

June 16, 2021

Comment letter submitted via email

Ms. Susan Nakamura, Assistant Deputy Executive Officer  
Planning, Rule Development and Area Sources  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

E-mail: [SNakamura@aqmd.gov](mailto:SNakamura@aqmd.gov)

**RE: ACWA Support of Proposed Amendment to Rule 1470 and Proposed New Rule 118.1**

Dear Ms. Nakamura:

The Association of California Water Agencies (ACWA) is writing to express support for the proposed amendment to Rule 1470 and proposed new Rule 118.1 (Proposed Rules) as presented during Working Group Meeting (WGM) No. 3 held on May 27, 2021. ACWA represents 460 public water agencies that are responsible for 90 percent of the water supply deliveries throughout the state for domestic, agricultural, and industrial uses. Water and wastewater agencies are reliant on backup generators to maintain the delivery and treatment of water during public safety power shutoff (PSPS) and emergency events. The increasing number and duration of PSPS and emergency events that result in loss of power from the electrical grid continues to be a major challenge for water and wastewater critical service facilities.

The Proposed Rules, as presented and discussed, would provide flexibility to water and wastewater agencies to maintain essential public health and safety services during a PSPS or emergency event, while ensuring the protection of the South Coast Air Quality Management District (SCAQMD) region's air resources. ACWA appreciates SCAQMD's attention to this issue and the open stakeholder process throughout the working group meetings to facilitate conversation and improve the Proposed Rules. Further, we appreciate the inclusion of issues raised by ACWA member agencies to ensure that the Proposed Rules provide water and wastewater agencies operational flexibility.

***Proposed Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines***

The Proposed Rule 1470 amendment would increase flexibility for waste and wastewater agencies to maintain and test generators, and is critical for ensuring the reliability of emergency backup generators for PSPS events and other emergencies. Specifically, Proposed Rule 1470 would allow up to 60 hours of runtime over a three-year period with no more than 30 hours in any single year for generators that are currently limited to no more than 20 hours per year of runtime.

This proposed amendment would not increase particulate matter over a three-year period or create any greater health risk as the maximum average runtime would still equate to the current 20 hours annually. Additionally, ACWA notes that this amendment is narrowly focused in scope and would only apply to generators within or serving a Very High Fire Hazard Severity Zone and supporting water or wastewater operations.

***Proposed Rule 118.1 – Public Safety Provisions for Stationary Emergency Standby Engines***

Proposed Rule 118.1 would allow operators of emergency standby engines located at critical service facilities to exceed the current 200-hour annual limitation if the exceedance is due to a PSPS event, provided timely notification is provided and records are maintained. The one-time notification and annual recordkeeping requirements for an exceedance would provide a reasonable requirement to ensure that the SCAQMD is aware of these events, while maintaining an enforcement mechanism. Also, the addition of up to three hours for each PSPS imminent shutoff notice will support the smooth transition of power before and after each event.

As discussed during the stakeholder comment session at the work group meeting, we agree that SCAQMD should clarify that “critical service facilities” include wastewater collection systems (i.e. lift stations) and water treatment facilities. These facilities are not specifically mentioned in the definition of essential public service under Rule 1302 or otherwise listed by SCAQMD based on prior stakeholder input.

We appreciate the support of the SCAQMD in developing the Proposed Rules and obtaining concurrence from the California Air Resources Board on Proposed Rule 1470. We look forward to a continued conversation on this important rulemaking. Please do not hesitate to contact me at [nickb@acwa.com](mailto:nickb@acwa.com) or (916) 441-4545 if you have any further questions.

Sincerely,



Nicholas Blair  
Regulatory Advocate

cc:

Ms. Tiffani To, SCAQMD - [TTo@aqmd.gov](mailto:TTo@aqmd.gov)

Mr. Michael Laybourn, SCAQMD - [MLaybourn@aqmd.gov](mailto:MLaybourn@aqmd.gov)

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Mr. Dave Eggerton, Executive Director, Association of California Water Agencies

Ms. Cindy Tuck, Deputy Executive Director for Government Relations,  
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