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June 21, 2021

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

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

Dear Ms. Nakamura:

On behalf of Valencia Heights Water Company, I am writing to express support for the proposed amendment to Rule 1470 and proposed new Rule 118.1 as presented during Working Group Meeting (WGM) No. 3 held on May 27, 2021. The proposal provides additional flexibility for the essential operation, maintenance and testing of emergency backup generators, while ensuring the protection of the region's air resources.

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

The proposed amendment would provide much needed flexibility for the maintenance and testing of generators that are currently limited to no more than 20 hours per year of runtime for these purposes. The amended rule would allow up to 60 hours of runtime over a three-year period with no more than 30 hours in any single year. The proposed amendment would not result in the generation of more 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. The amendment is very narrow in scope as it would only apply to engines within or serving a Very High Fire Hazard Severity Zone and supporting water or wastewater operations. The change would allow more rigorous maintenance and testing to be performed every two to three years without undue concern for exceeding the current 20-hour limitation. The rule change is critical to ensure the reliability of emergency backup generators when needed to respond to emergencies or PSPS events.

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

The new rule 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 Public Safety Power Shutoff (PSPS) event. The increasing number and duration of PSPS events and other emergencies that result in loss of power from the electrical grid continues to be a major concern for operators of critical service facilities as defined in the proposed rule. The provisions would allow an owner or operator of an emergency standby engine at a critical service facility to be exempt from counting operating hours of a qualifying event towards the 200-hour calendar year limitation specified in Rule 1110.2 provided timely notification is provided and records are maintained. The one-time notification and annual recordkeeping requirements for an exceedance represent a reasonable compliance burden to ensure the agency is aware of these events while maintaining a mechanism to enforce the provisions of the rule. Also, the addition of up to 3-hours for each PSPS imminent shutoff notice will support the smooth transition of power before and after each event. As discussed during the WGM, we request the SCAQMD clarify that critical service facilities include wastewater collection systems (i.e. lift stations) and water treatment facilities, which are not specifically described 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 you and your staff to develop the proposed rule changes and to obtain concurrence from the California Air Resources Board on the proposed amendment for Rule 1470. Please do not hesitate to contact me at 626-332-8935 or dmichalko@vhwc.org if you have any questions about our comments. Thank you.

Sincerely,



P. David Michalko
General Manager

cc:

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