# Chapter 5d:

General Industrial Facilities

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### **Community Concerns**

During the Community Steering Committee (CSC) meetings, the co-leads helped lead discussions to identify air quality concerns and actions for the Community Emissions Reduction Plan (CERP). The South Los Angeles (SLA) community expressed concerns about emissions from and exposure to various stationary sources that are categorized as general industrial facilities, such as pallet manufacturers, chemical manufacturing, dry cleaners, gas stations, tire manufactures, and decommissioned facilities (**Figure 5d-1**). The community also raised concerns related to potential California Environmental Quality Act (CEQA) exemptions at construction sites, such as construction of housing projects. The CSC highlighted specific locations of unknown types of industrial facilities that were of concern to them within SLA.

Figure 5d-1: SLA Air Quality Concerns from Industrial Facilities



CSC members have identified dry cleaners as a category of concern due to the adverse health effects associated with solvents used in this process. One CSC-identified concern with dry cleaners is the use of perchloroethylene (PERC), a carcinogen, as a solvent, which was a common solvent used for dry cleaning. South Coast AQMD Rule 1421 phased out PERC from use at dry cleaners. Additionally, the CSC is concerned with the use of Rule 1102 non-PERC solvent dry cleaning systems.

### Regulatory Background

Based on the South Coast AQMD permitting database, there are approximately 354 general industrial facilities located within the SLA community boundary. South Coast AQMD utilizes multiple methods to classify facility types including the North American Industrial Classification Codes (NAICS), a key data source for information in this CERP. South Coast AQMD inspection teams use a broader category, Technical Specialty Code (TS-Code), to categorize a facility, which does not detail industry type. Please refer to Appendix 4: Enforcement Overview and History for information on which inspection team conducts the inspection for each facility, which is directly tied to the TS-Code. These general industrial facilities conduct a variety of processes and include facility types such as chemical operations, dry cleaners, manufacturing operations, utility, and gas stations. South Coast AQMD's Facility INformation Detail (F.I.N.D.) tool allows users to search for these permitted facilities by their facility ID number, name, address, permit number, application number, or Notice to Comply or Notice of Violation number. The F.I.N.D. tool provides detailed information for each facility, including equipment lists, emissions data for facilities subject to South Coast AQMD's or CARB's reporting rules, and compliance history. These facilities may be subject to South Coast AQMD rules that address odors, fugitive dust, and other emissions from facilities such as Rule 402, 403, 51137, 6 and 1147.

South Coast AQMD regularly inspects and enforces requirements at general industrial facilities. These are initiated by South Coast AQMD through routine facility inspections or prompted by outside parties through complaints, facility notifications, or agency referrals. Air pollution complaints received from the community are an important source of information. Complaints can be submitted

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<sup>&</sup>lt;sup>1</sup> South Coast AQMD, Governing Board Meeting December 6, 2002, Agenda Item 37, <a href="http://www3.aqmd.gov/hb/2002/December/0212ag.html">http://www3.aqmd.gov/hb/2002/December/0212ag.html</a>

<sup>&</sup>lt;sup>2</sup> TS-Code refers to the internal code South Coast AQMD inspectors use to determine the appropriate inspection team. Please refer to Appendix 4 for more information on South Coast AQMD inspection teams.

<sup>&</sup>lt;sup>3</sup> South Coast AQMD, Facility INformation Detail (F.I.N.D.), <a href="http://www.aqmd.gov/nav/FIND">http://www.aqmd.gov/nav/FIND</a>

<sup>&</sup>lt;sup>4</sup> South Coast AQMD, Rule 402 – Nuisance, <a href="http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf">http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf</a>

<sup>&</sup>lt;sup>5</sup> South Coast AQMD, Rule 403 – Fugitive Dust, <a href="http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf">http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf</a>

<sup>&</sup>lt;sup>6</sup> South Coast AQMD, Rule 1137 – PM10 Emission Reductions from Woodworking Operations, <a href="http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1137.pdf">http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1137.pdf</a>

<sup>&</sup>lt;sup>7</sup> South Coast AQMD, Rule 1147 – NOx Reductions from Miscellaneous Sources, <a href="http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1147.pdf">http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1147.pdf</a>

anonymously by phone or online, but contact information is crucial to ensure that inspectors can gather all the necessary information to conduct effective investigations.

As of January 1, 2021, Rule 1421<sup>8,9</sup> required all dry cleaning equipment utilizing PERC within the jurisdictional boundary of South Coast AQMD to be removed from service and facility owners switched to new dry cleaning systems using other compliant solvents (Rule 1102<sup>10</sup>) or water-based systems. CARB and South Coast AQMD conducted training to assist in the implementation of the statewide phase out of PERC. Additionally, South Coast AQMD established a financial incentive grant program which ended January 1, 2021, totaling \$4.2 million, which assisted dry cleaners to make an early transition to non-PERC alternative cleaning technologies.<sup>11</sup> For additional details regarding regulatory efforts for general industrial facilities and a map of facilities that received funding from the dry cleaning grant, please refer to Appendix 5d: General Industrial Facilities.

#### Actions to Reduce Emissions or Exposure

In the process of developing this CERP, members of the CSC requested identification of all the general industrial facilities that exist in the community, with a focus on specific locations to help address emission and exposure reduction efforts. CSC members requested information regarding the type of the facilities, activities conducted, compliance history, and the emissions resulting from operations at general industrial facilities in this community. Additionally, there were requests for training and education on South Coast AQMD's F.I.N.D. tool and the process for filing air quality complaints to increase the community's involvement in addressing air quality concerns. The CSC also stressed the importance of outreach and training to dry cleaners regarding community-identified alternatives and any financial and technical support to aid in the transition to these technologies.

In addition to dry cleaners, the CSC requested that information, outreach, and training be provided to assist them in increasing the community's involvement in addressing air quality concerns related to land-use issues. The CSC requested the following goals for general industrial facilities in SLA.

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<sup>&</sup>lt;sup>8</sup> South Coast AQMD, Rule 1421 – Control of Perchloroethylene Emissions from Dry Cleaning Systems, <a href="https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1421.pdf">https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1421.pdf</a>

<sup>&</sup>lt;sup>9</sup> South Coast AQMD, Notice to Owner/Operator of Perchloroethylene (PERC) Dry Cleaning Equipment, <a href="http://www.aqmd.gov/docs/default-source/compliance/industrial-advisories/notice-to-existing-perc-dry-cleaners-(dec-18-2020).pdf">http://www.aqmd.gov/docs/default-source/compliance/industrial-advisories/notice-to-existing-perc-dry-cleaners-(dec-18-2020).pdf</a>

<sup>&</sup>lt;sup>10</sup> South Coast AQMD, Rule 1102 – Dry Cleaners Using Solvents Other Than PERC, <a href="http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1102-dry-cleaners-using-solvent-other-than-perchloreothylene.pdf">http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1102-dry-cleaners-using-solvent-other-than-perchloreothylene.pdf</a>

<sup>&</sup>lt;sup>11</sup> South Coast AQMD, Financial Incentive Grant Program, http://www.aqmd.gov/home/programs/business/business-detail?title=dry-cleaner-grant

- A. Inform the community of applicable rules and regulations, compliance history, best management practices, "Good Neighbor" practices, and available data as they relate to general industrial facilities so they may prioritize facilities of concern.
- B. Identify emissions and exposure reduction measures to address prioritized concerns identified by Goal/Action A and conduct outreach to permit applicants.
- C. Enforce Rules 1102 and 1421, rule amendment to Rule 1102 for requirements for new dry cleaning machines, seek funding to support transition to community-identified zero-emission alternatives, and conduct community outreach to owners or operators regarding these alternatives.
- D. Collaborate with appropriate agencies when issues are identified at general industrial facilities during inspection sweeps to ensure these facilities follow rules and regulations from appropriate agencies, in particular those related to hazardous waste handling and disposal, soil and water contamination, and land-use issues.
- E. Inform the community about the F.I.N.D. tool and how to file air quality complaints.
- F. Conduct air measurement surveys in priority areas to identify facilities with potential elevated emissions and to characterize these emissions.
- G. Reduce emissions at construction sites.

The CSC developed the following CERP actions to address community concerns regarding the seven CERP goals. **Table 5d-1** summarizes goals, actions, metrics, and provides a timeline to achieve emissions or exposure reductions from general industrial facilities in SLA.

Table 5d-1: Actions to Reduce Emissions from and Exposure to General Industrial Facilities

Goal	Actions	Responsible Entity(ies)	Metric(s)	Timeline	
				Start	Complete
A: Identify Facilities of Concern	<ul> <li>Work with the CSC to identify and prioritize general industrial facilities of concern</li> <li>Inform CSC of applicable South Coast AQMD rules for the CSC-identified facilities</li> <li>Inform CSC of three (3) year compliance history of the CSC-identified facilities</li> </ul>	South Coast AQMD CSC	<ul> <li>Provide general industrial facility prioritization list</li> <li>Provide applicable rules list for identified facilities</li> <li>Provide compliance history for identified facilities</li> </ul>	2023	2023

Goal	Actions	Responsible Entity(ies)	Metric(s)	Timeline	
	Actions			Start	Complete
	<ul> <li>Collaborate with CSC to improve outreach to small businesses to encourage incorporation of best management and "Good Neighbor" practices</li> <li>Summarize available emissions and/or air pollution data collected at or near CSC-identified facilities</li> </ul>		<ul> <li>Number of outreach materials distributed to small businesses</li> <li>Provide emissions data, if applicable, for identified facilities</li> </ul>		
B: Identify Strategies	<ul> <li>Based on findings from Goal A, identify emissions and exposure reduction measures, if appropriate (e.g., identifying incentive opportunities, collaborating with appropriate agencies)</li> <li>During permit application process, provide education information to the permit applicants of cleaner alternative technologies (e.g., commercially available zeroemissions technology, non-toxic alternatives)</li> </ul>	South Coast AQMD	<ul> <li>Number of emissions and exposure reduction measures</li> <li>Number of equipment categories where education information is developed</li> </ul>	2023	2 <sup>nd</sup> quarter, 2027

Goal	Actions	Responsible Entity(ies)	Metric(s)	Timeline	
				Start	Complete
C: Dry Cleaners	<ul> <li>Enforcement of existing South Coast AQMD and CARB regulations (e.g., South Coast AQMD Rule 1102, South Coast AQMD Rule 1421, CARB Airborne Toxic Control Measure (ATCM) for Emissions of Perchloroethylene (PERC) from Dry Cleaning Operations (Dry Cleaning ATCM))</li> <li>Initiate process to amend Rule 1102 to consider new standard reflecting zero-emissions technologies for new dry cleaning systems</li> <li>Identify incentive opportunities to transition to community-identified alternatives (e.g., professional wet cleaning, other zero-emission technologies)</li> <li>Community outreach to owners or operators regarding alternatives, incentive opportunities, and seeking feedback from owners or operators regarding their willingness to transition to and/or need of support to transition to community-identified alternatives</li> </ul>	South Coast AQMD CSC	<ul> <li>Number of Rule 1102 and Rule 1421 inspections</li> <li>Number of Rule Working Group meetings held</li> <li>Update to CSC on rule development efforts</li> <li>Provide list of incentive opportunities to support transition to community-identified alternatives, if incentive opportunities are identified</li> <li>Number of outreach materials distributed to owners or operators</li> <li>Number of owners or operators that provide feedback, if owners or operators are willing to disclose</li> </ul>	2023	2 <sup>nd</sup> quarter, 2027

Goal	Actions	Responsible	Metric(s)	Timeline	
Goal	Actions	Entity(ies)	ivietric(s)	Start	Complete
D: Agency Referrals	Collaborate with appropriate agencies by reporting issues that fall outside of South Coast AQMD's jurisdiction during inspection sweeps at general industrial facilities (e.g., Local land-use agencies, California Division of Occupational Safety and Health (Cal/OSHA), Certified Unified Program Agencies (CUPA), public health departments)	South Coast AQMD CARB	Number of updates regarding referrals or follow-up information presented by the appropriate agency(ies) to the CSC	2 <sup>nd</sup> quarter, 2022	2 <sup>nd</sup> quarter, 2027
E: F.I.N.D. Tool and Filing Complaints	Conduct community outreach on F.I.N.D. tool including training on how to use the F.I.N.D. tool to search for information about South Coast AQMD-regulated facilities (e.g., facility details, equipment, permits, compliance history, etc.) and on filing air quality complaints by phone, web, or mobile application to the community	South Coast AQMD	<ul> <li>Conduct one F.I.N.D. outreach session to the community</li> <li>Conduct one outreach session to inform the community how to file an air quality complaint</li> <li>Create user-friendly training materials for F.I.N.D. to be published on the South Coast AQMD website</li> </ul>	4 <sup>th</sup> quarter, 2022	2 <sup>nd</sup> quarter, 2027
F: Air Measurements Survey	Conduct initial air measurements surveys near facilities of concern (as identified under action A) to identify	South Coast AQMD	<ul> <li>Number of air measurements surveys</li> <li>Number of updates to the CSC</li> </ul>	2nd quarter, 2022	2nd quarter, 2027

Goal	Actions	Responsible Entity(ies)	Metric(s)	Timeline	
				Start	Complete
	and characterize any potential emissions				
G: Construction Sites Enforcement	Focused enforcement at construction sites of concern, as identified by the CSC, to evaluate compliance with South Coast AQMD rules (e.g., Rule 403 and Proposed 403.2 <sup>12</sup> regulating fugitive dust)	South Coast AQMD CSC	Number of enforcement updates to the CSC	4th quarter, 2022	2nd quarter, 2027

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<sup>&</sup>lt;sup>12</sup> South Coast AQMD, Proposed Rule 403.2 – Fugitive Dust from Large Roadway Projects, <a href="http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-403-2">http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-403-2</a>