



BOOSTER

Booster Fuels, Inc.
1840 Gateway Drive
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San Mateo, CA 94404

VIA EMAIL

June 30, 2021

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

RE: Rule 461 Rulemaking

Dear Susan,

I hope all is well with you. I wanted to follow up regarding last week's stakeholder meeting regarding the Rule 461 rulemaking (SCAQMD R 461 & 219 and R 461.1, Working Group Meeting #5 on June 24, 2021).

First, I want to say that we are grateful for the movement the District has made with respect to allowing ORVR-based operations to be permitted under the proposed rule. However, we were surprised and confused about the current stance that ORVR-based operations would be permitted for fleet customers but not for "consumer" or "campus" operations (i.e., app-based services). Specifically, we do not understand or agree with the distinction being made between fleet and non-fleet operations.

As you know, determining whether a vehicle is equipped with ORVR or not essentially requires one data point to begin with: a vehicle's license plate number. After that, it is a matter of determining the VIN number, and then the make, model, year and build of the vehicle, in order to accurately determine whether the vehicle has ORVR. There is no difference in this process whether the vehicle is part of a fleet or is a privately-owned personal vehicle. Furthermore, as you are aware, CARB recently issued an executive order which not only certifies our vehicle and equipment, but that specifically certifies our ORVR processes, and the executive order makes no distinction between fleet and non-fleet operations. Given this, we do not understand why the District would propose a rule that draws this arbitrary line. Under its R&D permits, Booster has been developing and perfecting a system which determines whether a vehicle ORVR. Hence, we propose that R461.1 require a CARB certified mobile fueling system (as set forth in the executive order that Booster received from CARB) with an accurate ORVR system to allow for the District's inspection and record review. This is the process currently being employed by the

Sacramento Metropolitan Air Quality Management District, and what we expect to be required by the Ventura County Air Pollution Control District, the Yolo-Solano Air Quality Management District, and the El Dorado Air Quality Management District, based upon our recent conversations with these three air districts.

Furthermore, drawing this arbitrary line will harm the people who need mobile fueling options the most: namely, people with disabilities who are able to drive. Booster Fuels has the support of nearly a dozen disability rights organizations because of the significant value that mobile fueling provides to their members, and we would be happy to connect you with any of these organizations if you would like to hear firsthand how important mobile fueling options are to them.

As always, thank you and your team for the time and effort that you are putting into this process. We are happy to be a resource as you go through this rulemaking, and we would be glad to meet with you to discuss this or any other issues relating to the rulemaking process.

Thank you for your attention to this matter.

Best regards,

A handwritten signature in black ink, appearing to read "Joe Okpaku". The signature is fluid and cursive, with the first name "Joe" being more prominent and the last name "Okpaku" following in a similar style.

Joseph Okpaku
Chief Policy Officer
Booster Fuels