

Proposed Rule 1480 – Ambient Monitoring and Sampling of Metal Toxic Air Contaminants

WORKING GROUP MEETING #9

October 8, 2019

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Status Update on PR 1480

- Updated title to “Ambient Monitoring and Sampling of Metal Toxic Air Contaminants”
- September 20, 2019 – Preliminary Draft Rule (3rd revision of PR 1480) and Preliminary Draft Staff Report
- October 2, 2019 – Public Workshop
- Preliminary Draft Rule restructured proposed rule with minimal content changes - approach and intent of PR 1480 remained the same
- Working Group #9 will discuss the rule language changes and address comments raised at Public Workshop

Changes to Proposed Rule Language

Overview of Types of Revisions

Changes Between August and September

- Revisions to August 27th version of PR 1480 that were incorporated in September 20th version of PR 1480 (generally in blue tables)

Proposed Revisions After September

- Proposed changes since the September 20th version of PR 1480 (generally in green tables)

Stakeholder Comments – No Proposed Revisions

- Discussion of stakeholder comment and decision for no proposed revision

Overview of Modifications August and September Versions of PR 1480

- Reorganized provisions for clarity
- Revisions to address stakeholder concerns
- Provided clarity on Monitoring and Sampling requirements and elements in a Monitoring and Sampling Plan
- Streamlined definitions
- Global changes:
 - Changed “Potentially Significant Facility” to “Metal TAC Monitoring Facility”
 - Changed “Metal TAC Monitoring” to “Monitoring and Sampling”
 - Used terms “Basic, Alternative, and Reduced” Monitoring and Sampling Plans for clarity to distinguish between various types of Monitoring and Sampling Plans

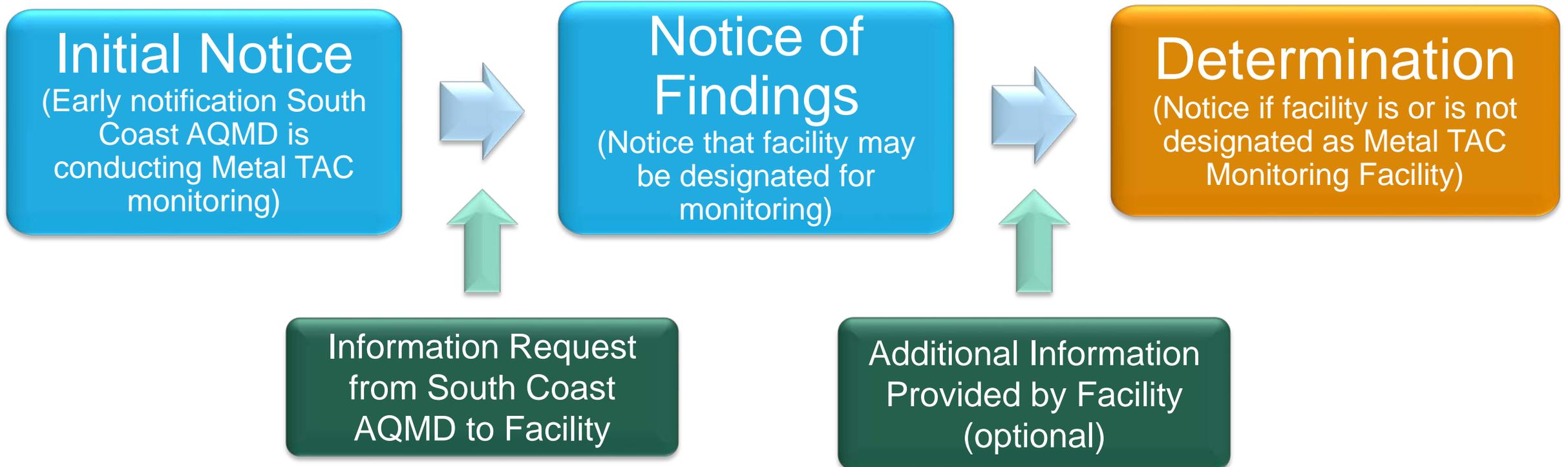
Overview of Subdivisions

August 27, 2019 Rule Language	September 20, 2019 Rule Language
(a) Purpose	(a) Purpose
(b) Applicability	(b) Applicability
(c) Definitions	(c) Definitions
(d) Designation of a <i>Potentially Significant Facility</i>	(d) Designation of a <i>Metal TAC Monitoring Facility</i>
(e) Monitoring and Sampling Plan	(e) Monitoring and Sampling Plans
(f) <i>Metal TAC Monitoring</i> Requirements	(f) <i>Monitoring and Sampling</i> Requirements
(g) Alternative Monitoring and Sampling	(g) Alternative Monitoring and Sampling
(h) Reduced Monitoring and Sampling Frequency	(h) Reduced Monitoring and Sampling Frequency <i>and/or Monitors</i>
(i) Monitoring, Recordkeeping, and Reporting Requirements	(i) Monitoring, Recordkeeping, and Reporting Requirements
(j) Request to Discontinue <i>Metal TAC Monitoring</i>	(j) Request to Discontinue <i>Monitoring and Sampling</i>
(k) Exemptions	(k) Exemptions

Definitions – (c)

August Version	September Version	Purpose
None	BENCHMARK CONCENTRATION	Added to improve clarity – Benchmark Concentration is the average concentration of the 30 days prior to submittal of Reduced Monitoring and Sampling Plan
INITIAL NOTICE	None	Removed as definition is in paragraph (d)(1)
METAL TAC MONITORING	MONITORING AND SAMPLING	Renamed for clarity
POTENTIALLY SIGNIFICANT FACILITY	METAL TAC MONITORING FACILITY	Renamed for clarity
SAMPLE EXTRACT	None	Removed as definition is in paragraph (f)(6)
VALID SAMPLE	VALID SAMPLE	Modified definition to require the sample must be collected pursuant all parameters specified in a Monitoring and Sampling Plan, not just sampling period

General Process for Designation



Overview of Designation Process (d) Between August and September Versions of PR 1480

- Revised reason for Initial Notice (d)(1)
- Information Request is not dependent on issuance of Initial Notice (d)(2)
- Revised the end date for issuance of a Notice of Findings (d)(3)
- Moved provisions that require submitting a Monitoring and Sampling Plan and implementation of a Monitoring and Sampling Plan that would comply with subdivision (f) into subdivision (d) [(d)(10)]
 - Streamlines provisions so owner or operator is aware of requirements if a facility is designated as a Metal TAC Monitoring Facility

Requirement	August Version	September Version
30 days from receiving designation notice, submit Monitoring and Sampling Plan	(e)(1)	(d)(10)(A)
No later than date specified in approval letter, implement Monitoring and Sampling Plan	(f)(1)	(d)(10)(B)

Reason for Initial Notice (d)(1)

August Proposed Rule	September Proposed Rule
<ul style="list-style-type: none">• May issue an Initial Notice if there is reason to believe the facility may be contributing to elevated concentrations of Metal TAC(s) or may be emitting a substantial amount of Metal TAC emissions	<ul style="list-style-type: none">• No reason specified• May issue an Initial Notice that the Executive Officer is conducting Monitoring and Sampling
<ul style="list-style-type: none">• Purpose of the Initial Notice is to provide early notice to the owner or operator to address stakeholder input• Removed reason	

Information Request and Issuance of Initial Notice (d)(2)

August Proposed Rule	September Proposed Rule
<ul style="list-style-type: none">• An owner or operator of a facility issued an Initial Notice shall comply with written requests from the Executive Officer	<ul style="list-style-type: none">• Removed reference to Initial Notice• Requires owner or operator of a facility to comply with Information Request
<ul style="list-style-type: none">• Stakeholders commented that Information Request should not be dependent on Initial Notice	

End Date of Issuance of a Notice of Findings (d)(3)

August Proposed Rule	September Proposed Rule
<ul style="list-style-type: none">• Notice of Findings can be issued at least 30 days and no later than 180 days following the issuance of an Initial Notice	<ul style="list-style-type: none">• Added that Notice of Findings can be issued no later than 180 days following the issuance of an Initial Notice or 180 days following the due date specified in the most recent Information Request, whichever is later
<ul style="list-style-type: none">• Possible that Information Request may go beyond the 180 days• Allowing 180 days after the due date of the Information Request to allow time to work with the owner or operator after information is received	

Overview of Proposed Revisions to Subdivision (d) after the September Version of PR 1480

- Revisions to reference for contribution of Metal TAC emissions in Notice of Findings (d)(3)(C) and designation of Metal TAC Monitoring Facility (d)(8)(C)
- Revisions to scheduling a meeting with the Executive Officer after receiving a Notice of Findings

Proposed Revisions for Contributions of Emissions (d)(3)(C) and (d)(8)(C)

September Proposed Rule	Proposed Revision
<ul style="list-style-type: none">• ...findings that demonstrate the facility is <i>contributing</i> to ambient levels of the Metal TAC(s) [(d)(3)(C)]• ...the facility's emissions <i>contributed</i> to the Significant Risk Level [(d)(8)(C)]	<ul style="list-style-type: none">• Remove reference to contribution of emissions• Clarify that the health risk values are based on Metal TAC emissions from the facility
<ul style="list-style-type: none">• MFASC commented that PR 1480 imposes requirements regardless of the amount of emissions or the proportion of their contribution to an exceedance of a Significant Risk Level for a toxic air contaminant	

Proposed Revisions for Requiring Written Request for Meeting (d)(4)

September Proposed Rule	Proposed Revision
<ul style="list-style-type: none">• Requires owner or operator of a facility that elects to meet with the Executive Officer to submit a written request no later than 14 days after receiving a Notice of Findings	<ul style="list-style-type: none">• Remove provision• Owner or operator can schedule a meeting at any point
<ul style="list-style-type: none">• Stakeholders commented that 14 days was too short to respond for a meeting – removing provision eliminates issue• Original concept was to encourage facility to meet with the Executive Officer• Can encourage facility to meet with Executive Officer in the notification	

Proposed Revisions for Provision for Submitting Additional Information after Notice of Findings (d)(6)

September Proposed Rule	Proposed Revision
<ul style="list-style-type: none">• Provisions that allowed information to demonstrate facility was not the source of emissions, did not reference “contributing” emissions	<ul style="list-style-type: none">• Wording can be revised to remove “contributing” to be more direct – is not emitting Metal TAC• More information regarding concerns to “attributable emissions”

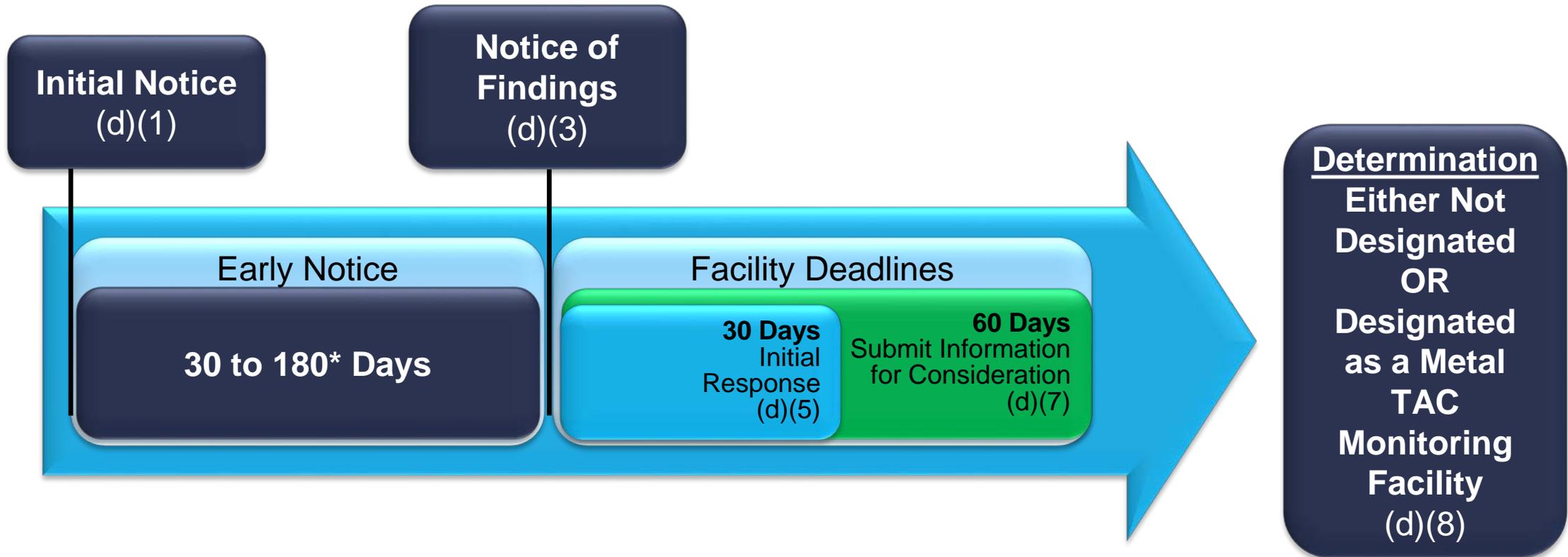
Stakeholders commented that challenging if not impossible burdens to provide evidence that:

- Facility is not contributing to an exceedance of a Significant Risk Level
- Emissions are not attributable to facility

Timeframe to Provide Additional Information for Notice of Findings (d)(7)

Stakeholder Comments	Staff Response
<ul style="list-style-type: none">• Stakeholders commented that 60 days to respond to a Notice of Findings is too short• More time needed prior to being designated a Metal TAC Monitoring Facility	<ul style="list-style-type: none">• PR 1480 built in the Initial Notification which provides at least 30 days before the Notice of Findings is issued for the owner or operator to begin collecting information• 60 days is sufficient for the owner or operator to respond to a Notice of Findings since the operator has the opportunity to begin collecting information after the Initial Notification is received

Timeline for Designating a Facility



* Or within 180 days of the most recent Information Request due date, whichever is later (d)(2)

Proposed Revision for Designation Criteria (d)(8)

September Proposed Rule	Proposed Revision
<ul style="list-style-type: none">No provision in the criteria to acknowledge implementation of source-specific rule	<ul style="list-style-type: none">Considering additional criteria for pollution controls required under source-specific toxic rule that reduces the Metal TACs for that source<ul style="list-style-type: none">Permit to Operate must be issuedInstallation and commissioning must be near - within 3 months

Stakeholders commented that PR 1480 fails to recognize, with regard to facilities subject to Rule 1469, that significant efforts are being made to comply with the rule with the result that emissions have been significantly reduced

Overview of Monitoring and Sampling Plan (e) Between August and September Versions of PR 1480

- Provisions regarding the evaluation and approval of Alternative (subdivision (g)) and Reduced (subdivision (h)) Monitoring and Sampling Plans moved to subdivision (e)
- For clarity, named the different Monitoring and Sampling Plans as Basic and Alternative Monitoring and Sampling Plans based on who conducts the monitoring and sampling
- Propose to clarify the types of Reduced Plans - Reduced Basic and Reduced Alternative Monitoring and Sampling Plans

Comparison of Monitoring and Sampling Plans - (e)

Basic Monitoring and Sampling Plan

- **Basic Monitoring and Sampling Plan** is for Metal TAC Monitoring facilities that will have a contractor conduct Monitoring and Sampling for the owner or operator

Alternative Monitoring and Sampling Plan

- **Alternative Monitoring and Sampling Plan** is for facilities where the Executive Officer or its contractor is conducting Monitoring and Sampling for the owner or operator
 - A facility may elect to submit an Alternative Plan in lieu of a Basic Plan

Reduced Monitoring and Sampling Plan

- **Reduced Monitoring and Sampling Plan** is for facilities that meet specific criteria to reduce the frequency of monitoring and/or sampling or the number of monitors
- Two types of Reduced Monitoring and Sampling Plans:
 - **Reduced Basic Monitoring and Sampling Plan**; and
 - **Reduced Alternative Monitoring and Sampling Plan**

Elements of Monitoring and Sampling Plans and Approval Process – (e)

Item	August Version	September Version
Facility-Specific and Monitoring and Sampling Information	(e)(2)	(e)(1)
Contents of a Alternative Monitoring and Sampling Plan	(g)(3) & (g)(4)	(e)(2)
Approval of a Basic or Alternative Monitoring and Sampling Plan	(e)(3)	(e)(3)
Disapproval of a Basic or Alternative Monitoring and Sampling Plan	(e)(3)(A)	(e)(4)
Approval of a Reduced Monitoring and Sampling Plan	(e)(4)(B)	(e)(5)
Disapproval of a Reduced Monitoring and Sampling Plan	(e)(4)(B)	(e)(6)
Modifications to an approved Basic, Alternative, or Reduced Monitoring and Sampling Plan	(e)(4) & (g)(5)	(e)(7) & (e)(8)

Staff is preparing a Monitoring and Sampling Plan Guidance Document to assist with preparation of plans to meet the requirements of subdivision (f)

Timeframe to Respond When a Monitoring and Sampling Plan is Not Approved (i)(4)

Comments Received	Staff Response
<ul style="list-style-type: none">Stakeholders commented that 30 days is not sufficient to correct deficiencies	<ul style="list-style-type: none">Notification that a Monitoring and Sampling Plan will specify deficiencies and what corrections are needed for approvalAnticipated deficiencies<ul style="list-style-type: none">Missing informationMonitoring and sampling information that does not meet the requirements of subdivision (f)Revisions will be specific and can be made within 30 days

Monitoring and Sampling Requirements – (f)

- Modifications were made to align the Monitoring and Sampling requirements with the required elements of a Monitoring and Sampling Plan

Requirement	August Version	September Version
Basic, Alternative, or Reduced Monitoring and Sampling Plan includes all equipment	None	(f)(1)
Operation and maintenance of sampling equipment	None	(f)(4)
Method to collect and analyze Valid Samples	None	(f)(5)
Retention of Valid Samples and associated solution	(f)(6)	(f)(6)
Provide Valid Samples to Executive Officer	(f)(6)	(f)(7)
Record wind speed and direction	None	(f)(8)
Not miss collecting more than one Valid Sample every 30 days	(f)(3)	(f)(9)

Alternative Monitoring and Sampling – (g)

- Submittal of a Alternative Monitoring and Sampling Plan is required to have the Executive Officer conduct Monitoring and Sampling
- Alternative Monitoring and Sampling Plan only contains facility specific information, the Executive Officer would provide the monitoring and sampling procedures
- Alternative Monitoring and Sampling Plan contents, approval, modification, and denial is specified in subdivision (e)

Requirement	August Version	September Version
Submittal schedule and general requirements of Alternative Monitoring and Sampling	(g)(1) & (g)(2)	(g)(1)
Transition from Alternative Monitoring and Sampling Plan to Basic Monitoring and Sampling Plan	(g)(6)	(g)(2)
Transition from Basic Monitoring and Sampling Plan to Alternative Monitoring and Sampling Plan	None	(g)(3)

Provisions if a Monitoring and Sampling Plan is Denied

	Basic Monitoring and Sampling Plan	Alternative Monitoring and Sampling Plan	Reduced Basic Monitoring and Sampling Plan	Reduced Alternative Monitoring and Sampling Plan
First disapproval of Plan	Correct deficiencies and submit	Correct deficiencies and submit	Correct deficiencies and submit or notify EO that Plan will not be submitted	Correct deficiencies and submit or notify EO that Plan will not be submitted
Second disapproval – Denial of Plan	Cease operating equipment emitting Metal TACs or Executive Officer will correct deficiencies and approve Alternative Monitoring and Sampling Plan	Executive Officer will correct deficiencies and approve Alternative Monitoring and Sampling Plan	Revert back to most recently approved Basic Monitoring and Sampling Plan	Revert back to most recently approved Alternative Monitoring and Sampling Plan

September PR 1480 Added Provisions for Switching from Alternative to Basic or Basic to Alternative Plans - (g)(2) and (g)(3)

Switching from an Alternative to a Basic Monitoring and Sampling Plan – (g)(2)

Notify the Executive Officer that owner or operator has elected to conduct monitoring and sampling to comply with (d)(10)(B)

Submit a draft Basic Monitoring and Sampling Plan for approval

Meet the requirements of (d)(10)(B)

Switching from a Basic to an Alternative Monitoring and Sampling Plan – (g)(3)

Notify the Executive Officer facility has elected to have Executive Officer conduct Monitoring and Sampling

Submit a draft Alternative Monitoring and Sampling Plan for approval

Meet the requirements of (g)(1)(B) and (g)(1)(C)

Overview of Reduced Monitoring and Sampling Frequency and/or Monitors – (h)

- Added the option to reduce the number of monitors in addition to reducing the sampling frequency
- If criteria are met, a facility may submit a Reduced Basic or Reduced Alternative Monitoring and Sampling Plan
 - Previous rule language specified that a facility must first submit a written request to the Executive Officer followed by modification to a Monitoring and Sampling Plan
- Two types of Reduced Monitoring and Sampling Plans:
 - Reduced **Basic** Monitoring and Sampling Plan
 - Reduced **Alternative** Monitoring and Sampling Plan
- Clarified that either Basic or Alternative Monitoring and Sampling Plan are eligible to reduce the frequency of monitoring and sampling or number of monitors
- Approval, denial, and modification of a Reduced Plan is specified in subdivision (e)

Transitioning to a Reduced Monitoring and Sampling Plan

Basic Monitoring and Sampling Plan

Facility Information

Monitoring and Sampling Information

- Sampling Frequency: 1-in-3 Days
- Number of monitors
- Provided by the Metal TAC Monitoring Facility



Reduced Basic Monitoring and Sampling Plan

Facility Information

Monitoring and Sampling Information

- Reduced sampling frequency to 1-in-6 days
- Reduced number of monitors
- Provided by the Metal TAC Monitoring Facility

Alternative Monitoring and Sampling Plan

Facility Information

Monitoring and Sampling Information

- Sampling Frequency: 1-in-3 Days
- Number of monitors
- Provided by the Executive Officer



Reduced Alternative Monitoring and Sampling Plan

Facility Information

Monitoring and Sampling Information

- Reduced sampling frequency to 1-in-6 days
- Reduced number of monitors
- Provided by the Executive Officer

Transitioning Between Plans

A facility that elects to switch between Basic and Alternative Monitoring and Sampling Plans is required to only update relevant information

- Basic to Alternative and Reduced Basic to Reduced Alternative Monitoring and Sampling Plan:
 - Update the part that would be conducting monitoring and sampling (i.e. from third-party contractor to South Coast AQMD)
 - Executive Officer would provide information on Monitoring and Sampling Equipment and Procedures
 - Owner or operator would pay monitoring and sampling fees
- Alternative to Basic and Reduced Alternative to Reduced Basic Monitoring and Sampling Plan:
 - Update the part that would be conducting monitoring and sampling (i.e. from South Coast AQMD to contractor hired by the facility)
 - Owner or operator would provide information on Monitoring and Sampling Equipment and Procedures
- Switching between plans does not involve creating a brand new plan
 - Much of the information would remain the same

Benchmark Concentration

- Benchmark Concentration is the average of all Valid Samples of a Metal TAC for 30 calendar days preceding the submittal of the draft Reduce Monitoring and Sampling Plan
- Executive Officer would evaluate the monitoring and sampling data preceding the request and determine the Benchmark Concentration
- Executive Officer would specify the Benchmark Concentration in the approval letter of a Reduced Basic or Reduced Alternative Monitoring Plan
- Benchmark Concentration will be used to determine if the owner or operator of Metal TAC Monitoring Facility would be required to resume a once every three day sampling schedule and/or return to original number of approved ambient monitors.

Reduced Monitoring and Sampling Frequency and/or Monitors – (h)

Facilities with →	Basic Monitoring And Sampling Plan	Alternative Monitoring and Sampling Plan
Must meet criteria in subparagraph (e)(5)(A) - (e)(5)(C)	Submit draft Reduced Basic Monitoring and Sampling Plan - (h)(1)(A)	Submit draft Reduced Alternative Monitoring and Sampling Plan - (h)(4)(A)
Upon approval of Reduced Plan	Implement no sooner than date specified on approval letter - (h)(1)(B)	Pay fees no later than date specified on approval letter - (h)(4)(B)
Notification for three consecutive exceedances of the Benchmark Concentration times 10	Owner or operator notifies Executive Officer by calling 1-800-CUT-SMOG and provides explanation of causes - (h)(2)	Executive Officer notifies owner or operator and owner or operator provides explanation of causes - (h)(5)
If exceedances attributed to facility	Revert sampling frequency and number of monitors to Basic Monitoring and Sampling Plan - (h)(3)	Revert sampling frequency and number of monitors to Alternative Monitoring and Sampling Plan - (h)(6)

Monitoring, Recordkeeping, and Reporting Requirements – (i)

Requirement	August Version	September Version
Notify Executive Officer that a Valid Sample was or won't be collected	(f)(4)	(i)(4)
Provide documentation of repairs or replacement of the monitor that was not able to collect a Valid Sample	(f)(5)	(i)(5)

Proposed Revisions for Timeframe to Report Third Exceedance of Benchmark Concentration (h)(2) or Third Exceedance of Significance Level (i)(3)

September Proposed Rule	Proposed Revision
<ul style="list-style-type: none">• Requires owner or operator of a facility to report the third exceedance of the Benchmark Concentration or Significance Level within 24 hours	<ul style="list-style-type: none">• Maintain provision for 24-hour report• Allow 3 days to provide information that the exceedance was not attributable to the facility
<ul style="list-style-type: none">• Stakeholders commented that 24 hours was not sufficient amount of time to report an exceedance and provide information that exceedance not attributed to facility	

Timeframe to Valid Sample was not Collected (i)(4)

Stakeholder Comments	Staff Response
<ul style="list-style-type: none">Stakeholders commented that 2-hour timeframe is not sufficient to report that a Valid Sample was not collected	<ul style="list-style-type: none">Basis of 2-hour timeframe is based on Rule 1420.2Staff believes that 2 hours is sufficient to report that a Valid Sample was not collectedMore information is needed on why stakeholders believe 2 hours is not a sufficient amount of time

Overview of Revisions to Discontinue Monitoring and Sampling (j) and Exemptions (k)

- Criteria to discontinue monitoring and sampling slightly modified to recognize pathway if a Risk Reduction Plan under Rule 1402 is not required
- Proposing additional pathway that acknowledges implementation of a rule that regulates the source of the Metal TAC
- No changes to Exemptions

Approval Criteria to Discontinue Monitoring and Sampling (j)(2)

August Proposed Rule	September Proposed Rule
<ul style="list-style-type: none">Criteria for approval to discontinue monitoring includes<ul style="list-style-type: none">Housekeeping measures must be incorporated in approved Risk Reduction PlanImplementation of a Rule 1402 Risk Reduction Plan	<ul style="list-style-type: none">Added that if there is no Rule 1402 Risk Reduction Plan, housekeeping measures can be included in Monitoring and Sampling Relief PlanAdded that if a Rule 1402 Risk Reduction Plan is not required, approval is based on an approved Health Risk Assessment
<ul style="list-style-type: none">Provides pathway if a facility is not required to prepare a Risk Reduction Plan	

Proposed Revisions for Approval Criteria to Discontinue Monitoring and Sampling (j)(2)

September Proposed Rule	Proposed Revision
<ul style="list-style-type: none">• Added that if a Rule 1402 Risk Reduction Plan is not required, approval is based on an approved Health Risk Assessment	<ul style="list-style-type: none">• Add another pathway that acknowledges implementation of a South Coast AQMD toxic rule that regulates the source and the Metal TAC

Stakeholders commented that PR 1480 fails to recognize, with regard to facilities subject to Rule 1469, that significant efforts are being made to comply with the rule with the result that emissions have been significantly reduced

Monitoring and Sampling Costs

- Stakeholders have commented on the monitoring and sampling costs
- Staff has modified rule requirements to allow for a reduction in number of monitors under the Reduced Monitoring and Sampling Plan
- Additional proposed modifications being considered to reduce cost or fees:
 - Reduced fees for facilities electing to have the Executive Officer conduct Monitoring and Sampling where only one field staff member is required (Approval would be based on safety and accessibility related to the installation and servicing of the monitoring equipment)
 - Use of surrogate to conduct Monitoring and Sampling, such as, monitoring for total chromium instead of hexavalent chromium

Monitoring and Sampling Fees – 1 Monitor, 2 Field Staff

- Table below reflects fees for one monitor instead of two monitors
- Assumes that two field staff are required to retrieve the samples

Type of Monitor(s)	Sampling Frequency	
	1-in-3 Days	1-in-6 Days
1 Hexavalent Chromium Monitor	\$30,000	\$15,000
1 Non-Hexavalent Chromium Monitor	\$15,500	\$8,000
1 Hexavalent Chromium Monitor and 1 Non-Hexavalent Chromium Monitor	\$39,000	\$20,000
1 Wind Monitor	\$2,000	
Each Additional Hexavalent Chromium Monitor	\$12,000	\$6,000
Each Additional Non-Hexavalent Chromium Monitor	\$7,000	\$4,000

Monitoring and Sampling Fees – 1 Monitor, 1 Field Staff

- In certain situations and upon approval from the Executive Officer, only one field staff would be required to retrieve the samples

Type of Monitor(s)	Sampling Frequency	
	1-in-3 Days	1-in-6 Days
1 Hexavalent Chromium Monitor	\$20,000	\$10,000
1 Non-Hexavalent Chromium Monitor	\$10,500	\$5,500
1 Hexavalent Chromium Monitor and 1 Non-Hexavalent Chromium Monitor	\$26,000	\$13,000
1 Wind Monitor	\$2,000	
Each Additional Hexavalent Chromium Monitor	\$9,500	\$5,000
Each Additional Non-Hexavalent Chromium Monitor	\$5,000	\$3,000

Comparison of Monitoring and Sampling Fees

Type of Monitor(s)	Sampling Frequency					
	1-in-3 Days			1-in-6 Days		
	2 Monitors 2 Staff	1 Monitor 2 Staff	1 Monitor 1 Staff	2 Monitor 2 Staff	1 Monitor 2 Staff	1 Monitor 1 Staff
Base Hexavalent Chromium Monitor	\$42,000	\$30,000	\$20,000	\$21,000	\$15,000	\$10,000
Base Non-Hexavalent Chromium Monitor	\$22,000	\$15,500	\$10,500	\$11,500	\$8,000	\$5,500
Base Hexavalent Chromium Monitor and Base Non-Hexavalent Chromium Monitor	\$60,000	\$39,000	\$26,000	\$30,000	\$20,000	\$13,000
1 Wind Monitor	\$2,000					
Each Additional Hexavalent Chromium Monitor	\$12,000		\$9,500	\$6,000		\$5,000
Each Additional Non-Hexavalent Chromium Monitor	\$7,000		\$5,000	\$4,000		\$3,000

Next Steps

Stationary Source Committee: October 18, 2019



Set Hearing: November 1, 2019



Governing Board Meeting: December 6, 2019



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