90744	No
800278	SFPP LP Watson Station	20410 S Wilmington Ave, Carson 90810	No
800369	Equilon Enter. LLC, Shell Oil Prod. U.S.	8100 Haskell Ave, Van Nuys 91406	Yes
800372	Equilon Enterprises LLC	20945 S Wilmington, Carson 90810	No
800393	Valero Energy Corporation	1651 Alameda St, Wilmington 90744	No
800436	Tesoro Refining and Marketing Company LLC	2101 E Pacific Coast Hwy, Wilmington 90744	No
101977	Signal Hill Petroleum	1215 E 29th St, Signal Hill, CA 90755	Yes
800330	THUMBS Long Beach	1105 Harbor Scenic Dr, Suite PIERS J1-J6, Long Beach, CA 90802	No

Facility ID	Facility Name	Address	Located within Two Miles of an Airport?
116931	Equilon Enterprises LLC DBA Shell Oil Products US	2457 Redondo Ave, Signal Hill	Yes
117560	Equilon Enterprises LLC Shell Oil Products	Berth 167-169, Suite Mormon Island, Wilmington 90744	No
171107	Phillips 66 Co/LA Refinery Wilmington PI	1660 W Anaheim St, Wilmington 90744	No
171109	Phillips 66 Los Angeles Refinery Carson Plant	1520 E Sepulveda Blvd, Carson 90745	No
171326	Phillips 66 Pipeline LLC - bulk loading	13500 S Broadway, Los Angeles 90061	No
171327	Phillips 66 Pipeline LLC	2650 Lomita Blvd, Torrance 90505	No
174655	Tesoro Refining & Marketing Company LLC	2350 E 223rd St, Carson 90810	No
174704	Tesoro Logistics East Hynes Terminal	5905 Paramount Blvd, Long Beach 90805	No
174710	Tesoro Logistics Vinvale Terminal	8601 Garfield Ave, South Gate 90280	No
176377	Tesoro Logistics, Marine Terminal 2	1350 Pier B St, Long Beach 90813	No
181667	Torrance Refining Company LLC	3700 W 190th St, Torrance 90504	No
182752	Torrance Logistics Company LLC	2619 & 2709 E 37th St, Vernon 90058	No
187165	Altair Paramount, LLC	14700-08 Downey Ave, Paramount 90723	No
800022	Calnev Pipe Line LLC	2051 E Slover Ave, Bloomington 92316	No
800026	Ultramar Inc Wilmington Refinery	2402 E Anaheim St, Wilmington 90744	No
800030	Chevron Products Company	324 W El Segundo Blvd, El Segundo 90245	Yes
800057	Kinder Morgan Liquids Terminal	2000 E Sepulveda Blvd, Carson 90810	No
800079	Petro Diamond Terminal Company	1920 Lugger Berth 83 Way, Long Beach 90813	No
800129	SFPP LP Colton Terminal	2359 Riverside Ave, Bloomington 92316	No
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800369	Equilon Enter. LLC, Shell Oil Prod. U.S.	8100 Haskell Ave, Van Nuys 91406	Yes
800372	Equilon Enterprises LLC	20945 S Wilmington, Carson 90810	No
800393	Valero Energy Corporation	1651 Alameda St, Wilmington 90744	No
800436	Tesoro Refining and Marketing Company LLC	2101 E Pacific Coast Hwy, Wilmington 90744	No
101977	Signal Hill Petroleum	1215 E 29th St, Signal Hill, CA 90755	Yes
800330	THUMBS Long Beach	1105 Harbor Scenic Dr, Suite PIERS J1-J6, Long Beach, CA 90802	No

APPENDIX D

Comment Letters Received on the Draft EA and Responses to Comments

**APPENDIX D: COMMENT LETTERS RECEIVED ON THE DRAFT EA
AND RESPONSES TO COMMENTS**

TABLE OF CONTENTS

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List of Commenters.....	D-1
CEQA Requirements Regarding Comments and Responses.....	D-2

OVERVIEW

This appendix to the Final EA has been prepared in accordance with the California Environmental Quality Act (CEQA) and the South Coast Air Quality Management District's (South Coast AQMD) Certified Regulatory Program Guidelines. Public Resources Code Section 21080.5, CEQA Guidelines Section 15251(l), and South Coast AQMD's Certified Regulatory Program (codified under Rule 110) require that the final action on PAR 1178 include written responses to issues raised during the public process. South Coast AQMD Rule 110 (the rule which codifies and implements the South Coast AQMD's certified regulatory program) does not impose any greater requirements for summarizing and responding to comments than is required for an environmental impact report under CEQA.

CEQA PROCESS OF THE DRAFT EA

The Draft EA was released for a 30-day public review and comment period that started on July 19, 2023 and ended on August 18, 2023 at 5:00 p.m. A Notice of Completion (NOC) and the Draft EA were filed with the Governor's Office of Planning and Research (OPR) (State Clearinghouse (SCH) #2023070354) and posted on the State Clearinghouse's CEQAnet Web Portal at: <https://ceqanet.opr.ca.gov/2023070354>. In addition, the NOC was filed and posted with the county clerks of Los Angeles, Orange, Riverside, and San Bernardino counties. The NOC was distributed using electronic mail to various government agencies and other interested agencies, organizations, and individuals (collectively referred to as the public). The NOC was also provided 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 Section 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 Draft EA. Additionally, the NOC was published in the Los Angeles Times on July 19, 2023. The NOC and the Draft EA were posted on South Coast AQMD's website at: <http://www.aqmd.gov/home/research/documents-reports/lead-agency-scaqmd-projects>. An email announcing the availability of the NOC and the Draft EA was also sent to interested parties on July 19, 2023.

LIST OF COMMENTERS

Four comment letters were received by South Coast AQMD during the public review and comment period on the Draft EA. This appendix contains responses to comments received in relation to the analysis in the Draft EA. Responses to comments received in relation to the proposed amended rule language (PAR 1178) can be found in Appendix A of the Final Staff Report.

For the purposes of identifying and responding to comments on the Draft EA, the comment letters have been organized according to the date received and assigned a number; individual comments within each letter have been bracketed and assigned a comment number. The following is a list of comment letters received in relation to the Draft EA along with the date each letter was received.

Comment Letter Number	Commenter	Comment Letter Received Date	Page No.
Comment Letters Received During the Public Review Period			
1	Department of Transportation, District 7 – Office of Regional Planning	August 3, 2023	D-3
2	Santa Ynez Band of Chumash Indians	August 14, 2023	D-7
3	Tesoro Refining & Marketing Company LLC	August 17, 2023	D-9
4	Tesoro Refining & Marketing Company LLC	August 18, 2023	D-12

Pursuant to CEQA Guidelines Section 15088(a) and South Coast AQMD Rule 110(d), South Coast AQMD has evaluated and provided written responses to comments received during the Draft EA public comment period.

CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(b) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review and comment of the Draft EA should be “on the proposed finding that the project will not have a significant effect on the environment.” If persons and public agencies believe that the proposed project may have a significant effect, the commenter should: 1) identify the specific effect; 2) explain why they believe the effect would occur; and 3) explain why they believe the effect would be significant. Comments are most helpful when they are as specific as possible. At the same time, reviewers of the Draft EA should be aware that CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. CEQA Guidelines Section 15204(c) further advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence.” CEQA Guidelines Section 15204(e) also states, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

Pursuant to CEQA Guidelines Section 15088(a) and South Coast AQMD Rule 110(d), South Coast AQMD has evaluated and provided written responses to comments received during the Draft EA public comment period. The level of detail contained in each response corresponds to the level of detail provided in the comment (i.e., responses to general comments may be general). In addition, updates to the CEQA analysis have been made due to public comments as well as minor modifications for consistency.

COMMENT LETTER #1 – Department of Transportation, District 7 – Office of Regional Planning, August 3, 2023 (p. 1 of 3)

From: Zhong_Evelyn@DOT
To: [Kevin Ni](#)
Subject: [EXTERNAL] Caltrans District 7 Comment Letter - Proposed Amended Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities – South Coast Air Quality Management District- SCH# 2023070354- GTS #07-MULTIPLE-2023-00368
Date: Thursday, August 3, 2023 6:13:57 PM
Attachments: 07-MULTIPLE-2023-00368 Proposed Amended Rule 1178 Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities.pdf

Greetings,

Please see the attached Caltrans comment letter for the following project:

Proposed Amended Rule 1178 – Further
Reductions of VOC Emissions from Storage
Tanks at Petroleum Facilities
–South Coast Air Quality Management District (EA)
SCH# 2023070354
GTS #07-MULTIPLE-2023-00368

Best,

Evelyn Zhong
Transportation Planning Student Assistant
Caltrans District 7, Division of Planning
100 S. Main Street, MS-16
Los Angeles, CA 90012

COMMENT LETTER #1 – Department of Transportation, District 7 – Office of Regional Planning, August 3, 2023 (p. 2 of 3)

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0067
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



August 1, 2023

Kevin Ni
Acting Program Supervisor
South Coast AQMD
21865 Copley Dr
Diamond Bar, CA 91765

RE: Proposed Amended Rule 1178 –
Further Reductions of VOC Emissions
from Storage Tanks at Petroleum Facilities–
EA (Environmental Assessment)
SCH # 2023070354
GTS #07-MULTIPLE-2023-00368
Vic. LA Multiple

Dear Kevin Ni,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. Proposed Amended Rule (PAR) 1178 establishes more stringent leak detection and repair and control requirements for storage tanks located at petroleum facilities that have emitted more than 20 tons of VOC in any reporting year since the rule’s adoption in 2001. The measure applies to 1,059 storage tanks located at 27 facilities including refineries, bulk storage, loading, and oil production facilities. However, only 54 tanks at eight facilities will need to be domed and eight tanks at seven facilities will need additional roof seals installed.

1-1

After reviewing the draft environmental assessment, Caltrans has the following comments:

On-road passenger vehicles and heavy-duty trucks would be dispatched to the affected facilities to deliver supplies and construction materials. Table 2-5 of the initial study estimates that 165 vehicle trips will occur on a peak day of construction. Construction activities are estimated to result in 15 heavy duty delivery truck round trips which is less than the threshold of 350 truck round trips per day. While the project can be expected to increase vehicle miles traveled (VMT) regionally, construction activities, associated passenger vehicle trips, and delivery truck trips would cease after construction is completed. Existing long-term circulation patterns within the areas of each affected facility would not be substantially changed.

1-2

Caltrans recommends implementing a traffic control plan to minimize disruptions to traffic and ensure adequate emergency access in the event of traffic lane closure during construction. Effective measures incorporate channelizing devices preceded by approved warning signs to 1)

“Provide a safe and reliable transportation network that serves all people and respects the environment”

COMMENT LETTER #1 – Department of Transportation, District 7 – Office of Regional Planning, August 1, 2023 (p. 3 of 3)

Kevin Ni
August 1, 2023
Page 2

divert traffic in advance of a temporary traffic control zone and 2) define traffic lanes through the work zone to protect motorists, bicyclists, or pedestrians.

Any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. Caltrans recommends large size truck trips be limited to off-peak commute periods.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS #07-MULTIPLE-2023-00368.

Sincerely,



MIYA EDMONSON
LDR Branch Chief

cc: State Clearinghouse



1-2
cont'd

"Provide a safe and reliable transportation network that serves all people and respects the environment"

**RESPONSE TO COMMENT LETTER #1 – Department of Transportation, District 7 –
Office of Regional Planning, August 1, 2023**

Response 1-1

Comment 1-1 contains introductory remarks and a brief summary of the proposed project without raising any issues relative to the environmental analysis in the Draft EA. Therefore, no response is required by CEQA. [CEQA Guidelines Section 15088(a)].

Response 1-2

Comment 1-2 contains a summary of the transportation analysis in the Draft EA, and concurs with the conclusions in the Draft EA that the proposed project will result in temporary construction-related traffic but is not expected to result in significant long-term circulation impacts. These conclusions are discussed in the Final EA (see pp. 2-55 through 2-57).

Comment 1-2 also contains a recommendation for affected facilities to implement a traffic control plan during construction to minimize traffic disruptions and ensure adequate emergency access. The transportation analysis in the Final EA has been updated to include this recommendation.

Finally, Comment 1-2 notes that a CalTrans transportation permit is required in the event that oversized transport vehicles traveling on state highways are needed to deliver construction equipment and materials to the affected facilities. While PAR 1178 does not contain any requirements that would interfere with traffic patterns and CalTrans permit requirements, the transportation analysis in the Final EA has been updated to mention this requirement.

COMMENT LETTER #2 – Santa Ynez Band of Chumash Indians, August 14, 2023



Santa Ynez Band of Chumash Indians
Tribal Elders' Council
 P.O. Box 517 ♦ Santa Ynez ♦ CA ♦ 93460
 Phone: (805)688-7997 ♦ Fax: (805)688-9578 ♦

August 14, 2023

South Coast Air Quality Management District
 21865 Copley Drive
 Diamond Bar, CA 91765-4178

Att.: Kevin Ni

Re: Proposed Amended Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities

Dear Mr. Ni:

Thank you for contacting the Tribal Elders' Council for the Santa Ynez Band of Chumash Indians.

At this time, the Elders' Council requests no further consultation on this project; however, we understand that as part of NHPA Section 106, we must be notified of the project.

Thank you for remembering that at one time our ancestors walked this sacred land.

Sincerely Yours,

Crystal Mendoza

Crystal Mendoza
 Administrative Assistant | Cultural Resources
 Santa Ynez Band of Chumash Indians | Tribal Hall
 (805) 325-5537
 cmendoza@chumash.gov

2-1

**RESPONSE TO COMMENT LETTER #2 – Santa Ynez Band of Chumash Indians,
August 14, 2023**

Response 2-1

Comment 2-1 acknowledges contacting the Tribal Elders’ Council for the Santa Ynez Band of Chumash Indians regarding PAR 1178, but requests no further consultation on this proposed project.

The South Coast AQMD provided a formal notice of the proposed project to all California Native American Tribes that either requested to be on the Native American Heritage Commission’s (NAHC) notification list or South Coast AQMD’s mailing list per Public Resources Code Section 21080.3.1(b)(1) and a notice of the proposed project was provided to the commenter. These notices provide an opportunity for California Native American Tribes to request a consultation with the South Coast AQMD if potentially significant adverse impacts to Tribal cultural resources are identified. The Final EA for the proposed project did not identify any potentially significant adverse impacts to Tribal cultural resources and the commenter requests no further consultation. Further, the South Coast AQMD did not receive any consultation requests from any California Native American Tribes, including the commenter, relative to the proposed project. Since this comment does not raise any issues relative to Tribal cultural resources during the comment period for the Draft EA, no further response is necessary under CEQA.

COMMENT LETTER #3 – Tesoro Refining & Marketing Company LLC, August 17, 2023 (p. 1 of 2)



Tesoro Refining & Marketing Company LLC

A subsidiary of Marathon Petroleum Corporation
Los Angeles Refinery
2350 E. 223rd Street
Carson, California 90810
310-816-8100

August 17, 2023

VIA Certified Mail and eMail (kni@aqmd.gov)
Return Receipt Requested

Kevin Ni
Acting Program Supervisor, CEQA
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Re: Comments on Draft Environmental Assessment for South Coast Air Quality Management District Proposed Amended Rule 1178

Dear Mr. Ni:

Tesoro Refining & Marketing Company LLC (Tesoro) submits the following comments on the South Coast Air Quality Management District's (SCAQMD) draft Environmental Assessment (Draft EA) that was released on July 18, 2023. The Draft EA was developed pursuant to the California Environmental Quality Act (CEQA) and evaluates all the potential adverse environmental impacts that could result from implementing Proposed Amended Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities (PAR 1178). Throughout the rulemaking process, Tesoro has continued to be an active participant in the PAR 1178 working group meetings and discussions with SCAQMD staff. Tesoro has assembled the activities that it may undertake to comply with PAR 1178 and submits the details below to be included in SCAQMD's evaluation of PAR 1178 under CEQA.

3-1

Tesoro had previously requested that SCAQMD CEQA Staff include in its Draft EA analysis the conversion of two (2) fixed roof tanks to domed external floating roof (EFR) tanks as a potential method for reducing VOC emissions at Tesoro's Los Angeles Refinery d/b/a Marathon Los Angeles Refinery (LAR). A follow-up discussion was held with SCAQMD CEQA and Rule-writing Staff on August 16, 2023 to discuss inclusion of these two (2) tanks in SCAQMD's CEQA analysis for PAR 1178. During our discussion, CEQA Staff confirmed that the technology of converting fixed roof tanks to external floating roof tanks had been previously evaluated under a prior Rule 1178 CEQA analysis, and that converting external floating roof tanks to domed external floating roof tanks has been evaluated in the PAR 1178 Draft EA. Therefore, the potential future conversion(s) of LAR's two (2) fixed roof tanks to domed EFR tanks has thereby already been reviewed under CEQA. This letter is to confirm SCAQMD's conclusion that LAR's two (2) tanks do not need to be included in the current PAR 1178 Draft EA since these two (2) tanks have already undergone CEQA analysis.

3-2

We appreciate the opportunity to provide comments to support the SCAQMD PAR 1178 CEQA evaluation.

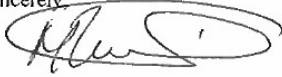
1 See -Draft Environmental Assessment for Proposed Amended Rule-1178.pdf (aqmd.gov)

2 See PAR 1178 (d)(4)(B) on Page 100 of 179 in -Draft Environmental Assessment for Proposed Amended Rule-1178.pdf (aqmd.gov)

**COMMENT LETTER #3 – Tesoro Refining & Marketing Company LLC,
August 17, 2023 (p. 2 of 2)**

Mr. Kevin Ni
August 17, 2023
PAR 1178 CEQA Considerations
Page 2

Sincerely,



Charalabos Patsatzis
Vice President – Marathon Los Angeles Refinery

cc: **SCAQMD**
Michael Krause -- Assistant Deputy Executive Officer
Michael Morris – Planning and Rules Manager
Barbara Radlein – Acting Planning & Rules Manager, CEQA
Rudy Chacon – Program Supervisor
Melissa Gamoning – Air Quality Specialist

ecc: 2023-08-17 MPC CEQA Letter on SCAQMD PAR 1178
Jamie Bartolome, MPC RE
Ruth Cade, MPC RE
Amber Larsen, MPC RE
Luis Martinez, MPC LAR
Robert Nguyen, MPC LAR
Vanessa Vail, MPC LAW

**RESPONSE TO COMMENT LETTER #3 – Tesoro Refining & Marketing Company LLC,
August 17, 2023****Response 3-1**

Comment 3-1 contains introductory remarks about the Draft EA that were prepared for PAR 1178 and notes the commenter's participation in public meetings and contribution to the rule development process without raising any specific issues relative to the environmental analysis in the Draft EA. Therefore, no response is required by CEQA. [CEQA Guidelines Section 15088(a)].

Comment 3-1 also includes a general request for additional information to be included in the CEQA analysis for PAR 1178 which is provided in more detail in Comment 3-2. Please see Response 3-2.

Response 3-2

Comment 3-2 contains a request for an analysis of environmental impacts associated with converting two fixed roof tanks to domed external floating roof tanks to be included in the Draft EA for PAR 1178 and summarizes a conversation between Tesoro representatives and South Coast AQMD staff discussing this request at a meeting held on August 16, 2023.

Comment 3-2 also summarizes the outcome of the conversation during which South Coast AQMD staff indicated that the environmental impacts from converting fixed roof tanks to external floating roof tanks were previously analyzed in the certified Final EA for the adoption of Rule 1178 by the South Coast AQMD Governing Board on December 21, 2001 (referred to herein as the December 2001 Final EA).¹

South Coast AQMD staff confirms that the December 2001 Final EA (see p. 4-10) analyzed the conversion of fixed roof tanks to external floating roof tanks (as well as the conversion to internal floating roof tanks, or the installation of vapor recovery systems venting fixed roof tanks).

For this reason, the Draft EA for PAR 1178 that was released for public review and comment on July 19, 2023, does not contain an analysis of environmental impacts from converting fixed roof tanks to external floating roof tanks. Since PAR 1178 contains a proposal that would result in the installation of domes on external floating roof tanks, the Draft EA for PAR 1178 that was released for public review and comment on July 19, 2023 analyzes the environmental impacts for installing domes on external floating roof tanks. Thus, the Draft EA for PAR 1178 does not need to be revised to include an additional analysis on converting fixed roof tanks to external floating roof tanks.

¹ South Coast AQMD, Final Environmental Assessment for Proposed Amended Rule 1178 - Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities, <http://www.aqmd.gov/home/research/documents-reports/lead-agency-scaqmd-projects/aqmd-projects---year-2001>.

**COMMENT LETTER #4 – Tesoro Refining & Marketing Company LLC,
August 18, 2023 (p. 1 of 3)**

Kevin Ni

From: Bartolome, Jamie L. <JLBartolome@Marathonpetroleum.com>
Sent: Friday, August 18, 2023 3:00 PM
To: Kevin Ni
Cc: Michael Krause; Michael Morris; Barbara Radlein; Rodolfo Chacon; Melissa Gamoning; Hayes, Timothy W.; Mathews, Shan S.; Robinson, Kelly; Smith, Gregory (Law) G.
Subject: [EXTERNAL]Comment Letter on Draft Environmental Assessment for Proposed Amended Rule 1178
Attachments: Tesoro Logistics CEQA Comment Letter.pdf

Dear Kevin,

Tesoro Logistics Operations LLC respectfully submits the attached Comment Letter on the Draft Environmental Assessment for SCAQMD Proposed Amended Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities. We appreciate the opportunity to provide comments. Please let me know if you have any questions.

Sincerely,

Jamie Bartolome

Marathon Petroleum Corporation | Environmental
2350 E. 223rd Street, Carson, California 90810
310.847.5722 Office

**COMMENT LETTER #4 – Tesoro Refining & Marketing Company LLC,
August 18, 2023 (p. 2 of 3)**



Tesoro Logistics Operations, LLC

Mailing Address:
1300 Pier B Street
Long Beach, CA 90813

August 17, 2023

VIA Certified Mail and eMail (kni@aqmd.gov)
Return Receipt Requested

Kevin Ni
Acting Program Supervisor, CEQA
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Re: Comments on Draft Environmental Assessment for South Coast Air Quality Management District Proposed Amended Rule 1178

Dear Mr. Ni:

Tesoro Logistics Operations LLC (“Tesoro Logistics”) submits the following comments on the South Coast Air Quality Management District’s (SCAQMD) draft Environmental Assessment (Draft EA) that was released on July 18, 2023¹. The Draft EA was developed pursuant to the California Environmental Quality Act (CEQA) and evaluates all the potential adverse environmental impacts that could result from implementing Proposed Amended Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities (PAR 1178). Throughout the rulemaking process, Tesoro Logistics has continued to be an active participant in the PAR 1178 working group meetings and discussions with SCAQMD staff. Tesoro Logistics has assembled the activities that it may undertake at its facilities to comply with PAR 1178 and submits the details below to be included in SCAQMD’s evaluation of PAR 1178 under CEQA.

4-1

Correct Appendix C in the Draft EA to include twenty-one (21) tanks located at Tesoro Logistics Operations LLC’s three terminals.

Beginning on page C-1 in Appendix C (List of Affected Facilities) of the Draft EA, the list of affected facilities should be corrected to include the following three facilities:

List of Affected Facilities

Facility ID	Facility Name	Address	Tank(s)	Control Technology
174694	Tesoro Logistics Carson Crude Terminal	24696 S. Wilmington Ave, Carson 90745	5 External Floating Roof tanks storing Organic Liquid with a true vapor pressure of 3 psia or greater	Domes
174711	Tesoro Logistics Hathaway Terminal	2350 Obispo Ave, Signal Hill 90755	14 Internal Floating Roof tanks storing Organic Liquid with	Secondary seal

4-2

¹ See [-Draft Environmental Assessment for Proposed Amended Rule-1178.pdf \(aqmd.gov\)](#)

**COMMENT LETTER #3 – Tesoro Refining & Marketing Company LLC,
August 18, 2023 (p. 3 of 3)**

Mr. Kevin Ni
August 17, 2023
PAR 1178 CEQA Considerations
Page 2

			true vapor pressure of 0.1 psia or greater	
174705	Tesoro Logistics Colton Terminal	2395 S. Riverside Ave, Bloomington 92316	2 Internal Floating Roof tanks storing Organic Liquid with true vapor pressure of 0.1 psia or greater	Secondary seal

Since the Carson Crude Terminal currently emits less than 20 tons per year (TPY) VOC, the terminal is not subject to Rule 1178 based on its current operation. (See page 16 of 54, Statement of Basis Analysis, under Application Numbers 598464 to 598469 for Facility ID 174694 (dated August 21, 2019)). For your reference, the SCAQMD issued Permits to Construct in 2021 for up to six (6) additional new crude storage tanks at the Carson Crude Terminal. After construction and operation of these 6 tanks, the terminal's annual VOC emissions are projected to exceed Rule 1178's 20 TPY threshold as identified by SCAQMD in the Statement of Basis. Therefore, since Carson Crude Terminal will be subject to the applicable requirements of Rule 1178 after completion of the 6 storage tanks (thereby expected to exceed the 20 TPY threshold), Tesoro Logistics requests that Carson Crude Terminal be included in SCAQMD's CEQA analysis for PAR 1178. Tesoro Logistics' Hathaway and Colton Terminals are currently subject to Rule 1178 and exceed the Rule's 20 TPY VOC threshold based on current operating conditions.

4-2

Based on the information above, Tesoro Logistics requests that SCAQMD correct its discussion of PAR 1178 applicability of the Draft EA to include these twenty- one (21) tanks located at Tesoro Logistics' three (3) bulk storage terminals (Carson Crude Terminal, Hathaway Terminal, and Colton Terminal).

We appreciate the opportunity to provide comments to support the SCAQMD PAR 1178 CEQA evaluation. Please direct any questions or comments to Jamie Bartolome by email at JLBartolome@Marathonpetroleum.com.

Sincerely,



Timothy Hayes
Region Manager – Tesoro Logistics Operations LLC

- cc: **SCAQMD**
- Michael Krause – Assistant Deputy Executive Officer
- Michael Morris – Planning and Rules Manager
- Barbara Radlein – Acting Planning & Rules Manager, CEQA
- Rudy Chacon – Program Supervisor
- Melissa Gamoning – Air Quality Specialist

- ecc: 2023-08-17 MPC CEQA Letter on SCAQMD PAR 1178
- Jamie Bartolome, MPC RE
- Shan Mathews, MPLX
- Robert Nguyen, MPC LAR
- Kelly Robinson, MPLX
- Greg Smith, MPLX Law

**RESPONSE TO COMMENT LETTER #4 – Tesoro Refining & Marketing Company LLC,
August 18, 2023****Response 4-1**

Comment 4-1 contains introductory remarks about the Draft EA that were prepared for PAR 1178 and notes the commenter's participation in public meetings and contribution to the rule development process without raising any specific issues relative to the environmental analysis in the Draft EA. Therefore, no response is required by CEQA. [CEQA Guidelines Section 15088(a)].

Comment 4-1 also includes a general request for additional information to be included in the CEQA analysis for PAR 1178 which is provided in more detail in Comment 4-2. Please see Response 4-2.

Response 4-2

Comment 4-2 contains a request for the EA to be updated to analyze the environmental impacts associated with: 1) installing domes on five existing external floating roof tanks at the Tesoro Logistics Carson Crude Terminal (Facility ID 174694) which is not currently but will be subject to PAR 1178 once the six previously permitted, but not yet constructed new storage tanks (which will be equipped with domes) are built and become fully operational; 2) installing 14 secondary seals on 14 existing internal floating roof tanks located at the Tesoro Logistics Hathaway Terminal (Facility ID 174711); and 3) installing two secondary seals on two existing internal floating roof tanks located at the Tesoro Logistics Colton Terminal (Facility ID 174705).

The Final EA has been updated to include this additional information in the analysis. Comment 4-2 states: "After construction and operation of these 6 tanks, the terminal's annual VOC emissions are projected to exceed Rule 1178's 20 TPY threshold..." In actuality, the Tesoro Logistics Carson Crude Terminal will be subject to PAR 1178 once the annual VOC emissions exceed 20 tons per year regardless of the construction and operational status of new tanks. In addition, the construction and operation activities for the six new storage tanks were previously analyzed in the Final Environmental Impact Report for the Tesoro Los Angeles Refinery Integration and Compliance Project (LARIC) which was certified on May 12, 2017.²

² South Coast AQMD, May 2017, Final Environmental Impact Report for the Tesoro Los Angeles Refinery Integration and Compliance Project. <http://www.aqmd.gov/home/research/documents-reports/lead-agency-permit-projects/lead-agency-ceqa-documents---permit-projects-2017>.

ATTACHMENT I

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

**Final Socioeconomic Impact Assessment For
Proposed Amended Rule 1178 – Further Reductions of VOC Emissions
from Storage Tanks at Petroleum Facilities**

September 2023

Deputy Executive Officer

Planning, Rule Development, and Implementation
Sarah L. Rees, Ph.D.

Assistant Deputy Executive Officer

Planning, Rule Development, and Implementation
Ian MacMillan

Planning and Rules Manager

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Reviewed By: Xian-Liang (Tony) Tian, Ph.D.–Program Supervisor
Shah Dabirian, Ph.D.–Consultant
Rodolfo Chacon–Program Supervisor
Michael Morris–Planning and Rules Manager
Brian Tomasovic–Principal Deputy Counsel

ATTACHMENT I

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
GOVERNING BOARD**

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Senator (Ret.)
Senate Rules Committee Appointee

Vice Chair: MICHAEL A. CACCIOTTI
Councilmember, South Pasadena
Cities of Los Angeles County/Eastern Region

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Supervisor, Fourth District
County of San Bernardino

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County of Los Angeles

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Speaker of the Assembly Appointee

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Councilmember, Yorba Linda
Cities of Orange County

JOSE LUIS SOLACHE
Councilmember, Lynwood
Cities of Los Angeles County/Western Region

EXECUTIVE OFFICER:

WAYNE NASTRI

EXECUTIVE SUMMARY

A socioeconomic impact assessment has been conducted to assess the impacts of Proposed Amended Rule 1178 (PAR 1178). A summary of the analysis and findings is presented below.

Key Elements of the Proposed Amendments	PAR 1178 will address volatile organic compound (VOC) emissions from storage tanks located at petroleum facilities and would require doming, vapor recovery units, secondary seals, and optical gas imaging (OGI) inspections. PAR 1178 is estimated to reduce VOC emissions by 0.82 tons per day (tpd).
Affected Facilities and Industries	<p>PAR 1178 would affect 27 facilities in the four-county area. These facilities belong to sectors of petroleum refineries, petroleum bulk stations and terminals, crude oil production, and asphalt manufacturing.</p> <p>Of these 27 affected facilities, 24 facilities are located in Los Angeles County, 3 in San Bernardino County. There are no affected facilities located in Orange and Riverside counties. Regarding specific sectors, 8 out of the 27 facilities refine petroleum, 16 facilities store petroleum in bulk terminals, 2 facilities produce or extract crude oil, and 1 facility manufactures asphalt mixtures and blocks.</p> <p><u>Subsequent to the release of the socioeconomic impact assessment, three additional facilities were identified as subject to Rule 1178.</u></p>
Assumptions for the Analysis	<p>The main requirements of the proposed amended rule that have cost impacts for affected facilities would include doming of storage tanks, installation of secondary seals, and OGI inspections.</p> <p>PAR 1178 requires the installation of a dome on all external floating roof tanks containing organic liquid with a total vapor pressure greater than or equal to 3 psia and containing more than 97% by volume crude oil. Staff identified 54 such tanks that will require a dome to be installed.</p> <p>The impacted facilities are already required, per Title 49 of the Code of Federal Regulations, to conduct an internal periodic inspection of each storage tank according to the American Petroleum Institute 653 (API 653) standard. Specific years by which domes must be installed were chosen to balance operational impacts and timely emission reductions.</p> <p>For tanks with a doming installation year before the year in which an API 653 inspection is required, additional costs are included with the doming installation. These costs include cleaning and degassing costs. Additionally, storage leasing costs were included for tanks located at facilities without excess tank storage capacity on-site, requiring the use of off-site third-party storage leasing.</p> <p>Permitting costs are included for both dome installations and secondary seal</p>

	<p>installations. OGI inspection costs include individual tank scans and overview scans that encompass the entire tank farm at a facility.</p> <p>The cost analysis uses a forecast period from 2024 to 2087 in order to annualize all the dome installation and material costs in equipment lifetime.</p>																																																
<p>Compliance Costs</p>	<p>The total present worth of compliance cost of PAR 1178 is estimated at \$328.26 million and \$152.91 million with 1% and 4% discount rate, respectively. The average annual compliance costs of PAR 1178 are estimated to range from \$5.86 million to \$7.04 million, for a 1% and 4% interest rate, respectively. The table below presents the summary of the average annual cost of PAR 1178 by cost category.</p> <table border="1" data-bbox="467 632 1435 1318"> <thead> <tr> <th data-bbox="467 632 1015 674"></th> <th colspan="2" data-bbox="1015 632 1435 674">Annual Average (2024-2087)</th> </tr> <tr> <th data-bbox="467 674 1015 741">Cost Categories</th> <th data-bbox="1015 674 1226 741">1% Interest Rate</th> <th data-bbox="1226 674 1435 741">4% Interest Rate</th> </tr> </thead> <tbody> <tr> <td colspan="3" data-bbox="467 741 1435 779">Capital Costs</td> </tr> <tr> <td data-bbox="467 779 1015 821">Domed Roof – Materials</td> <td data-bbox="1015 779 1226 821">\$554,835</td> <td data-bbox="1226 779 1435 821">\$983,143</td> </tr> <tr> <td data-bbox="467 821 1015 863">Domed Roof – Installation</td> <td data-bbox="1015 821 1226 863">\$533,077</td> <td data-bbox="1226 821 1435 863">\$944,588</td> </tr> <tr> <td data-bbox="467 863 1015 905">Domed Roof – Permitting</td> <td data-bbox="1015 863 1226 905">\$6,870</td> <td data-bbox="1226 863 1435 905">\$6,870</td> </tr> <tr> <td data-bbox="467 905 1015 947">Domed Roof - Fire Suppression</td> <td data-bbox="1015 905 1226 947">\$111,894</td> <td data-bbox="1226 905 1435 947">\$198,272</td> </tr> <tr> <td data-bbox="467 947 1015 989">Domed Roof - Cleaning and Degassing</td> <td data-bbox="1015 947 1226 989">\$272,254</td> <td data-bbox="1226 947 1435 989">\$482,421</td> </tr> <tr> <td data-bbox="467 989 1015 1031">Domed Roof - Storage Leasing</td> <td data-bbox="1015 989 1226 1031">\$44,214</td> <td data-bbox="1226 989 1435 1031">\$78,344</td> </tr> <tr> <td data-bbox="467 1031 1015 1073">Secondary Seal – Installation</td> <td data-bbox="1015 1031 1226 1073">\$14,139</td> <td data-bbox="1226 1031 1435 1073">\$18,232</td> </tr> <tr> <td data-bbox="467 1073 1015 1115">Secondary Seal - Replace Rubber</td> <td data-bbox="1015 1073 1226 1115">\$2,442</td> <td data-bbox="1226 1073 1435 1115">\$2,770</td> </tr> <tr> <td data-bbox="467 1115 1015 1157">Secondary Seal – Permitting</td> <td data-bbox="1015 1115 1226 1157">\$1,032</td> <td data-bbox="1226 1115 1435 1157">\$1,032</td> </tr> <tr> <td colspan="3" data-bbox="467 1157 1435 1194">Recurring Costs</td> </tr> <tr> <td data-bbox="467 1194 1015 1236">Weekly OGI Inspection</td> <td data-bbox="1015 1194 1226 1236">\$4,212,000</td> <td data-bbox="1226 1194 1435 1236">\$4,212,000</td> </tr> <tr> <td data-bbox="467 1236 1015 1278">Domed Roof - Operating & Maintenance</td> <td data-bbox="1015 1236 1226 1278">\$107,388</td> <td data-bbox="1226 1236 1435 1278">\$107,388</td> </tr> <tr> <td data-bbox="467 1278 1015 1318">Total</td> <td data-bbox="1015 1278 1226 1318">\$5,860,145</td> <td data-bbox="1226 1278 1435 1318">\$7,035,061</td> </tr> </tbody> </table> <p>It is estimated that Weekly OGI Inspections and Domed Roofs will comprise approximately 60% and 38% of the total annual cost of PAR 1178, respectively. The petroleum and coal products manufacturing industry (NAICS 324) is expected to incur about 54% of total average annual cost.</p> <p>The small business analysis shows that out of the 27 affected facilities, none meet the definition of a small business under South Coast AQMD’s Rule 102. One company was identified that is designated as a small business according to the South Coast AQMD’s Small Business Assistance Office (SBAO) definition. Lastly, under the 1990 Clean Air Act Amendments (CAAA) definition, none of the affected facilities will meet the criteria of a small business.</p>		Annual Average (2024-2087)		Cost Categories	1% Interest Rate	4% Interest Rate	Capital Costs			Domed Roof – Materials	\$554,835	\$983,143	Domed Roof – Installation	\$533,077	\$944,588	Domed Roof – Permitting	\$6,870	\$6,870	Domed Roof - Fire Suppression	\$111,894	\$198,272	Domed Roof - Cleaning and Degassing	\$272,254	\$482,421	Domed Roof - Storage Leasing	\$44,214	\$78,344	Secondary Seal – Installation	\$14,139	\$18,232	Secondary Seal - Replace Rubber	\$2,442	\$2,770	Secondary Seal – Permitting	\$1,032	\$1,032	Recurring Costs			Weekly OGI Inspection	\$4,212,000	\$4,212,000	Domed Roof - Operating & Maintenance	\$107,388	\$107,388	Total	\$5,860,145	\$7,035,061
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<p>Job Impacts</p>	<p>Direct costs and corresponding revenues of the proposed project are used as inputs to the REMI PI+ model to assess job impacts and secondary/induced impacts for all the industries in the four-county economy on an annual basis</p>																																																

	<p>through 2080. The forecast period used in the REMI analysis is the period 2024-2080, as 2080 is the latest forecast year allowed by the model.</p> <p>When the compliance cost is annualized using a 4% interest rate, it is projected that no net jobs will be added or forgone from the economy on average over the period from 2024 to 2080. This finding is mainly attributable to the capital-intensive nature of the affected businesses, characterized by a substantial proportion of equipment/machinery relative to labor.</p> <p>Under PAR 1178, the affected facilities are expected to allocate doming compliance expenditures into three expense tranches. This additional spending would result in annual gains of approximately 220, 111, and 306 jobs for the years 2031, 2033, and 2038, respectively, when doming is required for specific tanks. The job impacts are minor for other years. The most negative job impacts are expected to occur in 2039 with 46 net jobs forgone.</p>
<p>Competitiveness and Price Impacts</p>	<p>The overall impacts of PAR 1178 on the production costs and delivered prices in the region are not expected to be significant. According to the REMI Model, PAR 1178 is projected to have a maximum single-year increase in the cost of production for the petroleum and coal products manufacturing industry in the South Coast region by less than 0.01%, and a maximum increase in delivered prices of less than 0.01%. The single-year maximum cost and price increases are expected to take place in 2039. Based on the staff analysis, PAR 1178 would potentially result in an estimated gas price increase of 0.00063 cents per gallon.</p>

INTRODUCTION

PAR 1178 will address volatile organic compound (VOC) emissions from storage tanks at petroleum facilities that have emitted more than 20 tons of VOC in any reporting year since the rule's adoption in 2001. PAR 1178 would require doming of external floating roof tanks storing liquid which is more than 97% by volume crude oil, raise the VOC removal efficiency requirement for vapor recovery units, require secondary seals on all internal floating roof tanks, increase stringency of gap requirements for secondary seals, and require optical gas imaging (OGI) inspections for all tanks. PAR 1178 is estimated to reduce VOC emissions by approximately 0.82 tons per day.

PAR 1178 requires the installation of a dome on all external floating roof tanks containing organic liquid with a total vapor pressure greater than or equal to 3 psia and containing more than 97% by volume crude oil. Staff identified 54 such tanks that will be required to have a dome installed.

Each storage tank is already required, per Title 49 of the Code of Federal Regulations, to conduct an internal periodic inspection according to the American Petroleum Institute 653 (API 653) standard every 10-30 years depending on the tank's condition, service, location, and previous records. This inspection requires an extensive preparation process that involves removing the tank from service and draining, cleaning, and degassing the vapors inside the tank. Given the costs and operational impacts of this inspection process, the specific years by which domes must be installed (2031, 2033, and 2038) were chosen to balance operational impacts with timely emission reductions. For one facility, the facility has the option to complete doming by 2041 to avoid having multiple tanks unavailable at the same time. Staff's objective was to overlap API 653 inspections with dome installations as much as possible.

For tanks with a doming installation year before the year in which an API 653 inspection is required, additional costs are included with the doming installation. These costs include cleaning and degassing costs. Additionally, storage leasing costs were included for tanks located at facilities without excess tank storage capacity on-site, requiring the use of off-site third-party storage leasing.

LEGISLATIVE MANDATES

The legal mandates directly related to the assessment of the proposed rule include South Coast AQMD Governing Board resolutions and various sections of the California Health & Safety Code.

South Coast AQMD Governing Board Resolutions

On March 17, 1989, the South Coast AQMD Governing Board adopted a resolution that calls for an economic analysis of regulatory impacts that includes the following elements:

- Affected industries
- Range of probable costs
- Cost-effectiveness of control alternatives
- Public health benefits

Health and Safety Code Requirements

The state legislature adopted legislation which reinforces and expands the Governing Board resolutions for socioeconomic impact assessments. California Health and Safety Code section 40440.8, which became effective on January 1, 1991, requires a socioeconomic impact assessment be performed for any proposed rule, rule amendment, or rule repeal which "will significantly affect air quality or emissions limitations."

Specifically, the scope of the socioeconomic impact assessment should include the following:

- Type of affected industries;
- Impact on employment and the regional economy;
- Range of probable costs, including those to industry;
- Availability and cost-effectiveness of alternatives to the rule;
- Emission reduction potential; and
- Necessity of adopting, amending, or repealing the rule in order to attain state and federal ambient air quality standards.

Health and Safety Code section 40728.5, which became effective on January 1, 1992, requires the South Coast AQMD Governing Board to actively consider the socioeconomic impacts of regulations and make a good faith effort to minimize adverse socioeconomic impacts. It also expands socioeconomic impact assessments to include small business impacts. Specifically, it includes the following:

- Type of industries or business affected, including small businesses; and
- Range of probable costs, including costs to industry or business, including small business.

Finally, Health and Safety Code section 40920.6, which became effective on January 1, 1996, requires incremental cost-effectiveness be performed for a proposed rule or amendment which imposes Best Available Retrofit Control Technology or "all feasible measures" requirements relating to ozone, CO, SO_x, NO_x, VOCs, and their precursors.

AFFECTED FACILITIES

PAR 1178 would affect 27 facilities in the four-county area. Of these 27 affected facilities, 24 facilities are located in Los Angeles County and 3 facilities are located in San Bernardino County. There are no affected facilities located in Orange and Riverside counties. In terms of specific industrial sectors, 8 out of the 27 facilities refine petroleum, 16 facilities store petroleum in bulk terminals, 2 facilities produce or extract crude oil, and 1 facility manufactures asphalt mixtures and blocks. Accordingly, 16 out of the 27 affected facilities are classified under North American Industrial Classification System (NAICS) 424710 – Petroleum Bulk Stations and Terminals, 8 are classified under NAICS 324110 – Petroleum Refineries, 2 are classified under NAICS 211111 – Crude Petroleum and Natural Gas Extraction, and the remaining one facility is classified under NAICS 324121 – Asphalt Paving Mixture and Block Manufacturing.

Table 1 presents the PAR 1178 affected facilities with their NAICS codes and corresponding industrial sectors.

Table 1
Affected Facilities by NAICS Codes

Facility Name	NAICS	Industry
Equilon Enterprises LLC DBA Shell Oil Products US	424710	Petroleum and petroleum products bulk stations and terminals
Equilon Enterprises LLC Shell Oil Products	424710	Petroleum and petroleum products bulk stations and terminals
Phillips 66 Co/LA Refinery Wilmington Pl	324110	Crude petroleum refineries
Phillips 66 Los Angeles Refinery Carson Plant	324110	Crude petroleum refineries
Phillips 66 Pipeline LLC - bulk loading	424710	Petroleum and petroleum products bulk stations and terminals
Phillips 66 Pipeline LLC	424710	Petroleum and petroleum products bulk stations and terminals
Tesoro Refining & Marketing Company LLC	324110	Crude petroleum refineries
Tesoro Logistics East Hynes Terminal	424710	Petroleum and petroleum products bulk stations and terminals
Tesoro Logistics Vinvale Terminal	424710	Petroleum and petroleum products bulk stations and terminals
Tesoro Logistics, Marine Terminal 2	424710	Petroleum and petroleum products bulk stations and terminals
Torrance Refining Company LLC	324110	Crude petroleum refineries
Torrance Logistics Company LLC	424710	Petroleum and petroleum products bulk stations and terminals
Altair Paramount, LLC	324110	Crude petroleum refineries
Calnev Pipe Line LLC	424710	Petroleum and petroleum products bulk stations and terminals
Ultramar Inc Wilmington Refinery	324110	Crude petroleum refineries
Chevron Products Company	324110	Crude petroleum refineries
Kinder Morgan Liquids Terminal	424710	Petroleum and petroleum products bulk stations and terminals
Petro Diamond Terminal Company	424710	Petroleum and petroleum products bulk stations and terminals
SFPP LP Colton Terminal	424710	Petroleum and petroleum products bulk stations and terminals
Ultramar Inc Wilmington Marine Terminal	424710	Petroleum and petroleum products bulk stations and terminals
SFPP LP Watson Station	424710	Petroleum and petroleum products bulk stations and terminals
Equilon Enter. LLC, Shell Oil Prod. U.S.	424710	Petroleum and petroleum products bulk stations and terminals
Equilon Enterprises LLC	424710	Petroleum and petroleum products bulk stations and terminals
Valero Energy Corporation	324121	Asphalt Paving Mixture and Block Manufacturing
Tesoro Refining and Marketing Company LLC	324110	Crude petroleum refineries
Signal Hill Petroleum	211111	Crude Oil Production
Thums Long Beach	211111	Crude Oil Production

Small Business

The South Coast AQMD defines a "small business" in Rule 102 for purposes of fees as one which employs 10 or fewer persons and which earns less than \$500,000 in gross annual receipts. The South Coast AQMD also defines "small business" for the purpose of qualifying for access to services from the South Coast AQMD's Small Business Assistance Office (SBAO) as a business with an annual receipt of \$5 million or less, or with 100 or fewer employees. In addition to the South Coast AQMD's definitions of a small business, the federal Small Business Administration (SBA) and the federal 1990 Clean Air Act Amendments (1990 CAAA) also provide definitions of a small business.

The 1990 CAAA classifies a business as a "small business stationary source" if it: (1) employs 100 or fewer employees, (2) does not emit more than 10 tons per year of either VOC or NO_x, and (3) is a small business as defined by SBA. Based on firm revenue and employee count, the SBA definitions of small businesses vary by six-digit NAICS codes.¹ For example, according to SBA definition, a business with less than 1,500 employees in the sector of Petroleum Refineries is classified as small business, while the employee threshold for a small business in Wholesale Trade (NAICS 424710) is only 225.

Staff mainly relies on the Dun & Bradstreet data to conduct small business analyses. Since subsidiaries under the same parent company are interest-dependent, staff uses revenue and employee count of each facility's parent company to determine its status of small business. Data for publicly traded companies are derived from the Security Exchange Commission (SEC) filings. In certain cases that the revenue/employee data are unreliable, other external data sources such as Manta, Hoover, and LinkedIn are used. Staff determines data reliability via use of a data quality confidence code in the Dun & Bradstreet data as well as via staff's discretion. The small business analysis shows that out of the 27 affected facilities, none meets the definition of a small business under South Coast AQMD's Rule 102. One company was designated as a small business according to the SBAO definition. Lastly, under the 1990 CAAA definition, none of the affected facilities meet the criteria of a small business.²

Table 2 displays the estimated average annual compliance cost of each facility, the annual revenue of each facility's parent company, and the annual compliance cost as a percent of the revenue of each parent. The ratio of annual compliance costs to the gross annual revenues are expected to be less than one-tenth of one percent for all but two of the affected companies. The two affected companies with a higher annual compliance cost as a percentage of annual revenue are relatively small independent companies, with a maximum annual compliance cost of 1.38% of annual revenue.

¹ https://www.sba.gov/sites/default/files/files/Size_Standards_Table.pdf.

² Based on facility-level data on NO_x and VOC emissions for calendar years 2022.

Table 2
Projected Ratio of Annual Compliance Costs
to the Gross Annual Revenues of Parent Companies

Parent Company Designation	Total Annual Compliance Cost	Total Annual Revenue (\$MM)	% of Revenue
Parent Company 1	\$815,218	\$ 169,990	0.00%
Facility D	\$156,000	-	
Facility E	\$322,650		
Facility F	\$156,000		
Facility G	\$180,568		
Parent Company 2	\$1,083,453	\$ 178,240	0.00%
Facility H	\$254,377	-	
Facility I	\$243,078		
Facility J	\$156,000		
Facility K	\$273,998		
Facility AC	\$156,000		
Parent Company 3	\$462,589	\$ 46,830	0.00%
Facility L	\$306,589	-	
Facility N	\$156,000		
Parent Company 4	\$645,814	\$ 171,190	0.00%
Facility Q	\$324,252	-	
Facility AA	\$165,562		
Facility V	\$156,000		
Parent Company 5*	\$660,381	\$ 237,110	0.00%
Parent Company 6*	\$158,257	\$ 11	1.38%
Parent Company 7	\$625,327	\$ 19,200	0.00%
Facility P	\$156,000	-	
Facility S	\$156,000		
Facility U	\$157,327		
Facility X	\$156,000		
Parent Company 8	\$624,000	\$ 381,310	0.00%
Facility A	\$156,000	-	
Facility B	\$156,000		
Facility Y	\$156,000		
Facility Z	\$156,000		
Parent Company 9*	\$156,000	\$ 154,129	0.00%
Parent Company 10*	\$156,000	\$ 66	0.26%
Parent Company 11*	\$156,000	\$ 3,220	0.01%

* Parent company has only one affected facility

COMPLIANCE COST

PAR 1178 will address VOC emissions from storage tanks located at petroleum facilities storing organic liquid and would require doming, OGI monitoring, and stricter requirements for secondary tank seals, emission control systems, and reporting and recordkeeping.

The main requirements of the proposed amended rule that have the highest cost impacts for affected facilities include doming and OGI inspections. All the costs discussed in this section are expressed in 2023 dollars. Additionally, while this analysis assumes all direct compliance costs are borne by affected facilities, it is possible that some costs will be passed through to end consumers of refined products. A separate assessment of the potential impacts of PAR 1178 on regional gasoline prices is included in the later part of this report.

Many of the costs estimated in this analysis are dependent on site-specific factors and on business decisions made by facilities subject to PAR 1178. Staff strove to represent costs as realistically as possible, given that many factors would ultimately dictate what price a business will pay to implement a control. The estimated cost for each line item was either represented by an industry average, quotes obtained by staff, or a reasonable range of costs, based on the information and data available. The procedure and assumptions for each cost estimate are discussed below.

The total cost includes all compliance costs over a 64-year period, from 2024 to 2087. As presented in Table 3, the total present worth value of compliance cost of PAR 1178 is estimated at \$328.26 million and \$152.91 million, depending on the assumed discount rate (1% or 4%, respectively).³ The average annual compliance costs of PAR 1178 are estimated to range from \$5.86 million to \$7.04 million, depending on the interest rate (1% or 4%, respectively). Table 3 below presents total and average annual compliance cost of PAR 1178 by requirement categories.

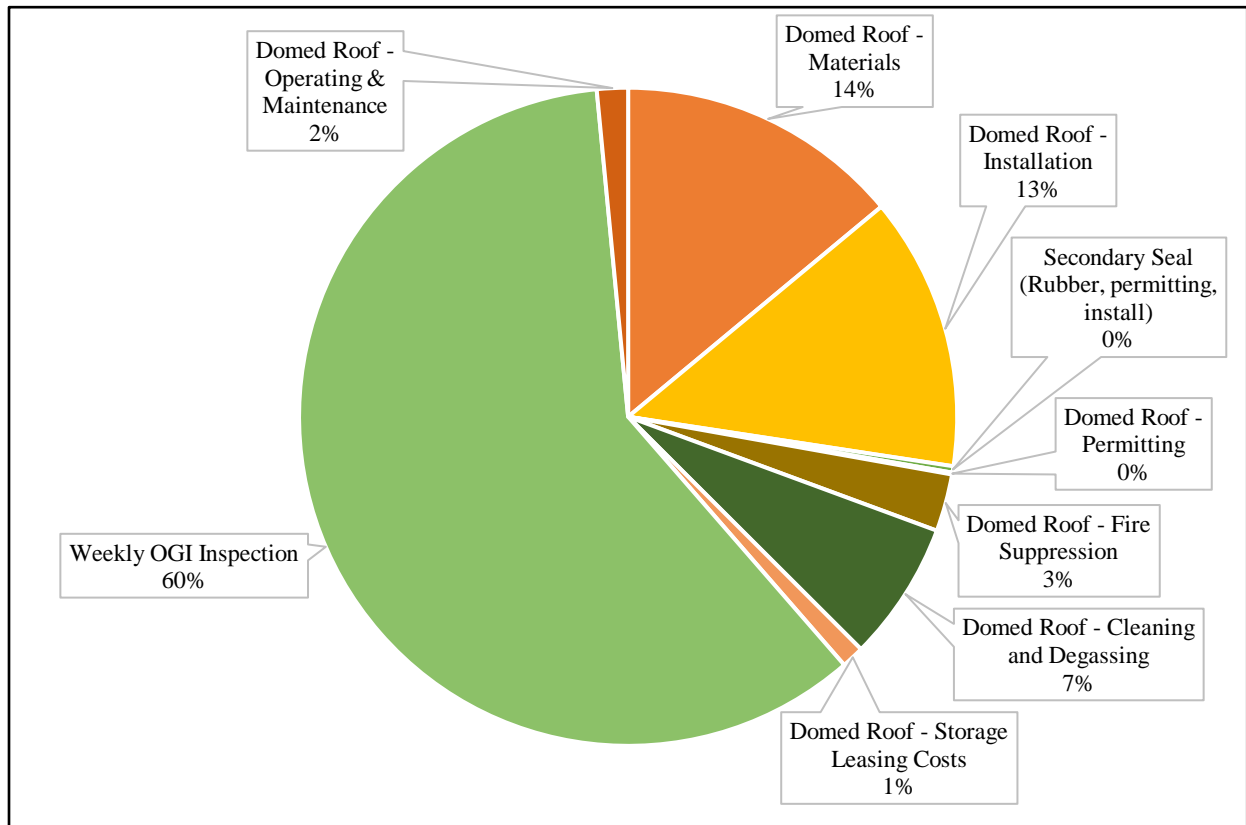
³ In 1987, South Coast AQMD staff began to calculate cost-effectiveness of control measures and rules using the Discounted Cash Flow method with a discount rate of 4 percent. Although not formally documented, the discount rate is based on the 1987 real interest rate on 10-year Treasury Notes and Bonds, which was 3.8 percent. The maturity of 10 years was chosen because a typical control equipment life is 10 years; however, a longer equipment life would not have corresponded to a much higher rate -- the 1987 real interest rate on 30-year Treasury Notes and Bonds was 4.4 percent. Since 1987, the 4 percent discount rate has been used by South Coast AQMD staff for all cost-effectiveness calculations, including BACT analysis, for the purpose of consistency. The incremental cost reported in this assessment was thus annualized using a real interest rate of four percent as the discount rate. As a sensitivity test, a real interest rate of one percent will also be used, which is closer to the prevailing real interest rate.

Table 3
Total Present Worth and Average Annual Estimated Costs of the PAR 1178

Cost Categories	Present Worth Value (Discounted to Year 2024)		Annual Average (2024-2087)	
	1% Discount Rate	4% Discount Rate	1% Interest Rate	4% Interest Rate
Capital Costs				
Domed Roof - Materials	\$44,778,470	\$18,578,144	\$554,835	\$983,143
Domed Roof - Installation	\$43,022,451	\$17,849,589	\$533,077	\$944,588
Domed Roof - Permitting	\$395,926	\$292,571	\$6,870	\$6,870
Domed Roof - Fire Suppression	\$9,040,074	\$3,762,507	\$111,894	\$198,272
Domed Roof - Cleaning and Degassing	\$21,741,546	\$8,733,582	\$272,254	\$482,421
Domed Roof - Storage Leasing	\$3,554,146	\$1,458,606	\$44,214	\$78,344
Secondary Seal - Installation	\$825,758	\$342,728	\$14,139	\$18,232
Secondary Seal - Replace Rubber	\$121,473	\$44,588	\$2,442	\$2,770
Secondary Seal - Permitting	\$60,377	\$46,394	\$1,032	\$1,032
Recurring Costs				
Weekly OGI Inspection	\$200,381,278	\$100,613,271	\$4,212,000	\$4,212,000
Domed Roof - Operating & Maintenance	\$4,339,670	\$1,186,676	\$107,388	\$107,388
Total	\$328,261,170	\$152,908,656	\$5,860,145	\$7,035,061

Figure 1 presents the estimated annual compliance costs of PAR 1178 by the requirement categories. Weekly OGI Inspection recurring costs and doming-related capital costs account for roughly 60% and 38%, respectively, of the total annual cost of PAR 1178.

Figure 1
Annual Estimated Costs of the PAR 1178 by Expense Categories



For the purpose of presenting the annual cost by industry, six-digit NAICS codes are aggregated to more general two-to-three-digit NAICS codes. For example, six-digit NAICS codes 324110 (Petroleum Refineries) and 324121 (Asphalt Paving Mixture and Block Manufacturing) are accounted for in the three-digit NAICS code 324 (Petroleum and Coal Products Manufacturing). Table 4 presents annual and average annual costs of PAR 1178 by the affected industry. As presented in Table 4, the petroleum and coal products manufacturing sector (NAICS 324) is expected to incur about 54% of total annual cost.

Table 4
Average Annual Estimated Costs of the PAR 1178 by Two-to-Three-Digit NAICS

Industry (NAICS)	2024	2030	2035	2040	2060	Average Over All Years (2024-2087)
Wholesale trade (42)	\$2,496,000	\$2,496,000	\$2,821,030	\$3,070,381	\$3,123,282	\$2,974,935
Petroleum and coal products manufacturing (324)	\$1,404,000	\$1,404,000	\$2,752,328	\$4,289,899	\$4,443,446	\$3,748,126
Oil and gas extraction (211)	\$312,000	\$312,000	\$312,000	\$312,000	\$312,000	\$312,000
Total	\$4,212,000	\$4,212,000	\$5,885,358	\$7,672,280	\$7,878,728	\$7,035,061

Table 5 presents average annual cost of the PAR 1178 by the affected facilities. It shows that the estimated annual compliance costs for 19 out of the 27 affected facilities are less than \$200,000, while only one affected facility is expected to incur an annual cost of more than one million dollars.

Table 5
Projected Annual Compliance Costs by Affected Facilities (2023 Dollars)
Average Annual (2024-2087)

Facility Designation	Average Annual Cost
Facility A	\$156,000
Facility B	\$156,000
Facility D	\$156,000
Facility E	\$509,016
Facility F	\$156,000
Facility G	\$206,642
Facility H	\$361,655
Facility I	\$335,420
Facility J	\$156,000
Facility K	\$403,125
Facility L	\$474,503
Facility N	\$156,000
Facility O	\$159,044
Facility P	\$156,000
Facility Q	\$519,990
Facility R	\$1,242,507
Facility S	\$156,000
Facility T	\$156,000
Facility U	\$157,758
Facility V	\$156,000
Facility X	\$156,000
Facility Y	\$156,000
Facility Z	\$156,000
Facility AA	\$168,984
Facility AC	\$156,000
Facility AE	\$156,000
Facility AF	\$156,000
Total Facilities	\$7,034,643

COMPLIANCE COSTS

Dome Installations

A dome is defined in PAR 1178 as an installed roof on external floating roof tanks, designed to reduce emissions from tanks by eliminating wind moving over the external floating roof.

Prior to PAR 1178, companies operating external floating roof tanks containing organic liquid with a total vapor pressure greater than or equal to 3 psia were required to install a dome on the tank. If such a tank was permitted to contain more than 97% by volume crude oil, that tank was exempt from doming. PAR 1178 removes this exemption and requires the installation of a dome on all external floating roof tanks containing organic liquid with a total vapor pressure greater than or equal to 3 psia and containing more than 97% by volume crude oil. Fifty-four such tanks were identified by staff that will be required a dome to be installed.

One-Time and Capital Costs

Stakeholders noted that doming would require draining, cleaning, and degassing the tank prior to the installation of a dome for construction and safety considerations. Tanks are also drained, cleaned, and degassed as part of the tank's API 653 internal inspection, which takes place every 10-30 years independently of PAR 1178, depending on the specifications of the tank. To reduce incurred costs, PAR 1178 aligned the doming schedule of 36 of the 54 tanks to coincide with the specific tank's API 653 internal inspection, when the tank is already drained, cleaned, and degassed. For all facilities but one, this schedule alignment will require doming installations to take place as early as 2031 and no later than 2038. Of the 54 tanks, 18 are not scheduled for API 653 internal inspection prior to the expected full compliance date and are the only tanks which incur costs associated with draining, cleaning, and degassing accounted for in the rule costs. According to conversations with stakeholders, draining, cleaning, and degassing costs are expected to range from \$378,448 to \$1,377,575 per tank, and the total unamortized capital cost is estimated to be \$13,795,836.

According to quotes obtained from suppliers, the costs for the installation of a dome itself vary significantly depending on the diameter of the tank. Also, the installation cost would increase dramatically with increasing tank diameter as the dome diameter must match the diameter of the tank being domed. These costs range from \$100,000 to \$1,750,000 for each tank ranging in size from 30 to 275 feet in diameter. The total unamortized capital cost across all affected facilities and attributed to doming materials and installation is estimated to be \$55,127,494.

Staff assumed that all tanks with a dome installation will require a fire suppression system. Fire suppression is expected to cost an estimated \$105,000 per tank according to quotes obtained by staff. The total unamortized capital cost across all affected facilities and attributed to fire suppression systems for 54 tanks is estimated to be \$5,670,000.

One of the 27 affected facilities will not have excess capacity to divert inflows of crude oil to other tanks due to product type constraints. Staff assumed that this facility would incur storage leasing costs during the period of dome construction and assumed a cost of \$0.50 per barrel, based on staff's conversations with stakeholders. The total unamortized capital cost for this specific facility and attributed to storage leasing is estimated to be \$2,240,422.

PAR 1178 would require each facility to submit a permit application for each doming installation. According to the fee schedules specified in Rule 301, one permit for each tank would cost \$7,002.

Facilities will also need to revise their Title V facility permit, their RECLAIM facility permit, or both depending on the facility. These costs include \$1,482 for RECLAIM facility permit revisions, \$1,857 for Title V facility permit revisions, or \$3,339 for RECLAIM and Title V facility permit revisions. Facilities with multiple tank installations in a single year will only need to submit one facility permit revision application for all tanks. For example, if a facility is both a RECLAIM and Title V facility and has three tanks to be domed in 2031, the total permit fees would be \$7,002 for each of the three tanks (\$21,006 total) plus a RECLAIM and Title V facility permit revision fee of \$3,339, for a grand total of \$24,345. Separately, if a different facility is a RECLAIM facility and not also a Title V facility and has only one tank to be domed in 2033, the total fee would be \$7,002 for the tank plus a RECLAIM facility permit revision fee of \$1,482, for a grand total of \$8,484. The total one-time cost attributed to permitting of dome installations is estimated to be \$439,710 across all affected facilities.

Capital and one-time costs for doming include the doming installation, cleaning and degassing, fire suppression, storage leasing, and permitting.

Recurring Costs

According to feedback from industry stakeholders, domes require minor and infrequent maintenance activities, such as resealing of seams. Lifetime cost estimates obtained by staff range from \$100,000 for a 74-foot diameter tank to \$250,000 for a 260-foot diameter tank. The total cost of these recurring expenses for all affected tanks is \$6,872,830 over a lifetime of 50 years. The maintenance activities are not expected to take place immediately. The timing of O&M cost depends on weather conditions and other variables. On average, these costs would not be incurred until 20 years into each tank's useful life. Taking that into account, staff annualized the total costs of these recurring expenses over the remaining 30-year useful life of the tank to account for uncertainty in the actual timing.

Secondary Seals

Secondary seals are required to be installed along an internal floating roof's circumference to prevent VOC leaks. These seals are complementary to primary seals, which are installed on floating roofs. PAR 1178 requires the installation of secondary seals on internal floating roof tanks storing material with a total vapor pressure of greater than 0.1 psia. Staff identified eight such tanks currently without secondary seals.

Capital Costs

Capital costs for secondary seals include the secondary seal equipment and installation, rubber component replacement, and permitting. No recurring expenses were assumed for secondary seals. Secondary seal costs are based on the linear footage of the internal floating roof's circumference. Installing each secondary seal will involve the following costs: equipment and installation, rubber component replacement, and permit application submittal for secondary seal installation. No breakdown of equipment versus installation costs was provided by the vendors of these

components; only an aggregate cost was provided for each secondary seal. There are no permitting costs associated with rubber component replacements.

Secondary seals include a stainless steel component with a useful life of 20 years. The cost for a secondary seal installation varies depending on the circumference of the tank, with circumferences ranging from 33.5 feet to 64 feet for the eight identified tanks, and installation costs ranging from \$20,680 to \$45,760 per tank, according to quotes from vendors. Thus, the total unamortized capital cost across all affected tanks and due to secondary seal installation is estimated at \$899,580.

Secondary seals also include a rubber component with a useful life of 10 years. According to conversations with vendors, the cost for a rubber component replacement also varies depending on the circumference of the tank, ranging from \$3,948 to \$8,736. The total unamortized capital cost across all affected tanks and attributed to rubber component replacement is estimated to be \$179,423.

Permitting Cost

Permitting costs are based on Rule 301's fee schedule, at a cost of \$7,002 per installation. Facilities will also need to revise their Title V facility permit, their RECLAIM facility permit, or both depending on the facility. These costs include \$1,482 for RECLAIM facility permit revisions, \$1,857 for Title V facility permit revisions, or \$3,339 for RECLAIM and Title V facility permit revisions. Facilities with multiple secondary seal installations in a single year will only need to submit one facility permit revision application for all tanks. For example, if a facility is a Title V facility and not also a RECLAIM facility and has three secondary seal installations in 2033, the total permit fees would be \$7,002 for each of the three seals (\$21,006 total) plus a Title V facility permit revision fee of \$1,857, for a grand total of \$22,863. Separately, if a different facility is both a RECLAIM and Title V facility and has only one secondary seal to be installed in 2033, the total fee would be \$7,002 for the seal and \$3,339 for the RECLAIM and Title V facility permit revision, for a grand total of \$10,341. Staff also accounted for facilities that may have both domes and secondary seal installations and for those facilities and years, only one facility permit revision fee was included. The total one-time cost across all affected facilities and attributed to permitting of secondary seal installations is estimated at \$66,033.

OGI Monitoring

PAR 1178 will require weekly scans using a handheld OGI camera in order to survey all the tanks at a facility. Additionally, the affected facilities will be required to conduct semi-annual component inspections using a handheld OGI camera, specifically for tanks with a floating roof. Handheld OGI cameras are widely used by both leak detection service providers and facilities as a screening device to detect VOC leaks from the equipment.

Since the proportion of the tanks subject to PAR 1178 is small, staff assumed that both semi-annual component inspections and tank farm scans can simultaneously take place during the weekly inspections. Leak detection service providers charge their inspections on a per-day basis. The cost

for each inspection day is \$3,000, which is modeled as a recurring cost in the cost analysis. Staff expects this cost will be incurred every week for all 27 facilities subject to PAR 1178. Thus, the total cost of those recurring expenses is estimated at \$269,568,000 over the period of 2024-2087.

MACROECONOMIC IMPACTS ON THE REGIONAL ECONOMY

The Regional Economic Models, Inc (REMI) PI+ v3 model was used to assess the socioeconomic impacts of the proposed rule.^{4,5} The model links the economic activities in the counties of Los Angeles, Orange, Riverside, and San Bernardino, and it is comprised of five interrelated blocks: (1) output and demand, (2) labor and capital, (3) population and labor force, (4) wages, prices, and costs, and (5) market shares.⁶

It should be noted that the REMI model is not designed to assess impacts on individual operations. The model was used to assess the impacts of the proposed project on various industries that make up the local economy. Cost impacts on individual operations were assessed outside of the REMI model and were aggregated to the 70-sector NAICS code level to be used as inputs into the REMI model.

Impact of Proposed Amendments

The assessment herein is performed relative to a baseline (“business as usual”) forecast where the proposed amendments would not be implemented. It is assumed that the 27 affected facilities would finance the capital and installation costs of control equipment at a 4% interest rate, and that these one-time costs are amortized and incurred over the equipment life. In the PAR 1178 policy scenario, affected facilities would incur an average annual compliance cost of approximately \$5.86 million when costs are annualized using a 1% interest rate, or \$7.04 million when evaluated using a 4% interest rate.

Direct costs of the proposed project are used as inputs to the REMI model. REMI uses this input to assess secondary and induced impacts for all the industries in the four-county economy on an annual basis over the 2024-2080 period. For this time period, 2024 is the first year that the amended rule will incur compliance costs to the affected facilities, while 2080 is the last year that REMI can

⁴ Regional Economic Modeling Inc. (REMI). Policy Insight® for the South Coast Area (70-sector model). Version 3. 2023.

⁵ REMI v3 has been updated based on The U.S. Economic Outlook for 2021-2023 from the University of Michigan's Research Seminar in Quantitative Economics (RSQE) release on May 21, 2021, The Long-Term Economic Projections from CBO (supplementing CBO's March 2021 report The 2021 Long-Term Budget Outlook), and updated BEA data for 2020 (revised on May 27, 2021).

⁶ Within each county, producers are made up of 156 private non-farm industries and sectors, three government sectors, and a farm sector. Trade flows are captured between sectors as well as across the four counties and the rest of U.S. Market shares of industries are dependent upon their product prices, access to production inputs, and local infrastructure. The demographic/migration component has 160 ages/gender/race/ethnicity cohorts and captures population changes in births, deaths, and migration. (For details, please refer to REMI online documentation at <http://www.remi.com/products/pi>).

implement in the analysis. Job impacts are minor and relatively stable after the year 2045 through the end of the REMI forecast in 2080 and staff does not expect any substantial deviations from this trend up to the year 2087. Direct effects of the proposed amendments include (1) additional costs that the facilities would incur by installing domes, secondary seals control equipment, and conducting OGI inspections, (2) additional sales by local vendors of equipment or services which are needed to meet the proposed requirements, and (3) increased regulatory activities by South Coast AQMD from the granting/renewal of permits.

While the compliance expenditures that are incurred by affected facilities would increase their cost of doing business, the purchase of equipment and services would increase the sales and subsequent spending of businesses in various sectors, some of which may be located in the South Coast AQMD region. Table 6 lists the industry sectors modeled in REMI that would incur either direct cost or direct benefit from the compliance expenditures.

Table 6
Industries Incurring vs. Benefitting from Compliance Costs/Spending

Source of Compliance Costs	REMI Industries Incurring Compliance Costs	REMI Industries Benefitting from Compliance Spending
Doming of Tanks	Petroleum and coal products Manufacturing (NAICS 324); Wholesale trade (NAICS 42)	<i>Capital:</i> Construction (NAICS 23); Fabricated metal product manufacturing (NAICS 332); Waste management and remediation services (NAICS 562); Wholesale trade (NAICS 42); <i>Recurring:</i> Construction (NAICS 23)
Secondary Seals	Petroleum and coal products manufacturing (NAICS 324); Wholesale trade (NAICS 42)	<i>Capital:</i> Construction (NAICS 23) <i>Recurring:</i> None
OGI Inspection	Petroleum and coal products manufacturing (NAICS 324); Wholesale trade (NAICS 42); Crude Petroleum and Natural Gas Extraction (NAICS 211)	<i>Capital:</i> None <i>Recurring:</i> Professional, scientific, and technical services (NAICS 54)
Permitting	Petroleum and coal products Manufacturing (NAICS 324); Wholesale trade (NAICS 42)	<i>Capital:</i> State and Local Government (NAICS 92)

Regional Job Impacts

When the compliance cost is annualized using a 4% real interest rate, REMI projects that on average, no net forgone jobs would occur from 2024 to 2080, relative to the baseline scenario.

While most years are forecasted to have a small number of forgone jobs, substantial job increases are expected in the years 2031, 2033, and 2038, when most capital spending is earned by suppliers. These increases in jobs are primarily attributed to two factors: the timing of capital and recurring costs, and the different industries that benefit from compliance spending.

Timing of Capital and Recurring Costs

Although Weekly OGI Inspection recurring costs represent 60% of total annual average compliance costs, these costs are incurred evenly throughout the period from 2024 through 2087 (approximately \$4.2 million per year). The service providers of Weekly OGI Inspections realize these compliance costs as revenue evenly throughout the forecast period.

Domed Roof capital costs, though representing a smaller 38% of total annual average compliance costs, are incurred in three distinct tranches in 2031, 2033, and 2038 (\$24.49 million, \$13.02 million, and \$40.13 million, respectively). On the other hand, dome installers and manufacturers realize this revenue in the same three years generating corresponding job gains.

Different Industries that Benefit from Compliance Spending

The Domed Roof capital costs benefit the construction (NAICS 23), fabricated metal products manufacturing (NAICS 332), Waste management and remediation services (NAICS 562), and Wholesale trade (NAICS 42) industries. The recurring weekly OGI inspection costs benefit the professional, scientific, and technical services (NAICS 54) industry and the ongoing O&M costs benefit the construction industry (NAICS 23). Each of these industries have differing baseline transactional volumes and revenue multipliers as well as differing interrelationships with other industries in the connected regional economy.

Job Impacts

Over the course of the forecast period, the compliance expenditures made by affected facilities for doming and OGI inspections are on average expected to have negligible job impacts. Most years are forecasted to have small number of forgone jobs, ranging from one to five per year. The few forgone jobs are mainly attributable to the capital-intensive nature of the affected businesses, characterized by a substantial proportion of equipment/machinery relative to labor. In 2031, 2033, and 2038, the three years where the construction and metal fabrication industries earn substantial doming-related revenues, the model projects 220, 111, and 306 jobs, respectively, would be added to the regional economy. These higher, but less frequent positive job impacts generally offset the smaller, but more frequent occurrences of negative job impacts resulting in no net jobs being added or lost on average to the regional economy over the forecast period from 2024 to 2080.

The model predicts small numbers of forgone jobs in the years following dome construction. As such, any spillover effects from these forgone jobs into industries such as manufacturing, retail, and food and beverage hospitality should be quite small. As presented in Table 7, job impacts vary by sector, but are minor relative to the overall regional economy. It is important to note that “All Industries”, as presented in Table 7, includes remaining industries not detailed in Table 7.

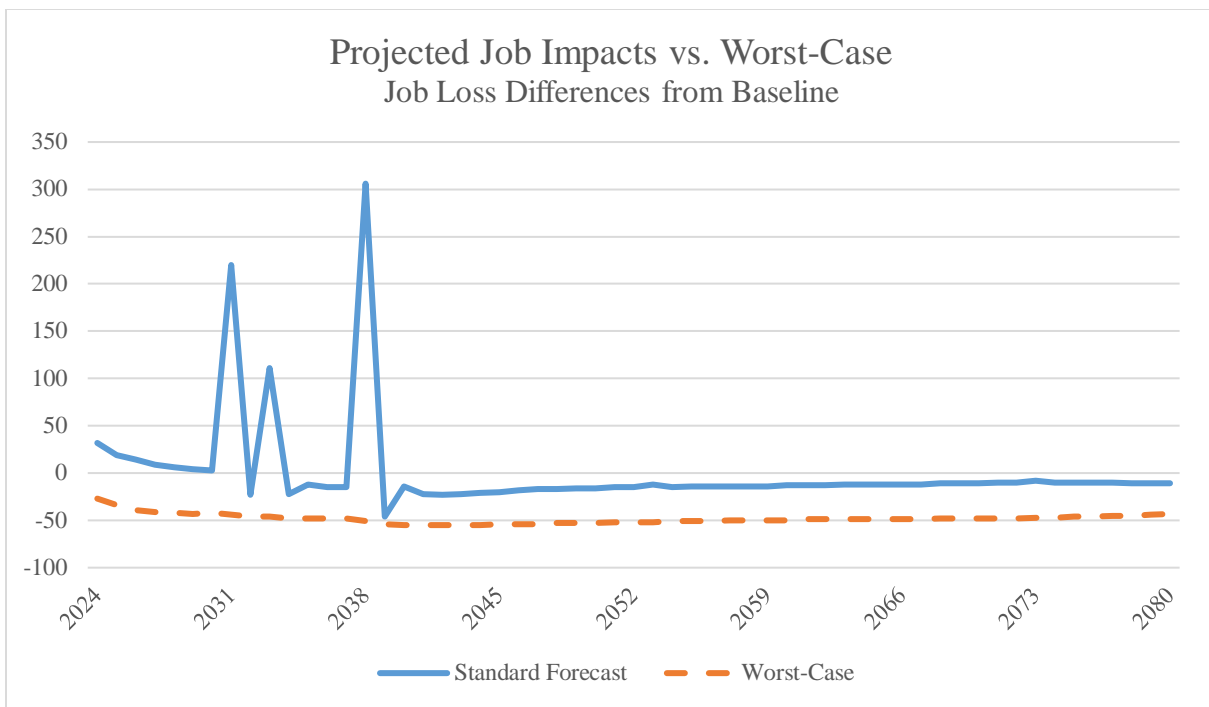
Table 7
Projected Job Impacts of PAR 1178 for Select Industries by Year

Industry (NAICS)	2024	2031	2038	2045	2050	Annual Average (2024-2080)	Baseline Number of Jobs (Average, 2024-2080)	Percent Relative to Baseline
Wholesale trade (42)	-1	2	3	-5	-4	-3	420,362	0.00%
Retail Trade (44-45)	-1	7	10	-3	-3	-2	847,727	0.00%
Petroleum and coal products manufacturing (324)	0	0	-1	-1	-1	-1	5,772	-0.01%
Administrative and Support Services (561)	2	10	14	-2	-2	-1	929,571	0.00%
Crude Petroleum and Natural Gas Extraction (211)	0	0	0	0	0	0	2,362	0.00%
State and Local Government (92)	0	0	0	0	0	0	988,223	0.00%
Construction (23)	0	73	97	-5	-3	1	568,213	0.00%
Fabricated metal product manufacturing (332)	0	25	32	0	0	1	102,875	0.00%
Waste management and remediation services (562)	0	8	29	0	0	1	27,840	0.00%
Professional, scientific, and technical services (54)	23	28	29	13	13	14	1,115,012	0.00%
All Industries	32	220	306	-20	-16	0	12,406,540	0.00%

Figure 2 presents a projected time series of job impacts over the 2024–2080 forecast period. Based on Abt Associate’s 2014 recommendation to enhance socioeconomic analysis by conducting

scenario analysis on major assumptions, staff has analyzed an alternative worst-case scenario where the affected facilities would not purchase any control equipment or services from providers within the South Coast AQMD four-county region and instead purchase control equipment and services from outside the region. In short, this scenario models the impacts of only the costs of compliance with PAR 1178, and none of the revenues realized by associated service providers. This is a hypothetical scenario designed to test the sensitivity of REMI’s embedded assumptions about how compliance costs and revenues would be distributed inside and outside the region. In practice, OGI inspections are likely to be conducted by local companies due to the quantity of tanks and the ongoing requirement of OGI inspections. Moreover, doming construction jobs are likely to be performed by local construction companies. This worst-case scenario would result in an annual average of approximately 47 jobs forgone. The 47 jobs forgone represent 0.0004% of the average baseline jobs in the regional economy.

Figure 2: Projected Regional Job Impact, 2024-2080



Impact on Regional Fuel Prices

The Final Socioeconomic Impact Assessment for Rule 1109.1 adopted in November 2021 assessed the potential socioeconomic impacts of rule compliance by the affected refineries⁷. This report included a study by a third-party subject matter expert who estimated that about 30% of variable costs (i.e., annual operational costs) incurred by the refineries within the South Coast AQMD jurisdiction could be passed on to consumers and local industries through increased regional

⁷ <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-Nov5-034.pdf>, PDF page 846.

gasoline prices. Rule 1109.1 was estimated to result in an average annual increase in regional gasoline price by 0.0042⁸ cents per gallon, assuming 30% of all O&M costs, net of annual cost-savings, would be pass-through. Based on the same method and using the ratio of PAR 1178 total annual O&M costs to Rule 1109.1 total annual O&M costs in 2023 dollars (\$4.3MM / \$29.1MM = 0.15), the impact of PAR 1178 on regional gasoline prices would be 0.00063 cents per gallon (= 0.0042 cents * 0.15 = 0.00063 cents).

To reach full compliance by 2041, firms would need to install domes on 4 tanks per year on average. According to construction quotes obtained by staff, dome installation should not take longer than 4 months. Given the long-dated compliance deadlines, alignment with existing API inspection schedules, and reasonably short downtime required for dome installation, the impacts to local refining capacity should be minor. In addition, any supply shortfalls into the local market can be rapidly filled by increases in the supply of refined products from other markets outside of Southern California, as well as reductions in exports to markets outside of California.

As a specific illustration of this point, it is instructive to consider the response of the market to the Torrance refinery fire in February 2015. Immediately after the refinery fire, prices rose substantially, and inventories were drawn down.⁹ But, after several weeks, refineries outside the region adjusted their production, began to produce refined products compliant with California standards, and began to deliver these products through the San Pedro Bay Ports. This lag, between the event and the response by firms in the market, reflects the time required by firms to adjust in response to unexpected market conditions and is one of the reasons why unexpected events (like a refinery fire) might have a large impact on prices. However, if the outage has been scheduled and anticipated by the industry as would be the case for PAR 1178, it's reasonable to expect that the firms would adjust production in advance resulting in greater price stability.

Staff also reviewed the impact to total facility production caused by doming. While a dome is being installed on a tank, the tank would not be in use and there would be a period of approximately 42 days where total facility throughput would be impacted from the tank's inability to process product. Staff reviewed Annual Emissions Reporting (AER) data on the average and maximum throughputs for all PAR 1178 affected tanks for years 2015, 2016, 2017, 2019, 2021, and 2022 and calculated the facility-wide average and maximum throughputs for each tank. The maximum throughput for a given tank across all years was assumed to be a conservative estimate of the operational maximum throughput capacity of that tank.

Staff then aggregated each tank's maximum and average throughput to the facility level. To estimate each facility's average capacity utilization, average throughput was divided by maximum throughput. As an example, if an affected facility has a maximum facility AER throughput of 10,000,000 barrels per year, and an average facility AER throughput of 7,000,000 barrels per year, the capacity utilization is 70%.

⁸ Adjusted to 2023 dollars (0.0035 cents in 2021 dollars).

⁹ <http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1109.1/1109-1-draft-socioeconomic-impact-assessment-090721-merged.pdf?sfvrsn=10> (page 67).

Capacity utilization figures for affected facilities ranged from 17% to 86%. All capacity utilization values were less than 100%, implying that these facilities have excess capacity based on AER data and can distribute the lost throughput from dome construction amongst other existing tanks that are not offline.

Staff calculated the total facility level throughput that cannot be processed as a result of doming in the years of 2031, 2033, and 2038. These lost capacity values were then compared to the available excess capacity for each facility to calculate whether there was remaining excess capacity, even after accounting for the lost capacity from doming downtime. For all doming years, this remaining excess capacity is a positive value, indicating that the available excess capacity is more than sufficient to distribute lost capacity from doming tanks amongst other on-site tanks.

Please refer to the Table 8 below for a summary of this analysis and the lost capacity analysis in the first year of doming.

Table 8
Excess Capacity Analysis

(a)	(b)	(c)	(d)	(e)	(f)	Year 1 (2023)		
						(g)	(h)	(i)
Facility	# of Total Tanks	Average Annual Throughput (bbls/yr)	Estimated Maximum Capacity (bbls/yr)	Capacity Utilization (c/d=e)	Available Excess Capacity (bbls/yr) (d-c=f)	# of Tanks Domed	Total Lost Capacity from Doming (bbls/yr)	Remaining Excess Capacity (bbls/yr) (f-h=i)
A	8	22,557,853	35,901,972	63%	13,344,119	3	973,387	12,370,732
B	12	1,653,040,233	9,498,855,855	17%	7,845,815,622	4	63,404,283	7,782,411,339
C	2	6,493,559	17,404,499	37%	10,910,940	1	373,602	10,537,338
D	6	50,808,258	58,837,652	86%	8,029,394	2	1,948,810	6,080,584
E	7	3,736,756	6,123,826	61%	2,387,070	3	184,278	2,202,791
F	7	17,080,368	22,844,105	75%	5,763,737	3	842,319	4,921,418
G	8	13,661,029	21,575,141	63%	7,914,112	3	589,483	7,324,630
H**	4	22,284,060	29,639,216	75%	7,355,156	2	1,282,097	6,073,060

* It is assumed that the facility average annual throughput and estimated maximum capacity would remain unchanged through 2031 for the purpose of this analysis

** Facility H is expected to be the only facility leasing storage off-site due to product type constraints preventing the use of excess capacity associated with its four on-site tanks

Competitiveness

The Final Socioeconomic Impact Assessment for Rule 1109.1 also discussed the competitive dynamics in the petroleum refining industry in Southern California. According to the report, most regional fuel demand is supplied by local producers which are covered under PAR 1178. Since the rule impacts all affected facilities similarly, there should be no impact to the relative competitive standing of affected facilities.

The overall impacts of the PAR 1178 on the production costs and delivered prices in the region is not expected to be significant. According to the REMI Model, PAR 1178 is projected to increase the cost of production of the petroleum and coal products manufacturing industry in the South Coast region of 0.0097%, and a maximum increase in delivered prices of 0.0089% in 2039 when all the requirements are satisfied. Based on the staff analysis, PAR 1178 would only result in an estimated gas price increase of 0.00063 cents per gallon. Therefore, implementation of the PAR 1178 is not expected to have a significant impact on the competitiveness of the refinery industry and the local economy of the South Coast region.

REFERENCES

Regional Economic Modeling Inc. (REMI). Policy Insight® for the South Coast Area (70-sector model). Version 3, 2023.

SBA Small Business and Standard Size.

https://www.sba.gov/sites/default/files/files/Size_Standards_Table.pdf.

South Coast AQMD. Final Socioeconomic Assessment of PAR 1109.1.

<http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-Nov5-034.pdf?sfvrsn=6> Page 846.

South Coast AQMD. Proposed Amended Rule 1178 Preliminary Draft Staff Report, August 2023.



Proposed Amended Rule 1178 Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities

A photograph of several large, cylindrical petroleum storage tanks at an industrial facility during dusk. The tanks are illuminated by warm lights, and the sky is a mix of purple and blue. A dark blue fence is visible in the foreground.

Board Meeting
September 1, 2023

Background

- Adopted in 2001 and regulates VOC emissions from storage tanks located at petroleum facilities that have emitted more than 20 tons VOC per year
 - Contains more stringent control requirements than Rule 463 that also regulates VOC emissions from tanks
- Recently amended on May 5, 2023 to address a SIP deficiency
- Proposed Amended Rule 1178 (PAR 1178) affects 30 facilities and nearly 1,100 tanks



PAR 1178

Assembly Bill 617

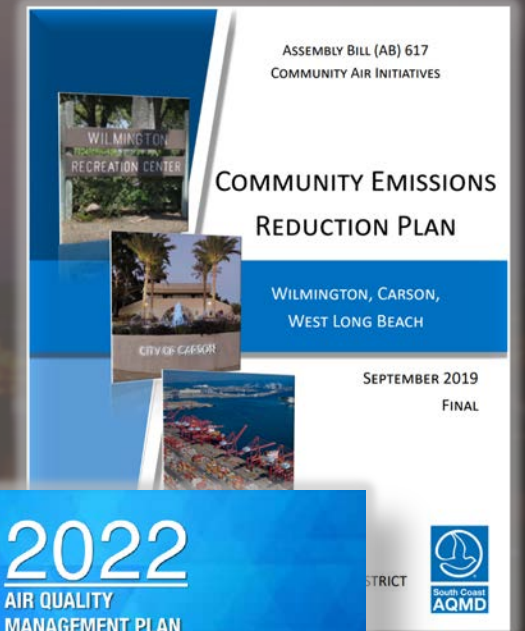
- PAR 1178 initiated in response to Wilmington, Carson, West Long Beach Community Emission Reduction Plan
- Identified strategies to reduce emissions from refineries including improved leak detection and additional controls

2022 Air Quality Management Plan

- PAR 1178 partially implements FUG-01 of the 2022 Final AQMP
- Seeks to reduce VOC emissions from leaks with advanced leak detection technologies

Best Available Retrofit Control Technology (BARCT)

- PAR 1178 implements BARCT for storage tanks located at large petroleum facilities



Leak Detection with Optical Gas Imaging

- First South Coast AQMD rule to implement optical gas imaging (OGI)
- Current inspections require analyzer held near interface of leak
 - Inspections quarterly or semi-annually



- OGI cameras scan VOC vapors to find larger leaks more efficiently
- Frequent OGI inspections will identify large sources of emissions from leaks quickly and result in faster repair timelines, thus reducing emissions
- Provides a comprehensive leak detection and repair program when paired with current inspections

- Proposing weekly OGI inspections for tank farms and semi-annual OGI component inspections for floating roof tanks
 - Begin July 1, 2024



Proposed Doming Requirements



- Domes reduce emissions by mitigating a “wind effect” that pulls vapors through floating roof seals
- Proposing doming for *all* crude oil tanks
 - Currently exempt from doming
- Begin in 2026 with full implementation by 2038
 - Unique facility granted extra time due to size and amount of crude processed

Proposed Controls for Secondary Seals and Gaps

- Require secondary seals on all floating roof tanks
- Currently not required for all tanks
- Install when tank is next emptied
- More stringent gap requirements for all rim seals
- Begin upon date of adoption



Other Proposed Requirements

Emission Control Systems

- 98% emission control for fixed roof tanks
- Begin date of adoption

Reporting and Recordkeeping

- Leak notifications
- Written and digital records of OGI inspections

True Vapor Pressure Testing

- Periodic testing to confirm vapor pressure of tank contents

Rule Development

- Staff worked with stakeholders including facilities, environmental groups, technology suppliers, and tank service providers to develop PAR 1178
 - Eight working group meetings
 - One public workshop held as part of public process
 - Multiple site visits
 - Individual meetings with stakeholders to address specific concerns
- One key issue regarding doming implementation schedule
 - Staff worked closely with stakeholder to develop alternative schedule feasible for facilities
- Staff is not aware of any remaining key issues

Cost-Effectiveness and Emission Reductions

- PAR 1178 expected to result in VOC emission reductions of 0.82 tons per day
- Overall cost-effectiveness of PAR 1178 is \$27,800 per ton of VOC reduced

Proposed Requirement	Cost-Effectiveness (\$/ton)	Reductions (tpd)
Weekly tank farm/semi-annual component OGI inspections	\$25,400	0.45
Doming crude oil tanks	\$36,800	0.28
98% control efficiency for fixed roof tanks	\$0 per ton (already meeting proposed requirement)	0.07
Adding secondary seals	\$22,800	0.01
Stringent gap requirements	\$0 per ton (already meeting proposed requirement)	0.01

Staff Recommendations

Recommendation is to adopt Resolution:

- Certifying the Final Environmental Assessment for PAR 1178
- Amending Proposed Amended Rule 1178

BOARD MEETING DATE: September 1, 2023

AGENDA NO. 35

PROPOSAL: Determine That Proposed Amended Rule 1111 – Reduction of NO_x Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces, Is Exempt From CEQA; and Amend Rule 1111

SYNOPSIS: Rule 1111 establishes a NO_x emission limit of 14 ng/J for residential and commercial gas furnaces. Proposed Amended Rule 1111 will extend the mitigation fee alternate compliance option end date from September 30, 2023 to September 30, 2025 for mobile home furnaces. All other types of furnaces subject to Rule 1111 have fully implemented the 14 ng/J NO_x limit; mobile home furnaces are the last type with the mitigation fee alternate option.

COMMITTEE: Stationary Source, August 18, 2023, Reviewed

RECOMMENDED ACTIONS:

Adopt the attached Resolution:

1. Determining that Proposed Amended Rule 1111 – Reduction of NO_x Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces, is exempt from the requirements of the California Environmental Quality Act; and
2. Amending Rule 1111 – Reduction of NO_x Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces.

Wayne Natri
Executive Officer

SR:MK:HF:YZ:PC

Background

Rule 1111 - Reduction of NO_x Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces (Rule 1111) reduces NO_x emissions from residential and commercial gas-fired fan-type space heating furnaces with a rated heat input capacity of less than 175,000 British thermal units (Btu) per hour or, for combination heating and cooling units, with a cooling rate of less than 65,000 Btu per hour. The rule applies to manufacturers, distributors, sellers, and installers of such furnaces.

Rule 1111 was adopted on December 1, 1978, and was amended on November 6, 2009 to lower the NOx emission limit from 40 to 14 nanograms per Joule (ng/J) with staggered implementation schedules depending on the furnace type. The rule was later amended in 2014, and amended several times between 2018 and 2021, to provide and extend an alternate compliance option to allow manufacturers to pay a per-unit mitigation fee, in lieu of meeting the lower NOx emission limit, for up to five years past the applicable compliance date.

Mobile home furnaces, which constitute about four percent of the Rule 1111 furnace sales within the South Coast AQMD, will be required to comply with the 14 ng/J NOx emission limit after September 30, 2023, when the mitigation fee alternate compliance option ends. Mobile home furnaces are designed specifically and solely for installation on mobile homes that are also subject to regulations by U.S. Department of Housing and Urban Development (HUD) and DOE. Currently, none of the manufacturers have developed, or plan to develop, mobile home furnaces that comply with the 14 ng/J NOx limit due to: 1) the low volume of mobile home furnaces sold in the South Coast AQMD, 2) challenges of meeting additional regulations set forth by HUD and the DOE, and 3) future policy direction to analyze the feasibility of units achieving zero NOx emission standards. Manufacturers, distributors, and installers will not be able to comply with the 14 ng/J NOx emission limit by the September 30, 2023, compliance date for mobile home furnaces. All other furnace types subject to Rule 1111 already comply with the 14 ng/J NOx emission limit.

Public Process

Staff has conducted individual meetings with mobile home manufacturers and interested environmental groups to monitor the rule implementation status and discuss the proposed rule amendment. A Public Consultation was held on July 19, 2023.

Proposed Amendments

Proposed Amended Rule 1111 (PAR 1111) will extend the mitigation fee alternate compliance option end date from September 30, 2023, to September 30, 2025, for mobile home furnaces. This proposal does not change the requirements for the mitigation fee, recordkeeping, or reporting requirements.

The proposed amendment aligns with various local and state zero-emission policies by allowing manufacturers to dedicate resources toward zero-emission heating equipment, such as heat pumps. Rule development will be initiated to evaluate the feasibility of requiring zero-emission NOx technologies for residential and commercial buildings, including for mobile home heating units.

Emission Reductions

Total mobile home furnace annual sales are estimated at 6,000 units in the South Coast AQMD. A two-year delay in compliance would result in an estimated 0.016 tons per day of delayed emission reductions. The future rule development for zero-emissions could offset the delayed emission reductions.

Key Issues

Environmental groups have requested an increase to the mitigation fee for mobile home furnaces in order to incentivize manufacturers to develop compliant models and increase funding for incentives to deploy zero-emission technologies.

Manufacturers and their supply chains generally pass the Rule 1111 mitigation fee to consumers and often list the fee on the invoice as a separate line item. Most mobile homes are located in lower income communities, and increasing the mobile home furnace mitigation fee may impose a greater financial impact on those consumers. Staff is in the process of developing a new incentive program for all-electric heat pumps for space heating, with a focus on lower income communities, including mobile homes. Staff has identified funding for the new program and will continue to explore more funding sources to incentivize more units.

California Environmental Quality Act

Pursuant to the California Environmental Quality Act (CEQA) Guidelines Sections 15002(k) and 15061, PAR 1111 is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3). A Notice of Exemption has been prepared pursuant to CEQA Guidelines Section 15062 and is included as Attachment H to this Board letter. If the proposed project is approved, the Notice of Exemption will be filed for posting with the county clerks of Los Angeles, Orange, Riverside, and San Bernardino counties, and with the State Clearinghouse of the Governor's Office of Planning and Research.

Socioeconomic Impact Assessment

PAR 1111 does not impose any additional requirements and will have no adverse socioeconomic impacts.

AQMP and Legal Mandates

The proposed amendment delays implementation of a lower-NO_x emission limit originally established to comply with the 2007 AQMP control measure CMB-03 – Further NO_x Reductions from Space Heaters

Resource Impacts

Existing staff resources are adequate to implement the proposed amended rule.

Attachments

- A. Summary of Proposal
- B. Key Issues and Responses
- C. Rule Development Process
- D. Key Contacts List
- E. Resolution
- F. Proposed Amended Rule 1111
- G. Final Staff Report
- H. Notice of Exemption from CEQA
- I. Board Presentation

ATTACHMENT A

SUMMARY OF PROPOSAL

Proposed Amended Rule 1111 – Reductions of NO_x Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces

Summary of Proposed Amendments

- Extend the mitigation fee alternate compliance option end date from September 30, 2023, to September 30, 2025, for mobile home furnaces

ATTACHMENT B

KEY ISSUES AND RESPONSES

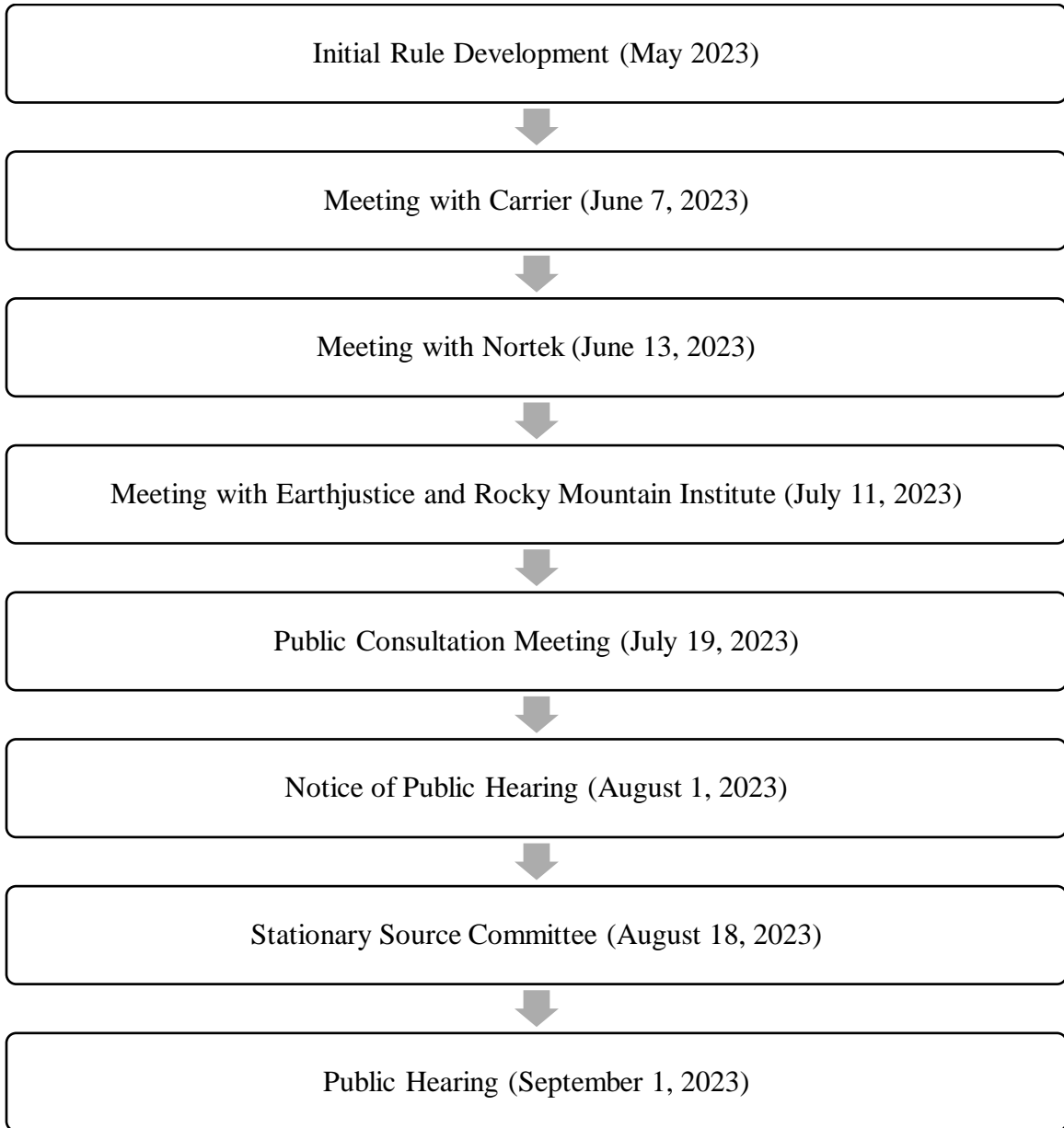
Proposed Amended Rule 1111 – Reduction of NO_x Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces

Environmental groups have requested an increase to the mitigation fee to further incentivize manufacturers to move away from 40 ng/J mobile home furnaces and to increase funding for zero-emission appliance rebate programs.

Staff recognizes that manufacturers and their supply chains generally pass the Rule 1111 mitigation fee to consumers and often list the fee on the invoice as a separate line item. Most mobile homes are located in lower income communities, and increasing the mobile home furnace mitigation fee may impose a greater financial impact to these consumers. Further, mobile home furnaces, estimated to be approximately four percent of all furnace sales in the South Coast AQMD, constitute a small market for manufacturers to invest in lower-NO_x emission technology, and thus they may not be profitable to develop. Furnace manufacturers are currently dedicating their resources towards the development of zero-emission heating technologies, such as heat pumps, to meet the various local and state agencies in California to adopt zero-emission policies.

ATTACHMENT C
RULE DEVELOPMENT PROCESS

Proposed Amended Rule 1111 – Reduction of NO_x Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces



Four (4) months spent in rule development

One (1) Public Consultation Meeting

Three (3) Stakeholder Meetings

ATTACHMENT D

KEY CONTACTS LIST

Proposed Amended Rule 1111 – Reduction of NO_x Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces

The Air Conditioning, Heating, and Refrigeration Institute (AHRI)

Carrier Corporation

Earthjustice

Johnson Controls

Nortek Global HVAC

Rocky Mountain Institute

Trane Technologies

ATTACHMENT E

RESOLUTION NO.23-_____

A Resolution of the Governing Board of the South Coast Air Quality Management District (South Coast AQMD) determining that Proposed Amended Rule 1111 – Reduction of NO_x Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces, is exempt from the requirements of the California Environmental Quality Act (CEQA).

A Resolution of the South Coast AQMD Governing Board amending Rule 1111 – Reduction of NO_x Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces.

WHEREAS, the South Coast AQMD Governing Board finds and determines that Proposed Amended Rule 1111 is considered a “project” as defined by CEQA; and

WHEREAS, the South Coast AQMD has had its regulatory program certified pursuant to Public Resources Code Section 21080.5 and CEQA Guidelines Section 15251(l), and has conducted a CEQA review and analysis of the proposed project pursuant to such program (South Coast AQMD Rule 110); and

WHEREAS, the South Coast AQMD Governing Board finds and determines after conducting a review of the proposed project in accordance with CEQA Guidelines Section 15002(k) – General Concepts, the three-step process for deciding which document to prepare for a project subject to CEQA, and CEQA Guidelines Section 15061 – Review for Exemption, procedures for determining if a project is exempt from CEQA, that the proposed project is exempt from CEQA; and

WHEREAS, the South Coast AQMD Governing Board finds and determines that since implementation of the proposed project would result in delayed NO_x emission reductions which are expected to be temporary and less than the South Coast AQMD air quality significance threshold, it can be seen with certainty that implementing the proposed project would not cause a significant adverse effect on the environment, and is therefore, exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3) – Common Sense Exemption; and

WHEREAS, the South Coast AQMD staff has prepared a Notice of Exemption for the proposed project that is completed in compliance with CEQA Guidelines Section 15062 – Notice of Exemption; and

WHEREAS, Proposed Amended Rule 1111, and supporting documentation, including but not limited to, the Notice of Exemption, the Final Staff Report, and the Board Letter were presented to the South Coast AQMD Governing Board and the South Coast AQMD Governing Board has reviewed and considered this information, as well as has taken and considered staff testimony and public comment prior to approving the project; and

WHEREAS, the South Coast AQMD Governing Board has determined that no socioeconomic assessment is required under Health and Safety Code Section 40440.8(a) because there are no adverse socioeconomic impacts; and further that the proposed amended rule does not “significantly affect air quality or emissions limitations;” and

WHEREAS, the South Coast AQMD Governing Board finds and determines, taking into consideration the factors in Section (d)(4)(D) of the Governing Board Procedures (Section 30.5(4)(D)(i) of the Administrative Code), that no modifications have been made to the proposed project since Notice of Public Hearing was published that are so substantial as to significantly affect the meaning of Proposed Amended Rule 1111 within the meaning of Health and Safety Code Section 40726 because: (a) the changes do not significantly impact emission reductions, (b) the changes do not affect the number or type of sources regulated by the rule, (c) the changes are consistent with the information contained in the notice of public hearing, and (d) the consideration of the range of CEQA alternatives is not applicable because the proposed project is exempt from CEQA; and

WHEREAS, Proposed Amended Rule 1111 will be submitted for inclusion into the State Implementation Plan; and

WHEREAS, Health and Safety Code Section 40727 requires that prior to adopting, amending, or repealing a rule or regulation, the South Coast AQMD 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 Final Staff Report; and

WHEREAS, the South Coast AQMD Governing Board has determined that a need exists to amend Rule 1111 to extend the mitigation fee alternative compliance option end date for mobile home furnaces; and

WHEREAS, the South Coast AQMD Governing Board obtains its authority to adopt, amend, or repeal rules and regulations from Health and Safety Code Sections 39002, 40000, 40001, 40440, 40702, 40725 through 40728, and 41508 as well as the federal Clean Air Act; and

WHEREAS, the South Coast AQMD Governing Board has determined that Proposed Amended Rule 1111 is written or displayed so that its meaning can be easily understood by the persons directly affected by it; and

WHEREAS, the South Coast AQMD Governing Board has determined that Proposed Amended Rule 1111 is in harmony with, and not in conflict with or contradictory to, existing statutes, court decisions, or federal or state regulations; and

WHEREAS, the South Coast AQMD Governing Board has determined that Proposed Amended Rule 1111 does not impose the same requirements as any existing state or federal regulations, and the proposed amended rule is necessary and proper to execute the powers and duties granted to, and imposed upon, the South Coast AQMD; and

WHEREAS, the South Coast AQMD Governing Board has determined that Proposed Amended Rule 1111 references the following statutes which the South Coast AQMD hereby implements, interprets or makes specific: Health and Safety Code Sections 40001(a) (rules to meet air quality standards); 40440(a) (rules to carry out the plan); and 40702 (adoption of rules and regulations); and

WHEREAS, the South Coast AQMD Governing Board finds that Proposed Amended Rule 1111 does not make an existing emission limit or standard more stringent, and therefore, the requirements of Health and Safety Code Section 40727.2 are satisfied; and

WHEREAS, the South Coast AQMD staff conducted a Public Consultation Meeting regarding Proposed Amended Rule 1111 on July 19, 2023; and

WHEREAS, a Public Hearing has been properly noticed in accordance with the provisions of Health and Safety Code Sections 40725 and 40440.5; and

WHEREAS, the South Coast AQMD Governing Board has held a Public Hearing in accordance with all provisions of state and federal law; and

WHEREAS, the South Coast AQMD Governing Board specifies the Planning and Rules Manager overseeing the rule development for Proposed Amended Rule 1111 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

NOW, THEREFORE, BE IT RESOLVED, that the South Coast AQMD Governing Board does hereby determine, pursuant to the authority granted by law, that

Proposed Amended Rule 1111 is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3) – Common Sense Exemption. This information was presented to the South Coast AQMD Governing Board, whose members exercised their independent judgment and reviewed, considered, and approved the information therein prior to acting on the proposed project; and

BE IT FURTHER RESOLVED, that the South Coast AQMD Governing Board does hereby adopt, pursuant to the authority granted by law, Proposed Amended Rule 1111, as set forth in the attachment, and incorporated herein by reference; and

BE IT FURTHER RESOLVED, that the South Coast AQMD Governing Board requests that Proposed Amended Rule 1111 be submitted into the State Implementation Plan; and

BE IT FURTHER RESOLVED, that the Executive Officer is hereby directed to forward a copy of this Resolution, Proposed Amended Rule 1111, and supporting documentation to the California Air Resources Board for approval and subsequent submittal to the U.S. Environmental Protection Agency for inclusion into the State Implementation Plan.

DATE: _____

CLERK OF THE BOARDS

(Adopted December 1, 1978)(Amended July 8, 1983)(Amended November 6, 2009)
(Amended September 5, 2014)(Amended March 2, 2018)(Amended July 6, 2018)
(Amended December 6, 2019)(Amended September 4, 2020)(Amended October 1, 2021)
(Amended [*Date of Rule Adoption*])

**PROPOSED AMENDED RULE 1111. **REDUCTION OF NO_x EMISSIONS
FROM NATURAL-GAS- FIRED, FAN-
TYPE CENTRAL FURNACES****

(a) Purpose and Applicability

The purpose of this rule is to reduce NO_x emissions from fan-type central furnaces, as defined in this rule. This rule applies to manufacturers, distributors, sellers, and installers of residential and commercial fan-type central furnaces, requiring either single-phase or three-phase electric supply, used for comfort heating with a rated heat input capacity of less than 175,000 BTU per hour, or, for combination heating and cooling units, a cooling rate of less than 65,000 BTU per hour.

(b) Definitions

- (1) ANNUAL FUEL UTILIZATION EFFICIENCY (AFUE) is defined in Section 10.1 of Code of Federal Regulations, Title 10, Part 430, Subpart B, Appendix N.
- (2) BTU means British thermal unit or units.
- (3) CONDENSING FURNACE means a high-efficiency furnace that uses a second heat exchanger to extract the latent heat in the flue gas by cooling the combustion gasses to near ambient temperature so that water vapor condenses in the heat exchanger, is collected and drained.
- (4) DOWNFLOW FURNACE means a condensing or non-condensing furnace installed in a configuration in which the furnace takes in cool air from the top, warms it, then releases the warm air through the ductwork below.
- (5) DUAL FUEL SYSTEM is a heating, ventilation, and air conditioning system utilizing a HEAT PUMP as the primary source of heating and cooling with a FAN-TYPE CENTRAL FURNACE serving as auxiliary heating.
- (6) FAN-TYPE CENTRAL FURNACE is a self-contained space heater using natural gas, or any fan-type central furnace that is in natural gas-firing mode, providing for circulation of heated air at pressures other than atmospheric through ducts more than 10 inches in length that have:

- (A) a RATED HEAT INPUT CAPACITY of less than 175,000 BTU per hour; or
 - (B) for combination heating and cooling units, a cooling rate of less than 65,000 BTU per hour.
- (7) HEAT INPUT means the higher heating value of the fuel to the furnace measured as BTU per hour.
 - (8) HEAT PUMP means an all-electric device that utilizes condensation and evaporation of refrigerant to absorb and release heat for heating, ventilation, and air conditioning applications.
 - (9) MOBILE HOME means a prefabricated structure on a permanently attached chassis.
 - (10) MOBILE HOME FURNACE means a furnace designed specifically and solely for installation to heat a mobile home.
 - (11) NO_x EMISSIONS means the sum of nitrogen oxide and nitrogen dioxide (oxides of nitrogen) in the flue gas, collectively expressed as nitrogen dioxide.
 - (12) RATED HEAT INPUT CAPACITY means the gross HEAT INPUT of the combustion device.
 - (13) RESPONSIBLE OFFICIAL means:
 - (A) For a corporation: a president or vice-president of the corporation in charge of a principal business function or a duly authorized person who performs similar policy-making functions for the corporation, or
 - (B) For a partnership or sole proprietorship: general partner or proprietor, respectively.
 - (14) SINGLE FIRING RATE means the burners and control system are designed to operate at only one fuel input rate and the control system cycles burners between the maximum heat output and no heat output.
 - (15) USEFUL HEAT DELIVERED TO THE HEATED SPACE is the AFUE (expressed as a fraction) multiplied by the heat input.
 - (16) VARIABLE FIRING RATE means the burners and control system are designed to operate at more than one fuel input rate and the control system cycles burners between two or more heat output rates and no heat output.
 - (17) WEATHERIZED means designed for installation outside of a building, equipped with a protective jacket and integral venting, and labeled for outdoor installation.

Rule PAR 1111 (Cont.) (~~Amended October 1, 2021~~)(Amended [*Date of Rule Adoption*])

(c) Requirements

- (1) A manufacturer shall not, after January 1, 1984, manufacture or supply for sale or use in the South Coast ~~Air Quality Management District~~AQMD fan-type central furnaces, unless such furnaces meet the requirements of paragraph (c)(3).
- (2) A person shall not, after April 2, 1984, sell or offer for sale within the South Coast ~~Air Quality Management District~~AQMD fan-type central furnaces unless such furnaces meet the requirements of paragraph (c)(3).
- (3) Fan-type central furnaces shall:
 - (A) not emit more than 40 nanograms of oxides of nitrogen (calculated as NO₂) per joule of useful heat delivered to the heated space; and
 - (B) be certified in accordance with subdivision (d) of this rule.
- (4) On or after October 1, 2012, a person shall not manufacture, supply, sell, offer for sale, or install, for use in the South Coast ~~Air Quality Management District~~AQMD, fan-type central furnaces subject to this rule, unless such furnace complies with the applicable emission limit and compliance date set forth in Table 1 and is certified in accordance with subdivision (d) of this rule.

Table 1 – Furnace NO_x Limits and Compliance Schedule

Compliance Date	Equipment Category	NO _x Emission Limit (nanograms/Joule *)
October 1, 2012	Mobile Home Furnace	40
April 1, 2015	Condensing Furnace	14
October 1, 2015	Non-condensing Furnace	14
October 1, 2016	Weatherized Furnace	14
October 1, 2018	Mobile Home Furnace	14

* Nanograms of oxides of nitrogen (calculated as NO₂) per joule of useful heat delivered to the heated space

- (5) Any manufacturer of fan-type central furnaces regulated by this rule may elect to pay a per unit mitigation fee in lieu of meeting the 14 nanogram/Joule NO_x emission limit in Table 1 of paragraph (c)(4) of this rule, provided the manufacturer complies with the following requirements:
 - (A) Prior to the phase one mitigation fee start date specified in Table 2, pays a per unit mitigation fee of \$200 for each condensing furnace

and \$150 for each other type of furnace distributed or sold into the South Coast AQMD, disregarding the furnace size.

- (B) On and after the phase one mitigation fee start date but no later than the mitigation fee option end date specified in Table 2, pays a per unit phase one or phase two mitigation fee for each condensing, non-condensing, weatherized or mobile home furnace according to Table 2.

Table 2 – Alternate Compliance Plan with the Phase One and Phase Two Mitigation Fee Schedules

Furnace		Phase One Mitigation Fee		Phase Two Mitigation Fee		Phase Two Mitigation Fee Option End Date
Size Range	Furnace Category	Phase One Mitigation Fee Start Date	Phase One Mitigation Fee (\$/Unit)	Phase Two Mitigation Fee Start Date	Phase Two Mitigation Fee (\$/Unit)	
≤ 60,000 BTU/hr	Condensing	May 1, 2018	\$275	October 1, 2018	\$350	September 30, 2019
	Non-condensing	October 1, 2018	\$225	April 1, 2019	\$300	September 30, 2019
	Weatherized	October 1, 2018	\$225	April 1, 2019	\$300	September 30, 2021
	Mobile Home	October 1, 2018	\$150	April 1, 2019	\$150	September 30, 2023 2025
> 60,000 Btu/hr and ≤ 90,000 BTU/hr	Condensing	May 1, 2018	\$300	October 1, 2018	\$400	September 30, 2019
	Non-condensing	October 1, 2018	\$250	April 1, 2019	\$350	September 30, 2019
	Weatherized	October 1, 2018	\$250	April 1, 2019	\$350	September 30, 2021
	Mobile Home	October 1, 2018	\$150	April 1, 2019	\$150	September 30, 2023 2025
> 90,000 BTU/hr	Condensing	May 1, 2018	\$325	October 1, 2018	\$450	September 30, 2019
	Non-condensing	October 1, 2018	\$275	April 1, 2019	\$400	September 30, 2019
	Weatherized	October 1, 2018	\$275	April 1, 2019	\$400	September 30, 2021
	Mobile Home	October 1, 2018	\$150	April 1, 2019	\$150	September 30, 2023 2025

- (C) Submits an alternate compliance plan for each 12-month time period after the applicable Table 1 compliance date during which

the manufacturer elects to pay the mitigation fee in lieu of meeting the NOx emission limit.

- (D) Submits to the South Coast AQMD an alternate compliance plan no later than 60 days prior to the applicable compliance date, or no later than March 16, 2018 for the condensing furnace compliance plan starting on April 1, 2018, which includes the following:
- (i) a letter with the name of the manufacturer requesting the mitigation fee compliance option signed by a responsible official identifying the category of fan-type central furnaces and the 12 month alternate compliance period that the mitigation fees cover;
 - (ii) an estimate of the quantity of applicable Rule 1111 fan-type central furnaces to be distributed or sold into the South Coast AQMD during the alternate compliance period, which estimate shall be based on total distribution and sales records or invoices of weatherized or mobile home fan-type central furnaces that were distributed or sold into the South Coast AQMD during the 12 month period of July 1 to June 30 prior to the applicable compliance date, along with supporting documentation;
 - (iii) a completed South Coast AQMD Form 400A with company name, identification that application is for an alternate compliance plan (section 7 of form), identification that the request is for the Rule 1111 mitigation fee compliance option (section 9 of form), and signature of the responsible official;
 - (iv) a check for payment of the alternate compliance plan filing fee (Rule 306, subdivision (c)).
- (E) Submits to the Executive Officer a report signed by the responsible official for the manufacturer identifying by model number the quantity of Rule 1111 fan-type central furnaces actually distributed or sold into South Coast AQMD and a check for payment of mitigation fees for the applicable 12 month alternate compliance period for the quantity of applicable Rule 1111 fan-type central furnaces distributed or sold into the South Coast AQMD during the alternate compliance period. The report and the payment of

mitigation fees must be submitted to the South Coast AQMD no later than thirty (30) days after the end of each 12-month mitigation fee alternate compliance period.

- (F) Notwithstanding the requirements set forth in subparagraph (c)(5)(E), during the phase one period specified in Table 2, submits a report signed by the responsible official for the manufacturer identifying by model number the quantity of Rule 1111 fan-type central furnaces actually distributed or sold into South Coast AQMD and a check for payment of mitigation fees for the phase one period no later than thirty (30) days after the end of the phase one period. The 12-month compliance plan payment as specified in subparagraph (c)(5)(E) that includes this phase one period shall be reconciled so as not to include the phase one payment.
 - (G) For the last and remaining 6-month period of the condensing furnace final alternate compliance plan ending on September 30, 2019, specified in Table 2, submits a report signed by the responsible official for the manufacturer identifying by model number the quantity of Rule 1111 fan-type central furnaces - condensing furnaces actually distributed or sold into South Coast AQMD and a check for payment of mitigation fees to the South Coast AQMD no later than October 30, 2019.
- (d) Certification
- (1) The manufacturer shall have each appliance model tested in accordance with the following:
 - (A) Oxides of nitrogen measurements, test equipment, and other required test procedures shall be in accordance with South Coast AQMD Method 100.1.
 - (B) Operation of the furnace shall be in accordance with the procedures specified in Section 4.0 of Code of Federal Regulations, Title 10, Part 430, Subpart B, Appendix N.
 - (2) One of the two formulas shown below shall be used to determine the nanograms of oxides of nitrogen per joule of useful heat delivered to the heated space:

Rule PAR 1111 (Cont.) (~~Amended October 1, 2021~~)(Amended [*Date of Rule Adoption*])

$$N = \frac{4.566 \times 10^4 \times P \times U}{H \times C \times E}$$

$$N = \frac{3.655 \times 10^{10} \times P}{(20.9 - Y) \times Z \times E}$$

Where:

N = nanograms of emitted oxides of nitrogen per joule of useful heat.

P = concentration (ppm volume) of oxides of nitrogen in flue gas as tested.

U = volume percent CO₂ in water-free flue gas for stoichiometric combustion.

H = gross heating value of fuel, BTU/cu.ft. (60°F, 30-in. Hg).

C = measured volume percent of CO₂ in water-free flue gas, assuming complete combustion and no CO present.

E = AFUE, percent

Y = volume percent of O₂ in flue gas.

Z = heating value of gas, joules/cu. meter (0.0°C, 1 ATM).

- (3) Prior to the date a furnace model is first shipped to a location in the South Coast AQMD for use in the ~~District~~ South Coast AQMD, the manufacturer shall obtain Executive Officer's approval for the emission test protocol and emission test results verifying compliance with the applicable NO_x limit specified in Table 1, submitting the following:

(A) A statement that the model is in compliance with subdivision (c). (The statement shall be signed by a responsible official and dated, and shall attest to the accuracy of all statements.)

(B) General Information

(i) Name and address of manufacturer.

(ii) Brand name.

(iii) Model number, as it appears on the furnace rating plate.

(C) A description of the furnace and specifications for each model being certified.

(e) Identification of Compliant Units

- (1) The manufacturer of the furnace complying with subdivisions (c) and (d) shall display the following on the shipping container label and rating plate of the furnace:

(A) Model number;

(B) Heat input capacity;

(C) Applicable NO_x emission limit in Table 1; and

Rule PAR 1111 (Cont.) (~~Amended October 1, 2021~~)(Amended [*Date of Rule Adoption*])

- (D) Date of manufacture or date code.
- (2) Any non-certified furnace shipped to a location in the South Coast Air Quality Management District AQMD for distribution or sale outside of the ~~District~~ South Coast AQMD shall have a label on the shipping container identifying the furnace as not certified for use in the ~~District~~ South Coast AQMD.
- (3) Consumer Notification Requirement
 - (A) For the purposes of subparagraph (e)(3)(B), “Informative Materials” shall mean the following:
 - (i) The consumer brochure for the furnace;
 - (ii) The technical specification sheet for the furnace; and
 - (iii) The manufacturer’s website that promotes, discusses, or lists the furnace.
 - (B) Effective October 1, 2018, for any furnace that is for distribution or sale inside of the South Coast that is using an alternate compliance plan in lieu of meeting the 14 ng/J certification limit, a manufacturer shall only distribute or publish Informative Materials that clearly display the following language: “If installed in South Coast AQMD only: This furnace does not meet the South Coast AQMD Rule 1111 NOx emission limit (14 ng/J), and thus is subject to a mitigation fee of up to \$450. This furnace is not eligible for the Clean Air Furnace Rebate Program: www.CleanAirFurnaceRebate.com.”
 - (C) A manufacturer may use alternative language in lieu of subparagraph (e)(3)(B), provided the alternative language is:
 - (i) Similar to the language in subparagraph (e)(3)(B);
 - (ii) Submitted to the Executive Officer by August 1, 2018; and
 - (iii) Approved by the Executive Officer no later than August 31, 2018.The manufacturer shall use the language in subparagraph (e)(3)(B) if the alternative language is not approved.
- (f) Enforcement

The Executive Officer may periodically conduct such tests as are deemed necessary to ensure compliance with subdivisions (c), (d), and (e).

(g) Exemptions

- (1) The provisions of this rule shall not apply to furnaces installed in mobile homes before October 1, 2012.
- (2) For furnaces manufactured, purchased, and delivered to the South Coast Air Quality Management District AQMD prior to the applicable compliance date in Table 1, any person may, until 300 days after the applicable compliance date, sell, offer for sale, or install such a furnace in the ~~District~~ South Coast AQMD, so long as the furnace meets the requirements of paragraph (c)(3) and subdivisions (d) and (e).
- (3) For furnaces that have been encumbered in a contractual agreement, signed prior to January 1, 2018, by a furnace manufacturer or distributor for future or planned construction, the manufacturer shall be allowed to sell the units within the South Coast AQMD at the mitigation fee specified in subparagraph (c)(5)(A), provided:
 - (A) An application for exemption is submitted to the Executive Officer prior to April 2, 2018;
 - (B) The total quantity of furnaces in application(s) by any one manufacturer does not exceed 15% percent of furnaces distributed and sold in the previous compliance plan period;
 - (C) Those furnaces are sold no later than their mitigation fee option end dates specified in Table 2; and
 - (D) The following documents and information are provided to the Executive Officer, including but not limited to:
 - (i) contractual agreement for the units sold or to be sold in the ~~District~~ South Coast AQMD;
 - (ii) quantity, model number, and serial number of the subject units;
 - (iii) contract execution date; and
 - (iv) name(s) of the contractor (s).
 - (E) Failure to comply with the requirements specified in subparagraphs (g)(3)(A) through (g)(3)(D) shall result in the requirement to paying or retroactively paying the corresponding mitigation fee specified in paragraph (c)(5) within 30 days upon notification from the Executive Officer.
- (4) The manufacturer of any natural gas furnace that is not certified to meet 14-ng/J of NOx emission and is to be installed with a propane conversion

kit for propane firing only in the South Coast AQMD, is exempt from subdivisions (c) and (d), provided:

- (A) Effective June 1, 2018, the shipping carton or the name plate of the furnace clearly displays: "This furnace is to be installed for propane firing only. Operating in natural gas mode is in violation of the South Coast AQMD Rule 1111."
 - (B) The following documents and information shall be provided to the Executive Officer, accompanying the compliance plan report specified in subparagraphs (c)(5)(E), (c)(5)(F), and (c)(5)(G), including but not limited to:
 - (i) The quantity of propane conversion kits for furnaces actually distributed or sold into South Coast AQMD for the applicable compliance plan period;
 - (ii) The quantity of propane conversion kits for furnaces distributed or sold into the South Coast AQMD during the 12 month period of July 1 to June 30 prior to the applicable compliance date; and
 - (iii) Photographic evidence of the required language set forth in subparagraph (g)(4)(A) as it appears on the carton or unit, including all versions utilized by the manufacturer, for approval by the Executive Officer. The photographs must be sufficient to verify the wording is correct and that it is "clearly visible," taking into account the font type, size, color, and location on the carton or unit.
 - (C) The manufacturer of this type of unit which has been installed in the South Coast AQMD without meeting above requirements shall be in violation of South Coast AQMD Rule 1111.
- (5) Condensing or non-condensing furnaces that are certified to meet the 40 ng/J NO_x limit and are installed at or above 4,200 feet above sea level are exempt from paragraph (c)(4), if that unit is installed on or before March 31, 2022.
 - (6) Effective April 1, 2022, downflow furnaces rated less than 175,000 BTU per hour in heat input capacity and condensing or non-condensing furnaces with rated heat input at or greater than 100,000 BTU per hour, either of which are installed at elevations at or above 4,200 feet above sea level as a

replacement for an existing furnace are exempt from paragraph (c)(4), provided that:

- (A) The downflow furnace is certified to meet the 40 ng/J NO_x limit, is replacing an existing furnace, and the shipping carton or name plate of the furnace clearly displays: "This furnace must be installed only as a replacement in a downflow configuration at or above 4,200 feet above sea level in the South Coast AQMD. Installation of this furnace for new construction, in any other configuration, or at a lower elevation will be a violation of South Coast AQMD Rule 1111."; or
 - (B) The condensing or non-condensing furnace rated at or greater than 100,000 BTU per hour in heat input capacity is certified to meet 40 ng/J NO_x limit, is replacing an existing furnace, and the shipping carton or name plate of the furnace clearly displays: "This furnace must be installed only as a replacement at or above 4,200 feet above sea level in the South Coast AQMD. Installation of this furnace for new construction or at a lower elevation will be a violation of South Coast AQMD Rule 1111."
- (7) Effective April 1, 2022 and until September 30, 2022, a manufacturer, distributor, or installer that manufactures, supplies, sells, offers for sale, or installs a natural gas furnace certified to meet 40 ng/J of NO_x that is installed and operated as part of a dual fuel system at or above 4,200 feet above sea level in the South Coast AQMD, shall only install such a unit that:
- (A) Is designed by the manufacturer with a system switchover point between heat pump and furnace at the external temperature of 32°F with a nonadjustable system that would prevent any person from changing the external ambient switchover temperature of 32°F;
 - (B) Includes installation of an external temperature sensor which acts as the sole method to determine switchover point;
 - (C) For systems equipped with condensing, noncondensing, or mobile home furnaces, includes communicating technology between the heat pump and furnace installed at the point of manufacture to prevent system operation without a heat pump and requires operations of only the heat pump at and above the switchover temperature outlined in (g)(7)(A); and

- (D) The shipping carton or the name plate of the furnace clearly displays: "This furnace must be installed only in a dual fuel configuration with an electric heat pump. Installation of this furnace without a heat pump in a dual fuel configuration will be a violation of South Coast AQMD Rule 1111."
- (8) The manufacturer of any furnace that elects to use the exemption in paragraph (g)(4), (g)(5), (g)(6), or (g)(7) shall record the following information and shall make this information available upon request to the Executive Officer:
 - (A) Sales date to distributor;
 - (B) Distributor's name and full contact information (address and phone number);
 - (C) Model number of the furnace and heat pump (if applicable); and
 - (D) Serial number of the furnace and heat pump (if applicable).
- (9) The distributor that elects to use the exemption in paragraph (g)(4), (g)(5), (g)(6), or (g)(7) shall record the following information and shall make this information available upon request to the Executive Officer:
 - (A) Sales date to installer;
 - (B) Installer's name and full contact information (address and phone number);
 - (C) Model number of the furnace and heat pump (if applicable); and
 - (D) Serial number of the furnace and heat pump (if applicable).
- (10) The installer that elects to use the exemption in paragraph (g)(4), (g)(5), (g)(6), or (g)(7) shall record the following information and shall make this information available upon request to the Executive Officer:
 - (A) Installation date;
 - (B) Address of furnace installation;
 - (C) Model number of the furnace and heat pump (if applicable); and
 - (D) Serial number of the furnace and heat pump (if applicable).

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Final Staff Report Proposed Amended Rule 1111 – Reduction of NO_x Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces

September 2023

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EXECUTIVE SUMMARY

Rule 1111 – Reduction of NO_x Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces (Rule 1111) reduces emissions of nitrogen oxides (NO_x) from residential and commercial gas-fired fan-type space heating furnaces with a rated heat input capacity of less than 175,000 British thermal units (Btu) per hour, or, for combination heating and cooling units, with a cooling rate of less than 65,000 Btu per hour.

Rule 1111 was adopted by the South Coast Air Quality Management District (South Coast AQMD) Governing Board in December 1978. The rule was amended in 2009 to lower the NO_x emissions limit from 40 to 14 nanograms per Joule (ng/J). The rule was later amended in 2014 to provide an alternate compliance option that allows the manufacturer to pay a per-unit mitigation fee, in lieu of meeting the lower NO_x emission limit, for up to 36 months past the applicable compliance date. Since then, the rule was amended several times to postpone the compliance dates to meet the 14 ng/J NO_x limit and extend the eligibility date for the mitigation fee alternate compliance option.

Mobile home (also known as manufactured home) furnaces, which constitute about four percent of the Rule 1111 furnace sales within the South Coast AQMD, will be required to comply with the 14 ng/J NO_x emission limit after September 30, 2023, when their mitigation fee alternate compliance option ends. Currently none of the manufacturers have made any progress on the development of compliant mobile home furnaces. Manufacturers stated that no development of models compliant with the 14 ng/J NO_x emission limit were planned due to the low volume of mobile home furnaces sold in the South Coast AQMD, challenges of meeting additional regulations, and future policy direction to analyze the feasibility of zero-emission NO_x limits. Manufacturers, distributors, and installers have stated that they will not be able to meet the September 30, 2023, compliance date for mobile home furnaces. All other furnace types meet the 14 ng/J limit.

Staff is proposing to extend the mitigation fee alternate compliance option for mobile home furnaces by two years. Manufacturers would continue to be allowed to comply by paying the mitigation fee for 40 ng/J NO_x units with recordkeeping and reporting requirements until September 30, 2025.

Following this proposed rule amendment, staff intends to commence another rule development to evaluate the feasibility of requiring zero-emission NO_x technologies for residential and commercial buildings, including for mobile home heating units, and propose appropriate compliance dates to meet potentially lower emission standards. The development of zero-emission standards will implement Control Measure R-CMB-02 for zero-emission residential space heating, which was included in the 2022 Air Quality Management Plan (AQMP) and adopted by the South Coast AQMD Governing Board in December 2022. Control Measure R-CMB-02 sets the policy direction for Rule 1111 to align with California's zero-emission pathway for residential and commercial buildings.

CHAPTER 1: BACKGROUND

INTRODUCTION

REGULATORY HISTORY

EQUIPMENT AND PROCESS

REQUIREMENT AND TESTS FOR NEW TECHNOLOGY

AFFECTED INDUSTRIES

NEED FOR PROPOSED AMENDMENTS

PUBLIC PROCESS

INTRODUCTION

The purpose of Rule 1111 is to reduce NO_x emissions from residential and commercial gas-fired fan-type space heating furnaces with a rated heat input capacity of less than 175,000 Btu per hour or, for combination heating and cooling units, with a cooling rate of less than 65,000 Btu per hour. The rule applies to manufacturers, distributors, and installers of such furnaces and requires manufacturers to certify that each furnace model offered for sale in the South Coast AQMD complies with the emission limit using the test methods approved by the South Coast AQMD and U.S. EPA. In lieu of meeting the lower emission limit, Rule 1111 includes an alternate compliance option that allows manufacturers to pay a per-unit mitigation fee for up to four to five years past the applicable compliance date, depending on the furnace type, which includes non-condensing, condensing, weatherized, and mobile home furnaces. Most single-family homes, many multi-unit residences, and some light commercial building in the South Coast AQMD use this type of space heating equipment.

REGULATORY HISTORY

Rule 1111 was adopted by the South Coast AQMD Governing Board in December 1978. The original rule required residential and commercial space heating furnaces to meet a NO_x emission limit of 40 ng/J of heat output, which equivalent to a concentration of 61 parts per million (ppm) at a reference level of 3 percent oxygen and 80 percent Annual Fuel Utilization Efficiency (AFUE), beginning January 1, 1984.

New Lower NO_x Emission Limit of 14 ng/J Established

Rule 1111 was amended in November 2009 to implement the 2007 AQMP Control Measure CMB-03. The 2009 amendment established a new lower NO_x emission limit of 14 ng/J (equivalent to 22 ppm at a reference level of 3 percent oxygen and 80 percent AFUE) and required the three major categories of residential furnaces – condensing (high efficiency), non-condensing (standard), and weatherized furnaces to meet the new limit by October 1, 2014, October 1, 2015, and October 1, 2016, respectively. Furthermore, new mobile home heating units, which were unregulated prior to the 2009 amendment, were required to meet a NO_x limit of 40 ng/J by October 1, 2012, and 14 ng/J by October 1, 2018. To facilitate the depletion of existing inventories and to ensure a smooth transition to the new limits, Rule 1111 also provided a temporary 10-month exemption (e.g., a sell-through period) for units manufactured and delivered into the South Coast AQMD prior to the compliance date.

Mitigation Fee to Delay Compliance of 14 ng/J Furnaces

Rule 1111 was amended in September 2014 to delay the compliance date for condensing furnaces and to provide an alternate compliance option. The alternate compliance option allowed original equipment manufacturers (OEM) to pay a per-unit mitigation fee of \$200 for each condensing furnace and \$150 for each other type of furnace distributed or sold in South Coast AQMD, in lieu of meeting the 14 ng/J NO_x emission limit. The mitigation fee end date was based on the furnace type, which phased in the NO_x limit of 14 ng/J over the period from April 1, 2018, to October 1, 2021.

Extension and Increase of the Mitigation Fee

Rule 1111 was again amended in March 2018 because of the lack of commercially available 14 ng/J furnaces in early 2018. The amendment increased the mitigation fee in two phases to a range of \$300 to \$450, depending on the furnace type and heat input capacity, and extended the

mitigation fee compliance option by one and a half years for condensing furnaces, and one year for non-condensing and weatherized furnaces. Rule 1111 was also amended to provide an exemption from the mitigation fee increase for units encumbered in a contractual agreement by OEMs and distributors for new construction, if contracts were signed prior to January 1, 2018, and included provisions to address propane conversion kits for propane-fired only furnaces.

Clean Air Furnace Rebate Program

In March 2018, the South Coast AQMD developed a rebate program for consumers who purchased and installed future compliant 14 ng/J furnaces in the South Coast AQMD. The purpose of the rebate program was to help commercialize future compliant furnaces and incentivize consumers to purchase and install them. On May 4, 2018, the South Coast AQMD executed the contract with Electric & Gas Industries Association (EGIA) to administer the Clean Air Furnace Rebate Program. On June 28, 2018, the rebate website was launched. The South Coast AQMD Governing Board initially approved funding of \$3 million for the furnace rebate program, specifying a \$500 rebate for each compliant furnace. In September 2020, the Governing Board approved additional funding of \$3.5 million, modifying the program to specify a \$500 rebate for up to 600 compliant weatherized furnaces, a \$500 rebate for up to 200 high-altitude compliant condensing or non-condensing furnace installations, and a \$1,500 rebate for each all-electric heat pump for central ducted space heating. Rebates for weatherized and high-altitude condensing and non-condensing furnaces ended on September 30, 2021, when remaining funds for those categories were reallocated for all-electric heat pump systems. Rebates for all-electric heat pump systems concluded in April of 2023 when funds were exhausted. The Clean Air Furnace Rebate Program incentivized the installation of over 2,400 heat pump installations, with 25 percent of funds allocated to low income and disadvantaged communities.

High-Altitude Furnaces Temporary Exemption and Extension

Rule 1111 was amended in December 2019 to include a temporary exemption from the 14 ng/J NOx emission limit for condensing and non-condensing natural gas furnaces installed at elevations greater than or equal to 4,200 feet above sea level until September 30, 2020. During this interim exemption period, condensing and non-condensing furnaces installed in high-altitude areas were still required to meet the 40 ng/J NOx emission limit. Rule 1111 was again amended in September 2020 to extend this exemption for one year, until September 30, 2021.

Further Extension of the Mitigation Fee Option for Weatherized Furnaces

The September 2020 Rule 1111 amendment also extended the mitigation fee compliance option by one year for weatherized furnaces, until September 30, 2021. As for high-altitude furnaces, the extension was to address the adverse impact of the COVID-19 pandemic on their development and commercialization.

Further Extension of High Altitude and Mobile Home Furnaces

The most recent Rule 1111 amendment in October 2021 further extended the mobile home furnace mitigation fee compliance option by two years, until September 30, 2023. High-altitude furnaces were allowed to be installed until March 31, 2022, with an exemption for downflow furnaces rated less than 175,000 Btu per hour and condensing and non-condensing furnaces greater than 100,000 Btu per hour replacing existing furnaces until September 30, 2022.

2022 AQMP Control Measure

In the 2022 AQMP, the Governing Board adopted control measure R-CMB-02: Emission Reductions from Replacement with Zero Emission or Low NOx Appliances – Residential Space

Heating. This control measure proposed the development of zero-emission NO_x limits for residential space heating when feasible. The 2022 AQMP Policy Brief for Residential and Commercial Building Appliances¹ cited heat pumps as an energy-efficient zero-emission alternative to natural gas furnaces.

EQUIPMENT AND PROCESS

Fan-type gas-fired furnaces heat a building by circulating air from inside the building (office, home, apartment, etc.) through the furnace. In a fan-type furnace, air is heated when it passes through a heat exchanger. Combustion gases heat up the inside of the heat exchanger, and air from the building that is moving past the outside of the heat exchanger removes heat from the outside surface. A blower (fan) pulls air through one or more intake ducts and pushes the air past the heat exchanger and through another set of ducts, which direct the heated air to different parts of the building. The heated air circulates through the building before it is again pulled into the intake ducts and re-heated. This process continues until a specific temperature is detected by a thermostat in the building, which then shuts off the furnace. When the temperature at the thermostat goes below a set point, the thermostat sends a signal for the furnace to turn on.

Rule 1111 categorizes furnaces into four types: non-condensing, condensing, weatherized, and mobile home furnaces. Condensing furnaces, also called high-efficiency furnaces, utilize a second heat exchanger to recover the latent heat in the flue gas, achieving 90 to 98 percent fuel efficiency. Non-condensing furnaces only use one heat exchanger, with a typical fuel efficiency of about 80 percent. Weatherized furnaces are designed for installation outside of a building, equipped with a protective jacket and integral venting, and labeled for outdoor installation. A weatherized furnace, often referred to as a package unit, is packaged with an air conditioning condensing unit. A mobile home furnace (also known as manufactured homes) means a furnace designed specifically and solely for installation to heat a mobile home. Most mobile homes are designed to accommodate a smaller furnace, usually in a downflow configuration.² A downflow furnace draws the air from the top of the unit down through the combustion unit, usually to ducting below. The U.S. Department of Housing and Urban Development (HUD) regulates manufactured homes, which they defined as a factory-built home built after June 15, 1976. They define a factory-built home built prior to June 15, 1976, as a mobile home. New manufactured home gas furnaces must be approved by HUD and must include propane kits for compliant split systems to meet HUD requirement for propane compatibility³. These requirements generally mean non-mobile home furnaces cannot be used in a mobile home without retrofits.

REQUIREMENTS AND TESTS FOR NEW TECHNOLOGY

Gas furnaces in the United States must meet the ANSI Z21.47/CSA 2.3 standard referred as CSA certification, mainly to ensure safety. To be sold and installed in the South Coast AQMD's jurisdiction, they must also be certified by the South Coast AQMD for Rule 1111 NO_x emission limit compliance by specific test methods approved by the South Coast AQMD and U.S. EPA. OEMs could also be subject to other regulations, such as ANSI/ASHRAE/IES 90.1-2013, Energy Standard for Buildings Except Low-Rise Residential building required by the U.S. Department of Energy (DOE), and Air-Conditioning, Heating, and Refrigeration Institute (AHRI) certification

¹ http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/buildings_final.pdf

² <https://mobilehomeliving.org/mobile-home-furnaces/>

³ CFR Title 24 Part 3280, incorporating ANSI Z21.47-1990, <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-XX/part-3280>

program for verification test of output heating capacity and annual fuel utilization efficiency. For furnace installation, manufacturers provide extensive training programs and instruction material for the contractors and installers.

AFFECTED INDUSTRIES

Proposed Amended Rule 1111 (PAR 1111) affects manufacturers (NAICS 333), distributors and wholesalers (NAICS 423), and retailers and dealers (NAICS 444) of residential furnaces. PAR 1111 also affects construction and building contractors and installers (NAICS 238 and 811) because heating units regulated by the rule are used in most residential and many commercial settings for heating small buildings. AHRI, the major manufacturer's trade organization, indicates there are no manufacturers of fan-type gas-fired residential furnaces in the South Coast AQMD. However, these companies do maintain regional sales offices and distribution centers in the South Coast AQMD and there are manufacturers of other types of heating furnaces in the South Coast AQMD.

NEED FOR PROPOSED AMENDMENTS

As part of the implementation status monitoring, staff has been regularly reaching out to manufacturers for their progress on developing and commercializing compliant mobile home furnaces.

In the South Coast AQMD residential space heating market, about four percent are mobile home furnaces, which are currently supplied by three manufacturers. Mobile home furnaces are specifically and solely for installation to heat mobile homes. A mobile home furnace may be a split system, in which the furnace and air conditioner are separated as indoor and outdoor units, respectively. It can also be a weatherized system, in which the furnace and air conditioner are packaged and installed as one outdoor system.

The mitigation fee period for mobile home furnaces ends on September 30, 2023, after which the 14 ng/J NO_x limit will be applicable. Currently none of the three mobile home manufacturers have made progress on the development of mobile home furnaces so no natural gas units are available to meet the upcoming 14 ng/J NO_x emission limit as required by the rule. In addition, the manufacturers are considering the business feasibility of investing in the lower NO_x emission technology for mobile home furnaces at this time; instead, they may consider putting resources toward electric heating such as heat pumps. While some zero-emission technologies are currently available, the market adoption for mobile homes is very limited. In addition, more time is needed to develop, test, and implement the zero-emission technology for broader mobile home applications. Feasibility of zero-emission technology may vary between new mobile homes whose design has not yet been formulated and existing homes whose footprint has already been established. Regardless, time is needed to develop, test, and implement; therefore, staff is proposing this rule amendment.

PUBLIC PROCESS

Staff has been holding ongoing individual meetings with manufacturers and environmental groups to monitor the rule implementation status. The discussions at these meetings included rule implementation status for compliant 14 ng/J mobile home furnaces, as well as future proposed zero-emission standards. A Public Consultation meeting was held on July 19, 2023.

CHAPTER 2: SUMMARY OF PROPOSALS

INTRODUCTION

PROPOSED AMENDED RULE 1111

INTRODUCTION

Staff has been closely monitoring the progress of development and commercialization of future compliant mobile home furnaces; however, based on the implementation status, staff is proposing to extend the compliance date for mobile home furnaces by two years.

PROPOSED AMENDED RULE 1111**Rule 1111 Requirements**

Extending the mitigation fee alternate compliance option for mobile home furnaces until September 30, 2025

PAR 1111 proposes to extend the mitigation fee period for mobile home furnaces from September 30, 2023 to September 30, 2025, which is included in Table 2 in PAR 1111 and presented show below as Table 1. This proposal does not change the requirements for the mitigation fee or the recordkeeping and reporting requirements.

Table 1 – Alternate Compliance Plan with the Phase One and Phase Two Mitigation Fee Schedules

Furnace		Phase One Mitigation Fee		Phase Two Mitigation Fee		Phase Two Mitigation Fee Option End Date
Size Range	Furnace Category	Phase One Mitigation Fee Start Date	Phase One Mitigation Fee (\$/Unit)	Phase Two Mitigation Fee Start Date	Phase Two Mitigation Fee (\$/Unit)	
≤ 60,000 Btu/hr	Condensing	May 1, 2018	\$275	October 1, 2018	\$350	September 30, 2019
	Non-condensing	October 1, 2018	\$225	April 1, 2019	\$300	September 30, 2019
	Weatherized	October 1, 2018	\$225	April 1, 2019	\$300	September 30, 2021
	Mobile Home	October 1, 2018	\$150	April 1, 2019	\$150	September 30, 2023 <u>2025</u>
> 60,000 Btu/hr and ≤ 90,000 Btu/hr	Condensing	May 1, 2018	\$300	October 1, 2018	\$400	September 30, 2019
	Non-condensing	October 1, 2018	\$250	April 1, 2019	\$350	September 30, 2019
	Weatherized	October 1, 2018	\$250	April 1, 2019	\$350	September 30, 2021
	Mobile Home	October 1, 2018	\$150	April 1, 2019	\$150	September 30, 2023 <u>2025</u>

Furnace		Phase One Mitigation Fee		Phase Two Mitigation Fee		Phase Two Mitigation Fee Option End Date
Size Range	Furnace Category	Phase One Mitigation Fee Start Date	Phase One Mitigation Fee (\$/Unit)	Phase Two Mitigation Fee Start Date	Phase Two Mitigation Fee (\$/Unit)	
> 90,000 Btu/hr	Condensing	May 1, 2018	\$325	October 1, 2018	\$450	September 30, 2019
	Non-condensing	October 1, 2018	\$275	April 1, 2019	\$400	September 30, 2019
	Weatherized	October 1, 2018	\$275	April 1, 2019	\$400	September 30, 2021
	Mobile Home	October 1, 2018	\$150	April 1, 2019	\$150	September 30, 2023 <u>2025</u>

CHAPTER 3: IMPACT ASSESSMENT

INTRODUCTION

EMISSION IMPACTS

COST EFFECTIVENESS

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

SOCIOECONOMIC IMPACT ASSESSMENT

DRAFT FINDINGS UNDER HEALTH AND SAFETY CODE SECTION 40727

INCREMENTAL COST-EFFECTIVENESS

COMPARATIVE ANALYSIS

INTRODUCTION

Rule 1111 reduces emissions of NO_x from residential and commercial gas-fired fan-type space heating furnaces, and is applicable to manufacturers, distributors, and installers of those type of furnaces. The proposed rule-amendments does not seek further emission reductions; ~~the proposed amendment proposes~~ PAR 1111 seeks to extend the mitigation fee period for mobile home furnaces which will delay some emission reductions.

EMISSION IMPACTS

Based on the 2022 AQMP emission inventory for fuel consumption, the annual average NO_x emissions from residential heating using natural gas were 11.67 tons per day (tpd) in 2018. Staff estimates that there are about four million residential type heating furnaces in the South Coast AQMD. Based on a furnace life of 25 years, a typical furnace emits approximately one and a half to two pounds of NO_x per year. The emission rate reduction from 40 ng/J to 14 ng/J results in more than one pound per year of NO_x emission reductions for each furnace.

Total mobile home furnace annual sales are estimated at 6,000 units in the South Coast AQMD. A two-year delay in compliance would result in an estimated 0.016 tpd of delayed emission reductions [calculated as: $(2 \times 6,000 \times 1.0)/(2,000 \times 365)$]. The future rule development for zero-emissions could potentially reduce the overall amount of delayed emission reductions.

COST-EFFECTIVENESS

A cost-effectiveness analysis is not required for PAR 1111 as the proposed amendments does not impose additional requirements on manufacturers, distributors, wholesalers, retailers, and dealers of residential furnaces.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

Pursuant to the California Environmental Quality Act (CEQA) Guidelines Sections 15002(k) and 15061, the proposed project (PAR 1111) is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3). A Notice of Exemption ~~will be~~ has been prepared pursuant to CEQA Guidelines Section 15062, and if the proposed project is approved, the Notice of Exemption will be filed for posting with the State Clearinghouse of the Governor's Office of Planning and Research, and with the county clerks of Los Angeles, Orange, Riverside, and San Bernardino Counties.

SOCIOECONOMIC IMPACT ASSESSMENT

PAR 1111 is not expected to result in emission reductions and will not significantly affect air quality or emission limits. Therefore, a socioeconomic impact assessment is not required under Health and Safety Code Sections 40440.8 and 40728.5.

DRAFT FINDINGS UNDER HEALTH AND SAFETY CODE SECTION 40727

Health and Safety Code Section 40727 requires that prior to adopting, amending, or repealing a rule or regulation, the South Coast AQMD 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. In order to determine compliance with Health and Safety Code Section 40727, Health and Safety Code Section 40727.2 requires a written analysis comparing the proposed amended rule with existing regulations, if the rule meets certain requirements.

The following provides the draft findings.

Necessity: A need exists to amend Rule 1111 to extend the mitigation fee alternate compliance option for mobile home furnaces.

Authority: The South Coast AQMD obtains its authority to adopt, amend, or repeal rules and regulations from Health and Safety Code Sections 39002, 40000, 40001, 40440, 40702, 40725 through 40728, 41508, and 41700.

Clarity: PAR 1111 has been written or displayed so that its meaning can be easily understood by the persons affected by the rule.

Consistency: PAR 1111 is in harmony with, and not in conflict with or contradictory to, existing federal or state statutes, court decisions, or federal regulations.

Non-Duplication: PAR 1111 does not impose the same requirement as any existing state or federal regulation and is necessary and proper to execute the powers and duties granted to, and imposed upon, the South Coast AQMD.

Reference: In amending this rule, the South Coast AQMD hereby implements, interprets, or makes specific reference to the following statutes: Health and Safety Code Sections 39002, 40001, 40702, 40440(a), and 40725 through 40728.5.

INCREMENTAL COST-EFFECTIVENESS

Health and Safety Code Section 40920.6 requires an incremental cost-effectiveness analysis for Best Available Retrofit Control Technology (BARCT) rules or emission reduction strategies when there is more than one control option that would achieve the emission reduction objective of the proposed amendments, relative to ozone, carbon monoxide, sulfur oxides, NO_x, and their precursors. The proposed amendment does not include new BARCT requirements; therefore, this provision does not apply to the proposed amendment.

COMPARATIVE ANALYSIS

Health and Safety Code Section 40727.2(g) which requires a comparative analysis is applicable when a proposed amended rule or regulations imposes, or has the potential to impose, a new emissions limit or standard, or increased monitoring, recordkeeping, or reporting requirements. In this case for PAR 1111, a comparative analysis is not required because the amendments do not impose such requirements.

APPENDIX A: COMMENTS AND RESPONSES

RESPONSE TO THE PUBLIC COMMENTS

RESPONSE TO PUBLIC COMMENTS

South Coast AQMD staff held a Public Consultation Meeting on July 19, 2023, via Zoom video conference. The following public comments were received during the meeting, and no comment letters were received during the comment period.

The following responses summarize the key comments received during the Public Consultation Meeting:

Comment #PC-1: Jed Holtzman on behalf of the Rocky Mountain Institute and Fernando Gayton from Earthjustice both commented that staff should increase the mitigation fee for 40 ng/J mobile home furnaces alongside the schedule extension. An increased mitigation fee would discourage manufacturers from selling more 40 ng/J mobile home furnaces, while at the same time increasing funding for zero-emission appliance rebate programs.

Response #PC-1: Staff appreciates the commenter's suggestion; however, increasing the mitigation fee may not be leverage for manufacturers to develop lower emission technologies. Staff recognizes that manufacturers and their supply chains generally pass the Rule 1111 mitigation fee along to consumers and often list the fee on the invoice as a separate line item. Most of the mobile homes are located in ~~disadvantaged~~ lower income communities, and increasing the mobile home furnace mitigation fee may impose a greater financial impact to these consumers.

Further, as various local and state agencies in California adopt zero-emission policies, manufacturers have been dedicating resources toward zero-emission heating equipment such as heat pumps. Mobile home furnaces, estimated to be four percent of all furnace sales in the South Coast AQMD, constitute a very small market for manufacturers to invest in any lower-NOx emission technology, other than their general plan for zero-emission technologies, and thus may not be profitable to develop.

Staff does not recommend a mitigation fee increase but will analyze the feasibility of requiring zero-emission technologies and provide incentives to encourage early adoption of those technologies in future rulemaking. Staff is in the process of developing a new incentive program for all-electric heat pumps for space or water heating, with a focus on ~~disadvantaged~~ lower income communities, including mobile homes. Staff has identified funding for the new program and will continue to explore more funding sources to incentivize more units.

Comment #PC-2: David Stephens on behalf of Johnson Controls asked if mobile home furnaces would be exempted from the zero-emission amendment similar to the Bay Area AQMD's zero-emission rule.

Response #PC-2: The South Coast AQMD is in extreme non-attainment for ozone; therefore, all feasible reductions must be pursued. Mobile home furnaces are currently regulated by Rule 1111 so allowing an exemption would result in backsliding of emissions, which the region cannot afford. Staff will include mobile home furnaces when conducting the technology assessment for the feasibility of a zero-emission standard during the upcoming rule amendment.

Comment #PC-3: David Stephens on behalf of Johnson Controls also asked if the upcoming zero-emission amendment would have a technology assessment.

Response #PC-3: Staff will conduct a technology assessment on the feasibility of a zero-emission limit following the passage of the current amendment, which will include a public process. During the public process, staff and stakeholders will discuss the technical feasibility of zero-emission technologies. If there are concerns about the technical feasibility of future zero-emission limits, staff may consider including a potential future technology assessment.

COMMENT LETTERS

Comment Letter #1

August 2, 2023

Ms. Yanrong Zhu
 Planning, Rule Development and Implementation
 South Coast Air Quality Management District
 21865 Copley Dr.
 Diamond Bar, CA 91765

Electronic submittal: Yanrong Zhu (yzhu1@aqmd.gov)

Re: Johnson Controls Comments to South Coast Air Quality District Proposed Amended Rule 1111 - Reduction of NOx Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces

Ms. Zhu:

Johnson Controls appreciates the opportunity to provide comments on South Coast Air Quality District (SCAQMD) Proposed Amended Rule 1111 - Reduction of NOx Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces.

Johnson Controls is a leading global provider of heating, ventilating and air conditioning equipment, building controls, security and fire/life safety solutions which includes brands such as York, Metasys, Simplex, Grinnell, Zettler and Tyco. The company has nearly 100,000 employees and over 1,000 locations globally and has long been a leader in sustainable and energy efficient technology. Johnson Controls first set sustainability goals in 2002, and the company has reduced its Scope 1 and 2 greenhouse gas absolute emissions by 42% in 2022 compared to a 2017 baseline year. Further, we are AAA rated by MSCI and are recognized as among the Top 100 Most Sustainable Companies by Corporate Knights, and number one in our industry segment.

JCI recognizes the value of SCAQMD's air quality management plan and the pursuit of NOx emissions reduction, including the goal of a 70 percent reduction for residential and commercial sources by 2037 as highlighted in SCAQMD's 2022 AQMP. The inclusion of manufactured housing (MH) as part of that goal is understandable but, as noted by South Coast staff in the July 19, 2023 public meeting, MH is a small portion (i.e., less than 4%) of the NOx emissions problem. Understandably, SCAQMD faces a true dilemma regarding balancing the positive benefits of emissions reduction with the negative economic impact to MH residents. When considering the income segment of the population most commonly residing in MH, those below the 100% poverty level, the impact of requiring conversion to ultralow NOx is disproportional to other populations.

1-1

JCI strongly encourages SCAQMD to adopt a path forward similar to that incorporated in Bay Area AQMD (BA) Rule 9-4 and exempt MH from the SCAQMD Rule 1111 ultralow NOx mandate. To do otherwise would have a negative impact on the 28% of California's population the Public Policy Institute of California identifies as poor, i.e., with a mean household income of only \$36,900¹ in a state with a mean household income of \$84,097².

Exemption of MH from Rule 1111 would seem to especially make sense when considering the parallel efforts by CARB, SCAQMD and BAAQMD to move to zero emissions technology requirements. While there are legal questions to be resolved, California will move forward in significantly reducing the use of natural gas fueled heating appliances. JCI supports these efforts³ but would encourage harmonization of these efforts by recognizing the

¹ Public Policy Institute of California Fact Sheet, <https://www.ppic.org/publication/poverty-in-california/>

² California State Water Board Drinking Water and Wastewater Programs, American Community Survey 5-Year Estimates to determine MHI. Data Effective April 1, 2023, https://www.waterboards.ca.gov/drinking_water/services/funding/documents/srf/mhi.pdf

³ JCI Public Comments, 2022 Scoping Plan Update – CARB Building Decarbonization Workshop

1-1

value in creating regulatory consistency of ultralow NOx rules across California and deferring district level negative impacts to those who most need the assistance.

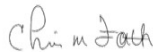
1-2

To be clear, JCI is not making a policy recommendation relative to the extension of natural gas use and the delaying of associated NOx emissions but emphasizing the need for a balance of reducing NOx emissions with consideration of the impact to a segment of the population least able to afford the ultralow NOx technology. We support SCAQMD's and the state of California's continuing efforts to address these issues in future revisions to Rule 1111 and other state and district rules. Rather, our recommendation is that for existing buildings, when the effective operational life of the gas infrastructure has been reached, electrification can occur. However, prior to that time, continued use of the natural gas infrastructure serving MH should be allowed to the extent that it can facilitate more impactful building emissions measures and minimize the negative impact to the lower cost heating option MH is intended to serve.

JCI is committed to the achievement of sustainable and healthful environment in SCAMQD, California and across the globe. We are eager to collaborate with SCAQMD and other stakeholders in California to pursue policies that maximize the benefits of space heating electrification and yield optimal, cost-effective, and equitable building outcomes.

Thank you again for the opportunity to comment on the SCAQMD Proposed Amended Rule 1111 - Reduction of NOx Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces. Please feel free to contact undersigned with any questions; JCI looks forward to our continued partnership with SCAQMD.

Respectfully,



Chris M Forth

Vice President
Regulatory, Codes & Environmental Affairs
Johnson Controls
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David Stephens, Ph.D., P.E., PEM

Director
Global Product Safety Compliance
Johnson Controls
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cc: Heather Farr, Planning and Rules Manager
Peter Campbell, Air Quality Specialist

Staff Response to Comment Letter #1

Response to Comment 1-1

Staff's response is provided in Response to PC-2.

Response to Comment 1-2

Staff acknowledges JCI's recommendation for existing buildings to not require zero-emission technologies until the end of the useful life of the natural gas infrastructure; however, Rule 1111 regulates NOx emissions of natural gas central furnaces. Staff's analysis will focus on the technical feasibility and cost-effectiveness of zero-emission furnaces. Regulation of natural gas infrastructure is outside the scope of the rule. Furthermore, any future proposed zero-emission requirement would be fuel neutral, and staff is open to any current or emerging natural gas-fueled zero-emission technologies. Staff will conduct further analyses on a potential zero-emission

amendment during a future rule development process, which will publicly commence following this rule amendment, and will continue to communicate with stakeholders during the public process.

Comment Letter #2

August 2, 2023

VIA EMAIL

Peter Campbell
Air Quality Specialist
Email: pcampbell@aqmd.gov

Emily Yen
Assistant Air Quality Specialist
Email: eyen@aqmd.gov

South Coast Air Quality Management District

Re: Comments on Proposed Amended Rule 1111- Reduction of NO_x Emissions from Natural Gas-fired, Fan-type Central Furnaces

Dear Mr. Campbell & Ms. Yen:

We respectfully submit these comments in response to the July 19, 2023 Public Consultation Meeting concerning Proposed Amended Rule 1111- Reduction of NO_x Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces. We appreciate this opportunity to provide comment on the proposed amendment to this rule, and we also take this opportunity to strongly urge staff to prioritize adoption of strong zero- NO_x appliance standards and put the 2022 Air Quality Management Plan (AQMP) into action.

Recognizing the region's extreme emissions reduction gap, the 2022 AQMP stated in no uncertain terms that the "only way to achieve the required NO_x reductions is through extensive use of zero-NO_x emission technologies across all stationary and mobile sources." For appliances in residential and commercial buildings, which account for 22.1 tons of NO_x emissions per day in the Air District,¹ reducing emissions through zero-NO_x-emission standards will be critical to the District's efforts to attain national ozone standards.

More than six months have passed since the Governing Board's adoption of the 2022 AQMP, and we are still a long way from adopting zero- NO_x standards for building appliances. A rule that moves a portion of the region's commercial ovens to zero-emissions technology by 2036 will be adopted this week, and only one other zero-emission measure – Rule 1146.2 – has begun a full public process.

Clean air advocates have been waiting expectantly for the Residential and Commercial Building Appliances Working Group to be rescheduled from its February 2023 date, and it is

¹ South Coast Air Quality Management District, Residential and Commercial Building Appliances Policy Brief, 2022 Air Quality Management Plan, p.2.

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South Coast Air Quality Management District
August 2, 2023
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unfortunate that this amendment to Rule 1111 simply serves to extend fossil fuel combustion in homes rather than moving to eliminate it. Prolonging the non-compliance fee for dirty fossil fuel furnaces in mobile homes, as the District is proposing in its amendment to Rule 1111, is a missed opportunity to start equitable zero-NO_x standards today. It also sends a strange signal where companies can wait until the absolute last moment of compliance, not develop a product, and then ask AQMD staff to scramble to get a rule amendment. This abuse of the process is a waste of time and distracts from other work that needs to be completed. It is also telling that manufacturers themselves are preparing for the inevitable transition to zero-NO_x equipment rather than expending resources to produce a limited low- NO_x distribution.²

2-2

We urge the District to commit to starting the zero- NO_x rulemaking process for appliances this year— with a first working group meeting this fall as has been promised. We need that commitment by the District to be official and mirrored in the rulemaking forecast. As of now, the Rule and Control Measure Forecast for the August 2023 Governing Board meeting continues to list Rules 1111, 1111.1, 1121, and 1121.1 as “TBD,” which connotes a lack of urgency and no plan to get these critical rules passed to protect air quality and health.

By pivoting to rulemaking for Zero- NO_x standards for all residences sooner, the District can still build in time to tackle the unique challenges of the affordable housing market, including mobile homes, address equity concerns, and motivate stronger market adoption of cleaner technology like heat pumps. Having a well-thought-out plan for addressing mobile homes and equity concerns is possible—but only if the District starts that rulemaking process today.

We stand ready to work with staff to ensure that rules are rigorous and reflect the needs of the residents of the air basin.

Sincerely,



Fernando Gaytan
Senior Attorney

Cc: Michael Krause, Email: MKrause@aqmd.gov; Heather Farr, Email: hfarr@aqmd.gov;
Yanrong Zhu, Email: yzhu1@aqmd.gov

² SCAQMD, [Public Consultation Meeting for Proposed Amended Rule 1111](#), July 19, 2023, slide 7.

Staff Response to Comment Letter #2**Staff Response to Comment 2-1**

Staff thanks the commenter for their letter and agrees that there is great urgency to adopt and implement feasible zero-emission standards for building appliances. Since the adoption of the 2022 AQMP, staff has been preparing for the rulemaking process to amend several rules for residential and commercial building appliances. The initial work plan was to hold a general umbrella Working Group Meeting in February 2023 to introduce the holistic vision of upcoming rulemakings to stakeholders, before conducting separate Working Group Meetings for each individual building appliance rule. Due to other considerations, staff adjusted the work plan and placed the focus on the Rule 1146.2 rule development. To date, staff has made progress on Proposed Amended Rule 1146.2 through the public process and is preparing to conduct the third Working Group Meeting this month. In addition, staff continued to gather information in preparation for initiating the rulemaking process to evaluate zero-emission standards for building appliances regulated by other rules, such as Rules 1111 and 1121. Staff has also been developing a rebate program to incentivize the early adoption of zero-emission building appliances.

The mobile home furnace 14 ng/J NO_x emission limit compliance date will start on October 1, 2023. None of the three manufacturers of mobile home furnaces have made progress on the development of compliant mobile home furnaces. Instead, manufacturers communicated that they are focusing on zero-emission technology development and expanding zero-emission options for residential and commercial building appliances according to the policy direction in California. Postponing the mobile home mitigation fee period end date will help ensure that mobile homeowners will have products for their homes, while staff continues to conduct analyses for the feasibility of zero-emission standards for residential and commercial building appliances, including mobile home space heating.

Staff Response to Comment 2-2

Staff has started the rule development process for zero-emission building appliances and is currently in the information gathering phase for Proposed Amended Rules 1111 and 1121 which includes: 1) gathering information on zero emission technologies, 2) attending ACEEE Hot Air and Water Forum, 3) attending training sessions hosted by Southern California Edison on zero-emission building appliances, 4) meetings with stakeholders representing the regulated industry, environmental groups, and other regulatory agencies, 5) determining the universe of units and estimated baseline emissions, 6) evaluating the incremental costs for zero-emission units versus combustion units, and 7) evaluating fuel switching costs for residential and commercial customers. Staff is committed to commencing the *public* rulemaking process for zero-emission standards for appliances regulated by Rules 1111 and 1121 within a month of the Governing Board considering this amendment for adoption. Stakeholders are encouraged to participate in the public process to help identify and address all related challenges, including those for mobile homes.

Staff recognizes mobile homes are located mostly in low income communities, which poses an equity issue. Staff is currently developing a potential new rebate program which would incentivize all-electric heat pumps for residential space and water heating. This new rebate program will

allocate a major portion of the funding for low income communities. Staff will continue to work with stakeholders to identify more ways to address equity concerns for mobile homes.

Comment Letter #3

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 Phone 703 524 8800 | Fax 703 562 1942
 www.ahrinet.org

August 2, 2023

Mr. Peter Campbell
 Ms. Emily Yen
 South Coast Air Quality Management District
 21865 Copley Drive
 Diamond Bar, CA 91765

(submitted electronically to pcampbell@aqmd.gov and eyen@aqmd.gov)

Re: AHRI Comments – Proposed Amended Rule 1111 – Reduction of NOx Emissions from Natural Gas-Fired, Fan-Type Central Furnaces – July 19, 2023 Public Consultation Meeting

Dear Mr. Campbell and Ms. Yen:

The Air-Conditioning, Heating, and Refrigeration Institute (AHRI) respectfully submits this letter in response to information presented at the July 19, 2023 Public Consultation Meeting by the South Coast Air Quality Management District (SCAQMD) regarding Proposed Amended Rule 1111 – Reduction of NOx Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces (PAR 1111).

AHRI is the trade association representing manufacturers of heating, cooling, water heating, commercial refrigeration equipment, and refrigerant producers. More than 300 members strong, AHRI is an internationally recognized advocate for the industry, and develops standards for and certifies the performance of many of the products manufactured by our members. In North America, the annual economic activity resulting from the HVACR industry is approximately \$256 billion. In the United States alone, our member companies, along with distributors, contractors, and technicians employ more than 1.3 million people. AHRI represents almost all North American manufacturers of residential furnaces.

During the July 19, 2023 public meeting, SCAQMD staff presented two topics: (1) the proposed extension of mitigation fees for mobile home furnaces from September 30, 2023, to September 30, 2025; and (2) next steps for the zero-emission amendment to Rule 1111.

SCAQMD’s Proposed Extension of the Mobile Home Mitigation Fee is Appropriate

Regarding the mobile home furnace proposal, AHRI fully supports SCAQMD staff’s analysis and the proposal to extend the mitigation fee option for mobile home furnaces from September 30, 2023, to September 30, 2025, in Rule 1111. Requiring mobile home furnaces to meet the 14 ng/J NOx emission limit by October 1, 2023, would be impossible as there are no

3-1

1

AHRI Comments – SCAQMD PAR 1111 July 19, 2023 Public Consultation Meeting
August 2, 2023

3-1

compliant products. As acknowledged by staff in the July 2023 PAR 1111 Preliminary Draft Staff Report, the mobile home market is quite small.

Considerations for the Zero-Emission Amendment Proposal

As outlined in the July 2023 PAR 1111 Preliminary Draft Staff Report, staff plans “to evaluate the feasibility of requiring zero-emission NOx technologies for residential and commercial buildings, including for mobile home heating units, and propose appropriate compliance dates to meet potentially lower emission standards.”¹ Herein, AHRI has early feedback to share regarding resources for identifying accurate product costs and concerns regarding emergency replacements. Lastly, the scope of the plan as outlined in the staff report may conflict with charging control measures adopted in the 2022 Air Quality Management Plan (AQMP).

3-2

Regarding the cost data for space and water heating heat pumps, the TECH Clean California webpage is an excellent resource which includes real cost data for over 10,000 installations.² The average project cost in California to replace bath space and water heating with heat pumps to be \$17,400 based on a total of 10,342 projects.³ The data set can be filtered to find minimum and maximum project cost for space and water heating heat pump installations within the boundary of the SCAQMD. AHRI encourages SCAQMD to use accurate cost data in developing the zero-emissions staff report.

SCAQMD should also consider providing a pathway for emergency replacements. In most cases, space and water heating equipment is replaced upon failure of the appliance. If this occurs and the house needs a panel upgrade or other alterations to accommodate a zero-NOx solution, that house could be without space- or water heating for several days if not weeks while the retrofits occur. If such an event were to happen during a cold snap, there could be significant concern for the health and safety of the occupant(s). SCAQMD needs to consider solutions to the emergency replacement issue, including proactive replacement programs, such that the impact of any zero-emission proposed rule does not compromise safe and reliable access to services.

Lastly, SCAQMD staff cites implementation of Control Measure R-CMB-02 for “the policy direction for Rule 1111 to align with California’s zero-emission pathway for residential and commercial buildings.” However, SCAQMD also states that the control measure R-CMB-02, “proposed the development of zero-emission NOx limits for residential space heating when *feasible*.”⁴ [*emphasis added*] AHRI urges SCAQMD staff to clarify the directive to develop of zero-emission NOx limits for commercial space heating and for both residential and commercial water heating. AHRI also notes that feasibility of proposed limitations should be clearly addressed in the draft staff report expected to accompany the proposed zero-emission amendment. Feasibility should explicitly address first cost of zero-emission equipment installations (i.e. costs associated with fuel switching such as electric panels, rewiring, ductwork, etc..) and the complexities created by emergency replacements.

¹ July 2023 PAR 1111 Preliminary Draft Staff Report (Page Exe-1)

² <https://techcleanca.com/public-data/maps-and-graphs/>

³ *Id.*

⁴ July 2023 PAR 1111 Preliminary Draft Staff Report (Page Exe-1)

AHRI Comments – SCAQMD PAR 1111 July 19, 2023 Public Consultation Meeting
August 2, 2023

3-2

AHRI appreciates the opportunity to provide these comments. If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,



Laura Petrillo-Groh, PE
Senior Director, Regulatory Affairs
Direct: (703) 600-0335
Email: LPetrillo-Groh@ahrinet.org

Staff Response to Comment Letter # 3

Staff Response to Comment 3-1

Staff appreciates AHRI's participation in this rulemaking process and comments.

Staff Response to Comment 3-2

Staff appreciates the comment and is aware of the TECH Clean California database on heat pump installations as a resource for cost information. Staff intends to continue referencing data from TECH Clean California and other sources for the development of the potential future Rule 1111 zero-emission amendment, especially for the feasibility analysis.

Regarding emergency replacement, staff is aware that most furnace replacements occur due to the failure of the original unit. Proactive replacement of older units may be necessary in many cases for the safety and comfort of the occupants. Future implementation dates for zero-emission requirements would enable the supply chain to be prepared for future market demand. In addition, some manufacturers are developing 120-volt units and other replacement options to address emergency replacement in the future. Staff is in the process of developing a new rebate program designed to incentivize zero-emission appliances, which will help mitigate this issue. As the rule development process progresses, staff welcomes other suggestions regarding emergency replacements.

Regarding the feasibility of zero-emission requirements, staff will conduct an in-depth analysis of feasibility including a thorough study of cost, product availability, building stock, appliance profile, etc. Staff is committed to making the effort to develop the rule amendments through a rigorous public process before bringing any proposed zero-emission rule for the Governing Board's consideration.

ATTACHMENT H



**South Coast
Air Quality Management District**

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

SUBJECT: NOTICE OF EXEMPTION FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

PROJECT TITLE: PROPOSED AMENDED RULE 1111 – REDUCTION OF NO_x EMISSIONS FROM NATURAL-GAS-FIRED, FAN-TYPE CENTRAL FURNACES

Pursuant to the California Environmental Quality Act (CEQA) Guidelines, the South Coast Air Quality Management District (South Coast AQMD), as Lead Agency, has prepared a Notice of Exemption pursuant to CEQA Guidelines Section 15062 – Notice of Exemption for the project identified above.

If the proposed project is approved, the Notice of Exemption will be filed for posting with the county clerks of Los Angeles, Orange, Riverside, and San Bernardino Counties. The Notice of Exemption will also be electronically filed with the State Clearinghouse of the Governor’s Office of Planning and Research for posting on their CEQAnet Web Portal which may be accessed via the following weblink: <https://ceqanet.opr.ca.gov/search/recent>. In addition, the Notice of Exemption will be electronically posted on the South Coast AQMD’s webpage which can be accessed via the following weblink: <http://www.aqmd.gov/nav/about/public-notices/ceqa-notices/notices-of-exemption/noe---year-2023>.

**NOTICE OF EXEMPTION FROM THE
CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)**

To: County Clerks for the Counties of Los Angeles, Orange, Riverside, and San Bernardino; and Governor's Office of Planning and Research – State Clearinghouse	From: South Coast Air Quality Management District 21865 Copley Drive Diamond Bar, CA 91765
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Project Title: Proposed Amended Rule 1111 – Reduction of NOx Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces

Project Location: The proposed project is located within the South Coast Air Quality Management District's (South Coast AQMD) jurisdiction, which includes the four-county South Coast Air Basin (all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties), and the Riverside County portion of the Salton Sea Air Basin and the non-Palo Verde, Riverside County portion of the Mojave Desert Air Basin.

Description of Nature, Purpose, and Beneficiaries of Project: Rule 1111 is designed to reduce emissions of nitrogen oxides (NOx) from residential and commercial gas-fired fan-type space heating furnaces and includes an alternate compliance option that allows the manufacturer to pay a per-unit mitigation fee, in lieu of meeting the lower NOx emission limit, for up to 36 months after the applicable compliance date. Proposed Amended Rule 1111 (PAR 1111) extends the end date of the mitigation fee alternate compliance option for mobile home furnaces from September 30, 2023 to September 30, 2025, and allows manufacturers of mobile home furnaces to comply by paying the mitigation fee for 40 nanogram per Joule (ng/J) NOx units with recordkeeping and reporting requirements for two more years. The proposed project does not change the requirements for the mitigation fee or the recordkeeping and reporting requirements. The extension will benefit mobile home manufacturers by providing more time to develop cleaner technologies for mobile home space heating purposes so that mobile homeowners will have mobile home furnaces which are commercially available and compliant for future installations. A delay in achieving approximately 0.016 ton per day (equivalent to 32 pounds per day) of NOx emission reductions will be expected to occur as a result of the extended compliance date for mobile home furnaces. The South Coast AQMD will continue to evaluate the feasibility of zero-emission technologies for future rule amendments to Rule 1111 which may be able to achieve additional NOx emission reductions over the long-term.

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 Section 15061(b)(3) – Common Sense Exemption


Reasons why project is exempt: South Coast AQMD, as Lead Agency, has reviewed the proposed project (PAR 1111) pursuant to: 1) CEQA Guidelines Section 15002(k) – General Concepts, the three-step process for deciding which document to prepare for a project subject to CEQA; and 2) CEQA Guidelines Section 15061 – Review for Exemption, procedures for determining if a project is exempt from CEQA. Since the quantity of delayed NOx emission reductions are expected to be temporary and less than the South Coast AQMD air quality significance threshold for NOx, it can be seen with certainty that implementing the proposed project would not cause a significant adverse effect on the environment. Therefore, the proposed project is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3) – Common Sense Exemption.

Date When Project Will Be Considered for Approval (subject to change):
South Coast AQMD Governing Board Public Hearing: September 1, 2023

CEQA Contact Person: Sina Taghvaei, Ph.D.	Phone Number: (909) 396-2192	Email: staghvaei@aqmd.gov	Fax: (909) 396-3982
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PAR 1111 Contact Person: Peter Campbell	Phone Number: (909) 396-3185	Email: pcampbell@aqmd.gov	Fax: (909) 396-3982
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Date Received for Filing: _____ **Signature:** _____ *(Signed and Dated Upon Board Approval)*
Kevin Ni
Acting Program Supervisor, CEQA
Planning, Rule Development, and Implementation



PROPOSED AMENDED RULE 1111 – REDUCTION OF NOX EMISSIONS FROM NATURAL GAS-FIRED, FAN-TYPE CENTRAL FURNACES

BOARD MEETING

SEPTEMBER 1, 2023

ATTACHMENT I

RULE 1111 BACKGROUND

- ❑ Adopted in December 1978 and established a NOx limit of 40 ng/J
- ❑ Applies to manufacturers, distributors, sellers, and installers of residential and commercial natural gas furnaces
- ❑ NOx limit lowered to 14 ng/J in November 2009 with future compliance dates
 - Mitigation fee alternative compliance option allowed for a limited period
- ❑ Mobile home furnace mitigation fee alternate compliance option ends on September 30, 2023
 - ❑ Subject to 14 ng/J NOx limit thereafter

Category	Final Compliance Date (14 ng/J NOx)
Condensing/ Non- Condensing*	September 30, 2019
Weatherized	September 30, 2021
Mobile Home	September 30, 2023

* Compliance date for high altitude installations extended to March 31, 2022

CURRENT STATUS

- ❑ No manufacturers have developed, or plan to develop, 14 ng/J furnaces for mobile homes
 - Manufacturers cite design challenges, payback for development, and other regulatory requirements
 - Cannot replace without significant retrofits or cost increases

STAFF PROPOSAL – RULE LANGUAGE

Staff proposes to extend mitigation fee end date for mobile homes by two years for all size ranges

- Manufacturers will continue to pay mitigation fees per unit sold
- Mitigation fee option extended to September 30, 2025

Staff is developing a zero-emission requirement for space heating

- 2022 AQMP targeted a 2029 effective date for zero-emission space heating
- Separate rule amendment effort for Rule 1111 has already been initiated

KEY ISSUES

Environmental groups requested the mitigation fee be increased to incentivize manufacturers to develop compliant models

- Manufacturers and supply chain generally pass mitigation fee on to consumers
- Most mobile homes are in low income communities, so increased mitigation fees will impose a greater financial impact to these consumers
- Staff is developing a new rebate program which will incentivize all electric heat pumps for residential space heating

STAFF RECOMMENDATIONS

Adopt Resolution:

- Determining that PAR 1111 is exempt from the requirements of the California Environmental Quality Act; and
- Amending Rule 1111

BOARD MEETING DATE: September 1, 2023

AGENDA NO. 36

PROPOSAL : Execute Contract for Independent Audit Services for FYs Ending June 30, 2023, 2024, and 2025

SYNOPSIS: On November 4, 2022, the Board approved release of an RFP for independent financial audit services. Four qualified proposals were submitted and reviewed by the Administrative Committee at its March 10, 2023 meeting. Although the Board initially selected The Pun Group, LLP, it is now necessary to select another firm due to their resignation and to complete the audit ahead of the fast-approaching deadlines. This action is to execute a contract with the second ranked firm, Lance, Soll & Lunghard, LLP .

COMMITTEE: No Committee Review

RECOMMENDED ACTION:

Authorize the Chair to execute a contract with Lance, Soll & Lunghard, LLP for performance of the South Coast AQMD’s Financial Audits for FYs ending June 30, 2023, 2024, and 2025 in an amount not to exceed \$175,470.

Wayne Nastri
Executive Officer

SJ:gp

Background

A financial audit is performed annually on South Coast AQMD in compliance with the California Government Code and audit requirements for federal awards under the Uniform Guidance.¹ This audit is performed by independent Certified Public Accountants, and their reports are addressed to the Board. The Board approved release of an RFP for independent financial services. At the April 2023 Board meeting the Board authorized the Chair to enter into a three year contract with The Pun Group, LLP for audit services.

¹ Office of Management and Budget – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards at 2 CFR 200, is referred to as the Uniform Guidance.

Although the Board initially selected The Pun Group, LLP it is now necessary to select another firm due to their resignation and to complete the audit. The other three firms in order of ranking are Lance, Soll & Lunghard, LLP , Badawi & Associates, and Simpson and Simpson, LLP. This is particularly necessary in light of fast-approaching audit-related deadlines. Given concerns regarding timing and compliance with applicable laws, it is recommended that one of the remaining qualified candidates be chosen for completion of this work.

Resource Impacts

The maximum audit costs, including out-of-pocket expenses, are \$55,660, \$58,444, and \$61,366 for FYs ending June 30, 2023, 2024, and 2025, respectively. Funding is available in the FY 2023-24 Budget and will be requested in subsequent fiscal years through the annual budget process.