



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

REVISED A G E N D A

HYBRID GOVERNING BOARD MEETING AUGUST 1, 2025

A meeting of the South Coast Air Quality Management District Board will be held at 9:00 a.m. on Friday, August 1, 2025 through a hybrid format of in-person attendance in the Dr. William A. Burke Auditorium at the South Coast AQMD Headquarters, 21865 Copley Drive, Diamond Bar, California 91765 and/or virtual attendance via videoconferencing and by telephone. Please follow the instructions below to join the meeting remotely.

Please refer to South Coast AQMD's website for information regarding the format of the meeting, updates, and details on how to participate at: <http://www.aqmd.gov/home/news-events/meeting-agendas-minutes>.

| | |
|--|--|
| <p>Electronic Participation Information (Instructions provided at the bottom of the agenda)</p> | <p>Join Zoom Meeting - from PC, Laptop or Phone https://scaqmd.zoom.us/j/93128605044 Meeting ID: 931 2860 5044 (applies to all) Teleconference Dial In +1 669 900 6833 or +1 253 215 8782 One tap mobile +16699006833,,93128605044# or +12532158782,,93128605044#</p> <p>Spanish Language Only Audience (telephone) Número Telefónico para la Audiencia que Habla Español Teleconference Dial In/Numero para llamar: +1 669 900 6833 Meeting ID/Identificación de la reunión: 932 0955 9643 One tap mobile: +16699006833,,93209559643</p> |
| <p>Public Comment Will Still Be Taken</p> | <p>Audience will be allowed to provide public comment in person and through Zoom connection or telephone. Comments are limited to three (3) minutes per person for all items on the Consent and Board Calendars and may be further limited by the Chair to ensure all can be heard.</p> <p>Phone controls for participants: The following commands can be used on your phone's dial pad while in meeting: *6 (Toggle mute/unmute); *9 - Raise hand</p> |
| <p>Questions About an Agenda Item</p> | <ul style="list-style-type: none">▪ The name and telephone number of the appropriate staff person to call for additional information or to resolve concerns is listed for each agenda item.▪ In preparation for the meeting, you are encouraged to obtain whatever clarifying information may be needed to allow the Board to move expeditiously in its deliberations. |

Meeting Procedures

- The public meeting of the South Coast AQMD Governing Board begins at 9:00 a.m. The Governing Board generally will consider items in the order listed on the agenda. However, any item may be considered in any order.
- After taking action on any agenda item not requiring a public hearing, the Board may reconsider or amend the item at any time during the meeting.

All documents (i) constituting non-exempt public records, (ii) relating to an item on the agenda, and (iii) having been distributed to at least a majority of the Governing Board after the agenda is posted, are available prior to the meeting for public review at South Coast AQMD's Clerk of the Boards Office, 21865 Copley Drive, Diamond Bar, CA 91765 or web page at www.aqmd.gov

Americans with Disabilities Act and Language Accessibility

Disability and language-related accommodations can be requested to allow participation in the Governing Board meeting. The agenda will be made available, upon request, in appropriate alternative formats to assist persons with a disability (Gov. Code Section 54954.2(a)). In addition, other documents may be requested in alternative formats and languages. Any disability or language-related accommodation must be requested as soon as practicable. Requests will be accommodated unless providing the accommodation would result in a fundamental alteration or undue burden to the South Coast AQMD. Please contact the Clerk of the Boards Office at (909) 396-2500 from 7:00 a.m. to 5:30 p.m., Tuesday through Friday, or send the request to cob@aqmd.gov.

A webcast of the meeting is available for viewing at:

<http://www.aqmd.gov/home/news-events/webcast>

CALL TO ORDER

- Pledge of Allegiance
- Roll Call
- Opening Comments: Vanessa Delgado, Chair
Other Board Members
Wayne Nastri, Executive Officer

Staff/Phone (909) 396-

PUBLIC COMMENT PERIOD – (Public Comment on Non-Agenda Items, Pursuant to Government Code Section 54954.3) The public may comment on any subject within the South Coast AQMD’s authority that does not appear on the agenda, during the Public Comment Period. Each speaker addressing non-agenda items may be limited to a total of (3) minutes.

CONSENT AND BOARD CALENDAR (Items 1 through 22)

Note: Consent and Board Calendar items held for discussion will be moved to Item No. 23.

Items 1 and 2 – Action Items/No Fiscal Impact

- | | |
|---|--------------------|
| 1. Approve Minutes of June 6, 2025 | Thomas/3268 |
| 2. Set Public Hearing September 5, 2025 to Consider Adoption of and/or Amendments to South Coast AQMD Rules and Regulations: | Nastri/3131 |
| A. Determine That Proposed Amended Rule 223 – Requirements for Confined Animal Facilities, Is Exempt from CEQA; Amend Rule 223; and Submit Rule 223 Into State Implementation Plan Proposed Amended Rule 223 (PAR 223) will implement control measure BCM-08 – Emission Reductions from Livestock Waste at Confined Animal Facilities, from the South Coast Air Basin 2024 Attainment Plan for the 2012 Annual PM2.5 National Ambient Air Quality Standard, and comply with the federal Clean Air Act requirements for Most Stringent Measures. The proposed amended rule will lower the applicability thresholds for large confined animal facilities that are required to obtain permits and implement emission reduction mitigation measures. This action is to adopt the Resolution: 1) Determining that PAR 223 – Requirements for Confined Animal Facilities, is exempt from the requirements of the California Environmental Quality Act; 2) Amending Rule 223; and 3) Directing staff to submit PAR 223 – Requirements for Confined Animal Facilities for inclusion into the State Implementation Plan. (Reviewed: Stationary Source Committee, June 20, 2025) | Krause/2706 |

- B. Determine That Proposed Amended Rule 445 – Wood-Burning Devices, Is Exempt from CEQA; Amend Rule 445; and Submit Rule 445 Into State Implementation Plan

Krause/2706

Proposed Amended Rule 445 (PAR 445) will address federal Clean Air Act requirements for Most Stringent Measure and implement BCM-18: Further Emission Reductions from Wood-Burning Fireplaces and Wood Stoves of the South Coast Air Basin Attainment Plan for the 2012 Annual PM_{2.5} National Ambient Air Quality Standard. The PM_{2.5} curtailment threshold for calling a no-burn day will be lowered and the exemption of low-income households from a no-burn day will be removed. A new provision is added to address rebuilds due to wildfires. This action is to adopt the Resolution: 1) Determining that PAR 445 – Wood-Burning Devices, is exempt from the requirements of the California Environmental Quality Act; 2) Amending Rule 445 – Wood-Burning Devices; and 3) Directing staff to submit PAR 445 – Wood-Burning Devices for inclusion into the State Implementation Plan. (Reviewed: Stationary Source Committee, June 20, 2025)

- C. Determine That Proposed Amended Rules 1133, 1133.1, 1133.2, and 1133.3, Are Exempt from CEQA; Amend Rules 1133, 1133.1, 1133.2, and 1133.3; and Submit Rules 1133, 1133.1, 1133.2, and 1133.3 Into State Implementation Plan

Krause/2706

Proposed Amended Rule (PAR) 1133, PAR 1133.1, PAR 1133.2, and PAR 1133.3, will further reduce VOC and ammonia emissions from chipping and grinding operations, co-composting operations, and composting operations by regulating the supply of uncomposted greenwaste for direct land application. Additionally, PAR 1133.2 will introduce composting best management practices for previously uncontrolled existing co-composting operations. This action is to adopt the Resolution: 1) Determining That PAR 1133 – Emission Reductions from Direct Land Application, PAR 1133.1 – Chipping and Grinding Operations, PAR 1133.2 – Emission Reductions from Co-composting Operations, and PAR 1133.3 – Emission Reductions from Composting Operations are exempt from the requirements of the California Environmental Quality Act; 2) Amending Rules 1133, 1133.1, 1133.2, and 1133.3; and 3) Directing staff to submit PARs 1133, 1133.1, 1133.2, and 1133.3 for inclusion into the State Implementation Plan. (Reviewed: Stationary Source Committee, June 20, 2025)

- D. Determine That Proposed Amended Rule 1138 – Control of Emissions From Restaurant Operations, Is Exempt from CEQA; Amend Rule 1138; Submit Rule 1138 Into State Implementation Plan

MacMillan/3244

Proposed Amended Rule 1138 (PAR 1138) will address federal Clean Air Act requirements for Most Stringent Measures and partially implement a control measure from the South Coast Air Basin Attainment Plan for the 2012 Annual PM 2.5 Standard. The current exemption threshold will be lowered, and an alternative exemption option will be added, to be consistent with similar but more stringent rules adopted by other air districts in California. This action is to adopt the Resolution: 1) Determining that (PAR) 1138 – Control of Emissions From Restaurant Operations, is exempt from the requirements of the California Environmental Quality Act; 2) Amending Rule 1138– Control of Emissions From Restaurant Operations; and 3) Directing staff to submit (PAR) 1138 – Control of Emissions From Restaurant Operations, for inclusion into the State Implementation Plan (Reviewed: Stationary Source Committee, June 20, 2025)

Items 3 through 7 – Budget/Fiscal Impact

3. Issue Program Announcements for Battery Electric Class 8 Trucks, Cargo Handling Equipment and Charging Infrastructure for INVEST CLEAN Program

Katzenstein/2219

In September 2024 the Board recognized an award of \$499,997,415 from the U.S. EPA titled Infrastructure, Vehicles, and Equipment Strategy for Climate, Equity, Air Quality, and National Competitiveness (INVEST CLEAN). The program comprises four incentive measures, including the deployment of battery-electric Class 8 trucks and last-mile freight vehicles, cargo handling equipment, switcher locomotives, and charging infrastructure. A total of up to \$178,500,000, \$28,000,000, and \$20,600,000 for the Infrastructure, Class 8 Freight Vehicle Deployment and Cargo Handling Equipment Measures, respectively, will be reimbursed from the U.S. EPA INVEST CLEAN grant and administered from the U.S. EPA CPRG Special Revenue Fund (90). SCAG will implement the Last-Mile Freight Program totaling \$50 million in rebates. These actions are to: 1) issue and, if necessary, re-issue Program Announcements for Battery Electric Class 8 Trucks, Cargo Handling Equipment, and Charging Infrastructure under INVEST CLEAN; and 2) authorize the Executive Officer to execute contracts for eligible projects selected through these solicitations from the U.S. EPA CPRG Special Revenue Fund (90). (Reviewed: Technology Committee, June 20, 2025; Recommended for Approval)

4. Issue Program Announcement, Transfer Funds, and Execute Agreements for CHDV ELECTRIC Program and Amend Awards for Carl Moyer Program

Katzenstein/2219

In January 2025, South Coast AQMD recognized an award of \$33,898,522, including administrative costs, from the U.S. EPA 2024 Clean Heavy-Duty Vehicles (CHDV) Grant Program. The awarded proposal titled “Empowering Local Environmental Change Through Replacing Internal Combustion with Battery Electric Class 6 or 7 Vehicles” (ELECTRIC) is designed to replace diesel or gasoline-powered Class 6 and 7 freight delivery vehicles with zero-emission vehicles. These actions are to: (1) issue a Program Announcement to solicit projects for ELECTRIC, (2) execute agreements with eligible applicants, (3) appropriate \$75,000 from the General Fund Undesignated (Unassigned) Fund Balance into Information Management’s FY 2025-26 Budget, Services and Supplies and/or Capital Outlays Major Objects for modifying the existing online application system to accept ELECTRIC applications, and (4) authorize the Executive Officer to amend awards and execute contract with Two Brothers Fishery LLC for up to \$200,000 under the Carl Moyer Program Fund (32) and with EV Mill Tenant LLC under the Community Air Protection AB 134 Fund (77). (Reviewed: Technology Committee, June 20, 2025; Recommended for Approval)

5. Establish Lists of Prequalified Contractors for Legal Services, and for Occupational Health and Medical Services; Authorize Contracts and Funding for Services; and Execute a Contract for Insurance Brokerage Services

Olvera/2309

On January 10, 2025, the Board approved the release of RFPs to prequalify outside legal counsel for employee labor relations matters, occupational health and medical services providers, and insurance brokerage services. This action is to establish lists of prequalified legal counsel, and occupational health and medical services providers, and to authorize contracts and funding for these services. This action is also to execute a three-year contract with Alliant Insurance Services, Inc. for insurance brokerage services, in an amount not to exceed \$149,960 for the contract term. Funding is available in the FY 2025-26 Budget and will be requested in successive fiscal years. (Reviewed: Administrative Committee, June 13, 2025; Recommended for Approval)

6. Authorize Executive Officer to Negotiate and Execute MOU With County of Riverside Transportation Department for Assembly Bill 617 Eastern Coachella Valley Paving Projects and Reimburse County of Riverside Transportation Department for Administrative Costs

Shen/2487

Through community-led participatory budgeting workshops in 2021, the Assembly Bill 617 (AB 617) Eastern Coachella Valley (ECV) Community Steering Committee prioritized \$4.57 million in

Year 3 Community Air Protection Incentive funding for implementation of paving projects within the ECV community. The County of Riverside Transportation Department is qualified to implement paving projects in the AB 617 ECV community. South Coast AQMD will partner with the County of Riverside Transportation Department through an MOU agreement to initiate the paving projects. These actions are to: 1) authorize the Executive Officer to negotiate and execute an MOU with the County of Riverside Transportation Department to pave prioritized properties in ECV; (2) appropriate up to \$4.57 million from the Community Air Protection AB 134 Fund (77) to spend towards the implementation of paving projects in ECV; and (3) reimburse the County of Riverside Transportation Department for construction, administrative and contingency costs. (Reviewed: Stationary Source Committee, June 20, 2025; Recommended for Approval)

7. Approve Modified Contract Award, Contract Modification, and Fund Transfer for Miscellaneous and Direct Expenditures Costs in FY 2025-26 as Approved by MSRC

McCallon

As part of their FYs 2024-27 Work Program, the MSRC approved a value increase to the contract with Geographics for hosting and maintenance of the MSRC's website. The MSRC also approved the addition of FM Harbor LLC as a party to a previous award to Forum Mobility Inc. to install electric vehicle service equipment in partial fulfillment of MOUs with the Ports of Long Beach and Los Angeles. Additionally, every year the MSRC adopts an Administrative Budget which includes transfer of funds to the South Coast AQMD Budget to cover administrative expenses. The MSRC seeks Board approval of the contract and award modifications and fund transfer. (Reviewed: Mobile Source Air Pollution Reduction Review Committee, June 12, 2025; Recommended for Approval)

Items 8 through 14 – Information Only/Receive and File

8. Legislative, Public Affairs and Media Report

Tanaka/3327

This report highlights the May and June 2025 outreach activities of the Legislative, Public Affairs and Media Office, which includes: Major Events, Community Events/Public Meetings, Environmental Justice Update, Speakers Bureau/Visitor Services, Communications Center, Public Information Center, Small Business Assistance, Media Relations, and Outreach to Community Groups and Governments. (No Committee Review)

9. Hearing Board Report

Ali

This reports the actions taken by the Hearing Board during the period of May 1 through June 30, 2025. (No Committee Review)

10. Civil Filings and Civil Penalties Report **Gilchrist/3459**
This report summarizes monthly penalties and legal actions filed by the General Counsel's Office from May 1, 2025 through May 31, 2025. An Index of South Coast AQMD Rules is attached with the penalty report. (Reviewed: Stationary Source Committee, June 20, 2025)
11. Intergovernmental Review of Environmental Documents and CEQA Lead Agency Projects **Krause/2706**
This report provides a listing of environmental documents prepared by other public agencies seeking review by South Coast AQMD between May 1, 2025 and June 30, 2025, and proposed projects for which South Coast AQMD is acting as lead agency pursuant to CEQA. (Reviewed: Mobile Source Committee, June 20, 2025 for May 1 to May 31, 2025 portion of the report; the June 1 to June 30, 2025 portion of the report had no committee review)
12. Rule and Control Measure Forecast **Rees/2856**
This report highlights South Coast AQMD rulemaking activities and public hearings scheduled for 2025.
(No Committee Review)
13. Report of RFQs/RFPs Scheduled for Release in August **Jain/2804**
This report summarizes the RFQs/RFPs for budgeted services over \$100,000 scheduled to be released for advertisement for the month of August. (Reviewed: Administrative Committee, June 13, 2025)
14. Status Report on Major Ongoing and Upcoming Projects for Information Management **Moskowitz/3329**
Information Management is responsible for data systems management services in support of all South Coast AQMD operations. This action is to provide the monthly status report on major automation contracts and planned projects. (Reviewed: Administrative Committee, June 13, 2025)

Items 15 through 22 – Reports for Committees, MSRC, and CARB

- | | | |
|---|------------------|-------------------------|
| 15. Administrative Committee (Receive & File) | Chair: Delgado | Nastri/3131 |
| 16. Investment Oversight Committee (Receive & File) | Chair: Cacciotti | Jain/2804 |
| 17. Legislative Committee (Receive & File) | Chair: Cacciotti | Tanaka/3327 |
| 18. Mobile Source Committee (Receive & File) | Chair: Delgado | Rees/2856 |
| 19. Stationary Source Committee (Receive & File) | Chair: McCallon | Aspell/2491 |
| 20. Technology Committee (Receive & File) | Chair: Rodriguez | Katzenstein/2219 |

21. Mobile Source Air Pollution Board Rep.: Hagman **Katzenstein/2219**
Reduction
Review committee (Receive & File)
22. California Air Resources Board Board Rep.: Lock Dawson **Thomas/3268**
Monthly Report (Receive & File)
23. Items Deferred from Consent and Board Calendar

STAFF PRESENTATION/BOARD DISCUSSION

24. Choose an Option to Address Development of a Marine Ports Facility-Based Mobile Source Measure (Presentation in Lieu of Board Letter) **MacMillan/3244**
- Staff is developing Proposed Rule 2304 – Commercial Marine Ports (PR 2304) that would require the Ports of Los Angeles and Long Beach to develop a fueling and charging infrastructure plan, and then implement that plan. On July 18, the Ports submitted a Draft Cooperative Agreement to South Coast AQMD. This presentation will provide an overview of the current PR 2304 rulemaking and the Ports’ proposal, and provide options for the Board’s consideration. This action is to seek Board input and to direct staff on which option to pursue for this Marine Port Facility-Based Mobile Source Measure. (No Committee Review.)

PUBLIC HEARINGS

25. Determine That South Coast Air Basin Contingency Measure SIP Revision for 2015 8-Hour Ozone NAAQS Is Exempt from CEQA; and Adopt South Coast Air Basin Contingency Measure SIP Revision for 2015 8-Hour Ozone NAAQS **Rees/2856**
- The South Coast Air Basin is classified as “extreme” nonattainment for the 2015 8-hour ozone National Ambient Air Quality Standard (NAAQS). The 2022 AQMP outlined a strategy to meet the NAAQS and aimed to satisfy all federal CAA requirements applicable to extreme nonattainment areas, except for the contingency measure requirement which was not finalized. In December 2024, U.S. EPA finalized its contingency measure guidance. The South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone Standard was developed in response to U.S. EPA’s new guidance to fulfill the requirements specified in CAA sections 172(c)(9) and 182(c)(9). The contingency measures for this standard include three South Coast AQMD rules to achieve additional VOC reductions and CARB’s California Smog Check Contingency Measure. This action is adopt the Resolution: 1) Determining that the South Coast Air

Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS is exempt from the requirements of CEQA; and 2) Adopting the South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS and directing staff to forward the SIP Revision to CARB for approval and submission to U.S. EPA for inclusion in the SIP. (Reviewed: Mobile Source Committee, April 18, 2025)

26. Determine That Proposed Amended Rule 462 – Organic Liquid Loading, Is Exempt from CEQA; Amend Rule 462; and Submit Rule 462 Into State Implementation Plan

Krause/2706

Rule 462 controls VOC emissions during the loading of organic liquids into transport vessels. Proposed Amended Rule 462 (PAR 462) will further reduce VOC emissions by requiring enhanced leak detection using optical gas imaging and reducing the VOC limit for vapor control systems. Additionally, PAR 462 will introduce a contingency measure to fulfill Clean Air Act requirements. This action is to adopt the Resolution: 1) Determining that Proposed Amended Rule 462 – Organic Liquid Loading, is exempt from the requirements of the California Environmental Quality Act; 2) Amending Rule 462 – Organic Liquid Loading; and 3) Directing staff to submit Proposed Amended Rule 462 – Organic Liquid Loading for inclusion into the State Implementation Plan. (Reviewed: Stationary Source Committee, May 16, 2025)

BOARD MEMBER TRAVEL – (No Written Material)

Board member travel reports have been filed with the Clerk of the Boards, and copies are available upon request.

CLOSED SESSION -- (No Written Material)

Gilchrist/3459

CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION

It is necessary for the Board to recess to closed session pursuant to Government Code sections 54956.9(a) and 54956.9(d)(1) to confer with its counsel regarding pending litigation which has been initiated formally and to which the South Coast AQMD is a party. The actions are:

- South Coast Air Quality Management District, et al. v. NHTSA, EPA, et al., United States Court of Appeals, D.C. Circuit, Case No. 20-1173 (consolidated with Competitive Enterprise Institute, et al. v. NHTSA, No. 20-1145);
- Natural Resources Defense Council, et al. v. City of Los Angeles, et al., San Diego Superior Court, Case No. 37-2021-00023385-CU-TT-CTL (China Shipping Case) (transferred from Los Angeles Superior Court, Case No. 20STCP02985); Fourth District Court of Appeal, Division One, No. D080902;
- In the Matter of South Coast Air Quality Management District v. Baker Commodities, South Coast AQMD Hearing Board Case No. 6223-1 (Order for Abatement);
- Western States Trucking Association, Inc. v. EPA, et al., United States Court of Appeals, United States Court of Appeals, D.C. Circuit, Case No. 23-1143 (amicus brief);

- Rinnai America Corp. et al. v. South Coast Air Quality Management District, U.S. District Court for the Central District of California, Case No. 2:24-cv-10482;
- Eng v. EPA, et al., United States Court of Appeals for Ninth Circuit, Case No. 25-138;
- Chanell Scott v. South Coast Air Quality Management District, et.al., Los Angeles Superior Court Case No. 25VCV00502;
- Jason Konopisos and Tara Norris v. South Coast Air Quality Management District et al., Los Angeles Superior Court Case No. 25STCV12152; U.S. District Court for the Central District of California, Case No. 2:25-cv-05683;
- San Joaquin Valley Unified Air Pollution Control Dist. v. Setton Pistachio of Terra Bella, Inc., Court of Appeal, Fifth Appellate Dist., Civ. No. F088471 (amicus brief); and
- Communities for a Better Arvin, et al., v. U.S. Environmental Protection Agency, et al., United States Court of Appeals, Ninth Circuit, Case No. 24-7270 (amicus brief).

CONFERENCE WITH LEGAL COUNSEL – INITIATING LITIGATION

It is also necessary for the Board to recess to closed session pursuant to Government Code section 54956.9(a) and 54956.9(d)(4) to consider initiation of litigation (four cases).

CONFERENCE WITH LEGAL COUNSEL – ANTICIPATED LITIGATION

Also, it is necessary for the Board to recess to closed session pursuant to Government Code section 54956.9(d)(2) to confer with its counsel because there is a significant exposure to litigation against the South Coast AQMD (two cases).

CONFERENCE WITH LABOR NEGOTIATORS

It is also necessary to recess to closed session pursuant to Government Code section 54957.6 to confer with labor negotiators:

Agency Designated Representative: A. John Olvera, Deputy Executive Officer – Administrative & Human Resources;

- Employee Organization(s): Teamsters Local 911, and South Coast AQMD Professional Employees Association; and
- Unrepresented Employees: Executive Officer, General Counsel, Designated Deputies and Management and Confidential employees.

ADJOURNMENT

*****PUBLIC COMMENTS*****

Members of the public are afforded an opportunity to speak on any agenda item before consideration of that item. Persons wishing to speak may do so in person or remotely via Zoom or telephone. To provide public comments via a Desktop/Laptop or Smartphone, click on the "Raise Hand" at the bottom of the screen, or if participating via Dial-in/Telephone Press *9. This will signal to the host that you would like to provide a public comment and you will be added to the list.

All agendas are posted at South Coast AQMD Headquarters, 21865 Copley Drive, Diamond Bar, California, and website, <http://www.aqmd.gov/home/news-events/meeting-agendas-minutes>, at least 72 hours in advance of the meeting. At the beginning of the agenda, an opportunity is also provided for the public to speak on any subject within the South Coast AQMD's authority. Speakers may be limited to a total of three (3) minutes for the entirety of the Consent Calendar plus Board Calendar, and three (3) minutes or less for each of the other agenda items.

Note that on items listed on the Consent Calendar and the balance of the agenda any motion, including action, can be taken (consideration is not limited to listed recommended actions). Additional matters can be added and action taken by two-thirds vote, or in the case of an emergency, by a majority vote. Matters raised under the Public Comment Period may not be acted upon at that meeting other than as provided above.

Written comments will be accepted by the Board and made part of the record. Individuals who wish to submit written or electronic comments must submit such comments to the Clerk of the Board, South Coast AQMD, 21865 Copley Drive, Diamond Bar, CA 91765-4178, (909) 396-2500, or to cob@aqmd.gov, on or before 5:00 p.m. on the Tuesday prior to the Board meeting.

ACRONYMS

| | |
|---|--|
| AQ-SPEC = Air Quality Sensor Performance Evaluation Center | NAAQS = National Ambient Air Quality Standards |
| AQIP = Air Quality Investment Program | NATTS = National Air Toxics Trends Station |
| AQMP = Air Quality Management Plan | NESHAPS = National Emission Standards for Hazardous Air Pollutants |
| AVR = Average Vehicle Ridership | NGV = Natural Gas Vehicle |
| BACT = Best Available Control Technology | NOx = Oxides of Nitrogen |
| BARCT = Best Available Retrofit Control Technology | NSPS = New Source Performance Standards |
| Cal/EPA = California Environmental Protection Agency | NSR = New Source Review |
| CARB = California Air Resources Board | OEHHA = Office of Environmental Health Hazard Assessment |
| CEMS = Continuous Emissions Monitoring Systems | PAMS = Photochemical Assessment Monitoring Stations |
| CEC = California Energy Commission | PEV = Plug-In Electric Vehicle |
| CEQA = California Environmental Quality Act | PHEV = Plug-In Hybrid Electric Vehicle |
| CE-CERT = College of Engineering-Center for Environmental Research and Technology | PM10 = Particulate Matter ≤ 10 microns |
| CNG = Compressed Natural Gas | PM2.5 = Particulate Matter ≤ 2.5 microns |
| CO = Carbon Monoxide | RECLAIM=Regional Clean Air Incentives Market |
| DOE = Department of Energy | RFP = Request for Proposals |
| EV = Electric Vehicle | RFQ = Request for Quotations |
| EV/BEV = Electric Vehicle/Battery Electric Vehicle | RFQQ=Request for Qualifications and Quotations |
| FY = Fiscal Year | SCAG = Southern California Association of Governments |
| GHG = Greenhouse Gas | SIP = State Implementation Plan |
| HRA = Health Risk Assessment | SOx = Oxides of Sulfur |
| LEV = Low Emission Vehicle | SOON = Surplus Off-Road Opt-In for NOx |
| LNG = Liquefied Natural Gas | SULEV = Super Ultra Low Emission Vehicle |
| MATES = Multiple Air Toxics Exposure Study | TCM = Transportation Control Measure |
| MOU = Memorandum of Understanding | ULEV = Ultra Low Emission Vehicle |
| MSERCs = Mobile Source Emission Reduction Credits | U.S. EPA = United States Environmental Protection Agency |
| MSRC = Mobile Source (Air Pollution Reduction) Review Committee | VOC = Volatile Organic Compound |
| | ZEV = Zero Emission Vehicle |

INSTRUCTIONS FOR ELECTRONIC PARTICIPATION

Instructions for Participating in a Virtual Meeting as an Attendee

As an attendee, you will have the opportunity to virtually raise your hand and provide public comment.

Before joining the call, please silence your other communication devices such as your cell or desk phone. This will prevent any feedback or interruptions during the meeting.

For language interpretation:

Click the interpretation Globe icon at the bottom of the screen

Select the language you want to hear (either English or Spanish)

Click "Mute Original Audio" if you hear both languages at the same time.

Para interpretación de idiomas:

Haga clic en el icono de interpretación el globo terráqueo en la parte inferior de la pantalla

Seleccione el idioma que desea escuchar (inglés o español)

Haga clic en "Silenciar audio original" si escucha ambos idiomas al mismo tiempo.

Please note: During the meeting, all participants will be placed on Mute by the host. You will not be able to mute or unmute your lines manually.

After each agenda item, the Chair will announce public comment.

Speakers may be limited to a total of 3 minutes for the entirety of the consent calendar plus board calendar, and three minutes or less for each of the other agenda items.

A countdown timer will be displayed on the screen for each public comment.

If interpretation is needed, more time will be allotted.

Directions to provide public comment on ZOOM from a DESKTOP/LAPTOP or SMARTPHONE:

Click on the "Raise Hand" feature at the bottom of the screen.

This will signal to the host that you would like to provide a public comment and you will be added to the list.

Directions to provide public comment via TELEPHONE:

Dial *9 on your keypad to signal that you would like to comment.

Directions for Spanish Language TELEPHONE line only:

- The call in number is the same (+1 669 900 6833)
- The meeting ID number is 928-3000-3925
- If you would like to make public comment, please dial *9 on your keypad to signal that you would like to comment.

Instrucciones para la línea de TELÉFONO en español únicamente:

- El número de llamada es el mismo (+1 669900 6833 o +1 93209559643)
- El número de identificación de la reunión es 928-3000-3925
- Si desea hacer un comentario público, marque *9 en su teclado para indicar que desea comentar.

[↑ Back to Agenda](#)

BOARD MEETING DATE: August 1, 2025

AGENDA NO. 1

MINUTES: Governing Board Monthly Meeting

SYNOPSIS: Attached are the Minutes of the June 6, 2025
Board Meeting.

RECOMMENDED ACTION:

Approve the June 6, 2025 Board Meeting Minutes.

Faye Thomas
Clerk of the Boards

FT

FRIDAY, JUNE 6, 2025

Notice having been duly given, the meeting of the South Coast Air Quality Management District Board was conducted in a hybrid format of in-person attendance in the Dr. William A. Burke Auditorium at the South Coast AQMD Headquarters, 21865 Copley Drive, Diamond Bar, California 91765, and remotely via videoconferencing and telephone.

Members Present:

Senator Vanessa Delgado (Ret.), Chair
Senate Rules Committee Appointee

Councilmember Michael A. Cacciotti, Vice Chair
Cities of Los Angeles County – Eastern Region

Mayor Patricia Lock Dawson
Cities of Riverside County

Supervisor Curt Hagman
County of San Bernardino

Mayor Pro Tem Larry McCallon
Cities of San Bernadino County

Supervisor Holly J. Mitchell (Left at 3:04 p.m.)
County of Los Angeles

Supervisor Janet Nguyen
County of Orange

Vice Mayor Brenda Olmos
Cities of Los Angeles County – Western Region

Board Member Veronica Padilla-Campos
Speaker of the Assembly Appointee

Supervisor V. Manuel Perez (Left at 3:00 p.m.)
County of Riverside

Councilmember Nithya Raman (Left at 3:04 p.m.)
City of Los Angeles

Mayor Pro Tem Carlos Rodriguez
Cities of Orange County

Vacant: Governor's Appointee

For additional details of the Governing Board Meeting, please refer to the recording of the [Webcast](#) at: Live Webcast ([aqmd.gov](#))

CALL TO ORDER: Chair Delgado called the meeting to order at 9:06 a.m.

- Pledge of Allegiance: Led by Supervisor V. Manuel Perez
- Roll Call
- Opening Comments

Executive Officer Wayne Nastri recommended changing the order of the agenda, due to extensive public comments for the PARs 1111 & 1121 Public Hearing. Chair Delgado concurred with the recommendations. For additional details, please refer to the [Webcast](#) beginning at 7:18.

Items were taken out of order.

CONSENT AND BOARD CALENDAR

Items 1 and 2 – Action Items/No Fiscal Impact

1. Approve Minutes of May 2, 2025 Board Meeting
2. Set Public Hearing August June 6, 2025 to Consider Adoption of and/or Amendments to South Coast AQMD Rules and Regulations:
 - A. Determine That Proposed Amended Rule 462 – Organic Liquid Loading, Is Exempt from CEQA; Amend Rule 462; and Submit Rule 462 Into the State Implementation Plan
 - B. Determine That South Coast Air Basin Contingency Measure SIP Revision for 2015 8-Hour Ozone Standard Is Exempt from CEQA; and Adopt South Coast Air Basin Contingency Measure SIP Revision for 2015 8-Hour Ozone Standard

Items 3 through 14 – Budget/Fiscal Impact

3. Adopt Resolution and Accept Terms and Conditions, Recognize Revenue, Execute Agreements to Deploy Battery Electric Trucks and Chargers, and Demonstrate a Fast-Charging Capable Truck, Transfer Funds, and Reimburse General Fund
4. Issue RFP for Battery Electric Switcher Locomotives for CPRG INVEST CLEAN Program
5. Modify Contracts and SEP Agreements for Installation and/or Maintenance of Air Filtration Systems in Schools and Residences and Execute New and Modify Existing School Site Access Agreements
6. Recognize Revenue and Appropriate Funds for U.S. EPA Pass Through Grant to Develop Reference Method for Validating Open-Path Remote Sensing Systems

7. Recognize Revenue, Appropriate Funds, and Issue Sole Source Purchase Orders for Air Monitoring Equipment
8. Recognize Revenue, Appropriate Funds, and Issue Purchase Order for Air Monitoring Equipment
9. Recognize Revenue, Appropriate and Transfer Funds, Issue Solicitation and Purchase Order for One Vehicle
10. Appropriate Funds from the General Fund Undesignated (Unassigned) Fund Balance to Cover Unbudgeted Salary and Overtime Costs
11. Appropriate Funds from the General Fund Undesignated (Unassigned) Fund Balance to Cover Unbudgeted Salary and Overtime Costs
12. Amend Contract for Security Guard Services at Diamond Bar Headquarters
13. Appoint Regular and Alternate Public and Medical Members to South Coast AQMD Hearing Board for July 1, 2025 to June 30, 2028 Term
14. Approve Allocation as Approved by MSRC

Items 15 through 20 – Information Only/Receive and File

15. Legislative, Public Affairs and Media Report
16. Hearing Board Report
17. Civil Filings and Civil Penalties Report
18. Intergovernmental Review of Environmental Documents and CEQA Lead Agency Projects
19. Rule and Control Measure Forecast
20. Status Report on Major Ongoing and Upcoming Projects for Information Management

Items 21 through 26 – Reports for Committees, MSRC, and CARB

Note: The May 16, 2025 Mobile Source Committee meeting was cancelled. The next regular meeting of the Mobile Source Committee is June 20, 2025.

21. Administrative Committee
22. Legislative Committee
23. Stationary Source Committee
24. Technology Committee
25. Mobile Source Air Pollution Reduction Review Committee
26. California Air Resources Board Monthly Report
27. Items Deferred from Consent and Board Calendar
There were no items deferred.

Disclosures

Mayor Pro Tem McCallon and Supervisor Hagman reported that they had no financial interest in Agenda Item Nos. 3 and 14 but are required to identify for the record as being members of the Mobile Source Air Pollution Reduction Review Committee, which is involved in this item.

Supervisor Mitchell and Councilmember Raman reported that they had no financial interest in Agenda Item No. 5 but are required to identify for the record as being a Los Angeles County Board of Supervisor and Los Angeles City Councilmember, respectively, which are involved in this item.

Mayor Lock Dawson and Supervisor Perez reported that they had no financial interest in Agenda Item Nos. 3, 5, 11, and 14 but are required to identify for the record as being a CARB Board Member and former CARB Board Member, respectively, which is involved in this item.

Supervisor Nguyen announced that she was recusing herself from Agenda Item No. 2A because of a financial interest in Kinder Morgan Inc., which is materially affected by this item.



The public comment period was opened for Agenda Item Nos. 1 through 26 . The following individuals addressed the Board. For additional details, please refer to the [Webcast](#) beginning at 12:07.

Agenda Item No. 19 – Rule Forecast Report

Nathan Carbajal, East Yard Communities for Environmental Justice (EYCEJ)
Paola Vargas, EYCEJ and Carson resident
Saul Ventura, EYCEJ
Fernando Marquez-Duarte, University of California, Riverside PhD graduate
Keona Winkler, Riverside City College student and Highland resident
Marven Norman, Center for Community Action and Environmental Justice (CCA EJ)
and San Bernardino resident
Cristhian Tapia-Delgado, Pacific Environment and Long Beach resident
Joaquin Castillejos, CCA EJ and Inland Empire resident
Fernando Gaytan, Earthjustice
Jessie Parks. Riverside County resident
Theral Golden, West Long Beach Neighborhood Association
Tiff Sanchez, EYCEJ

The above speakers addressed concerns regarding the Port ISR. Key comments included:

- No further delays to rulemaking to reduce port-related air pollution;
- Urged for strengthening the Port ISR and for its adoption this year; and
- Emission reductions are needed to protect port adjacent and Inland Empire communities.

There being no further requests to speak, the public comment period was closed for Agenda Item Nos. 1 through 26.

Written Comments Regarding Agenda Item No. 3

-Regina Hsu and Adrian Martinez, Earthjustice

Written Comments Regarding Agenda Item No. 4

-One letter signed by the following organizations: Yasmine Agelidis, Earthjustice; Adriana Rizzo, Californians for Electric Rail; Taylor Thomas, East Yard Communities for Environmental Justice; Cristhian Tapia-Delgado, Pacific Environment; Andrea Vidaurre, People's Collective for Environmental Justice; Jennifer Maria Cardenas, Sierra Club; Ryan Calbreath, United Electrical, Radio, and Machine Workers of America

Written Comments Regarding Agenda No. 19 for PR 2304

-Norman Groot, Monterey County Farm Bureau

-One letter signed by the following organizations: Fernando Gaytan, Earthjustice; Christopher Chavez, Coalition for Clean Air; Paola Vargas, East Yard Communities for Environmental Justice; Sylvia Betancourt, Long Beach Alliance for Children with Asthma; Alison Hahm, Natural Resources Defense Council; Cristhian Tapia-Delgado, Pacific Environment; Andrea Vidaurre, People's Collective for Environmental Justice; Peter M. Warren, San Pedro & Peninsula Homeowners Coalition; Jennifer Maria Cardenas, Sierra Club; and Theral Golden, West Long Beach Association

Board Action (Items 1 – 26)

MOVED BY CACCIOTTI AND SECONDED BY HAGMAN TO APPROVE AGENDA ITEM NOS. 1 THROUGH 26 AS RECOMMENDED, INCLUDING TO ADOPT RESOLUTION NO. 25-9 RECOGNIZING FUNDS AND ACCEPTING GRANT FUNDS FROM THE CALIFORNIA ENERGY COMMISSION AND CALIFORNIA AIR RESOURCES BOARD JOINT ADVANCED TECHNOLOGY DEMONSTRATION AND PILOT PROJECTS PROGRAM; RECEIVE AND FILE THE COMMITTEE, MSRC, AND CARB REPORTS; AND APPROVE THE RECOMMENDATIONS ON LEGISLATION AS SET FORTH BELOW.

THE MOTION PASSED BY THE FOLLOWING VOTE:

AYES: Cacciotti, Delgado, Lock Dawson, Hagman, McCallon, Mitchell, Nguyen (except Item 2A), Olmos, Padilla-Campos, Perez, Raman, and Rodriguez
NOES: None
RECUSE: Nguyen (only Item No. 2A)

Legislation

AB 471 (Hart)- County air pollution control districts: Board members: compensation.

AB 1305 (Arambula)- Air pollution control and air quality management districts: permit information: internet website.

SB 526 (Menjivar)- South Coast Air Quality Management District: air quality.

Recommendation

Support

Oppose

Work With Author



CLOSED SESSION

The Board recessed into Closed Session at 9:25 a.m. to discuss the following items.

CONFERENCE WITH LEGAL COUNSEL – INITIATING LITIGATION, Pursuant to Government Code § 54956.9(a) and § 54956.9(d)(4) to consider initiation of litigation:

- Communities for a Better Arvin, et al., v. U.S. Environmental Protection Agency, et al., 9th Circuit Court of Appeals No. 24-7270 (amicus brief).

CONFERENCE WITH LEGAL COUNSEL – ANTICIPATED LITIGATION, Pursuant to Government Code § 54956.9(d)(2), to confer with legal counsel because there is significant exposure to litigation against the South Coast AQMD:

- June 5, 2025 Letter From United States Attorney Bilal A. Essayli.

RECONVENE INTO OPEN SESSION

The Board reconvened to Open Session at 9:50 a.m. with all Board members present.

CLOSED SESSION REPORT

Chief Deputy Counsel Barbara Baird announced that a report of any reportable actions taken in Closed Session will be filed with the Clerk of the Boards.

PUBLIC HEARINGS

29. Determine that Proposed Amended Rule 1171 – Solvent Cleaning Operations, Is Exempt from CEQA; and Amend Rule 1171

Mike Krause, Assistant Deputy Executive Officer/Planning, Rule Development and Implementation, gave the staff presentation on Agenda Item No. 29. For additional details, please refer to the [Webcast](#) beginning at 53:19.

The public comment period was opened for Agenda Item No. 29 and the following individuals addressed the Board.

Doug Raymond, Raymond Regulatory Resources (3R) and Nicholas George, Household and Commercial Products Association, thanked staff for working with their organizations to address issues. They applauded staff for providing a Maximum Incremental Reactivity (MIR) alternative limit in PAR 1171 and requested that its use be allowed in Rule 1143 - Consumer Paint Thinners & Multi-Purpose Solvents. For additional details, please refer to the [Webcast](#) beginning at 59:58.

Cindy Parsons, Los Angeles Department of Water and Power*
Kirsten Melville, Metropolitan Water District

Expressed support for the usage limits in PAR 1171 and the alternative compliance option that will allow the limited use of liquid alcohol cleaning materials for specific equipment used at electricity and water distribution facilities. For additional details, please refer to the [Webcast](#) beginning at 1:02:30 and 1:06:15. *(Submitted Written Testimony)

Mr. Krause commented that the MIR equivalency will be taken into consideration during future rulemakings for Rule 1143 and other rules. For additional details, please refer to the [Webcast](#) beginning at 1:03:40.

Bill Quinn, California Council for Environmental & Economic Balance, expressed support for the proposal and appreciation to staff for addressing technical issues for the electrical and water utilities. For additional details, please refer to the [Webcast](#) beginning at 1:05:32.

Gary Jones, Printing United Alliance, expressed support for the changes in PAR 1171 and complimented staff for working with the printing industry on their unique cleaning needs and allowing alternative reactivity-based limits. For additional details, please refer to the [Webcast](#) beginning at 1:07:02.

Mike Lewis, Construction Industry Air Quality Coalition, expressed concern regarding the reduced limits on the use of aerosol solvents and commented on the importance of having effective solvents for cleaning parts and equipment in the construction industry to ensure proper operation. He requested confirmation regarding emissions and recordkeeping requirements for coatings with VOC levels less than 50 g/L and asked that staff report back in a year to assess usage limits and compliant products. For additional details, please refer to the [Webcast](#) beginning at 1:07:58.

Harvey Eder, Public Solar Power Coalition, expressed concerns with items being exempt from CEQA and commented on the importance of equitable access to solar energy. For additional details, please refer to the [Webcast](#) beginning at 1:09:24.

There being no further requests to speak, the public comment period was closed for Agenda Item No 29.

Board Action (Item 29)

MOVED BY HAGMAN AND SECONDED BY CACCIOTTI TO APPROVE AGENDA ITEM NO. 29 AS RECOMMENDED AND ADOPT RESOLUTION NO. 25-10:

- 1) DETERMINING THAT PROPOSED AMENDED RULE 1171 – SOLVENT CLEANING OPERATIONS, IS EXEMPT FROM THE REQUIREMENTS OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT; AND
- 2) AMENDING RULE 1171 – SOLVENT CLEANING OPERATIONS

THE MOTION PASSED BY THE FOLLOWING VOTE:

AYES: Cacciotti, Delgado, Lock Dawson, Hagman, McCallon, Mitchell, Nguyen, Olmos, Padilla-Campos, Perez, Raman, and Rodriguez

NOES: None



28. Certify Final Subsequent Environmental Assessment for Proposed Amended Rule 1111– Reduction of NOx Emissions from Natural Gas-Fired Furnaces and Proposed Amended Rule 1121 – Reduction of NOx Emissions from Residential Type, Natural Gas-Fired Water Heaters; and Amend Rule 1111 and Rule 1121

Mike Krause gave the staff presentation on Agenda Item No. 28. For additional details, please refer to the Webcast beginning at 1:11:43.

Chair Delgado thanked the over 200 public commenters for their participation in the hearing and acknowledged the complexity of PARs 1111 & 1121. She expressed her continued support for the rules and emphasized that all board members are working in good faith to improve air quality while considering various concerns.

The public comment period was opened for Agenda Item No. 28 and the following individuals addressed the Board. For additional details, please refer to the [Webcast](#) beginning at 1:34:05.

Mayor Bill Hussey, City of Grand Terrace
Councilmember Peggy Huang, City of Yorba Linda
John Gabbard, Orange County Council of Governments
Jamey Federico, Association of California Cities – Orange County
Mayor Pro Tem Curtis Burton, City of Chino

Mayor Pro Tem Bob Karwin, City of Menifee
Councilmember Jorge Herrera Avila, City of San Gabriel
Brian Johsz, BizFed Los Angeles
Pablo Genslinger
Kevin Barker, SoCal Gas
Antoinette Del Peral
Kory Griggs, Indoor Weather Inc.
Irene Terim Lee
Sam Iguchi, Cost of Living Council
Michael Corbett, Bradford White Corporation
Dr. Ruben Guerra, Latin Business Association
Paulina Alvarez, Orange County Business Council
Ani Boyadijan, Central City Association
Randall Oshiro, Noritz America Corporation
Audree Garaza, Inland Gateway Association of Realtors
Paul Herrera, California Dessert Association of Realtors, Inland Gateway Association of
Realtors, Inland Valley Association of Realtors
Yvonne Leonard, Inland Valley Association of Realtors
Amanda Quintanilla
Matthew Lyons, San Gabriel Valley Economic Partnership
Mary Caldwell
Brent Bechtel, Inland Valley Association of Realtors
Robert Helbing
Joseph Edward
Michael Cormode, Utility Workers Union of America, Local 132
William Gilbertson, Utility Workers Union of America, Local 132
Nick Calero, On behalf of Senator Rosilicie Ochoa-Bogh
Michael Quintanilla
Tanya, Brea Chamber of Commerce
Peggi Hazlett, Greater Ontario Business Council
Sharon Butler, Tri County Association of Realtors
Helen Jeong, Southwest Riverside County Association of Realtors
Josephine Taylor, Tri County Association of Realtors
Danita Beauchamp, La Verne Coalition of Concerned Citizens
Chip Ahlswede, On behalf of Senator Tony Strickland
Collin Powers, Orange County Association of Realtors
Steven Figueroa
Shideh Ghandeharizadeh
Matt Larson
Brian De Franco, On behalf of Assemblymember Laurie Davies
Dr. Robert Sausedo, Community Build
Jackie Romero, California Restaurant Association
Cynthia Gabaldon
Julie Markarian, Apartment Owners Association of California
Derrick Gaffney, Jamboree Housing Corporation
Donna Dolan
Michele Schuetz, On behalf of Assemblymember Tri Ta
Victor Hernandez, Assemblywoman Leticia Castillo
W.O.O.
Nicole Colantonio, Air-Condition, Heating and Refrigeration Institute

Laura Smith
Caren Spilsbury, Norwalk Chamber of Commerce
Ann Mallery
Alex Ayers, Hardy
Mayor Tim Hepburn, City of La Verne
Sterling Scott, Boys Republic
John Sisley
Paul Taylor
Gus Torres
Sean Obrien
Dan Farrar
Andrew In, Care Clinic
Alexander Kim, Asian Business Association of Orange County
Gary Flor
Ric
Ken Coate, Inland Action
Mitch Bailey, Institute of Heating and Air Conditioning Industries
Craig Snow
John Kinney
Justin Walters, Plumbers Local 78
Mark Markarian
Matt Lattanzi, Rheem Manufacturing Company
Veto Basulto, Anchored Church of Downtown Los Angeles
Sean Johnson
Robert Hufnagel, Rancho Cucamonga Chamber of Commerce
Zachary Strasters, CREED LA
Amy Smith, CREED LA
Carlos Ruiz
Jasmine
Christ Forth
Clint Olivier, Central Valley Business Federation
Cooper Strull, On behalf of Assemblymember Diane Dixon
Robert Glass, Viking Comfort Technologies
Felix Palma
Audrey Egger, Inland Empire Economic Partnership
Vic Markarian
Tomas Ursua
Mike Prencavage, Plumbing-Heating-Cooling Contractors Association of Orange,
Riverside and San Bernardino Counties
Roy Bleckert
Mikayla Gibson, Valley Industry and Commerce Association
Cynda
Walter
Deidre Taylor
Eduardo
David Hanson, Local 398
Leah Skinner, Carson Chamber of Commerce
Victor Cao, California Apartment Association
Joe Boros, Rheem Manufacturing Company
Adriana Calderon

Eric Hanson, Upland Chamber of Commerce
Mergie Tabrizi, API Property Management

The above speakers conveyed their opposition to PAR 1111 & PAR 1121. Key comments included:

- Expressed concerns with affordability, lack of consumer choice, compliant product availability, electricity demand and grid readiness, and the mitigation fee structure;
 - Creates an uneven regulatory framework in relation to other South Coast AQMD rules that cover similar products;
 - Questioned the cost analysis, and projected health and economic benefits;
 - More time needed to address concerns with the alternative compliance options;
 - No guarantee the rules will result in SIP credit;
 - Preempted by federal law, per U.S. Attorney's Office;
 - Balanced approach needed that considers the financial impact; and
 - Urged for delay of PARs 1111 & 1121
-

Councilmember Juan Muñoz-Guevara, City of Lynwood
Thomas Castro, Climate Action Campaign
Gayatri Sehgal
Aura Vasquez
Fernando Gayton, Earthjustice
Pete Marsh, Long Beach US Green Building Council
Anthony Campos, Sheet Metal, Air, Rail and Transportation Workers (SMART) Local Union 105
David Martinez, Climate Action Campaign
Morris Rocha, SMART Local 105
Dan Kegel
Tom Hazelleaf
Jed Holtzman, RMI
Angie Flores, SMART Local 105
Antonito Torres
Dylan Plummer, Sierra Club
Richard Chaou, SMART Local 105
Stanley Shaw, Earthjustice
Andrea Vidaurre,
Alex Calderon
Jennifer Cardenas
Al Sattler
Luz Perez
Dalinef De Leon
Sara Gersen
Daniella Torres
Marie Helene Luebbbers
Chris Chavez, Coalition for Clean Air
Angel Teo

Leli Rodriguez (via Spanish interpreter)
Morrey
Leeza Bondarchuk, Sunrise Movement Orange County Hub
Frank Granda
Morgan Goodwin, Sierra Club
Raquel Aguilar
Araceli Reyes (via Spanish interpreter)
Dominic Bendeinelli
Margee Hills
Edilberto Torres (via Spanish interpreter)
Aracely Lopez
Kim Orbe, Sierra Club
Azarely Bedolla
Alejandra Ruiz, The Coalition for Human Immigrant Rights of Los Angeles (CHIRLA)
Jessie Parks
Michael Rochmes, US Green Building Council
Paulina Ochoa
Vladimir Carrasco, CHIRLA
Mary Ann
Fernando Ochoa, SMART Local 105
Benjamin Quesada, SMART Local 105
Paolina Ochoa
Perry McGuire
Angela Bai
John Spock
MaCarmen Gonzalez (via Spanish interpreter)
Aurora Pineda, CHIRLA (via Spanish interpreter)
Ana Miriam Castro (via Spanish interpreter)
Albert Orosco, SMART Local 105
Cynthia Herrera, Green and Healthy Homes Initiative
Ulysses Mora, On behalf of Assemblymember Robert Garcia
Priscilla Torres
Gary Tavetian
Ana Gonzalez, CCAJ
David Marrett,
Rosa Gonzalez
Vilaney Ortiz (via Spanish interpreter)
Grace Lim-Hayes
Polish Mukerjee, Coalition for Clean Air
Veronica Perez
Fernando Marquez Duarte
Xavier Nunez-Sundara, College Democrats in Orange County
Andrew Reich
Abigail Odoul
Loraine Enriquez
Sam Brown
Bryan Matsumoto
Mandeera Wijetunga
Monica
Deshawn Samad, Rebuild LA Safe Coalition

Catalina Gonzalez
Joaquin Castillejos
Srinidhi
Brittany Rivas, Communities for a Better Environment
Patty Glick
Ann Pernick, Safe Cities
Laura Gracia, Communities for a Better Environment
Gracyna Mohabir, California Environmental Voters
Ernesto Villasenor, American Lung Association
Adriana Martinez, Communities for a Better Environment
Kayla Asato, Orange County Environmental Justice
Darrell Clark, Sierra Club
Casey Gallagher, Sunrise Orange County
Susie Harris, US Green Building Council California
Alex Beltran, San Bernardino resident

The above speakers expressed their support for PAR 1111 & PAR 1121. Key comments included:

- Needed to reduce NOx emissions to meet air quality standards and protect public health;
 - Higher mitigation fees needed for GO ZERO;
 - Commented on misinformation/claims made about the rules;
 - Creates jobs and brings net economic benefits to the region;
 - Encourages manufacturers to accelerate transition to zero-emissions equipment and fund incentives;
 - Addresses the transition to zero-emission appliances and reducing emissions to protect port adjacent and Inland Empire communities; and
 - Urged for adoption of PARs 1111 & 1121 and to strengthen where possible.
-

Bill LaMarr, California Small Business Alliance, expressed concern that the current versions of PARs 1111 & 1121 lack meaningful emission reduction targets and offer meaningless cost-effectiveness projections. He urged the Board to reject the proposals and direct staff to start over. For additional details, please refer to the [Webcast](#) beginning at 4:08:22.

There being no further requests to speak, the public comment period was closed for Agenda Item No 28.

Written Comments Submitted Regarding PARs 1111 & 1121
(See Attachment A)

The Board took a brief lunch break at 12:31 p.m. and reconvened at 12:43 p.m.



Executive Officer Nastri acknowledged the range of comments made and the tough decision facing the Board. He commended the technical competence of staff and expressed confidence in the staff's accuracy, thoroughness, and expertise. For additional details, please refer to the [Webcast](#) beginning at 4:51:44.

Supervisor Nguyen affirmed her support for clean air but expressed opposition to PARs 1111 & 1121. She highlighted key concerns with the proposed rules and described as an unaffordable, unreliable, and unlawful mandate imposed without the necessary systems and infrastructure in place. She urged her fellow Board Members to vote "no" on the proposed rules. For additional details, please refer to the [Webcast](#) beginning at 1:34:05. 4:53:13.

Vice Mayor Olmos emphasized the need to serve and protect communities and her support for clean air goals. She highlighted affordable housing as a key local challenge and described the current proposals as unaffordable for many and suggested a more balanced approach solution such as voluntary incentive programs for consumers to adopt zero-emission appliances. Vice Mayor Olmos expressed her intent to register a "no" vote on the proposed rules. For additional details, please refer to the [Webcast](#) beginning at 1:34:05. 4:58:45.

Supervisor Mitchell commended staff for their outreach efforts and commented on the significant NOx emission reductions PARs 1111 & 1121 are projected to achieve. She acknowledged concerns about housing costs but pointed out that the increasing healthcare costs will be a greater burden for all communities. Supervisor Mitchell thanked the various stakeholders for sharing their concerns but noted the importance of making tough policy decisions for the greater good and the need for the Board to take action. She described the proposals as a fair compromise and affirmed that her support for the rules is in the best interest of public health and to meet federal clean air standards. For additional details, please refer to the [Webcast](#) beginning at 5:00:22.

Mayor Lock Dawson acknowledged the significance of the decision before the Board, thanked the Stationary Source Committee for their work, and noted that feedback on PARs 1111 & 1121 came largely from constituents. She commented on the Board's core responsibility to improve air quality and acknowledged the need to reduce NOx emissions, meet federal attainment standards, and address emissions associated with gas appliances. However, she was reluctant to support the proposals due to concerns over their timing and economic impact on consumers who are already experiencing financial strain. Mayor Lock Dawson voiced support for encouraging market-based solutions instead. For additional details, please refer to the [Webcast](#) beginning at 5:07:19.

In response to Mayor Lock Dawson's inquiry regarding the replacement costs of space heaters and water heaters, Executive Officer Nastri provided information on the cost of heat pumps and emphasized that when a space heater and air conditioner are being replaced with a heat pump, the costs are generally the same, and that the proposed rules allow homeowners to continue to purchase gas units. For additional details, please refer to the [Webcast](#) beginning at 5:13:05.

Mayor Pro Tem McCallon explained that the Stationary Source Committee tried to come up with a market-based solution that would be broadly acceptable but cost and affordability remained significant concerns. He acknowledged the urgency to address public health but expressed concerns about the current economic uncertainties, suggesting that this may not be the right time for added burdens on consumers given current economic hardships. For additional details, please refer to the [Webcast](#) beginning at 5:15:52.

Councilmember Raman expressed appreciation for the valuable feedback throughout the rulemaking process, highlighted the insights from Board Members, and thanked the Chair and staff for advancing the proposed rules. She described the proposed amendments as a balanced compromise that addresses many of the initial concerns and is a gradual rollout with more time built into their structure. She emphasized the Board's responsibility to reduce emissions and urged her fellow Board Members to approve the rules with a commitment to revisit if economic uncertainty persists, noting their potential to significantly advance the Board's clean air mission and to be one of the most impactful rulemakings during her tenure on the Board. For additional details, please refer to the [Webcast](#) beginning at 5:17:36.

Supervisor Hagman thanked everyone for their participation and staff for the significant evolution of the rules over the past two years. He expressed concerns about government overreach, cost assumptions, and the difficulties of implementing the rules across San Bernardino County's diverse geographic regions, particularly given the unique challenges some constituents in certain areas face. He highlighted infrastructure limitations and grid reliability as major concerns, questioned the benefits of partial electrification, and raised issues around affordability and costs. Supervisor Hagman voiced his opposition to the rules. For additional details, please refer to the [Webcast](#) beginning at 5:21:52.

Board Member Padilla-Campos thanked community members for their engagement in the PARs 1111 & 1121 rulemaking process and commended staff for their extensive outreach and responsiveness to public input. She noted that everyone she spoke to supports the rules and rely on the Board to advocate for their health. Although she preferred the original, stronger version of the proposed rules, she described the current proposals as an important step in achieving attainment in the South Coast region and having life-saving potential, especially for vulnerable communities. Board Member Padilla-Campos acknowledged the financial hardships the rules may pose but emphasized that today's vote is about protecting public health. She expressed her strong support for the rules and urged her fellow Board Members to do the same. For additional details, please refer to the [Webcast](#) beginning at 5:25:58.

Mayor Pro Tem McCallon thanked his fellow Board Members for their comments and remarks. He also expressed appreciation for the wide range of public participation in the rulemaking process, highlighting the value of hearing diverse perspectives. For additional details, please refer to the [Webcast](#) beginning at 5:30:08.

Mayor Pro Tem Rodriguez thanked his fellow Board Members and staff for their hard work and outreach efforts, and the community for their engagement. He expressed opposition to PARs 1111 & 1121 and requested that his colleagues take the same position, highlighting concerns with the undue financial burdens being imposed on low-income residents, seniors, and working-class families, the proposed mitigation fee for manufacturers, and grid reliability. Mayor Pro Tem Rodriguez commented on the widespread opposition to the rules from the vast majority of Orange County cities, the Orange County Council of Governments, the Association of California Cities Orange County, and numerous stakeholders. For additional details, please refer to the [Webcast](#) beginning at 5:31:07.

Supervisor Perez thanked his fellow Board Members for sharing their points of view and staff for their extensive outreach efforts. He expressed concerns with the electric grid capacity and inadequate infrastructure that impacts his constituents in Riverside County and commented on pending legislation aimed at addressing electricity costs and clean energy infrastructure development. Supervisor Perez expressed his opposition to PARs 1111 & 1121, noting that most of the policymakers in the cities he represents are also opposed to the proposed rules. For additional details, please refer to the [Webcast](#) beginning at 5:41:36.

Vice Chair Cacciotti expressed appreciation for the work on PARs 1111 & 1121 and acknowledged that many of the cities he represents oppose the proposed rules. He expressed his support for the proposals, citing the gradual transition, consumer choice, planned technology review, and projected environmental, health, economic, and job benefits. Recognizing that there may not be sufficient votes to approve the current proposals, Vice Chair Cacciotti requested that staff provide an explanation of Alternative C—the less stringent option analyzed in the CEQA document. He inquired whether the Board could consider this alternative as a potential option. For additional details, please refer to the [Webcast](#) beginning at 5:49:25.

Mr. Krause explained that the less stringent approach under Alternative C introduces a mixed approach for existing buildings for 50 percent of affected equipment to be replaced with zero-NOx emission technologies and the other 50 percent to be replaced with low-NOx equipment. For additional details, please refer to the [Webcast](#) beginning at 5:56:00.

Vice Chair Cacciotti asked if the implementation phases could be adjusted for the alternative compliance option to accommodate a more gradual transition and more time for the grid infrastructure advancement. For additional details, please refer to the [Webcast](#) beginning at 5:56:50.

Chief Deputy Counsel Barbara Baird explained that if the specified compliance effective dates were delayed, it could be argued that the change falls outside the scope of the CEQA document. For additional details, please refer to the [Webcast](#) beginning at 5:57:23.

Supervisor Mitchell emphasized the importance of not presupposing the outcome of the vote and the need to hold a vote on the staff recommendations first and then determine next steps based on the outcome. She questioned the appropriateness of the Board making changes to the staff proposals at the public hearing. For additional details, please refer to the [Webcast](#) beginning at 5:58:16.

Vice Chair Cacciotti requested that staff clarify the operational process for the Board to consider an alternative option, if the vote to approve the staff recommendations fails. For additional details, please refer to the [Webcast](#) beginning at 6:00:04.

General Counsel Gilchrist explained that if the vote fails, a motion to reconsider could be made by a Board Member on the prevailing side of the original vote, with a second required to proceed. Alternatively, the Board could refer the matter back to committee. For additional details, please refer to the [Webcast](#) beginning at 6:00:26.

Chair Delgado asked whether the Board could consider alternative proposals. General Counsel Gilchrist confirmed that the Board could consider any of the alternative proposals analyzed in the CEQA document. For additional details, please refer to the [Webcast](#) beginning at 6:00:55.

Chair Delgado expressed doubt that the current proposal would pass and sought to determine whether the Board could feasibly come to an agreement on an amended version of PARs 1111 & 1121 at today's meeting. She commented on the difficulty in continuing the proposals, given their time-sensitive nature and that staff resources are already committed to other matters such as the Port ISR. For additional details, please refer to the [Webcast](#) beginning at 6:01:12.

Supervisor Hagman cautioned against engaging in policy debates during a public meeting. He recommended proceeding with a vote on the staff recommendations and noted that the appropriate course of action would be for the Board to either propose an alternative motion or refer the item back to committee should the motion fail. For additional details, please refer to the [Webcast](#) beginning at 6:02:06.



Board Action (Item 28)

MOVED BY MITCHELL AND SECONDED BY RAMAN
TO APPROVE AGENDA ITEM NO. 28 AS
RECOMMENDED AND ADOPT THE RESOLUTION:

- 1) CERTIFYING THE FINAL SUBSEQUENT ENVIRONMENTAL ASSESSMENT FOR PROPOSED AMENDED RULE 1111 – REDUCTION OF NOX EMISSIONS FROM NATURAL GAS-FIRED FURNACES, AND PROPOSED AMENDED RULE 1121 – REDUCTION OF NOX EMISSIONS FROM

RESIDENTIAL TYPE, NATURAL GAS-FIRED WATER HEATERS; AND

- 2) AMENDING RULE 1111 – REDUCTION OF NOX EMISSIONS FROM NATURAL GAS-FIRED FURNACES, AND RULE 1121 – REDUCTION OF NOX EMISSIONS FROM RESIDENTIAL TYPE, NATURAL GAS-FIRED WATER HEATERS.

THE MOTION FAILED FOR A LACK OF SEVEN CONCURRING VOTES AS FOLLOWS:

AYES: Cacciotti, Delgado, Mitchell, Padilla-Campos, and Raman

NOES: Lock Dawson, Hagman, McCallon, Olmos, Nguyen, Perez, and Rodriguez



(Supervisor Perez left the meeting at 3:00 p.m.)

The Chair called for alternative motions and Supervisor Hagman made a motion to refer PARs 1111 & 1121 back to the Stationary Source Committee where the alternative options could be properly vetted and deliberated. Mayor Lock Dawson seconded the motion. For additional details, please refer to the [Webcast](#) beginning at 6:03:20.

Vice Chair Cacciotti clarified that the alternative options were contained in the CEQA document and therefore, the Board as well as the public has had the opportunity to vet those options. For additional details, please refer to the [Webcast](#) beginning at 6:03:32.

Mayor Pro Tem Rodriguez opposed sending the matter back to committee, noting the significant time already spent on this item and that the Board made its decision today. He suggested that the Board shift focus to other items on its policy agenda. For additional details, please refer to the [Webcast](#) beginning at 6:04:21.

MOVED BY HAGMAN AND SECONDED BY LOCK DAWSON TO REFER AGENDA ITEM NO. 28 BACK TO THE STATIONARY SOURCE COMMITTEE.

THE MOTION PASSED BY THE FOLLOWING VOTE:

AYES: Cacciotti, Delgado, Lock Dawson, Mitchell, Olmos, Padilla-Campos, and Raman

NOES: Hagman, McCallon, Nguyen, and Rodriguez

ABSENT: Perez

Chair Delgado clarified that this item would probably not be coming back before the Board in 2025.

(Supervisor Mitchell and Councilmember Raman left the meeting at 3:04 p.m.)



PUBLIC COMMENT PERIOD – (Public Comment on Non-Agenda Items, Pursuant to Government Code Section 54954.3)

The Public Comment Period on Non-Agenda Items was opened. The following individuals addressed the Board.

Chris Chavez, Coalition for Clean Air, expressed disappointment with the Board's decision on PARs 1111 & 1121, noting that the Health and Safety Code mandates the implementation of all feasible measures to reduce NOx pollution. He also cautioned that failure to mandate emission reductions at the ports could trigger a federal implementation plan and federal sanctions. For additional details, please refer to the [Webcast](#) beginning at 6:07:39.

A member of the public reported two instances of hazardous chemical spills involving hydrated lime. Chair Delgado directed staff to reach out to the speaker. For additional details, please refer to the [Webcast](#) beginning at 6:09:01.

Matthew Cosylion, a member of the public, expressed concerns regarding public access to the meeting and emphasized the need to ensure online participants have an opportunity to be heard. He commented on the importance of protecting the middle class in policymaking and thanked the Board for its action on PARs 1111 & 1121. He recommended improving communication and outreach, noting that he only became aware of today's meeting a few days ago and was not among those reportedly notified. For additional details, please refer to the [Webcast](#) beginning at 6:10:59.

Kristin Schultz, a member of the public, echoed the concerns of the previous speaker regarding public access and giving online participants the opportunity to speak. She urged the Board to prioritize outreach, particularly to small business owners who are directly impacted by regulations and want to be part of the process. For additional details, please refer to the [Webcast](#) beginning at 6:12:10.

Brad Anderson, a member of the public, expressed agreement with the previous two speakers. He expressed concern that he had been waiting online before 9:00 a.m. but was never called to speak on Agenda Item No. 28, noting that this may constitute a violation of California state law regarding public meetings. For additional details, please refer to the [Webcast](#) beginning at 6:13:15.

Sean O'Brien, a member of the public, expressed concerns about procedural issues during the public hearing on PARs 1111 & 1121 and potential Brown Act violations, noting that the Board should not listen to public comments and then engage in last-minute negotiations or adjustments to sway votes. For additional details, please refer to the [Webcast](#) beginning at 6:14:06.

There being no further requests to speak, the Public Comment Period on Non-Agenda Items was closed.



Written Comments Regarding Recent Amendments to Rule 1146.2

Senator Tony Strickland, 36th Senate District, California State Senate



General Counsel. Gilchrist read the following into the record regarding a correction to Agenda Item No. 1 (May 2, 2025 Meeting Minutes): the Board's vote on page 8 for Agenda Items No. 1-24 was corrected by adding Mayor Lock Dawson and deleting Supervisor Hagman from the Ayes vote. There were no objections to the correction being made.



ADJOURNMENT

There being no further business, Chair Delgado adjourned the meeting at 3:14 p.m.

The foregoing is a true statement of the proceedings held by the South Coast Air Quality Management District Board on June 6, 2025.

Respectfully Submitted,

Faye Thomas
Clerk of the Boards

Date Minutes Approved: _____

Vanessa Delgado, Chair

Attachment A – PAR 1111 & PAR 1121 Written Comments Submitted

ACRONYMS

- CARB = California Air Resources Board
- CEQA = California Environmental Quality Act
- FY = Fiscal Year
- g/L = Gram Per Liter
- ISR = Indirect Source Rule
- MSRC = Mobile Source Air Pollution Reduction Review Committee
- PAR = Proposed Amended Rule

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

GENERAL COMMENTS/STATEMENTS

- Mike Corbet, Bradford White Corporation
- Marisa Creter, San Gabriel Valley Council of Governments
- Mayor Ron deHarte, City of Palm Springs
- Earl De Vries, Ontario resident
- United States Attorney Bilal Essayli, United States Attorney's Office Central District of California
- Mayor Shelly Hasselbrink, City of Los Alamitos
- Thomas Hiltachk, Bell, McAndrews & Hiltachk, LLP
- Mayor Nicol Jones, City of Villa Park
- Mayor Matthew Pagano, City of Dana Point
- James Phillips, Rheem Manufacturing Company
- Mayor David Shawver, City of Stanton
- Mayor Cindy Warren, City Murrieta

WRITTEN TESTIMONY

- Nicole Colantonio, Air-Conditioning, Heating, & Refrigeration Institute

COMMENTS OPPOSING PAR 1111 AND PAR 1121

- Resolution No. 8343, City of Rialto

- Mayor Valerie Amezcua and City Manager Alvaro Nuñez, City of Santa Ana
- Mayor Baca, City of Rialto
- Mayor Pat Burns, City of Huntington Beach
- Victor Cao, California Apartment Association
- Councilmember Craig Corman, City of Beverly Hills
- Jamey Federico, Association of California Cities - Orange County & Councilmember, City of Dana Point
- Patrick Gallegos, Interim City Manager, City of Seal Beach
- Julie Michaels, Inland Action
- Ed Molina, Orange County Realtors
- Mayor Frank Navarro, City of Colton
- Marnie O'Brien Primmer, Orange County Council of Governments
- Jackie Romero, California Restaurant Association
- Councilmember Jimmy Saldana, City of Highland
- Mayor Michael Vargas, City of Perris
- Mayor Mark Waldman, City of La Palma
- One letter signed by the following members of the California State Assembly and Senate::
Assemblymember Laurie Davies, AD 74; Assemblymember Diane Dixon, AD 72;
Assemblymember Jeff Gonzalez, AD 36; Assemblymember Tri Ta, AD 70; Assemblymember James Gallagher, AD 3; Assemblymember Sharon Quirk-Silva, AD 67; Assemblymember Tom Lackey, AD 34; Assemblymember Greg Wallis; AD 47; Assemblymember Leticia Castillo, AD 58; Assemblymember Kate Sanchez, AD 71; Assemblymember Phil Chen, AD 59; Assemblymember Stan Ellis, AD 32; Senator Tony Strickland, SD 39; Senator Steven Choi, SD 37; and Senator Kelly Seyarto, SD 32

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

COMMENTS OPPOSING PAR 1111 AND PAR 1121 (Continued)

007 mfred*****

Aaliya Pacheco – Lakeview Terrace
Adam Walch – Rancho Palos Verdes
Adriana Taggart
Aileen Jimenez – Lakeview Terrace
Al W – San Dimas
Alan and Tom Kaczmarek
Alan Grange
Albert Medina
Alfredo Torres
Alice Gu
Alison Vargas, Lakeview Terrace
Allen Inlow – Glendora
Andrea Yutadco – Lakeview Terrace
Andrew Espinoza – Los Angeles
Andrew Luviano – Lakeview Terrace
Ann Busch
Anna M. Cummins
Anne Heston
Anne Heston
Anthony Bober
Anthony Carniglia – Hemet
Anthony Rafael – Lakeview Terrace
Anthony Romero – Lakeview Terrace
Anthony Villa – Santa Ana
Anthony Zamora
Antonia C. Hayes
April Bourgeois
Arghavan Rashidifard
Arnold Winer – Alta Loma
Ashley B
Ashley Kavanagh
Audrey Becerra – Lakeview Terrace
Audrey Streb
Barbara Garcia
Becky Brown – Murrieta
Ben Price
Beth Tirado – Pasadena
Betsabe Salmeron – Lakeview Terrace
Bill A.
Bill Bisaha
Bob Blaisdell
Bobby Gillespie
Bonnie Nardulli
Brad Freeman - Westminster
Brad Miller – Mission Viejo
Brandon Garcia – Lakeview Terrace
Brian Galway

Brian Sheil
Brianna Aragon – Lakeview Terrace
Brooks Joe
Bruce Baumann
Bryan Bergsteinsson
C. Turner
Camelia Vera
Cari Ferrell – Glendora
Carl Ehmann
Carmen Rawson, Newport Beach
Carlos Urena
Carol Houghton – Chino
Carol Ingrassi
Carolu Every - Glendora
Carolyn Hanlin – Santa Monica
Cat Phelps
Catherine Koperek
Cathy and Larry Goodson
Cathy Cushman
Cathy Taylor
Charles O'Connell
Cheryl Ramirez
Cheryl Valencia – San Bernardino
Chris Brosz
Christopher Laasch
Cindy Warren, Mayor, City of Murrieta
Clementina Esuivel – Rialto
Colleen Clark
Colleen Nelson – North Tustin
Connie Silva
Crag Talbot
Craig Holmes
Craig Talbot
Cristal Barron – Lakeview Terrace
D. Gee – Palmdale
D. Pitt
Dan Torres
Daniel Hanson – Glendora
Danielle Evans
Danna Palma – Lakeview Terrace
Danyal Shahid – Lakeview Terrace
Darcie Cancino – Santa Ana
Darren Southard
Dashun Nelson – Lakeview Terrace
Dave
Dave Cassidy
Dave Madsen

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

COMMENTS OPPOSING PAR 1111 AND PAR 1121 (Continued)

| | |
|--|-------------------------------------|
| Dave Robertson | Georgia Danenhauer |
| David Asman | Gerald Ridout |
| David Glick | Gloria Broderick |
| David S. Watkins | Gloria Marecek |
| David Wislocki | Grace Turi |
| Dawn Noorda-Boldrin – Lakeview Terrace | Greg Stonebraker |
| Daysi Sandoval – Lakeview Terrace | Gregory Brittain |
| Dean Sonnenberg - Camarillo | Gretchen Murray |
| Debbie Dunn Boysen | Harold Nelms |
| Deborah Wimmer | Haydee Andujo |
| Debra Brown, Bowers Properties, Inc. | Heather Knoedler – Thousand Oaks |
| Del Andreini | Heather McKenzie – Glendora |
| Demar Gonzalez – Huntington Beach | Hilario Davila – Lakeview Terrace |
| Denise Parker | Iliany Vazquez – Lakeview Terrace |
| Diane Hassey | Ivan Barreto – Lakeview Terrace |
| Diane Keel | Jack Beadle – Anaheim |
| Dona Evans | Jack O’Neil |
| Dorothy Phillips – Upland | Jairo Pineda – Lakeview Terrace |
| Doug Brown | James Buysse |
| Douglas Bauder | James Enstrom |
| Eddie Textor | James Gick |
| Edmond Burzycki – Running Springs | James Le Berthon |
| Edward Stoll | James Vita |
| Edwin Huerta – Lakeview Terrace | Jamie Shaver – Corona |
| Elena Solis – Lakeview Terrace | Jane Noltensmeier |
| Elizabeth Jouvenant – San Dimas | Janet Gray |
| Elizabeth Vozzella | Janet Mueller – Mission Viejo |
| Ellen Hanson | Jason C |
| Ellie Hutton | Jason Enright – North Hollywood |
| Emily Valles – Lakeview Terrace | Jason H |
| Eric Zanteson | Jay Richmond |
| Erik Schick | Jazlyn Robles – Lakeview Terrace |
| Erin Stone – West Hills | Jeff |
| Esabella Villanueva – Lakeview Terrace | Jeff Bunn |
| Evan Quintero – Lakeview Terrace | Jeff Perry |
| Eve Mekerdichian- Glendale | Jeff Rocci |
| Fabiola Hernandez – Lakeview Terrace | Jeffrey M |
| Fernando Rico – Orange | Jeffy B. Killian – Bloomington |
| Frank Conn – Woodland Hills | Jelenny Esquivel – Lakeview Terrace |
| Frank Skocilich – Canoga Parts | Jennifer Elkins – Val Verde |
| Franki Torres | Jennifer True |
| Garrett Francis | Jennine Barrett |
| Garrett Woodside - Upland | Jeremy Laughlin – Tustin |
| Garritt Deyoung | Jerry Poupard |
| Gary and Nan Hogan – Fullerton | Jesse Rojas |
| Gary Marston, San Diego | Jill Ashlock – Orange County |
| Genevieve Fakoory – Sierra Madre | Jill Safranek |
| George Braunegg | Jill-Ellen Mauser |

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

COMMENTS OPPOSING PAR 1111 AND PAR 1121 (Continued)

| | |
|-------------------------------------|---|
| Jim G | Kate Worden – Azusa |
| Jim Reynoso | Katheryn Conn – Woodland Hills |
| Joan Brandt | Kathleen Frick |
| Joan Davidson – Palos Verdes | Kathryn Placido – Alhambra |
| JoAnn Watson | Kathy Browning |
| Joaqeen Carlon – Lakeview Terrace | Kathy Kamei |
| Joe Blake | Katie McNamara |
| Joe Blonde | Kelly Canizzaro |
| Joe Kaltenbach | Kelly Stone – Yorba Linda |
| Joe Sparacio – Los Angeles | Ken Leong |
| Joe Wilson – Pasadena | Ken Saruwatari – Lomita |
| Joel Olmos – Lakeview Terrace | Ken W |
| John Absmeier | Kent Burns |
| John and Kelly Navarro | Kevin Scherff |
| John B Silva – Walnut | Kim Stapher |
| John Berry | Kim Stapher |
| John Bickel - Brea | Kim Zaan – Cypress |
| John F. Levi – Anaheim | Kimora Sanchez – Lakeview Terrace |
| John Fonti – Thousand Oaks | Kisa Ehmke – Glendora |
| John Francis | Kristen Lehne |
| John Henneke – Santa Ana | Kristi Byer |
| John Pakusich | Krista Miller |
| John Pirie | Kristin Jacobson |
| John Rasor | Kymerlie Piekola |
| John Reekie | Laila Gomulka |
| John Reekie – San Gabriel | Lara Sarvian |
| John Young | Laszlo Furdek |
| Jon Atkinson – Huntington Beach | Laura Sandidge – Riverside |
| Jon Russell | Laurelia Walker |
| Jordan Rosenberg – Newport Coast | LeAnne Larsen |
| Jorge Dominguez | Lennyn Banos – Lakeview Terrace |
| Jose Arroyo | Linda Perez |
| Joseph Hoskins | Linda Pesner |
| Joseph Lee | Luis Cruz |
| Joseph Scheil | Lunaailen Conception – Lakeview Terrace |
| Joshua Glass | Mackenzie Bolger |
| Joshua Heard – Newport Beach | Madeline Moz – Lakeview Terrace |
| Joy Markman | Marci McWilliams – San Diego |
| Joyce Trestik | Marcos Duque – Lakeview Terrace |
| Judith Demsky | Marcus Rosales |
| Judy Baily | Maria Dailey |
| Judy Prince – Rolling Hills Estates | Maria Medina |
| Julie B. Michael, InlandAction | Maria Palermo |
| Julie Kelso | Marianne Biederman |
| Kara Lynne | Mark Badraun |
| Kara Pecson | Mark Bridges – Camarillo |
| Karen Nyhlen – Garden Grove | Mark Brown |
| Karen Yoder – Redondo Beach | Mark Campbell |
| Karlene Textor | Mark Cloud – Riverside |

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

COMMENTS OPPOSING PAR 1111 AND PAR 1121 (Continued)

| | |
|-------------------------------------|-------------------------------------|
| Mark Mikulka – Long Beach | Mark Priegel |
| Mark Rel – Alta Loma | Nefi Barba – Lakeview Terrace |
| Mark Sieling | Neil Hiebert |
| Mark Talboys | Neil Siegel |
| Mark Walch | Nicholas Aire |
| Marlene | Nick Juliani |
| Martha DaBrow | Niel Aguilon |
| Martha Fuchs | Nina Mihalik – San Clemente |
| Mary | Olivia Lopez – Lakeview Terrace |
| Mary Kelly | OP |
| Mary Voss | Oscar Ramos |
| Mason Velasquez – Lakeview Terrace | P. Sluder |
| Mathew Millen – Santa Monica | Pam Busciglio |
| Matthew Calvario – Lakeview Terrace | Pam Miner - Brea |
| Matthew Reiser | Pat |
| Maximus Melero – Lakeview Terrace | Patric Barry – Laguna Hills |
| Melinda Thomas – La Mesa | Patricia Palmer |
| Melody Ceron – Lakeview Terrace | Patrick Lyons |
| Memo Lazalde | Paul Wilson |
| Merle Newman | Pearl – Rialto |
| Michael Greer | Peter Campbell |
| Michael Kyne | Peter Smock |
| Michael O'Brien | Phil and Alice Stewart |
| Michael Schmidt | Phil Pugh |
| Michael Schmidt | Phillip Jimenez |
| Michael Stump | Phyllis Wood |
| Michael T. Placido – Alhambra | Priscilla Huerta – Lakeview Terrace |
| Michael West | R Scot Smith |
| Michelle Nocera | Ragnar Arnesen |
| Mike Denton – Upland | Rain Gonzalez – Lakeview Terrace |
| Mike Furb | Ralph Ballew |
| Mike Guarnieri | Ralph Giditz |
| Mike Harp | Ramona Champion |
| Mike Kennard – Riverside | Randee Roberts |
| Mike Schmitt | Randy Knight |
| Mike Scmitt | Ray Joseph – Manhattan Beach |
| Mirandi Babitz | Ray Madsen |
| Miriam Benell – Whittier | Ray Russell – Manhattan Beach |
| Mirian Melendrez | Reid Vitarelli |
| Mitchell Aratin | Reniel Aguilon |
| Mitzi March Mogul | Richard |
| Mona Clark | Richard Celis – Lakeview Terrace |
| Mory Mason | Richard Glass |
| Mountain Biker | Richard Noltensmeier |
| Nancy Ahlering | Richard Noltensmeier – Whittier |
| Nancy Casey | Rick S |
| Nancy Hicks | Rigo Tena – Lakeview Terrace |
| Nancy Scarbrough | Rob Abney |
| Ned Brines | |

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

COMMENTS OPPOSING PAR 1111 AND PAR 1121 (Continued)

| | |
|------------------------------------|-------------------------------------|
| Rob Fielder | Stephen Graham |
| Rob Robbins | Steve Aminoff |
| Robert Horvath – Long Beach | Steve Coburn |
| Robert Howarth – San Diego | Steve Cohen |
| Robert LeJeune | Steve De Baets – Manhattan Beach |
| Robert Lipton | Steven D. Wyard – Northridge |
| Robert Meehan – Anaheim | Steven Freeman |
| Robert Pinter | Steven Keel |
| Robert Tomczak | Steven Kreager |
| Roberta Sabadin – Dana Point | Steven Moscowitz |
| Roberto Santiago | Steven Quon |
| Roberto Santiago | Stuart Smith |
| Robin Rudisill | Susan Beauchene |
| Rodge | Susan E. McClymonds – Pasadena |
| Roger Kersey | Susan Prager |
| Ron Aimone | Tamara Karpowitz |
| Ron La Russa | Tara Petrina |
| Ron Nipper | Terry Kelly |
| Ron Vargo | Thiago Correa – Lakeview Terrace |
| Rose Marie Smith – Tujunga | Thomas Hutton |
| Roy Rivenburg – Placentia | Thomas Lofaro |
| Russell Rogers – Perris | Tim Loft |
| Ruth Kobayashi | Tim Steele |
| Ryan Hathaway | Timothy Morris |
| Ryland Watts | Timothy Westhoff |
| S MP | Tina |
| Sally Chavez – Menifee | Tina Grossman – Santa Monica |
| Sam Wong | TM Snyder – Chino Hills |
| Samantha Rivera, Lakeview Terrace | Tobias Venable |
| Sandi Petkus | Todd Snelson |
| Sandra Needs – Alhambra | Tom Rath |
| Sandy Ridout | Tom Vogt – Fullerton |
| Santi Rivas – Lakeview Terrace | Tommy Hudspeth |
| Scott Free | Trent Barrow |
| Scott Huffman – San Diego | Troy Carner |
| Scott McCormack | Twila King |
| Scott Peotter | Tyler Fer |
| Scott Whitehurst | Valeria Martinez – Lakeview Terrace |
| Sean O'Brien, Venice | Veronica Shaw |
| Selvin Enriquez, Lakeview Terrace | Vic Blakemore – Murrieta |
| Sergio Gonzalez | Victor Hernandez |
| Shannon Malmfeldt | Victoria Fisher-Briggs |
| Sharon D. Brimer -Lake Forest | Wayne Torrey |
| Sheila Peterson | Wenda Kanemaru |
| Shirley Ritsch | Wendy Rodgers |
| Shirley Santiago | Wendy Turner |
| Stacie Endicott – Mission Viejo | Wilburman |
| Stefania Moreno – Lakeview Terrace | Ximena Navarro – Lakeview Terrace |
| Stephanie Kossoris – Grand Terrace | Yair Lomeli – Lakeview Terrace |

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

COMMENTS SUPPORTING PAR 1111 AND PAR 1121

- Amy Luna Capelle, Women for American Values and Ethics (WAVE)
- Will Barrett, American Lung Association
- Marc Carrel, Breathe Southern California
- Yassi Kavezade, Building Decarbonization Coalition
- David Martinez, Climate Action Campaign
- Gracyna Mohabir and Ashley Jackson, California Environmental Voters
- Ruth Ann Norton, Green & Healthy Homes Initiative
- Fernando Ochoa, Sheet Metal, Air, Rail and Transportation workers (SMART) Local Union 105
- Fran Pavley, University of Southern California Schwarzenegger Policy Institute
- Dr. Analissa Schilla, California Air Resources Board

- One letter signed by the following members of the California State Senate and Assembly:
Senator Henry Stern, SD 27; Senator Ben Allen, SD 24; Senator Caroline Menjivar, SD 20;
Assemblymember Isaac Bryan, AD 55

- One letter signed by the following organizations: Fernando Gaytan, Earthjustice; David Diaz, Active San Gabriel Valley; Gracyna Mohabir, California Environmental Voters; David Martinez, Climate Action Campaign; Christopher Chavez, Coalition for Clean Air; Charles Miller, LA Climate Reality Project; Kim Orbe, Sierra Club Angeles Chapter; and Ben Stapelton, US Green Building Council-California (USGBC-CA)

- Letter submitted by Kim Orbe, Sierra Club Angeles Chapter, with comments from the following members and constituents:

A. C. – Glendale
A.L. Steiner – Cornwallville
Adrian Gomez – Paramount
Adriana Garcia – Hawthorne
Adriana Pinedo – La Verne
Adrienne Martin – Claremont
Afsoon Ekhteraei – Irvine
Aida Ashouri
Aimee Suen
Alan Solomon – Palm Desert
Alberto Saavedra – Sherman Oaks
Alejandra Ruiz - Ontario
Alexa McMahan – Huntington Beach
Alice Anderson
Alisa Reich – Los Angeles
Alison Cameron – Long Beach
Alva Williams – Joshua Tree
Amanda Altman – Los Angeles
Amber Vazquez – Cypress
Amelia Kacena
Amir Baum – Aliso Viejo
Amy Harrison – Murrieta
Beverly Cartwright – Placentia
Beverly Lafontaine-Pasadena

Amy Kim – Newhall
Amy Munnely – Irvine
Andre Thomas – Los Angeles
Andrew Cobb
Angela Carter – San Pedro
Anita Connors – Rancho Pals Verdes
Anita Lin
Anita Rodal – Manhattan Beach
Anna Connolly – Beverly Hills
Anna Gerrard
Anne Dugaw – Costa Mesa
Anne Marie Zuckerman – Encino
Antonio Torres, Jr.
Ashley Taylor – Pasadena
Audrey Todd – Los Angeles
Audrey Williams
Austin Nelson – Los Angeles
B. Tepp – Beverly Hills
Barbara Poland – La Crescenta
Barbara Wadkins – Malibu
Barbara Wilson - Altadena
Beth Beringer – Encinitas
Bin Lee
Bonnie Abel – Sunland

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

COMMENTS SUPPORTING PAR 1111 AND PAR 1121 (Continued)

| | |
|---|---|
| Bonnie Blitzsetin – Los Angeles | Cynthia Levy – Seal Beach |
| Brenda Shelley-McIntyre – Laguna Niguel | Cynthia Rose |
| Brent Schoenfeld – Tarzana | Cynthia Sayre – Rancho Santa Margarita |
| Brian Flaherty | Cynthia Smith – Mission Viejo |
| Brian Gillespie - Inglewood | D. Fachko – Buena Park |
| Brian Pope – Los Angeles | Dale Zapata |
| Brianna Lopez | Daniel Marino |
| Brina Simon | Darius Derakshan – Los Angeles |
| Bruce Hirayama – Los Angeles | Dave Brisbin – Santa Monica |
| C. S. – Long Beach | David Beaulieu – Los Angeles |
| Candace Rocha – Los Angeles | David Diaz |
| Candace Seu | David Diaz, Active San Gabriel |
| Candi Hubert – Newport Beach | David Rynerson – Huntington Beach |
| Carla Finnerman – Santa Monica | David Shahal – La Crescenta |
| Carla Simms – Los Angeles | David Smith – Cathedral City |
| Carmen Jurado – Aliso Viejo | David Tran and Emily Roh |
| Carmen Stramara – Aliso Viejo | Davina Dobrovech – Burbank |
| Carol Lynne Eyster – Redlands | Dayna Anderson – Dana Point |
| Carolyn Rhazi – Mission Viejo | Deborah Ebersold – Los Angeles |
| Carrie Tokunaga – Culver City | Deborah Ebersold – Los Angeles |
| Casey Law – South Pasadena | Deborah Fallender – Santa Monica |
| Catherine Beauchamp – Pasadena | Deborah Locksley Burkhart – Pacific Palisades |
| Catherine Corwin – Santa Monica | Deborah Migala – Walnut |
| Catherine Lefebvre – North Hollywood | Deborah Solleveld – Norco |
| Cathy Ashley – Santa Monica | Debra Shaw – Hemet |
| Cathy Thornburn – Los Angeles | Dency Nelson – Hermosa Beach |
| Charles and Karen Julien – Fullerton | Dennis Cajas – Apple Valley |
| Charles Miller, LA Climate Reality Project | Dennis Worthington – Reseda |
| Chelsey Marsing – Santa Monica | Desiree Lenart |
| Cher Gilmore - Newhall | Diane Schlitt-Thompson – Ontario |
| Cheryl Auger and Chris Peck- Pasadena | Dominick Falzone |
| Cheryl Holder – Culver City | Donald Stonebrook – Whittier |
| Chris Etow – San Francisco | Donna Harris – Signal Hill |
| Christina Martinez – Santa Ana | Donna Murphy – Riverside |
| Christine Ressa – Redlands | Donna Perkins - Torrance |
| Christine Ro – Granada Hills | Dorien Upton – Riverside |
| Christine Ziegler – Palm Desert | Drew Tager |
| Christopher Chavez, Coalition for Clean Air | Duane Varner – Highland |
| Christy Schilling – Glendale | Dylan Plummer, Sierra Club |
| Cindie Woods – Dana Point | Elizabeth Shafer – Huntington Beach |
| Cindy Mills – Marina Del Rey | Ellen Alpestein – Palm Desert |
| Cissy Enzmann – Whittier | Ellen Davis – Los Angeles |
| Claudia Funke – Pasadena | Elliot Sernel – Palm Springs |
| Cody Low – Los Angeles | Emily Churchill – Whittier |
| Colin Bogart – Pasadena | Erfin Hartojo – Walnut |
| Cyndi Courter – Buena Park | Eric Ericson -Beverly Hills |
| Cynthia Coley – Lake Forest | Erika Armin – Los Angeles |
| | Erin Suyehara -Torrance |

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

COMMENTS SUPPORTING PAR 1111 AND PAR 1121 (Continued)

| | |
|---|-----------------------------------|
| Erwin Pizarro – Los Angeles | J Z – Muskegon, MI |
| Eugene Batruk – Palm Springs | Jack Salem – Los Angeles |
| Eva Adamyan – Los Angeles | Jairo Avalos |
| Eva Gardner – San Clemente | James Conn – Santa Monica |
| F. Carline Reuscher – Costa Mesa | James Donadio – Palm Springs |
| F.R. Eguren | James Hopkins – Pasadena |
| Faye Rye – Torrance | Jamie Chen |
| Fernando Gaytan, Earthjustice | Jane Fawke – Joshua Tree |
| Fernando Marquez Duarte | Janice Rosse – Irvine |
| Fernando Ochoa, SMART Local Union No. 105 | Janine Hicks – Porter Ranch |
| Florence Silverstein – Valley Village | Jayne Pitchford – Santa Monica |
| Ford Taylor – Pasadena | Jazmin Joyce |
| Frank Ortiz – Los Angeles | Jean Wise – Mission Viejo |
| Frank Selig – Hawthorne | Jeanne Goesten Kors – Los Angeles |
| Gail McMullen – Los Angeles | Jeff Duncan – Los Angeles |
| Gary Coyne | Jeff Haas – Los Angeles |
| Georgia Goldfarb - Malibu | Jeff Peiffer – Lake Forest |
| Geraldine Carrillo – Fullerton | Jeff Santner |
| Gerrit Woudstra – Pasadena | Jeff Santner |
| Gila Wdowinski – Laguna Beach | Jeffrey Jenkins – Diamond Bar |
| Gilberto Mendez – North Hollywood | Jeffrey Jones – Sherman Oaks |
| Glenn Etow – Laguna Beach | Jeffrey Morris – Mountain Center |
| Glorhea Matthews – Carson | Jenna Cobb |
| Grace | Jenna Latt |
| Gracyna Mohabir, California Environmental Voters | Jennifer Houseal – Agoura Hills |
| Greg C. – Santa Ana | Jennifer Louie |
| Gregory Nelson – San Pedro | Jerry Winer – West Hills |
| Gregory Tabat – Santa Ana | Je-Show Yang |
| Guisel Hernandez - Lynwood | Jessica McDermott – Riverside |
| H. Jenkins – Huntington Beach | Jill Clark - Lancaster |
| Hannah Bentley – San Pedro | Jill Mulato |
| Hannah Bruhns | Jillian Pecoraro – Landers |
| Heather Rudin – Lancaster | Jim B Perry – Rancho Mirage |
| Heather Schraeder – Aliso Viejo | Jim Haley – Santa Clarita |
| Helen Zimmerman – Palm Springs | Joe Futterer – Topanga |
| Hilda Koning-Bastiaan – Palm Springs | Joe Galliani – Redondo Beach |
| Holly Zentz – Los Angeles | John Hale – La Canada Flintridge |
| Hourie Alahaydoian – Lake Forest | John Quigley – Woodland Hills |
| Imara Francioni – Los Angeles | John Scmittauer – Millfield, OH |
| Io McNaughton – Pasadena | John Shell – Granada Hills |
| Irene Roseen Yildiz – Los Angeles | Jon Sheehan |
| Irene Roseen Yildiz – Los Angeles | Jonathan Lang – Pasadena |
| Isabella Panigua-Novak – Los Angeles | Jorge Rivera |
| Isabelle Du Soleil – Isabelle Du Soleil | Jorge Rivera |
| lynne Jeffries – Laguna Niguel | Josef Svoboda – Pasadena |
| J McCune – Pasadena | Josef Svoboda – Pasadena |
| Marina Del Rey | Judith Turner – |
| Judy Branfman | Judy Branfman – Santa Monica |
| | Julie Holguin – Los Angeles |

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

COMMENTS SUPPORTING PAR 1111 AND PAR 1121 (Continued)

Justin Troyka – South Pasadena
Justine Jagoda – West Hollywood
Kailey DeMeo – Los Angeles
Kaitlin Taszarek – Los Angeles
Karen Hellwig – Los Angeles
Karen Larson – Chino
Karen Lee – Glendale
Karen Mundwiller – Huntington Beach
Karl Twombly – Rancho Mirage
Kent Karlsson – Valley Village
Keona Winkler
Kerry McGrath – North Hollywood
Kevin Kim – La Crescenta
Kim Moise – Santa Monica
Kim Nero – Riverside
Kim Orbe, Sierra Club, LA Chapter
Kimberly Orbe
Kimberly Stanick – Dana Point
KK Seeberg – Indio
Kristin F. – Twintynine Palms
Kristine Nguyen – Kristine Nguyen
Larry Yard – Palm Desert
Laura Hendon – Burbank
Lauren Davis – Hermosa Beach
Lauren Lynley – Los Angeles
Laurie Kay – Pasadena
Leanne Abbott – Yucca Valley
LeeAnn MacGavin – Yucaipa
Lena Nilsson
Leslie Simon – Woodland Hills
Lil Trabant – Long Beach
Linda Oeth – Corona Del Mar
Linda Penrose – Ranchos Palos Verdes
Lindsey Muzzio – Santa Monica
Linh Tran
Lisa Larsen - Lancaster
Lisa Laureta – Los Angeles
Lisa Perry – Redondo Beach
Lisa Swanson – Huntington Beach
Lizabeth Flyer – Burbank
Logan Nguyen – Murrieta
Lois Jones – South Pasadena
Lora Gaffney – Corona
Louis Cangemi – Los Angeles
Lucy Fried – Los Angeles
Lyda Eddington – Los Angeles
Lyn Conner – Laguna Niguel
Lynda L Cook – Canyon Country
Lynne Pateman – Los Angeles
Katherine Barron – Hermosa Beach
Katherine Hsu – Cerritos
Kathleen Gonnound – Los Angeles
Kathryn Lotz – Tujunga
Kathy Dorr – La Verne
Kay Gallin – Los Angeles
Kelly Doyle-Matta – Danville
Kelly Henkler -Valencia
Kelly Ocampo
M G – Sherman Oaks
M.S. Epstein – Los Angeles
Maggie Chen
Mallory Buri – South Pasadena
Marcia Shakman – Canyon Country
Margaret Anderson – Rancho Cucamonga
Margaret Phelps – Los Angeles
Margarita Perez – Sylmar
Maria Rump – Manhattan Beach
Mario Grassano Jr. – Burbank
Mark Betti – Sherman Oaks
Mark Crane – Los Angeles
Mary Glazer – Los Angeles
Mary Lou Rosczyk – Murrieta
Mary Nelson – Mission Viejo
Mary Riblett – Culver City
Mary Sherwood Brock – Los Angeles
Mathers Family
Matt Simon – Los Angeles
Matt Stumbo
Matthew Davison – San Pedro
Maureen Doria – Yorba Linda
Maureen Taylor
Melanie H. – Seal Beach
Melissa Sunderland – Sherman Oaks
Melkon Marco Khanlian – La Crescenta
Melvyn Nefsky – Los Angeles
Mha Atma S Khalsa -Los Angeles
Michael Biers – Palm Springs
Michael Lueras – Chatsworth
Michael Lueras – Chatsworth
Michael Miraula – North Hollywood
Michael Monagan – Culver City
Michael Ryan – Woodland Hills
Michael Schwager – Irvine
Michael W. Evans – Los Angeles
Michele Frey – Costa Mesa
Michele Walsh – Yorba Linda
Michelle Kalbac – Los Angeles
Michelle Rypinski – Green Valley Lake

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

COMMENTS SUPPORTING PAR 1111 AND PAR 1121 (Continued)

| | |
|--|------------------------------------|
| Mitch Langelle – Valley Village | Samuel Wong – West Covina |
| Monica Mitt | Sandy Kasper – Hemet |
| Morgan Hall | Sara Hayes – Long Beach |
| Mujmela Merchant – Irvine | Sara Hofmann – Los Angeles |
| N N Day – Los Angeles | Sarah G – Woodland Hills |
| Nami H – Los Angeles | Sarah Suhich – Porter Ranch |
| Nancy Estan – Irvine | Scott Biedermann – Fountain Valley |
| Nandagopal M | Scott Hinkle – Laguna Beach |
| Natalia Sporkni – Laguna Beach | Scott Laster – Burbank |
| Nicholas Hadacek – Santa Monica | Scott Stephens – Beverly Hills |
| Nikhil Jayaram – Los Angeles | Seth Laursen – Los Angeles |
| Nikki Nian – West Hills | Seth Nelson |
| Noel Gray – Long Beach | Shalomar Loving – Running Springs |
| Omid Manon – Los Angeles | Shannon Niemeyer – Placentia |
| P.P. Soucek – Van Nuys | Sharon Torrisi – Hermosa Beach |
| Pam Jones – Canyon Country | Shelley Hellen – Long Beach |
| Pamela Perryman | Sheridan Brown – West Hollywood |
| Pamela Rogers – San Bernardino | Shreya Dhanala – San Diego |
| Patricia Reynolds – Irvine | Silvia Rocha – Azusa |
| Patrick Murphy – Long Beach | Simone Fonseca – Victorville |
| Pattie Meade – San Clemente | Sophia Hartenbaum – Irvine |
| Paul Navarro – Irvine | Stacey Amshel – Encino |
| Paula Andreozzi – Rancho Mirage | Stephanie Shlasky – Pasadena |
| Paula Rufener – Torrance | Stephanie Ziemer – Los Angeles |
| Paulette Doulatshahi -Playa Del Rey | Stephen Cartotto – Valencia |
| Penny Good – San Pedro | Stephen Kozlowski |
| Pete Marsh – Long Beach | Stephen Markel – Los Angeles |
| Peter Hunt – Beverly Hills | Steve Leiken – Anaheim |
| Phillip Cripps – Cathedral City | Steve Weinhouse |
| Pilar Reynaldo | Sue Brown – Valley Village |
| Pilates Pasadena | Sue Yager – Santa Monica |
| Rachael Jett – Torrance | SueAnn Schoonmaker – Long Beach |
| Raquel Brac – Redlands | Susan Dembowski – Pasadena |
| Rebekah Estrada – La Canada Flintridge | Susan Guild – Van Nuys |
| Rev Maria Riter Wilson – San Dimas | Susan Lea – Studio City |
| Rhonda Lyle – Granada Hills | Susan Nordine – La Verne |
| Rinea Lucia – Joshua Tree | Susan Tope – Tujunga |
| Rita Baker – Irvine | Suteibun Rin – Placentia |
| Rita Thio – Walnut | Sylvia Ren – Irvine |
| Robert Burger – Los Angeles | Tamara Paul – Jurupa Valley |
| Robert Haw – Altadena | Tammy Fait – Hesperia |
| Rod Moore – Los Angeles | Tara Gardner |
| Roslyn Cohn – Van Nuys | Taylor Paez |
| S. T. – Los Angeles | Teresa Mynko – Yucaipa |
| Sally Sanders – Laguna Beach | Teresa Thompson – Los Angeles |
| Sam Hirsh – Northridge | Theron Akers – Westminster |
| Samuel Park - Fullerton | Thomas Fukuman - Torrance |
| Thomas Bacorn – Los Angeles | Thomas Fukuman – Torrance |
| Thomas Cameron-Stuart – Perris | Tina Markowe – Los Angeles |

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

COMMENTS SUPPORTING PAR 1111 AND PAR 1121 (Continued)

Tom Hazelleaf – Seal Beach
Tom Hogen-Esch – San Marino
Tom Hughes – Pomona
Tom Kunhardt – Oakland
Toni Kimball – Santa Ana
Toshio Ozawa – San Gabriel
Trinidad Villanueva – Alhambra
Troy McClellan – Costa Mesa
Twyla M. Meyer – Pomona
Valerie Garrett – Los Angeles
Vanessa Stine – Encino
Vesta McDermott – Redondo Beach
Vicki Hughes – Huntington Beach
Victor Kamendrowsky – Rancho Santa Margarita
Victoria Berry – Morro Bay
Victoria Brandon – Northridge
Wendy Fears – Irvine
William C. Valaika – Newport Beach
William Winburn – Rancho Palos Verdes
WM Briggs – Hermosa Beach
Yvonne Neal – Playa Del Rey
Yvonne Smith – Upland

- One letter submitted by Kim Orbe, Sierra Club Angeles Chapter, with comments from the following members and constituents:

| | |
|---------------------------------|-------------------------------------|
| Samantha Abarca, Northridge | Tiffany-Marie Austin, Winnetka |
| Lowell Abellon, Los Angeles | Kathleen Auwae, Corona |
| Charles Adelman, Los Angeles | Miguel Avila, Hemet |
| Julie Adelson, San Pedro | Shirley Baheri, Los Angeles |
| Alicia Aguayo, San Bernardino | Randy Baker, Placentia |
| Joy Allenspach, Irvine | Angie Balderas, Highland |
| Corina Allison, Los Angeles | Sayan Banerjee, Irvine |
| Kenneth Althiser, Cherry Valley | Flor Barajas, Santa Ana |
| Oscar Alvarez, Tujunga | Mary Baretich, Huntington Beach |
| Mary Ames, Temecula | Val Barri, Beverly Hills |
| Constance Anderson, Hemet | Kathy Barron, Hermosa Beach |
| Judith Anderson, Long Beach | S. Barryte, Rancho Palos Verdes |
| Bret Andrews, Oakland | Steven Barryte, Rancho Palos Verdes |
| Trish Aquino, Alhambra | Mark Bartleman, Laguna Beach |
| Johanna Arellano, Fontana | Miriam Baum, Alta Loma |
| Francisco Arellano, Fontana | Tim Baumgartner, Torrance |
| Mark Armstrong, Pasadena | Kelly Bautista, Westwood |
| Robert Aronson, Venice | Susannah Baxendale, Culver City |
| Bryanna Arreola, South Pasadena | Heidi Bean, Corona |
| Aida Ashouri, Whittier | Heidi Jo Bean, Corona |
| Nancy Attanasio, Pasadena | Carrie Bearden, Los Angeles |
| Andy Au, South Pasadena | Suzi Beaton, Beverly Hills |

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- One letter submitted by Kim Orbe (Continued)

Julie Bechtloff, Culver City
Hilary Beck, Glendale
Shari Becker, West Hills
Richard Bejarano, Lake Elsinore
Kae Bender, Lancaster
Doug Bender, Redondo Beach
Heather Benedict, Palm Springs
Hannah Bentley, San Pedro
Peter Berg, Burbank
Jeffrey Berman, Los Angeles
Abbie Bernstein, West Hollywood
Adam Bernstein, Los Angeles
Blaze Bhence, Cypress
Kathy Bilicke, Los Angeles
Kathy Bilickie, Los Angeles
Jennifer Binstock, Los Angeles
Jennifer Biswas, Culver City
Ian Bixby, Long Beach
Mona Blaber, Palm Springs
Richard Blain, Temecula
Catherine Blanco, Long Beach
Lisa Bloomfield, Los Angeles
Laura Boccaletti, West Hollywood
Ralph Bocchetti, Fontana
Willaim Boehme, Laguna Niguel
Dean Bok, Los Angeles
Scott Boller, Granada Hills
Mathieu Bonin, Los Angeles
Rodney Boone, San Pedro
Vic Bostock, Altadena
Tina Bowman, Long Beach
Judy Bradford, Rancho Palos Verdes
Alex Bradley, Riverside
Cathy Brandolisio, Sherman Oaks
Kevin Brandon, Palm Desert
Danielle Bratis-Smith, Lakewood
Leslie Bravo, Fontana
Mike Breidegam, Canoga Park
Willaim Briggs, Hermosa Beach
Susan Brisby, Lancaster
Elliot Bronwein, Newhall
Indee Brooke, Sunland
Hannah Bruhns, Manhattan Beach
Theresa Bucher, Tarzana
Theresa Bucher, Tarzana
Mike Bullock, Oceanside
Holly Burgin, Van Nuys
Serena Burnett, Bradbury
Rebecca L. Burns, Los Angeles

Sam Butler, Los Angeles
Sandra Butler, Los Angeles
John Cain, Palm Springs
Linda Callas, Santa Monica
Shelly Callendar, Cathedral City
Susan Cameron, Fountain Valley
Judith Campo, Canoga Park
Sol-Angel Campuzano, Sylmar
Elaina Caner, Costa Mesa
Miriam Cantor, Los Angeles
Sahira Cardenas, Fontana
Juan Cardenas, Fontana
Rita Cardenas, Fontana
Juan M Cardenas, Fontana
Angel Cardenas, Fontana
Javier Cardenas, Fontana
Lizette Cardenas, San Bernardino
Jennifer Cardenas, Fontana
Alicia Cardona, San Diego
Maryfrances Careccia, West Hollywood
Valerie Carrick, Ontario
Martin Carrillo, Pasadena
Angela Carter, San Pedro
James Cassimus, San Clemente
Jennifer Celio, Long Beach
Avery Cervantes, Long Beach
Karla Cervantes, Mead Valley Perris
Gina Chamberlain, Los Angeles
Chris Chambers, Los Angeles
Peyton Chambers, Ladera Ranch
Cathy Chambers, Long Beach
Ariel Chapman, Los Angeles
Bobbi Jo Chavarria, Fontana
Phyllis Chavez, Santa Monica
Raymond Chernick, Scottsdale AZ
Alan Chen, Los Angeles
James Cherry, Santa Monica
Tami Chipeco, Glendale
Mark Chotiner, Thousand Oaks
Sandra Christopher, Burbank
Wes Chuang, Los Angeles
Rhonda Church, San Clemente
Maimouna Cisse, Inglewood
C L , San Gabriel
Robert Clark, West Covina
Barri Clark, Los Angeles
Robyn Class, Orange
Isaiah Clayton, Inglewood
Frederick Cliver, Long Beach

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

One letter submitted by Kim Orbe (Continued)

| | |
|--------------------------------------|-------------------------------------|
| Dorothy Comeau, Topanga | Renee Conley, Los Angeles |
| Sean Connelly, Redlands | Claudia Ellano, Lakewood |
| William Connor, Long Beach | Charles Elliot, Hacienda Heights |
| Thomas Conroy, Manhattan Beach | Janice Elliot, Upland |
| Melissa Contreras, Hacienda Heights | Norm Ellis, Corona Del Mar |
| Leslie Contreras, Reseda | David L. Ely, Saugus |
| Diana Contreras, Rancho Cucamonga | Monica Embrey, Los Angeles |
| Alicia Coronel, Fontana | Melinda Encinas, Glendora |
| Celeste Cortez, North Hills | Marilyn Eng, Diamond Bar |
| Renee Cossutta, Sierra Madre | Teresa English, Los Angeles |
| Tim Cox, Claremont | Felipe Escobar, Glendale |
| Scott Crawford, Los Angeles | Cristina Lee Escudero, Lynwood |
| Phillip Cripps, Cathedral City | Elizabeth Estes, Pasadena |
| Barbara Crofford, Los Angeles | Jakob Evans, Sacramento |
| Santa Crump, Oceanside | Roger Ewing, Agoura Hills |
| Susanne Cumming, Marina Del Rey | Sharon Fain, Yucca Valley |
| Dianne Daley, Seal Beach | Tobias Fairman, Glendora |
| Denise Dangelo, Redondo Beach | Stephen Falgout, Murrieta |
| Paul Daniel Dapkus, Fullerton | Gail Farina, Los Angeles |
| Alice Darby, Los Angeles | Pauline Faye, San Clemente |
| Jeanne Davenport, Long Beach | Khris Feazell, Los Angeles |
| Margaret Davies, Lake Forest | T Feldman, La Canada |
| Jill Davine, Culver City | Wayne Fellabaum, Palm Springs |
| Marianne Davis, Encino | Gregg Ferguson, Rancho Palos Verdes |
| Donald R. Davis, Calabasas | Kathleen Fernandez, Yorba Linda |
| Ryan Davis, Burbank | Lisa Fields, Los Angeles |
| Donald Davis, Calabasas | Ed Fisher, Pasadena |
| Vicki Debear, Chatsworth | Stephen Fitch, Thousand Oaks |
| Patricia Deninger, Torrance | Colleen FitzSimons, San Diego |
| Susan Deo, Rancho Palos Verdes | Jessica Fleischmann, Los Angeles |
| Evan Mc Dermitt, Fullerton | Reanna Flores, Los Angeles |
| Greg Destro, Murrieta | Katherine Footracer, Altadena |
| Gayle Dicarlantonio, Riverside | Wendy Frado, Van Nuys |
| Roberta Dill, Long Beach | Ross Frankel, Cathedral City |
| Edward Dollard, Santa Monica | Mary Franz, Laguna Beach |
| Susan Donaldson, Irvine | Amy Franz, La Habra Heights |
| Soraya Dosaj, Van Nuys | Frank Frattaroli, Los Angeles |
| Vinny Droughton, West Hollywood | Ashton French, Northridge |
| Peaslee DuMont, Vallejo | Michael Frick, Palm Springs |
| Alexander Dunaev, Marina Del Rey | Teresa Fricke, Highland |
| Diana Duncan, Santa Monica | Sarajo Frieden, Los Angeles |
| Tristan Dunker, Garden Grove | Phyllis Frisbie, Sacramento |
| Claude Duss, Calabasas | Jeff Fromberg, Los Angeles |
| Robyn E., Los Angeles | Susan Fuchs, Granada Hills |
| Chris Eaton, Los Angeles | Darcy Fudge, Long Beach |
| Susan Eberhardt, San Juan Capistrano | Kristina Fukuda, Los Angeles |
| Elizabeth Edwards, Newport Beach | Andy Fung, Monterey Park |
| Charlene Elgart, Los Angeles | Marc Futernick, Pasadena |

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- One letter submitted by Kim Orbe (Continued)

| | |
|------------------------------------|---|
| Joe Futterer, Topanga | Audra Guettler, Long Beach |
| Brian Gabelman, Los Angeles | Lavonne Gunn, Santa Fe Springs |
| Daryl Gale, Los Angeles | Melanie Haake, West Hollywood |
| Catherine Gallagher, Monrovia | Ken Haber, Altadena |
| Kay Gallin, Los Angeles | Brenda Haig, Long Beach |
| Rob Gallinger, Menifee | Holly Hall, Temecula |
| Craig Galloway, Santa Monica | Holy Hall, Temecula |
| Lawrence Garber, Irvine | James Hamilton, Palos Verdes Estates |
| Gina Garcia, Santa Monica | Lisa Hammermeister, Granada |
| Marrittza Garcia, Fontana | Susan Hanger, Topanga |
| Edgardo Garcia, La Puente | Rebecca Hanna, Long Beach |
| Manuel Garcia, La Puente | Liz Harsch, Hermosa Beach |
| Luis Garcia, Los Angeles | Lucy Hart, Encino |
| Paula Garcia, La Puente | Ali Hart, Los Angeles |
| Lourdes Garcia, El Monte | Lisa Hart, Los Angeles |
| Miguel Garcia, El Monte | Jim Hartung, Santa Monica |
| Tara Gardner, Los Angeles | James Hartung, Santa Monica |
| Julie Garner, Villa Park | Francine Harvey, Sierra Madre |
| Regalado Geoff, Burbank | Samer Hassan, Rancho Cucamonga |
| Cynthia Gerard, Glendale | Chris Hays, La Canada Flintridge |
| Chris Geukens, Northridge | Stanley Hecht, Los Angeles |
| Evan Gillespie, Culver City | Ross Heckmann, Arcadia |
| Matthew Gillespie, Redondo Beach | David Heinrichsen, Rancho Mission Viejo |
| Catherine Gish-Persi, Claremont | Mary Ann Hereford, Los Angeles |
| Mark Glasser, Los Angeles | Beth Herndobler, Pasadena |
| Patricia Gleason, Sanger | Laura Herndon, Burbank |
| Daniel Goldberg, Riverside | Fred Herrera, Sun Valley |
| Rosa Gonzalez, Fontana | Fred Herrera, Sun Valley |
| Alan Gonzalez, Long Beach | Leonard Herzog, Los Angeles |
| Erik Gonzalez-Kramer, Los Angeles | Marla Hess, Fullerton |
| Beth Goode, Los Angeles | Janine Hicks, Porter Ranch |
| Lori Goodman, Beverly Hills | Christopher Hilger, Fountain Valley |
| Carolina Goodman, Sherman Oaks | Deborah Holcomb, Los Angeles |
| Norman Goss, Glendale | Winifred Hopkins, Fullerton |
| Janet Graff, Pasadena | Anne Hormann, Pasadena |
| Lisa Hammermei, Granada Hills | Linda Howie, West Hills |
| Stevie Gray, Los Angeles | Lara Ingraham, Los Angeles |
| Jammy Gray, Rancho Cucamonga | Eddie Isaacs, Los Angeles |
| Margie Gray, Rancho Cucamonga | Holly Isaacson, North Hollywood |
| Elena Green, Los Angeles | Barbara Ishida, Pasadena |
| Nina Greenberg, Los Angeles | Dehra Iverson, Costa Mesa |
| Scott Greene, Yorba Linda | Steve Iverson, Newport Beach |
| Stuart Greensburg, Stevenson Ranch | Alicia Jackson, Los Angeles |
| Jennifer Gregg, Valencia | Roy Jackson, Torrance |
| Jennifer Gregg, Valenica | Caterina Janacua, Sherman Oaks |
| Deborah Gregory, Culver City | Ashley Javier, Los Angeles |
| Thomas Gregory, Dana Point | Julien Jegou, Aliso Viejo |
| Jeffrey Greif, Venice | Jim Jennett, Indio |
| Mark Hayduke Grenard, Phoenix AR | Beka Jenson, Laguna Niguel |

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- One letter submitted by Kim Orbe (Continued)

| | |
|---|------------------------------------|
| Jennifer Jerlstrom, Buena Park | Pamela Lawrence, Los Angeles |
| Eliza Johansen, Los Angeles | Carl Lay, Los Angeles |
| Sadie Johson, Long Beach | Sherry Lear, San Pedro |
| Sadie Johnson, Long Beach | Harlan Lebo, La Mirada |
| Julianne Jolley, Laguna Beach | Karen Lee, Glendale |
| Lee Jordan, Los Angeles | Steve Leiken, Anaheim |
| Alena Jorgensen, Temple City | Suzanne Lenhart, Westminster |
| A. Elizabeth Johansen, North Hollywood | Pat Lenz, Desert Hot Springs |
| Ruth Judkins, Pasadena | Alejandra Leon, South Gate |
| Scott Jung, South Pasadena | Dalinef De Leon, Fontana |
| Saran K., Los Angeles | Denise Leos, Long Beach |
| Billy Kampen, Santa Margarita | Jeanne Lepowsky, Laguna Woods |
| Deepti Kannapan, Redondo Beach | Vincent Leveque, Los Angeles |
| Donna Kaufman, Murrieta | Chris Leverich, Playa del Rey |
| Yassamin (Yassi) Kavezade, Riverside County | Jennifer Levin, Anaheim |
| Lori Kegler, San Pedro | Jalen Lewis, Redlands |
| Stacey Keller, Thousand Oaks | Eugenie Lewis, Redondo Beach |
| Daniella Kellogg, Garden Grove | Fred Licht, La Crescenta |
| Christi Kenna, La Habra | Margaret Light, Van Nuys |
| Nareg Keshishian, Woodland Hills | Jessica Likens, Buena Park |
| Dr. Mha Atma Khalsa, Los Angeles | Elizabeth Linares, Colton |
| Sharon Kidwell, Riverside | Julie Lindow, San Francisco |
| Amy Kim, Newhall | Linh Tra Linh, Los Angeles |
| Kevin Kim, La Crescenta | Ellen Little, Studio City |
| Ariel D King, Los Angeles | Marissa Llanes, Pomona |
| Kerri King, Aguanga | Stephanie Llarro, Woodland Hills |
| Carol Kinser, Elk Grove | John Lombardi, North Hollywood |
| Vicki Juditz Kirschenbaum, Burbank | James Longman, Los Angeles |
| Joel Kirschenstein, Westlake Village | Elianna Lopez, Los Angeles |
| Rene Klaassen, Los Angeles | Rebecca Lopez, Cathedral City |
| Renee Klein, Marina Del Rey | Rosa Lopez, Panorama City |
| Leslie Klein, Los Angeles | Naomi Lopez, Riverside |
| Greg Klinger, Los Angeles | Doggo Lopez, Rancho Cucamonga |
| Kathy Knight, Santa Monica | Crystal Loucel, San Francisco |
| Georgia Koenig, Garden Grove | Donna Lubansky, Los Angeles |
| Kathleen Koller, Laguna Niguel | Jennifer Lupercio, Jurupa Valley |
| Stephen Kozlowski, Temecula | S M, Santa Monica |
| Steven Korson, Riverside | Nina Macdonald, Silverado |
| Jean Kravitz, Mission Viejo | Donald Sage Mackay, South Pasadena |
| Sofia Kuegeman, Valenica | Beverly Magid, Sherman Oaks |
| Paul Kulhanek, Monterey Park | Ellen Mahoney, Van Nuys |
| Tom Kunhardt, Oakland | Eugene Majerowicz, View Park |
| Robert Kurz, Laguna Niguel | Janet Maker, Los Angeles |
| Georgia Labey, Palm Desert | Marisela Maldonado, Colton |
| Edward Landler, Los Angeles | Jo Mandrell, Upland |
| Kenneth Lapointe, Los Angeles | Amira Mansour, Irvine |
| Ann Larson, Palm Springs | Gerald Mantoya, Sylmar |
| Lisa Laureta, Los Angeles | Curtis Marantz, Riverside |

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- One letter submitted by Kim Orbe (Continued)

| | |
|--|--------------------------------------|
| Michael Marciano, North Hollywood | Kathy Monteleone, Murrieta |
| Lionel Mares, Los Angeles | Holly Moore, Lakewood |
| Robert Markovic, Los Angeles | Ronald Morein, Long Beach |
| David Marrett, Wildomar | Aleen Moreland, Apple Valley |
| Jacqueline Marroquin, Los Angeles | Allison Morrell, Long Beach |
| Pete Marsh, Long Beach | Kent Morris, Fullerton |
| Katherine Marshall, Rancho Cucamonga | Maryam Mortezaiefard, Woodland Hills |
| Greg Marshall, Rancho Cucamonga | Patricia Morton, Los Angeles |
| Michaela Martin, Irvine | Chidi Moseri, Los Angeles |
| Antoinette Martinez, Los Angeles | Samantha Moulton, Burbank |
| Robert Martinez, Irvine | Todd Moyer, Los Angeles |
| Sara Martinez, Ontario | Marva Murphy, Burbank |
| Bryan Matsumoto, Temple City | John Murray, Los Angeles |
| Jeff & Sonia Matsuno, Redondo Beach | Joan Murray, Los Angeles |
| Karen May, Ontario | Janet W, Murrieta |
| Mary Barton Mayes, Long Beach | Deborah Murtagh, Seal Beach |
| Robin Mayne, Long Beach | Sami Mzali, Van Nuys |
| Cynthia McCarthy, Rancho Mission Viejo | Jaime Nahman, Topanga |
| Michael McCarthy, Riverside | Daniel Nakashima, Long Beach |
| Kerry McCarthy, Chico | Mary Nambo, La Puente |
| EJ McConaughy, Mission Viejo | Eugenie Lewis Nan, Redondo Beach |
| Evan Mcdermit, Fullerton | Mitch M Nan, Palm Springs |
| Maureen Mcdonald, Desert Hot Springs | Suzanne Narducy, San Clemente |
| Leslie McDowell, Los Angeles | Darrell Neft, Costa Mesa |
| Deborah McIntosh, Temecula | Darell Neft, Costa Mesa |
| Sarah Mckofka, Riverside | Hope Nelson, South Pasadena |
| Donald Mclarty, Palm Desert | Kim Nero, Riverside |
| Heather Mclarty, Los Angeles | Alice Neuhauser, Manhattan Beach |
| Ronald Mcmillan, Laguna Niguel | Emily Nguyen, Los Angeles |
| Lora Meadows, Silverado | Peter Nielsen, Beverly Hills |
| Abigail Medina, San Bernardino | Glenda Nielson, Phelan |
| Annie Mendoza, Fontana | Maya Nitschke-Alonso, Los Angeles |
| Tim Mensalvas, Oceanside | Vanessa Niu, Los Angeles |
| Hildy Meyers, Huntington Beach | Jason Nolasco, Bellflower |
| Cami Miceli, Burbank | Adrianna Nunez, Van Nuys |
| Sharon Miles, Placentia | Kelly O'Donnell, Los Angeles |
| Ed Millcan, Redlands | Gregg Oelker, Altadena |
| Elaine Miller, Moreno Valley | Linda Oeth, Corona Del Mar |
| William Miller, Palm Springs | Tara Ohta, North Hollywood |
| Kellie Miller, Orange | Alejandro Ojeda, Perris |
| Joan Miller, Laguna Niguel | Yareli Olazabal, Riverside |
| Lisa Mingear, Dana Point | Krister Olsson, Los Angeles |
| Renzo Misculin, South Pasadena | Arnulfo Orozco, Fontana |
| Susanne Moelter, Sonoma | Susan Orozco-Neu, Los Angeles |
| Ceiry Molina, Fontana | Robert Ortiz, Novato |
| Maria Molund, Los Angeles | Kristen Osborne, Los Angeles |
| Troy Monk, Upland | Darby Osnaya, Colton |
| Rebecca Monk, Upland | Hillary Ostrow, Encino |
| Maria Montag, El Segundo | Siegfried Othmer, Woodland Hills |

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- One letter submitted by Kim Orbe (Continued)

| | |
|--|---|
| Henry P, Hermosa Beach | B Reese, Idyllwild |
| Aydee Palomino, La Quinta | Karla Reinhardt, Fullerton |
| Yvonne Vitt Palos, Fontana | Matthew Reola, San Clemente |
| Robert Paquette, Pasadena | Heather Reynolds, Los Osos |
| Benjamin Park, West Hollywood | Keith Rhinehart, Santa Clara |
| Jessie Parks, Riverside | Mark Rhomberg, Pacific Palisades |
| Lisa Payne-Miller, Irvine | Jody Rice, Ladera Ranch |
| Petra Pearce, Woodland Hills | Gwen Rinehart, Los Angeles |
| Lynn Pedersen, Porter Ranch | Ronald Ringle, Lake Elsinore |
| Linda Penrose, Rancho Palos Verdes | Tom Roberts, Norco |
| Licia Perea, Joshua Tree | Lucille Robustelli, San Juan Capistrano |
| Arleen Perez, Rialto | Candace Rocha, Los Angeles |
| Susan Perez, San Pedro | Lenore Rodah, South Pasadena |
| Gregory Perkins, Long Beach | Brenda Rodriguez, Mission Hills |
| Jason Perlman, Los Angeles | Jose Rodriguez, Whittier |
| Ronnie Perry, Twentynine Palms | Julio Rodriguez, Los Angeles |
| Ruth Persky, Los Angeles | Anna Rodriguez, Diamond Bar |
| Jerry Persky, Santa Monica | Perla Rodriguez, Rialto |
| Stephen and Nancy Peterson, Claremont | Daniela Rojas, Los Angeles |
| Rachel Peterson, Los Angeles | Andrea Rojas, Los Angeles |
| Carolyn Pettis, Saugus | Melissa Rojas, Los Angeles |
| Selene Pineda, Claremont | Mary Rojas, Santa Monica |
| Lisa Piner, Costa Mesa | Sheila Rollins, Laguna Woods |
| Sydney Pitcher, Lemon Grove | Martha Ronk, Los Angeles |
| Marilyn Platt, Rialto | Tyrese Rose, Moreno Valley |
| Joshua Plumley, Beaumont | Ken Rosen, Beverly Hills |
| Kathy Popoff, San Pedro | Wendy Rosenfeld, North Hollywood |
| Jon Povill, Topanga | Jay Ross, Los Angeles |
| Matt Powell, Woodland Hills | Ronald Roth, Chico |
| Donald Powers, Inglewood | Christine Rowe, West Hills |
| Dean Pratt, Los Angeles | Mary Ann Ruiz, Chino |
| Rosalie Preston, Gardena | Rosemary Ruiz, Los Angeles |
| Jason Price, Santa Clarita | Mark Rush, Rancho Cucamonga |
| Michele Prichard, Los Angeles | Susan Ryan, Los Angeles |
| Ross Pringle, Claremont | Ladd S, Grand Terrace |
| Kathy Prior, Rancho Cucamonga | Peter Said, Rancho Cucamonga |
| Leslie Purcell, Ventura | James Samis, Rancho Palos Verdes |
| Linda Pyle, San Clemente | Esmerelda Sanchez, Riverside |
| Ethel Coraje Quintero, San Fernando | Rosario Sandel, Reseda |
| Marta Quiroba, Santa Monica | William Sandercock, Los Angeles |
| Susan Rainier, Davis | Richard Sanders, Glendora |
| Bridgette Ramirez, West Covina | Danielle Sawyer, Long Beach |
| Bridgette Ramirez, West Covina | Myra Schegloff, Santa Monica |
| Kevin Ramlal, Los Angeles | Myra Scheploff, Santa Monica |
| Berenice Ramos, Moreno Valley | Hank Schlinger, Glendale |
| Allyson Finkel Rancho, Santa Margarita | Fred Schloessinger, Huntington Beach |
| Myrian Rangel, Azusa | Jerry Schneider, Los Angeles |
| Maryellen Redish, Palm Spring | Carol Schneider, South Pasadena |
| Robert Reed, Laguna Beach | Anita Schulz, Seal Beach |

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- One letter submitted by Kim Orbe (Continued)

| | |
|--|--------------------------------------|
| Linda Schulz, Lake Hughes | Neal Steiner, Los Angeles |
| Laura Schuman, Los Angeles | Heidi Stephens, Long Beach |
| Carl Schwartz, Rancho Palos Verdes | George Inashvili Stevenson, Ranch |
| Leeda Sea, Los Angeles | Jim Stewart, Lakewood |
| Alice Seamans, Moreno Valley | Hashi Stone, Monterey Park |
| Gloria Sefton, Trabuco Canyon | Mika Stonehawk, Tustin |
| John and Gloria Sefton, Trabuco Canyon | Luciano Storti, Stuido City |
| Ellen Segal, La Crescenta | Tara Strand, North Hollywood |
| Kat Selm, Thousand Oaks | Jeffrey Streicher, Long Beach |
| Rob Seltzer, Malibu | Shane Stritesky, Pasadena |
| Elizabeth Sena, Fontana | Laura Strom, Los Angeles |
| Mike Sentovich, Los Alamitos | Tom Strout, Whittier |
| Kaen Shannon, Corona | Cecilia Su'a, Carson |
| Nancy Shannon Shannon, Cathedral City | Emily Suarez, Riverside |
| Geoffrey Shaw, Upland | Kris Sucks, El Monte |
| Margaret Shekell, Los Angeles | Mary Sullivan, Huntington Beach |
| Victoria Sheperd, Glendale | Tad Sullivan, Corona Del Mar |
| Chaz Shields, Long Beach | Greg Sweel, Santa Monica |
| Dave Shukla, Long Beach | Nathan Swiderski, Fullerton |
| Marguerite Shuster, Pasadena | Grace Tam, Laguna Hills |
| Margeurite Shuster, Pasadena | Sarah Tamor, Santa Monica |
| Jonathan Silva, Fontana | Janice Tanaka, Los Angeles |
| Hlary Simonetti, Cathedral City | Cynthia Tanner, Laguna Hills |
| Tony Sirna, Berkeley | Gary Tavetian, Rancho Palos Verdes |
| Ethan Skopp, Oak Park | Tim Taylor, Indio |
| Peter Sloman, Pasadena | Cherl Tchir, Redondo Beach |
| Gabe Smalley, Los Angeles | David Tewksbury, El Segundo |
| Elizabeth Smit, Rancho Palos Verdes | Sven Thesen, Palo Alto |
| Lynn Smith, Capistrano Beach | Greg Thomson, Sausalito |
| Ralph Smith, Los Angeles | Cathy Thornburn, Los Angeles |
| Grant Smith, Westlake Village | Nancy Tierney, Pacifica |
| Hector Solorzano, Fontana | Jerry Tobe, Los Angeles |
| Abra Sonnanstine, Los Angeles | Meehar Tom, Alhambra |
| Jan Sownie, Bellflower | Jennifer Tomassi, Los Angeles |
| Danielle Soykin, Los Angeles | Suzanne Tompkins, San Clemente |
| Donald Sparks, Northridge | Jo Torina, Tujunga |
| Victoria Spencer, Rialto | Susie Tortell, Santa Monica |
| Scott Spitzer, Tustin | Maureen Toth, Studio City |
| Bruce Spring, Los Angeles | Chirstopher Tower, Laguna Beach |
| Darren Spurr, Whittier | Anna Toy-Palmer, Agoura Hills |
| A. Srinivasan, Altadena | Dennis Trembly, Rancho Palos Verdes |
| Rochelle Stahl, Mission Viejo | Christopher Trinh, Lake Forest |
| Joshua Stamberg, Los Angeles | Tia Triplett, Los Angles |
| Mark Stannard, Los Angeles | Darrell Trombley, Los Angeles |
| Garry Star, Thousand Oaks | Anne Tryba La Canada Flintridge |
| Sarah Starr, Los Angeles | Reesha Tuomi, Thousand Oaks |
| A.L. Steiner, Los Angeles | Oscar Urena, Fontana |
| Larry Steen, Encino | Ann Leslie Uzdavinis, West Hollywood |
| Cooper Steffensen, Los Angeles | |

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- One letter submitted by Kim Orbe (Continued)

Judy Valentine, Tarzana
Javier Del Valle, Montebello
Kelly Vanderlan, Claremont
Denise Vandermeer, Woodland Hills
Denise VanZago, Burbank
Sherry Vater, Los Angeles
Nancy Vaughan, Laguna Niguel
Joan Velvick, Westminster
Vanessa Villanueva, Colton
Allan Villanueva, Colton
Alejandro Villanueva, Colton
Blake Viola, Long Beach
Robert Vitt, Fontana
Judith Vogelsang, North Hollywood
Noreen Vu, Los Angeles
Inge Wagner, Los Angeles
Joan Waller, Woodland Hills
Paul Waller, Woodland Hills
Gloria Waller, Brea
Jennifer Walters, Gardena
Edith Wander, Los Angeles
Jeffrey Wang, Hacienda Heights
Kez Wang, Los Angeles
Alexander Ward, Santa Monica
Bailey Ward, Richmond
Katharine Warner, Sunland
S Warren, Long Beach
Diana Waters, Torrance
Melissa Waters, Laguna Niguel
Kim Waterson, Orange
Susan Watts, Riverside
Kerrie Weaver, Long Beach
Linda Webb, Rancho Palos Verdes
Merris Weber, Los Angeles
Ellen Webster, Claremont

Alan Weiner, Agoura Hills
Paul Weissman, Pasadena
David Wells, Northridge
Meghan Wells, Culver City
R Wells, Los Angeles
Amber Wheat, Torrance
Janet Wheeler, Murrieta
Shammi Whitaker, Valley Glen
Carol Wilehy, Victorville
Lee Willard, Whittier
Sheila Willens, Los Angeles
Mary Williams, San Francisco
Derek Williams, Inglewood
Shawn Wilson, Tujunga
Kaelah Wilson, Riverside
Tammy Wilson, Alta Loma
Leslie Winston, Alhambra
Theresa Winters, Sylmar
Patricia Wong, Yorba Linda
Christopher Wong, Irvine
Helen Wright, Dana Point
Cecilia Yanez, Lynwood
Francis Yang, Los Angeles
Aerie Young, Lake Forest
Shelley Zagars, Torrance
Thad Zajdowicz, Altadena
Jess Zelnik, Los Angeles
Jess Zelniker, Los Angeles
Anne Zerrien-Lee, Los Angeles
Helene Zimmerman, Santa Monica
Caroline Zuckerman, Newhall

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

COMMENTS SUPPORTING PAR 1111 AND PAR 1121 (Continued)

- Petition submitted by Aura Vasquez signed by the following members and constituents to support clean air standards and strengthen PARs 1111 & 1121:

| | |
|---------------------------------------|----------------------------------|
| Abbreail Navarro, Vallejo | Jessica Sanchez, Palm Desert |
| Jerry Rivers, Roosevelt | Mercedes Medina, Moreno Valley |
| Julian Hollinger, Houston | Elizabeth Fuentes, Perris |
| Cesar Hurtado, Hemet | Rachel von Landsberg, Redlands |
| Alejandra Ruiz, Ontario | Juliana Leonardo, Highland |
| Julieta Fuentes, Riverside | Billy Boyle, Costa Mesa |
| Oyuki Ramirez, Menifee | Diane Mendoza, La Habra Heights |
| Randi Walseth, Riverside | Arturo Sanchez, Rancho Cucamonga |
| Stephen Jones, Riverside | Lisa Tate, Pomona |
| Christine Martin, Riverside | Lavina Blossom, Riverside |
| Deanna Hesford, Temecula | Dhruv Gupta, Ladera Ranch |
| Vivian Bermudez, Riverside | Sarah Carbiener, Valley Village |
| David Dobson, Riverside | Stephanie Cardenas, Riverside |
| Mary Rider, Idyllwild | Tia Taffer, Vienna |
| Pamela Cobb, Winchester | Jose Aburto, Riverside |
| Kevin Kearney, Sun City | Lidia Gitlin, Villa Park |
| Gissell Morfin, Bloomington | Daniela Portillo, Corona |
| Kimberly Hodgson, Murrieta | Janet Weil, Palm Desert |
| Cheryl Miller, Murrieta | Cathy Kita, Perris |
| Michelle Davidson, La Quinta | Kim Anderson, Menifee |
| Diana Jackson, Hemet | Mary Bobbio, Glendale |
| Jenny Valenzuela, La Quinta | Paul Wolf, Bloomington |
| Cathryn Huffine, Beaumont | Alma Hernandez, Riverside |
| Angie Torres, Riverside | Kayvon Murphy, Moreno Valley |
| Rebecca Delgado, Riverside | Ande Siegel, Riverside |
| Tyra-Colette Sainte-Claire, Riverside | Scott Ford, Palm Desert |
| Louise Emershaw, Moreno Valley | Lauren Adamson, Riverside |
| Angela Muhammad, Lake Elsinore | Sitara Dickson, Murrieta |
| Jam Miller, Corona | Helena Davies, La Quinta |
| Lisa Labowskie, Palm Desert | Christopher Ibarra, San Jacinto |
| Justin Giuliano, Palm Springs | Cherue Hunter, Menifee |
| Emileanno Ramon Cross, Cerritos | Elaine Floyd, Desert Hot Springs |
| Nailejhcia Crawford, Riverside | Pamela Jacobs, Murrieta |
| Hunter Koss, Riverside | Justin Seago, Tahoe City |
| Diane Sbardellati, Nuevo | Jonathon Fletcher, Riverside |
| Kim Boehler, Riverside | Louise Emershaw, Moreno Valley |
| Danielle Delgado, Rialto | Laurel Rudy, Menifee |
| Karina Heers, Riverside | Marisol Leon Padilla, Riverside |

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- Petition submitted by Aura Vasquez signed by the following: (Continued)

Debra Jacobson, Palm Springs
Annette McDonald, Fontana
Wendy Walker, Cathedral City
Theo Taffer, Vienna
Jacqueline Esquivel, Riverside
Melanie Queponds, Sun City
Michelle Anaya, San Bernardino
Robin Lakin, Riverside
Kathleen Garland, Riverside
Jorge Rodriguez, Hayward
Miriam De La Cruz, Riverside
Laura Herrmann, Redlands
Joan Mariette, Rosemead
Bobbie Davis, Banning
Precious Reese, Hemet
Judy Torres, Temecula
Angel Hernandez, Moreno Valley
Burt Level, Palm Springs
Meg Bane, Palm Springs
Liza Quinlan, Moreno Valley
Nancy Schelling, Desert Hot Springs
Nicolette Moore, Irvine
Katy Butler, Chicago
Linsey Sutherland, Oakland
Victor Escobar, Cathedral City
Rhetta Alexander, Van Nuys
Karen Munsonfranklin, Cathedral City
Calvin Castero, Riverside
Lorian Dunlop, Murrieta
Alexander Irvine, Palm Springs
Sandra Langson, La Quinta
Bryna Silverman, Palm Desert
Barbara Mannering O'Shea, Menifee
Joanna Kawatra, Carson
Guadalupe Gonzalez, Los Angeles
Stephen Shaffer, Riverside
Kenya Gray, Riverside
Tina Marie Tavares, Indio
Satrah Anuket Henderson, Hemet
Linda Peterson, Indio

Linda Brown, Murrieta
Valerie Driscoll, Desert Hot Springs
Roberta Larsen, La Quinta
Holly Santistevan, Menifee
Crystal Cody, Whittier
Cristina Robleto, Yucca Valley
Kristen Olson Stone, Palm Desert
Dayana Hernandez, Riverside
Rachel Williams, Riverside
Amanda Mart, Cathedral City
Nikte Hernandez, Corona
Amy Ali, Corona
Tamara Halvorson, Palm Desert
Adrian Sanchez, Riverside
Laura Cerda, Lake Elsinore
Barbara Guariglio, Corona
Evangelina Ferguson, Adelanto
Rebekah Mansour, Riverside
Andres Estrada, Perris
Gabrielle Ramos, Upland
Cynthia Loza, Riverside
Delaney Chaffee, Moreno Valley
Ellen Baer, Riverside
Ray Garcia, Riverside
Marissa Lerma, Coachella
Jean Diaz, Riverside
Cathy Barber, Desert Hot Springs
Nancy Salazar, La Quinta
Kathy Beck, Palm Springs
John Eaton, New York
Ray Uriarte, Murrieta
Cindy Marrison, Temecula
Richard McCurdy, Thousand Palms
Yvonne Jensen, Rancho Mirage
Valezka Pennington, Lake Elsinore
Barbara Dean, Moreno Valley
Leslie Grafstrom, Riverside
Mary Stam, Idyllwild
Anne Judd, Winchester
Evelyn Lugo, Riverside

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- Petition submitted by Aura Vasquez signed by the following: (Continued)

Dana Tillman, Palm Springs
Linda Gardella, Sun City
Megan Long, Palm Desert
Gaeney Willmore, Murrieta
Melissa Hamilton, Anza
Darylla Flores, Corona
Elena Hernandez, Menifee
Jessie Morales, Desert Hot Springs
Gwenne Castor, Riverside
Drema Jorgensen, Riverside
Jeovanna Ayala, Brawley
Jason Darr, Corona
Deb Franchio, Cathedral City
Jennifer Perret, Temecula
Donna Hebert Pfeiffer, Riverside
Michelle Mastrangelo, San Jacinto
Rachel Garcia, Riverside
Brina Simon, Palm Springs
Laura Magdaleno, Riverside
Debbie Noble, Temecula
Joshua Pounds, Riverside
Brittney Bubb, Mentone
Evangelin Avila, La Verne
Rj Alexander, Riverside
Beth Levario, Riverside
Stephanie Ambriz, Coachella
Oliver Najera, Riverside
Bre Herrera, Norco
Lilia Briones, Riverside
Mary Gardiner, Aguanga
Lynn Perantoni, Hemet
Mary Mcdowall, Cathedral City
Shirley Hadley, Cathedral City
Jessy Maldonado, Murrieta
Joe Licavoli, Lake Elsinore
Kay Cole, Los Angeles
Hilary Simonetti, Cathedral City
Patrice Mahoney, Corona
Nancy Tirio, Moreno Valley
Nicollette Daniel, Desert Hot Springs
Denise West, Crestline
Kim Orbe, Los Angeles
Bianca Gamez, Desert Hot Springs

Megan Marrella, Palm Springs
Constance Alexander, Danville
Emmanuel Vazquez, Indio
Roman Lopez, Rialto
Aditi Thanekar, Riverside
Vanderlan Kelly, Claremont
Geraldyn Motto, Laguna Woods
Chiara Palagi, Riverside
Rai Molina, Slemp
Brianna Williams, Eastvale
Adrian Rivera, Riverside
Antonio Ramirez, San Bernardino
Jorge Cervantes, San Bernardino
Travis Beck, San Jacinto
Joyti Dutt, Barstow
Luis Fernando Guzman, Rancho Cucamonga
Sabrina Perez, Bloomington
Leticia Herrera, Fontana
Delilah Giber, Hesperia
Rene Tauro, Colton
Steve Salazar, Rialto
Ashley Camacho, Colton
Fe Gonzalez, Indio
Naethon Fonseca, San Bernardino
Laura Fernandez, Moreno Valley
Nick Edgar, Fontana
Victoria Vang, Eastvale
Antonio Lara, Colton
Evelyn Sanchez, Moreno Valley
Dania Juarez, Rialto
Priscilla Razura, Chino
Laura Aban, Coachella
Martha Delgado, Menifee
Dan Gaudette, San Diego
Yunuen Trujillo, Riverside
Loretta Bourget, Hemet
Denise Garcia, Rancho Santa Margarita
Paula Givens, Rialto
Jazmine Padilla, Perris
Miguel Davalos, Fontana
Joanna Parra, San Jacinto
Michael Hayman, Corona
Lara De Ann, Indio

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- Petition submitted by Aura Vasquez signed by the following: (Continued)

Mary Fifield, San Diego
Azarely Bedolla, Riverside
Xochitl Pedraza, Bloomington
Aries Lewis, San Bernardino
Melinda Lauriano, Corona
John Frazier Sr, Riverside
Chikako Takeshita, Riverside
Martha Aragon, Ontario
Timothy Curran, Big Bear City
Patricia Michael, Riverside
Camila Gordillo, Fontana
Carol Wiley, Victorville
Lilia , Moreno Vallejo
Samuel Koosed, Riverside
Lilia Munoz, Riverside
Guadalupe Gonzalez, Jurupa Valley
James Swingle, Chino Hills
Julie Tierney-Marquez, Indian Wells
David Hydro, Perris
Deborah Favorite, Desert Hot Springs
Carmen Banks, Jurupa Valley
Alan Robinson, Palm Desert
Erika Mancilla, Indio
Deanna Dreweatt, La Quinta
Trudy Taylor, Lake Elsinore
Jorge Valenzuela, Chino Hills
Anuar Uribe, Tustin
Debbie Gilcrease, Desert Hot Springs
Samm Starr, Palm Springs
Wendy Carrillo, Riverside
Reginald Best III, Palm Springs
Julianne Handlon, Riverside
Tracy Coxsmith, Grovetown
Alex Heyman, Fontana
Jill Elaine Young, Norco
Cori Robertson, San Dimas
Sarah Knight, Riverside
Kristy Johnson, Moreno Valley
Eva Anderson McCuiston, Lakeview
Barbara Young, Corona
Kathleen Morris, Palm Desert
Laura Loaiza, Indio
Dorothy Castillo, San Jacinto

David Miller, Palm Springs
Romey Rivas, Palm Desert
Marsha Morgan Medina, Moreno Valley
Kylie High, Palm Desert
Michael Canhoto, Buena Park
Diane Williams, Hemet
Jason Senecal, Temecula
Serita Romo, Wildomar
Inez Sparrow, Moreno Valley
Denise Garcia, Rancho Santa Margarita
Johanna Andela, Hemet
Keegan Arnt, Riverside
Robert Schuckert, Palm Desert
Ruby Luevano, Riverside
Trinity Orton, Apple Valley
Kilian Frenzel, Kokomo
Evangeline Martinez, Palm Desert
Mary Roche, Palm Springs
Christian Napuli, Glendale
Daisy Lara, Hemet
Kyrrie Gutierrez, Riverside
Richard Roman, Ontario
Emily Ramirez, Colton
Yoslin Huerta, San Jacinto
Michael Zepeda, San Bernardino
Osvaldo Gonzalez, San Bernardino
Jesus Lopez, Ontario
Valeria Agurto, Fontana
Mayra Silva, Corona
Marlet Felix, Fontana
Tracey Manjarrez, Morongo Valley
Andrew Zambrano, San Bernardino
Edgar Lope, San Bernardino
Chris Castaneda, Ontario
Mari Torres, San Bernardino
Charley Duung, Rialto
Marissa Rodriguez, Rialto
Kevin Zaragoza, Highland
Naydeline Blanco, Mira Loma
Casey Cardenas, Fontana
Gabriel Rodriguez, Fontana
Brenda Franco, Coachella
Joe Rico, Palm Desert

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- Petition submitted by Aura Vasquez signed by the following: (Continued)

| | |
|---------------------------------|---|
| Karen Smith, Atwater | Darcy Duff, Hemet |
| Christina Creiglow, La Quinta | , San Bernardino |
| Mike Anderson, Murrieta | Alex Morgan, Riverside |
| Emmelyn Navarro, Moreno Valley | Betsy Roberts, Norco |
| Kathryn Curtis, Riverside | Loren Ojeda, desert hot springs |
| Patricia Escarcega, San Jacinto | Patrick McGaugh, Riverside |
| Amriael Flores, San Jacinto | Kimberly Monnette, Eastvale |
| Marla Armstrong, Riverside | Christie Radu, Bermuda Dunes |
| Ila Bratlien, Palm Desert | Susie Valle, Tijuana |
| Ray Uriarte, Murrieta | Marcie Cross, Cathedral City |
| Yesenia Ramos, Rialto | Sheri Arras, Desert Hot Springs |
| Cecilia Su'a, Carson | Francisco Osornio Méndez, Gavilan Hills |
| Hortensia Rosales, Rialto | Mo Rodgers, Los Angeles |
| Lizzet Pineda, Riverside | Erika Garcia, Riverside |
| Maria Ramirez, Rialto | Shirley Lilly, Riverside |
| Patricia Wyatt, Redlands | Michelle P., Temecula |
| Adelina Hernandez, Riverside | P. Scott, Norco |
| Rosa Velazquez, San Bernardino | Amelia Garcia, Corona |
| Ben Joseph, Los Angeles | Maria Ortega, Moreno Valley |
| Simone Fonseca, Victorville | Juliet Albertson, Desert Hot Springs |
| Elena Martinez-Hall, Riverside | Christine Gallagher, Palm Springs |
| Cesar Salgado, Riverside | Riki Luri, Yucca Valley |
| Fernando Dorantes, Riverside | Tiffany North, Vista |
| Alma Bobadilla, Rialto | Sherrilyn Racey, Corona |
| Valeria Aquino, Riverside | Isadora Alman, Cathedral City |
| Maribel Madrid, Riverside | Shannon Pesantes, Calimesa |
| Alan Robinson, Palm Desert | Vanetta Jones, San Bernardino |
| Jason Pol, Beaumont | Ricardo Gonzalez, San Bernardino |
| Ray Uriarte, Murrieta | Ashelee Salvatierra, San Bernardino |
| Roy Mathews, Banning | Michael Mora, San Bernardino |
| Chela Lopez, riverside | Siggifredo Aguilar, Los Angeles |
| Ryn G, Coachella | Marilyn Huatro, Hesperia |
| Aaron Oliverio, San Bernardino | Joseph Wagner, Barstow |
| Leslie Bogendymment, Hemet | Octavo Garcia, Lucerne Valley |
| Kurt Weissenbach, Moreno Valley | Zayneth Flores, San Bernardino |
| Yaqui Cortez, La Quinta | Lizbeth Marel y Felix, Fontana |
| Ryan Kepp, Pomona | Edgar Rolon, Colton |
| Maria Aguilar, Riverside | Queen Warner, San Bernardino |
| Luisa Rubinstein, Los Angeles | Nancy Zaragoza, San Bernardino |
| Amelie Boissinot, Palm Springs | Michelle Abril, Ontario |
| Mary Moore, Desert Hot Springs | Jonathan Vazquez, Colton |
| Mark Gray, Spring Valley | Samantha Pena, Coachella |
| Rosie Horn, Mohave Valley | Sam Campos, San Bernardino |

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- Petition submitted by Aura Vasquez signed by the following: (Continued)

| | |
|--|--|
| Jacob Rodriguez, San Bernardino | Rosa Reynoso Chilera, Corona |
| Susan Felix, Rialto | Sean Ortega, Chula Vista |
| Alejandra Juarez, Colton | Marina Brown, Hemet |
| Angelena Montes, San Bernardino | Juan Carlos Sanchez, California |
| Mauricio Naranjo, Riverside | Rosalie Galvan, rialto |
| Daniella Rodriguez, Indio | James Mank, Perris |
| Salvador Jimenez, Fontana | Doneila Abril-Zoglmann, Redlands |
| Angel Ramirez, San Bernardino | Karely Arlon, Murrieta |
| Rafael Iniguez Zazueta, San Bernardino | Ana Gonzalez, Rialto |
| Sandra Lanham, La Quinta | Marissa Willman, Bermuda Dunes |
| Gerald Prostitis, Riverside | Mily Iglesias, Cudahy |
| Ana Cadena, Palm Desert | Christina Moore, SAN BERNADINO |
| Jose Mendoza, Torrance | Martha Avilaj, Riverside |
| Cynthia Ney, Banning | Terri Rendina, Palm Desert |
| Jessica Nanez, Menifee | Ricky Sierra, Rancho Cucamonga |
| Rob Jones, Riverside | Kinty Cachimuel, Otavalo |
| Deshawnaye Dennis, San Jacinto | Alejandra Cardona, Thermal |
| Stepanie Bennett, Menifee | Krista Coulstring, Lake Elsinore |
| Fanelly Millan, Ontario | Sandra Felix, Indio |
| Mirna Ruiz, Rialto | Jennifer Masterson, Desert Hot Springs |
| Tatiana Reyes, Rialto | Tom Oates, La Quinta |
| Dan Hoxworth, Riverside | Tina Gass, Hemet |
| Maria Galvan, Ontario | Sandra Martinez, Riverside |
| Roddy Jerome, Santee | Raymond Winters, Riverside |
| Guadalupe Miranda, Fontana | Diana Gonzalez, Riverside |
| Rachel Deaton, Los Alamitos | Mariana Angeles, Riverside |
| Veronica Jimenez, San Bernardino | Atilano Ramirez Jr., Moreno Valley |
| Laura Diaz, Bloomington | Peter Mazon, Riverside |
| Samantha Melendez, Long Beach | Angelica Hernandez, Encinitas |
| Luz Espinoza, Riverside | Imelda Diltz, Temecula |
| William Funderburk, Los Angeles | Carolyn Coy, Beaumont |
| Tatiana Flores, Moreno Valley | Frank Osley, Perris |
| Rosalba Brambila, San Bernardino | Maria Vittorie, La Quinta |
| Bryant Aquino, Riverside | Reginald Gleichner, Cordova |
| Robert Betancourt Junior, Hemet | Gloria Campos, Calimesa |
| Rolando Cadiz, Riverside | Johnny Bladow, San Jacinto |
| Ed Murphy, Corona | Marisol Felix, San Bernardino |
| Maria Davis, Cherry Valley | Rosa Ontiveros, San Bernardino |
| Maria Rodriguez, indio California | Aurora Reyes, San Bernardino |
| Mara Costo, Anza | Freddy Murillo, Vista |
| Robert Newman, Riverside | Lucia Medina Manzano, Bloomington |
| Traci Geer, Canyon Lake | Luis Gonzalez, Moreno Valley |
| Alfredo González, Thermal CA . | Andrea Antonio, San Bernardino |

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- Petition submitted by Aura Vasquez signed by the following: (Continued)

| | |
|-----------------------------------|---|
| Vanessa Pompa, Indio | Rosalie Foy, Redlands |
| Isabel Zavala, Barstow | Donna Graham, Jurupa Valley |
| David De Alba, Riverside | Carol Moyer, Grand Terrace |
| Cristina Villegas, Fontana | Traci Nelson, Phoenix |
| Ronnie Castillo, Fort Irwin | Blanca Olivares Lopez, San Bernardino |
| Ella Cruz, Cedarpines Park | Wesley Crook, Colton |
| Katelyn Repass, Corona | Carol Wilson, Colton |
| Janelle Guardado, Fontana | Geraldine Blair, Gardena |
| Emily Manuel, Rialto | Jesus Rochin, Riverside |
| Elisayra Alvarez, San Jacinto | Janet Espinoza, Huntington park |
| Griselda Padron, Phelan | Diane Pisano, Meniffee |
| Marylin Docantes, Moreno Valley | John Kirk, Pasadena |
| Melissa Garcia, Fontana | George Silva, Ontario |
| Sofia Corona, Loma Linda | LaQuecia Weaks, Hemet |
| Jesus Martinez, Fontana | Felix Silva, Duarte |
| Yocelyn Tapia, Rialto | Angelica Escobar, Lake Elsinore |
| Estephani Monroy, Hesperia | Patricia Padua, San Bernardino |
| Guadalupe Gonzalez, Los Angeles | David A., Rialto |
| Michelle Manesse, Riverside | Rosa Angelica Aguirre-Mendoza, Highland |
| Harlo Lenning, Hemet | Jacqueline Castillo, Los Angeles |
| JB Mendonca, Riverside | Sumi Hwang, Anza |
| Araceli Padilla, Riverside | Erica Inzunza, Los Angeles |
| Diane De Baun, Hemet | Marcia Slater Hatfield, Palm Desert |
| Deborah Sue Barela, Hemet | Marissa Lerma, Coachella |
| Rupert Lofton, Jurupa Valley | Lydia De La Rosa, Grand Terrace |
| Dena White, Riverside | Sharon Spies, Tucson |
| Cathy Kelly, Meniffee | Andrea Walker, Adelanto |
| Ayanna Delk-Lewis, Sun City | Tami Blalock, Truckee |
| Rosa Hunt, Carlsbad | Thomas Smith, Lake Elsinore |
| Lecie Meyers, Temecula | Nayeli Valdez Ramirez, Santa Ana |
| Claudia Gutierrez, San Bernardino | Heron Carrillo, Rialto |
| Stephen Anderson, Jurupa Valley | William Attaway, Riverside |
| Maria Arvizu, Corona | Trasila Nava, Moreno Valley |
| Natalie Middleton, Chula Vista | Macuilt0chtli Medina, Rialto |
| Samuel Rodriguez, Highland | Toni Vittorie, La Quinta |
| Elvia Medina, San Bernardino | Bobbie Maxwell Larsen, Palm Desert |
| Tina Silva, Ontario | Matt Wallace, Hemet |
| Travis Winn, Joshua Tree | Debbie McNeal, Temescal Valley |
| Indira Perez, Rialto | Karen Lehr, Meniffee |
| Natalie Espinoza, Fontana | Georgia Davis-Ireland, Scotts Valley |
| Maria Estrada, Colton | Brittany Chambers, Hemet |
| Dolores Guevara, San Bernardino | Marnice Smith, Meniffee |
| Clarissa Aquino, Riverside | Amando Asperas, Perris |

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- Petition submitted by Aura Vasquez signed by the following: (Continued)

Rose Hemings, Big Bear Lake
Muminah Nolley, Moreno Valley
Crystal Ahumada, Perris
M Davalos, Fontana
Talia Abadjian, Riverside
Ingra Garrity, Winchester
Donna Sharp #, Apple Valley
Mary Gonzalez, Banning
Michael Juarez, Corona
Kathy Huston, Riverside
Michelle Glenn-King, Hemet
Virginia Rocha, Moreno valley
Loretta Bourget, Hemet
Valerie Masi, Indio
Robert Sackett, Temecula Ranchos
George Dyke, Palm Springs
Dennis Gourley, Riverside
Rupert Macnee '69, Palm Desert
Denise Lucero, Norco
Ed Gauna, Palm Springs
Paula Tufano, Palm Springs
Eka Dev Sharma, Anaheim
Patricia Flores Zepeda, San Diego
Jesus Ybarra, Avondale
Evelise Batiz-Figueroa, Temecula
Connie Oliveira, Indio
Ginny Rund, Meniffee
Jorge Rodriguez, Bloomington
Brian Miller, Temecula
Carole Thomas, Sacramento
Karen Whitaker, Bermuda Dunes
Johnny Torres, Chino
Charles Dietrich, Corona
Alfred Edwards, La Quinta CA. 92253
James Sales, Idyllwild
Misty Clark, Winchester
Domenique Jackson, Corona
shaheen bahrami, San Jacinto
Kristina Godwin-Munoz, Crestline
Michael Berglund, Riverside
Maritza Iñiguez Bailón, Mecca
Janice Harpole, Palm springs
Cynthia A Martinez, Desert hot springs

Elena Garcia, Moreno Valley
Amicha Flores, San Jacinto
Bea Lopez, Banning
Veronica Serrato, Riverside
Penelope Thompson, Hemet
Lisbeth Elizarraras, Coachella
Steve West West, Mira Loma
Jennifer Perez, Perris
Nancy Tirio, Moreno Valley
Mardie Rodriguez, Riverside
Juanita Mendoza, Coachella
Jenitha Lofton, Jurupa Valley
Sandy Marquez, Lake Elsinore
Miggy Ocon, Coachella
Patrick Magee, Cathedral City
Akalos Elyon Luxaria, Los Angeles
Bertha Morales, Riverside
Michael Rodriguez, Redland
Azenath Aristocrat, Mission Viejo
Connie Blake, Riverside
stella Boone, Blythe
Dean Simmons, Palm Springs
Rich Delgado, Meniffee
Lizbeth Veglahn, Lake Elsinore
Lori O'Neill, Riverside
Ermeinda Rayos, La Puente
Casey Strachan, Palm Springs
Wendy Jackson, Temecula
Bertha Payan, Moreno Valley
Beatrice Lowe, Corona
Carlos Tenorio, Fontana
David S. Prince, Riverside
Michael Ware, Murrieta
Cheryl Putnam, Jurupa Valley
Jan Rico, Palm Desert
Johnny Bladow, San Jacinto
James Ford, Corona
Patty Brogi, Palm Springs
Charlie Ball, Indio
Shaul Rosen-Rager, Hemet
Shirley Aragon-Fierro, Riverside
Iris Kilthau, Hemet
Cherie Hunter, Meniffee

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- Petition submitted by Aura Vasquez signed by the following: (Continued)

Barbara Bowen, San Ramon
Gloria Webster, Menifee
Evelyn Coleman, Riverside
Sylvia McNeal, Canyon Lake
Mario Arteaga, Perris
Brooke Swingle, Chino Hills
Virginia Jessica, Pinon Hills
Sheron Garcia Bridge, Placentia
Cinnamon Haro, San Bernardino
Daniel Lopez, San Jacinto
Oscar Casas-Barajas, Corona
Keegan Wood, Calimesa
John Mardoian, Rancho Mirage
Laura Massey, Murrieta
Rina Boschetti, Riverside
Gregory Wilson, Oxnard
Gary Davis, Long Beach Ca 90804
Sharon Lee, Moreno Valley
Enrique Sanchez-Harrison, Norco
Eva Carrillo, Indio
Marai Ramirez, Moreno Valley
Sylvia Noriega, Indio
Deborah Skews-Stone, Riverside
Donna Schultz, Hemet
Bev Shichtman, La Quinta
Jamare Morris, Murrieta
Regina Lara, Hesperia
Brian McNeil, Inglewood
Lindsay Sullivan, Desert Hot Springs
Melinda Weinrich, Riverside
Danny,***@gmail.com, Riverside
Gabriela Gomez, Riverside
Monica Gallegos, Riverside
Debra Mancuso, Newport Beach
Brenda Higuera, Perris
Lydia Bantilan, Jersey City
Richard Cole, Cathedral City
C Trae Zauner-Rogers, Riverside
K Jones, Saint George
Mark Bombek, Apple Valley
Jennifer Johnson, Yucca Valley
Melissa Delia, San Jacinto
Gayla Griffith, Lucerne Valley

Amanda Garcia, Riverside
Alex Irvine, Palm Springs
Christina M. Johnson, Chico
Marina Rey, Coachella
Elizabeth Sanchez, Nuevo
Shirleen Law, Palm Springs
Brenda Bryant, San Bernardino
Ned Scott, Norco
Teri Friend-Schlemmer, Hemet
Jon Davis, Hesperia
John Day, Menifee
Andrea Camarillo, 92571
Vivienne Kredenser, Cathedral City
Vicky Welsh-Morales, Palm Desert
Antonia W. Mengler, Hemet
Nancy Larsen Rhoads, San Diego
Lisa Isbell, Indio
Charlotte George, Perris
Chris Davies, Riverside
Gabrielle Rodgers, Menifee
Rocio Orozco, Covina
Claudia Chavez, Adelanto
Judy Ann Castelli Isaacson, Riverside
Stina Marie, Murrieta
Scharlett Vai, Riverside
Paula Stephan, Anza
Katrina Smith, Southgate
Kathy Beck, Palm Desert
Donna gavin, Menifee, calif
David McCalla, Riverside
Susan Yeager, Hemet
Richardo Richardson, riverside
Kathie Perry, Palm Springs
CHRISTINA Moore, SAN BERNADINO
Susana Araoarao, Ontario
Monica Sloatizki, Yucca Valley
Teresa Sandoval, Temecula
Maggie Tarelo, Perris
Ms Fabiola valo, hesperia
John Morris, Palm Desert
David Hinds, corona
Daniella Torres, Pomona
christy Collins, adelanto

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- Petition submitted by Aura Vasquez signed by the following: (Continued)

| | |
|--|---------------------------------------|
| Yusbani Hernandez, riverside | Crystal Kauffman, Victorville |
| Bianca Gamez, San Bernardino | Joe Bido, Banning |
| Thomas Lescinski, Cathedral City | Jacqueline Castillo, Bell Gardens |
| Lucrecia Savedra, Riverside California | Virginia Herrera Favela, Las vegas NV |
| Joe Perez, San Bernardino | Barbara Collins, Hesperia |
| Issis Zepeda, Riverside | Tiger Lily Bennett, Adelanto |
| Armando Chavez, Corona | Cheryl Dent, Moreno Valley |
| Cheryl Hobbs, San Jacinto | Susie Valle, Riverside |
| Kayla Bochenek, Menifee | Rocio Rodriguez, Riverside |
| Shawn Aceves, Menifee | Sheryl Hamblin, Hemet |
| Richard Camp, San Bernardino | Joset Castaneda Lemus, Beaumont |
| Breanna Davis, Barstow | |
| Lisa Ortiz, 92376 | Aurora Reyes, 92407 |
| Joel Lopez, 92376 | Michael Mora, 92407 |
| Miguel Muniz, 92316 | Antonio Ramirez, 92407 |
| La Courtney Griffin, 91730 | Richard Roman, 91762 |
| Maya Pireda, 92316 | Freddy Murillo, 92084 |
| Helen Montano, 92335 | Siggifredo Aguilar, 90037 |
| Toni Sanchez, 92316 | Jorge Cervantes, 92405 |
| Mani Kang, 92879 | Emily Ramirez, 92324 |
| Breanna Davis, 92507 | Lucia Medina Manzano, 92316 |
| Mayte Pireda, 92316 | Noah Hernandez, 92400 |
| Helen Monte, 92316 | Marilyn Huatro, 92345 |
| Marceliuo Flores, 92316 | Travis Beck, 92583 |
| Helen Castillejos, 92316 | Yoslin Huerta, 92583 |
| Maria Elena Helz, 92316 | Luis Gonzalez, 92553 |
| Ulysses Mora-Rodriguez, 92407 | Joseph Wagner, 92311 |
| Marcelio Flores R, 92316 | Joyti Dutt, 92311 |
| Maria Elenahelz, 92316 | Michael Zepeda, 92404 |
| Joanna Parra, 92583 | Robert Boavo, 91286 |
| Henry Parra, 92583 | Andrea Antonio, 92404 |
| Vanetta Jones, 92404 | Octavo Garcia, 92356 |
| Rai Molina, 41763 | Luis Fernando Guzman, 91730 |
| Christian Kyle Napuli, 91205 | Daniel Gallardo, 42592 |
| Marisol Felix, 92404 | Osvaldo Gonzalez, 92404 |
| Ricardo Gonzalez, 92404 | Elvia Aguirre, 92909 |
| Brianna Williams, 92880 | Vanessa Pompa, 92201 |
| Daisy Lara, 92544 | Zayneth Flores, 92405 |
| Rosa Ontiveros, 92404 | Sabrina Perez, 92316 |
| Ashelee Salvatierra, 92404 | Jesus Lopez, 91762 |
| Adrian Rivera, 92501 | Isabel Zavala, 92311 |
| Kyrsrie Gutierrez, 92501 | Lizbeth Marel y Felix, 92335 |
| | Leticia Herrera, 92335 |

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- Petition submitted by Aura Vasquez signed by the following: (Continued)

Valeria Agurto, 92335
David De Alba, 92507
Edgar Rolon, 92324
Delilah Giber, 92345
Mayra Silva, 92883
Cristina Villegas, 92335
Jasmine Duanne, 92507
Queen Warner, 92411
Rene Tauro, 92324
Anthony Castro, 91261
Marlet Felix, 92335
Ronnie Castillo, 92310
Nancy Zaragoza, 92405
Dante Ramirez, 99236
Steve Salazar, 92377
Tracey Manjarrez, 92256
Ella Cruz, 92322
Michelle Abril, 91762
Ashley Camacho, 92324
Andrew Zambrano, 92410
Katelyn Repass, 92883
Jonathan Vazquez, 92324
Fe Gonzalez, 92201
Edgar Lope, 92407
Junior Alvarez, 92583
Angie Gomez, 92819
Janelle Guardado, 92335
Samantha Pena, 92236
Nelba Figuerroa, 92476
Naethon Fonseca, 92407
Chris Castaneda, 91762
Emily Manuel, 92376
Sam Campos, 92404
Laura Fernandez, 92553
Mari Torres, 92411
Elisayra Alvarez, 92583
Jacob Rodriguez, 92411
Nick Edgar, 92335
Charley Duung, 92376
Griselda Padron, 92371
Susan Felix, 92376
Victoria Vang, 92880
Marissa Rodriguez, 92376

Marylin Docantes, 92553
Junior Alvarez, 92583
Alejandra Juarez, 92324
Antonio Lara, 92324
Kevin Zaragoza, 92346
Melissa Garcia, 92336
Angelena Montes, 92407
Jasmine Rosas, 92367
Evelyn Sanchez, 92557
Naydeline Blanco, 91752
Jonathan Vazquez, 92324
Sofia Corona, 92354
Mauricio Naranjo, 92503
Dania Juarez, 92376
Ayanna McAlister, 92355
Casey Cardenas, 92335
Jesus Martinez, 92335
Daniella Rodriguez, 92201
Priscilla Razura, 91710
Gabriel Rodriguez, 92337
Yocelyn Tapia, 92376
Salvador Jimenez, 92335
Laura Aban, 92236
Brenda Franco, 92236
Estephani Monroy, 92345
Angel Ramirez, 92410
Marco Westland, 92399
Chris Robles, 91761
Karen May, 91764
Stephanie Liggin, 92404
Taria Azim, 92338
James Alber, 92404
Sarah Gardam-Thomas, 92333
Dianne Landeras, 92372
Lorraine Ennque, 92313
Ryan Schansrim, 92354
Maria Argulello, 91710
Jeffery Mio, 91709
Nancy Glem, 92407
Ulysses Moa, 92407
Ralph Lewis, 91786
Martina Rangil Ortiz, 91762
Crisol Mena, 91763

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- Petition submitted by Aura Vasquez signed by the following: (Continued)

Tori Gollget, 91709
Kaly Gallaher
Jeffry UmañaMuñoz, 92405
J. Bedella, 92503
Rene Valdez, 92107
Jacqueline Devine, Blythe
Sharon Spratling, Rancho Mirage
Kathleen Carpenter, Palm Desert
Bruce Mcdannold, Palm Springs
Michael Miller, Palm Desert
Allen Freiman, La Quinta
Mark Powell, Palm Springs
Jon Gilbert, Palm Springs
William Buffalo, Cathedral City
John Westerkamp, Palm Springs
Thomas Dreher, Rancho Mirage
Jeffrey Wright, Cathedral City
Linda Williamson, La Quinta
Judith Billson, Desert Hot Springs
Sharon Brooks, Cathedral City
Calvin Dalke, Riverside
Lucia Gill, Riverside
Janice Mack, Riverside
Donald Bilby, Palm Springs
Sharon Perica, Palm Desert
Jose Alvarez, Thermal
Shelley Alexander, Mountain Center
Stella Rios, Riverside
Peggy Neiman, Riverside
Steven Welton, Riverside
Olivia Grossman, Riverside
Richard Roth, Riverside
Roxanne Longtin, Riverside
Edward Bazylewicz, Riverside
Sarah Hall, Riverside
Rafael Rojas, Riverside
Mary Lotz, Riverside
Sergio Sanchez, Riverside
Phillip Pitchford, Riverside
Jerald Hare, Riverside
Janice Leger, Riverside
Linda Ridgway, Riverside
Heather Beliveau, Riverside

Yadira Alvvarado, 92509
Sheila Barton, Palm Desert
John Green, Rancho Mirage

Jeannie Yack, Indio
Robert Quest, Rancho Mirage
Thomas Peterson, Rancho Mirage
Sandra Espinoza, Riverside
John Wold, Palm Springs
Linda Sharp, Riverside
Nina Izsak, Rancho Mirage
Rosemary Mendez, Indio
Kevin Mack, Coachella
Penny Floyd, Palm Desert
Maria Mata, Rancho Mirage
Ruben Rosales, Cathedral City
Rochelle Leonard, Indio
Estella Jimenez, Indio
David Koslow, Cathedral City
Elma Villarreal, Coachella
Sandra Baca, La Quinta

Cynthia Hatton, Riverside
Loretta Longoria, Riverside
Linda Addison, Riverside
Claude Hamilton, Riverside
Kenneth Kusudo, Riverside
Charles Rangel, Riverside
Cynthia Nolasco, Riverside
Samuel Meador, Riverside
Cynthia Hausteen, Riverside
John Campbell, Riverside
Kelly Krashin, Riverside
Bessie Miller, Riverside
Cynthia Powers, Riverside
Laurie Barnett, Riverside
Raymond Valencia, Riverside
Edward Martinez, Riverside
Miguel Ordonez, Riverside
Lupe Trujillo, Riverside
Sue Poirier, Riverside
Rose Thi, Riverside

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- Petition submitted by Aura Vasquez signed by the following: (Continued)

David Martinez, Riverside
John Valdez, Riverside
Cheryl Longerbeam, Riverside
Frank Lopez, Riverside
Sylvia Lopez, Riverside
Pauline Eckberg, Riverside
Norma Bartholomew, Riverside
Nancy Nasim, Riverside
Larry Utesch, Riverside
Lorilee Chandler, Riverside
Thomas Blasque, Riverside
Adrian Aldrich, Riverside
Tracy Lech, Riverside
Victor Solorzano, Riverside
Robert Patch, Riverside
Sheilah Bellew, Riverside
Pamela Obermeyer, Riverside
John Oross, Riverside
Katherine Myers, Riverside
Randell Carder, Riverside
Gregory Peek, Riverside
Eileen Baum, Riverside
Cathy Boston, Riverside
David Fontana, Riverside
James Sanders, Riverside
Sandra Denney, Riverside
Elliott Luchs, Riverside
Ace Waggoner, Riverside
Rita Kaye, Riverside
James Swartzel, Riverside
Dorothy Dixon, Riverside
Harriette Stuckey, Riverside
Portia Webb, Riverside
Ronald Robbins, Riverside
Deirdre Goeman, Riverside
Carolyn Staroba, Riverside
Robert Sanchez, Riverside
Michael Helinski, Riverside
Michael Gouveia, Riverside
Dolores Martinez, Riverside
Sharron Harris, Riverside
Donald Duncan, Riverside
Timothy Williams, Riverside

Maria Rodriguez, Riverside
Todd Wingate, Riverside
Steven Goodyear, Riverside
Jean Weiss, Riverside
Ellen Estilai, Riverside
Martha Moreno, Riverside
Michael Adams, Riverside
Harold Carpenter, Riverside
Barbara Keen, Riverside
Daniel Ozer, Riverside
Margaret Archambault, Riverside
Valerie Ford, Riverside
Joan Roberts, Riverside
Denise Jackson, Riverside
Irma Flores, Riverside
Steven Krakora, Riverside
Cynthia Johnson, Riverside
Suesha Warner, Riverside
Shirley Lemmons, Riverside
Marzban Amaria, Riverside
Louis Harper, Riverside
Nancy Lloyd, Riverside
Elvin Yeo, Riverside
Pamela Westbrook, Riverside
Kevin Mcclay, Palm Springs
Brenda Charles, Palm Springs
Elizabeth Cortez, Rancho Mirage
Wade Weaver, Palm Springs
James Myers, Riverside
Lynn Parazak, Rancho Mirage
Jon Barrist, Palm Springs
Ronald Morones, Cathedral City
David Thompson, Rancho Mirage
Patrick Leasure, Palm Springs
Gerardo Ramirez, Indio
Jose Pizarro, Mecca
Luther Holley, Blythe
Karen Shelby, Desert Hot Springs
John Johnston, La Quinta
Kathleen Riley, Palm Desert
Kirvin Satterwhite, Palm Springs
Mark Quesada, Palm Springs
Robert Lecesne, Palm Springs

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- Petition submitted by Aura Vasquez signed by the following: (Continued)

Walter Denton, La Quinta
Nellie Rios, Riverside
Yvonne Palencia, Riverside
Felix Padron, Riverside
Susanne Fleming, Riverside
Mark Stevens, Riverside
Sherrie Cross, Riverside
Elva Moya, Riverside
Paula Torres, Riverside
Larry Van Dam, Riverside

Anabel Rodriguez, Riverside
Josefina Clemente, Riverside
Debra Johnson, Riverside
Jennett Jones, Riverside
Amy Foody, Riverside
John Obrien, Riverside
Brian Stover, Riverside
Rebecca Lake, Riverside
David Eagle, Riverside
Willie Greer, Riverside

Pamela Webber, Riverside
Andrew Bodewin, Riverside
Susan Schilling, Riverside
Michael Tucker, Riverside
Michael Baumann, Riverside
Lonnie Judd, Riverside
Kenneth Ng, Riverside
Barry Reynolds, Riverside
Jackie Anderson, Riverside
Becky Salquist, Riverside
Janet Hudson, Riverside
Thomas Aguilar, Riverside
Jennifer Lara, Riverside
Jose Martinez, Indio
Scott Russell, Palm Desert
Sheri Scott, Riverside
Paul Edmonds, Desert Hot Springs
Victoria Bomberry, Riverside
Todd Faux, Riverside
Richard Maxfield, Cathedral City
Susan Markoski, Riverside
Kathy Huffman, Palm Springs
Dale Deneen, Palm Springs
Donald Peterson, Palm Desert
Valerie Houser, Blythe
Kathleen Dale, Palm Desert
Marcus Chavarria, Palm Springs
Lorelei Belk, Riverside
Mark Taylor, Riverside
Anita Goldsmith, Riverside
Patricia Iniguez, Riverside
Elizabeth Mojarro, Riverside

Roger Farson, La Quinta
Judith Greene, Palm Desert
Dixie Challes, Palm Springs
Sheryl Silver, Rancho Mirage
Jeffrey Weaver, Palm Springs
Gary Rhodes, Palm Springs
Athula Siriwardena, Riverside
Sandra Gonzalez, Riverside
Milagros Nelson, Riverside
Donald Botic, Riverside
Adrian Washington, Riverside
Leon Rosborough, Riverside
Lisa Lawless, Riverside
Irma Asberry, Riverside

Darko Bogdanovich, Riverside
Angela Gonzales, Riverside
Karen Marshalleck, Riverside
Dan Miulli, Riverside
Randi Walseth, Riverside
Lydia Nyaggah, Riverside
Wendy Marshall, Riverside
Jose Salazar, Palm Springs
Paul Foster, Palm Springs
Clifton Blair, Palm Desert
Irma Paredes, Riverside
Suzanne Roth, La Quinta
Julie Madsen, Indio
Sherry Kelly, Palm Desert
Robert Davis, Cathedral City
Thomas Rudolph, Cathedral City
Josephine Gonzalez, Coachella

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- Petition submitted by Aura Vasquez signed by the following: (Continued)

Laura Ewbank, Desert Hot Springs
Deborah Pierce, Indio
Chiyoko Gussin, Desert Hot Springs
Michael Coscetti, Desert Hot Springs
Lucina Estela, Desert Hot Springs
Pamela Riggs, La Quinta
Brian Ludington, Palm Desert
John Peccin, Palm Springs
Sylvia Escobedo, Palm Springs
Rose Coslett, Palm Springs
J Newton, Rancho Mirage
Andrew Trentacosta, Rancho Mirage
Juana Rodriguez, Riverside
Miller Smith, Riverside
Robert Hernandez, Riverside
Fidel Perez, Riverside
Steven Showalter, Riverside
Shirley Walker, Riverside
Carrie Miller, Riverside
Hector Martinez, Riverside
Adam Romero, Riverside
Maria Mejia, Riverside
Margaret Cantwell, Riverside
Brian Smith, Riverside
Alecia Curtis, Riverside
Gail Rice, Riverside
Stacy Avery, Riverside
John Divola, Riverside
Belinda Walker, Riverside
June Kidwell, Riverside
Todd Hoggan, Idyllwild
Phillip Tankey, Riverside
Michael Beam, Riverside
Linda Alvarez, Riverside
Alma Garcia, Indio
Martin Adelman, Desert Hot Springs
Janice Harrell, Palm Springs
David Lubienski, Rancho Mirage
Salvador Cabrera, Riverside
Ronda Graves, Riverside
Sharon Kessinger, Riverside
Timothy Hennessey, Riverside
Martha Carrillo, Riverside

Kurt Danko, Riverside
Gretchen Wooden, Riverside
Virginia Sullivan, Riverside
Maria Ortega, Riverside
Janice Delagrammatikas, Riverside
William Bailey, Riverside
Craig Freeman, Riverside
Edward Vanasco, Cathedral City
William Gillott, Palm Desert
Gregory Semos, La Quinta
Ricardo Bautista, Palm Desert
Patrick Cronin, Palm Springs
James Selby, Riverside
Anthony Vitulli, Riverside
Bonnie Bronson, Palm Springs
Alonzo Edwards, Palm Springs
Daniel Beeman, Palm Desert
Erlinda Sereno, Riverside
Myron Allen, Riverside
Michael Neto, Palm Desert
Cherie White, Palm Springs
John Minn, Riverside
Rhonda Taube, Riverside
Teri Andrews, Riverside
Edward Everett, Palm Springs
Margaret Rye, Riverside
Barry Cardiner, Palm Springs
Angel Borgetti, Coachella
Mark Mcferren, Riverside
Gary Etherton, Riverside
Ramona Molinar, Riverside
Annette Godwin, Cathedral City
Steve Webster, Mountain Center
Martha Juarez, Riverside
Sonya Huey, Riverside
Blanca Gonzalez, Riverside
Monica Bianchi, Palm Springs
Paula Ramos, Riverside
Jean Monarque, Indio
Daniel Lee, Palm Desert
Halee Knoefler, Riverside
Gregory Francis, Cathedral City
James Angone, Rancho Mirage

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- Petition submitted by Aura Vasquez signed by the following: (Continued)

Bernade Frazer, Riverside
Daniel Zamora, Indio
Laura Svolos, Palm Desert
Gregory Shaw, Riverside
Charlene Andrews, Indio
Avian Rogers, Cathedral City
Alisha Lott, Riverside
David Alli, Palm Springs
Anthony Urrea, Indio
David Smith, Riverside
Ana De Paz, Riverside
Charles Pozanac, Riverside
Jose Gonzalez, Riverside
Barbara Lies, Riverside
Mary Juma, Riverside
Catherine Crowley, Palm Desert
Janis Johnson, Palm Desert
Jesus Pacheco, Indio
Karen Johnson, Riverside
Cynthia Schwimmer, Riverside
Ernest Santora, Rancho Mirage
Elaine Logan, Palm Desert
Malte Schutz, Palm Springs
Lewis Green, Riverside
Elizabeth Ingersoll, Palm Springs
Jack Palmtag, Indian Wells
Mary Herrera, Riverside
Robert Narcisse, Riverside
Laverna Paananen, Desert Hot Springs
James Griffith, Cathedral City
Jason Freed, Palm Springs
Oriela Hicks, Riverside
Denise Edwards, Riverside
Walter Hammer, Palm Springs
Cheryl Machlis, Palm Desert
Brian Brown, Riverside
Claudia Cruz, Riverside
Richard Horbach, Palm Springs
Dennis Jory, Rancho Mirage
Kathryn Whitcomb, La Quinta
Brian Gray, Palm Desert
Beverly Brandon, Riverside
Roy Neville, Riverside

Collette Freeman, Riverside
Annalee Shrake, Palm Desert
Margaret Gonzalez, La Quinta
Juana Lujan, Riverside
Sahra Kent, Riverside
George Delorenzo, Palm Desert
Michael Emig, Cathedral City
Pamela Owen, Bermuda Dunes
Kathleen Kelly, Palm Desert
Rebecca Xenos, Palm Desert
Juan Hernandez, Riverside
Ernesto Quintero, Riverside
Pamela Mcdonagh, Palm Desert
Carl Dishman, Riverside
Gilberto Vega, Riverside
Aggie Greenberg, Riverside
Laureen Bryant, Cathedral City
Paul Cain, Cathedral City
Mark McClure, Palm Springs
Manuel Elias, Riverside
David Brooks, Palm Springs
Jacqueline Hamilton, Riverside
Robin Newman, Rancho Mirage
Khalid Mahmud, Riverside
David Hague, Riverside
Michael Lazzari, Palm Springs
Kathleen Griffith, Riverside
Marina Vavra, Riverside
Dwane Hathorn, Indio
William Bryant, Riverside
Jillian Roberts, Palm Desert
Anna Gezerlis, Riverside
Gary White, Rancho Mirage
Sylvia Jackson, Riverside
Scheherazad Dennis, Riverside
Maricela Palacios, Desert Hot Springs
Steven Muchnick, Riverside
Gregory Lamar, Riverside
Terence Kelly, Indio
John Vitaljic, Palm Springs
Diana Martinez, Riverside
Marion Yount, Cathedral City
Armando Lomeli, Riverside

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- Petition submitted by Aura Vasquez signed by the following: (Continued)

Marina Reyes, Riverside
Peggy Shevlin, Palm Desert
Jack Navarrette, Riverside
Rhonda Mann, Palm Springs
Dennis Mitchell, Desert Hot Springs
Robert Sicher, Riverside
Sheldon Rapoport, Rancho Mirage
Dorysa Halftermeyer, Rancho Mirage
Karen Holmes, Desert Hot Springs
Patricia Henson, Indio
Albert Carvalho, Cathedral City
James Spence, Riverside
Manon Findley, Palm Springs
Judith Holloway, Indio
Katherine Hunter, Riverside
Patricia Cortez, Riverside
Mary Marks, Palm Springs
Sandra Petterson, Riverside
Joaquina Munoz, Riverside
Barry Alley, Cathedral City
Debra Barnett, Riverside
Annette Cleveland, Palm Springs
Irene Rice, Palm Desert
Sara Angulo, Riverside
Gregory Craft, Desert Hot Springs
Linh Tran, Riverside
Daniel Drinan, Cathedral City
Deborah Gilcrease, Desert Hot Springs
Steven Frasca, Riverside
Karen Mack, Indio
Patrick Johnson, Riverside
Harold Raney, Palm Desert
Gaetano Pirelli, Rancho Mirage

Cynthia Maynard, Riverside
Pamela Conlin, Riverside
Ricky Bridgman, Riverside
Gerry Gustilo, Riverside
Carol Gaines, Riverside
Donna Levey, Palm Springs
Susan Bruder, Mecca
Linda Armstrong, Riverside
Monica Archuletta, Riverside

Glenn Nichols, Cathedral City
Mary Madison, Palm Springs
Wilma Morales, Riverside
Arthur Pritz, Palm Desert
Kirby Roucher, Riverside
Luis Perez, Riverside
Renee Hoffstetter, Riverside
Robert Weiser, Cathedral City
Scott Wiltsey, Rancho Mirage
Gary Smith, Palm Springs
Eleanor Arbeene, Palm Springs
Michael Capizzi, Indian Wells
Esperanza Lara, Indio
Vernon Osting, Cathedral City
Gary Glade, Riverside
Fredrick Ross, Palm Springs
Daniel Severson, Palm Desert
Michael Olawuyi, Riverside
Haydee Pearce, Riverside
John Schooler, Rancho Mirage
Virginia Bowers, Riverside
Joanna Lewis, Riverside
Bahram Mobasher, Riverside
Susan Sundquist, Riverside
Josephine Montes, Riverside
Stuart Armor, Palm Desert
William Brandt, Palm Springs
Firverick Haghverdian, Riverside
Robert Chrnalogar, Cathedral City
Ellen Fox, Palm Springs
Judson Sowry, Riverside
Dennis Toomey, Riverside
June Benson, Palm Desert

Amira Hindo, Riverside
Ada Buchanan, Desert Hot Springs
Colleen Mitchell, Palm Desert
Taylor Rice, Indio
Eddie Roundtree, Palm Desert
Danny Tanner, Indio
Rodney Royster, Riverside
Irma Bullough, Palm Desert
Adelino Desousa, Palm Springs

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- Petition submitted by Aura Vasquez signed by the following: (Continued)

| | |
|------------------------------------|-------------------------------------|
| Patricia Cannon, Riverside | Steve Montgomery, Riverside |
| Tom Paris, Palm Springs | Carolyn Stark, Riverside |
| James Holmes, Palm Springs | Marla Armstrong, Riverside |
| Marilyn Gosserand, Riverside | Essie Mccloud, Riverside |
| Jose Nunez, Thermal | Kenneth Combs, Palm Springs |
| Carrie Williams, Riverside | Michael Hensman, Palm Springs |
| Dianne Millard, Mountain Center | Louis Muto, Palm Desert |
| Victoria Rico, Riverside | Joseph Bielawa, Rancho Mirage |
| John Pofahl, Riverside | Monica Madison, Riverside |
| Paula Gustilo, Riverside | Timothy Hassett, Palm Springs |
| Raymond Mulliner, Cathedral City | Tari Clay, La Quinta |
| Janet Salinas, Riverside | Ward Bogert, Cathedral City |
| Bonnie Neisius, Riverside | Robert Ross, Cathedral City |
| Rico Cruz, Palm Desert | Charles Rosenbloom, Palm Desert |
| Henry Hamby, Riverside | Ruben Casey, Palm Springs |
| Daniel Szeto, Riverside | William Hanciles, Riverside |
| Rose Lomheim, Riverside | Kay Heidecker, Cathedral City |
| Georgina Chamouni, Riverside | Maria Carrillo, La Quinta |
| Sandra Ramirez, Riverside | Judy Judson, Riverside |
| Elizabeth Talamantes, Riverside | Albion Paradise, Palm Desert |
| Gloria Valladares, Riverside | Margaret Donohue, Riverside |
| Roger Mosser, Palm Springs | Maryann Baldwin, Riverside |
| Floretta Pruitt, Riverside | Agustin De La cruz, Riverside |
| Charles Ward, Thermal | Ruth Greenblatt, Indio |
| Richard Klotz, Palm Springs | Deborah Barles, Riverside |
| Joseph Baldwin, Riverside | Susan Walling, Riverside |
| Jairo Valladares, Riverside | Rosa Yates, Desert Hot Springs |
| Ron Berger, Palm Springs | Thomas Engler, Desert Hot Springs |
| Jose Mendivil, Blythe | Robert Cobb, Cathedral City |
| Leonard Hood, Palm Springs | Darryl Bixler, Riverside |
| Kathryn Kramer, Desert Hot Springs | Gregory Gossin, Desert Hot Springs |
| Shirley Brown, Riverside | Larry Nahmias, La Quinta |
| Mark Dye, Riverside | Lorraine Whitehurst, Cathedral City |
| Steven Lederman, Cathedral City | Phillip Broess, Palm Springs |
| Barbara Cervantes, Riverside | Laurie Souza, Rancho Mirage |
| Walid Zoppi, Riverside | Vicki Avila, Riverside |
| Mark Walwick, Rancho Mirage | Terri Nemecek, Riverside |
| Bruce Stava, Palm Desert | Pritpal Randhawa, Riverside |
| Marlene Muhammad, Riverside | Deborah Greco, Palm Springs |
| Pamela Telesford, Riverside | Gloria Alfred, Riverside |
| Lorraine Myrick, Riverside | Jose Mercado, Riverside |
| Cathy Vanhouten, Riverside | Roberta Torrenti, Cathedral City |
| Celeste Benson, Riverside | Dennis Russell, Riverside |

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- Petition submitted by Aura Vasquez signed by the following: (Continued)

Bessie Billoups, Riverside
Carol Amundson, Riverside
Michael Ortiz, Palm Springs
Barbara Gelin, Indio
Jeffrey Huard, Palm Springs
James Gilbert, Palm Springs
Robert Griffiths, Riverside
Rebecca Vasconcellos, Idyllwild
Kristine Beal, Indio
Mazen Abbasi, Riverside
Eutiquio Santoyo, Riverside
Piedad Reynoso, Cathedral City
Robert Wilson, Riverside
Rick Nadjar, Thousand Palms
Lorenzo Lepro, Indio
Lisa Crouch, Riverside
Jose Diaz, Riverside
Victor Gomez, Riverside
Richard Mignault, Palm Springs
Edward Famely, Riverside
Paul Pouesi, Riverside
Melissa Stewart, Cathedral City
Diana Enright, Riverside
Michael Mclaughlin, La Quinta
Janet Feldman, Palm Desert
Gary Zamis, Mountain Center
Doreen Rocha, Riverside
Elida Avila, Indio
Jesus Caballero, Riverside
Scott Brown, Palm Desert
Frank Roberts, Rancho Mirage
Anne Danowski, Rancho Mirage
Kelly Smith, Palm Desert
Barbara Bostian, Cathedral City
Jennifer Carr, La Quinta
Kevin Mcdermott, Palm Springs
Nancy Stelnick, Riverside
Joseph Galvin, Riverside
Tamara Baggett, Palm Desert
Steve Bean, Riverside
Thomas Johnson, Rancho Mirage
Juliet Albertson, Desert Hot Springs
Jose Anaya, Riverside

Michael Holzmueller, Palm Springs
Dan Hoxworth, Riverside
Gilbert Caudillo, Cathedral City
Marcus Heinbaugh, Indio
Alan Young, Palm Springs
Shelley Roderick, Desert Hot Springs
Regina Holmes, Riverside
Antonio Patino, Cathedral City
Peter Sipkins, Palm Springs
Shirley Weinberg, Cathedral City
Juan Delgadillo, Riverside
Esperanza Paz, Riverside
Alice McClain, Riverside
Scot Sullivan, Riverside
William Rinker, Riverside

Jacquelynn Alexander, Riverside
Juan Gutierrez, Riverside
Elias Orozco, Riverside
Elvira Beltran, Riverside
Ellen Cincotta, Cathedral City
Maria Ramirez, Cathedral City
Larry Faulkner, Palm Desert
Doldean Collins, Riverside
Daniel Mcfarlane, Riverside
Orlando Solano, Riverside
Esther Fisher, Riverside
James Henderson, Riverside
Denise Barbee, Riverside
Isabel Castro, Blythe
Patricia Munoz, Riverside
Pattidean Wohlford, Cathedral City
Denise Kieft, Riverside
Ilene Gabel, Palm Desert
Edie Griego, Riverside
Gary Hudson, Riverside
George James, Riverside
Jan Van Willigen, La Quinta
Ruby Macias, Riverside
Joseph Diaz, Riverside
Jack Gradias, Mecca
Shawn Kinniry, Palm Springs
Eric Hughes, Riverside

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

- Petition submitted by Aura Vasquez signed by the following: (Continued)

| | |
|--------------------------------------|--------------------------------------|
| Todd Llewellyn, La Quinta | Patricia Anderson, Riverside |
| Cynthia Jewell, Riverside | Karl Pratt, Indio |
| Cecilia Flores, Riverside | Monica Lichtfuss, Desert Hot Springs |
| Wanda Latson, Riverside | Craig Wroe, Palm Springs |
| Duane Dade, Riverside | Shelley Moore, Riverside |
| Robert Edelburg, Palm Springs | Thomas Bernath, Riverside |
| Carl Sanchez, Riverside | Edward Wilson, Palm Desert |
| Guillermo Soto, Riverside | Dina Battipaglia, Rancho Mirage |
| Pamela Bevins, Riverside | Donna Starr, Palm Desert |
| Consuelo Rivera, Coachella | George Mellor, Palm Desert |
| Stephanie Hakker, Riverside | Stacey Meyer, Rancho Mirage |
| Catarino Salmon, Riverside | Susan Briske, Indio |
| Tina Suarez, Riverside | Danilo Banario, Riverside |
| Vicky Mendoza, La Quinta | Tony Melara, Riverside |
| Don Seefeldt, Riverside | Stanley Ryndock, Indio |
| Michael Filbin, Riverside | Wayne Smith, Rancho Mirage |
| Cydney Osano, Riverside | Beverly Dickerson, Cathedral City |
| Katherine Martinez, Riverside | Charles Vedder, Riverside |
| Laura Ramirez, Riverside | Trudy Stahr, Palm Springs |
| Laurie Edwards, Indio | Ana Aguilar, Riverside |
| Lisa Hall, Riverside | Bruce Hall, Palm Desert |
| Alvin Taylor, Cathedral City | Oswaldo Dias, Riverside |
| Floyd Roberson, Riverside | Marco Miramontes, Mecca |
| Bertha Hernandez, Riverside | Daniel Graham, Riverside |
| Kathleen Miller, Riverside | David Kirk, Palm Desert |
| Deanna Goins, Riverside | Rhonda Hubler, Desert Hot Springs |
| Hans Kowoll, Palm Springs | Kathleen Zatopa, La Quinta |
| Rodolfo Arriaran, Desert Hot Springs | Mary Reeves, Palm Desert |
| Michael Schmelzle, Riverside | Priscilla Johnston, Riverside |
| John Welch, Palm Springs | Renea Hatcher, Riverside |
| Frances Blanton, Riverside | Maria Tsopels, Cathedral City |
| Jeff Sertich, Palm Springs | Maureen Woodcock, Cathedral City |
| Daniel Tea, Rancho Mirage | Robert Beck, Cathedral City |
| Charles Salmen, Palm Springs | Ann Weiss, Palm Springs |
| Christina Davila, Desert Hot Springs | Timothy Henriques, Palm Desert |
| Donald Vickers, Cathedral City | Gwendolyn Mcdermott, Riverside |
| Rogelio Franco, Riverside | Eva Reyes, Riverside |
| Gayl Moran, Palm Desert | Winifred Johnson, Riverside |
| Charles Codacovi, Palm Springs | |

****936-1685 were phone calls made expressing support to strengthen Rules 1111 and 1121 the adoption of stronger, cleaner air quality standards by the South Coast Air Quality Management District (SCAQMD) to protect our environment, improve public health, and ensure a more sustainable future for California.

**Attachment A to the Minutes – June 6, 2025 Governing Board Meeting
PAR 1111 AND PAR 1121 WRITTEN PUBLIC COMMENTS**

*COMMENTS RECEIVED DURING OR AFTER THE PUBLIC HEARING WERE SUBMITTED BY
THE FOLLOWING INDIVIDUALS:*

COMMENTS OPPOSING

| | |
|--------------------------------------|--|
| Allyson Kirkland | Jonathan P |
| Andrew Plukas | Joseph Lambert |
| Carmeu Cartusciello | Joy Milam |
| Carol Eggers | Karen Fry |
| Cathy Montgomery | Larry Locke – Wildomar |
| Chad Franklin | Laurie West – Arcadia |
| Christine Sexton | Lina Setiawan |
| Claudia Roxburgh – Newport Beach | Long Beach Accountability Action Group |
| Cory | Luanne Shoup |
| Cory Salter | Mark Riley |
| David Sanders | Nancy Anderson |
| Debbie Jones | Nancy Hamilton |
| Deborah Haag – San Juan Capistrano | Nancy Scarbrough |
| Deborah Thomas | Norman Metcalfe |
| Dr. and Mrs. Richard Price – Yucaipa | Paul Chassey – Riverside County |
| Frank Rosas | Sandra Hernandez |
| Gerald Blanton – Santa Clarita | Thomas Firek |
| James Enstrom | Wilfred Schneider - Highland |
| Joh Pakusich | |

COMMENTS SUPPORTING

- Councilmember Edward Belden, City of Monrovia
- Senator Lena Gonzalez, District 33

| | |
|---|--------------------------------------|
| American Institute of Architects Orange County Chapter | Kristin Roberts |
| Carly Curiel | Lai Sam |
| Cheryl Auger and Chris Peck - Pasadena | Mark Rukowski – La Canada Flintridge |
| Claudia Funke – Pasadena | Mike Gutierrez – Corona |
| Connie Jean | Paul Stills |
| Daryl Gale – Los Angeles | Shanna Rojas – Hesperia |
| Ivy Kwok | Stephanie Corona – Downey |
| Joanne Jim | Sylvia Boris – Culver City |
| Jose Gonzalez | Tambry Lee – Northridge |
| | Zack Stills |

BOARD MEETING DATE: August 1, 2025

AGENDA NO. 2

PROPOSAL: Set Public Hearings September 5, 2025 to Consider Adoption of and/or Amendments to South Coast AQMD Rules and Regulations:

A. Determine That Proposed Amended Rule 223 – Requirements for Confined Animal Facilities, Is Exempt from CEQA; Amend Rule 223; and Submit Rule 223 Into State Implementation Plan

Proposed Amended Rule 223 (PAR 223) will implement control measure BCM-08 – Emission Reductions from Livestock Waste at Confined Animal Facilities, from the South Coast Air Basin 2024 Attainment Plan for the 2012 Annual PM_{2.5} National Ambient Air Quality Standard, and comply with the federal Clean Air Act requirements for Most Stringent Measures. The proposed amended rule will lower the applicability thresholds for large confined animal facilities that are required to obtain permits and implement emission reduction mitigation measures. This action is to adopt the Resolution: 1) Determining that PAR 223 – Requirements for Confined Animal Facilities, is exempt from the requirements of the California Environmental Quality Act; 2) Amending Rule 223; and 3) Directing staff to submit PAR 223 – Requirements for Confined Animal Facilities for inclusion into the State Implementation Plan. (Reviewed: Stationary Source Committee, June 20, 2025)

B. Determine That Proposed Amended Rule 445 – Wood-Burning Devices, Is Exempt from CEQA; Amend Rule 445; and Submit Rule 445 Into State Implementation Plan

Proposed Amended Rule 445 (PAR 445) will address federal Clean Air Act requirements for Most Stringent Measure and implement BCM-18: Further Emission Reductions from Wood-Burning Fireplaces and Wood Stoves of the South Coast Air Basin Attainment Plan for the 2012 Annual PM_{2.5} National Ambient Air Quality Standard. The PM_{2.5} curtailment threshold for calling a no-burn day will be lowered and the exemption of low-income households from a no-burn day will be removed. A new provision

is added to address rebuilds due to wildfires. This action is to adopt the Resolution: 1) Determining that PAR 445 – Wood-Burning Devices, is exempt from the requirements of the California Environmental Quality Act; 2) Amending Rule 445 – Wood-Burning Devices; and 3) Directing staff to submit PAR 445 – Wood-Burning Devices for inclusion into the State Implementation Plan. (Reviewed: Stationary Source Committee, June 20, 2025)

C. Determine That Proposed Amended Rules 1133, 1133.1, 1133.2, and 1133.3, Are Exempt from CEQA; Amend Rules 1133, 1133.1, 1133.2, and 1133.3; and Submit Rules 1133, 1133.1, 1133.2, and 1133.3 Into State Implementation Plan

Proposed Amended Rule (PAR) 1133, PAR 1133.1, PAR 1133.2, and PAR 1133.3, will further reduce VOC and ammonia emissions from chipping and grinding operations, co-composting operations, and composting operations by regulating the supply of uncomposted greenwaste for direct land application. Additionally, PAR 1133.2 will introduce composting best management practices for previously uncontrolled existing co-composting operations. This action is to adopt the Resolution: 1) Determining That PAR 1133 – Emission Reductions from Direct Land Application, PAR 1133.1 – Chipping and Grinding Operations, PAR 1133.2 – Emission Reductions from Co-composting Operations, and PAR 1133.3 – Emission Reductions from Composting Operations are exempt from the requirements of the California Environmental Quality Act; 2) Amending Rules 1133, 1133.1, 1133.2, and 1133.3; and 3) Directing staff to submit PARs 1133, 1133.1, 1133.2, and 1133.3 for inclusion into the State Implementation Plan. (Reviewed: Stationary Source Committee, June 20, 2025)

D. Determine That Proposed Amended Rule 1138 – Control of Emissions From Restaurant Operations, Is Exempt from CEQA; Amend Rule 1138; Submit Rule 1138 Into State Implementation Plan

Proposed Amended Rule 1138 (PAR 1138) will address federal Clean Air Act requirements for Most Stringent Measures and partially implement a control measure from the South Coast Air Basin Attainment Plan for the 2012 Annual PM_{2.5} Standard. The current exemption threshold will be lowered, and an alternative exemption option will be added, to be consistent with similar but more stringent rules adopted by other air districts in California.

This action is to adopt the Resolution: 1) Determining that (PAR) 1138 – Control of Emissions From Restaurant Operations, is exempt from the requirements of the California Environmental Quality Act; 2) Amending Rule 1138– Control of Emissions From Restaurant Operations; and 3) Directing staff to submit (PAR) 1138 – Control of Emissions From Restaurant Operations, for inclusion into the State Implementation Plan (Reviewed: Stationary Source Committee, June 20, 2025)

The complete text of the proposed amended rules and other supporting documents will be made available from the South Coast AQMD’s Public Information Center at (909) 396-2001, or Ms. Lisa Tanaka – Deputy Executive Officer/Public Advisor, South Coast AQMD, 21865 Copley Drive, Diamond Bar, CA 91765, (909) 396-3327, ltanaka@aqmd.gov and on the South Coast AQMD website at www.aqmd.gov as of August 5, 2025.

RECOMMENDED ACTIONS:

Set Public Hearings September 5, 2025 to: 1) Determine that PAR 223 is exempt from CEQA, Amend Rule 223, and Submit into the State Implementation Plan (SIP); 2) Determine that PAR 445 is exempt from CEQA, Amend Rule 445, and Submit into the SIP; 3) Determine that PARs 1133, 1133.1, 1133.2, and 1133.3 are exempt from CEQA, Amend Rules 1133, 1133.1, 1133.2, and Submit into the SIP; and 4) Determine that PAR 1138 is exempt from CEQA, Amend Rule 1138, and Submit into the SIP.

Wayne Natri
Executive Officer

FT

BOARD MEETING DATE: August 1, 2025

AGENDA NO. 3

PROPOSAL: Issue Program Announcements for Battery Electric Class 8 Trucks, Cargo Handling Equipment and Charging Infrastructure for INVEST CLEAN Program

SYNOPSIS: In September 2024 the Board recognized an award of \$499,997,415 from the U.S. EPA titled Infrastructure, Vehicles, and Equipment Strategy for Climate, Equity, Air Quality, and National Competitiveness (INVEST CLEAN). The program comprises four incentive measures, including the deployment of battery-electric Class 8 trucks and last-mile freight vehicles, cargo handling equipment, switcher locomotives, and charging infrastructure. A total of up to \$178,500,000, \$28,000,000, and \$20,600,000 for the Infrastructure, Class 8 Freight Vehicle Deployment and Cargo Handling Equipment Measures, respectively, will be reimbursed from the U.S. EPA INVEST CLEAN grant and administered from the U.S. EPA CPRG Special Revenue Fund (90). SCAG will implement the Last-Mile Freight Program totaling \$50 million in rebates. These actions are to: 1) issue and, if necessary, re-issue Program Announcements for Battery Electric Class 8 Trucks, Cargo Handling Equipment, and Charging Infrastructure under INVEST CLEAN; and 2) authorize the Executive Officer to execute contracts for eligible projects selected through these solicitations from the U.S. EPA CPRG Special Revenue Fund (90).

COMMITTEE: Technology, June 20, 2025; Recommended for Approval

RECOMMENDED ACTIONS:

1. Issue, and if necessary, re-issue PA #2026-01 for Battery Electric Cargo Handling Equipment, PA#2026-02 for Battery Electric Class 8 Trucks, and PA #2026-03 for Charging Infrastructure under INVEST CLEAN; and

2. Based on the results of the Program Announcements, authorize the Executive Officer to execute agreements with applicants for eligible projects up to \$20,600,000 for the Cargo Handling Equipment Measure (PA #2026-01), \$28,000,000 for the Freight Vehicle Deployment Measure (PA #2026-02) and \$178,500,000 for the Infrastructure Measure (PA #2026-03) from the U.S. EPA CPRG Special Revenue Fund (90).

Wayne Natri
Executive Officer

AK:MW:AY

Background

In April 2024, South Coast AQMD joined by two Metropolitan Statistical Areas (MSAs), which cover Los Angeles, Long Beach, and Anaheim; and Riverside, San Bernardino, and Ontario, submitted a regional proposal to U.S. EPA titled Infrastructure, Vehicles, and Equipment Strategy for Climate, Equity, Air Quality, and National Competitiveness (INVEST CLEAN). In October 2024, the South Coast AQMD was awarded \$499,997,415 for the INVEST CLEAN initiative.

The INVEST CLEAN initiative focuses on reducing emissions from the goods movement sectors by implementing incentive measures and electrifying the Southern California goods movement corridor while providing a catalyst for economic growth, job creation, and workforce training. The four Measures include: (1) Charging Infrastructure Deployment Incentive Program to provide incentives to install electrical charging equipment to support heavy duty Battery Electric vehicles; (2) Battery Electric Freight Vehicle and Last Mile Freight Vehicle Deployment Incentive Program; (3) Battery Electric Cargo Handling Equipment (CHE) Deployment Incentive Program to replace or convert CHE with battery electric equipment and supporting infrastructure used at facilities such as warehouses, intermodal railyards, airports, ports, or freight facility centers; and, (4) battery electric Switcher Locomotive Program to replace diesel locomotives domiciled in the MSAs region with Battery Electric Switchers. The expected total cumulative GHG emission reductions include 3.6 million metric tons of Carbon Dioxide Equivalent (CO₂e) or \$139/metric ton CO₂e over a 5-year period and 12 million metric tons CO₂e or \$42/metric ton CO₂e over a 25-year period.

INVEST CLEAN's investments in battery electric locomotives, vehicles, other equipment, and charging infrastructure included in the four incentive measures are projected to generate approximately 470 high-quality jobs in California while supporting and creating approximately 4,700 high-quality jobs nationwide. The

measure's collaboration with labor, academia, and non-government organizations strengthens the potential for significant job creation and workforce development, which are critical for implementing, maintaining, and sustaining the implementation of new technologies in the freight sector.

On June 6, 2025, the Board approved the release of RFP #2025-15 for the INVEST CLEAN Battery Electric Switcher Locomotives Measure, with solicitation scheduled to close on September 30, 2025, for a total of up to \$190,800,000. The available funding for the remaining three Measures, including Charging Infrastructure, Class 8 Freight Vehicle Deployment, and Cargo Handling Equipment Measures, is \$178,500,000, \$28,000,000, and \$20,600,000, respectively. SCAG will be implementing Last Miles Freight Program totaling \$50 million in available rebates.

Charging Infrastructure Deployment Incentive Program (Measure 1)

This measure provides incentives to install electrical charging equipment to support the Southern California goods movement corridor for battery electric Class 4 to 8 trucks. The current lack of infrastructure is a limiting factor in the deployment of battery electric trucks. The implementation of this measure will help align with State and local Priority Climate Action Plans and to support widespread adoption of battery electric trucks in the region.

Incentive funding for charging infrastructure will be rebate-based and will be allocated directly towards the equipment necessary to support the operation of the chargers, as well as the potential associated installation costs. Under this measure, a total of \$178,500,00 is available for charging infrastructure rebates to purchase and install chargers rated 250 kW or higher in one of two MSAs. Each project will receive up to \$700/kW for the procurement and installation of equipment.

Battery Electric Freight Vehicles Program (Measure 2.1)

The Battery Electric Freight Vehicle Deployment Incentive Program will provide funding rebates for the transition of goods movement operations to advanced technologies. The program will reduce emissions by upgrading the heavy-duty long-haul Class 8 diesel freight delivery vehicles with battery-electric technology within two MSAs.

Mobile sources related to Goods Movement contribute to more than 80 percent of the NO_x and 30 percent of particulate matter in the South Coast Air Basin. Under the Battery Electric Freight Deployment Incentive Program, approximately \$28,000,000 has been designated for this measure with each eligible replacement project eligible for up to \$400,000 per vehicle. This measure will replace approximately 70 high polluting diesel vehicles with battery electric technology resulting in substantial emission reductions.

Battery Electric Cargo Handling Equipment (CHE) Program (Measure 3)

This measure will reduce emissions associated with goods movement by replacing diesel-powered CHE with battery electric CHE at facilities such as warehouses, intermodal railyards, airports, ports, and freight facility centers located within the two MSAs.

According to data gathered from the CARB Off-Road Emissions Inventory, the South Coast Air Basin currently houses approximately 2,890 diesel-fueled CHE units, which result in significant emissions of NO_x, PM₁₀, and PM_{2.5}. Emission inventory data estimates that this equipment contributes approximately 2.42 tons/day (881.73 tons/year) NO_x, 0.10 tons/day (35.07 tons/year) PM₁₀, and 0.09 tons/day (32.28 tons/year) PM_{2.5}.

Under this measure, up to \$20,600,000 is allocated to fund the deployment of battery electric CHE within the two MSAs. Eligible equipment types for this measure include yard trucks and top handlers. The costs of the replacement battery electric CHE are eligible for funding with a maximum incentive cap of \$300,000 per yard truck and \$400,000 per top handler.

Proposals

Staff recommends issuing #PA2026-01 to solicit applications for Battery Electric Cargo Handling Equipment, #PA2026-02 to solicit applications for Battery Electric Freight Vehicles, and #PA2026-03 to solicit applications for charging infrastructure. # The solicitation will be open to operators and owners, aiming to select projects that operate within the two MSAs. Applications will be accepted beginning August 15, 2025, at 12:00 p.m. and are due November 28, 2025, at 12:00 p.m. Proposals will be reviewed and evaluated in accordance with the attached PA criteria. If needed, staff recommends, authorizing the Executive Officer to re-issue any of the PAs.

Staff also recommends authorizing the Executive Officer to execute agreements from the U.S. EPA CPRG Special Revenue Fund (90) for eligible projects under #PA2026-01, #PA2026-02, and #PA2026-03, until funds are exhausted.

Outreach

In accordance with South Coast AQMD's Procurement Policy and Procedure, a public notice advertising the PAs and inviting applicants will be published in the Los Angeles Times, the Orange County Register, the San Bernardino Sun, and Riverside County's Press Enterprise newspapers to leverage the most cost-effective method of outreach to the South Coast Air Basin. Additionally, potential applicants may be notified utilizing South Coast AQMD's electronic listing.

Benefits to South Coast AQMD

INVEST CLEAN's Measures 1 through 3 will deliver significant environmental benefits. Successful implementation of these Measures will result in estimated annual emission reductions of 1,329 tons of NO_x, 19.4 tons of PM_{2.5}, and 20.3 tons of diesel particulate matter (DPM). INVEST CLEAN is also expected to decrease CO₂e emissions by 3.6 million metric tons between 2025 and 2030. The deployed heavy-duty vehicles, CHE and charging infrastructure are expected to operate for many years after the agreement term ends, which provides long-term emission reduction benefits. In addition, these technologies and the associated emission reductions are needed to reduce NO_x and PM_{2.5} to help the Basin achieve ozone and PM_{2.5} National Ambient Air Quality Standards. The data collected will be utilized to accelerate adoption and continue the evolution of battery electric mobile source technology.

Resource Impacts

The U.S. EPA INVEST CLEAN grant includes \$227,100,000 in funding for the three rebate programs described in this Board Letter. The projects will be reimbursed from the U.S EPA INVEST CLEAN grant and administered from the U.S. EPA CPRG Special Revenue Fund (90).

Attachments

- A. #PA2026-01: Battery Electric Cargo Handling Equipment (CHE) Program (Measure 3) Under INVEST CLEAN
- B. #PA2026-02: Battery Electric Freight Vehicles Program (Measure 2.1) Under INVEST CLEAN
- C. #PA2026-03: Charging Infrastructure Deployment Incentive Program (Measure 1) Under INVEST CLEAN



South Coast
Air Quality
Management District

INVEST CLEAN

Climate Pollution Reduction Grant U.S. Environmental Protection Agency



Program Announcement #PA2026-01

Measure 3-Battery Electric Cargo Handling
Equipment

Accepting Applications: August 15, 2025, at 12:00 PM PT

Submission Deadline: November 28, 2025, at 12:00 PM PT

Section 1 – Introduction

In July 2024, US EPA awarded funds to the South Coast Air Quality Management District (South Coast AQMD) to implement INVEST CLEAN in Los Angeles-Long Beach-Anaheim and Riverside-San Bernardino-Ontario Metropolitan Statistical Areas (MSAs). These two MSAs include the following four counties: Los Angeles, Orange, Riverside, and San Bernardino. INVEST CLEAN targets the limiting factors and challenges to the electrification transformation of the Southern California goods movement corridor.

INVEST CLEAN comprises four incentive measures to modernize the goods movement sectors. Under this Program Announcement (PA), the South Coast AQMD is soliciting applications for Measure 3 of the INVEST CLEAN Program, the Battery Electric (BE) Cargo Handling Equipment (CHE) Deployment Program. The total incentive amount of CPRG Funding allocated for Measure 3 is \$20.6 million. This measure focuses on deploying BE CHE to introduce advanced technologies to the market and to accelerate the adoption of those technologies within the two MSAs mentioned above, which serve as the West Coast's gateway to international commerce. This measure will help reduce emissions from goods movement facilities by retiring and replacing diesel-powered CHE used at facilities such as warehouses, intermodal railyards, airports, ports, or freight facility centers. CHE encompasses a wide variety of equipment including, but not limited to, yard trucks and top handlers. Measure 3 is structured as a rebate-based initiative for the replacement of eligible CHE with BE technology. Each rebate requires the recipient to scrap an existing CHE, which is pivotal to the strength of this emission reduction strategy because existing CHE is predominantly diesel-fueled and highly polluting.

South Coast AQMD places a high level of emphasis on funding projects that reduce emissions from traditionally diesel-powered CHE, contributing to improved air quality in impacted communities and California trade corridors.

The following sections describe the eligibility requirements to participate in the Measure 3 Battery Electric Cargo Handling Equipment of the INVEST CLEAN program and the guidelines for submitting an application under this PA.

Section 2 – PA Overview & Eligibility Requirements

Measure 3: Battery Electric Cargo Handling Equipment of the INVEST CLEAN Initiative provides funding for the deployment of BE CHE within the two MSA geographic areas.

2.1 Available Funding

The maximum funding amount for each type of eligible Battery Electric CHE is shown below. For each piece of eligible equipment, the awardee could receive up to the total cost (including tax and other fees) for the respective equipment, subject to the funding cap limits in Table 1 below.

Table 1. Project Funding Available

| Project Type | Funding |
|--------------|-----------------|
| Yard Truck | Up to \$300,000 |
| Top Handler | Up to \$400,000 |

Note that up to 100% of the equipment cost may be covered under this program. However, the rebate may be discounted to ensure that the total incentives for a project do not exceed the total eligible cost.

Should South Coast AQMD receive applications with total requests less than the amount allocated, or if applications are deemed non-meritorious, South Coast AQMD reserves the right to reduce the total funding available and reallocate funds to other INVEST CLEAN Measures and/or reopen another BE CHE Program Announcement. Funding for other CHE types may be made available at a later date, pending eligibility determination by the US EPA and review of other available incentive programs for CHE.

2.2 Geographical Funding Minimum

South Coast AQMD has not established a Geographical Funding Minimum for each county within the two MSAs, but the intent is to allocate project funding equally throughout the two MSAs, if feasible, following the completion of application evaluations.

2.3 Eligibility Requirements

For this PA, the following eligibility requirements apply:

WHO: Fleet owners of CHE at inland ports and seaports, warehouses, freight facility centers, and intermodal railyards. The equipment must be domiciled and operate 100% of the time within one of the two MSA regions shown in the dotted areas on the map below in Figure 1, which include the following four counties: Los Angeles, Orange, Riverside, and San Bernardino.

WHAT EQUIPMENT: Eligible equipment types include yard trucks and top handlers. The equivalent baseline equipment (top handler or yard truck) that will be removed from operation must be diesel-fueled.

HOW: Applications must be submitted through South Coast AQMD's Grant Management System (GMS), which can be found at: <http://www.aqmd.gov/investclean>.

WHEN: Applications can be submitted starting August 15, 2025, at 12 PM PT and will be accepted until November 28, 2025, at 12 PM PT or until Program funds are encumbered.

ALL APPLICATIONS MUST BE SUBMITTED VIA SOUTH COAST AQMD'S ONLINE GRANT MANAGEMENT SYSTEM (GMS)

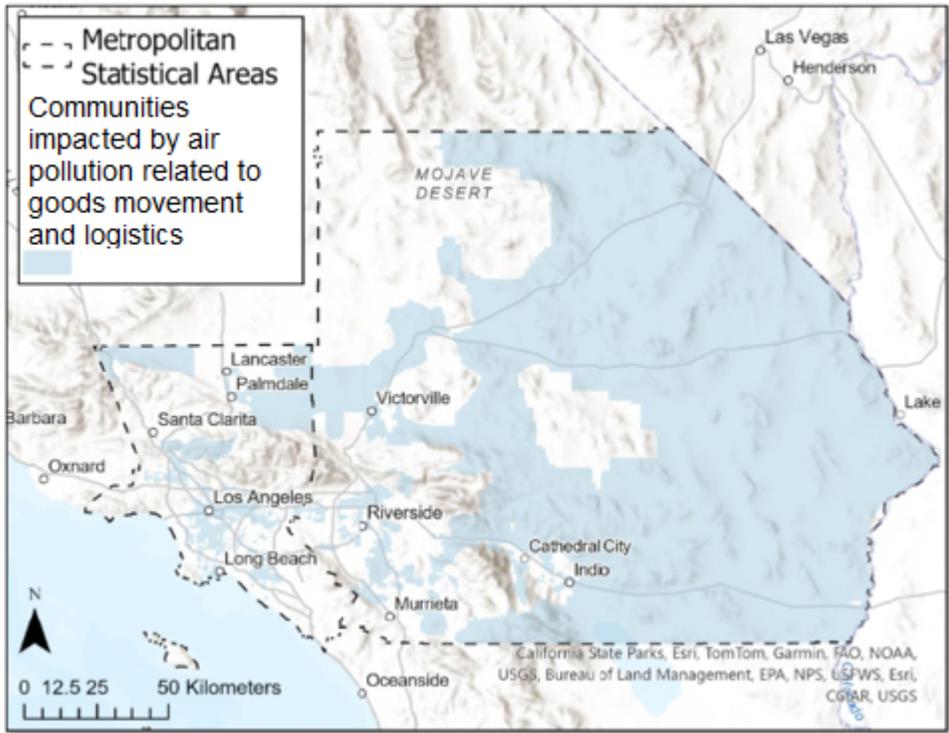


Figure 1: Area inside the dotted lines represents the two MSA qualified territories.

Deployment of New BE CHE:

- Upon delivery of the new equipment, the applicant must notify South Coast AQMD Staff so a post-inspection may be performed. During the post-inspection, South Coast AQMD Inspectors or their designees will verify the specifications of the new equipment and confirm that the equipment is operational. Inspections can occur virtually or in person at the discretion of South Coast AQMD.
- The new equipment should be operated 100% within one or both of the two MSAs for the full project term. At a minimum, a five (5) year project term for each new BE CHE will be required, but if unforeseen circumstances prevent the applicants from meeting this requirement, documentation must be provided.

Required Destruction of Old Equipment (Scrapping):

After the deployment of replacement battery-electric equipment, the engines and equipment that were replaced as part of this program must be destroyed and rendered useless. Payment will not be issued until the existing equipment is scrapped. This ensures that the existing equipment is not reused. Requirements for old/baseline equipment destruction are as follows:

- Both the old engine and the old equipment must be destroyed. Destruction must occur within 60 days after the new equipment is received and placed into service.
- South Coast AQMD must be notified within 14 days prior to equipment destruction so that an inspection can be performed if deemed necessary by South Coast AQMD.
- Documentation of the destruction must be provided to South Coast AQMD within 90 days of destruction.
- The method used to destroy the old equipment may vary depending on the equipment type; however, the equipment must be rendered inoperable, and all engines must be destroyed using the following methods:
 - All frame cuts must be performed on load-bearing frames of the existing equipment.
 - A hole in the engine block with a minimum diameter of three inches at its narrowest point. The hole must be irregularly shaped (e.g., no symmetrical squares or circles).
 - Other equivalent methods of destruction may be used if approved by the South Coast AQMD.
- The cost of salvaging any existing equipment will not be reimbursed.

2.4 Project Workflow:

The flowchart in Figure 2 depicts the evaluation process for a typical BE CHE project, while Table 1 below provides a detailed explanation of each step. Projects will begin with an online application, followed by an evaluation conducted by South Coast AQMD staff. If approved, projects will then proceed through the following stages: execution of agreements, project implementation, invoicing and reimbursement, and required reporting.

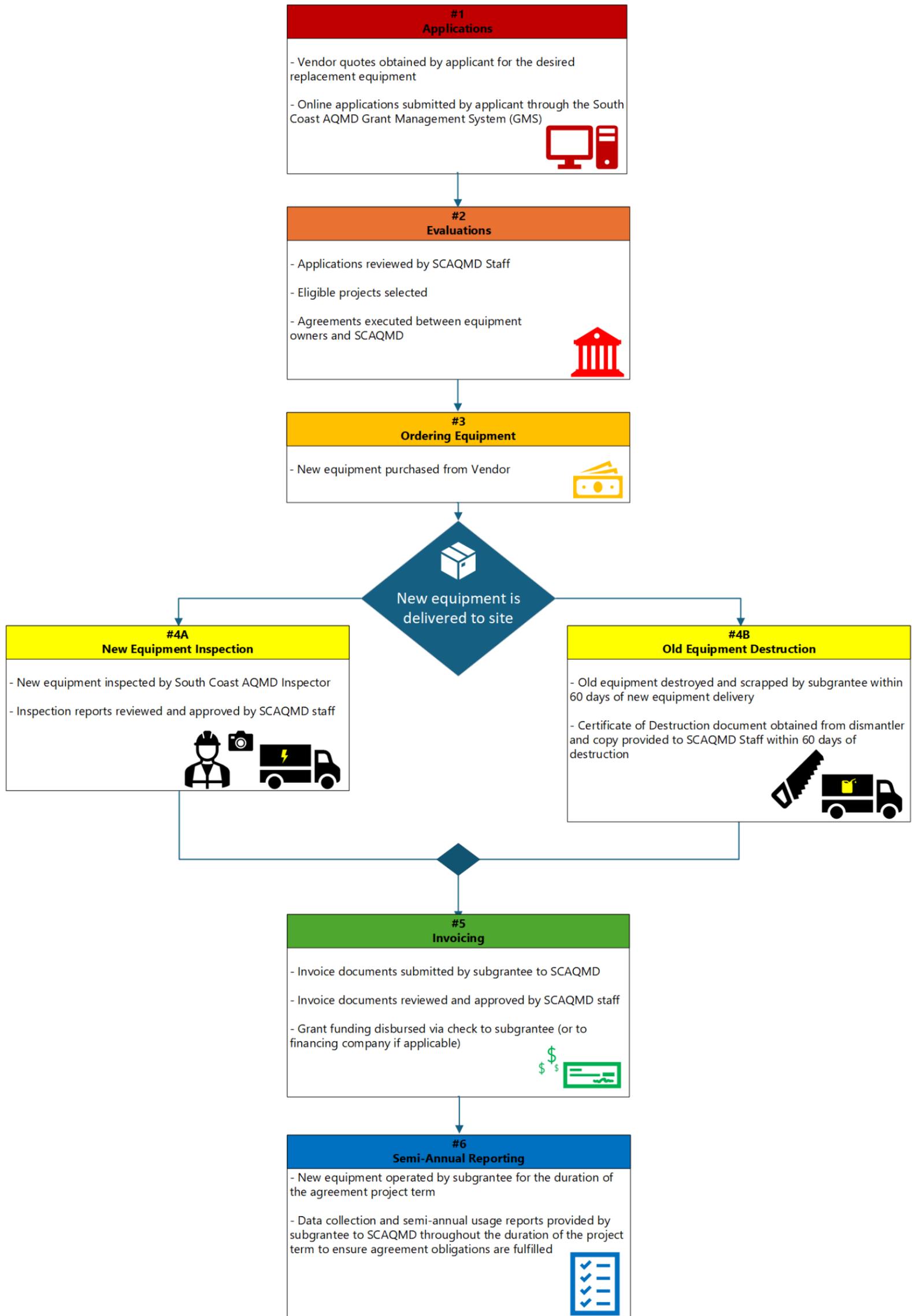


Figure 2: Lifecycle for Battery Electric Cargo Handling Equipment Replacement Projects

Table 1 below offers a step-by-step explanation of the flow chart. Please refer to the flow chart’s box number and the corresponding process description below:

Table 1: Step-by-Step Explanation

| Chart Process # | Description of Process |
|---|---|
| 1 | The process begins with an open application period when applicants may submit INVEST CLEAN grant applications online through South Coast AQMD’s Grant Management System (GMS). During the application process, applicants are required to obtain at least one quote from an equipment vendor for the new equipment they intend to purchase. More than one quote is encouraged to determine the best price estimate. All vendor quotes must be dated within 90 days of the application submission date. Quotes for new equipment must include a minimum 3-year warranty (which will be included as an eligible cost). When completing an application, applicants must provide information and documentation including, but not limited to, the materials summarized in Attachment A. |
| 2 | Upon receipt of a submitted application, South Coast AQMD staff will review the application to screen for completeness and project eligibility. If additional information, documentation, or updates are required, South Coast AQMD staff will allow the applicant 14 days to provide any requested documentation and/or updates. Eligible projects will be approved for funding as received and prioritized by application submission date. If an applicant has been approved for funding of one or more projects, an agreement will be executed between the applicant and South Coast AQMD. Agreements specify the project requirements and set milestones for the destruction of the old/baseline equipment and the delivery and operation of the new/replacement equipment. |
| 3 | Once an agreement has been fully executed, the applicant, now referred to as the Awardee, may proceed to order and purchase the new/replacement equipment from the equipment vendor. Measure 3 of INVEST CLEAN provides grant funding on a reimbursement basis, issued as a rebate. Accordingly, South Coast AQMD will disburse funds to the Awardee after project implementation is completed as outlined in Step 5 below. |
|  | After the new/replacement equipment is delivered, the Awardee must inform South Coast AQMD staff so an inspection can be scheduled. |
| 4A | A South Coast AQMD Inspector will be assigned to inspect the new/replacement equipment. The Inspector will coordinate with the Awardee directly to arrange an inspection date and time. Inspections may be performed either on-site or via video or photograph(s) at the Inspector’s discretion. The inspector will verify specifications for the new/replacement equipment including, but not limited to, new equipment make, model, model year, product identification number/serial number, Product Identification Number/Serial Number, battery type, battery capacity, range, motor make, motor model, power rating (in kW or HP), charging options/location(s), or other applicable specifications. Upon completion of the inspection, the Inspector will submit an Inspection Report for review by South Coast AQMD staff. |

| | |
|-----------|---|
| <p>4B</p> | <p>Upon delivery of the new/replacement equipment, the Awardee will have 60 days to destroy the old/baseline equipment and engine. The applicant may destroy the old equipment through a certified dismantler. Other methods of scrapping and dismantling may be approved by South Coast AQMD on a case-by-case basis in advance (in writing). Upon destruction and scrapping of the old equipment, the Awardee must obtain a Certificate of Destruction from the scrap yard/dismantler and provide a copy to South Coast AQMD Staff within 60 days of destruction.</p> |
| <p>5</p> | <p>Upon approval of the post-inspection report and receipt of the Certificate of Destruction, the Awardees can submit invoices to the South Coast AQMD staff. Invoice documents include, but are not limited to, an Invoice requesting payment from the Awardee, copies of any Purchase Invoices from the vendor, and copies of any bank-cleared checks from the applicant to the vendor as proof of payment. For financed equipment, additional documents will be required including a copy of the finance agreement between the Awardee and financing company, a Payment Authorization Form (provided during the invoicing process upon request), copies of any bank-cleared checks from the Awardee to the financing company, and a copy of the wire transfer from the Awardee/financing company to the vendor. Once all documents are received and approved by South Coast AQMD staff, payment will be issued per the terms of the agreement.</p> |
| <p>6</p> | <p>After the new equipment has been delivered and funding has been disbursed, the Awardee is responsible for maintaining ownership of the new equipment for the duration of the project term and must abide by any usage requirements and real-time or telematic usage data collection requirements detailed in the agreement. Usage reports noting the hour usage (or mileage) of the new equipment must be submitted to South Coast AQMD on a semi-annual basis according to the schedule specified in the project milestones of the agreement.</p> <p>At the conclusion of the project term and after all semi-annual usage reports have been submitted and reviewed, South Coast AQMD staff will notify the Awardee of project completion status. In the event that project milestones or usage requirements are not met, South Coast AQMD reserves the right to extend the project term if necessary to achieve project goals.</p> |

Table 1: Explanation of Process Steps in Figure 2

Section 3 – PA Timeline (These dates are subject to change)

| Item | Date |
|--------------------------------|--|
| Issue PA2026-01 | August 1, 2025 |
| Applications Open | August 15, 2025, at 12 PM PT |
| Deadline to Submit Application | November 28, 2025, at 12 PM PT or until funds are encumbered (whichever comes earlier) |
| Agreement Execution | January 2026 through April 2027 |
| Invoice Review and Payment | June 2026 through February 2028 |
| Performance and usage tracking | Commencing after Deployment for a minimum of five years. |

NOTE: PA may be re-issued as needed

3.1 PA Amendments

South Coast AQMD may modify the PA and/or issue supplementary information or guidelines relating to the PA during the application preparation and acceptance period from August 15, 2025, at 12:00 PM PT to November 28, 2025, at 12:00 PM PT. Amendments will be posted on the INVEST CLEAN website at <https://www.aqmd.gov/home/technology/implementation/invest-clean>.

Section 4 – Application Preparation & Submittal Instructions

4.1 Application Submission Requirements:

Please reference Attachment A for information required to complete and submit an application through our online INVEST CLEAN Grant Management System (GMS) provided at: <https://www.aqmd.gov/home/technology/implementation/invest-clean>

- INVEST CLEAN Program grants can be no greater than a project’s procurement cost. Costs for warranty, shipment, and tax may be eligible project costs.
- Applicants must provide proof that they have owned each old/baseline equipment unit for at least one year.
- Vendor quotes must be dated no longer than 90 days prior to the application submittal date.
- More than one quote is encouraged to determine the best cost estimate.
- Applicants shall inform the vendor of the time frame of the award process so that the vendor can estimate prices based on the projected order/purchase date, since funding requests and awards may not be revised after the Program closing date
- Vendor quotes must include a minimum 3-year warranty for the new equipment.
- Applicants must provide engine documentation for existing/baseline equipment detailing engine serial number, model year, horsepower, and tier certification. The certification emission standard and Tier designation for the engine must be determined from CARB’s Executive Order issued for that engine, not by the engine model year. Executive orders for off-road engines may be found at <http://www.arb.ca.gov/msprog/offroad/cert/cert.php>

- Applicants must provide documentation for new battery-electric equipment detailing make, model, model year, battery type, battery capacity, range, charging options, or other applicable specifications.
- New battery-electric equipment must be certified/verified for sale in California and must comply with durability and warranty requirements.
- Applicants must provide historical usage records of the existing/baseline equipment for the past 12 months.
- Applicants must provide the CARB compliance status for the existing CHE fleet (ex., DOORS Compliance Snapshots).

The South Coast AQMD retains the authority to impose more stringent requirements as necessary to address additional concerns

4.2 Certifications and Representations

South Coast AQMD “Business Information Forms” require signatures and are available on the GMS via the application portal. These forms are required to be uploaded prior to the application deadline as part of the application submittal.

4.3 Vendor Notification

Applicants must provide cost information that specifies the amount of funding requested and the basis for that request by attaching vendor quotes to the application. Vendor quotes must be dated no more than 90 days prior to the application submittal date. Applicants must inform vendors of the timeframe for the award process so that they can accurately quote costs based on the anticipated order or purchase date.

No purchase orders may be placed or work performed for projects awarded under this PA until after the execution date of the rebate agreement between the Awardee and South Coast AQMD. The South Coast AQMD has no obligation to fund a project until an agreement is fully executed by both parties. All project costs must be clearly indicated in the application.

4.4 Confidentiality

Applicants must ensure that any trade secret, confidential or proprietary information they provide is marked accordingly. Please see the following website for more details:

<https://www.aqmd.gov/docs/default-source/default-document-library/Guidelines/praguidelines.pdf>

Section 5 – Application Evaluation

South Coast AQMD staff will evaluate all submitted applications as they are received until the application deadline or until all funds are expended, whichever date occurs first. Applications will be evaluated based on the CPRG/INVEST CLEAN Workplan, including verification that the project meets all specified requirements for this program. Funding determination will be done on a project-by-project basis and if feasible, funding will be distributed geographically.

Be aware that there is a possibility that, due to program priorities and funding category limitations (i.e., caps), project applicants may be offered only partial funding.

5.1 Grounds for Rejection

An application may be immediately rejected if the application:

- Does not include the correct documentation and other forms required.
- Was not submitted by an individual authorized to represent the firm.
- Does not meet the conditions laid out in the application prior to submission.

5.2 Disposition of Applications

The South Coast AQMD reserves the right to reject any or all applications. All responses become the property of the South Coast AQMD. A digital copy of the application shall be retained for South Coast AQMD files.

5.3 Modification or Withdrawal

Once submitted, applications cannot be altered without the prior written consent of South Coast AQMD. In addition, Conflict of Interest and Project Cost information, as described below, must also be submitted with the application. It is the responsibility of the applicant to ensure that all information submitted is accurate and complete.

Section 6 – Funding & Conditions

6.1 Payment

Selected Measure 3 projects will be paid on a reimbursement basis in accordance with the rebate agreement. The payment will be made after the BE CHE is delivered and the old unit is scrapped. The final invoice must be submitted with supporting documents no later than February 28, 2028 unless extended at the sole discretion of South Coast AQMD. The agreement term under this PA will end five years from the date the equipment is commissioned to ensure operation of the equipment for at least 5 years.

The Awardee will be encouraged to obtain the most recent price estimate during application submittal and place the purchase order as soon as the agreement is executed to secure the equipment pricing. It is recommended that applicants work with vendors on the timeline of when the units will be delivered and in service and adjust pricing accordingly.

6.2 Inspections

Inspections will be performed on the CHE approved for funding per the agreement terms. Inspections of equipment may be conducted in person or virtually via remote inspections. Recipients must make all equipment available for in-person or remote inspections, unless otherwise specified within the agreement, or through updates from South Coast AQMD. Each Awardee funded under each measure is subject to inspection based on the South Coast AQMD and the U.S. EPA's discretion.

6.3 Reporting

Selected Awardees will be required to submit semi-annual reports. Awardees will be provided with data collection requirements to ensure the South Coast AQMD has the necessary data to evaluate project performance. The data may be collected in real-time or through telematic equipment, which may include, but will not be limited to, CHE availability (percent of time the BE CHE is ready and available for use), duty cycle coverage (percent of typical diesel CHE tasks completed within one full battery cycle), hours operated, maintenance and operating costs, operational fit, interoperability and operator feedback, miles traveled, energy used, charging frequency, charging rate, charger uptime downtimes and other challenges encountered during the reporting period. Awardees must ensure that performance data is provided and that the usage requirements in the agreement are met. South Coast AQMD reserves the right to verify the information provided via inspection.

A designated third-party contractor may collect and analyze vehicle data to verify the Measure's performance.

6.4 Agreement Structure

An agreement will be executed with the South Coast AQMD and the owner for the deployment of the BE CHE. This agreement will outline the Awardee's responsibilities, milestones, and deliverables.

6.5 Performance

When an Awardee is unable to meet the program requirements (e.g., annual reporting, operation, etc.) or terms specified in the agreement, South Coast AQMD may consider the options to remedy the violation before seeking enforcement action. In addition, when an Awardee cannot meet the average usage requirements or terms specified in the agreement, South Coast AQMD may consider an extension of the contract to address non-performance.

Options to address or remedy non-performance include, but are not limited to, the following:

- Extending the project agreement to allow for the makeup of the usage requirement shortfall
- Transfer ownership of the BE CHE to another entity committed to complying with the agreement and operating of the BE CHE

- The owner will make its best effort to assist with identifying a new operator and maintain the CHE in operating condition until transfer of ownership is complete.
- South Coast AQMD and US EPA will review and approve the justification for the deployment failure before any ownership transfer can be authorized.

6.6 Closeout

If selected for funding, closeout of the agreement can occur once all required documentation has been received and the Awardee has fulfilled all obligations. In addition, the Awardee agrees to use the BE CHE(s) purchased under the INVEST CLEAN program for the purpose for which it was acquired, and for the duration of its useful life. After the end of the five-year grant period, the BE CHE(s) may be retained, sold, or otherwise disposed of with no further obligation to the US EPA or South Coast AQMD.

6.7 Access to Records and Retention

Materials, reports, photos, and other documentation submitted pursuant to the project may be released in part or in whole pursuant to either the Freedom of Information Act or the California Public Records Act. The US EPA or South Coast AQMD may make publicly available on their websites copies or portions of project information.

US EPA and South Coast AQMD also reserve the right to access records of the Awardee pertinent to this award, to perform audits, execute site visits, or for any other official use. This right of access also includes timely and reasonable access to the Awardee's personnel for the purpose of interviewing and discussion related to such documents or the Federal award in general. This right of access shall continue as long as the records are retained.

In accordance with 2 CFR 200.334, the recipient must retain all Federal award records, including but not limited to, financial records, supporting documents, and statistical records for at least three (3) years from the date of submission of the final financial report. The records must be retained until all litigation, claims, or audit findings have been resolved and final action has been taken if any litigation, claim, or audit is started before the expiration of the three-year period. Examples of the required records include: (1) time and attendance records and supporting documentation; and (2) documentation of compliance with statutes and regulations that apply to the project. In accordance with 2 CFR 200.337, the US EPA, the Inspector General, the Comptroller General, and the pass-through entity, or any of their authorized representatives, have the right of access to any documents, papers or records of the recipient which are pertinent to the grant award. The rights of access are not limited to the required retention period, but last as long as the records are retained.

6.8 Use of Logos

Use of the US EPA's logo, along with logos of other participating entities, on outreach materials, websites, or reports, must adhere to the requirements of both the General Terms and Conditions, Paragraph Q, and California Health and Safety Code Section 40730.

6.9 Statement of Compliance

Government Code Section 12990 and California Administrative Code, Title II, Division 4, Chapter 5, require employers to agree not to unlawfully discriminate against any employee or Applicant because of race, religion, color, national origin, ancestry, physical handicap, medical condition, marital status, sex, or age. A statement of compliance with this clause is included in all South Coast AQMD agreements for the Program.

6.10 Compliance with Applicable Laws

Applicants must comply with all federal, state, and local laws, ordinances, codes and regulations. If the application is selected for a funding award, all vehicles/equipment to be purchased or installed must be compliant with all applicable federal, state, and local air quality rules and regulations, and will maintain compliance for the full agreement term.

6.11 Conflict of Interest

Applicant must address any potential conflicts of interest with other clients affected by actions performed by the firm on behalf of South Coast AQMD. Although the Applicant will not be automatically disqualified by reason of work performed for such firms, the South Coast AQMD reserves the right to consider the nature and extent of such work in evaluating the application. Conflicts of interest will be screened on a case-by-case basis by the South Coast AQMD General Counsel's Office. Conflict of interest provisions of the state law, including the Political Reform Act, may apply to work performed pursuant to this program.

6.12 Compliance with Labor Laws

If an application is deemed eligible, the Applicant will be required to disclose any labor violations that have occurred within the last three years to be further considered for an award. If awarded, the recipient will be required to notify South Coast AQMD in writing if they have been found by a court or federal or state agency to have violated labor laws. The recipient will complete a yearly certification in which they will either state that they have not been found by a court or federal or state agency to have violated labor laws or, if such violations have been found, the recipient will give South Coast AQMD details about those violations in the certification. If the recipient has previously provided that information to the South Coast AQMD, they will be required to reattach that previous notification to the certification and provide any additional details about those violations that have not previously been provided. The recipient's yearly certification will be due at the same time as the annual progress reports. South Coast AQMD reserves the right to terminate the agreement with a recipient that has been found to have violated labor laws, and the recipient

may be required to return any and all funds, as determined by South Coast AQMD. The recipient will also ensure that these requirements are included in all downstream partnerships.

6.13 Economic Sanctions (Russia/Ukraine)

On March 4, 2022, Governor Gavin Newsom issued Executive Order N-6-22 (EO) regarding economic sanctions in response to Russian aggression in Ukraine. Applicants who are considered eligible for funds under this PA and who have received executed agreements from South Coast AQMD, are obligated to comply with existing economic sanctions imposed by the U.S. government in response to Russia's actions in Ukraine.

Section 7 – INVEST CLEAN Contact Information

This program announcement and additional information and resources pertaining to the INVEST CLEAN Program can be obtained from the INVEST CLEAN website at:

<https://www.aqmd.gov/home/technology/implementation/invest-clean>

South Coast AQMD staff members are available to answer questions during the application period. To expedite assistance, please direct your inquiries to investclean-che@aqmd.gov.

ATTACHMENT A – PROJECT INFORMATION FORM

Please be prepared to provide the following information as prompted by the INVEST CLEAN GMS.

APPLICANT INFORMATION

| |
|----------------------|
| Applicant Legal Name |
| Business Address |
| City, State and Zip |
| Phone |
| Contact Name |
| Title |
| E-mail Address |

PROJECT DESCRIPTION

| |
|---|
| <p>Existing Equipment Information:</p> <ul style="list-style-type: none"> • Equipment Make • Equipment Model • Equipment Model year • Equipment Serial Number • Primary Yard address • DOORS EIN (if registered in DOORS) • Regulatory Compliance Documents for the company (for all applicable regulations) |
| <p>Existing Engine Information:</p> <ul style="list-style-type: none"> • Engine Fuel Type • Engine Make • Engine Model • Engine Model Year • Engine Serial Number • Engine Family Number • ARB Certification Engine Executive Order Number |
| <p>Operational Information</p> <ul style="list-style-type: none"> • Percent Operation in 2 MSA’s • Projected Future Percent Operation in 2 MSA’s • Projected Future Annual Usage Hours • Current Hour Meter Reading |
| <p>Replacement Equipment Information</p> <ul style="list-style-type: none"> • Replacement Equipment Make • Replacement Equipment Model • Replacement Equipment Model Year • CARB Certification or Approval Letter certifying the equipment as zero emission |

PROJECT COST BREAKDOWN

| |
|---|
| Amount requested from South Coast AQMD |
| Replacement vehicle Cost (Including Tax) |
| Vendor Information: <ul style="list-style-type: none"> • Vendor Name • Vendor Contact Name • Vendor Phone Number • Vendor Address |

APPLICATION FUNDING SUMMARY

| |
|---|
| Total Amount requested from South Coast AQMD for all projects |
| Total Amount to be paid by Applicant for all projects |
| Funding From other Sources: <ul style="list-style-type: none"> • Total Amount to be paid by other funding Sources for all projects • Name of Funding Entity • Funding Amount |
| Total Cost of all projects in application |

REQUIRED ATTACHMENTS:

| |
|---|
| <ul style="list-style-type: none"> • Compliance documentation for entire fleet for all applicable regulations (CHE, WAIRE, Off-Road Diesel Regulation) • Proof of Ownership • Photo of Existing Equipment Serial Number for equipment that will be scrapped • Photo of Existing Engine Emission Control Label for equipment that will be scrapped • Photo of Existing Engine Info/Serial Number Tag for an engine that will be scrapped • ARB Certification Engine Executive Order for scrapped Engine (if applicable) • Photo of Current Hour Meter Reading • Equipment Operational Records for past 12 months • New Equipment Quote with 3 Year Warranty (dated within 90 Days) • ARB Certification Engine Executive Order for Replacement Engine • Business Information Request (BIR) • Campaign Contribution Disclosure • W-9 Request for Taxpayer Identification Number and Certification • Direct Deposit Form • 590 Withholding Exemption Certificate • Certificate Regarding Debarment, Suspension, and Other Responsibility Matters • Labor Law Compliance form |
|---|



**South Coast
Air Quality
Management District**

INVEST CLEAN



Program Announcement

#PA2026-02

Measure 2.1 - Battery Electric Freight Vehicle Deployment Incentive Program

Accepting Applications: August 15, 2025, at 12 PM PT
Submission Deadline: November 28, 2025, at 12 PM PT

INTRODUCTION

In July 2024, US EPA awarded funds to the South Coast Air Quality Management District (South Coast AQMD) to implement INVEST CLEAN in Los Angeles-Long Beach-Anaheim and Riverside-San Bernardino-Ontario Metropolitan Statistical Areas (MSAs). The two MSAs include the following four counties: Los Angeles, Orange, Riverside, and San Bernardino. INVEST CLEAN targets the limiting factors and challenges to the electrification transformation of the Southern California goods movement corridor.

The purpose of this Program Announcement (PA) is to solicit project applications for INVEST CLEAN – Measure 2.1: Battery Electric Freight Vehicle Deployment Incentive Program. This Program will provide funding rebates for the transition of goods movement operations to advanced technologies and reduce emissions by replacing heavy-duty Class 8 diesel freight delivery vehicles with Class 8 trucks that are powered by battery-electric technology.

SECTION 1 – PROGRAM OVERVIEW

The total rebate funding for Measure 2.1: Battery Electric Freight Vehicle Deployment Incentive Program is approximately \$28,000,000 from the INVEST CLEAN funds awarded to the South Coast AQMD. All applications will be evaluated based on the requirements set forth in this PA, which align with the INVEST CLEAN workplan and the Terms and Conditions of the grant awarded to INVEST CLEAN.

WHO: Applicants may be public or private entities currently operating a Class 8 vehicle for goods movement. Eligible applicants are asset-owners/operators.

WHAT: Incentives under this PA are rebate-based and limited to the replacement of diesel-fueled Class 8 trucks with Class 8 trucks powered by battery-electric technology. Only Class 8 (GVWR 33,001 pounds or higher) goods movement trucks are eligible for this rebate. An equivalent baseline truck that will be scrapped must be diesel-fueled.

HOW: Applications must be submitted online through South Coast AQMD's Grant Management System (GMS), which can be found at:
<http://www.aqmd.gov/investclean>

WHEN: Applications can be submitted starting August 15, 2025, at 12 PM PT and the application period closes on November 28, 2025 at 12 PM PT or until program funds are exhausted.

| Item | Date |
|-------------------|------------------------------|
| Issue PA2026-02 | August 1, 2025 |
| Applications Open | August 15, 2025, at 12 PM PT |

| | |
|--------------------------------|--|
| Deadline to Submit Application | November 28, 2025, at 12 PM PT or until funds are expended (whichever comes earlier) |
| Agreement Execution | January 2026 through August 2027 |
| Performance and usage tracking | Commencing after Deployment |

ALL APPLICATIONS MUST BE RECEIVED VIA SOUTH COAST AQMD’S ONLINE GRANT MANAGEMENT SYSTEM (GMS)

1.1 - GENERAL PROGRAM INFORMATION

Incentive funding under this PA is rebate-based. Only diesel Class 8 goods movement trucks are eligible for a rebate under this Program. South Coast AQMD staff will evaluate all applications submitted online as they are received until the application deadline, or until all funds are exhausted, whichever date occurs first.

Eligible Participant

- The applicant must provide proof of compliance with applicable fleet/truck regulations during the application process.
- If awarded, the applicant must enter into a written Agreement with South Coast AQMD as a condition of receiving rebate funds. See SECTION IV – PROJECT AGREEMENT
- The applicant must agree to adhere to all applicable Terms and Conditions. See SECTION VI – LEGAL UPDATES AND DEFINITIONS

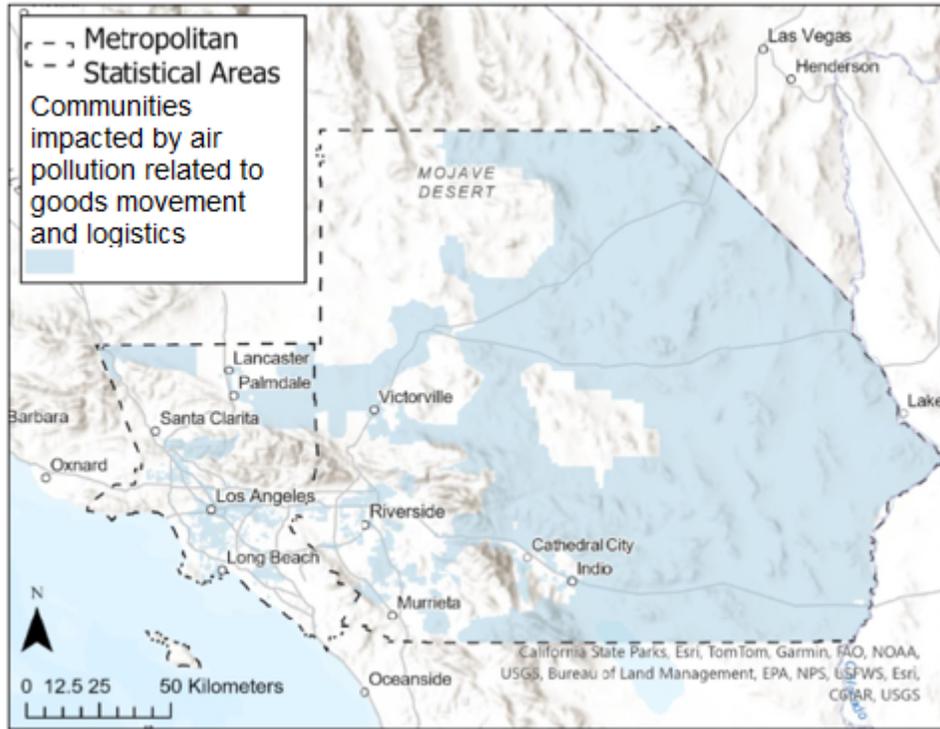
Eligible Existing Vehicle

- The existing vehicle must be diesel-powered.
- The existing vehicle must be domiciled and have operated at least 75% within either one or both MSAs for the prior 12 months from application submittal. The MSA regions are shown in the dotted areas on the map below in Figure 1, which include the four counties: Los Angeles, Orange, Riverside, and San Bernardino.
- The existing vehicle must have operated a minimum of 7,000 miles during the 12 months prior to application.

Eligible Replacement Vehicle

- The replacement vehicle must be brand new and battery-electric powered.
- The replacement vehicle must not be powered by hydrogen or any fossil fuels.
- The replacement vehicle must not be a retrofit, repower, or conversion.
- The replacement vehicle must be deployed no later than February 2028.
- The replacement vehicle must operate at least 75% within one or both of the MSAs for a minimum of 5 years after vehicle deployment.

Figure 1: Area inside dotted line represents the two MSAs qualified territories



1.2 - ELIGIBLE FUNDING AMOUNT

Each eligible Class 8 truck project will receive a rebate amount up to \$400,000. While Program grants can be combined with other non-federal grants and incentives, in no case may the total grant/rebate funds be greater than 100% of a project’s total cost, as explained in Section 1.3 below.

1.3 - PROJECT COST

All project costs must be clearly indicated in the application. Applicants must provide an itemized dealership or manufacturer quote for the replacement vehicle. Sales tax, Federal Excise Tax (FET), and delivery fees are eligible costs under the INVEST CLEAN program. Please note that any combined incentive funds with this opportunity cannot exceed the cost of the replacement truck.

1.4 – PROGRAM WORKFLOW

The flowchart in Figure 2 depicts the evaluation process of a typical replacement project, while Table 1 below provides a detailed explanation of each step. Projects will begin with an online application, followed by a project evaluation conducted by South Coast AQMD staff. This will be followed by the execution of Agreements, project implementation, invoicing and reimbursement, and required reporting.

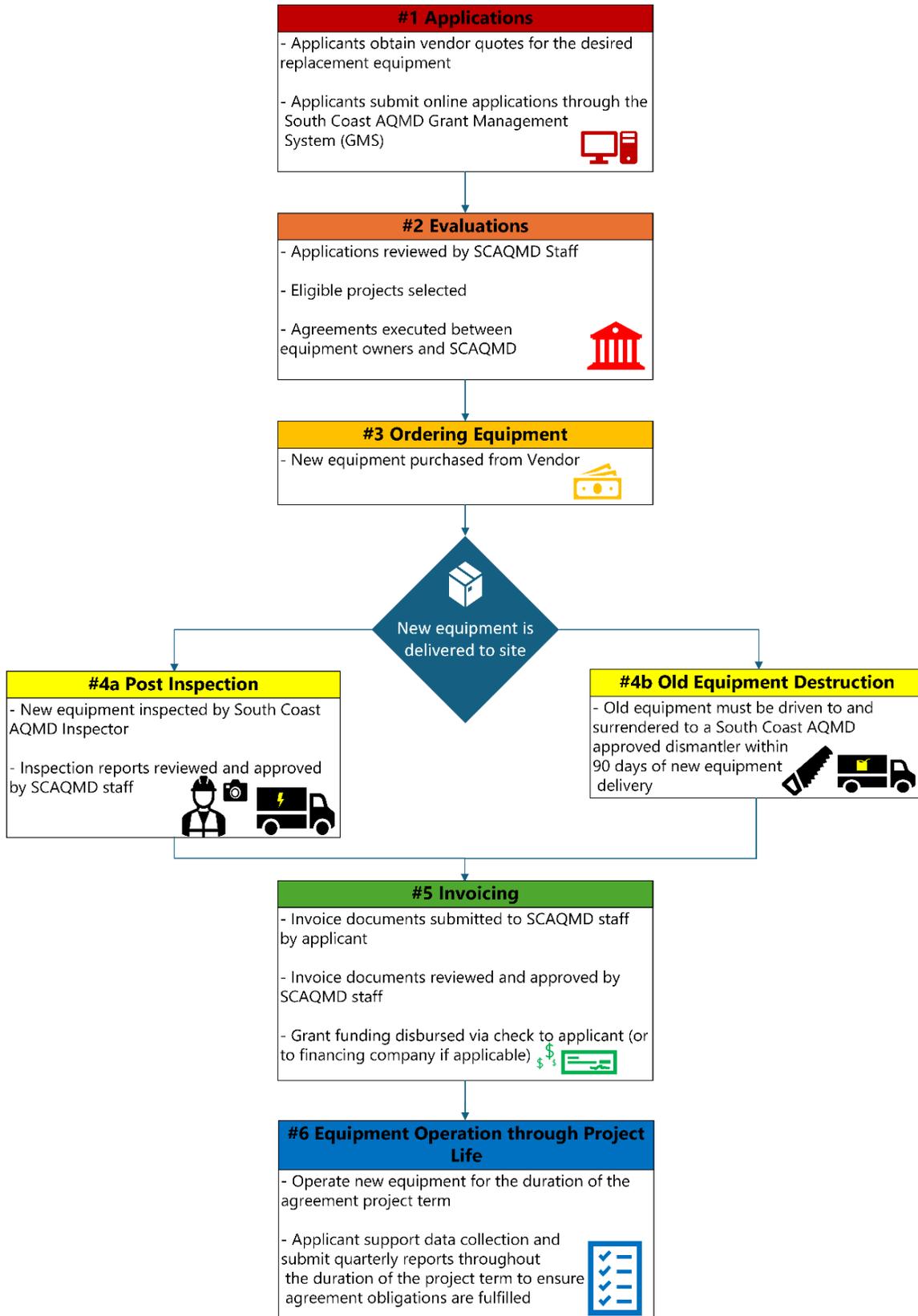


Figure 2: Lifecycle for Battery Electric Class 8 Vehicle Replacement Projects

Table 1-Step-by-Step Explanation

| Chart Process # | Description of Process |
|--|--|
| 1 | Applicants submit INVEST CLEAN grant applications online through South Coast AQMD's Grant Management System (GMS). Applicants must provide all required information and documentation as prompted by the GMS. |
| 2 | Upon receipt of a submitted application, South Coast AQMD staff will review the application to screen for completeness and project eligibility. If additional information, documentation or corrections are required, South Coast AQMD staff will allow the applicant 14 calendar days to provide a response to the request. Eligible applications will be approved for funding as project reviews are completed and approved with priority determined by the application submittal date. If an applicant has been approved for funding, an agreement will be executed between the applicant and South Coast AQMD. |
| 3 | Once an Agreement has been fully executed, the applicant, now Awardee, may proceed to order and purchase the new/replacement vehicle from the vehicle dealer/vendor. |
|  | New/replacement vehicle is delivered to the applicant. The Awardee must inform South Coast AQMD staff upon delivery of project vehicle. |
| 4a | Inspection of the new vehicle is required. A South Coast AQMD Inspector will coordinate an inspection date and time with the Awardee directly. Inspections may be performed either on-site or via video or photograph(s) at the inspector's discretion. |
| 4b | Upon delivery of the new/replacement vehicle, the awardee will have 90 days to surrender the old/baseline vehicle to the authorized dismantler. |
| 5 | Awardee will submit an itemized invoice to South Coast AQMD to request payment. South Coast AQMD will confirm that the Awardee has met all program and agreement requirements prior to rebate payment. |
| 6 | Awardee will allow a South Coast AMD designated data collection organization to track data for the operation of the new vehicle (See pg. 10 Data Collection). Awardee will meet program requirements and submit semi-annual reports to the South Coast AQMD. |

SECTION 2 – APPLICATION SUBMITTAL REQUIREMENTS

The electronic application in the GMS will prompt applicants to provide all required application information. **Attachment A** provides a listing of required application information. It is the responsibility of the Applicant to ensure that all information submitted to South Coast AQMD's GMS is accurate and complete.

All online applications must be submitted in accordance with the specifications set forth herein. Failure to adhere to these specifications may be cause for rejection of the application without evaluation.

Grounds for Rejection:

An application may be immediately rejected if the application:

- Does not submit all the required information and documentation via GMS.
- It is not signed by an individual authorized to represent the firm.

Certifications and Representations:

South Coast AQMD “Business Information Forms” requiring signatures will be available on the GMS and are required to be submitted with the Application.

Methods of Delivery:

The applicant must submit the application using the South Coast AQMD’s GMS. Multiple projects may be entered into a single application. Applicants are required to perform the first and final steps of initiating and submitting applications; however, the application may be filled in by a third-party consultant.

Disposition of Applications:

The South Coast AQMD reserves the right to reject any or all applications. All responses become the property of the South Coast AQMD. The electronic copy of the application shall be retained for South Coast AQMD files. Please review the Access to Records and Retention disclaimer in SECTION 6 – LEGAL UPDATES AND DEFINITIONS.

Modification or Withdrawal:

Ensure that the information input and documentation uploaded are accurate and complete. Once submitted, applications cannot be altered. Applicants may submit more than one application per solicitation. Applications can be withdrawn through the GMS system.

SECTION 3 – APPLICATION EVALUATION

South Coast AQMD staff will evaluate and qualify submitted applications as they are received to approve the project(s) to be funded. South Coast AQMD staff may request additional information, documentation or updates based on their application review. Applicants will be allowed 14 calendar days to provide a response to the request.

Funds may be distributed based on applications received to target areas most heavily impacted by goods movement and ensure geographic distribution. To the extent feasible, South Coast AQMD will ensure that funding is balanced across the two Metropolitan Statistical Areas (MSAs): Los Angeles-Orange County MSA and Inland Empire MSA. Some funds may be reserved initially to ensure the funds are available to both MSAs.

There is a possibility that due to large program interest that applicants may be offered partial funding and not all eligible applications may be funded.

SECTION 4 –AGREEMENT

All applicants that are selected for funding awards must enter a written Agreement with the South Coast AQMD and will be considered rebate recipients, or Awardees.

Note: The South Coast AQMD has no obligation to fund a project until an Agreement is fully executed by both parties.

The scope of work will include tasks and deliverables that demonstrate compliance with the requirements of the EPA-funded INVEST CLEAN Program administered by South Coast AQMD.

Agreements will include, but not be limited to, the following requirements:

- Be available for a follow-up inspection by South Coast AQMD, if requested.
- Existing vehicles must be scrapped.
- Provision of data to ensure monitoring and compliance through telematics or other travel logs as appropriate.
- Register the new/replacement vehicle in California with the Department of Motor Vehicles (DMV).
- Maintain insurance on the new/replacement vehicle as required by law.
- Ensure the operation of the new/replacement vehicle is within one of the MSAs and provide all necessary progress reports.
- The funded vehicle is required to maintain a minimum of 7,000 miles a year, and 75% of which must be within the two MSAs for the entire operating period.
- Ensure the new vehicle is operated and maintained with proper maintenance throughout the Agreement term.
- The replacement vehicle is to have at least a three-year manufacturer's warranty.
- Ensure that vehicle operation is restricted specifically to goods movement.

4.1 - INSPECTIONS

Inspections will be performed on the new vehicles approved for funding. Additional inspections of old vehicles/engines or destruction of old vehicles may be conducted at the discretion of South Coast AQMD. Inspections of vehicles/engines may be conducted virtually via remote inspections. Recipients must make all vehicles available for in-person or remote inspections unless otherwise specified within the Agreement, or through updates from South Coast AQMD.

4.2 - SCRAPPING REQUIREMENTS

The existing vehicle must be scrapped according to the following criteria:

- Existing vehicle must be driven, not towed, to a South Coast AQMD-approved dismantler. A dismantler receipt must be collected by the applicant and provided to South Coast AQMD before the rebate can be processed.
- Existing vehicle must be scrapped within ninety (90) days of the dismantler's receipt

- The scrapping method must include drilling a three-inch asymmetrical hole in the engine block and cutting the frame rail.
- Evidence of destruction will be provided to the Awardee by the approved dismantler and must include digital photos of VIN tag, front, side profile, and rear of the vehicle, engine tag, before and after photos of the destroyed engine block, and cut frame rails or other cut structural components as applicable. The Awardee must submit this documentation to South Coast AQMD per the Agreement terms.

On a case-by-case basis depending on the condition and emission rate of the vehicle, South Coast AQMD may allow vehicles to be used for other programs to reduce emission rates within the South Coast AQMD region.

4.3 - DATA COLLECTION

For the duration of the 5-year operating period, recipients shall allow installation of data loggers to enable real-time data submission or remote access to the South Coast AQMD Contractor, the designated third-party data verification organization under INVEST CLEAN. A designated data collection organization will collect and analyze operational data for this Program. Recipients may request to withhold business-sensitive data, provided this does not compromise the data collection objectives. Note that such requests will not abrogate or modify the provisions of Government Code Section 7920 et seq. (Public Records Act). Specific data collection and reporting procedures will be provided to recipient by the designated data collection organization.

4.4 - DELIVERABLES

The Agreement will describe how the project will be monitored and what type of information will be included in project progress reports for the duration of the 5-year operating period. At a minimum, the South Coast AQMD expects to receive the following:

- Semi-Annual reports consisting of:
 - Vehicle Miles Traveled (VMTs)/energy usage,
 - vehicle registration, vehicle insurance, and
 - other information as requested by the South Coast AQMD

South Coast AQMD reserves the right to verify the information provided. Please review the Access to Records and Retention disclaimer in SECTION 6 – LEGAL UPDATES AND DEFINITIONS.

4.5 - PERFORMANCE

When an Awardee is unable to meet the program requirements (e.g., semi-annual reporting, operation, emission benefits, etc.) or terms specified in the Agreement, South Coast AQMD may consider the options to remedy the violation before seeking enforcement action. In addition, when a recipient cannot meet the average usage requirements or terms specified in the Agreement, South Coast AQMD may consider that the average usage is less than the activity required in the Agreement and seek remediation.

Options for non-performance include, but are not limited to, the following:

- Extending the project Agreement to allow for the makeup of the usage requirement shortfall
- The owner will make its best effort to repair the vehicle and assist with identifying a new operator.
- SOUTH COAST AQMD and EPA will review and approve the justification for the deployment failure before any ownership transfer can be authorized.

SECTION 5 – PAYMENT TERMS

To receive a rebate payment, the Awardee must submit:

- Proof of vehicle purchase, including signed sale agreements and proof of payments.
- Proof of replacement vehicle registration, vehicle insurance, and warranty information
- Proof of fleet compliance with applicable fleet/truck regulations
- Proof that the existing vehicle was surrendered to an authorized dismantler

Payment will be made upon review and approval of the documentation listed above, verification via inspection of new vehicle deployment, and verification via inspection of old/existing vehicle destruction/proof of destruction.

All payment requests must be submitted by February 2028.

SECTION 6 – LEGAL UPDATES AND DEFINITIONS

6.1 - CONFIDENTIALITY

Please ensure that any trade secret, confidential or proprietary information being provided is marked accordingly. Please see the following website for more details:

<https://www.aqmd.gov/docs/default-source/default-document-library/Guidelines/praguidelines.pdf>

6.2 - ACCESS TO RECORDS AND RETENTION

Materials, reports, photos, and other documentation submitted pursuant to the project may be released in part or in whole pursuant to either the Freedom of Information Act or the California Public Records Act. The US EPA or South Coast AQMD may make publicly available on their websites, copies or portions of project information.

EPA and South Coast AQMD, or their authorized representatives, also reserve the right to access records of the applicant/recipient pertinent to this award, to perform audits, execute site visits, or for any other official use. This right of access also includes timely and reasonable access to the applicant/recipient's personnel for the purpose of interviewing and having discussions related to such documents or the Federal award in general. This right of access shall continue as long as the records are retained.

In accordance with 2 CFR 200.334, the recipient must retain all Federal award records, including but not limited to, financial records, supporting documents, and statistical records for at least three years from the date of submission of the final financial report. The records must be retained until all litigation, claims, or audit findings have been resolved and final action has been taken if

any litigation, claim, or audit is started before the expiration of the three-year period. Examples of the required records include: (1) time and attendance records and supporting documentation; and (2) documentation of compliance with statutes and regulations that apply to the project. In accordance with 2 CFR 200.337, the EPA, the Inspector General, the Comptroller General, and the pass-through entity, or any of their authorized representatives, have the right of access to any documents, papers or records of the recipient which are pertinent to the grant award. The rights of access are not limited to the required retention period, but last as long as the records are retained.

6.3 - USE OF LOGOS

Use of the EPA's logo, along with logos of other participating entities, on outreach materials, websites, or reports, must adhere to the requirements of both the General Terms and Conditions, Paragraph Q, and California Health and Safety Code Section 40730.

6.4 - STATEMENT OF COMPLIANCE

Government Code Section 12990 and California Administrative Code, Title II, Division 4, Chapter 5, require employers to agree not to unlawfully discriminate against any employee or Applicant because of race, religion, color, national origin, ancestry, physical handicap, medical condition, marital status, sex, or age. A statement of compliance with this clause is included in all South Coast AQMD Agreements for the Program.

6.5 - COMPLIANCE WITH APPLICABLE LAWS

Applicants must comply with all federal, state, and local laws, ordinances, codes and regulations. If the application is selected for a funding award/rebate, all vehicles/equipment to be purchased or installed must be compliant with all applicable federal, state, and local air quality rules and regulations, and will maintain compliance for the full Agreement term.

6.6 - CONFLICT OF INTEREST

Applicants must address any potential conflicts of interest with other clients affected by actions performed by the firm on behalf of South Coast AQMD. Although the Applicant will not be automatically disqualified by reason of work performed for such firms, the South Coast AQMD reserves the right to consider the nature and extent of such work in evaluating the application. Conflicts of interest will be screened on a case-by-case basis by the South Coast AQMD General Counsel's Office. Conflict of interest provisions of the state law, including the Political Reform Act, may apply to work performed pursuant to this program.

6.7 - COMPLIANCE WITH LABOR LAWS

If an application is deemed eligible, the Applicant will be required to disclose any labor violations that have occurred within the last three years to be further considered for an award. If awarded, the recipient will be required to notify South Coast AQMD in writing if they have been found by a court or federal or state agency to have violated labor laws. The recipient will complete a yearly certification in which they will either state that they have not been found by a court or federal or state agency to have violated labor laws or, if such violations have been found, the recipient will give South Coast AQMD details about those violations in the certification. If the recipient has previously provided that information to the South Coast AQMD, they will be required to reattach that previous notification to the certification and provide any

additional details about those violations that have not previously been provided. The recipient's certification will be due at the same time as the semi-annual progress reports. South Coast AQMD reserves the right to terminate the Agreement with a recipient that has been found to have violated labor laws, and the recipient may be required to return any and all funds, as determined by South Coast AQMD. The recipient will also ensure that these requirements are included in all downstream partnerships.

6.8 - ECONOMIC SANCTIONS (RUSSIA/UKRAINE)

On March 4, 2022, Governor Gavin Newsom issued Executive Order N-6-22 (EO) regarding sanctions in response to Russian aggression in Ukraine. Applicants who are considered eligible for funds under this PA and receive executed Agreements from South Coast AQMD, are obligated to comply with existing economic sanctions imposed by the U.S. government in response to Russia's actions in Ukraine.

DEFINITIONS

1. Agreement Term

Agreement term is the duration for which the Agreement is valid. It encompasses both the project completion and project implementation periods:

- i. Project completion period is the first part of the Agreement term starting from the date of Agreement execution by both parties to the date the project post-inspection confirms that the project has become operational.
- ii. Project implementation period is the second part of the Agreement term and equals the operating period.

2. South Coast AQMD Jurisdiction

The South Coast AQMD is the air pollution control agency for all of Orange County and the urban portions of Los Angeles, Riverside and San Bernardino counties. Within Riverside County, the South Coast AQMD also has jurisdiction over the Salton Sea Air Basin and a portion of the Mojave Desert Air Basin. This area of 10,743 square miles is home to approximately 17 million people—about half the population of the state of California. It is the second most populated urban area in the United States and one of the smoggiest. Visit <http://www.aqmd.gov/nav/about/jurisdiction> for more information.

3. Goods Movement

“Goods” are defined as having the same meaning in Commercial Code section 2105, which essentially requires that: The goods must be movable; and the goods being moved must be part of a transaction that involves a contract for the sale of the goods.

WORKSHOP AND ADDITIONAL INFORMATION/ASSISTANCE:

This program announcement and additional information and resources pertaining to the INVEST CLEAN Program can be obtained from the INVEST CLEAN website at:

<https://www.aqmd.gov/investclean>

Additionally, information on virtual pre-recorded presentations and other meetings (as needed) are to be posted on the INVEST CLEAN website.

South Coast AQMD staff members are available to answer questions during the application period. To expedite assistance, please direct your inquiries to investclean-onroad@aqmd.gov.

ATTACHMENT A – PROJECT INFORMATION FORM

Please be prepared to provide the following information as prompted by the INVEST CLEAN GMS.

APPLICANT INFORMATION

| |
|---------------------|
| Applicant Name |
| Business Address |
| City, State and Zip |
| Phone |
| Contact Name |
| Title |
| E-mail Address |

FLEET INFORMATION

| |
|--|
| What is your current fleet size? |
| Is your company registered in TRUCRS |
| Provide TRUCRS ID (enter NA if not applicable) |

PROJECT DESCRIPTION

| |
|---|
| <p>Existing Vehicle Information:</p> <ul style="list-style-type: none"> • VIN • Vehicle Make • Vehicle Model • Vehicle Model year • GVWR • License plate • CHP CA Number • Primary Yard address • Regulatory Compliance Documents (for all applicable regulation) • Vocation of the Vehicle |
| <p>Existing Engine Information:</p> <ul style="list-style-type: none"> • Engine Fuel Type • Engine Make • Engine Model • Engine Model Year • Engine Serial Number |

| |
|---|
| <ul style="list-style-type: none"> • Engine Family Number • ARB Certification Engine Executive Order Number |
| <p>Operational Information</p> <ul style="list-style-type: none"> • Total annual mileage and % Operation within the two (2) MSAs for existing vehicle • Projected Future % Operation within the two (2) MSAs • Projected Future Annual Mileage • Current Odometer Reading |
| <p>Replacement Vehicle/Engine Information</p> <ul style="list-style-type: none"> • Replacement Vehicle Make • Replacement Vehicle Model • Replacement Vehicle Model Year • Replacement Vehicle GVWR • Primary Yard Address • Replacement Engine Make • Replacement Engine Model • Replacement Engine Model Year • ARB Certification Engine Executive Order Number • Odometer Reading of Replacement Vehicle |

PROJECT COST BREAKDOWN

| |
|--|
| Amount requested from South Coast AQMD |
| Replacement vehicle Cost (Including Tax) |
| <p>Vendor Information:</p> <ul style="list-style-type: none"> • Vendor Name • Vendor Contact Name • Vendor Phone Number • Vendor Address |

APPLICATION FUNDING SUMMARY

| |
|---|
| Total Amount requested from SOUTH COAST AQMD for all projects in this Category (Class 8 On-Road Vehicles) |
| Total Amount to be paid by Applicant for all projects in this Category (Class 8 On-Road Vehicles) |
| Application # for any other applications in this solicitation from other Program Categories (i.e. CHE, infrastructure) |
| <p>Funding From other Sources:</p> <ul style="list-style-type: none"> • Name of Funding Entity • Funding Amount |
| Total Cost of all vehicle rebate requests in this Category (Class 8 On-Road Vehicles) |

REQUIRED ATTACHMENTS:

- Compliance documentation for entire fleet for all applicable regulations
- Vehicle Title for vehicle to be scrapped
- Photo of VIN label
- Photo of GVWR label
- Photo of Engine Emission Control Label
- Photo of Engine Info/Serial Number Tag
- ARB Certification Engine Executive Order for Existing Engine
- Photo of Current Odometer Reading
- Insurance for the past 12 months
- Registration for the past 12 months
- Odometer/Operational/GPS Records for past 12 months
- New Vehicle Quote
- ARB Certification Engine Executive Order for Replacement Engine
- Business Information Request (BIR)
- Campaign Contribution Disclosure
- W-9 Request for Taxpayer Identification Number and Certification
- Direct Deposit Form
- 590 Withholding Exemption Certificate
- Certificate Regarding Debarment, Suspension, and Other Responsibility Matters
- Labor Law Compliance form



South Coast
Air Quality
Management District

INVEST CLEAN



Program Announcement

#PA2026-03

Charging Infrastructure Deployment Incentive Program

Accepting Applications: August 15, 2025, at 12 PM PT
Submission Deadline: November 28, 2025, at 12 PM PT

In July 2024, U.S. EPA awarded funds to the South Coast Air Quality Management District (South Coast AQMD) to implement INVEST CLEAN in Los Angeles-Long Beach-Anaheim and Riverside-San Bernardino-Ontario Metropolitan Statistical Areas (MSAs). The two MSAs include the following four counties: Los Angeles, Orange, Riverside, and San Bernardino. INVEST CLEAN targets the limiting factors and challenges to the electrification transformation of the Southern California goods movement corridor.

INVEST CLEAN comprises four incentive measures to modernize the goods movement sectors. South Coast AQMD is soliciting applications under each individual measure. This Program Announcement (PA) is to solicit projects¹ under Measure 1: Charging Infrastructure Deployment Incentive Program (Program). This Program will provide incentive funding to support the development of fast charging infrastructure that facilitates the timely deployment of battery-electric medium and heavy-duty vehicles, as defined in Table 1, including Class 4 to 8 goods movement vehicles in the region.

SECTION I – OVERVIEW & ELIGIBILITY REQUIREMENTS

The total incentive funding for this measure is \$178,500,000. All applications will be evaluated based on the criteria set forth in this PA, which align with the INVEST CLEAN Workplan approved by EPA and the Terms and Conditions of the EPA grant.

WHO: Entities directly responsible for planning, designing, constructing, and operating a charging station. Applicants can be charging station developers and operators, fleet operators, truck stop operators, and distribution centers.

WHAT: Rebate-based incentives to offset the cost of eligible charging equipment that directly supports Class 4 to 8 medium heavy duty (MHD) and heavy heavy duty (HHD) goods movement vehicles. The funding amount is determined based on the output of the charging system of the stations.

HOW: All applications must follow the instructions provided in South Coast AQMD’s Grants Management System (GMS). Failure to adhere to the instructions may be cause for rejection of the application without evaluation. The Application Portal can be found on South Coast AQMD’s INVEST CLEAN program page:(<https://www.aqmd.gov/investclean>).

WHEN: Applications can be submitted starting August 15, 2025, at 12 PM PT and closes on November 28, 2025, at 12 PM PT

Application evaluation is anticipated to start in November 2025, followed by Rebate Agreement (“Agreement”) execution starting early 2026.

Charging stations should be commissioned by March 2028, and all awardees will be required to operate the funded equipment for a minimum of five years.

¹ “Project” refers to the proposed charging infrastructure at one location

| Item | Date |
|--------------------------------|----------------------------------|
| Issue PA2026-03 | August 1, 2025 |
| Applications Open | August 15, 2025, at 12 PM PT |
| Deadline to Submit Application | November 28, 2025, at 12 PM PT |
| Agreement Execution | January 2026 through August 2027 |
| Performance and usage tracking | Commencing after Deployment |

ALL APPLICATIONS MUST BE RECEIVED VIA SOUTH COAST AQMD'S ONLINE GRANT MANAGEMENT SYSTEM (GMS)

GENERAL PROGRAM INFORMATION

Funding under this PA is rebate-based. Rebates will be provided on a cost-reimbursement basis in accordance with the fully executed agreement for the charging station(s) (see Section V for the general agreement terms). Charging equipment and associated components that support the charging of Vehicle Classes, as defined in Table 1, and potentially the installation costs of the equipment are eligible for a rebate. Please see the ELIGIBLE EQUIPMENT AND COST Section below for further details.

Table 1- Vehicle Weight Classes & Categories

| Vehicle Class | GVWR Category |
|----------------------|----------------------|
| Class 4 | 14,001-16,000 lbs |
| Class 5 | 16,001-19,500 lbs |
| Class 6 | 19,501-26,000 lbs |
| Class 7 | 26,001-33,000 lbs |
| Class 8 | >33,001 lbs |

The rebate amount is determined by the total charging capacity of the chargers included in the application and the total purchase cost of the eligible equipment (tax and certain fees may be included). Each charging location can receive up to \$700 per kilowatt (kW) installed charging capacity for equipment rebates or the total eligible cost of the project, whichever is lower. To be eligible for the equipment rebate, applicants must have at least one electric vehicle infrastructure training program EVITP²-certified electrician on the installation crew of the funded charging infrastructure, unless the project is required to meet PUC code 740.20 in which additional EVITP certified technicians are required to oversee the project. In addition, in alignment with California Public Contract Code 2601, at least 60 percent of the skilled journeypersons employed to perform installation of the eligible equipment by every contractor

² Assembly Bill 841 (Ting, Chapter 372, Statutes of 2020)

and each of its subcontractors at every tier are graduates of a joint labor-management apprenticeship program for EV infrastructure installation.³

South Coast AQMD staff can connect awardees with a local training program if training is needed on charging, operating, and maintaining charging equipment. Costs of training will not be deducted from the rebate.

PROJECT COST

Applicants must provide cost information that specifies the amount of funding requested and the basis for that request by including vendor quotes in the application. More than one quote is encouraged to determine the best cost estimate. Applicants need to inform vendors of the time frame of the award process so that vendors can estimate prices based on the future/projected order/purchase date – this is important since funding requests and awards may not be revised after the Program closing date. When selecting vendors, applicants must ensure the materials will meet Build American Buy America (BABA) provisions, see SECTION II – FUNDING & CONDITIONS.

Purchase orders or other purchase commitments shall not be placed until after the award has been approved by South Coast AQMD. Placing the equipment purchase order before the agreement is executed is at the risk of the applicants.

Additionally, please provide only the costs directly related to the installation of the equipment. Any costs related to design, engineering, overhead or any other indirect costs are not eligible.

REBATE AMOUNT

Each charging station location is eligible to receive up to \$700 per kW for the procurement cost of eligible equipment, including tax and fees, and potentially associated installation costs. The rebates will be issued on a per-location basis. The rebate amount for an eligible project is determined by the total power rating that the chargers can provide during the operation of all proposed chargers. For example, a project with 10 charging connections each rated at 360kW would have a total charging capacity of 3,600 kW, which can potentially receive a total rebate of up to \$2,520,000 or the total procurement cost of eligible equipment and potentially the cost of installing the eligible equipment, whichever amount is lower.

ELIGIBLE APPLICANT

The applicant must meet the following requirements to be eligible for a rebate:

- Applicant must demonstrate land ownership on which the project will be located, or control it through a long-term lease, easement, or other legal arrangement, for the duration of the project life.
- Applicant must propose the charging station(s) within the boundaries of the two MSAs.

³ Tax credits may be available: <https://www.irs.gov/credits-deductions/prevailing-wage-and-apprenticeship-requirements> & <https://www.irs.gov/credits-deductions/alternative-fuel-vehicle-refueling-property-credit>.

ELIGIBLE EQUIPMENT AND COST

Funding is available for DC Fast Chargers (DCFC) equipment where each connector must support a power output of at least 250 kW. The DCFC-enabling equipment or components that enable the function or are essential to the operation of the DCFC are also eligible as part of the rebate. Potentially, associated installation costs of the eligible equipment can qualify for the rebate. Installation costs must be solely for the eligible equipment. Any indirect installation costs are not eligible.

The site where the DCFCs are installed must support Class 4 - 8 vehicles, which are defined in Table 1 above.

PROGRAM WORKFLOW

Figure 1 below depicts the rebate program implementation process. Table 2 below provides an explanation of each step.

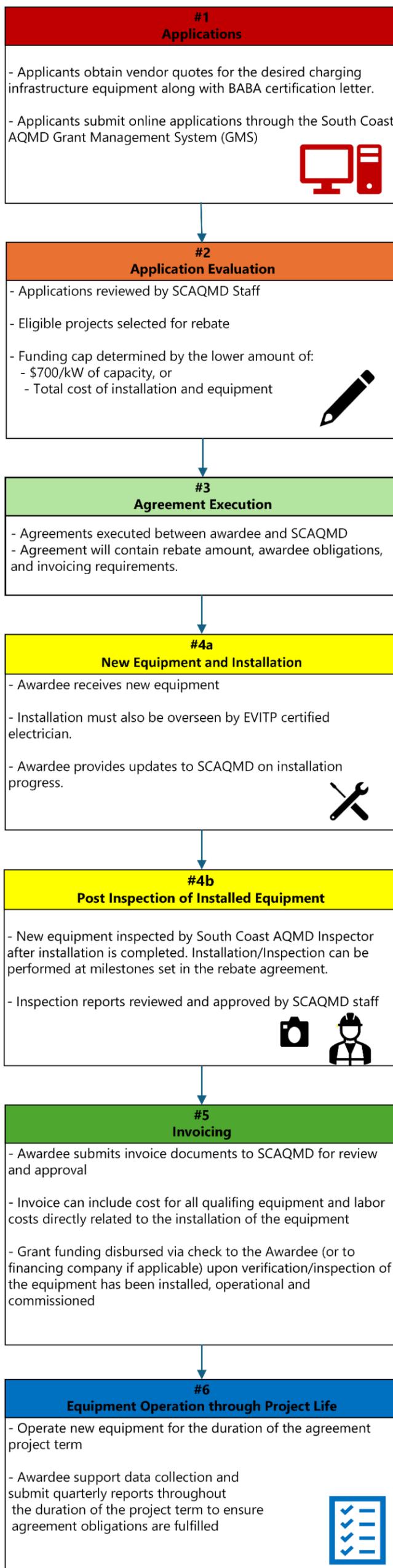


Figure 1: Rebate Program Implementation Process

Table 2: Rebate Program Implementation Process Details

| Workflow Process # | Description of Process |
|--------------------|--|
| 1 | Applicants submit INVEST CLEAN grant applications online through South Coast AQMD's GMS. Applicants must provide all required information and documentation as prompted by the GMS. Applicants will have an opportunity to amend the application during the application review period. |
| 2 | South Coast AQMD staff review the application for completeness, cost reasonableness, and project eligibility. Funding cap will be determined using the \$700/kW formula or the total cost of procurement and installation cost of eligible equipment (whichever one is lower). If additional information, documentation or corrections are required, South Coast AQMD staff will allow the applicant 14 calendar days from a notice of correction to provide a response to the request. Some special circumstances that additional time is needed to obtain the required documentation may be considered if undersubscribed. Eligible applications will be scored and ranked according to the prescribed evaluation criteria. Applications that meet all eligibility requirements will be approved for funding. |
| 3 | Documentation of compliance with all EPA terms and conditions, as identified in Section VI (i.e. BABA, DBRA, etc) will be required prior to agreement execution. The applicant, now Awardee, executes the agreement with South Coast AQMD to establish the milestone schedule and agreement requirements. |
| 4a | New equipment is delivered to the Awardee. The Awardee must inform South Coast AQMD staff upon delivery of project equipment. The crew conducting the construction and installation of the charging station must have at least one EVITP ⁴ -certified electrician on the installation crew of the funded charging infrastructure, unless the project is required to meet PUC code 740.20 in which additional EVITP certified technicians are required to oversee the project. In addition, in alignment with California Public Contract Code 2601, at least 60 percent of the skilled journeypersons employed to perform installation of the eligible equipment by every contractor and each of its subcontractors at every tier are graduates of a joint labor-management apprenticeship program for EV infrastructure installation. |
| 4b | A South Coast AQMD Inspector coordinates with the Awardee to conduct inspection of the charging station once it is in place. Inspections may be performed either on-site or via video or photograph(s) at the inspector's discretion. |
| 5 | Awardee will submit an invoice to South Coast AQMD to request rebate payment. Invoices may be submitted at milestones prescribed in the Agreement. South Coast AQMD will confirm that Awardees have met all program and Agreement requirements prior to the final rebate payment. Only one rebate payment will be made for each site. |
| 6 | Awardee provides access to, designated data collection organization, to track and collect data for the operation of the charging infrastructure. Awardee will meet program requirements and submit semi-annual reports to the South Coast AQMD. |

⁴ Assembly Bill 841 (Ting, Chapter 372, Statutes of 2020)

SECTION II – FUNDING & CONDITIONS

Build America Buy America (BABA)

All funding provided for infrastructure projects under this rebate program is subject to domestic content sourcing requirements under the Build American Buy America (BABA) provisions of the Infrastructure Investment and Jobs Act (IIJA) (P.L. 117-58, §§70911-70917).

1. All iron and steel used in the project are produced in the United States – this means all manufacturing processes, from the initial melting stage through the application of coatings, occurred in the United States;
2. All manufactured products used in the project are produced in the United States – this means the manufactured product was manufactured in the United States; and the cost of the components of the manufactured product that are mined, produced, or manufactured in the United States is greater than 55% of the total cost of all components of the manufactured product, unless another standard that meets or exceeds this standard has been established under applicable law or regulation for determining the minimum amount of domestic content of the manufactured product; and,
3. All construction materials are manufactured in the United States – this means that all manufacturing processes for the construction material occurred in the United States.
4. Link to: [EPA BABA FAQs](#)

Please note that the manufacturer of the products and materials must provide a certification letter of BABA compliance with company letterhead. A template of the letter can be found here: [Certification Letter Template for Manufactured Products Covered Under the Build America, Buy America Act](#). Applicants selected for funding under the INVEST CLEAN Charging Infrastructure Program must provide documentation demonstrating that equipment and materials sourced adhere to the BABA requirements prior to payment. For legal definitions and sourcing requirements refer to <http://www.aqmd.gov/investclean/baba>.

Inspections

Inspections will be performed on the funded charging stations per the Agreement terms. Equipment inspections may be conducted in person or via remote inspections. Recipients must make all funded equipment available for in-person or remote inspections, unless otherwise specified in the Agreement or through updates from South Coast AQMD.

Payments

Payments will be made upon the completion of the installation and the verification of the charger capacity and BABA certification(s). Only one payment will be made per site location. The rebate amount cannot exceed the total purchase and installation cost of the equipment at each project location (tax and fee may be included). Each project location can receive a maximum rebate amount of \$700 per kW for the reimbursement of equipment and potentially, associated installation costs.

To receive a rebate payment, the awardee must submit for each project location:

- An itemized invoice and proof of expenditure for the procurement and installation of eligible equipment
 - Copy of vendor's invoice with detailed breakdown of costs
- The payment may be based on the completion of all equipment installation, as outlined in the payment schedule in the agreement.
- For verification of the project site's total charging capacity, the applicant must provide an "Adequate Facility Letter" or equivalent from the licensed electrician or utility company. Projects where all proposed chargers can operate at the rated capacity will be prioritized.
- Documentation of compliance with all EPA terms and conditions, as identified in Section VI (i.e. BABA, DBRA, etc) which will also be required prior to agreement execution.

Data Collection

The charging equipment deployed under this Program will be required to report operational data metrics, such as energy usage, number of charge sessions, charge success rates, truck types, and other relevant data. For the duration of the 5-year project life, recipients shall allow remote access by the South Coast AQMD partner, the designated third-party data verification organization under INVEST CLEAN. This organization will collect and analyze operational data for this Program. Recipients may request to withhold business-sensitive data, provided this does not compromise the data collection objectives. Note that such requests will not abrogate or modify the provisions of Government Code Section 7920 et seq. (Public Records Act). Specific data collection and reporting procedures will be provided to the recipient.

SECTION III – APPLICATION SUBMITTAL REQUIREMENTS

The electronic application in the GMS will prompt applicants for all required application information. **Attachment A** provides a listing of required application information. It is the responsibility of the Applicant to ensure that all information submitted to South Coast AQMD's GMS is accurate and complete. An application can include multiple locations, and a single rebate will be issued per location. Applicants must sign the online application to indicate their understanding of the Program requirements stated in this Program Announcement.

All online applications must be submitted according to specifications set forth herein. Failure to adhere to these specifications may be cause for rejection of the application without evaluation.

Grounds for Rejection:

An application may be immediately rejected if the application:

- Does not submit all required information and documentation as required via GMS.
- It is not signed by an individual authorized to represent the firm.

Certifications and Representations

South Coast AQMD "Business Information Forms" requiring signatures will be available on the GMS and are required to be submitted with the application.

Methods of Delivery:

The applicant must submit the application using the South Coast AQMD’s GMS, available at <https://www.aqmd.gov/investclean>. The GMS will allow applicants to create the application and make modifications to the application until the electronic submission to the South Coast AQMD prior to the submission due date and time specified above. Additional information may be requested during the evaluation.

Disposition of Applications

The South Coast AQMD reserves the right to reject any or all applications. All responses become the property of the South Coast AQMD. The electronic copy of the application shall be retained for South Coast AQMD files. Please review the Access to Records and Retention disclaimer in SECTION VI – LEGAL UPDATES AND DEFINITIONS.

Modification or Withdrawal

Ensure that the information input and documentation uploaded are accurate and complete. Once submitted, applications cannot be altered. Applicants may submit more than one application per solicitation. Applications can be withdrawn through the GMS system.

Confidentiality

Please ensure that any trade secret, confidential or proprietary information being provided is marked accordingly. Please see the following website for more details:

<https://www.aqmd.gov/docs/default-source/default-document-library/Guidelines/praguidelines.pdf>

SECTION IV: APPLICATION EVALUATION/AWARDEE SELECTION CRITERIA

South Coast AQMD staff will evaluate all submitted applications/charging location(s) and award each charging location through an executed rebate agreement. Each charging location will be evaluated based on the scoring criteria provided below:

| EVALUATION CRITERIA | POINTS |
|--|------------|
| Project Readiness based on the following: <ul style="list-style-type: none"> • Documentation showing the sufficient power capacity at the site to support the proposed chargers (Load sharing will receive less points and a letter from the utility company confirming site capacity will receive full points) • Site ownership/lease agreement is in place | 20 |
| Demonstrating compliance with Section VI: Legal Updates and Definitions below | 20 |
| Location (closes a gap in charging network for goods movement industry) <ul style="list-style-type: none"> • Applicant should provide justification of how the locations were selected or the tools used for the selection of the charging locations. | 20 |
| Utilization of charging site, including obtaining commitment letters from the fleets and ability to demonstrate the minimum throughput proposed | 10 (+5) |

| | |
|---|------------|
| <ul style="list-style-type: none"> Additional points for projects supporting INVEST CLEAN Measure 2 Truck Deployment (excluding publicly accessible charging projects) (https://www.aqmd.gov/investclean) | |
| Public Access (Limited Public Access with a minimum of two usage fleet contracts will receive less points) | 15 |
| Reasonableness of Cost vs Competition and Industry Average | 10 |
| TOTAL: | 100 |

Charging locations will be ranked from highest to lowest scores based on the above evaluation criteria and then selected for funding in proportion to each county's Class 4 to 8 MD/HD truck population. Funds may be redistributed based on applications received to target areas of high truck charging demand. This is to ensure that funding is balanced across the two MSAs.

In addition to the geographic minimum, there is a possibility that due to program priorities, Applicants may be offered only partial funding. If the Rebate Program is oversubscribed, not all applications that meet the evaluation criteria may be funded.

SECTION V –AGREEMENT

All applicants who are selected for funding awards must enter into a written Agreement with the South Coast AQMD and will be considered recipients of the rebate award, or Awardees.

Note: The South Coast AQMD has no obligation to fund the project until both parties have fully executed the agreement.

The scope of work will include tasks and deliverables that demonstrate compliance with the requirements of the EPA-funded INVEST CLEAN Program administered by South Coast AQMD.

Agreements will include, at a minimum, the following requirements:

- The charging equipment must be in service for a minimum of five (5) years from the date of commissioning.
- Equipment and components enabling DCFC may be funded under this opportunity and is to be performed by a crew that has at least one electric vehicle infrastructure training program EVITP⁵-certified electrician on the installation crew of the funded charging infrastructure, unless the project is required to meet PUC code 740.20 in which additional EVITP certified technicians are required to oversee the project. In addition, in alignment with California Public Contract Code 2601, at least 60 percent of the skilled journeypersons employed to perform installation of the eligible equipment by every contractor and each of its subcontractors at every tier are graduates of a joint labor-management apprenticeship program for EV infrastructure installation.
- Operational data, as defined in the data collection section, will be required. (i.e., maintenance and repair records).

⁵ Assembly Bill 841 (Ting, Chapter 372, Statutes of 2020)

- Assurance that the project complies with other local, state, and federal programs, and resulting emission reductions from a specific project are not required as a mitigation measure to reduce adverse environmental impacts that are identified in an environmental document prepared in accordance with the California Environmental Quality Act or applicable Federal regulations.
- If requested, an awardee must provide a financial statement and bank reference, or other evidence of financial ability to fulfill Agreement requirements.
- Be available for a follow-up inspection by South Coast AQMD, if requested.
- Maintain property insurance as required by law.
- Ensure operation of the charging infrastructure within one of two MSAs and provide all necessary semi-annual reports.
- The charging infrastructure is expected to meet the minimum kWh a year throughput as proposed by the applicant in the application. The proposed annual throughput will be subject to review by South Coast AQMD staff.
- Ensure infrastructure is operated for a minimum of five (5) years, and furnish at least one year's manufacturer's warranty, and keep proper maintenance of equipment.

DELIVERABLES

The Agreement will describe how the project will be monitored and what type of information will be included in semi-annual and annual project progress reports for the duration of the 5-year operation requirement. At a minimum, the South Coast AQMD expects to receive the following:

- Semi-annual and Annual reports consisting of:
 - Number of charging stations and hoses per charger
 - Annual throughput/energy usage during the reporting period
 - Problems/issues of any unscheduled downtime that occurred during the reporting period and the cause of the downtime
- Proof of property insurance
- Records of the energy meter to support the reported semi-annual usage

South Coast AQMD reserves the right to verify all information provided. Please review the Access to Records and Retention disclaimer in SECTION VI – LEGAL UPDATES AND DEFINITIONS.

PERFORMANCE

When an Awardee is unable to meet the program requirements (e.g., semi-annual, annual reporting, operation, emission benefits, etc.) or terms specified in the agreement, South Coast AQMD may consider the options to remedy the violation before seeking enforcement action.

Options for non-performance include, but are not limited to, the following:

- Extending the agreement to make up the usage requirement shortfall
- The owner will make its best effort to repair the equipment and assist with identifying a new operator.
- South Coast AQMD and EPA will review and approve the justification for the deployment failure before any ownership transfer can be authorized.

SECTION VI: LEGAL UPDATES AND DEFINITIONS

CONFIDENTIALITY

Please ensure that any trade secret, confidential or proprietary information being provided is marked accordingly. Please see the following website for more details:

<https://www.aqmd.gov/docs/default-source/default-document-library/Guidelines/praguidelines.pdf>

ACCESS TO RECORDS AND RETENTION

Materials, reports, photos, and other documentation submitted pursuant to the project may be released in part or in whole pursuant to either the Freedom of Information Act or the California Public Records Act. The EPA or South Coast AQMD may make publicly available on their websites, copies or portions of project information.

EPA and South Coast AQMD also reserve the right to access records of the applicant/recipient pertinent to this award, to perform audits, execute site visits, or for any other official use. This right of access also includes timely and reasonable access to the applicant/recipient's personnel for the purpose of interviewing and discussion related to such documents or the Federal award in general. This right of access shall continue as long as the records are retained.

In accordance with 2 CFR 200.334, the recipient must retain all Federal award records, including but not limited to, financial records, supporting documents, and statistical records for at least three years from the date of submission of the final financial report. The records must be retained until all litigation, claims, or audit findings have been resolved and final action has been taken if any litigation, claim, or audit is started before the expiration of the three-year period. Examples of the required records include: (1) time and attendance records and supporting documentation; and (2) documentation of compliance with statutes and regulations that apply to the project.

In accordance with 2 CFR 200.337, the EPA, the Inspector General, the Comptroller General, and the pass-through entity, or any of their authorized representatives, have the right of access to any documents, papers or records of the recipient which are pertinent to the grant award. The rights of access are not limited to the required retention period, but last as long as the records are retained.

USE OF LOGOS

Use of the EPA's logo, along with logos of other participating entities, on outreach materials, websites, or reports, must adhere to the requirements of both the General Terms and Conditions, Paragraph Q, and California Health and Safety Code Section 40730.

STATEMENT OF COMPLIANCE

Government Code Section 12990 and California Administrative Code, Title II, Division 4, Chapter 5, require employers to agree not to unlawfully discriminate against any employee or Applicant because of race, religion, color, national origin, ancestry, physical handicap, medical condition, marital status, sex, or age. A statement of compliance with this clause is included in all South Coast AQMD contracts.

COMPLIANCE WITH APPLICABLE LAWS

Applicants must comply with all federal, state, and local laws, ordinances, codes and regulations. Applicants must describe construction activities (i.e. ground disturbance, noise, removal of vegetation, modification of water features, and light disturbances) that will be required for project completion. These activities will be evaluated. If the application is selected for a funding award, all equipment to be purchased must be compliant with all applicable federal, state, and local air quality rules and regulations, and will maintain compliance for the full Agreement term. Applicants must be aware of the following legal requirements:

- Davis-Bacon and Related Acts (DBRA) is a collection of labor standards provisions administered by the Department of Labor that are applicable to grants involving construction. Under DBRA, all contractors and subcontractors performing construction must be paid no less than the locally prevailing wage and fringe benefits for corresponding work on similar projects in the area. Weekly certified payrolls must be submitted to South Coast AQMD and maintained for no less than three years after work completion. By executing an Agreement under INVEST CLEAN, the selected applicant acknowledges and agrees to the terms provided in the DBRA Requirements for Contractors and Subcontractors Under EPA Grants: https://www.epa.gov/system/files/documents/2023-10/dbra_requirements_for_contractors_and_subcontractors_under_epa_grants.pdf
- Endangered Species Act (16 U.S.C. §1531 et seq.): The Endangered Species Act requires a biological assessment to determine if any endangered or threatened species, or their critical habitat, could be adversely affected by the proposed construction activities. The assessment must be completed within 180 days after the date it was initiated and must be completed prior to any contract for construction and before any construction has begun. The assessment process is outlined as follows:
 - A desktop review to identify species and habitats in the vicinity of the construction site using the U.S. Fish and Wildlife Service’s (USFWS) IPaC tool: <https://ipac.ecosphere.fws.gov/>
 - If species or habitats are potentially impacted, a consultation with the USFWS may be required
 - Avoidance and Mitigation measures such as protective buffers, erosion control, and other Best Management Practices (BMP) may be proposed.
 - The USFWS must agree with the assessment and resolution before the project can commence.
 - Information on the Endangered Species Act: <https://www.epa.gov/laws-regulations/summary-endangered-species-act>
 - Procedures explained in 50 CFR Part 402: [50 CFR Part 402 -- Interagency Cooperation—Endangered Species Act of 1973, as Amended](#)
- National Historic Preservation Act (16 U.S.C. §470 et seq.): This Act requires a review of potential adverse effects of federally funded activities on historic properties listed or eligible for listing on the National Register. This review should be completed prior to applying for permits.
 - For more details see: <https://www.nps.gov/subjects/archeology/national-historic-preservation-act.htm>

- Selected applicants under this Program Announcement are to provide South Coast AQMD with documentation demonstrating compliance with the National Historic Preservation Act (16 U.S.C. §470 et seq.) A mapping tool such as the link below from the U.S. Department of the Interior can be utilized to determine whether the construction site impacts a registered national historical property:
https://www.nps.gov/orgs/1094/nrhp_spatialdata.htm
- The applicant must work with the EPA on any required consultation process with the State or Tribal Historic Preservation Office prior to commencing the project to ensure compliance with section 106 of the NHPA.
- For possible exemptions, please see: Section “IV. Test Exemption” on the bottom on page 662303: <https://www.achp.gov/sites/default/files/exemptions/2022-11/Exemption%20for%20Electric%20Vehicle%20Supply%20Equipment%2010.26.22.pdf>
- Archeological and Historic Preservation Act (54 U.S.C. §§ 312501-312508): Similar to the National Historic Preservation Act, this Act applies to federally funded activities. It requires historic and archeological objects and materials to be saved that would otherwise be destroyed as a result of the activity.
 - For more details see: <https://uscode.house.gov/view.xhtml?req=granuleid%3AUSC-prelim-title54-chapter3125&edition=prelim>
 - Selected applicants under this Program Announcement are to report to South Coast AQMD and the EPA any historical or archeological objects and materials found in the process of construction.
- Farmland Protection Policy Act (7 U.S.C. §4201 et. seq.): The purpose of this Act is to minimize or prevent the irreversible conversion of farmland to nonagricultural uses. This act would require identification of the effects federally funded activities may have on farmlands and to consider alternative options.
 - For more details see: <https://www.nrcs.usda.gov/conservation-basics/natural-resource-concerns/land/cropland/farmland-protection-policy-act>
 - Applicants selected under this Program Announcement must demonstrate adherence to the Farmland Preservation Policy Act (7 U.S.C. §4201 et. Seq.)
 - <https://www.nrcs.usda.gov/conservation-basics/natural-resource-concerns/land/evaluation-and-assessment>
- Coastal Zone Management Act (16 U.S.C. § 1451 et. seq.): This act requires the review of federally funded activities to determine if the goal of the Act is being met: “preserve, protect, develop and where possible, to restore or enhance the resources of the nation’s coastal zone.”
 - For more details see: <https://coast.noaa.gov/czm/act/>
 - Applicants selected under this Program Announcement may need to consult with the California Coastal Commission to ensure that the applicant’s project will be consistent with the state’s coastal zone management plan.
 - Map of California Coastal Zone: <https://www.coastal.ca.gov/maps/>
 - Information about obtaining a permit: https://www.coastal.ca.gov/enforcement/cdp_pamphlet.pdf

- Reporting Waste, Fraud and Abuse (2 CFR 200.113): Consistent with Federal requirements, applicants must promptly report in writing whenever there is credible evidence of the commission of a violation of federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations per the requirements outlined in EPA's General Terms and Conditions, Paragraph 51, which can be found at: https://www.epa.gov/system/files/documents/2024-10/fy_2025_epa_general_terms_and_conditions_effective_october_1_2024_or_later.pdf

CONFLICT OF INTEREST

Applicant must address any potential conflicts of interest with other clients affected by actions performed by the firm on behalf of South Coast AQMD. Although the applicant will not be automatically disqualified by reason of work performed for such firms, the South Coast AQMD reserves the right to consider the nature and extent of such work in evaluating the application. Conflicts of interest will be screened on a case-by-case basis by the South Coast AQMD General Counsel's Office. Conflict of interest provisions of the state law, including the Political Reform Act, may apply to work performed pursuant to this contract.

COMPLIANCE WITH LABOR LAWS AND OTHER FEDERAL STATUTES

If an application is deemed eligible, the Applicant will be required to disclose any labor violations that have occurred within the last three years to be further considered for an award. If awarded, the recipient will be required to notify South Coast AQMD in writing if they have been found by a court or federal or state agency to have violated labor laws. The recipient will complete a yearly certification in which they will either state that they have not been found by a court or federal or state agency to have violated labor laws or, if such violations have been found, the recipient will give South Coast AQMD details about those violations in the certification. If the recipient has previously provided that information to the South Coast AQMD, they will be required to reattach that previous notification to the certification and provide any additional details about those violations that have not previously been provided. The recipient's yearly certification will be due at the same time as the annual progress reports. South Coast AQMD reserves the right to terminate the Agreement with a recipient that has been found to have violated labor laws or federal statutes, and the recipient may be required to return any and all funds, as determined by South Coast AQMD. The recipient will also ensure that these requirements are included in all downstream partnerships.

ECONOMIC SANCTIONS (RUSSIA/UKRAINE)

On March 4, 2022, Governor Gavin Newsom issued Executive Order N-6-22 (EO) regarding sanctions in response to Russian aggression in Ukraine. Applicants who are considered eligible for funds under this PA and receive executed contracts from South Coast AQMD, are obligated to comply with existing economic sanctions imposed by the U.S. government in response to Russia's actions in Ukraine.

DEFINITIONS

1. Agreement Term

The agreement term is the duration of the project life as defined in the equipment. It encompasses both the project completion and project implementation periods:

- i. Project completion period is the first part of the Agreement term starting from the date of Agreement execution by both parties to the date the project post-inspection confirms that the project has become operational.
 - ii. Project implementation period is the second part of the Agreement term and equals the project life.
2. Project Life
Project life is the period of the Agreement term during which the project equipment must be operated and provide operational data. The recipient must submit the deliverables stipulated in the Agreement throughout the project life. INVEST CLEAN agreements for Charging Infrastructure under this PA will include a 5-year operational period beyond the commissioning date.
3. South Coast AQMD Jurisdiction
The South Coast AQMD is the air pollution control agency for all of Orange County and the urban portions of Los Angeles, Riverside and San Bernardino counties. Within Riverside County, the South Coast AQMD also has jurisdiction over the Salton Sea Air Basin and a portion of the Mojave Desert Air Basin. This area of 10,743 square miles is home to approximately 17 million people—about half the population of the state of California. It is the second most populated urban area in the United States and one of the smoggiest. Visit <http://www.aqmd.gov/nav/about/jurisdiction> for more information.
4. Indirect Costs
“Means those costs incurred for a common or joint purpose benefitting more than one cost objective and not readily assignable to the cost objectives specifically benefited, without effort disproportionate to the results achieved. It may be necessary to establish multiple pools of indirect costs to facilitate equitable distribution of indirect expenses to the cost objectives served. Indirect cost pools must be distributed to benefit cost objectives on the basis that will produce an equitable result in consideration of the relative benefits derived. For Institutions of Higher Education (IHE), the term facilities and administrative (F&A) cost is often used to refer to indirect costs.” (2 CFR 200.1 “Indirect cost”, [https://www.ecfr.gov/current/title-2/part-200/section-200.1#p-200.1\(Indirect%20cost\)](https://www.ecfr.gov/current/title-2/part-200/section-200.1#p-200.1(Indirect%20cost)))

WORKSHOP FOR ADDITIONAL INFORMATION/ASSISTANCE:

Additional information regarding the content or intent of this PA, procedural matters, sample contract, and the compliance plan worksheet can be found at the South Coast INVEST CLEAN website at: <https://www.aqmd.gov/investclean>

Additionally, information on virtual pre-recorded presentations and other meetings (as needed) are to be posted on the INVEST CLEAN website.

South Coast AQMD staff members are available to answer questions during the application period. To expedite assistance, please direct your inquiries to investclean-infrastructure@aqmd.gov.

ATTACHMENT A – PROJECT INFORMATION FORM

Please be prepared to provide the following information as prompted by the INVEST CLEAN GMS.

APPLICANT INFORMATION

| | | | |
|---|-----------------------|-------|---------------|
| Applicant Name | | | |
| Business Address | | | |
| City, State and Zip | | | |
| Phone | () - Ext | Fax | () - |
| Contact Name | | Title | |
| E-mail Address | | | |
| Project Site Location (Full address) | | | |

PROJECT DESCRIPTION

| | |
|---|--|
| <p>Project Description which summarizes the project location, fleet commitments, station charger count and charging rate, and a projection of charger utilization (monthly, annually).</p> <p>Provide a description of construction activities (i.e. ground disturbance, noise, removal of vegetation, modification of water features, and light disturbances).</p> <p>Describe any federal, state, or local environmental review already completed at the time of application for the site location.</p> | |
| <p>Number of connectors per Charger and charger rating (minimum of 250 kW for single plug and 500 kW for dual plug)</p> <p>Total power output of the proposed charging station in kW</p> | |
| <p>Detailed specification of charging equipment and enabling equipment</p> | |

| | |
|---|--|
| Provide justification for each enabling equipment | |
| Itemized associated installation costs of the charging equipment and enabling equipment | |
| Site operation model? (no subscription required (fully public access), contract/subscription required, semi-private, fully private, or other formats) | |

PROJECT COST AND FUNDING REQUEST

| | |
|--|--|
| Total cost of the charging station project | |
| Funding request, as supported by vendor quote(s) for equipment procurement and installation. | |

PROJECT IMPLEMENTATION SCHEDULE

| Project tasks: | Proposed Dates |
|--|-----------------------|
| Site power upgrade, if needed. | |
| Engineering Design, if required. | |
| | |
| Place order for project equipment | |
| Delivery of charging equipment | |
| Construction and installation of the charging station (specify the timeline if chargers are installed in phases) | |
| Commissioning of the charging station and local government final approval (City permit signed off with construction, electrical, fire safety inspection done by municipality). | |

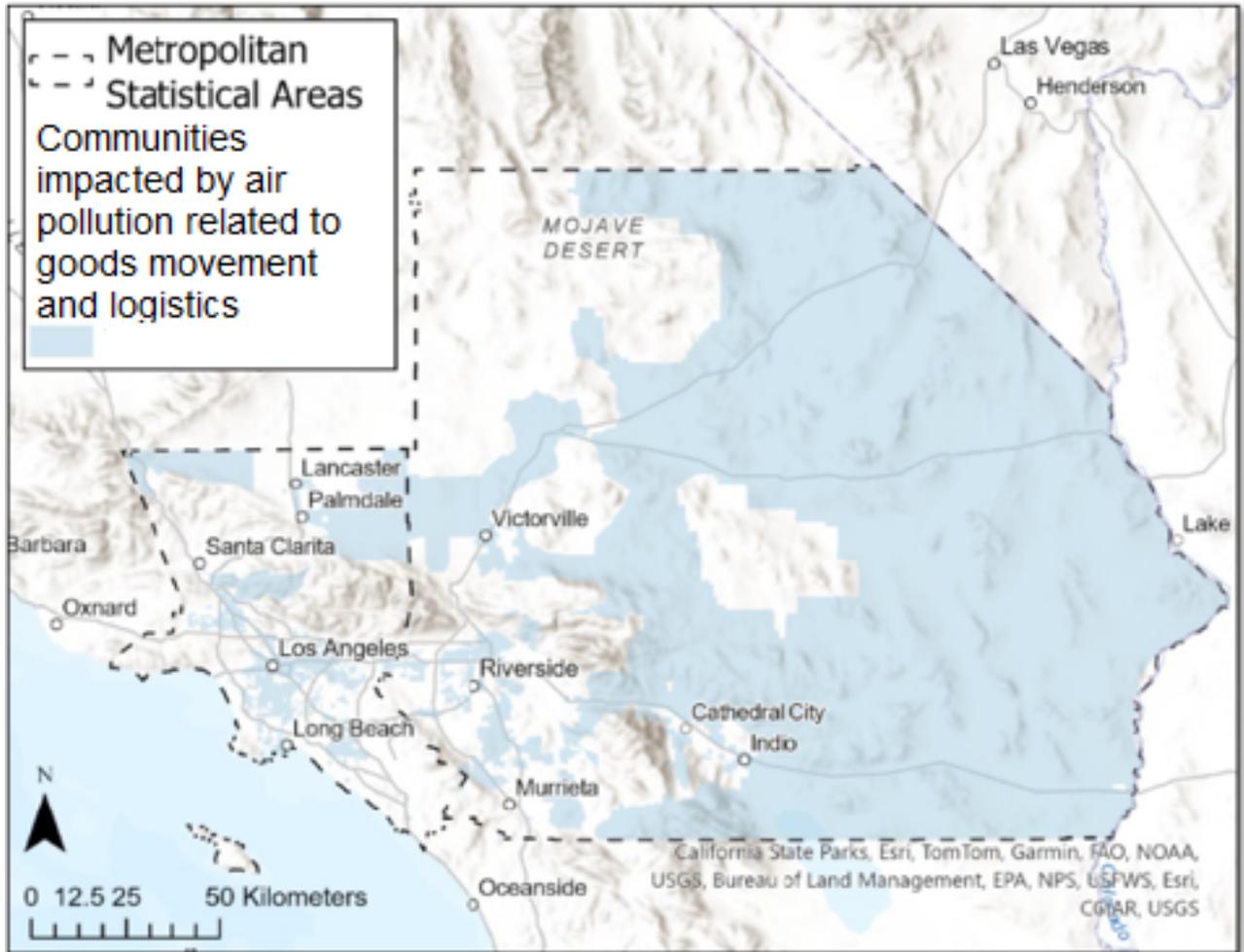
REQUIRED ATTACHMENTS:

- All vendor quotes and related information to support the basis of the project cost estimate.

- Site Layout that includes ingress, egress and location of all charger(s) and plug(s).
- Applicant must provide a description of the geographic location, including an aerial map (i.e., satellite view from an internet-based map or city/county map) and specific street address or GPS coordinates of the proposed charging station location.
- Applicants must document that they either own the land on which the project will be located, or control it through a long-term lease, easement, or other legal arrangement, for the duration of the project life. For a proposed project where the land is not owned by the applicant, an executed lease agreement or letters of commitment lasting for the duration of the project life must be signed by property owners/authorized representatives and must be submitted with the application.
- Site electricity power evaluation that establishes the project readiness of the power capacity at the site for the proposed chargers.
- A truck deployment plan or truck charging service plan that documents planned fleet usage or participation/ commitments/agreements. This also support project readiness.
- Applicants must provide documentation that power is being or will be provided to the site in a timely manner to meet project milestones and deadlines.
- Other documentation that demonstrates project readiness, including documentation from the utility regarding power capacity and upgrade schedule (if applicable).
- If the proposed charging station provide charging for vehicles funded by INVEST CLEAN Measure 2, provide documentation.

ATTACHMENT B - Map of INVEST CLEAN MSAs

Map includes the following counties: Los Angeles, Orange, Riverside, and San Bernardino



BOARD MEETING DATE: August 1, 2025

AGENDA NO. 4

PROPOSAL: Issue Program Announcement, Transfer Funds, and Execute Agreements for CHDV ELECTRIC Program and Amend Awards for Carl Moyer Program

SYNOPSIS: In January 2025, South Coast AQMD recognized an award of \$33,898,522, including administrative costs, from the U.S. EPA 2024 Clean Heavy-Duty Vehicles (CHDV) Grant Program. The awarded proposal titled “Empowering Local Environmental Change Through Replacing Internal Combustion with Battery Electric Class 6 or 7 Vehicles” (ELECTRIC) is designed to replace diesel or gasoline-powered Class 6 and 7 freight delivery vehicles with zero-emission vehicles. These actions are to: (1) issue a Program Announcement to solicit projects for ELECTRIC, (2) execute agreements with eligible applicants, (3) appropriate \$75,000 from the General Fund Undesignated (Unassigned) Fund Balance into Information Management’s FY 2025-26 Budget, Services and Supplies and/or Capital Outlays Major Objects for modifying the existing online application system to accept ELECTRIC applications, and (4) authorize the Executive Officer to amend awards and execute contract with Two Brothers Fishery LLC for up to \$200,000 under the Carl Moyer Program Fund (32) and with EV Mill Tenant LLC under the Community Air Protection AB 134 Fund (77).

COMMITTEE: Technology, June 20, 2025; Recommended for Approval

RECOMMENDED ACTIONS:

1. Issue Program Announcement (PA) #PA2026-04 under the U.S. EPA 2024 Clean Heavy-Duty Vehicles (CHDV) Empowering Local Environmental Change Through Replacing Internal Combustion with Battery Electric Class 6 or 7 Vehicles (ELECTRIC) program to incentivize the replacement of Class 6 and 7 diesel or gasoline powered freight delivery vehicles with new battery electric vehicles;
2. Based on the results of the PA, authorize the Executive Officer to execute agreements for the eligible projects for up to \$29,299,650 from the Advanced Technology, Outreach and Education Fund (17);

3. Appropriate \$75,000 from the General Fund Undesignated (Unassigned) Fund Balance into Information Management’s FY 2025-26 Budget, Services and Supplies and/or Capital Outlays Major Objects for modifying the existing online application system to accept Empowering Local Environmental Change Through Replacing Internal Combustion with Battery Electric Class 6 or 7 Vehicles (ELECTRIC) applications; and
4. Amend two awards, approved in February 2024 and December 2024, due to ownership changes and authorize the Executive Officer to execute contracts with Two Brothers Fishery LLC for up to \$200,000 from the Carl Moyer Program Fund (32) and with EV Mill Tenant LLC for up to \$5,885,910 from the Community Air Protection AB134 Fund (77).

Wayne Natri
Executive Officer

AK:MW:TL

Background

In July 2024, South Coast AQMD submitted a proposal titled ELECTRIC to the U.S. EPA’s Clean Heavy-Duty Vehicles (CHDV) grant opportunity. In December 2024, the proposal was awarded for \$33,898,522 and the award was recognized by the Governing Board on January 10, 2025. ELECTRIC is designed to incentivize the replacement of older Class 6 and 7 internal combustion freight delivery vehicles with battery electric technology. Funding for charging equipment is also supported by ELECTRIC but it is subject to a cap for each vehicle type. ELECTRIC also invests in developing workforce training programs with local entities and organizations, which include, but are not limited to, community colleges, equipment dealerships, and manufacturers, for the operation, maintenance, and servicing of zero-emission vehicles. Additionally, the program includes a framework for community engagement for education and outreach on air pollution zero-emission technologies.

In February 2024, the Board approved a list of awards under the “Year 25” Carl Moyer Program. Staff has identified an amendment necessary to proceed with one award previously approved to SoCal Fish Co, LLC. The applicant underwent a partial change of ownership and needed an update to their business name from SoCal Fish Co, LLC to Two Brothers Fishery, LLC. The award amount remains unchanged at \$200,000.

In December 2024, the Board approved awards from the Carl Moyer Zero Emission Infrastructure Program. One of the grantees, EV Realty, Inc., transferred the awarded charging station project to a wholly owned subsidiary named EV Mill Tenant LLC. The project’s awarded amount of \$5,889,110 remains the same.

Proposal

This action is to issue #PA2026-04 for replacing diesel or gasoline Class 6 and 7 freight vehicles with new battery electric vehicles. Funding for supporting charging infrastructure is also available upon request. The PA will open on August 15, 2025, and will close on September 30, 2025. Staff also recommends to authorize the Executive Officer to execute agreements using the Advanced Technology, Outreach and Education Fund (17) for eligible projects under #PA2026-04, until funds are exhausted.

In addition, South Coast AQMD will modify the existing Carl Moyer online project application system to accept and track ELECTRIC project applications.

Lastly, staff recommends amending two awards by changing the recipients' names approved under the "Year 25" Carl Moyer Program from SoCal Fish Co, LLC to Two Brothers Fishery LLC, and approved under the 2024 Carl Moyer Zero Emission Infrastructure Program from EV Realty, Inc. to EV Mill Tenant LLC.

Outreach

In accordance with South Coast AQMD's Procurement Policy and Procedure, a public notice advertising the PA and inviting bids will be published in the Los Angeles Times, the Orange County Register, the San Bernardino Sun, and Riverside County's Press Enterprise newspapers to leverage the most cost-effective method of outreach to the South Coast Basin.

Additionally, potential bidders may be notified utilizing South Coast AQMD's own electronic listing of notice of the PA will be placed on South Coast AQMD's website (<http://www.aqmd.gov>) where it can be viewed by making the selection "Grants & Bids."

Benefits to South Coast AQMD

The South Coast Air Basin is classified as in extreme nonattainment for ozone and serious nonattainment for PM2.5 with the NAAQS. Projects funded by ELECTRIC will support and accelerate the replacement of older, polluting internal combustion engine Class 6 and 7 vehicles with zero-emission technologies, reducing ozone, PM2.5, and other air pollution. The program is projected to annually reduce 29,434 pounds of NOx and 558 pounds of PM2.5. Furthermore, the program is expected to annually decrease carbon dioxide equivalent (MT CO2e) emissions by 599,200 metric tons. ELECTRIC will implement a workforce training program that not only supports the transition to zero-emission technologies but also creates jobs throughout the region. ELECTRIC will work with a third-party facilitator and a steering committee to amplify awareness, workforce training, and job creation benefits for South Coast AQMD residents through outreach and educational efforts.

Resource Impacts

Funding for the ELECTRIC program will be sourced from the US EPA award of \$33,898,522 in the Advanced Technology, Outreach and Education Fund (17), which includes administrative costs needed to implement this program. Sufficient funds are available in the General Fund Undesignated (Unassigned) Fund Balance for the ELECTRIC online application portal.

Attachment

PA #2026-04: Clean Heavy Duty Vehicle Incentive Program Battery Electric Freight Vehicles for Classes 6 and 7(ELECTRIC)



Empowering Local Environmental Change

Through Replacing Internal Combustion with Battery Electric Class 6/7 Vehicles (ELECTRIC)



Program Announcement

PA2026-04

Clean Heavy Duty Vehicle Incentive Program
Battery Electric Freight Vehicles for Classes 6 and 7

Accepting Applications : August 15, 2025 at 12 PM PT
Submission Deadline: September 30, 2025 at 12 PM PT

INTRODUCTION

The United States [Environmental Protection Agency's \(US EPA\)](#) established a funding initiative (Program) to replace older, non-zero-emission Class 6 and 7 heavy-duty vehicles with zero-emission alternatives. The Program aims to reduce air pollution and greenhouse gas emissions, particularly in communities in nonattainment areas.

In November 2024, South Coast AQMD was awarded \$29 million grant under the Program for the proposal titled "Empowering Local Environmental Change Through Replacing Internal Combustion with Battery Electric Class 6 or 7 Vehicles" (ELECTRIC), designed to replace diesel or gasoline-powered Class 6 and 7 freight and food product delivery vehicles with zero-emission technology. Many of these vehicles operate near residential neighborhoods and presenting significant health and environmental risks.

The purpose of this Program Announcement (PA) is to solicit project applications for ELECTRIC, which will provide rebates for the replacement of goods movement Class 6 and 7 internal combustion freight delivery vehicles with battery-electric alternatives. Supporting charging units for battery electric vehicles can also receive funding from ELECTRIC.

If training is needed in battery electric technology related to vehicles funded through the Program, the training will be provided by the Program through the manufacturers, a local university, or a training institution.

SECTION I - OVERVIEW

The total funding amount under this PA is approximately \$29 million from ELECTRIC funds awarded to the South Coast AQMD. All applications will be evaluated based on the criteria set forth in this PA, which align with the ELECTRIC Workplan approved by the US EPA and Terms and Conditions for ELECTRIC.

WHO: Applicants may be public or private entities that currently own and operate a Class 6 or 7 vehicle for goods movement.

WHAT: Incentive replacements under this PA are rebate-based and limited to the replacement of battery electric Class 6 and 7 freight vehicles, including transport refrigeration unit (TRU) vehicles. Only Class 6 and 7 (GVWR 19,501 to 33,000 pounds) goods movement vehicles are eligible for the rebate. For additional information, please visit South Coast AQMD's program page: [ELECTRIC](#) (<http://www.aqmd.gov/electric>)

HOW: Applications must be submitted online through South Coast AQMD's Grant Management System (GMS) link: <http://gms.aqmd.gov>

WHEN: Application period will open on August 15, 2025 at 12 PM PT and will close on September 30, 2025 at 12 PM PT.

| Item | Date |
|--------------------------------|------------------------------------|
| Issue PA2026-04 | August 1, 2025 |
| Applications Open | August 15, 2025, at 12 PM PT |
| Deadline to Submit Application | September 30, 2025, at 12 PM PT |
| Agreement Execution | October 2025 through December 2025 |
| Performance and usage tracking | Commencing after Deployment |

**ALL APPLICATIONS MUST BE RECEIVED VIA SOUTH COAST AQMD'S
ONLINE GRANT MANAGEMENT SYSTEM**

GENERAL PROGRAM INFORMATION

Incentive funding under this PA is rebate-based. Only Class 6 and 7 goods movement trucks are eligible for the rebate. One new charging unit per vehicle is also eligible for a rebate.

Eligible Participant

- The applicant must be currently compliant with applicable fleet/truck regulations.
- The applicant must be the current registered owner of the vehicle(s) being retired.
- If awarded, the applicant must enter into a written agreement with South Coast AQMD as a condition of receiving funds and agree to operate the replacement vehicles for a minimum of 5 years. See SECTION IV – PROJECT AGREEMENT

Eligible Retiring Vehicle

- The retiring vehicle must be powered by diesel or gasoline.
- The retiring vehicle must have an engine model year of 2010 or newer and be compliant and registered in the California Air Resources Board's TRUCRS database.
- The retiring vehicle must be domiciled and have operated at least 75% within the South Coast AQMD jurisdiction, which includes Orange County, and urban portions of Los Angeles, Riverside, and San Bernardino counties. Please visit: <http://www.aqmd.gov/nav/about/jurisdiction> for more information.
- The retiring vehicle must have operated a minimum of 7,000 miles during the 12 months prior to application.
- For the TRU truck option, the retiring unit must be the vehicle with the TRU. A "reefer", or TRU Trailer unit itself, is not eligible.

Eligible Replacement Vehicle

- The replacement vehicle must be brand new and battery-electric powered.
- The replacement vehicle powered by hydrogen or any fossil fuel is not eligible.
- The replacement vehicle must not be a retrofit, repower, or conversion.

- For the TRU Truck option, the replacement vehicle must be 100% battery electric for both propulsion and refrigeration.
- The replacement vehicle must be deployed no later than October 2026.
- The replacement vehicle must operate at least 75% within the South Coast AQMD jurisdiction for a minimum of 5 years.

Eligible Charger Equipment

- Projects may include the purchase of one new charging unit per vehicle, including the unit and charging connector(s), mount and/or pedestal.
- Ineligible costs for the charging unit include power distribution, electrical panels, upgrades to existing panel or electrical service, transformers, wiring/conduit, solar and wind power generation equipment, battery storage systems, and all installation costs.

BUILD AMERICA BUY AMERICA (BABA) REQUIREMENTS

All charging units funded through this program will be subject to requirements in the Build America, Buy America (BABA) Act. The manufacturer of the charging unit equipment must provide a certification letter of BABA compliance in company letterhead. A template of the letter can be found here: [Certification Letter Template for Manufactured Products Covered Under the Build America, Buy America Act \(https://www.epa.gov/system/files/documents/2025-01/baba-manuprod-cert-letter-template.pdf\)](https://www.epa.gov/system/files/documents/2025-01/baba-manuprod-cert-letter-template.pdf).

- For more information on BABA, please visit:
 - <https://www.epa.gov/baba>
 - [eCFR :: 2 CFR Part 184 -- Buy America Preferences for Infrastructure Projects](#)

OTHER FEDERAL REQUIREMENTS

If a charging unit is funded by this grant, compliance with the following Federal laws will be required for the charger installation work.

- Davis-Bacon and Related Acts (DBRA) is a collection of labor standards provisions administered by the Department of Labor that are applicable to grants involving construction. Under DBRA, all contractors and subcontractors performing construction must be paid no less than the locally prevailing wage and fringe benefits for corresponding work on similar projects in the area. Weekly certified payrolls must be submitted to South Coast AQMD and maintained for no less than three years after work completion. By accepting a contract under INVEST CLEAN, the selected applicant acknowledges and agrees to the terms provided in the DBRA Requirements for Contractors and Subcontractors Under EPA Grants: https://www.epa.gov/system/files/documents/2023-10/dbra_requirements_for_contractors_and_subcontractors_under_epa_grants.pdf
- Endangered Species Act (16 U.S.C. §1531 et seq.): The Endangered Species Act requires a biological assessment to determine if any endangered or threatened species, or their critical habitat, could be adversely affected by the proposed construction activities. The

assessment must be completed within 180 days after the date it was initiated and must be completed prior to any contract for construction and before any construction has begun. The assessment process is outlined as follows:

- A desktop review to identify species and habitats in the vicinity of the construction site using the U.S. Fish and Wildlife Service's (USFWS) IPaC tool: <https://ipac.ecosphere.fws.gov/>
 - If species or habitats are potentially impacted, a consultation with the USFWS may be required
 - Avoidance and Mitigation measures such as protective buffers, erosion control, and other Best Management Practices (BMP) may be proposed.
 - The USFWS must agree with the assessment and resolution before the project can commence.
 - Information on the Endangered Species Act: <https://www.epa.gov/laws-regulations/summary-endangered-species-act>
 - Procedures explained in 50 CFR Part 402: [50 CFR Part 402 -- Interagency Cooperation—Endangered Species Act of 1973, as Amended](#)
- National Historic Preservation Act (16 U.S.C. §470 et seq.): This Act requires a review of potential adverse effects of federally funded activities on historic properties listed or eligible for listing on the National Register. This review should be completed prior to applying for permits.
 - For more details see: <https://www.nps.gov/subjects/archeology/national-historic-preservation-act.htm>
 - Selected applicants under this RFP are to provide South Coast AQMD with documentation demonstrating compliance with the National Historic Preservation Act (16 U.S.C. §470 et seq.) A mapping tool such as the link below from the U.S. Department of the Interior can be utilized to determine whether the construction site impacts a registered national historical property: https://www.nps.gov/orgs/1094/nrhp_spatialdata.htm
 - The applicant must work with the EPA on any required consultation process with the State or Tribal Historic Preservation Office prior to commencing the project to ensure compliance with section 106 of the NHPA.
 - Archeological and Historic Preservation Act (54 U.S.C. §§ 312501-312508): Similar to the National Historic Preservation Act, this Act applies to federally funded activities. It requires historic and archeological objects and materials to be saved that would otherwise be destroyed as a result of the activity.
 - For more details see: <https://uscode.house.gov/view.xhtml?req=granuleid%3AU5C-prelim-title54-chapter3125&edition=prelim>

- Selected applicants under this RFP are to report to South Coast AQMD and the EPA any historical or archeological objects and materials found in the process of construction.
- Farmland Protection Policy Act (7 U.S.C. §4201 et. seq.): The purpose of this Act is to minimize or prevent the irreversible conversion of farmland to non-agricultural uses. This act would require identification of the effects federally funded activities may have on farmlands and to consider alternative options.
 - For more details see: <https://www.nrcs.usda.gov/conservation-basics/natural-resource-concerns/land/cropland/farmland-protection-policy-act>
 - Applicants selected under this RFP must demonstrate adherence to the Farmland Preservation Policy Act (7 U.S.C. §4201 et. Seq.)
 - <https://www.nrcs.usda.gov/conservation-basics/natural-resource-concerns/land/evaluation-and-assessment>
- Coastal Zone Management Act (16 U.S.C. § 1451 et. seq.): This act requires the review of federally funded activities to determine if the goal of the Act is being met: “preserve, protect, develop and where possible, to restore or enhance the resources of the nation’s coastal zone.”
 - For more details see: <https://coast.noaa.gov/czm/act/>
 - Applicants selected under this RFP are to consult with the California Coastal Commission to ensure that the applicant’s project will be consistent with the state’s coastal zone management plan.
 - Map of California Coastal Zone: <https://www.coastal.ca.gov/maps/>
 - Information about obtaining a permit: https://www.coastal.ca.gov/enforcement/cdp_pamphlet.pdf

REBATE AMOUNTS

Each vehicle or supporting charging unit can receive funding up to the maximum amounts specified in the table below.

| Equipment Type | Maximum Rebate |
|-----------------------|----------------|
| Class 6 & 7 Box Truck | \$ 190,000 |
| Class 6 & 7 Step Van | \$ 122,850 |
| Class 6 TRU Truck | \$ 273,000 |
| Class 7 TRU Truck | \$ 292,500 |
| Level 2 Charging Unit | \$ 25,000 |
| DCFC Charging Unit | \$ 70,000 |

Disclosure is required for any other funding sources or tax credits received for the project. Other sources of funding will need to be evaluated to determine if they can be used in conjunction with the Program. While Program grants can be combined with other grants and incentives, in no case may the total grant funds be greater than 100% of a project’s total cost.

PROJECT QUOTATIONS

All project costs must be clearly indicated in the application. Applicants must provide cost information that specifies the amount of funding requested and the basis for that request, including vendor quotes, with their applications. Applicants are responsible for providing an accurate quote for the proposed equipment. Vendor quotes must be dated within 90 days prior to the application submittal date.

PROGRAM WORKFLOW

The flowchart in Figure 1 depicts the lifecycle of a typical replacement project, while Table 1 below provides an explanation of each step.

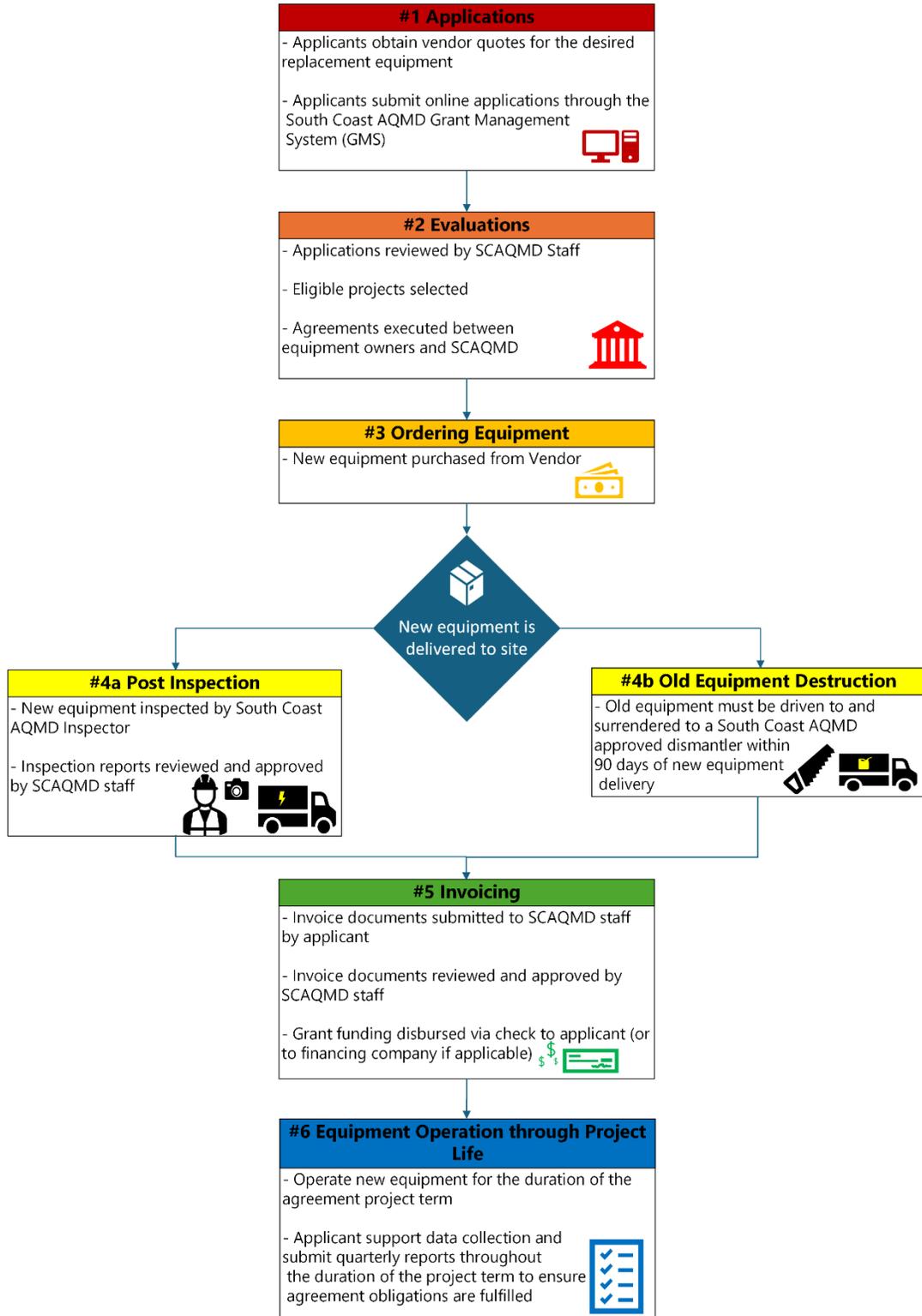


Figure 1: Lifecycle for CHDV Class 6/7 Vehicle Replacement Projects

| Chart Process # | Description of Process |
|---|--|
| 1 | Applicants submit ELECTRIC grant applications online through South Coast AQMD's GMS. Applicants will provide all necessary information and upload documentation as prompted by the GMS. |
| 2 | Upon receipt of a submitted application, South Coast AQMD staff will review the application to screen for completeness and project eligibility. If additional information, documentation or corrections are required, South Coast Staff will allow the applicant 14 days to provide any requested corrections and documentations. If an applicant has been approved for funding, an agreement will be executed between the applicant and South Coast AQMD. |
| 3 | Once an agreement has been fully executed, the applicant may proceed to order and purchase the new/replacement equipment from the equipment vendor. |
|  | New/replacement equipment is delivered to the applicant. Upon delivery, the applicant must inform South Coast AQMD staff. If applicant applied for a charger rebate, the applicant must inform South Coast AQMD when the charger has been commissioned. |
| 4a | An inspection of the new equipment will be performed. A South Coast AQMD Inspector will coordinate and inspection date and time with the applicant directly. Inspections may be performed either on-site or virtually via video or photograph at the inspector's discretion. This step is also applicable to the charging unit if the applicant applies for a charger rebate. |
| 4b | Upon delivery of the new/replacement equipment, the applicant will have 90 days to surrender the old/baseline vehicle to the authorized dismantler. |
| 5 | Applicant will submit an invoice to South Coast AQMD to request for payment. South Coast AQMD will confirm that applicants have met all program and agreement requirements before rebate payment can be issued. |
| 6 | Applicant will provide operational data of the new equipment as detailed in the rebate agreement. |

SECTION II – APPLICATION SUBMITTAL REQUIREMENTS

The electronic application in the GMS will prompt applicants for all required application information. Attachment A provides a listing of required application information. It is the responsibility of the Applicant to ensure that all information submitted to South Coast AQMD's GMS is accurate and complete.

All online applications must be submitted according to specifications set forth herein. Failure to adhere to these specifications may result in rejection of the application without evaluation.

Grounds for Rejection:

An application may be rejected if the application:

- Does not include all the mandatory information and documentation required via GMS.
- Is not signed by an individual authorized to represent the applicant.

Certifications and Representations

South Coast AQMD “Business Information Forms” will be available on the GMS and must be signed and submitted as part of the application.

Methods of Delivery:

The applicant must submit the application using the South Coast AQMD GMS. Multiple projects may be entered into a single application; however, for applicants with more than 10 projects, it is recommended that the applicant use additional applications to expedite GMS load times. Projects submitted by the same applicant will be evaluated as one application, unless otherwise specified in the submissions. Applicants are required to perform the first and final steps of initiating and submitting applications; however, the application may be filled in by a third-party consultant.

Disposition of Applications

The South Coast AQMD reserves the right to reject any or all applications. All responses become the property of the South Coast AQMD. The electronic copy of the application shall be retained for South Coast AQMD files. Please review the Access to Records and Retention disclaimer in SECTION VI – LEGAL UPDATES AND DEFINITIONS.

Modification or Withdrawal

Ensure that the information input and documentation uploaded are accurate and complete. Once submitted, applications cannot be altered unless requested by the South Coast AQMD staff. Applicants may submit more than one application per solicitation. Applications can be withdrawn through the GMS system.

SECTION III – APPLICATION EVALUATION/SELECTION CRITERIA

South Coast AQMD staff will evaluate and qualify submitted applications to determine which project(s) will be funded. South Coast AQMD staff may request additional information, documentation or corrections as required during their review of the application. The applicants will be allowed 14 calendar days to provide the requested corrections. If the requested information are not provided within 14 calendar days, the application will be placed to the end of the queue and may jeopardize funding eligibility.

There is a possibility that due to program priorities, project Applicants may be offered only partial funding, and not all applications that meet the evaluation criteria can be funded, if oversubscribed.

SECTION IV – PROJECT AGREEMENT

All applicants selected for funding awards must enter into a written agreement with the South Coast AQMD. The scope of work in the agreement will include tasks and deliverables that demonstrate compliance with the requirements of the EPA-funded ELECTRIC Program

administered by South Coast AQMD. The South Coast AQMD has no obligation to fund the project until an agreement is fully executed by both parties.

Agreements will include, at a minimum but not limited to, the following criteria:

- Be available for inspections by South Coast AQMD, if requested.
- Retired vehicles must be scrapped by a South Coast AQMD-authorized dismantler.
- Provide vehicle and charger data for monitoring and compliance.
- Register the new/replacement vehicle in California with the Department of Motor Vehicles (DMV).
- Maintain insurance on the new/replacement vehicle as required by law.
- Ensure operation of the new/replacement vehicle is within the South Coast AQMD jurisdiction and provide all necessary usage reports.
- The replacement vehicle is required to maintain a minimum of 7,000 miles a year, and 75% of which must be within the South Coast AQMD jurisdiction for the entire project life.
- The vehicle's manufacturer's warranty must be at least 3 years for the battery electric drivetrain.
- The vehicle vocation must be freight delivery

INSPECTIONS

Inspections will be performed on the newly deployed vehicles and equipment before issuing the rebates. Inspections of old vehicles or destruction of old vehicles may be conducted at the discretion of South Coast AQMD. Inspections of vehicles may be conducted virtually via video conference calls. Recipients must make all equipment available for in-person or remote inspections.

SCRAPPING REQUIREMENTS

The retiring vehicle must be scrapped in accordance with the following requirements:

- Retiring vehicle must be driven, not towed, to a South Coast AQMD-approved dismantler. A dismantler receipt must be collected by the applicant and provided to South Coast AQMD before the rebate can be processed.
- The retiring vehicle must be scrapped within ninety (90) days of the dismantler receipt.
- The scrapping method must include drilling a three-inch asymmetrical hole in the engine block and cutting the frame rail.
- Evidence of destruction will be provided by the approved dismantler and must include digital photos of the Vehicle Identification Number (VIN) tag, front, side profile, and rear of the vehicle, engine tag, before and after photos of the destroyed engine block, and cut frame rails or other cut structural components as applicable.

DELIVERABLES

The agreement will outline how the project will be monitored and what type of information will be included in project progress reports throughout the 5-year project life. At a minimum, the South Coast AQMD expects to receive the following:

- Annual reports consisting of Vehicle Miles Traveled (VMTs)/energy usage, vehicle registration, vehicle insurance, and other information as requested by the South Coast AQMD
- If the applicant received a charger rebate, the charger usage data in kWh will also be included in the report.

South Coast AQMD reserves the right to verify the information provided. Please review the Access to Records and Retention disclaimer in SECTION VI – LEGAL UPDATES AND DEFINITIONS.

PERFORMANCE

When a recipient is unable to meet the program requirements (e.g., annual reporting, operation, emission benefits, etc.) or terms specified in the agreement, South Coast AQMD may consider the options to remedy the violation before seeking enforcement action. In addition, when a recipient cannot meet the average usage requirements or terms specified in the contract, South Coast AQMD may consider that the average usage is less than the activity required in the agreement and seek remediation.

Options for non-performance include, but are not limited to, the following:

- Extending the project agreement to allow for the makeup of the usage requirement shortfall
- Transfer ownership of the new equipment to another entity committed to complying with the agreement and operating the equipment
- Return of the funds
- The owner will make its best effort to repair the equipment and assist with identifying a new operator.
- SCAQMD and EPA will review and approve the justification for the deployment failure before any ownership transfer can be authorized.

SECTION V – PAYMENT TERMS

For all projects, recipients shall provide:

- Proof of vehicle or charger purchase, including signed sale agreements and proof of payments.
- Proof of replacement vehicle registration, vehicle insurance, and warranty information
- Proof of fleet compliance with Truck and Bus Regulations
- Proof that the existing vehicle was surrendered to an authorized dismantler
- Proof that the charger has been commissioned and is fully operational

Payment will be made upon review and approval of the documentation listed above, verification via inspection of new vehicle or charger deployment, and verification via inspection of old/retiring vehicle destruction.

SECTION VI – LEGAL UPDATES AND DEFINITIONS

CONFIDENTIALITY

Please ensure that any trade secret, confidential or proprietary information being provided is marked accordingly. Please see the following website for more details:

<https://www.agmd.gov/docs/default-source/default-document-library/Guidelines/praguidelines.pdf>

ACCESS TO RECORDS AND RETENTION

Materials, reports, photos, and other documentation submitted pursuant to the project may be released in part or in whole pursuant to either the Freedom of Information Act or the California Public Records Act. The EPA or SCAQMD may make publicly available on their websites, copies or portions of project information.

EPA and SCAQMD also reserve the right to access records of the applicant/recipient pertinent to this award, to perform audits, execute site visits, or for any other official use. This right of access also includes timely and reasonable access to the applicant/recipient's personnel for the purpose of interviewing and discussion related to such documents or the Federal award in general. This right of access shall continue as long as the records are retained.

In accordance with 2 CFR 200.334, the recipient must retain all Federal award records, including but not limited to, financial records, supporting documents, and statistical records for at least three years from the date of submission of the final financial report. The records must be retained until all litigation, claims, or audit findings have been resolved and final action has been taken if any litigation, claim, or audit is started before the expiration of the three-year period. Examples of the required records include: (1) time and attendance records and supporting documentation; and (2) documentation of compliance with statutes and regulations that apply to the project. In accordance with 2 CFR 200.337, the EPA, the Inspector General, the Comptroller General, and the pass-through entity, or any of their authorized representatives, have the right of access to any documents, papers or records of the recipient which are pertinent to the grant award. The rights of access are not limited to the required retention period, but last as long as the records are retained.

USE OF LOGOS

Use of the EPA's logo, along with logos of other participating entities, on outreach materials, websites, or reports, must adhere to the requirements of both the General Terms and Conditions, Paragraph Q, and California Health and Safety Code Section 40730.

STATEMENT OF COMPLIANCE

Government Code Section 12990 and California Administrative Code, Title II, Division 4, Chapter 5, require employers to agree not to unlawfully discriminate against any employee or Applicant

because of race, religion, color, national origin, ancestry, physical handicap, medical condition, marital status, sex, or age. A statement of compliance with this clause is included in all South Coast AQMD Agreements for the Program.

COMPLIANCE WITH APPLICABLE LAWS

Applicants must comply with all federal, state, and local laws, ordinances, codes and regulations. If the application is selected for a funding award, all equipment to be purchased or installed must be compliant with all applicable federal, state, and local air quality rules and regulations, and will maintain compliance for the full Agreement term.

Applicants that receive rebates on vehicle chargers must be aware of the following legal requirements:

- Davis-Bacon and Related Acts (DBRA) is a collection of labor standards provisions administered by the Department of Labor that are applicable to grants involving construction. Under DBRA, all contractors and subcontractors performing construction must be paid no less than the locally prevailing wage and fringe benefits for corresponding work on similar projects in the area. Weekly certified payrolls must be submitted to South Coast AQMD and maintained for no less than three years after work completion. By executing an Agreement under INVEST CLEAN, the selected applicant acknowledges and agrees to the terms provided in the DBRA Requirements for Contractors and Subcontractors Under EPA Grants: https://www.epa.gov/system/files/documents/2023-10/dbra_requirements_for_contractors_and_subcontractors_under_epa_grants.pdf
- Endangered Species Act (16 U.S.C. §1531 et seq.): The Endangered Species Act requires a biological assessment to determine if any endangered or threatened species, or their critical habitat, could be adversely affected by the proposed construction activities. The assessment must be completed within 180 days after the date it was initiated and must be completed prior to any contract for construction and before any construction has begun. The assessment process is outlined as follows:
 - A desktop review to identify species and habitats in the vicinity of the construction site using the U.S. Fish and Wildlife Service's (USFWS) IPaC tool: <https://ipac.ecosphere.fws.gov/>
 - If species or habitats are potentially impacted, a consultation with the USFWS may be required
 - Avoidance and Mitigation measures such as protective buffers, erosion control, and other Best Management Practices (BMP) may be proposed.
 - The USFWS must agree with the assessment and resolution before the project can commence.
 - Information on the Endangered Species Act: <https://www.epa.gov/laws-regulations/summary-endangered-species-act>
 - Procedures explained in 50 CFR Part 402: [50 CFR Part 402 -- Interagency Cooperation—Endangered Species Act of 1973, as Amended](#)

- National Historic Preservation Act (16 U.S.C. §470 et seq.): This Act requires a review of potential adverse effects of federally funded activities on historic properties listed or eligible for listing on the National Register. This review should be completed prior to applying for permits. For more details see: <https://www.nps.gov/subjects/archeology/national-historic-preservation-act.htm>
 - Selected applicants under this Program Announcement are to provide South Coast AQMD with documentation demonstrating compliance with the National Historic Preservation Act (16 U.S.C. §470 et seq.) A mapping tool such as the link below from the U.S. Department of the Interior can be utilized to determine whether the construction site impacts a registered national historical property: https://www.nps.gov/orgs/1094/nrhp_spatialdata.htm
 - The applicant must work with the EPA on any required consultation process with the State or Tribal Historic Preservation Office prior to commencing the project to ensure compliance with section 106 of the NHPA.
 - For possible exemptions, please see: Section “IV. Test Exemption” on the bottom on page 662303: <https://www.achp.gov/sites/default/files/exemptions/2022-11/Exemption%20for%20Electric%20Vehicle%20Supply%20Equipment%2010.26.22.pdf>
- Archeological and Historic Preservation Act (54 U.S.C. §§ 312501-312508): Similar to the National Historic Preservation Act, this Act applies to federally funded activities. It requires historic and archeological objects and materials to be saved that would otherwise be destroyed as a result of the activity.
 - For more details see: <https://uscode.house.gov/view.xhtml?req=granuleid%3AUSC-prelim-title54-chapter3125&edition=prelim>
 - Selected applicants under this Program Announcement are to report to South Coast AQMD and the EPA any historical or archeological objects and materials found in the process of construction.
- Farmland Protection Policy Act (7 U.S.C. §4201 et. seq.): The purpose of this Act is to minimize or prevent the irreversible conversion of farmland to non-agricultural uses. This act would require identification of the effects federally funded activities may have on farmlands and to consider alternative options.
 - For more details see: <https://www.nrcs.usda.gov/conservation-basics/natural-resource-concerns/land/cropland/farmland-protection-policy-act>
 - Applicants selected under this Program Announcement must demonstrate adherence to the Farmland Preservation Policy Act (7 U.S.C. §4201 et. Seq.): <https://www.nrcs.usda.gov/conservation-basics/natural-resource-concerns/land/evaluation-and-assessment>
- Coastal Zone Management Act (16 U.S.C. § 1451 et. seq.): This act requires the review of federally funded activities to determine if the goal of the Act is being met: “preserve, protect, develop and where possible, to restore or enhance the resources of the nation’s coastal zone.”
 - For more details see: <https://coast.noaa.gov/czm/act/>

- Applicants selected under this Program Announcement may need to consult with the California Coastal Commission to ensure that the applicant's project will be consistent with the state's coastal zone management plan.
- Map of California Coastal Zone: <https://www.coastal.ca.gov/maps/>
- Information about obtaining a permit: https://www.coastal.ca.gov/enforcement/cdp_pamphlet.pdf
- Reporting Waste, Fraud and Abuse (2 CFR 200.113): Consistent with Federal requirements, applicants must promptly report in writing whenever there is credible evidence of the commission of a violation of federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations per the requirements outlined in EPA's General Terms and Conditions, Paragraph 51, which can be found at: https://www.epa.gov/system/files/documents/2024-10/fy_2025_epa_general_terms_and_conditions_effective_october_1_2024_or_later.pdf

CONFLICT OF INTEREST

Applicant must address any potential conflicts of interest with other clients affected by actions performed by the firm on behalf of South Coast AQMD. Although the Applicant will not be automatically disqualified by reason of work performed for such firms, the South Coast AQMD reserves the right to consider the nature and extent of such work in evaluating the application. Conflicts of interest will be screened on a case-by-case basis by the South Coast AQMD General Counsel's Office. Conflict of interest provisions of the state law, including the Political Reform Act, may apply to work performed pursuant to this program.

COMPLIANCE WITH LABOR LAWS

If an application is deemed eligible, the Applicant will be required to disclose any labor violations that have occurred within the last three years to be further considered for an award. If awarded, the recipient will be required to notify South Coast AQMD in writing if they have been found by a court or federal or state agency to have violated labor laws. The recipient will complete a yearly certification in which they will either state that they have not been found by a court or federal or state agency to have violated labor laws or, if such violations have been found, the recipient will give South Coast AQMD details about those violations in the certification. If the recipient has previously provided this information to the South Coast AQMD, they will be required to reattach that previous notification to the certification and provide any additional details about those violations that have not previously been provided. The recipient's yearly certification will be due at the same time as the annual progress reports. South Coast AQMD reserves the right to terminate the Agreement with a recipient that has been found to have violated labor laws, and the recipient may be required to return any and all funds, as determined by South Coast AQMD. The recipient will also ensure that these requirements are included in all downstream partnerships.

ECONOMIC SANCTIONS (RUSSIA/UKRAINE)

On March 4, 2022, Governor Gavin Newsom issued Executive Order N-6-22 (EO) regarding sanctions in response to Russian aggression in Ukraine. Applicants who are considered eligible

for funds under this PA and received executed contracts from South Coast AQMD, are obligated to comply with existing economic sanctions imposed by the U.S. government in response to Russia's actions in Ukraine.

DEFINITIONS

1. Agreement Term

Agreement term is the duration for which the Agreement is valid. It encompasses both the project completion and project implementation periods:

- i. Project completion period is the first part of the Agreement term starting from the date of Agreement execution by both parties to the date the project post-inspection confirms that the project has become operational.
- ii. Project implementation period is the second part of the Agreement term which begins when the replacement vehicle is deployed. The project implementation period ends when the operational period is completed..

2. Project

A project is a single vehicle scrap and replacement combination under ELECTRIC. A applicant may apply for multiple projects in a single application.

3. South Coast AQMD Jurisdiction

The South Coast AQMD is the air pollution control agency for all of Orange County and the urban portions of Los Angeles, Riverside and San Bernardino counties. Within Riverside County, the South Coast AQMD also has jurisdiction over the Salton Sea Air Basin and a portion of the Mojave Desert Air Basin. This area of 10,743 square miles is home to approximately 17 million people—about half the population of the state of California. It is the second most populated urban area in the United States and one of the smoggiest. Visit <http://www.aqmd.gov/nav/about/jurisdiction> for more information.

4. Vehicle Weight Class 6 and 7

Class 6 vehicles (Gross vehicle weight of 19,501 to 26,000 lb.)

Class 7 vehicles (Gross vehicle weight of 16,001 to 33,000 lb.)

5. Goods Movement

“Goods” are defined as having the same meaning in Commercial Code section 2105, which essentially requires that: The goods must be movable; and the goods being moved must be part of a transaction that involves a contract for the sale of the goods.

WORKSHOP FOR ADDITIONAL INFORMATION/ASSISTANCE:

Information on virtual pre-recorded presentations and other meetings (as needed) to be posted

PA2026-04

Questions regarding the content or intent of this PA, procedural matters, sample agreement, and the compliance plan worksheet can be found at the South Coast ELECTRIC website (<http://www.aqmd.gov/electric>), or can be addressed to:

Technology Advancement Office
South Coast AQMD
21865 Copley Drive
Diamond Bar, CA 91765

David Chen
Phone: (909) 396-3083
dchen@aqmd.gov

Mariel Maranan
Phone: (909) 396-2793
mmaranan@aqmd.gov

George Wu
Phone: (909) 396-2533
ayoon@aqmd.gov

Justin Joe
Phone: (909) 396-2054
jjoe@aqmd.gov

Andrew Yoon
Phone: (909) 396-3043
ayoon@aqmd.gov

Evelyn Aguilar
Phone: (909) 396-3148
eaguilar@aqmd.gov

Krystle Martinez
Phone: (909) 396-3021
kmartinez@aqmd.gov

ATTACHMENT A – PROJECT INFORMATION FORM

Please be prepared to provide the following information as prompted by the ELECTRIC GMS.

APPLICANT INFORMATION

| |
|---------------------|
| Applicant Name |
| Business Address |
| City, State and Zip |
| Phone |
| Contact Name |
| Title |
| E-mail Address |

FLEET INFORMATION

| |
|--|
| What is your current fleet size? |
| Is your company registered in TRUCRS |
| Provide TRUCRS ID (enter NA if not applicable) |

VEHICLE DESCRIPTION

| |
|--|
| Existing Vehicle Information: <ul style="list-style-type: none">• VIN• Vehicle Make• Vehicle Model• Vehicle Model year• GVWR• License plate• CHP CA Number• Primary Yard address• Compliance Documents for Regulations vehicle is subject to |
| Existing Engine Information: <ul style="list-style-type: none">• Engine Fuel Type• Engine Make• Engine Model• Engine Model Year• Engine Serial Number• Engine Family Number |

| |
|--|
| <ul style="list-style-type: none"> • ARB Certification Engine Executive Order Number |
| Operational Information <ul style="list-style-type: none"> • Percent Operation in South Coast Air Basin • Projected Future Percent Operation in South Coast Air Basin • Projected Future Annual Mileage • Current Odometer Reading |
| Replacement Vehicle/Engine Information <ul style="list-style-type: none"> • Replacement Vehicle Make • Replacement Vehicle Model • Replacement Vehicle Model Year • Replacement Vehicle GVWR • Primary Yard Address • ARB Vehicle Certification Executive Order Number • Odometer Reading of Replacement Vehicle |

CHARGING EQUIPMENT DESCRIPTION

| |
|--|
| Charger Make and Model |
| Charger Power Level (kW) |
| Total # of Chargers (must be less than or equal to the Total # of Vehicles in the application) |
| Vendor Information: <ul style="list-style-type: none"> • Vendor Name • Vendor Contact Name • Vendor Phone Number • Vendor Address |

PROJECT COST BREAKDOWN

| |
|---|
| Replacement Vehicle Cost (Including Tax) |
| Charger Cost (each) |
| Vendor Information (for both Vehicle and Charger if applicable): <ul style="list-style-type: none"> • Vendor Name • Vendor Contact Name • Vendor Phone Number • Vendor Address |

APPLICATION FUNDING SUMMARY

| |
|---|
| Total Amount requested from SCAQMD for all projects in this Equipment Category (Class 6/7 Goods Movement Vehicles) |
| Total Amount to be paid by Applicant for all projects in this Equipment Category (Class 6/7 Goods Movement Vehicles) |
| Funding From other Sources: <ul style="list-style-type: none"> • Name of Funding Entity • Funding Amount |

| |
|---|
| Total Cost of all replacement vehicles (Class 6/7 Battery Electric Goods Movement Vehicles) |
| Total Cost of all chargers |

REQUIRED ATTACHMENTS:

- Compliance documentation for entire fleet for all applicable regulations
- Vehicle Title for vehicle to be retired
- Photo of VIN label
- Photo of GVWR label
- Photo of Engine Emission Control Label
- Photo of Engine Info/Serial Number Tag
- ARB Certification Engine Executive Order for Retiring Engine
- Photo of Current Odometer Reading
- Insurance for the past 12 months
- Registration for the past 12 months
- Odometer/Operational/GPS Records for past 12 months
- New Vehicle Quote (Within 90 Days)
- ARB Certification Engine Executive Order for Replacement Engine
- Business Information Request (BIR)
- Campaign Contribution Disclosure
- W-9 Request for Taxpayer Identification Number and Certification
- Direct Deposit Form
- 590 Withholding Exemption Certificate
- Certificate Regarding Debarment, Suspension, and Other Responsibility Matters
- Labor Law Compliance form

BOARD MEETING DATE: August 1, 2025

AGENDA NO. 5

PROPOSAL: Establish Lists of Prequalified Contractors for Legal Services, and for Occupational Health and Medical Services; Authorize Contracts and Funding for Services; and Execute a Contract for Insurance Brokerage Services

SYNOPSIS: On January 10, 2025, the Board approved the release of RFPs to prequalify outside legal counsel for employee and labor relations matters, occupational health and medical services providers, and insurance brokerage services. This action is to establish lists of prequalified legal counsel, and occupational health and medical services providers, and to authorize contracts and funding for these services. This action is also to execute a three-year contract with Alliant Insurance Services, Inc. for insurance brokerage services, in an amount not to exceed \$149,960 for the contract term. Funding is available in the FY 2025-26 Budget and will be requested in successive fiscal years.

COMMITTEE: Administrative, June 13, 2025; Recommended for Approval

RECOMMENDED ACTIONS:

1. For the RFP to prequalify outside legal counsel:
 - a. Approve the law firms listed in Attachment I as prequalified to provide employee and labor relations legal services through June 30, 2028; and
 - b. Authorize the Executive Officer to execute contracts or amendments, with the option to fund and extend contracts through June 30, 2030, with these firms, in a total amount not to exceed \$300,000 per fiscal year.
2. For the RFP to prequalify occupational health and medical services providers:
 - a. Approve the occupational health and medical services providers listed in Attachment II as prequalified to provide these services through June 30, 2028; and
 - b. Authorize the Executive Officer to execute contracts and amendments, with the option to fund and extend contracts through June 30, 2030, with these providers, in a total amount not to exceed \$109,250 per fiscal year.

3. Authorize the Executive Officer to execute a contract with Alliant Insurance Services, Inc. – the sole responder to the RFP for insurance brokerage services - from October 1, 2025, through September 30, 2028, for an amount not to exceed \$149,960, with the option to fund and extend the contract for two additional years.

Wayne Nastri
Executive Officer

AJO:VL:mc

Background

RFP #P2025-08 was released on January 10, 2025, to seek proposals from law firms interested in being prequalified to provide specified legal services that include advising and representing South Coast AQMD on various employee and labor relations matters, and providing legal advice and formal opinions with respect to employer-employee matters to assist South Coast AQMD in meeting its legal obligations as an employer and in achieving fair and effective relations with employees and labor unions.

RFP #P2025-10 was released on January 10, 2025, to seek proposals from providers interested in being prequalified to provide occupational health and medical services. Occupational health and medical services provided by companies on the prequalified list will include medical examinations of employees to fit respiratory protection equipment, pre-employment exams, and return-to-work authorization.

RFP #P2025-09 was released on January 10, 2025, to seek proposals from insurance brokers interested in providing these services. Insurance brokerage services include assisting South Coast AQMD in marketing its property and liability insurance needs, and representing South Coast AQMD in the negotiation and placement of various insurance programs. Alliant Insurance Services, Inc. submitted the only proposal in response to the RFP. South Coast AQMD currently contracts with Alliant Insurance Services, Inc., and the contract is set to expire on September 30, 2025.

Outreach

In accordance with South Coast AQMD's Procurement Policy and Procedure, a Public Notice advertising the RFPs and inviting bids was published in the Los Angeles Times, the Orange County Register, the San Bernardino Sun, Riverside County's Press Enterprise, and the Sacramento Bee newspapers, to leverage the most cost-effective method of outreach to the South Coast region.

Additionally, Public Notice of the RFPs were e-mailed to legislative caucuses, various minority chambers of commerce and business associations, and placed on South Coast

AQMD's website (<http://www.aqmd.gov>) where they can be viewed by making the selection "Grants & Bids."

Bid Evaluation

Five proposals were received in response to the RFP #P2025-08 for outside legal counsel. The proposals were evaluated by a three-member panel consisting of the South Coast AQMD DEO of Administrative and Human Resources, a Senior Deputy District Counsel, and an outside Assistant General Counsel. Four proposals were deemed qualified to provide employee and labor relations legal services, as shown on Attachment 1.

Two proposals were received in response to the RFP #P2025-10 for occupational health and medical services providers. The proposals were evaluated by a three-member panel consisting of a South Coast AQMD Human Resources Manager (Risk Management), a Human Resources Analyst, and a retired South Coast AQMD Facilities Services Technician. All proposals were deemed qualified to provide occupational health and medical services, as shown on Attachment 2.

One proposal was received in response to the RFP #P2025-09 for insurance brokerage services. The proposal was evaluated by a three-member panel consisting of a South Coast AQMD Human Resources Manager (Risk Management), a Human Resources Analyst, and a retired South Coast AQMD Facilities Services Technician. The proposal was deemed qualified to provide insurance brokerage services.

Proposal

This proposal is to establish a list, valid through June 30, 2028, of four law firms and two occupational health and medical services providers that have been prequalified to provide specified services for South Coast AQMD. The recommended list of pre-qualified law firms and occupational health and medical services providers is set forth in Attachments I and II, respectively.

This proposal is also to authorize the Executive Officer to execute contracts, or modify existing contracts, with one or more of the law firms, in a combined amount not to exceed \$300,000 per fiscal year for employee and labor relations services; and to execute contracts, or modify existing contracts, with one or more of the providers in a total amount not to exceed \$109,250 per fiscal year for occupational health and medical services. Staff also seeks approval of the option to fund and extend contracts from these prequalified lists for up to an additional two years, through June 30, 2030.

Additionally, this proposal is to execute a three-year contract with Alliant Insurance Services, Inc., for a total amount not to exceed \$149,960. Staff also seeks approval of the option to fund and extend the contract for up to an additional two years, through June 30, 2030.

Resource Impacts

Funding of \$200,000 for employee and labor relations services has been approved in the FY 2025-26 budget. If additional funding (up to \$100,000) for these contracts is needed in FY 2025-26, it may be obtained through the transfer of existing department budget allocations. For subsequent budget years, additional funds will be requested.

Sufficient funds of \$109,250 for occupational health and medical services were approved in the FY 2025-26 budget, and additional funds will be requested in subsequent budgets.

Annual costs for the contract with Alliant Insurance Services, Inc. are \$49,000 for FY 2025-26, \$49,980 for FY 2026-27, and \$50,980 for FY 2027-28. Funding for the first year was requested in the FY 2025-26 Budget, and additional funds will be requested in subsequent budgets.

Attachments

Attachment I: Recommended List of Prequalified Legal Counsel to Provide Employee and Labor Relations Legal Services

Attachment II: Recommended List of Prequalified Occupational Health and Medical Services Providers

ATTACHMENT I

EVALUATION OF PROPOSALS FOR RFP #P2025-08

Prequalified Legal Counsel to Provide Employee and Labor Relations Legal Services

| Rank | Firm/Lead Attorney | Evaluation Score | Experience Score | Cost Score | Additional Points | Total Score |
|-------------|--|-------------------------|-------------------------|-------------------|--------------------------|--------------------|
| 1 | LIEBERT CASSIDY WHITMORE | 40 | 30 | 29.5 | 0 | 99.5 |
| 2 | MUSICK, PEELER & GARRETT, LLP | 33.3 | 27 | 30 | 4 | 94.3 |
| 3 | ATKINSON, ANDELSON, LOYA, RUUD & ROMA | 39.3 | 30 | 22 | 2 | 93.3 |
| 4 | FISHER & PHILLIPS LLP | 38.7 | 28 | 18.2 | 0 | 84.9 |

ATTACHMENT II

EVALUATION OF PROPOSALS FOR RFP #P2025-10

Prequalified Occupational Health and Medical Services Providers

| Rank | Provider | Scope of Work Score | Qualifications Score | Prior Experience Score | Cost Score | Additional Points | Total Score |
|-------------|----------------------------------|----------------------------|-----------------------------|-------------------------------|-------------------|--------------------------|--------------------|
| 1 | Concentra Medical Centers | 30 | 23.3 | 10 | 30 | 4 | 97.3 |
| 2 | University of California, Irvine | 30 | 28.3 | 10 | 20 | 0 | 88.3 |

BOARD MEETING DATE: August 1, 2025

AGENDA NO. 6

PROPOSAL: Authorize Executive Officer to Negotiate and Execute MOU With County of Riverside Transportation Department for Assembly Bill 617 Eastern Coachella Valley Paving Projects and Reimburse County of Riverside Transportation Department for Administrative Costs

SYNOPSIS: Through community-led participatory budgeting workshops in 2021, the Assembly Bill 617 (AB 617) Eastern Coachella Valley (ECV) Community Steering Committee prioritized \$4.57 million in Year 3 Community Air Protection Incentive funding for implementation of paving projects within the ECV community. The County of Riverside Transportation Department is qualified to implement paving projects in the AB 617 ECV community. South Coast AQMD will partner with the County of Riverside Transportation Department through an MOU agreement to initiate the paving projects. These actions are to: 1) authorize the Executive Officer to negotiate and execute an MOU with the County of Riverside Transportation Department to pave prioritized properties in ECV; (2) appropriate up to \$4.57 million from the Community Air Protection AB 134 Fund (77) to spend towards the implementation of paving projects in ECV; and (3) reimburse the County of Riverside Transportation Department for construction, administrative and contingency costs.

COMMITTEE: Stationary Source, June 20, 2025; Recommended for Approval

RECOMMENDED ACTIONS:

1. Authorize the Executive Officer to negotiate and execute an MOU with the County of Riverside Transportation Department to implement paving projects in ECV;
2. Appropriate up to \$4.57 million from the Community Air Protection AB 134 Fund (77) to spend towards the implementation of paving projects in ECV; and
3. Authorize the Executive Officer to reimburse the County of Riverside Transportation Department a total amount not to exceed \$4.57 million from Community Air Protection AB 134 Fund (77) to spend towards implementation of paving projects, including up to twenty-five percent (25%) of the total project cost

for Project Documents, Project Advertisement and Contract Awarding, Construction Administration and Performance Monitoring and Reporting, and up to ten percent (10%) of the total project cost will be budgeted for contingency costs (i.e., unforeseen costs such as material acquisition, inflation, construction cost overrun, etc.).

Wayne Nastri
Executive Officer

AHJ:WS:RD:PM

Background

Assembly Bill (AB) 617 was signed into California state law in July 2017 and focuses on improving air quality and reducing exposure to criteria air pollutants and toxic air contaminants in communities most impacted by air pollution. AB 617 recognizes these disproportionate impacts and seeks to address this through community-driven actions focused on developing and implementing Community Emission Reductions Plans (CERPs) and Community Air Monitoring Plans.

Since 2018, CARB has designated six AB 617 communities within South Coast AQMD's jurisdiction. As directed by AB 617, South Coast AQMD worked with each community to develop a CERP under the guidance of their respective Community Steering Committee (CSC). Each CSC is comprised of residents, community-based organizations, schools, public agencies, businesses, and other relevant community stakeholders. Each CSC identifies their top air quality concerns and actions to address them in their respective CERPs.

Eastern Coachella Valley (ECV) was designated as a South Coast AQMD AB 617 community in 2019. During the CERP development process, one of the community priorities expressed by CSC members was emissions from PM10 from unpaved roadways. Wind gusts and vehicular activities on unpaved roadways are major sources of fugitive dust, which primarily consists of PM10.

In 2021, through community-led participatory budget working team meetings, the ECV CSC prioritized \$4.57 million in Community Air Protection (CAP) incentive funds for implementing paving projects in the ECV community. In collaboration with the ECV Budget Working Team, staff developed the Paving Project Plan which was approved by CARB in October 2022. The Paving Project Plan was subsequently revised by CARB in April 2025 to incorporate modifications in administrative costs and provisions to allow South Coast AQMD to use alternative procedures, such as executing an MOU, if no

applications were received via the public solicitation process, or applications received do not result in an executed contract.

South Coast AQMD released Program Announcements PA2024-01 and PA2024-01R in September 2023 and February 2024, respectively, to solicit applications to implement paving projects in the ECV community. Applications received were rejected either due to non-compliance with submittal requirements or non-cooperation of the applicant during the contract development process and no contracts were issued.

Proposal

Staff is seeking Board approval to collaborate with the County of Riverside Transportation Department on an MOU for an amount up to \$4.57 million from the CAP incentive funds to implement road paving projects in the ECV community. The County of Riverside Transportation Department will be responsible for administering and overseeing the paving projects' implementation including hiring road paving contractors and obtaining necessary paving property documentation. South Coast AQMD will make payments on a reimbursement basis to the County of Riverside Transportation Department throughout the duration of the paving project until the project funding has been depleted, or the project has been terminated. Also, the CAP Program Guidelines allow project costs up to 25% of the funds for non-construction costs, including permitting, design, and administration, and up to 10% may be budgeted for contingency costs, supported by appropriate documentation. These costs are included as part of the \$4.57 million allocated by the ECV community for the implementation of paving projects. The MOU will require the County of Riverside Transportation Department to submit monthly project reports summarizing the paving project implementation status.

Lastly, based upon the demand and spending down of the allocated amount of \$4.57 million for road paving projects, staff may seek Board approval for subsequent funding on additional road paving projects in the ECV community.

Benefits to South Coast AQMD

Emissions of PM10 from unpaved roadways was one of the major community priorities expressed by the ECV community. Paving unpaved roadways will reduce PM10 emissions from these sources within the ECV community and will improve public health.

Resource Impacts

Sufficient funding is available for the implementation of paving projects within the ECV community and will be provided by Community Air Protection AB 134 Fund (77).

BOARD MEETING DATE: August 1, 2025

AGENDA NO. 7

PROPOSAL: Approve Modified Contract Award, Contract Modification, and Fund Transfer for Miscellaneous and Direct Expenditures Costs in FY 2025-26 as Approved by MSRC

SYNOPSIS: As part of their FYs 2024-27 Work Program, the MSRC approved a value increase to the contract with Geographics for hosting and maintenance of the MSRC's website. The MSRC also approved the addition of FM Harbor LLC as a party to a previous award to Forum Mobility Inc. to install electric vehicle service equipment in partial fulfillment of MOUs with the Ports of Long Beach and Los Angeles. Additionally, every year the MSRC adopts an Administrative Budget which includes transfer of funds to the South Coast AQMD Budget to cover administrative expenses. The MSRC seeks Board approval of the contract and award modifications and fund transfer.

COMMITTEE: Mobile Source Air Pollution Reduction Review, June 12, 2025; Recommended for Approval

RECOMMENDED ACTIONS:

1. Approve a \$1,800 increase to existing Contract #MS21006 with Geographics, the MSRC's current website maintenance contractor, to cover any unanticipated maintenance needs prior to the site's transition to a new host, as part of approval of the FYs 2024-27 Work Program, as described in this Board Letter;
2. Approve the addition of FM Harbor LLC as a party to previously approved not to exceed \$6,000,000 contract award to Forum Mobility Inc. to install electric vehicle service equipment (EVSE) at the Port of Long Beach using funds from the Port of Long Beach and Port of Los Angeles EVSE Infrastructure Projects Special Revenue Fund (92) as described in this Board Letter;
3. Recognize up to \$56,000 in revenue in the General Fund from the AB 2766 Discretionary Fund, Special Fund 23, and appropriate up to \$56,000 to the FY 2025-26 Technology Advancement Office Budget, Services and Supplies Major Object, to facilitate the payment of MSRC Miscellaneous Direct and Travel Costs, as provided in Table 1 of this Board Letter; and

4. Authorize the Chair (or the Chair's designee) to execute the contracts as described above and in this Board Letter.

Larry McCallon
Chair, MSRC

AK:CR

Background

In September 1990, Assembly Bill 2766 was signed into law (Health & Safety Code Sections 44220–44247) authorizing an annual \$4 motor vehicle registration fee to fund the implementation of programs exclusively to reduce air pollution from motor vehicles. AB 2766 provides that 30 percent of the annual \$4 vehicle registration fee subvended to South Coast AQMD be placed into an account to be allocated pursuant to a work program developed and adopted by the MSRC and approved by the Board.

Proposal

At its June 12, 2025 meeting, the MSRC considered recommendations from its MSRC-TAC and approved the following:

Implementation of MOUs with Ports for Electric Vehicle Support Infrastructure

To effectuate projects specified in MOUs between the Port of Long Beach (POLB) and Port of Los Angeles (POLA) and South Coast AQMD on behalf of the MSRC, previously the MSRC and South Coast AQMD approved three awards for zero emission drayage truck charging infrastructure projects with funds from POLB/POLA EVSE Infrastructure Projects Special Revenue Fund (92). One of these awards was to Forum Mobility Inc. in an amount not to exceed \$6,000,000 to install EVSE at the POLB. After the award, staff was notified that another entity, FM Harbor LLC, now holds title to the charging infrastructure. In order to enhance accountability and enforceability in the administration of the project, it was recommended to approve the addition of FM Harbor LLC as a party to the proposed agreement. The MSRC considered and approved the addition of FM Harbor LLC as a party to the agreement.

MSRC Website Hosting and Maintenance

The MSRC's [website](#) is a critical tool for the operation of the MSRC's programs. The current contract with Geographics for hosting and maintenance of the website will expire in September 2025. The MSRC has selected a successor firm to host and maintain the website, and these tasks will be transitioned within the next three months. Based on the time and balance remaining on the current Geographics contract, it was recommended to increase the contract value by \$1,800 to cover any unanticipated maintenance needs to ensure that the website remains operational with uninterrupted service and functionality. The MSRC considered and approved a \$1,800 contract value increase.

FY 2025-26 Administrative Budget

Every year the MSRC adopts an Administrative Budget for the upcoming fiscal year to ensure costs remain within the limitation, currently 6.25 percent. For FY 2025-26, the MSRC adopted an Administrative Budget in the amount of \$1,011,185, which is \$30,288 below the 6.25 percent cap. Administrative expenditures such as postage and office supplies are not directly drawn from the MSRC fund account, but instead from South Coast AQMD’s budget. To cover these expenses, the MSRC approved up to a \$56,000 fund transfer to South Coast AQMD (see Table 1 for further details).

Table 1.

Estimated FY 2025-26 MSRC Miscellaneous and Direct Expenditures Proposed to be Allocated to South Coast AQMD Technology Advancement Office FY 2025-26 Budget

| | Work Program Code | Account | Amount |
|---------------------------------|--------------------------|----------------|-----------------|
| Professional & Special Services | 44003 | 67450 | \$9,000 |
| Public Notice | 44003 | 67500 | \$8,000 |
| Communications | 44003 | 67900 | \$5,000 |
| Postage | 44003 | 68060 | \$7,500 |
| Office Expense/Supplies | 44003 | 68100 | \$12,000 |
| Miscellaneous Expense | 44003 | 69700 | \$7,000 |
| Conference-Related Expense | 44003 | 69700 | \$5,000 |
| Travel Costs | 44003 | 67800 | \$2,500 |
| Total | | | \$56,000 |

Appropriations and revenues for staff salaries have previously been approved by South Coast AQMD Board.

At this time, the MSRC requests that South Coast AQMD Board approve the contract modification and fund transfer as part of approval of the FYs 2024-27 Work Program as outlined above.

Resource Impacts

South Coast AQMD acts as fiscal administrator for the AB 2766 Discretionary Fund Program (Health & Safety Code Section 44243). Money received for this program is recorded in a special revenue fund (Fund 23) and the contract specified herein will be drawn from this fund.

[↑ Back to Agenda](#)

BOARD MEETING DATE: August 1, 2025

AGENDA NO. 8

REPORT: Legislative, Public Affairs and Media Report

SYNOPSIS: This report highlights the May and June 2025 outreach activities of the Legislative, Public Affairs and Media Office, which includes: Major Events, Community Events/Public Meetings, Environmental Justice Update, Speakers Bureau/Visitor Services, Communications Center, Public Information Center, Small Business Assistance, Media Relations, and Outreach to Community Groups and Governments.

COMMITTEE: No Committee Review

RECOMMENDED ACTION:
Receive and file.

Wayne Nastri
Executive Officer

LT:AL:PC:DS:cb:bel:jl:lb

Background

This report summarizes the activities of the Legislative, Public Affairs and Media Office for May and June. The report includes Major Events, Community Events/Public Meetings, Environmental Justice (EJ) Update, Speakers Bureau/Visitor Services, Communications Center, Public Information Center, Small Business Assistance, Media Relations, and Outreach to Community Groups and Governments.

Major Events (Hosted and Sponsored)

Each year, staff engage in hosting and sponsoring several major events throughout South Coast AQMD's four-county jurisdiction to promote, educate, and provide important information to the public regarding reducing air pollution, protecting public health, and improving air quality while minimizing economic impacts.

Move LA

On May 16, South Coast AQMD sponsored and participated in Move LA's 2025 Community Conversation and Policy Conference in Los Angeles with approximately 200 attendees.

Greater Riverside Chambers of Commerce

On May 20, South Coast AQMD sponsored and participated in the Greater Riverside Chambers of Commerce 2025 Infrastructure Summit with approximately 150 attendees.

Community Events/Public Meetings

Staff engaged with residents and stakeholders of diverse communities to provide information about the agency, incentive programs, and ways individuals can help reduce air pollution through events and meetings sponsored by South Coast AQMD or in partnership with others. Attendees typically receive information regarding the following:

- Tips on reducing their exposure to smog and its negative health effects;
- How to file a complaint;
- Clean air technologies and their deployment;
- Invitations to or notices of conferences, seminars, workshops, and other public events;
- South Coast AQMD incentive programs;
- Funding/grant opportunities by South Coast AQMD and partner agencies;
- Ways to participate in South Coast AQMD's rules and policy development; and
- Assistance in resolving air pollution-related problems.

Staff attended and/or provided information and updates at the following May and June events and meetings:

Lake Arrowhead

On May 1, staff participated in a Lake Arrowhead Municipal Advisory Council meeting to provide a brief overview of the agency and a summary of Proposed Amended Rules 1111 - Reduction of NOx Emissions from Natural-Gas-Fired Furnaces; and 1121 - Reduction of NOx Emissions from Residential Type, Natural-Gas-Fired Water Heaters (PARs 1111 and 1121), including the South Coast AQMD's PARs 1111 and 1121 Myth vs. Fact handout.

Harbor Association of Industry and Commerce

On May 1, staff participated in a Harbor Association of Industry and Commerce's Government Affairs Committee meeting to provide brief updates on PARs 1111 and 1121 and Proposed Rule 2304 - Commercial Marine Ports (PR 2304).

2025 Regional Conference and General Assembly

On May 1, staff hosted a resource booth at the Southern California Association of Governments' 2025 Regional Conference and General Assembly. Staff provided information on PARs 1111 and 1121, Myth vs. Fact handout, how to file an air quality complaint, the South Coast AQMD App, and the Residential and Commercial Electric Lawn and Garden Equipment (eL&G) programs.

El Segundo

On May 2, staff participated in a City of El Segundo Environmental Committee meeting to provide updates on PARs 1111 and 1121 and Myth vs. Fact handout.

Earth Day

On May 3, staff hosted a resource booth at the City of Calimesa's Annual Earth Day event. Information provided included how to file an air quality complaint, how to download the South Coast AQMD App, the Residential eL&G program, Residential EV Charging Incentive Program, and the Air Quality Index (AQI).

World Asthma Day

On May 6, staff participated in the Los Angeles County Department of Public Health Service Provider Area 7 World Asthma Day Health Resource Fair, hosting a booth with information on how to file an air quality complaint, the South Coast AQMD App, the AQI, PARs 1111 and 1121, Myth vs. Fact handout, and the Residential eL&G program.

Reach Out

On May 6, staff participated in a Healthy Jurupa Valley Reach Out meeting to provide an update on PARs 1111 and 1121 and Myth vs. Fact handout.

South Bay Association of Chambers of Commerce

On May 6, staff participated in a South Bay Association of Chambers of Commerce meeting to provide updates on PARs 1111 and 1121 and Myth vs. Fact handout.

Upland Chamber of Commerce

On May 8, staff participated in an Upland Chamber of Commerce Government Affairs Committee meeting to provide updates on PARs 1111 and 1121.

Fountain Valley Chamber of Commerce

On May 8, staff participated in a Fountain Valley Chamber of Commerce Government Affairs Committee meeting to provide an update on PARs 1111 and 1121, including how to submit comments.

Big Bear Chamber of Commerce

On May 8, staff participated in a Big Bear Chamber of Commerce Government Affairs Committee meeting to provide an update on PARs 1111 and 1121, including how to submit comments on the proposed rules.

Inland Empire Resource Conservation District

On May 8, staff participated in an Inland Empire Resource Conservation District meeting to share information regarding the Commercial eL&G program and the Carl Moyer Memorial Air Quality Standards Attainment Program (Carl Moyer Program).

Orange County Business Council

On May 9, staff participated in an Orange County Business Council Government Affairs Committee meeting to share information regarding the Carl Moyer Program and PARs 1111 and 1121 and Myth vs. Fact handout.

Santa Ana Chamber of Commerce

On May 13, staff participated in a Santa Ana Chamber of Commerce Government Affairs Committee meeting to share information on the Carl Moyer Program, and the upcoming Stationary Source Committee meeting and the public hearing for PARs 1111 and 1121.

South Pasadena Chamber of Commerce

On May 14, staff participated in a South Pasadena Chamber of Commerce Legislative Affairs Committee meeting to provide an update on the Eaton area air monitoring, the Carl Moyer Program, the Volkswagen Environmental Mitigation Trust funding opportunity, and PARs 1111 and 1121 and Myth vs. Fact handout.

Greater Riverside Chambers of Commerce

On May 16, staff participated in a Greater Riverside Chambers of Commerce Government Affairs Committee meeting to provide an update on PARs 1111 and 1121 and Myth vs. Fact handout.

Vernon

On May 20, staff participated in a City of Vernon meeting to provide information regarding an upcoming South Coast AQMD Infrastructure, Vehicles, and Equipment Strategy for Climate, Equity, Air Quality, and National Competitiveness (INVEST CLEAN) virtual workshop for Heavy-Duty Vehicle Charging Infrastructure, Freight Vehicles, Cargo Handling Equipment, and Switcher Locomotives.

Inglewood

On May 20, staff participated in a City of Inglewood Council meeting to provide information regarding the Carl Moyer Program.

Open House

On May 21, staff hosted a resource booth at San Bernardino County Supervisor Curt Hagman's Summer BBQ and Open House. Staff provided information on how to file an air quality complaint, how to download the South Coast AQMD App, the Residential eL&G program, Residential EV Charging Incentive Program, and the AQI.

Greater Ontario Business Council

On May 22, staff participated in a Greater Ontario Business Council Government Affairs committee meeting to share information regarding an INVEST CLEAN virtual workshop and PARs 1111 & 1121.

South Bay Association of Chambers of Commerce

On June 3, staff participated in the South Bay Association of Chambers of Commerce meeting to share the Carl Moyer Program announcements and updates on PARs 1111 and 1121.

Lake Arrowhead Communities Chamber of Commerce

On June 3, staff participated in the Lake Arrowhead Communities Chamber of Commerce Government Affairs Committee to share updates on PARs 1111 and 1121 and INVEST CLEAN.

Greater Ontario Business Council

On June 4, staff participated in the Greater Ontario Business Council's Good Morning Ontario meeting to provide information on the Small Business Assistance program, the Permit Checklist, and how to file an air quality complaint.

Harbor Association of Industry and Commerce

On June 5, staff participated in the Harbor Association of Industry and Commerce Government Affairs Committee meeting to share updates on PARs 1111 and 1121, the upcoming Proposed Rule 2304 - Commercial Marine Ports Working Group meeting, and the Residential eL&G exchange event.

OC Green Expo

On June 7, staff provided a resource booth at the Anaheim Public Utilities' OC Green Expo event to share information on the Residential eL&G exchange event, Residential EV Charging Incentive Program, how to file an air quality complaint, and South Coast AQMD App.

Women's Wellness Fair

On June 7, staff participated in Los Angeles Councilmember Adrin Nazarian's Women's Wellness Fair to provide information on how to file an air quality complaint and the South Coast AQMD App.

South Pasadena Chamber of Commerce

On June 11, staff participated in the South Pasadena Chamber of Commerce Legislative Affairs Committee meeting to share the Eaton stationary air monitoring data and the Residential eL&G exchange event.

Chino Valley Chamber of Commerce

On June 12, staff participated in the Chino Valley Chamber of Commerce Legislative Advocacy Roundtable to share the upcoming Residential eL&G exchange event.

Corona Del Mar Chamber of Commerce

On June 12, staff participated in the Corona Del Mar Chamber of Commerce Community and Government Affairs Committee meeting to share how to file an air quality complaint and how to download the South Coast AQMD App.

Sunland Senior Center

On June 12, staff hosted a booth at Sunland Senior Center's Father's Day event to provide information on how to file an air quality complaint and the South Coast AQMD App.

Vernon

On June 17, staff participated in the City of Vernon Council meeting to share information on the Residential eL&G exchange event.

San Gabriel Valley Economic Partnership

On June 25, staff participated in the San Gabriel Valley Economic Partnership Legislative Action Committee meeting to share updates on Eaton stationary air monitoring data and the Carl Moyer Program.

Orange County Council of Governments

On June 26, staff participated in the Orange County Council of Governments Board of Directors meeting to provide information on the California Electric Vehicle Infrastructure Project 2.0 – Fast Charge California Project.

Environmental Justice (EJ) Update

The following are key EJ-related activities in which staff participated during May and June. These events and meetings involve communities affected disproportionately by adverse air quality impacts.

Sugar Hill Elementary School – Career Day

On May 2, staff participated in Sugar Hill Elementary School's Career Day to provide information regarding the Clean Air Program for Elementary Students (CAPES), environmental careers, and how to file an air quality complaint.

School Visits

On May 13-14, staff visited several schools to provide information regarding the CAPES and WHAM programs, how to file an air quality complaint, the South Coast AQMD App, and wildfire safety information. Schools included:

- Casey Elementary School, Rialto
- Parkside Elementary School, San Bernardino
- Ganesha High School, Pomona
- Schurr High School, Montebello
- St. Mary's Academy, Inglewood

Sustain OC Foundation's Sustainable Campus Challenge

On May 20, staff participated in the Sustain OC Foundation's Sustainable Campus Challenge. As part of the challenge, students conduct a sustainability audit of their schools, identify potential improvements, and present their findings to a panel of judges.

Environmental Justice Advisory Group

On May 23, South Coast AQMD hosted the second quarterly Environmental Justice Advisory Group (EJAG) meeting. Presentations included an overview of South Coast AQMD's web tool, Facility Information Detail (F.I.N.D.) and an update on the AB 617 program.

Collegiate Charter High School Career Day

On May 28, staff participated in Collegiate Charter High School of Los Angeles' Career Day to provide information regarding WHAM, environmental careers, and how to file an air quality complaint.

Coachella Valley Unified School District

On June 3, staff visited Coachella Valley Unified School District to provide information on the CAPES and WHAM programs, environmental careers, and how to file an air quality complaint.

Grand Terrace and La Sierra High School Visit

On June 11, staff visited Grand Terrace High School in Grand Terrace and La Sierra High School in Riverside to provide information regarding the WHAM program, how to file an air quality complaint, the South Coast AQMD App, and wildfire safety information.

YMCA Orange County

On June 17, staff visited YMCA Orange County to provide information regarding the CAPES and WHAM programs, how to file an air quality complaint, the South Coast AQMD App, and wildfire safety information.

Speakers Bureau/Visitor Services

South Coast AQMD regularly receives requests for staff to speak on air quality-related issues from a wide variety of organizations, such as trade associations, chambers of commerce, community-based groups, schools, hospitals, and health-based organizations. South Coast AQMD also hosts visitors from around the world who meet with staff on a wide range of air quality issues.

League of Women Voters of Orange Coast

On May 7, staff provided the League of Women Voters of Orange Coast Climate Interest Group with an overview of the agency and a summary of PARs 1111 & 1121, including the Myth vs. Fact handout.

Chile Ministry of the Environment

On May 30, the Chile Ministry of the Environment visited South Coast AQMD to learn more about the Regional Clean Air Incentives Market (RECLAIM) Program and its offset system for local pollutants. The visit was part of a broader U.S. tour that included meetings with CARB and other environmental agencies.

Los Angeles County Department of Public Health

On June 27, representatives from the Los Angeles County Department of Public Health visited the South Coast AQMD to take a tour of the Lab.

Communication Center Statistics

The Communication Center handles calls on South Coast AQMD’s main line, 1-800-CUT-SMOG®, the Spanish line, and after-hours calls to those lines. Total calls received in the months of May and June are summarized below:

| | |
|---|-------|
| Calls to South Coast AQMD’s Main Line and 1-800-CUT-SMOG® | 3,909 |
| Calls to South Coast AQMD’s Spanish Line | 30 |
| Clean Air Connections | 7 |
| Total Calls | 3,946 |

Public Information Center Statistics

The Public Information Center (PIC) handles phone calls and assists individuals who walk in for general information. Email advisories provide information on upcoming meetings and events, program announcements and alerts on time-sensitive issues. Information for the months of May and June is summarized below:

| | |
|---------------------------|---------|
| Calls Received by PIC | 99 |
| Calls to Automated System | 199 |
| Total Calls | 298 |
| Visitor Transactions | 294 |
| Email Advisories Sent | 113,303 |

Small Business Assistance

South Coast AQMD notifies local businesses of proposed regulations so they can participate in the agency’s rule development process. South Coast AQMD works with other agencies and governments to identify efficient, cost-effective ways to reduce air pollution and shares that information broadly. Staff provided personalized assistance to small businesses over the telephone, at South Coast AQMD headquarters and via virtual on-site consultation, as summarized below for May and June.

- Provided permit application assistance to 405 companies, and
- Processed 235 Air Quality Permit Checklists.

Types of businesses assisted:

- | | | |
|--------------------|--------------------------|------------|
| Architecture Firms | Gas Stations | Schools |
| Auto Body Shops | Manufacturing Facilities | Warehouses |
| Construction Firms | Offices | |
| Dry Cleaners | Restaurants | |
| Engineering Firms | Retail Facilities | |

Media Relations

The Media Office handles all South Coast AQMD outreach and communications with television, radio, newspapers and all other publications, and media operations. The May and June report is listed below:

| | |
|--------------------------|-----|
| Major Media Interactions | 602 |
| Press Releases | 60 |
| News Carousel | 8 |

Major Media Topics:

- **LA Smog:** Staff participated in an interview with Spectrum Noticias for a segment on the State of the Air Report.
- **PARs 1111/1121:** Staff participated in an interview with LA Times, KCAL, and Politico to discuss the proposed rule. Inside Washington Post and CalMatters requested information on the proposed rules and followed up with additional questions. Floodlight had questions about the rules including board vote timing, rule impacts, rule delays and industry opposition. Voice of OC requested information on the rule and comments regarding recent actions by the Orange County Board of Supervisors. LA Times requested cost estimates comparing electric furnaces and water heaters to their gas counterparts. Canary Media requested information on the vote. Chino Valley Champion inquired about the Board's decision on the proposed rules and whether they will be brought back to the committee for consideration. California Environmental Insider inquired about the vote tally at the June 6th Board meeting. Responses for all inquiries were provided.
- **Summer Smog:** Staff participated in an interview with ABC7 regarding summer smog season and what people can do to protect themselves.
- **Clean Truck Policy:** Spectrum News requested an interview related to Congress voting to repeal California's clean truck policy and the ban on new gas-powered vehicles. Written response was provided.
- **Climate Change:** RAND Corporation requested a research interview regarding the equity in policy responses to climate change in the LA County region. Response was provided.
- **CA Waivers:** CalMatters requested information for a story on congressional efforts to revoke California's vehicle emissions waiver under the Congressional Review Act and how it could impact our emission reduction goals. Response was provided.
- **Air Quality:** ABC News requested an interview regarding the potential air quality benefits of the Salton Sea wetlands habitat project, specifically its impact on windblown dust. Response was provided.
- **Freight Rail Yards:** CalMatters requested a response for a story on railyard emissions, applicable rules, status of the rule, emissions data, violations and complaints. Response was provided.
- **State Implementation Plans (SIPs):** Inside Washington Publishers inquired about comments on SIP contingency measure plan. Response was provided.
- **Chiquita Canyon Landfill (CCL):** KTLA requested clarification and more information about any recent violation at CCL. The Signal inquired about the dates for the CCL hearing board meeting. Responses were provided.

- **Prescribed Burns:** Idyllwild Town Crier was looking for information on South Coast AQMD's role in permitting prescribed burns in Riverside County following the Governor's March 1 emergency proclamation. Response was provided.
- **Warehouse Indirect Source Rule (Rule 2305):** New York University journalism student had sent post-interview follow-up questions regarding Rule 2305. Response was provided. The Wall Street Journal was looking for the settlement amounts for recent violations issued at warehouses. Response was provided. Reporter followed up with an interview request which is scheduled for 6/4.
- **Wildfires:** New York Times requested information on air monitoring methods used during wildfires and air quality impacts to firefighters. San Francisco Chronicle requested information on beryllium detection following the LA wildfires. LA Times inquired about the complaints connected to the wildfire and/or debris cleanup for the past 6 months. Responses for all inquiries were provided. **Salton Sea Study:** Desert Sun and LA Times requested comment on a newly released study detailing hydrogen sulfide emissions and health risks at the Salton Sea. Responses were provided.
- **Aggregate Recycling Facilities:** LAist inquired about policies, monitoring and enforcement regarding aggregate recycling facilities and our response to SB 526 (Menjivar). Response was provided.
-
- **Air Monitoring Update Press Releases:** Pitched to media outlets.
- **Smog Season Press Release:** Pitched to media outlets.
- **Windblown Dust Advisories:** Pitched to media outlets resulting in media coverage.
- **CCL Violation Press Release:** Pitched to media outlets.
- **Smoke Advisory:** Pitched to media outlets resulting in media coverage.
- **Fireworks:** Staff participated in an interview with LAist and Los Angeles Times to discuss air quality impacts from fireworks.
-

News Releases:

- Press Release issued on Summer Smog Season is Starting. Informed the public of ozone pollution and advised precautions. To view, click [here](#).
- Press Release issued on Eaton and Palisades Air Monitoring Update. To view, click the following: [5/2](#), [5/9](#), [5/16](#), [5/23](#), and [5/30](#).
- Windblown Dust Advisory issued due to high winds in the Coachella Valley. To view, click the following: [5/11](#), [5/14](#), [5/16](#), [5/18](#), [5/22](#), [5/24](#), and [5/26](#).

- Press Release issued on Multiple Violations at CCL. To view, click the following: [5/30](#).
- Smoke Advisory issued due to the Henderson Fire in Temecula. Informed the public of smoke advisory. To view, click the following: [5/31](#).
- Press Release issued on Residents Can Trade in Old Gas-Powered Equipment at South Coast AQMDs Lawn and Garden Exchange. To view, click [here](#).
- Press Release issued on Eaton and Palisades Air Monitoring Update. To view, click the following: [6/5](#), [6/13](#) [6/20](#), and [6/26](#).
- Windblown Dust Advisory issued due to high winds in the Coachella Valley and Banning Pass. Informed the public of windblown dust due to high wind events. To view, click the following: [6/2](#), [6/15](#), [6/20](#), and [6/22](#).
- Smoke Advisory issued due to fires. To view, click the following: [6/29](#) and [6/30](#).
- Press Release issued on Chiquita Canyon Landfill Ordered to Take Stronger Actions to Reduce Odors. To view, click [here](#).

Social Media Posts:

[Residential Air Filtration Program \(5/7\)](#): 1,821 Twitter Impressions

--RT by @CountyofLA

[AQ Forecast \(5/12\)](#): 4,948 Twitter Impressions

--RT by @Go511, @CodeRed001Blue, @NWSLosAngeles

[AQ Forecast \(5/20\)](#): 5,131 Twitter Impressions

--RT by @Go511, @CodeRed001Blue, @NWSLosAngeles

[AQ Forecast \(5/28\)](#): 2,190 Twitter Impressions

--RT by @CodeRed001Blue, @NWSLosAngeles

[Henderson Fire Smoke Advisory \(5/31\)](#): 5,116 Twitter Impressions

--RT by @NWSSanDiego, @CodeRed001Blue

[AQ Forecast \(6/10\)](#): 4,867 Twitter Impressions

--RT by @CaliforniaEPA, @AirResources, @CodeRed001Blue, @NWSLosAngeles

[Windblown Dust Advisory \(6/15\)](#): 4,970 Twitter Impressions

--RT by @NWSSanDiego, @CodeRed001Blue

[AQ Forecast \(6/12\)](#): 4,762 Twitter Impressions

--RT by @CodeRed001Blue, @NWSLosAngeles

[Windblown Dust Advisory \(6/22\)](#): 5,164 Twitter Impressions
--RT by @NWSSanDiego, @AirResource, @CaliforniaEPA

News Carousel:

- **Stay informed! It's Air Quality Awareness Week, and today is World Asthma Day. Take a moment to "Stay Air Aware" (5/6)** - Linked to EPA's Air Quality Awareness webpage.
- **Attend public consultation meeting for Draft South Coast Ozone Contingency State Implementation Plan Revision on May 20 (5/14)** - Linked to the 2015 8-hour ozone standard webpage.
- **Apply now for Carl Moyer funding to replace older heavy-duty diesel engines and equipment—deadline is Jul. 1 (5/20)** - Linked to Carl Moyer Program webpage.
- **Attend public hearing on proposed rules for residential space and water heaters on Jun. 6. Written comments must be submitted by 5 p.m. on Jun. 3 (5/27)** - Linked to Notice of Public Hearing webpage.
- **Attend virtual Diesel Mobile Sources Workshop on Jun. 12 to learn about diesel emissions and efforts to improve air quality (6/10)** - Linked to Diesel Mobile Source workshop flyer.
- **Attend working group meeting on proposed rule 2304 commercial marine ports on Jun. 17 (6/12)** - Linked to Facility-based Mobile Source Measures webpage.
- **Attend Zero-Emissions Showcase + Ride & Drive event in Anaheim on Jun. 18. Registration is free but required for admission (6/17)** - Linked to event registration page.
- **Funding available - Apply now for Energy Infrastructure Incentives for Zero-Emission Commercial Vehicles. Deadline: July 15, 2025 (6/26)** - Linked to funding webpage

Outreach to Community Groups and Federal, State and Local Governments

Communication was conducted in May and June with elected officials and/or staff from the following state and federal offices:

- U.S. Senator Alex Padilla
- U.S. Senator Adam Schiff
- U.S. Representative Pete Aguilar
- U.S. Representative Nanette Barragán
- U.S. Representative Julia Brownley
- U.S. Representative Ken Calvert
- U.S. Representative Judy Chu
- U.S. Representative Gilbert R. Cisneros Jr.
- U.S. Representative Lou Correa
- U.S. Representative Laura Friedman
- U.S. Representative Robert Garcia
- U.S. Representative Jimmy Gomez
- U.S. Representative Sydney Kamlager-Dove
- U.S. Representative Young Kim

- U.S. Representative Ted Lieu
- U.S. Representative Dave Min
- U.S. Representative Jay Obernolte
- U.S. Representative Linda Sánchez
- U.S. Representative Brad Sherman
- U.S. Representative Mark Takano
- U.S. Representative Norma Torres
- U.S. Representative Derek Tran
- U.S. Representative Luz Rivas
- U.S. Representative Dr. Raul Ruiz
- U.S. Representative Maxine Waters
- U.S. Representative George Whitesides
- Senate President Pro Tempore Mike McGuire
- Senator Ben Allen
- Senator Bob Archuleta
- Senator Catherine Blakespear
- Senator Sabrina Cervantes
- Senator Steven Choi
- Senator Maria Elena Durazo
- Senator Lena Gonzalez
- Senator Shannon Grove
- Senator Caroline Menjivar
- Senator Rosilicie Ochoa Bogh
- Senator Steve Padilla
- Sasha Renée Pérez
- Senator Eloise Gómez Reyes
- Senator Laura Richardson
- Senator Susan Rubio
- Senator Kelly Seyarto
- Senator Lola Smallwood-Cuevas
- Senator Henry Stern
- Senator Tom Umberg
- Assembly Speaker Robert Rivas
- Assemblymember Steve Bennett
- Assemblymember Mia Bonta
- Assemblymember Isaac G. Bryan
- Assemblymember Lisa Calderon
- Assemblymember Jessica M. Caloza
- Assemblymember Juan Carrillo
- Assemblymember Leticia Castillo
- Assemblymember Phillip Chen
- Assemblymember Laurie Davies
- Assemblymember Diane B. Dixon
- Assemblymember Sade Elhawary
- Assemblymember Stan Ellis
- Assemblymember Mike Fong
- Assemblymember Jesse Gabriel
- Assemblymember Robert Garcia
- Assemblymember Mike Gipson
- Assemblymember Jeff Gonzalez
- Assemblymember Mark González
- Assemblymember John Harabedian
- Assemblymember Jacqui Irwin
- Assemblymember Dr. Cory A. Jackson
- Assemblymember Ash Kalra
- Assemblymember Tom Lackey
- Assemblymember Josh Lowenthal
- Assemblymember Tina McKinnor
- Assemblymember Al Muratsuchi
- Assemblymember Blanca Pacheco
- Assemblymember Gail Pellerin
- Assemblymember Cottie Petrie-Norris
- Assemblymember Sharon Quirk-Silva
- Assemblymember James C. Ramos
- Assemblymember Celeste Rodriguez
- Assemblymember Michelle Rodriguez
- Assemblymember Blanca E. Rubio
- Assemblymember Kate Sanchez
- Assemblymember Pilar Schiavo
- Assemblymember Nick Schultz
- Assemblymember José Luis Solache, Jr.
- Assemblymember Tri Ta
- Assemblymember Avelino Valencia
- Assemblymember Greg Wallis
- Assemblymember Rick Chavez Zbur

Outreach was conducted personally and virtually in May and June to communicate with elected officials or staff from the following cities:

| | | |
|------------------|----------------------|----------------------|
| Agoura Hills | Dana Point | Laguna Niguel |
| Alhambra | Desert Hot Springs | Laguna Woods |
| Aliso Viejo | Diamond Bar | Lake Elsinore |
| Anaheim | Downey | Lake Forest |
| Arcadia | Duarte | Lakewood |
| Artesia | Eastvale | Lawndale |
| Avalon | El Monte | Loma Linda |
| Azusa | El Segundo | Lomita |
| Baldwin Park | Fontana | Long Beach |
| Banning | Fountain Valley | Los Alamitos |
| Beaumont | Fullerton | Los Angeles |
| Bell | Garden Grove | Lynwood |
| Bell Gardens | Gardena | Malibu |
| Bellflower | Glendale | Manhattan Beach |
| Beverly Hills | Glendora | Maywood |
| Big Bear Lake | Grand Terrace | Menifee |
| Bradbury | Hawaiian Gardens | Mission Viejo |
| Brea | Hawthorne | Monrovia |
| Buena Park | Hemet | Montclair |
| Burbank | Hermosa Beach | Montebello |
| Calabasas | Hidden Hills | Monterey Park |
| Calimesa | Highland | Moreno Valley |
| Canyon Lake | Huntington Beach | Murrieta |
| Carson | Huntington Park | Newport Beach |
| Cathedral City | Indian Wells | Norco |
| Cerritos | Indio | Norwalk |
| Chino | Inglewood | Ontario |
| Chino Hills | Irvine | Orange |
| City of Industry | Irwindale | Palm Desert |
| Claremont | Jurupa Valley | Palm Springs |
| Coachella | La Cañada Flintridge | Palos Verdes Estates |
| Colton | La Habra | Paramount |
| Commerce | La Habra Heights | Pasadena |
| Compton | La Mirada | Perris |
| Corona | La Palma | Pico Rivera |
| Costa Mesa | La Puente | Placentia |
| Covina | La Quinta | Pomona |
| Cudahy | La Verne | Rancho Cucamonga |
| Culver City | Laguna Beach | Rancho Mirage |
| Cypress | Laguna Hills | Rancho Palos Verdes |

| | | |
|------------------------|------------------|------------------|
| Rancho Santa Margarita | San Marino | Tustin |
| Redlands | Santa Ana | Upland |
| Redondo Beach | Santa Clarita | Vernon |
| Rialto | Santa Fe Springs | Villa Park |
| Riverside | Santa Monica | Walnut |
| Rolling Hills | Seal Beach | West Covina |
| Rolling Hills Estates | Sierra Madre | West Hollywood |
| Rosemead | Signal Hill | Westlake Village |
| San Bernardino | South El Monte | Westminster |
| San Clemente | South Gate | Whittier |
| San Dimas | South Pasadena | Wildomar |
| San Fernando | Stanton | Yorba Linda |
| San Gabriel | Temecula | Yucaipa |
| San Jacinto | Temple City | |
| San Juan Capistrano | Torrance | |

Staff represented South Coast AQMD in May and June and/or provided updates or a presentation to the following governmental agencies and business organizations:

Anaheim Chamber of Commerce
 Artesia Chamber of Commerce
 Asian Business Association of Orange County
 Association of California Cities – Orange County
 Banning Chamber of Commerce
 Beach Cities Health District
 Bear Valley Electric Service, Inc.
 Beaumont Chamber of Commerce
 Bellflower Chamber of Commerce
 Big Bear Area Regional Wastewater Agency
 Big Bear Chamber of Commerce
 Blue Shield of California
 Building Industry Association of Southern California
 California Department of Forestry and Fire Protection
 CALSTART
 CARB
 Carson Chamber of Commerce
 Chino Valley Chamber of Commerce
 Coachella Valley Association of Governments
 Colton Chamber of Commerce
 Costa Mesa Chamber of Commerce
 County of Los Angeles
 County of San Bernardino

Crestline Chamber of Commerce
Crestline Sanitation District
Downey Chamber of Commerce
El Segundo Chamber of Commerce
Fontana Chamber of Commerce
Foothill Transit
Gardena Valley Chamber of Commerce
Gold Line Foothill Extension Construction Authority
Grand Terrace Area Chamber of Commerce
Greater Irvine Chamber of Commerce
Greater Lakewood Chamber of Commerce
Greater Ontario Business Council
Greater Riverside Chambers of Commerce
Harbor Association of Industry and Commerce
Hermosa Beach Chamber of Commerce
Highland Area Chamber of Commerce
Inglewood Airport Area Chamber of Commerce
Inland Empire Fire Safe Alliance
Inland Empire Regional Chamber of Commerce
Inland Empire Resource Conservation District
Inland Empire Utilities Agency
Inland Valley Development Agency
La Habra Area Chamber of Commerce
Lake Arrowhead Communities Chamber of Commerce
League of California Cities
Loma Linda Chamber of Commerce
Lomita Chamber of Commerce
Los Angeles Area Chamber of Commerce
Los Angeles County Metropolitan Transportation Authority
Los Angeles County Sanitation Districts
Los Angeles World Airports
Manhattan Beach Chamber of Commerce
March Air Reserve Base
Menifee Valley Chamber of Commerce
Metropolitan Water District of Southern California
Mountain Transit
Omnitrans
Ontario Area Chamber of Commerce
Ontario International Airport Authority
Orange County Council of Governments
Orange County Power Authority
Orange County Transportation Authority
Palos Verdes Peninsula Chamber of Commerce

Paramount Chamber of Commerce
Rancho Cucamonga Chamber of Commerce
Redlands Chamber of Commerce
Redondo Beach Chamber of Commerce
Rialto Chamber of Commerce
Riverside County Transportation Commission
Riverside Public Utilities
Riverside Transit Agency
Running Springs Area Chamber of Commerce
San Bernardino Area Chamber of Commerce
San Bernardino County Fire Protection District
San Bernardino County Transportation Authority
San Bernardino International Airport Authority
San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy
San Gabriel Valley Council of Governments
San Gabriel Valley Economic Partnership
San Gabriel Valley Mosquito & Vector Control District
Santa Ana Chamber of Commerce
Santa Fe Springs Chamber of Commerce
SCAG
Sierra Madre Chamber of Commerce
South Bay Association of Chambers of Commerce
South Bay Workforce Investment Board
South Pasadena Chamber of Commerce
Sun Valley Neighborhood Council
Torrance Area Chamber of Commerce
U.S. Chamber of Commerce
U.S. Fire Administration
Upland Chamber of Commerce
Upper San Gabriel Valley Municipal Water District
Valley Industry and Commerce Association
Western Riverside Council of Governments
Whittier Area Chamber of Commerce
Yucaipa Valley Chamber of Commerce

In May and June, staff represented South Coast AQMD and/or provided updates or a presentation to the following community and educational groups and organizations:

Arminta Street Elementary, North Hollywood
Bear Valley Unified School District
California State University, Fullerton
Casey Elementary School, Rialto
Chaffey College

City of Hope
Coachella Valley Unified School District
Coalition for Clean Air
Collegiate Charter High School, Los Angeles
Colton Woman's Club
Curtis R. Trucker Health Center
Delhi Center
Discovery Cube Los Angeles
Environmental Charter Middle School - Inglewood
Fernangeles Elementary, Sun Valley
Ganesha High School, Pomona
Girl Scout Troop 65510
Grades of Green
Grand Terrace High School, Grand Terrace
Kaiser Permanente
La Cañada Flintridge Tournament of Roses Association
La Sierra High School, Riverside
Los Angeles Unified School District
Middle College High School, Santa Ana
Move LA
Mt. Gleason Middle School, Sunland
Mt. San Antonio College
Options for Learning
Parkside Elementary School, San Bernardino
Redlands Unified School District
Roscoe Elementary, Sun Valley
San Bernardino City Unified School District
San Bernardino Valley College
San Gabriel Valley Habitat for Humanity
Schurr High School, Montebello
Serrano Elementary School, Villa Park
St. Mary's Academy, Inglewood
Sugar Hill Elementary School, Moreno Valley
Sustain OC Foundation
U.S. Green Building Council, Inland Empire Chapter

[↑ Back to Agenda](#)

BOARD MEETING DATE: August 1, 2025

AGENDA NO. 9

REPORT: Hearing Board Report

SYNOPSIS: This reports the actions taken by the Hearing Board during the period of May 1 through June 30, 2025.

COMMITTEE: No Committee Review

RECOMMENDED ACTION:
Receive and file.

Micah Ali
Hearing Board Chair

ft

Attached are the following summaries: **May 2025 and June 2025 Hearing Board Cases, and Rules From Which Variances and Orders for Abatement Were Requested from January 1, 2025 through June 30, 2025.** The applicable South Coast AQMD Rules for May and June 2025 are also attached.

There were no appeals filed during the period of May 1, 2025 to June 30, 2025.

Report of May 2025 Hearing Board Cases

| Case Name and Case No. (South Coast AQMD Attorney) | Rules | Reason for Petition/Hearing | South Coast AQMD Position/Hearing Board Action | Type and Length of Variance or Order | Excess Emissions |
|--|--------|---|--|--|---|
| 1. Los Angeles Regional Interoperable Communications System Joint Powers Authority (LA-RICS) Loop Canyon Facility Case No. 6234-6 (N. Dwyer) | 203(b) | SCE implemented PSPS events across several counties in Southern California. Petitioner approached the 200-hours per calendar year limit of their permits and needs to use their emergency generators. | Not Opposed/Granted | Ex Parte granted commencing 05/02/2025 and continuing for 30 days or until the IV Hearing, which is scheduled for 05/27/2025, whichever comes first. | CO: 14 lbs./day HC: 2.37 lbs./day NOx: 29.47 lbs./day PM: 2.47 lbs./day |
| 2. Los Angeles Regional Interoperable Communications System Joint Powers Authority (LA-RICS) Loop Canyon Facility Case No. 6234-6 (Consent Calendar) | 203(b) | SCE implemented PSPS events across several counties in Southern California. Petitioner approached the 200-hours per calendar year limit of their permits and needs to use their emergency generators. | Not Opposed/Granted | IV granted commencing 05/27/2025 and continuing for 90 days (inclusive of ex parte granted on 05/02/2025) or until the RV Hearing which is scheduled for 7/30/2025, whichever comes first. | CO: 14 lbs./day HC: 2.37 lbs./day NOx: 29.47 lbs./day PM: 2.47 lbs./day |
| 3. Los Angeles Regional Interoperable Communications System Joint Powers Authority (LA-RICS) Magic Mountain Link Case No. 6234-7 (K. Manwaring) | 203(b) | SCE implemented PSPS events across several counties in Southern California. Petitioner approached the 200-hours per calendar year limit of their permits and needs to use their emergency generators. | Not Opposed/Granted | Ex Parte granted commencing on 05/07/2025 and continuing for 30 days or until the IV Hearing which is scheduled for 05/27/2025, whichever comes first. | CO: 23.80 lbs./day HC: 1.37 lbs./day NOx: 26.09 lbs./day PM: 1.37 lbs./day |

| Case Name and Case No. (South Coast AQMD Attorney) | Rules | Reason for Petition/Hearing | South Coast AQMD Position/Hearing Board Action | Type and Length of Variance or Order | Excess Emissions |
|---|--|--|--|--|---|
| 4. Los Angeles Regional Interoperable Communications System Joint Powers Authority (LA-RICS) Magic Mountain Link Case No. 6234-7 (Consent Calendar) | 203(b) | SCE implemented PSPS events across several counties in Southern California. Petitioner approached the 200-hours per calendar year limit of their permits and needs to use their emergency generators. | Not Opposed/Granted | IV granted commencing 05/27/2025 and continuing for 90 days (inclusive of ex parte granted on 05/07/2025) or until the RV Hearing which is scheduled for 7/30/2025, whichever comes first. | CO: 23.80 lbs./day HC: 1.37 lbs./day NOx: 26.09 lbs./day PM: 1.37 lbs./day |
| 5. South Coast AQMD vs. Quaker City Plating & Silversmith Ltd. Case No. 5348-2 (J. Lee) | 202 1469(h)(3) 1469(h)(4)(A)(iv) 1469(k)(6) | Air pollution control system does not consist of ULPA filters and Respondent has not demonstrated compliance with permit source testing requirements and emissions limits for Tank HTL-POP-1 and Tank HTL-39, as well as the air pollution control system. | Stipulated/Issued | O/A issued commencing 05/14/2025. The Hearing Board shall retain jurisdiction over this matter until 01/30/2026. | N/A |

| Case Name and Case No. (South Coast AQMD Attorney) | Rules | Reason for Petition/Hearing | South Coast AQMD Position/Hearing Board Action | Type and Length of Variance or Order | Excess Emissions |
|--|---|--|--|--|---------------------------|
| 6. South Coast AQMD vs. Southern California Edison – Pebbly Beach Generating Station Case No. 1262-115 (Consent Calendar) | 1470(c)(4)(A) | Stipulated Modified Order for Abatement was sought to assure that operation of the equipment is done in a manner that will minimize and mitigate excess emissions and bring the facility into compliance as expeditiously as practicable. | Stipulated/Issued | Status report given: Stipulated Mod. O/A issued commencing on 05/27/2025. The Hearing Board shall retrain jurisdiction over this matter until 09/30/2026. | N/A |
| 7. Southern California Gas Company Case No. 137-82 (Consent Calendar) | 203(b) 1100(d)(3) 1110.2(e)(10) 2004(f)(1) 3002(c)(1) | This RECLAIM facility's three (3) compressor gas lean-burn ICEs must comply with the 11 ppm NOx emission limit in Rule 1110.2. | Not Opposed/Granted | RV granted commencing on 5/18/2025 and continuing through 2/28/2026. | NOx: TBD by 03/31/2026 |

Acronyms

CO: Carbon Monoxide
 HC: Hydrocarbons
 IV: Interim Variance
 Mod. O/A: Modified Order for Abatement
 N/A: Not Applicable
 NOx: Oxides of Nitrogen
 PM: Particulate Matter
 PSPS: Public Safety Power Shutoff
 RV: Regular Variance
 SCE: Southern California Edison
 TBD: To Be Determined

Report of June 2025 Hearing Board Cases

| Case Name and Case No. (South Coast AQMD Attorney) | Rules | Reason for Petition/Hearing | South Coast AQMD Position/Hearing Board Action | Type and Length of Variance or Order | Excess Emissions |
|--|--|--|--|---|------------------|
| 1. South Coast AQMD vs. Baker Commodities, Inc. Case No. 6223-1 (N. Dwyer, Hsu, D.) | 415(f) 415(g) 2004(f)(1) 3002(c)(1) | Third Modified Order to allow Baker to continue operating at the Facility, a collection center for the receipt and short-term storage of raw rendering material within a Permanent Total Enclosure before transportation of the material offsite to a licensed rendering or processing facility. | Stipulated/Issued | Status report given; Third Stipulated Mod. O/A issued commencing 06/18/2025. Pursuant to Conditions 15 & 16, the O/A shall automatically terminate upon Respondent's notification of final compliance to the Hearing Board. | N/A |
| 2. South Coast AQMD vs. Chiquita Canyon, LLC Case No. 6177-4 (K. Roberts, R. Mansell, M. Reichert) | 203 402 431.1 1150 3002 H & S Code §41700 | Modified Stipulated Order to mitigate conditions that could contribute to potential odors and potential nuisances. | Stipulated/Issued | Status report given; Stipulated Mod. O/A issued commencing 6/24/2025. The Hearing Board shall retain jurisdiction over this matter until 10/31/25. | N/A |

| Case Name and Case No. (South Coast AQMD Attorney) | Rules | Reason for Petition/Hearing | South Coast AQMD Position/Hearing Board Action | Type and Length of Variance or Order | Excess Emissions |
|--|--------|--|--|---|----------------------|
| 3. Vons Company Inc. #6765 Case No. 6271-1 (S. Pruitt) | 203(b) | Vons operates permitted baking equipment that vents to an air pollution control system, including an RTO, which suffered a breakdown at the Vons Facility. The incident was due to an unplanned and non-preventable mechanical failure during a production run. South Coast AQMD was notified within an hour of the breakdown. | Not Opposed/Granted | Ex Parte Variance granted commencing on 6/6/2025 and continuing for 30 days or until final compliance is achieved, whichever comes first. | VOC: 522.08 lbs./day |

Acronyms

H&S Code: Health & Safety Code
 Mod. O/A: Modified Order for Abatement
 N/A: Not Applicable
 RTO: Regenerative Thermal Oxidizer
 VOC: Volatile Organic Compounds

Rules from which Variances and Orders for Abatement were Requested in 2025

| Rules | Jan | Feb | Mar | April | May | June | July | Aug | Sept | Oct | Nov | Dec | Total Actions |
|-------------------|-----|-----|-----|-------|-----|------|------|-----|------|-----|-----|-----|---------------|
| 201 | | 1 | | | | | | | | | | | 1 |
| 202 | | | | | | 1 | | | | | | | 1 |
| 203 | | | | 1 | | 1 | | | | | | | 2 |
| 203(a) | | 1 | | | | | | | | | | | 1 |
| 203(b) | 4 | 5 | 5 | 6 | 5 | 1 | | | | | | | 26 |
| 402 | | | 2 | 1 | | 1 | | | | | | | 4 |
| 415 | | 1 | | | | | | | | | | | 1 |
| 415(f) | | | | | | 1 | | | | | | | 1 |
| 415(g) | | | | | | 1 | | | | | | | 1 |
| 431.1 | | | | 1 | | 1 | | | | | | | 2 |
| 461(c)(2)(B) | | | 1 | | | | | | | | | | 1 |
| 463(d)(3) | | | | 1 | | | | | | | | | 1 |
| 1100(d)(3) | | | | | 1 | | | | | | | | 1 |
| 1110.2(e)(10) | | | | | 1 | | | | | | | | 1 |
| 1128 | | | 1 | | | | | | | | | | 1 |
| 1134 | 1 | | | | | | | | | | | | 1 |
| 1134(d)(3) | 1 | | | | | | | | | | | | 1 |
| 1147 | | | 1 | | | | | | | | | | 1 |
| 1148.1(d)(8) | | | | 2 | | | | | | | | | 2 |
| 1150 | | | | 1 | | 1 | | | | | | | 2 |
| 1173(m)(1) | | | | 2 | | | | | | | | | 2 |
| 1426 | | 1 | | | | | | | | | | | 1 |
| 1469 | | 1 | | | | | | | | | | | 1 |
| 1469(h)(3) | | | | | 1 | | | | | | | | 1 |
| 1469(h)(4)(A)(iv) | | | | | 1 | | | | | | | | 1 |
| 1469(k)(6) | | | | | 1 | | | | | | | | 1 |
| 1470(c)(4)(A) | | | | | 1 | | | | | | | | 1 |
| 2004(f) | 1 | | | | | | | | | | | | 1 |
| 2004(f)(1) | | | 1 | 2 | 1 | 1 | | | | | | | 5 |
| 3002 | | | | 1 | | 1 | | | | | | | 2 |
| 3002(c)(1) | 3 | | 2 | 2 | 1 | 1 | | | | | | | 9 |
| CA H&S §41700 | | | 2 | 1 | | 1 | | | | | | | 4 |

**SOUTH COAST AQMD RULES AND REGULATIONS INDEX
FOR 2025 HEARING BOARD CASES AS OF JUNE 30, 2025**

REGULATION II – PERMITS

- Rule 201 Permit to Construct
- Rule 202 Temporary Permit to Operate
- Rule 203 Permit to Operate

REGULATION IV - PROHIBITIONS

- Rule 402 Nuisance
- Rule 415 Odors from Rendering Facilities
- Rule 431.1 Sulfur Content of Gaseous Fuels
- Rule 461 Gasoline Transfer and Dispensing
- Rule 463 Organic Liquid Storage

REGULATION XI – SOURCE SPECIFIC STANDARDS

- Rule 1100 Implementation Schedule for NO_x Facilities
- Rule 1110.2 Emissions for Gaseous – and Liquid-Fueled Engines
- Rule 1128 Paper, Fabric, and Film Coating Operations
- Rule 1134 Emissions of Oxides of Nitrogen from Stationary Gas Turbines
- Rule 1147 NO_x Reductions from Miscellaneous Sources
- Rule 1148.1 Oil and Gas Production Wells
- Rule 1150 Excavation of Landfill Sites
- Rule 1173 Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants

REGULATION XIV - TOXICS AND OTHER NON-CRITERIA POLLUTANTS

Rule 1426 Emissions from Metal Finishing Operations

Rule 1469 Hexavalent Chromium Emissions from Chromium Electroplating and Chromic Acid Anodizing Operations

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

REGULATION XX – REGIONAL CLEAN AIR INCENTIVES MARKET (RECLAIM)

Rule 2004 Requirements

REGULATION XXX – TITLE V PERMITS

Rule 3002 Requirements

CALIFORNIA HEALTH & SAFETY CODE

§41700 Prohibited Discharges

[↑ Back to Agenda](#)

BOARD MEETING DATE: August 1, 2025

AGENDA NO. 10

REPORT: Civil Filings and Civil Penalties Report

SYNOPSIS: This report summarizes monthly penalties and legal actions filed by the General Counsel’s Office from May 1 through May 31, 2025. An Index of South Coast AQMD Rules is attached with the penalty report.

COMMITTEE: Stationary Source, June 20, 2025, Reviewed

RECOMMENDED ACTION:
Receive and file.

Bayron T. Gilchrist
General Counsel

BTG:cr

| | CIVIL FILINGS | VIOLATIONS |
|-----------|---|---------------------|
| 1. | JCH Logistics, Inc. County of Los Angeles Superior Court – Small Claims Case No.: 25LBSC00561; Filed 5.21.25 (CL) NOV No.: P76267 California Code of Regulations Title 13 § 2485 – Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling California Health and Safety Code § 42402 | 1 |
| | | 1 Violations |

Attachments

May 2025 Penalty Report

Index of South Coast AQMD Rules and Regulations

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
General Counsel's Office**

Settlement Penalty Report (05/01/2025 - 05/31/2025)

Total Penalties

Civil Settlement: \$386,738.00
Hearing Board Settlement: \$1,000.00
MSPAP Settlement: \$157,627.00

Total Cash Settlements: \$545,365.00

Total SEP Value: \$0.00

Fiscal Year through 05/31/2025 Cash Total: \$8,411,650.67

Fiscal Year through 05/31/2025 SEP Value Only Total: \$0.00

| Fac ID | Company Name | Rule Number | Settled Date | Init | Notice Nbrs | Total Settlement |
|--------------|---|--|--------------|------|---|------------------|
| Civil | | | | | | |
| 201719 | APPLIED INDUSTRIAL TECHNOLOGIES | 2305 | 05/22/2025 | RM | O15180 | \$5,000.00 |
| 197024 | CENTRAL GARDEN & PET | 2305 | 05/01/2025 | SP | O15292 | \$15,840.00 |
| 151194 | D H L GLOBAL FORWARDING | 2305 | 05/20/2025 | RM | O15210 | \$28,600.00 |
| 202570 | DEALER TIRE | 2305 | 05/13/2025 | RM | O15185 | \$5,000.00 |
| 201012 | DENSO | 2305 | 05/21/2025 | RM | O15149 | \$4,000.00 |
| 202593 | DHL | 2305 | 05/13/2025 | RM | O15213 | \$28,600.00 |
| 124570 | FISHERMAN'S PRIDE PROCESS - NEPTUNE FOODS | 2305 | 05/06/2025 | JL | O15162 | \$750.00 |
| 53574 | GARDNER GIBSON | 1113 | 05/06/2025 | EC | P65664 | \$5,300.00 |
| 164610 | GENERAL FINISHES | 1113 | 05/02/2025 | RM | P65665 | \$29,400.00 |
| 203932 | GIGACLOUD TECHNOLOGY INC (USA) | 2305 | 05/23/2025 | SP | O15295 | \$8,000.00 |
| 201716 | GLOBAL ONE LOGISTICS | 2305 | 05/02/2025 | RM | O15100 | \$28,600.00 |
| 189538 | HEMPEL INC (USA) | 1113 | 05/13/2025 | JL | P65667 | \$14,500.00 |
| 124808 | INEOS POLYPROPYLENE LLC | 401, 1173, 2004, 2011, APPENDIX A (2011), 2012, APPENDIX A (2012), 3002, 40 CFR 60.18 | 05/06/2025 | KER | P63847, P68954, P68959, P68963, P68977, P68978, P68984, P68985, P68994, P73513, P73516, P75009, P78807, P79478 | \$87,709.00 |

| Fac ID | Company Name | Rule Number | Settled Date | Init | Notice Nbrs | Total Settlement |
|--------|-----------------------------------|---------------------|--------------|------|------------------------|------------------|
| 181188 | JJ & S ASBESTOS REMOVAL INC | 1403 | 05/13/2025 | ND | P74717 | \$1,249.00 |
| 202581 | LYZZ | 2305 | 05/06/2025 | ND | O15136 | \$13,000.00 |
| 193643 | MAC DAD BUILDERS INC | 1403, 40 CFR 61.145 | 05/06/2025 | DH | P80310 | \$1,500.00 |
| 203039 | MAPEI CORPORATION | 1168 | 05/14/2025 | JL | P74932 | \$31,200.00 |
| 201726 | MULTIQUIP | 2305 | 05/14/2025 | ND | O15126 | \$5,000.00 |
| 202561 | PETCO ANIMAL SUPPLIES STORES INC | 2305 | 05/07/2025 | ND | O15169, O15251, O15437 | \$39,000.00 |
| 203780 | RAZOR USA LLC | 2305 | 05/20/2025 | SP | O15282 | \$15,840.00 |
| 180410 | REICHHOLD LLC 2 | 1147 | 05/09/2025 | RM | P73172 | \$6,250.00 |
| 200142 | SOUTHWEST LANDSCAPE & MAINTENANCE | 403, 403.1 | 05/06/2025 | RM | P75247 | \$2,000.00 |
| 203218 | WALTERS WHOLESALE ELECTRIC CO | 2305 | 05/20/2025 | SP | O15233 | \$10,400.00 |

Total Civil Settlements: \$386,738.00

| Hearing Board | | | | | | |
|---------------|--------------------------|-----------------|------------|-----|--------|------------|
| 146536 | WALNUT CREEK ENERGY, LLC | 203, 2004, 3002 | 05/06/2025 | KCM | 6230-6 | \$1,000.00 |

Total Hearing Board Settlements: \$1,000.00

| MSPAP | | | | | | |
|--------|---|------------------|------------|----|--------|------------|
| 79776 | 2000 C STORE INC | 461, H&S 41960.2 | 05/06/2025 | VB | P73531 | \$4,945.00 |
| 168037 | 7 ELEVEN INC (#33552) | 201 | 05/23/2025 | VB | P80974 | \$1,049.00 |
| 129216 | ALLEN INDUSTRIAL & MACHINE | 203, 1469 | 05/16/2025 | CL | P80320 | \$8,118.00 |
| 190518 | AMERICAN PLUS INC | 1403 | 05/16/2025 | CM | P81151 | \$2,872.00 |
| 155225 | AMERICAN ROYAL PETROLEUM INC | 203, 461 | 05/16/2025 | CM | P80243 | \$1,573.00 |
| 174623 | ARCO (#42039) | 461, H&S 41960.2 | 05/13/2025 | SW | P73544 | \$1,428.00 |
| 169428 | B & F METAL FINISHING | 203, 1107 | 05/02/2025 | CL | P81509 | \$5,620.00 |
| 206933 | C.W. DRIVER | 403 | 05/16/2025 | VB | P79979 | \$1,993.00 |
| 31367 | CALIFORNIA WATER SERVICE CO | 461 | 05/13/2025 | CM | P74896 | \$1,793.00 |
| 153969 | CARSON UNION 76 | 461, H&S 41960.2 | 05/13/2025 | SW | P73534 | \$1,678.00 |
| 118064 | CIRCLE K STORES INC (#489) | 461 | 05/16/2025 | CL | P80973 | \$1,149.00 |
| 96220 | CITY OF LA - DEPARTMENT OF RECREATION & PARKS | 203, 461 | 05/13/2025 | CM | P75914 | \$3,321.00 |
| 203351 | COAST ABATEMENT SERVICES INC | 1403 | 05/13/2025 | CM | P78643 | \$6,294.00 |
| 112684 | COASTLINE HIGH PERFORMANCE COATINGS LTD | 1402 | 05/02/2025 | CL | P73836 | \$2,198.00 |
| 172250 | CORONA FUELING & ELECTRIC INC | 1166 | 05/02/2025 | CL | P80648 | \$3,297.00 |
| 23043 | CALIFORNIA STATE UNIVERSITY - SAN BERNARDINO | 203 | 05/16/2025 | CL | P73924 | \$3,027.00 |
| 3721 | DART CONTAINER CORP OF CALIFORNIA | 2012 | 05/02/2025 | CL | P78920 | \$7,942.00 |
| 144430 | DOWNEY SHELL | 461, H&S 41960.2 | 05/16/2025 | CM | P80211 | \$1,565.00 |
| 205810 | FOOD MART AND CHURCH'S CHICKEN | 201 | 05/23/2025 | CL | P80969 | \$1,049.00 |

| Fac ID | Company Name | Rule Number | Settled Date | Init | Notice Nbrs | Total Settlement |
|--|--|---------------------|--------------|------|-------------|------------------|
| 201806 | GIGACLOUD TECHNOLOGY INC - CALIFORNIA (#5) | 2305 | 05/02/2025 | CM | O15226 | \$8,360.00 |
| 142311 | GREENCYCLE | 203, 1133 | 05/02/2025 | CL | P79951 | \$2,198.00 |
| 138706 | HEALTHCARE REALTY SERVICES | 203 | 05/23/2025 | CM | P79860 | \$1,009.00 |
| 186552 | HIGHMEL INC (DBA "MELROSE MOBIL") | 461, H&S 41960.2 | 05/06/2025 | VB | P80911 | \$3,027.00 |
| 188793 | HUNTINGTON ORTHOPEDIC INSTITUTE LLC | 203 | 05/06/2025 | CL | P81651 | \$1,009.00 |
| 175942 | JONES COVEY GROUP INC | 1166 | 05/06/2025 | CL | P80626 | \$3,956.00 |
| 196041 | LA MASTERS COLLISION MOTORSPORTS INC | 203 | 05/23/2025 | CL | P73566 | \$744.00 |
| 174742 | LEE IN KU'S MOBIL | 461, H&S 41960.2 | 05/02/2025 | SW | P73520 | \$6,054.00 |
| 167925 | LEGENDS GOLF CLUB | 461 | 05/16/2025 | VB | P81353 | \$6,369.00 |
| 121612 | MILLION DOLLAR BODY SHOP INC | 203 | 05/13/2025 | CL | P68377 | \$2,000.00 |
| 205347 | NOHO COLLISION CENTER | 109, 203 | 05/06/2025 | VB | P79866 | \$1,813.00 |
| 183658 | PENA DEMOLITION | 1403, 40 CFR 61.145 | 05/06/2025 | VB | P78645 | \$1,186.00 |
| 15031 | SB COUNTY - EPWA COUNTY JAIL | 1146 | 05/23/2025 | CL | P74283 | \$2,772.00 |
| 10167 | SB COUNTY - FACILITIES MANAGEMENT DEPARTMENT | 203 | 05/23/2025 | CM | P74284 | \$2,098.00 |
| 204392 | SAN JACINTO VALLEY ACADEMY | 1403, 40 CFR 61.145 | 05/02/2025 | CL | P80318 | \$6,233.00 |
| 131850 | SHAW DIVERSIFIED SERVICES INC | 2004 | 05/23/2025 | CL | P75637 | \$4,669.00 |
| 112166 | SOUTH WEST OFFSET PRINTING CO INC | 1147 | 05/23/2025 | CM | P81510 | \$7,867.00 |
| 203058 | SSA PACIFIC INC | 2305 | 05/02/2025 | CL | O15153 | \$11,050.00 |
| 152122 | TERRIBLE HERBST INC (#285) | 461 | 05/06/2025 | VB | P79624 | \$4,945.00 |
| 138103 | TRANSCONTINENTAL ONTARIO INC | 3002 | 05/16/2025 | CL | P77955 | \$6,245.00 |
| 203678 | WE THE PEOPLE CONSTRUCTION INC | 1403 | 05/13/2025 | CL | P78128 | \$13,112.00 |
| Total MSPAP Settlements: \$157,627.00 | | | | | | |

**SOUTH COAST AQMD RULES AND REGULATIONS INDEX
FOR MAY 2025 PENALTY REPORT**

REGULATION I - GENERAL PROVISIONS

Rule 109 Recordkeeping for Volatile Organic Compound Emissions

REGULATION II - PERMITS

Rule 201 Permit to Construct

Rule 203 Permit to Operate

REGULATION IV - PROHIBITIONS

Rule 401 Visible Emissions

Rule 403 Fugitive Dust

Rule 403.1 Wind Entrainment of Fugitive Dust

Rule 461 Gasoline Transfer and Dispensing

REGULATION XI - SOURCE SPECIFIC STANDARDS

Rule 1107 Coating of Metal Parts and Products

Rule 1113 Architectural Coatings

Rule 1133 Composting and Related Operations – General Administrative Requirements

Rule 1146 Emissions of Oxides of Nitrogen from Industrial, Institutional and Commercial Boilers, Steam Generators, and Process Heaters

Rule 1147 NOx Reductions from Miscellaneous Sources

Rule 1166 Volatile Organic Compound Emissions from Decontamination of Soil

Rule 1168 Adhesive and Sealant Applications

Rule 1173 Fugitive Emissions of Volatile Organic Compounds

REGULATION XIV - TOXICS

Rule 1402 Control of Toxic Air Contaminants from Existing Sources

Rule 1403 Asbestos Emissions from Demolition/Renovation Activities

Rule 1469 Hexavalent Chromium Emissions from Chrome Plating and Chromic Acid Anodizing Operations

**SOUTH COAST AQMD RULES AND REGULATIONS INDEX
FOR MAY 2025 PENALTY REPORT**

REGULATION XX - REGIONAL CLEAN AIR INCENTIVES MARKET (RECLAIM)

- Rule 2004 Requirements
- Rule 2011 Requirements for Monitoring, Reporting, and Recordkeeping for Oxides of Sulfur (SOx) Emissions
- Appendix A - Rule 2011
Protocol for Monitoring, Reporting, and Recordkeeping for Oxides of Sulfur (SOx) Emissions
- Rule 2012 Requirements for Monitoring, Reporting, and Recordkeeping for Oxides of Nitrogen (NOx) Emissions
- Appendix A - Rule 2012
Protocol for Monitoring, Reporting, and Recordkeeping for Oxides of Nitrogen (NOx) Emissions

REGULATION XXIII - FACILITY BASED MOBILE SOURCE MEASURES

- Rule 2305 Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (Waive) Program

REGULATION XXX - TITLE V PERMITS

- Rule 3002 Requirements

CODE OF FEDERAL REGULATIONS

- 40 CFR 60.18 General control device and work practice requirements
- 40 CFR 61.145 Standards for Demolition and Renovation

CALIFORNIA HEALTH AND SAFETY CODE

- H&S § 41960.2 Gasoline Vapor Recovery
- H&S § 42402 Violation of Emission Limitations – Civil Penalty

CALIFORNIA CODE OF REGULATIONS

- 13 CCR 2485 Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

[↑ Back to Agenda](#)

BOARD MEETING DATE: August 1, 2025

AGENDA NO. 11

REPORT: Intergovernmental Review of Environmental Documents and CEQA Lead Agency Projects

SYNOPSIS: This report provides a listing of environmental documents prepared by other public agencies seeking review by South Coast AQMD between May 1, 2025 and June 30, 2025, and proposed projects for which South Coast AQMD is acting as lead agency pursuant to CEQA.

COMMITTEE: Mobile Source, June 20, 2025, Reviewed the May 1 to May 31, 2025 portion of the report; No Committee Review for the June 1 to June 30, 2025 portion of the report

RECOMMENDED ACTION:
Receive and file.

Wayne Nastri
Executive Officer

SR:MK:BR:SW:ET:DC

Background

The California Environmental Quality Act (CEQA) Statute and Guidelines require public agencies, when acting in their lead agency role, to provide an opportunity for other public agencies and members of the public to review and comment on the analysis in environmental documents prepared for proposed projects. A lead agency is when a public agency has the greatest responsibility for supervising or approving a proposed project and is responsible for the preparation of the appropriate CEQA document.

Each month, South Coast AQMD receives environmental documents, which include CEQA documents, for proposed projects that could adversely affect air quality. South Coast AQMD fulfills its intergovernmental review responsibilities, in a manner that is consistent with the Board's 1997 Environmental Justice Guiding Principles and

Environmental Justice Initiative #4, by reviewing and commenting on the adequacy of the air quality analysis in the environmental documents prepared by other lead agencies.

The status of these intergovernmental review activities is provided in this report in two sections: 1) Attachment A lists all of the environmental documents prepared by other public agencies seeking review by South Coast AQMD that were received during the reporting period; and 2) Attachment B lists the active projects for which South Coast AQMD has reviewed or is continuing to conduct a review of the environmental documents prepared by other public agencies. Further, as required by the Board's October 2002 Environmental Justice Program Enhancements for fiscal year (FY) 2002-03, each attachment includes notes for proposed projects which indicate when South Coast AQMD has been contacted regarding potential air quality-related environmental justice concerns. The attachments also identify for each proposed project, as applicable: 1) the dates of the public comment period and the public hearing date; 2) whether staff provided written comments to a lead agency and the location where the comment letter may be accessed on South Coast AQMD's website; and 3) whether staff testified at a hearing.

In addition, the South Coast AQMD will act as lead agency for a proposed project and prepare a CEQA document when: 1) air permits are needed; 2) potentially significant adverse impacts have been identified; and 3) the South Coast AQMD has primary discretionary authority over the approvals. Attachment C lists the proposed air permit projects for which South Coast AQMD is lead agency under CEQA.

Attachment A – Log of Environmental Documents Prepared by Other Public Agencies and Status of Review, and Attachment B – Log of Active Projects with Continued Review of Environmental Documents Prepared by Other Public Agencies

Attachment A contains a list of all environmental documents prepared by other public agencies seeking review by South Coast AQMD that were received pursuant to CEQA or other regulatory requirements. Attachment B provides a list of active projects, which were identified in previous months' reports, and which South Coast AQMD staff is continuing to evaluate or prepare comments relative to the environmental documents prepared by other public agencies. The following table provides statistics on the status of review¹ of environmental documents for the current reporting period for Attachments A and B combined²:

¹ The status of review reflects the date when this Board Letter was prepared. Therefore, Attachments A and B may not reflect the most recent updates.

² Copies of all comment letters sent to the lead agencies are available on South Coast AQMD's website at: <http://www.aqmd.gov/home/regulations/ceqa/commenting-agency>.

| Statistics for Reporting Period from May 1, 2025 to June 30, 2025 | |
|---|------------|
| Attachment A: Environmental Documents Prepared by Other Public Agencies and Status of Review | 146 |
| Attachment B: Active Projects with Continued Review of Environmental Documents Prepared by Other Public Agencies (which were previously identified in the April 2025 report) | 6 |
| Total Environmental Documents Listed in Attachments A & B | 152 |
| <i>Comment letters sent</i> | <i>19</i> |
| <i>Environmental documents reviewed, but no comments were made</i> | <i>121</i> |
| <i>Environmental documents currently undergoing review</i> | <i>12</i> |

Staff focuses on reviewing and preparing comments on environmental documents prepared by other public agencies for proposed projects: 1) where South Coast AQMD is a responsible agency under CEQA (e.g., when air permits are required but another public agency is lead agency); 2) that may have significant adverse regional air quality impacts (e.g., special event centers, landfills, goods movement); 3) that may have localized or toxic air quality impacts (e.g., warehouse and distribution centers); 4) where environmental justice concerns have been raised; and 5) which a lead or responsible agency has specifically requested South Coast AQMD review.

If staff provided written comments to a lead agency, then a hyperlink to the “South Coast AQMD Letter” is included in the “Project Description” column which corresponds to a notation in the “Comment Status” column. In addition, if staff testified at a hearing for a proposed project, then a notation is included in the “Comment Status” column. Copies of all comment letters sent to lead agencies are available on South Coast AQMD’s website at: <http://www.aqmd.gov/home/regulations/ceqa/commenting-agency>. Interested parties seeking information regarding the comment periods and scheduled public hearings for projects listed in Attachments A and B should contact the lead agencies for further details as these dates are occasionally modified.

In January 2006, the Board approved the Clean Port Initiative Workplan (Workplan). One action item of the Workplan was to prepare a monthly report describing CEQA documents for projects related to goods movement and to make full use of the process to ensure the air quality impacts of such projects are thoroughly mitigated. In accordance with this action item, Attachments A and B organize the environmental documents received according to the following categories: 1) goods movement projects; 2) schools; 3) landfills and wastewater projects; 4) airports; and 5) general land use projects. In response to the action item relative to mitigation, staff maintains a compilation of mitigation measures presented as a series of tables relative to off-road engines; on-road engines; harbor craft; ocean-going vessels; locomotives; fugitive dust; and greenhouse gases which are available on South Coast AQMD’s website at:

<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>. Staff will continue compiling tables of mitigation measures for other emission sources such as ground support equipment.

Attachment C – Proposed Air Permit Projects for Which South Coast AQMD is CEQA Lead Agency

The CEQA lead agency is responsible for determining the type of environmental document to be prepared if a proposal requiring discretionary action is considered to be a “project” as defined by CEQA. South Coast AQMD periodically acts as lead agency for its air permit projects and the type of environmental document prepared may vary depending on the potential impacts. For example, an Environmental Impact Report (EIR) is prepared when there is substantial evidence that the project may have significant adverse effects on the environment. Similarly, a Negative Declaration (ND) or Mitigated Negative Declaration (MND) may be prepared if a proposed project will not generate significant adverse environmental impacts, or the impacts can be mitigated to less than significance. The ND and MND are types of CEQA documents which analyze the potential environmental impacts and describe the reasons why a significant adverse effect on the environment will not occur such that the preparation of an EIR is not required.

Attachment C of this report summarizes the proposed air permit projects for which South Coast AQMD is lead agency and is currently preparing or has prepared environmental documentation pursuant to CEQA. As noted in Attachment C, South Coast AQMD is lead agency for four air permit projects during May and June 2025.

Attachments

- A. Environmental Documents Prepared by Other Public Agencies and Status of Review
- B. Active Projects with Continued Review of Environmental Documents Prepared by Other Public Agencies
- C. Proposed Air Permit Projects for Which South Coast AQMD is CEQA Lead Agency

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to June 30, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|---|---|--|----------------------|---|
| Warehouse & Distribution Centers ORC250506-07 DJT4 Parcel Delivery Facility Project (Amazon Parcel Delivery Facility Project) | The project consists of demolishing an existing 637,503 square foot office building, surface parking, and associated landscape areas and constructing a new industrial warehouse consisting of 181,500 square foot parcel delivery facility building. The 31.6-acre site is located at 275 Valencia Avenue in Brea. Staff previously provided comments on the Draft Environmental Impact Report, which can be accessed at: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2024/december-2024/orc241106-09-deir-djt4-parcel-delivery-facility-project.pdf . References: ORC241106-09 and ORC230719-13 Comment Period: N/A Public Hearing: 5/13/2025 | Other | City of Brea | Document reviewed - No comments sent |
| Warehouse & Distribution Centers RVC250501-05 PP2024-0052 | The project consists of amending Plot Plan No. 04-PP-18 to add a 457,444 square foot single-story warehouse building and associated improvements within the Rolling Hills Ranch Industrial Park Specific Plan (Crossroads Logistics Center). The project is located at 1022 Prosperity Way in Beaumont. Comment Period: N/A Public Hearing: N/A | Other | City of Beaumont | Document reviewed - No comments sent |
| Warehouse & Distribution Centers ORC250513-05 Harbinger Motors | The project consists of constructing a 10,338 square foot mezzanine to provide additional office space within an existing 173,000 square foot (gross floor area) warehouse. The project is located at 12821 Knott Street in Garden Grove. https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2025/may-2025/orc250513-05.pdf Comment Period: 5/13/2025 - 6/2/2025 Public Hearing: 6/3/2025 | Initial Study/Draft Negative Declaration | City of Garden Grove | Comment letter sent on 5/28/2025 |

Key:

= Project has potential environmental justice concerns due to the nature and/or location of the project.

LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP =

Project located outside of South Coast AQMD jurisdiction

Project Notes:

1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to June 30, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|---|---|---|--------------------------------|---|
| Industrial and Commercial RVC250527-02 The Barker Business Park | The project consists of constructing a 25,750-square-foot building on five acres and a 14,139-square-foot building on 10 acres and designating 9.6 acres for the sale and rental of commercial trailers – all on a site totaling 25.6 gross acres which is comprised of two vacant parcels bisected by East Frontage Road. The project is located northeast of Interstate 215 and Placentia Avenue interchange, between Walnut Avenue to the north and Placentia Avenue to the south in Perris. Staff previously provided comments on the Draft Mitigated Negative Declaration, which can be accessed at: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2025/april-2025/rvc250319-01.pdf . References: RVC250319-01; RVC200825-01; RVC200611-28; and RVC190924-01 Comment Period: N/A Public Hearing: 6/4/2025 | Other | City of Perris | Document reviewed - No comments sent |
| Industrial and Commercial SBC250502-10 El Camino Project | The project consists of expanding a beverage distribution facility on a three-acre site by: 1) constructing up to 1,054,541 square feet of new manufacturing, light industrial, office uses, a four-story parking structure, a solar energy and battery storage system, and a cogeneration system during two phases of construction on the northern and southern portions of the site; and 2) demolishing a 62,210 square foot warehouse on the northern portion. The project is comprised of eight contiguous assessor parcels and bounded by 7th Street to the north, Utica Avenue to the east, 6th Street to the south, and Haven Avenue to the west. The project is located in the southern area of Rancho Cucamonga. Staff previously provided comments on the Notice of Preparation of a Draft Environmental Impact Report, which can be accessed at: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/october-2023/SBC230920-09.pdf . References: SBC230823-10 and SBC230920-09 https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2025/june-2025/sbc250502-10.pdf Comment Period: 4/29/2025 - 6/13/2025 Public Hearing: N/A | Draft Environmental Impact Report | City of Rancho Cucamonga | Comment letter sent on 6/13/2025 |

Key:

= Project has potential environmental justice concerns due to the nature and/or location of the project.

LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP =

Project located outside of South Coast AQMD jurisdiction

Project Notes:

1. Disposition may change prior to Governing Board Meeting

2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to June 30, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|---|--|------------------------------|--|--------------------------------------|
| <i>Waste and Water-related</i> LAC250501-03 Pure Water Southern California# | <p>The project consists of constructing a regional water recycling facility that would produce high quality water to refill underground reservoirs for use in the event of an earthquake or other emergency that disrupts imported water supplies. The project is located at 24501 South Figueroa Street on the northwest corner of South Figueroa Street and West Lomita Boulevard in Carson and encompasses unincorporated areas of Los Angeles, Orange, and San Bernardino counties in the designated AB 617 Wilmington, Carson, West Long Beach community.</p> <p>Staff previously provided comments on the Notice of Preparation for a Draft Environmental Impact Report, which can be accessed at: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2022/november/LAC221004-04.pdf.</p> <p>Reference: LAC221004-04</p> <p>Comment Period: 5/14/2025 - 7/14/2025 Public Hearing: N/A</p> | Initial Project Consultation | Metropolitan Water District of Southern California | Document reviewed - No comments sent |
| <i>Waste and Water-related</i> LAC250502-01 Community Survey: General Electric Property# | <p>The project consists of cleaning up polychlorinated biphenyls and volatile organic compounds at the 2.5-acre industrial area site. The project is located at 6900 Stanford Avenue in Los Angeles and within the designated AB617 South Los Angeles and Southeast Los Angeles community.</p> <p>Comment Period: 4/30/2025 - 5/1/2025 Public Hearing: N/A</p> | Other | Department of Toxic Substances Control (DTSC) | Document reviewed - No comments sent |

Key:
= Project has potential environmental justice concerns due to the nature and/or location of the project.
LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP = Project located outside of South Coast AQMD jurisdiction
Project Notes:
1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to June 30, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|---|--|---|---|--|
| Waste and Water-related LAC250506-03 Heraeus Precious Metals - Hazardous Waste Facility Permit Modification | The project consists of replacing two 750-gallon reactors (K-3 and K-24) due to worn out liners. The project is located at 15524 Carmenita Road in Santa Fe Springs. Reference: LAC230322-04 Comment Period: N/A Public Hearing: N/A | Other | Department of Toxic Substances Control (DTSC) | Document reviewed - No comments sent |
| Waste and Water-related LAC250512-01 Sand Canyon Sewer Relocation Project | The project consists of constructing a 0.7-mile sewer line that would begin on an overbank adjacent to the north line of the Santa Clara River and south of State Route 14 and includes: 1) making additional minor modifications and adjustments to the access road; 2) aligning the multipurpose trail; 3) modifying the soil cement bank protection to include rock slope protection in three locations; 4) removing the exposed portions of nine manholes from within the Santa Clara River channel; and 5) installing new access banks from the Santa Clara River to the manhole locations. The majority of the project is located in an undeveloped area to the north of Santa Clara River and along the northern bank of the Santa Clara River. A portion of the project is located along Sand Canyon Road and terminates near existing commercial uses east of the right-of-way. The project encompasses 2.5 acres located in the eastern portion of Santa Clarita. References: LAC240417-06; LAC240328-02; LAC240306-01; LAC230308-0; LAC140221-01; and LAC161201-01 Comment Period: 5/9/2025 - 6/9/2025 Public Hearing: N/A | Addendum to the Initial Study/Draft Mitigated Negative Declaration | Santa Clarita Valley Water Agency | Document reviewed - No comments sent |
| Waste and Water-related LAC250513-01 Community Survey - Pontius | The project consists of cleaning up volatile organic compounds including tetrachloroethene and trichloroethene. A Removal Action Plan will be prepared and implemented to address these issues. The project site is located at 2330 Pontius Avenue in Los Angeles. Comment Period: 5/12/2025 - 6/2/2025 Public Hearing: N/A | Community Survey | Department of Toxic Substances Control (DTSC) | Document reviewed - No comments sent |

Key:

= Project has potential environmental justice concerns due to the nature and/or location of the project.

LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP =

Project located outside of South Coast AQMD jurisdiction

Project Notes:

1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to June 30, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|--|---|--|--|--------------------------------------|
| <i>Waste and Water-related</i> LAC250513-02 Class 1 Permit Notification Pacific Resource Recovery Services# | The project consists of a request for a Class 1 Permit Modification to: 1) provide notification of the intended replacement of two existing tanks with new tanks built to the same design standards; 2) install a mixer on one of its tanks; 3) update a list of equipment subject to air emissions standards in the facilities permit application; 4) request removal of a permit condition that is no longer need because its terms have been satisfied; and 5) correct typographical and administrative errors . The project is located at 3150 East Pico Boulevard in Los Angeles and within the designated AB 617 East Los Angeles, Boyle Heights, and West Commerce community. Reference: LAC241002-08 Comment Period: N/A Public Hearing: N/A | Other | Department of Toxic Substances Control (DTSC) | Document reviewed - No comments sent |
| <i>Waste and Water-related</i> LAC250514-02 Arroyo Seco Water Reuse Project | The project consists of developing two regional stormwater capture and treatment facilities in the Lower Arroyo Seco Channel adjacent to the Arroyo Seco Channel (the Channel) at: 1) the northern, San Rafael Site which is situated in southwest of the San Rafael Avenue overpass of the Channel; and 2) the southern, San Pascual Site which is situated southeast of the San Pascual Avenue overpass of the Channel and on the east side of the Channel. The project is located in Pasadena and South Pasadena. Reference: LAC231201-12 https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2025/june-2025/lac250514-02.pdf Comment Period: 5/15/2025 - 6/13/2025 Public Hearing: N/A | Notice of Preparation of a Draft Environmental Impact Report | City of Pasadena | Comment letter sent on 6/12/2025 |
| <i>Waste and Water-related</i> LAC250515-01 Pure Water Southern California Program# | The project consists of constructing a regional water recycling facility that would be capable of producing high quality water to refill underground reservoirs for use in the event of an earthquake or other emergency that disrupts imported water supplies. The project is located at 24501 South Figueroa Street on the northwest corner of South Figueroa Street and West Lomita Boulevard in Carson and encompasses unincorporated areas of Los Angeles, Orange, and San Bernardino counties in the designated AB 617 Wilmington, Carson, West Long Beach community. Staff previously provided comments on the Notice of Preparation of a Draft Environmental Impact Report, which can be accessed at: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2022/november/LAC221004-04.pdf References: LAC250501-03 and LAC221004-04 https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2025/july-2025/lac250515-01.pdf Comment Period: 5/14/2025 - 7/14/2025 Public Hearing: N/A | Draft Environmental Impact Report | Metropolitan Water District of Southern California | Comment letter sent on 7/11/2025 |

Key:
= Project has potential environmental justice concerns due to the nature and/or location of the project.
LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP = Project located outside of South Coast AQMD jurisdiction
Project Notes:
1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to June 30, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|---|--|---|---|--|
| <i>Waste and Water-related</i> ORC250502-06 Carbon Canyon Dam Safety Modification Study | The project consists of investigating dam safety improvements to reduce dam safety risk and providing a basis from which to recommend a plan for implementation. The project is located in Carbon Canyon. References: ORC100831-07 and ORC100105-03 Comment Period: N/A Public Hearing: N/A | Initial Project Consultation | U.S. Army Corps of Engineers | Document reviewed - No comments sent |
| <i>Waste and Water-related</i> ORC250506-06 S & S Polishing and Plating | The project consists of cleaning up metals and volatile organic compounds at the facility located at 1503 North Miller Street in Anaheim. Reference: ORC250312-07 Comment Period: 5/8/2025 - 6/6/2025 Public Hearing: N/A | Other | Department of Toxic Substances Control (DTSC) | Document reviewed - No comments sent |
| <i>Waste and Water-related</i> ORC250514-03 Coyote Canyon Landfill Gas-to- Energy Plant Project | The project consists of demolishing existing gas-to-energy facilities and constructing a wireless telecommunication facility on 4.14 acres. The project is located at 20662 Newport Coast Drive near the northeast corner of San Joaquin Hills Road and Newport Coast Drive in Newport Beach. References: ORC180403-15; ORC160928-01; and ORC160804-05 Comment Period: N/A Public Hearing: N/A | Response to Comments | City of Newport Beach | Document reviewed - No comments sent |
| <i>Waste and Water-related</i> ORC250520-03 Aliso Creek Lift Station Improvement Projects | The project consists of: 1) demolishing, abandoning, removing, relocating, reconfiguring, replacing, and converting various components of the existing lift station; 2) constructing a new wet well, new electrical building, two new emergency discharge manholes, a new force main connection and a new access driveway on Avenida Sevilla; and 3) removing 15 trees. The project is located on 0.16 acre at the existing Aliso Creek Lift Station, immediately north of Avenida Sevilla overcrossing of Aliso Creek in the Laguna Woods Village in Laguna Woods. Reference: ORC250304-05 Comment Period: N/A Public Hearing: N/A | Final Initial Study/Mitigated Negative Declaration | El Toro Water District | Document reviewed - No comments sent |

Key:

= Project has potential environmental justice concerns due to the nature and/or location of the project.

LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP =

Project located outside of South Coast AQMD jurisdiction

Project Notes:

1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to June 30, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|---|---|--|---|--------------------------------------|
| Waste and Water-related SBC250527-07 Kaiser Ventures, Inc. | The project consists of a permit renewal that requires the facility to monitor and maintain a hazardous waste landfill that was created to contain waste from the former steel mill. The Chemwest Upper Ponds/Consolidated Waste Cell, Aboveground Storage Tanks, Chrome Ponds and Adjacent Areas, and cap area covers an area of approximately 29 acres. The project is located at 13557 San Bernardino Avenue in Fontana. References: SBC240821-11; SBC190822-03; and SBC160719-04 Comment Period: 5/27/2025 - 6/18/2025 Public Hearing: N/A | Other | Department of Toxic Substances Control (DTSC) | Document reviewed - No comments sent |
| Utilities ORC250506-08 Compass Energy Storage Project | The project consists of constructing a battery energy storage system that would be capable of storing up to 250 megawatts (MW) of electricity for up to four hours (up to 1,000 MW-hours) on 12.4 acres. The project is bounded by Saddleback Church Rancho Capistrano to the north, Interstate 5 to the east, Oso Creak to the east and south, and the city limits of San Juan Capistrano to the west in San Juan Capistrano. Reference: ORC240419-01 Comment Period: 5/3/2025 - 6/2/2025 Public Hearing: N/A | Notice of Preparation of a Draft Environmental Impact Report | California Energy Commission | Document reviewed - No comments sent |
| Transportation ORC250502-07 LCP Amendment No. LCP -5 DPT-25- 0008-1 - Strand Transit System | The project consists of amending the language in the Implementation Plan and Land Use Plan of the certified Local Coastal Program. The terms “funicular” and “inclined elevator” will be replaced with Strand Transit System (STS). The project is located in Orange County. Comment Period: 4/30/2025 - 5/6/2025 Public Hearing: 5/7/2025 | Other | California Coastal Commission | Document reviewed - No comments sent |

Key:
= Project has potential environmental justice concerns due to the nature and/or location of the project.
LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP = Project located outside of South Coast AQMD jurisdiction
Project Notes:
1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to June 30, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|---|---|--------------------------------------|-------------------|--------------------------------------|
| <i>Institutional (schools, government, etc.)</i> RVC250519-01 Interstate 215/Ellis Avenue Overcrossing Project | The project consists of constructing a new overcrossing bridge on Interstate 215 at Ellis Avenue with various alternatives. The project is located at Ellis Avenue, 0.9 mile south of the interchange between Interstate 215 and the east interchange of State Route 74 in Perris. Comment Period: 5/19/2025 - 6/19/2025 Public Hearing: N/A | Draft Environmental Impact Report | City of Perris | Document reviewed - No comments sent |
| <i>Institutional (schools, government, etc.)</i> RVC250521-05 Fritz Burns Park and City Maintenance and Operations: Yard Improvements Project | The project consists of: 1) demolishing and removing landscaping, applying concrete and asphalt making improvements to park equipment, the swimming pool, pathways, lighting, and landscaping on 4.04 acres at Fritz Burns Park; and 2) demolishing and removing three existing buildings and constructing a 12,380 square foot building on 2.82 acres at the City of La Quinta's Maintenance and Operations Yard. The project is located on the southeast corner of Avenue 52 and Avenida Bermudas in La Quinta. Comment Period: 5/27/2025 - 6/16/2025 Public Hearing: N/A | Draft Mitigated Negative Declaration | City of La Quinta | Document reviewed - No comments sent |
| <i>Medical Facility</i> RVC250520-05 Kaiser Permanente Medical Office (PLN24-0103) | The project consists of constructing a three-story 50,800 square foot medical office building on five acres. The project is located at the northeast corner of Rouse Road and Encanto Drive in Meniffee. Comment Period: N/A Public Hearing: 5/28/2025 | Other | City of Meniffee | Document reviewed - No comments sent |

Key:
 # = Project has potential environmental justice concerns due to the nature and/or location of the project.
 LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP = Project located outside of South Coast AQMD jurisdiction
 Project Notes:
 1. Disposition may change prior to Governing Board Meeting
 2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to June 30, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|--|---|---|--------------------------------|--|
| Retail RVC250520-06 Riverside Alive Project | The project consists of constructing 168 residential units, a hotel with 376 rooms, a parking facility with five levels, 220,000 square feet for office uses, 12,875 square feet for restaurant uses, 20,690 square feet for grocery store uses, and 28,416 for fitness center uses on 10 acres. The project is located on the southwest corner of Orange Street and 3 rd Street in Riverside. Reference: RVC241010-08 Comment Period: 5/23/2025 - 7/7/2025 Public Hearing: N/A | Draft Environmental Impact Report | City of Riverside | Document reviewed - No comments sent |
| Retail RVC250527-03 PLN25-0077 and PLN25-0078 (PR24-0236) Dutch Bros. Coffee and Mixed- Use Building | The project consists of constructing two mixed-use developments on 8.63 acres with: 1) a 1,025 square foot building; and 2) an 8,200 square foot building. The project also includes parking spaces, drive-thru lanes, a bypass exit lane, two trash enclosures, and a customer walk-up window on the north side of the building. The project is located south of Newport Road, east of Bradley and west of Evans Road in Menifee. Comment Period: 5/27/2025 - 6/12/2025 Public Hearing: N/A | Site Plan | City of Menifee | Document reviewed - No comments sent |
| Retail SBC250527-06 PROJ-2025-00058/PROJ-2025-00056 | The project consists of constructing two restaurants and landscaping, which includes: 1) a 3,655 square foot McDonald's Restaurant and a drive-thru on a 0.89-acre parcel; 2) a 1,266 square foot Starbucks Coffee Shop with a drive-through on a 0.63-acre parcel; and 3) a five-foot reduction to the 15-foot required setback along Cedar Avenue. The project is located on Cedar Avenue in San Bernardino County. Comment Period: N/A Public Hearing: 6/5/2025 | Other | County of San Bernardino | Document reviewed - No comments sent |

Key:

= Project has potential environmental justice concerns due to the nature and/or location of the project.

LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP =

Project located outside of South Coast AQMD jurisdiction

Project Notes:

1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to June 30, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|--|--|----------------------------------|-----------------------|--------------------------------------|
| General Land Use (residential, etc.) LAC250501-02 The Grace Villas Housing Project | The project consists of constructing a seven-story building to house Transition Age Youth. The project is located in the Lincoln Heights area of East Los Angeles, at 216-224 South Avenue 24 in Los Angeles. Comment Period: 4/28/2025 - 5/13/2025 Public Hearing: N/A | Finding of No Significant Impact | City of Los Angeles | Document reviewed - No comments sent |
| General Land Use (residential, etc.) LAC250502-03 1216-1224 Menlo Avenue | The project consists of: 1) demolishing a two-story building and an existing three-story historic Craftsman Home due to fire damage; 2) constructing a new one-story home within the same footprint; 3) constructing a six-story building with 127 restricted units with 31 permanent supported housing, 95 units for low-income households, and one 1-bedroom unit to be designated as a manager's unrestricted unit. The project is located at 1226-1224 Menlo Avenue in Los Angeles. Comment Period: 5/1/2025 - 5/16/2025 Public Hearing: N/A | Finding of No Significant Impact | City of Los Angeles | Document reviewed - No comments sent |
| General Land Use (residential, etc.) LAC250506-01 Tentative Tract Map 84680 | The project consists of constructing a new mixed-use building with 369 residential units and a 20,740 square foot commercial area. The project is located at 740-780 Garvey Avenue and 220 S Atlantic Boulevard in Monterey Park. Comment Period: 5/2/2025 - 5/19/2025 Public Hearing: N/A | Site Plan | City of Monterey Park | Document reviewed - No comments sent |

Key:

= Project has potential environmental justice concerns due to the nature and/or location of the project.

LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP =

Project located outside of South Coast AQMD jurisdiction

Project Notes:

1. Disposition may change prior to Governing Board Meeting

2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to June 30, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|--|--|--|-----------------------------------|--|
| <i>General Land Use (residential, etc.)</i> LAC250506-04 Newhall Avenue Mixed Use Project | The project consists of subdividing a 9.7-acre property into three lots for future construction of 106 residential units, 70 apartments, 26 townhomes, and 4,000 square feet of commercial uses. The project is located at 23755 Newhall Avenue in Santa Clarita. Comment Period: 4/29/2025 - 5/20/2025 Public Hearing: 5/20/2025 | Draft Mitigated Negative Declaration | City of Santa Clarita | Document reviewed - No comments sent |
| <i>General Land Use (residential, etc.)</i> LAC250513-03 Tentative Tract Map 84666 | The project consists of constructing and subdividing three single-family condominiums and converting one lot into four lots. The project is located at 1585 Sombrero Drive in Monterey Park. Comment Period: 5/14/2025 - 5/29/2025 Public Hearing: N/A | Site Plan | City of Monterey Park | Document reviewed - No comments sent |
| <i>Plans and Regulations</i> ORC250502-04 El Camino Specific Plan Amendment | The project consists of expanding a mixed-use development and performing arts center by constructing: 1) The Forster & El Camino Mixed Use Project on a 3.17-acre vacant site; and 2) a Performing Arts Center on a 1.88-acre site. The project is located at 31878 Camino Capistrano in San Juan Capistrano. Staff previously provided comments on the Notice of Preparation of a Draft Environmental Impact Report, which can be accessed at: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/november-2023/ORC231011-09.pdf . References: ORC231011-09 and ORC210824-02 Comment Period: 4/24/2025 - 6/9/2025 Public Hearing: N/A | Draft Environmental Impact Report | City of San Juan Capistrano | Document reviewed - No comments sent |

Key:

= Project has potential environmental justice concerns due to the nature and/or location of the project.

LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP =

Project located outside of South Coast AQMD jurisdiction

Project Notes:

1. Disposition may change prior to Governing Board Meeting

2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to June 30, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|---|---|--|----------------------|--|
| General Land Use (residential, etc.) RVC250507-04 Taylor Apartment Complex (SPR24- 00007) | The project consists of developing two parcels on a 4.71-acre site by constructing new multiple family residences comprised of a 70-unit apartment complex with 14 buildings with a total floor area of approximately 92,984 square feet and a building footprint of 54,802 square feet. The project is located east of C Avenue, 180 feet north of Lime Street and 890 feet south of Muscatel Street in the central portion of Hesperia. Comment Period: 5/6/2025 - 6/4/2025 Public Hearing: N/A | Draft Mitigated Negative Declaration | City of Hesperia | Document reviewed - No comments sent |
| Retail RVC250512-08 Preliminary Review (PR) 2025- 012 Hemet Stock Farm | The project consists of: 1) constructing a mixed-use building with commercial space including a new hotel; 2) constructing 174 single family homes and 26 townhomes; and 3) preserving existing historic structures. The project is located at 230 W. Devonshire Avenue and is bounded by Devonshire Avenue, State Street, Gilbert Street and Oakland Avenue in Hemet. Comment Period: 5/12/2025 - 5/14/2025 Public Hearing: N/A | Site Plan | City of Hemet | Document reviewed - No comments sent |
| General Land Use (residential, etc.) RVC250513-08 Preliminary Review 2025-006 | The project consists of subdividing 17.7 acres into 15 residential lots. The project is located to the west of Santa Fe Avenue, between Menlo Avenue and E Fruitvale Avenue in Hemet. Comment Period: 5/14/2025 - 5/21/2025 Public Hearing: N/A | Site Plan | City of Hemet | Document reviewed - No comments sent |
| Plans and Regulations RVC250520-04 Highway 111 Corridor Specific Plan and Development Code | The project consists of developing a Highway 111 Corridor Specific Plan and revising the Development Code to transform the area into a mixed-use corridor. The project is located approximately two miles along Highway 11 between Washington Street to the west, Jefferson Street to the east, the Whitewater Wash to the north, and Avenue 48 to the south, in La Quinta. Comment Period: 5/19/2025 - 6/19/2025 Public Hearing: 6/24/2025 | Draft Mitigated Negative Declaration | City of La Quinta | Document reviewed - No comments sent |

Key:

= Project has potential environmental justice concerns due to the nature and/or location of the project.

LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP =

Project located outside of South Coast AQMD jurisdiction

Project Notes:

1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to June 30, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|---|---|---|-----------------------|--------------------------------------|
| General Land Use (residential, etc.) SBC250513-09 Eden Mixed-Use Development Project | The project consists of: 1) constructing a self-storage facility along Euclid Avenue frontage; 2) constructing a mixed-use development consisting of 20,800 square feet of commercial retail, a 132,438 square foot self-storage facility, and a 265-unit residential rental development consisting of a three- to four-story apartment building at a density of 26.9 dwelling units per acre; 3) subdividing an approximately 9.82-acre site into five lots ranging from approximately 28,000 square feet to 218,000 square feet; and 4) requesting to allow two fast food drive-thru restaurants along the Schaefer Avenue Project frontage. The project is located on the north side of Schaefer Avenue between Euclid Avenue and Fern Avenue in Chino. Reference: SBC230214-11 Comment Period: 5/14/2025 - 5/21/2025 Public Hearing: 5/21/2025 | Other | City of Chino | Document reviewed - No comments sent |
| Plans and Regulations SBC250519-02 Walker Ranch Specific Plan (File Nos. PSP-24-0001 & PMTT24-0004) | The project consists of a residential development within 7.6 net acres of the 79.2 gross-acre site with: 1) a maximum buildout of 1,557 units and a potential target buildout of 940 units within the specified Planning Areas; 2) an Implementing Project consisting of 920 units on 67.2 net acres of the site; 3) a Tentative Tract Map (TTM No. 20670) which subdivides the 38-net acre portion of the site north of Southern California Edison on into 86 numbered lots (Lot 1- 86); 4) 21 lettered lots (Lot A-X), and three street/alley lots; and 5) additional improvements which include roadways, bicycle and pedestrian facilities, parking, landscaping parks, recreation facilities and utility infrastructure. The project is located at the northwest corner of the intersection of Edison Avenue to the south, Walker Avenue to the east and agricultural land to the west; and is bounded by Schaefer Avenue to the north in Ontario. Comment Period: 5/20/2025 - 6/19/2025 Public Hearing: N/A | Draft Environmental Impact Report | City of Ontario | Document reviewed - No comments sent |
| Plans and Regulations LAC250502-02 Tentative Tract Map 084721 | The project consists of subdividing a property for air rights, developing a nine-unit condominium complex, and consolidating two lots into one lot. The project is located at 338-346 Sefton Avenue in Monterey Park. Comment Period: 4/30/2025 - 5/13/2025 Public Hearing: N/A | Site Plan | City of Monterey Park | Document reviewed - No comments sent |

Key:
= Project has potential environmental justice concerns due to the nature and/or location of the project.
LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP = Project located outside of South Coast AQMD jurisdiction
Project Notes:
1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to June 30, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|--|--|--|-----------------------------|--|
| Plans and Regulations LAC250512-02 City of Seal Beach Housing Element and Zoning Code Update Project | The project consists of establishing eight housing opportunity sites, the Main Street Program, Old Ranch Country Club Pipeline Project, and Accessory Dwelling Units on a site of 259.45 acres with 60.06 acres to be developed under a Housing Element and Zoning Code Update. The project is located in Seal Beach. Comment Period: 5/9/2025 - 6/23/2025 Public Hearing: N/A | Draft Environmental Impact Report | City of Seal Beach | Document reviewed - No comments sent |
| Plans and Regulations LAC250522-01 Washington Boulevard Transit Oriented Development Specific Plan Project | The project consists of developing 305 acres with the primary goal of promoting future revitalization and reuse of the Washington/Rosemead Boulevard area to support the future extension of the E Line (formerly referred to as the Gold Line) to create a compact multi-modal, mixed-use, and sustainable environment that is a focal point for community activity. The project assumes a maximum buildout of 2,336 new residential units and approximately 5,889,747 square feet of new non-residential uses (commercial, retail, office, public facilities, etc.). A General Plan Amendment to update the land use map and a Municipal Code Amendment to update the zoning map will be processed in conjunction with the proposed Specific Plan Project Area. The project is located in Pico Rivera and is generally bound by Washington Boulevard to the north, Rosemead Boulevard to the east, Paramount Boulevard to the west, and a BNSF Pico Rivera rail yard to the south. Comment Period: 5/23/2025 - 7/11/2025 Public Hearing: N/A | Draft Environmental Impact Report | City of Pico Rivera | Document reviewed - No comments sent |
| Plans and Regulations ORC250512-03 Laguna Niguel General Plan Update | The project consists of updating the General Plan and evaluating three opportunity areas: the Marketplace at Laguna Niguel, the Chet Holifield Federal Building, and the Town Center, each serving a district role. The project is located in Laguna Niguel. Comment Period: 5/13/2025 - 6/11/2025 Public Hearing: N/A | Notice of Preparation of a Draft Program Environmental Impact Report | City of Laguna Niguel | Document reviewed - No comments sent |

Key:
= Project has potential environmental justice concerns due to the nature and/or location of the project.
LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP =
Project located outside of South Coast AQMD jurisdiction
Project Notes:
1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to June 30, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|---|--|-----------------|-------------------|--|
| <i>Plans and Regulations</i> | <p>The project consists of: 1) developing 65 single family residences, private community facilities and ancillary features on a 9.16-acre portion of the 15th Street flood control basin; 2) modifying 6.85-acres on the 15th Street flood control basin east of the proposed features to retain the basin’s stormwater and flood control capacity/improvements; 3) extending 15th Street from the southwest corner of the site to Campus Avenue; and 4) developing a 0.15-acre public pocket park on 15th Street near the north end of Fernando Avenue, as specified in the Villa Serena Specific Plan. The project is located on the 20.3-acre 15th Street flood control basin south of Upland Hills Country Club in the central-eastern portion of Upland.</p> <p>References: SBC250408-06 and SBC241105-06</p> <p>Comment Period: N/A</p> <p style="text-align: right;">Public Hearing: 6/9/2025</p> | Other | City of Upland | Document reviewed - No comments sent |
| <p>SBC250520-07 Villa Serena Specific Plan</p> | | | | |

Key:
= Project has potential environmental justice concerns due to the nature and/or location of the project.
LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP =
Project located outside of South Coast AQMD jurisdiction
Project Notes:
1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to June 30, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|---|--|--------------------------------------|---|--------------------------------------|
| <i>Waste and Water-related</i> LAC250604-06 Community Update & Survey: South Broadway and 65th Street Project# | The project consists of cleaning up tetrachlorethylene, trichlorethylene, and volatile organic compounds from the soil which occurred through spills, improper disposal, and other handling processes on the 0.13-acre site which was formerly a dry-cleaning facility. The project is located at the corner of South Broadway and 65th Street in Los Angeles and is located within the designated AB 617 South Los Angeles community. Comment Period: 6/2/2025 - 6/20/2025 Public Hearing: N/A | Other | Department of Toxic Substances Control (DTSC) | Document reviewed - No comments sent |
| <i>Waste and Water-related</i> LAC250612-01 Remedial Action Plan for the Former Mouren-Laurens and Leach Oil Sites Project # | The project consists of a cleaning up petroleum hydrocarbons, chlorinated solvents, and other chemicals of concern on 3.76 acres which was formerly the Mouren-Laurens Oil Company and on 2.24 acres which is the Leach Oil Company Incorporated facility.. The project is located at 625 East Compton Boulevard and 15006 South Avalon Boulevard in an unincorporated portion of Los Angeles County near the City of Compton. The project is located within the designated AB617 South Los Angeles community. Staff previously provided comments on the Draft Negative Declaration which can be accessed at: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2025/march-2025/LAC250221-01.pdf . Comment Period: N/A Public Hearing: N/A | Response to Comments | California Regional Water Quality Control Board, Los Angeles Region 4 | Document reviewed - No comments sent |
| <i>Waste and Water-related</i> LAC250616-01 Lynwood Park Stormwater Capture Project# | The project consists of demolishing existing facilities and constructing a regional stormwater runoff capture facility with the following features: 1) a butterfly garden and ephemeral stream; 2) native landscaping; and 3) a concrete walking path as a new passive recreation opportunity in the park. The project is located at 11301 Bullis Road in Lynwood and within the designated AB617 South Los Angeles community. Comment Period: 6/16/2025 - 7/16/2025 Public Hearing: N/A | Draft Mitigated Negative Declaration | City of Lynwood | Document reviewed - No comments sent |

Key:
= Project has potential environmental justice concerns due to the nature and/or location of the project.
LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP = Project located outside of South Coast AQMD jurisdiction
Project Notes:
1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to June 30, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|---|---|--------------|---|--------------------------------------|
| <i>Waste and Water-related</i> LAC250617-04 Community Survey: Former ITT Goulds Pumps | The project consists of the cleaning up of tetrachlorethylene which has been detected in soil and soil vapor at concentrations that exceed applicable screening levels. The project site is located at 3951 Capitol Avenue in the City of Industry. Comment Period: 6/18/2025 - 7/3/2025 Public Hearing: N/A | Other | Department of Toxic Substances Control (DTSC) | Document reviewed - No comments sent |
| <i>Waste and Water-related</i> LAC250624-01 147th Street Auto Parking & Storage | The project consists of ongoing environmental investigations and cleanup activities conducted from 2022 to 2025 and implementation of the Final Remedial Action Plan which proposes a full-scale soil vapor extraction (SVE) to address areas of environmental impact and the installation of a vapor intrusion mitigation system at the residential construction site which began in May 2025. A full-scale SVE is scheduled to start two months after construction begins. The site located at 3147 West 147th Street in Gardena. Comment Period: N/A Public Hearing: N/A | Other | California Regional Water Quality Control Board, Los Angeles Region 4 (RWQCB) | Under review, may submit comments |
| <i>Waste and Water-related</i> LAC250624-03 Former Alcoa/TRE Westlock Facility# | The project consists of planned offsite environmental assessment activities at two locations: 1) 13344 South Main Street; 2) east of the Vanguard Learning Center (VLC), a school under the Compton Unified School District, located at 13305 San Pedro Street in Los Angeles. Both locations are within the AB 617 South Los Angeles community. Reference: LAC250312-03 Comment Period: N/A Public Hearing: N/A | Other | California Regional Water Quality Control Board, Los Angeles Region 4 (RWQCB) | Under review, may submit comments |
| <i>Waste and Water-related</i> LAC250626-01 Skylinks Regional Stormwater Capture Project | The project consists of constructing a stormwater capture and filtration facility beneath a 1.6-acre undeveloped area. The project is located at 3559 Clark Avenue, at the northeast corner of the Skylinks Golf Course in Long Beach. Reference: LAC240319-03 Comment Period: N/A Public Hearing: 7/10/2025 | Other | City of Long Beach | Document reviewed - No comments sent |

Key:
= Project has potential environmental justice concerns due to the nature and/or location of the project.
LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP = Project located outside of South Coast AQMD jurisdiction
Project Notes:
1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to June 30, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|---|---|--------------------------------------|---|--------------------------------------|
| <i>Waste and Water-related</i> ORC250624-06 Frank R. Bowerman (FRB) Landfill | The project consists of constructing a renewable gas facility consisting of: 1) a process equipment area with control and electrical buildings; and 2) a new 2.4 mile pipeline that will run from the point of interconnect within Renewable Natural Gas Project Area in Bee Canyon Access Road to the existing SoCal Gas pipeline on the corner of Portola Parkway and Jeffery Road. The project is located at 11006 Bee Canyon Access Road in Irvine. Reference: ORC240918-01 Comment Period: N/A Public Hearing: N/A | Other | City of Irvine | Under review, may submit comments |
| <i>Waste and Water-related</i> ORC250625-02 Safety Kleen Santa Ana | The project consists of a permit modification request to convert an existing non-hazardous product storage tank to a hazardous waste storage tank to increase the storage capacity by more than 25 percent. The project is located at 2120 South Yale Street in Santa Ana. Comment Period: 7/7/2025 - 8/22/2025 Public Hearing: N/A | Other | Department of Toxic Substances Control (DTSC) | Under review, may submit comments |
| <i>Waste and Water-related</i> RVC250606-02 Steeplechase and Kalmia Booster Pump Station Project | The project consists of constructing a new booster pump station and 1,209 linear feet of 12-inch pipeline. The project is located south of Kalmia Avenue and west of Kayal Avenue in Moreno Valley. Staff previously provided comments on the Draft Mitigated Negative Declaration, which can be accessed at: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/november-2023/RVC231025-11.pdf . Reference: RVC231025-11 Comment Period: N/A Public Hearing: N/A | Final Mitigated Negative Declaration | Eastern Municipal Water District | Document reviewed - No comments sent |

Key:
= Project has potential environmental justice concerns due to the nature and/or location of the project.
LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP = Project located outside of South Coast AQMD jurisdiction
Project Notes:
1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to June 30, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|--|--|--|---|--------------------------------------|
| Utilities RVC250603-07 Redonda Solar Project | The project consists of constructing and operating a 200 megawatt (MW) photovoltaic solar system with up to 250 MW energy storage on 887 acres. The project is located on federal lands in Chuckwalla Valley in Riverside County, and 8.5 miles east of the unincorporated area of Desert Center. Comment Period: 6/2/2025 - 7/1/2025 Public Hearing: N/A | Other | United States Department of the Interior Bureau of Land Management California Desert District | Document reviewed - No comments sent |
| Transportation LAC250605-01 Metro Sepulveda Transit Corridor Project | The project consists of a a high-capacity fixed-guideway transit or monorail transit technology with a northern terminus with a connection to the Van Nuys Metrolink/Amtrak Station and a southern terminus with a connection to the Metro E Line. The project is located in Mar Vista, Westwood, West Los Angeles, Brentwood, Bel Air, Beverly Crest, Sherman Oaks, Encino, Van Nuys, Valley Glen and Panorama City within the City of Los Angeles, as well as portions of the City of Santa Monica and unincorporated Los Angeles County. Staff previously provided comment on the Notice of Preparation of an Environmental Impact Report, which can be accessed at: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2022/january/LAC211201-13.pdf . Reference: LAC211201-13 Comment Period: 6/2/2025 - 8/3/2025 Public Hearing: 8/6/2025 | Draft Environmental Impact Report | Los Angeles County Metropolitan Transportation Authority | Document reviewed - No comments sent |
| Transportation RVC250624-08 Interstate 10/Oak Valley Parkway Interchange Improvement Project | The project consists of reconstructing the I-10 and Oak Valley Parkway interchange to improve traffic flow on Oak Valley Parkway and the I-10 ramps by: 1) replacing and lengthening the Oak Valley Parkway overcrossing structure and improving its existing interchange geometry and implement traffic safety system improvements; 2) increasing the storage capacity of the I-10 off-ramps and providing High Occupancy Vehicle lanes and ramp metering; and 3) constructing sidewalks on the south side of the bridges and Class II bike lanes on both sides of the bridge. The project is located at the interchange between Interstate 10 and Oak Valley Parkway in Beaumont. Comment Period: 6/23/2025 - 7/24/2025 Public Hearing: N/A | Notice of Preparation of a Draft Environmental Impact Report | California Department of Transportation (Caltrans)/City of Beaumont | Under review, may submit comments |

Key:
 # = Project has potential environmental justice concerns due to the nature and/or location of the project.
 LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP = Project located outside of South Coast AQMD jurisdiction
 Project Notes:
 1. Disposition may change prior to Governing Board Meeting
 2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to June 30, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|---|--|---|---------------------|---|
| General Land Use (residential, etc.) LAC250604-01 ENV-2022-6688: 6000 Hollywood Boulevard | <p>The project consists of constructing a mixed-use development comprised of 350 residential units, 136,000 square feet of office uses, 18,004 square feet of retail uses, and 4,038 square feet of restaurant uses on 3.7 acres. The proposed uses would comprise 11 low-rise structures and three primary buildings, as follows: 1) Building A would consist of a 136,000 square-foot six-story office and retail building; 2) Building B would consist of a 289,079 square foot 35-story residential tower; and 3) Building C would consist of a 23,560 square-foot four-story residential building. All the existing improvements and uses would be demolished. The project is located at 5950-6048 West Hollywood Boulevard and 6037 West Carlton Way in Los Angeles.</p> <p>Staff previously provided comments on the Notice of Preparation a Draft Environmental Impact Report, which can be accessed at: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/june-2023/LAC230601-02.pdf.</p> <p>References: LAC241113-05 and LAC230601-02</p> <p style="text-align: center;">Comment Period: N/A Public Hearing: 6/25/2025</p> | Final Environmental Impact Report | City of Los Angeles | Document reviewed - No comments sent |
| General Land Use (residential, etc.) LAC250617-03 Andres Duarte School Project | <p>The project consists of demolishing and/or relocating the existing school buildings and park structures and constructing 25 multi-family residential buildings and redeveloping a public park on 14.15 acres. The redeveloped Otis Gordon Sports Park would include 59 parking spaces and two bike racks. The residential buildings would include 169 townhomes, one 3,155 square feet leasing office, and 377 parking spaces. The project is bounded by Mount Olive Innovation and Technology High School (MIT) to the northwest, vacant school buildings to east, and Otis Gordon Sports Park and a wireless communications storage building to west. The project is located at 1433 Crestfield Drive in Duarte.</p> <p>Reference: LAC241204-11</p> <p style="text-align: center;">Comment Period: 6/16/2025 - 7/31/2025 Public Hearing: 8/18/2025</p> | Draft Environmental Impact Report | City of Duarte | Document reviewed - No comments sent |

Key:

= Project has potential environmental justice concerns due to the nature and/or location of the project.

LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP =

Project located outside of South Coast AQMD jurisdiction

Project Notes:

1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to June 30, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|---|--|--|---------------------|--------------------------------------|
| General Land Use (residential, etc.) LAC250624-02 ENV-2022-6688: 6000 Hollywood Boulevard | <p>The project consists of constructing a mixed-use development comprised of 350 residential units, 136,000 square feet of office uses, 18,004 square feet of retail uses, and 4,038 square feet of restaurant uses on 3.7 acres. The proposed uses would comprise 11 low-rise structures and three primary buildings, as follows: 1) Building A would consist of a 136,000 square-foot six-story office and retail building; 2) Building B would consist of a 289,079 square foot 35-story residential tower; and 3) Building C would consist of a 23,560 square-foot four-story residential building. All the existing improvements and uses would be demolished. The project is located at 5950-6048 West Hollywood Boulevard and 6037 West Carlton Way in Los Angeles.</p> <p>Staff previously provided comments on the Notice of Preparation of a Draft Environmental Impact Report, which can be accessed at: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/june-2023/LAC230601-02.pdf.</p> <p>References: LAC241113-05; LAC230601-02; and LAC250604-01</p> <p style="text-align: center;">Comment Period: N/A Public Hearing: 7/16/2025</p> | Final Environmental Impact Report | City of Los Angeles | Document reviewed - No comments sent |
| General Land Use (residential, etc.) ORC250604-04 Cypress Grove Residential Project | <p>The project consists of 1) demolishing an existing office complex (Tustin Financial Plaza); 2) re-developing a 145-unit, for sale residential condominium development; 3) a Zone Change from Planned Community Business Park to Planned Community Residential; and 4) an approval of a Vesting Tentative Tract Map and Design Review. The 8.5-acre site is located in northwestern Tustin, bordered to the west by Prospect Avenue, to the north by 17th Street, to the east by single family residential uses followed by Howland Way and to the south by single-family residential uses followed by Arbolada Way.</p> <p style="text-align: center;">Comment Period: 5/30/2025 - 6/30/2025 Public Hearing: N/A</p> | Notice of Preparation of a Draft Environmental Impact Report | City of Tustin | Document reviewed - No comments sent |

Key:
 # = Project has potential environmental justice concerns due to the nature and/or location of the project.
 LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP = Project located outside of South Coast AQMD jurisdiction

Project Notes:
 1. Disposition may change prior to Governing Board Meeting
 2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

**ATTACHMENT C PROPOSED AIR PERMIT PROJECTS FOR
WHICH SOUTH COAST AQMD IS CEQA LEAD AGENCY
THROUGH JUNE 30, 2025**

| PROJECT DESCRIPTION | PROPONENT | TYPE OF DOCUMENT | STATUS | CONSULTANT |
|---|---------------------------------|--|--|--|
| <p>Quemetco is proposing to modify its existing South Coast AQMD permits to allow the facility to recycle more batteries and to eliminate the existing daily idle time of the furnaces. The proposed project will increase the rotary feed drying furnace feed rate limit from 600 to 750 tons per day and increase the amount of total coke material allowed to be processed. In addition, the project will allow the use of petroleum coke in lieu of or in addition to calcined coke and remove one existing emergency diesel-fueled internal combustion engine (ICE) and install two new emergency natural gas-fueled ICEs.</p> | <p>Quemetco</p> | <p>Environmental Impact Report (EIR)</p> | <p>The Draft EIR was released for a 124-day public review and comment period from October 14, 2021 to February 15, 2022 and approximately 200 comment letters were received.</p> <p>South Coast AQMD held two community meetings on November 10, 2021, and February 9, 2022, which presented an overview of the proposed project, the CEQA process, detailed analysis of the potentially significant environmental topic areas, and the existing regulatory safeguards. Response to written comments submitted relative to the Draft EIR and oral comments made at the community meetings are currently being prepared by the consultant.</p> <p>After the Draft EIR public comment and review period closed, Quemetco submitted additional applications for other permit modifications. South Coast AQMD staff is evaluating the effect of these new applications on the EIR process.</p> | <p>Trinity Consultants</p> |
| <p>Sunshine Canyon Landfill is proposing to modify its South Coast AQMD permits for its active landfill gas collection and control system to accommodate the increased collection of landfill gas. The proposed project will: 1) install two new low-emission flares with two additional 300-horsepower electric blowers; and 2) increase the landfill gas flow limit of the existing landfill gas collection system.</p> | <p>Sunshine Canyon Landfill</p> | <p>Subsequent Environmental Impact Report (SEIR)</p> | <p>The consultant has provided an updated Draft SEIR which is being concurrently reviewed by South Coast AQMD staff and the facility.</p> | <p>Castle Environmental Consulting</p> |

**ATTACHMENT C PROPOSED AIR PERMIT PROJECTS FOR
WHICH SOUTH COAST AQMD IS CEQA LEAD AGENCY
THROUGH JUNE 30, 2025**

| PROJECT DESCRIPTION | PROPONENT | TYPE OF DOCUMENT | STATUS | CONSULTANT |
|--|--|--|--|----------------------------------|
| <p>SoCalGas is proposing to modify their Title V permit for the Honor Rancho Natural Gas Storage Field to: 1) replace five compressor engines with four new natural gas-fueled compressor engines (each rated at 5,000 horsepower (hp)), new selective catalytic reduction systems and a new aqueous urea storage tank; 2) install two new electric compressors (each rated at 5,500 hp) with associated ancillary equipment; 3) construct a new building to house the new compressors; 4) install an advanced renewable energy system, which will include hydrogen electrolyzers, hydrogen storage, and fuel blending equipment to mix hydrogen with natural gas which will fuel the compressor engines; 5) install a hydrogen vehicle fueling station; 6) install an electric microgrid with an energy storage system and a natural gas fuel cell system; and 7) install one new electricity transmission line which will connect to Southern California Edison.</p> | <p>Southern California Gas Company (SoCalGas)</p> | <p>Addendum to the Final Subsequent Environmental Assessment for Rule 1110.2 and Rule 1100, and the Final Program EIR for the 2016 Air Quality Management Plan</p> | <p>The consultant has prepared a revised preliminary draft Addendum which South Coast AQMD staff is reviewing.</p> | <p>Dudek</p> |
| <p>Tesoro is proposing modifications to its Carson Operations and Wilmington Operations at the Marathon Los Angeles Refinery in order to replace aging coke drums, produce asphalt binder, and make more high-octane, low vapor pressure clean-gasoline blendstock by modifying the fluid feed hydrodesulfurization unit, the fluidized catalytic cracking unit, and the alkylation units.</p> | <p>Tesoro Refining & Marketing Company, LLC (Tesoro)</p> | <p>Notice of Preparation of a Draft Environmental Impact Report and Initial Study (NOP/IS)</p> | <p>South Coast AQMD staff reviewed the preliminary draft NOP/IS and provided comments which are being addressed by the consultant.</p> | <p>Environmental Audit, Inc.</p> |

[↑ Back to Agenda](#)

BOARD MEETING DATE: August 1, 2025

AGENDA NO. 12

REPORT: Rule and Control Measure Forecast

SYNOPSIS: This report highlights South Coast AQMD rulemaking activities and public hearings scheduled for 2025.

COMMITTEE: No Committee Review

RECOMMENDED ACTION:
Receive and file.

Wayne Natri
Executive Officer

SLR:MK:IM:JA:ZS

2025 MASTER CALENDAR

The 2025 Master Calendar provides a list of proposed or proposed amended rules for each month, with a brief description, and a notation in the third column indicating if the rulemaking is for an AQMP, either the 2016 AQMP, 2022 AQMP, or 2024 PM Plan, when adopted, Toxics, AB 617 (for BARCT) or measures identified in an AB 617 Community Emission Reduction Plan (CERP), SIP to address comments or actions from U.S. EPA for a rule that is in an approved SIP, or Other. Rulemaking efforts that are noted for implementation of the 2016 AQMP or 2022 AQMP when adopted, Toxics, and AB 617 are either statutorily required and/or are needed to address a public health concern. Projected emission reductions will be determined during rulemaking.

The following symbols next to the rule number indicate if the rulemaking will be a potentially significant hearing, will reduce criteria pollutants, or is part of the RECLAIM transition. Symbols have been added to indicate the following:

- * *This rulemaking may have a substantial number of public comments.*
- + *This rulemaking will reduce criteria air contaminants and assist toward attainment of ambient air quality standards.*
- # *This rulemaking is part of the transition of RECLAIM to a command-and-control regulatory structure.*

The following table provides a list of changes since the previous Rule Forecast Report.

| | |
|---|---|
| 301 | Permit and Associated Fees |
| Rule 301 is being moved from September to October 2025 to provide additional time to continue work with stakeholders on the proposed fees for the community monitoring. | |
| 2304 316.1 | Commercial Marine Ports Fees for Rule 2304 |
| Proposed Rules 2304 and 316.1 are being moved from October 2025 to 4 th Quarter 2025 to provide additional time to work with stakeholders. | |

- * *Potentially significant hearing*
- + *Reduce criteria air contaminants and assist toward attainment of ambient air quality standards*
- # *Part of the transition of RECLAIM to a command-and-control regulatory structure*

2025 MASTER CALENDAR

| Month | Title and Description | Type of Rulemaking |
|------------------------------------|---|--------------------|
| September | | |
| 223 | <p>Emission Reduction Permits for Large Confined Animal Facilities Proposed Amended Rule 223 will lower the applicability threshold based on U.S. EPA’s Most Stringent Measure requirement. Proposed amendments will implement BCM-04 in the 2016 AQMP. <i>Kalam Cheung 909.396.3281; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AQMP |
| 445* | <p>Wood Burning Devices Proposed Amended Rule 445 will address U.S. EPA requirements for Most Stringent Measures, including lowering the curtailment threshold. <i>Kalam Cheung 909.396.3281; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AQMP |
| 1133 1133.1 1133.2 1133.3 | <p>Composting, Chipping and Grinding, and Related Operations Proposed Amended Rule 1133 series will address U.S. EPA’s Most Stringent Measure requirement, and other best management practices. <i>Michael Morris 909.396.3282; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AQMP |
| 1138 ⁺ | <p>Control of Emissions from Restaurant Operations Proposed Amended Rule 1138 will address U.S. EPA’s Most Stringent Measure requirements to be no less stringent than other air districts. <i>Elaine Shen 909.396.2715; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AQMP |
| October | | |
| 301 | <p>Permit and Associated Fees Rule 301 will be amended to modify fees for cost recovery from operation and maintenance of community monitoring stations required in accordance with Rules 1180 and 1180.1. <i>Kalam Cheung 909.396.3281; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Other |

* Potentially significant hearing

+ Reduce criteria air contaminants and assist toward attainment of ambient air quality standards

Part of the transition of RECLAIM to a command-and-control regulatory structure

2025 MASTER CALENDAR (Continued)

| November | Title and Description | Type of Rulemaking |
|-----------------|---|---------------------------|
| 404 444.1 | <p>Particulate Matter – Concentration Air Curtain Incinerators Proposed Amended Rule 404 and Proposed Rule 444.1 seek to address operations of air curtain incinerators with new provisions and requirements <i>Michael Morris 909.396.3282; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Other |
| 1107 | <p>Coating of Metal Parts and Products Proposed Amended Rule 1107 will seek to phase out two toxic compounds, pCBtF and tBAc, and consider interim VOC limits for certain coatings that are being reformulated as well as other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics / Other |
| 1469 | <p>Hexavalent Chromium Emissions from Chromium Electroplating and Chromic Acid Anodizing Operations Amendments to Rule 1469 may be needed to address potential changes with the CARB’s Hexavalent Chromium Airborne Toxic Control Measure for Chrome Plating and Chromic Acid Anodizing Operations. <i>Kalam Cheung 909.396.3281; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics / Other |

* Potentially significant hearing

+ Reduce criteria air contaminants and assist toward attainment of ambient air quality standards

Part of the transition of RECLAIM to a command-and-control regulatory structure

2025 MASTER CALENDAR (Continued)

| Month | Title and Description | Type of Rulemaking |
|------------------------------------|---|---------------------------|
| December | | |
| 1124 | Aerospace Assembly and Component Manufacturing Operations Proposed Amended Rule 1124 will seek to phase out two toxic compounds, pCBtF and tBAc, and consider interim VOC limits for certain coatings that are being reformulated as well as other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA and Socio: Barbara Radlein 909.396.2716</i> | Toxics / Other |
| 1146 | Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters Proposed amendments to Rule 1146 will seek further emission reductions from an updated BARCT analysis. <i>Michael Morris 909.396.3282; CEQA and Socio: Barbara Radlein 909.396.2716</i> | AQMP / Other |
| 1146.1 [#] | Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters Proposed amendments to Rule 1146.1 seeks further emission reductions from an updated BARCT analysis. <i>Michael Morris 909.396.3282; CEQA and Socio: Barbara Radlein 909.396.2716</i> | AQMP / Other |
| 1445* | Control of Toxic Emissions from Laser and Plasma Arc Metal Cutting Proposed Rule 1445 will establish requirements to reduce hexavalent chromium and other metal toxic air contaminant particulate emissions from laser arc cutting. <i>Kalam Cheung 909.396.3281; CEQA and Socio: Barbara Radlein 909.396.2716</i> | Toxics / AB 617 CERP |
| 4th Quarter 2025 | | |
| | Title and Description | Type of Rulemaking |
| 2304*+ 316.1 | Commercial Marine Ports Fees for Rule 2304 Proposed Rule 2304 will establish requirements for each commercial marine port to develop an alternative charging and fueling infrastructure plan for all port-related emission sources and subsequently install the infrastructure as planned. Proposed Rule 316.1 will establish fees to recover the South Coast AQMD's anticipated cost of implementing Proposed Rule 2304. <i>Elaine Shen 909 396. 2715; CEQA and Socio: Barbara Radlein 909.396.2716</i> | AQMP / AB 617 CERP |

* Potentially significant hearing

+ Reduce criteria air contaminants and assist toward attainment of ambient air quality standards

Part of the transition of RECLAIM to a command-and-control regulatory structure

2025 To-Be-Determined

| 2025 | Title and Description | Type of Rulemaking |
|------------------|---|--------------------|
| 102 | <p>Definition of Terms Proposed amendments may be needed to update and add definitions, and potentially modify exemptions. <i>TBD; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Other |
| 103 | <p>Definition of Geographical Areas Proposed amendments are needed to update geographic areas to be consistent with state and federal references to those geographic areas. <i>TBD; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Other |
| 209 | <p>Transfer and Voiding of Permits Proposed amendments may be needed to clarify requirements for change of ownership and permits and the assessment of associated fees. <i>Kalam Cheung 909.396.3281; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Other |
| 403 | <p>Fugitive Dust Proposed Amended Rule 403 will seek to remove outdated provisions and clarify existing provisions to enhance compliance. <i>TBD; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Other |
| 403.1 | <p>Supplemental Fugitive Dust Control Requirements for Coachella Valley Sources Proposed Amended Rule 403.1 will clarify existing requirements for dust control and remove outdated provisions contained in supporting documents for Rule 403.1. <i>TBD; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Other |
| 407 [#] | <p>Liquid and Gaseous Air Contaminants Proposed Amended Rule 407 will update SO_x emission limits to reflect Best Available Retrofit Control Technology, if needed, remove exemptions for RECLAIM facilities, and update monitoring, reporting, and recordkeeping requirements. <i>TBD; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AB 617 BARCT |
| 410 | <p>Odors from Transfer Stations and Material Recovery Facilities Proposed Amended Rule 410 will clarify existing provisions. Additional provisions may be needed to address activities associated with diversion of food waste to transfer stations or material recovery facilities. <i>TBD; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Other |

* Potentially significant hearing

+ Reduce criteria air contaminants and assist toward attainment of ambient air quality standards

Part of the transition of RECLAIM to a command-and-control regulatory structure

2025 To-Be-Determined (Continued)

| 2025 | Title and Description | Type of Rulemaking |
|--------------------|--|----------------------------------|
| 425 | <p>Odors from Cannabis Processing Proposed Rule 425 will establish requirements for control of odors from cannabis processing. <i>TBD; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Other |
| 430 | <p>Breakdown Provisions Amendments to Rule 430 will be needed to remove exemptions for facilities that exit the RECLAIM program and update references to CEMS rules. Other amendments may be needed to address current policies from U.S. EPA regarding startup, shutdown, and malfunction requirements. <i>TBD; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | RECLAIM / Other |
| 431.1 [#] | <p>Sulfur Content of Gaseous Fuels Proposed Amended Rule 431.1 will assess exemptions, including RECLAIM, and update other provisions, if needed. <i>Heather Farr 909.396.3672; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AB 617 BARCT / AB 617 CERP |
| 431.2 [#] | <p>Sulfur Content of Liquid Fuels Proposed Amended Rule 431.2 will assess exemptions, including RECLAIM, and update other provisions, if needed. <i>Heather Farr 909.396.3672; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AB 617 BARCT / AB 617 CERP |
| 431.3 [#] | <p>Sulfur Content of Fossil Fuels Proposed Amended Rule 431.3 will assess exemptions, including RECLAIM, and update other provisions, if needed. <i>Heather Farr 909.396.3672; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AB 617 BARCT / AB 617 CERP |
| 444 | <p>Open Burning Amendments may be needed to clarify existing provisions. <i>Michael Morris 909.396.3282; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Other |
| 461 | <p>Gasoline Transfer and Dispensing Amendments to Rule 461 may be needed to address potential regulatory gaps. <i>TBD; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Other |
| 468 [#] | <p>Sulfur Recovery Units Proposed Amended Rule 468 will update SO_x emission limits to reflect Best Available Retrofit Control Technology, if needed, remove exemptions for RECLAIM facilities, and update monitoring, reporting, and recordkeeping requirements. <i>TBD; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AB 617 BARCT |

* Potentially significant hearing

+ Reduce criteria air contaminants and assist toward attainment of ambient air quality standards

Part of the transition of RECLAIM to a command-and-control regulatory structure

2025 To-Be-Determined (*Continued*)

| 2025 | Title and Description | Type of Rulemaking |
|------------------------|---|----------------------------------|
| 469 [#] | <p>Sulfuric Acid Units Proposed Amended Rule 469 will update SOx emission limits to reflect Best Available Retrofit Control Technology, if needed, remove exemptions for RECLAIM facilities, and update monitoring, reporting, and recordkeeping requirements. <i>TBD; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AB 617 BARCT |
| 1101 [#] | <p>Secondary Lead Smelters/Sulfur Oxides Proposed Amended Rule 1101 will update SOx emission limits to reflect Best Available Retrofit Control Technology, if needed, remove exemptions for RECLAIM facilities, and update monitoring, reporting, and recordkeeping requirements. <i>TBD; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AB 617 BARCT |
| 1102 | <p>Dry Cleaners Using Solvent Other Than Perchloroethylene Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Michael Morris 909.396.3282; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AB 617 CERP |
| 1105 [#] | <p>Fluid Catalytic Cracking Units SOx Proposed Amended Rule 1105 will update SOx emission limits to reflect Best Available Retrofit Control Technology, if needed, remove exemptions for RECLAIM facilities, and update monitoring, reporting, and recordkeeping requirements. <i>TBD; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AB 617 BARCT / AB 617 CERP |
| 1108 | <p>Cutback Asphalt Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics / Other |
| 1108.1 | <p>Emulsified Asphalt Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics / Other |
| 1110.2* ^{+ #} | <p>Emissions from Gaseous- and Liquid-Fueled Engines Proposed amendments will address use of emergency standby engines, incorporate possible comments by U.S. EPA for approval into the SIP, and address monitoring provisions for new engines. <i>Michael Morris 909.396.3282; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AQMP / AB 617 BARCT |

* *Potentially significant hearing*

+ *Reduce criteria air contaminants and assist toward attainment of ambient air quality standards*

Part of the transition of RECLAIM to a command-and-control regulatory structure

2025 To-Be-Determined (Continued)

| 2025 | Title and Description | Type of Rulemaking |
|-------------------|---|----------------------------------|
| 1110.4 | <p>Emissions from Emergency Generators Proposed Rule 1110.4 will establish and revise rule provisions to reduce NO_x, CO, and PM emissions from emergency generators. <i>Michael Morris 909.396.3282; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Other / AQMP |
| 1113 | <p>Architectural Coatings Proposed amendments may be needed to address delisted compounds and other amendments to improve clarity and to remove obsolete provisions. <i>Heather Farr 909.396.3672; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Other |
| 1114 | <p>Petroleum Refinery Coking Operations Proposed Amended Rule 1114 will seek to add notification requirements when coke particles, liquid and/or gas is ejected from the coke drum during cutting. <i>TBD; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Other |
| 1119 [#] | <p>Petroleum Coke Calcining Operations – Oxides of Sulfur Proposed Amended Rule 1119 will update SO_x emission limits to reflect Best Available Retrofit Control Technology, if needed, remove exemptions for RECLAIM facilities, and update monitoring, reporting, and recordkeeping requirements. <i>TBD; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AB 617 BARCT / AB 617 CERP |
| 1122 | <p>Solvent Degreasers Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics / Other |
| 1125 | <p>Metal Container, Closure, and Coil Coating Operations Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics / Other |
| 1126 | <p>Magnet Wire Coating Operations Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics / Other |

* Potentially significant hearing

+ Reduce criteria air contaminants and assist toward attainment of ambient air quality standards

Part of the transition of RECLAIM to a command-and-control regulatory structure

2025 To-Be-Determined (Continued)

| 2025 | Title and Description | Type of Rulemaking |
|--------|--|--------------------|
| 1128 | <p>Paper, Fabric, and Film Coating Operations Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics / Other |
| 1130 | <p>Graphic Arts Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics / Other |
| 1130.1 | <p>Screen Printing Operations Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics / Other |
| 1142 | <p>Marine Tank Vessel Operations Proposed Amended Rule 1142 will address VOC and hydrogen sulfide emissions from marine tank vessel operations, applicability, noticing requirements, and provide clarifications. <i>TBD; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Other |
| 1143 | <p>Consumer Paint Thinners and Multi-Purpose Solvents Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics / Other |
| 1144 | <p>Metalworking Fluids and Direct-Contact Lubricants Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics / Other |
| 1145 | <p>Plastic, Rubber, Leather, and Glass Coatings Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics / Other |

* Potentially significant hearing

+ Reduce criteria air contaminants and assist toward attainment of ambient air quality standards

Part of the transition of RECLAIM to a command-and-control regulatory structure

2025 To-Be-Determined (Continued)

| 2025 | Title and Description | Type of Rulemaking |
|---|--|---------------------|
| 1162 | <p>Polyester Resin Operations Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics / Other |
| 1166 | <p>Volatile Organic Compound Emissions from Decontamination of Soil Proposed Amended Rule 1166 will update requirements, specifically concerning notifications and usage of mitigation plans (site specific versus various locations). <i>Michael Morris 909.396.3282; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Other |
| 1174 | <p>Control of Volatile Organic Compound Emissions from the Ignition of Barbecue Charcoal Proposed amendments may be needed to address certain exempt compounds, VOC limits for certain applications, and other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AQMP / Other |
| 1176 | <p>VOC Emissions from Wastewater Systems Proposed Amended Rule 1176 will clarify the applicability of the rule to include bulk terminals under definition of “Industrial Facilities,” and streamline and clarify provisions. <i>TBD; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Other / AB 617 CERP |
| 1186.1, 1191, 1192, 1193, 1194, 1195, 1196* + | <p>Fleet Rules Proposed amendments to Rules 1186.1, 1191, 1192, 1193, 1194, 1195, 1196 will seek to align South Coast AQMD fleet rules with CARB’s final Advanced Clean Fleets regulation. <i>Sang-Mi Lee: 909.396.3169; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AQMP / Other |
| 1401 | <p>New Source Review of Toxic Air Contaminants Proposed Amended Rule 1401 will amend Table 1 to include new toxic air contaminants identified by California Office of Environmental Health Hazard Assessment (OEHHA). <i>Kalam Cheung 909.396.3281; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics / Other |
| 1403* | <p>Asbestos Emissions from Demolition/Renovation Activities Proposed Amended Rule 1403 will enhance implementation, improve rule enforceability, update provisions, notifications, exemptions, and align provisions with the applicable U.S. EPA National Emission Standard for Hazardous Air Pollutants (NESHAP) and other state and local requirements as necessary. <i>Kalam Cheung 909.396.3281; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics |

* Potentially significant hearing

+ Reduce criteria air contaminants and assist toward attainment of ambient air quality standards

Part of the transition of RECLAIM to a command-and-control regulatory structure

2025 To-Be-Determined (Continued)

| 2025 | Title and Description | Type of Rulemaking |
|----------------|---|--------------------|
| 1404 | <p>Hexavalent Chromium Emissions from Cooling Towers Amendments may be needed to provide additional clarifications regarding use of process water that is associated with sources that have the potential to contain chromium in cooling towers and address VOC emissions. <i>TBD; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics / AQMP |
| 1411 | <p>Recovery or Recycling of Refrigerants from Motor Vehicle Air Conditioners Proposed Amended Rule 1411 seeks amendments to coincide with Section 609 of the Clean Air Act. <i>TBD; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics |
| 1415 1415.1 | <p>Reduction of Refrigerant Emissions from Stationary Air Conditioning Systems, and Reduction of Refrigerant Emissions from Stationary Refrigeration Systems Proposed Amended Rules 1415 and 1415.1 will align requirements with the proposed CARB Refrigerant Management Program and U.S. EPA’s Significant New Alternatives Policy Rule provisions relative to prohibitions on specific hydrofluorocarbons. <i>TBD; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Other |
| 1420 | <p>Emissions Standard for Lead Proposed Amended Rule 1420 will update requirements to address arsenic emissions to close a regulatory gap between Rule 1420 and Rule 1407 - Control of Emissions of Arsenic, Cadmium, and Nickel from Non-Ferrous Metal Melting Operations. Other provisions may be needed to address storage and handling requirements, and revise closure requirements. <i>Michael Morris 909.396.3282; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics |
| 1420.1 | <p>Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities Proposed Amendments are needed to update applicable test methods and provide clarifications regarding submittal of a source-test protocol. Additional amendments may be needed to address monitoring and post closure requirements. <i>Michael Morris 909.396.3282; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics |

* Potentially significant hearing

+ Reduce criteria air contaminants and assist toward attainment of ambient air quality standards

Part of the transition of RECLAIM to a command-and-control regulatory structure

2025 To-Be-Determined (Continued)

| 2025 | Title and Description | Type of Rulemaking |
|--------|--|----------------------|
| 1420.3 | <p>Emissions Standards for Lead from Firing Ranges Proposed Rule 1420.3 will establish requirements to address lead emissions from firing ranges. <i>Kalam Cheung 909.396.3281; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics / Other |
| 1450* | <p>Control of Methylene Chloride Emissions Proposed Rule 1450 will reduce methylene chloride emissions from furniture stripping and establish monitoring, reporting, and recordkeeping requirements. <i>Michael Morris 909.396.3282; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics |
| 1455 | <p>Control of Hexavalent Chromium Emissions from Torch Cutting and Welding Proposed Rule 1455 will establish requirements to reduce hexavalent chromium emissions from torch cutting and welding of chromium alloys. <i>Kalam Cheung 909.396.3281; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics / AB 617 CERP |
| 1466 | <p>Control of Particulate Emissions from Soils with Toxic Air Contaminants Amendments may be needed for residential cleanup projects. <i>Michael Morris 909.396.3282; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics |
| 1466.1 | <p>Control of Particulate Emissions from Demolition of Buildings Proposed Rule 1466.1 will establish requirements to minimize PM emissions during the demolition of buildings that housed equipment and processes with metal toxic air contaminants and pollution control equipment. <i>Michael Morris 909.396.3282; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics |
| 1470 | <p>Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines Proposed Amended Rule 1470 seeks to reduce NOx emissions from stationary internal combustion engines (ICEs) by replacing older ICEs with alternative cleaner technology. <i>Michael Morris 909.396.3282; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AQMP / Toxics |
| 1470.1 | <p>Emissions from Emergency Standby Diesel-Fueled Engines Proposed Rule 1470.1 seeks to reduce NOx emissions from emergency standby internal combustion engines (ICEs) by replacing older ICEs and requiring the use of commercially available lower emission fuels, such as renewable diesel. <i>Michael Morris 909.396.3282; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AQMP / Toxics |

* Potentially significant hearing

+ Reduce criteria air contaminants and assist toward attainment of ambient air quality standards

Part of the transition of RECLAIM to a command-and-control regulatory structure

2025 To-Be-Determined (Continued)

| 2025 | Title and Description | Type of Rulemaking |
|--------------------------------|---|--------------------|
| 1472 | <p>Requirements for Facilities with Multiple Stationary Emergency Standby Diesel-Fueled Internal Combustion Engines Proposed Amended Rule 1472 will remove provisions that are no longer applicable, update and streamline provisions to reflect the latest OEHHA Health Risk Assessment Guidelines and assess the need for Compliance Plans. <i>Michael Morris 909.396.3282; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics |
| 1480.1 | <p>Ambient Monitoring and Sampling of Gaseous Toxic Air Contaminants Proposed Rule 1480.1 will establish requirements to conduct monitoring and sampling for those facilities identified as significant high-risk level. <i>Heather Farr 909.396.3672; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics |
| 1901 | <p>General Conformity Proposed Amended Rule 1901 will establish a new General Conformity determination process for applicable projects receiving federal funding or approval. <i>TBD; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AQMP |
| Regulation XX | <p>RECLAIM - Requirements for Oxides of Sulfur (SO_x) Emissions Amendments to Regulation XX rules to address SO_x requirements at RECLAIM facilities if there is consideration to transition SO_x RECLAIM to command-and-control regulatory structure. <i>Michael Morris 909.396.3282; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | RECLAIM / Other |
| Regulation XXIII* ⁺ | <p>Facility-Based Mobile Sources Proposed rules within Regulation XXIII would reduce emissions from indirect sources and the mobile sources attracted to these facilities. <i>Elaine Shen 909.396.2715; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AQMP / AB 617 CERP |

* Potentially significant hearing

+ Reduce criteria air contaminants and assist toward attainment of ambient air quality standards

Part of the transition of RECLAIM to a command-and-control regulatory structure

2025 To-Be-Determined (Continued)

| 2025 | Title and Description | Type of Rulemaking |
|--|---|--|
| <p>Regulation II, III, IV, V, VII, VIII, XI, XIV, XIX, XXIII, XXIV, XXX and XXXV</p> | <p>Various rule amendments may be needed to meet the requirements of state and federal laws; implement OEHHA’s latest risk assessment guidance; incorporate changes from OEHHA to new or revised toxic air contaminants or their risk values; address variance issues, emission limits, technology-forcing emission limits, and conflicts with other agency requirements; abate substantial endangerment to public health; apply additional reductions to meet SIP short-term measure commitments; address issues raised by U.S. EPA or CARB for the SIP or for a rule that was submitted into the SIP; and address compliance issues raised by the Hearing Board. In addition, administrative changes could be necessary for Hearing Board procedures, filings, petitions, noticing, etc. Amendments to existing rules may be needed to address use of materials that contain chemicals of concern. The associated rule development or amendments include, but are not limited to, South Coast AQMD existing, or new rules to implement measures in the 2012, 2016 or 2022 AQMP. This includes measures in the 2016 AQMP to reduce toxic air contaminants or reduce exposure to air toxics from stationary, mobile, and area sources. Rule adoption or amendments may include updates to provide consistency with CARB Statewide Air Toxic Control Measures, U.S. EPA’s National Emission Standards for Hazardous Air Pollutants, or to address the lead National Ambient Air Quality Standard. Rule adoption or amendments may be needed to implement AB 617 including but not limited to BARCT rules, Community Emission Reduction Plans prepared pursuant to AB 617, or new or amended rules to abate a public health issue identified through emissions testing or ambient monitoring.</p> | <p>Other / AQMP/ Toxics / AB 617 BARCT / AB 617 CERP</p> |

* *Potentially significant hearing*

+ *Reduce criteria air contaminants and assist toward attainment of ambient air quality standards*

Part of the transition of RECLAIM to a command-and-control regulatory structure

TENTATIVE 2026 CALENDAR

| Month | Title and Description | Type of Rulemaking |
|-------------------------------|--|--------------------|
| 2 nd Quarter | | |
| 1136 | <p>Wood Products Coatings Proposed Amended Rule 1136 will seek to phase out two toxic compounds, pCBtF and tBAC, and consider interim VOC limits for certain coatings that are being reformulated as well as other amendments to improve clarity. <i>Heather Farr 909.396.3672; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics / Other |
| 1420.2 | <p>Emission Standards for Lead from Metal Melting Facilities Proposed Amended Rule 1420.2 will update requirements to address arsenic emissions to close a regulatory gap between Rule 1420 and Rule 1407 - Control of Emissions of Arsenic, Cadmium, and Nickel from Non-Ferrous Metal Melting Operations. Additional amendments may be needed to address monitoring and post closure requirements. <i>Kalam Cheung 909.396.3281; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics |
| 1426.1 | <p>Hexavalent Chromium Emissions from Metal Finishing Operations Proposed Rule 1426.1 will reduce hexavalent chromium emissions from heated chromium tanks used at facilities with metal finishing operations that are not subject to Rule 1469. <i>Kalam Cheung 909.396.3281; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | Toxics |
| 1435* | <p>Control of Toxic Air Contaminant Emissions from Metal Heating Operations Proposed Rule 1435 will establish requirements to reduce point source and fugitive toxic air contaminants including hexavalent chromium emissions from heat treating processes. Proposed Rule 1435 will also include monitoring, reporting, and recordkeeping requirements. <i>Kalam Cheung 909.396.3281; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AQMP / AB 617 CERP |
| Regulation XIII ^{##} | <p>New Source Review Proposed Amended Regulation XIII will revise New Source Review provisions to address facilities that are transitioning from RECLAIM to a command-and-control regulatory structure and to reconcile Regulation XIII with 2002 NSR Reform. Additional rules under Regulation XIII may be needed to address offsets and other provisions under Regulation XIII. <i>Michael Morris 909.396.3282; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AQMP |

* Potentially significant hearing

+ Reduce criteria air contaminants and assist toward attainment of ambient air quality standards

Part of the transition of RECLAIM to a command-and-control regulatory structure

TENTATIVE 2026 CALENDAR *(Continued)*

| Month | Title and Description | Type of Rulemaking |
|--|---|--------------------|
| 2 nd Quarter (Continued) | | |
| Regulation XX*# | <p>RECLAIM Proposed Amended Regulation XX will address the transition of NOx RECLAIM facilities to a command-and-control regulatory structure.</p> <p style="text-align: center;"><i>Michael Morris 909.396.3282; CEQA and Socio: Barbara Radlein 909.396.2716</i></p> | AQMP |

* *Potentially significant hearing*

+ *Reduce criteria air contaminants and assist toward attainment of ambient air quality standards*

Part of the transition of RECLAIM to a command-and-control regulatory structure

 [Back to Agenda](#)

BOARD MEETING DATE: August 1, 2025

AGENDA NO. 13

PROPOSAL: Report of RFQs/RFPs Scheduled for Release in August

SYNOPSIS: This report summarizes the RFQs/RFPs for budgeted services over \$100,000 scheduled to be released for advertisement for the month of August.

COMMITTEE: Administrative, June 13, 2025, Reviewed

RECOMMENDED ACTION:

Approve the release of RFQs/RFPs for the month of August.

Wayne Nastri
Executive Officer

SJ:gp

Background

In January 2020, the Board approved a revised Procurement Policy and Procedure. Under the revised policy, RFQs/RFPs for budgeted items over \$100,000 that follow the Procurement Policy and Procedure would no longer be required to obtain individual Board approval. However, a monthly report of all RFQs/RFPs over \$100,000 is included as part of the Board agenda package and the Board may, if desired, take individual action on any item. The attached report provides the title and synopsis of the RFQ/RFP, the budgeted funds available, and the name of the Deputy Executive Officer/Assistant Deputy Executive Officer responsible for that item. Further detail including closing dates, contact information, and detailed proposal criteria will be available online at <http://www.aqmd.gov/grants-bids> following Board approval on August 1, 2025.

Outreach

In accordance with South Coast AQMD's Procurement Policy and Procedure, a public notice advertising the RFQs/RFPs and inviting bids will be published in the Los Angeles Times, the Orange County Register, the San Bernardino Sun, and Riverside

County's Press Enterprise newspapers to leverage the most cost-effective method of outreach to the South Coast Basin.

Additionally, potential bidders may be notified utilizing South Coast AQMD's own electronic listing of certified minority vendors. Notice of the RFQs/RFPs will be emailed to the legislative caucuses and various minority chambers of commerce and business associations and placed on South Coast AQMD's website (<http://www.aqmd.gov>), where it can be viewed by making the selection "Grants & Bids."

Proposal Evaluation

Proposals received will be evaluated by applicable diverse panels of technically qualified individuals familiar with the subject matter of the project or equipment and may include outside public sector or academic community expertise.

Attachment

Report of RFQs/RFPs Scheduled for Release in August 2025

**August 1, 2025 Board Meeting
Report on RFQs/RFPs Scheduled for Release on August 1, 2025**

(For detailed information visit South Coast AQMD's website at
<http://www.aqmd.gov/nav/grants-bids>
following Board approval on August 1, 2025)

SPECIAL TECHNICAL EXPERTISE

RFP #P2026-01 Issue RFP for Translation and Interpretation Heard-Johnson/3428
Services

Since 2018, South Coast AQMD has implemented the AB 617 Program which involves extensive community engagement and outreach. Translation and interpretation services are essential to the success of the program. This action is to issue an RFP to solicit proposals from qualified firms to provide translation and interpretation services. Funds for these services are included in the FY 2025-26 and FY 2026-27 Budgets and will be requested in subsequent fiscal years.

[↑ Back to Agenda](#)

BOARD MEETING DATE: August 1, 2025

AGENDA NO. 14

REPORT: Status Report on Major Ongoing and Upcoming Projects for Information Management

SYNOPSIS: Information Management is responsible for data systems management services in support of all South Coast AQMD operations. This action is to provide the monthly status report on major automation contracts and planned projects.

COMMITTEE: Administrative, June 13, 2025, Reviewed

RECOMMENDED ACTION:
Receive and file.

Wayne Natri
Executive Officer

RMM:XC:DD:HL:dc

Background

Information Management (IM) provides a wide range of information systems and services in support of all South Coast AQMD operations. IM's primary goal is to provide automated tools and systems to implement rules and regulations, and to improve internal efficiencies. The annual Budget and Board-approved amendments to the Budget specify projects planned during the fiscal year to develop, acquire, enhance, or maintain mission-critical information systems.

Summary of Report

The attached report identifies the major projects/contracts or purchases that are ongoing or expected to be initiated within the next six months. Information provided for each project includes a brief project description and the schedule associated with known major milestones (issue RFP/RFQ, execute contract, etc.).

Attachment

Information Management Status Report on Major Ongoing and Upcoming Projects During the Next Six Months

ATTACHMENT
 August 1, 2025 Board Meeting
 Status Report on Ongoing and Upcoming Projects for
 Information Management

| Agenda Tracking System | |
|---------------------------------|--|
| Brief description: | Develop a new Agenda Tracking System for submittal, review, and approval of Governing Board meeting agenda items |
| Estimated project cost | \$250,000 |
| Overall project status | In Progress |
| Percentage complete | 80% |
| LAST 30 days | <ul style="list-style-type: none"> • User Training |
| NEXT 30 days | <ul style="list-style-type: none"> • User Acceptance Testing |
| Original estimated go-live date | 11/15/24 |
| Current estimated go-live date | 10/10/25 |
| Go-live date | N/A |
| Notes | Schedule extended to accommodate new features, user adoption, training, and testing. |

| Permit Workflow Automation – Phase 1 | |
|---|--|
| Brief description: | Automate application acceptance and engineering evaluation processes into paperless workflows. This phase includes an electronic workflow that encompasses major functions of the Permit Application process |
| Estimated project cost | \$250,000 |
| Overall project status | In Progress |
| Percentage complete | 55% |
| LAST 30 days | <ul style="list-style-type: none"> • System Development in Progress |
| NEXT 30 days | <ul style="list-style-type: none"> • System Development in Progress |
| Original estimated go-live date | 3/14/25 |
| Current estimated go-live date | 10/17/25 |
| Go-live date | N/A |
| Notes | |

ATTACHMENT
 August 1, 2025 Board Meeting
 Status Report on Ongoing and Upcoming Projects for
 Information Management

| Invest Clean | |
|---------------------------------|---|
| Brief description: | Develop a paperless, user-friendly web-based Grant Management System to streamline the application submittal, approval, inspection, contracting, and invoicing process. |
| Estimated project cost | \$250,000 |
| Overall project status | In Progress |
| Percentage complete | 35% |
| LAST 30 days | <ul style="list-style-type: none"> System Development in Progress |
| NEXT 30 days | <ul style="list-style-type: none"> System Development in Progress |
| Original estimated go-live date | 10/10/25 |
| Current estimated go-live date | 10/10/25 |
| Go-live date | N/A |
| Notes | |

| Compliance System | |
|---------------------------------|--|
| Brief description: | Develop a new Compliance System to help streamline the compliance business process. The new system will provide full integration of incident management, inspection process, field operations and operations dashboard |
| Estimated project cost | \$450,000 |
| Overall project status | In Progress |
| Percentage complete | 70% |
| LAST 30 days | <ul style="list-style-type: none"> System Development in Progress |
| NEXT 30 days | <ul style="list-style-type: none"> System Development in Progress |
| Original estimated go-live date | 2/28/25 |
| Current estimated go-live date | 10/17/25 |
| Go-live date | N/A |
| Notes | |

ATTACHMENT
 August 1, 2025 Board Meeting
 Status Report on Ongoing and Upcoming Projects for
 Information Management

| Carl Moyer Program GMS Phase III | |
|---|---|
| Brief description: | Develop Contracting, Invoicing, and Annual Reporting modules for the Carl Moyer Program web application. This system will include integration with internal South Coast AQMD systems. |
| Estimated project cost | \$200,000 |
| Overall project status | Completed |
| Percentage complete | 100% |
| LAST 30 days | <ul style="list-style-type: none"> • Post-Production Support |
| NEXT 30 days | <ul style="list-style-type: none"> • N/A |
| Original estimated go-live date | 4/10/25 |
| Current estimated go-live date | 7/8/25 |
| Go-live date | N/A |
| Notes | |

| AirNet Upgrade | |
|---------------------------------|--|
| Brief description: | Upgrade AirNet (Intranet) to the latest version of SharePoint. This project will involve migrating existing content, custom web parts, and other components, while delivering a modern and refreshed design. |
| Estimated project cost | \$180,000 |
| Overall project status | In Progress |
| Percentage complete | 75% |
| LAST 30 days | <ul style="list-style-type: none"> • System Development in progress |
| NEXT 30 days | <ul style="list-style-type: none"> • System Development in progress |
| Original estimated go-live date | 4/25/25 |
| Current estimated go-live date | 8/9/25 |
| Go-live date | N/A |
| Notes | Schedule extended to address dependent software anomalies. |

ATTACHMENT
 August 1, 2025 Board Meeting
 Status Report on Ongoing and Upcoming Projects for
 Information Management

| Air Quality Data Platform Phase 3 | |
|--|---|
| Brief description: | Integrate individual data systems into a cloud-based platform for efficient data management and the creation of interactive visualizations and dashboards for web access. |
| Estimated project cost | \$386,800 |
| Overall project status | In Progress |
| Percentage complete | 15% |
| LAST 30 days | <ul style="list-style-type: none"> • System Development in progress |
| NEXT 30 days | <ul style="list-style-type: none"> • System Development in progress |
| Original estimated go-live date | 4/22/26 |
| Current estimated go-live date | 4/22/26 |
| Go-live date | N/A |
| Notes | |

| Title V Modernization | |
|---------------------------------|---|
| Brief description: | Expedite and expand Title V data gathering and reporting to ICIS-Air by reusing EPA's VES service and use Shared CROMERR Services (SCS) to enable a CROMERR compliant e-submittal portal. |
| Estimated project cost | \$75,700 |
| Overall project status | In Progress |
| Percentage complete | 15% |
| LAST 30 days | <ul style="list-style-type: none"> • System Development in progress |
| NEXT 30 days | <ul style="list-style-type: none"> • System Development in progress |
| Original estimated go-live date | 8/4/26 |
| Current estimated go-live date | 8/4/26 |
| Go-live date | N/A |
| Notes | |

ATTACHMENT
August 1, 2025 Board Meeting
Status Report on Ongoing and Upcoming Projects for
Information Management

| Projects that have been completed within the last 12 months are shown below | |
|---|--------------------|
| COMPLETED PROJECTS | |
| PROJECT | DATE COMPLETED |
| IDF Network Switch Refresh Phase 6 | May 6, 2025 |
| South Coast AQMD Mobile Application Phase 6 | April 29, 2025 |
| South Coast AQMD Telephone Directory | March 28, 2025 |
| Website Upgrade | March 24, 2025 |
| IDF Network Switch Refresh Phase 5 | March 16, 2025 |
| Forms Approval Workflow | March 11, 2025 |
| Position Management | March 4, 2025 |
| Rideshare Matching Application | February 26, 2025 |
| Wildfire Monitoring | February 21, 2025 |
| School Bus GMS | February 5, 2025 |
| West KM | January 24, 2025 |
| Rule 1109.1 - B-Cap Reporting | January 16, 2025 |
| AB2766 for reporting year 2024 | December 31, 2024 |
| Annual Emissions Reporting for reporting year 2024 | December 31, 2024 |
| Warehouse Indirect Source Rule Online Reporting Portal Phase 4 | November 21, 2024 |
| Rideshare Survey Enhancement | October 18, 2024 |
| Source Test Tracking System (STTS) | September 20, 2024 |
| IT Service Management | September 17, 2024 |
| Rule 1180 System Enhancements | August 16, 2024 |
| Rule 1415 System Enhancements | August 9, 2024 |

[↑ Back to Agenda](#)

BOARD MEETING DATE: August 1, 2025

AGENDA NO. 15

REPORT: Administrative Committee

SYNOPSIS: The Administrative Committee held a hybrid meeting on Friday, June 13, 2025. The following is a summary of the meeting.

RECOMMENDED ACTION:
Receive and file.

Vanessa Delgado, Chair
Administrative Committee

SN:cb

Call to Order

Chair Vanessa Delgado called the meeting to order at 10:10 a.m.

Roll Call

Committee Members

Present: Chair Vanessa Delgado, Committee Chair
Vice Chair Michael Cacciotti
Mayor Pro Tem Larry McCallon
Supervisor V. Manuel Perez

For additional details of the Administrative Committee Meeting, please refer to the [Webcast](#).

DISCUSSION ITEMS:

1. **Board Members' Concerns:** No Board Member concerns to report.
2. **Chair's Report of Approved Travel:** Travel was reported for Vice Chair Cacciotti to Columbus, Indiana to attend a tour of Cummins Engines and Chair Delgado to Olympic Valley, California to attend the California Council for Environmental and Economic Balance Summer Issues Seminar.

3. **Report of Approved Out-of-Country Travel:** Travel was reported for Dr. Raul Dominguez, Sr. AQ Chemist, Monitoring & Analysis, to participate in the National Institute of Advanced Industrial Science and Technology meeting for the International Organization for Standardization Committee in Tokyo, Japan.
4. **Review August 1, 2025 Governing Board Agenda:** Mayor McCallon inquired if we expect all the Set Hearings on the draft Board agenda to go forward. Executive Officer Wayne Nastri confirmed that the rules are needed to meet U.S. EPA requirements and must go forward and indicated that September will be busy. Mayor McCallon indicated some of the Set Hearing rules may generate a lot of public comment. For additional information, please refer to the [Webcast at 2:28](#).
5. **Approval of Compensation for Board Member Assistant(s)/Consultant(s):** This item was moved to Action Items as approval from the Administrative Committee is needed. For additional information, please refer to the [Webcast at 3:40](#).
6. **Update on South Coast AQMD's Internal Engagement Activities:** Anissa Heard-Johnson, Deputy Executive Officer, Community Engagement and Air Programs, provided an update on agency efforts, seasonal events, cultural displays, Statewide Working Group, and discussed Cecilia Chung for Fabulous Female Friday.

Vice Chair Cacciotti asked Dr. Heard-Johnson to comment on the Governing Board Internship program. Dr. Heard-Johnson gave an overview of the program and thanked Vice Chair Cacciotti for addressing the interns.

For additional information, please refer to the [Webcast at 4:17](#).

7. **Pre-Audit Conference (Presenter: Brandon Young, Engagement Partner and Ryan Domino, Quality Assurance Partner):** Sujata Jain, Chief Financial Officer, reported that this item is an entrance conference with the audit firm of Lance, Soll & Lunghard, LLP. Ryan Domino, Quality Assurance Partner, provided a presentation on the timeline of the financial audit for FY 2024-25 that is going to end on June 30, 2025. For additional information, please refer to the [Webcast at 13:09](#).
8. **Report of RFQs/RFPs Scheduled for Release in August:** Ms. Jain reported that this item is to authorize the Executive Officer to execute a contract with a translation and interpretation firm in an amount not to exceed \$200,000 using AB 617 funds for FYs 2025-26 and 2026-27. For additional information, please refer to the [Webcast at 18:36](#).
9. **Status Report on Major Ongoing and Upcoming Projects for Information Management:** Ron Moskowitz, Chief Information Officer, reported on the status

of various projects. For additional information, please refer to the [Webcast at 19:17](#).

Harvey Eder, Public Solar Power Coalition, provided public comment.

ACTION ITEMS:

5. **Approval of Compensation for Board Member Assistant(s)/Consultant(s):** There were two modification proposals for the compensation of Board Consultants for Mayor Patricia Lock Dawson: Thomas Gross and Andrew Silva. There were 24 new contract proposals for all Board Members for FY 2025-2026 which is effective from July 1, 2025. For additional information, please refer to the [Webcast at 3:40](#).

Moved by Cacciotti; seconded by McCallon, unanimously approved.

Ayes: Cacciotti, Delgado, McCallon, Perez
Noes: None

10. **Establish Lists of Prequalified Contractors for Legal Services, and for Occupational Health and Medical Services; Authorize Contracts and Funding for Services; and Execute a Contract for Insurance Brokerage Services:** John Olvera, Deputy Executive Officer, Administrative & Human Resources, reported that this item is to implement the results of several RFPs and the evaluation of the proposals. The recommendation is to establish lists of pre-qualified providers for labor and employment legal services and for occupational health and medical services. This item also seeks approval to contract and fund contracts for providers on these lists for a three-year period with a two-year possible extension. The RFP for insurance brokerage services received one proposal from our current broker, Alliant Insurance Services. They were evaluated as qualified and so this item also seeks approval to enter into a three-year contract with them with a two-year possible extension. Costs for these contracts have been requested in next year's 2025-26 budget and will be requested in subsequent budgets. For additional information, please refer to the [Webcast at 21:18](#).

Moved by McCallon; seconded by Cacciotti, unanimously approved.

Ayes: Cacciotti, Delgado, McCallon, Perez
Noes: None

WRITTEN REPORT:

11. **Young Leaders Advisory Council Minutes for the February 19, 2025 Meeting:** The report was acknowledged and received.

OTHER MATTERS:

12. **Other Business:** There was no other business to report.

13. **Public Comment:** Dr. James Enstrom provided public comment regarding health effects in California and the Health Effects Officer position. Executive Officer Natri indicated that Dr. Nichole Quick is currently serving as a contracted Health Effects Officer. She is an MD and has a Master's degree in Public Health.

Ronald Edwards provided public comment, but General Counsel Gilchrist directed him to focus his comments on items on the Administrative Committee agenda. Mr. Edwards thanked the Board for their service.

Mr. Eder provided public comment that did not pertain to the Administrative Committee agenda.

For additional information, please refer to the [Webcast at 23:17](#).

14. **Next Meeting Date:** The next regular Administrative Committee meeting is scheduled for Friday, August 8, 2025 at 10:00 a.m.

Adjournment

The meeting was adjourned at 10:42 a.m.



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

YOUNG LEADERS ADVISORY COUNCIL WEDNESDAY, FEBRUARY 19, 2025 MEETING MINUTES

Members Present:

Gabriela Ballesteros
Emanuel De Jesús Cruz
Alexander Goytia Fajardo
Leslie Helen Garcia
Mark Jimenez
Shirley Mariel Rivera
Jordan Ashley Salcido
Linh Tran
Silvestre Lopez
Roxana Marina Barrera
Jose Marquez Cuevas
Heaven Denham
Vanessa Melesio
Jessica Santos
Joshua Scheel
Gilbert Sebastian Sanchez

Members Absent:

Jai Lin Alise Salas
Andres Coronel
Eric Tomas
Tai Nguyen

South Coast AQMD Staff:

Dr. Anissa Heard-Johnson, Deputy Executive Officer, Community, Engagement and Air Programs
Josephine Lee, Senior Deputy Counsel, Legal
Shahrzod Hanizavareh, Principal Deputy District Council
Tom Gross, Board Member Consultant to Mayor Lock Dawson

Dr. Alexis Thrower, Senior Public Affairs Specialist, Community, Engagement and Air Programs

Cassandra Johnson, Senior Public Affairs Specialist, Community, Engagement and Air Programs

Carolina Vargas, Staff Assistant, Community, Engagement and Air Programs

Heatherlynn Pomeroy, Senior Administrative Assistant, Community, Engagement and Air Programs

Paola Servas, Senior Office Assistant, Community, Engagement and Air Programs

Call To Order

Dr. Heard-Johnson called the meeting to order at 12:34 p.m.

Roll Call

Agenda Item #1: Staff Introductions and Agenda Overview

Dr. Heard-Johnson introduced herself and said we need the youth perspective now more than ever as it is critical to address any issue to work through education. Member skills and knowledge will help South Coast AQMD staff in their work. South Coast AQMD staff introduced themselves and their roles. Dr. Heard-Johnson went over the agenda items we are addressing for the day. For additional information, please refer to the [webcast](#) beginning 5:27.

Agenda Item #2: Overview of Community Engagement and Air Programs (CEAP)

Dr. Heard-Johnson gave a brief description of how the CEAP division came to be. Cessa is pleased there is still a commitment to our work in light of the current political climate. One of her roles is to increase the cultural competency of South Coast AQMD staff. For additional information please refer to the [webcast](#) beginning at 14:50.

Agenda Item #3: Introductions

YLAC Members gave a brief introduction of themselves and why they joined YLAC. For additional information please refer to the [webcast](#) beginning at 21:10.

Agenda Item #4: Review and Approve the Minutes

Motion: Dr. Heard-Johnson

Seconded: Emanuel Cruz

Roxana Barrera and Joshua Scheel requested amendments to the minutes related to the chart updates to clarify term limits. The Adjustment will be made to the minutes.

Motion: Gabriella Ballesteros

Seconded: Joshua Scheel

Unanimously Approved

Aye: Gabriela Ballesteros
Emanuel De Jesús Cruz
Alexander Goytia Fajardo
Leslie Helen Garcia
Mark Jimenez
Shirley Mariel Rivera
Jordan Ashley Salcido
Lihn Tran
Silvestre Lopez
Roxana Marina Barrera
Jose Marquez Cuevas
Heaven Denham
Vanessa Melesio
Jessica Santos
Joshua Scheel
Gilbert Sebastian Sanchez

Noes: None

Absent: Jai Lin Alise Salas
Andres Coronel
Eric Tomas
Tai Nguyen

For additional information please refer to the [webcast](#) at 35:14.

Agenda Item #5: Annual Report

Dr. Heard-Johnson provided an overview of the Annual Report. Lihn said she felt that YLAC members should be a part of giving the presentation to the Board. Dr. Heard Johnson said we would look into it. Emanuel De Jesús Cruz said he liked the mobile monitoring van. Leslie Garcia wanted to know about participating in past events from previous members. Vanessa Melesio talked about sharing events and some of the presentations from last year. Dr. Heard-Johnson will find out about being a part of the presentation or speaking about public comment.

Motion: Emanuel De Jesús Cruz
Second: Roxana Marina Barrera
Unanimously Approved

Aye: Gabriela Ballesteros
Emanuel De Jesús Cruz
Alexander Goytia Fajardo
Leslie Helen Garcia

Mark Jimenez
Shirley Mariel Rivera
Jordan Ashley Salcido
Lihn Tran
Silvestre Lopez
Roxana Marina Barrera
Jose Marquez Cuevas
Heaven Denham
Vanessa Melesio
Jessica Santos
Joshua Scheel
Gilbert Sebastian Sanchez

Noes: None

Absent: Jai Lin Alise Salas

Andres Coronel

Eric Tomas

Tai Nguyen

For additional information please refer to the [webcast](#) at 39:17.

Agenda Item #6: Brown Act Compliance

Ms. Hanizavareh gave the YLAC members a presentation of the Brown Act. Ms. Hanizavareh opened the floor for questions from YLAC members. There were no questions. For additional information please refer to the [webcast](#) at 49:13.

Agenda Item #7: 2024 Member Recognition

Dr. Heard-Johnson shared the following statement regarding the 2024 YLAC Members. “The mission of the Young Leaders Advisory Council of South Coast AQMD is to educate and engage young adults regarding the region’s clean air issues and to garner from them greater insight into their generation’s concerns, values and priorities about air quality to their peers and others.” and recognized the leadership and dedication of the YLAC members. For additional information please refer to the [webcast](#) at 01:16:03.

Agenda Item #8: Materials and Expense Claims

Cassandra Johnson gave an overview on *The Color of Law* by Richard Rothstein and *From the Inside Out* by Jill Lindsey Harrison. Heatherlynn Pomeroy talked about financial documents and expense claims members will need to complete for their stipends and mileage claims. Dr. Heard-Johnson said knowledge is power, reiterating the importance of sharing the resources. For additional information please refer to the [webcast](#) at 01:17:28.

Agenda Item #9: Community Spotlight

YLAC members made the following comments:

- Jessica Santos raised concerns about mistrust in air quality alerts during recent fires. She recommended clear, multilingual outreach and emphasized using empathy to connect with the public. She noted the value of YLAC as a tool for community empowerment and supported stronger university partnerships with South Coast AQMD.
- Heaven Denham shared that Riverside residents are concerned about pollution from transit and lead. She stressed the need for actionable information during air quality events and praised AQMD outreach booths. She encouraged mixing digital and traditional methods to engage the community.
- Lihn Tran shared that she gets information from her community and neighbors.
- Gabriella Ballesteros and Shirley Rivera said they rely on social media and local groups for their information.
- Roxana Barrera stressed using reliable sources like EJ journalists and reminded the group to fact-check before sharing online.
- Vanessa Melesio said social media can be useful for quick info and discussion. She promoted the People's History IE event at Cal State San Bernardino and encouraged members to contribute local insights. She also shared a public comment proposal.
- Gilbert Sanchez highlighted student sustainability projects, including a solar boat trip to Sacramento and the Solar Cup.

For additional information please refer to the [webcast](#) at 01:25:49.

Agenda Item #10: Goals and Requests for 2025

Dr. Heard-Johnson asked the members for goals and requests that they would like put in front of them for the 2025 year. Gabriella Ballesteros requested that Board members speak about their experience and the work they're doing. Vanessa Melesio requested Jonathan Pacheco Bell to speak about the practice of embedded planning in order to drive change. Lihn tabling and community outreach. Jessica Santos mentioned the possibility of a group service project or a talking points/tool kit. Ms. Santos also requested a possible speaker, Mark Lopez to talk about grassroots activism. For additional information please refer to the [webcast](#) at 01:50:49.

Agenda Item #11: Other Business

Heatherlynn Pomeroy spoke about the Governing Board Internship Program. Members were encouraged to apply to it and any open recruitment opportunities. For additional information please refer to the [webcast](#) at 01:58:00.

Agenda Item #12: Public Comment

No Public comment was given. For additional information please refer to the [webcast](#) at 01:59:40.

Agenda Item #13: Next Meeting Date

The next regular YLAC meeting is scheduled for Wednesday, May 21, 2025, at 12:30 p.m.

Adjournment

The meeting was adjourned the meeting at 2:31 p.m.

[↑ Back to Agenda](#)

BOARD MEETING DATE: August 1, 2025

AGENDA NO. 16

REPORT: Investment Oversight Committee

SYNOPSIS: The Investment Oversight Committee held a hybrid meeting on Friday, June 13, 2025. The following is a summary of the meeting.

RECOMMENDED ACTION:
Receive and file.

Michael A. Cacciotti, Committee Chair
Investment Oversight Committee

SJ:gp

Call to Order

Committee Chair Cacciotti called the meeting to order at 8:00 a.m.

Roll Call

Committee Members

Present: Vice Chair Michael A. Cacciotti, Committee Chair
Supervisor Curt Hagman
Vice Mayor Brenda Olmos
Board Member Veronica Padilla-Campos
Richard Dixon
Jill Whynot

Absent: Sarah Meacham

For additional details of the Investment Oversight Committee Meeting, please refer to the [Webcast](#).

DISCUSSION ITEMS:

1. *Quarterly Report of Investments*: Sujata Jain, Chief Financial Officer presented the quarterly investment report. For additional information please refer to the [Webcast at 3:33](#).

Committee Chair Cacciotti asked about reinvesting the U.S. Treasury Note funds that will be maturing in June and July 2025. Ms. Jain explained that she will work with internal divisions to determine if the money can be invested and if so, she will reach out to the Los Angeles County Treasurer about reinvesting the funds. For additional information please refer to the [Webcast at 4:30](#).

Supervisor Hagman asked Ms. Jain if she looks elsewhere for investments other than Los Angeles County. Ms. Jain talked about our investment policy with Los Angeles County. For additional information please refer to the [Webcast at 7:04](#).

2. *Cash Flow Forecast*: Ms. Jain reported on the cash flow for the current and next three years. For additional information please refer to the [Webcast at 8:30](#).
3. *Financial Market Update*: Robert Montoya, PFM Asset Management, gave the financial market update from the second quarter. Mr. Montoya discussed tariffs, unemployment, consumer price index, treasury yields, inflation trends, unemployment and consumer spending. For additional information please refer to the [Webcast at 9:35](#).

Vice Mayor Olmos asked Mr. Montoya about the timeline for any impact from the tariffs. Mr. Montoya explained that due to pauses in the tariffs it is difficult to predict. For additional information please refer to the [Webcast at 37:35](#).

Committee Chair Cacciotti asked about negative imports and the impact it may have on us. Mr. Montoya talked about the uncertainty of the tariffs and other contributing factors. For additional information please refer to the [Webcast at 39:48](#).

OTHER MATTERS:

4. **Other Business**

There was no other business to report.

5. **Public Comment Period**

There were no public comments to report.

6. **Next Meeting Date**

The next regular Investment Oversight Committee meeting is scheduled for Friday, September 12, 2025.

Adjournment

The meeting adjourned at 8:41 a.m.

[↑ Back to Agenda](#)

BOARD MEETING DATE: August 1, 2025

AGENDA NO. 17

REPORT: Legislative Committee

SYNOPSIS: The Legislative Committee held a hybrid meeting on Friday, June 13, 2025. The following is a summary of the meeting.

Receive and file this report and approve agenda items as specified in this letter.

Michael A. Cacciotti, Committee Chair
Legislative Committee

LTO:PFC:DPG:EV:MC

Call to Order

Committee Chair Michael Cacciotti called the meeting to order at 9:00 a.m.

Roll Call

Committee Members

Present: Vice Chair Michael A. Cacciotti, Committee Chair
Supervisor Curt Hagman
Vice Mayor Brenda Olmos
Supervisor V. Manuel Perez

Absent: Mayor Patricia Lock Dawson
Councilmember Nithya Raman

ACTION/DISCUSSION ITEMS:

1. Update and Discussion on State Legislation and South Coast AQMD Priorities

Lisa Tanaka, Deputy Executive Officer, Legislative Public Affairs and Media and Ross Buckley, Buckley Government Affairs, LLC, Paul Gonsalves, Joe A. Gonsalves & Son, and Alfredo Arredondo, Resolute, presented an Overview of State Legislative Issues including the Governor's proposed budget, legislative budget process, Cap and Trade Reauthorization, AB 617 program funding, and status of South Coast AQMD sponsored and position bills. For additional information, please refer to the [Webcast](#) beginning at 3:35.

Supervisor Hagman asked about the environment in Sacramento given the challenges California is facing from federal actions and policies. Mr. Gonsalves responded that policymakers in Sacramento are feeling bullied by the federal government but are not backing down or adjusting their policy priorities in response. Mr. Buckley commented that state policymakers are also focused on increasing affordability for state residents given rising prices. Mr. Arredondo mentioned that some of California's response to harmful federal actions will be adjudicated through the court system.

Supervisor Perez inquired about SB 34 (Richardson) and the impact on South Coast AQMD if AB 617 program funding were to be eliminated. Ms. Tanaka provided details regarding SB 34. Executive Officer Wayne Natri, responded that the AB 617 program does not receive continuous funding and staff advocates for annual incentive and implementation funding each legislative session. Susan Nakamura, Chief Operating Officer, added that South Coast AQMD receives approximately \$21 million annually for program implementation and there are a total of 90 positions dedicated to the program. The rainy-day fund in the budget is approximately 40 percent. Supervisor Perez recommended that the rainy-day fund not go lower than 20 percent.

Moses Huerta provided public comment in support of the AB 617 program.

For additional information, please refer to the [Webcast](#) beginning at 03:23.

WRITTEN REPORTS/ DISCUSSION ITEMS:

2. Update and Discussion on Federal Legislative Issues

South Coast AQMD's federal legislative consultants (Carmen Group, Cassidy & Associates, and Kadesh & Associates) provided written reports on key Washington, D.C. issues.

Gary Hoitsma, Carmen Group, informed the committee that it is a federal priority to work on Surface Transportation Reauthorization later this year, since the current program expires on September 30, 2026. For additional information, please refer to the [Webcast](#) beginning at 1:00:16.

Lio Barrera, Cassidy & Associates, provided an update on the Fiscal Year 2025 Budget Reconciliation Bill, H.R. 1, "One Big Beautiful Bill." For additional information, please refer to the [Webcast](#) beginning at 1:01:03.

Mark Kadesh, Kadesh & Associates, gave a status report on Fiscal Year 2026 Appropriations bills. Government funding expires on September 30, 2025. For additional information, please refer to the [Webcast](#) beginning at 1:01:40.

Harvey Eder provided public comment regarding energy and the environment.

3. Update and Discussion on State Legislative Issues

South Coast AQMD's state legislative consultants (Resolute, Buckley Government Affairs, LLC, and Joe A. Gonsalves & Son) provided written reports on key issues in Sacramento.

David Quintana, Resolute, reported that Senator Monique Limon is the Senate President Pro Tem-elect. She will assume the position in early 2026. For additional information, please refer to the [Webcast](#) beginning at 1:04:31.

Ross Buckley, Buckley Government Affairs, LLC, reported that Governor Newsom signed an Executive Order affirming the state's commitment to clean vehicles following federal actions to roll back the California Waivers for cars and trucks. For additional information, please refer to the [Webcast](#) beginning at 1:04:52.

Paul Gonsalves, Joe A. Gonsalves & Son, reported that the Assembly passed the state's budget bill, SB 101. The budget bill will next head to the Senate for consideration. For additional information, please refer to the [Webcast](#) beginning at 1:05:27.

Mr. Eder provided public comment regarding socio-economic equity.

OTHER MATTERS:

4. Other Business

There was no other business to report.

5. Public Comment Period

Mr. Eder provided a comment not related to this committee.

6. Next Meeting Date

The next regular Legislative Committee meeting is scheduled for Friday, August 8, 2025, at 9:00 a.m.

Adjournment

The meeting was adjourned at 10:07a.m.

Attachments

1. Attendance Record
2. Update on Federal Legislative Issues – Written Reports
3. Update on State Legislative Issues – Written Reports

ATTACHMENT 1

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT LEGISLATIVE COMMITTEE MEETING ATTENDANCE RECORD – JUNE 13, 2025

| | |
|---------------------------------------|---------------------------------------|
| Councilmember Michael Cacciotti | South Coast AQMD Board Member |
| Supervisor Curt Hagman | South Coast AQMD Board Member |
| Vice Mayor Brenda Olmos | South Coast AQMD Board Member |
| Supervisor V. Manuel Perez | South Coast AQMD Board Member |
| | |
| Guillermo Gonzalez | Board Consultant (Perez) |
| Katherine Kolcheva | Board Consultant (Hagman) |
| Debra Mendelsohn | Board Consultant (McCallon/Rodriguez) |
| Diane Nguyen | Board Consultant (Nguyen) |
| Marisela Santana | Board Consultant (Olmos) |
| Ben Wong | Board Consultant (Cacciotti) |
| | |
| Ross Buckley | Buckley Government Affairs, LLC |
| Gary Hoitsma | Carmen Group, Inc. |
| Lio Barrera..... | Cassidy & Associates |
| Paul Gonsalves | Joe A. Gonsalves & Son |
| Ben Miller..... | Kadesh & Associates |
| Alfredo Arredondo | Resolute |
| David Quintana | Resolute |
| | |
| Harvey Eder | Public Member |
| Grace Garner..... | Public Member |
| Moses Huerta..... | Public Member |
| Peter Okurowski..... | Public Member |
| Bill Quin..... | Public Member |
| Peter Whittingham | Public Member |
| | |
| Jason Aspell | South Coast AQMD Staff |
| Barbara Baird | South Coast AQMD Staff |
| Cindy Bustillos | South Coast AQMD Staff |
| Lara Brown..... | South Coast AQMD Staff |
| Matthew Ceja | South Coast AQMD Staff |
| Maria Corralejo..... | South Coast AQMD Staff |
| Philip Crabbe | South Coast AQMD Staff |
| Scott Gallegos | South Coast AQMD Staff |
| Denise Gailey | South Coast AQMD Staff |
| Bayron Gilchrist | South Coast AQMD Staff |
| De Groeneveld..... | South Coast AQMD Staff |
| Alex Han | South Coast AQMD Staff |
| Sheri Hanizavareh | South Coast AQMD Staff |
| Anissa Cessa Heard-Johnson..... | South Coast AQMD Staff |
| Aaron Katzenstein | South Coast AQMD Staff |
| Roupen Karakouzian | South Coast AQMD Staff |
| Angela Kim..... | South Coast AQMD Staff |
| Howard Lee | South Coast AQMD Staff |
| Jocelyn Lee | South Coast AQMD Staff |
| Alicia Lizarraga | South Coast AQMD Staff |
| Brisa Lopez | South Coast AQMD Staff |

Jason Low South Coast AQMD Staff
Terrence Mann South Coast AQMD Staff
Ian MacMillan South Coast AQMD Staff
Ron Moskowitz South Coast AQMD Staff
Susan Nakamura South Coast AQMD Staff
Robert Paud South Coast AQMD Staff
Metzli Perez South Coast AQMD Staff
Sarah Rees South Coast AQMD Staff
Lisa Tanaka South Coast AQMD Staff
Melina Tisopulos South Coast AQMD Staff
Mei Wang South Coast AQMD Staff
Victor Yip..... South Coast AQMD Staff



Carmen Group
I N C O R P O R A T E D

ATTACHMENT 2A

To: South Coast AQMD Legislative Committee

From: Carmen Group

Date: May 27, 2025

Re: Federal Update -- Executive Branch

California Waivers: In May, at the request of the Environmental Protection Agency, the U.S. Senate joined the House of Representatives in passing three Congressional Review Act (CRA) resolutions of disapproval overturning the Biden EPA's granting of waivers for California's Advanced Clean Cars II, Advanced Clean Trucks, and Heavy-Duty Low-NOx rules.

Reconciliation: In May, the House of Representatives approved its version of President Trump's "One Big Beautiful Bill" reconciliation package, encompassing tax cuts, new spending for border, military and other priorities. Along with major spending reductions in other programs including many associated with the clean energy provisions of the Inflation Reduction Act. Now the Senate will take up the same bill while making significant changes with a goal to get its version passed by July 4, 2025.

Environmental Protection Agency (EPA)

EPA Announces HQs Office Restructuring: In May, the EPA announced a series of organizational and efficiency changes affecting five major offices within the agency, including shifts within the Office of the Administrator, the Office of Air and Radiation (OAR), the Office of Chemical Safety and Pollution Prevention (OCSPP), the Office of Water, and the Office of Research and Development (R&D). Highlights include integrating scientific staff directly into the program offices; creating a new Office of Applied Science and Environmental Solutions within the Administrator's Office; bringing more than 130 scientific and technical experts into the OSCPP to address backlogs of chemical and pesticide reviews; and creating two new offices within OAR—the Office of State Air Partnerships to improve coordination with state and local agencies and the Office of Clean Air Programs to align statutory obligations and essential functions promoting greater regulatory transparency.

EPA Allows for Nationwide Year-Round E15: In May, the EPA issued an emergency fuel waiver under the Clean Air Act allowing for the sale of E15 gasoline – gasoline blended with 15% ethanol – on a nationwide basis. The agency says it expects to extend waiver as long as needed to address unusual fuel supply circumstances.

EPA Seeks to Reconstitute Science Advisory Panels: In May, the EPA formally solicited nominations for memberships on the agency's Scientific Advisory Board (SAB),

Proven Process. Proven Results.™

901 F Street, NW Suite 600 Washington, DC 20004 T 202.785.0500 F 202.478.1734 carmengroup.com

the SAB’s standing committees, and the EPA’s Clean Air Scientific Advisory Committee (CASAC).

Department of Energy (DOE)

DOE Announces Changes to Upgrade US Energy Infrastructure: In May, the DOE announced Headquarters organizational changes it says are needed to help ensure that America can stay in front of the global race for AI leadership. With AI being dependent on hugely increased energy supplies and infrastructure, DOE is creating a new Office of Cybersecurity, Energy Security, and Energy Response (CESER) to be headed by current DOE chief of staff Alex Fitzsimmons, who served at DOE in the first Trump administration and has a Master of Science in Cybersecurity from Georgia Tech. Meanwhile, Carl Coe will take over as Chief of Staff, having led the Department of Government Efficiency (DOGE) effort at DOE, working closely with 40 offices there.

DOE Proposes Major Deregulatory Push: In May, the DOE proposed the elimination or modification of 47 regulations including dozens of consumer appliance standards, rules limiting building and energy production, and unscientific DEI requirements for grant recipients. These actions affected a variety of things such as natural gas exports, electric transmission facilities, greenhouse gas requirements, grant programs for schools and hospitals, federal building codes, and numerous consumer products such as ice makers, microwave and conventional ovens, faucets, showerheads, dishwashers, and washers and dryers, among many others.

Department of Transportation (DOT)

DOT Announces Funds Available for Bus Grants: In May, the Federal Transit Administration announced that \$1.5 billion is being made available for the latest round of grants under the Bus and Bus Facilities Program and the Low or No Emission Bus Program. The Department notes that this year’s Notice of Funding Opportunity (NOFO) strips requirements related to climate change, sustainability, environmental justice, and diversity-equity-and-inclusion as applied under the previous administration. Information webinar scheduled June 4. Applications due July 14, 2025.

DOT Moves Ahead with New CAFÉ Rule: On May 19, DOT Secretary Sean Duffy announced that the National Highway Traffic Safety Administration (NHTSA) recently submitted a new interpretive rule, “Resetting the Corporate Average Fuel Economy Program (CAFÉ)” to the Office of Management and Budget for review.

DOT Responds to Lawsuit on EV Charger Program: In May, DOT asserted that the Department is properly reviewing the National Electric Vehicle Infrastructure (NEVI) Formula Program and plans to issue new guidance to states under authority granted to the Department by the Congress. Meantime no new obligations may occur under the program, but reimbursements of existing obligations will continue. The halt in new obligations is currently being challenged in federal court by 16 states.

Outreach: During May, Carmen Group was in touch with committee staff and business group representatives on issues including the California waivers, the federal budget, appropriations and reconciliation.

###

ATTACHMENT 2B



To: South Coast Air Quality Management District
From: Cassidy & Associates
Date: May 27, 2025
Re: May Report

HOUSE/SENATE

Congress

The House and Senate are in recess this week. Before leaving town, the House passed its version of the reconciliation bill by a vote of 215 to 214, largely along party lines. The bill passed after multiple late nights of Committee activity and concessions to hardline conservatives. The bill now heads to the Senate, where additional changes are expected, before returning to the House for a vote on final passage. The President and the Speaker of the House continue to push a July 4 deadline.

The Senate voted to overturn three California Clean Air Act waivers under the Congressional Review Act (CRA) process, despite determinations by the Government Accountability Office (GAO) and the Senate Parliamentarian that the waivers could not be overturned by Congress. The House passed the disapproval resolutions earlier this month, and the President is expected to sign them into law. The waivers allowed California to set stricter air quality standards for vehicle emissions.

The House and Senate are focused on Fiscal Year (FY) 2026 appropriations following President Trump's release of his FY26 proposal on discretionary funding levels. The budget proposal broadly outlined a nearly 55% reduction in funding levels for the Environmental Protection Agency (EPA), including deep cuts to the Office of Research and Development and the elimination of Diesel Emissions Reduction Act Grants and the Atmospheric Protection Program.

EPA

In May, Administrator of the Environmental Protection Agency (EPA) Lee Zeldin testified in front of four Congressional Committees on the EPA's FY26 budget – the House and Senate Appropriations Committees, the House Energy and Commerce Committee, and the Senate Environment and Public Works Committee. He discussed the EPA's shift in focus to cooperative federalism and reducing regulatory burdens, as well as the historic wildfire cleanup in California and the prioritization of efforts to combat PFAS. Lawmakers questioned him about frozen and terminated grants, the agency's reorganization and reduction in staffing, and the elimination of the Greenhouse Gas Reduction Fund. Republican lawmakers praised the agency's efforts to rollback Biden-era regulations and reorient the agency around the priorities of the Trump Administration.

On May 12, it was reported that the EPA did not publish the U.S. Greenhouse Gas Emissions and Sink Inventory report, which is mandated by the United Nations Framework Convention on Climate Change. The Environmental Defense Fund, an environmental non-profit organization, filed a Freedom of Information Act request and [published it online](#) last week. The report demonstrates that the U.S. is making progress to reduce greenhouse gas emissions, but not at a rate sufficient to reach the 2035 reduction targets published by the U.S. last year. According to the report, gross greenhouse gas emissions in 2023 saw a 17% reduction from 2005 levels. Read more [here](#).

On May 12, it was reported that scientists at EPA's Office of Research and Development (ORD) were told by political leaders to apply to openings in other offices. This follows announcements obtained from internal emails that ORD is "shutting down their laboratory activities" and that scientific expertise would be shifted to program offices. The agency has said that this phase in reorganization efforts does not include layoffs, but the goal is to reduce staffing to Reagan-era levels. Read more [here](#).

On May 5, the Environmental Protection Agency (EPA) officials reportedly announced in a staff meeting that divisions overseeing climate change and energy efficiency would be eliminated in restructuring efforts, which include the Office of Atmospheric Protection that administers the Energy Star program. The program, which provides certification for energy-efficient appliances, was first launched in 1992. Critics argue that cutting the Energy Star program is counterproductive to lowering household energy costs and addressing the nation's energy challenges as demand for electricity surges. Although previous attempts by the Trump Administration to defund the program were met with bipartisan resistance, the restructuring

aligns with President Trump's 2026 budget to reduce funding for environmental programs. Read more [here](#).

Cassidy and Associates support in May:

- Advised AQMD staff on the repeal of the California Clean Air Waivers
- Provided background on ongoing tax and rescission legislation impacting AQMD priorities
- Worked with AQMD staff to strategize on future DC outreach and plan for DC visits.
- Advised AQMD throughout the appropriations cycle to identify and pursue funding opportunities.
- Participated in weekly strategy sessions with SCAQMD staff

IMPORTANT LEGISLATIVE DATES

September 30, 2025: Deadline to fund the federal government.

September 30, 2025: The Farm Bill, an omnibus package of legislation that supports US agriculture and food industries, expired in 2023. The bill is reauthorized on a five-year cycle.

December 31, 2025: National Defense Authorization Act, which authorizes and funds specialized Department of Defense (DoD) programs and sets the DoD's policy agenda each year.

ATTACHMENT 2C

KADESH & ASSOCIATES

South Coast AQMD Report for the June 2025
Legislative Meeting covering May 2025
Kadesh & Associates

May was a very busy month in Congress, with consequential votes on several issues of importance to the South Coast AQMD. The two most important: the House of Representatives approved its budget reconciliation bill, and both the House and Senate approved three Congressional Review Act resolutions in an attempt to block Clean Air Act waivers granted to the California Air Resources Board (CARB).

The passage of the House's budget reconciliation bill, with many committee meetings lasting well into the night: the House Energy and Commerce Committee (with jurisdiction over the EPA and DOE) met for more than 24 hours on their portion of the bill, and the Ways & Means Committee spent more than 17 hours debating the tax provisions. The House Rules Committee set an unusual start time for its debate -- 1:00 a.m. on Wednesday morning -- and did not conclude until after 10:30 p.m. With late-breaking concessions and persuasion, the bill passed the House by a party-line vote of 215-214. The bill now heads to the Senate, where Majority Leader Thune will need to walk the same balancing act as Speaker Johnson: finding a bill that can satisfy both those in his party who want deeper cuts and those who want to protect specific programs.

The House-passed bill includes an extension of the 2017 tax cuts, increased funding for the military and border security, changes to the Medicaid and SNAP programs, an increase in the federal debt limit, and repeals of tax incentives for EVs and renewables. The bill would also rescind unobligated funds from the EPA clean air programs created by the Inflation Reduction Act, including: the Clean Heavy Duty Vehicles program and the Clean Ports program, funding for DERA and air monitoring grants, and environmental and climate justice grants. Note that once a federal agency has awarded a contract, the funds are generally considered obligated.

The House and Senate also voted to block implementation of several CARB rules, using the Congressional Review Act (CRA) process to "disapprove" three Clean Air Act waivers previously granted by EPA (on Advanced Clean Cars II, Advanced Clean Trucks and Heavy-Duty Engine and Vehicle Omnibus). This CRA debate has been extremely contentious, and Senators Padilla and Schiff argued strenuously that this was an unprecedented move that goes beyond the scope of the Senate's power; prior to this year, EPA and Congress have never treated California waivers as subject to the CRA.

Kadesh & Associates Activity Summary-

-Worked with South Coast AQMD and the congressional delegation on funding implications of Executive Orders and agency directives, as well as reconciliation and California waivers.

Contacts: Contacts included staff and Members throughout the CA delegation, Senate offices, and members of key committees.

South Coast Air Quality Management District Legislative and Regulatory Update -May 2025

❖ Important Upcoming Dates

June 06, 2025 – House of Origin Deadline
June 15, 2025 – Budget Bill Must be Passed by Midnight

❖ RESOLUTE Actions on Behalf of South Coast AQMD. RESOLUTE partners David Quintana, and Alfredo Arredondo continued their representation of South Coast AQMD before the State's Legislative and Executive branches. Selected highlights of our recent advocacy include:

- Provided ongoing updates as the policy committees have been hearing bills.
- Followed up on bills for the 2025 legislative session, including for South Coast AQMD sponsored legislation.
- Arranged meetings with key legislators on behalf of South Coast AQMD.

❖ AB 907 (Chen). Assemblymember Philip Chen has introduced AB 907, sponsored legislation for South Coast AQMD, dealing with the inequity of pay for air district board members appointed to serve on the CA Air Resources Board.

AB 907 was heard in Assembly Appropriations Committee on May 23rd and passed:

Ayes: 14
Noes: 0
Abstained: 1

The bill will now have a final vote on the Assembly floor to determine if it will move on to the Senate.

❖ AB 1106 (Rodriguez). Assemblymember Michelle Rodriguez introduced AB 1106, sponsored by South Coast AQMD, which would establish air quality incident response centers to support response to crises impacting air quality and public health in Southern, Central and Northern California. The centers would provide technical and communications infrastructure to support emergency response including, but not limited to, air monitoring, data collection and analysis, publishing data, integration into Unified Command and/or Joint Information Center, and other related activities. The bill would require funding to plan, construct, and equip the centers as well as for on-going administration and operation of the centers to support readiness and implementation during crises.

AB 1106 was heard in Assembly Appropriations Committee on May 23 and was held on the suspense file. AB 1106 will not move forward.

ATTACHMENT 3B

South Coast AQMD, Legislative Committee Report
Buckley Government Affairs LLC
June 13, 2025

Legislative Session Update

On Friday, May 23, the Senate and Assembly Appropriations Committees held their all-important "suspense file" hearings, where they determined the fate of hundreds of bills with significant fiscal impacts. These hearings are a critical step in the legislative process, as they decide which bills will advance to the floor and which will be held due to budgetary concerns.

This year's hearings were particularly noteworthy as they came just one week after the Governor released the May Revise, which highlighted the state's ongoing budget deficit. As a result, there was heightened speculation that more bills would be held in committee due to cost pressures.

In the Assembly, 666 bills were considered, with 435 measures advancing to the Assembly Floor and 231 bills held in committee. In the Senate, 432 bills were heard, with 307 advancing and 125 being held. A very small number of the held bills were converted into "two-year bills," allowing them to be reconsidered in the 2026 legislative session. Despite concerns about the fiscal outlook, the number of bills held this year represents only a marginal increase compared to last year.

Finally, June 6th is the last day for each house to pass bills introduced in that house. The "House of Origin" deadline marks the half-way point in the Legislative calendar. There will be a rush of policy and budget committees occurring throughout June.

Budget Update

On May 14th, Governor Newsom held a press conference to unveil his May Revise budget proposal. The Governor is currently estimating a projected \$11.9 billion budget shortfall for the upcoming fiscal year, largely driven by a \$16 billion anticipated downturn over the next two years, which he attributed to the so-called "Trump Slump." This includes reductions in capital

gains, corporate profits, and personal income tax collections. While revenues have come in \$7.9 billion above January projections, the broader economic outlook remains volatile.

The May Revise outlines a total budget of \$321.9 billion, including \$226.4 billion in General Fund spending and \$15.7 billion in total reserves. To address the projected shortfall, the Administration is proposing a mix of solutions totaling approximately \$12 billion. This includes \$5 billion in program reductions and savings, \$5.3 billion would be addressed through borrowing and revenue transfers, and \$1.7 billion would be a fund shift of CalFire operations to the Greenhouse Gas Reduction Fund (GGRF).

The fund shift of CalFire operations represents a significant change in how GGRF money has been used in the past. This reallocation could put substantial pressure on other GGRF-funded programs, including the AB 617 program and other air quality initiatives. We will continue to monitor the implications for specific programs and funding lines as more details become available. The Legislature must pass a balanced budget by June 15th.

ATTACHMENT 3C



Joe A. Gonsalves & Son

Anthony D. Gonsalves

Jason A. Gonsalves

Paul A. Gonsalves

PROFESSIONAL LEGISLATIVE REPRESENTATION

925 L ST. · SUITE 250 · SACRAMENTO, CA 95814-5766

916 441-8597 · FAX 916 441-5061

Email: gonsalves@gonsalvi.com

TO: South Coast Air Quality Management District

FROM: Anthony, Jason & Paul Gonsalves

SUBJECT: Legislative Update – May 2025

DATE: Tuesday, May 27, 2025

The month of May is occupied by the Governor’s May Revise and the deadline for bills that would cost the state money to pass out of the Appropriations Committees. Any bill costing the state more than \$150,000 are at risk of being held “on suspense” and dying. In a year where the Governor and Legislature are facing a multi-billion-dollar deficit with larger shortfalls potentially being delivered from Washington D.C., more bills than normal would be held on suspense. That was not the case. Of the 1,098 measures on suspense, only 32% died. This is roughly consistent with the number of bills held at this time last year.

On May 14, 2025, Governor Gavin Newsom released the May Revision of the 2025–26 California state budget. The revised budget addresses a projected \$11.95 billion shortfall, largely attributed to a combination of federal policy impacts including tariffs, market instability, and reduced international tourism, which together have led to an estimated \$16 billion decline in state revenues.

The following will provide you with updates of interest to the District:

COMMUNITY AIR GRANTS

On May 6, 2025, the California Air Resources Board (CARB) announced a record-breaking \$20.9 million in Community Air Grants, funding 51 projects across the state, more than doubling previous award cycles. This unprecedented investment supports 43 nonprofit organizations and four California Native American Tribes in advancing community-led air quality initiatives. The grants, funded by California’s Cap-and-Trade Program, aim to build local capacity for air monitoring and pollution reduction in the state’s most environmentally burdened communities, including those in Sacramento, Los Angeles, the Central Valley, San Diego, the Bay Area, and the Imperial Valley.

Now in its fifth funding cycle, the Community Air Grants program plays a critical role in California’s broader environmental justice strategy by empowering residents to take an

active role in identifying and mitigating local sources of air pollution. As part of CARB's updated Blueprint 2.0, the program is expanding to reach more communities that have consistently sought air quality support. This latest round of grants reflects CARB's ongoing commitment to equity, inclusion, and public health, and is a key component of California Climate Investments, a statewide initiative using Cap-and-Trade dollars to reduce greenhouse gas emissions, strengthen the economy, and improve quality of life, particularly in underserved areas.

MAY REVISE

On May 14, 2025, Governor Newsom unveiled his May Revision proposal for the 2025–26 California state budget, outlining a strategic plan aimed at securing the state's long-term prosperity amid ongoing economic headwinds. Facing a projected \$11.95 billion deficit, driven in part by a \$16 billion revenue decline attributed to federal instability, including tariff disruptions, market volatility, and decreased international tourism, the revised budget emphasizes fiscal responsibility while maintaining bold investments in housing, education, and infrastructure. The Governor is also proposing a legislative package to streamline permitting and expedite housing development, including aligning Coastal Commission timelines, promoting infill and transit-oriented projects, and supporting CEQA reforms. Additionally, the proposal includes a housing and infrastructure bond to accelerate the pace of development statewide.

The May Revision also tackles rising healthcare costs by targeting prescription drug middlemen and increasing oversight of Pharmacy Benefit Managers (PBMs) to reduce costs and protect access to essential medications, including abortion pills. CalRx's expanded authority will further shield Californians from politically driven supply threats. As climate change intensifies, the budget accelerates the modernization of the State Water Project via the Delta Conveyance, aiming to secure water supplies for 27 million residents. The proposal continues transformative educational investments, funding universal transitional kindergarten, free school meals, expanded learning programs, and \$545 million for literacy efforts with a focus on multilingual learners. It also features historic emergency response funding, a tax cut for military retirees, and the creation of a new agency to streamline housing and homelessness programs. Through California's Cap-and-Invest initiative, the state will continue funding major climate efforts while delivering up to \$60 billion in utility credits through 2045.

ZEV SALES HOLD STEADY IN 2025

On May 16, 2025, the California Energy Commission announced that during the first quarter of 2025, Californians purchased 100,326 zero-emission vehicles (ZEVs), accounting for 23% of all new vehicle sales in the state. While this represents a slight decline from the record-breaking Q1 sales in 2024, California still surpassed a major milestone last year by exceeding 2 million total ZEVs sold. The modest decrease in overall ZEV sales was largely attributed to a 21.5% year-over-year drop in Tesla registrations. However, this was offset in part by a 14% increase in registrations of non-Tesla electric vehicles, reflecting a diversifying market.

California's EV landscape continues to expand, with 147 electric vehicle models available in Q1 2025 (up from 105 the year prior) giving consumers more options and confidence in the state's growing charging infrastructure. California remains the national leader in ZEV adoption, accounting for over 30% of all ZEVs sold in the U.S., according to the California Air Resources Board (CARB). Despite the dip in California, EV sales nationwide rose by 11.4% in Q1 2025, and the used EV market saw strong momentum as well, with Carvana reporting a 182% year-over-year increase in used EV sales in 2024.

SALTON SEA

On May 22, 2025, Governor Newsom announced a key restoration achievement at the Salton Sea with the filling of the East Pond Expansion, an effort aimed at reviving habitats lost due to increasing salinity and water depletion. This development is part of the broader Species Conservation Habitat Project, which falls under California's 10-year plan to restore the Salton Sea's ecosystem. The project is designed to create sustainable environments for local wildlife while also addressing regional air quality issues by minimizing dust emissions from the exposed lakebed.

As California's largest inland lake, the Salton Sea has experienced significant shrinkage in recent years due to decreased water inflows, leading to heightened salinity and environmental degradation. These changes have jeopardized habitats vital to migratory birds along the Pacific flyway and worsened air quality in the Imperial Valley.

Governor Newsom has prioritized major restoration efforts at the Salton Sea, with the Species Conservation Habitat Project expanding from an initially planned 4,100 acres to over twice that size, thanks in part to \$245 million in additional federal funding.

AFFORDABLE CLEAN CARS COALITION

On May 23, 2025, Governor Newsom announced that California has joined an 11-state coalition dedicated to promoting clean and affordable vehicles, following an attempt by the U.S. Senate to revoke California's authority to set its own clean air standards. The newly formed Affordable Clean Cars Coalition, led by the U.S. Climate Alliance, aims to accelerate the nation's shift to cleaner transportation, support American automotive jobs, and uphold states' rights to enforce stronger air quality protections.

The coalition includes California, Colorado, Delaware, Massachusetts, Maryland, New Jersey, New Mexico, New York, Oregon, Rhode Island, and Washington. These states will collaborate on strategies to lower costs, expand consumer options, and improve access to charging and fueling infrastructure for clean vehicles. In addition, they will work to protect their rights under the Clean Air Act and explore the development of future vehicle standards. The U.S. Climate Alliance, which leads this effort, is a bipartisan group of 24 governors representing around 60% of the national economy and 55% of the U.S. population.

2025 LEGISLATIVE DEADLINES

June 2-6: Floor Session only. No committee may meet for any purpose except Rules Committee, bills referred pursuant to A.R. 77.2, and Conference Committees

June 6: Last day for each house to pass bills introduced in that house

June 9: Committee meetings may resume

June 15: Budget bill must be passed by midnight

July 18: Last day for policy committees to hear and report bills

Aug. 29: Last day for fiscal committees to hear and report bills to the Floor

Sept. 2-12: Floor session only. No committees may meet for any purpose, except Rules Committee, bills referred pursuant to Assembly Rule 77.2, and Conference Committees

Sept. 5: Last day to amend on the Floor

Sept. 12: Last day for each house to pass bills. Interim Recess begins upon adjournment

[↑ Back to Agenda](#)

BOARD MEETING DATE: August 1, 2025

AGENDA NO. 18

REPORT: Mobile Source Committee

SYNOPSIS: The Mobile Source Committee held a hybrid meeting on Friday, June 20, 2025. The following is a summary of the meeting.

RECOMMENDED ACTION:
Receive and file.

Chair Vanessa Delgado, Committee Chair
Mobile Source Committee

SLR:ja

Call to Order

Chair Delgado called the meeting to order at 9:00 a.m.

Roll Call

Committee Members

Present: Chair Vanessa Delgado, Committee Chair
Mayor Pro Tem Larry McCallon
Mayor Pro Tem Carlos Rodriguez

Absent: Supervisor Holly J. Mitchell, Committee Vice Chair
Supervisor V. Manuel Perez
Councilmember Nithya Raman

For additional details, please refer to the [Webcast](#).

INFORMATIONAL ITEMS (Items 1-2):

1. Update on Proposed Rule 2304 – Commercial Marine Ports

Ian MacMillan, Assistant Deputy Executive Officer, Planning, Rule Development and Implementation, provided an update on Proposed Rule 2304. For additional details, please refer to the [Webcast](#) beginning at 00:02:42.

Mayor Pro Tem Rodriguez inquired about updates on the utilities' energy capacity forecasting to support PR 2304. Mr. MacMillan replied that the utilities will be presenting to the committee this year on their energy capacity planning efforts.

Chair Delgado also commented that the goal of PR 2304 is to assess energy capacity at the Ports and utilities' ability to provide the capacity is critical.

Mayor Pro Tem McCallon inquired if the infrastructure plan development involves utilities and requires their approvals. Mr. MacMillan responded that PR 2304 does not apply to utilities, but Ports are expected to coordinate with utilities for infrastructure planning. For additional details, please refer to [Webcast](#) beginning at 00:20:00.

There were eight public comments, five supported the proposed rule, and three expressed concerns with the proposed rule.

The following commenters supported adoption of the proposed rule, emphasizing the importance of public health and requesting additional references to emission reductions, more opportunities for community input during rule implementation, and inclusion of aggressive timelines in the proposed rule.

Chris Chavez, Coalition for Clean Air

Fernando Gaytan, Earthjustice

Fernando Marquez Duarte, People's Collective for Environmental Justice

Cristhian Tapia, Pacific Environment

Yassi Kavezade, T.H.E. Impact Project

For additional details, please refer to the [Webcast](#) beginning at 00:28:21.

Thomas Jelenic, Pacific Merchant Shipping Association, requested that staff hold community meetings in hybrid format and expressed concern about the potential complex process of CEQA and associated timelines in the proposed rule. For additional details, please refer to the [Webcast](#) beginning at 00:30:20.

The following commenters also expressed similar comments as Mr. Jelenic, requesting sufficient time for consideration of staff's responses to comments, and expressed support for an agreement approach instead of a rule.

Artie Mandel, Port of Los Angeles

Eleanor Torres, Port of Long Beach

For additional details, please refer to the [Webcast](#) beginning at 00:33:35. Chair Delgado, Mayor Pro Tem Rodriguez, and Mayor Pro Tem McCallon requested that staff hold community meetings in hybrid format.

Mayor Pro Tem McCallon inquired whether PR 2304 would incorporate in its timeline the CEQA process. Mr. MacMillan responded that PR 2304 does incorporate time to conduct CEQA, and requires annual reporting to verify compliance. Executive Officer Nastri and Barbara Baird, Chief Deputy Counsel, added that enforcement will follow similar processes for noncompliance with other rules pursuant to the California Health and Safety Code. Executive Officer Nastri also commented that staff is equipped to implement the proposed rule and ensure port infrastructure development moves forward. For additional details, please refer to [Webcast](#) beginning at 00:51:35.

2. Update on AB 2766 Annual Report

Lane Garcia, Program Supervisor, Planning, Rule Development and Implementation, provided an update on the AB 2766 Annual Report. For additional details, please refer to the [Webcast](#) beginning at 00:58:56.

Mayor Pro Tem McCallon asked what a typical land use project is. Staff explained that the category can be used to describe land-use planning and guideline development but also includes the construction of pedestrian facilities and provided some recent project examples. For additional details, please refer to the [Webcast](#) beginning at 01:07:10.

Harvey Eder, Public Solar Power Coalition, commented on infrastructure and solar projects and the process of CEQA and project guidance.

Mayor Pro Tem Rodriguez asked if we have a set of best practices for the jurisdictions regarding project cost-effectiveness. Mr. Garcia explained that staff guides cities towards cost effective projects, and that cost effectiveness is not a requirement for the program but a recommendation. Staff provided an example of how long-term projects, such as building pedestrian or bicycle infrastructure might not show immediate large-scale emissions reductions compared to shorter term projects but can lead to behavior changes that do reduce emissions over the long term. Mayor Pro Tem Rodriguez commented that he would be interested in seeing guidance materials offline so that he can provide them to the Orange County Council of Government jurisdictions.

WRITTEN REPORTS (Items 3-5):

3. Rule 2305 Implementation Status Report: Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program

This item was received and filed.

4. Rule 2202 Activity Report: Rule 2202 Summary Status Report

This item was received and filed.

5. Intergovernmental Review of Environmental Documents and CEQA Lead Agency Projects

This item was received and filed.

OTHER MATTERS:

6. Other Business

There was no other business to report.

7. Public Comment Period

Mr. Eder referred to a study that there has been an increase in Carbon Dioxide and Nitrous Oxide over the last 12 years and expressed support for the use of Solar Technology. For additional details, please refer to the [Webcast](#) beginning at 01:15:21.

8. Next Meeting Date

The next regular Mobile Source Committee meeting is scheduled for Friday, August 15, 2025 at 9:00 a.m.

Adjournment

The meeting adjourned at 10:25 a.m.

Attachments

1. Attendance Record
2. Rule 2305 Implementation Status Report: Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program
3. Rule 2202 Activity Report: Rule 2202 Summary Status Report – Written Report
4. Intergovernmental Review of Environmental Documents and CEQA Lead Agency Projects – Written Report

ATTACHMENT 1

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
MOBILE SOURCE COMMITTEE MEETING
Attendance – June 20, 2025**

| | |
|--------------------------------------|---------------------------------------|
| Senator (Ret.) Vanessa Delgado | South Coast AQMD Board Member |
| Mayor Pro Tem Larry McCallon | South Coast AQMD Board Member |
| Mayor Pro Tem Carlos Rodriguez | South Coast AQMD Board Member |
| Chuck Hahn | Board Consultant (Nguyen) |
| Sandra Hernandez | Board Consultant (Delgado) |
| Guillermo Gonzalez | Board Consultant (Perez) |
| Jackson Guze | Board Consultant (Raman) |
| Loraine Lundquist | Board Consultant (Mitchell) |
| Debra Mendelsohn | Board Consultant (McCallon/Rodriguez) |
| Whitney Amaya | EYCEJ |
| Leah Bates | Public Member |
| Sarah Baumann | POLB |
| Tom Cappucci | UPRR |
| Chris Chavez | Coalition for Clean Air |
| Curtis Coleman | Southern CA Air Quality Alliance |
| Amber Coluso | POLA |
| Natalie Delgado-Carrillo | CCEJN |
| Kiera Dixon | Ramboll |
| Harvey Eder | Public Solar Power Coalition |
| Fernando Gaytan | Earthjustice |
| Jacob Goldberg | POLB |
| Adrian Granda | POLB |
| Michelle Grubbs | PMSA |
| Lori Huddleston | Metro |
| Thomas Jelenic | PMSA |
| Brian Johsz | City of Chino Hills |
| Yassi Kavezade | RMI |
| Bill LaMarr | CSBA |
| Artie Mandel | POLA |
| Fernando Marquez Duarte | PCEJ |
| Gracyna Mohabir | EnviroVoters |
| Michael Ohanlon | Public Member |
| Cristhian Tapia | Pacific Environment |
| Heather Tomley | POLB |
| Eleanor Torres | POLB |
| Nina Turner | POLB |
| Andrea Vidaurre | PCEJ |
| Peter Whittingham | WPAA |
| Debra Ashby | South Coast AQMD Staff |

Barbara Baird South Coast AQMD Staff
 Monica Fernandez-Neild South Coast AQMD Staff
 Bayron Gilchrist South Coast AQMD Staff
 De Groeneveld South Coast AQMD Staff
 Ilynn Guarin South Coast AQMD Staff
 Aaron Katzenstein South Coast AQMD Staff
 Brandee Keith South Coast AQMD Staff
 Angela Kim South Coast AQMD Staff
 Daniel Kim South Coast AQMD Staff
 Ricky Lai South Coast AQMD Staff
 Howard Lee South Coast AQMD Staff
 Paul Macias South Coast AQMD Staff
 Ian MacMillan South Coast AQMD Staff
 Terrence Mann South Coast AQMD Staff
 Ron Moskowitz South Coast AQMD Staff
 Ghislain Muberwa South Coast AQMD Staff
 Susan Nakamura South Coast AQMD Staff
 Wayne Nastri South Coast AQMD Staff
 Charlene Nguyen South Coast AQMD Staff
 Robert Paud South Coast AQMD Staff
 Marissa Poon South Coast AQMD Staff
 Sarah Rees South Coast AQMD Staff
 Melina Tisopulos South Coast AQMD Staff
 Brian Tomasovic South Coast AQMD Staff
 Carolina Vargas South Coast AQMD Staff
 Mei Wang South Coast AQMD Staff
 Jessica Wei South Coast AQMD Staff
 Vicki White South Coast AQMD Staff



South Coast
 Air Quality Management District
 21865 Copley Drive, Diamond Bar, CA 91765
 (909) 396-2000, www.aqmd.gov

Rule 2305 Implementation Status Report:
Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program

April 1, 2025 to May 31, 2025

1. Implementation and Outreach Activities:

| Activity | Since Last Report | Since Rule Adoption |
|--|-------------------|---------------------|
| Calls and Emails to WAIRE Program Hotline (909-396-3140) and Helpdesk (waire-program@aqmd.gov) | 849 | 17,259 |
| Views of Compliance Training Videos (outside of webinars) | 15,173 | 45,461 |
| Notices Sent to Email Subscribers with Information About WAIRE Program Resources | 0 | 108,449 |
| Visits to www.aqmd.gov/waire | 4,593 | 99,215 |
| Warehouse Locations Visited In-Person | 541 | 4,404 |
| Presentations to Stakeholders* | 2 | 151 |

*METTRANS International Urban Freight Conference and Advanced Clean Transportation Expo.

2. Highlights of Recent Implementation and Enforcement Activities

- A total of 1,712 Annual WAIRE Reports (AWRs) were submitted by warehouse operators for the first two compliance periods (2022 and 2023) as of May 31, 2025. To date, a total of about 622,809 WAIRE Points have been earned across all options in the two compliance periods, far exceeding the total WAIRE Points Compliance Obligation of about 170,249 Points reported by these entities. The excess points may be banked by the warehouse operators for future compliance.
- For the most recent 2024 compliance period, a total of 1,377 Annual WAIRE Reports (AWRs) were submitted by warehouse operators as of May 31, 2025. These warehouse operators earned a total of about 588,345 WAIRE Points across all WAIRE Menu options during this compliance period, which far exceeds the total reported WAIRE Points Compliance Obligation of 205,557 points.
- As of May 31, 2025, warehouse operators reported approximately \$55.6 million in mitigation fees (approximately 55,552 mitigation fee points earned). Mitigation fee points represent about 4.6% of all WAIRE points earned.
- Since December 2023, 702 Notice of Violations (NOVs) have been issued to warehouse operators for failure to submit required reports by the due date. Approximately 330 warehouses have contacted South Coast AQMD directly in response to the NOVs issued,

and staff are providing compliance assistance as needed. Approximately 315 facilities have subsequently filed the required reports.

3. Summary of Reporting Rates

The table below includes estimates of the reporting rates for the AWRs received by warehouse operators in the first three compliance years of rule implementation¹. This table shows “anticipated reports”, which is an estimate of AWRs based on warehouse operators identified through Rule 2305 reporting and CoStar data through August 2024². Based on reported information, we estimate about 81% of entities with at least 100,000 square feet of indoor floor space need to earn WAIRE Points and submit an AWR, with the remaining 19% only required to submit limited information in an Initial Site Information Report. As additional reports are received, this estimate is subject to change. The table shows the number of warehouse operators that are anticipated to earn points. Reporting rates will increase through time in response to ongoing staff outreach and enforcement efforts.

AWR Reporting Rate Summary*

| Compliance Year | 2022 | 2023 | | 2024 | | |
|-------------------------|----------------|----------------|----------------|----------------|----------------|----------------|
| Phase | Phase 1 | Phase 1 | Phase 2 | Phase 1 | Phase 2 | Phase 3 |
| AWRs Received | 660 | 646 | 406 | 624 | 415 | 338 |
| Anticipated AWRs | 1,408 | 1,408 | 1,287 | 1,408 | 1,287 | 1,661 |
| Reporting Rate | 47% | 46% | 32% | 44% | 32% | 20% |

* Reporting rates as of May 31, 2025. The reports received totals do not include the following: operators not subject to AWR reporting, voluntary AWRs submitted by warehouse facility owners, warehouse operators who submitted an early action AWR prior to their first AWR due date, and a small number of AWRs submitted in error.

¹ Subject to auditing by South Coast AQMD.

² These numbers exclude those operators that are not required to earn WAIRE Points.



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

Rule 2202 Summary Status Report Activity for January 1, 2025 – May 31, 2025

| Employee Commute Reduction Program (ECRP) | |
|---|-----|
| # of Submittals: | 107 |

| Emission Reduction Strategies (ERS) | |
|-------------------------------------|----|
| # of Submittals: | 21 |

| Air Quality Investment Program (AQIP) Exclusively | | |
|---|-----------------|-------------------|
| County | # of Facilities | \$ Amount |
| Los Angeles | 35 | \$ 122,152 |
| Orange | 3 | \$ 8,038 |
| Riverside | 0 | \$ 0 |
| San Bernardino | 4 | \$ 63,272 |
| TOTAL: | 42 | \$ 193,462 |

| ECRP w/AQIP Combination | | |
|-------------------------|-----------------|-------------|
| County | # of Facilities | \$ Amount |
| Los Angeles | 0 | \$ 0 |
| Orange | 0 | \$ 0 |
| Riverside | 0 | \$ 0 |
| San Bernardino | 0 | \$ 0 |
| TOTAL: | 0 | \$ 0 |

Total Active Sites as of May 31, 2025

| ECRP (AVR Surveys) | | | TOTAL Submittals w/Surveys | AQIP | ERS | TOTAL |
|--------------------|-------------------|------------------|----------------------------------|------|-------|-------------------|
| ECRP ¹ | AQIP ² | ERS ³ | | | | |
| 479 | 6 | 11 | 496 | 97 | 720 | 1,313 |
| 36.6% | 0.6% | 0.8% | 38.0% | 7.0% | 55.0% | 100% ⁴ |

Total Peak Window Employees as of May 31, 2025

| ECRP (AVR Surveys) | | | TOTAL Submittals w/Surveys | AQIP | ERS | TOTAL |
|--------------------|-------------------|------------------|----------------------------------|--------|---------|-------------------|
| ECRP ¹ | AQIP ² | ERS ³ | | | | |
| 386,657 | 1,600 | 1,774 | 390,031 | 14,245 | 286,063 | 690,339 |
| 56.0% | 0.2% | 0.3% | 56.5% | 2.0% | 41.5% | 100% ⁴ |

- Notes:**
1. ECRP Compliance Option.
 2. ECRP Offset (combines ECRP w/AQIP). AQIP funds are used to supplement the ECRP AVR survey shortfall.
 3. ERS with Employee Survey to get Trip Reduction credits. Emission/Trip Reduction Strategies are used to supplement the ECRP AVR survey shortfall.
 4. Totals may vary slightly due to rounding.

BOARD MEETING DATE: August 1, 2025

AGENDA NO.

REPORT: Intergovernmental Review of Environmental Documents and CEQA Lead Agency Projects

SYNOPSIS: This report provides a listing of environmental documents prepared by other public agencies seeking review by South Coast AQMD between May 1, 2025 and May 31, 2025, and proposed projects for which South Coast AQMD is acting as lead agency pursuant to CEQA.

COMMITTEE: Mobile Source, June 20, 2025, Reviewed

RECOMMENDED ACTION:
Receive and file.

Wayne Natri
Executive Officer

SR:MK:BR:SW:ET:DC

Background

The California Environmental Quality Act (CEQA) Statute and Guidelines require public agencies, when acting in their lead agency role, to provide an opportunity for other public agencies and members of the public to review and comment on the analysis in environmental documents prepared for proposed projects. A lead agency is when a public agency has the greatest responsibility for supervising or approving a proposed project and is responsible for the preparation of the appropriate CEQA document.

Each month, South Coast AQMD receives environmental documents, which include CEQA documents, for proposed projects that could adversely affect air quality. South Coast AQMD fulfills its intergovernmental review responsibilities, in a manner that is consistent with the Board's 1997 Environmental Justice Guiding Principles and Environmental Justice Initiative #4, by reviewing and commenting on the adequacy of the air quality analysis in the environmental documents prepared by other lead agencies.

The status of these intergovernmental review activities is provided in this report in two sections: 1) Attachment A lists all of the environmental documents prepared by other public agencies seeking review by South Coast AQMD that were received during the reporting period; and 2) Attachment B lists the active projects for which South Coast AQMD has reviewed or is continuing to conduct a review of the environmental documents prepared by other public agencies. Further, as required by the Board's October 2002 Environmental Justice Program Enhancements for fiscal year (FY) 2002-03, each attachment includes notes for proposed projects which indicate when South Coast AQMD has been contacted regarding potential air quality-related environmental justice concerns. The attachments also identify for each proposed project, as applicable: 1) the dates of the public comment period and the public hearing date; 2) whether staff provided written comments to a lead agency and the location where the comment letter may be accessed on South Coast AQMD's website; and 3) whether staff testified at a hearing.

In addition, the South Coast AQMD will act as lead agency for a proposed project and prepare a CEQA document when: 1) air permits are needed; 2) potentially significant adverse impacts have been identified; and 3) the South Coast AQMD has primary discretionary authority over the approvals. Attachment C lists the proposed air permit projects for which South Coast AQMD is lead agency under CEQA.

Attachment A – Log of Environmental Documents Prepared by Other Public Agencies and Status of Review, and Attachment B – Log of Active Projects with Continued Review of Environmental Documents Prepared by Other Public Agencies

Attachment A contains a list of all environmental documents prepared by other public agencies seeking review by South Coast AQMD that were received pursuant to CEQA or other regulatory requirements. Attachment B provides a list of active projects, which were identified in previous months' reports, and which South Coast AQMD staff is continuing to evaluate or prepare comments relative to the environmental documents prepared by other public agencies. The following table provides statistics on the status of review¹ of environmental documents for the current reporting period for Attachments A and B combined²:

¹ The status of review reflects the date when this Board Letter was prepared. Therefore, Attachments A and B may not reflect the most recent updates.

² Copies of all comment letters sent to the lead agencies are available on South Coast AQMD's website at: <http://www.aqmd.gov/home/regulations/ceqa/commenting-agency>.

| Statistics for Reporting Period from May 1, 2025 to May 31, 2025 | |
|---|-----------|
| Attachment A: Environmental Documents Prepared by Other Public Agencies and Status of Review | 83 |
| Attachment B: Active Projects with Continued Review of Environmental Documents Prepared by Other Public Agencies (which were previously identified in the April 2025 report) | 6 |
| Total Environmental Documents Listed in Attachments A & B | 89 |
| <i>Comment letters sent</i> | 8 |
| <i>Environmental documents reviewed, but no comments were made</i> | 67 |
| <i>Environmental documents currently undergoing review</i> | 14 |

Staff focuses on reviewing and preparing comments on environmental documents prepared by other public agencies for proposed projects: 1) where South Coast AQMD is a responsible agency under CEQA (e.g., when air permits are required but another public agency is lead agency); 2) that may have significant adverse regional air quality impacts (e.g., special event centers, landfills, goods movement); 3) that may have localized or toxic air quality impacts (e.g., warehouse and distribution centers); 4) where environmental justice concerns have been raised; and 5) which a lead or responsible agency has specifically requested South Coast AQMD review.

If staff provided written comments to a lead agency, then a hyperlink to the “South Coast AQMD Letter” is included in the “Project Description” column which corresponds to a notation in the “Comment Status” column. In addition, if staff testified at a hearing for a proposed project, then a notation is included in the “Comment Status” column. Copies of all comment letters sent to lead agencies are available on South Coast AQMD’s website at: <http://www.aqmd.gov/home/regulations/ceqa/commenting-agency>. Interested parties seeking information regarding the comment periods and scheduled public hearings for projects listed in Attachments A and B should contact the lead agencies for further details as these dates are occasionally modified.

In January 2006, the Board approved the Clean Port Initiative Workplan (Workplan). One action item of the Workplan was to prepare a monthly report describing CEQA documents for projects related to goods movement and to make full use of the process to ensure the air quality impacts of such projects are thoroughly mitigated. In accordance with this action item, Attachments A and B organize the environmental documents received according to the following categories: 1) goods movement projects; 2) schools; 3) landfills and wastewater projects; 4) airports; and 5) general land use projects. In response to the action item relative to mitigation, staff maintains a compilation of mitigation measures presented as a series of tables relative to off-road engines; on-road engines; harbor craft; ocean-going vessels; locomotives; fugitive dust; and greenhouse gases which are available on South Coast AQMD’s website at:

<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>. Staff will continue compiling tables of mitigation measures for other emission sources such as ground support equipment.

Attachment C – Proposed Air Permit Projects for Which South Coast AQMD is CEQA Lead Agency

The CEQA lead agency is responsible for determining the type of environmental document to be prepared if a proposal requiring discretionary action is considered to be a “project” as defined by CEQA. South Coast AQMD periodically acts as lead agency for its air permit projects and the type of environmental document prepared may vary depending on the potential impacts. For example, an Environmental Impact Report (EIR) is prepared when there is substantial evidence that the project may have significant adverse effects on the environment. Similarly, a Negative Declaration (ND) or Mitigated Negative Declaration (MND) may be prepared if a proposed project will not generate significant adverse environmental impacts, or the impacts can be mitigated to less than significance. The ND and MND are types of CEQA documents which analyze the potential environmental impacts and describe the reasons why a significant adverse effect on the environment will not occur such that the preparation of an EIR is not required.

Attachment C of this report summarizes the proposed air permit projects for which South Coast AQMD is lead agency and is currently preparing or has prepared environmental documentation pursuant to CEQA. As noted in Attachment C, South Coast AQMD is lead agency for four air permit projects during May 2025.

Attachments

- A. Environmental Documents Prepared by Other Public Agencies and Status of Review
- B. Active Projects with Continued Review of Environmental Documents Prepared by Other Public Agencies
- C. Proposed Air Permit Projects for Which South Coast AQMD is CEQA Lead Agency

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to May 31, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|---|--|--------------------|---------------------|---|
| Warehouse & Distribution Centers ORC250506-07 DJT4 Parcel Delivery Facility Project (Amazon Parcel Delivery Facility Project) | The project consists of demolishing an existing 637,503 square foot office building, surface parking, and associated landscape areas and constructing a new industrial warehouse consisting of 181,500 square foot parcel delivery facility building. The 31.6-acre site is located at 275 Valencia Avenue in Brea. Staff previously provided comments on the Notice of Availability of a Draft Environmental Impact Report, which can be accessed at: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2024/december-2024/orc241106-09-deir-djt4-parcel-delivery-facility-project.pdf . References: ORC241106-09 and ORC230719-13 Comment Period: N/A Public Hearing: 5/13/2025 | Other | City of Brea | Document reviewed - No comments sent |
| Warehouse & Distribution Centers RVC250501-05 PP2024-0052 | The project consists of amending Plot Plan No. 04-PP-18 to add a 457,444 square foot single-story warehouse building and associated improvements within the Rolling Hills Ranch Industrial Park Specific Plan (Crossroads Logistics Center). No variances or amendments to the approved specific Plan or Plot Plan conditions of approval are requested. The project is located at 1022 Prosperity Way in Beaumont. Comment Period: N/A Public Hearing: N/A | Other | City of Beaumont | Document reviewed - No comments sent |

Key:

= Project has potential environmental justice concerns due to the nature and/or location of the project.

LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP =

Project located outside of South Coast AQMD jurisdiction

Project Notes:

1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to May 31, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|---|---|---|------------------------------------|--|
| Warehouse & Distribution Centers RVC250527-04 Newcastle Arrow Route Project | The project consists of demolishing two non-operational and unoccupied industrial buildings that are approximately 157,221 square feet and 20,000 square feet, respectively, and a 100-space surface parking lot and constructing, operating, and maintaining one concrete tilt-up industrial warehouse building with approximately 334,776 gross square feet of floor area on 14.8 acres. The project is located at 12459 Arrow Route in Rancho Cucamonga. Comment Period: 5/22/2025 - 7/8/2025 Public Hearing: N/A | Draft Environmental Impact Report | City of Rancho Cucam onga | Under review, may submit comments |
| Warehouse & Distribution Centers RVC250528-02 First Industrial Logistics at Harley Knox Indian Project | The project consists of merging seven parcels and constructing a 549,786 square foot warehouse on 25 acres with high-cube warehouse distribution uses, solar-ready rooftop panels, 10,000 square feet of office and mezzanine uses, and 94 dock doors on the north side of the building. The project also includes infrastructure, appurtenances, associated parking areas, and associated 1.1-acre off-site improvements. The project is located at the northwest corner of Harley Knox Boulevard and Indian Avenue in Perris. Comment Period: 5/30/2025 - 6/30/2025 Public Hearing: N/A | Notice of Preparation | City of Perris | Under review, may submit comments |
| Warehouse & Distribution Centers SBC250521-07 Sierra Distribution Facility Project | The project consists of constructing a 398,514 square foot warehouse on 18.3 acres. The project would provide 125 parking stalls, 71 trailer stalls, 10 trailer tandem stalls, and 37 tractor trailer stalls. The project is located on the northeast corner of the intersection of Sierra Avenue and Clubhouse Drive and is bounded to the north and south by existing warehouse industrial buildings, to the east by Mango Avenue and a landfill, and to the west by Sierra Avenue and residential development, in Fontana. Staff previously provided comments on the Notice of Preparation for the project, which can be accessed at: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/may-2023/SBC230405-03.pdf . Reference SBC230405-03 Comment Period: N/A Public Hearing: N/A | Final Environmental Impact Report | City of Fontana | Under review, may submit comments |

Key:
= Project has potential environmental justice concerns due to the nature and/or location of the project.
LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP = Project located outside of South Coast AQMD jurisdiction
Project Notes:
1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to May 31, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|---|--|---|--------------------------|-----------------------------------|
| Industrial and Commercial RVC250527-02 The Barker Business Park | The project consists of constructing a 25,750-square foot building on five acres and a 14,139-square foot building on 10 acres, and designating 9.6 acres for the sale and rental of commercial trailers – all on a site totaling 25.6 gross acres which is comprised of two vacant parcels bisected by East Frontage Road. The project is located northeast of Interstate 215 and Placentia Avenue interchange, between Walnut Avenue to the north and Placentia Avenue to the south in Perris. Staff previously provided comments on the Mitigated Negative Declaration, which can be accessed at: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2025/april-2025/rvc250319-01.pdf . References: RVC250319-01; RVC200825-01; RVC200611-28 and RVC190924-01 Comment Period: N/A Public Hearing: 6/4/2025 | Other | City of Perris | Under review, may submit comments |
| Industrial and Commercial SBC250502-10 El Camino Project | The project consists of expanding a beverage distribution facility on a three-acre site by: 1) constructing up to 1,054,541 square feet of new manufacturing, light industrial, office uses, a four-story parking structure, a solar energy and battery storage system, and a cogeneration system during two phases of construction on the northern and southern portions of the site; and 2) demolishing a 62,210 square foot warehouse on the northern portion. The project is comprised of eight contiguous assessor parcels and bounded by 7th Street to the north, Utica Avenue to the east, 6th Street to the south, and Haven Avenue to the west. The project is located in the southern area of Rancho Cucamonga. Staff previously provided comments on the Draft Environmental Impact Report, which can be viewed at: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/october-2023/SBC230920-09.pdf . References: SBC230823-10 and SBC230920-09 Comment Period: 4/29/2025 - 6/13/2025 Public Hearing: N/A | Notice of Availability of a Draft Environmental Impact Report | City of Rancho Cucamonga | Under review, may submit comments |

Key:

= Project has potential environmental justice concerns due to the nature and/or location of the project.

LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP =

Project located outside of South Coast AQMD jurisdiction

Project Notes:

1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to May 31, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|---|--|------------------------------|--|--------------------------------------|
| <i>Waste and Water-related</i> LAC250501-03 Pure Water Southern California# | The project consists of a constructing a regional water recycling facility that would produce high quality water to refill underground reservoirs for use in the event of an earthquake or other emergency that disrupts imported water supplies. The project is located at 24501 South Figueroa Street on the northwest corner of South Figueroa Street and West Lomita Boulevard in Carson and encompasses unincorporated areas of Los Angeles, Orange, and San Bernardino counties in the designated AB 617 Wilmington, Carson, West Long Beach community. Staff previously provided comments for the Draft Environmental Impact Report which can be viewed at: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2022/november/LAC221004-04.pdf . Reference: LAC221004-04 Comment Period: 5/14/2025 - 7/14/2025 Public Hearing: N/A | Initial Project Consultation | Metropolitan Water District of Southern California | Document reviewed - No comments sent |
| <i>Waste and Water-related</i> LAC250502-01 Community Survey: General Electric Property# | The project consists of a cleaning up polychlorinated biphenyls and volatile organic compound at the 2.5-acre industrial area site. The project is located at 6900 Stanford Avenue in Los Angeles and within the designated AB617 South Los Angeles and Southeast Los Angeles community. Comment Period: 4/30/2025 - 5/1/2025 Public Hearing: N/A | Other | Department of Toxic Substances Control (DTSC) | Document reviewed - No comments sent |

Key:

= Project has potential environmental justice concerns due to the nature and/or location of the project.

LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP =

Project located outside of South Coast AQMD jurisdiction

Project Notes:

1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to May 31, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|---|--|--|---|--|
| <i>Waste and Water-related</i> LAC250506-03 Heraeus Precious Metals - Hazardous Waste Facility Permit Modification | The project consists of replacing two 750-gallon reactors (K-3 and K-24) due to worn out liners. The project is located at 15524 Carmenita Road, in Santa Fe Springs. Reference: LAC230322-04 Comment Period: N/A Public Hearing: N/A | Other | Department of Toxic Substances Control (DTSC) | Document reviewed - No comments sent |
| <i>Waste and Water-related</i> LAC250512-01 Sand Canyon Sewer Relocation Project | The project consists of constructing a 0.7-mile sewer line that would begin on an overbank adjacent to the north line of the Santa Clara River and south of State Route 14 and includes: 1) making additional minor modifications and adjustments to the access road; 2) aligning the multipurpose trail; 3) modifications to the soil cement bank protection to include rock slope protection in three locations; 4) removing the exposed portions of nine manholes from within the Santa Clara River channel; and 5) installing new access banks from the Santa Clara River to the manhole locations. The majority of the project is located in an undeveloped area to the north of Santa Clara River and along the northern bank of the Santa Clara River. A portion of the project is located along Sand Canyon Road and terminates near existing commercial uses east of the right-of-way. The project encompasses 2.5 acres located in the eastern portion of Santa Clarita. References: LAC240417-06; LAC240328-02; LAC240306-01; LAC230308-0; LAC140221-01 and LAC161201-01 Comment Period: 5/9/2025 - 6/9/2025 Public Hearing: N/A | Addendum to the Initial Study/Mitigated Negative Declaration | Santa Clarita Valley Water Agency | Document reviewed - No comments sent |
| <i>Waste and Water-related</i> LAC250513-01 Community Survey - Pontius | The project consists of cleaning up volatile organic compounds including tetrachloroethene and trichloroethene. A Removal Action Plan will be prepared and implemented to address these issues. The project site is located at 2330 Pontius Avenue in Los Angeles. Comment Period: 5/12/2025 - 6/2/2025 Public Hearing: N/A | Community Survey | Department of Toxic Substances Control (DTSC) | Document reviewed - No comments sent |

Key:

= Project has potential environmental justice concerns due to the nature and/or location of the project.

LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP =

Project located outside of South Coast AQMD jurisdiction

Project Notes:

1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to May 31, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|--|--|--|--|--------------------------------------|
| <i>Waste and Water-related</i> LAC250513-02 Class 1 Permit Notification Pacific Resource Recovery Services# | The project consists of a request for a Class 1 Permit Modification to: 1) provide notification of the intended replacement of two existing tanks (T-59, T-61) with new tanks built to the same design standards; 2) install a mixer on one of its tanks; 3) update a list of equipment subject to air emissions standards in the facilities permit application; 4) request removal of a permit condition that is no longer need because its terms have been satisfied; and 5) correct typographical and administrative errors . The project is located at 3150 East Pico Boulevard in Los Angeles and within the designated AB 617 East Los Angeles, Boyle Heights, and West Commerce community. Reference: LAC241002-08 Comment Period: N/A Public Hearing: N/A | Other | Department of Toxic Substances Control (DTSC) | Document reviewed - No comments sent |
| <i>Waste and Water-related</i> LAC250514-02 Arroyo Seco Water Reuse Project | The project consists of developing two regional stormwater capture and treatment facilities in the Lower Arroyo Seco Channel adjacent to the Arroyo Seco Channel (the Channel) at: 1) the northern, San Rafael Site which is situated in southwest of the San Rafael Avenue overpass of the Channel; and 2) the southern, San Pascual Site which is situated southeast of the San Pascual Avenue overpass of the Channel and on the east side of the Channel. The project is located in Pasadena and South Pasadena. Reference: LAC231201-12 Comment Period: 5/15/2025 - 6/13/2025 Public Hearing: N/A | Notice of Preparation of a Draft Environmental Impact Report | City of Pasadena | Under review, may submit comments |
| <i>Waste and Water-related</i> LAC250515-01 Pure Water Southern California Program# | The project consists of a constructing regional water recycling facility that would be capable of producing high quality water to refill underground reservoirs for use in the event of an earthquake or other emergency that disrupts imported water supplies. The project is located at 24501 South Figueroa Street on the northwest corner of South Figueroa Street and West Lomita Boulevard in Carson and encompasses unincorporated areas of Los Angeles, Orange, and San Bernardino counties in the designated AB 617 Wilmington, Carson, West Long Beach community. Staff previously provided comments for the Draft Environmental Impact Report, which can be viewed at: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2022/november/LAC221004-04.pdf Reference: LAC250501-03 and LAC221004-04 Comment Period: 5/14/2025 - 7/14/2025 Public Hearing: N/A | Draft Environmental Impact Report | The Metropolitan Water District of Southern California | Under review, may submit comments |

Key:

= Project has potential environmental justice concerns due to the nature and/or location of the project.

LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP =

Project located outside of South Coast AQMD jurisdiction

Project Notes:

1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to May 31, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|--|---|---|---|--|
| <i>Waste and Water-related</i> ORC250502-06 Carbon Canyon Dam Safety Modification Study | The project consists of investigating dam safety improvements to reduce dam safety risk and providing a basis from which to recommend a plan for implementation. The project is located in Carbon Canyon. References: ORC100831-07 and ORC100105-03 Comment Period: N/A Public Hearing: N/A | Initial Project Consultation | U.S. Army Corps of Engineers | Document reviewed - No comments sent |
| <i>Waste and Water-related</i> ORC250506-06 S & S Polishing and Plating | The project consists of cleaning up metals and volatile organic compounds from the S & S Polishing and Plating facility located at 1503 North Miller Street in Anaheim. Reference: ORC250312-07 Comment Period: 5/8/2025 - 6/6/2025 Public Hearing: N/A | Other | Department of Toxic Substances Control (DTSC) | Document reviewed - No comments sent |
| <i>Waste and Water-related</i> ORC250514-03 Coyote Canyon Landfill Gas to Energy Plant Project | The project consists of demolishing existing gas-to-energy facility structures and constructing a wireless telecommunication facility on 4.14 acres. The project is located at 20662 Newport Coast Drive near the northeast corner of San Joaquin Hills Road and Newport Coast Drive in Newport Beach. References: ORC180403-15; ORC160928-01 and ORC160804-05 Comment Period: N/A Public Hearing: N/A | Response to Comments | City of Newport Beach | Under review, may submit comments |
| <i>Waste and Water-related</i> ORC250520-03 Aliso Creek Lift Station Improvement Projects | The project consists of: : 1) demolishing, abandoning, removing, relocating, reconfiguring, replacing, and converting various components of the existing lift station; 2) constructing a new wet well, new electrical building, two new emergency discharge manholes, a new force main connection and a new access driveway on Avenida Sevilla; and 3) removing 15 trees. The project is located on 0.16 acre at the existing Aliso Creek Lift Station, immediately north of Avenida Sevilla overcrossing of Aliso Creek in the Laguna Woods Village in Laguna Woods . Reference: ORC250304-05 Comment Period: N/A Public Hearing: N/A | Final Initial Study/Mitigated Negative Declaration | El Toro Water District | Document reviewed - No comments sent |

Key:
= Project has potential environmental justice concerns due to the nature and/or location of the project.
LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP =
Project located outside of South Coast AQMD jurisdiction
Project Notes:
1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to May 31, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|---|---|--|---|--------------------------------------|
| Waste and Water-related SBC250527-07 Kaiser Ventures, Inc. | The project consists of a permit renewal that requires the facility to monitor and maintain a hazardous waste landfill that was created to contain waste from the former steel mill. The Chemwest Upper Ponds/Consolidated Waste Cell, Aboveground Storage Tanks, Chrome Ponds and Adjacent Areas, cap area, covers an area of approximately 29 acres. The project is located at 13557 San Bernardino Avenue in Fontana. References: SBC240821-11; SBC190822-03 and SBC160719-04 Comment Period: 5/27/2025 - 6/18/2025 Public Hearing: N/A | Community Survey | Department of Toxic Substances Control (DTSC) | Document reviewed - No comments sent |
| Utilities ORC250506-08 Compass Energy Storage Project | The project consists of constructing a battery energy storage system that would be capable of storing up to 250 megawatts (MW) of electricity for up to 4 hours (up to 1,000 MW-hours) on 12.4 acres. The project is bounded by Saddleback Church Rancho Capistrano to the north, Interstate 5 to the east, Oso Creak to the east and south, and the city limits of San Juan Capistrano to the west in San Juan Capistrano. Reference: ORC240419-01 Comment Period: 5/3/2025 - 6/2/2025 Public Hearing: N/A | Notice of Preparation of a Draft Environmental Impact Report | California Energy Commission | Under review, may submit comments |
| Transportation ORC250502-07 LCP Amendment No. LCP -5 DPT-25- 0008-1 - Strand Transit System | The project consists of amending the language in the Implementation Plan and Land Use Plan of the certified Local Coastal Program. The terms “funicular” and “inclined elevator” will be replaced with Strand Transit System (STS). The project is located in Orange County. Comment Period: 4/30/2025 - 5/6/2025 Public Hearing: 5/7/2025 | Other | California Coastal Commission | Document reviewed - No comments sent |

Key:
= Project has potential environmental justice concerns due to the nature and/or location of the project.
LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP = Project located outside of South Coast AQMD jurisdiction
Project Notes:
1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to May 31, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC | LEAD AGENCY | COMMENT STATUS |
|--|---|-------------------|---------------------|--------------------------------------|
| Retail LAC250515-02 Pacific Place Project# | The project consists of constructing a 206,756 square foot self-storage building with 551 rentable recreational vehicle (RV) parking stalls and 41 automobile parking stalls on 14.20 acres. The project is located at 3701 Pacific Place near the northwest corner of North Pacific Place and Ambeco Road in Long Beach within the designated AB 617 Wilmington, Carson, West Long Beach community. Staff previously provided comments on the Notice of Availability of a Draft Environmental Impact Report, which can be accessed at: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2024/september-2024/lac240801-15-draft-eir-pacific-place-project.pdf . References: LAC240801-15; LAC230607-01 and LAC201016-01 Comment Period: 5/14/2025 - 6/5/2025 Public Hearing: 6/5/2025 | Other | City of Long Beach | Document reviewed - No comments sent |
| Retail LAC250521-01 JEDI Zone Facade Improvement Program | The project consists of providing businesses forgivable loans/grants for the rehabilitation of deteriorated structures in a designated commercial area known as a Job and Economic Development Initiative (JEDI) Zone, to revitalize targeted underserved neighborhoods and create and/or preserve jobs. The project is located along the Reseda Boulevard Corridor between Van Owen St. (to the south) and Gault St. (to the north) in Council District 4 in the Reseda neighborhood of Los Angeles. Comment Period: 5/21/2025 - 5/28/2025 Public Hearing: N/A | Other | City of Los Angeles | Document reviewed - No comments sent |
| Retail RVC250513-07 PA25-0049 | The project consists of constructing a Panera Bread restaurant with a drive-thru totaling approximately 3,145 square feet. The project is generally located at the northwest corner of Temecula Parkway and Bedford Court intersection, in Temecula. Comment Period: N/A Public Hearing: N/A | Site Plan | City of Temecula | Document reviewed - No comments sent |

Key:

= Project has potential environmental justice concerns due to the nature and/or location of the project.

LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP =

Project located outside of South Coast AQMD jurisdiction

Project Notes:

1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to May 31, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC | LEAD AGENCY | COMMENT STATUS |
|--|---|---|--------------------------|--------------------------------------|
| Retail RVC250520-06 Riverside Alive Project | The project consists of constructing 168 residential units, a hotel with 376 rooms, a parking facility with five levels, 220,000 square feet for office uses, 12,875 square feet for restaurant uses, 20,690 square feet for grocery store uses, and 28,416 for fitness center uses on 10 acres. The project is located on the southwest corner of Orange Street and 3 rd Street in Riverside. Reference: RVC241010-08 Comment Period: 5/23/2025 - 7/7/2025 Public Hearing: N/A | Notice of Availability of a Draft Environmental Impact Report | City of Riverside | Document reviewed - No comments sent |
| Retail RVC250527-03 PLN25-0077 and PLN25-0078 (PR24-0236) Dutch Bros. Coffee and Mixed- Use Building | The project consists of constructing two mixed-use developments: 1) a 1,025 square foot building; and 2) an 8,200 square foot building on 8.63 acres. The project also includes parking spaces, drive-thru lanes, a bypass exit lane, two trash enclosures, and a customer walk-up window on the north side of the building. The project is located south of Newport Road, east of Bradley and west of Evans Road in Menifee. Comment Period: 5/27/2025 - 6/12/2025 Public Hearing: N/A | Site Plan | City of Menifee | Document reviewed - No comments sent |
| Retail SBC250527-06 PROJ-2025-00058/PROJ-2025-00056 | The project consists of constructing two restaurants and landscaping, which includes: 1) a 3,655 square foot McDonald's Restaurant and a drive-thru on a 0.89-acre parcel; 2) a 1,266 square foot Starbucks Coffee Shop with a drive-through on a 0.63-acre parcel; and 3) a five-foot reduction to the 15-foot required setback along Cedar Avenue. The project is located on Cedar Avenue in San Bernardino County. Comment Period: N/A Public Hearing: 6/5/2025 | Other | County of San Bernardino | Document reviewed - No comments sent |

Key:
= Project has potential environmental justice concerns due to the nature and/or location of the project.
LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP = Project located outside of South Coast AQMD jurisdiction
Project Notes:
1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to May 31, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|--|---|----------------------------------|-----------------------|--------------------------------------|
| General Land Use (residential, etc.) LAC250501-02 The Grace Villas Housing Project | The project consists of a constructing a seven-story building tohouse Transition Age Youth. The project is located in the Lincoln Heights area of East Los Angeles, at 216-224 South Avenue 24 in Los Angeles. Comment Period: 4/28/2025 - 5/13/2025 Public Hearing: N/A | Finding of No Significant Impact | City of Los Angeles | Document reviewed - No comments sent |
| General Land Use (residential, etc.) LAC250502-03 1216-1224 Menlo Avenue | The project consists of: 1) demolishing a two-story building and an existing three-story historic Craftsman Home due to fire damage; 2) constructing a new one-story home within the same footprint; 3)constructing a six-story building with 127 restricted units with 31 permanent supported housing, 95 units for low-income households, and one 1-bedroom unit to be designated as a manager’s unrestricted unit. The project is located at 1226–1224 Menlo Avenue in Los Angeles. Comment Period: 5/1/2025 - 5/16/2025 Public Hearing: N/A | Finding of No Significant Impact | City of Los Angeles | Document reviewed - No comments sent |
| General Land Use (residential, etc.) LAC250506-01 Tentative Tract Map 84680 | The project consists of constructing a new mixed-use building with 369 residential units and a 20,740 square foot commercial area. The project is located at 740-780 Garvey Avenue and 220 S Atlantic Boulevard in Monterey Park. Comment Period: 5/2/2025 - 5/19/2025 Public Hearing: N/A | Site Plan | City of Monterey Park | Document reviewed - No comments sent |

Key:
= Project has potential environmental justice concerns due to the nature and/or location of the project.
LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP = Project located outside of South Coast AQMD jurisdiction
Project Notes:
1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to May 31, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|--|---|---|-----------------------------|--------------------------------------|
| General Land Use (residential, etc.) LAC250506-04 Newhall Avenue Mixed Use Project | The project consists of subdividing a 9.7-acre property into three lots for future construction of 106 residential units, 70 apartments, 26 townhomes, and 4,000 square feet of commercial uses. The project is located at 23755 Newhall Avenue in Santa Clarita. Comment Period: 4/29/2025 - 5/20/2025 Public Hearing: 5/20/2025 | Notice of Intent to Adopt a Mitigated Negative Declaration | City of Santa Clarita | Document reviewed - No comments sent |
| General Land Use (residential, etc.) LAC250513-03 Tentative Tract Map 84666 | The project consists of constructing and subdividing three single-family condominiums and converting one lot into four lots. The project is located at 1585 Sombrero Drive in Monterey Park. Comment Period: 5/14/2025 - 5/29/2025 Public Hearing: N/A | Site Plan | City of Monterey Park | Document reviewed - No comments sent |
| Plans and Regulations ORC250502-04 El Camino Specific Plan Amendment | The project consists of expanding a mixed-use community and performing arts center by constructing: 1) The Forster & El Camino Mixed Use Project on a 3.17-acre vacant site; and 2) a Performing Arts Center on a 1.88-acre site. The project is located at 31878 Camino Capistrano in San Juan Capistrano. Staff previously provided comments on the Draft Environmental Impact Report, which can be viewed at: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/november-2023/ORC231011-09.pdf . References: ORC231011-09 and ORC210824-02 Comment Period: 4/24/2025 - 6/9/2025 Public Hearing: N/A | Notice of Availability of a Draft Environmental Impact Report | City of San Juan Capistrano | Document reviewed - No comments sent |

Key:

= Project has potential environmental justice concerns due to the nature and/or location of the project.

LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP =

Project located outside of South Coast AQMD jurisdiction

Project Notes:

1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to May 31, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC. | LEAD AGENCY | COMMENT STATUS |
|---|---|---|-----------------------|--------------------------------------|
| General Land Use (residential, etc.) SBC250513-09 Eden Mixed-Use Development Project | The project consists of : 1) constructing a self-storage facility along Euclid Avenue frontage; 2) constructing a mixed-use development consisting of 20,800 square feet of commercial retail, a 132,438 square foot self-storage facility, and a 265-unit residential rental community consisting of a three- to four-story apartment building at a density of 26.9 dwelling units per acre; 3) subdividing an approximately 9.82-acre site into five lots ranging from approximately 28,000 square feet to 218,000 square feet; and 4) requesting to allow two fast food drive-thru restaurant along the Schaefer Avenue Project frontage. The project is located on the north side of Schaefer Avenue between Euclid Avenue and Fern Avenue in Chino. Reference: SBC230214-11 Comment Period: 5/14/2025 - 5/21/2025 Public Hearing: 5/21/2025 | Other | City of Chino | Document reviewed - No comments sent |
| Plans and Regulations SBC250519-02 Walker Ranch Specific Plan (File Nos. PSP-24-0001 & PMTT24-0004) | The project consists of a residential development within 7.6 net acres of the 79.2 gross-acre site with: 1) a maximum buildout of 1,557 units and a potential target buildout of 940 units within the specified Planning Areas; 2) an Implementing Project consisting of 920 units on 67.2 net acres of the site; 3) a Tentative Tract Map (TTM No. 20670) which subdivides the 38-net acre portion of the site north of Southern California Edison on into 86 numbered lots (Lot 1- 86); 4) 21 lettered lots (Lot A-X), and three street/alley lots; and 5) additional improvements which include roadways, bicycle and pedestrian facilities, parking, landscaping parks, recreation facilities and utility infrastructure. The project is located at the northwest corner of the intersection of Edison Avenue to the south, Walker Avenue to the East and agricultural land to the west; and is bounded by Schaefer Avenue to the North in Ontario. Comment Period: 5/20/2025 - 6/19/2025 Public Hearing: N/A | Draft Environmental Impact Report | City of Ontario | Document reviewed - No comments sent |
| Plans and Regulations LAC250502-02 Tentative Tract Map 084721 | The project consists of subdividing a property for air rights, developing a nine -unit condominium complex, and . consolidating two lots into one lot. The project is located at 338-346 Sefton Avenue in Monterey Park. Comment Period: 4/30/2025 - 5/13/2025 Public Hearing: N/A | Site Plan | City of Monterey Park | Document reviewed - No comments sent |

Key:
= Project has potential environmental justice concerns due to the nature and/or location of the project.
LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP = Project located outside of South Coast AQMD jurisdiction
Project Notes:
1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

ATTACHMENT A
ENVIRONMENTAL DOCUMENTS PREPARED BY OTHER PUBLIC AGENCIES AND STATUS OF REVIEW
May 1, 2025 to May 31, 2025

| SOUTH COAST AQMD LOG-IN NUMBER PROJECT TITLE | PROJECT DESCRIPTION | TYPE OF DOC | LEAD AGENCY | COMMENT STATUS |
|--|--|-------------------|----------------|--------------------------------------|
| <i>Plans and Regulations</i> SBC250520-07 Villa Serena Specific Plan | The project consists of: 1) developing 65 single family residences, private community facilities and ancillary features on a 9.16-acre portion of the 15th Street flood control basin; 2) modifying 6.85-acres on the 15th Street flood control basin east of the proposed features to retain the basin's stormwater and flood control capacity/improvements; 3) extending 15th Street from the southwest corner of the site to Campus Avenue; and 4) developing a 0.15-acre public pocket park on 15th Street near the north end of Fernando Avenue, as specified in the Villa Serena Specific Plan. The project is located on the 20.3-acre 15th Street flood control basin south of Upland Hills Country Club in the central-eastern portion of Upland. References: SBC250408-06 and SBC241105-06 Comment Period: N/A | Other | City of Upland | Document reviewed - No comments sent |
| | Public Hearing: 6/9/2025 | | | |

Key:

= Project has potential environmental justice concerns due to the nature and/or location of the project.

LAC = Los Angeles County, ORC = Orange County, RVC = Riverside County, SBC = San Bernardino County, ALL = All counties within the South Coast AQMD jurisdiction, and ODP =

Project located outside of South Coast AQMD jurisdiction

Project Notes:

1. Disposition may change prior to Governing Board Meeting
2. Documents received by the CEQA Intergovernmental Review program but not requiring review are not included in this report.

DRAFT VERSION

**ATTACHMENT C PROPOSED AIR PERMIT PROJECTS FOR
WHICH SOUTH COAST AQMD IS CEQA LEAD AGENCY
THROUGH MAY 31, 2025**

| PROJECT DESCRIPTION | PROPONENT | TYPE OF DOCUMENT | STATUS | CONSULTANT |
|---|---------------------------------|--|--|--|
| <p>Quemetco is proposing to modify its existing South Coast AQMD permits to allow the facility to recycle more batteries and to eliminate the existing daily idle time of the furnaces. The proposed project will increase the rotary feed drying furnace feed rate limit from 600 to 750 tons per day and increase the amount of total coke material allowed to be processed. In addition, the project will allow the use of petroleum coke in lieu of or in addition to calcined coke and remove one existing emergency diesel-fueled internal combustion engine (ICE) and install two new emergency natural gas-fueled ICEs.</p> | <p>Quemetco</p> | <p>Environmental Impact Report (EIR)</p> | <p>The Draft EIR was released for a 124-day public review and comment period from October 14, 2021 to February 15, 2022 and approximately 200 comment letters were received.</p> <p>South Coast AQMD held two community meetings on November 10, 2021, and February 9, 2022, which presented an overview of the proposed project, the CEQA process, detailed analysis of the potentially significant environmental topic areas, and the existing regulatory safeguards. Response to written comments submitted relative to the Draft EIR and oral comments made at the community meetings are currently being prepared by the consultant.</p> <p>After the Draft EIR public comment and review period closed, Quemetco submitted additional applications for other permit modifications. South Coast AQMD staff is evaluating the effect of these new applications on the EIR process.</p> | <p>Trinity Consultants</p> |
| <p>Sunshine Canyon Landfill is proposing to modify its South Coast AQMD permits for its active landfill gas collection and control system to accommodate the increased collection of landfill gas. The proposed project will: 1) install two new low-emission flares with two additional 300-horsepower electric blowers; and 2) increase the landfill gas flow limit of the existing landfill gas collection system.</p> | <p>Sunshine Canyon Landfill</p> | <p>Subsequent Environmental Impact Report (SEIR)</p> | <p>The consultant has provided an updated Draft SEIR which is being concurrently reviewed by South Coast AQMD staff and the facility.</p> | <p>Castle Environmental Consulting</p> |

**ATTACHMENT C PROPOSED AIR PERMIT PROJECTS FOR
WHICH SOUTH COAST AQMD IS CEQA LEAD AGENCY
THROUGH MAY 31, 2025**

| PROJECT DESCRIPTION | PROPONENT | TYPE OF DOCUMENT | STATUS | CONSULTANT |
|--|--|--|--|----------------------------------|
| <p>SoCalGas is proposing to modify their Title V permit for the Honor Rancho Natural Gas Storage Field to: 1) replace five compressor engines with four new natural gas-fueled compressor engines (each rated at 5,000 horsepower (hp)), new selective catalytic reduction systems and a new aqueous urea storage tank; 2) install two new electric compressors (each rated at 5,500 hp) with associated ancillary equipment; 3) construct a new building to house the new compressors; 4) install an advanced renewable energy system, which will include hydrogen electrolyzers, hydrogen storage, and fuel blending equipment to mix hydrogen with natural gas which will fuel the compressor engines; 5) install a hydrogen vehicle fueling station; 6) install an electric microgrid with an energy storage system and a natural gas fuel cell system; and 7) install one new electricity transmission line which will connect to Southern California Edison.</p> | <p>Southern California Gas Company (SoCalGas)</p> | <p>Addendum to the Final Subsequent Environmental Assessment for Rule 1110.2 and Rule 1100, and the Final Program EIR for the 2016 Air Quality Management Plan</p> | <p>The consultant has prepared a revised preliminary draft Addendum which South Coast AQMD staff is reviewing.</p> | <p>Dudek</p> |
| <p>Tesoro is proposing modifications to its Carson Operations and Wilmington Operations at the Marathon Los Angeles Refinery in order to replace aging coke drums, produce asphalt binder, and make more high-octane, low vapor pressure clean-gasoline blendstock by modifying the fluid feed hydrodesulfurization unit, the fluidized catalytic cracking unit, and the alkylation units.</p> | <p>Tesoro Refining & Marketing Company, LLC (Tesoro)</p> | <p>Notice of Preparation of a Draft Environmental Impact Report and Initial Study (NOP/IS)</p> | <p>The consultant has prepared a preliminary draft NOP/IS which South Coast AQMD staff is reviewing.</p> | <p>Environmental Audit, Inc.</p> |

 [Back to Agenda](#)

BOARD MEETING DATE: August 1, 2025

AGENDA NO. 19

REPORT: Stationary Source Committee

SYNOPSIS: The Stationary Source Committee held a hybrid meeting on Friday, June 20, 2025. The following is a summary of the meeting.

RECOMMENDED ACTION:
Receive and file.

Larry McCallon,
Committee Chair
Stationary Source Committee

JW:reh

Call to Order

Committee Chair McCallon called the meeting to order at 10:31 a.m.

Roll Call

Committee Members

Present: Mayor Pro Tem Larry McCallon, Committee Chair
Chair Vanessa Delgado
Vice Chair Michael A. Cacciotti

Absent: Supervisor Holly J. Mitchell, Committee Vice Chair
Supervisor Curt Hagman
Board Member Veronica Padilla-Campos

For additional information of the Stationary Source Committee Meeting, please refer to the [Webcast](#).

ACTION ITEM:

1. Authorize Executive Officer to Negotiate and Execute MOU with County of Riverside Transportation Department for Assembly Bill 617 Eastern Coachella Valley Paving Projects and Reimburse County of Riverside Transportation Department for Administrative Costs

Walter Shen, Director of Community Engagement and Air Programs, presented a proposal to negotiate and execute a Memorandum of Understanding with the County of Riverside Transportation Department and reimburse Riverside County for administrative costs for the AB 617 Eastern Coachella Valley Paving Projects. For additional details, please refer to the [Webcast](#) starting at 00:04:00.

There were no comments received from Committee members or the public.

Moved by Cacciotti, seconded by Delgado, unanimously approved.

Ayes: Cacciotti, Delgado, McCallon.

Noes: None

Abstain: None

Absent: Hagman, Mitchell, Padilla-Campos

INFORMATIONAL ITEM:

2. Update on Proposed Amended Rules 223 (Requirements for Confined Animal Facilities), 445 (Wood Burning Devices), 1133 series (Composting, Chipping and Grinding, and Related Operations), and 1138 (Emissions from Restaurant Operations)

Dr. Sarah Rees, Deputy Executive Officer, Planning, Rule Development and Implementation, presented an overview of Proposed Amended Rules 223, 445, the 1133 series, and 1138. For additional details please refer to the [Webcast](#) beginning at 00:09:52.

Casey Corliss, Orange County Waste and Recycling, (PAR 1133 Series), commented that composting should be identified as an essential public service in rulemaking. Mr. Corliss noted compliance with California Senate Bill 1383 as the impetus to update composting permits and the high cost of required emission reduction credits (ERCs). Second, Mr. Corliss commented that PAR 1133 Series discourages the covered aerated static pile (CASP) composting method and requested more information on the basis for the baseline emission factors used in the PAR 1133 Series.

Kevin Abernathy, General Manager of the Milk Producers Council, (PAR 223) commented that amendments to Rule 223 are not needed, as the local dairy cow populations have declined by 80 percent compared to 1994 levels and dairy farms are already implementing mitigation measures. Mr. Abernathy also stated that Rule

223 mitigation measures are focused on VOC reductions and ammonia reduction estimates have not been peer reviewed and that permitting fees are very burdensome for small farms.

Harvey Eder, Public Solar Power Coalition, (PAR 445) commented that solar was not evaluated as an option for the proposed amendments to Rule 445.

Michael Krause, Assistant Deputy Executive Officer, Planning, Rule Development and Implementation, responded to Mr. Corliss' comments by explaining that designation of composting as an essential public service as it pertains to ERCs is outside of the scope of the PAR 1133 series but that it would be within the scope of Regulation XIII rulemaking. Regarding CASP, Mr. Krause noted that the PAR 1133 Series allows for the use of CASP for composting. Lastly, with respect to emission factors, Mr. Krause reiterated the pertinent parts of Dr. Rees's presentation; that the California Air Pollution Control Officers Association (CAPCOA) is currently reviewing composting emission factors and that it would be more appropriate to revisit baseline emission factors used in the PAR 1133 Series after CAPCOA's work is complete.

Dr. Rees responded to Mr. Abernathy's comments and clarified that Clean Air Act requirements to implement Most Stringent Measures do not have a de minimis off-ramp. South Coast AQMD staff discussed this with U.S. EPA staff who has reiterated the rule amendment is required under the Clean Air Act. For additional details please refer to the [Webcast](#) beginning at 00:29:54.

WRITTEN REPORTS:

3. Monthly Permitting Enhancement Program (PEP) Update

The report was acknowledged by the committee.

4. Monthly Update of Staff's Work with U.S. EPA and CARB on New Source Review Issues for the Transition of RECLAIM Facilities to a Command-and-Control Regulatory Program

The report was acknowledged by the committee.

5. Notice of Violation Penalty Summary

The report was acknowledged by the committee.

OTHER MATTERS:

6. Other Business

There was no other business to report.

7. Public Comment Period

Chris Chavez, Coalition for Clean Air, expressed gratitude to the five board members who supported Proposed Amended Rules 1111 and 1121, acknowledging the difficulty of opposing powerful entities like So Cal Gas. Mr. Chavez expressed disappointment that the Board is abandoning its commitments to air quality improvements and the public health implications. He urged the Board to quickly implement the GO ZERO Program. For additional details please refer to the [Webcast](#) beginning at 00:41:33.

Ayn Craciun, Climate Action Campaign, expressed gratitude to the committee for their recent vote supporting lifesaving rules and now calls for the urgent deployment of GO ZERO Program funds. For additional details please refer to the [Webcast](#) beginning at 00:44:03.

Mr. Eder emphasized the efficiency of heat pumps and the lack of studies on potential heat pump leaks and their environmental impact, particularly on the ozone layer. For additional details please refer to the [Webcast](#) beginning at 00:45:28.

Michael Rochmes, US Green Building Council, expressed disappointment that the Board did not adopt Proposed Amended Rules 1111 and 1121, despite collaborative efforts. He urged the committee not to abandon these rules but to develop a new, passable version. Mr. Rochmes also advocated for progressing with the large furnace rule and promptly launching the overdue GO ZERO Program for zero-emission appliances, emphasizing the need to increase its funding. For additional details please refer to the [Webcast](#) beginning at 00:47:25.

Committee Chair McCallon inquired about the GO ZERO Program's progress. Mr. Krause reported that three out of four contracts are already executed, with the final one expected within weeks. The program will feature an online portal for rebate applications on qualifying zero-emission units, with zip code-based eligibility for low-income or overburdened communities. Committee Chair McCallon raised concerns that the rebate model might exclude low-income individuals due to upfront cost and suggested that the program fund installers instead of homeowners. Mr. Krause added that the pilot program will run until funds are depleted. Executive Officer Nastri emphasized that GO ZERO is a pilot program and recommended that staff return to the Stationary Source Committee in six months to provide an update on implementation. Committee Chair McCallon concurred with an update on GO ZERO in six months. For additional details please refer to the [Webcast](#) beginning at 00:49:08.

8. Next Meeting Date

The next Stationary Source Committee meeting is scheduled for Friday, August 15, 2025.

Adjournment

The meeting was adjourned at 11:22 a.m.

Attachments

1. Attendance Record
2. Monthly Permitting Enhancement Program (PEP) Update
3. Monthly Update of Staff's Work with U.S. EPA and CARB on New Source Review Issues for the Transition of RECLAIM Facilities to a Command-and-Control Regulatory Program
4. Notice of Violation Penalty Summary

ATTACHMENT 1

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT STATIONARY SOURCE COMMITTEE

Attendance – June 20, 2025

| | |
|-------------------------------------|---------------------------------------|
| Councilmember Cacciotti | South Coast AQMD Board Member |
| Senator Vanessa Delgado (Ret) | South Coast AQMD Board Member |
| Mayor Pro Tem Larry McCallon | South Coast AQMD Board Member |
| | |
| Lorraine Lundquist | Board Consultant (Mitchell) |
| Debra Mendelsohn | Board Consultant (McCallon/Rodriguez) |
| | |
| Kevin Abernathy | Milk Producers Council |
| Chris Chavez | Coalition for Clean Air |
| Casey Corliss | Orange County Waste and Recycling |
| Ayn Craciun | Climate Action Campaign |
| Harvey Eder | Public Solar Power Coalition |
| Michael Rochmes | US Green Building Council |
| | |
| Barbara Baird | South Coast AQMD staff |
| Cindy Bustillos | South Coast AQMD staff |
| Scott Gallegos | South Coast AQMD staff |
| Bayron Gilchrist | South Coast AQMD staff |
| De Groeneveld | South Coast AQMD staff |
| Sheri Hanizavareh | South Coast AQMD staff |
| Anissa (Cessa) Heard-Johnson | South Coast AQMD staff |
| Aaron Katzenstein | South Coast AQMD staff |
| Angela Kim | South Coast AQMD staff |
| Michael Krause | South Coast AQMD staff |
| Howard Lee | South Coast AQMD staff |
| Jason Low | South Coast AQMD staff |
| Terrence Mann | South Coast AQMD staff |
| Ian MacMillan | South Coast AQMD staff |
| Nahal Mogharabi | South Coast AQMD staff |
| Ron Moskowitz | South Coast AQMD staff |
| Ghislain Muberwa | South Coast AQMD staff |
| Susan Nakamura | South Coast AQMD staff |
| Wayne Nastri | South Coast AQMD staff |
| Sarah Rees | South Coast AQMD staff |
| Walter Shen | South Coast AQMD staff |
| Alberto Silva | South Coast AQMD staff |
| Lisa Tanaka | South Coast AQMD staff |
| Brian Tomasovic | South Coast AQMD staff |
| Mei Wang | South Coast AQMD staff |
| Jillian Wong | South Coast AQMD staff |
| Victor Yip | South Coast AQMD staff |

Monthly Permitting Enhancement Program (PEP) Update
South Coast AQMD
Stationary Source Committee – June 20, 2025

Background

At the February 2, 2024 Board meeting, the Board directed staff to provide monthly updates to the Stationary Source Committee to report progress made under the Permitting Enhancement Program (PEP). The Chair's PEP initiative was developed to enhance the permitting program and improve permitting inventory and timelines. This report provides a summary of the pending permit application inventory, monthly production, and other PEP related activities.

Summary

Pending Permit Application Inventory

The permitting process consists of a constant stream of incoming applications and outgoing application issuances, rejections, and denials. The remainder of the applications are considered the pending application inventory. The inventory consists of applications that are being prescreened prior to being accepted, workable applications, and non-workable applications. Non-workable means that staff are unable to proceed with processing an application because it is awaiting actions to address various regulatory requirements or deficiencies. As an example, after staff issues a Permit to Construct to a facility, staff must wait for the facility to construct and test the equipment prior to issuing a final Permit to Operate. Once a final Permit to Operate is issued, the permit application is removed from the pending application inventory. Other examples include facilities that may be in violation of rules and cannot be permitted until a facility achieves compliance, staff awaiting additional information from facilities, or facilities that have not completed the CEQA process for their project. During the life of an application, it may switch several times between being workable and non-workable as actions are taken by facilities and staff. Attachment 1 contains more detailed descriptions of the categories of non-workable permit applications. Figure 1 below provides monthly snapshots of the pending application inventory from this month and last month.

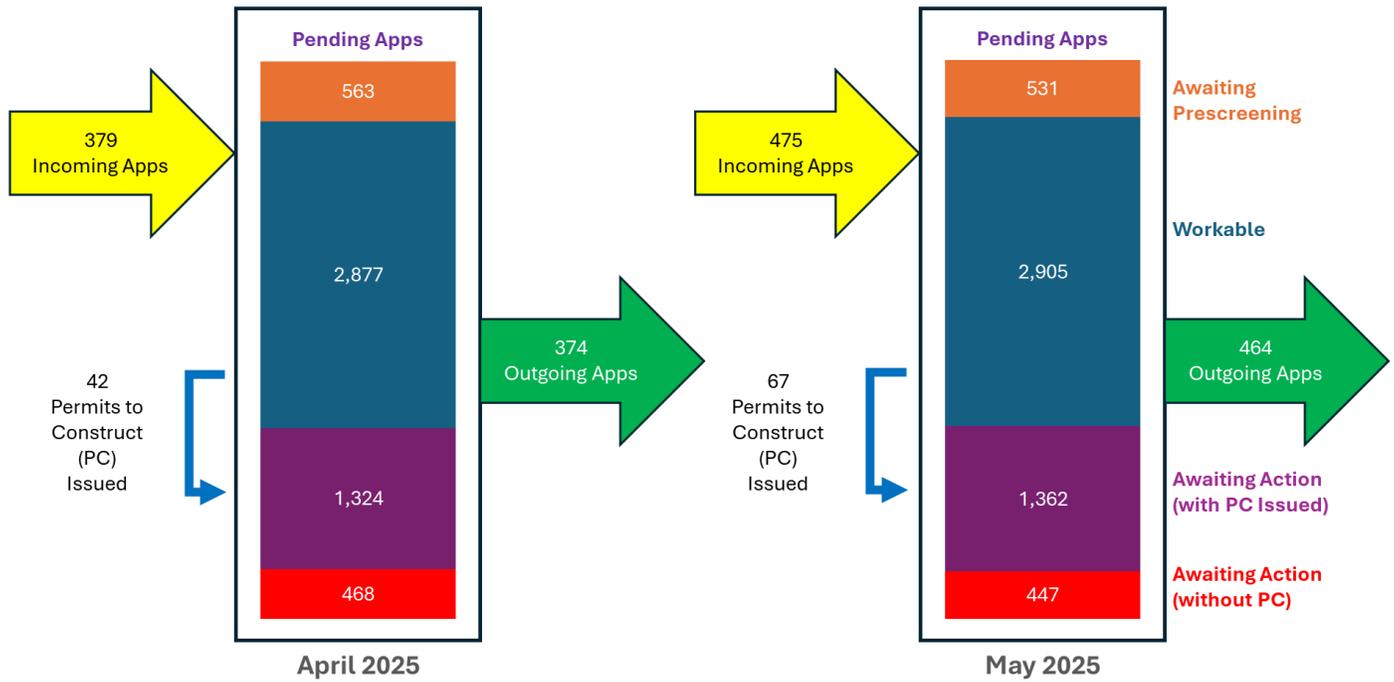


Figure 1: Application Processing Workflow – April and May 2025

Table 1 below lists the categories included in Awaiting Action (Non-Workable) for the last month. Please note that Table 1 provides a snapshot of data and applications may change status several times before final action. Multiple categories may apply to a single application, so the category totals in Table 1 may exceed the number of applications in Figure 1.

Table 1: Awaiting Action (Non-Workable) Application Category Summary

| Awaiting Action (Non-Workable) Categories* | Without PC Issued | | | | With PC Issued | | | |
|--|-------------------|----------|----------|----------|----------------|----------|----------|----------|
| | Feb 2025 | Mar 2025 | Apr 2025 | May 2025 | Feb 2025 | Mar 2025 | Apr 2025 | May 2025 |
| Additional Information from Facility | 282 | 235 | 284 | 262 | 23 | 26 | 24 | 22 |
| CEQA Completion | 29 | 29 | 30 | 33 | - | - | - | - |
| Completion of Construction | 1 | - | - | - | 1,162 | 1,192 | 1,190 | 1,234 |
| Facility Compliance Resolution | 22 | 28 | 20 | 24 | - | - | - | 2 |
| Facility Draft Permit Review | 63 | 43 | 29 | 30 | - | - | - | 1 |
| <i>Initial Review**</i> | 63 | 43 | 29 | 21 | - | - | - | - |
| <i>Supplemental Review**</i> | ** | ** | ** | 9 | ** | ** | ** | 1 |
| Fee Payment Resolution | 4 | 3 | 2 | 2 | - | - | - | - |
| Other Agency Review | 73 | 40 | 44 | 46 | 3 | 3 | 4 | 3 |
| Other Facility Action | - | - | 3 | - | 1 | 1 | 1 | 1 |
| Other South Coast AQMD Review | - | - | - | - | - | - | - | - |
| Public Notice Completion | 21 | 34 | 56 | 37 | - | - | - | 2 |
| Source Test Completion | 22 | 26 | 22 | 25 | 115 | 113 | 105 | 97 |

*Please see Attachment 1 for more information on these categories.

**New categories added to differentiate draft permits that include prolonged review by the applicant as further detailed in Attachment 1.

Not reflected in Figure 1 are an additional 12 applications processed through the online permitting system, which did not impact the permit application inventory. Staff has automated the permitting process for certain equipment allowing staff to focus their efforts on other permit applications. These 12 permit completions are reflected in Figure 2 below.

While the outgoing applications (green arrow) plus permits to construct issued (blue arrow) were greater than prescreened applications plus incoming applications (yellow arrow) this month, the number of workable applications in the inventory increased as additional applications awaiting action became workable. For more detailed information, the past Monthly PEP Updates may be accessed in Attachment 2.

The inventory of Awaiting Action applications has steadily increased. Most of the Awaiting Action applications have a Completion of Construction status. From March 2024 to May 2025, staff issued many Permits to Construct, thereby increasing the Completion of Construction status from 770 to 1,234, including 67 Permits to Construct issued in May. Staff must wait for construction of the equipment to be completed prior to moving forward on these applications.

The rate of incoming applications is unpredictable and is dependent on business demands and the economic climate, as well as South Coast AQMD rule requirements. Maintaining the average production rate of outgoing applications greater than average rate of incoming

applications is key to reducing the pending application inventory until a manageable working inventory is established. Typically, a spike in incoming applications occurs in June each year due to the permit application fee increases on July 1. This typically results in a temporary swell in the inventory as more time is needed to address the surge of permit applications.

Maintaining a low vacancy rate with trained and experienced permitting staff is the biggest factor in maintaining high production and reducing the pending application inventory. In addition, data and analysis showed that addressing vacancies at the Senior and Supervising AQ Engineers was vital since these positions are the review and approval stages of the permitting process.

Production

Prior to staff retirements, permit production levels in 2020 were typically above 500 completions per month. Prior to PEP implementation, high vacancy rates resulted in decreased permit completions. Lower production rates nearing 400 completions per month occurred as the vacancy rate peaked. As the vacancies have been reduced and staff have been trained, production has increased. Figure 2 below shows a rolling 12-month average of application completions and the monthly production for the last six months. For most of the last year, increased monthly production levels (orange circles) are raising the rolling 12-month production averages (black line) in the chart below as compared to the period before PEP. The rolling 12-month average includes the monthly totals from the last year to visualize the trend over time, as production in individual months often fluctuates (in addition to fluctuations in incoming application submittals). The current rolling 12-month average production rate is 498 completions per month. A higher rolling 12-month average will indicate sustained higher production levels. These higher production levels will begin to reduce the pending application inventory and improve permit processing times. A new fiscal year (FY) goal was set to increase production by 500 completions as compared to 2023. This equates to a soft target of 489 completions per month. The red line in Figure 2 shows this new fiscal year goal. Staff will continue to balance production to meet the FY goal as well as address aged applications awaiting Permits to Construct.

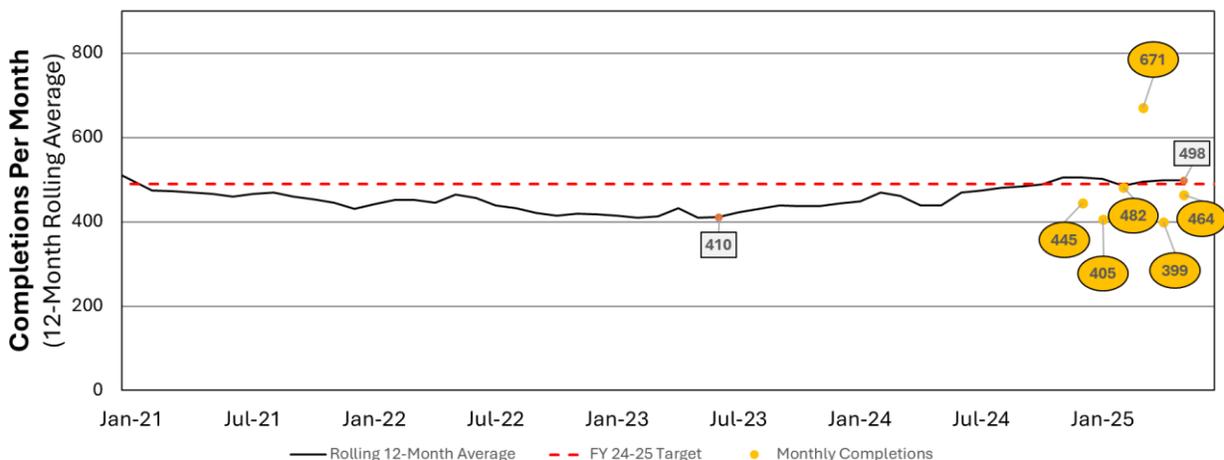


Figure 2: Application Completions - Rolling 12-Month Average and Recent Six Months

Production began to increase in the second half of 2023 as substantial promotions and hiring occurred. New engineering staff were trained and production increased over several months. As staff become more experienced in their duties, they can process more complex projects and become more efficient. Average production is stabilizing at the new increased levels.

Engineering & Permitting (E&P) Vacancy Rate

The current E&P vacancy rate decreased and is now 10.2%. The minimum target vacancy rate for PEP is 10%. When PEP was first announced, the E&P vacancy rate was greater than 20%. Multiple E&P staff retired in March, which increased the vacancy rate. These retirements were anticipated, and a recruitment of engineers was timed to coincide with the retirements. New engineers are now onboarding to reduce the vacancy rate.

Key Activities

- The Best Available Control Technology (BACT) Scientific Review Committee meeting met on June 4 to initiate the next cycle of BACT Guideline updates
- Four Air Quality Engineers onboarded on May 27, plus two Air Quality Engineers onboarded on June 10
- Two more Air Quality Engineers and a Staff Specialist will start in late June and July, with additional offers in progress
- Two student interns joined E&P on May 27 (not included in vacancy rate)
- Staff implemented a streamlining measure to address Rule 404 calculations for certain spray both permit applications
- Staff initiated a production push for end of fiscal year with a focus on the large inventory of applications with Permits to Construct issued.
- Staff is evaluating new reporting methodologies to better characterize and define an application backlog as compared to the working inventory of applications, and will use the data to set new goals

Upcoming Meetings:

- A Permit Streamlining Task Force meeting is scheduled for July 2025.
- Staff met the FY 2024-2025 goal of conducting at least six public meetings. Staff will continue this goal for next FY.

Attachment 1

Explanation of Non-Workable Application Statuses

Workable applications are those applications where staff have the required information to process the permit application.

Non-workable applications are those applications where the application process has been paused while staff are awaiting the resolution of one or more related tasks or where the permit cannot be issued.

Description of Non-Workable/Awaiting Action Terms

Additional Information from Facility

During permit processing staff may need additional information from a facility that was not included in the original permit application package or a change of scope of the proposed project. Additional information may include items regarding materials used in the equipment (such as toxics), equipment information, or other items to perform emission calculations or determine compliance for the proposal in the application.

CEQA Completion

Prior to issuing permits, CEQA requirements are required to be evaluated and completed. South Coast AQMD can either be the Lead Agency that certifies or approves the CEQA document or the Responsible Agency that consults with the Lead Agency (typically a land use agency) on the CEQA document.

Completion of Construction

After a Permit to Construct is issued, the permit application file remains in the pending application inventory. Staff must wait for the facility to complete construction prior to completing other compliance determination steps before the permitting process can continue. Typically, a Permit to Construct is valid for one year, but it may be extended for various reasons if the facility demonstrates they are making increments of progress. For some large projects, construction may take years while the permit application remains in the pending application inventory.

Facility Compliance Resolution

Prior to issuing permits the affected facility must demonstrate compliance with all rules and regulations [Rule 1303(b)(4)]. Prior to the issuance of a Permit to Construct, all major stationary sources that are owned or operated by, controlled by, or under common control in the State of California are subject to emission limitations must demonstrate that they are in compliance or on a schedule for compliance with all applicable emission limitations and standards under the Clean Air Act. [Rule 1303(b)(2)(5)].

Facility Draft Permit Initial Review

If a facility requests to review their draft permit, staff provides the facility a review period prior to proceeding with issuance. During the review period, staff do not perform any additional evaluation until feedback from the facility is received. Some projects include several permits or large facility permit documents which may take substantial time to review.

Facility Draft Permit Supplemental Review

Once staff provides a draft permit to a facility for review, staff is typically ready to proceed with permit issuance based on the proposed draft. If a facility requests revisions to their draft permit, provided additional evaluation is not required, the application continues to be pending until feedback from the facility is resolved. If additional evaluation is required, an additional permit modification application may be required. Some projects include several permits or large facility permit documents which may take substantial time to review. This category was added in May 2025 after experiencing noticeable delays to the permitting process.

Fee Payment Resolution

Prior to issuing permits, all fees must be remitted, including any outstanding fees from associated facility activities including, but not limited to, annual operating and emission fees, modeling or source testing fees, and permit reinstatement fees.

Other Agency Review

The Title V permitting program requires a 45-day review of proposed permitting actions by U.S. EPA prior to many permitting actions. During the review period, staff are unable to proceed with permit issuance. If U.S. EPA has comments or requests additional information, the review stage may add weeks or months to the process before staff can proceed with the project.

For Electricity Generating Facilities (Power Plants), CEC may provide a review of proposed permits prior to issuance.

Other Facility Action

Prior to issuing a permit, a facility may need to take action to address deficiencies or take steps to meet regulatory requirements. This may include acquiring Emission Reduction Credits after staff notifies a facility the project requires emissions to be offset, performing an analysis for Best Available Control Technology requirements, or conducting air dispersion modeling.

Other South Coast AQMD Review

Prior to proceeding with a permit evaluation, permit engineering staff may require assistance and support from other South Coast AQMD departments. For example, IM support for electronic processing due to unique or long-term project considerations or to complete concurrent review of separate phases or integrated processes for multi-phase projects is routinely needed.

Public Notice Completion

There are several South Coast AQMD requirements that may require public noticing and a public participation process prior to permit issuance. Rule 212 and Regulation XXX both detail public noticing thresholds and requirements which include equipment located near schools, high-emitting equipment, equipment above certain health risk thresholds, or significant projects or permit renewals in the Title V program. The public notice period is typically 30 days, and staff are required to respond to all public comments in writing prior to proceeding with the permitting process. Other delays in the public notice process may include delays in distribution of the notice by the facility, incomplete distribution which may require restarting the 30-day period, or requests for extension from the public.

Source Test Completion

Many rules require source testing prior to permit issuance. Source testing is the measurement of actual emissions from a source that may be used to determine compliance with emission limits, or measurements of toxic emissions may be used to perform a health risk assessment. Lab analysis of an air sample is often required as part of the process. The testing is performed by third party contractors who prepare a source test protocol to detail the testing program, and a source test report with the results of the testing and equipment operation. Both the protocol and report need to be reviewed and approved by South Coast AQMD staff.

Attachment 2

Links to Previous Monthly PEP Updates

2024

[April 19, 2024](#) – First Monthly PEP Update

[May 17, 2024](#)

[June 21, 2024](#)

July 2024 – No Stationary Source Committee meeting

[August 16, 2024](#)

[September 20, 2024 - canceled](#)

[October 18, 2024](#)

[November 15, 2024](#)

[December 20, 2024](#)

2025

[January 24, 2025](#)

[February 21, 2025](#)

[March 21, 2025](#)

[April 18, 2025](#)

[May 16, 2025](#)

June 2025 Update on Work with U.S. EPA and California Air Resources Board on New Source Review Issues for the RECLAIM Transition

At the October 5, 2018, Board meeting, the Board directed staff to provide the Stationary Source Committee with a monthly update of staff's work with U.S. EPA regarding resolving NSR issues for the transition of facilities from RECLAIM to a command-and-control regulatory structure. Key activities with U.S. EPA and CARB since the last report are summarized below.

- RECLAIM/NSR Working Group meeting is not planned for June
- The RECLAIM/NSR Working Group will be reconvened when there is information to report

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
General Counsel's Office**

Settlement Penalty Report (05/01/2025 - 05/31/2025)

Total Penalties

Civil Settlement: \$386,738.00
Hearing Board Settlement: \$1,000.00
MSPAP Settlement: \$157,627.00

Total Cash Settlements: \$545,365.00

Total SEP Value: \$0.00

Fiscal Year through 05/31/2025 Cash Total: \$8,411,650.67

Fiscal Year through 05/31/2025 SEP Value Only Total: \$0.00

| Fac ID | Company Name | Rule Number | Settled Date | Init | Notice Nbrs | Total Settlement |
|--------------|---|--|--------------|------|---|------------------|
| Civil | | | | | | |
| 201719 | APPLIED INDUSTRIAL TECHNOLOGIES | 2305 | 05/22/2025 | RM | O15180 | \$5,000.00 |
| 197024 | CENTRAL GARDEN & PET | 2305 | 05/01/2025 | SP | O15292 | \$15,840.00 |
| 151194 | D H L GLOBAL FORWARDING | 2305 | 05/20/2025 | RM | O15210 | \$28,600.00 |
| 202570 | DEALER TIRE | 2305 | 05/13/2025 | RM | O15185 | \$5,000.00 |
| 201012 | DENSO | 2305 | 05/21/2025 | RM | O15149 | \$4,000.00 |
| 202593 | DHL | 2305 | 05/13/2025 | RM | O15213 | \$28,600.00 |
| 124570 | FISHERMAN'S PRIDE PROCESS - NEPTUNE FOODS | 2305 | 05/06/2025 | JL | O15162 | \$750.00 |
| 53574 | GARDNER GIBSON | 1113 | 05/06/2025 | EC | P65664 | \$5,300.00 |
| 164610 | GENERAL FINISHES | 1113 | 05/02/2025 | RM | P65665 | \$29,400.00 |
| 203932 | GIGACLOUD TECHNOLOGY INC (USA) | 2305 | 05/23/2025 | SP | O15295 | \$8,000.00 |
| 201716 | GLOBAL ONE LOGISTICS | 2305 | 05/02/2025 | RM | O15100 | \$28,600.00 |
| 189538 | HEMPEL INC (USA) | 1113 | 05/13/2025 | JL | P65667 | \$14,500.00 |
| 124808 | INEOS POLYPROPYLENE LLC | 401, 1173, 2004, 2011, APPENDIX A (2011), 2012, APPENDIX A (2012), 3002, 40 CFR 60.18 | 05/06/2025 | KER | P63847, P68954, P68959, P68963, P68977, P68978, P68984, P68985, P68994, P73513, P73516, P75009, P78807, P79478 | \$87,709.00 |

| Fac ID | Company Name | Rule Number | Settled Date | Init | Notice Nbrs | Total Settlement |
|--------|-----------------------------------|---------------------|--------------|------|------------------------|------------------|
| 181188 | JJ & S ASBESTOS REMOVAL INC | 1403 | 05/13/2025 | ND | P74717 | \$1,249.00 |
| 202581 | LYZZ | 2305 | 05/06/2025 | ND | O15136 | \$13,000.00 |
| 193643 | MAC DAD BUILDERS INC | 1403, 40 CFR 61.145 | 05/06/2025 | DH | P80310 | \$1,500.00 |
| 203039 | MAPEI CORPORATION | 1168 | 05/14/2025 | JL | P74932 | \$31,200.00 |
| 201726 | MULTIQUIP | 2305 | 05/14/2025 | ND | O15126 | \$5,000.00 |
| 202561 | PETCO ANIMAL SUPPLIES STORES INC | 2305 | 05/07/2025 | ND | O15169, O15251, O15437 | \$39,000.00 |
| 203780 | RAZOR USA LLC | 2305 | 05/20/2025 | SP | O15282 | \$15,840.00 |
| 180410 | REICHHOLD LLC 2 | 1147 | 05/09/2025 | RM | P73172 | \$6,250.00 |
| 200142 | SOUTHWEST LANDSCAPE & MAINTENANCE | 403, 403.1 | 05/06/2025 | RM | P75247 | \$2,000.00 |
| 203218 | WALTERS WHOLESALE ELECTRIC CO | 2305 | 05/20/2025 | SP | O15233 | \$10,400.00 |

Total Civil Settlements: \$386,738.00

| Hearing Board | | | | | | |
|---------------|--------------------------|-----------------|------------|-----|--------|------------|
| 146536 | WALNUT CREEK ENERGY, LLC | 203, 2004, 3002 | 05/06/2025 | KCM | 6230-6 | \$1,000.00 |

Total Hearing Board Settlements: \$1,000.00

| MSPAP | | | | | | |
|--------|---|------------------|------------|----|--------|------------|
| 79776 | 2000 C STORE INC | 461, H&S 41960.2 | 05/06/2025 | VB | P73531 | \$4,945.00 |
| 168037 | 7 ELEVEN INC (#33552) | 201 | 05/23/2025 | VB | P80974 | \$1,049.00 |
| 129216 | ALLEN INDUSTRIAL & MACHINE | 203, 1469 | 05/16/2025 | CL | P80320 | \$8,118.00 |
| 190518 | AMERICAN PLUS INC | 1403 | 05/16/2025 | CM | P81151 | \$2,872.00 |
| 155225 | AMERICAN ROYAL PETROLEUM INC | 203, 461 | 05/16/2025 | CM | P80243 | \$1,573.00 |
| 174623 | ARCO (#42039) | 461, H&S 41960.2 | 05/13/2025 | SW | P73544 | \$1,428.00 |
| 169428 | B & F METAL FINISHING | 203, 1107 | 05/02/2025 | CL | P81509 | \$5,620.00 |
| 206933 | C.W. DRIVER | 403 | 05/16/2025 | VB | P79979 | \$1,993.00 |
| 31367 | CALIFORNIA WATER SERVICE CO | 461 | 05/13/2025 | CM | P74896 | \$1,793.00 |
| 153969 | CARSON UNION 76 | 461, H&S 41960.2 | 05/13/2025 | SW | P73534 | \$1,678.00 |
| 118064 | CIRCLE K STORES INC (#489) | 461 | 05/16/2025 | CL | P80973 | \$1,149.00 |
| 96220 | CITY OF LA - DEPARTMENT OF RECREATION & PARKS | 203, 461 | 05/13/2025 | CM | P75914 | \$3,321.00 |
| 203351 | COAST ABATEMENT SERVICES INC | 1403 | 05/13/2025 | CM | P78643 | \$6,294.00 |
| 112684 | COASTLINE HIGH PERFORMANCE COATINGS LTD | 1402 | 05/02/2025 | CL | P73836 | \$2,198.00 |
| 172250 | CORONA FUELING & ELECTRIC INC | 1166 | 05/02/2025 | CL | P80648 | \$3,297.00 |
| 23043 | CALIFORNIA STATE UNIVERSITY - SAN BERNARDINO | 203 | 05/16/2025 | CL | P73924 | \$3,027.00 |
| 3721 | DART CONTAINER CORP OF CALIFORNIA | 2012 | 05/02/2025 | CL | P78920 | \$7,942.00 |
| 144430 | DOWNEY SHELL | 461, H&S 41960.2 | 05/16/2025 | CM | P80211 | \$1,565.00 |
| 205810 | FOOD MART AND CHURCH'S CHICKEN | 201 | 05/23/2025 | CL | P80969 | \$1,049.00 |

| Fac ID | Company Name | Rule Number | Settled Date | Init | Notice Nbrs | Total Settlement |
|--|--|---------------------|--------------|------|-------------|------------------|
| 201806 | GIGACLOUD TECHNOLOGY INC - CALIFORNIA (#5) | 2305 | 05/02/2025 | CM | O15226 | \$8,360.00 |
| 142311 | GREENCYCLE | 203, 1133 | 05/02/2025 | CL | P79951 | \$2,198.00 |
| 138706 | HEALTHCARE REALTY SERVICES | 203 | 05/23/2025 | CM | P79860 | \$1,009.00 |
| 186552 | HIGHMEL INC (DBA "MELROSE MOBIL") | 461, H&S 41960.2 | 05/06/2025 | VB | P80911 | \$3,027.00 |
| 188793 | HUNTINGTON ORTHOPEDIC INSTITUTE LLC | 203 | 05/06/2025 | CL | P81651 | \$1,009.00 |
| 175942 | JONES COVEY GROUP INC | 1166 | 05/06/2025 | CL | P80626 | \$3,956.00 |
| 196041 | LA MASTERS COLLISION MOTORSPORTS INC | 203 | 05/23/2025 | CL | P73566 | \$744.00 |
| 174742 | LEE IN KU'S MOBIL | 461, H&S 41960.2 | 05/02/2025 | SW | P73520 | \$6,054.00 |
| 167925 | LEGENDS GOLF CLUB | 461 | 05/16/2025 | VB | P81353 | \$6,369.00 |
| 121612 | MILLION DOLLAR BODY SHOP INC | 203 | 05/13/2025 | CL | P68377 | \$2,000.00 |
| 205347 | NOHO COLLISION CENTER | 109, 203 | 05/06/2025 | VB | P79866 | \$1,813.00 |
| 183658 | PENA DEMOLITION | 1403, 40 CFR 61.145 | 05/06/2025 | VB | P78645 | \$1,186.00 |
| 15031 | SB COUNTY - EPWA COUNTY JAIL | 1146 | 05/23/2025 | CL | P74283 | \$2,772.00 |
| 10167 | SB COUNTY - FACILITIES MANAGEMENT DEPARTMENT | 203 | 05/23/2025 | CM | P74284 | \$2,098.00 |
| 204392 | SAN JACINTO VALLEY ACADEMY | 1403, 40 CFR 61.145 | 05/02/2025 | CL | P80318 | \$6,233.00 |
| 131850 | SHAW DIVERSIFIED SERVICES INC | 2004 | 05/23/2025 | CL | P75637 | \$4,669.00 |
| 112166 | SOUTH WEST OFFSET PRINTING CO INC | 1147 | 05/23/2025 | CM | P81510 | \$7,867.00 |
| 203058 | SSA PACIFIC INC | 2305 | 05/02/2025 | CL | O15153 | \$11,050.00 |
| 152122 | TERRIBLE HERBST INC (#285) | 461 | 05/06/2025 | VB | P79624 | \$4,945.00 |
| 138103 | TRANSCONTINENTAL ONTARIO INC | 3002 | 05/16/2025 | CL | P77955 | \$6,245.00 |
| 203678 | WE THE PEOPLE CONSTRUCTION INC | 1403 | 05/13/2025 | CL | P78128 | \$13,112.00 |
| Total MSPAP Settlements: \$157,627.00 | | | | | | |

**SOUTH COAST AQMD RULES AND REGULATIONS INDEX
FOR MAY 2025 PENALTY REPORT**

REGULATION I - GENERAL PROVISIONS

Rule 109 Recordkeeping for Volatile Organic Compound Emissions

REGULATION II - PERMITS

Rule 201 Permit to Construct

Rule 203 Permit to Operate

REGULATION IV - PROHIBITIONS

Rule 401 Visible Emissions

Rule 403 Fugitive Dust

Rule 403.1 Wind Entrainment of Fugitive Dust

Rule 461 Gasoline Transfer and Dispensing

REGULATION XI - SOURCE SPECIFIC STANDARDS

Rule 1107 Coating of Metal Parts and Products

Rule 1113 Architectural Coatings

Rule 1133 Composting and Related Operations – General Administrative Requirements

Rule 1146 Emissions of Oxides of Nitrogen from Industrial, Institutional and Commercial Boilers, Steam Generators,
and Process Heaters

Rule 1147 NOx Reductions from Miscellaneous Sources

Rule 1166 Volatile Organic Compound Emissions from Decontamination of Soil

Rule 1168 Adhesive and Sealant Applications

Rule 1173 Fugitive Emissions of Volatile Organic Compounds

REGULATION XIV - TOXICS

Rule 1402 Control of Toxic Air Contaminants from Existing Sources

Rule 1403 Asbestos Emissions from Demolition/Renovation Activities

Rule 1469 Hexavalent Chromium Emissions from Chrome Plating and Chromic Acid Anodizing Operations

**SOUTH COAST AQMD RULES AND REGULATIONS INDEX
FOR MAY 2025 PENALTY REPORT**

REGULATION XX - REGIONAL CLEAN AIR INCENTIVES MARKET (RECLAIM)

- Rule 2004 Requirements
- Rule 2011 Requirements for Monitoring, Reporting, and Recordkeeping for Oxides of Sulfur (SOx) Emissions
- Appendix A - Rule 2011
 Protocol for Monitoring, Reporting, and Recordkeeping for Oxides of Sulfur (SOx) Emissions
- Rule 2012 Requirements for Monitoring, Reporting, and Recordkeeping for Oxides of Nitrogen (NOx) Emissions
- Appendix A - Rule 2012
 Protocol for Monitoring, Reporting, and Recordkeeping for Oxides of Nitrogen (NOx) Emissions

REGULATION XXIII - FACILITY BASED MOBILE SOURCE MEASURES

- Rule 2305 Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (Waive) Program

REGULATION XXX - TITLE V PERMITS

- Rule 3002 Requirements

CODE OF FEDERAL REGULATIONS

- 40 CFR 60.18 General control device and work practice requirements
- 40 CFR 61.145 Standards for Demolition and Renovation

CALIFORNIA HEALTH AND SAFETY CODE

- H&S § 41960.2 Gasoline Vapor Recovery
- H&S § 42402 Violation of Emission Limitations – Civil Penalty

CALIFORNIA CODE OF REGULATIONS

- 13 CCR 2485 Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

[↑ Back to Agenda](#)

BOARD MEETING DATE: August 1, 2025

AGENDA NO. 20

REPORT: Technology Committee

SYNOPSIS: The Technology Committee held a hybrid meeting on Friday, June 20, 2025. The following is a summary of the meeting.

RECOMMENDED ACTION:
Receive and file.

Carlos Rodriguez, Chair
Technology Committee

AK:psc

Call to Order

Committee Chair Carlos Rodriguez called the meeting to order at 12:00 p.m.

Roll Call

Committee Members

Present: Mayor Pro Tem Larry McCallon
Supervisor Janet Nguyen
Mayor Pro Tem Carlos Rodriguez, Committee Chair

Absent: Supervisor Curt Hagman
Mayor Patricia Lock Dawson
Board Member Veronica Padilla-Campos

For additional details of the Technology Committee Meeting, please refer to the [Webcast](#).

ACTION ITEMS:

1. Issue Program Announcements for Battery Electric Class 8 Trucks, Cargo Handling Equipment and Charging Infrastructure for INVEST CLEAN Program

Alyssa Yan, Program Supervisor, Technology Advancement Office, presented on the U.S. EPA titled Infrastructure, Vehicles, and Equipment Strategy for Climate, Equity, Air Quality, and National Competitiveness (INVEST CLEAN). The program comprises four incentive measures, including the deployment of battery-electric Class 8 trucks and last-mile freight vehicles, cargo handling equipment, switcher locomotives, and charging infrastructure. Up to \$178,500,000, \$28,000,000, and \$20,600,000 for the Infrastructure, Class 8 Freight Vehicle Deployment and Cargo Handling Equipment Measures, respectively, will be reimbursed from the U.S. EPA INVEST CLEAN grant and administered from the U.S. EPA CPRG Special Revenue Fund (90). SCAG will implement the Last-Mile Freight Program totaling \$50 million in rebates. These actions are to: 1) issue and, if necessary, re-issue Program Announcements for Battery Electric Class 8 Trucks, Cargo Handling Equipment, and Charging Infrastructure under INVEST CLEAN; and 2) authorize the Executive Officer to execute contracts for eligible projects selected through these solicitations from the U.S. EPA CPRG Special Revenue Fund (90). For additional details, please refer to the [Webcast](#) beginning at 3:26.

Adrian Martinez, Earth Justice, supports the INVEST CLEAN Program. For additional details, please refer to the [Webcast](#) beginning at 8:45.

Harvey Eder, Public Solar Power Coalition, stated some difficulties relating to Class 8 heavy-duty vehicles manufactured by BYD. For additional details, please refer to the [Webcast](#) beginning at 9:42.

Committee Chair Rodriguez applauded staff for implementing cleaner technologies for goods movement and looks forward to moving the item forward. For additional details, please refer to the [Webcast](#) beginning at 12:55.

Moved by McCallon; seconded by Nguyen; unanimously approved.

Ayes: McCallon, Nguyen, Rodriguez
Noes: None
Abstain: None
Absent: Hagman, Lock Dawson, Padilla-Campos

2. Issue Program Announcement, Transfer Funds, and Execute Agreements for the CHDV ELECTRIC Program and Amend Awards for the Carl Moyer Program

Tom Lee, Planning and Rules Manager, Technology Advancement Office, presented on a Program Announcement for the “Empowering Local Environmental Change Through Replacing Internal Combustion with Battery Electric Class 6 or 7 Vehicles” (ELECTRIC) which is designed to replace diesel or gasoline-powered Class 6 and 7 freight delivery vehicles with zero-emission vehicles. These actions are to: (1) issue a Program Announcement to solicit projects for ELECTRIC, (2) execute agreements with eligible applicants, (3) appropriate \$75,000 from the General Fund Undesignated (Unassigned) Fund Balance into Information Management’s FY 2025-26 Budget, Services and Supplies and/or Capital Outlays Major Objects for modifying the existing online application system to accept ELECTRIC applications, and (4) authorize the Executive Officer to amend awards and execute contract with Two Brothers Fishery LLC for up to \$200,000 under the Carl Moyer Program Fund (32) and with EV Mill Tenant LLC under the Community Air Protection AB 134 Fund (77). For additional details, please refer to the [Webcast](#) beginning at 13:42.

Mayor McCallon inquired how WAIRE funds will support INVEST CLEAN/ELECTRIC programs. Dr. Katzenstein replied that staff is preparing an RFP to support INVEST CLEAN, which is anticipated to be released in late summer and should coincide with INVEST CLEAN. For the WAIRE RFP, the selected projects will return to the Board for approval. For additional details, please refer to the [Webcast](#) beginning at 18:33.

Committee Chair Rodriguez asked how the information on the programs will be disseminated to reach as many people as possible. Dr. Katzenstein replied that staff will use its listserv that has thousands of fleet subscribers, and for INVEST CLEAN staff will partner with other air districts such as Mojave Desert APCD to expand outreach efforts. For additional details, please refer to the [Webcast](#) beginning at 20:36.

Moved by Hagman; seconded by Lock Dawson; unanimously approved.

Ayes: McCallon, Nguyen, Rodriguez
Noes: None
Abstain: None
Absent: Hagman, Lock Dawson, Padilla-Campos

OTHER MATTERS:

3. Other Business

There was no other business to report.

4. Public Comment Period

There was no public comment to report.

5. Next Meeting Date

The next regular Technology Committee meeting is scheduled for Friday, August 15, 2025, at noon.

Adjournment

The meeting adjourned at 12:20 p.m.

Attachment

Attendance Record

ATTACHMENT

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
TECHNOLOGY COMMITTEE MEETING
Attendance Record – June 20, 2025**

| | |
|--------------------------------------|---|
| Mayor Pro Tem Larry McCallon | South Coast AQMD Board Member |
| Mayor Pro Tem Carlos Rodriguez | South Coast AQMD Board Member |
| Supervisor Janet Nguyen | South Coast AQMD Board Member |
| Debra Mendelsohn | Board Consultant/Assistant (McCallon/Rodriguez) |
| Fred Minassian | Board Consultant/Assistant (Padilla-Campos) |
| Taylor Beadle | Public Member |
| Harvey Eder | Public Solar Power Coalition |
| Chuck Hahn | County of Orange |
| Adrian Martinez | EarthJustice |
| Metzli Perez | Public Member |
| Catherine Smith | Public Member |
| Eric Alvarez | South Coast AQMD Staff |
| Debra Ashby | South Coast AQMD Staff |
| Sam Cao | South Coast AQMD Staff |
| Penny Shaw Cedillo | South Coast AQMD Staff |
| Sheri Hanizavareh | South Coast AQMD Staff |
| Anissa Heard-Johnson | South Coast AQMD Staff |
| Justin Joe | South Coast AQMD Staff |
| Aaron Katzenstein | South Coast AQMD Staff |
| Angela Kim | South Coast AQMD Staff |
| Howard Lee | South Coast AQMD Staff |
| Tom Lee | South Coast AQMD Staff |
| Ron Moskowitz | South Coast AQMD Staff |
| Ghislain Muberwa | South Coast AQMD Staff |
| Susan Nakamura | South Coast AQMD Staff |
| Wayne Nastri | South Coast AQMD Staff |
| Vasileios Papapostolou | South Coast AQMD Staff |
| Robert Paud | South Coast AQMD Staff |
| Marissa Poon | South Coast AQMD Staff |
| Daniel Soto | South Coast AQMD Staff |
| Mei Wang | South Coast AQMD Staff |
| Michelle White | South Coast AQMD Staff |
| Alyssa Yan | South Coast AQMD Staff |

[↑ Back to Agenda](#)

BOARD MEETING DATE: August 1, 2025

AGENDA NO. 21

REPORT: Mobile Source Air Pollution Reduction Review Committee

SYNOPSIS: The Mobile Source Air Pollution Reduction Review Committee held a hybrid meeting on Thursday, June 12, 2025. The following is a summary of the meeting.

RECOMMENDED ACTION:
Receive and file.

Curt Hagman
South Coast AQMD Representative
to MSRC

AK:CR:me

Contract Modification Requests

The MSRC considered two contract modification requests and took the following actions:

1. County of Los Angeles, Contract #ML18060 to purchase 29 light-duty zero emission vehicles, 6 heavy-duty near-zero vehicles and install EV charging stations, approval of eighteen-month term extension; and
2. Geographics, Contract #MS21006 to host and maintain the MSRC website, approval of \$1,800 contract value increase.

Implementation of MOUs with Ports for Electric Vehicle Support Infrastructure

To effectuate projects specified in MOUs between the Port of Long Beach (POLB) and Port of Los Angeles (POLA) and South Coast AQMD on behalf of MSRC, previously the MSRC and South Coast AQMD approved three awards for zero emission drayage truck charging infrastructure projects with funds from POLA/POLB EVSE Infrastructure Projects Special Revenue Fund (92). One of these awards was to Forum Mobility Inc. in an amount not to exceed \$6,000,000 to install EVSE at the Port of Long Beach. After the award, staff were notified that another entity, FM Harbor LLC, now holds title to the charging infrastructure. In order to enhance accountability and enforceability in the administration of the project, it was recommended to approve the

addition of FM Harbor LLC as a party to the proposed agreement. The MSRC considered and approved the addition of FM Harbor LLC as a party to the agreement.

Report on MSRC Extension and Scope Change Decision Process

As requested by MSRC, staff provided an overview of elements impacting the MSRC's decision process for contract extensions and scope changes. Staff reviewed highlights of the MSRC's Policy on Contract Modifications, adopted in February 2022. This includes the potential for the MSRC Contracts Administrator to approve initial extensions up to one year. All other extensions are at the MSRC's discretion. The report also provided updates on practices designed to ensure that the MSRC has early notice of potential issues, including but not limited to a revised contract status report, enhanced contacts with contractors, greater MSRC-TAC engagement, and contract language refinements.

FY 2025-26 Administrative Budget

Every year the MSRC adopts an Administrative Budget for the upcoming fiscal year to ensure costs remain within the limitation, currently 6.25 percent. For FY 2025-26, the MSRC adopted an Administrative Budget in the amount of \$1,011,185, which is \$30,288 below the 6.25 percent cap. Administrative expenditures such as postage and office supplies are not directly drawn from the MSRC fund account, but instead from South Coast AQMD's budget. To cover these expenses, the MSRC approved up to a \$56,000 fund transfer from the AB 2766 Discretionary Fund, Special Fund 23, to South Coast AQMD.

Contracts Administrator's Report

The MSRC AB 2766 Contracts Administrator's report provides a written status report on all open contracts from FY 2011-12 to the present. The Contracts Administrator's Report for April 24 through May 28, 2025 is attached (*Attachment 1*).

Attachment

1. April 24 through May 28, 2025 Contracts Administrator's Report

MSRC Agenda Item No. 2

DATE: June 12, 2025

FROM: Cynthia Ravenstein

SUBJECT: AB 2766 Contracts Administrator's Report

SYNOPSIS: This report covers key issues addressed by MSRC staff, status of open contracts, and administrative scope changes from April 24 to May 28, 2025.

RECOMMENDATION: Receive and file report

WORK PROGRAM IMPACT: None

Contract Execution Status

2021-24 Work Program

On September 2, 2022, the SCAQMD Governing Board approved an award under the Major Event Center Transportation Program. This contract is executed.

On February 3, 2023, the SCAQMD Governing Board approved an award under the Transformative Transportation Strategies & Mobility Solutions Program. This contract is executed.

On June 2, 2023, the SCAQMD Governing Board approved six awards under the Microtransit Service RFP, for zero-emission shared mobility service. These contracts are executed.

On September 1, 2023, the SCAQMD Governing Board approved two awards under the Publicly Accessible Goods Movement Zero Emission Infrastructure Request for Information. One of these contracts will be administered by SCAQMD on behalf of the MSRC, and the other award is conditional upon successful selection of a site developer and operator and securing co-funding commitments. These contracts are under development.

On February 2, 2024, the SCAQMD Governing Board approved allocations for partnership in applications seeking funding under the Carl Moyer Program solicitation. Some of the applications were subsequently awarded funding Carl Moyer funding. To the extent feasible these contracts will be administered by SCAQMD on behalf of the MSRC; these contracts are under development.

2024-27 Work Program

On October 4, 2024, the SCAQMD Governing Board approved an award for programmatic outreach services for the MSRC. This contract is executed.

On December 6, 2024, the SCAQMD Governing Board approved an award for partnership on the West Coast Truck Charging and Fueling Corridor Project. This contract is under development. The SCAQMD Governing Board also approved three allocations for partnership with SCAQMD on technology advancement projects. To the extent feasible these contracts will be administered by SCAQMD on behalf of MSRC; these contracts are under development.

On April 4, 2025, the SCAQMD Governing Board approved an award for hosting and maintenance of the MSRC website. This contract is under development.

Work Program Status

Contract Status Reports for Work Program years with open and/or pending contracts are attached.

FY 2011-12 Work Program Contracts

1 contract is in “Open/Complete” status, having completed all obligations except operations.

FY 2011-12 Invoices Paid

No invoices were paid during this period.

FYs 2012-14 Work Program Contracts

1 contract from this Work Program year is open, and 1 is in “Open/Complete” status.

FYs 2012-14 Invoices Paid

No invoices were paid during this period.

FYs 2014-16 Work Program Contracts

3 contracts from this Work Program year are open, and 9 are in “Open/Complete” status. 1 contract closed during this period: Omnitrans, Contract #MS16120 – Repower 63 Existing Buses.

FYs 2014-16 Invoices Paid

1 invoice in the amount of \$284,150.12 was paid during this period.

FYs 2016-18 Work Program Contracts

14 contracts from this Work Program year are open, and 46 are in “Open/Complete” status. 1 contract was terminated at the contractor’s request: Air Products and Chemicals, Contract #MS18182 – Install Publicly Accessible Hydrogen Fueling Station. The funding associated with this contract reverted to the AB 2766 Discretionary Fund. 2 contracts closed during this period: City of Arcadia, Contract #ML18032 – Purchase 1 Heavy-Duty Near-Zero Emission Vehicle; and City of El Monte, Contract #ML18171 – Purchase 1 Heavy-Duty ZEV and EV Charging Infrastructure. 2 contracts passed into “Open/Complete” status during this period: City of Rancho Cucamonga, Contract #ML18051 – Purchase 6 Light-Duty ZEVs, Install 3 Limited- and 3 Public-Access EV Charging Stations; R.F. Dickson Co., Contract #MS18106 – Expansion of Existing CNG Infrastructure/Mechanic Training.

FYs 2016-18 Invoices Paid

2 invoices totaling \$34,000.00 were paid during this period.

FYs 2018-21 Work Program Contracts

6 contracts from this Work Program year are open, and 8 are in “Open/Complete” status. 1 contract passed into “Open/Complete” status during this period: Volvo Financial Services, Agreement #MS21019 – Lease up to 14 Zero-Emission Trucks and Provide Infrastructure.

FYs 2018-21 Invoices Paid

4 invoices totaling \$169,666.75 were paid during this period.

FYs 2021-24 Work Program Contracts

8 contracts from this Work Program year are open.

FYs 2021-24 Invoices Paid

1 invoice in the amount of \$76,132.30 was paid during this period.

FYs 2024-27 Work Program Contracts

1 contract from this Work Program year is open.

FYs 2024-27 Invoices Paid

No invoices were paid during this period.

Administrative Scope Changes

No administrative scope changes were initiated during the period from April 24 to May 28, 2025.

Attachments

- FY 2011-12 through FYs 2021-27 Contract Status Reports



Contract Term Status Report June 2025

| Concern Level | Status | FY | Contract # | Contractor | Project Description | Contract Value | Current End Date | Comment |
|---------------|--------|-----------|------------|---|--|------------------|------------------|---|
| Moderate | Open | 2016-2018 | ML18060 | County of Los Angeles Internal Services Department | Purchase 29 Light-Duty Zero Emission Vehicles, 1 Med/Heavy Duty ZEV, 6 Heavy-Duty Near-Zero Vehicles and Install EV Charging Station | \$ 1,273,938.00 | 8/4/2028 | Modification request on MSRC-TAC June agenda. |
| Moderate | Open | 2016-2018 | ML18068 | City of Mission Viejo | Purchase 2 Light-Duty ZEVs & Install EVSE | \$ 86,940.00 | 6/29/2029 | Overdue for progress report; update requested. |
| Moderate | Open | 2016-2018 | ML18078 | County of Riverside | Purchase 15 Heavy-Duty Vehicles | \$ 375,000.00 | 10/4/2030 | No ext. clause. Last prog. report not very specific about timeline; update promised |
| Moderate | Open | 2016-2018 | ML18082 | City of Los Angeles Bureau of Sanitation | Purchase 8 Medium-Duty Vehicles and 8 Limited EV Charging Infrastructures | \$ 900,000.00 | 8/29/2030 | No ext. clause. Prog. report rec'd 5/13/25. City seems to anticipate making deadline but will follow up |
| Moderate | Open | 2016-2018 | ML18145 | City of Los Angeles Dept of Transportation | Provide One Hundred Rebates to Purchasers of Zero-Emission Taxis and Purchase Eleven HD ZEVs | \$ 1,400,000.00 | 12/31/2028 | HD veh complete & paid; update requested re: taxis |
| Moderate | Open | 2018-2021 | MS21006 | Geographics | Hosting & Maintenance of the MSRC Website | \$ 21,421.00 | 9/20/2025 | Status is good, but fund increase might be needed for remainder of term. |
| Moderate | Open | 2021-2024 | MS24005 | City of Huntington Beach | Circuit Transit Rideshare Program | \$ 279,186.00 | 9/1/2026 | Update promised by 6/10/25 |
| Minimal/none | Open | 2012-2014 | MS14057 | Los Angeles County MTA | Implement Various Signal Synchronization Projects | \$ 1,250,000.00 | 10/31/2026 | |
| Minimal/none | Open | 2014-2016 | ML16047 | City of Fontana | Enhance an Existing Class 1 Bikeway | \$ 500,000.00 | 8/5/2025 | |
| Minimal/none | Open | 2014-2016 | ML16075 | City of San Fernando | Install a Class 1 Bikeway | \$ 354,000.00 | 12/26/2024 | |
| Minimal/none | Open | 2014-2016 | ML16127 | City of Yucaipa | Implement a "Complete Streets" Pedestrian Access Project | \$ 174,420.00 | 5/6/2025 | |
| Minimal/none | Open | 2016-2018 | ML18055 | City of Long Beach | Install EV Charging Stations | \$ 529,728.00 | 11/28/2029 | |
| Minimal/none | Open | 2016-2018 | ML18057 | City of Carson | Purchase 5 Zero-Emission Vehicles and Infrastructure | \$ 106,250.00 | 9/15/2027 | |
| Minimal/none | Open | 2016-2018 | ML18067 | City of Pico Rivera | Install EVSE | \$ 83,500.00 | 12/6/2027 | |
| Minimal/none | Open | 2016-2018 | ML18069 | City of Torrance | Purchase 4 Heavy-Duty Near-Zero Emission Vehicles and Install 19 EVSE | \$ 187,400.00 | 12/31/2028 | |
| Minimal/none | Open | 2016-2018 | ML18092 | City of South Pasadena | Procure Two Light-Duty ZEVs and Install EV Charging Station | \$ 50,000.00 | 4/30/2027 | |
| Minimal/none | Open | 2016-2018 | ML18151 | County of San Bernardino Department of Public Works | Purchase Eight Heavy-Duty Near Zero Emission Vehicles | \$ 200,000.00 | 10/24/2029 | |
| Minimal/none | Open | 2016-2018 | ML18152 | County of San Bernardino Flood Control District | Purchase Five Heavy-Duty Near Zero Emission Vehicles | \$ 108,990.00 | 10/10/2029 | |
| Minimal/none | Open | 2016-2018 | MS18181 | San Bernardino County Transportation Authority | Construct Hydrogen Fueling Station | \$ 1,662,000.00 | 9/9/2031 | |
| Minimal/none | Open | 2018-2021 | MS21005 | Southern California Association of Governments | Implement Last Mile Goods Movement Program | \$ 16,751,000.00 | 1/31/2027 | |
| Minimal/none | Open | 2018-2021 | MS21009 | ITS Technologies & Logistics, LLC | Deploy 12 Zero-Emission Yard Tractors | \$ 1,686,900.00 | 4/14/2030 | |



**Contract Term Status Report
June 2025**

| Concern Level | Status | FY | Contract # | Contractor | Project Description | Contract Value | Current End Date | Comment |
|---------------|---------------|-----------|------------|--|--|-----------------|------------------|---------|
| Minimal/none | Open | 2018-2021 | MS21010 | MHX, LLC | Deploy One Zero-Emission Overhead Crane | \$ 569,275.00 | 6/28/2030 | |
| Minimal/none | Open | 2018-2021 | MS21023 | BNSF Railway Company | Install EV Charging Infrastructure | \$ 1,313,100.00 | 4/21/2030 | |
| Minimal/none | Open | 2021-2024 | MS24001 | Los Angeles County MTA | Provide Clean Fuel Bus Service to Dodger Stadium | \$ 1,200,248.00 | 5/31/2028 | |
| Minimal/none | Open | 2021-2024 | MS24002 | South Pasadena Police Department | Procure Zero-Emission Vehicles and Infrastructure | \$ 499,789.00 | 5/15/2030 | |
| Minimal/none | Open | 2021-2024 | MS24003 | Omnitrans | Bloomington Microtransit Service Expansion | \$ 315,278.00 | 10/30/2025 | |
| Minimal/none | Open | 2021-2024 | MS24004 | City of Seal Beach | Circuit Transit Shared Mobility | \$ 162,891.00 | 9/30/2025 | |
| Minimal/none | Open | 2021-2024 | MS24006 | Anaheim Transportation Network | Old Towne Orange Microtransit Service | \$ 322,000.00 | 8/31/2025 | |
| Minimal/none | Open | 2021-2024 | MS24007 | City of Gardena | Gtrans Microtransit Service | \$ 424,134.00 | 8/31/2026 | |
| Minimal/none | Open | 2021-2024 | MS24008 | City of Long Beach | Circuit Transit Mobility Transit Expansion Program | \$ 410,734.00 | 1/31/2026 | |
| Minimal/none | Open | 2024-2027 | MS27001 | Better World Group Advisors | Programmatic Outreach Services | \$ 300,000.00 | 12/31/2027 | |
| Minimal/none | Open/Complete | 2010-2012 | ML12045 | City of Baldwin Park DPW | Install New CNG Station | \$ 400,000.00 | 12/13/2026 | |
| Minimal/none | Open/Complete | 2012-2014 | ML14018 | City of Los Angeles Dept of General Services | Purchase 27 H.D. Nat. Gas Vehicles | \$ 810,000.00 | 2/5/2026 | |
| Minimal/none | Open/Complete | 2014-2016 | ML16017 | City of Long Beach | Purchase 50 Medium-Duty, 17 H.D. Nat. Gas Vehicles, New CNG Station | \$ 1,415,400.00 | 5/4/2029 | |
| Minimal/none | Open/Complete | 2014-2016 | ML16022 | Los Angeles Department of Water and Power | Purchase 8 H.D. Nat. Gas Vehicles | \$ 240,000.00 | 6/4/2028 | |
| Minimal/none | Open/Complete | 2014-2016 | ML16039 | City of Torrance Transit Department | Install Eight Level II EV Chargers | \$ 32,000.00 | 3/27/2026 | |
| Minimal/none | Open/Complete | 2014-2016 | ML16077 | City of Rialto | Pedestrian Access Improvements, Bicycle Lanes, Bicycle Sharing, Outreach | \$ 463,216.00 | 2/2/2026 | |
| Minimal/none | Open/Complete | 2014-2016 | MS16110 | City of Riverside | Expansion of Existing CNG Station and Maintenance Facility Improvements | \$ 270,000.00 | 10/5/2026 | |
| Minimal/none | Open/Complete | 2014-2016 | MS16115 | City of Santa Monica | Repower 30 Transit Buses | \$ 450,000.00 | 7/13/2025 | |
| Minimal/none | Open/Complete | 2014-2016 | MS16121 | Long Beach Transit | Repower 39 and Purchase 1 New Transit Buses with Near-Zero Engines | \$ 600,000.00 | 11/30/2028 | |
| Minimal/none | Open/Complete | 2016-2018 | ML18020 | City of Colton | Purchase One Medium-Duty and One Heavy-Duty ZEVs | \$ 67,881.00 | 4/2/2027 | |
| Minimal/none | Open/Complete | 2016-2018 | ML18031 | City of Diamond Bar | Install EVSE, Purchase up to 2-LD Vehicles | \$ 58,930.00 | 11/6/2027 | |
| Minimal/none | Open/Complete | 2016-2018 | ML18036 | City of Indian Wells | Install EV Charging Stations | \$ 50,000.00 | 5/7/2026 | |
| Minimal/none | Open/Complete | 2016-2018 | ML18038 | City of Anaheim | Purchase 5 Light-Duty ZEVs and Install EVSE | \$ 151,630.00 | 5/4/2026 | |



**Contract Term Status Report
June 2025**

| Concern Level | Status | FY | Contract # | Contractor | Project Description | Contract Value | Current End Date | Comment |
|---------------|---------------|-----------|------------|---|---|----------------|------------------|---------|
| Minimal/none | Open/Complete | 2016-2018 | ML18046 | City of Santa Ana - Public Works Agency - Fleet & Facilities Mgmt | Purchase 6 Light-Duty ZEVs, 9 Heavy-Duty Near-Zero Emission Vehicles and Install EVSE | \$ 359,591.00 | 7/8/2026 | |
| Minimal/none | Open/Complete | 2016-2018 | ML18047 | City of Whittier | Purchase 5 Heavy-Duty Near-Zero Emission Vehicles | \$ 113,910.00 | 1/7/2029 | |
| Minimal/none | Open/Complete | 2016-2018 | ML18050 | City of Irvine | Install EVSE | \$ 302,035.00 | 8/6/2028 | |
| Minimal/none | Open/Complete | 2016-2018 | ML18051 | City of Rancho Cucamonga | Purchase 6 Light-Duty ZEVs, Install 3 Limited Access and 3 Public Access EV Charging Stations | \$ 91,500.00 | 4/30/2030 | |
| Minimal/none | Open/Complete | 2016-2018 | ML18059 | City of Glendale | Install Electric Vehicle Charging Infrastructure | \$ 260,500.00 | 1/31/2028 | |
| Minimal/none | Open/Complete | 2016-2018 | ML18063 | City of Riverside | Expand Existing CNG Station | \$ 50,000.00 | 9/30/2029 | |
| Minimal/none | Open/Complete | 2016-2018 | ML18072 | City of Anaheim | Purchase 9 Light-Duty ZEVs & 2 Med/Hvy-Duty ZEVs | \$ 239,560.00 | 11/17/2026 | |
| Minimal/none | Open/Complete | 2016-2018 | ML18080 | City of Santa Monica | Install EV Charging Stations | \$ 44,289.00 | 9/9/2025 | |
| Minimal/none | Open/Complete | 2016-2018 | ML18081 | City of Beaumont | EV Charging Infrastructure | \$ 31,870.00 | 10/4/2025 | |
| Minimal/none | Open/Complete | 2016-2018 | ML18085 | City of Orange | Purchase Two Heavy-Duty Near-Zero Emission Vehicles | \$ 50,000.00 | 10/11/2026 | |
| Minimal/none | Open/Complete | 2016-2018 | ML18094 | City of Laguna Woods | Install Two EV Charging Ports | \$ 50,000.00 | 10/11/2026 | |
| Minimal/none | Open/Complete | 2016-2018 | ML18100 | City of Brea | Install Twenty-Four Level II EV Charging Stations | \$ 56,500.00 | 12/31/2025 | |
| Minimal/none | Open/Complete | 2016-2018 | ML18134 | City of Los Angeles Dept of General Services | Purchase Two Medium-Duty ZEVs | \$ 116,000.00 | 5/2/2029 | |
| Minimal/none | Open/Complete | 2016-2018 | ML18135 | City of Azusa | Purchase Three Light-Duty ZEVs | \$ 30,000.00 | 12/5/2029 | |
| Minimal/none | Open/Complete | 2016-2018 | ML18143 | City of La Habra | Install Two EV Charging Stations | \$ 80,700.00 | 9/17/2027 | |
| Minimal/none | Open/Complete | 2016-2018 | ML18146 | City of South Gate | Purchase Five Light-Duty ZEVs and Install Six EVSEs | \$ 127,400.00 | 11/30/2026 | |
| Minimal/none | Open/Complete | 2016-2018 | ML18157 | City of Los Angeles Bureau of Street Services | Purchase One Medium-Duty ZEV | \$ 85,000.00 | 5/20/2027 | |
| Minimal/none | Open/Complete | 2016-2018 | ML18159 | City of Rialto | Purchase Nine Light-Duty ZEVs and EV Charging Infrastructure | \$ 135,980.00 | 9/19/2025 | |
| Minimal/none | Open/Complete | 2016-2018 | ML18161 | City of Indio | Purchase 1 Light-Duty Zero Emission and EV Charging Infrastructure | \$ 25,000.00 | 10/2/2025 | |



**Contract Term Status Report
June 2025**

| Concern Level | Status | FY | Contract # | Contractor | Project Description | Contract Value | Current End Date | Comment |
|---------------|---------------|-----------|------------|---------------------------------------|---|-----------------|------------------|---------|
| Minimal/none | Open/Complete | 2016-2018 | ML18162 | City of Costa Mesa | Purchase Three Light-Duty ZEVs and EV Charging Stations | \$ 148,210.00 | 7/9/2026 | |
| Minimal/none | Open/Complete | 2016-2018 | ML18166 | City of Placentia | Purchase One Heavy-Duty Near-Zero Emission Vehicle | \$ 25,000.00 | 5/17/2027 | |
| Minimal/none | Open/Complete | 2016-2018 | MS18027 | City of Gardena | Install New Limited Access CNG, Modify Maintenance Facility and Train Technicians | \$ 350,000.00 | 10/1/2029 | |
| Minimal/none | Open/Complete | 2016-2018 | MS18106 | R.F. Dickson Co., Inc. | Expansion of Existing Infrastructure/Mechanic Training | \$ 265,000.00 | 1/18/2026 | |
| Minimal/none | Open/Complete | 2016-2018 | MS18120 | City of Redondo Beach | Install New Limited-Access CNG Infrastructure | \$ 275,000.00 | 9/30/2025 | |
| Minimal/none | Open/Complete | 2016-2018 | MS18122 | Universal Waste Systems, Inc. | Install New Limited Access CNG Infrastructure | \$ 195,000.00 | 7/31/2027 | |
| Minimal/none | Open/Complete | 2016-2018 | MS18125 | U.S. Venture | Install New Limited-Access CNG Infrastructure | \$ 200,000.00 | 8/8/2025 | |
| Minimal/none | Open/Complete | 2018-2021 | MS21013 | 4 Gen Logistics | Deploy 40 Zero Emission Trucks | \$ 7,000,000.00 | 5/26/2028 | |
| Minimal/none | Open/Complete | 2018-2021 | MS21014 | Green Fleet Systems, LLC | Deploy up to 3 Near Zero Emission Trucks | \$ 300,000.00 | 8/30/2028 | |
| Minimal/none | Open/Complete | 2018-2021 | MS21015 | Premium Transportation Services, Inc. | Deploy up to 15 Near-Zero Emissions Trucks | \$ 1,500,000.00 | 1/2/2028 | |
| Minimal/none | Open/Complete | 2018-2021 | MS21018 | Pac Anchor Transportation, Inc. | Deploy up to 21 Near Zero Emission Trucks | \$ 2,100,000.00 | 8/16/2028 | |
| Minimal/none | Open/Complete | 2018-2021 | MS21019 | Volvo Financial Services | Lease up to 14 Zero-Emission Trucks and Provide Charging Infrastructure | \$ 3,930,270.00 | 12/30/2030 | |



AB2766 Contract Status Report
4/24/2025 - 5/28/2025

| Contract # | Contractor | Start Date | Original End Date | Amended End Date | Contract Value | Remitted | Project Description | Award Balance | Billing Complete? |
|-------------------------------------|---------------------------------------|------------|-------------------|------------------|----------------|---------------|--|---------------|-------------------|
| FY 2011-2012 Contracts | | | | | | | | | |
| <i>Declined/Cancelled Contracts</i> | | | | | | | | | |
| ML12016 | City of Cathedral City | 1/4/2013 | 10/3/2019 | | \$ 60,000.00 | \$ - | CNG Vehicle & Electric Vehicle Infrastr | \$ 60,000.00 | No |
| ML12038 | City of Long Beach Public Works | | | | \$ 26,000.00 | \$ - | Electric Vehicle Charging Infrastructure | \$ 26,000.00 | No |
| ML12040 | City of Duarte | | | | \$ 30,000.00 | \$ - | One Heavy-Duty Nat. Gas Vehicle | \$ 30,000.00 | No |
| ML12044 | County of San Bernardino Public Works | | | | \$ 250,000.00 | \$ - | Install New CNG Station | \$ 250,000.00 | No |
| ML12048 | City of La Palma | 1/4/2013 | 11/3/2018 | | \$ 20,000.00 | \$ - | Two Medium-Duty LPG Vehicles | \$ 20,000.00 | No |
| ML12052 | City of Whittier | 3/14/2013 | 7/13/2019 | | \$ 165,000.00 | \$ - | Expansion of Existing CNG Station | \$ 165,000.00 | No |
| ML12053 | City of Mission Viejo | | | | \$ 60,000.00 | \$ - | EV Charging Infrastructure | \$ 60,000.00 | No |
| ML12090 | City of Palm Springs | 10/9/2015 | 10/8/2021 | 9/8/2025 | \$ 21,163.00 | \$ - | EV Charging Infrastructure | \$ 21,163.00 | No |
| MS12007 | WestAir Gases & Equipment | | | | \$ 100,000.00 | \$ - | Construct New Limited-Access CNG Sta | \$ 100,000.00 | No |
| MS12027 | C.V. Ice Company, Inc. | 5/17/2013 | 11/16/2019 | | \$ 75,000.00 | \$ - | Purchase 3 Medium-Heavy Duty Vehic | \$ 75,000.00 | No |
| MS12030 | Complete Landscape Care, Inc. | | | | \$ 150,000.00 | \$ - | Purchase 6 Medium-Heavy Duty Vehic | \$ 150,000.00 | No |
| MS12067 | Leatherwood Construction, Inc. | 11/8/2013 | 3/7/2017 | | \$ 122,719.00 | \$ - | Retrofit Six Vehicles w/DECS - Showca | \$ 122,719.00 | No |
| MS12070 | Valley Music Travel/CID Entertainment | | | | \$ 99,000.00 | \$ - | Implement Shuttle Service to Coachella | \$ 99,000.00 | No |
| Total = 13 | | | | | | | | | |
| <i>Closed Contracts</i> | | | | | | | | | |
| ML12013 | City of Pasadena | 10/19/2012 | 3/18/2015 | 9/18/2015 | \$ 200,000.00 | \$ 65,065.00 | Electric Vehicle Charging Infrastructure | \$ 134,935.00 | Yes |
| ML12014 | City of Santa Ana - Public Works Ad | 11/8/2013 | 8/7/2020 | 2/7/2022 | \$ 338,000.00 | \$ 255,977.50 | 9 H.D. Nat. Gas & LPG Trucks, EV Cha | \$ 82,022.50 | Yes |
| ML12015 | City of Fullerton | 4/25/2013 | 11/24/2020 | 11/24/2021 | \$ 40,000.00 | \$ 40,000.00 | HD CNG Vehicle, Expand CNG Station | \$ - | Yes |
| ML12017 | City of Los Angeles, Bureau of San | 6/26/2013 | 5/25/2020 | 11/25/2021 | \$ 950,000.00 | \$ 950,000.00 | 32 H.D. Nat. Gas Vehicles | \$ - | Yes |
| ML12018 | City of West Covina | 10/18/2013 | 10/17/2020 | 8/17/2023 | \$ 300,000.00 | \$ 300,000.00 | Expansion of Existing CNG Station | \$ - | Yes |
| ML12019 | City of Palm Springs | 9/6/2013 | 7/5/2015 | | \$ 38,000.00 | \$ 16,837.00 | EV Charging Infrastructure | \$ 21,163.00 | Yes |
| ML12020 | City of Los Angeles Dept of Genera | 9/27/2012 | 3/26/2019 | 3/26/2020 | \$ 450,000.00 | \$ 450,000.00 | 15 H.D. Nat. Gas Vehicles | \$ - | Yes |
| ML12021 | City of Rancho Cucamonga | 9/14/2012 | 1/13/2020 | | \$ 40,000.00 | \$ 40,000.00 | Four Medium-Duty Nat. Gas Vehicles | \$ - | Yes |
| ML12022 | City of La Puente | 12/6/2013 | 6/5/2020 | | \$ 110,000.00 | \$ 110,000.00 | 2 Medium-Duty and Three Heavy-Duty | \$ - | Yes |
| ML12023 | County of Los Angeles Internal Ser | 8/1/2013 | 2/28/2015 | | \$ 250,000.00 | \$ 192,333.00 | EV Charging Infrastructure | \$ 57,667.00 | Yes |
| ML12037 | Coachella Valley Association of Go | 3/14/2013 | 3/13/2014 | | \$ 250,000.00 | \$ 250,000.00 | Street Sweeping Operations | \$ - | Yes |
| ML12039 | City of Redlands | 2/8/2013 | 10/7/2019 | | \$ 90,000.00 | \$ 90,000.00 | Three Heavy-Duty Nat. Gas Vehicles | \$ - | Yes |
| ML12041 | City of Anaheim Public Utilities Dep | 4/4/2014 | 11/3/2015 | 11/3/2017 | \$ 68,977.00 | \$ 38,742.16 | EV Charging Infrastructure | \$ 30,234.84 | Yes |
| ML12042 | City of Chino Hills | 1/18/2013 | 3/17/2017 | | \$ 87,500.00 | \$ 87,500.00 | Expansion of Existing CNG Station | \$ - | Yes |
| ML12043 | City of Hemet | 6/24/2013 | 9/23/2019 | 11/23/2021 | \$ 30,000.00 | \$ 30,000.00 | One Heavy-Duty Nat. Gas Vehicles | \$ - | Yes |
| ML12046 | City of Irvine | 8/11/2013 | 3/10/2021 | | \$ 30,000.00 | \$ 30,000.00 | One Heavy-Duty Nat. Gas Vehicle | \$ - | Yes |
| ML12047 | City of Orange | 2/1/2013 | 1/31/2019 | | \$ 30,000.00 | \$ 30,000.00 | One Heavy-Duty Nat. Gas Vehicle | \$ - | Yes |
| ML12049 | City of Rialto Public Works | 7/14/2014 | 9/13/2015 | | \$ 30,432.00 | \$ 3,265.29 | EV Charging Infrastructure | \$ 27,166.71 | Yes |
| ML12050 | City of Baldwin Park | 4/25/2013 | 4/24/2014 | 10/24/2014 | \$ 402,400.00 | \$ 385,363.00 | EV Charging Infrastructure | \$ 17,037.00 | Yes |
| ML12054 | City of Palm Desert | 9/30/2013 | 2/28/2015 | | \$ 77,385.00 | \$ 77,385.00 | EV Charging Infrastructure | \$ - | Yes |
| ML12055 | City of Manhattan Beach | 3/1/2013 | 12/31/2018 | | \$ 10,000.00 | \$ 10,000.00 | One Medium-Duty Nat. Gas Vehicle | \$ - | Yes |
| ML12056 | City of Cathedral City | 3/26/2013 | 5/25/2014 | | \$ 25,000.00 | \$ 25,000.00 | Regional Street Sweeping Program | \$ - | Yes |
| ML12057 | City of Coachella | 8/28/2013 | 8/27/2019 | 1/27/2022 | \$ 57,456.00 | \$ 57,456.00 | Purchase One Nat. Gas H.D. Vehicle/S | \$ - | Yes |
| ML12066 | City of Manhattan Beach | 1/7/2014 | 4/6/2015 | | \$ 5,900.00 | \$ 5,900.00 | Electric Vehicle Charging Infrastructure | \$ - | Yes |
| ML12091 | City of Bellflower | 10/5/2018 | 10/4/2019 | 6/30/2022 | \$ 100,000.00 | \$ 49,230.44 | EV Charging Infrastructure | \$ 50,769.56 | Yes |



AB2766 Contract Status Report
4/24/2025 - 5/28/2025

| Contract # | Contractor | Start Date | Original End Date | Amended End Date | Contract Value | Remitted | Project Description | Award Balance | Billing Complete? |
|------------|--------------------------------------|------------|-------------------|------------------|----------------|---------------|---|---------------|-------------------|
| MS12001 | Los Angeles County MTA | 7/1/2012 | 4/30/2013 | | \$ 300,000.00 | \$ 211,170.00 | Clean Fuel Transit Service to Dodger S | \$ 88,830.00 | Yes |
| MS12002 | Orange County Transportation Auth | 9/7/2012 | 4/30/2013 | | \$ 342,340.00 | \$ 333,185.13 | Express Bus Service to Orange County | \$ 9,154.87 | Yes |
| MS12003 | Orange County Transportation Auth | 7/20/2012 | 2/28/2013 | | \$ 234,669.00 | \$ 167,665.12 | Implement Metrolink Service to Angel S | \$ 67,003.88 | Yes |
| MS12004 | USA Waste of California, Inc. | 10/24/2013 | 11/23/2019 | | \$ 175,000.00 | \$ 175,000.00 | Construct New Limited-Access CNG S | \$ - | Yes |
| MS12005 | USA Waste of California, Inc. | 10/19/2012 | 8/18/2013 | | \$ 75,000.00 | \$ 75,000.00 | Vehicle Maintenance Facility Modificati | \$ - | Yes |
| MS12006 | Waste Management Collection & R | 10/19/2012 | 8/18/2013 | | \$ 75,000.00 | \$ 75,000.00 | Vehicle Maintenance Facility Modificati | \$ - | Yes |
| MS12008 | Bonita Unified School District | 7/12/2013 | 12/11/2019 | 4/11/2021 | \$ 175,000.00 | \$ 175,000.00 | Construct New Limited-Access CNG S | \$ - | Yes |
| MS12009 | Sysco Food Services of Los Angele | 1/7/2014 | 4/6/2020 | | \$ 150,000.00 | \$ 150,000.00 | Construct New Public-Access LNG Sta | \$ - | Yes |
| MS12010 | Murrieta Valley Unified School Distr | 4/5/2013 | 9/4/2019 | | \$ 242,786.00 | \$ 242,786.00 | Construct New Limited-Access CNG S | \$ - | Yes |
| MS12011 | Southern California Gas Company | 6/14/2013 | 6/13/2019 | 5/28/2021 | \$ 150,000.00 | \$ 150,000.00 | Construct New Public-Access CNG Sta | \$ - | Yes |
| MS12012 | Rim of the World Unified School Dis | 12/20/2012 | 5/19/2014 | | \$ 75,000.00 | \$ 75,000.00 | Vehicle Maintenance Facility Modificati | \$ - | Yes |
| MS12024 | Southern California Gas Company | 6/13/2013 | 12/12/2019 | 11/12/2020 | \$ 150,000.00 | \$ 150,000.00 | Construct New Public-Access CNG Sta | \$ - | Yes |
| MS12025 | Silverado Stages, Inc. | 11/2/2012 | 7/1/2018 | | \$ 150,000.00 | \$ 150,000.00 | Purchase Six Medium-Heavy Duty Veh | \$ - | Yes |
| MS12026 | U-Haul Company of California | 3/14/2013 | 3/13/2019 | | \$ 500,000.00 | \$ 353,048.26 | Purchase 23 Medium-Heavy Duty Vehi | \$ 146,951.74 | Yes |
| MS12028 | Dy-Dee Service of Pasadena, Inc. | 12/22/2012 | 1/21/2019 | | \$ 45,000.00 | \$ 40,000.00 | Purchase 2 Medium-Duty and 1 Medium | \$ 5,000.00 | Yes |
| MS12029 | Community Action Partnership of O | 11/2/2012 | 11/1/2018 | | \$ 25,000.00 | \$ 14,850.00 | Purchase 1 Medium-Heavy Duty Vehic | \$ 10,150.00 | Yes |
| MS12031 | Final Assembly, Inc. | 11/2/2012 | 11/1/2018 | | \$ 50,000.00 | \$ 32,446.00 | Purchase 2 Medium-Heavy Duty Vehic | \$ 17,554.00 | Yes |
| MS12032 | Fox Transportation | 12/14/2012 | 12/13/2018 | | \$ 500,000.00 | \$ 500,000.00 | Purchase 20 Medium-Heavy Duty Vehi | \$ - | Yes |
| MS12033 | Mike Diamond/Phace Management | 12/22/2012 | 12/21/2018 | 6/21/2021 | \$ 148,900.00 | \$ 148,900.00 | Purchase 20 Medium-Heavy Duty Vehi | \$ - | Yes |
| MS12034 | Ware Disposal Company, Inc. | 11/2/2012 | 11/1/2018 | 5/1/2022 | \$ 133,070.00 | \$ 133,070.00 | Purchase 8 Medium-Heavy Duty Vehic | \$ - | Yes |
| MS12035 | Disneyland Resort | 1/4/2013 | 7/3/2019 | | \$ 25,000.00 | \$ 18,900.00 | Purchase 1 Medium-Heavy Duty Vehic | \$ 6,100.00 | Yes |
| MS12036 | Jim & Doug Carter's Automotive/VS | 1/4/2013 | 11/3/2018 | | \$ 50,000.00 | \$ 50,000.00 | Purchase 2 Medium-Heavy Duty Vehic | \$ - | Yes |
| MS12058 | Krisda Inc | 4/24/2013 | 1/23/2019 | | \$ 25,000.00 | \$ 25,000.00 | Repower One Heavy-Duty Off-Road Ve | \$ - | Yes |
| MS12059 | Orange County Transportation Auth | 2/28/2013 | 12/27/2014 | | \$ 75,000.00 | \$ 75,000.00 | Maintenance Facilities Modifications | \$ - | Yes |
| MS12060 | City of Santa Monica | 4/4/2014 | 8/3/2017 | 8/3/2019 | \$ 500,000.00 | \$ 434,202.57 | Implement Westside Bikeshare Progra | \$ 65,797.43 | Yes |
| MS12061 | Orange County Transportation Auth | 3/14/2014 | 3/13/2017 | | \$ 224,000.00 | \$ 114,240.00 | Transit-Oriented Bicycle Sharing Progr | \$ 109,760.00 | Yes |
| MS12062 | Fraser Communications | 12/7/2012 | 5/31/2014 | | \$ 998,669.00 | \$ 989,218.49 | Develop & Implement "Rideshare Thur | \$ 9,450.51 | Yes |
| MS12063 | Custom Alloy Light Metals, Inc. | 8/16/2013 | 2/15/2020 | | \$ 100,000.00 | \$ 100,000.00 | Install New Limited Access CNG Statio | \$ - | Yes |
| MS12064 | Anaheim Transportation Network | 3/26/2013 | 12/31/2014 | | \$ 127,296.00 | \$ 56,443.92 | Implement Anaheim Circulator Service | \$ 70,852.08 | Yes |
| MS12065 | Orange County Transportation Auth | 7/27/2013 | 11/30/2013 | | \$ 43,933.00 | \$ 14,832.93 | Ducks Express Service to Honda Cent | \$ 29,100.07 | Yes |
| MS12068 | Southern California Regional Rail A | 3/1/2013 | 9/30/2013 | | \$ 57,363.00 | \$ 47,587.10 | Implement Metrolink Service to Autoclu | \$ 9,775.90 | Yes |
| MS12069 | City of Irvine | 8/11/2013 | 2/28/2014 | | \$ 45,000.00 | \$ 26,649.41 | Implement Special Transit Service to S | \$ 18,350.59 | Yes |
| MS12071 | Transit Systems Unlimited, Inc. | 5/17/2013 | 12/16/2018 | | \$ 21,250.00 | \$ 21,250.00 | Expansion of Existing CNG Station | \$ - | Yes |
| MS12072 | 99 Cents Only Stores | 4/5/2013 | 9/4/2019 | | \$ 100,000.00 | \$ 100,000.00 | Construct New CNG Station | \$ - | Yes |
| MS12073 | FirstCNG, LLC | 7/27/2013 | 12/26/2019 | | \$ 150,000.00 | \$ 150,000.00 | Construct New CNG Station | \$ - | Yes |
| MS12074 | Arcadia Unified School District | 7/5/2013 | 9/4/2019 | | \$ 175,000.00 | \$ 175,000.00 | Expansion of Existing CNG Infrastructu | \$ - | Yes |
| MS12075 | CR&R Incorporated | 7/27/2013 | 1/26/2021 | 1/26/2022 | \$ 100,000.00 | \$ 100,000.00 | Expansion of Existing CNG Infrastructu | \$ - | Yes |
| MS12076 | City of Ontario, Housing & Municipa | 3/8/2013 | 4/7/2015 | | \$ 75,000.00 | \$ 75,000.00 | Maintenance Facilities Modification | \$ - | Yes |
| MS12078 | Penske Truck Leasing Co., L.P. | 1/7/2014 | 1/6/2016 | | \$ 75,000.00 | \$ 73,107.00 | Maintenance Facility Modifications - Ve | \$ 1,893.00 | Yes |
| MS12080 | City of Pasadena | 11/8/2013 | 8/7/2020 | 2/7/2022 | \$ 225,000.00 | \$ 225,000.00 | Expansion of Existing CNG Infrastructu | \$ - | Yes |
| MS12081 | Penske Truck Leasing Co., L.P. | 1/7/2014 | 1/6/2016 | | \$ 75,000.00 | \$ 75,000.00 | Maintenance Facility Modifications - Sa | \$ - | Yes |
| MS12082 | City of Los Angeles, Bureau of San | 11/20/2013 | 2/19/2021 | 2/19/2023 | \$ 175,000.00 | \$ 175,000.00 | Install New CNG Infrastructure | \$ - | Yes |
| MS12083 | Brea Olinda Unified School District | 7/30/2015 | 2/29/2024 | | \$ 59,454.00 | \$ 59,454.00 | Install New CNG Infrastructure | \$ - | Yes |



AB2766 Contract Status Report
4/24/2025 - 5/28/2025

| Contract # | Contractor | Start Date | Original End Date | Amended End Date | Contract Value | Remitted | Project Description | Award Balance | Billing Complete? |
|------------|-------------------------------------|------------|-------------------|------------------|----------------|---------------|--------------------------------------|---------------|-------------------|
| MS12085 | Bear Valley Unified School District | 4/25/2013 | 6/24/2014 | | \$ 75,000.00 | \$ 75,000.00 | Maintenance Facility Modifications | \$ - | Yes |
| MS12086 | SuperShuttle International, Inc. | 3/26/2013 | 3/25/2019 | | \$ 225,000.00 | \$ 225,000.00 | Purchase 23 Medium-Heavy Duty Vehi | \$ - | Yes |
| MS12087 | Los Angeles County MTA | 8/29/2013 | 11/28/2015 | | \$ 125,000.00 | \$ 125,000.00 | Implement Rideshare Incentives Progr | \$ - | Yes |
| MS12088 | Orange County Transportation Auth | 12/6/2013 | 3/5/2016 | | \$ 125,000.00 | \$ 18,496.50 | Implement Rideshare Incentives Progr | \$ 106,503.50 | Yes |
| MS12089 | Riverside County Transportation Cd | 10/18/2013 | 9/17/2015 | | \$ 249,136.00 | \$ 105,747.48 | Implement Rideshare Incentives Progr | \$ 143,388.52 | Yes |
| MS12Home | Mansfield Gas Equipment Systems | | | | \$ 296,000.00 | \$ - | Home Refueling Apparatus Incentive P | \$ 296,000.00 | Yes |

Total = 74

Closed/Incomplete Contracts

| | | | | | | | | | |
|---------|--------------------------------|-----------|-----------|----------|---------------|------|---|---------------|----|
| ML12051 | City of Bellflower | 2/7/2014 | 2/6/2016 | 5/6/2018 | \$ 100,000.00 | \$ - | EV Charging Infrastructure | \$ 100,000.00 | No |
| MS12077 | City of Coachella | 6/14/2013 | 6/13/2020 | | \$ 225,000.00 | \$ - | Construct New CNG Station | \$ 225,000.00 | No |
| MS12079 | Penske Truck Leasing Co., L.P. | 1/7/2014 | 1/6/2016 | | \$ 75,000.00 | \$ - | Maintenance Facility Modifications - Bo | \$ 75,000.00 | No |
| MS12084 | Airport Mobil Inc. | 12/6/2013 | 5/5/2020 | | \$ 150,000.00 | \$ - | Install New CNG Infrastructure | \$ 150,000.00 | No |

Total = 4

Open/Complete Contracts

| | | | | | | | | | |
|---------|--------------------------|-----------|------------|------------|---------------|---------------|-------------------------|------|-----|
| ML12045 | City of Baldwin Park DPW | 2/14/2014 | 12/13/2020 | 12/13/2026 | \$ 400,000.00 | \$ 400,000.00 | Install New CNG Station | \$ - | Yes |
|---------|--------------------------|-----------|------------|------------|---------------|---------------|-------------------------|------|-----|

Total = 1

FY 2012-2014 Contracts

Open Contracts

| | | | | | | | | | |
|---------|------------------------|-----------|-----------|------------|-----------------|------|--------------------------------------|-----------------|----|
| MS14057 | Los Angeles County MTA | 11/7/2014 | 10/6/2019 | 10/31/2026 | \$ 1,250,000.00 | \$ - | Implement Various Signal Synchroniza | \$ 1,250,000.00 | No |
|---------|------------------------|-----------|-----------|------------|-----------------|------|--------------------------------------|-----------------|----|

Total = 1

Declined/Cancelled Contracts

| | | | | | | | | | |
|---------|--------------------------------|-----------|------------|-----------|---------------|------|--|---------------|----|
| ML14063 | City of Hawthorne | | | | \$ 32,000.00 | \$ - | Expansion of Existing CNG Infrastructu | \$ 32,000.00 | No |
| ML14068 | City of South Pasadena | 9/12/2014 | 10/11/2015 | 1/11/2020 | \$ 10,183.00 | \$ - | Electric Vehicle Charging Infrastructure | \$ 10,183.00 | No |
| ML14069 | City of Beaumont | 3/3/2017 | 3/2/2025 | | \$ 200,000.00 | \$ - | Construct New CNG Infrastructure | \$ 200,000.00 | No |
| MS14035 | Penske Truck Leasing Co., L.P. | | | | \$ 75,000.00 | \$ - | Vehicle Maint. Fac. Modifications - Sun | \$ 75,000.00 | No |
| MS14036 | Penske Truck Leasing Co., L.P. | | | | \$ 75,000.00 | \$ - | Vehicle Maint. Fac. Modifications - La N | \$ 75,000.00 | No |
| MS14038 | Penske Truck Leasing Co., L.P. | | | | \$ 75,000.00 | \$ - | Vehicle Maint. Fac. Modifications - Fon | \$ 75,000.00 | No |
| MS14043 | City of Anaheim | | | | \$ 175,000.00 | \$ - | Expansion of Existing CNG Station | \$ 175,000.00 | No |
| MS14078 | American Honda Motor Co., Inc. | 9/4/2015 | 8/3/2022 | | \$ 150,000.00 | \$ - | New Public Access CNG Station | \$ 150,000.00 | No |
| MS14085 | Prologis, L.P. | | | | \$ 100,000.00 | \$ - | New Limited Access CNG Station | \$ 100,000.00 | No |
| MS14086 | San Gabriel Valley Towing I | | | | \$ 150,000.00 | \$ - | New Public Access CNG Station | \$ 150,000.00 | No |
| MS14091 | Serv-Wel Disposal | | | | \$ 100,000.00 | \$ - | New Limited-Access CNG Infrastructur | \$ 100,000.00 | No |

Total = 11

Closed Contracts

| | | | | | | | | | |
|---------|-------------------------------------|-----------|------------|------------|---------------|---------------|--|-----------|-----|
| ML14010 | City of Cathedral City | 8/13/2014 | 10/12/2015 | | \$ 25,000.00 | \$ 25,000.00 | Street Sweeping Operations | \$ - | Yes |
| ML14011 | City of Palm Springs | 6/13/2014 | 1/12/2016 | | \$ 79,000.00 | \$ 78,627.00 | Bicycle Racks, Bicycle Outreach & Edu | \$ 373.00 | Yes |
| ML14012 | City of Santa Ana - Public Works Ad | 2/13/2015 | 10/12/2021 | 10/12/2022 | \$ 41,220.00 | \$ 41,220.00 | EV Charging and 1 H.D. CNG Vehicle | \$ - | Yes |
| ML14013 | City of Los Angeles, Bureau of San | 10/7/2016 | 2/6/2025 | | \$ 400,000.00 | \$ 400,000.00 | Purchase 14 H.D. Nat. Gas Vehicles | \$ - | Yes |
| ML14014 | City of Torrance | 9/5/2014 | 12/4/2019 | | \$ 56,000.00 | \$ 56,000.00 | EV Charging Infrastructure | \$ - | Yes |
| ML14015 | Coachella Valley Association of Go | 6/6/2014 | 9/5/2015 | | \$ 250,000.00 | \$ 250,000.00 | Street Sweeping Operations | \$ - | Yes |
| ML14016 | City of Anaheim | 4/3/2015 | 9/2/2021 | | \$ 380,000.00 | \$ 380,000.00 | Purchase 2 H.D. Vehicles, Expansion c | \$ - | Yes |
| ML14019 | City of Corona Public Works | 12/5/2014 | 6/4/2020 | 3/6/2023 | \$ 111,518.00 | \$ 111,517.18 | EV Charging, Bicycle Racks, Bicycle Ld | \$ 0.82 | Yes |



AB2766 Contract Status Report
4/24/2025 - 5/28/2025

| Contract # | Contractor | Start Date | Original End Date | Amended End Date | Contract Value | Remitted | Project Description | Award Balance | Billing Complete? |
|------------|------------------------------------|------------|-------------------|------------------|-----------------|-----------------|---|---------------|-------------------|
| ML14022 | County of Los Angeles Department | 10/2/2015 | 5/1/2022 | | \$ 270,000.00 | \$ 270,000.00 | Purchase 9 H.D. Nat. Gas Vehicles | \$ - | Yes |
| ML14023 | County of Los Angeles Department | 10/2/2015 | 9/1/2017 | 3/1/2021 | \$ 230,000.00 | \$ 230,000.00 | Maintenance Fac. Modifications-Westc | \$ - | Yes |
| ML14024 | County of Los Angeles Department | 10/2/2015 | 9/1/2017 | 9/1/2021 | \$ 230,000.00 | \$ 230,000.00 | Maintenance Fac. Modifications-Baldw | \$ - | Yes |
| ML14025 | County of Los Angeles Dept of Pub | 10/2/2015 | 7/1/2018 | 7/1/2024 | \$ 300,000.00 | \$ 300,000.00 | Construct New CNG Station in Malibu | \$ - | Yes |
| ML14026 | County of Los Angeles Dept of Pub | 10/2/2015 | 5/1/2023 | 5/1/2024 | \$ 300,000.00 | \$ 300,000.00 | Construct New CNG Station in Castaic | \$ - | Yes |
| ML14028 | City of Fullerton | 9/5/2014 | 1/4/2022 | | \$ 126,950.00 | \$ 126,950.00 | Expansion of Existing CNG Infrastruct | \$ - | Yes |
| ML14029 | City of Irvine | 7/11/2014 | 6/10/2017 | | \$ 90,500.00 | \$ 71,056.78 | Bicycle Trail Improvements | \$ 19,443.22 | Yes |
| ML14030 | County of Los Angeles Internal Ser | 1/9/2015 | 3/8/2018 | 7/30/2021 | \$ 425,000.00 | \$ 216,898.02 | Bicycle Racks, Outreach & Education | \$ 208,101.98 | Yes |
| ML14031 | Riverside County Waste Managemen | 6/13/2014 | 12/12/2020 | | \$ 90,000.00 | \$ 90,000.00 | Purchase 3 H.D. CNG Vehicles | \$ - | Yes |
| ML14032 | City of Rancho Cucamonga | 1/9/2015 | 1/8/2022 | | \$ 113,990.00 | \$ 104,350.63 | Expansion of Existing CNG Infrasn., Bic | \$ 9,639.37 | Yes |
| ML14033 | City of Irvine | 7/11/2014 | 2/10/2021 | 2/10/2022 | \$ 60,000.00 | \$ 60,000.00 | Purchase 2 H.D. CNG Vehicles | \$ - | Yes |
| ML14034 | City of Lake Elsinore | 9/5/2014 | 5/4/2021 | | \$ 56,700.00 | \$ 56,700.00 | EV Charging Stations | \$ - | Yes |
| ML14049 | City of Moreno Valley | 7/11/2014 | 3/10/2021 | | \$ 105,000.00 | \$ 101,976.09 | One HD Nat Gas Vehicle, EV Charging | \$ 3,023.91 | Yes |
| ML14051 | City of Brea | 9/5/2014 | 1/4/2017 | 7/4/2018 | \$ 450,000.00 | \$ 450,000.00 | Installation of Bicycle Trail | \$ - | Yes |
| ML14054 | City of Torrance | 11/14/2014 | 4/13/2017 | 7/13/2017 | \$ 350,000.00 | \$ 319,908.80 | Upgrade Maintenance Facility | \$ 30,091.20 | Yes |
| ML14055 | City of Highland | 10/10/2014 | 3/9/2018 | 3/9/2019 | \$ 500,000.00 | \$ 489,385.24 | Bicycle Lanes and Outreach | \$ 10,614.76 | Yes |
| ML14056 | City of Redlands | 9/5/2014 | 5/4/2016 | 5/4/2018 | \$ 125,000.00 | \$ 125,000.00 | Bicycle Lanes | \$ - | Yes |
| ML14061 | City of La Habra | 3/11/2016 | 3/10/2022 | | \$ 41,600.00 | \$ 41,270.49 | Purchase Two Heavy-Duty Nat. Gas V | \$ 329.51 | Yes |
| ML14062 | City of San Fernando | 3/27/2015 | 5/26/2021 | 10/31/2023 | \$ 325,679.00 | \$ 325,679.00 | Expand Existing CNG Fueling Station | \$ - | Yes |
| ML14064 | City of Claremont | 7/11/2014 | 7/10/2020 | 1/10/2021 | \$ 60,000.00 | \$ 60,000.00 | Purchase Two Heavy-Duty Nat. Gas V | \$ - | Yes |
| ML14065 | City of Orange | 9/5/2014 | 8/4/2015 | | \$ 10,000.00 | \$ 10,000.00 | Electric Vehicle Charging Infrastructure | \$ - | Yes |
| ML14067 | City of Duarte | 12/4/2015 | 1/3/2023 | 6/3/2024 | \$ 60,000.00 | \$ 60,000.00 | Purchase Two Electric Buses | \$ - | Yes |
| ML14070 | City of Rancho Cucamonga | 9/3/2016 | 12/2/2018 | | \$ 365,245.00 | \$ 326,922.25 | Bicycle Trail Improvements | \$ 38,322.75 | Yes |
| ML14071 | City of Manhattan Beach | 1/9/2015 | 11/8/2018 | | \$ 22,485.00 | \$ 22,485.00 | Electric Vehicle Charging Infrastructure | \$ - | Yes |
| ML14072 | City of Cathedral City | 8/13/2014 | 1/12/2021 | 7/12/2022 | \$ 41,000.00 | \$ 41,000.00 | Install Bicycle Racks & Implement Bicy | \$ - | Yes |
| ML14094 | City of Yucaipa | 6/9/2017 | 6/8/2018 | | \$ 84,795.00 | \$ 84,795.00 | Installation of Bicycle Lanes | \$ - | Yes |
| ML14095 | City of South Pasadena | 1/10/2019 | 7/9/2019 | | \$ 142,096.00 | \$ 134,182.09 | Bicycle Trail Improvements | \$ 7,913.91 | Yes |
| ML14096 | County of Los Angeles Dept of Pub | 5/3/2019 | 12/2/2019 | 3/2/2020 | \$ 74,186.00 | \$ 74,186.00 | San Gabriel Bike Trail Underpass Imprc | \$ - | Yes |
| ML14097 | County of Los Angeles Internal Ser | 9/6/2019 | 9/5/2020 | 9/5/2021 | \$ 104,400.00 | \$ 104,400.00 | Electric Vehicle Charging Infrastructure | \$ - | Yes |
| MS14001 | Los Angeles County MTA | 3/6/2015 | 4/30/2015 | | \$ 1,216,637.00 | \$ 1,199,512.68 | Clean Fuel Transit Service to Dodger S | \$ 17,124.32 | Yes |
| MS14002 | Orange County Transportation Auth | 9/6/2013 | 4/30/2014 | | \$ 576,833.00 | \$ 576,833.00 | Clean Fuel Transit Service to Orange C | \$ - | Yes |
| MS14003 | Orange County Transportation Auth | 8/1/2013 | 4/30/2014 | 10/30/2014 | \$ 194,235.00 | \$ 184,523.00 | Implement Metrolink Service to Angel S | \$ 9,712.00 | Yes |
| MS14004 | Orange County Transportation Auth | 9/24/2013 | 4/30/2014 | | \$ 36,800.00 | \$ 35,485.23 | Implement Express Bus Service to Sol | \$ 1,314.77 | Yes |
| MS14005 | Transit Systems Unlimited, Inc. | 4/11/2014 | 2/28/2016 | | \$ 515,200.00 | \$ 511,520.00 | Provide Expanded Shuttle Service to H | \$ 3,680.00 | Yes |
| MS14007 | Orange County Transportation Auth | 6/6/2014 | 4/30/2015 | | \$ 208,520.00 | \$ 189,622.94 | Implement Special Metrolink Service to | \$ 18,897.06 | Yes |
| MS14008 | Orange County Transportation Auth | 8/13/2014 | 5/31/2015 | | \$ 601,187.00 | \$ 601,187.00 | Implement Clean Fuel Bus Service to C | \$ - | Yes |
| MS14009 | A-Z Bus Sales, Inc. | 1/17/2014 | 12/31/2014 | 3/31/2015 | \$ 388,000.00 | \$ 388,000.00 | Alternative Fuel School Bus Incentive F | \$ - | Yes |
| MS14037 | Penske Truck Leasing Co., L.P. | 4/7/2017 | 6/6/2020 | | \$ 75,000.00 | \$ 75,000.00 | Vehicle Maint. Fac. Modifications - Car | \$ - | Yes |
| MS14039 | Waste Management Collection and | 7/10/2015 | 4/9/2016 | | \$ 75,000.00 | \$ 75,000.00 | Vehicle Maint. Fac. Modifications - Irvin | \$ - | Yes |
| MS14040 | Waste Management Collection and | 7/10/2015 | 4/9/2016 | | \$ 75,000.00 | \$ 75,000.00 | Vehicle Maint. Fac. Modifications - San | \$ - | Yes |
| MS14041 | USA Waste of California, Inc. | 9/4/2015 | 10/3/2021 | | \$ 175,000.00 | \$ 175,000.00 | Limited-Access CNG Station, Vehicle N | \$ - | Yes |
| MS14042 | Grand Central Recycling & Transfe | 6/6/2014 | 9/5/2021 | | \$ 150,000.00 | \$ 150,000.00 | Expansion of Existing CNG Station | \$ - | Yes |
| MS14044 | TIMCO CNG Fund I, LLC | 5/2/2014 | 11/1/2020 | | \$ 150,000.00 | \$ 150,000.00 | New Public-Access CNG Station in Sar | \$ - | Yes |



AB2766 Contract Status Report
4/24/2025 - 5/28/2025

| Contract # | Contractor | Start Date | Original End Date | Amended End Date | Contract Value | Remitted | Project Description | Award Balance | Billing Complete? |
|------------|--|------------|-------------------|------------------|-----------------|-----------------|---|---------------|-------------------|
| MS14045 | TIMCO CNG Fund I, LLC | 6/6/2014 | 12/5/2020 | | \$ 150,000.00 | \$ 150,000.00 | New Public-Access CNG Station in Inglewood | \$ - | Yes |
| MS14046 | Ontario CNG Station Inc. | 5/15/2014 | 5/14/2020 | 11/14/2021 | \$ 150,000.00 | \$ 150,000.00 | Expansion of Existing CNG Infrastructure | \$ - | Yes |
| MS14047 | Southern California Regional Rail Authority | 3/7/2014 | 9/30/2014 | | \$ 49,203.00 | \$ 32,067.04 | Special Metrolink Service to Autoclub | \$ 17,135.96 | Yes |
| MS14048 | BusWest | 3/14/2014 | 12/31/2014 | 5/31/2015 | \$ 940,850.00 | \$ 847,850.00 | Alternative Fuel School Bus Incentive Program | \$ 93,000.00 | Yes |
| MS14052 | Arcadia Unified School District | 6/13/2014 | 10/12/2020 | | \$ 78,000.00 | \$ 78,000.00 | Expansion of an Existing CNG Fueling Station | \$ - | Yes |
| MS14053 | Upland Unified School District | 1/9/2015 | 7/8/2021 | | \$ 175,000.00 | \$ 175,000.00 | Expansion of Existing CNG Infrastructure | \$ - | Yes |
| MS14058 | Orange County Transportation Authority | 11/7/2014 | 4/6/2016 | 4/6/2017 | \$ 1,250,000.00 | \$ 1,250,000.00 | Implement Various Signal Synchronization | \$ - | Yes |
| MS14059 | Riverside County Transportation Authority | 9/5/2014 | 3/4/2018 | 7/4/2023 | \$ 1,250,000.00 | \$ 1,209,969.08 | Implement Various Signal Synchronization | \$ 40,030.92 | No |
| MS14072 | San Bernardino County Transportation Authority | 3/27/2015 | 3/26/2018 | 3/26/2024 | \$ 1,237,500.00 | \$ 1,148,376.17 | Implement Various Signal Synchronization | \$ 89,123.83 | Yes |
| MS14073 | Anaheim Transportation Network | 1/9/2015 | 4/30/2017 | | \$ 221,312.00 | \$ 221,312.00 | Anaheim Resort Circulator Service | \$ - | Yes |
| MS14074 | Midway City Sanitary District | 1/9/2015 | 3/8/2021 | | \$ 250,000.00 | \$ 250,000.00 | Limited-Access CNG Station & Facility | \$ - | Yes |
| MS14075 | Fullerton Joint Union High School District | 7/22/2016 | 11/21/2023 | | \$ 293,442.00 | \$ 293,442.00 | Expansion of Existing CNG Infrastructure | \$ - | Yes |
| MS14076 | Rialto Unified School District | 6/17/2015 | 2/16/2022 | 6/25/2023 | \$ 225,000.00 | \$ 225,000.00 | New Public Access CNG Station | \$ - | Yes |
| MS14077 | County Sanitation Districts of L.A. County | 3/6/2015 | 5/5/2021 | | \$ 175,000.00 | \$ 175,000.00 | New Limited Access CNG Station | \$ - | Yes |
| MS14079 | Waste Resources, Inc. | 9/14/2016 | 8/13/2022 | 10/13/2024 | \$ 100,000.00 | \$ 100,000.00 | New Limited Access CNG Station | \$ - | Yes |
| MS14080 | CR&R Incorporated | 6/1/2015 | 8/31/2021 | 8/31/2022 | \$ 200,000.00 | \$ 200,000.00 | Expansion of Existing CNG Infrastructure | \$ - | Yes |
| MS14081 | CR&R Incorporated | 6/1/2015 | 5/30/2021 | | \$ 175,000.00 | \$ 100,000.00 | Expansion of Existing CNG Infrastructure | \$ 75,000.00 | Yes |
| MS14082 | Grand Central Recycling & Transfer Station | 12/4/2015 | 3/3/2023 | 3/3/2024 | \$ 150,000.00 | \$ 150,000.00 | Construct New Public Access CNG Station | \$ - | Yes |
| MS14083 | Hacienda La Puente Unified School District | 7/10/2015 | 3/9/2022 | 6/9/2023 | \$ 175,000.00 | \$ 175,000.00 | New Limited Access CNG Station | \$ - | Yes |
| MS14084 | US Air Conditioning Distributors | 5/7/2015 | 9/6/2021 | | \$ 100,000.00 | \$ 100,000.00 | Expansion of Existing CNG Infrastructure | \$ - | Yes |
| MS14087 | Orange County Transportation Authority | 8/14/2015 | 4/30/2016 | | \$ 239,645.00 | \$ 195,377.88 | Implement Special Metrolink Service to Autoclub | \$ 44,267.12 | Yes |
| MS14088 | Southern California Regional Rail Authority | 5/7/2015 | 9/30/2015 | | \$ 79,660.00 | \$ 66,351.44 | Special Metrolink Service to Autoclub | \$ 13,308.56 | Yes |
| MS14089 | Top Shelf Consulting, LLC | 1/18/2017 | 8/4/2016 | 3/31/2017 | \$ 200,000.00 | \$ 200,000.00 | Enhanced Fleet Modernization Program | \$ - | Yes |
| MS14090 | City of Monterey Park | 5/7/2015 | 5/6/2021 | | \$ 225,000.00 | \$ 225,000.00 | Expansion of Existing CNG Infrastructure | \$ - | Yes |

Total = 75

Closed/Incomplete Contracts

| | | | | | | | | | |
|---------|---|-----------|------------|-----------|---------------|------|--|---------------|----|
| ML14020 | County of Los Angeles Dept of Public Works | 8/13/2014 | 1/12/2018 | | \$ 150,000.00 | \$ - | San Gabriel Bike Trail Underpass Improvement | \$ 150,000.00 | No |
| ML14021 | Riverside County Regional Park and Recreation | 7/24/2014 | 12/23/2016 | 9/30/2024 | \$ 250,000.00 | \$ - | Bicycle Trail Improvements | \$ 250,000.00 | No |
| ML14027 | County of Los Angeles Dept of Public Works | 10/2/2015 | 5/1/2023 | 8/1/2028 | \$ 492,000.00 | \$ - | Construct New CNG Station in Canyon | \$ 492,000.00 | No |
| ML14050 | City of Yucaipa | 7/11/2014 | 9/10/2015 | 7/1/2016 | \$ 84,795.00 | \$ - | Installation of Bicycle Lanes | \$ 84,795.00 | No |
| ML14060 | County of Los Angeles Internal Services | 10/6/2017 | 1/5/2019 | | \$ 104,400.00 | \$ - | Electric Vehicle Charging Infrastructure | \$ 104,400.00 | No |
| ML14066 | City of South Pasadena | 9/12/2014 | 7/11/2016 | 2/11/2018 | \$ 142,096.00 | \$ - | Bicycle Trail Improvements | \$ 142,096.00 | No |
| ML14093 | County of Los Angeles Dept of Public Works | 8/14/2015 | 1/13/2019 | | \$ 150,000.00 | \$ - | San Gabriel Bike Trail Underpass Improvement | \$ 150,000.00 | No |
| MS14092 | West Covina Unified School District | 9/3/2016 | 12/2/2022 | | \$ 124,000.00 | \$ - | Expansion of Existing CNG Infrastructure | \$ 124,000.00 | No |

Total = 8

Open/Complete Contracts

| | | | | | | | | | |
|---------|--|----------|----------|----------|---------------|---------------|------------------------------------|------|-----|
| ML14018 | City of Los Angeles Dept of General Services | 3/6/2015 | 9/5/2021 | 2/5/2026 | \$ 810,000.00 | \$ 810,000.00 | Purchase 27 H.D. Nat. Gas Vehicles | \$ - | Yes |
|---------|--|----------|----------|----------|---------------|---------------|------------------------------------|------|-----|

Total = 1

FY 2014-2016 Contracts

Open Contracts

| | | | | | | | | | |
|---------|----------------------|------------|-----------|------------|---------------|---------------|-------------------------------------|---------------|-----|
| ML16047 | City of Fontana | 1/6/2017 | 8/5/2019 | 8/5/2025 | \$ 500,000.00 | \$ - | Enhance an Existing Class 1 Bikeway | \$ 500,000.00 | No |
| ML16075 | City of San Fernando | 10/27/2016 | 2/26/2019 | 12/26/2024 | \$ 354,000.00 | \$ 284,150.12 | Install a Class 1 Bikeway | \$ 69,849.88 | Yes |



AB2766 Contract Status Report
4/24/2025 - 5/28/2025

| Contract # | Contractor | Start Date | Original End Date | Amended End Date | Contract Value | Remitted | Project Description | Award Balance | Billing Complete? |
|-------------------------------------|--|------------|-------------------|------------------|-----------------|---------------|--|-----------------|-------------------|
| ML16127 | City of Yucaipa | 11/7/2024 | 5/6/2025 | | \$ 174,420.00 | \$ - | Implement a "Complete Streets" Pedes | \$ 174,420.00 | No |
| Total = 3 | | | | | | | | | |
| <i>Declined/Cancelled Contracts</i> | | | | | | | | | |
| ML16014 | City of Dana Point | | | | \$ 153,818.00 | \$ - | Extend an Existing Class 1 Bikeway | \$ 153,818.00 | No |
| ML16065 | City of Temple City | | | | \$ 500,000.00 | \$ - | Implement a "Complete Streets" Pedes | \$ 500,000.00 | No |
| ML16067 | City of South El Monte | | | | \$ 73,329.00 | \$ - | Implement an "Open Streets" Event | \$ 73,329.00 | No |
| ML16074 | City of La Verne | 7/22/2016 | 1/21/2023 | | \$ 365,000.00 | \$ - | Install CNG Fueling Station | \$ 365,000.00 | No |
| MS16043 | LBA Realty Company LLC | | | | \$ 100,000.00 | \$ - | Install Limited-Access CNG Station | \$ 100,000.00 | No |
| MS16080 | Riverside County Transportation Commission | | | | \$ 1,200,000.00 | \$ - | Passenger Rail Service for Coachella a | \$ 1,200,000.00 | No |
| MS16098 | Long Beach Transit | | | | \$ 198,957.00 | \$ - | Provide Special Bus Service to Stub H | \$ 198,957.00 | No |
| MS16104 | City of Perris | | | | \$ 175,000.00 | \$ - | Expansion of Existing CNG Infrastructu | \$ 175,000.00 | No |
| MS16106 | City of Lawndale | 3/1/2019 | 11/30/2025 | | \$ 175,000.00 | \$ - | Expansion of Existing CNG Infrastructu | \$ 175,000.00 | No |
| MS16107 | Athens Services | | | | \$ 100,000.00 | \$ - | Construct a Limited-Access CNG Statio | \$ 100,000.00 | No |
| MS16108 | VNG 5703 Gage Avenue, LLC | | | | \$ 150,000.00 | \$ - | Construct Public-Access CNG Station i | \$ 150,000.00 | No |
| MS16109 | Sanitation Districts of Los Angeles County | | | | \$ 275,000.00 | \$ - | Expansion of an Existing L/CNG Statio | \$ 275,000.00 | No |
| MS16111 | VNG 925 Lakeview Avenue, LLC | | | | \$ 150,000.00 | \$ - | Construct Public Access CNG Station i | \$ 150,000.00 | No |
| Total = 13 | | | | | | | | | |
| <i>Closed Contracts</i> | | | | | | | | | |
| ML16006 | City of Cathedral City | 4/27/2016 | 4/26/2022 | 4/26/2023 | \$ 25,000.00 | \$ 25,000.00 | Bicycle Outreach | \$ - | Yes |
| ML16007 | City of Culver City Transportation D | 10/6/2015 | 4/5/2023 | | \$ 246,000.00 | \$ 246,000.00 | Purchase 7 H.D. Nat. Gas Vehicles, EV | \$ - | Yes |
| ML16009 | City of Fountain Valley | 10/6/2015 | 2/5/2018 | 5/5/2019 | \$ 46,100.00 | \$ 46,100.00 | Install EV Charging Infrastructure | \$ - | Yes |
| ML16011 | City of Claremont | 10/6/2015 | 6/5/2022 | | \$ 90,000.00 | \$ 90,000.00 | Purchase 3 Heavy-Duty Nat. Gas Vehic | \$ - | Yes |
| ML16012 | City of Carson | 1/15/2016 | 10/14/2022 | | \$ 60,000.00 | \$ 60,000.00 | Purchase 2 Heavy-Duty Nat. Gas Vehic | \$ - | Yes |
| ML16013 | City of Monterey Park | 12/4/2015 | 7/3/2022 | 7/3/2024 | \$ 90,000.00 | \$ 90,000.00 | Purchase 3 Heavy-Duty Nat. Gas Vehic | \$ - | Yes |
| ML16015 | City of Yorba Linda | 3/4/2016 | 11/3/2017 | | \$ 85,000.00 | \$ 85,000.00 | Install Bicycle Lanes | \$ - | Yes |
| ML16016 | City of Los Angeles Dept of Genera | 2/5/2016 | 12/4/2022 | | \$ 630,000.00 | \$ 630,000.00 | Purchase 21 Heavy-Duty Nat. Gas Veh | \$ - | Yes |
| ML16018 | City of Hermosa Beach | 10/7/2016 | 1/6/2023 | | \$ 29,520.00 | \$ 23,768.44 | Purchase 2 M.D. Nat. Gas Vehicles, Bi | \$ 5,751.56 | Yes |
| ML16019 | City of Los Angeles, Dept of Genera | 1/25/2017 | 3/24/2023 | | \$ 102,955.00 | \$ 102,955.00 | Install EV Charging Infrastructure | \$ - | Yes |
| ML16020 | City of Pomona | 4/1/2016 | 2/1/2018 | 8/1/2018 | \$ 440,000.00 | \$ 440,000.00 | Install Road Surface Bicycle Detection | \$ - | Yes |
| ML16021 | City of Santa Clarita | 10/7/2016 | 6/6/2024 | | \$ 49,400.00 | \$ 49,399.00 | Install EV Charging Infrastructure | \$ 1.00 | Yes |
| ML16023 | City of Banning | 12/11/2015 | 12/10/2021 | | \$ 30,000.00 | \$ 30,000.00 | Purchase 1 H.D. Nat. Gas Vehicle | \$ - | Yes |
| ML16024 | City of Azusa | 4/27/2016 | 2/26/2022 | | \$ 30,000.00 | \$ 30,000.00 | Purchase 1 H.D. Nat. Gas Vehicle | \$ - | Yes |
| ML16025 | City of South Pasadena | 6/22/2016 | 4/21/2023 | 2/21/2025 | \$ 130,000.00 | \$ 130,000.00 | Expand Existing CNG Infrastructure | \$ - | Yes |
| ML16026 | City of Downey | 5/6/2016 | 9/5/2017 | | \$ 40,000.00 | \$ 40,000.00 | Install EV Charging Infrastructure | \$ - | Yes |
| ML16027 | City of Whittier | 1/8/2016 | 11/7/2022 | | \$ 30,000.00 | \$ 30,000.00 | Purchase 1 H.D. Nat. Gas Vehicle | \$ - | Yes |
| ML16028 | City of Azusa | 9/9/2016 | 4/8/2018 | | \$ 25,000.00 | \$ 25,000.00 | Enhance Existing Class 1 Bikeway | \$ - | Yes |
| ML16031 | City of Cathedral City | 12/19/2015 | 2/18/2017 | | \$ 25,000.00 | \$ 25,000.00 | Street Sweeping in Coachella Valley | \$ - | Yes |
| ML16032 | City of Azusa | 9/9/2016 | 4/8/2019 | 4/8/2021 | \$ 474,925.00 | \$ 474,925.00 | Implement a "Complete Streets" Pedes | \$ - | Yes |
| ML16033 | Coachella Valley Association of Go | 4/27/2016 | 4/26/2018 | | \$ 250,000.00 | \$ 250,000.00 | Street Sweeping Operations in Coache | \$ - | Yes |
| ML16034 | City of Riverside | 3/11/2016 | 10/10/2018 | 7/10/2020 | \$ 500,000.00 | \$ 500,000.00 | Implement a "Complete Streets" Pedes | \$ - | Yes |
| ML16036 | City of Brea | 3/4/2016 | 12/3/2018 | | \$ 500,000.00 | \$ 500,000.00 | Install a Class 1 Bikeway | \$ - | Yes |
| ML16037 | City of Rancho Cucamonga | 2/5/2016 | 11/4/2022 | | \$ 30,000.00 | \$ 30,000.00 | Purchase One Heavy-Duty Natural Gas | \$ - | Yes |
| ML16038 | City of Palm Springs | 4/1/2016 | 7/31/2022 | 9/30/2022 | \$ 170,000.00 | \$ 60,000.00 | Install Bicycle Lanes & Purchase 2 Hea | \$ 110,000.00 | Yes |



AB2766 Contract Status Report
4/24/2025 - 5/28/2025

| Contract # | Contractor | Start Date | Original End Date | Amended End Date | Contract Value | Remitted | Project Description | Award Balance | Billing Complete? |
|------------|-------------------------------------|------------|-------------------|------------------|-----------------|-----------------|--|---------------|-------------------|
| ML16041 | City of Moreno Valley | 9/3/2016 | 1/2/2021 | 4/2/2024 | \$ 20,000.00 | \$ 20,000.00 | Install EV Charging Infrastructure | \$ - | Yes |
| ML16042 | City of San Dimas | 4/1/2016 | 12/31/2019 | 12/31/2021 | \$ 55,000.00 | \$ 55,000.00 | Install EV Charging Infrastructure | \$ - | No |
| ML16045 | City of Anaheim | 6/22/2016 | 8/21/2019 | | \$ 275,000.00 | \$ 255,595.08 | Maintenance Facility Modifications | \$ 19,404.92 | Yes |
| ML16046 | City of El Monte | 4/1/2016 | 5/31/2021 | 5/31/2023 | \$ 20,160.00 | \$ 14,637.50 | Install EV Charging Infrastructure | \$ 5,522.50 | Yes |
| ML16049 | City of Buena Park | 4/1/2016 | 11/30/2018 | | \$ 429,262.00 | \$ 429,262.00 | Installation of a Class 1 Bikeway | \$ - | Yes |
| ML16050 | City of Westminster | 5/6/2016 | 7/5/2020 | 5/5/2022 | \$ 115,000.00 | \$ 93,925.19 | Installation of EV Charging Infrastructure | \$ 21,074.81 | Yes |
| ML16051 | City of South Pasadena | 2/12/2016 | 1/11/2017 | 12/11/2017 | \$ 320,000.00 | \$ 258,691.25 | Implement "Open Streets" Event with V | \$ 61,308.75 | Yes |
| ML16052 | City of Rancho Cucamonga | 9/3/2016 | 11/2/2019 | 3/31/2021 | \$ 315,576.00 | \$ 305,576.00 | Install Two Class 1 Bikeways | \$ 10,000.00 | Yes |
| ML16053 | City of Claremont | 3/11/2016 | 7/10/2018 | 12/10/2020 | \$ 498,750.00 | \$ 498,750.00 | Implement a "Complete Streets" Pedes | \$ - | Yes |
| ML16054 | City of Yucaipa | 3/26/2016 | 7/26/2018 | 10/25/2019 | \$ 120,000.00 | \$ 120,000.00 | Implement a "Complete Streets" Pedes | \$ - | Yes |
| ML16055 | City of Ontario | 5/6/2016 | 5/5/2022 | | \$ 270,000.00 | \$ 270,000.00 | Purchase Nine Heavy-Duty Natural-Ga | \$ - | Yes |
| ML16056 | City of Ontario | 3/23/2016 | 9/22/2020 | 9/22/2021 | \$ 106,565.00 | \$ 106,565.00 | Expansion of an Existing CNG Station | \$ - | Yes |
| ML16058 | Los Angeles County Department of | 10/7/2016 | 4/6/2024 | | \$ 371,898.00 | \$ 371,898.00 | Purchase 11 H.D. Nat. Gas Vehicles at | \$ - | Yes |
| ML16059 | City of Burbank | 4/1/2016 | 2/28/2022 | | \$ 180,000.00 | \$ 180,000.00 | Purchase 6 H.D. Nat. Gas Vehicles | \$ - | Yes |
| ML16060 | City of Cudahy | 2/5/2016 | 10/4/2017 | | \$ 73,910.00 | \$ 62,480.00 | Implement an "Open Streets" Event | \$ 11,430.00 | Yes |
| ML16061 | City of Murrieta | 4/27/2016 | 1/26/2020 | | \$ 11,642.00 | \$ 9,398.36 | Installation of EV Charging Infrastructu | \$ 2,243.64 | Yes |
| ML16062 | City of Colton | 6/3/2016 | 7/2/2020 | | \$ 21,003.82 | \$ 21,003.82 | Installation of EV Charging Infrastructu | \$ - | Yes |
| ML16063 | City of Glendora | 3/4/2016 | 4/3/2022 | | \$ 30,000.00 | \$ 30,000.00 | Purchase One H.D. Nat. Gas Vehicle | \$ - | Yes |
| ML16064 | County of Orange, OC Parks | 2/21/2017 | 10/20/2018 | | \$ 204,073.00 | \$ 157,632.73 | Implement "Open Streets" Events with | \$ 46,440.27 | Yes |
| ML16066 | City of Long Beach Public Works | 1/13/2017 | 9/12/2018 | | \$ 75,050.00 | \$ 63,763.62 | Implement an "Open Streets" Event | \$ 11,286.38 | Yes |
| ML16068 | Riverside County Dept of Public He | 12/2/2016 | 8/1/2018 | | \$ 171,648.00 | \$ 171,648.00 | Implement "Open Streets" Events with | \$ - | Yes |
| ML16069 | City of West Covina | 3/10/2017 | 6/9/2021 | | \$ 54,199.00 | \$ 54,199.00 | Installation of EV Charging Infrastructu | \$ - | Yes |
| ML16070 | City of Beverly Hills | 2/21/2017 | 6/20/2023 | | \$ 90,000.00 | \$ 90,000.00 | Purchase 3 H.D. Nat. Gas Vehicles | \$ - | Yes |
| ML16071 | City of Highland | 5/5/2017 | 1/4/2020 | 1/4/2023 | \$ 264,500.00 | \$ 264,500.00 | Implement a "Complete Streets" Pedes | \$ - | Yes |
| ML16072 | City of Palm Desert | 3/4/2016 | 1/4/2020 | 1/3/2022 | \$ 56,000.00 | \$ 56,000.00 | Installation of EV Charging Infrastructu | \$ - | Yes |
| ML16073 | City of Long Beach Public Works | 1/13/2017 | 7/12/2017 | | \$ 50,000.00 | \$ 50,000.00 | Implement an "Open Streets" Event | \$ - | Yes |
| ML16076 | City of San Fernando | 2/21/2017 | 8/20/2021 | | \$ 43,993.88 | \$ 43,993.88 | Install EV Charging Infrastructure | \$ - | Yes |
| ML16078 | City of Moreno Valley | 5/6/2016 | 11/5/2017 | 5/5/2018 | \$ 32,800.00 | \$ 31,604.72 | Install Bicycle Infrastructure & Impleme | \$ 1,195.28 | Yes |
| ML16079 | City of Yucaipa | 4/1/2016 | 3/31/2020 | | \$ 5,000.00 | \$ 5,000.00 | Purchase Electric Lawnmower | \$ - | Yes |
| ML16083 | City of El Monte | 4/1/2016 | 4/30/2021 | 4/30/2023 | \$ 57,210.00 | \$ 25,375.60 | Install EV Charging Infrastructure | \$ 31,834.40 | Yes |
| ML16122 | City of Wildomar | 6/8/2018 | 6/7/2019 | | \$ 500,000.00 | \$ 500,000.00 | Install Bicycle Lanes | \$ - | Yes |
| ML16126 | City of Palm Springs | 7/31/2019 | 7/30/2020 | 10/30/2020 | \$ 22,000.00 | \$ 19,279.82 | Install Bicycle Racks, and Implement B | \$ 2,720.18 | Yes |
| MS16001 | Los Angeles County MTA | 4/1/2016 | 4/30/2017 | | \$ 1,350,000.00 | \$ 1,332,039.84 | Clean Fuel Transit Service to Dodger S | \$ 17,960.16 | Yes |
| MS16002 | Orange County Transportation Auth | 10/6/2015 | 5/31/2016 | | \$ 722,266.00 | \$ 703,860.99 | Clean Fuel Transit Service to Orange C | \$ 18,405.01 | Yes |
| MS16003 | Special Olympics World Games Lo | 10/9/2015 | 12/30/2015 | | \$ 380,304.00 | \$ 380,304.00 | Low-Emission Transportation Service f | \$ - | Yes |
| MS16004 | Mineral LLC | 9/4/2015 | 7/3/2017 | 1/3/2018 | \$ 27,690.00 | \$ 9,300.00 | Design, Develop, Host and Maintain M | \$ 18,390.00 | Yes |
| MS16029 | Orange County Transportation Auth | 1/12/2018 | 6/11/2020 | | \$ 836,413.00 | \$ 567,501.06 | TCM Partnership Program - OC Bikew | \$ 268,911.94 | Yes |
| MS16030 | Better World Group Advisors | 12/19/2015 | 12/31/2017 | 12/31/2019 | \$ 271,619.00 | \$ 245,355.43 | Programmatic Outreach Services to the | \$ 26,263.57 | Yes |
| MS16081 | EDCO Disposal Corporation | 3/4/2016 | 10/3/2022 | | \$ 150,000.00 | \$ 150,000.00 | Expansion of Existing Public Access C | \$ - | Yes |
| MS16084 | Transit Systems Unlimited, Inc. | 5/6/2016 | 2/28/2018 | | \$ 565,600.00 | \$ 396,930.00 | Implement Special Shuttle Service from | \$ 168,670.00 | Yes |
| MS16085 | Southern California Regional Rail A | 3/11/2016 | 9/30/2016 | | \$ 78,033.00 | \$ 64,285.44 | Special MetroLink Service to Autoclub | \$ 13,747.56 | Yes |
| MS16086 | San Bernardino County Transporta | 9/3/2016 | 10/2/2021 | | \$ 800,625.00 | \$ 769,021.95 | Freeway Service Patrols | \$ 31,603.05 | Yes |
| MS16087 | Burrtec Waste & Recycling Service | 7/8/2016 | 3/7/2023 | | \$ 100,000.00 | \$ 100,000.00 | Construct New Limited-Access CNG S | \$ - | Yes |



AB2766 Contract Status Report
4/24/2025 - 5/28/2025

| Contract # | Contractor | Start Date | Original End Date | Amended End Date | Contract Value | Remitted | Project Description | Award Balance | Billing Complete? |
|------------------------------------|-------------------------------------|------------|-------------------|------------------|-----------------|-----------------|---|-----------------|-------------------|
| MS16088 | Transit Systems Unlimited, Inc. | 5/12/2017 | 1/11/2023 | | \$ 17,000.00 | \$ 17,000.00 | Expansion of Existing CNG Station | \$ - | Yes |
| MS16089 | Orange County Transportation Auth | 7/8/2016 | 4/30/2017 | | \$ 128,500.00 | \$ 128,500.00 | Implement Special Bus Service to Ange | \$ - | Yes |
| MS16092 | San Bernardino County Transporta | 2/3/2017 | 1/2/2019 | | \$ 242,937.00 | \$ 242,016.53 | Implement a Series of "Open Streets" E | \$ 920.47 | Yes |
| MS16093 | Orange County Transportation Auth | 9/3/2016 | 3/2/2018 | 9/2/2018 | \$ 1,553,657.00 | \$ 1,499,575.85 | Implement a Mobile Ticketing System | \$ 54,081.15 | Yes |
| MS16094 | Riverside County Transportation Co | 1/25/2017 | 1/24/2022 | 2/24/2024 | \$ 1,909,241.00 | \$ 1,635,864.00 | MetroLink First Mile/Last Mile Mobili | \$ 273,377.00 | Yes |
| MS16095 | Orange County Transportation Auth | 7/22/2016 | 5/31/2017 | | \$ 694,645.00 | \$ 672,864.35 | Implement Special Bus Service to Orar | \$ 21,780.65 | Yes |
| MS16096 | San Bernardino County Transporta | 10/27/2016 | 12/26/2019 | 6/30/2021 | \$ 450,000.00 | \$ 450,000.00 | EV Charging Infrastructure | \$ - | Yes |
| MS16097 | Walnut Valley Unified School Distri | 10/7/2016 | 11/6/2022 | | \$ 250,000.00 | \$ 250,000.00 | Expand CNG Station & Modify Mainten | \$ - | Yes |
| MS16099 | Foothill Transit | 3/3/2017 | 3/31/2017 | | \$ 50,000.00 | \$ 50,000.00 | Provide Special Bus Service to the Los | \$ - | Yes |
| MS16100 | Southern California Regional Rail A | 5/5/2017 | 9/30/2017 | | \$ 80,455.00 | \$ 66,169.43 | Provide Metrolink Service to Autoclub | \$ 14,285.57 | Yes |
| MS16102 | Nasa Services, Inc. | 2/21/2017 | 4/20/2023 | | \$ 100,000.00 | \$ 100,000.00 | Construct a Limited-Access CNG Statio | \$ - | Yes |
| MS16103 | Arrow Services, Inc. | 2/3/2017 | 4/2/2023 | | \$ 100,000.00 | \$ 100,000.00 | Construct a Limited-Access CNG Statio | \$ - | Yes |
| MS16105 | Huntington Beach Union High Scho | 3/3/2017 | 7/2/2024 | | \$ 175,000.00 | \$ 175,000.00 | Expansion of Existing CNG Infrastructu | \$ - | Yes |
| MS16112 | Orange County Transportation Auth | 4/14/2017 | 3/13/2024 | | \$ 1,470,000.00 | \$ 1,470,000.00 | Repower Up to 98 Transit Buses | \$ - | Yes |
| MS16113 | Los Angeles County MTA | 5/12/2017 | 4/11/2024 | | \$ 1,875,000.00 | \$ 1,875,000.00 | Repower Up to 125 Transit Buses | \$ - | Yes |
| MS16114 | City of Norwalk | 3/3/2017 | 6/2/2024 | | \$ 32,170.00 | \$ 32,170.00 | Purchase 3 Transit Buses | \$ - | Yes |
| MS16116 | Riverside Transit Agency | 3/3/2017 | 1/2/2023 | | \$ 10,000.00 | \$ 9,793.00 | Purchase One Transit Bus | \$ 207.00 | Yes |
| MS16117 | Omnitrans | 4/21/2017 | 6/20/2023 | | \$ 175,000.00 | \$ 175,000.00 | Expansion of Existing CNG Infrastructu | \$ - | Yes |
| MS16118 | Omnitrans | 4/21/2017 | 6/20/2023 | | \$ 175,000.00 | \$ 175,000.00 | Expansion of Existing CNG Infrastructu | \$ - | Yes |
| MS16119 | Omnitrans | 4/21/2017 | 8/20/2022 | | \$ 150,000.00 | \$ - | New Public Access CNG Station | \$ 150,000.00 | No |
| MS16120 | Omnitrans | 4/7/2017 | 5/6/2025 | | \$ 945,000.00 | \$ 870,000.00 | Repower 63 Existing Buses | \$ 75,000.00 | Yes |
| MS16124 | Riverside County Transportation Co | 12/14/2018 | 12/14/2019 | 5/14/2020 | \$ 253,239.00 | \$ 246,856.41 | Extended Freeway Service Patrols | \$ 6,382.59 | Yes |
| MS16125 | San Bernardino County Transporta | 9/20/2019 | 11/19/2020 | | \$ 1,000,000.00 | \$ 1,000,000.00 | Traffic Signal Synchronization Projects | \$ - | Yes |
| MS16127 | Los Angeles County MTA | 6/29/2021 | | 6/28/2022 | \$ 2,500,000.00 | \$ 2,500,000.00 | Expansion of the Willowbrook/Rosa Pa | \$ - | Yes |
| Total = 92 | | | | | | | | | |
| <i>Closed/Incomplete Contracts</i> | | | | | | | | | |
| ML16005 | City of Palm Springs | 3/4/2016 | 10/3/2017 | | \$ 40,000.00 | \$ - | Install Bicycle Racks, and Implement B | \$ 40,000.00 | No |
| ML16035 | City of Wildomar | 4/1/2016 | 11/1/2017 | | \$ 500,000.00 | \$ - | Install Bicycle Lanes | \$ 500,000.00 | No |
| ML16057 | City of Yucaipa | 4/27/2016 | 1/26/2019 | 1/26/2024 | \$ 380,000.00 | \$ - | Implement a "Complete Streets" Pedes | \$ 380,000.00 | No |
| MS16082 | Riverside County Transportation Co | 9/3/2016 | 8/2/2018 | | \$ 590,759.00 | \$ 337,519.71 | Extended Freeway Service Patrols | \$ 253,239.29 | No |
| MS16090 | Los Angeles County MTA | 10/27/2016 | 4/26/2020 | 10/26/2020 | \$ 2,500,000.00 | \$ - | Expansion of the Willowbrook/Rosa Pa | \$ 2,500,000.00 | No |
| MS16091 | San Bernardino County Transporta | 10/7/2016 | 11/6/2018 | | \$ 1,000,000.00 | \$ - | Traffic Signal Synchronization Projects | \$ 1,000,000.00 | No |
| MS16123 | Orange County Transportation Auth | 12/7/2018 | 11/6/2023 | | \$ 91,760.00 | \$ - | Install La Habra Union Pacific Bikeway | \$ 91,760.00 | No |
| Total = 7 | | | | | | | | | |
| <i>Open/Complete Contracts</i> | | | | | | | | | |
| ML16008 | City of Pomona | 9/20/2016 | 11/19/2022 | 5/19/2025 | \$ 60,000.00 | \$ 60,000.00 | Purchase 3 Medium-Duty and 1 Heavy | \$ - | Yes |
| ML16017 | City of Long Beach | 2/5/2016 | 8/4/2023 | 5/4/2029 | \$ 1,415,400.00 | \$ 1,415,400.00 | Purchase 50 Medium-Duty, 17 H.D. Na | \$ - | Yes |
| ML16022 | Los Angeles Department of Water a | 5/5/2017 | 3/4/2024 | 6/4/2028 | \$ 240,000.00 | \$ 240,000.00 | Purchase 8 H.D. Nat. Gas Vehicles | \$ - | Yes |
| ML16039 | City of Torrance Transit Departmen | 1/6/2017 | 9/5/2022 | 3/27/2026 | \$ 27,392.00 | \$ 27,391.57 | Install Eight Level II EV Chargers | \$ 0.43 | Yes |
| ML16040 | City of Eastvale | 1/6/2017 | 7/5/2022 | 11/5/2026 | \$ 66,409.00 | \$ 66,040.41 | Install EV Charging Infrastructure | \$ 368.59 | Yes |
| ML16077 | City of Rialto | 5/3/2018 | 10/2/2021 | 2/2/2026 | \$ 463,216.00 | \$ 463,216.00 | Pedestrian Access Improvements, Bicy | \$ - | Yes |
| MS16110 | City of Riverside | 10/6/2017 | 2/5/2025 | 10/5/2026 | \$ 270,000.00 | \$ 270,000.00 | Expansion of Existing CNG Station and | \$ - | Yes |
| MS16115 | City of Santa Monica | 4/14/2017 | 7/13/2025 | | \$ 450,000.00 | \$ 450,000.00 | Repower 30 Transit Buses | \$ - | Yes |



AB2766 Contract Status Report
4/24/2025 - 5/28/2025

| Contract # | Contractor | Start Date | Original End Date | Amended End Date | Contract Value | Remitted | Project Description | Award Balance | Billing Complete? |
|-----------------------------|--------------------|------------|-------------------|------------------|----------------|---------------|------------------------------------|---------------|-------------------|
| MS16121 | Long Beach Transit | 11/3/2017 | 4/2/2024 | 11/30/2028 | \$ 600,000.00 | \$ 600,000.00 | Repower 39 and Purchase 1 New Tran | \$ - | Yes |
| Total = 9 | | | | | | | | | |
| <i>Terminated Contracts</i> | | | | | | | | | |
| ML16010 | City of Fullerton | 10/7/2016 | 4/6/2023 | 4/6/2024 | \$ 78,222.00 | \$ 27,896.71 | Install EV Charging Stations | \$ 50,325.29 | Yes |
| ML16048 | City of Placentia | 3/26/2016 | 5/25/2021 | 12/25/2026 | \$ 80,000.00 | \$ 18,655.00 | Install EV Charging Infrastructure | \$ 61,345.00 | Yes |
| Total = 2 | | | | | | | | | |

FY 2016-2018 Contracts

| <i>Open Contracts</i> | | | | | | | | | |
|-------------------------------------|---|------------|------------|------------|-----------------|-----------------|---|-----------------|-----|
| ML18055 | City of Long Beach | 11/29/2018 | 11/28/2026 | 11/28/2029 | \$ 529,728.00 | \$ 339,734.73 | Install EV Charging Stations | \$ 189,993.27 | No |
| ML18057 | City of Carson | 10/5/2018 | 7/4/2023 | 9/15/2027 | \$ 106,250.00 | \$ 50,000.00 | Purchase 5 Zero-Emission Vehicles ar | \$ 56,250.00 | No |
| ML18060 | County of Los Angeles Internal Ser | 10/5/2018 | 8/4/2026 | 8/4/2028 | \$ 1,273,938.00 | \$ 724,868.96 | Purchase 29 Light-Duty Zero Emission | \$ 549,069.04 | No |
| ML18067 | City of Pico Rivera | 9/7/2018 | 11/6/2022 | 12/6/2027 | \$ 83,500.00 | \$ - | Install EVSE | \$ 83,500.00 | No |
| ML18068 | City of Mission Viejo | 7/31/2019 | 6/30/2027 | 6/29/2029 | \$ 86,940.00 | \$ 20,000.00 | Purchase 2 Light-Duty ZEVs & Install E | \$ 66,940.00 | No |
| ML18069 | City of Torrance | 3/1/2019 | 7/31/2027 | 12/31/2028 | \$ 187,400.00 | \$ 100,000.00 | Purchase 4 Heavy-Duty Near-Zero Em | \$ 87,400.00 | No |
| ML18078 | County of Riverside | 10/5/2018 | 10/4/2028 | 10/4/2030 | \$ 375,000.00 | \$ 325,000.00 | Purchase 15 Heavy-Duty Vehicles | \$ 50,000.00 | No |
| ML18082 | City of Los Angeles Bureau of Sanit | 8/30/2019 | 8/29/2028 | 8/29/2030 | \$ 900,000.00 | \$ - | Purchase 8 Medium-Duty Vehicles and | \$ 900,000.00 | No |
| ML18092 | City of South Pasadena | 2/1/2019 | 1/31/2025 | 4/30/2027 | \$ 50,000.00 | \$ 20,000.00 | Procure Two Light-Duty ZEVs and Inst | \$ 30,000.00 | No |
| ML18135 | City of Azusa | 12/6/2019 | 12/5/2029 | | \$ 30,000.00 | \$ 30,000.00 | Purchase Three Light-Duty ZEVs | \$ - | Yes |
| ML18145 | City of Los Angeles Dept of Transp | 1/10/2020 | 4/9/2027 | 12/31/2028 | \$ 1,400,000.00 | \$ 1,100,000.00 | Provide One Hundred Rebates to Purc | \$ 300,000.00 | No |
| ML18151 | County of San Bernardino Departm | 8/25/2020 | 10/24/2029 | | \$ 200,000.00 | \$ 150,000.00 | Purchase Eight Heavy-Duty Near Zero | \$ 50,000.00 | No |
| ML18152 | County of San Bernardino Flood Cd | 8/11/2020 | 10/10/2029 | | \$ 108,990.00 | \$ 75,000.00 | Purchase Five Heavy-Duty Near Zero | \$ 33,990.00 | No |
| MS18181 | San Bernardino County Transporta | 4/10/2023 | 9/9/2030 | 9/9/2031 | \$ 1,662,000.00 | \$ - | Construct Hydrogen Fueling Station | \$ 1,662,000.00 | No |
| Total = 14 | | | | | | | | | |
| <i>Declined/Cancelled Contracts</i> | | | | | | | | | |
| ML18044 | City of Malibu | 8/8/2018 | 10/7/2022 | 10/7/2023 | \$ 50,000.00 | \$ - | Install EV Charging Infrastructure | \$ 50,000.00 | No |
| ML18053 | City of Paramount | 9/7/2018 | 3/6/2023 | | \$ 64,675.00 | \$ - | Install EV Charging Infrastructure | \$ 64,675.00 | No |
| ML18075 | City of Orange | | | | \$ 25,000.00 | \$ - | One Heavy-Duty Vehicle | \$ 25,000.00 | No |
| ML18140 | City of Bell Gardens | 12/14/2018 | 12/13/2028 | | \$ 50,000.00 | \$ - | Purchase Two Heavy-Duty Near-ZEVs | \$ 50,000.00 | No |
| ML18149 | City of Sierra Madre | | | | \$ 50,000.00 | \$ - | Implement Bike Share Program | \$ 50,000.00 | No |
| ML18150 | City of South El Monte | | | | \$ 20,000.00 | \$ - | Implement Bike Share Program | \$ 20,000.00 | No |
| ML18153 | City of Cathedral City | 5/3/2019 | 4/2/2025 | | \$ 52,215.00 | \$ - | Install EV Charging Infrastructure | \$ 52,215.00 | No |
| ML18158 | City of Inglewood | | | | \$ 146,000.00 | \$ - | Purchase 4 Light-Duty Zero Emission, | \$ 146,000.00 | No |
| ML18164 | City of Pomona | | | | \$ 200,140.00 | \$ - | Purchase Three Heavy-Duty ZEVs | \$ 200,140.00 | No |
| ML18165 | City of Baldwin Park | 2/1/2019 | 1/30/2024 | | \$ 49,030.00 | \$ - | Expand CNG Station | \$ 49,030.00 | No |
| ML18172 | City of Huntington Park | 3/1/2019 | 2/28/2025 | | \$ 65,450.00 | \$ - | Purchase One Heavy-Duty ZEV | \$ 65,450.00 | No |
| ML18174 | City of Bell | 11/22/2019 | 7/21/2026 | | \$ 25,000.00 | \$ - | Purchase One Heavy-Duty Near-Zero | \$ 25,000.00 | No |
| ML18177 | City of San Bernardino | 6/7/2019 | 12/6/2026 | 12/6/2028 | \$ 279,088.00 | \$ - | Purchase Medium- and Heavy-Duty Ev | \$ 279,088.00 | No |
| MS18009 | Penske Truck Leasing Co., L.P. | 8/8/2018 | 12/7/2020 | | \$ 82,500.00 | \$ - | Modify Maintenance Facility & Train Te | \$ 82,500.00 | No |
| MS18013 | California Energy Commission | | | | \$ 3,000,000.00 | \$ - | Advise MSRC and Administer Hydroge | \$ 3,000,000.00 | No |
| MS18017 | City of Banning | | | | \$ 225,000.00 | \$ - | Expansion of Existing CNG Infrastructu | \$ 225,000.00 | No |
| MS18018 | City of Norwalk | 6/8/2018 | 9/7/2019 | | \$ 75,000.00 | \$ - | Vehicle Maintenance Facility Modificati | \$ 75,000.00 | No |
| MS18107 | Huntington Beach Union High School District | | | | \$ 225,000.00 | \$ - | Expansion of Existing Infrastructure | \$ 225,000.00 | No |



AB2766 Contract Status Report
4/24/2025 - 5/28/2025

| Contract # | Contractor | Start Date | Original End Date | Amended End Date | Contract Value | Remitted | Project Description | Award Balance | Billing Complete? |
|-------------------------|---------------------------------------|------------|-------------------|------------------|-----------------|---------------|---|-----------------|-------------------|
| MS18109 | City of South Gate | | | | \$ 175,000.00 | \$ - | Install New Limited-Access CNG Infrast | \$ 175,000.00 | No |
| MS18111 | Newport-Mesa Unified School District | | | | \$ 175,000.00 | \$ - | Expansion of Existing CNG Infrastructu | \$ 175,000.00 | No |
| MS18112 | Banning Unified School District | 11/29/2018 | 11/28/2024 | 11/28/2025 | \$ 275,000.00 | \$ - | Install New CNG Infrastructure | \$ 275,000.00 | No |
| MS18113 | City of Torrance | | | | \$ 100,000.00 | \$ - | Expansion of Existing CNG Infrastructu | \$ 100,000.00 | No |
| MS18114 | Los Angeles County Department of | 11/15/2019 | 11/14/2026 | | \$ 175,000.00 | \$ - | Install New Limited-Access CNG Infrast | \$ 175,000.00 | No |
| MS18116 | Los Angeles County Department of | 11/15/2019 | 11/14/2026 | | \$ 175,000.00 | \$ - | Install New Limited-Access CNG Infrast | \$ 175,000.00 | No |
| MS18119 | LBA Realty Company XI LP | | | | \$ 100,000.00 | \$ - | Install New Limited-Access CNG Infrast | \$ 100,000.00 | No |
| MS18121 | City of Montebello | | | | \$ 70,408.00 | \$ - | Expansion of Existing CNG Infrastructu | \$ 70,408.00 | No |
| MS18175 | Regents of the University of Californ | 6/7/2019 | 8/6/2025 | 8/6/2026 | \$ 1,000,000.00 | \$ - | Expansion of Existing Hydrogen Stator | \$ 1,000,000.00 | No |
| MS18183 | Nikola-TA HRS 1, LLC | 9/28/2022 | 1/27/2030 | | \$ 1,660,000.00 | \$ - | Install Publicly Accessible Hydrogen Fu | \$ 1,660,000.00 | No |
| MS18184 | Clean Energy | | | | \$ 1,000,000.00 | \$ - | Install Publicly Accessible Hydrogen Fu | \$ 1,000,000.00 | No |
| Total = 29 | | | | | | | | | |
| <i>Closed Contracts</i> | | | | | | | | | |
| ML18019 | City of Hidden Hills | 5/3/2018 | 5/2/2022 | 5/2/2023 | \$ 49,999.00 | \$ 49,999.00 | Purchase Two Light-Duty ZEVs and EV | \$ - | Yes |
| ML18021 | City of Signal Hill | 4/6/2018 | 1/5/2022 | | \$ 49,661.00 | \$ 46,079.31 | Install EV Charging Stations | \$ 3,581.69 | Yes |
| ML18022 | City of Desert Hot Springs | 5/3/2018 | 1/2/2020 | 1/2/2021 | \$ 50,000.00 | \$ 50,000.00 | Traffic Signal and Synchronization Proj | \$ - | Yes |
| ML18028 | City of Artesia | 6/28/2018 | 3/27/2025 | | \$ 50,000.00 | \$ 50,000.00 | Install EVSE | \$ - | Yes |
| ML18030 | City of Grand Terrace | 6/28/2018 | 3/27/2022 | 3/27/2025 | \$ 45,000.00 | \$ 45,000.00 | Install EVSE | \$ - | Yes |
| ML18032 | City of Arcadia | 2/1/2019 | 4/30/2025 | | \$ 24,650.00 | \$ 24,650.00 | Purchase 1 Heavy-Duty Near-ZEV | \$ - | Yes |
| ML18033 | City of Duarte | 8/8/2018 | 2/7/2025 | | \$ 50,000.00 | \$ 50,000.00 | Purchase 1-HD ZEV | \$ - | Yes |
| ML18034 | City of Calabasas | 6/8/2018 | 3/7/2022 | 3/7/2023 | \$ 50,000.00 | \$ 50,000.00 | Install EVSE | \$ - | Yes |
| ML18035 | City of Westlake Village | 8/8/2018 | 11/7/2022 | | \$ 50,000.00 | \$ 50,000.00 | Install EVSE | \$ - | Yes |
| ML18039 | City of Redlands | 6/28/2018 | 7/27/2024 | 1/27/2025 | \$ 63,191.00 | \$ 63,190.33 | Purchase 1 Medium/Heavy-Duty ZEV a | \$ 0.67 | Yes |
| ML18040 | City of Agoura Hills | 7/13/2018 | 6/12/2022 | | \$ 17,914.00 | \$ 17,914.00 | Install EV Charging Infrastructure | \$ - | Yes |
| ML18041 | City of West Hollywood | 8/8/2018 | 12/7/2023 | 6/7/2024 | \$ 50,000.00 | \$ 50,000.00 | Install EV Charging Infrastructure | \$ - | Yes |
| ML18042 | City of San Fernando | 6/28/2018 | 2/27/2024 | | \$ 10,000.00 | \$ 10,000.00 | Purchase 1 Light-Duty ZEV | \$ - | Yes |
| ML18043 | City of Yorba Linda | 9/7/2018 | 12/6/2023 | 12/6/2024 | \$ 87,990.00 | \$ 87,990.00 | Install EV Charging Infrastructure | \$ - | Yes |
| ML18048 | City of Lynwood | 6/28/2018 | 10/27/2024 | | \$ 93,500.00 | \$ 44,505.53 | Purchase Up to 3 Medium-Duty Zero-E | \$ 48,994.47 | Yes |
| ML18049 | City of Downey | 7/6/2018 | 5/5/2023 | | \$ 148,260.00 | \$ 148,116.32 | Install EV Charging Stations | \$ 143.68 | Yes |
| ML18052 | City of Garden Grove | 8/8/2018 | 10/7/2022 | | \$ 53,593.00 | \$ 46,164.28 | Purchase 4 L.D. ZEVs and Infrastructu | \$ 7,428.72 | Yes |
| ML18054 | City of La Habra Heights | 8/8/2018 | 4/7/2022 | | \$ 9,200.00 | \$ 9,200.00 | Purchase 1 L.D. ZEV | \$ - | Yes |
| ML18056 | City of Chino | 3/29/2019 | 9/28/2023 | | \$ 103,868.00 | \$ 103,868.00 | Install EV Charging Infrastructure | \$ - | Yes |
| ML18061 | City of Moreno Valley | 5/9/2019 | 3/8/2025 | | \$ 25,000.00 | \$ 25,000.00 | Purchase 1 Heavy-Duty Near-ZEV | \$ - | Yes |
| ML18062 | City of Beaumont | 8/8/2018 | 9/7/2024 | | \$ 25,000.00 | \$ 25,000.00 | Purchase 1 Heavy-Duty Near-ZEV | \$ - | Yes |
| ML18070 | City of Lomita | 11/29/2018 | 6/28/2022 | | \$ 6,250.00 | \$ 6,250.00 | Purchase 1 Light-Duty ZEV | \$ - | Yes |
| ML18071 | City of Chino Hills | 9/7/2018 | 10/6/2022 | | \$ 20,000.00 | \$ 20,000.00 | Purchase 2 Light-Duty ZEVs | \$ - | Yes |
| ML18076 | City of Culver City Transportation D | 10/5/2018 | 10/4/2023 | | \$ 1,130.00 | \$ 1,130.00 | Purchase Light-Duty ZEV | \$ - | Yes |
| ML18077 | City of Orange | 11/2/2018 | 10/1/2022 | | \$ 59,776.00 | \$ 59,776.00 | Four Light-Duty ZEV and EV Charging | \$ - | Yes |
| ML18079 | City of Pasadena | 12/7/2018 | 11/6/2023 | | \$ 183,670.00 | \$ 183,670.00 | EV Charging Infrastructure | \$ - | Yes |
| ML18086 | City of Los Angeles Bureau of Stree | 2/8/2019 | 4/7/2023 | | \$ 300,000.00 | \$ 300,000.00 | Install Sixty EV Charging Stations | \$ - | Yes |
| ML18087 | City of Murrieta | 3/29/2019 | 3/28/2025 | | \$ 143,520.00 | \$ 143,520.00 | Install Four EV Charging Stations | \$ - | Yes |
| ML18088 | City of Big Bear Lake | 11/29/2018 | 8/28/2020 | 8/28/2021 | \$ 50,000.00 | \$ 50,000.00 | Install Bicycle Trail | \$ - | Yes |
| ML18090 | City of Santa Clarita | 5/9/2019 | 2/8/2023 | 2/8/2024 | \$ 122,000.00 | \$ 118,978.52 | Install Nine EV Charging Stations | \$ 3,021.48 | Yes |



AB2766 Contract Status Report
4/24/2025 - 5/28/2025

| Contract # | Contractor | Start Date | Original End Date | Amended End Date | Contract Value | Remitted | Project Description | Award Balance | Billing Complete? |
|------------|---------------------------------------|------------|-------------------|------------------|-----------------|-----------------|---|---------------|-------------------|
| ML18095 | City of Gardena | 11/9/2018 | 12/8/2024 | | \$ 25,000.00 | \$ 25,000.00 | Purchase Heavy-Duty Near-ZEV | \$ - | Yes |
| ML18096 | City of Highland | 12/13/2019 | 8/12/2024 | | \$ 10,000.00 | \$ 9,918.84 | Purchase Light-Duty Zero Emission Ve | \$ 81.16 | Yes |
| ML18097 | City of Temple City | 11/29/2018 | 7/28/2022 | | \$ 16,000.00 | \$ 12,000.00 | Purchase Two Light-Duty ZEVs | \$ 4,000.00 | Yes |
| ML18098 | City of Redondo Beach | 2/1/2019 | 3/31/2023 | 3/31/2025 | \$ 89,400.00 | \$ 89,400.00 | Install Six EV Charging Stations | \$ - | Yes |
| ML18099 | City of Laguna Hills | 3/1/2019 | 5/31/2023 | 9/30/2024 | \$ 32,250.00 | \$ 32,250.00 | Install EV Charging Stations | \$ - | Yes |
| ML18101 | City of Burbank | 2/1/2019 | 4/30/2024 | 10/30/2024 | \$ 137,310.00 | \$ 137,310.00 | Install Twenty EV Charging Stations | \$ - | Yes |
| ML18126 | City of Lomita | 12/7/2018 | 1/6/2020 | | \$ 26,500.00 | \$ 13,279.56 | Install bicycle racks and lanes | \$ 13,220.44 | Yes |
| ML18127 | City of La Puente | 2/1/2019 | 2/28/2023 | | \$ 10,000.00 | \$ 7,113.70 | Purchase Light-Duty Zero Emission Ve | \$ 2,886.30 | Yes |
| ML18128 | City of Aliso Viejo | 8/30/2019 | 11/29/2023 | | \$ 65,460.00 | \$ 65,389.56 | Purchase Two Light-Duty ZEVs and Ins | \$ 70.44 | Yes |
| ML18130 | City of Lake Forest | 3/1/2019 | 9/30/2022 | | \$ 106,480.00 | \$ 106,480.00 | Install Twenty-One EVSEs | \$ - | Yes |
| ML18131 | City of Los Angeles, Police Departm | 5/3/2019 | 12/2/2022 | | \$ 19,294.00 | \$ 19,294.00 | Purchase Three Light-Duty ZEVs | \$ - | Yes |
| ML18136 | City of Orange | 4/12/2019 | 8/11/2024 | | \$ 40,000.00 | \$ 40,000.00 | Purchase Four Light-Duty Zero Emissio | \$ - | Yes |
| ML18138 | City of La Canada Flintridge | 2/8/2019 | 5/7/2023 | | \$ 32,589.00 | \$ 32,588.07 | Install Four EVSEs and Install Bicycle f | \$ 0.93 | Yes |
| ML18139 | City of Calimesa | 8/30/2019 | 7/29/2020 | 11/29/2021 | \$ 50,000.00 | \$ 50,000.00 | Install Bicycle Lane | \$ - | Yes |
| ML18142 | City of La Quinta | 4/24/2019 | 2/23/2023 | 8/23/2023 | \$ 51,780.00 | \$ 51,780.00 | Install Two EV Charging Stations | \$ - | Yes |
| ML18148 | City of San Dimas | 1/21/2022 | 5/20/2023 | 11/20/2024 | \$ 50,000.00 | \$ 50,000.00 | Implement Bicycle Detection Measures | \$ - | Yes |
| ML18154 | City of Hemet | 11/22/2019 | 9/21/2023 | 3/21/2024 | \$ 30,000.00 | \$ 30,000.00 | Purchase Two Light-Duty ZEVs and EV | \$ - | Yes |
| ML18155 | City of Claremont | 7/31/2019 | 9/30/2023 | | \$ 35,609.00 | \$ 35,608.86 | Install EV Charging Infrastructure | \$ 0.14 | Yes |
| ML18156 | City of Covina | 2/1/2019 | 3/31/2023 | 12/31/2023 | \$ 63,800.00 | \$ 62,713.00 | Purchase Four Light-Duty ZEVs and EV | \$ 1,087.00 | Yes |
| ML18160 | City of Irwindale | 3/29/2019 | 12/28/2022 | | \$ 14,263.00 | \$ 14,263.00 | Purchase Two Light-Duty ZEVs | \$ - | Yes |
| ML18169 | City of Alhambra | 6/14/2019 | 8/13/2024 | | \$ 111,980.00 | \$ 111,980.00 | Install EV Charging Infrastructure | \$ - | Yes |
| ML18171 | City of El Monte | 3/1/2019 | 4/30/2025 | | \$ 68,079.00 | \$ 68,077.81 | Purchase One Heavy-Duty ZEVs and E | \$ 1.19 | Yes |
| ML18173 | City of Manhattan Beach | 3/29/2019 | 2/28/2023 | | \$ 49,000.00 | \$ 49,000.00 | Purchase Two Light-Duty ZEVs and EV | \$ - | Yes |
| ML18176 | City of Coachella | 3/1/2019 | 11/30/2024 | | \$ 58,020.00 | \$ 58,020.00 | Install EV Charging Stations | \$ - | Yes |
| ML18179 | City of Rancho Mirage | 8/20/2021 | 2/19/2022 | | \$ 50,000.00 | \$ 50,000.00 | Traffic Signal Synchronization | \$ - | Yes |
| ML18186 | City of Paramount | 8/1/2024 | 1/31/2025 | | \$ 42,686.00 | \$ 42,686.00 | Install EV Charging Infrastructure | \$ - | Yes |
| MS18001 | Los Angeles County MTA | 6/29/2017 | 4/30/2018 | | \$ 807,945.00 | \$ 652,737.07 | Provide Clean Fuel Transit Service to L | \$ 155,207.93 | Yes |
| MS18002 | Southern California Association of C | 6/9/2017 | 11/30/2018 | 12/30/2021 | \$ 2,500,000.00 | \$ 2,276,272.46 | Regional Active Transportation Partner | \$ 223,727.54 | Yes |
| MS18003 | Geographics | 2/21/2017 | 2/20/2021 | 6/20/2021 | \$ 72,453.00 | \$ 65,521.32 | Design, Host and Maintain MSRC Web | \$ 6,931.68 | Yes |
| MS18004 | Orange County Transportation Auth | 8/3/2017 | 4/30/2019 | | \$ 503,272.00 | \$ 456,145.29 | Provide Special Rail Service to Angel S | \$ 47,126.71 | Yes |
| MS18005 | Orange County Transportation Auth | 1/5/2018 | 4/30/2019 | | \$ 834,222.00 | \$ 834,222.00 | Clean Fuel Bus Service to OC Fair | \$ - | Yes |
| MS18006 | Anaheim Transportation Network | 10/6/2017 | 2/28/2020 | | \$ 219,564.00 | \$ 9,488.22 | Implement Anaheim Circulator Service | \$ 210,075.78 | Yes |
| MS18008 | Foothill Transit | 1/12/2018 | 3/31/2019 | | \$ 100,000.00 | \$ 99,406.61 | Special Transit Service to LA County F | \$ 593.39 | Yes |
| MS18010 | Southern California Regional Rail A | 12/28/2017 | 7/31/2019 | | \$ 351,186.00 | \$ 275,490.61 | Implement Special Metrolink Service to | \$ 75,695.39 | Yes |
| MS18011 | Southern California Regional Rail A | 2/9/2018 | 6/30/2018 | | \$ 239,565.00 | \$ 221,725.12 | Special Train Service to Festival of Ligh | \$ 17,839.88 | Yes |
| MS18012 | City of Hermosa Beach | 2/2/2018 | 2/1/2024 | | \$ 36,000.00 | \$ 36,000.00 | Construct New Limited-Access CNG S | \$ - | Yes |
| MS18014 | Regents of the University of Californ | 10/5/2018 | 12/4/2019 | 3/4/2020 | \$ 254,795.00 | \$ 251,455.59 | Planning for EV Charging Infrastructure | \$ 3,339.41 | Yes |
| MS18015 | Southern California Association of C | 7/13/2018 | 2/28/2021 | 11/30/2023 | \$ 2,000,000.00 | \$ 1,585,466.77 | Southern California Future Communitie | \$ 414,533.23 | Yes |
| MS18016 | Southern California Regional Rail A | 1/10/2019 | 3/31/2019 | | \$ 87,764.00 | \$ 73,140.89 | Special Train Service to Auto Club Spe | \$ 14,623.11 | Yes |
| MS18023 | Riverside County Transportation Cd | 6/28/2018 | 6/27/2021 | 3/31/2023 | \$ 500,000.00 | \$ 500,000.00 | Weekend Freeway Service Patrols | \$ - | Yes |
| MS18024 | Riverside County Transportation Cd | 6/28/2018 | 8/27/2021 | 8/31/2024 | \$ 1,500,000.00 | \$ 1,147,960.00 | Vanpool Incentive Program | \$ 352,040.00 | Yes |
| MS18025 | Los Angeles County MTA | 11/29/2018 | 5/31/2019 | | \$ 1,324,560.00 | \$ 961,246.86 | Special Bus and Train Service to Dodg | \$ 363,313.14 | Yes |
| MS18065 | San Bernardino County Transporta | 3/29/2019 | 8/28/2023 | 3/28/2024 | \$ 2,000,000.00 | \$ 2,000,000.00 | Implement Metrolink Line Fare Discour | \$ - | Yes |



AB2766 Contract Status Report
4/24/2025 - 5/28/2025

| Contract # | Contractor | Start Date | Original End Date | Amended End Date | Contract Value | Remitted | Project Description | Award Balance | Billing Complete? |
|------------|-------------------------------------|------------|-------------------|------------------|-----------------|-----------------|--|---------------|-------------------|
| MS18102 | Orange County Transportation Auth | 10/4/2019 | 5/31/2020 | | \$ 1,146,000.00 | \$ 1,146,000.00 | Implement OC Flex Micro-Transit Pilot | \$ - | Yes |
| MS18103 | Orange County Transportation Auth | 2/8/2019 | 9/7/2020 | | \$ 642,000.00 | \$ 613,303.83 | Install Hydrogen Detection System | \$ 28,696.17 | Yes |
| MS18104 | Orange County Transportation Auth | 2/21/2020 | 3/31/2021 | 3/31/2022 | \$ 212,000.00 | \$ 165,235.92 | Implement College Pass Transit Fare | \$ 46,764.08 | Yes |
| MS18105 | Southern California Regional Rail A | 1/10/2019 | 6/30/2019 | | \$ 252,696.00 | \$ 186,830.04 | Special Train Service to the Festival of | \$ 65,865.96 | Yes |
| MS18110 | Mountain View Unified School Distr | 2/1/2019 | 3/31/2025 | | \$ 61,748.00 | \$ 61,747.29 | Install New Limited-Access CNG Infrac | \$ 0.71 | Yes |
| MS18123 | City Rent A Bin DBA Serv-Wel Disp | 12/14/2018 | 2/13/2025 | | \$ 200,000.00 | \$ 200,000.00 | Install New Limited-Access CNG Infrac | \$ - | Yes |
| MS18180 | Omnitrans | 8/4/2022 | 8/3/2023 | | \$ 83,000.00 | \$ 75,000.00 | Modify Vehicle Maintenance Facility an | \$ 8,000.00 | Yes |

Total = 80

Closed/Incomplete Contracts

| | | | | | | | | | |
|---------|-----------------------|------------|------------|------------|--------------|------|--|--------------|----|
| ML18083 | City of San Fernando | 11/2/2018 | 11/1/2022 | | \$ 20,000.00 | \$ - | Implement Traffic Signal Synchronizati | \$ 20,000.00 | No |
| ML18093 | City of Monterey Park | 2/1/2019 | 2/28/2026 | 10/31/2028 | \$ 25,000.00 | \$ - | Purchase Heavy-Duty Near-ZEV | \$ 25,000.00 | No |
| ML18129 | City of Yucaipa | 12/14/2018 | 3/13/2023 | 9/13/2027 | \$ 63,097.00 | \$ - | Install Six EV Charging Stations | \$ 63,097.00 | No |
| ML18133 | City of Rancho Mirage | 12/7/2018 | 11/6/2020 | | \$ 50,000.00 | \$ - | Traffic Signal Synchronization | \$ 50,000.00 | No |
| ML18137 | City of Wildomar | 3/1/2019 | 5/31/2021 | 12/1/2022 | \$ 50,000.00 | \$ - | Install Bicycle Trail | \$ 50,000.00 | No |
| ML18167 | City of Beverly Hills | 3/29/2019 | 6/28/2025 | | \$ 50,000.00 | \$ - | Purchase Two Heavy-Duty Near-Zero | \$ 50,000.00 | No |
| ML18168 | City of Maywood | 3/29/2019 | 11/28/2022 | | \$ 7,059.00 | \$ - | Purchase EV Charging Infrastructure | \$ 7,059.00 | No |
| ML18185 | City of Wildomar | 10/19/2023 | 10/18/2024 | | \$ 25,000.00 | \$ - | Install Bicycle Trail | \$ 25,000.00 | No |
| MS18026 | Omnitrans | 10/5/2018 | 1/4/2020 | | \$ 83,000.00 | \$ - | Modify Vehicle Maintenance Facility an | \$ 83,000.00 | No |
| MS18118 | City of Beverly Hills | 3/29/2019 | 7/28/2025 | | \$ 85,272.00 | \$ - | Expansion of Existing CNG Infrac | \$ 85,272.00 | No |

Total = 10

Open/Complete Contracts

| | | | | | | | | | |
|---------|--------------------------------------|------------|------------|------------|---------------|---------------|--|--------------|-----|
| ML18020 | City of Colton | 5/3/2018 | 4/2/2024 | 4/2/2027 | \$ 67,881.00 | \$ 67,881.00 | Purchase One Medium-Duty and One | \$ - | Yes |
| ML18031 | City of Diamond Bar | 9/7/2018 | 11/6/2025 | 11/6/2027 | \$ 58,930.00 | \$ 58,930.00 | Install EVSE, Purchase up to 2-LD Veh | \$ - | Yes |
| ML18036 | City of Indian Wells | 8/8/2018 | 5/7/2023 | 5/7/2026 | \$ 50,000.00 | \$ 50,000.00 | Install EV Charging Stations | \$ - | Yes |
| ML18037 | City of Westminster | 6/28/2018 | 6/27/2024 | 12/27/2026 | \$ 120,900.00 | \$ 120,900.00 | Install EVSE, Purchase up to 3-LD ZEV | \$ - | Yes |
| ML18038 | City of Anaheim | 10/5/2018 | 5/4/2025 | 5/4/2026 | \$ 151,630.00 | \$ 147,883.27 | Purchase 5 Light-Duty ZEVs and Instal | \$ 3,746.73 | Yes |
| ML18045 | City of Culver City Transportation D | 6/28/2018 | 6/27/2025 | | \$ 51,000.00 | \$ 51,000.00 | Purchase Eight Near-Zero Vehicles | \$ - | Yes |
| ML18046 | City of Santa Ana - Public Works A | 11/9/2018 | 7/8/2026 | | \$ 359,591.00 | \$ 359,590.75 | Purchase 6 Light-Duty ZEVs, 9 Heavy- | \$ 0.25 | Yes |
| ML18047 | City of Whittier | 8/8/2018 | 4/7/2026 | 1/7/2029 | \$ 113,910.00 | \$ 113,910.00 | Purchase 5 Heavy-Duty Near-Zero Em | \$ - | Yes |
| ML18050 | City of Irvine | 9/7/2018 | 8/6/2028 | | \$ 302,035.00 | \$ 302,035.00 | Install EVSE | \$ - | Yes |
| ML18051 | City of Rancho Cucamonga | 3/1/2019 | 10/31/2025 | 4/30/2030 | \$ 91,500.00 | \$ 91,500.00 | Purchase 6 Light-Duty ZEVs, Install 3 l | \$ - | Yes |
| ML18059 | City of Glendale Water & Power | 2/1/2019 | 7/31/2026 | 1/31/2028 | \$ 260,500.00 | \$ 232,315.70 | Install Electric Vehicle Charging Infrac | \$ 28,184.30 | Yes |
| ML18063 | City of Riverside | 6/7/2019 | 1/6/2027 | 9/30/2029 | \$ 50,000.00 | \$ 50,000.00 | Expand Existing CNG Station | \$ - | Yes |
| ML18064 | City of Eastvale | 11/29/2018 | 4/28/2026 | 4/28/2029 | \$ 61,463.00 | \$ 61,462.40 | Purchase 2 Light-Duty, One Medium-D | \$ 0.60 | Yes |
| ML18072 | City of Anaheim | 12/18/2018 | 11/17/2026 | | \$ 239,560.00 | \$ 239,560.00 | Purchase 9 Light-Duty ZEVs & 2 Med/h | \$ - | Yes |
| ML18074 | City of Buena Park | 12/14/2018 | 6/13/2026 | | \$ 107,960.00 | \$ 107,960.00 | EV Charging Infrastructure | \$ - | Yes |
| ML18080 | City of Santa Monica | 1/10/2019 | 12/9/2023 | 9/9/2025 | \$ 44,289.00 | \$ 44,288.92 | Install EV Charging Stations | \$ 0.08 | Yes |
| ML18081 | City of Beaumont | 10/5/2018 | 10/4/2022 | 10/4/2025 | \$ 31,870.00 | \$ 31,870.00 | EV Charging Infrastructure | \$ - | Yes |
| ML18085 | City of Orange | 4/12/2019 | 10/11/2026 | | \$ 50,000.00 | \$ 50,000.00 | Purchase Two Heavy-Duty Near-Zero | \$ - | Yes |
| ML18089 | City of Glendora | 7/19/2019 | 4/18/2025 | 10/18/2028 | \$ 50,760.00 | \$ 50,760.00 | Purchase a Heavy-Duty ZEV | \$ - | Yes |
| ML18091 | City of Temecula | 1/19/2019 | 7/18/2023 | 3/18/2026 | \$ 111,575.00 | \$ 111,574.46 | Install EV Charging Stations | \$ 0.54 | No |
| ML18094 | City of Laguna Woods | 7/12/2019 | 12/11/2024 | 10/11/2026 | \$ 50,000.00 | \$ 50,000.00 | Install Two EV Charging Ports | \$ - | Yes |
| ML18100 | City of Brea | 10/29/2020 | 12/28/2024 | 12/31/2025 | \$ 56,500.00 | \$ 56,500.00 | Install Twenty-Four Level II EV Chargir | \$ - | Yes |



AB2766 Contract Status Report
4/24/2025 - 5/28/2025

| Contract # | Contractor | Start Date | Original End Date | Amended End Date | Contract Value | Remitted | Project Description | Award Balance | Billing Complete? |
|------------|--------------------------------------|------------|-------------------|------------------|-----------------|-----------------|---|---------------|-------------------|
| ML18132 | City of Montclair | 4/5/2019 | 9/4/2023 | 9/4/2026 | \$ 40,000.00 | \$ 40,000.00 | Install Eight EV Chargers | \$ - | Yes |
| ML18134 | City of Los Angeles Dept of Genera | 5/3/2019 | 5/2/2028 | 5/2/2029 | \$ 116,000.00 | \$ 116,000.00 | Purchase Two Medium-Duty ZEVs | \$ - | Yes |
| ML18141 | City of Rolling Hills Estates | 2/14/2020 | 1/13/2024 | 4/13/2026 | \$ 40,000.00 | \$ 40,000.00 | Purchase One Light-Duty ZEV and Inst | \$ - | Yes |
| ML18143 | City of La Habra | 10/18/2019 | 9/17/2025 | 9/17/2027 | \$ 80,700.00 | \$ 80,700.00 | Install Two EV Charging Stations | \$ - | Yes |
| ML18144 | City of Fontana Public Works | 10/4/2019 | 12/3/2023 | 12/31/2025 | \$ 269,090.00 | \$ 269,090.00 | Install Twelve EVSEs | \$ - | No |
| ML18146 | City of South Gate | 3/1/2019 | 11/30/2023 | 11/30/2026 | \$ 127,400.00 | \$ 127,400.00 | Purchase Five Light-Duty ZEVs and Ins | \$ - | Yes |
| ML18157 | City of Los Angeles Bureau of Stree | 6/21/2019 | 5/20/2027 | | \$ 85,000.00 | \$ 85,000.00 | Purchase One Medium-Duty ZEV | \$ - | Yes |
| ML18159 | City of Rialto | 12/13/2019 | 5/12/2024 | 9/19/2025 | \$ 135,980.00 | \$ 106,597.86 | Purchase Nine Light-Duty ZEVs and EV | \$ 29,382.14 | No |
| ML18161 | City of Indio | 5/3/2019 | 10/2/2025 | | \$ 25,000.00 | \$ 25,000.00 | Purchase 1 Light-Duty Zero Emission a | \$ - | Yes |
| ML18162 | City of Costa Mesa | 1/10/2020 | 7/9/2026 | | \$ 148,210.00 | \$ 148,210.00 | Purchase Three Light-Duty ZEVs and E | \$ - | Yes |
| ML18163 | City of San Clemente | 3/8/2019 | 12/7/2024 | 12/7/2025 | \$ 75,000.00 | \$ 70,533.75 | Purchase Three Light-Duty ZEVs and E | \$ 4,466.25 | Yes |
| ML18166 | City of Placentia | 2/18/2021 | 5/17/2027 | | \$ 25,000.00 | \$ 25,000.00 | Purchase One Heavy-Duty Near-Zero f | \$ - | Yes |
| ML18170 | City of Laguna Niguel | 1/10/2020 | 8/9/2028 | | \$ 75,100.00 | \$ 75,100.00 | Purchase One Light-Duty ZEV and EV | \$ - | No |
| MS18027 | City of Gardena | 11/2/2018 | 9/1/2026 | 10/1/2029 | \$ 350,000.00 | \$ 350,000.00 | Install New Limited Access CNG, Modif | \$ - | Yes |
| MS18066 | El Dorado National | 12/6/2019 | 2/5/2026 | | \$ 100,000.00 | \$ 100,000.00 | Install New Limited-Access CNG Statio | \$ - | Yes |
| MS18073 | Los Angeles County MTA | 1/10/2019 | 2/9/2026 | | \$ 2,000,000.00 | \$ 2,000,000.00 | Purchase 40 Zero-Emission Transit Bu | \$ - | Yes |
| MS18106 | R.F. Dickson Co., Inc. | 7/19/2019 | 1/18/2026 | | \$ 265,000.00 | \$ 250,470.90 | Expansion of Existing Infrastructure/Me | \$ 14,529.10 | Yes |
| MS18108 | Capistrano Unified School District | 2/1/2019 | 5/30/2025 | 9/30/2026 | \$ 111,750.00 | \$ 111,750.00 | Expansion of Existing Infrastructure | \$ - | Yes |
| MS18115 | City of Commerce | 6/7/2019 | 12/6/2025 | 7/6/2026 | \$ 275,000.00 | \$ 275,000.00 | Expansion of Existing L/CNG Infrastruc | \$ - | No |
| MS18117 | City of San Bernardino | 6/7/2019 | 11/6/2025 | | \$ 240,000.00 | \$ 240,000.00 | Expansion of Existing CNG Infrastructu | \$ - | Yes |
| MS18120 | City of Redondo Beach | 2/1/2019 | 9/30/2025 | | \$ 275,000.00 | \$ 275,000.00 | Install New Limited-Access CNG Infr | \$ - | Yes |
| MS18122 | Universal Waste Systems, Inc. | 2/1/2019 | 3/31/2025 | 7/31/2027 | \$ 195,000.00 | \$ 195,000.00 | Install New Limited Access CNG Infr | \$ - | Yes |
| MS18124 | County Sanitation Districts of Los A | 7/31/2019 | 2/28/2027 | | \$ 275,000.00 | \$ 275,000.00 | Install New Limited-Access CNG Infr | \$ - | Yes |
| MS18125 | U.S. Venture | 5/9/2019 | 8/8/2025 | | \$ 200,000.00 | \$ 200,000.00 | Install New Limited-Access CNG Infr | \$ - | Yes |

Total = 46

Terminated Contracts

| | | | | | | | | | |
|---------|---------------------------------|------------|------------|------------|-----------------|------|---|-----------------|----|
| ML18058 | City of Perris | 10/12/2018 | 11/11/2024 | 11/11/2028 | \$ 94,624.00 | \$ - | Purchase 1 Medium-Duty ZEV and EV | \$ 94,624.00 | No |
| ML18084 | City of South El Monte | 10/18/2019 | 9/17/2023 | 3/30/2028 | \$ 30,000.00 | \$ - | EV Charging Infrastructure | \$ 30,000.00 | No |
| ML18147 | City of Palm Springs | 1/10/2019 | 1/9/2024 | 7/9/2026 | \$ 60,000.00 | \$ - | Install Eighteen EV Charging Stations | \$ 60,000.00 | No |
| ML18178 | City of La Puente | 11/1/2019 | 11/30/2025 | 11/30/2028 | \$ 25,000.00 | \$ - | Purchase One Heavy-Duty Near-Zero f | \$ 25,000.00 | No |
| MS18029 | Irvine Ranch Water District | 8/8/2018 | 10/7/2024 | 1/7/2029 | \$ 185,000.00 | \$ - | Install New Limited Access CNG Statio | \$ 185,000.00 | No |
| MS18182 | Air Products and Chemicals Inc. | 3/8/2023 | 2/7/2031 | 8/7/2032 | \$ 1,000,000.00 | \$ - | Install Publicly Accessible Hydrogen Fu | \$ 1,000,000.00 | No |

Total = 6

FY 2018-2021 Contracts

Open Contracts

| | | | | | | | | | |
|---------|--------------------------------------|-----------|-----------|-----------|------------------|-----------------|--------------------------------------|------------------|----|
| MS21005 | Southern California Association of C | 5/5/2021 | 1/31/2024 | 1/31/2027 | \$ 16,751,000.00 | \$ 1,452,085.88 | Implement Last Mile Goods Movement | \$ 15,298,914.12 | No |
| MS21006 | Geographics | 4/1/2021 | 6/20/2023 | 9/20/2025 | \$ 21,421.00 | \$ 20,205.00 | Hosting & Maintenance of the MSRC W | \$ 1,216.00 | No |
| MS21009 | ITS Technologies & Logistics, LLC | 7/15/2022 | 7/14/2028 | 4/14/2030 | \$ 1,686,900.00 | \$ 337,380.00 | Deploy 12 Zero-Emission Yard Tractor | \$ 1,349,520.00 | No |
| MS21010 | MHX, LLC | 9/29/2021 | 1/28/2028 | 6/28/2030 | \$ 569,275.00 | \$ - | Deploy One Zero-Emission Overhead C | \$ 569,275.00 | No |
| MS21016 | Ryder Integrated Logistics, Inc. | 12/7/2022 | 4/6/2029 | | \$ 3,169,746.00 | \$ - | Procure Two Integrated Power Centers | \$ 3,169,746.00 | No |
| MS21023 | BNSF Railway Company | 4/22/2022 | 4/21/2028 | 4/21/2030 | \$ 1,313,100.00 | \$ - | Install EV Charging Infrastructure | \$ 1,313,100.00 | No |

Total = 6



AB2766 Contract Status Report
4/24/2025 - 5/28/2025

| Contract # | Contractor | Start Date | Original End Date | Amended End Date | Contract Value | Remitted | Project Description | Award Balance | Billing Complete? |
|-------------------------------------|--|------------|-------------------|------------------|-----------------|----------|---|-----------------|-------------------|
| <i>Declined/Cancelled Contracts</i> | | | | | | | | | |
| MS21008 | CMA CGM (America) LLC | | | | \$ 3,000,000.00 | \$ - | Deploy 2 Zero-Emission Rubber Tire G | \$ 3,000,000.00 | No |
| MS21011 | RDS Logistics Group | 1/21/2022 | 7/20/2028 | | \$ 808,500.00 | \$ - | Deploy 3 Zero-Emission Yard Tractors | \$ 808,500.00 | No |
| MS21012 | Amazon Logistics, Inc. | | | | \$ 4,157,710.00 | \$ - | Deploy up to 10 Zero-Emission and 10 | \$ 4,157,710.00 | No |
| MS21020 | Sea-Logix, LLC | | | | \$ 2,300,000.00 | \$ - | Deploy up to 23 Near-Zero Emssions T | \$ 2,300,000.00 | No |
| MS21021 | CMA CGM (America) LLC | | | | \$ 1,946,463.00 | \$ - | Deploy up to 13 Near Zero Emission Tr | \$ 1,946,463.00 | No |
| MS21022 | Orange County Transportation Authority | | | | \$ 289,054.00 | \$ - | Implement Special Transit Service to th | \$ 289,054.00 | No |

Total = 6

Closed Contracts

| | | | | | | | | | |
|---------|-----------------------------------|-----------|------------|------------|---------------|---------------|--|---------------|-----|
| MS21001 | Los Angeles County MTA | 8/30/2019 | 7/29/2020 | | \$ 613,752.87 | \$ 613,752.87 | Implement Special Transit Service to D | \$ - | Yes |
| MS21002 | Better World Group Advisors | 11/1/2019 | 12/31/2022 | 12/31/2024 | \$ 448,154.00 | \$ 246,331.16 | Programmatic Outreach Services | \$ 201,822.84 | Yes |
| MS21003 | Orange County Transportation Auth | 7/8/2020 | 5/31/2021 | | \$ 468,298.00 | \$ 241,150.48 | Provide Express Bus Service to the Or | \$ 227,147.52 | Yes |
| MS21004 | Los Angeles County MTA | 1/7/2021 | 5/31/2023 | | \$ 814,822.00 | \$ 326,899.00 | Clean Fuel Bus Service to Dodger Stad | \$ 487,923.00 | Yes |

Total = 4

Open/Complete Contracts

| | | | | | | | | | |
|---------|------------------------------------|-----------|-----------|------------|-----------------|-----------------|---------------------------------------|--------------|-----|
| MS21007 | Penske Truck Leasing Co., L.P. | 4/1/2022 | 3/31/2028 | | \$ 957,813.00 | \$ 957,812.40 | Deploy 5 Zero-Emission Yard Tractors | \$ 0.60 | Yes |
| MS21013 | 4 Gen Logistics | 3/27/2022 | 5/26/2028 | | \$ 7,000,000.00 | \$ 7,000,000.00 | Deploy 40 Zero Emission Trucks | \$ - | Yes |
| MS21014 | Green Fleet Systems, LLC | 8/31/2021 | 8/30/2027 | 8/30/2028 | \$ 300,000.00 | \$ 300,000.00 | Deploy up to 3 Near Zero Emission Tru | \$ - | Yes |
| MS21015 | Premium Transportation Services, I | 9/22/2021 | 5/21/2027 | 1/2/2028 | \$ 1,500,000.00 | \$ 1,483,065.00 | Deploy up to 15 Near-Zero Emissions | \$ 16,935.00 | No |
| MS21017 | MHX, LLC | 9/29/2021 | 9/28/2030 | | \$ 1,900,000.00 | \$ 1,900,000.00 | Deploy up to 10 Zero-Emission Trucks | \$ - | Yes |
| MS21018 | Pac Anchor Transportation, Inc. | 8/17/2021 | 8/16/2027 | 8/16/2028 | \$ 2,100,000.00 | \$ 2,100,000.00 | Deploy up to 21 Near Zero Emission Tr | \$ - | Yes |
| MS21019 | Volvo Financial Services | 3/31/2022 | 3/30/2030 | 12/30/2030 | \$ 3,930,270.00 | \$ 3,930,103.15 | Lease up to 14 Zero-Emission Trucks | \$ 166.85 | Yes |
| MS21025 | Costco Wholesale Corporation | 12/9/2022 | 12/8/2028 | | \$ 160,000.00 | \$ 160,000.00 | Install Five EV Charging Units | \$ - | Yes |

Total = 8

FY 2021-2024 Contracts

Open Contracts

| | | | | | | | | | |
|---------|---------------------------------|------------|------------|-----------|-----------------|--------------|---|-----------------|----|
| MS24001 | Los Angeles County MTA | 1/26/2023 | 5/31/2028 | | \$ 1,200,248.00 | \$ - | Provide Clean Fuel Bus Service to Dod | \$ 1,200,248.00 | No |
| MS24002 | South Pasadena Police Departmen | 1/16/2024 | 5/15/2030 | | \$ 499,789.00 | \$ - | Procure Zero-Emission Vehicles and In | \$ 499,789.00 | No |
| MS24003 | Omnitrans | 4/15/2024 | 10/30/2025 | 8/30/2026 | \$ 315,278.00 | \$ - | Bloomington Microtransit Service Expa | \$ 315,278.00 | No |
| MS24004 | City of Seal Beach | 12/21/2023 | 9/30/2025 | | \$ 162,891.00 | \$ - | Circuit Transit Shared Mobility | \$ 162,891.00 | No |
| MS24005 | City of Huntington Beach | 7/1/2024 | 9/1/2026 | | \$ 279,186.00 | \$ - | Circuit Transit Rideshare Program | \$ 279,186.00 | No |
| MS24006 | Anaheim Transportation Network | 10/12/2023 | 5/31/2025 | 8/31/2025 | \$ 322,000.00 | \$ - | Old Towne Orange Microtransit Service | \$ 322,000.00 | No |
| MS24007 | City of Gardena | 6/12/2024 | 8/31/2026 | | \$ 424,134.00 | \$ 76,132.30 | Gtrans Microtransit Service | \$ 348,001.70 | No |
| MS24008 | City of Long Beach | 3/19/2024 | 1/31/2026 | | \$ 410,734.00 | \$ - | Circuit Transit Mobility Transit Expansid | \$ 410,734.00 | No |

Total = 8

Pending Execution Contracts

| | | | | | | | | | |
|---------|---------------------------------|--|--|--|------------------|------|--|------------------|----|
| MS24010 | Penske Truck Leasing Co., L.P. | | | | \$ 17,980,000.00 | \$ - | Partner on Application to Install EV Ch | \$ 17,980,000.00 | No |
| MS24011 | Southern California Gas Company | | | | \$ 6,000,000.00 | \$ - | Partner on Application to Install Hydrog | \$ 6,000,000.00 | No |
| MS24012 | Pilot Travel Center, LLC | | | | \$ 3,000,000.00 | \$ - | Partner on Application to Install Hydrog | \$ 3,000,000.00 | No |
| MS24013 | Los Angeles Cleantech Incubator | | | | \$ 3,000,000.00 | \$ - | Implement Drayage Truck Recharging | \$ 3,000,000.00 | No |
| MS24999 | Prologis Mobility | | | | \$ 10,843,251.00 | \$ - | Implement EV Charging in various loca | \$ 10,843,251.00 | No |

Total = 5



AB2766 Contract Status Report
4/24/2025 - 5/28/2025

| Contract # | Contractor | Start Date | Original End Date | Amended End Date | Contract Value | Remitted | Project Description | Award Balance | Billing Complete? |
|------------|------------|------------|-------------------|------------------|----------------|----------|---------------------|---------------|-------------------|
|------------|------------|------------|-------------------|------------------|----------------|----------|---------------------|---------------|-------------------|

FY 2024-2027 Contracts

Open Contracts

| | | | | | | | | | |
|---------|-----------------------------|----------|------------|--|---------------|--------------|--------------------------------|---------------|----|
| MS27001 | Better World Group Advisors | 1/1/2025 | 12/31/2027 | | \$ 300,000.00 | \$ 26,155.25 | Programmatic Outreach Services | \$ 273,844.75 | No |
|---------|-----------------------------|----------|------------|--|---------------|--------------|--------------------------------|---------------|----|

Total = 1

Pending Execution Contracts

| | | | | | | | | | |
|---------|------------------------------|--|--|--|-----------------|--|---------------------------------------|-----------------|----|
| MS27002 | California Energy Commission | | | | \$ 6,000,000.00 | | West Coast Truck Chrg & Fuel Corrido | \$ 6,000,000.00 | No |
| MS27003 | Exemplifi, LLC | | | | \$ 20,200.00 | | Host and Maintain MSRC Website | \$ 20,200.00 | No |
| MS27998 | Enevate Corp. | | | | \$ 250,000.00 | | Develop, Dmns Fst Chrg Btty Pck for M | \$ 250,000.00 | No |
| MS27997 | Evoelectric, Inc. | | | | \$ 250,000.00 | | Intg & Dmns Btty Pck & Fst Chrg w/Ms | \$ 250,000.00 | No |
| MS27999 | Voltu Motor, Inc. | | | | \$ 300,000.00 | | Develop, Dmns & Deploy MD ZE Wk T | \$ 300,000.00 | No |

Total = 5



AB2766 Discretionary Fund Program Invoices

4/24/2025 to 5/28/2025

| Contract Admin. | MSRC Chair | MSRC Liaison | Finance | Contract # | Contractor | Invoice # | Amount |
|-------------------------------|------------|--------------|-----------|------------|-----------------------------------|---------------|--------------|
| <i>2014-2016 Work Program</i> | | | | | | | |
| 4/30/2025 | 5/3/2025 | 5/7/2025 | 5/14/2025 | ML16075 | City of San Fernando | 2025-042825 | \$284,150.12 |
| Total: \$284,150.12 | | | | | | | |
| <i>2016-2018 Work Program</i> | | | | | | | |
| 5/15/2025 | 5/15/2025 | 5/16/2025 | 5/19/2025 | ML18051 | City of Rancho Cucamonga | CINV-000436 | \$9,000.00 |
| 4/24/2025 | 5/3/2025 | 5/7/2025 | 5/14/2025 | ML18078 | County of Riverside | 8 | \$25,000.00 |
| Total: \$34,000.00 | | | | | | | |
| <i>2018-2021 Work Program</i> | | | | | | | |
| 5/20/2025 | | | | MS21006 | Geographics | 25-24143 | \$279.75 |
| 5/13/2025 | 5/15/2025 | 5/16/2025 | 5/19/2025 | MS21009 | ITS Technologies & Logistics, LLC | 2 | \$168,690.00 |
| 5/1/2025 | 5/3/2025 | N/A | 5/7/2025 | MS21006 | Geographics | 25-24129 | \$324.00 |
| 5/1/2025 | 5/3/2025 | N/A | 5/7/2025 | MS21006 | Geographics | 25-24120 | \$373.00 |
| Total: \$169,666.75 | | | | | | | |
| <i>2021-2024 Work Program</i> | | | | | | | |
| 5/13/2025 | 5/15/2025 | 5/16/2025 | 5/21/2025 | MS24007 | City of Gardena | 24-MS24007_01 | \$76,132.30 |
| Total: \$76,132.30 | | | | | | | |

Total This Period: \$563,949.17

[↑ Back to Agenda](#)

BOARD MEETING DATE: August 1, 2025

AGENDA NO. 22

REPORT: California Air Resources Board Monthly Meeting

SYNOPSIS: The California Air Resources Board held Board meetings on June 26, 2025 and July 24, 2025. The following is a summary of the meetings.

RECOMMENDED ACTION:
Receive and file.

Patricia Lock Dawson, Member
South Coast AQMD Governing Board

ft

The June 26, 2025 and July 24, 2025 Board meetings of the California Air Resources Board (CARB or Board) was held in Sacramento, California at the California Environmental Protection Agency Headquarters Building. The key items presented are summarized below.

June 26, 2025

CONSENT ITEM

25-4-1: Public Hearing to Consider the Proposed Repeal of the In-Use Locomotive Regulation

The Board approved the repeal of the In-Use Locomotive Regulation (Regulation). In April 2023, the Board adopted the Regulation, and staff submitted an authorization request to the United States Environmental Protection Agency (U.S. EPA) in November 2023. Due to inaction from U.S. EPA on the authorization request, CARB withdrew the request in January 2025. Without authorization, CARB will not have the authority to enforce the Regulation. To avoid confusion and uncertainty for California locomotive operators, the Board approved the repeal of the Regulation to remove it from the California Code of Regulations.

DISCUSSION ITEM

25-4-2: Public Meeting to Consider CARB Staff Recommendations for Appointment of Members to the Community Air Protection (AB 617) Consultation Group

The Board appointed members to the Community Air Protection (Assembly Bill (AB) 617 (C. Garcia, Chapter 136, Statutes of 2017)) Consultation Group. AB 617 requires CARB to prepare, and update every five years, a statewide strategy to reduce emissions of toxic air contaminants and criteria air pollutants in communities affected by a high cumulative exposure burden. AB 617 also requires CARB to develop and update this strategy in consultation with “the Scientific Review Panel on Toxic Air Contaminants, the districts, the Office of Environmental Health Hazard Assessment, environmental justice organizations, affected industry, and other interested stakeholders.” In January 2018, CARB first convened a 25-member Consultation Group which was dissolved in March 2024 due to attrition. Since then, CARB staff have worked to fulfill its commitment in Blueprint 2.0 “to reinvigorate the Consultation Group” and expand representation to include local government and consistently nominated communities. CARB staff conducted a robust recruitment and outreach plan to ensure a balanced representation across all stakeholder categories and geographic diversity in the expanded Consultation Group. The appointed 26 nominees and nine alternates to the Consultation Group will serve a four-year term as set out in the Board resolution and the draft Consultation Group Charter.

July 24, 2025

DISCUSSION ITEMS

25-5-1: Public Hearing to Consider the Proposed Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure

The Board approved the proposed amendments to the Advanced Clean Trucks regulation and the Zero-Emission Powertrain Certification test procedure. The Board adopted the Advanced Clean Trucks regulation in 2020 as part of a comprehensive strategy to reduce emissions from medium- and heavy-duty vehicles in California. The Advanced Clean Trucks regulation amendments meet commitments made under the Clean Truck Partnership agreement and provide additional flexibilities to the regulated manufacturers. The amendments to the Zero-Emission Powertrain Certification regulation modify the communication protocols with respect to the zero-emission vehicle connector criteria.

25-5-2: Public Meeting to Hear an Update on Community Air Protection Program Annual Progress

The Board heard an annual update on the implementation progress of the Community Air Protection Program, implementation Assembly Bill 617. This law requires air districts to prepare an annual implementation report for each community emissions reduction program. CARB staff has reviewed these reports and synthesized the findings in the accompanying *Community Air Protection Program Annual Progress Report*. The update described progress of 15 communities implementing community emission reduction programs for more than six months as of December 2024. The report also highlights progress in supporting consistently nominated communities through the three new pathways identified in Blueprint 2.0 (the program guidance document): the use of Community Air Grants to develop Local Community Emissions Reduction Plans, community-focused enforcement, and increased flexibility in the use of Community Air Protection Incentives.

South Coast AQMD Staff Comments/Testimony: Staff highlighted how the Community Engagement & Air Programs (CEAP) Division supports Assembly Bill 617, discussed initiatives like the Critical Community Conversations for Purposeful Outreach (C3PO), Think Tanks, and book clubs that build community capacity, and shared outcomes from community engagement and outreach efforts with Consistently Nominated Communities.

Attachments

CARB June 26 and July 24, 2025 Meeting Agendas

Public Meeting Agenda

Thursday, June 26, 2025 @ 4:00 p.m.

Zoom Webinar: [Register](#)

Phone Number: +1 (669) 444-9171

Webinar ID: 959 6056 9610

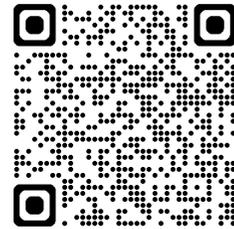
Conference Code: 343268

California Environmental Protection Agency

1001 I Street, Sacramento, California 95814

Byron Sher Auditorium, 2nd Floor

[webcast](#) (Livestream/Watch Only)



ww2.arb.ca.gov/ma062625

The June 26, 2025, meeting of the California Air Resources Board (CARB or Board) will be held at 1001 I Street in Sacramento, with remote participation also available. This facility is accessible to persons with disabilities and by public transit. For transit information, call (916) 321-BUSS (2877) or visit <http://sacrt.com/>.

To only watch the Board Meeting and not provide verbal comments, please view the [webcast](#). If you do not wish to provide oral comments, we strongly recommend watching the webcast as this will free up space on the webinar for those who are providing oral comments. Please do not view the webcast and then switch over to the webinar to comment as the webcast will have a time delay; instead, register to participate via the Zoom webinar.

Public Comment Guidelines and Information

- [In-Person Public Testimony](#)
- [Remote Public Participation](#)

The Board will set a two-minute time limit on oral comments; however, the amount of time could change at the Chair's discretion. In-person speakers signed up to comment will be called upon first, followed by public Zoom and phone participants wishing to comment. The Chair may close speaker sign-ups 30 minutes after the public comment portion of an item has begun.

Please note that under the California Public Records Act (Gov. Code, § 7920.000 et seq.), your written and oral comments, attachments, and associated contact information (e.g., your address, phone, email, etc.) become part of the public record and can be released to the public upon request.

Spanish interpretation will be available for the June 26 Board Meeting

- [Agenda de la Reunión Pública](#)

- [Spanish Webcast](#)

Thursday, June 26, 2025 @ 4:00 p.m.

The following agenda items may be heard in a different order at the Board Meeting.

Hard copies of the Public Agenda and Proposed Resolutions (when applicable) will be provided at the meeting; copies of all other documents linked below will only be available upon request.

Consent Items:

25-4-1: Public Hearing to Consider the Proposed Repeal of the In-Use Locomotive Regulation

The Board will consider the repeal of the In-Use Locomotive Regulation.

- [Formal Rulemaking Page](#)
 - [Public Hearing Notice](#)
- [Item Summary](#)
- [Proposed Resolution](#)
- [Submit Written Comments](#)
- [View Public Comments](#)

Discussion Items:

25-4-2: Public Meeting to Consider CARB Staff Recommendations for Appointment of Members to the Community Air Protection (AB 617) Consultation Group

The Board will consider staff recommendations for the Community Air Protection (AB 617) Consultation Group member appointments. The Consultation Group will advise CARB on the implementation of Blueprint 2.0 and is subject to the Bagley-Keene Open Meeting Act.

- [More Information](#)
- [Public Meeting Notice](#)
- [Item Summary](#)
- [Draft Consultation Group Charter](#)
- [Meeting Presentation](#)
- [List of Applicants Recommended for Membership](#)
- [Proposed Resolution](#)
- [Submit Written Comments](#)
- [View Public Comments](#)

Closed Session

The Board may hold a closed session as authorized by Government Code section 11126(e) to confer with, and receive advice from, its legal counsel regarding the following pending litigation, potential litigation on additional challenges to federal decisions regarding waivers

and authorizations, and other matters as authorized by Government Code section 11126(e)(2)(B) or (C):

American Free Enterprise Chamber of Commerce v. Engine Manufacturers Association, et al. (United States District Court, Northern District of Illinois, Western Division, Case No. 3:24-cv-50504)

American Free Enterprise Chamber of Commerce, et al. v. Steven S. Cliff et al. (United States District Court, Eastern District of California, Sacramento Division, Case No. 2:24 cv 00988 KJM-JDP)

American Free Enterprise Chamber of Commerce v. U.S. Environmental Protection Agency (United States Court of Appeals, Ninth Circuit, Case No. 25-89)

American Free Enterprise Chamber of Commerce v. U.S. Environmental Protection Agency (United States Court of Appeals, Ninth Circuit, Case No. 25-106)

American Fuel & Petrochemical Manufacturers and Energy Marketers of America v. U.S. Environmental Protection Agency (United States Court of Appeals, Ninth Circuit, Case No. 25-1481); *American Fuel & Petrochemical Manufacturers and Energy Marketers of America v. U.S. Environmental Protection Agency* (United States Court of Appeals, District of Columbia Circuit Court, Case No. 25-1084)

American Fuel & Petrochemical Manufacturers and the American Waterways Operators v. U.S. Environmental Protection Agency, et al. (United States Court of Appeals, District of Columbia Circuit, Case No. 25-1088); *American Fuel & Petrochemical Manufacturers and the American Waterways Operators v. U.S. Environmental Protection Agency, et al.* (United States Court of Appeals, Ninth Circuit, Case No. 25-1615)

American Fuel & Petrochemical Manufacturers v. U.S. Environmental Protection Agency (United States Court of Appeals, District of Columbia Circuit, Case No. 25-1089); *American Fuel & Petrochemical Manufacturers v. U.S. Environmental Protection Agency* (United States Court of Appeals, Ninth Circuit, Case No. 25-1614)

Association of American Railroads et al. v. Randolph et al. (United States District Court, Eastern District of California, Sacramento Division, Case No. 2:23 cv 01154 JAM-JDP)

California Air Resources Board v. Noil Energy Group, Inc. and Speedy Fuel Inc. (Los Angeles County Superior Court, Case Nos. 20STCV30142 and 20STCV30292; California Court of Appeal, Second District, Case No. B339478)

California Trucking Association v. California Air Resources Board (United States District Court, Eastern District of California, Case No. 2:23-cv-02333-TLN-CKD)

Chamber of Commerce of the United States et al. v. California Air Resources Board, et al. (United States District Court, Central District of California, Case No. 2:24-cv-00801)

City of Los Angeles, acting by and through its Department of Water and Power v. California Air Resources Board (Los Angeles County Superior Court of the State of California, Case No. 24STCP01428)

Committee for a Better Arvin, et al v. U.S. Environmental Protection Agency (United States Court of Appeals, Ninth Circuit, Case No. 24-7270)

Commonwealth of Kentucky, et al. v. U.S. Environmental Protection Agency (United States Court of Appeals, District of Columbia Circuit, Case No. 24-1050)

Commonwealth of Kentucky, et al. v. U.S. Environmental Protection Agency, et al. (United States Court of Appeals, District of Columbia Circuit, Case No. 24-1087)

Communities for a Better Environment v. California Air Resources Board, et al. (Fresno County Superior Court, Case No. 24CECG05430); *Defensores del Valle Central para el Aire y Agua Limpio et al. v. California Air Resources Board, et al.* (Fresno County Superior Court, Case No. 24CECG05508); *Growth Energy v. California Air Resources Board, et al.* (Fresno County Superior Court, Case No. 24CECG05514)

Diamond Alternative Energy, LLC, et al. v. U.S. Environmental Protection Agency, et al. (United States Supreme Court, Case No. 24-7); certiorari granted from *Ohio, et al. v. U.S. Environmental Protection Agency, et al.* (United States Court of Appeals, District of Columbia Circuit, Case No. 22-1081; consolidated with Case Nos. 22-1083, 22-1084, and 22-1085)

Environmental Defense Fund, et al. v. Andrew Wheeler, et al. (United States Court of Appeals, District of Columbia Circuit, Case No. 20-1360)

Friends of Oceano Dunes, Inc. v. California Air Resources Board, et al. (San Luis Obispo County Superior Court, Case No. 17CV-0576) and *Friends of Oceano Dunes, Inc. v. California Air Resources Board, et al.* (United States District Court, Central District of California, Case No. 2:17 cv 8733)

Government Accountability and Oversight v. California Air Resources Board (Sacramento County Superior Court, Case No. 24CV012372)

GreenPower Motor Company, Inc. v. California Air Resources Board (Sacramento County Superior Court, Case No. 23WM000083)

Natural Resources Defense Council v. National Highway Traffic Safety Admin., et al. (United States Court of Appeals, District of Columbia Circuit, Case No. 22-1080, consolidated with Case Nos. 22-1144 and 22-1145)

Outdoor Power Equipment Institute v. U.S. Environmental Protection Agency (United States Court of Appeals, Ninth Circuit, Case No. 25-881)

People v. Southern California Gas Company (Los Angeles County Superior Court, Case No. BC602973)

Ryan Murray Partners, Inc. v. California Air Resources Board (Superior Court of California, County of Sacramento, Case No. 25CV005264)

Specialty Equipment Market Association & Performance Racing, Inc., et al. v. California Air Resources Board, et al. (United States District Court, Eastern District of California, Case No. 2:24-cv-02771-TLN-AC)

State of California, et al. v. David Bernhardt, et al. (United States District Court, Northern District of California, 472 F. Supp. 3d 573 (N.D. Cal. 2020) Case No. 3:18 cv 5712 DMR; BLM, Wyoming, and industry appeal to United States Court of Appeals, Ninth Circuit, Case No. 20-16793)

State of California, et al. v. Hino Motors, Ltd. and Hino Motors Manufacturing, U.S.A., Inc. (United States District Court, Eastern District of Michigan, Case Nos. 2:25-cv-10144-SFC-APP, and 2:25-cv-10146-SFC-KGA)

State of California, et al. v. United States, et al. (United States District Court, Northern District of California, Case No. 25-cv-04966)

State of California v. U.S. Environmental Protection Agency (United States Court of Appeals, District of Columbia Circuit, Case No. 21-1034, consolidated with *California Communities Against Toxics et al. v. EPA*, Case No. 21-1024)

State of California, et al. v. U.S. Environmental Protection Agency, et al. (United States Court of Appeals, District of Columbia Circuit, Case No. 21-1014)

State of California v. Wheeler, et al. (United States Court of Appeals, District of Columbia Circuit, Case No. 20-1167; consolidated with other cases under No. 20-1145, *Competitive Enterprise Institute, et al. v. NHTSA, et al.*)

State of Nebraska, et al. v. Steven S. Cliff, et al. (United States District Court, Eastern District of California, Case No. 2:24-cv-01364-TLN-CKD)

State of Nebraska, et al. v. U.S. Environmental Protection Agency, et al. (United States Court of Appeals, District of Columbia Circuit, Case No. 24-1129; consolidated with Case Nos. 24-1133, 24-1157, 24-1207, 24-1208, 24-1209, 24-1210, and 24-1214)

State of New York, et al. v. Donald Trump, et al. (United States District Court, District of Rhode Island, Case No. 1:25-cv-39)

State of New York, et al. v. U. S Environmental Protection Agency, et al. (United States Court of Appeals, District of Columbia Circuit, Case No. 21-1028)

State of North Dakota v. U.S. Environmental Protection Agency (United States Court of Appeals, District of Columbia Circuit, Case No. 15-1381)

State of North Dakota, et al. v. U.S. Environmental Protection Agency, et al. (United States Court of Appeals, District of Columbia Circuit, Case No. 16-1242)

State of Texas, et al. v. U.S. Environmental Protection Agency, et al. (United States Court of Appeals, District of Columbia Circuit, Case No. 22-1031)

State of Texas, et al. v. U.S. Environmental Protection Agency, et al. (United States Court of Appeals, District of Columbia Circuit, Case No. 24-1054)

State of West Virginia, et al. v. U.S. Environmental Protection Agency, et al. (United States Court of Appeals, District of Columbia Circuit, Case No. 24-1009)

State of West Virginia et al. v. U.S. Environmental Protection Agency (United States Court of Appeals, District of Columbia Circuit, Case No. 24-1120)

South Coast Air Quality Management District v. City of Los Angeles, et al. (Los Angeles County Superior Court, Case No. 20STCP02985; transferred to San Diego County Superior Court, Case No. 37-2021-00023385-CU-TT-CTL; appeal California Court of Appeal, Fourth Appellate District, Div. 1, Case. No. D080902; remanded to Superior Court)

The Two Hundred for Homeownership, Robert Apodaca, and Jose Antonio Ramirez v. California Air Resources Board, Steven S. Cliff, in his official capacity, et al. (United States District Court, Eastern District of California, Fresno Division, Case No. 1:22-at-904)

Western Propane Gas Association v. California Air Resources Board, et al. (Fresno County Superior Court, Case No. 24CECG03716)

Western States Petroleum Association v. California Air Resources Board, et al. (Fresno County Superior Court, Case No. 22CECG03603)

Western States Petroleum Association v. U.S. Environmental Protection Agency (United States Court of Appeals, District of Columbia Circuit, Case No. 25-1080)

Western States Petroleum Association v. California Air Resources Board (Fresno County Superior Court, Case No. 23CECG02976); *Western States Trucking Association v. California Air Resources Board* (Fresno County Superior Court, Case No. 23CECG02964)

Western States Trucking Association, Inc. and Construction Industry Air Quality Coalition, Inc. v. U.S. Environmental Protection Agency (United States Court of Appeals, District of Columbia Circuit, Case No. 23-1148)

Opportunity for Members of the Board to Comment on Matters of Interest

Board members may identify matters they would like to have noticed for consideration at future meetings and comment on topics of interest; no formal action on these topics will be taken without further notice.

Open Session to Provide an Opportunity for Members of the Public to Address the Board on Subject Matters within the Jurisdiction of the Board

Although no formal Board action may be taken, the Board is allowing an opportunity to interested members of the public to address the Board on items of interest that are within the Board's jurisdiction, but that do not specifically appear on the agenda. Each person will be allowed a maximum of two minutes to ensure that everyone has a chance to speak. The public will also have an opportunity to [submit written comments](#) for open session the morning of the Board Meeting.

Other Information

[Submit Comments Electronically the Day of the Board Meeting](#)

[View Submitted Comments](#)

Please Note: PowerPoint presentations to be displayed during public comment at the Board meeting must be electronically submitted via email to the Clerks' Office at cotb@arb.ca.gov no later than noon on the business day prior to the scheduled Board Meeting.

If you have any questions, please contact the Clerks' Office:

1001 I Street, 6th Floor, Sacramento, California 95814

cotb@arb.ca.gov or (916) 322-5594

CARB Homepage: www.arb.ca.gov

Special Accommodation Request

Consistent with California Government Code section 7296.2, special accommodation or language needs may be provided for any of the following:

- An interpreter to be available at the hearing;
- Documents made available in an alternate format or another language;
- A disability-related reasonable accommodation.

To request these special accommodations or language needs, please contact the Clerks' Office at cotb@arb.ca.gov or at (916) 322-5594 as soon as possible, but no later than 7 business days before the scheduled Board hearing. TTY/TDD/Speech to Speech users may dial 711 for the California Relay Service.

Acomodación Especial

Consecuente con la sección 7296.2 del Código de Gobierno de California, una acomodación especial o necesidades lingüísticas pueden ser suministradas para cualquiera de los siguientes:

- Un intérprete que esté disponible en la audiencia;
- Documentos disponibles en un formato alternativo u otro idioma;
- Una acomodación razonable relacionados con una incapacidad.

Para solicitar estas comodidades especiales o necesidades de otro idioma, por favor contacte la oficina del Consejo al (916) 322-5594 o por correo electrónico al cotb@arb.ca.gov lo más pronto posible, pero no menos de 7 días de trabajo antes del día programado para la audiencia del Consejo. TTY/TDD/Personas que necesiten este servicio pueden marcar el 711 para el Servicio de Retransmisión de Mensajes de California.

Public Meeting Agenda

Thursday, July 24, 2025 @ 10:00 a.m.

Zoom Webinar: [Register](#)
Phone Number: (888) 557-8511
Conference Code: 583728
Webinar ID: 894 3497 9182



ww2.arb.ca.gov/ma072425

California Environmental Protection Agency

1001 I Street, Sacramento, California 95814
Byron Sher Auditorium, 2nd Floor
[webcast](#) (Livestream/Watch Only)

The July 24, 2025, meeting of the California Air Resources Board (CARB or Board) will be held at 1001 I Street in Sacramento, with remote participation also available. This facility is accessible to persons with disabilities and by public transit. For transit information, call (916) 321-BUSS (2877) or visit <http://sacrt.com/>.

To only watch the Board Meeting and not provide verbal comments, please view the [webcast](#). If you do not wish to provide oral comments, we strongly recommend watching the webcast as this will free up space on the webinar for those who are providing oral comments. Please do not view the webcast and then switch over to the webinar to comment as the webcast will have a time delay; instead, register to participate via the Zoom webinar.

Public Comment Guidelines and Information

- [In-Person Public Testimony](#)
- [Remote Public Participation](#)

The Board will set a two-minute time limit on oral comments; however, the amount of time could change at the Chair's discretion. In-person speakers signed up to comment will be called upon first, followed by public Zoom and phone participants wishing to comment. The Chair may close speaker sign-ups 30 minutes after the public comment portion of an item has begun.

Please note that under the California Public Records Act (Gov. Code, § 7920.000 et seq.), your written and oral comments, attachments, and associated contact information (e.g., your address, phone, email, etc.) become part of the public record and can be released to the public upon request.

Spanish interpretation will be available for the July 24, Board Meeting

- [Agenda de la Reunión Pública](#)

- [Spanish Webcast](#)

Thursday, July 24, 2025 @ 10:00 a.m.

The following agenda items may be heard in a different order at the Board Meeting.

Hard copies of the Public Agenda and Proposed Resolutions (when applicable) will be provided at the meeting; copies of all other documents linked below will only be available upon request.

Discussion Items:

25-5-1: Public Hearing to Consider Proposed Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure

The Board will consider the proposed amendments to the Advanced Clean Trucks regulation and the Zero-Emission Powertrain Certification test procedure.

- [Formal Rulemaking Page](#)
 - [Public Hearing Notice](#)
- [Item Summary](#)
- [Meeting Presentation](#)
- [Proposed Resolution](#)
- [Submit Written Comments](#)
- [View Public Comments](#)

The following Board Item will not be heard prior to 4:00 p.m.

25-5-2: Public Meeting to Hear Community Air Protection Program Annual Progress Update

The Board will hear an update on the implementation of the Community Air Protection Program (CAPP or Program) including monitoring, enforcement, and efforts to support consistently nominated communities.

- [More Information](#)
- [Public Meeting Notice](#)
- [Item Summary](#)
- [Annual Progress Report](#)
- [Meeting Presentations](#)
 - [English Presentation](#)
 - [Spanish Presentation](#)
- [Submit Written Comments](#)
- [View Public Comments](#)

Closed Session

The Board may hold a closed session as authorized by Government Code section 11126(e) to confer with, and receive advice from, its legal counsel regarding the following pending litigation, potential litigation on additional challenges to federal decisions regarding waivers and authorizations, and other matters as authorized by Government Code section 11126(e)(2)(B) or (C):

American Free Enterprise Chamber of Commerce v. Engine Manufacturers Association, et al. (United States District Court, Northern District of Illinois, Western Division, Case No. 3:24-cv-50504)

American Free Enterprise Chamber of Commerce, et al. v. Steven S. Cliff et al. (United States District Court, Eastern District of California, Sacramento Division, Case No. 2:24 cv 00988 KJM-JDP)

American Free Enterprise Chamber of Commerce v. U.S. Environmental Protection Agency (United States Court of Appeals, Ninth Circuit, Case No. 25-89)

American Free Enterprise Chamber of Commerce v. U.S. Environmental Protection Agency (United States Court of Appeals, Ninth Circuit, Case No. 25-106)

American Fuel & Petrochemical Manufacturers and Energy Marketers of America v. U.S. Environmental Protection Agency (United States Court of Appeals, Ninth Circuit, Case No. 25-1481 D.C. Circuit Court of Appeals, Case No. 25-1084); *Outdoor Power Equipment Institute v. U.S. Environmental Protection Agency* (United States Court of Appeals, Ninth Circuit, Case. No. 25-881)

American Fuel & Petrochemical Manufacturers and the American Waterways Operators v. U.S. Environmental Protection Agency, et al. (United States Court of Appeals, District of Columbia Circuit, Case No. 25-1088); *American Fuel & Petrochemical Manufacturers and the American Waterways Operators v. U.S. Environmental Protection Agency, et al.* (United States Court of Appeals, Ninth Circuit, Case No. 25-1615)

American Fuel & Petrochemical Manufacturers v. U.S. Environmental Protection Agency (United States Court of Appeals, District of Columbia Circuit, Case No. 25-1089); *American Fuel & Petrochemical Manufacturers v. U.S. Environmental Protection Agency* (United States Court of Appeals, Ninth Circuit, Case No. 25-1614)

Association of American Railroads et al. v. Randolph et al. (United States District Court, Eastern District of California, Sacramento Division, Case No. 2:23 cv 01154 JAM-JDP)

California Air Resources Board v. Noil Energy Group, Inc. and Speedy Fuel Inc. (Los Angeles County Superior Court, Case Nos. 20STCV30142 and 20STCV30292; California Court of Appeal, Second District, Case No. B339478)

California Trucking Association v. California Air Resources Board (United States District Court, Eastern District of California, Case No. 2:23-cv-02333-TLN-CKD)

Chamber of Commerce of the United States et al. v. California Air Resources Board, et al. (United States District Court, Central District of California, Case No. 2:24-cv-00801)

City of Los Angeles, acting by and through its Department of Water and Power v. California Air Resources Board (Los Angeles County Superior Court of the State of California, Case No. 24STCP01428)

Committee for a Better Arvin, et al v. U.S. Environmental Protection Agency (United States Court of Appeals, Ninth Circuit, Case No. 24-7270)

Commonwealth of Kentucky, et al. v. U.S. Environmental Protection Agency (United States Court of Appeals, District of Columbia Circuit, Case No. 24-1050)

Commonwealth of Kentucky, et al. v. U.S. Environmental Protection Agency, et al. (United States Court of Appeals, District of Columbia Circuit, Case No. 24-1087)

Communities for a Better Environment v. California Air Resources Board, et al. (Fresno County Superior Court, Case No. 24CECG05430); *Defensores del Valle Central para el Aire y Agua Limpio et al. v. California Air Resources Board, et al.* (Fresno County Superior Court, Case No. 24CECG05508); *Growth Energy v. California Air Resources Board, et al.* (Fresno County Superior Court, Case No. 24CECG05514)

Diamond, et al., v. U.S. Environmental Protection Agency (United States Supreme Court, Case No. 24-7, referenced with *Ohio, et al., v. U.S. Environmental Protection Agency, et al.* (United States Supreme Court, Case No. 24-13, United States Court of Appeals, District of Columbia Circuit, 98 F.4th 288 (2024))). *Environmental Defense Fund, et al. v. Andrew Wheeler, et al.* (United States Court of Appeals, District of Columbia Circuit, Case No. 20-1360)

Friends of Oceano Dunes, Inc. v. California Air Resources Board, et al. (San Luis Obispo County Superior Court, Case No. 17CV-0576) and *Friends of Oceano Dunes, Inc. v. California Air Resources Board, et al.* (United States District Court, Central District of California, Case No. 2:17 cv 8733)

Government Accountability and Oversight v. California Air Resources Board (Sacramento County Superior Court, Case No. 24CV012372)

GreenPower Motor Company, Inc. v. California Air Resources Board (Sacramento County Superior Court, Case No. 23WM000083)

Natural Resources Defense Council v. National Highway Traffic Safety Admin., et al. (United States Court of Appeals, District of Columbia Circuit, Case No. 22-1080, consolidated with Case Nos. 22-1144 and 22-1145)

Outdoor Power Equipment Institute v. U.S. Environmental Protection Agency (United States Court of Appeals, Ninth Circuit, Case No. 25-881)

People v. Southern California Gas Company (Los Angeles County Superior Court, Case No. BC602973)

Ryan Murray Partners, Inc. v. California Air Resources Board (Superior Court of California, County of Sacramento, Case No. 25CV005264)

Specialty Equipment Market Association et al. v. California Air Resources Board, Steven S. Cliff, Robert A. Bonta et al. (United States District Court, Eastern District of California, Sacramento Division; Case No. 2:24-cv-02771-TLN-AC)

State of California, et al. v. David Bernhardt, et al. (United States District Court, Northern District of California, 472 F. Supp. 3d 573 (N.D. Cal. 2020) Case No. 3:18 cv 5712 DMR; BLM, Wyoming, and industry appeal to United States Court of Appeals, Ninth Circuit, Case No. 20-16793)

State of California, et al. v. United States, et al. (United States District Court, Northern District of California, Case No. 25-cv-04966)

State of California v. U.S. Environmental Protection Agency (United States Court of Appeals, District of Columbia Circuit, Case No. 21-1034, consolidated with *California Communities Against Toxics et al. v. EPA*, Case No. 21-1024)

State of California, et al. v. U.S. Environmental Protection Agency, et al. (United States Court of Appeals, District of Columbia Circuit, Case No. 21-1014)

State of California v. Wheeler, et al. (United States Court of Appeals, District of Columbia Circuit, Case No. 20-1167; consolidated with other cases under No. 20-1145, *Competitive Enterprise Institute, et al. v. NHTSA, et al.*)

State of Nebraska, et al. v. Steven S. Cliff, et al. (United States District Court, Eastern District of California, Case No. 2:24-cv-01364-TLN-CKD)

State of Nebraska, et al. v. U.S. Environmental Protection Agency, et al. (United States Court of Appeals, District of Columbia Circuit, Case No. 24-1129; consolidated with Case Nos. 24-1133, 24-1157, 24-1207, 24-1208, 24-1209, 24-1210, and 24-1214)

State of New York, et al. v. U. S Environmental Protection Agency, et al. (United States Court of Appeals, District of Columbia Circuit, Case No. 21-1028)

State of North Dakota v. U.S. Environmental Protection Agency (United States Court of Appeals, District of Columbia Circuit, Case No. 15-1381)

State of North Dakota, et al. v. U.S. Environmental Protection Agency, et al. (United States Court of Appeals, District of Columbia Circuit, Case No. 16-1242)

State of Texas, et al. v. U.S. Environmental Protection Agency, et al. (United States Court of Appeals, District of Columbia Circuit, Case No. 22-1031)

State of Texas, et al. v. U.S. Environmental Protection Agency, et al. (United States Court of Appeals, District of Columbia Circuit, Case No. 24-1054)

State of West Virginia, et al. v. U.S. Environmental Protection Agency, et al. (United States Court of Appeals, District of Columbia Circuit, Case No. 24-1009)

State of West Virginia et al. v. U.S. Environmental Protection Agency (United States Court of Appeals, District of Columbia Circuit, Case No. 24-1120)

South Coast Air Quality Management District v. City of Los Angeles, et al. (California Court of Appeal, Fourth District, Div. 1, Case. No. D080902; San Diego County Superior Court, Case No. 37-2021-00023385-CU-TT-CTL)

The Two Hundred for Homeownership, et al v. California Air Resources Board, et al. (United States District Court, Eastern District of California, Fresno Division, Case No. 1:22-at-904)

Valero Renewable et al. v. U.S. Environmental Protection Agency (United States Court of Appeals, District of Columbia Circuit, Case No. 25-1078, consolidated with *American Petroleum Institute v. U.S. Environmental Protection Agency*, United States Court of Appeals, District of Columbia Circuit, Case No. 25-1082; and *American Fuel & Petrochemical Manufacturers et al. v. U.S. Environmental Protection Agency, et al.*, United States Circuit Court of Appeals, District of Columbia Circuit, Case No. 25-1085).

Western Propane Gas Association v. California Air Resources Board, et al. (Fresno County Superior Court, Case No. 24CECG03716)

Western States Petroleum Association v. California Air Resources Board, et al. (Fresno County Superior Court, Case No. 22CECG03603)

Western States Petroleum Association v. U.S. Environmental Protection Agency (United States Court of Appeals, District of Columbia Circuit, Case No. 25-1080)

Western States Petroleum Association v. California Air Resources Board (Fresno County Superior Court, Case No. 23CECG02976)

Western States Trucking Association v. California Air Resources Board (Fresno County Superior Court, Case No. 23CECG02964)

Western States Trucking Association, Inc. and Construction Industry Air Quality Coalition, Inc. v. U.S. Environmental Protection Agency (United States Court of Appeals, District of Columbia Circuit, Case No. 23-1148)

Opportunity for Members of the Board to Comment on Matters of Interest

Board members may identify matters they would like to have noticed for consideration at future meetings and comment on topics of interest; no formal action on these topics will be taken without further notice.

Open Session to Provide an Opportunity for Members of the Public to Address the Board on Subject Matters within the Jurisdiction of the Board

Although no formal Board action may be taken, the Board is allowing an opportunity to interested members of the public to address the Board on items of interest that are within the Board's jurisdiction, but that do not specifically appear on the agenda. Each person will be allowed a maximum of two minutes to ensure that everyone has a chance to speak. The public will also have an opportunity to [submit written comments](#) for open session the morning of the Board Meeting.

Other Information

[Submit Comments Electronically the Day of the Board Meeting](#)

[View Submitted Comments](#)

Please Note: PowerPoint presentations to be displayed during public comment at the Board meeting must be electronically submitted via email to the Clerks' Office at cotb@arb.ca.gov no later than noon on the business day prior to the scheduled Board Meeting.

If you have any questions, please contact the Clerks' Office:

1001 I Street, 6th Floor, Sacramento, California 95814
cotb@arb.ca.gov or (916) 322-5594
CARB Homepage: www.arb.ca.gov

Special Accommodation Request

Consistent with California Government Code section 7296.2, special accommodation or language needs may be provided for any of the following:

- An interpreter to be available at the hearing;
- Documents made available in an alternate format or another language;
- A disability-related reasonable accommodation.

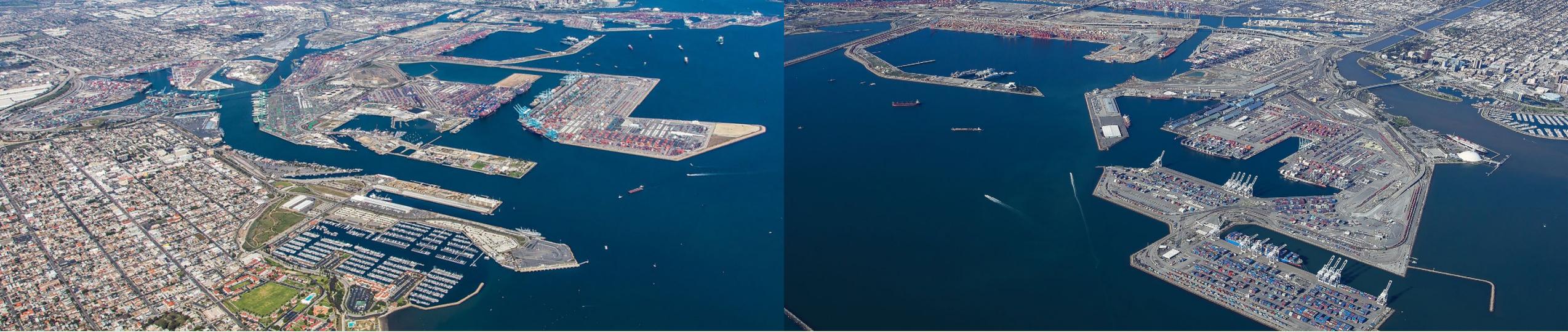
To request these special accommodations or language needs, please contact the Clerks' Office at cotb@arb.ca.gov or at (916) 322-5594 as soon as possible, but no later than 7 business days before the scheduled Board hearing. TTY/TDD/Speech to Speech users may dial 711 for the California Relay Service.

Acomodación Especial

Consecuente con la sección 7296.2 del Código de Gobierno de California, una acomodación especial o necesidades lingüísticas pueden ser suministradas para cualquiera de los siguientes:

- Un intérprete que esté disponible en la audiencia;
- Documentos disponibles en un formato alternativo u otro idioma;
- Una acomodación razonable relacionados con una incapacidad.

Para solicitar estas comodidades especiales o necesidades de otro idioma, por favor contacte la oficina del Consejo al (916) 322-5594 o por correo electrónico al cotb@arb.ca.gov lo más pronto posible, pero no menos de 7 días de trabajo antes del día programado para la audiencia del Consejo. TTY/TDD/Personas que necesiten este servicio pueden marcar el 711 para el Servicio de Retransmisión de Mensajes de California.



Item No 24

[Back to Agenda](#)

Update on Proposed Rule 2304 – Commercial Marine Ports

Board Meeting
August 1, 2025



Background

- ❑ South Coast AQMD does not attain federal or state air quality standards (ozone and PM2.5)
 - Board approved 2016 and 2022 Air Quality Management Plans that includes port-focused Facility-Based Mobile Source Measure
 - Priority action item for the neighboring AB 617 community
- ❑ Mobile sources are ~80% of smog-forming emissions
 - Trucks, ships, locomotives, etc.
- ❑ San Pedro Bay Ports are largest source of smog-forming emissions in the state

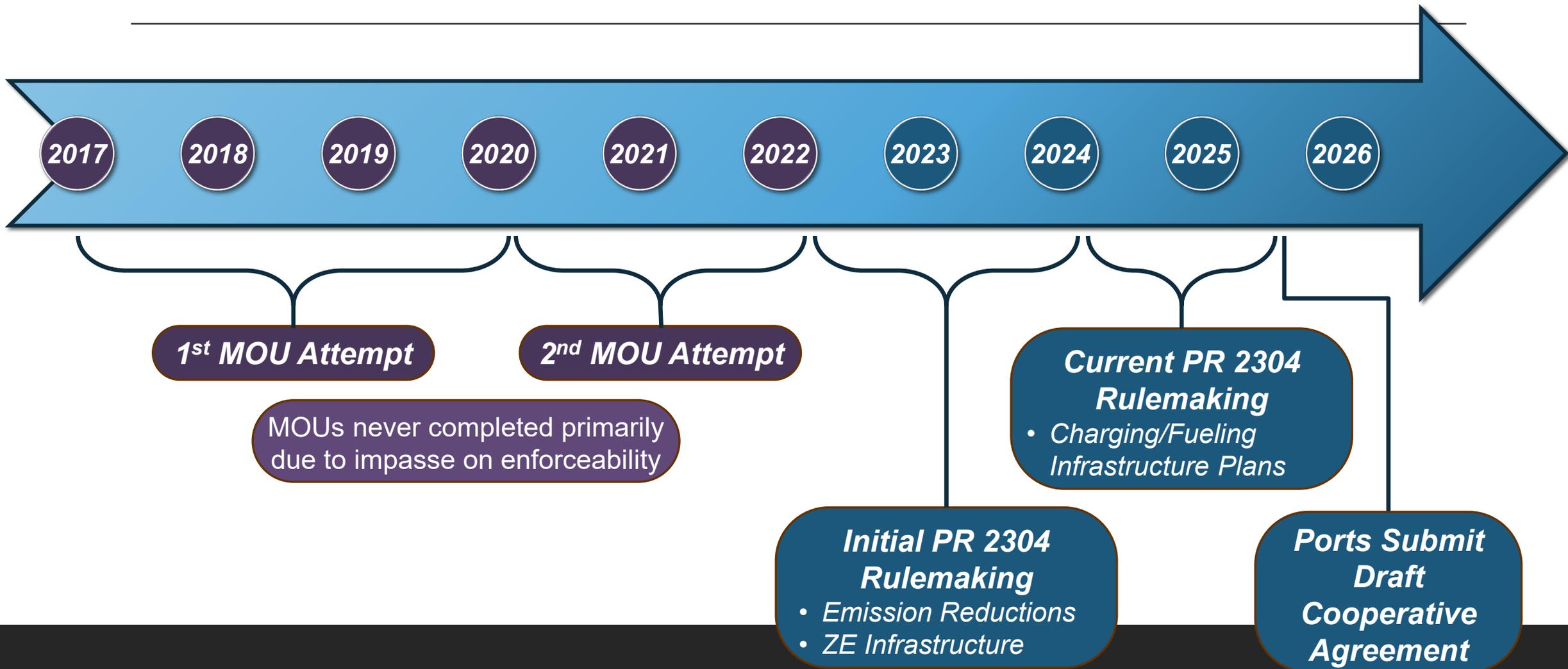
Prior Actions Affecting Port Emissions

- 37% reduction in ports' NOx emissions between 2017-2023
 - Primarily from CARB regulations and bigger ships
- Ports Clean Air Action Plans (CAAP)
 - 2010 CAAP – achieved 2023 emission reduction goals
 - Goals tied to 'defined' measures from AQMP, but not 'black box' measures
 - 2017 CAAP did not include additional emission reduction goals beyond 2023, despite multiple new EPA standards

Why Action Is Still Needed

- ❑ Pathway to attainment is impossible without significant emission reductions from the ports – well beyond currently planned CAAP actions
- ❑ Next generation of cleaner mobile sources needs fueling and charging infrastructure
- ❑ Facility-based measures are increasingly important given loss of waivers

Port Facility-Based Mobile Source Measure Development Since 2016 AQMP



PR 2304 Development Status

Since February 2025 update to full Board:

Two drafts of rule released*

(February 21 and June 13)

Two updates to Mobile Source Committee
Three working group meetings (in-person + virtual)

Considering further revisions to draft rule and
preparing supporting documents

PROPOSED RULE 2304 COMMERCIAL MARINE PORTS

- (a) Purpose
This rule requires the Ports of Long Beach and Los Angeles each to develop a comprehensive plan for charging and fueling infrastructure for equipment, vehicles, and vessels attracted by or used in commercial marine port operations, and whose source of propulsion energy and/or other use of energy is not, or is not primarily, derived from combustion of conventional fuels. This action is necessary to facilitate emission reductions associated with commercial marine ports and from the mobile sources attracted by or used in port operations to meet state and federal air quality standards.
- (b) Applicability
This rule applies to the Port of Long Beach and the Port of Los Angeles as defined in (c)(46) and (c)(47), respectively.
- (c) Definitions
For the purpose of this rule, the following definitions shall apply:
- (1) ACTION LEVEL means, for the purpose of Charging and Fueling Infrastructure planning, a future target level, or target proportion, of a Port Source category population whose source of propulsion energy and/or other use of energy will not be primarily derived from combustion of Conventional Fuels.
 - (2) ALTERNATIVE MARINE FUELS means marine fuels that are not residual oil, gas oil, nor distillate, and used by Ocean Going Vessels.
 - (3) BASIN means the South Coast Air Basin, with its boundaries defined by 40 Code of Federal Regulations, Section 81.305.
 - (4) CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) DOCUMENT means any environmental document prepared by the applicable Lead Agency in accordance with the CEQA Statute and Guidelines as set forth in the Public Resources Code, Division 13 Section 21000 et seq, and in the California Code of Regulations, Title 14 Section 15000 et seq.
 - (5) CAPACITY means the maximum amount of a specific Energy Type that can be dispensed over a set period of time.
 - (6) CARGO means containerized or noncontainerized goods and merchandise that are transported by or transferred between Port Sources and may include empty containers and chassis.
 - (7) CARGO HANDLING EQUIPMENT (CHE) means any self-propelled vehicle or equipment primarily used at a Port Facility, to lift or move Cargo that is carried to or from the Port Facility by other Port Sources.

Overview of PR 2304

Ports Prepare Fueling and Charging Infrastructure Plan

- Due in 2 years
- Evaluate all port sources (ships, trucks, etc.)
- Ports set their own timelines and level of implementation

South Coast AQMD Approves Plan

- Specific approval criteria limiting Executive Officer discretion included in rule
 - Completeness
 - Internal consistency

Ports Implement Approved Plan

- Time Extensions and Plan Modifications allowed
- Ports only responsible for what is in their control

Ports' Draft Cooperative Agreement

- *Developed by the Ports and submitted on July 18, 2025**

Parties

- City of Long Beach**
- City of Los Angeles**
- South Coast AQMD

*** By and through each City's respective Board of Harbor Commissioners*

Term and Effect

- Through 12/31/2035
- Upon signing, South Coast AQMD:
 - Stops PR 2304 rulemaking
 - No future rulemaking or AQMP control measure on enforcing Ports' Clean Air Action Plan (CAAP) goals

Enforceability

- Pending discussion among all parties

Measures in Ports' Draft Cooperative Agreement

- *Six “CAAP Plus” Measures*

Port Source Specific Measures

- Implement grant funded projects and existing commitments/programs
- Evaluate enhancements to Ports' current programs (e.g., OGV incentives)
- Comply with regulations
- Identify and potentially pursue emission-reducing or related facilitating actions beyond existing regulations
 - Seek more grant funding
 - Conduct technical assessments

ZE Infrastructure Plans*



Container Terminal CHE and Drayage Trucks by 10/1/2027



Other Terminal CHE and Local Switchers by 10/1/2029



Harbor Craft and OGV by 10/1/2030

- *Ports approve own Plans*
- *South Coast AQMD receives annual reports*

Initial Comparison Between PR 2304 and Ports' Draft Cooperative Agreement

| Key Elements | PR 2304 | Draft Cooperative Agreement |
|---|---|---|
| General Scope | <ul style="list-style-type: none"> •Infrastructure plans and implementation | <ul style="list-style-type: none"> •Infrastructure plans and implementation •Some CAAP measures •Existing funding programs |
| District role to ensure actions occur | <ul style="list-style-type: none"> •District approves plans, time extensions, and plan modifications •District ensures ports comply with approved plans | <ul style="list-style-type: none"> •District is an observer |
| Flexibility in infrastructure planning and implementation | Similar | |

Initial Staff Concerns on Ports' Draft Cooperative Agreement

- ❑ Enforceability is left open as placeholder for further discussion
- ❑ 10-year prohibition on rulemaking
- ❑ District role limited to quantifying emission reductions and making info available to the public
 - District solely liable for any State Implementation Plan emission reduction shortfalls
- ❑ Several provisions should be revised if Board is going to consider adoption
- ❑ All SIP control measures related to ports must cease if agreement adopted
- ❑ Public process critical for finalizing agreement

Potential Options

A

Pursue rulemaking

B

Pursue Cooperative Agreement in a public process

C

Parallel path approach - Continue to pursue rulemaking *and* work with Ports in a public process on Draft Cooperative Agreement

- ❑ Goal to bring an action to Board for consideration by December
- ❑ Regularly update Mobile Source Committee on effort and schedule

BOARD MEETING DATE: August 1, 2025

AGENDA NO. 25

PROPOSAL: Determine That South Coast Air Basin Contingency Measure SIP Revision for 2015 8-Hour Ozone NAAQS Is Exempt from CEQA; and Adopt South Coast Air Basin Contingency Measure SIP Revision for 2015 8-Hour Ozone NAAQS

SYNOPSIS: The South Coast Air Basin is classified as “extreme” nonattainment for the 2015 8-hour ozone National Ambient Air Quality Standard (NAAQS). The 2022 AQMP outlined a strategy to meet the NAAQS and aimed to satisfy all federal CAA requirements applicable to extreme nonattainment areas, except for the contingency measure requirement which was not finalized. In December 2024, U.S. EPA finalized its contingency measure guidance. The South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS was developed in response to U.S. EPA’s new guidance to fulfill the requirements specified in CAA sections 172(c)(9) and 182(c)(9). The contingency measures for this standard include three South Coast AQMD rules to achieve additional VOC reductions and CARB’s California Smog Check Contingency Measure.

COMMITTEE: Mobile Source: April 18, 2025; Reviewed

RECOMMENDED ACTION:

Adopt the attached Resolution:

1. Determining that the South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS is exempt from the requirements of the California Environmental Quality Act; and
2. Adopting the South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS and directing staff to forward the South Coast Ozone Contingency SIP Revision to CARB for approval and submission to U.S. EPA for inclusion in the SIP.

Wayne Natri
Executive Officer

Background

The South Coast Air Basin (Basin) is an “extreme” nonattainment area for the 2015 8-hour ozone standard, with an attainment date of August 3, 2038. The 2022 AQMP addressed the strategy to meet the standard by the due date and intended to satisfy all Clean Air Act (CAA) requirements applicable to “extreme” nonattainment areas except the provisions for contingency measures. Contingency measures are defined by CAA Section 172(c)(9) as “specific measures to be undertaken if the area fails to make reasonable further progress, or to attain the national primary ambient air quality standard by the attainment date.” In addition, CAA Section 182(c)(9) requires contingency measures upon failure to meet a reasonable further progress milestone. In response to court decisions that invalidated prior interpretations of contingency measure requirements, U.S. EPA was developing updated contingency measure guidance at the time the 2022 AQMP was adopted. Therefore, the 2022 AQMP did not formally address contingency measure requirements, but committed to address them once U.S. EPA issued new guidance.

In December 2024, U.S. EPA released Guidance on Preparation of State Implementation Plan Provisions that Address the Nonattainment Area Contingency Measure Requirements for Ozone and Particulate Matter (guidance). Briefly, U.S. EPA’s guidance recommends that contingency measures be adopted into rules that contain automatic triggering mechanisms, become effective within 60 days, achieve emission reductions within up to two years of the triggering event, and achieve reductions equivalent to one year’s worth of progress. If less than one year’s worth of reductions are achieved from contingency measures, justification is required that no other measures are feasible based on technological, economic, or implementation timeline considerations.

Proposal

The South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS (South Coast Ozone Contingency SIP Revision) has been developed to be consistent with U.S. EPA’s guidance and comply with CAA Sections 172(c)(9) and 182(c)(9). It includes ozone contingency measures in three South Coast AQMD rules: Rule 445 – Wood-Burning Devices, Rule 463 – Organic Liquid Storage, and Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants. The contingency measures have already been adopted into the aforementioned rules. The South Coast Ozone Contingency SIP Revision also includes the California Smog Check Contingency Measure, adopted by CARB in October 2023. These contingency measures contain a triggering mechanism to automatically implement the measure upon a qualifying event, such as failure to attain the standard or meet a reasonable further progress milestone. If triggered, these contingency measures will further reduce NO_x and VOC emissions. However, because the contingency measures achieve less than one year’s worth of progress, the South Coast Ozone Contingency SIP Revision includes a robust infeasibility justification, in

accordance with U.S. EPA guidance. This justification demonstrates the scarcity of remaining emission reduction opportunities in the Basin. Chapter 4 of the Draft Final Staff Report outlines the multiple steps taken to support this justification, including: identifying all emission sources in the Basin, reviewing the applicable rules for each source category, comparing the stringency of those rules with those in other air basins, and evaluating potential additional measures within the framework of the contingency measure requirements.

Public Process

The Draft South Coast Contingency Measure SIP Revision was released on April 24, 2025, and a Public Consultation Meeting was held on May 20, 2025. One comment letter was received on the Draft South Coast Ozone Contingency SIP Revision and a response is included in Chapter 5 of the Draft Final Staff Report, Attachment B to this Board Letter. The three South Coast AQMD rules included in the South Coast Contingency Measure SIP Revision were developed through a public process.

Resource Impacts

The South Coast Air Basin Contingency Measure SIP Revision will have nominal impacts on South Coast AQMD resources.

California Environmental Quality Act (CEQA)

Pursuant to CEQA Guidelines Sections 15002(k) and 15061, the proposed project (South Coast Air Basin Contingency Measure SIP Revision) is exempt from CEQA pursuant to CEQA Guidelines Sections 15061(b)(3) and 15308. Further, there is no substantial evidence indicating that any of the exceptions in CEQA Guidelines Section 15300.2 apply to the proposed project. A Notice of Exemption has been prepared pursuant to CEQA Guidelines Section 15062, and is included as Attachment C to this Board Letter. If the proposed project is approved, the Notice of Exemption will be filled for posting with the county clerks of Los Angeles, Orange, Riverside, and San Bernardino, and with the State Clearinghouse of the Governor's Office of Land Use and Climate Innovation.

Socioeconomic Impact Assessment

No socioeconomic impact assessment is required under Health and Safety Code Sections 40440.8 and 40728.5, because the proposed project is not a rule or regulation within the meaning of those statutes. Further, no socioeconomic impacts will result from the proposed project.

AQMP and Legal Mandates

The South Coast Contingency Measure SIP Revision has been developed to comply with the CAA and U.S. EPA's guidance for contingency measures.

Attachments

- A. Resolution
- B. Draft Final Staff Report for South Coast Air Basin Contingency Measure SIP
Revision for the 2015 8-Hour Ozone NAAQS
- C. Notice of Exemption from CEQA
- D. Board Presentation

ATTACHMENT A

RESOLUTION NO. 25-_____

A Resolution of the South Coast Air Quality Management District (South Coast AQMD) Governing Board determining that the South Coast Air Basin Contingency Measure State Implementation Plan (SIP) Revision for the 2015 8-Hour Ozone NAAQS (South Coast Ozone Contingency SIP Revision) is exempt from the requirements of the California Environmental Quality Act (CEQA).

A Resolution of the South Coast AQMD Governing Board adopting the South Coast Ozone Contingency SIP Revision and directing staff to forward the South Coast Ozone Contingency SIP Revision to the California Air Resources Board (CARB) for approval and subsequent submission to the United States Environmental Protection Agency (U.S. EPA) for inclusion in the SIP.

WHEREAS, the South Coast AQMD Governing Board finds and determines that the South Coast Ozone Contingency SIP Revision is considered a “project” pursuant to CEQA; and

WHEREAS, the South Coast AQMD Governing Board finds and determines after conducting a review of the proposed project (South Coast Ozone Contingency SIP Revision) in accordance with CEQA Guidelines Section 15002(k) – General Concepts, the three-step process for deciding which document to prepare for a project subject to CEQA, and CEQA Guidelines Section 15061 – Review for Exemption, procedures for determining if a project is exempt from CEQA, that the South Coast Ozone Contingency SIP Revision is exempt from CEQA; and

WHEREAS, the South Coast AQMD Governing Board finds and determines that the South Coast Ozone Contingency SIP Revision relies on existing contingency measures from previously adopted rules, does not propose new requirements which will result in additional physical modifications, and will not result in adverse environmental impacts. Thus, it can be seen with certainty that there is no possibility that the proposed project may have any significant adverse effects on the environment and is therefore exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3) – Common Sense Exemption; and

WHEREAS, the South Coast AQMD Governing Board finds and determines that the proposed project is also categorically exempt from CEQA pursuant to CEQA Guidelines Section 15308 – Actions by Regulatory Agencies for Protection of the Environment, because the South Coast Ozone Contingency SIP Revision is intended to further protect or enhance the environment; and

WHEREAS, the South Coast AQMD Governing Board has determined that there is no substantial evidence indicating that any of the exceptions to the categorical exemption as set forth in CEQA Guidelines Section 15300.2 – Exceptions, apply to the proposed project; and

WHEREAS, the South Coast AQMD staff has prepared a Notice of Exemption for the proposed project, that is completed in compliance with CEQA Guidelines Section 15062 – Notice of Exemption; and

WHEREAS, the South Coast Ozone Contingency SIP Revision and supporting documentation, including but not limited to, the Notice of Exemption and Draft Final Staff Report, were presented to the South Coast AQMD Governing Board, and the South Coast AQMD Governing Board has reviewed and considered this information, and has taken and considered staff testimony and public comments prior to approving the project; and

WHEREAS, the South Coast Air Basin (Basin) was designated as an “extreme” nonattainment area for the 2015 8-hour ozone National Ambient Air Quality Standard (NAAQS) with attainment by 2037; and

WHEREAS, the 2022 Air Quality Management Plan (AQMP), adopted by the South Coast AQMD Governing Board on December 2, 2022, and submitted to the U.S. EPA via CARB on February 23, 2023, calls for an economy-wide transition to zero emissions technology wherever feasible to reduce emissions of ozone precursors, nitrogen oxides (NOx) and volatile organic compounds (VOC), to meet the 2015 ozone standard by 2037; and

WHEREAS, while the 2022 AQMP satisfied most Clean Air Act (CAA) requirements applicable to “extreme” nonattainment areas, it did not formally address contingency measure requirements in CAA Sections 172(c)(9) and 182(c)(9) due to the lack of U.S. EPA’s guidance at the time the 2022 AQMP was adopted. Therefore, the 2022 AQMP committed to address contingency measure requirements once U.S. EPA issued new guidance; and

WHEREAS, contingency measures are defined by CAA Section 172(c)(9) as specific measures to be undertaken if the area fails to make reasonable further progress, or to attain the standard by the attainment date. CAA Section 182(c)(9) further requires that ozone nonattainment areas classified as “serious” or above provide for contingency measures to be implemented if the area fails to meet any applicable milestone; and

WHEREAS, U.S. EPA finalized new contingency measure guidance in December 2024, introducing changes regarding the recommended amount of emission reductions, the process to demonstrate the scarcity of additional contingency measures, and the implementation timeline for contingency measures; and

WHEREAS, the South Coast Ozone Contingency SIP Revision includes ozone contingency measures in three South Coast AQMD rules: Rule 445 – Wood-Burning Devices (Amended October 27, 2020), Rule 463 – Organic Liquid Storage (Amended June 7, 2024), and Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants (Amended November 1, 2024); and

WHEREAS, the South Coast Ozone Contingency SIP Revision also includes the California Smog Check Contingency Measure, adopted by CARB in October 2023; and

WHEREAS, these contingency measures achieve additional reductions beyond those needed for attainment and include an automatic triggering mechanism; and

WHEREAS, despite reducing VOC and NOx emissions, these contingency measures do not achieve U.S. EPA’s recommended amount of emission reductions. Therefore, the South Coast Ozone Contingency SIP Revision includes an infeasibility justification, demonstrating the scarcity of remaining measures; and

WHEREAS, the Draft South Coast Ozone Contingency SIP Revision was released for public review and comment on April 24, 2025, with a comment period from April 24, 2025 to May 30, 2025; and

WHEREAS, a public consultation meeting was held on May 20, 2025 to solicit comments and suggestions from the public, affected businesses, and stakeholders; and

WHEREAS, the South Coast AQMD Governing Board has determined that no Socioeconomic Impact Assessment is required under Health and Safety Code Sections 40440.8 and 40728.5, because the South Coast Ozone Contingency SIP Revision is not a rule or regulation in the meaning of those statutes, and further no socioeconomic impacts will result from the South Coast Ozone Contingency SIP Revision; and

WHEREAS, the public hearing has been properly noticed in accordance with all provisions regarding notice of revisions to the SIP in the Code of Federal Regulations Title 40, Part 51, Section 51.102; and

WHEREAS, the South Coast AQMD Governing Board has held a public hearing in accordance with all provisions of law; and

WHEREAS, the South Coast AQMD specifies the Planning and Rules Manager of the South Coast Ozone Contingency SIP Revision as the custodian of the documents or other materials which constitute the record of proceedings upon which the adoption of the South Coast Ozone Contingency SIP Revision is based, which are located at the South Coast AQMD, 21865 Copley Drive, Diamond Bar, California; and

NOW, THEREFORE BE IT RESOLVED, that the South Coast AQMD Governing Board does hereby determine, pursuant to the authority granted by law, that the South Coast Ozone Contingency SIP Revision is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3) – Common Sense Exemption, and CEQA Guidelines Section 15308 – Actions by Regulatory Agencies for the Protection of the Environment. No exceptions to the application of the categorical exemption set forth in CEQA Guidelines Section 15300.2 – Exceptions, apply to the proposed project. This information was presented to the South Coast AQMD Governing Board, whose members exercised their independent judgment and reviewed, considered, and approved the information therein prior to acting on the South Coast Ozone Contingency SIP Revision; and

BE IT FURTHER RESOLVED, that the South Coast AQMD Governing Board, whose members reviewed, considered, and approved the information contained in the documents listed herein, adopts the South Coast Ozone Contingency SIP Revision dated August 1, 2025 consisting of the document entitled South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone Standard as amended by the final changes, if applicable, set forth by the South Coast AQMD Governing Board; and

BE IT FURTHER RESOLVED, that the South Coast AQMD Governing Board directs the Executive Officer to work with CARB and the U.S. EPA and take appropriate action to resolve any completeness or approvability issues that may arise regarding the SIP submission; and

BE IT FURTHER RESOLVED, that the Executive Officer is hereby directed to forward a copy of this Resolution and the South Coast Ozone Contingency SIP Revision to CARB for approval and subsequent submission to the U.S. EPA for inclusion in the SIP.

DATE: _____

CLERK OF THE BOARDS

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Draft Final Staff Report

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS Standard

~~April~~ July 2025

Sarah L. Rees, Ph.D.

Deputy Executive Officer

Planning, Rule Development, and Implementation

Ian MacMillan

Assistant Deputy Executive Officer

Planning, Rule Development, and Implementation

Sang-Mi Lee, Ph.D.

Planning and Rules Manager

Planning, Rule Development, and Implementation

Authors:

Eric Praske, Ph.D. – Program Supervisor

Jong Hoon Lee, Ph.D. – Air Quality Specialist

Kayla Jordan – Air Quality Specialist

Contributors:

Barbara Radlein – Planning and Rules Manager

Kevin Ni - Program Supervisor

Farzaneh Khalaj, Ph.D. ~~Jivar Afshar~~ – Air Quality Specialist

Reviewed By:

Barbara Baird, J.D. – Chief Deputy Counsel

Daphne Hsu, J.D. – Principal Deputy District Counsel

Kathryn Roberts, J.D. – Principal Deputy District Counsel

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
GOVERNING BOARD**

Chair: VANESSA DELGADO
Senator (Ret.)
Senate Rules Committee Appointee

Vice Chair: MICHAEL A. CACCIOTTI
Councilmember, South Pasadena
Cities of Los Angeles County/Eastern Region

MEMBERS:

CURT HAGMAN
Supervisor, Fourth District
County of San Bernardino

PATRICIA LOCK DAWSON
Mayor, Riverside
Cities of Riverside County Representative

LARRY MCCALLON
Mayor Pro Tem, Highland
Cities of San Bernardino County

HOLLY J. MITCHELL
Supervisor, Second District
County of Los Angeles

JANET NGUYEN
Supervisor, First District
County of Orange

BRENDA OLMOS
Councilmember, Paramount
Cities of Los Angeles County/Western Region

VERONICA PADILLA-CAMPOS
Speaker of the Assembly Appointee

V. MANUEL PEREZ
Supervisor, Fourth District
County of Riverside

NITHYA RAMAN
Councilmember, Fourth District
City of Los Angeles Representative

CARLOS RODRIGUEZ
Mayor Pro Tem, Yorba Linda
Cities of Orange County

VACANT
Governor's Appointee

EXECUTIVE OFFICER:
WAYNE NASTRI

Table of Contents

Executive Summary

| | |
|--|------|
| Overview | ES-1 |
| U.S. EPA’s Updated Contingency Measure Guidance..... | ES-1 |
| Contingency Measures for Stationary and Mobile Sources | ES-2 |

Chapter 1 - Introduction

| | |
|--|-----|
| Background on the 2022 AQMP | 1-1 |
| Legal Challenges and U.S. EPA’s Guidance for Contingency Measures..... | 1-1 |
| South Coast AQMD’s Opportunities for Contingency Measures..... | 1-3 |
| Contingency Measures for the 2008 8-hour Ozone Standard..... | 1-4 |
| Format of This Document..... | 1-5 |

Chapter 2 - Emissions Inventory

| | |
|---|-----|
| Emissions Inventory | 2-1 |
| Emissions from the South Coast Air Basin..... | 2-1 |
| One Year’s Worth of Progress for NOx and VOC..... | 2-9 |

Chapter 3 - South Coast AQMD's Contingency Measures

| | |
|---|-----|
| Contingency Measure Identification and Analysis | 3-1 |
| Rule 445..... | 3-1 |
| Rule 463..... | 3-2 |
| Rule 1173..... | 3-3 |
| Comparison to OYW of Reductions | 3-4 |

Chapter 4 - Infeasibility Justification

| | |
|--|-------|
| Reasoned Justification for Contingency Measures Achieving Less than One Year’s Worth of Progress | 4-1 |
| Fuel Combustion..... | 4-1 |
| 1. Boilers, Steam Generators, and Process Heaters | 4-2 |
| 2. Reciprocating Internal Combustion Engines (RICE)..... | 4-10 |
| 3. Combustion Turbines | 4-20 |
| 4. Residential and Commercial Fuel Combustion..... | 4-26 |
| 5. Other Fuel Combustion | 4-35 |
| Waste Disposal | 4-44 |
| 1. Landfills | 4-45 |
| 2. Sewage Treatment | 4-48 |
| 3. Composting | 4-48 |
| 4. Incinerators | 4-53 |
| Cleaning and Surface Coatings | 4-56 |
| 1. Laundering | 4-63 |
| 2. Degreasing | 4-66 |
| 3. Coatings and Related Processes..... | 4-77 |
| 4. Printing..... | 4-119 |
| 5. Adhesives and Sealants..... | 4-129 |
| 6. Other (Cleaning and Surface Coatings)..... | 4-140 |
| Petroleum Production and Marketing..... | 4-143 |
| 1. Refining Process Fugitive Losses | 4-147 |

| | |
|--|-------|
| 2. Storage Tanks and Related Losses | 4-185 |
| 3. Gas Transmission and Dispensing Losses | 4-191 |
| 4. Fuel Transfer and Dispensing Losses | 4-196 |
| 5. Miscellaneous/Other Fugitive Losses | 4-209 |
| 6. Cargo Tanks Fugitive Losses | 4-217 |
| Industrial Processes | 4-217 |
| 1. Chemical | 4-218 |
| 2. Food and Agriculture | 4-237 |
| 3. Mineral Processes | 4-242 |
| 4. Metal Processes | 4-248 |
| 5. Wood and Paper | 4-253 |
| 6. Glass and Related Products | 4-253 |
| 7. Electronics | 4-254 |
| 8. Other (Industrial Processes) | 4-256 |
| Solvent Evaporation | 4-257 |
| 1. Consumer Products | 4-257 |
| 2. Architectural Coatings | 4-258 |
| 3. Pesticides and Fertilizers | 4-269 |
| 4. Asphalt Paving and Roofing | 4-269 |
| Miscellaneous Processes | 4-273 |
| 1. Residential Fuel Combustion | 4-273 |
| 2. Farming Operations | 4-274 |
| 3. Fugitive Dust Categories | 4-276 |
| 4. Fires | 4-276 |
| 5. Managed Burning and Disposal (Open Burning) | 4-276 |
| 6. Commercial Cooking | 4-284 |
| 7. Other (Miscellaneous Processes) | 4-287 |
| Conclusion | 4-290 |

Chapter 5 - Public Process

| | |
|---|------------|
| Public Process | 5-1 |
| <u>Written Comments and Responses to Comments</u> | <u>5-1</u> |

Chapter 6 - California Environmental Quality Act

| | |
|---|-----|
| California Environmental Quality Act (CEQA) | 6-1 |
| Socioeconomic Impact Assessment | 6-1 |

Chapter 7 - Staff Recommendation

| | |
|----------------------------|-----|
| Staff Recommendation | 7-1 |
|----------------------------|-----|

Appendix A: California Smog Check Contingency Measure State Implementation Plan Revision

Appendix B: CARB's Area Source Infeasibility Justification

Appendix C: Transportation Control Measures Infeasibility Justification

Appendix D: Emission Sources and Applicable Rules

**South Coast Air Basin Contingency Measure SIP Revision
for the 2015 8-Hour Ozone NAAQS Standard**

EXECUTIVE SUMMARY

Overview

The South Coast Air Basin (Basin) is in “extreme” nonattainment of the 2015 8-hour ozone National Ambient Air Quality Standard (NAAQS or standard). In December 2022, the South Coast Air Quality Management District (South Coast AQMD) adopted the 2022 Air Quality Management Plan (AQMP), which provides the strategy for the Basin to meet the 2015 8-hour ozone standard by 2037.¹ This plan called for an economy-wide transition to zero emissions technology wherever feasible to reduce emissions of ozone precursors, nitrogen oxides (NOx) and volatile organic compounds (VOC), leaving few opportunities for further emission reductions.

While the 2022 AQMP satisfied most Clean Air Act (CAA) requirements applicable to “extreme” nonattainment areas, it did not formally address contingency measure requirements due to the lack of U.S. EPA’s guidance at the time of adoption. Contingency measures are defined by CAA Section 172(c)(9) as “specific measures to be undertaken if the area fails to make reasonable further progress, or to attain the national primary ambient air quality standard by the attainment date.” At the time the 2022 AQMP was adopted, U.S. EPA was developing updated contingency measure guidance as courts had invalidated certain aspects of its prior interpretation of contingency measure requirements. Therefore, the 2022 AQMP committed to address contingency measure requirements once U.S. EPA issued new guidance. In December 2024, U.S. EPA issued updated contingency measure guidance.² The South Coast Air Basin Contingency Measure State Implementation Plan (SIP) Revision for the 2015 8-Hour Ozone Standard (South Coast Ozone Contingency SIP Revision) has been developed in response to the new guidance to satisfy contingency measure requirements in the Basin.

U.S. EPA’s Updated Contingency Measure Guidance

In response to court decisions which altered the interpretation of contingency measure requirements, U.S. EPA’s new contingency measure guidance introduces key changes affecting the following three aspects of contingency measures:

1. The recommended quantity of emission reductions to be achieved by contingency measures.
2. The documentation needed to support a claim that there are insufficient contingency measures to achieve the recommended emission reductions.
3. The length of time during which emission reductions from contingency measures must be achieved.

¹ South Coast AQMD, 2022 Air Quality Management Plan, December 2022.

<https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16>

² U.S. EPA, Guidance on the Preparation of State Implementation Plan Provisions that Address the Nonattainment Area Contingency Measure Requirements for Ozone and Particulate Matter. December 3, 2024.

https://www.epa.gov/system/files/documents/2024-12/cmtf-final-guidance-signature-version-11-22-24_clean_0.pdf

Previously, the recommended amount of emission reductions was fixed at 3 percent of the base year inventory. U.S. EPA now recommends that contingency measures achieve emission reductions that are equivalent to One Year's Worth (OYW) of progress. OYW of progress provides greater flexibility by considering the amount of emission reductions an area needs to meet the standard.

If contingency measures do not achieve OYW of progress, U.S. EPA's guidance requires the development of a reasoned justification for achieving less than the recommended amount. The justification seeks to identify and evaluate potential contingency measures based on their technological and economic feasibility, while also considering that contingency measures must be implemented and achieve emission reductions within two years.

Contingency Measures for Stationary and Mobile Sources

The South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS Standard includes contingency measures for both stationary and mobile sources that reduce NOx and VOC emissions. Consistent with the CAA and U.S. EPA's guidance, the contingency measures achieve additional reductions beyond those needed for attainment and satisfy the requirement for a triggering mechanism to automatically implement the measure upon a failure to attain or achieve a reasonable further progress (RFP) milestone.

For stationary sources, South Coast AQMD has introduced contingency measures in three rules: Rule 445 – Wood-Burning Devices, Rule 463 – Organic Liquid Storage, and Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants. Briefly, the rules implement contingency measures through a wood burning curtailment program and enhanced leak detection and repair. If triggered, contingency measures in all three rules would be implemented simultaneously. Rules 445 and 1173 contain multiple contingency measures which are designed to be implemented sequentially.

A mobile source contingency measure, the California Smog Check Contingency Measure State Implementation Plan Revision, was adopted by the California Air Resources Board (CARB) in October 2023.³ Currently, new vehicles are exempt from the smog check program for the first 8 years. If triggered, the contingency measure will narrow the newer model year vehicle smog check exemption from 8 to 7 years and 7 to 6 years upon the first and second triggering, respectively. Emission reductions would be achieved by identifying additional emissions control equipment failures from vehicles previously exempt. On July 9, 2024, U.S. EPA approved the smog check contingency measure.⁴

³ CARB, California Smog Check Contingency Measure State Implementation Plan Revision, September 15, 2023. https://ww2.arb.ca.gov/sites/default/files/2023-09/Smog_Check_CM_SIP_Revision_Final.pdf

⁴ U.S. EPA, Air Plan Revisions; California; Vehicle Inspection and Maintenance Contingency Measure, 89 Fed. Reg. 56222 (July 9, 2024). <https://www.federalregister.gov/documents/2024/07/09/2024-14355/air-plan-revisions-california-vehicle-inspection-and-maintenance-contingency-measure>

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

The stationary and mobile source contingency measures achieve less than OYW of progress for the 2015 8-hour ozone standard in the Basin. Therefore, consistent with U.S. EPA's guidance, the South Coast Ozone Contingency SIP Revision contains infeasibility justifications demonstrating the scarcity of further contingency measure opportunities for all stationary and mobile source categories contributing VOC and NOx emissions in the Basin.

The South Coast Ozone Contingency SIP Revision seeks to fulfill contingency measure requirements in CAA Sections 172(c)(9) and 182(c)(9) and comply with applicable case law. Staff recommends adoption of the South Coast Ozone Contingency SIP Revision for submission to U.S. EPA via CARB.

**South Coast Air Basin Contingency Measure SIP Revision
for the 2015 8-Hour Ozone NAAQS Standard**

CHAPTER 1: INTRODUCTION

Background on the 2022 AQMP

In December 2015, the United States Environmental Protection Agency (U.S. EPA) revised the National Ambient Air Quality Standard (NAAQS or standard) for ozone, lowering the threshold to 70 parts per billion, averaged over an 8-hour period. The South Coast Air Basin (Basin), including Orange County and urban portions of Los Angeles, Riverside, and San Bernardino counties, was designated as an “extreme” nonattainment area for the 2015 ozone standard with attainment by 2037. The 2022 Air Quality Management Plan (AQMP) outlines a strategy to meet this standard by 2037 through an economy-wide transition to zero emissions technology, wherever feasible, to reduce emissions of ozone precursors, nitrogen oxides (NOx) and volatile organic compounds (VOC).⁵ The 2022 AQMP control strategy is expected to reduce NOx emissions by about 67 percent over 2037 baseline (i.e., business-as-usual) levels, and about 83 percent below 2018 levels.

While the 2022 AQMP satisfied most Clean Air Act (CAA) requirements applicable to “extreme” nonattainment areas, it did not formally address contingency measure requirements due to the absence of U.S. EPA’s guidance at the time adoption. Contingency measures are defined by CAA Section 172(c)(9) as “specific measures to be undertaken if the area fails to make reasonable further progress, or to attain the national primary ambient air quality standard by the attainment date.” CAA Section 182(c)(9) further requires that ozone nonattainment areas classified as “serious” or above provide for contingency measures to be implemented if the area fails to meet any applicable milestone. These measures are to be adopted and held in reserve to be automatically triggered in the aforementioned scenarios. Concurrently, nonattainment areas are obligated to implement all feasible measures to reduce emissions, and to attain ambient air quality standards as expeditiously as possible.

Legal Challenges and U.S. EPA’s Guidance for Contingency Measures

While the CAA requires contingency measures, it does not specify the amount of emission reductions needed for these measures. Historically, the U.S. EPA has interpreted the amount of emission reductions needed as equivalent to one year’s worth of progress and has also allowed states to meet contingency measure requirements by relying on excess emission reductions from the ongoing implementation of adopted emission reduction programs. However, a series of court decisions reshaped the interpretation of these requirements. In the 2016 case of *Bahr v. U.S. Environmental Protection Agency*⁶ (*Bahr*), the 9th Circuit Court of Appeals ruled the U.S. EPA erred in approving a contingency measure that relied on an already-implemented measure for a nonattainment area in Arizona, thereby rejecting the U.S. EPA’s

⁵ The 2022 AQMP was adopted by the South Coast AQMD’s Governing Board on December 2, 2022 and submitted to U.S. EPA on February 23, 2023 via CARB.

⁶ *Bahr v. U.S. Environmental Protection Agency*, (9th Cir. 2016) 836 F.3d 1218

longstanding interpretation of CAA Section 172(c)(9). The U.S. EPA staff interpreted this decision to mean that contingency measures must include a future action triggered by a failure to attain, failure to make reasonable further progress, or failure to submit a quantitative milestone report. This decision was applicable to the states covered by the 9th Circuit Court, while the U.S. EPA continued to approve contingency measures using their pre-Bahr stance in the rest of country. In January 2021, in the case of *Sierra Club v. Environmental Protection Agency*,⁷ the United States Court of Appeals for the D.C. Circuit, ruled that already implemented measures do not qualify as contingency measures for the rest of the country (*Sierra Club*).

In response to *Bahr* and the necessity to develop contingency measures for the 75 ppb 8-hour ozone SIPs, the California Air Resources Board (CARB) developed the statewide Enhanced Enforcement Contingency Measure (Enforcement Contingency Measure), which was included in the *2018 Updates to the California State Implementation Plan*. CARB collaborated closely with the U.S. EPA regional staff in developing the contingency measure package that included the triggered Enforcement Contingency Measure, a district-triggered measure/commitment, and emission reductions from the on-going implementation of CARB's mobile source emissions program. However, in their action on the *San Joaquin Valley 2016 Ozone Plan for 2008 8-hour Ozone Standard SIP*, the U.S. EPA stated that the Enforcement Contingency Measure did not satisfy the requirements to be approved as a "standalone contingency measure" and approved it only as a "SIP strengthening" measure. The U.S. EPA did approve the district's triggered measure and the implementation of the mobile reductions along with a CARB emission reduction commitment as meeting the contingency measure requirement for this SIP.

The Association of Irrigated Residents filed a lawsuit against the U.S. EPA for their approval of various elements within the *San Joaquin Valley 2016 Ozone Plan for 2008 8-hour Ozone Standard*, including the contingency measure. The 9th Circuit Court of Appeals issued its decision in *Association of Irrigated Residents v. EPA*⁸ (*AIR*) that the U.S. EPA's approval of the contingency element was arbitrary and capricious and rejected the triggered contingency measure that achieves much less than one year's worth of emission reductions. Most importantly, the 9th Circuit Court said that, in line with the U.S. EPA's longstanding interpretation of what is required of a contingency measure and the purpose it serves, together with *Bahr*, all reductions needed to satisfy the CAA's contingency measure requirements must come from the contingency measure itself and the amount of reductions needed for contingency should not be reduced by the fact of surplus emission reductions from ongoing programs unless the U.S. EPA formally changes its historic stance on the amount of reductions required. The U.S. EPA staff has interpreted *AIR* to mean that triggered contingency measures must achieve the entirety of the required one year's worth of emission reductions on their own. Additionally, surplus emission reductions from ongoing programs cannot reduce the amount of reductions needed for contingency.

In response to *Bahr* and *Sierra Club*, in 2021, U.S. EPA convened a nationwide internal task force to develop guidance to support states in their development of contingency measures and released Draft Guidance on the Preparation of State Implementation Plan Provisions that Address the Nonattainment Area

⁷ *Sierra Club v. Environmental Protection Agency*, (D.C. Cir. 2021) 985 F.3d 1055

⁸ *Association of Irrigated Residents v. U.S. Environmental Protection Agency*, (9th Cir. 2021) 10 F.4th 937

Contingency Measure Requirements for Ozone and Particulate Matter in March 2023 and finalized it in December 2024.⁹ U.S. EPA's new contingency measure guidance introduces key changes affecting the following three aspects of contingency measures: (1) the quantity of emission reductions required to be achieved by contingency measures; (2) the documentation needed to support a claim that there are insufficient contingency measures to achieve the required emission reductions; and (3) the length of time during which emission reductions from contingency measures must be achieved.

South Coast AQMD's Opportunities for Contingency Measures

South Coast AQMD has over 40 years of experience regulating stationary sources, implementing one of the most stringent and comprehensive control programs in the country. Hence, South Coast AQMD's air quality regulations are mature, leading to challenges to identify contingency measures. This difficulty arises from the fact that most feasible measures have already been or will be implemented to meet air quality standards, leaving little to no potential emission reductions in reserve to use as contingency measures. The paucity of available measures is further ~~exacerbated~~ ~~reduced~~ by the need for an economy-wide transition to zero emissions technology to meet the 2015 ozone standard by 2037.

As a local air agency, South Coast AQMD's primary authority is in regulating stationary sources. Of the 49 control measures that South Coast AQMD committed to implement in the 2022 AQMP, 31 target stationary sources. Because these measures are needed for attainment, they cannot be withheld for contingency. However, the bulk of the emissions responsible for ozone nonattainment are from mobile sources, for which CARB and the federal government possess direct regulatory authority. Despite lacking direct regulatory authority in this area, South Coast AQMD has explored reducing mobile source emissions using innovative approaches such as indirect source rules, voluntary Memoranda of Understanding, and incentive measures to maximize much needed emission reductions for attainment.

South Coast AQMD has prepared the South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone ~~NAAQS Standard~~ (South Coast Ozone Contingency SIP Revision) to satisfy contingency measure requirements in CAA Sections 172(c)(9) and 182(c)(9) and comply with applicable case law. While the potential for further emission reductions is limited, South Coast AQMD has introduced ozone contingency measures in three stationary source rules. In addition, CARB has adopted a mobile source contingency measure. These measures are summarized below:

- Rule 445 – Wood-Burning Devices (Amended October 27, 2020), which includes contingency measures to prohibit the use of indoor or outdoor wood-burning devices in the Basin if the daily maximum 8-hour ozone air quality forecast exceeds specified thresholds.

⁹ U.S. EPA, Guidance on the Preparation of State Implementation Plan Provisions that Address the Nonattainment Area Contingency Measure Requirements for Ozone and Particulate Matter. December 3, 2024. Retrieved from: https://www.epa.gov/system/files/documents/2024-12/cmtf-final-guidance-signature-version-11-22-24_clean_0.pdf

- Rule 463 – Organic Liquid Storage (Amended June 7, 2024), which includes a contingency measure that requires more frequent enhanced leak detection and repair of organic liquid storage tanks.
- Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants (Amended November 1, 2024), which contains contingency measures that include more frequent inspections and stricter leak detection thresholds.
- The California Smog Check Contingency Measure (Adopted October 2023) shortens the current exemption period for new vehicles from 8 years to 7 years after the first trigger and to 6 years after the second, aiming to identify additional emissions control equipment failures in previously exempt vehicles. On July 9, 2024, U.S. EPA approved the smog check contingency measure.¹⁰

While these measures reduce VOC and NO_x emissions, they do not achieve the amount of emission reductions recommended by U.S. EPA’s guidance. Therefore, the South Coast Ozone Contingency SIP Revision includes a robust infeasibility justification, demonstrating the scarcity of remaining measures.

Contingency Measures for the 2008 8-hour Ozone Standard

The South Coast Ozone Contingency SIP Revision specifically addresses the 2015 8-hour ozone standard. While the Basin is also in “extreme” nonattainment for the 2008 8-hour ozone standard, the contingency measure requirements applicable for the standard were met as described below.

In 2019, U.S. EPA conditionally approved the Reasonable Further Progress (RFP) contingency measure element for the 2008 ozone standard in the Basin based on a commitment by South Coast AQMD to adopt and submit a contingency measure for incorporation into the SIP within 12 months of the conditional approval.¹¹ To comply with the requirement, South Coast AQMD amended Rule 445 to incorporate ozone contingency measures in October 2020 and subsequently submitted it to U.S. EPA. Although Rule 445 alone satisfied the commitment, South Coast AQMD incorporated additional contingency measures in Rules 463 and 1173 and CARB adopted the California Smog Check Contingency Measure which also applies to the 2008 ozone standard in the Basin.

While the contingency measure analysis in the South Coast Ozone Contingency SIP Revision was developed for the 2015 ozone standard, its findings remain valid if extended to the 2008 ozone standard. This is because any potential contingency measures deemed infeasible for the 2015 standard would also be infeasible for the 2008 standard. Additionally, the RFP milestone years for the 2008 standard overlap with those of the 2015 standard, and its attainment year (2031) is earlier than that of the 2015 standard

¹⁰ U.S. EPA, Air Plan Revisions; California; Vehicle Inspection and Maintenance Contingency Measure, 89 Fed. Reg. 56222 (July 9, 2024). <https://www.federalregister.gov/documents/2024/07/09/2024-14355/air-plan-revisions-california-vehicle-inspection-and-maintenance-contingency-measure>

¹¹ 84 FR 52005

(2037). As a result, the analysis indicates that there are no additional feasible contingency measures for the 2008 ozone standard.

Format of This Document

This document is organized into seven chapters, each addressing a specific topic. Each of the chapters is summarized below.

Chapter 1, “Introduction,” includes background on the 2022 AQMP, U.S. EPA’s guidance, and South Coast AQMD and CARB’s contingency measures.

Chapter 2, “Emissions Inventory,” summarizes the emissions inventory and provides a calculation of the recommended amount of emission reductions from contingency measures per U.S. EPA’s guidance.

Chapter 3, “South Coast AQMD’s Contingency Measures,” provides details on the stationary source contingency measures for the Basin and a comparison of the reductions achieved by the measures to the amount recommended by U.S. EPA.

Chapter 4, “Infeasibility Justification,” demonstrates the scarcity of additional contingency measures for stationary sources.

Chapter 5, “Public Process,” discusses the role of public participation in developing the South Coast Ozone Contingency SIP Revision.

Chapter 6, “California Environmental Quality Act Analysis and Socioeconomic Impact Assessment,” discusses legal requirements related to CEQA and socioeconomic impact assessments.

Chapter 7, “Staff Recommendation,” provides staff’s recommendation to adopt the South Coast Ozone Contingency SIP Revision.

**South Coast Air Basin Contingency Measure SIP Revision
for the 2015 8-Hour Ozone NAAQS Standard**

CHAPTER 2: EMISSIONS INVENTORY

Emissions Inventory

The emissions inventory used in this plan is based on the 2022 AQMP, as it contained the South Coast Air Basin (Basin) attainment demonstration for the 2015 8-hour ozone standard. Major updates to the stationary source emissions were introduced in the 2022 AQMP. The changes in emissions stem from updates in methodologies, socioeconomic factors, activity/consumption/throughput data and recently adopted regulations. For the 2018 base year, area source emissions were estimated using the latest available activity data and emission factors, while point source emissions were reported emissions through the Annual Emission Reporting program.

Emissions from the South Coast Air Basin

Table 2-1 presents the summer planning emissions of VOCs and NO_x for the Basin by Major Source Category (MSC) in 2018, the base year of the 2022 AQMP. Stationary sources contribute over half of the Basin total VOC emissions, with consumer products being the largest source category. On-road mobile sources contribute 20 percent of the VOC emissions, with passenger cars being the largest category contributing 7.4 percent of total VOC emissions in the Basin. Off-road mobile sources contribute to the remaining VOC emissions, with off-road equipment being the largest source. In contrast, NO_x emissions are dominated by mobile sources. Stationary sources only contribute 15 percent of the total NO_x emissions. The largest contributors to NO_x from stationary sources are fuel combustion in residential and commercial buildings followed by petroleum refining. On-road sources account for 44 percent of the NO_x emissions, with heavy-duty trucks being the largest source with 27 percent of the Basin total NO_x emissions. Off-road sources contribute 41 percent of all NO_x emissions, with off-road equipment being the largest source.

Table 2-2 presents the summer planning emissions of VOCs and NO_x for the Basin by MSC in 2037, the attainment year for the 2015 8-hour ozone standard. This inventory, commonly referred to “baseline” emissions, reflects already adopted rules and regulations but not the reductions from the attainment strategy described in the 2022 AQMP. In comparison to 2018, emissions from on-road sources decline as a result of ongoing on-road vehicle regulations and turnover to cleaner vehicles. Similarly, emissions from off-road equipment also decline due to switching to cleaner equipment. On the other hand, VOC emissions from consumer products are projected to increase due to the increase in population and human activity. NO_x emissions from aircraft and trains are expected to increase due to the increase in economic activity and lack of newer and more stringent regulatory actions compared to stationary and other mobile source categories. As in 2018, stationary sources constitute the largest fraction of VOC emissions, with emissions from consumer products being the largest source. The relative contribution of on-road mobile sources to VOCs decreases, particularly from light and medium duty vehicle classes. The relative contribution of off-road sources to VOC emissions also decreases with respect to 2018, due to decreasing emissions from off-road equipment. In 2037, NO_x emissions from mobile sources continue to be the largest contributor to total NO_x in the Basin, despite the large reductions projected from on-road vehicles. NO_x emissions from

stationary sources are projected to decrease, although their relative contribution to total NO_x emissions increases to 22 percent. This is because of substantial emission reductions in on-road mobile sources, which decrease their relative contribution from 44 percent to 20 percent of the Basin total. Still, heavy-duty trucks are the largest source of NO_x emissions in on-road vehicles. Off-road sources emit most of the NO_x in 2037, with ships and aircraft becoming the largest emission sources in the Basin, contributing 32 percent of all NO_x emissions.

The emissions are presented by MSC for brevity, however the infeasibility justification presented in Chapter 4 was conducted at the Emissions Inventory Code (EIC) level, identifying further details such as fuel, equipment, and process type in each MSC.

**TABLE 2-1
SUMMER PLANNING EMISSIONS FOR THE BASIN BY MAJOR SOURCE CATEGORY IN 2018**

| MSC | Description | VOC (tpd) | % VOC | NOx (tpd) | % NOx |
|-----|--|-----------|-------|-----------|-------|
| 10 | Electric Utilities | 0.33 | 0.08 | 2.13 | 0.61 |
| 20 | Cogeneration | 0.02 | 0.00 | 0.03 | 0.01 |
| 30 | Oil and Gas Production (combustion) | 0.12 | 0.03 | 1.29 | 0.37 |
| 40 | Petroleum Refining (Combustion) | 1.38 | 0.34 | 10.27 | 2.93 |
| 50 | Manufacturing and Industrial | 0.95 | 0.23 | 10.01 | 2.85 |
| 52 | Food and Agricultural Processing | 0.05 | 0.01 | 0.42 | 0.12 |
| 60 | Service and Commercial | 1.89 | 0.47 | 9.37 | 2.67 |
| 99 | Other (Fuel Combustion) | 0.68 | 0.17 | 3.17 | 0.90 |
| 110 | Sewage Treatment | 0.28 | 0.07 | 0.00 | 0.00 |
| 120 | Landfills | 8.64 | 2.13 | 0.48 | 0.14 |
| 130 | Incineration | 0.04 | 0.01 | 1.22 | 0.35 |
| 140 | Soil Remediation | 0.00 | 0.00 | 0.00 | 0.00 |
| 199 | Other (Waste Disposal) | 7.67 | 1.89 | 0.01 | 0.00 |
| 210 | Laundering | 0.17 | 0.04 | 0.00 | 0.00 |
| 220 | Degreasing | 12.98 | 3.20 | 0.00 | 0.00 |
| 230 | Coatings and Related Processes | 18.43 | 4.54 | 0.00 | 0.00 |
| 240 | Printing | 0.75 | 0.18 | 0.00 | 0.00 |
| 250 | Adhesives and Sealants | 5.14 | 1.27 | 0.00 | 0.00 |
| 299 | Other (Cleaning and Surface Coatings) | 0.63 | 0.16 | 0.05 | 0.01 |
| 310 | Oil and Gas Production | 2.35 | 0.58 | 0.01 | 0.00 |
| 320 | Petroleum Refining | 4.44 | 1.09 | 0.92 | 0.26 |
| 330 | Petroleum Marketing | 13.78 | 3.39 | 0.05 | 0.01 |
| 399 | Other (Petroleum Production and Marketing) | 0.04 | 0.01 | 0.01 | 0.00 |
| 410 | Chemical | 4.45 | 1.10 | 0.09 | 0.03 |
| 420 | Food and Agriculture | 0.52 | 0.13 | 0.01 | 0.00 |
| 430 | Mineral Processes | 0.40 | 0.10 | 0.23 | 0.07 |
| 440 | Metal Processes | 0.10 | 0.02 | 0.34 | 0.10 |
| 450 | Wood and Paper | 0.24 | 0.06 | 0.00 | 0.00 |
| 460 | Glass and Related Products | 0.00 | 0.00 | 0.00 | 0.00 |
| 470 | Electronics | 0.01 | 0.00 | 0.00 | 0.00 |
| 499 | Other (Industrial Processes) | 5.07 | 1.25 | 0.01 | 0.00 |
| 510 | Consumer Products | 107.38 | 26.45 | 0.00 | 0.00 |
| 520 | Architectural Coatings and Related Solvent | 10.62 | 2.62 | 0.00 | 0.00 |
| 530 | Pesticides/Fertilizers | 1.12 | 0.28 | 0.00 | 0.00 |
| 540 | Asphalt Paving/Roofing | 1.20 | 0.30 | 0.00 | 0.00 |

| MSC | Description | VOC (tpd) | % VOC | NOx (tpd) | % NOx |
|-----|---------------------------------------|-----------|-------|-----------|-------|
| 610 | Residential Fuel Combustion | 2.25 | 0.55 | 11.35 | 3.24 |
| 620 | Farming Operations | 1.86 | 0.46 | 0.00 | 0.00 |
| 630 | Construction and Demolition | 0.00 | 0.00 | 0.00 | 0.00 |
| 640 | Paved Road Dust | 0.00 | 0.00 | 0.00 | 0.00 |
| 645 | Unpaved Road Dust | 0.00 | 0.00 | 0.00 | 0.00 |
| 650 | Fugitive Windblown Dust | 0.00 | 0.00 | 0.00 | 0.00 |
| 660 | Fires | 0.29 | 0.07 | 0.08 | 0.02 |
| 670 | Waste Burning and Disposal | 0.21 | 0.05 | 0.05 | 0.01 |
| 690 | Cooking | 1.08 | 0.27 | 0.00 | 0.00 |
| 699 | Other (Miscellaneous Processes | 0.00 | 0.00 | 0.00 | 0.00 |
| 710 | Light Duty Passenger Auto (LDA) | 29.85 | 7.35 | 20.88 | 5.95 |
| 722 | Light Duty Trucks 1 (T1) | 7.82 | 1.93 | 5.25 | 1.50 |
| 723 | Light Duty Trucks 2 (T2) | 14.68 | 3.62 | 13.63 | 3.89 |
| 724 | Medium Duty Trucks (T3) | 12.92 | 3.18 | 12.38 | 3.53 |
| 732 | Light Heavy Duty Gas Trucks 1 (T4) | 2.50 | 0.62 | 2.12 | 0.60 |
| 733 | Light Heavy Duty Gas Trucks 2 (T5) | 0.37 | 0.09 | 0.33 | 0.09 |
| 734 | Medium Heavy Duty Gas Trucks (T6) | 0.50 | 0.12 | 0.89 | 0.25 |
| 736 | Heavy Heavy Duty Gas Trucks (HHD) | 0.01 | 0.00 | 0.05 | 0.01 |
| 742 | Light Heavy Duty Diesel Trucks 1 (T4) | 0.26 | 0.06 | 7.61 | 2.17 |
| 743 | Light Heavy Duty Diesel Trucks 2 (T5) | 0.09 | 0.02 | 2.52 | 0.72 |
| 744 | Medium Heavy Duty Diesel Truck (T6) | 1.14 | 0.28 | 22.99 | 6.55 |
| 746 | Heavy Heavy Duty Diesel Trucks (HHD) | 2.32 | 0.57 | 58.41 | 16.65 |
| 750 | Motorcycles (MCY) | 8.17 | 2.01 | 1.90 | 0.54 |
| 760 | Diesel Urban Buses (UB) | 0.24 | 0.06 | 1.99 | 0.57 |
| 762 | Gas Urban Buses (UB) | 0.01 | 0.00 | 0.03 | 0.01 |
| 771 | Gas School Buses (SB) | 0.04 | 0.01 | 0.05 | 0.01 |
| 772 | Diesel School Buses (SB) | 0.03 | 0.01 | 2.14 | 0.61 |
| 777 | Gas Other Buses (OB) | 0.10 | 0.02 | 0.23 | 0.07 |
| 778 | Motor Coaches | 0.05 | 0.01 | 0.85 | 0.24 |
| 779 | Diesel Other Buses (OB) | 0.06 | 0.01 | 0.90 | 0.26 |
| 780 | Motor Homes (MH) | 0.08 | 0.02 | 0.71 | 0.20 |
| 810 | Aircraft | 3.53 | 0.87 | 17.16 | 4.89 |
| 820 | Trains | 0.69 | 0.17 | 15.10 | 4.30 |
| 833 | Ocean Going Vessels | 9.36 | 2.31 | 32.21 | 9.18 |
| 835 | Commercial Harbor Crafts | 0.33 | 0.08 | 5.86 | 1.67 |
| 840 | Recreational Boats | 22.49 | 5.54 | 3.86 | 1.10 |
| 850 | Off-Road Recreational Vehicles | 1.62 | 0.40 | 0.03 | 0.01 |
| 860 | Off-Road Equipment | 59.50 | 14.66 | 59.48 | 16.96 |
| 861 | Off-Road Equipment (PERP) | 0.76 | 0.19 | 8.83 | 2.52 |
| 870 | Farm Equipment | 0.41 | 0.10 | 0.81 | 0.23 |
| 890 | Fuel Storage and Handling | 8.48 | 2.09 | 0.00 | 0.00 |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| MSC | Description | VOC (tpd) | % VOC | NOx (tpd) | % NOx |
|-----|--|---------------|---------------|---------------|---------------|
| | Total Stationary Point and Area Sources | 217.56 | 53.59 | 51.59 | 14.71 |
| | Total On-Road Vehicles | 81.22 | 20.01 | 155.85 | 44.43 |
| | Total Other Mobile | 107.16 | 26.40 | 143.35 | 40.87 |
| | Total | 405.94 | 100.00 | 350.78 | 100.00 |

**TABLE 2-2
SUMMER PLANNING EMISSIONS FOR THE BASIN BY MAJOR SOURCE CATEGORY IN 2037**

| MSC | Description | VOC (tpd) | % VOC | NOx (tpd) | % NOx |
|-----|--|--------------|-------|--------------|-------|
| 10 | Electric Utilities | 0.27 | 0.08 | 2.56 | 1.39 |
| 20 | Cogeneration | 0.02 | 0.01 | 0.02 | 0.01 |
| 30 | Oil and Gas Production (combustion) | 0.19 | 0.06 | 0.97 | 0.53 |
| 40 | Petroleum Refining (Combustion) | 1.38 | 0.41 | 3.90 | 2.11 |
| 50 | Manufacturing and Industrial | 0.93 | 0.27 | 7.85 | 4.26 |
| 52 | Food and Agricultural Processing | 0.05 | 0.01 | 0.40 | 0.22 |
| 60 | Service and Commercial | 2.04 | 0.60 | 9.98 | 5.41 |
| 99 | Other (Fuel Combustion) | 0.69 | 0.20 | 2.68 | 1.45 |
| 110 | Sewage Treatment | 0.31 | 0.09 | 0.00 | 0.00 |
| 120 | Landfills | 9.73 | 2.87 | 0.42 | 0.23 |
| 130 | Incineration | 0.04 | 0.01 | 1.25 | 0.68 |
| 140 | Soil Remediation | 0.00 | 0.00 | 0.00 | 0.00 |
| 199 | Other (Waste Disposal) | 8.14 | 2.40 | 0.01 | 0.01 |
| 210 | Laundering | 0.19 | 0.06 | 0.00 | 0.00 |
| 220 | Degreasing | 13.51 | 3.99 | 0.00 | 0.00 |
| 230 | Coatings and Related Processes | 20.78 | 6.14 | 0.00 | 0.00 |
| 240 | Printing | 0.89 | 0.26 | 0.00 | 0.00 |
| 250 | Adhesives and Sealants | 4.62 | 1.36 | 0.00 | 0.00 |
| 299 | Other (Cleaning and Surface Coatings) | 0.65 | 0.19 | 0.04 | 0.02 |
| 310 | Oil and Gas Production | 4.47 | 1.32 | 0.01 | 0.01 |
| 320 | Petroleum Refining | 4.44 | 1.31 | 0.55 | 0.30 |
| 330 | Petroleum Marketing | 11.11 | 3.28 | 0.02 | 0.01 |
| 399 | Other (Petroleum Production and Marketing) | 0.04 | 0.01 | 0.01 | 0.01 |
| 410 | Chemical | 4.57 | 1.35 | 0.07 | 0.04 |
| 420 | Food and Agriculture | 0.58 | 0.17 | 0.03 | 0.02 |
| 430 | Mineral Processes | 0.45 | 0.13 | 0.47 | 0.25 |
| 440 | Metal Processes | 0.12 | 0.04 | 0.34 | 0.18 |
| 450 | Wood and Paper | 0.26 | 0.08 | 0.00 | 0.00 |
| 460 | Glass and Related Products | 0.00 | 0.00 | 0.00 | 0.00 |
| 470 | Electronics | 0.02 | 0.01 | 0.00 | 0.00 |
| 499 | Other (Industrial Processes) | 5.37 | 1.59 | 0.03 | 0.02 |
| 510 | Consumer Products | 132.42 | 39.10 | 0.00 | 0.00 |
| 520 | Architectural Coatings and Related Solvent | 12.44 | 3.67 | 0.00 | 0.00 |
| 530 | Pesticides/Fertilizers | 1.20 | 0.35 | 0.00 | 0.00 |
| 540 | Asphalt Paving/Roofing | 1.41 | 0.42 | 0.00 | 0.00 |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| MSC | Description | VOC (tpd) | % VOC | NOx (tpd) | % NOx |
|-----|---------------------------------------|-----------|-------|-----------|-------|
| 610 | Residential Fuel Combustion | 2.23 | 0.66 | 9.51 | 5.16 |
| 620 | Farming Operations | 1.30 | 0.38 | 0.00 | 0.00 |
| 630 | Construction and Demolition | 0.00 | 0.00 | 0.00 | 0.00 |
| 640 | Paved Road Dust | 0.00 | 0.00 | 0.00 | 0.00 |
| 645 | Unpaved Road Dust | 0.00 | 0.00 | 0.00 | 0.00 |
| 650 | Fugitive Windblown Dust | 0.00 | 0.00 | 0.00 | 0.00 |
| 660 | Fires | 0.29 | 0.09 | 0.08 | 0.04 |
| 670 | Waste Burning and Disposal | 0.22 | 0.06 | 0.10 | 0.05 |
| 690 | Cooking | 1.21 | 0.36 | 0.00 | 0.00 |
| 699 | Other (Miscellaneous Processes) | 0.00 | 0.00 | 0.00 | 0.00 |
| 710 | Light Duty Passenger Auto (LDA) | 11.31 | 3.34 | 6.92 | 3.75 |
| 722 | Light Duty Trucks 1 (T1) | 2.19 | 0.65 | 1.05 | 0.57 |
| 723 | Light Duty Trucks 2 (T2) | 6.21 | 1.83 | 3.02 | 1.64 |
| 724 | Medium Duty Trucks (T3) | 4.93 | 1.46 | 2.13 | 1.15 |
| 732 | Light Heavy Duty Gas Trucks 1 (T4) | 0.51 | 0.15 | 0.42 | 0.23 |
| 733 | Light Heavy Duty Gas Trucks 2 (T5) | 0.08 | 0.02 | 0.08 | 0.04 |
| 734 | Medium Heavy Duty Gas Trucks (T6) | 0.21 | 0.06 | 0.14 | 0.08 |
| 736 | Heavy Heavy Duty Gas Trucks (HHD) | 0.00 | 0.00 | 0.02 | 0.01 |
| 742 | Light Heavy Duty Diesel Trucks 1 (T4) | 0.10 | 0.03 | 0.58 | 0.31 |
| 743 | Light Heavy Duty Diesel Trucks 2 (T5) | 0.04 | 0.01 | 0.28 | 0.15 |
| 744 | Medium Heavy Duty Diesel Truck (T6) | 0.06 | 0.02 | 4.46 | 2.42 |
| 746 | Heavy Heavy Duty Diesel Trucks (HHD) | 0.86 | 1.16 | 13.69 | 15.14 |
| 750 | Motorcycles (MCY) | 9.19 | 0.18 | 2.16 | 8.40 |
| 760 | Diesel Urban Buses (UB) | 0.02 | 2.94 | 0.11 | 16.62 |
| 762 | Gas Urban Buses (UB) | 0.00 | 0.08 | 0.01 | 2.95 |
| 771 | Gas School Buses (SB) | 0.07 | 3.18 | 0.03 | 1.82 |
| 772 | Diesel School Buses (SB) | 0.01 | 0.23 | 0.68 | 0.02 |
| 777 | Gas Other Buses (OB) | 0.07 | 6.27 | 0.05 | 10.75 |
| 778 | Motor Coaches | 0.01 | 0.16 | 0.12 | 1.86 |
| 779 | Diesel Other Buses (OB) | 0.00 | 0.03 | 0.36 | 0.15 |
| 780 | Motor Homes (MH) | 0.02 | 1.77 | 0.37 | 0.00 |
| 810 | Aircraft | 3.93 | 1.16 | 27.93 | 15.14 |
| 820 | Trains | 0.61 | 0.18 | 15.50 | 8.40 |
| 833 | Ocean Going Vessels | 9.97 | 2.94 | 30.65 | 16.62 |
| 835 | Commercial Harbor Crafts | 0.28 | 0.08 | 5.45 | 2.95 |
| 840 | Recreational Boats | 10.76 | 3.18 | 3.35 | 1.82 |
| 850 | Off-Road Recreational Vehicles | 0.77 | 0.23 | 0.04 | 0.02 |
| 860 | Off-Road Equipment | 21.24 | 6.27 | 19.83 | 10.75 |
| 861 | Off-Road Equipment (PERP) | 0.54 | 0.16 | 3.43 | 1.86 |
| 870 | Farm Equipment | 0.11 | 0.03 | 0.28 | 0.15 |
| 890 | Fuel Storage and Handling | 6.00 | 1.77 | 0.00 | 0.00 |

| MSC | Description | VOC (tpd) | % VOC | NOx (tpd) | % NOx |
|-----|--|---------------|---------------|---------------|---------------|
| | Total Stationary Point and Area Sources | 248.58 | 73.40 | 41.31 | 22.40 |
| | Total On-Road Vehicles | 35.88 | 10.59 | 36.69 | 19.89 |
| | Total Other Mobile | 54.22 | 16.01 | 106.46 | 57.71 |
| | Total | 338.68 | 100.00 | 184.46 | 100.00 |

One Year’s Worth of Progress for NOx and VOC

Table 2-3 summarizes One Year’s Worth (OYW) of progress for NOx and VOC. The calculation considers the Basin’s emissions inventory (EI) for the 2018 base year and the 2037 attainment year and the number of years between the base and attainment years, as shown below:

$$OYW \text{ of progress} = \frac{(base \text{ year EI} - attainment \text{ year EI})}{(attainment \text{ year} - base \text{ year})} \div base \text{ year EI} \times attainment \text{ year EI}$$

The 2037 attainment year EI differs from the baseline emissions presented in Table 2-2 as it reflects implementation of the 2022 AQMP control strategy. Consistent with U.S. EPA’s guidance, OYW of NOx and VOC reductions are calculated to be 2.63 tpd and 3.52 tpd, respectively. Chapter 3 presents a comparison of the reductions achieved by South Coast AQMD’s contingency measures with OYW of progress.

**TABLE 2-3
ONE YEAR’S WORTH OF NOX AND VOC EMISSION REDUCTIONS FOR THE SOUTH COAST AIR BASIN
(TONS PER DAY)**

| Emission Inventory | NOx (tpd) | VOC (tpd) |
|-------------------------|-----------|-----------|
| 2018 Base Year EI | 350.78 | 405.94 |
| 2037 Attainment Year EI | 60.21 | 321.34 |
| OYW of Progress | 2.63 | 3.52 |

**South Coast Air Basin Contingency Measure SIP Revision
for the 2015 8-Hour Ozone NAAQS Standard**

**CHAPTER 3: SOUTH COAST AQMD'S
CONTINGENCY MEASURES**

Contingency Measure Identification and Analysis

South Coast AQMD followed the procedures outlined in the U.S. EPA's guidance for the preparation of a contingency measure SIP revision. These procedures, which involve the identification of existing and potential controls and evaluation of the feasibility of such controls, are outlined below:

1. Thoroughly examine the emission sources in the Basin and identify applicable rules.
2. Compare existing rule requirements with those in other jurisdictions and identify potential control measures.
3. Review each of the measures identified in Step 2 to determine whether it is feasible to implement within up to two years of a contingency measure qualifying event. If feasible, include the measure in the contingency measure submission.
4. For the remaining infeasible measures from Step 3, document the reason why each measure is infeasible as a contingency measure, including whether the conclusion is based on technological, economic, or other infeasibility considerations. This evaluation is provided in the next chapter.

During the first step in the analysis, examination of the emission sources in the Basin led to the identification of ozone contingency measures in three of South Coast AQMD's rules: Rule 445 – Wood-Burning Devices, Rule 463 – Organic Liquid Storage, and Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants. Contingency measures have already been incorporated into these rules, which contain automatic triggering mechanisms to ensure that the contingency measures would become effective upon a U.S. EPA finding of a failure to either attain an ozone standard or comply with Reasonable Further Progress (RFP) requirements. A summary of each rule's requirements and contingency measures is presented below.

Rule 445

Rule 445 – Wood-Burning Devices reduces emissions from wood-burning devices such as fireplaces or wood stoves. It was originally adopted in 2008 to implement control measure BCM-03 – Emission Reductions from Wood Burning Fireplaces and Wood Stoves in the 2007 AQMP. The rule contains requirements regarding the sale and installation of wood-burning devices, prohibits the burning or sale of unseasoned wood, and includes curtailment of wood-burning on “No-Burn” days when the ambient concentration of PM_{2.5} is forecast to exceed the curtailment threshold.

In June 2020, Rule 445 was amended to incorporate PM_{2.5} contingency measures. The rule was subsequently amended in October 2020 to add ozone contingency measures.¹² If triggered, the ozone contingency measure will extend the wood-burning season from September 1 through April 30 and require wood-burning curtailment on days when the ambient daily maximum 8-hour average ozone is forecast to exceed 80 ppb. If triggered a second time, the forecast threshold would be reduced to 75 ppb

¹² South Coast AQMD, Final Staff Report for Proposed Amended Rule 445 – Wood-Burning Devices, October 27, 2020. <https://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2020/2020-oct27-001.pdf?sfvrsn=2>

and, upon a third triggering, to 70 ppb. Each contingency measure would increase the number of “No-Burn” days, thereby reducing VOC emissions. Table 3-1 presents the VOC reductions that would result from each ozone contingency measure triggered. These reductions were estimated in 2020 as part of the rule amendment.¹³

**TABLE 3-1
VOC REDUCTIONS (TONS PER YEAR) BY RULE 445 OZONE CURTAILMENT THRESHOLD IN THE SOUTH COAST AIR BASIN**

| Contingency | Upon Triggering 1 st Contingency Measure | Upon Triggering 2 nd Contingency Measure | Upon Triggering 3 rd Contingency Measure |
|--------------------|---|---|---|
| Forecast Threshold | 80 ppb | 75 ppb | 70 ppb |
| VOC Reductions | 22.38 | 46.10 | 88.43 |

Rule 463

Rule 463 – Organic Liquid Storage reduces VOC emissions from tanks that store organic liquids. It applies to above-ground stationary tanks with a capacity of 75,000 liters (19,815 gallons) or more used to store organic liquids, above-ground tanks with a capacity between 950 liters (251 gallons) and 75,000 liters (19,815 gallons) that are used to store gasoline, and any stationary tank with a potential for VOC emissions of 6 tons per year or greater used in crude oil and natural gas production operations. Rule 463 requires applicable tanks to install controls based on tank type (e.g., fixed roof, internal floating roof, and external floating roof) and partially implements the following control measures from previous AQMPs:

- FUG-03 – Further Reductions of Fugitive VOC Emissions in the 2012 AQMP
- FUG-01 – Improved Leak Detection and Repair in the 2016 AQMP
- FUG-01 – Improved Leak Detection and Repair in the 2022 AQMP

These control measures focus on enhanced Leak Detection and Repair (LDAR) through advanced technologies, including optical gas imaging (OGI), as a method to reduce emissions from leaks.

In June 2024, Rule 463 was amended to include an ozone contingency measure for the 2008 and 2015 8-hour ozone standards. If triggered, the contingency measure would increase OGI inspection frequencies of storage tanks that contain organic liquids with a True Vapor Pressure of 5.0 pounds per square inch. Triggering the contingency measure in the South Coast Air Basin would result in an estimated additional 2,038 pounds per year of VOC reductions.¹⁴

¹³ Ibid.

¹⁴ South Coast AQMD, Final Staff Report for Proposed Amended Rule 463 – Organic Liquid Storage, June 2024. <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2024/2024-Jun7-025.pdf?sfvrsn=6>

Rule 1173

Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants controls VOC leaks from components and releases from atmospheric process pressure relief devices. This rule applies to refineries, chemical plants, lubricating oil and grease re-refiners, marine terminals, oil and gas production fields, natural gas processing plants, and pipeline transfer stations. Rule 1173 was amended in November 2024 to implement the Wilmington, Carson, West Long Beach Community Emission Reductions Plan and the 2022 AQMP Control Measure FUG-01: Improved Leak Detection and Repair.

The November 2024 rule amendment also included three ozone contingency measures for the 2008 and 2015 8-hour ozone standards.¹⁵ The contingency measures would be implemented sequentially. If triggered, the first contingency measure would reduce the leak threshold of pumps from 400 ppm to 300 ppm. The second contingency measure would increase the frequency of OGI inspections from monthly to every two calendar weeks. Triggering the third contingency measure would reduce the leak threshold for valves, fittings, and other devices from 100 ppm to 50 ppm. If all triggered, these three contingency measures are expected to further reduce VOC emissions by 217.9 tons per year or 0.60 tons per day. Table 3-2 summarizes the VOC reductions that would result from each contingency measure triggered under Rule 1173.¹⁶

**TABLE 3-2
VOC REDUCTIONS (TONS PER YEAR) BY RULE 1173 TRIGGER MECHANISM IN THE SOUTH COAST AIR
BASIN**

| Contingency | Upon Triggering 1 st Contingency Measure | Upon Triggering 2 nd Contingency Measure | Upon Triggering 3 rd Contingency Measure |
|----------------|---|---|---|
| VOC Reductions | 8.7 | 42.8 | 166.4 |

¹⁵ South Coast AQMD, Final Staff Report for Proposed Amended Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants, November 2024.

<https://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2024/2024-Nov1-022.pdf?sfvrsn=6>

¹⁶ Ibid.

Comparison to OYW of Reductions

Table 2-3 in Chapter 2 presents One Year's Worth (OYW) of reductions, which are 2.63 tpd and 3.52 tpd, respectively, for NO_x and VOC. Table 3-3 below shows the cumulative NO_x and VOC reductions for triggering the first, second, and third contingency measures within each rule or measure. The reductions from CARB's smog check contingency measure, described in detail in Appendix A: California Smog Check Contingency Measure State Implementation Plan Revision, are listed as well.

**TABLE 3-3
REDUCTIONS FROM CONTINGENCY MEASURES IN THE SOUTH COAST AIR BASIN**

| | 1 st Contingency Measure | | 2 nd Contingency Measure | | 3 rd Contingency Measure | |
|---|-------------------------------------|----------------------------------|-------------------------------------|----------------------------------|-------------------------------------|----------------------------------|
| | VOC reductions (tpd) | NO _x reductions (tpd) | VOC reductions (tpd) | NO _x reductions (tpd) | VOC reductions (tpd) | NO _x reductions (tpd) |
| Rule 445 | 0.06 | - | 0.13 | - | 0.24 | - |
| Rule 463 | <0.01 | - | - | - | - | - |
| Rule 1173 | 0.02 | - | 0.12 | - | 0.46 | - |
| California Smog Check Contingency Measure | 0.08 | 0.25 | 0.08* | 0.25* | - | - |
| Total Reductions | 0.16 | 0.25 | 0.33 | 0.25 | 0.70 | 0.00 |

*CARB did not explicitly quantify reductions associated with triggering the 2nd contingency measure, but they are expected to be similar to the reductions associated with the 1st contingency measure.

South Coast AQMD and CARB's contingency measures achieve VOC and NO_x reductions that are surplus to the attainment strategy, although they do not achieve OYW of VOC or NO_x reductions. Therefore, pursuant to U.S. EPA's guidance, Chapter 4 presents the infeasibility justification that no further opportunity for contingency measures exists in the South Coast Air Basin.

**South Coast Air Basin Contingency Measure SIP Revision
for the 2015 8-Hour Ozone NAAQS Standard**

CHAPTER 4: INFEASIBILITY JUSTIFICATION

Reasoned Justification for Contingency Measures Achieving Less than One Year's Worth of Progress

This chapter contains evaluation of all VOC and NO_x stationary source categories in the South Coast Air Basin (Basin) and associated control measures. Tables 2-1 and 2-2 in Chapter 2 list the 2018 and 2037 summer planning emissions of VOC and NO_x, respectively, reported in tons per day (tpd) and as percentages of the Basin total inventory by Major Source Category (MSC). However, the evaluation presented in this chapter focused on all stationary sources at the Emissions Inventory Code (EIC) level. The EIC level inventory identifies further details such as fuel, equipment, and process type in each MSC.

As shown in Table 2-2, mobile source categories (i.e., MSCs 710 through 890) comprise nearly 80 percent of the 2037 summer planning NO_x emissions in the Basin. While CARB has unique authority to regulate certain mobile sources by obtaining a waiver from U.S. EPA, significant mobile source categories such as aircraft, ships, locomotives, and inter-state trucks lie under primarily federal regulatory authority. It is important to note that U.S. EPA is not obligated to evaluate contingency measures for sources under its authority even though these emission sources account for 85 tpd of NO_x in 2037, exceeding the maximum allowable NO_x emissions needed to meet the 2015 8-hour ozone standard. Furthermore, the dominance of mobile source NO_x emissions significantly limits the ability for South Coast AQMD to achieve the recommended amount of emission reductions from contingency measures specified in U.S. EPA's guidance.¹⁷

The following sections evaluate potential measures by source category and demonstrate that all feasible opportunities for contingency measures, beyond those already committed for the 2015 8-hour ozone standard, have been exhausted. As part of this evaluation, control measures implemented by other jurisdictions are reviewed and compared with the applicable rules adopted by South Coast AQMD. If the evaluation reveals an area where South Coast AQMD's rules are less stringent than those of other jurisdictions, a potential contingency measure is identified and subjected to further analysis to assess feasibility. This evaluation included control measures adopted by December 2024.

Fuel Combustion

Fuel combustion emissions are shown in Table 4-1 and consist of nine MSCs including 010 – Electric Utilities, 020 – Cogeneration, 030 – Oil and Gas Production (Combustion), 040 – Petroleum Refining (Combustion), 050 – Manufacturing and Industrial, 052 – Food and Agricultural Processing, 060 – Service and Commercial, 099 – Other (Fuel Combustion), and 610 – Residential Fuel Combustion. Staff examined VOC and NO_x emissions by equipment category rather than source category because the analysis of feasible contingency measures is anticipated to be similar across each combustion source category. That

¹⁷ U.S. EPA, *Guidance on the Preparation of State Implementation Plan Provisions that Address the Nonattainment Area Contingency Measure Requirements for Ozone and Particulate Matter*. December 3, 2024.

https://www.epa.gov/system/files/documents/2024-12/cmtf-final-guidance-signature-version-11-22-24_clean_0.pdf

is, the technologies available to minimize emissions from fuel combustion in each source category are predicted to be more dependent on the equipment combusting fuel than on the type of source generating the emissions.

As demonstrated in Table 4-1, fuel combustion sources account for 6.40 tpd of VOC and 37.78 tpd of NO_x in the 2037 baseline emissions inventory. The analysis of fuel combustion equipment was grouped into five categories: (1) boilers, steam generators, and process heaters; (2) engines; (3) combustion turbines; (4) residential and commercial fuel combustion; and (5) other fuel combustion. Each source group is analyzed below.

**TABLE 4-1
FUEL COMBUSTION SOURCE CATEGORY EMISSIONS BASED ON 2037 SUMMER PLANNING
INVENTORY**

| Industry | VOC (tpd) | NO _x (tpd) |
|---|-------------|-----------------------|
| 010 – Electric Utilities | 0.27 | 2.57 |
| 020 – Cogeneration | 0.01 | 0.02 |
| 030 – Oil and Gas Production (Combustion) | 0.19 | 0.97 |
| 040 – Petroleum Refining (Combustion) | 1.38 | 3.90 |
| 050 – Manufacturing and Industrial | 0.93 | 7.87 |
| 052 – Food and Agricultural Processing | 0.05 | 0.40 |
| 060 – Service and Commercial | 2.04 | 10.00 |
| 099 – Other (Fuel Combustion) | 0.69 | 2.66 |
| 610 – Residential Fuel Combustion | 0.84 | 9.39 |
| Total | 6.40 | 37.78 |

1. *Boilers, Steam Generators, and Process Heaters*

a. Overview

Boilers, steam generators, and process heaters are used to produce hot water, produce steam, and transfer heat from combustion to liquid or process streams. These units emit VOC and NO_x from fuel combustion and can be found at facilities representing a wide range of industries including, but not limited to, electrical utilities, cogeneration, oil and gas production, petroleum refining, manufacturing and industrial, food and agricultural processing, and service and commercial facilities as shown in Table 4-2. These units have significant variability in technology, size, use and age of equipment, as well as variability in potential controls for various pollutants, the affected industries, and the regulatory requirements.

**TABLE 4-2
BOILERS, STEAM GENERATORS, AND PROCESS HEATERS EMISSIONS BASED ON 2037 SUMMER
PLANNING INVENTORY**

| Industry | VOC (tpd) | NOx (tpd) |
|---|-------------|-------------|
| 010 – Electric Utilities | 0.06 | 0.48 |
| 020 – Cogeneration | 0.00 | 0.00 |
| 030 – Oil and Gas Production (Combustion) | 0.04 | 0.08 |
| 040 – Petroleum Refining (Combustion) | 0.82 | 3.35 |
| 050 – Manufacturing and Industrial | 0.18 | 1.26 |
| 052 – Food and Agricultural Processing | 0.04 | 0.31 |
| 060 – Service and Commercial | 0.13 | 1.04 |
| 099 – Other (Fuel Combustion) | 0.00 | 0.00 |
| 610 – Residential Fuel Combustion | 0.00 | 0.00 |
| Total¹ | 1.26 | 6.52 |

¹Values may not sum due to rounding.

b. Evaluation

i. Available Control Technologies

Low NOx burners (LNB) and ultra-low NOx burners (ULNB), as well as flue gas recirculation (FGR), are commonly used combustion control technologies that manage NOx emissions in boilers, steam generators, and process heaters. The most popular post-combustion add-on control method is selective catalytic reduction (SCR). With ULNB, emission limitations of 7 to 9 parts per million (ppm)¹⁸ are often feasible to achieve. Current units burning gaseous fuels can achieve a 9 ppm NOx limit with ULNB and meeting 7 ppm is potentially possible with burner replacements.¹⁹ Operators often utilize SCR to attain an emissions limit of 5 ppm or below. There are emerging technologies that have demonstrated achieving 5 ppm and lower without the use of SCR and these include ULNB for boilers smaller than 20 million British thermal units per hour (MMBtu/hr).²⁰

ii. South Coast AQMD Control Measures

Table 4-3 summarizes South Coast AQMD control measures for boilers, steam generators, and process heaters.

¹⁸ All ppm emission limits are referenced at 3 percent volume stack gas oxygen (O₂) on a dry basis averaged over a period of 15 consecutive minutes.

¹⁹ South Coast AQMD, Final Staff Report for PARs 1146, 1146.1 and 1146.2, and PR 1100, December 2018.

<https://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2018/2018-dec7-028.pdf?sfvrsn=6>

²⁰ John Zink Hamworthy SOLEX™ Burner: <https://www.johnzinkhamworthy.com/wp-content/uploads/solex-burner.pdf>. Accessed on September 27, 2023.

**TABLE 4-3
SOUTH COAST AQMD CONTROL MEASURES (BOILERS, STEAM GENERATORS, AND PROCESS HEATERS)**

| South Coast AQMD Rule | Applicability | Control Measure |
|---|---|---|
| Rule 1135 – Emissions of Oxides of Nitrogen from Electricity Generating Facilities (Amended 10/4/24) | Electric generating units at electricity generating facilities. | Boilers must achieve 5 ppm NOx at 3% O ₂ . |
| Rule 1146 – Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters (Amended 12/4/20) | Boilers, steam generators, and process heaters of equal to or greater than 5 MMBtu/hr rated input capacity used in all industrial, institutional, and commercial operations | The various limits in the rule apply to different types of units based on use and size but can be achieved using the following control technologies: LNB, ULNB, SCR |
| Rule 1146.1 – Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters (Amended 12/7/18) | Boilers, steam generators, and process heaters that are greater than 2 MMBtu/hr and less than 5 MMBtu/hr rated heat input capacity used in any industrial, institutional, or commercial operation | The various limits in the rule apply to different types of units based on use and size but can be achieved using the following control technologies: LNB, ULNB |
| Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters (Amended 6/7/24) | Natural gas-fired water heaters, boilers, and process heaters that are between 0.075 and 2 MMBtu/hr | The various limits in the rule apply to different types of units based on use and size. Includes a zero emission NOx limit for new installations of applicable large water heaters, small boilers, and process heaters based on future effective dates and for existing units after the unit reaches a specific age |
| Rule 1109.1 – Emissions of Oxides of Nitrogen from Petroleum Refineries and Related Operations (Adopted 11/5/21) | Combustion equipment including, but not limited to, boilers and process heaters at petroleum refineries and facilities with related operations to petroleum refineries | The various limits in the rule apply to different types of units based on use and size but can be achieved using the following control technologies: LNB, ULNB, SCR |

iii. Review of Control Measures in Other Jurisdictions

To find potential measures to consider as contingency measures, staff evaluated the control measures in place in other California jurisdictions such as San Joaquin Valley Air Pollution Control District (SJVAPCD) and Ventura County APCD (VCAPCD) that regulate boilers, steam generators, and process heaters. These rules are not structured identically across agencies or rules, which can make direct comparison difficult. For example, subcategories are organized differently among the rules. Table 4-4 summarizes the

applicable control measures identified in other jurisdictions. In the table, two South Coast AQMD rules for boilers, steam generators, and process heaters – Rules 1135 and 1146 – are compared with SJVAPCD Rules 4306 and 4320 and VCAPCD Rule 74.15. For the purpose of comparison, source category numbering follows the format used in SJVAPCD Rule 4320.

Boilers, steam generators, and process heaters permitted to operate in the Basin are sources of NO_x emissions. Most of these units are installed with ULNB and/or SCR and they exclusively burn natural gas. South Coast AQMD Rule 1146 is more stringent than VCAPCD Rule 74.15, but is less stringent than SJVAPCD Rules 4306 and 4320 for some of the unit categories listed below:

- Category A1 (fire tube boilers rated > 5 MMBtu/hr and ≤ 20 MMBtu/hr)
 - Rule 4320 limit: 5 ppm
 - Rule 1146 limit: 7 ppm
- Category A3 (units fired on digester gas rated > 5 MMBtu/hr and ≤ 20 MMBtu/hr)
 - Rules 4306 and 4320 limits: 9 ppm
 - Rule 1146 limit: 15 ppm
- Category A4 (thermal fluid heaters rated > 5 MMBtu/hr and ≤ 20 MMBtu/hr)
 - Rules 4306 and 4320 limits: 9 ppm
 - Rule 1146 limit: 12 ppm
- Category A5 (all other units rated > 5 MMBtu/hr and ≤ 20 MMBtu/hr)
 - Rule 4320 limit: 5 ppm
 - Rule 1146 limit: 9 ppm
- Categories B (B1, B2, and B3 – boilers rated > 20.0 MMBtu/hr and ≤ 75 MMBtu/hr)
 - Rule 4320 limit: 2.5 ppm
 - Rule 1146 limit: 7 ppm for B1 (20 to 75 MMBtu/hr) and 5 ppm for B2 (20 to 75 MMBtu/hr) and B3 (> 75 MMBtu/hr)
- Category C1 (oilfield steam generator rated > 5.0 MMBtu/hr and ≤ 20.0 MMBtu/hr)
 - Rule 4320 limit: 6 ppm
 - Rule 1146 limit: 9 ppm
- Category C2 (units rated > 20 MMBtu/hr and ≤ 75 MMBtu/hr)
 - Rule 4320 limit: 5 ppm
 - Rule 1146 limit: 9 ppm
- Category D3 (refinery boilers rated >110 MMBtu/hr)
 - Rule 4320 limit: 2.5 ppm
 - Rule 1109.1 limit: 9 ppm
- Category D4 (refinery process heaters rated > 5.0 MMBtu/hr and ≤ 40.0 MMBtu/hr)
 - Rule 4320 limit: 5 ppm
 - Rule 1109.1 limit: 9 ppm
- Category D6 (refinery process heaters rated >110 MMBtu/hr)
 - Rule 4320 limit: 2.5 ppm
 - Rule 1109.1 limit: 5 ppm

SJVAPCD Rule 4320 includes technology forcing NO_x limits. For example, for categories A1 (5 ppm), B1 (2.5 ppm), C1 (6 ppm), and C2 (5 ppm), very few units have achieved these NO_x limits in the SJVAPCD. As of 2020, only 2 percent of 550 units (i.e., 11 units) in these categories were permitted to comply with these NO_x limits.²¹ Another example is for categories B2 (2.5 ppm), B3 (2.5 ppm), D3 (2.5 ppm), D4 (5 ppm), and D6 (2.5 ppm). These NO_x limits have not been demonstrated to be achievable in practice for large scale applications. Because of these technological challenges, Rule 4320 allows operators to pay a compliance fee in lieu of meeting the technology forcing limits until such limits are proven to be feasible in practice. This contrasts with the limits in South Coast AQMD's rules which are mandatory and do not offer fee based alternative compliance options.

South Coast AQMD Rule 1146 establishes NO_x limits for existing boiler, steam generator and process heater units which have been demonstrated to be achieved in practice. The current NO_x limits for gaseous fuel fired units, excluding digester and landfill gases and fire-tube boilers, with a rated heat input capacity between 5 and 75 MMBtu/hr is 9 ppm in Rule 1146. Based on vendor discussion, NO_x emissions at a level of 7 ppm or lower are feasible only with ULNB replacement and new installation. The source test results also showed that it is technically feasible for existing Rule 1146 units (between 5 and 75 MMBtus/hr) to achieve an emission limit of 7 ppm or less with burner replacements. Achieving a 5 ppm NO_x limit usually requires the use of SCR. SCR systems are generally utilized for units greater than 10 MMBtu/hr. Although it is theoretically feasible, there are several practical limitations impacting the ability of SCR retrofits to meet 4 ppm or less, such as the age, flow, and size of the catalyst bed of the existing SCR system. The most significant constraint is the inadequate safety margin between the permitted limit and the actual emissions to account for fluctuations in external factors such as ambient temperature or fuel heat input. Due to those limitations, it would not be technologically feasible for SCR retrofits to achieve the lower NO_x emission limit (e.g., 2.5 ppm).²²

The NO_x emission limit for thermal fluid heaters in Rule 1146 is 12 ppm. Thermal fluid heaters use water as the heating fluid and typically operate at much higher temperatures than process heaters, which results in higher NO_x emissions. ULNB replacement for existing units could meet a 12 ppm NO_x limit at the time of rule development, while an emission limit of 9 ppm is available for new units of certain applications. Based on the assumptions of 10 to 90 percent operating capacity of the thermal fluid heaters at different heat capacity sizes, lowering the emission limit from 12 ppm to 9 ppm for existing units would cost \$58,000 to \$523,000 per ton of NO_x reduced.²³ Due to high cost-effectiveness, the 9 ppm NO_x emission limit is considered not feasible.

²¹ SJVAPCD, Final Staff Report, "Proposed Amendment to Rule 4306 (Boilers, Steam Generators, and Process Heaters - Phase 3) Proposed amendments to Rule 4320 (Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater Than 5.0 MMBtu/hr)," December 17, 2020, Appendix B: Emissions Reduction Analysis ("Boilers Staff Report: Appendix B")

²² South Coast AQMD, Final Staff Report for PARs 1146, 1146.1 and 1146.2, December 2018.

<http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2018/2018-dec7-028.pdf?sfvrsn=6>

²³ South Coast AQMD, 2022 Air Quality Management Plan, Attachment VI-A-1B to Appendix VI, December 2, 2022. <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/appendix-vi.pdf?sfvrsn=12>

The NO_x emission limit for digester gas fired units in Rule 1146 is currently 15 ppm. In addition, South Coast AQMD Rule 1179.1 applies to boilers located at publicly owned treatment works (POTW) facilities and contains an identical 15 ppm NO_x limit for digester gas fired units greater than 2 MMBtu/hr. Based on discussion with vendors, digester gas fired units can be guaranteed to meet 12 ppm while 9 ppm is dependent on fuel composition and heating value which can vary depending on facility. NO_x concentration limits below 7 ppm are not feasible due to the presence of hydrogen sulfide (H₂S). Lowering NO_x emissions in digester gas fired units might also cause an increase in carbon monoxide (CO) emissions.

Rule 1109.1 NO_x limits are 5 ppm with an interim limit of 7.5 ppm for refinery boilers and process heaters with rated heat input greater than 110 MMBtu/hr. For boilers greater than 110 MMBtu/hr, the class and category are cost-effective for all units to meet the 5 ppm NO_x limit; however, a couple of units were operating near the 5 ppm limit with very high cost-effectiveness (more than \$200,000 per ton reduced). Five units were also operating at less than 7.5 ppm with potential emission reductions of 0.02 tpd at a cost of nearly \$20 million. Refinery boiler and heater's NO_x limits in Rule 1109.1 are less stringent than SJVAPCD's technology forcing limits in Rule 4320; however, as stated earlier in this section, it would be technologically infeasible to achieve the 2.5 ppm NO_x limit in practice. In addition, Rule 1109.1 is, overall, more stringent than SJVAPCD Rule 4320, as it applies to a larger and more diverse equipment universe. For example, Rule 1109.1 regulates NO_x emissions from fluidized catalytic cracking units (FCCUs) and coke calciners, while staff was not able to identify any SJVAPCD rule regulating these sources.

The implementation timeline is an additional consideration regarding the feasibility of the lower NO_x limits discussed in this section. Achieving these limits would potentially require single stage SCR, two stage SCR systems, or next generation ULNB combined with SCR. These emission control technologies require complex retrofits or full unit replacement and require significantly longer than two years to implement. For this reason, South Coast AQMD rules typically provide more than three years for operators to install these technologies to comply with lower emission limits.²⁴ It is also worth noting that some heaters are incompatible with some of these control technologies (e.g., two stage SCR systems) due to space limitations.

²⁴ U.S. EPA similarly concluded that tighter limits for this source category are infeasible as a contingency measure due to SCR units requiring more than two years to install in its recently proposed Contingency Measures for Fine Particulate Matter Standards for San Joaquin Valley. U.S. EPA, Clean Air Plans; Contingency Measures for the Fine Particulate Matter Standards; San Joaquin Valley, California, 88 Fed. Reg. 88008 (December 20, 2023). <https://www.federalregister.gov/documents/2023/12/20/2023-27686/clean-air-plans-contingency-measures-for-the-fine-particulate-matter-standards-san-joaquin-valley#page-88008>

**TABLE 4-4
COMPARISON OF EXISTING CONTROL REQUIREMENTS (BOILERS, STEAM GENERATORS, AND PROCESS HEATERS)**

| Rule Element | South Coast AQMD Rule 1146 – Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters (Amended 12/4/20) | SJVAPCD Rule 4306 – Boilers, Steam Generators, and Process Heaters (Amended 12/17/20) | SJVAPCD Rule 4320 – Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr (Amended 12/17/20) | VCAPCD Rule 74.15 – Boilers, Steam Generators and Process Heaters (Amended 9/10/24) |
|---|--|--|---|---|
| Applicability | Boilers, steam generators, and process heaters of equal to or greater than 5 MMBtu/hr rated input capacity used in all industrial, institutional, and commercial operations | Gaseous or liquid fuel fired boilers, steam generator, or process heater with a total rated heat input greater than 5 MMBtu/hr | Gaseous or liquid fuel fired boilers, steam generator, or process heater with a total rated heat input greater than 5 MMBtu/hr | Portable and stationary boilers, steam generators, and process heaters fired on any gaseous fuel or liquid fuel with a rated heat input capacity equal to or greater than 5 MMBtu/hr, except for utility electric power generating units and any auxiliary boiler thereof and water heaters |
| A. Units with a total rated heat input > 5 MMBtu/hr to ≤ 20 MMBtu/hr, except for Categories C through G units | | | | |
| A1. Fire Tube Boilers | 7 ppm | 7 ppm | 5 ppm | 9 ppm |
| A2. Units at Schools | 9 ppm | 9 ppm | 9 ppm | 9 ppm or 12 ppm |
| A3. Units fired on Digester Gas | 15 ppm | 9 ppm | 9 ppm | 15 ppm |
| A4. Thermal Fluid Heaters | 12 ppm | 9 ppm | 9 ppm | 9 ppm or 12 ppm |
| A5. All other units | 9 ppm | 9 ppm | 5 ppm | 9 ppm or 12 ppm |
| B. Units with a total rated heat input > 20 MMBtu/hr, except for Categories C through G units | | | | |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1146 – Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters (Amended 12/4/20) | SJVAPCD Rule 4306 – Boilers, Steam Generators, and Process Heaters (Amended 12/17/20) | SJVAPCD Rule 4320 – Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr (Amended 12/17/20) | VCAPCD Rule 74.15 – Boilers, Steam Generators and Process Heaters (Amended 9/10/24) |
|--|--|---|---|--|
| B1. Fire Tube Boilers with a total rated heat input > 20.0 MMBtu/hr and ≤ 75 MMBtu/hr | 7 ppm | 7 ppm | 2.5 ppm | 9 ppm |
| B2. All other units with a total rated heat input > 20.0 MMBtu/hr and ≤ 75 MMBtu/hour | 9 ppm for units with previous NOx limit ≤ 12 and > 5 ppm prior to 12/7/18 or 5 ppm | 7 ppm | 2.5 ppm | 9 ppm or 12 ppm |
| B3. Units with a rated heat input > 75 MMBtu/hr | 5 ppm | 5 ppm | 2.5 ppm | 9 ppm or 12 ppm |
| E. Lower Use Units | | | | |
| E1. Units limited by a Permit to Operate to an annual heat input of 9 billion Btu/year to 30 billion Btu/year “Low Use” (no more than 10 percent operating capacity) | <ul style="list-style-type: none"> Operate units so stack is maintained with gas oxygen concentrations less than or equal to three percent on a dry basis for 15 min averaging period Tune units at least twice a year or follow different tune up procedure | 30 ppm | 9 ppm * Units limited by a Permit to Operate to an annual heat input >1.8 billion Btu/year but < 30 billion Btu/year | <ul style="list-style-type: none"> Operate units so stack is maintained with gas oxygen concentrations less than or equal to three percent on a dry basis for 15 min averaging period Tune units at least twice a year or follow different tune up procedure |
| Liquid Fueled Units | 40 ppm | 40 ppm | 40 ppm | 40 ppm |

c. Conclusion

Staff did not find any opportunity to accommodate contingency measures for this category of units due to technological and economic infeasibility and the implementation timeline limitations imposed by the U.S. EPA’s guidance. South Coast AQMD’s rules as well as regulations in other jurisdictions do not enforce VOC emission limits for boilers, steam generators, or process heaters. For NOx, staff considered several potential measures such as lower NOx limits using ULNB and SCR, but these were not suitable contingency measures considering that it would be technologically infeasible to design, install and operate advanced emission control technology within two years of the triggering event. This feasibility consideration is discussed in more detail in the evaluation section. A contingency measure that will not result in emission reductions until more than two years in the future would not satisfy the criteria of contingency measures as defined in the U.S. EPA’s guidance.

2. Reciprocating Internal Combustion Engines (RICE)

a. Overview

A stationary RICE includes any internal combustion engine (ICE) which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICEs are used in a wide array of industries, including electricity generation (either as stand-alone generators or in cogeneration applications); oil and gas production; agriculture; and commercial/institutional settings (including as back-up electricity generators). NOx emissions are generated by engines combusting either gaseous or liquid fuels.

As summarized in Table 4-5, RICE account for 0.91 tpd of VOC and 9.37 tpd of NOx emissions in the 2037 baseline inventory.

**TABLE 4-5
STATIONARY ENGINE EMISSIONS BASED ON 2037 SUMMER PLANNING INVENTORY**

| Industry | VOC (tpd) | NOx (tpd) |
|---|-------------|-------------|
| 010 – Electric Utilities | 0.04 | 0.25 |
| 020 – Cogeneration | 0.00 | 0.00 |
| 030 – Oil and Gas Production (Combustion) | 0.07 | 0.85 |
| 040 – Petroleum Refining (Combustion) | 0.01 | 0.02 |
| 050 – Manufacturing and Industrial | 0.43 | 3.20 |
| 052 – Food and Agricultural Processing | 0.01 | 0.08 |
| 060 – Service and Commercial | 0.23 | 2.44 |
| 099 – Other (Fuel Combustion) | 0.13 | 2.53 |
| 610 – Residential Fuel Combustion | 0.00 | 0.00 |
| Total¹ | 0.91 | 9.37 |

¹ Values may not sum due to rounding.

b. Evaluation

i. Available Control Technologies

Available control techniques for stationary engines vary by engine configuration and are summarized below. Each engine type produces emissions of NO_x and VOC at different rates and can have differing approaches for controlling emissions.

- Compression-ignition (CI) engines: CI engines are primarily diesel engines but could also be dual-fuel (diesel and natural gas) engines. NO_x can be controlled with either combustion controls (e.g., exhaust gas recirculation) and/or exhaust treatment such as SCR.
- Spark-ignition (SI) four-stroke rich-burn (4SRB) engines: 4SRB engines use natural gas as primary fuel. NO_x emissions are inherently lower from rich-burn engines compared to lean-burn and add-on controls include three-way catalysts (also known as non-selective catalytic reduction (NSCR)).
- SI four-stroke lean-burn (4SLB) engines: Natural gas is the primary fuel for 4SLB engines. NO_x emissions can be controlled by combustion techniques or exhaust controls, such as SCR.
- SI two-stroke lean-burn (2SLB) engines: 2SLB engines primarily use natural gas. Typically, combustion controls are applied to reduce NO_x, including layered combustion.²⁵

Existing federal regulations require manufacturers to certify stationary CI engines to the U.S. EPA's tiered engine requirements (Tiers 1-4, with Tier 4 being the most stringent).²⁶ Since 2014, new CI engines have been required to meet Tier 4 criteria except for engines qualifying as emergency engines which must be certified to Tier 2 or Tier 3 standards. However, U.S. EPA's requirements only apply to new engines and do not require owners/operators to replace older engines. U.S. EPA-certified Tier 4 engines are typically not required to install additional controls to meet Best Available Control Technology/Lowest Achievable Emission Rate (BACT/LAER) determinations for NO_x and VOC. A search of the Reasonably Available Control Technology (RACT)/BACT/LAER Clearinghouse (RBLC) did not identify "beyond Tier 4" restrictions for CI engines.

²⁵ In a layered or stratified charge arrangement: a pre-stratified control kit is applied that results in lower combustion temperatures and lower NO_x formation. Example technologies that could be considered layered stratification include turbochargers and inter-cooling, pre-chamber ignition or high energy ignition, improved fuel injection control, and air/fuel ratio control.

²⁶ Title 40, Code of Federal Regulations, Part 60 (40 CFR 60) Subparts III – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-III> and Title 40, Code of Federal Regulations Part 1039 (40 CFR 1039) – Control of Emissions from New and In-Use Nonroad Compression-Ignition Engines <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-U/part-1039>

Existing federal regulations require stationary SI engines to meet emissions standards, but do not require U.S. EPA certification for all new SI engines.²⁷ Like CI engines, these regulations do not require owner/operators to replace older engines or upgrade engines to meet the most recent standards. However, to meet BACT/LAER determinations for NOx, the addition of add-on NOx controls is often required (e.g., SCR or an NSCR, depending on engine type).²⁸

ii. South Coast AQMD Control Measures

Table 4-6 summarizes South Coast AQMD rules and control measures that are applicable to stationary engines. In addition to rule requirements, South Coast AQMD requires that new or modified emergency backup generators with greater than or equal to 1,000 horsepower CI engines meet updated LAER and BACT guidelines which require that the units achieve U.S. EPA’s Tier 4 Final emission standards.²⁹ Existing Tier 2 units can achieve Tier 4 Final NOx emission limits through the use of SCR.

**TABLE 4-6
SOUTH COAST AQMD RULE FOR RECIPROCATING ENGINES**

| South Coast AQMD Rule | Applicability | Emission Limits |
|---|---|---|
| Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines (Amended 11/3/23) | All stationary and portable engines over 50 rated brake horsepower (bhp) | |
| | Stationary ICE ≥ 50 bhp, including landfill and digester gas (i.e., biogas) fired engines | 11 ppm NOx 30 ppm VOC |
| | Stationary, low-use engines | 36 ppm NOx for ≥ 500 bhp 45 ppm NOx for < 500 bhp 250 ppm VOC |
| | Stationary, low-use landfill or biogas fired engines | 36 x ECF* ppm NOx for ≥ 500 bhp, 45 x ECF ppm NOx for < 500 bhp 40 ppm VOC (landfill gas) 250 x ECF ppm VOC (biogas) |
| | Stationary, non-emergency electrical generators | 0.070 pounds per mega Watt-hour (lb/MWh) NOx 0.10 lb/MWh VOC |

* ECF is the efficiency correction factor and is no less than 1.0.

²⁷ Title 40, Code of Federal Regulations (CFR) Part 60 (40 CFR 60), Subpart JJJJ – [Standards of Performance for Stationary Spark Ignition Internal Combustion Engines](#)

²⁸ U.S. EPA, RACT/BACT/LAER Clearinghouse (RBLC) <https://cfpub.epa.gov/rblc/index.cfm?action=Search.BasicSearch&lang=en>

²⁹ South Coast AQMD, Proposed Amendments to BACT Guidelines, September 22, 2022. <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2022/2022-sept-030.pdf?sfvrsn=6You>

iii. Review of Control Measures in Other Jurisdictions

Table 4-7 compares and summarizes the applicable control measures in South Coast AQMD with the requirements in other jurisdictions including SJVAPCD, the Sacramento Metropolitan Air Quality Management District (SMAQMD), and the Maricopa County Air Quality Department (MCAQD). The statewide Air Toxics Control Measure (ATCM) for stationary CI engines is also evaluated.³⁰ South Coast AQMD's Rule 1110.2 requires most engines to meet 11 ppm and 30 ppm NO_x and VOC emission limits, respectively. Some engines used in agricultural operations can be exempt from this requirement if a Tier 4 diesel engine is installed and other requirements are met. Overall, South Coast AQMD's Rule 1110.2 is designed to incentivize electrification and has the most stringent emission limits for stationary engines compared to other air districts.

³⁰ CARB, Amendments to the Airborne Toxic Control Measure for Stationary Compression Ignition Engines, May 19, 2011. <https://ww2.arb.ca.gov/sites/default/files/classic/diesel/documents/finalreg2011.pdf>

**TABLE 4-7
COMPARISON OF EXISTING CONTROL REQUIREMENTS (RECIPROCATING INTERNAL COMBUSTION ENGINES)**

| Rule Element | South Coast AQMD Rule 1110.2 – Emissions from Gaseous and Liquid-Fueled Engines (Amended 11/3/23) | SJVAPCD Rule 4702 – Internal Combustion Engines (Amended 8/19/21) | SMAQMD Rule 412 – Stationary Internal Combustion Engines Located at Major Sources of NOx (Adopted 6/1/95) | Maricopa County, AZ Rule 324 – Stationary Reciprocating Internal Combustion Engines (RICE) (Amended 6/23/21) | CA ATCM for Diesel Stationary Compression Ignition Engines (Amended 5/19/11) |
|--|---|--|--|---|--|
| Applicability (Equipment, size, fuel type) | All stationary and portable engines rated >50 bhp | All internal combustion engines >50 bhp* * For non-agriculture operations (AO) engines >25 to ≤50 bhp, if non-certified, these may not be offered for sale. | Stationary IC engines rated >50 bhp located at major sources of NOx* * Major sources have potential to emit >25 tons per year (tpy) | Stationary IC engines >125 bhp used for cogeneration; located not at a major NOx source Stationary IC engines >50 bhp used for cogen not at a major NOx source if all engines aggregate to >125 bhp Stationary IC engines >50 bhp at major NOx sources Nonroad engines >125 bhp with potential to emit: 0.5 tpy PM2.5; 1.0 tpy NOx, 0.5 tpy VOC; or 1.0 tpy CO | All stationary diesel engines >50 bhp |
| Control Measures | | | | | |
| NOx emissions limit(s) | Stationary engines with approved emission control plan: 11 ppm | Non-AO SI engines by 12/31/2023: 1. Rich-burn: a. 11 ppm 2. Lean-burn: | SI rich-burn: 25 ppm or 90% control SI lean-burn: 65 ppm or 90% control | CI engines >250 bhp: 530 ppm CI engines >399 bhp: 550 ppm | Generally the same as EPA certified standards |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1110.2 – Emissions from Gaseous and Liquid-Fueled Engines (Amended 11/3/23) | SJVAPCD Rule 4702 – Internal Combustion Engines (Amended 8/19/21) | SMAQMD Rule 412 – Stationary Internal Combustion Engines Located at Major Sources of NOx (Adopted 6/1/95) | Maricopa County, AZ Rule 324 – Stationary Reciprocating Internal Combustion Engines (RICE) (Amended 6/23/21) | CA ATCM for Diesel Stationary Compression Ignition Engines (Amended 5/19/11) |
|--------------|---|---|---|--|--|
| | <p>Other stationary engines without an emission control plan, biogas-fired: 11 ppm</p> <p>Limits for low-use engines*:</p> <ul style="list-style-type: none"> • <500 bhp = 45 ppm • ≥500 bhp = 36 ppm <p>* Low use engines <500 HOP/yr or 1 billion Btu/yr. Slightly higher limits are also applicable to landfill or biogas fired engines to account for efficiency</p> <p>Non-emergency electrical generators: 0.070 lb/MWh</p> <p>Note: agricultural and non-agricultural engines held to the same standards but different compliance schedules applied.</p> | <p>a. Gas compression engines: 40 ppm</p> <p>b. >50% waste gas: 40 ppm</p> <p>c. Others: 11 ppm</p> <p>AO SI Engines:</p> <ul style="list-style-type: none"> • Rich-burn (by 12/31/23): 11 ppm or 0.15 g/bhp-hr • Lean-burn (by 12/31/29): 0.6 g/bhp-hr or 43 ppm <p>Certified AO and non-AO compression-ignited (CI) engines (no later than 6/1/18):</p> <ul style="list-style-type: none"> • EPA certified Tier 1 or 2: EPA Tier 4 • EPA certified Tier 3 or 4: CI standard in effect at time of installation <p>Non-certified AO and non-AO CI engines (by 2011):</p> | <p>CI: 80 ppm or 90% control</p> | <p>(at major sources, all CI: 530 ppm)</p> <p>SI lean-burn: 110 ppm</p> <p>SI rich-burn: 20 ppm</p> | |

| Rule Element | South Coast AQMD Rule 1110.2 – Emissions from Gaseous and Liquid-Fueled Engines (Amended 11/3/23) | SJVAPCD Rule 4702 – Internal Combustion Engines (Amended 8/19/21) | SMAQMD Rule 412 – Stationary Internal Combustion Engines Located at Major Sources of NOx (Adopted 6/1/95) | Maricopa County, AZ Rule 324 – Stationary Reciprocating Internal Combustion Engines (RICE) (Amended 6/23/21) | CA ATCM for Diesel Stationary Compression Ignition Engines (Amended 5/19/11) |
|---------------------|---|---|---|--|--|
| | | <ul style="list-style-type: none"> • 50 – 500 bhp: EPA Tier 3 or Tier 4 • 500 – 750 bhp and <1000 annual HOP: EPA Tier 3 • >750 bhp and <1000 annual HOP: EPA Tier 4 | | | |
| VOC Emission Limits | <p>Stationary engines with approved emission control plan: 30 ppm</p> <p>Other stationary engines without an emission control plan, biogas-fired: 30 ppm</p> <p>Limit for low-use engines*: 250 ppm</p> <p>* Low use engines <500 HOP/yr or 1 billion Btu/yr. Slightly higher limits are also applicable to landfill or biogas fired engines to account for efficiency</p> <p>Non-emergency electrical generators: 0.10 lb/MWh</p> | <p>Non-AO SI engines by 12/31/2023:</p> <ol style="list-style-type: none"> 1. Rich-burn: 90 ppm 2. Lean-burn: 90 ppm <p>AO SI Engines by 12/31/2023:</p> <ul style="list-style-type: none"> • Rich-burn: 90 ppm • Lean-burn: 90 ppm <p>Certified AO and non-AO compression-ignited (CI) engines (no later than 6/1/18):</p> <ul style="list-style-type: none"> • EPA certified Tier 1 or 2: EPA Tier 4 • EPA certified Tier 3 or 4: CI standard in effect at time of installation | <p>SI rich-burn: 250 ppm</p> <p>SI lean-burn: 750 ppm</p> <p>CI: 750 ppm</p> | <p>CI engines >250 bhp: Not Applicable</p> <p>SI lean-burn: 800 ppm</p> <p>SI rich-burn: 800 ppm</p> | <p>Generally the same as EPA certified standards</p> |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1110.2 – Emissions from Gaseous and Liquid-Fueled Engines (Amended 11/3/23) | SJVAPCD Rule 4702 – Internal Combustion Engines (Amended 8/19/21) | SMAQMD Rule 412 – Stationary Internal Combustion Engines Located at Major Sources of NOx (Adopted 6/1/95) | Maricopa County, AZ Rule 324 – Stationary Reciprocating Internal Combustion Engines (RICE) (Amended 6/23/21) | CA ATCM for Diesel Stationary Compression Ignition Engines (Amended 5/19/11) |
|--------------|--|---|---|--|--|
| | <p>Note: agricultural and non-agricultural engines held to the same standards but different compliance schedules applied.</p> | <p>Non-certified AO and non-AO CI engines (by 2011):</p> <ul style="list-style-type: none"> • 50 – 500 bhp: EPA Tier 3 or Tier 4 • 500 – 750 bhp and <1000 annual HOP: EPA Tier 3 • >750 bhp and <1000 annual HOP: EPA Tier 4 | | | |
| Exemptions | <ul style="list-style-type: none"> • Engines powering orchard wind machines • Emergency standby engines, engines use for fire-fighting and flood control, and any other emergency engines limited to 200 hrs/yr • Laboratory engines • Engines used for performance testing • Auxiliary engines used to power other engines/turbines during start-ups | <ul style="list-style-type: none"> • Engines used to propel implements of husbandry • Engines used exclusively to power wind machines • Some de-rated AO and non-AO engines with de-rating before 6/1/2005 (below 50 bhp) • Engines powering mobile agricultural equipment • State-registered or Rule 2280 registered portable equipment engines | <ul style="list-style-type: none"> • Emergency standby engines • Engines used exclusively for agricultural purposes • Engine test stands • Engine control evaluations • Nonroad engines • Motor vehicle engines • Flight line engines • Low use engines: <ul style="list-style-type: none"> ○ SI: varies by engine size, range is 40-200 hrs/yr ○ CI: varies by engine size, range is 200-1,435 hrs/yr | <ul style="list-style-type: none"> • Emergency standby engines used for power, emergency services, sewage overflow • Compressed gas stationary RICE used for solar testing and research • Engine performance verification, including at the production facility • Engine development and testing • Flight line engines • Nonroad engines • Low use engines: | Some emergency engines not required to install particulate matter controls |

| Rule Element | South Coast AQMD Rule 1110.2 – Emissions from Gaseous and Liquid-Fueled Engines (Amended 11/3/23) | SJVAPCD Rule 4702 – Internal Combustion Engines (Amended 8/19/21) | SMAQMD Rule 412 – Stationary Internal Combustion Engines Located at Major Sources of NOx (Adopted 6/1/95) | Maricopa County, AZ Rule 324 – Stationary Reciprocating Internal Combustion Engines (RICE) (Amended 6/23/21) | CA ATCM for Diesel Stationary Compression Ignition Engines (Amended 5/19/11) |
|--------------|---|---|---|---|--|
| | <ul style="list-style-type: none"> • Portable engines registered under state registration (Title 13, Article 5 of CCR) • Agriculture stationary engines that: <ul style="list-style-type: none"> ○ cannot get electrical service or operator does not qualify for state funding under CA Health and Safety Code Section 44229; and ○ are replaced with Tier 4 replacement engines; and ○ do not operate the Tier 4 engines in a manner to exceed the not-to-exceed standards of 40 CFR Part 1039 Section 1039.101(e) • Some additional exemptions also apply | <ul style="list-style-type: none"> • Emergency standby or low use engines • Public safety equipment | | <ul style="list-style-type: none"> ○ Engines ≤1000 bhp operating <200 hrs/yr ○ Engines >1000 bhp operating <100 hrs/yr | |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1110.2 – Emissions from Gaseous and Liquid-Fueled Engines (Amended 11/3/23) | SJVAPCD Rule 4702 – Internal Combustion Engines (Amended 8/19/21) | SMAQMD Rule 412 – Stationary Internal Combustion Engines Located at Major Sources of NOx (Adopted 6/1/95) | Maricopa County, AZ Rule 324 – Stationary Reciprocating Internal Combustion Engines (RICE) (Amended 6/23/21) | CA ATCM for Diesel Stationary Compression Ignition Engines (Amended 5/19/11) |
|--------------------------------------|---|---|---|--|--|
| NOx emissions compliance alternative | None listed | Payment of NOx emissions fee in lieu of meeting the emissions limits: sunsets 12/31/23 after which engines must meet limits for non-AO SI engines | None listed | None listed | None listed |

c. Conclusion

Staff does not propose any contingency measures for stationary engines. Staff did not identify any more stringent emission limits in other districts' rules. While lower limits of NO_x could potentially be achieved by installing SCR, installing SCR and achieving reductions within two years of triggering would be technically and practically infeasible. Contingency measures should be measures that would result in emission reductions within a year after the triggering event, or within two years with proper justification. A contingency measure that will not result in emission reductions until further in the future would not satisfy the criteria of contingency measures as defined in the U.S. EPA's guidance.

3. Combustion Turbines

a. Overview

Industries operating in the Basin that use combustion turbines include the following: electric utilities; cogeneration; oil and gas production; petroleum refining; and commercial operations. Most often, combustion turbines are used to generate power for supplying the electrical grid or for onsite use. Natural gas and diesel/distillate oil are the most common fuels combusted; however, according to the emissions inventory, other fuels used in the Basin include landfill gas, refinery gas, and process gas.

As summarized in Table 4-8 by industry, combustion turbines account for 0.87 tpd of VOC and 2.83 tpd of NO_x emissions in the 2037 baseline inventory.

**TABLE 4-8
COMBUSTION TURBINE EMISSIONS BASED ON 2037 SUMMER PLANNING INVENTORY**

| Industry | VOC (tpd) | NO _x (tpd) |
|---|-------------|-----------------------|
| 010 – Electric Utilities | 0.17 | 1.84 |
| 020 – Cogeneration | 0.00 | 0.01 |
| 030 – Oil and Gas Production (Combustion) | 0.09 | 0.05 |
| 040 – Petroleum Refining (Combustion) | 0.50 | 0.38 |
| 050 – Manufacturing and Industrial | 0.02 | 0.08 |
| 052 – Food and Agricultural Processing | 0.00 | 0.00 |
| 060 – Service and Commercial | 0.10 | 0.47 |
| 099 – Other (Fuel Combustion) | 0.00 | 0.00 |
| 610 – Residential Fuel Combustion | 0.00 | 0.00 |
| Total¹ | 0.87 | 2.83 |

¹ Values may not sum due to rounding.

The most common fuels used to generate power in the combustion turbine category are natural gas, landfill gas, process gas, and refinery gas. Electric utilities account for over 60 percent of the category total NO_x emissions, and natural gas is the dominant fuel combusted in electric utility turbines taking up about 80 percent of NO_x emissions. Service and commercial and petroleum refining are the second and third largest categories of NO_x emissions for combustion turbines, respectively. For the service and commercial

sector, NO_x emissions are greatest from landfill gas-fired turbines, while combustion of process and refinery gases combined is the dominant (over 80 percent) source of NO_x emissions from turbines for petroleum refining because refinery fuel gas (RFG) burns at higher temperatures and thus can increase NO_x emissions compared to turbines burning natural gas. For example, dry low NO_x (DLN) combustors can have approximately 10 percent more NO_x emissions when operating on refinery gas compared to natural gas.

Control of NO_x from combustion turbines can be accomplished using combustion controls, such as water or steam injection DLN and ULNB, or post-combustion controls, including SCR.³¹ DLN combustors can achieve between 9 ppm and 25 ppm in gas turbines operating with natural gas and between 10 ppm and 27.5 ppm in gas turbines operating on refinery gas. SCR can achieve about 95 percent NO_x reduction in both types of gas turbines. It is common for both control technologies to be applied (e.g., DLN + SCR + oxidation catalyst). DLN and SCR, when combined, can achieve 2 ppm NO_x with proper engineering and design.

b. Evaluation

In the Basin, emissions from combustion turbines are regulated by Rules 1134, 1135, and 1109.1. Rule 1109.1 regulates NO_x emissions from turbines located at petroleum refineries. Rule 1134 establishes limits for NO_x emissions based on unit size (0.3 MW and greater) and fuel type (gas or oil). The rule has different compliance limits through the end of 2023 by unit size and has varied emission limits on and after January 1, 2024 by fuel type. Rule 1135 establishes 2 ppm and 2.5 ppm NO_x limits for combined cycle and simple cycle gas turbines, respectively, at electricity generating facilities. Rule 1135 was recently amended to incorporate new NO_x emission caps for electric generating units (EGUs) located on Santa Catalina Island. The emission limits under Rules 1134, 1135, and 1109.1 are further detailed in Table 4-9. All emission limits are expressed on a dry volume basis, corrected to 15 percent O₂.

³¹ Sargent & Lundy, L.L.C. prepared for Eastern Research Group, Inc., Combustion Turbine NO_x Control Technology Memo, January 2022. <https://www.epa.gov/system/files/documents/2022-03/combustion-turbine-nox-technology-memo.pdf>

**TABLE 4-9
SOUTH COAST AQMD RULES FOR COMBUSTION TURBINES**

| Rule | Applicability | Control Measure |
|--|---|---|
| Rule 1134 – Emissions of Oxides of Nitrogen from Stationary Gas Turbines (Amended 2/4/22) | All stationary gas turbines, 0.3 MW and greater, excluding units subject to Rules 1135 and 1109.1 | NOx emission limits are identified below by unit size (MW rating) and by fuel type. <u>Beginning 1/1/2024:</u> <ul style="list-style-type: none"> • Liquid fuel turbines on outer continental shelf (OCS): 30 ppm • Natural gas - combined cycle/cogeneration turbine: 2 ppm • Natural gas - simple cycle: 2.5 ppm • Produced gas: 9 ppm • Produced gas - OCS turbines: 15 ppm • Other (including recuperative gas turbines): 12.5 ppm • Natural gas - compressor gas turbines: 3.5 ppm |
| Rule 1135 – Emissions of Oxides of Nitrogen from Electricity Generating Facilities (Amended 10/4/24) | Electric generating units at electricity generating facilities | Combined cycle gas turbines and associated duct burners: 2 ppm Simple cycle gas turbines: 2.5 ppm A declining NOx emissions cap of 45 tpy by 2027 to 6 tpy by 2035 for EGUs at Santa Catalina Island |
| Rule 1109.1 – Emissions of Oxides of Nitrogen from Petroleum Refineries and Related Operations (Adopted 11/5/21) | Units at petroleum refineries | Gas turbines fueled with natural gas: 2 ppm Gas turbines fueled with gaseous fuel other than natural gas: 3 ppm |

Staff examined stationary gas turbine rules in other California air districts as well as the RBLC for comparison to Rules 1134, 1135, and 1109.1, as summarized in Table 4-10.

**TABLE 4-10
COMPARISON OF EXISTING CONTROL REQUIREMENTS FOR GAS TURBINES**

| Source Category | South Coast AQMD Rules 1134, 1135, and 1109.1 | SJVAPCD Rule 4703 – Stationary Gas Turbines (Amended 9/20/07) | BAAQMD Rule 9-9 – Nitrogen Oxide from Stationary Gas Turbines (Amended 12/6/06) | RACT/BACT/LAER Clearinghouse (RBLC) |
|--|---|---|---|-------------------------------------|
| <3 MW: gas fuel | Rules 1134/1135: 2.5 ppm (simple cycle NG) Rule 1134: 9 ppm (PG) 12.5 ppm (other) Rule 1109.1: 2 ppm (NG) 3 ppm (other gaseous fuel) | 9 ppm | <0.5 MW units: exempt 42 ppm (natural gas) 50 ppm (RFG, WG, LPG) | 2 ppm (<25 MW non-EGU NG) |
| <3 MW: liquid fuel | ^ | 25 ppm | <0.5 MW units: exempt 65 ppm | - |
| 3-10 MW pipeline turbine: gas fuel* | Rule 1134: 3.5 ppm (gas compressors) | 8 ppm | 25-42 ppm (NG) 50 ppm (RFG, WG, LPG) | 2 ppm (<25 MW non-EGU NG) |
| 3-10 MW pipeline turbine: liquid fuel | ^ | 25 ppm | 65 ppm | - |
| 3-10 MW other turbines (<877 hr/yr): gas fuel | Rule 1134/1135: 2.5 ppm (simple cycle NG) Rule 1134: 9 ppm (PG) 12.5 ppm (other) Rule 1109.1: 2 ppm (NG) 3 ppm (other gaseous fuel) | 9 ppm | 25-42 ppm (NG) 50 ppm (RFG, WG, LPG) | 2 ppm (<25 MW non-EGU NG) |
| 3-10 MW other turbines (<877 hr/yr): liquid fuel | ^ | 25 ppm | 65 ppm | - |
| 3-10 MW other turbines (>877 hr/yr): gas fuel | Rule 1134/1135: 2.5 ppm (simple cycle NG) | 5 ppm | 25-42 ppm (NG) 50 ppm (RFG, WG, LPG) | 2 ppm (<25 MW non-EGU NG) |

| Source Category | South Coast AQMD Rules 1134, 1135, and 1109.1 | SJVAPCD Rule 4703 – Stationary Gas Turbines (Amended 9/20/07) | BAAQMD Rule 9-9 – Nitrogen Oxide from Stationary Gas Turbines (Amended 12/6/06) | RACT/BACT/LAER Clearinghouse (RBLC) |
|--|--|---|---|-------------------------------------|
| | Rule 1134: 9 ppm (PG) 12.5 ppm (other) | | | |
| 3-10 MW other turbines (>877 hr/yr): liquid fuel | ^ | 25 ppm | 65 ppm | - |
| >10 MW simple cycle (<200 hr/yr): gas fuel | Rule 1134/1135: 2.5 ppm (simple cycle NG) Rule 1109.1: 2 ppm (NG) 3 ppm (other gaseous fuel) | 25 ppm | 15 ppm (15 to 25 MW) 9 ppm (>25 to 50 MW) 5 ppm (>50 MW NG) 9 ppm (>50 MW RFG, WG) | 2 ppm (>25 MW) |
| >10 MW simple cycle (<200 hr/yr): liquid fuel | ^ | 42 ppm | 42 ppm (15 to 25 MW) 25 ppm (>25 MW) | 4 ppm (>25 MW EGU, ULSD) |
| >10 MW simple cycle (>200 hr/yr): gas fuel | Rule 1134/1135: 2.5 ppm (NG) Rule 1109.1: 2 ppm (NG) 3 ppm (other gaseous fuel) | 5 ppm | 15 ppm (15 to 25 MW) 9 ppm (>25 to 50 MW) 5 ppm (>50 MW NG) 9 ppm (>50 MW RFG, WG) | 2 ppm (>25 MW) |
| >10 MW simple cycle (>200 hr/yr): liquid fuel | ^ | 25 ppm | 42 ppm (15 to 25 MW) 25 ppm (>25 MW) | 4 ppm (>25 MW EGU ULSD) |
| >10 MW combined cycle/cogeneration: gas fuel | Rule 1134/1135: 2 ppm (NG) Rule 1109.1: 2 ppm (NG) 3 ppm (other gaseous fuel) | 5 ppm (standard compliance) 3 ppm (enhanced compliance) | 15 ppm (15 to 25 MW) 9 ppm (>25 to 50 MW) 5 ppm (>50 MW NG) 9 ppm (>50 MW RFG, WG) | 2 ppm (>25 MW) |
| >10 MW combined cycle/cogeneration: liquid fuel | ^ | 25 ppm | 42 ppm (15 to 25 MW) 25 ppm (>25 MW) | 4 ppm (>25 MW EGU ULSD) |

Abbreviations: EGU – electricity generating unit; NG – natural gas; PG – process gas; RFG – refinery fuel gas; WG – waste gas; LPG – liquefied petroleum gas; ULSD – ultra-low sulfur diesel.

* 12 ppm is the limit under non-steady state operating conditions.

| Source Category | South Coast AQMD Rules 1134, 1135, and 1109.1 | SJVAPCD Rule 4703 – Stationary Gas Turbines (Amended 9/20/07) | BAAQMD Rule 9-9 – Nitrogen Oxide from Stationary Gas Turbines (Amended 12/6/06) | RACT/BACT/LAER Clearinghouse (RBLC) |
|-----------------|---|---|---|-------------------------------------|
|-----------------|---|---|---|-------------------------------------|

^ Rule 1134 disallows the use of liquid fuel in gas turbines except for units located in the outer continental shelf (OCS) or units providing emergency power to a health facility during a natural gas curtailment; Rule 1135 has similar provisions for EGUs during natural gas curtailment. NO_x limits during these periods are specified in the permit.

c. Conclusion

Staff compared South Coast AQMD's NOx emission limits for combustion turbines to those in other air districts, although there were no applicable VOC limits identified for comparison. South Coast AQMD's NOx emission limits are generally the most stringent compared to those in other districts' rules although their stringency varies relative to the RBLC. For example, the RBLC contains a slightly lower limit (2 ppm vs. 2.5 ppm) for non-EGU natural gas simple cycle turbines that are less than 25 MW. On the other hand, Rule 1135 is more stringent than the RBLC because it applies to all EGU turbines and requires NOx limits of 2 ppm and 2.5 ppm for combined and simple cycle turbines, respectively. Rule 1109.1 also requires a 2 ppm NOx limit for all natural gas turbines at refineries. Finally, lowering regulatory limits as a contingency measure would not be appropriate as affected sources would need to design and install advanced emission control technology such as SCR. This feasibility consideration is discussed in further detail in the evaluation section for boilers, steam generators, and process heaters. No contingency measures are proposed for combustion turbines as implementing potential measures within two years is not feasible.

4. Residential and Commercial Fuel Combustion

a. Overview

Source categories 060 – Service and Commercial and 610 – Residential Fuel Combustion consist of several subcategories, including wood combustion and fuel combustion (space heating, water heating, cooking, and other appliances, such as clothes dryers, barbecues, and water heaters used for pools, spas and hot tubs). Major source categories are comprised of combustion appliances or furnaces in commercial and residential buildings that typically burn natural gas. Table 4-11 summarizes VOC and NOx emissions from these sources in the 2037 baseline emissions inventory. Note that residential wood combustion is evaluated separately (see Miscellaneous Processes).

**TABLE 4-11
RESIDENTIAL AND COMMERCIAL FUEL COMBUSTION EMISSIONS BASED ON 2037 SUMMER
PLANNING INVENTORY**

| Source Category | VOC (tpd) | NOx (tpd) |
|--|-------------|--------------|
| 010 – Electric Utilities | 0.00 | 0.00 |
| 020 – Cogeneration | 0.00 | 0.00 |
| 030 – Oil and Gas Production | 0.00 | 0.00 |
| 040 – Petroleum Refining – Space Heating | 0.00 | 0.00 |
| 050 – Manufacturing and Industrial – Space Heating | 0.00 | 0.05 |
| 052 – Food and Agricultural Processing – Space Heating | 0.00 | 0.00 |
| 060-020: Service and Commercial – Space Heating (Natural Gas) | 0.02 | 0.39 |
| 060-020: Service and Commercial – Space Heating (Liquid Petroleum Gas) | 0.00 | 0.00 |
| 060-030: Service and Commercial – Water Heating | 0.08 | 0.42 |
| 610-606: Residential Fuel Combustion – Space Heating (Natural Gas) | 0.19 | 2.01 |
| 610-606: Residential Fuel Combustion – Space Heating (Distillate Oil) | 0.00 | 0.10 |
| 610-608: Residential Fuel Combustion – Water Heating | 0.35 | 1.78 |
| 610-606: Residential Fuel Combustion – Cooking | 0.06 | 1.21 |
| 610-608: Residential Fuel Combustion – Other | 0.23 | 4.29 |
| Total | 0.93 | 10.25 |

In the past, manufacturers of furnaces and water heaters have implemented combustion modifications to meet the NOx limits required in rules by South Coast AQMD and other jurisdictions. This was done using burner designs such as LNBS and ULNBs, incorporating design principles that include staged air burners, staged fuel burners, pre-mix burners, internal recirculation, and radiant burners.

As of April 2025, to follow through on commitments in the 2022 AQMP, South Coast AQMD is proposing to amend its rules to accelerate the transition to zero-emission space and water heaters. The proposed changes would require manufacturers of NOx-emitting units to gradually increase the share of zero-NOx appliances they sell, and pay mitigation fees for each NOx-emitting unit sold. Additionally, existing regulation (Rule 1146.2) requires that certain commercial water heaters must be replaced with zero-emission models once they have reached the end of their useful life. The evaluation presented below considers both on-the-books and on-the-way control measures, consistent with U.S. EPA’s guidance.

b. Evaluation

South Coast AQMD currently has three rules that regulate NOx emissions from residential and commercial water heating (Rules 1121 and 1146.2, respectively) and space heating (Rule 1111). Rule 1121 regulates NOx emissions from residential type, natural gas-fired water heaters with heat input rates less than 75,000 Btu/hr; Rule 1146.2 regulates NOx emissions from small boilers, process heaters, and water heaters including the commercial sector with heat input rates less than or equal to 2,000,000 Btu/hr. Rule 1111 regulates NOx emissions from natural gas-fired furnaces with a heat input rate less than 2,000,000 Btu/hr.

The emission limits for commercial water heaters in Rule 1146.2 are itemized in Table 4-12. Table 4-12 also considers the space and water heater emission limits in Proposed Amended Rules 1111 and 1121 as of April 2025.

**TABLE 4-12
SOUTH COAST AQMD CONTROL MEASURES FOR SPACE AND WATER HEATERS**

| Rule | Applicability | Control Measure |
|---|---|--|
| <p>Proposed Amended Rule 1111 – Reduction of NOx Emissions from Natural-Gas-Fired Furnaces (Adoption TBD)</p> | <p>Natural-gas-fired furnaces used for interior space heating, with a rated heat input of <175,000 Btu/hr or a cooling rate of <65,000 Btu/hr for combination heating and cooling units</p> | <ul style="list-style-type: none"> • Zero emission limits for new installations and existing units upon replacement after the zero emission compliance dates: <ul style="list-style-type: none"> • Residential Fan-Type Central Furnace (Condensing, Non-Condensing, and Weatherized Furnaces) <ul style="list-style-type: none"> New Buildings: 1/1/27 Existing Buildings, excluding mobile homes: 1/1/29 • Wall Furnaces and Floor Furnaces <ul style="list-style-type: none"> New Buildings: 1/1/27 Existing Buildings: 1/1/29 <p>Prior to zero emission compliance dates:</p> <ul style="list-style-type: none"> • 14 ng/joule for both condensing and non-condensing furnaces, weatherized furnaces, and mobile home furnaces <p>Mobile home furnace manufacturer alternative compliance option:</p> <ul style="list-style-type: none"> • 40 ng/joule with a per-unit-pay fee of \$150 until 9/30/25 and 100 on and after 10/1/25 <p>Zero-NOx emission manufacturer (ZEM) alternative compliance options:</p> <ul style="list-style-type: none"> • Sales targets: <ul style="list-style-type: none"> • Phase 1 (2027–2028): 30% zero-NOx units |

| Rule | Applicability | Control Measure |
|--|--|---|
| | | <p>70% NOx-emitting furnaces</p> <ul style="list-style-type: none"> • Phase 2 (2029–2032): 50% zero-NOx units 50% NOx-emitting furnaces • Phase 3 (2033–2035): 75% zero-NOx units 25% NOx-emitting furnaces • Phase 4 (2036 and after): 90% zero-NOx units 10% NOx-emitting furnaces • Mitigation fees: <ul style="list-style-type: none"> • \$100 per furnace sold within the furnace sales target for 2027, adjusted by CPI after 2027 • \$100 per furnace sold above the sales target for 2027, adjusted by CPI after 2027 |
| <p>Proposed Amended Rule 1121 – Reduction of NOx Emissions from Residential Type, Natural Gas-Fired Water Heaters (Adoption TBD)</p> | <p>Small natural gas-fired water heaters rated <75,000 Btu/hr; exemptions:</p> <ul style="list-style-type: none"> • Water heaters subject to Rule 1146.2 • Water heaters used in recreational vehicles • Water heaters in mobile homes (except where specified) • Water heaters to be installed or used in New Buildings with building permits issued prior to date of adoption • Water heaters for installation or in use in Existing Buildings | <ul style="list-style-type: none"> • Zero emission limits for new installations and existing units upon replacement after the zero emission compliance dates • For New Buildings: <ul style="list-style-type: none"> • Water Heater & Mobile Home Water Heater: 1/1/27 • For Existing Buildings: <ul style="list-style-type: none"> • Water Heater: 1/1/29 <p>Prior to zero emission compliance dates:</p> <ul style="list-style-type: none"> • 10 ng NOx/joule or 15 ppm • Gas-fired mobile home water heaters: 40 ng/joule or 55 ppm <p>ZEM alternative compliance options:</p> <ul style="list-style-type: none"> • Sales targets: |

| Rule | Applicability | Control Measure |
|--|--|---|
| | | <ul style="list-style-type: none"> • Phase 1 (2027–2028): 30% zero-NOx units 70% NOx-emitting water heaters • Phase 2 (2029–2032): 50% zero-NOx units 50% NOx-emitting water heaters • Phase 3 (2033–2035): 75% zero-NOx units 25% NOx-emitting water heaters • Phase 4 (2036 and after): 90% zero-NOx units 10% NOx-emitting water heaters • Mitigation fees: <ul style="list-style-type: none"> • \$50 per water heater sold within the sales target for 2027, adjusted by CPI after 2027 • \$250 per water heater sold above the sales target for 2027, adjusted by CPI after 2027 |
| <p>Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters (Amended 6/7/24)</p> | <p>Natural gas-fired water heaters, boilers, and process heaters with a rated heat input >75,000 Btu/hr and ≤2,000,000 Btu/hr</p> | <ul style="list-style-type: none"> • Zero emission limits for new installations and existing units that reach the end of unit age after the zero emission compliance dates <ul style="list-style-type: none"> • Phase I compliance dates: Type 1 units (rated heat input capacity less than or equal to 400,000 Btu/hr, excluding Water Heaters subject to the limits of Rule 1121) and Instantaneous Water Heaters ≤ 200,000 Btu/hr New Buildings: 1/1/26 |

| Rule | Applicability | Control Measure |
|------|---------------|---|
| | | Existing Buildings: 1/1/29 <ul style="list-style-type: none"> • Phase II compliance dates: <ul style="list-style-type: none"> Type 1 pool heaters; Instantaneous Water Heaters > 200,000 Btu/hr; and Type 2 units (greater than 400,000 Btu/hr up to and including 2,000,000 Btu/hr New Buildings: 1/1/28 Existing Buildings: 1/1/31 • Phase III compliance dates: <ul style="list-style-type: none"> Type 1 High Temperature Units and Type 2 High Temperature Units New Buildings: 1/1/29 Existing Buildings: 1/1/33 • Prior to compliance dates, NOx limits of: <ul style="list-style-type: none"> • 14 ng/joule or 20 ppm, excluding pool heaters • 40 ng/joule or 55 ppm for pool heaters |

As summarized in Table 4-12, South Coast AQMD’s current limits range from 10 ng NOx/joule to 40 ng NOx/joule for space and water heaters, with zero emission limits phasing in at future compliance dates. Staff also examined water and space heater emission limits that have been implemented or recommended for implementation in other air districts in Table 4-13.

**TABLE 4-13
OTHER AIR DISTRICTS’ CONTROL MEASURES FOR SPACE AND WATER HEATERS**

| Rule | Applicability | Control Measure |
|--|---|--|
| SJVAPCD Rule 4308 – Boilers, Steam Generators, and Process Heaters - 0.075 MMBtu/hr to | Applies to boilers, steam generators, process heaters and water heaters rated from 0.075 to 2 MMBtu/hr; exemptions: <ul style="list-style-type: none"> • Units installed in manufactured homes • Units installed in recreational vehicles | Pool Heaters using natural gas: <ul style="list-style-type: none"> • ≥0.075 to ≤0.4 MMBtu/hr: 0.068 lb/MMBtu or 55 ppm • >0.4 to <2.0 MMBtu/hr: 0.024 lb/MMBtu or 20 ppm |

| Rule | Applicability | Control Measure |
|--|--|---|
| less than 2.0 MMBtu/hr (Amended 11/14/13) | <ul style="list-style-type: none"> Hot water pressure heaters | <p>All other units using natural gas: 0.024 lb/MMBtu or 20 ppm</p> <p>Units fired on liquid fuel:</p> <ul style="list-style-type: none"> ≥0.075 to ≤0.4 MMBtu/hr: 0.093 lb/MMBtu or 77 ppm >0.4 MMBtu/hr: 0.036 lb/MMBtu or 30 ppm |
| SJVAPCD Rule 4905 – Natural Gas-Fired, Fan-Type Central Furnaces (Amended 3/21/24) | <p>Applies to natural gas-fired, fan-type central furnaces <175,000 Btu/hr and combination heating and cooling units <65,000 Btu/hr;</p> <p>Exemptions:</p> <ul style="list-style-type: none"> Units to be installed with propane conversion kits for propane firing only | <p>Condensing, Non-condensing, Weatherized, and Manufactured Home Units: 14 ng/joule of heat output</p> <p>Emission fee compliance option for manufacturers; fee end date has passed for all unit types except Manufactured Home units with fee end date of 9/30/2025</p> |
| SJVAPCD Rule 4902 – Residential Water Heaters (Certified Water Heaters) (Amended 3/19/09) | <p>Applies to natural gas-fired residential water heaters ≤ 75,000 Btu/hr;</p> <p>exemptions:</p> <ul style="list-style-type: none"> Water heaters >75,000 Btu/hr Water heaters using fuels other than natural gas Water heaters used exclusively in recreational vehicles | <p>Natural gas-fired mobile home water heater: 40 ng NOx/joule of heat output</p> <p>Natural gas-fired pool heater: 40 ng NOx/joule</p> <p>Natural gas-fired water heater (excluding mobile home water heaters, instantaneous water heaters, and pool heaters): 10 ng NOx/joule</p> <p>Natural gas-fired instantaneous residential water heaters: 14 ng NOx/joule</p> |
| SMAQMD Rule 414 – Water Heaters, Boilers and Process Heaters Rated Less Than 1,000,000 Btu per Hour (Amended 10/25/18) | <p>Water Heaters, boilers, or process heaters rated <1 million Btu/hr fired with gaseous or nongaseous fuels;</p> <p>exemptions:</p> <ul style="list-style-type: none"> Water heaters in recreational vehicles Pool/spa heaters <75,000 Btu/hr Water heaters, boiler, and process heaters fired with liquefied petroleum gas Hot water pressure washers fired with gaseous or liquid fuels | <p><75,000 Btu/hr:</p> <ul style="list-style-type: none"> Mobile Home: 40 ng NOx/joule or 55 ppm All others: 10 ng NOx/joule or 15 ppm <p>75,000 to < 400,000 Btu/hr:</p> <ul style="list-style-type: none"> Pool/spa: 40 ng NOx/joule or 55 ppm All others: 14 ng NOx/joule or 20 ppm <p>400,000 to < 1 million Btu/hr:</p> <ul style="list-style-type: none"> All types – 14 ng NOx/joule or 20 ppm |
| BAAQMD Rule 9-6 – Nitrogen Oxides Emissions from | Natural Gas-Fired Water Heaters and Boilers; exemptions: | Natural gas-fired storage tank water heaters ≤75,000 Btu/hr: |

| Rule | Applicability | Control Measure |
|--|---|--|
| <p>Natural Gas-Fired Water Heaters (Amended 3/15/23)</p> | <ul style="list-style-type: none"> Natural gas-fired water heaters and boilers rated > 2 million Btu/hr Natural gas water heaters used in recreational vehicles Water heaters using a fuel other than natural gas <p>Natural gas-fired pool/spa heaters rated <400,000 Btu/hr</p> | <ul style="list-style-type: none"> 10 ng NOx/joule (excludes water heaters used for mobile homes) 0 ng NOx/joule (manufactured after 1/1/27; excludes water heaters used for mobile homes) <p>Natural gas-fired boilers and water heaters >75,000 to 2 million Btu/hr:</p> <ul style="list-style-type: none"> 14 ng NOx/joule 0 ng NOx/joule (manufactured after 1/1/31) <p>Natural gas-fired boilers and water heaters 400,000 to 2 million Btu/hr: 14 ng NOx/joule</p> <p>Natural gas-fired mobile home water heaters: 40 ng NOx/joule</p> <p>Natural gas-fired pool/spa heaters >400,000 to 2 million Btu/hr: 14 ng NOx/joule</p> |
| <p>San Diego Air Pollution Control District (SDAPCD) Rule 69.5.1 – Natural Gas-Fired Water Heaters (Adopted 6/24/15)</p> | <p>Natural Gas-Fired Water Heaters ≤ 75,000 Btu/hr; exemptions:</p> <ul style="list-style-type: none"> Water heaters rated >75,000 Btu/hr Water heaters used in recreational vehicles Water heaters used exclusively to heat swimming pools and hot tubs Water heaters using fuels other than natural gas Instantaneous water heaters | <p>Natural gas-fired water heater (excluding mobile home water heaters): 10 ng NOx/joule or 15 ppm</p> <p>Natural gas-fired mobile home water heater: 40 ng NOx/joule or 55 ppm</p> |
| <p>VCAPCD Rule 74.11 – Natural Gas-Fired Water Heaters (Revised 1/12/10)</p> | <p>Natural Gas-Fired Water Heaters <75,000 Btu/hr; exemptions:</p> <ul style="list-style-type: none"> Water heaters rated >75,000 Btu/hr Natural gas water heaters used in recreational vehicles | <p>Natural gas-fired water heater (excluding mobile home water heaters): 10 ng NOx/joule</p> <p>Natural gas-fired mobile home water heater: 40 ng NOx/joule</p> |
| <p>VCAPCD Rule 74.11.1 – Large Water Heaters and Small Boilers (Revised 9/11/12)</p> | <p>Large Water Heaters and Small Boilers; exemptions</p> | <p>Units rated 75,000 to 400,000 Btu/hr: 14 ng NOx/joule</p> <p>Units rated 400,000 to 1 million Btu/hr: 20 ppm NOx (after 1/1/13)</p> |
| <p>VCAPCD Rule 74.22 – Natural Gas-Fired, Fan-Type Central</p> | <p>Natural Gas-Fired, Fan-Type Central Furnaces; exemptions:</p> <ul style="list-style-type: none"> Units installed in mobile homes | <p>40 ng NOx/joule</p> |

| Rule | Applicability | Control Measure |
|---|--|---|
| Furnaces (Adopted 11/9/93) | | |
| BAAQMD Rule 9-4 – Nitrogen Oxides from Natural Gas-Fired Furnaces (Amended 3/15/23) | Natural gas-fired furnaces rated 175,000 Btu/hr or less | Natural gas-fired fan type central furnace: <ul style="list-style-type: none"> • 40 ng NOx/joule (1984+) • 14 ng NOx/joule (2024+) • 0 ng NOx/joule (manufactured after 1/1/29; excludes space heaters used for mobile homes) |
| CARB Zero-Emission Standard for Space and Water Heaters | Space heaters and water heaters, implementation begins in 2030 | Zero emission standard |
| Other Identified Potential Measures | Residential space and water heating | <ul style="list-style-type: none"> • Develop incentives for early replacement of residential space and water heaters with high-efficiency electric heat pumps or zero-emission heaters • Require that, at replacement, natural gas and propane water or space heaters be replaced with units that run on electricity • Require a zero-NOx appliance standard in existing buildings. <p>Require new residential buildings to be all-electric as currently implemented in 77 jurisdictions across California states³²</p> |

Implementation of CARB’s Zero-Emission Standard for Space and Water Heaters, which is not yet adopted, is scheduled to begin in 2030.³³ BAAQMD’s rules also include zero emission limits for furnaces and water heaters that begin to phase in for new units starting in 2027. South Coast AQMD Rule 1146.2 and Proposed Amended Rules 1111 and 1121 include zero emission limits that phase in from 2027-2033 depending on the type of heater and whether the building is new or existing. Proposed Amended Rules 1111 and 1121 also include an alternative compliance option applicable to manufacturers, establishing zero-NOx emission space and water heating appliance sales targets that gradually increase over time, along with a mitigation fee for NOx-emitting appliances sold. In addition, Rule 1146.2 contains unit age requirements for the replacement of NOx-emitting heaters with zero emission units once they have reached the end of their useful life.

³² J. Gable, Sierra Club, “California’s Cities Lead the Way on Pollution-Free Homes and Buildings,” February 14, 2023. <https://www.sierraclub.org/articles/2021/07/californias-cities-lead-way-pollution-free-homes-and-buildings>

³³ CARB, 2022 State Strategy for the State Implementation Plan, September 22, 2022. https://ww2.arb.ca.gov/sites/default/files/2022-08/2022_State_SIP_Strategy.pdf

c. Conclusion

To follow through on commitments included in the 2022 AQMP, South Coast AQMD is amending its rules to promote zero emission technology for newly sold or installed space and water heaters. As of April 2025, a public hearing has been set for June 6, 2025 to consider adoption of Proposed Amended Rules 1111 and 1121. Since the reductions from these rules are relied upon for attainment of the 2015 ozone NAAQS, there are no surplus reductions to be withheld for contingency measures. According to U.S. EPA's guidance and recent case law, a control measure relied upon for attainment purposes cannot serve as a contingency measure.

In addition to enforcing zero emission sale and installation requirements, South Coast AQMD Rule 1146.2 contains in-use requirements for some commercial water heaters to require their replacement with zero emission appliances once they have reached the end of their useful life. The only potential contingency measure that would be surplus to South Coast AQMD's rules would be to require replacement of existing residential heaters before the end of their useful life. Staff does not consider this to be economically feasible for residential units, especially due to the undue burden it would place on disadvantaged communities. However, South Coast AQMD remains committed to providing resources to residents to facilitate the transition to zero emission heaters. For example, South Coast AQMD recently launched the Go Zero pilot incentive program which provides rebates to residents and small businesses that install zero emission heaters.³⁴ Staff has not identified any feasible controls to propose as contingency measures for this source category.

5. Other Fuel Combustion

a. Overview

There are other gaseous and liquid fuel fired combustion equipment that contribute to fuel combustion emissions. These include, but are not limited to, dryers, kilns, afterburners, evaporators, commercial food ovens, fryers, and burn-off furnaces. Three South Coast AQMD rules – Rule 1147, Rule 1147.1, and Rule 1153.1 – regulate NO_x emissions from these combustion units. Rule 1147 – NO_x Reductions from Miscellaneous Sources (Amended May 6, 2022) establishes BARCT NO_x emission limits from miscellaneous combustion equipment and Rule 1147.1 – NO_x Reductions from Aggregate Dryers (Adopted August 6, 2021) establishes NO_x limits representative of BARCT for gaseous fuel fired aggregate dryers.

In addition, South Coast AQMD regulates commercial food ovens under Rule 1153.1 - Emissions of Oxides of Nitrogen from Commercial Food Ovens (Amended August 4, 2023). Prior to the initial adoption of Rule 1153.1 in 2014, commercial food ovens were regulated under Rule 1147. Rule 1153.1 was originally developed to address the unique challenges specific to commercial food ovens, roasters, and smokehouses.

³⁴ South Coast AQMD, Go Zero Pilot Incentive Program for Zero-NO_x Emission Space and Water Heating Appliances, August 2, 2024. <https://www.aqmd.gov/home/rules-compliance/residential-and-commercial-building-appliances/go-zero>

In 2023, Rule 1153.1 was amended to establish NOx limits, including future zero emission limits for certain categories of commercial food ovens, that reflect BARCT.³⁵

Emissions associated with other fuel combustion units are summarized in Table 4-14.

³⁵ South Coast AQMD Final Staff Report Rule 1153.1, August 4, 2023. <https://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2023/2023-Aug4-022.pdf?sfvrsn=6>

**TABLE 4-14
OTHER FUEL COMBUSTION EQUIPMENT EMISSIONS BASED ON 2037 SUMMER PLANNING
INVENTORY**

| Major Source Category | Process | VOC (tpd) | NOx (tpd) |
|---|--|-------------|-------------|
| 020 – COGENERATION | 995 – OTHER | 0.01 | 0.00 |
| 040 – PETROLEUM REFINING (COMBUSTION) | 070 – IN-PROCESS FUEL | 0.00 | 0.00 |
| 040 – PETROLEUM REFINING (COMBUSTION) | 070 – IN-PROCESS FUEL | 0.06 | 0.15 |
| 050 – MANUFACTURING AND INDUSTRIAL | 012 – OVEN HEATERS (FORCE DRYING SURFACE COATINGS) | 0.00 | 0.00 |
| 050 – MANUFACTURING AND INDUSTRIAL | 012 – OVEN HEATERS (FORCE DRYING SURFACE COATINGS) | 0.00 | 0.04 |
| 050 – MANUFACTURING AND INDUSTRIAL | 070 – IN-PROCESS FUEL | 0.03 | 0.31 |
| 050 – MANUFACTURING AND INDUSTRIAL | 070 – IN-PROCESS FUEL | 0.00 | 0.00 |
| 050 – MANUFACTURING AND INDUSTRIAL | 070 – IN-PROCESS FUEL | 0.00 | 0.00 |
| 050 – MANUFACTURING AND INDUSTRIAL | 070 – IN-PROCESS FUEL | 0.05 | 0.00 |
| 050 – MANUFACTURING AND INDUSTRIAL | 070 – IN-PROCESS FUEL | 0.00 | 0.00 |
| 050 – MANUFACTURING AND INDUSTRIAL | 995 – OTHER | 0.00 | 0.00 |
| 050 – MANUFACTURING AND INDUSTRIAL | 995 – OTHER | 0.19 | 2.15 |
| 050 – MANUFACTURING AND INDUSTRIAL | 995 – OTHER | 0.02 | 0.04 |
| 050 – MANUFACTURING AND INDUSTRIAL | 995 – OTHER | 0.00 | 0.00 |
| 050 – MANUFACTURING AND INDUSTRIAL | 995 – OTHER | 0.00 | 0.73 |
| 052 – FOOD AND AGRICULTURAL PROCESSING | 070 – IN-PROCESS FUEL | 0.00 | 0.00 |
| 052 – FOOD AND AGRICULTURAL PROCESSING | 995 – OTHER | 0.00 | 0.00 |
| 060 – SERVICE AND COMMERCIAL | 012 – OVEN HEATERS (FORCE DRYING SURFACE COATINGS) | 0.00 | 0.00 |
| 060 – SERVICE AND COMMERCIAL | 070 – IN-PROCESS FUEL | 0.00 | 0.04 |
| 060 – SERVICE AND COMMERCIAL | 070 – IN-PROCESS FUEL | 0.00 | 0.01 |
| 060 – SERVICE AND COMMERCIAL | 070 – IN-PROCESS FUEL | 0.00 | 0.00 |
| 060 – SERVICE AND COMMERCIAL | 995 – OTHER | 0.00 | 0.00 |
| 060 – SERVICE AND COMMERCIAL | 995 – OTHER | 0.01 | 0.10 |
| 060 – SERVICE AND COMMERCIAL | 995 – OTHER | 0.24 | 0.57 |
| 060 – SERVICE AND COMMERCIAL | 995 – OTHER | 0.08 | 0.98 |
| 060 – SERVICE AND COMMERCIAL | 995 – OTHER | 1.15 | 3.54 |
| 060 – SERVICE AND COMMERCIAL | 995 – OTHER | 0.00 | 0.00 |
| 099 – OTHER (FUEL COMBUSTION) | 080 – RESOURCE RECOVERY | 0.00 | 0.01 |
| 099 – OTHER (FUEL COMBUSTION) | 995 – OTHER | 0.55 | 0.13 |
| Total | | 2.41 | 8.80 |

b. Evaluation

i. Available Control Technologies

LNB and ULNB are commercially available combustion control technologies and SCR is a post-combustion add-on control technology that is commercially available and commonly employed to control NOx emissions from a wide range of NOx sources. Current NOx limits in Rule 1147 are established between 20 and 60 ppm corrected to 3 percent O2 for most unit categories, although turbines have a NOx limit set at 9 ppm corrected to 15 percent O2. Lower NOx emissions with LNB/ULNB are feasible for burner replacements and new installation. Achieving 20 ppm NOx using LNB/ULNB systems without SCR is feasible in certain applications. Source test data also showed Rule 1147 equipment and burner technology can feasibly achieve between 20 and 30 ppm NOx in existing applications. SCR systems typically require minimum exhaust temperatures of about 500°F, and many applications subject to Rule 1147 would need the installation of additional heat input devices, such as duct burners, to achieve SCR minimum exhaust temperatures. Duct burner installation would lower the system's overall reduction potential and raise NOx emissions at the SCR's inlet. Additionally, according to vendor quotations, adding duct burners would raise the control system's total cost. Current Rule 1147 NOx limits can be feasibly achieved with burner only control technologies.³⁶

The NOx limit for aggregate dryers in Rule 1147.1 is set at 30 ppm. Based on discussions with burner manufacturers, 25 ppm NOx is difficult to achieve in existing facilities due to limited excess air required for low NOx burners, while 30 ppm is achievable for most retrofit applications. Source test data also suggested existing equipment and burner technology can feasibly achieve 30 ppm NOx. Therefore, staff finalized NOx limits at 30 ppm in Rule 1147.1.³⁷ SCR is often infeasible for aggregate dryers due to low exhaust temperatures (refer to details above).

Rule 1153.1 applies to commercial food ovens with a rated heat input capacity equal to or greater than 325,000 Btu/hr which are used to prepare food or products for human consumption. Commercial food ovens include bakery ovens, cooking ovens, dryers, drying ovens, roasters, smokehouses, and tortilla ovens. The most frequently used option to reduce NOx emissions from commercial food ovens is by replacing the burner system with newer LNB technology. In some situations, burners installed within the last 10 years may potentially be tuned and optimized to reduce NOx formation rather than undergoing a complete

³⁶ South Coast AQMD, Final Staff Report for Proposed Amended Rule 1147 – NOx Reductions from Miscellaneous Sources, May 2022. <https://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2022/2022-May6-029.pdf?sfvrsn=6>

³⁷ South Coast AQMD, Final Staff Report for Proposed Rule 1147.1 – NOx Reductions from Aggregate Dryers, August 2021. <https://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-Aug6-028.pdf?sfvrsn=6>

burner replacement, which will result in cost savings for the facilities. Similar to other combustion equipment in this source category, the process temperature of most food ovens is too low for SCR.³⁸

The BARCT assessment performed for Rule 1153.1 identified several categories of commercial food ovens where zero emission technology is commercially available. Commercial bakery ovens were subcategorized based on oven type and unit size and separated into direct-fired and indirect-fired bakery ovens. The direct-fired bakery oven category was further separated based on unit size: greater than 3 MMBtu/hr and less than or equal to 3 MMBtu/hr, with a future zero emission compliance date for units less than 3 MMBtu/hr. The 3 MMBtu/hr threshold is equivalent to approximately 900 kilowatts of electrical power demand, and was set because any commercial bakery oven requiring more than 1 megawatt of power would require further evaluation of the electrical grid capacity for the surrounding area of the facility, and additional time to accommodate necessary upgrades.³⁹ Several manufacturers already offer electric oven options, but they are not widely used at this time. As regulatory agencies and companies who operate large commercial food ovens work to lower emissions, more zero emission commercial oven installations are anticipated.

ii. South Coast AQMD Control Measures

Table 4-15 summarizes NOx emission limits in Rule 1147.

**TABLE 4-15
NOX EMISSION LIMITS FOR COMBUSTION EQUIPMENT CATEGORIES IN RULE 1147**

| Equipment Categories | Process Temperature | Emission Limits (corrected to 3% O ₂ , dry) |
|---|---------------------|--|
| Gaseous Fuel Fired Equipment ¹ | | |
| Afterburner, Degassing Unit, Thermal Oxidizer, Catalytic Oxidizer or Vapor Incinerator | All | 20 ppm or 0.024 lb/MMBtu |
| Remediation Unit | All | 60 ppm or 0.073 lb/MMBtu |
| Burn-off Furnace, Burnout Oven, Incinerator or Crematory with or without Integrated Afterburner | All | 30 ppm or 0.036 lb/MMBtu |
| Evaporator, Fryer, Heated Process Tank, or Parts Washer | All | 60 ppm or 0.073 lb/MMBtu |

³⁸ South Coast AQMD, Final Staff Report for Proposed Rule 1153.1 – Emissions of Oxides of Nitrogen from Commercial Food Ovens, August 4, 2023. <https://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2023/2023-Aug4-022.pdf?sfvrsn=6>

³⁹ During the rule amendment process for South Coast AQMD Rule 1153.1, Southern California Edison (SCE) advised staff that any commercial bakery oven requiring more than one MW of power would require further evaluation of the electrical grid capacity for the surrounding area of the facility and more than likely require additional time to accommodate necessary upgrades. Final Staff Report for Proposed Rule 1153.1 – Emissions of Oxides of Nitrogen from Commercial Food Ovens, August 4, 2023. <https://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2023/2023-Aug4-022.pdf?sfvrsn=6>

| Equipment Categories | Process Temperature | Emission Limits (corrected to 3% O ₂ , dry) |
|---|---------------------|--|
| Oven, Dehydrator, Dryer, Heater, Kiln, Calciner, Cooker, Roaster, Furnace, or Heated Storage Tank | <1,200°F | 20 ppm or 0.024 lb/MMBtu |
| | ≥1,200°F | 30 ppm or 0.036 lb/MMBtu |
| Make-Up Air Heater or other Air Heater located outside of building with temperature-controlled zone inside building | All | 30 ppm or 0.036 lb/MMBtu |
| Tenter Frame or Fabric or Carpet Dryer | All | 20 ppm or 0.024 lb/MMBtu |
| Autoclave | All | 30 ppm or 0.036 lb/MMBtu |
| Tunnel Kiln or Beehive Kiln | <1,200°F | 30 ppm or 0.036 lb/MMBtu |
| | ≥1,200°F | 60 ppm or 0.073 lb/MMBtu |
| Chiller (Absorption or Adsorption) | All | 20 ppm or 0.024 lb/MMBtu |
| Turbine <0.3 MW ² | All | 9 ppm or 0.033 lb/MMBtu |
| Rotary Dryer | All | 30 ppm or 0.036 lb/MMBtu |
| Other Unit or Process Temperature | <1,200°F | 30 ppm or 0.036 lb/MMBtu |
| | ≥1,200°F | 60 ppm or 0.073 lb/MMBtu |
| Liquid Fuel Fired Equipment | | |
| All liquid fuel-fired Units ² | <1,200°F | 40 ppm or 0.053 lb/MMBtu |
| | ≥1,200°F | 60 ppm or 0.073 lb/MMBtu |

¹ Emission limit applies to burners in Units fueled by 100% natural gas that are used to incinerate air toxics, VOC, or other vapors; or to heat a Unit. The emission limit applies solely when burning 100% gaseous fuel and not when the burner is incinerating air toxics, VOC, or other vapors. The Unit shall be tested or certified to meet the emission limit while fueled with natural gas.

² Emission limits in ppm for Turbines are corrected to 15% O₂, dry basis.

Rule 1147.1 requires that aggregate dryers achieve a NO_x limit of 30 ppm at 3 percent O₂ dry. The compliance schedule depends on the age of the burner and current permit conditions.

Table 4-16 summarizes NO_x emission limits in Rule 1153.1.

TABLE 4-16
NOX EMISSION LIMITS FOR COMBUSTION EQUIPMENT CATEGORIES IN RULE 1153.1

| Equipment Categories | Process Temperature | Phase I NOx Emission Limits ¹ | Phase II NOx Emission Limits ¹ |
|-----------------------------|-----------------------------------|--|---|
| | | | |
| Direct-Fired Bakery Ovens | ≤3 MMBtu/hr | 30 | 0 |
| | >3 MMBtu/hr | 30 | N/A |
| Indirect-Fired Bakery Ovens | All | 30 | 0 |
| Griddle Ovens | All | 30 | N/A |
| Tortilla Ovens | Heated solely by infrared burners | 15 | N/A |
| | All others | 30 | N/A |
| Cooking Ovens | ≤3 MMBtu/hr | 30 | 0 |
| | >3 MMBtu/hr | 30 | N/A |
| Drying Ovens | All | 30 | N/A |
| Smokehouses | All | 30 | 0 |
| Dryers | All | 30 | N/A |
| Roasters | All | 30 | N/A |

¹Emission limits are in ppm corrected to 3% O₂, dry.

iii. Review of Control Measures in Other Jurisdictions

Other analogous rules adopted by other air districts include SJVAPCD Rules 4309 and 4313, VCAPCD Rule 74.34, and SMAQMD Rule 419. These rules are summarized in Table 4-16 for comparison.

TABLE 4-16
OTHER AIR DISTRICTS' CONTROL MEASURES FOR OTHER FUEL COMBUSTION

| Rule | Applicability | Control Measure | | |
|---|---|---|--------------------|-------------------|
| | | NOx Limit (ppm, corrected to 19% O ₂) | | |
| SJVAPCD Rule 4309 – Dryers, Dehydrators, and Ovens (Adopted 12/15/05) | Any dryer, dehydrator, or oven that is fired on gaseous fuel, liquid fuel, or is fired on gaseous and liquid fuel sequentially, and the total rated heat input for the unit is ≥5.0 MMBtu/hr. Exempts smokehouses, roasting | | Gaseous Fuel Fired | Liquid Fuel Fired |
| | | Asphalt/Concrete Plants | 4.3 | 12.0 |
| | | Milk, Cheese, and Dairy Processing <20 MMBtu/hr | 3.5 | 3.5 |
| | | Milk, Cheese, and Dairy Processing ≥20 MMBtu/hr | 5.3 | 5.3 |
| | | Other processes not described above | 4.3 | 4.3 |

| Rule | Applicability | Control Measure | | | |
|--|--|--|------------------------------|------------------------------|--|
| | units, and units used to bake or fry food for human consumption | | | | |
| SJVAPCD Rule 4313 – Lime Kilns (Adopted 3/27/03) | Lime kilns | Gaseous Fuel: 0.10 lb/MMBtu of NOx Distillate Fuel: 0.12 lb/MMBtu of NOx Residual Fuel Oil: 0.20 lb/MMBtu of NOx | | | |
| VCAPCD Rule 74.34 – NOx Reductions from Miscellaneous Sources (Adopted 12/13/16) | Dryers, furnaces, heaters, incinerators, kilns, ovens, and duct burners where the total rated heat input for the unit is ≥5.0 MMBtu/hr | NOx Emission Limits (ppm, corrected to 3% O2) | | | |
| | | Asphalt Manufacturing (Dryers) | 40 or 0.048 lb/MMBtu | | |
| | | Sand & Gravel Processing (Dryers) | 40 or 0.048 lb/MMBtu | | |
| | | Paper Products Manufacturing (Hot Air Furnace, Duct Burner, Paper Dryer) | 40 or 0.048 lb/MMBtu | | |
| | | Metal Heat Treating/ Metal Melting Furnace | 60 or 0.072 lb/MMBtu | | |
| | | Kiln | 80 or 0.096 lb/MMBtu | | |
| | | | Process Temperature <1,200°F | Process Temperature ≥1,200°F | |
| | | Oven, Dryer (besides asphalt, sand or paper dryer), Heater, Incinerator, Other Furnaces, or Other Duct Burner | 30 or 0.036 lb/MMBtu | 60 or 0.072 lb/MMBtu | |
| SMAQMD Rule 419 – NOx from Miscellaneous Combustion Units (Amended 10/25/18) | Any miscellaneous combustion or cooking unit with a total rated heat input capacity of 2 million Btu/hr or greater located at a major stationary source of NOx, or 5 million Btu/hr or greater not located at a major stationary source of NOx | NOx Emission Limits (ppm, corrected to 3% O2) | | | |
| | | Gaseous Fuel-Fired Equipment | | | |
| | | | Process Temperature <1,200°F | Process Temperature ≥1,200°F | |
| | | Asphalt Manufacturing Operation | 40 | 40 | |
| | | Incinerator or Crematory | 60 | 60 | |
| | | Metal Heat Treating or Metal Melting Furnace | 30 | 60 | |
| | | Other Furnace | 30 | 60 | |
| | | Oven, Dehydrator, Dryer, Heater, or Kiln | 30 | 60 | |
| | | Soybean Roaster | 45 | 60 | |
| | | Other Miscellaneous Combustion units not listed | 30 | 60 | |
| Liquid-Fuel Fired Equipment | | | | | |

| Rule | Applicability | Control Measure | | |
|------|---------------|---|----------------------------|----------------------------|
| | | All miscellaneous combustion units when liquid fuel-fired | 40 | 60 |
| | | | Process Temperature <500°F | Process Temperature ≥500°F |
| | | Cooking Unit | 40 | 60 |

SJVAPCD Rule 4309 contains NOx limits between 3.5 to 5.3 ppm corrected to 19 percent O2 which are between 32 and 50 ppm NOx corrected to 3 percent O2. Rule 4309 has no separate emission limits based on process temperature, so comparable NOx emission limits may be more or less stringent compared to existing South Coast AQMD Rule 1147 depending on the process and temperature. SJVAPCD Rule 4313 has an emission limit of 0.10 lb/MMBtu of NOx from gaseous fuel fired lime kilns which is higher than South Coast AQMD Rule 1147’s NOx limits for kilns that range from 0.024 to 0.036 lb/MMBtu depending on the process temperature.

VCAPCD Rule 74.34 establishes a NOx emission limit of between 30 to 80 ppm corrected to 3 percent O2 for any natural gas fired combustion unit where the unit total heat input is greater than or equal to 5 MMBtu/hr. Similar to South Coast AQMD Rule 1147, VCAPCD Rule 74.34 separates emission limits for ovens, dryers, heaters, incinerators, furnaces and duct burners depending on process temperature. Units operating below 1,200°F are limited to 30 ppm NOx while those operating above or equal to 1,200°F are limited to 60 ppm NOx. VCAPCD also contains separate limits for kilns of 80 ppm as well as separate limits for paper product manufacturing and aggregate processes limited to 40 ppm NOx. VCAPCD Rule 74.34 NOx limits are generally less stringent than existing Rule 1147 requirements and Rule 1147.1 requirement for the aggregate dryer category. For example, the NOx limit for aggregate dryers is 40 ppm in VCAPCD Rule 74.34 while the limit is 30 ppm in Rule 1147.1. The NOx limits for ovens, dryers, heaters, and furnaces range from 30 to 60 ppm in VCAPCD Rule 74.34, whereas those limits range from 20 to 30 ppm in Rule 1147.

Rule 1153.1 establishes NOx emission limits in two phases. Phase I establishes a NOx limit of 15 ppm for tortilla ovens heated solely by infrared burners and a NOx limit of 30 ppm for all other commercial food oven categories. Permits for applicable burners were due on July 1, 2024. Phase II establishes zero emission limits for bakery ovens and cooking ovens rated less than or equal to three million Btu per hour, indirect-fired bakery ovens, and smokehouses. For any unit that is 25 years of age or older, and the burner is 10 years of age or older as of January 1, 2027, the operator must decommission the unit by January 1, 2027. For any unit that is less than 25 years of age or the burner is less than 10 years of age as of January 1, 2027, the operator must decommission the unit by January 1 after the end of the calendar year when the unit becomes 25 years of age or older. However, after January 1, 2036, the operator is required to decommission the unit once it reaches 25 years of age, regardless of burner age. An alternative compliance

pathway is available to facilities if the utility company is unable to provide the necessary power to operate the zero emission unit.

Most other air districts either include exemptions or allow higher NOx limits for commercial food ovens. For example, SJVAPCD Rule 4309 exempts smokehouses, roasting units, and units used to bake or fry food for human consumption from being subject to NOx limits. Meanwhile, VCAPCD Rule 74.34 establishes a NOx limit of 30 ppm, but it only applies to ovens with a total rated heat input of 5.0 MMBtu/hr or greater. Although food ovens are subject to SMAQMD Rule 419, the NOx emission limits are 40 (60) ppm for ovens with process temperatures below (above) 500°F. In comparison, South Coast AQMD Rule 1153.1 phase I establishes a 30 ppm NOx limit for all cooking equipment categories except tortilla ovens heated by infrared burners, which are subject to an even more stringent NOx limit of 15 ppm. In addition, phase II of Rule 1153.1 sets a compliance schedule for zero emissions cooking equipment to be implemented based on unit and burner age. Overall, South Coast AQMD enforces the most stringent NOx limits for commercial food ovens and is the only district to implement future zero emissions limits.

c. Conclusion

A review of control measures for dryers, kilns, afterburners, evaporators, ovens, fryers, burn-off furnaces and other types of fuel combustion equipment found that Rules 1147, 1147.2, and 1153.1 generally contain the most stringent NOx limits. Nevertheless, staff considered several potential measures such as lowering NOx limits using ULNB and SCR, but these were not suitable contingency measures considering that it would be technologically infeasible to design, install and operate advanced emission control technology within two years of the triggering event. In addition, SCR is not an appropriate control method for units with low exhaust temperatures. South Coast AQMD's rules as well as regulations in other jurisdictions do not enforce VOC emission limits for this source category. Therefore, staff does not propose any contingency measures for this category of units.

Waste Disposal

a. Overview

Waste Disposal categories in the Basin emissions inventory include 110 – Sewage Treatment, 120 – Landfills, 130 – Incinerators, 140 – Soil Remediation, and 199 – Other (Waste Disposal). Collectively, these source categories account for 18.22 tpd of VOC and 1.68 tpd of NOx in the 2037 Basin emissions inventory as presented in Table 4-17. These emissions are contributed by landfill flares, composting, and incinerators. Flare emissions under the waste disposal source categories are predominately generated by landfill flares. Smaller quantities of emissions are generated by sewage treatment and incineration flares combusting digester gas, process gas, waste gas, and natural gas. Composting emissions are generated by the decomposition of organic materials. Incinerator emissions are primarily generated by waste disposal activities in the industrial sector and involve combustion of distilled oil, liquified petroleum gas, natural gas, pathological waste and waste gas.

**TABLE 4-17
WASTE DISPOSAL EMISSIONS BASED ON 2037 SUMMER PLANNING INVENTORY**

| Industry | VOC (tpd) | NOx (tpd) |
|------------------------------|--------------|-------------|
| 110 – Sewage Treatment | 0.31 | 0.00 |
| 120 – Landfills | 9.72 | 0.42 |
| 130 – Incinerators | 0.04 | 1.25 |
| 140 – Soil Remediation | 0.00 | 0.00 |
| 199 – Other (Waste Disposal) | 8.14 | 0.01 |
| Total¹ | 18.22 | 1.68 |

¹Values may not sum due to rounding.

b. Evaluation

1. Landfills

The evaluation of control measures for flares, including landfill flares, is provided in the Petroleum Production and Marketing Section of this document. This evaluation focuses on control measures for landfill equipment other than flares. Landfill emissions are subject to Title 40 Code of Federal Regulations (CFR) Part 60, Subparts Cc and Cf – Emission Guidelines and Compliance Times for MSW Landfills and Subparts WWW and XXX – Standards of Performance for Municipal Solid Waste Landfills.⁴⁰ South Coast AQMD implements these provisions via Rule 1150.1 – Control of Gaseous Emissions from Municipal Solid Waste Landfills that regulates VOC and toxic air contaminant (TAC) emissions, and methane from Municipal Solid Waste (MSW) landfills through the use of active control and collection systems. This rule was last amended in 2011 to adopt CARB statewide requirements for landfills and does not include NOx control measures.⁴¹

Existing regulations for landfill emissions sources in other jurisdictions include BAAQMD Rule 8-34 – Solid Waste Disposal Sites, Mojave Desert Air Quality Management District (MDAQMD) Rule 1126 – Municipal Solid Waste Landfills, and SJVPACD Rule 4642 – Solid Waste Disposal Sites. These rules have requirements for the collection and destruction of landfill gases from solid waste disposal sites and align with federal requirements. Table 4-18 compares South Coast AQMD landfill emissions measures with existing rules. Current limits in the Basin are as stringent as those in place in other jurisdictions.

⁴⁰ Title 40, Code of Federal Regulations Part 60 (40 CFR 60) Subparts Cc, Cf, WWW, and XXX.
<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60?toc=1>

⁴¹ Title 17, California Code of Regulations, Article 4, and Subarticle 6

**TABLE 4-18
COMPARISON OF EXISTING CONTROL MEASURES FOR LANDFILLS**

| Rule Element | South Coast AQMD Rule 1150.1 – Control of Gaseous Emissions from Municipal Solid Waste Landfills (Amended 4/1/11) | BAAQMD Rule 8-34 – Solid Waste Disposal Sites (Amended 6/15/05) | MDAQMD Rule 1126 – Municipal Solid Waste Landfills (Amended 1/24/22) | SJVAPCD Rule 4642 – Solid Waste Disposal Sites (Amended 4/16/98) |
|---------------|---|---|--|---|
| Applicability | All MSW landfills | Solid Waste Disposal Sites | All MSW landfills where the construction, reconstruction, or modification was commenced before May 30, 1999 and has not been modified since or was commenced before July 18, 2014, but on or after May 30, 1991; and the MSW landfill has accepted waste at any time since November 8, 1987 or has additional design capacity available for future waste deposition. | Any solid waste disposal sites which have a gas collection system and/or control device in operation, or are undergoing maintenance or repair |

| Rule Element | South Coast AQMD Rule 1150.1 – Control of Gaseous Emissions from Municipal Solid Waste Landfills (Amended 4/1/11) | BAAQMD Rule 8-34 – Solid Waste Disposal Sites (Amended 6/15/05) | MDAQMD Rule 1126 – Municipal Solid Waste Landfills (Amended 1/24/22) | SJVAPCD Rule 4642 – Solid Waste Disposal Sites (Amended 4/16/98) |
|-----------------|---|---|---|---|
| Control Measure | <ul style="list-style-type: none"> Gas control system that reduces methane by at least 99%, reduces VOC by at least 98%, and prevents emissions from exceeding 500 ppm | <ul style="list-style-type: none"> Gas collection system operated so that landfill surface VOC and methane emissions do not exceed 500 ppm Control device achieves destruction efficiency of at least 98% | <ul style="list-style-type: none"> Gas collection system operated so that landfill surface emissions do not exceed 500 ppm Control system operates to reduce VOC by 98% | <ul style="list-style-type: none"> Gas collection system operates so that landfill surface VOC and methane emissions do not exceed 1,000 ppm Control device achieves a VOC destruction efficiency of at least 98%, or reduces VOC to 20 ppm or less |

2. Sewage Treatment

The emissions from this source category are associated with the treatment of liquid waste, regulated under Rule 1179 – Publicly Owned Treatment Works (POTWs). For an evaluation of combustion emissions from boilers, turbines, and engines at POTWs regulated under Rule 1179.1 – Emission Reductions from Combustion Equipment at Publicly Owned Treatment Works (POTWs), refer to the fuel combustion section in this chapter.

South Coast AQMD regulates VOC emissions from sewage treatment through Rule 1179. Rule 1179 does not specify VOC emission limits or require controls, but requires POTWs with a design capacity of at least 10 million gallons per day to submit and implement an Emissions Inventory Plan. The only other regulation identified as comparable to South Coast AQMD Rule 1179 is AVAQMD Rule 1179 which has identical requirements. This indicates that Rule 1179 does not contain an opportunity for further emission reductions to serve as a contingency measure.

3. Composting

Composting is a process in which solid organic waste materials are decomposed in the presence of oxygen under controlled conditions through the action of bacteria and other microorganisms. Composting operations occur at facilities that process greenwaste, biosolids, manure, and/or foodwaste. Greenwaste composting means composting of greenwaste by itself or as a mixture with foodwaste, or with up to 20 percent manure, per pile volume basis. Agricultural composting is conducted in agricultural settings where the feedstock consists of wastes generated on-site by the production and processing of farm or agricultural products. While there are no NO_x emissions associated with composting in the Basin, 8.06 tpd of VOC are emitted and the remainder of this evaluation focuses on those emissions.

South Coast AQMD's Rule 1133 series contains requirements to reduce VOC emissions due to the decomposition of organic materials. In addition, Rule 223 – Emission Reduction Permits for Large Confined Animal Facilities includes composting and VOC control devices as class two mitigation measure options for confined animal operations. Staff evaluated regulations for composting in other jurisdictions. Table 4-19 compares South Coast AQMD composting measures with SJVAPCD Rule 4566 – Organic Material Composting, SJVAPCD Rule 4565 – Biosolids, Animal Manure, and Poultry Litter Operations, SJVAPCD Rule 4570 – Confined Animal Facilities, Antelope Valley Air Quality Management District (AVAQMD) Rule 1133 – Composting and Related Operations, and Imperial County Air Pollution Control District (ICAPCD) Rule 430 – Composting Operations.

**TABLE 4-19
COMPARISON OF CONTROL MEASURES FOR COMPOSTING**

| Rule | Applicability | Requirements |
|---|--|---|
| South Coast AQMD Rule 1133.1 – Chipping and Grinding Activities (Amended 7/8/11) | Chipping and grinding activities to produce materials other than active or finished compost | <ul style="list-style-type: none"> • Chip or grind and utilize on-site or remove curbside, non-curbside, or mixed greenwaste from the site within 48 hours of receipt • Foodwaste cannot be processed at the facility unless approved by the Local Enforcement Agency |
| South Coast AQMD Rule 1133.2 – Emission Reductions from Co-Composting Operations (Adopted 1/10/03) | Co-composting operations, defined as those where biosolids and/or manure are mixed with bulking agents to produce compost | <ul style="list-style-type: none"> • Utilize an enclosure that meets the following requirements: has an inward face velocity of at least 100 ft/min; area of all openings cannot exceed 2% of the enclosure’s surface area; and no measurable increase in NH3 or hydrocarbons above background levels outside the enclosure • Conduct all curing under negative pressure • Exhaust from the enclosure must be vented to an emission control device of at least 80% efficiency for VOC and NH3 removal • Alternatively, new co-composting operations can submit a compliance plan demonstrating an overall reduction in VOC and NH3 emissions of at least 80%. The facilities would not have to comply with the above requirements |
| South Coast AQMD Rule 1133.3 – Emission Reductions from Greenwaste Composting Operations (Adopted 7/8/11) | Greenwaste composting operations that produce active or finished compost from greenwaste by itself or greenwaste in combination with manure or foodwaste | <ul style="list-style-type: none"> • Use foodwaste for on-site composting within 48 hours of receipt or cover foodwaste with screened or unscreened finished compost <p>For greenwaste composting operations processing greenwaste only or up to 20 percent manure, or up to 5,000 tons per year of foodwaste:</p> <ul style="list-style-type: none"> • Cover active phase piles with at least 6 inches of finished compost within 24 hours of pile formation • For the first 15 days, apply water such that the top half of the pile is wet at a depth of at least 3 inches <p>For greenwaste composting operations processing greater than 5,000 tons per year of foodwaste:</p> |

| Rule | Applicability | Requirements |
|---|---|---|
| | | <ul style="list-style-type: none"> Active compost containing more than 10% foodwaste must employ an emission control device with at least 80% control efficiency for VOC and NH3 emissions |
| <p>South Coast AQMD Rule 223 – Emission Reduction Permits for Large Confined Animal Facilities (Adopted 6/2/06)</p> | <p>Applies to dairies with ≥1,000 cows and poultry farms with ≥650,000 chickens</p> | <p>If composting is selected as a mitigation measure:</p> <ul style="list-style-type: none"> Employ an aerated static pile vented to a control device with at least 80% control efficiency Compost in accordance with the requirements in Rule 1133.2 |
| <p>SJVAPCD Rule 4566 – Organic Material Composting (Adopted 8/18/11)</p> | <p>Composting facilities that compost and/or stockpile organic material</p> | <p>For stockpiles:</p> <ul style="list-style-type: none"> Cover the organic material for active compost phase with a waterproof cover that have at least a 6 feet overlap of adjacent sheets and be securely anchored within 10 days if a total throughput of less than 100,000 tons per year, or within three days if throughput is greater than 100,000 tons per year <p>For a composting operation:</p> <ul style="list-style-type: none"> With a total throughput of less than 200,000 tons per year of organic material, for windrow composting only implement at least three turns during the active phase and one mitigation measure for the Watering Systems or an approved alternative mitigation measure that demonstrates at least 19% VOC reductions With throughput of greater than or equal to 200,000 and less than 750,000 tons per year, for windrow composting only implement at least three turns during the active phase, one mitigation measure for the Watering Systems, and the finished compost cover mitigation measure, or an approved alternative mitigation measure that demonstrates at least 60% VOC reductions With a total throughput of greater than or equal to 750,000 tons per year, implement an approved mitigation measure that demonstrates at least 80% reduction in VOC emissions during the active phase |

| Rule | Applicability | Requirements |
|--|--|--|
| SJVAPCD Rule 4565 – Biosolids, Animal Manure, and Poultry Litter Operations (Adopted 3/15/07) | Applies to operations that landfill, land apply, compost, or co-compost biosolids, animal manure, or poultry litter | <ul style="list-style-type: none"> • Within 24 hours of receipt at the facility, landfills with biosolids, animal manure, or poultry litter shall be covered with 6 inches of compost, soil, or a waterproof covering • For throughputs of less than 100,000 tons per year, implement class one mitigation measures for co-composting operations • For throughputs of greater than 100,000 tons per year, implement class one mitigation measures and one class two measure for co-composting operations with at least 80% control efficiency |
| SJVAPCD Rule 4570 – Confined Animal Facilities (Amended 10/21/10) | Applies to dairies with ≥500 cows and poultry farms with ≥400,000 chickens | If composting is selected as a mitigation measure: <ul style="list-style-type: none"> • Employ an aerated static pile vented to a control device with at least 80% control efficiency |
| Antelope Valley Air Quality Management District (AVAQMD) Rule 1133 – Composting and Related Operations (Adopted 3/17/09) | Applies to new and existing chipping and grinding activities, and new and existing composting and related operations | <ul style="list-style-type: none"> • Remove foodwaste from the site or use foodwaste for on-site composting within two days of receipt • Chip or grind, or use on-site, or remove: <ul style="list-style-type: none"> ○ Curbside greenwaste from the site within three days of receipt ○ Non-curbside greenwaste from the site within 14 days of receipt ○ Mixed greenwaste from the site within seven days of receipt • Remove chipped or ground curbside greenwaste from the site or use on-site within three days of being chipped and ground |
| Imperial County Air Pollution Control District (ICAPCD) Rule 430 – Composting Operations (Adopted 12/22/20) | New and existing Composting and Co-Composting operations | <ul style="list-style-type: none"> • Facilities engaged in composting/co-composting operations required to select from a menu of mitigation options involving treatment of compost piles and manure management. • Facilities with throughput of at least 100,000 tons per year required to implement additional measure for either active or curing composting <ul style="list-style-type: none"> ○ Conduct all active or all curing composting in aerated static pile or in-vessel composting system vented to a VOC emission control device with a VOC control efficiency of at least 80%, or implement alternate mitigation measure that demonstrates at least an 80% VOC reduction |

South Coast AQMD Rule 1133.3 requires food waste to be composted or covered within two days, whereas SJVAPCD Rule 4566 allows three or 10 days, depending on throughput. Under Rule 1133.3, facilities that process more than 5,000 tons of food waste per year, where the active compost contains more than 10 percent food waste, must employ an emission control device with at least 80 percent control efficiency for VOC emissions. In comparison, SJVAPCD Rule 4566 only requires facilities that process over 750,000 tons per year to demonstrate VOC reductions of at least 80 percent during the active phase. SJVAPCD Rule 4565 requires implementation of a class two mitigation measure that demonstrates a VOC control efficiency of 80 percent during the active phase of composting for facilities that process biosolids, animal manure, or poultry litter with throughputs of at least 100,000 tons per year. South Coast AQMD Rules 1133.2 and 223 also require 80 percent control efficiency. Overall, South Coast AQMD requirements for composting are as stringent or more stringent than those in SJVAPCD Rules 4565 and 4566.

SJVAPCD Rule 4570 and South Coast AQMD Rule 223 both provide a list of mitigation measures for operators of confined animal facilities to choose from and include composting as an option. SJVAPCD Rule 4570 has more stringent applicability thresholds than South Coast AQMD Rule 223 (1,000 dairy cows vs. 500 dairy cows and 650,000 birds vs. 400,000 birds). Rule 223 is currently undergoing an amendment process to align with the more stringent thresholds in SJVAPCD Rule 4570. This will be discussed in more detail under the Miscellaneous Processes – Farming Operations section.

AVAQMD Rule 1133 regulates emissions of VOC and NH₃ from composting and related operations and prevents inadvertent decomposition from occurring during chipping and grinding operations. AVAQMD Rule 1133 requirements include chipping, grinding, or removal of curbside greenwaste from the site within three days, non-curbside greenwaste within 14 days, and mixed greenwaste from the site within seven days of receipt. South Coast AQMD Rule 1133.1 has more stringent requirements than AVAQMD for chipping and grinding, where operators must chip or grind and utilize on-site or remove curbside, non-curbside, or mixed greenwaste from the site within two days of receipt.

ICAPCD Rule 430 regulates VOC and NH₃ emissions from composting, co-composting and related operations involving animal manure and poultry litter. ICAPCD Rule 430 requires operators to select from a menu of mitigation options involving treatment of compost piles and manure management. South Coast AQMD Rule 1133.2 establishes performance standards for operations to achieve at least 70 percent and 80 percent control efficiency for VOC and NH₃ emissions for existing and new operations, respectively. South Coast AQMD Rule 1133.3 requires emission control devices and establishes Best Management Practices (BMPs) for greenwaste composting operations based on the amount of foodwaste a facility processes. Therefore, staff concludes that South Coast AQMD's rules for composting are more stringent than the composting measures in ICAPCD Rule 430.

South Coast AQMD's rules are as stringent as, if not more stringent than, other districts' rules and no contingency measure opportunities were identified.

4. Incinerators

Incinerators are used to burn waste material at high temperatures until reduced to ash. There are three MSW incinerators in the Basin, all located at the City of Long Beach’s Southeast Resource Recovery Facility (SERRF). The 2022 AQMP included control measure L-CMB-09: NO_x Reductions from Incinerators to reduce NO_x emissions by replacing or retrofitting incinerators and other combustion equipment associated with incinerators with zero and low NO_x emission technologies. The South Coast Air Basin Attainment Plan for the 2012 Annual PM_{2.5} Standard (PM_{2.5} Plan) included an analogous control measure (BCM-07: Emission Reductions from Incinerators). In addition, U.S. EPA released the Federal “Good Neighbor Plan” for the 2015 Ozone NAAQS in March 2023, which specifies NO_x limits for MSW incinerators to be achieved by 2026.⁴²

As part of implementation of L-CMB-09, BCM-07, and U.S. EPA’s Good Neighbor Plan, staff conducted a BARCT analysis for the MSW incineration equipment category. South Coast AQMD Rule 1165 – Control of Emissions from Municipal Solid Waste Incinerators was developed to satisfy South Coast AQMD’s commitments for incinerators under these plans.⁴³ Rule 1165 reduces NO_x emissions through the installation of SCR technology and requires continuous emission monitoring, periodic source testing to ensure compliance, and establishes requirements for recordkeeping.

Table 4-20 compares South Coast AQMD Rule 1165 with control measures for incinerators in other jurisdictions. The only other municipal solid waste facility in California is in Stanislaus County in the San Joaquin Valley.⁴⁴ MSW combustors are required to comply with NO_x emission limits under SJVAPCD Rule 4352 – Solid Fuel Fired Boilers, Steam Generators and Process Heaters; however, there are no applicable VOC emission limits. Additionally, Placer County APCD’s Rule 206 – Incineration Burning enforces a one-hour average NO_x limit of 50 ppm at 12 percent CO₂. Based on operating data for CO₂ measurements of the three units at SERRF, this is approximately equivalent to the current permitted operating limit of the three units. Upon full implementation, Rule 1165 will further reduce NO_x emissions beyond the level required by other districts’ rules.

⁴² U.S. EPA. Federal “Good Neighbor Plan” for the 2015 Ozone National Ambient Air Quality Standards implements “good neighbor” provision of Clean Air Act Section 1102 (a)(2)(D)(i)(I). <https://www.govinfo.gov/content/pkg/FR-2023-06-05/pdf/2023-05744.pdf>

⁴³ South Coast AQMD, Final Staff Report for Proposed Rule 1165 - Control of Emissions from Municipal Solid Waste Incinerators, September 2024. <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2024/2024-Sep6-028.pdf?sfvrsn=8>

⁴⁴ South Coast AQMD, Proposed Rule 1165 - Control of Emissions from Municipal Solid Waste Incinerators Public Workshop, July 11, 2024. https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/pr-1165/pr-1165_public-workshop-final.pdf?sfvrsn=8

**TABLE 4-20
COMPARISON OF CONTROL MEASURES FOR INCINERATORS**

| Rule Element | South Coast AQMD Rule 1165 – Control of Emissions from Municipal Solid Waste Incinerators (Adopted 9/6/24) | SJVAPCD Rule 4352 – Solid Fuel Fired Boilers, Steam Generators and Process Heaters (Amended 12/16/21) | Placer County APCD Rule 206 – Incineration Burning (Amended 10/13/16) | U.S. EPA Federal “Good Neighbor Plan” for the 2015 Ozone NAAQS (Issued 3/15/23) |
|-----------------|--|--|---|---|
| Applicability | Municipal Solid Waste Incinerator that combusts more than 35 tons or more per day | Municipal Solid Waste Incinerators | Any incinerator which burns combustible or flammable waste or refuse-derived fuel, including pathological waste | Solid Waste Combustors or Incinerators |
| Control Measure | <ul style="list-style-type: none"> • NOx emission limit of 110 ppm at 7% O2 on a 24-hour block average by 5/1/26 • NOx emission limit of 105 ppm at 7% O2 on a 30-day rolling average by 5/1/26 • NOx emission limit of 75 ppm at 7% O2 on a 30-day rolling average by 5/1/29 | After 1/1/24: <ul style="list-style-type: none"> • NOx emission limit of 110 ppm at 12% CO2 on a 24-hour block average • NOx emission limit of 90 ppm at 12% CO2 on a 12-month rolling average | <ul style="list-style-type: none"> • NOx emission limit of 50 ppm at 12% CO2 on a one-hour average | <ul style="list-style-type: none"> • NOx emission limit of 110 ppm at 7% O2 on a 24-hour block average by 5/1/26 • NOx emission limit of 105 ppm at 7% O2 on a 30-day rolling average by 5/1/26 |
| Exemptions | <ul style="list-style-type: none"> • Medical/infectious waste • whole or chipped tree stumps • whole or chipped tree limbs • sewage sludge | <ul style="list-style-type: none"> • Medical Waste incinerators • Limits shall not apply during start-up or shutdown | <ul style="list-style-type: none"> • Biomass boilers • Crematory incinerators • Medical Waste incinerators • Air curtain incinerators | |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1165 – Control of Emissions from Municipal Solid Waste Incinerators (Adopted 9/6/24) | SJVAPCD Rule 4352 – Solid Fuel Fired Boilers, Steam Generators and Process Heaters (Amended 12/16/21) | Placer County APCD Rule 206 – Incineration Burning (Amended 10/13/16) | U.S. EPA Federal “Good Neighbor Plan” for the 2015 Ozone NAAQS (Issued 3/15/23) |
|--------------|--|---|---|---|
| | <ul style="list-style-type: none"> • wood pallets • construction, renovation, or demolition wastes • railroad ties • telephone poles • industrial process or manufacturing process wastes • Motor vehicles • Pyrolysis equipment • Gasification equipment • equipment used for moisture removal and/or biological degradation processes | | <ul style="list-style-type: none"> • Treatment units associated with aeration of contaminated soil, air stripping, and vapor extraction operations | |

c. Conclusion

As detailed above, South Coast AQMD Rule 1165 is at least as stringent as other districts' rules and staff found no opportunity to accommodate contingency measures for the waste disposal categories in the Basin that are surplus to the attainment strategy and would achieve quantifiable reductions within two years of a triggering event.

Cleaning and Surface Coatings

Cleaning and Surface Coating source categories include 210 – Laundering, 220 – Degreasing, 230 – Coatings and Related Process Solvents, 240 – Printing, 250 – Adhesives and Sealants, and 299 – Other (Cleaning and Surface Coating). These source categories contribute 0.04 tpd NOx and 40.63 tpd of VOC to the 2037 Basin summer planning emissions inventory.

Emissions from these source categories are primarily VOC from the application and use of solvents, coatings, inks, adhesives, and sealants. More than half of VOC emissions are from the Coatings and Related Processes category and key contributing emission sources consist of auto refinishing, metal parts and products coatings, wood furniture and fabricated products coatings, aircraft and aerospace coatings, and thinning and cleanup solvent uses. Table 4-21 includes the list of source categories, VOC emissions, and applicable South Coast AQMD VOC rules. Key requirements and VOC limits for these VOC rules are summarized in Table 4-22.

TABLE 4-21
LIST OF SOURCE CATEGORIES AND APPLICABLE VOC RULES IN SOUTH COAST AQMD

| Cleaning and Surface Coating Category | VOC Emissions (tpd) | NOx Emissions (tpd) | Applicable South Coast AQMD Rules |
|---|---------------------|---------------------|---|
| 210 – Laundering | 0.19 | 0.00 | 1102 |
| 220 – Degreasing | 13.54 | 0.00 | 442, 1122, 1171 |
| 230 – Coatings and Related Process Solvents | 21.01 | 0.00 | 442, 1104, 1106, 1107, 1115, 1124, 1125, 1126, 1132, 1136, 1145, 1151, 1162 |
| 240 – Printing | 0.89 | 0.00 | 442, 1128, 1130, 1130.1 |
| 250 – Adhesives and Sealants | 4.62 | 0.00 | 442, 1168 |
| 299 – Other (Cleaning and Surface Coatings) | 0.65 | 0.04 | 442, 1144 |
| Total | 40.63 | 0.04 | |

**TABLE 4-22
SOUTH COAST AQMD RULES FOR CLEANING AND SURFACE COATING CATEGORIES**

| Rule | Applicability | Control Measure |
|--|---|--|
| Rule 442 – Usage of Solvents (Amended 12/15/00) | Applies to any person using VOC-containing materials or equipment that emit VOC and are not subject to Regulation XI rule. VOC-containing materials include coatings, resins, adhesives, inks, solvents, thinners, diluents, mold seal and release compounds, lubricants, cutting oils and quenching oils. Equipment and materials include, but are not limited to, coating, adhesive, and ink application equipment, metal forming, casting, or forging operations | <ul style="list-style-type: none"> • Shall not discharge organic materials into the atmosphere from equipment in which organic solvents or materials containing organic solvents are used, unless such emissions have been reduced by 85% |
| Rule 1102 – Dry Cleaners Using Solvent Other Than Perchloroethylene (Amended 11/17/00) | Applies to all persons owning or operating a dry cleaning facility using solvent other than perchloroethylene (PERC) | <ul style="list-style-type: none"> • Install and operate a solvent recovery dryer or an equivalent control device that reduces VOC emissions from drying tumblers by at least 90% by weight • Usage of overall solvent shall be less than 4.5 lb/100 lb of materials dry cleaned |
| Rule 1104 – Wood Flat Stock Coating Operations (Amended 8/13/99) | Applies to all persons applying coating, inks, and adhesives to wood flat stock for the purpose of manufacturing a finished wood panel intended for attachment to the inside walls of buildings, including, but not limited to, homes and office buildings, mobile homes, trailers, prefabricated buildings and similar structures, boats, and ships; or a finished exterior wood siding intended for use in construction | <p>VOC requirements:</p> <ul style="list-style-type: none"> • 250 grams/Liter (g/L) of coating, ink, or adhesive (2.1 lb/gal) for interior wood panels and exterior wood siding <p>Application methods:</p> <ul style="list-style-type: none"> • Flow coater, roll coater, or dip coater; • Hand application method; or • High-volume, low-pressure (HVLP) or electrostatic applications <p>Control equipment requirements:</p> <ul style="list-style-type: none"> • Reduce emissions from an emission collection system by at least 95% by weight, or the output of the air pollution control device less than 50 ppm as carbon (ppmC) |

| Rule | Applicability | Control Measure |
|--|---|---|
| | | <ul style="list-style-type: none"> Emission collection system collection efficiency at least 90% by weight of the emissions generated by the sources |
| <p>Rule 1106 – Marine and Pleasure Craft Coatings (Amended 1/6/23)</p> | <p>Applies to any person who supplies, sells, offers for sale, markets, manufactures, blends, packages, repackages, possesses or distributes any Marine or Pleasure Craft Coating and any associated solvent used with a Marine or Pleasure Craft Coating for use, as well as any person who applies, stores at a worksite, or solicits the application of any Marine or Pleasure Craft Coating and any associated solvent used with a Marine or Pleasure Craft Coating, within the South Coast AQMD Jurisdiction</p> | <p>VOC contents of marine coatings:</p> <ul style="list-style-type: none"> 275 to 420 g/L of baked coating 340 to 610 g/L of air dried coating <p>VOC content of pleasure craft coatings:</p> <ul style="list-style-type: none"> 330 to 780 g/L <p>VOC content of low-solids coatings:</p> <ul style="list-style-type: none"> 120 g/L for marine and pleasure craft coatings |
| <p>Rule 1107 – Coating of Metal Parts and Products (Amended 1/6/23)</p> | <p>Applies to all metal coatings operations except those performed on aerospace assembly, magnet wire, marine craft, motor vehicle, metal container, and coil coating operations</p> | <p>VOC content of coatings:</p> <ul style="list-style-type: none"> 275 to 420 g/L (2.3 to 3.5 lb/gal) of air dried or baked coating |
| <p>Rule 1115 – Motor Vehicle Assembly Line Coating Operations (Amended 3/4/22)</p> | <p>Applies to an owner or operator engaged in assembly line coating operations conducted during the manufacturing of new motor vehicles and other automotive parts that are coated during the vehicle assembly process as well as during associated solvent cleaning operations</p> | <p>VOC emission limits for motor vehicle assembly coating operations:</p> <ul style="list-style-type: none"> Electrodeposition primer operations: <ul style="list-style-type: none"> Solids turnover ratio (RT)≥0.16 <ul style="list-style-type: none"> 0.084 kg/L of solid deposited 0.04≤RT<0.16 <ul style="list-style-type: none"> 0.084 x 350^{0.160-RT} kg/L RT<0.04 <ul style="list-style-type: none"> No VOC emission limit Primer-surfacer, topcoat, combined primer-surfacer and topcoat operations: <ul style="list-style-type: none"> 1.44 kg/L (12 lb/gal) of solids Final repair operations: <ul style="list-style-type: none"> 0.58 kg/L (4.8 lb/gal) of coating |

| Rule | Applicability | Control Measure |
|--|---|--|
| | | VOC content limits for miscellaneous materials used in motor vehicle assembly coating operations: <ul style="list-style-type: none"> • Vary depending on materials used ranging from 200 to 900 lb/gal (1.7 to 7.5 lb/gal) |
| Rule 1122 – Solvent Degreasers (Amended 5/1/09) | Applies to all persons who own or operate batch-loaded cold cleaners, open-top vapor degreasers, all types of conveyORIZED degreasers, and air-tight and airless cleaning systems that carry out solvent degreasing operations with a solvent containing VOC or with a National Emission Standards for Hazardous Air Pollutant (NESHAP) halogenated solvent | Cleaning solvent VOC content limits: <ul style="list-style-type: none"> • Batch-loaded cold cleaners: 25 g/L • ConveyORIZED (in-line) cold cleaners: 25 g/L • Vapor degreasers: 25 g/L Includes other applicable requirements |
| Rule 1125 – Metal Container, Closure, and Coil Coating Operations (Amended 3/7/08) | Applies to all coating operations in the manufacturing and/or reconditioning of metal cans, containers, drums, pails, lids, closures, flat metal sheets, strips, rolls, and coils | VOC limits vary depending on coating categories: <ul style="list-style-type: none"> • Can coatings: 225 to 660 g/L • Drums, pails, and lids coatings: 340 to 510 g/L • Coil coatings: 200 g/L • All other operations: 0 to 800 g/L Emission control system with $\geq 90\%$ collection efficiency and destruction efficiency $\geq 95\%$ by weight |
| Rule 1126 – Magnet Wire Coating Operations (Amended 1/13/95) | Applies to all coating operations on magnet wire, where the wire is continuously drawn through a coating applicator | Rule applicability threshold: Operations emit 1 kg (2.2 lb)/hour or more but not to exceed 5 kg (11 lb)/day of VOC VOC limit: 200 g/L (1.67 lb/gal) of coating Emission control system shall achieve $\geq 90\%$ overall efficiency by direct incineration at $\geq 1,499$ °F |
| Rule 1130 – Graphic Arts (Amended 5/2/14) | Applies to any person performing graphic arts operations or who supplies, sells, offers for sale, markets, manufactures, blends, repackages, stores at a worksite, distributes, applies or solicits the | VOC content of graphic arts materials limits varies by material type, ranging from 150 to 300 g/L VOC content of fountain solution varies ranging from 16 to 85 g/L |

| Rule | Applicability | Control Measure |
|---|---|---|
| | application of graphic arts materials for use | Approved emission control system requires reduction of VOC emissions by at least 95% or no more than 50 ppm at the output of the control device |
| Rule 1130.1 – Screen Printing Operations (Amended 12/13/96) | Applies to persons performing screen printing operations or who sell, distribute, or require the use of screen printing materials | <p>For screen printing coatings and inks products: 500 to 800 g VOC/L</p> <p>For screen printing coatings and inks substrate: 600 to 800 g VOC/L</p> <p>For screen printing materials: 400 to 800 g VOC/L</p> <p>For extreme performance screen printing materials: 400 g VOC/L</p> |
| Rule 1132 – Further Control of VOC Emissions from High-Emitting Spray Booth Facilities (Amended 5/5/06) | Applies to any spray booth facility, except petroleum industry facilities, that uses VOC-containing materials that amount to more than 40,000 lb (20 tons) per year of VOC emissions in any emission inventory year beginning in 1999 | <p>Requirements for each spray booth:</p> <ul style="list-style-type: none"> • VOC-containing materials that have a VOC content 65% or lower than any applicable rule limit; • Emission control system that has an overall efficiency of 65% or more; or • A combination thereof <p>Alternative compliance plan, in lieu of the above requirements:</p> <ul style="list-style-type: none"> • Use of VOC-containing materials that have a VOC content at least 85% lower than any applicable rule limit, emission control systems that have an overall efficiency at least 85% by weight, or a combination thereof • Any combination of measures to reduce VOC emissions by at least 65 percent |
| Rule 1136 – Wood Products Coatings (Amended 6/14/96) | Applies to coatings or strippers to, and surface preparation of, any wood products, including furniture, cabinets, shutters, frames and toys. This rule shall not apply to residential noncommercial operations | <p>VOC content limits of coatings and strippers:</p> <ul style="list-style-type: none"> • High-solid stains: 350 g/L • Inks: 500 g/L • Mold-seal coatings: 750 g/L • Multi-colored coatings: 275 g/L • Low-solids coatings: 120 g/L • All other coatings: 275 g/L |

| Rule | Applicability | Control Measure |
|---|--|---|
| | | VOC limits in wood products strippers: <ul style="list-style-type: none"> • Contain less than 350 g VOC/L • VOC composite vapor pressure ≤ 2 mm Hg (0.04 psia) at 20°C |
| Rule 1143 – Consumer Paint Thinners and Multi-Purpose Solvents (Amended 12/3/10) | Applies to any person who supplies, sells, offers for sale, or manufactures consumer paint thinners and multi-purpose solvents for sale, as well as any person who uses or solicits the use of any consumer paint thinner and multi-purpose solvent within the South Coast AQMD jurisdiction | VOC content limits: <ul style="list-style-type: none"> • Consumer paint thinner: 25 g/L • Consumer multi-purpose solvent: 25 g/L |
| Rule 1145 – Plastic, Rubber, Leather, and Glass Coatings (Amended 12/4/09) | Reduces VOC emissions from the application of coatings to any plastic, rubber, leather, or glass products | VOC limits vary by coating category ranging from 60 to 800 g/L Air pollution control equipment shall reduce VOC emissions from an emission collection system by $\geq 95\%$, or the device output VOC concentration shall be less than 50 ppm calculated as carbon |
| Rule 1149 – Storage Tank and Pipeline Cleaning and Degassing (Amended 5/2/08) | Applies to the cleaning and degassing of a pipeline opened to atmosphere outside the boundaries of a facility, stationary tank, reservoir, or other container, storing or last used to store VOC | Vapor pressures of VOC within the tank, reservoir or other container to be less than: <ul style="list-style-type: none"> • 500 gal (1,893 L): 3.9 psia • 26,420 gal (100,000 L): 2.6 psia • 100,000 gal (378,500 L): 0.5 psia |
| Rule 1151 – Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations (Amended 11/1/24) | Applies to VOC emissions from automotive coating applications performed on motor vehicles, mobile equipment, and associated parts and components | VOC content limits vary by automotive coating category ranging from 60 to 840 g/L (0.5 to 7.0 lb/gal) |
| Rule 1168 – Adhesive and Sealant Applications (Amended 11/4/22) | Applies to any person who uses, stores, sells, supplies, distributes, offers for sale, or manufactures any adhesives, adhesive primers, sealants, or sealant primers for use, or the owner or operator of a facility conducting such operations | VOC content limits: For adhesives <ul style="list-style-type: none"> • 20 to 850 g/L • Higher viscosity CPVC: 490 g/L (400 g/L, effective 7/1/24) • Rubber vulcanization adhesive 850 g/L (250 g/L, effective 1/1/28) • Top and trim adhesive: 540 g/L (250 g/L, effective 1/1/28) |

| Rule | Applicability | Control Measure |
|--|--|---|
| | | For substrate specific adhesives: <ul style="list-style-type: none"> • 30 to 200 g/L For sealants: <ul style="list-style-type: none"> • 50 to 760 g/L • Clear, paintable, and immediately water-resistant sealant: 380 g/L (250 g/L, effective 1/1/26) • On-component foam sealant: 18% (~180 g/L, effective 7/1/23) For adhesive primers: 150 to 785 g/L For sealant primers: 250 to 775 g/L |
| Rule 1171 – Solvent Cleaning Operations (Amended 5/1/09) | Applies to all persons who use these solvent materials in solvent cleaning operations during the production, repair, maintenance, or servicing of parts, products, tools, machinery, equipment, or general work areas; all persons who store and dispose of these materials used in solvent cleaning operations; and all solvent suppliers who supply, sell, or offer for sale solvent cleaning materials for use in solvent cleaning operations | VOC content limits for product cleaning during manufacturing process or surface preparation for coating, adhesive, or ink application: <ul style="list-style-type: none"> • 25 to 800 g/L (0.21 to 6.7 lb/gal) For repair and maintenance cleaning: <ul style="list-style-type: none"> • 25 to 800 g/L (0.21 to 6.7 lb/gal) For cleaning of coatings or adhesive application equipment: <ul style="list-style-type: none"> • 25 g/L (0.21 lb/gal) For cleaning of ink application equipment: <ul style="list-style-type: none"> • 25 to 100 g/L (0.21 to 0.83 lb/gal) For cleaning of polyester resin application equipment: <ul style="list-style-type: none"> • 25 g/L (0.21 lb/gal) |

To find potentially feasible contingency measures, staff reviewed other air districts’ VOC rules for the cleaning and surface coating category that are comparable to South Coast AQMD rules. The small quantity of NOx emissions is associated with major source category 299 – Other Cleaning and Surface Coatings. These emissions will be discussed in more detail as part of the analysis for that category.

In the following sections, South Coast AQMD staff compared emission limits, optional control requirements, and work practice standards in South Coast AQMD rules to comparable requirements in rules from other air districts.

1. *Laundering*

a. Overview

This source category accounts for 0.19 tpd of VOC and zero NO_x in the Basin's 2037 summer planning emissions inventory.

b. Evaluation

South Coast AQMD Rule 1102 establishes dry cleaning operation and equipment requirements for dry cleaners using non-perchloroethylene as the cleaning solvent. Rule 1102 does not have a small operation exemption for dry cleaning solvent usage, while other air districts such as SMAQMD and BAAQMD exempt dry cleaning facilities that use less than 10,000 liters (L) of solvent per year. All air districts including South Coast AQMD have similar equipment and operation requirements, including no liquid leaks or visible emissions from dry cleaning equipment, storage of solvent in sealed containers, a full drainage of cartridge filters before removal, etc. Rule 1102 requires draining cartridge filters a minimum of 24 hours before being discarded, whereas other districts require eight to 24 hours lead time to drain filters before being discarded. It also requires emission control equipment that reduces VOC emissions with a control efficiency of 90 percent or more.

c. Conclusion

As demonstrated below in Table 4-23, South Coast AQMD Rule 1102 currently has in place the most stringent measures feasible, and the rule requirements are at least as stringent as applicable rules in other air districts. Therefore, staff concludes that no additional emission reduction opportunities exist and that no measure is feasible as a contingency measure.

**TABLE 4-23
COMPARISON OF APPLICABLE RULES FOR MAJOR SOURCE CATEGORY OF LAUNDERING**

| Rule Element | South Coast AQMD Rule 1102 – Dry Cleaners Using Solvent Other Than Perchloroethylene (Amended 11/17/00) | SJVAPCD Rule 4672 – Petroleum Solvent Dry Cleaning Operations (Amended 12/17/92) | SMAQMD Rule 444 – Petroleum Solvent Dry Cleaning (Adopted 8/13/81) | BAAQMD Rule 8-17 – Non-Halogenated Solvent Dry Cleaning Operations (Amended 3/4/09) | VCAPCD Rule 74.5.1 – Petroleum Solvent Dry Cleaning (Adopted 12/4/90) |
|--------------------------------------|--|--|---|--|--|
| Applicability | Dry cleaning facility using solvent other than perchloroethylene (PERC) | Petroleum solvent washers, dryers, solvent filters, settling tanks, vacuum stills, and other containers and conveyors of petroleum solvents that are used in petroleum solvent dry cleaning facilities | Emissions of petroleum solvents used in dry cleaning | Dry cleaning or related operations using non-halogenated solvent(s) or solvent(s) containing less than 5% by weight of total halogens | Any petroleum solvent dry cleaning operation |
| Exemptions | <ul style="list-style-type: none"> • Dry cleaning equipment exclusively using PERC as cleaning solvent • Dry cleaning equipment exclusively using a Group II exempt compound as cleaning solvent, professional laundering equipment using liquid CO₂ as cleaning solvent, and professional wet cleaning equipment using water as cleaning solvent, provided the detergents and additives contain <50 g VOC/L | <ul style="list-style-type: none"> • Dry cleaning facilities exclusively using PERC as cleaning solvent | <ul style="list-style-type: none"> • Dry cleaning using other than a petroleum solvent (e.g., Stoddard) • Dry cleaners consuming <10,000 L (2,642 gal) of petroleum solvent per year | <ul style="list-style-type: none"> • Dry cleaning operations that use CO₂, aqueous solvents, or synthetic solvents containing ≥5% by weight of total halogens (which are subject to Rule 11-16) • Dry cleaners consuming <10,000 L (2,642 gal) of petroleum solvent per year | |
| Equipment and Operating Requirements | <ul style="list-style-type: none"> • No liquid leaking from equipment • Keep all washer lint traps, button traps, access doors, and other parts closed at all times | <ul style="list-style-type: none"> • No liquid leaking from equipment • Keep all washer lint traps, button traps, access doors, and other parts closed at all times | <ul style="list-style-type: none"> • No liquid leaking from equipment • Keep all solvents in closed containers • Keep all washer lint traps, button traps, | <ul style="list-style-type: none"> • Keep all parts of dry cleaning system closed • Cartridge filters shall be drained in the filter housing for at least eight hours or placed in an enclosed device | <ul style="list-style-type: none"> • A filter system that reduces petroleum solvent content in all filtration wastes to no greater than 1.0 lb/100 lb of articles cleaned |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1102 – Dry Cleaners Using Solvent Other Than Perchloroethylene (Amended 11/17/00) | SJVAPCD Rule 4672 – Petroleum Solvent Dry Cleaning Operations (Amended 12/17/92) | SMAQMD Rule 444 – Petroleum Solvent Dry Cleaning (Adopted 8/13/81) | BAAQMD Rule 8-17 – Non-Halogenated Solvent Dry Cleaning Operations (Amended 3/4/09) | VCAPCD Rule 74.5.1 – Petroleum Solvent Dry Cleaning (Adopted 12/4/90) |
|-------------------------------|---|---|---|--|--|
| | <ul style="list-style-type: none"> • Clean button and lint traps each working day • Store still residue, used filtering material, lint, used solvent and all other wastes containing solvent in sealed containers • Cartridge filters shall be fully drained in a sealed filter housing for at least 24 hrs before removed • Store all solvents in closed containers • No liquid solvent or visible emission is allowed to vaporize from wastewater evaporators • Overall gallons of solvent used shall be <4.5 lb/100 lb of materials dry cleaned | <ul style="list-style-type: none"> • Store solvents in closed container • Store used filtering material into a sealed container immediately after removal from the filter • Cartridge filters shall be fully drained in a sealed filter housing for at least 24 hrs before being discarded, or 12 hrs if the filter is dried in a dryer vented to an emission control device • Reduce petroleum solvent content in all filtration wastes to ≤1 kg/100 kg of materials dry cleaned | <p>access doors, and other parts closed at all times</p> <ul style="list-style-type: none"> • Store still residue in sealed containers • Cartridge filters shall be fully drained in a sealed filter housing for at least 12 hours before removal • Reduce solvent content in filtering system <1 kg/100 kg of articles dry cleaned | <p>including a solvent recovery dryer until dry before being discarded</p> | <ul style="list-style-type: none"> • Cartridge filters shall be fully drained in a sealed filter housing for at least 24 hrs before being discarded, or 12 hrs if the filter is dried in a dryer vented to an emission control device |
| Emission control requirements | <ul style="list-style-type: none"> • Requires a solvent recovery dryer that reduces VOC emissions by at least 90% | <ul style="list-style-type: none"> • Requires a solvent recovery dryer that reduces VOC emissions by at least 90% | <ul style="list-style-type: none"> • Limit solvent emissions to an average of 3.5 kg/100 kg of articles dry cleaned | <ul style="list-style-type: none"> • A solvent recovery dryer shall recover at least 85% by weight of solvent | <p>A solvent recovery dryer shall reduce VOC emissions by at least 90%</p> |

2. Degreasing

a. Overview

There are three South Coast AQMD rules that regulate VOC emissions from degreasing – Rules 442, 1122, and 1171. This source category accounts for 13.54 tpd of VOC and zero NOx emissions in the Basin’s 2037 summer planning inventory. A breakdown of these emissions is provided in Table 4-24. Table 4-25 summarizes applicable rule requirements in South Coast AQMD and other air districts for this major source category.

**TABLE 4-24
DEGREASING EMISSIONS BASED ON 2037 SUMMER PLANNING INVENTORY**

| Source Category | VOC (tpd) |
|--|--------------|
| 204 – Cold Cleaning (Batch - Conveyor - Spray Gun) | 7.89 |
| 206 – Vapor Degreasing (Batch - Conveyor) | 0.12 |
| 208 – Handwiping | 3.00 |
| 995 – Other | 2.52 |
| Total | 13.54 |

b. Evaluation

South Coast AQMD Rule 442 establishes general VOC emission limits and emission control requirements for VOC-containing materials or equipment that are not subject to source-specific VOC rules. Rule 442 generally requires an overall VOC emission reduction of 85 percent. While other air districts have similar requirements, South Coast AQMD has a facility-wide VOC emission limit of 833 pounds per month per facility. This limit is more stringent than most other districts’ rules except for Eastern Kern APCD (EKAPCD) Rule 410, which contains a facility-wide VOC emission limit of 450 pounds per month. However, nearly all facilities in South Coast AQMD are subject to source-specific VOC rules which makes Rule 442 not applicable. In the rare instances where Rule 442 is applicable, a control device is the primary route of compliance.

South Coast AQMD Rule 1122 establishes a VOC content limit for cleaning solvents of 25 grams per liter (g/L) of solvent or less. This VOC content limit is as stringent as other air districts’ applicable rules.

South Coast AQMD Rule 1171 establishes VOC emissions control and other applicable operational requirements in solvent cleaning operations. Comparing the VOC content limits in cleaning solvents with other air districts in California is not straightforward because other air district rules have different scope of applicability and exemptions compared to South Coast AQMD’s rule, and include VOC limits that apply not only to solvent cleaning operations, but also to coating operations. For example, BAAQMD Rule 8-16 has VOC content limits on architectural coating operations, which are regulated by South Coast AQMD Rule 1113. Table 4-25.3 summarizes the comparison of Rule 1171 with similar rules from other air districts. Overall, Rule 1171 and other applicable South Coast AQMD rules have VOC limits and emission control requirements comparable to other air districts for the degreasing source category.

c. Conclusion

Based on the evaluation that South Coast AQMD has rules applicable to this source category as stringent as or more stringent than other districts' rules, staff did not find any potential contingency measure in the degreasing category.

TABLE 4-25
COMPARISON OF APPLICABLE RULES FOR THE MAJOR SOURCE CATEGORY OF DEGREASING

| TABLE 4-25.1 – General Usage of Solvents | | | | | |
|--|---|---|---|---|--|
| Rule Element | South Coast AQMD Rule 442 – Usage of Solvents (Amended 12/15/00) | SJVAPCD Rule 4661 – Organic Solvents (Amended 9/20/07) | EKAPCD Rule 410 – Organic Solvents (Amended 9/1/22) | SMAQMD Rule 441 – Organic Solvents (Adopted 12/6/78) | BAAQMD Rule 8-4 – General Solvent and Surface Coating Operations (Amended 10/16/02) |
| Applicability | Use of VOC-containing materials or equipment that emit VOC, including, but not limited to, coatings, resins, adhesives, inks, solvents, thinners, diluents, mold seal and release compounds, lubricants, cutting oils and quenching oils. Equipment and materials used in coating, adhesive, and ink application equipment, metal forming, casting, or forging operations | Any source operation that uses organic solvents | Any source operation emitting VOC from the use of organic solvents | Emissions of organic solvents that may result from the use of organic solvents | Operations using solvents and surface coatings other than those specified by other Regulation 8 rules. Applies to model making, printed circuit board manufacturing and assembly, electrical and electronic component manufacturing, surface coating of test panels, training facilities where the application of coating is for training purposes, stencil coatings, low usage coating activities exempt from other Regulation 8 Rules, coatings specifically exempt from other Regulation 8 Rules or solvent usage not specified by other Regulation 8 Rules |
| Exemptions | <ul style="list-style-type: none"> Any operation that emits VOC and is | <ul style="list-style-type: none"> Manufacture of organic solvents, or the | <ul style="list-style-type: none"> Manufacture, transport, or storage of | <ul style="list-style-type: none"> Manufacture of organic solvents, or the | <ul style="list-style-type: none"> Surface preparation of material subject to |

TABLE 4-25.1 – General Usage of Solvents

| Rule Element | South Coast AQMD Rule 442 – Usage of Solvents (Amended 12/15/00) | SJVAPCD Rule 4661 – Organic Solvents (Amended 9/20/07) | EKAPCD Rule 410 – Organic Solvents (Amended 9/1/22) | SMAQMD Rule 441 – Organic Solvents (Adopted 12/6/78) | BAAQMD Rule 8-4 – General Solvent and Surface Coating Operations (Amended 10/16/02) |
|--------------|---|--|--|---|---|
| | <p>subject to a Regulation XI rule</p> <ul style="list-style-type: none"> • Manufacture, transport, or storage of organic solvents, or the transport or storage of materials containing organic solvents • VOC emissions from VOC-containing materials or equipment subject to other Regulation IV rules (except Rule 481 – Spray Coating Operations) or which are exempt from air pollution control requirements • Use of pesticides, including insecticides, rodenticides, or herbicides • Aerosol products | <p>transport of organic solvents or materials containing organic solvents</p> <ul style="list-style-type: none"> • Any source operation subject to other source-specific VOC rules • Spraying or other employment of insecticides, pesticides or herbicides • Employment, application, evaporation, or drying of saturated halogenated hydrocarbons (HCs) or PERC • Use of any material meeting all the following conditions: <ul style="list-style-type: none"> ○ Volatile content consists only of water and organic solvents ○ Organic solvent content comprises not more than 20% of total volatile content | <p>organic solvents, or the transport or storage of materials containing organic solvents</p> <ul style="list-style-type: none"> • Coatings, coating removers (strippers), surface preparation material, and cleanup material subject to other Regulation IV rules • The spraying or other employment of insecticides, pesticides or herbicides • The employment, application, evaporation or drying of saturated halogenated HCs or PERC • The use of any material meeting all the following conditions: <ul style="list-style-type: none"> ○ Volatile content consists only of water and organic solvents ○ Organic solvent content comprises | <p>transport or storage of organic solvents or materials containing organic solvents</p> <ul style="list-style-type: none"> • Spraying or other employment of insecticides, pesticides, or herbicides • employment, application, evaporation or drying of saturated halogenated HCs or PERC • Use of any material, machine, equipment or other contrivance that meet all the following: <ul style="list-style-type: none"> ○ Volatile content consists only of water and organic solvents ○ Organic solvent content comprises not more than 20% of total volatile content ○ Volatile content is photochemically not reactive | <p>specific requirements of other rules</p> <ul style="list-style-type: none"> • Surface coating operations using non-refillable aerosol containers • Film cleaning operations that use 1,1,1-trichloroethane exclusively • Limited exemption to specific surface preparation and cleaning operations • Moving and working surfaces of machinery used for product development and in production |

TABLE 4-25.1 – General Usage of Solvents

| Rule Element | South Coast AQMD Rule 442 – Usage of Solvents (Amended 12/15/00) | SJVAPCD Rule 4661 – Organic Solvents (Amended 9/20/07) | EKAPCD Rule 410 – Organic Solvents (Amended 9/1/22) | SMAQMD Rule 441 – Organic Solvents (Adopted 12/6/78) | BAAQMD Rule 8-4 – General Solvent and Surface Coating Operations (Amended 10/16/02) |
|--|---|--|---|--|--|
| | | <ul style="list-style-type: none"> ○ Volatile content is photochemically not reactive ○ Organic solvent does not contact with flame | <ul style="list-style-type: none"> not more than 20% of total volatile content ○ Volatile content is photochemically not reactive ○ Organic solvent does not contact with flame ● Disinfectants | <ul style="list-style-type: none"> ○ Organic solvent does not contact with flame | |
| <p>VOC Emissions Limit and Emission Control Requirements</p> | <p>VOC emissions limit</p> <ul style="list-style-type: none"> ● 833 lbs/month per facility <p>Emission control equipment, meeting the requirements listed below, can be used as an alternative compliance pathway</p> <ul style="list-style-type: none"> ● 85.5% overall reductions ● Output concentration <50 ppm as carbon with no dilution | <p>VOC emissions limit from solvents subjected to heat</p> <ul style="list-style-type: none"> ● 15 lb VOC/day per operation <p>Emission control equipment</p> <ul style="list-style-type: none"> ● 85% overall reductions <p>Photochemically reactive solvents VOC emissions</p> <ul style="list-style-type: none"> ● 40 lb/day per operation <p>Non-photochemically reactive solvents VOC emissions</p> <ul style="list-style-type: none"> ● 3,000 lb/day per operation | <p>VOC emissions limit</p> <ul style="list-style-type: none"> ● 450 lbs/month per facility <p>Emission control equipment</p> <ul style="list-style-type: none"> ● 85% overall reductions <p>Solvents Subjected to Heat VOC emissions</p> <ul style="list-style-type: none"> ● 40 lb/day per operation or use of emission control equipment <p>Photochemically reactive solvents VOC emissions</p> <ul style="list-style-type: none"> ● 40 lb/day per operation or use of emission control equipment | <p>Organic materials VOC emission limits</p> <ul style="list-style-type: none"> ● 15 lb/day or 3.1 lb/hr per operation <p>Photochemically reactive solvents VOC emission limits</p> <ul style="list-style-type: none"> ● 39.7 lb/day or 7.9 lb/hr per operation <p>Non-photochemically reactive solvents VOC emission limits</p> <ul style="list-style-type: none"> ● 2,970 lb/day or 441 lb/hr per operation <p>Emission control equipment</p> <ul style="list-style-type: none"> ● 85% overall control | <p>Solvents or surface coating VOC emissions</p> <ul style="list-style-type: none"> ● 5 tons/year from any source <p>Emission control equipment</p> <ul style="list-style-type: none"> ● 85% overall control |

| TABLE 4-25.1 – General Usage of Solvents | | | | | |
|--|--|--|---|--|---|
| Rule Element | South Coast AQMD Rule 442 – Usage of Solvents (Amended 12/15/00) | SJVAPCD Rule 4661 – Organic Solvents (Amended 9/20/07) | EKAPCD Rule 410 – Organic Solvents (Amended 9/1/22) | SMAQMD Rule 441 – Organic Solvents (Adopted 12/6/78) | BAAQMD Rule 8-4 – General Solvent and Surface Coating Operations (Amended 10/16/02) |
| | | | Non-photochemically reactive solvents VOC emissions <ul style="list-style-type: none"> • 3,000 lb/day per operation or use of emission control equipment | | |

| TABLE 4-25.2 – Solvent Degreasing | | | | |
|-----------------------------------|--|---|--|---|
| Rule Element | South Coast AQMD Rule 1122 – Solvent Degreasers (Amended 5/1/09) | SJVAPCD Rule 4662 – Organic Solvent Degreasing (Amended 9/20/07) | SMAQMD Rule 454 – Degreasing Operations (Amended 9/25/08) | VCAPCD Rule 74.6 – Surface Cleaning and Degreasing (Amended 11/10/20) |
| Applicability | Batch-loaded cold cleaners, open-top vapor degreasers, all types of conveyORIZED degreasers, and airtight and airless cleaning systems that carry out solvent degreasing operations with a solvent containing VOC or with a NESHAP halogenated solvent. Solvent degreasing operations that are regulated by this rule include, but are not limited to, the removal of contaminants from parts, products, tools, machinery, and equipment | All organic solvent degreasing operations | Solvent degreasing operations | Solvent cleaning activities (application equipment cleanup and all other cleanup of uncured coatings, adhesives, inks, or resins) |
| Exemptions | <ul style="list-style-type: none"> • Degreasers using cleaning materials that contain ≤25 g/L | <ul style="list-style-type: none"> • Any degreaser which uses: <ul style="list-style-type: none"> ○ Unheated non-halogenated solvent | <ul style="list-style-type: none"> • Degreasers which use solvents that contain ≤25 g/L VOC | <ul style="list-style-type: none"> • Use of solvent with a VOC content of ≤25 g/L |

| TABLE 4-25.2 – Solvent Degreasing | | | | |
|-----------------------------------|---|---|--|---|
| Rule Element | South Coast AQMD Rule 1122 – Solvent Degreasers (Amended 5/1/09) | SJVAPCD Rule 4662 – Organic Solvent Degreasing (Amended 9/20/07) | SMAQMD Rule 454 – Degreasing Operations (Amended 9/25/08) | VCAPCD Rule 74.6 – Surface Cleaning and Degreasing (Amended 11/10/20) |
| | <p>with no NESHAP halogenated solvents</p> <ul style="list-style-type: none"> • Batch-loaded cold cleansers or vapor degreasers with open-top surface area <1 square feet or with a capacity of <2 gallons <ul style="list-style-type: none"> ○ Emission collection and control system have overall 85% efficiency or have an output <50 ppm as carbon ○ No NESHAP halogenated solvents are used ○ VOC emissions from all the equipment do not exceed 22 lb/month per facility • Other applicable exemptions | <ul style="list-style-type: none"> ○ Open top surface area <1 square feet or with a capacity <2 gallons ○ A solvent usage <5 gal/month • Non-halogenated cleaning material having a VOC content of ≤25 g/L solvent • Other applicable exemptions | <p>including water and exempt compounds</p> <ul style="list-style-type: none"> • Other applicable exemptions | |
| Requirements | <p>VOC content for a batch-loaded or a conveyorized cold cleaner</p> <ul style="list-style-type: none"> • 25 g/L or less <p>Other operational requirements</p> | <p>VOC content for a cold cleaner</p> <ul style="list-style-type: none"> • 25 g/L or less <p>Other operational requirements</p> | <p>VOC content for a non-vapor degreaser</p> <ul style="list-style-type: none"> • 25 g/L or less including water and exempt compounds <p>Other operational requirements</p> | <p>Maximum VOC content of solvent cleaning activity</p> <ul style="list-style-type: none"> • Application equipment cleanup and all other cleanup of uncured coatings, adhesives, inks, or resins: 25 g/L • Cleaning of electronic components, electrical apparatus, or aerospace components conducted inside a degreaser: 100 g/L • Medical devices and pharmaceuticals, including repair and maintenance of tools, equipment and machinery: 800 g/L |

| TABLE 4-25.2 – Solvent Degreasing | | | | |
|-----------------------------------|--|--|---|---|
| Rule Element | South Coast AQMD Rule 1122 – Solvent Degreasers (Amended 5/1/09) | SJVAPCD Rule 4662 – Organic Solvent Degreasing (Amended 9/20/07) | SMAQMD Rule 454 – Degreasing Operations (Amended 9/25/08) | VCAPCD Rule 74.6 – Surface Cleaning and Degreasing (Amended 11/10/20) |
| | | | | <ul style="list-style-type: none"> • Medical devices and pharmaceuticals – general work surfaces cleaning: 600 g/L • All other solvent cleaning: 25 g/L Other applicable requirements |

TABLE 4-25.3 – Solvent Cleaning Operations

| Rule Element | South Coast AQMD Rule 1171 – Solvent Cleaning Operations (Amended 5/1/09) | SJVAPCD Rule 4663 – Organic Solvent Cleaning, Storage, and Disposal (Amended 9/20/07) | SMAQMD Rule 466 – Solvent Cleaning (Amended 10/28/10) | BAAQMD Rule 8-16 – Solvent Cleaning Operations (Amended 10/16/02) | VCAPCD Rule 74.6 – Surface Cleaning and Degreasing (Amended 11/10/20) |
|---------------|---|---|---|--|--|
| Applicability | All persons who use solvent materials in solvent cleaning operations during the production, repair, maintenance, or servicing of parts, products, tools, machinery, equipment, or general work areas; all persons who store and dispose of these materials used in solvent cleaning operations; and all solvent suppliers who supply, sell, or offer for sale solvent cleaning materials for use in solvent cleaning operations | Any organic solvent cleaning performed outside a degreaser during the production, repair, maintenance, or servicing of parts, products, tools, machinery, equipment, or in general work areas at stationary sources. Also applies to the storage and disposal of all solvents and waste solvent materials at stationary sources | Persons who use VOC-containing materials in solvent cleaning operations during the production, repair, maintenance or servicing of parts, products, tools, machinery, or equipment, or in general work areas, and to all persons who store and dispose of VOC-containing materials used in solvent cleaning. Also applies to sellers of VOC-containing materials for use in solvent cleaning operations, and to all persons who use VOC-containing materials for the sterilization of food manufacturing and processing equipment | Solvent cleaning operations including wipe cleaning, used to clean or dry metal and non-metal surfaces typically using a cold, vapor or conveyORIZED solvent cleaner | Any person who performs solvent cleaning activities, and any person who manufactures or supplies solvents for use in solvent cleaning activities |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1171 – Solvent Cleaning Operations (Amended 5/1/09) | SJVAPCD Rule 4663 – Organic Solvent Cleaning, Storage, and Disposal (Amended 9/20/07) | SMAQMD Rule 466 – Solvent Cleaning (Amended 10/28/10) | BAAQMD Rule 8-16 – Solvent Cleaning Operations (Amended 10/16/02) | VCAPCD Rule 74.6 – Surface Cleaning and Degreasing (Amended 11/10/20) |
|-------------------------------|---|---|--|---|--|
| Exemptions | <ul style="list-style-type: none"> • Cleaning operations using a solvent containing no more than 25 g/L of material • Medical device and pharmaceutical facilities using up to 1.5 gal/day of solvent • Cleaning of adhesive application equipment used for thin metal laminating operations provided the clean-up solvent used contains no more than 950 g VOC/L • Cleaning of electronic or electrical cables provided the clean-up solvent used contains no more than 400 g VOC/L • Touch up cleaning performed on printed circuit boards provided the solvent used contains no more than 800 g VOC/L • Other exemptions apply | <ul style="list-style-type: none"> • Operator using ≤55 gal of organic solvent products in all source operations subject to Rule 4663 in a stationary source, in any rolling, consecutive 365-day period • Cleaning of architectural coating application equipment provided the cleaning solvent used does not exceed 950 g VOC/L • Other exemptions apply | <ul style="list-style-type: none"> • Cleaning using solvents that contain ≤25 g/L • Cleaning of sterilization ink indicating equipment provided the solvent usage is <1.5 gal/day • Other exemptions apply | <ul style="list-style-type: none"> • Equipment or operations that use unheated solvent and that contain <1 gal of solvent • Other exemptions apply | Use of solvent with a VOC content of 25 g/L or less |
| Emission Control Requirements | <ul style="list-style-type: none"> • Overall 85% control efficiency • Output concentration <50 ppm | <ul style="list-style-type: none"> • Overall 85% control efficiency • Output concentration <50 ppm | <ul style="list-style-type: none"> • Overall 85% control efficiency • Output concentration <50 ppm | None listed | <ul style="list-style-type: none"> • Overall 85% control efficiency |

| Requirements | VOC Limits, g/L | | | | | |
|--------------|---|----------------------------|-----------------------------|--------------------------|----------------------------|-----------------------------|
| | Category | South Coast AQMD Rule 1171 | SJVAPCD Rule 4663 Rule 4607 | SMAQMD Rule 466 Rule 450 | BAAQMD Rule 8-16 Rule 8-20 | VCAPCD Rule 74.6 Rule 74.19 |
| | Product cleaning during manufacturing process or surface preparation for coating, adhesive, or ink application VOC limits | | | | | |
| | General | 25 | 25 | 25 | - | 25 |
| | Electrical apparatus components & electronic components | 100 | 100 | 100 | - | 100 |
| | Medical devices & pharmaceuticals | 800 | 800 | 800 | - | 800 |
| | Repair & maintenance cleaning | | | | | |
| | General | 25 | 25 | 25 | - | 25 |
| | Electrical apparatus components & electronic components | 100 | 100 | 100 | - | 100 |
| | Medical devices & pharmaceuticals – Tools, equipment & machinery | 800 | 800 | 800 | - | 800 |
| | Medical devices & pharmaceuticals – General work surfaces | 600 | 600 | 600 | - | 600 |
| | Cleaning of coatings or adhesives application equipment | 25 | 25 | 25 | - | 25 |
| | Cleaning of ink application equipment | | | | | |
| | General | 25 | 25 | 25 | 25 | 25 |
| | Flexographic printing | 25 | 25 | 25 | 25 | 25 |
| | Gravure printing – Publication | 100 | 100 | - | 100 | 100 |
| | Gravure printing – Packaging | 25 | 25 | - | 25 | 25 |
| | Lithographic (offset) or letter press printing – Roller wash, blanket wash, & on-press components | 100 | 100 | 100 | 100 | 100 |
| | Lithographic (offset) or letter press printing – Removable press components | 25 | 25 | 25 | - | 25 |
| | Screen printing | 100 | 100 | 100 | 100 | - |
| | Ultraviolet ink/electron beam ink application equipment (except screen printing) | 100 | 100 | 100 | 100 | 100 |
| | Specialty flexographic printing | 100 | 100 | 100 | 100 | 100 |
| | Cleaning of polyester resin application equipment | 25 | - | - | - | 25 |

3. Coatings and Related Processes

a. Overview

Major source category 230 – Coatings and Related Processes includes various VOC-emitting operations including auto refinishing, marine coatings, paper coatings, fabric coatings, metal parts and products coatings, wood furniture and fabricated products coatings, plastic parts coatings, semiconductor coatings, aircraft and aerospace coatings, thinning and cleanup solvent uses, preparation solvent uses, and other coating and related processes. This source category accounts for 21.01 tpd of VOC and zero NOx in the Basin’s 2037 emissions inventory as shown in Table 4-26.

**TABLE 4-26
COATINGS AND RELATED PROCESSES EMISSIONS BASED ON 2037 SUMMER PLANNING INVENTORY**

| Source Category | VOC (tpd) |
|---|--------------|
| 216 – Preparation Solvents | 0.11 |
| 218 – Auto Refinishing | 9.88 |
| 220 – Marine Coatings | 0.18 |
| 222 – Paper Coatings | 0.34 |
| 226 – Metal Furniture and Fixture Coatings | 0.00 |
| 228 – Can and Coil Coatings | 0.68 |
| 230 – Metal Parts and Products Coatings | 6.19 |
| 232 – Wood Furniture and Fabricated Products Coatings | 1.38 |
| 234 – Flatwood Products | 0.03 |
| 236 – Plastic Parts | 0.42 |
| 237 – Semiconductor Coatings | 0.01 |
| 238 – Aircraft and Aerospace Coatings | 1.73 |
| 240 – Thinning and Cleanup Solvent Uses | 0.02 |
| 995 – Other | 0.04 |
| Total | 21.01 |

b. Evaluation

i. Metal Products Coating Operations

South Coast AQMD Rule 1107 applies to metal coatings and is compared with applicable rules in other air districts in Table 4-27. The requirements and VOC limits for the metal coatings rules in South Coast AQMD, BAAQMD, SJVAPCD, and SMAQMD are identical for the most part. BAAQMD, SJVAPCD, and SMAQMD allow some annual non-compliant material use that South Coast AQMD does not. Also, BAAQMD and SMAQMD exempt Touch Up and Repair coatings from VOC limits. Staff did not identify any potential contingency measures for metal products coating operations since evaluation of South Coast AQMD Rule 1107 revealed that it is the most stringent. Rule 1107 is currently undergoing an amendment process with the primary intent of phasing out toxic compounds, para-Chlorobenzotrifluoride (pCBTF) and tert-Butyl Acetate (t-BAC),

which may result in temporary VOC emission increases to accommodate reformulation.⁴⁵ The public health benefits from removing these carcinogens far outweigh any short-term emission increases. As of January 2025, to the best of staff’s knowledge, South Coast AQMD is the only air district actively pursuing the phase-out of pCBtF and t-BAc, positioning it as a leader in this effort. As part of the rule amendment process, staff is also expected to assess the feasibility of lowering VOC limits at future compliance dates which will likely result in an overall reduction in VOC emissions. The phase out of pCBtF and t-Bac and lowering VOC limits will be implemented as soon as feasible following the adoption of the rule, therefore, no contingency measures are proposed for this category.

**TABLE 4-27
RULE 1107 COMPARATIVE ANALYSIS**

| Rule Element | South Coast AQMD Rule 1107 – Coating of Metal Parts and Products (Amended 1/6/23) | SJVAPCD Rule 4603 – Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts (Amended 9/17/09) | BAAQMD Rule 8-19 – Surface Coating of Miscellaneous Metal Parts and Products (Amended 10/16/02) | SMAQMD Rule 451 – Surface Coating of Miscellaneous Metal Parts and Products (Amended 10/28/10) |
|---------------|--|--|--|---|
| Applicability | Coating of metal parts and products excluding aerospace assembly, magnet wire, marine craft, motor vehicle, metal container, and coil coating operations, or for architectural components coated at the structure site | Surface coating operations of metal parts or products, large appliances parts or products, metal furniture excluding aerospace, motor vehicle assembly | Miscellaneous coating operations on metal parts and products | Miscellaneous coating operations on metal parts and products |
| VOC Limits | VOC limits by individual coating category; use of add-on controls allowed in lieu of VOC limits | VOC limits by individual coating category; use of add-on controls allowed in lieu of VOC limits; 55 gallons per year of | VOC limits by individual coating category; use of add-on controls allowed in lieu of VOC limits; 100 | VOC limits by individual coating category; use of add-on controls allowed in lieu of VOC limits; 55 |

⁴⁵ South Coast AQMD, Proposed Amended Rule 1107 – Coating of Metal Parts and Products.
<https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-1107>

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1107 – Coating of Metal Parts and Products (Amended 1/6/23) | SJVAPCD Rule 4603 – Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts (Amended 9/17/09) | BAAQMD Rule 8-19 – Surface Coating of Miscellaneous Metal Parts and Products (Amended 10/16/02) | SMAQMD Rule 451 – Surface Coating of Miscellaneous Metal Parts and Products (Amended 10/28/10) |
|---|---|--|---|--|
| | | non-compliant coatings allowed | gallons per year of non-compliant coatings allowed | gallons per year of non-compliant coatings allowed |
| VOC Content Limits (g/L) Air-Dried/Baked | | | | |
| General One Component | 275 | 340/275 | 340/275 | 340/275 |
| General Multi-Component | 340/275 | 340/275 | 340/275 | 340/275 |
| Military Specification | 340/275 | 340/275 | 340/275 | - |
| Etching Filler | 420 | - | - | 420 |
| Solar Absorbent | 420/360 | 420/360 | 420/360 | 420/360 |
| Heat-Resistant | 420/360 | 420/360 | 420/360 | 420/360 |
| Extreme High-Gloss | 340/360 | 420/360 | 420/360 | 420/360 |
| Metallic | 420/360 | 420/360 | 420/360 | 420 |
| Extreme Performance | 420/360 | 420/360 | 420 | 420/360 |
| Prefabricated Architectural One-Component | 275 | 340/275 | 340/275 | 420/275 |
| Prefabricated Architectural Multi-Component | 340/275 | 340/275 | 340/275 | 420/275 |
| Touch Up | 420/360 | 420/360 | Exempt | Exempt |
| Repair | 420/360 | 420/360 | Exempt | Exempt |
| Silicone Release | 420 | 420 | 420 | 420 |
| High-Performance Architectural | 420 | - | 420 | 420 |

| Rule Element | South Coast AQMD Rule 1107 – Coating of Metal Parts and Products (Amended 1/6/23) | SJVAPCD Rule 4603 – Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts (Amended 9/17/09) | BAAQMD Rule 8-19 – Surface Coating of Miscellaneous Metal Parts and Products (Amended 10/16/02) | SMAQMD Rule 451 – Surface Coating of Miscellaneous Metal Parts and Products (Amended 10/28/10) |
|-----------------------------|--|--|--|--|
| Camouflage | 420/360 | 420/360 | 420/360 | 420/360 |
| Vacuum-Metalizing | 420 | - | 420/360 | - |
| Mold-Seal | 420 | - | - | - |
| High-Temperature | 420 | - | 420 | - |
| Electric-Insulating Varnish | 420 | - | - | 340/275 |
| Pan Backing | 420 | - | - | - |
| Pretreatment Coatings | 420 | 420 | 420 | 420 |
| Transfer Efficiency | Use of HVLP [^] or equivalent transfer efficiency | Use of HVLP [^] or equivalent transfer efficiency | Use of HVLP [^] or equivalent transfer efficiency | Use of HVLP [^] or equivalent transfer efficiency |
| Work Practices | Storage, use, and disposal of coatings and waste; VOC limits and work practices for solvent cleaning | Storage, use, and disposal of coatings and waste; VOC limits and work practices for solvent cleaning | Storage, use, and disposal of coatings and waste; VOC limits and work practices for solvent cleaning | Storage, use, and disposal of coatings and waste; VOC limits and work practices for solvent cleaning |

[^]High-Volume, Low-Pressure (HVLP)

ii. Aerospace Coating Operations

South Coast AQMD Rule 1124 applies to aerospace coating operations and is compared with the applicable rules in other air districts in Table 4-28.

The requirements and VOC limits for the metal coatings rules in South Coast AQMD and SJVAPCD are identical for the most part. SJVAPCD includes higher VOC limits for specialty categories (e.g., Ablative, Bearing, Caulking and Smoothing, Chemical Acid Resistance, Electric Interference, Intermediary Release, Lacquer, Part Marking, Rocket Motor Nozzle, Screen Print Ink, Silicone Insulation, Specialized Function, Thermal Control, Epoxy Polamide, and Wet Fastener). South Coast AQMD’s rule is more stringent with respect to these specialty categories.

BAAQMD’s regulation was last updated in 1995 and generally has higher limits and fewer categories. High volume categories in South Coast AQMD are more stringent but there are a few specialty categories where BAAQMD may have a lower limit. Staff reviewed the availability of products in those categories and found that products were not available for commercial, military, and spacecraft at the VOC contents specified in BAAQMD’s rule for all applications. In some cases, the products relied on the European Union definition of VOC which is not applicable to South Coast AQMD. Additionally, these products were not found to be usable in spray, dip, and brush applications which are typical of aerospace operations. SMAQMD has fewer specialty categories resulting in lower limits for certain applications but mostly higher limits across the board. Like the BAAQMD, SMAQMD’s rule has not been updated since 2008.

South Coast AQMD Rule 1124 generally has the most stringent limits in place. Rule 1124 is currently being amended with the primary intent of phasing out toxic compounds, pCBtF and t-BAc, which may temporarily increase VOC emissions to accommodate reformulation.⁴⁶ However, the public health benefits of removing these carcinogens far outweigh any short-term emissions impact. As of January 2025, to the best of staff’s knowledge, South Coast AQMD is the only air district actively pursuing the phase-out of pCBtF and t-BAc, positioning it as a leader in this effort. As part of the rule amendment process, staff will also evaluate the feasibility of lowering VOC limits at future compliance dates which will likely achieve overall VOC reductions. The phase out of pCBtF and t-Bac and lowering VOC limits will be implemented as soon as feasible following the adoption of the rule, therefore, no contingency measures are proposed for this category.

**TABLE 4-28
RULE 1124 COMPARATIVE ANALYSIS**

| Rule Element | South Coast AQMD Rule 1124 – Aerospace Assembly Line Coating Operations (Amended 9/21/01) | SJVAPCD Rule 4605 – Aerospace Assembly and Component Coatings (Amended 6/16/11) | BAAQMD Rule 8-29 – Aerospace Assembly and Component Coating Operations (Amended 12/20/95) | SMAQMD Rule 456 – Aerospace Assembly and Component Coating Operations (Amended 10/23/08) |
|---------------|---|---|--|--|
| Applicability | Assembly and component manufacturing operations | Manufacturing, assembly, coating, and cleaning of aerospace components | Surface preparation and coating of aerospace components and cleanup of aerospace coating equipment | Coatings of aerospace components including coating removal, surface preparation and cleaning |

⁴⁶ South Coast AQMD, Proposed Amended Rule 1124 – Aerospace Assembly and Component Manufacturing Operations. <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-1124>

| Rule Element | South Coast AQMD Rule 1124 – Aerospace Assembly Line Coating Operations (Amended 9/21/01) | SJVAPCD Rule 4605 – Aerospace Assembly and Component Coatings (Amended 6/16/11) | BAAQMD Rule 8-29 – Aerospace Assembly and Component Coating Operations (Amended 12/20/95) | SMAQMD Rule 456 – Aerospace Assembly and Component Coating Operations (Amended 10/23/08) |
|--|---|--|---|---|
| VOC Limits | VOC limits by individual coating category; use of add-on controls allowed if lieu of VOC limits | VOC limits by individual coating category; use of add-on controls allowed if lieu of VOC limits; 20 gallons per year of non-compliant coatings allowed | VOC limits by individual coating category; use of add-on controls allowed if lieu of VOC limits; 100 gallons per year of non-compliant coatings allowed | VOC limits by individual coating category; use of add-on controls allowed if lieu of VOC limits |
| General Primer | 350 | 350 | 350 | 350 |
| Low-Solids Corrosion Resistant Primer | 350 | 350 | - | - |
| Pretreatment Primer | 780 | 780 | - | 780 |
| Rain Erosion Resistant Coating Compatible Primer | 850 | N/A | - | - |
| Adhesion Promoter | 250 | 850 | - | 780 |
| Adhesive Bonding Primer – New Aircraft | 250 | 250 | 850 | - |
| Adhesive Bonding Primer – Military Aircraft | 805 | 805 | - | - |
| Adhesive Bonding Primer – Remanufactured Commercial Aircraft Parts | 805 | 805 | - | - |
| Adhesive Bonding Primer – Sonic and Acoustic Applications | 805 | 805 | - | - |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1124 – Aerospace Assembly Line Coating Operations (Amended 9/21/01) | SJVAPCD Rule 4605 – Aerospace Assembly and Component Coatings (Amended 6/16/11) | BAAQMD Rule 8-29 – Aerospace Assembly and Component Coating Operations (Amended 12/20/95) | SMAQMD Rule 456 – Aerospace Assembly and Component Coating Operations (Amended 10/23/08) |
|--|---|---|---|--|
| Adhesive Bonding Primer | 250 | 250 | 780 | - |
| Topcoat | 420 | 420 | 420/340 | - |
| Clear Topcoat | 520 | 520 | - | - |
| Unicoat | 420 | 420 | - | - |
| Wing Coating | 750 | 750 | - | - |
| Impact Resistant Coating | 420 | 420 | - | - |
| High-Temperature | 850 | 850 | 720 | 420 |
| Antichafe | 600 | 600 | - | - |
| Rain Erosion Resistant Coating | 800 | 800 | - | 800 |
| Conformal | 750 | 750 | 420 | 600 |
| Optical Anti Reflective | 700 | 700 | - | - |
| Scale Inhibitor | 880 | 880 | - | - |
| Metallized Epoxy | 700 | 740 | - | - |
| Electric or Radiation Effect | 800 | 800 | 800 | 600 |
| Temporary Protective | 250 | 250 | 250 | 250 |
| Fuel Tank | 420 | 420 | 720 | 650 |
| Mold Release | 780 | 780 | - | 762 |
| Flight Test – Missiles | 420 | 420 | - | 420 |
| Flight Test – All Others | 840 | 600 | - | 420 |
| Fire Resistant - Commercial | 650 | 650 | - | 600 |
| Fire Resistant – Military | 970 | N/A | - | 600 |
| Wire Coatings – Phospate Ester Resistant Ink | 925 | 925 | - | - |
| Wire Coatings – Other | 420 | 420 | - | - |

| Rule Element | South Coast AQMD Rule 1124 – Aerospace Assembly Line Coating Operations (Amended 9/21/01) | SJVAPCD Rule 4605 – Aerospace Assembly and Component Coatings (Amended 6/16/11) | BAAQMD Rule 8-29 – Aerospace Assembly and Component Coating Operations (Amended 12/20/95) | SMAQMD Rule 456 – Aerospace Assembly and Component Coating Operations (Amended 10/23/08) |
|--|---|---|---|--|
| Space Vehicle – Electrostatic Discharge Protection | 800 | 800 | - | 880 |
| Space Vehicle - Other | 1000 | 1000 | - | 1000 |
| Non Structural Adhesive | 250 | 250 | - | 600 |
| Structural Adhesive - Autoclavable | 50 | 50 | - | 600 |
| Structural Adhesive – Non-Autoclavable | 850 | 850 | - | 600 |
| Space Vehicle Adhesive | 800 | 800 | - | 600 |
| Fuel Tank Adhesive | 620 | 620 | - | 600 |
| Fastener Sealant | 675 | 600/675 | 600 | 600 |
| Extrudable, Rollable or Brushable Sealant | 600 | 280/600 | 600 | 600 |
| Other Sealant | 600 | N/A | - | 600 |
| Maskant for Chemical Processing | 250 | 250 | - | - |
| Maskant for Chemical Milling Type 1 | 250 | 250 | - | 622 |
| Maskant for Chemical Milling Type II | 160 | 250 | - | 160 |
| Photolithographic Maskant | 850 | - | - | 850 |
| Touch Up, Line Sealer Maskant | 750 | - | - | 850 |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1124 – Aerospace Assembly Line Coating Operations (Amended 9/21/01) | SJVAPCD Rule 4605 – Aerospace Assembly and Component Coatings (Amended 6/16/11) | BAAQMD Rule 8-29 – Aerospace Assembly and Component Coating Operations (Amended 12/20/95) | SMAQMD Rule 456 – Aerospace Assembly and Component Coating Operations (Amended 10/23/08) |
|---|--|--|--|--|
| Fastener Installation Solid-Film Lubricant | 880 | 880 | - | 880 |
| Fastener Installation Dry Lubricative Material | 675 | 880 | - | - |
| Fastener Manufacturing Solid Film Lubricant | 250 | 250 | - | 880 |
| Fastener Manufacturing Dry Lubricative Material | 120 | 120 | - | - |
| Fastener Manufacturing Barrier Coating | 420 | 250 | - | - |
| Non-Fastener Solid Film Lubricant | 880 | 880 | - | 880 |
| Non-Fastener Dry Lubricative Material | 675 | 675 | - | - |
| Transfer Efficiency | Use of HVLP or equivalent transfer efficiency | Use of HVLP or equivalent transfer efficiency | Use of HVLP or equivalent transfer efficiency | Use of HVLP or equivalent transfer efficiency |
| Work Practices | Storage, use, and disposal of coatings and waste; VOC limits and work practices for solvent cleaning | Storage, use, and disposal of coatings and waste; VOC limits and work practices for solvent cleaning | Storage, use, and disposal of coatings and waste; VOC limits and work practices for solvent cleaning | Storage, use, and disposal of coatings and waste; VOC limits and work practices for solvent cleaning |
| Surface Cleaning | 200 g/L or 45 mm Hg | 200 g/L or 45 mm Hg | None | 200 g/L or 45 mm Hg |

| Rule Element | South Coast AQMD Rule 1124 – Aerospace Assembly Line Coating Operations (Amended 9/21/01) | SJVAPCD Rule 4605 – Aerospace Assembly and Component Coatings (Amended 6/16/11) | BAAQMD Rule 8-29 – Aerospace Assembly and Component Coating Operations (Amended 12/20/95) | SMAQMD Rule 456 – Aerospace Assembly and Component Coating Operations (Amended 10/23/08) |
|--------------|---|---|---|--|
| Stripping | 300 g/L or 9.5 mm Hg | 300 g/L or 9.5 mm Hg | 400 g/L or 10 mm Hg | 300 g/L or 9.5 mm Hg |

iii. Wood Products Coating Operations

South Coast AQMD Rule 1136 applies to the wood products coating operations and is compared with other air district rules in Table 4-29. Table 4-30 summarizes and compares the VOC limits for wood coatings in South Coast AQMD with the rules in other air districts.

**TABLE 4-29
CONTROL MEASURES IMPLEMENTED BY SOUTH COAST AQMD AND OTHER DISTRICTS FOR
WOOD COATING**

| Rule | Applicability | Control Measure |
|---|--|---|
| South Coast AQMD Rule 1136 – Wood Products Coatings (Amended 6/14/96) | Applies to the application of coatings or strippers to, and surface preparation of, any wood products, including furniture, cabinets, shutters, frames, and toys | <ul style="list-style-type: none"> • VOC content limit ranges from 120 to 750 g/L VOC (e.g., Low-Solid Stains limit 120 g/L) • Averaging provisions and add-on control are allowed • At least 65% transfer efficiency is required, otherwise the use of additional control equipment must be used (e.g., HVLP equipment) |
| BAAQMD Rule 8-32 – Wood Products Coatings (Amended 8/5/09) | Applies to the coating of wood products, including surface preparation, application of coatings and cleanup | <ul style="list-style-type: none"> • VOC content limit ranges from 120 to 550 g/L VOC (No mold seal application limit) (e.g., Low-Solid Stains limit 120 g/L) • Emissions to the atmosphere must be controlled with an abatement device efficiency of at least 85% instead of complying with VOC content limits |
| MDAQMD Rule 1114 – Wood Products Coating Operations (Amended 8/24/20) | Applies to wood products coating application operations | <ul style="list-style-type: none"> • VOC content limit ranges from 120 to 750 g/L VOC (e.g., Low-Solid Stains limit 120 g/L) • Allows alternative in lieu of complying with the VOC content limits with a capture and control system of combined efficiency of at least 90% |
| SJVAPCD Rule 4606 – Wood Products and Flat Wood Paneling Products Coating Operations (Amended 10/16/08) | Applies to the application of coatings to wood products, including furniture, cabinets, flat wood paneling, and custom replica furniture | <ul style="list-style-type: none"> • VOC content limit ranges from 120 to 750 g/l VOC (e.g. Low -Solid Stains limit 120 g/L) • Allows alternative in lieu of complying with the VOC content limits with control system of efficiency of at least 85% by weight for wood product coating |

**TABLE 4-30
RELEVANT VOC CONTENT LIMITS IN COATINGS BY SOUTH COAST AQMD AND OTHER DISTRICT FOR
WOOD COATINGS**

| Type of Coating | South Coast AQMD Rule 1136 VOC Limit, g/L | MDAQMD Rule 1114 VOC Limit, g/L | SJVAPCD Rule 4606 VOC Limit, g/L | BAAQMD Rule 8-32 VOC Limit, g/L |
|--|---|---|--|---------------------------------------|
| Clear Sealers | 275 | 275 | 275 | 275 |
| Clear Topcoat | 275 | 275 | 275 | 275 |
| Fillers | 275 (All Products) | 275 (New Products) 500 (Refurbished) | 275 (All Products) | 275 (All Products) |
| High-Solids Stain | 350 (All Products) | 240 (New Products) 700 (Refurbished) | 240 (All Products) | 350 (All Products) |
| Inks | 500 | 500 | 500 | 500 |
| Low-Solid Stain | 120 | 120 | 120 | 120 |
| Mold-Seal Coating | 750 | 750 | 750 | - |
| Multi-colored Coatings | 275 (All Products) | 275 (New Products) 700 (Refurbished) | 275 (All Products) | 275 (All Products) |
| Pigmented Primers, Sealers, & Undercoats | 275 | 275 | 275 | 275 |
| Pigmented Topcoats | 275 | 275 | 275 | 275 |

The control measures identified rely on similar control measures among South Coast AQMD and other air districts as shown in Table 4-29. Furthermore, the requirements set by Rule 1136 are very similar to those identified in MDAQMD, SJVAPCD, and BAAQMD which include similar VOC content limits for wood coatings application and an alternative to install a control emission system in lieu of meeting the VOC content limits.

South Coast AQMD's Rule 1136 requirements are generally as stringent as those in other districts' rules, although SJVAPCD Rule 4606 contains a more stringent high-solids stain limit (240 g/L vs. 350 g/L) for all products. Rule 1136 is currently undergoing an amendment process with the primary intent of phasing out toxic compounds, pCBtF and t-BAc. Although this may lead to a temporary increase in VOC emissions due to reformulation,⁴⁷ the significant public health benefits of eliminating these carcinogens far outweigh any short-term VOC emission increases. As of January 2025, to the best of staff's knowledge, South Coast AQMD is the only air district actively pursuing the phase-out of pCBtF and t-BAc, positioning it as a leader in this effort. As part of the rule amendment process, staff will also assess the feasibility of lowering VOC limits at future compliance dates, which is expected to reduce VOC emissions overall. The phase out of pCBtF and t-Bac and lowering VOC limits will be implemented as soon as feasible following the adoption of the rule, therefore, no contingency measures are proposed for this category.

⁴⁷ South Coast AQMD, Proposed Amended Rule 1136 – Wood Products Coatings.
<https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-1136>

iv. Flatwood Products

South Coast AQMD Rule 1104 applies to this source category. BAAQMD Rule 8-23 and SJVAPCD Rule 4606 also contain requirements specific to flatwood products. While other air districts implement general wood product coating rules, these rules do not have requirements specific to flatwood products. For an evaluation of general wood product coating rules, refer to the previous section.

Table 4-31 summarizes the control measures staff considered for this source category comparative analysis. South Coast AQMD Rule 1104 has the most stringent requirements and, therefore, no contingency measures are proposed.

TABLE 4-31
SOUTH COAST AQMD RULE 1104 COMPARATIVE ANALYSIS

| Rule Element | South Coast AQMD Rule 1104 – Wood Flat Stock Coating Operations (Amended 8/13/99) | BAAQMD Rule 8-23 – Coating of Flat Wood Paneling and Wood Flat Stock (Amended 12/20/95) | SJVAPCD Rule 4606 – Wood Products and Flat Wood Paneling Products Coating Operations (Amended 10/16/08) |
|---|--|--|---|
| Applicability | Applies to all persons applying coatings, inks, and adhesives to wood flat stock for the purpose of manufacturing a finished wood panel intended for attachment to the inside walls of buildings or a finished exterior wood siding intended for use in construction | Application of coatings and adhesives to flatwood panels and wood flat stock | Applies to operators of flat wood paneling coating operations |
| Application Method | Coatings, adhesives, or inks must be applied by: <ul style="list-style-type: none"> • Flow Coater, Roll Coater, or Dip Coater • Hand Application • HVLP Application • Electrostatic Application | No restrictions | Coatings, adhesives, or inks must be applied by: <ul style="list-style-type: none"> • Flow Coater, Roll Coater, or Dip Coater • Hand Application • HVLP Application • Electrostatic Application • Detailing or touch-up guns • Other methods demonstrated to achieve at least 65% transfer efficiency |
| Requirements | Comply with the specified VOC emission limit or operate an approved emission control device that reduces emissions by at least 95%, or the output of the control device is less than 50 ppm carbon, and has a collection efficiency of at least 90% | Comply with the specified VOC emission limit or operate an approved emission control device with a control efficiency of 90% | Comply with the specified VOC emission limit or operate an approved emission control device with a control efficiency of 90% |
| Emission Limit for coatings, inks, and adhesives in grams/liter, less | 250 | 250 | 250 |

| Rule Element | South Coast AQMD Rule 1104 – Wood Flat Stock Coating Operations (Amended 8/13/99) | BAAQMD Rule 8-23 – Coating of Flat Wood Paneling and Wood Flat Stock (Amended 12/20/95) | SJVAPCD Rule 4606 – Wood Products and Flat Wood Paneling Products Coating Operations (Amended 10/16/08) |
|----------------------------|---|---|---|
| water and exempt compounds | | | |
| Exemptions | <ul style="list-style-type: none"> • Laminating of fiberglass, metal, or plastic sheets to wood panels that is subject to the provisions of Rule 1168 • Coating of wood panels for furniture end use that is subject to the provisions of Rule 1136 • Coating of wood panels for aircraft that is subject to the provisions of Rule 1124 | <ul style="list-style-type: none"> • Coatings subject to Regulation 8, Rule 32 • Coatings subject to Regulation 8, Rule 3 | <ul style="list-style-type: none"> • Operators whose total actual VOC emissions from flat wood paneling coating operations are less than 15 pounds per day of VOC are subject to the general wood product coatings emission limits (see previous section for analysis) |

v. Solvent Thinning Operations

Consumer products are primarily regulated under the CARB Consumer Products Regulatory Program.⁴⁸ South Coast AQMD Rule 1143 – Consumer Paint Thinners and Multi-Purpose Solvents was adopted in March 2009 and last amended on December 3, 2010 to reduce VOC emissions from paint thinners and multi-purpose solvents from products not yet regulated by CARB. South Coast AQMD Rule 1143 was compared to BAAQMD’s Rule 8-4 – General Solvent and Coating Operations and SJVAPCD’s Rule 4661 – Organic Solvents in Table 4-32.

In September 2009, CARB adopted an amendment to include multi-purpose solvents and paint thinners under the consumer products regulation. Since CARB’s consumer products regulation is statewide, CARB’s VOC limits for multi-purpose solvents and paint thinners preempt South Coast AQMD’s Rule 1143 VOC limits and are in effect for the Basin. More details can be found under the “Solvent Evaporation – Consumer Products” section of this Plan. Additionally, an infeasibility justification for consumer products regulated under CARB’s authority is presented in Appendix B: CARB’s Area Source Infeasibility Justification.

⁴⁸ CCR Title 17 § 94509

TABLE 4-32
SOUTH COAST AQMD RULE 1143 COMPARATIVE ANALYSIS

| Rule Element | South Coast AQMD Rule 1143 – Consumer Paint Thinners and Multi-Purpose Solvents (Amended 12/3/10) | BAAQMD Rule 8-4 – General Solvent and Surface Coating Operations (Amended 10/16/02) | SJVAPCD Rule 4661 – Organic Solvents (Amended 9/20/07) |
|---------------|--|---|---|
| Applicability | Users, suppliers, and manufacturers of consumer paint thinners and multi-purpose solvents | Solvent and Coating Operations | Operations that use organic solvents |
| Requirements | <ul style="list-style-type: none"> • Consumer paint thinner – 25 g/L (2.5%) • Consumer multi-purpose solvent – 25 g/L (2.5%) | Surface coating – 420 g/L | Refers to Rule 4663 for VOC limits (which are \geq 25 g/L – see Table 4-25.3) |
| Exemptions | <ul style="list-style-type: none"> • Solvents designated for cleanup of polyaspartic and polyurea coatings application equipment • Thinners designated for Industrial Maintenance, Zinc IM Primers, and High Temperature Coatings • Artist solvents/thinners designated to reduce viscosity of, or remove, art coating compositions or components | Exemptions listed in Table 4-25.1 | Exemptions listed in Table 4-25.1 |

vi. Plastic, Rubber, Leather and Glass Coating Operations

South Coast AQMD Rule 1145 applies to plastic, rubber, leather and glass coating operations and is compared in Table 4-33 against applicable rules and guidance, which include U.S. EPA’s CTG for Miscellaneous Metal and Plastic Parts Coatings, Antelope Valley AQMD (AVAQMD) Rule 1145 – Plastic, Rubber, and Glass Coatings, and BAAQMD Rule 8-31 – Surface Preparation of Plastic Parts and Products. Table 4-34 shows the VOC limits for plastic coatings in these rules by South Coast AQMD and other air districts.

**TABLE 4-33
CONTROL MEASURES IMPLEMENTED BY SOUTH COAST AQMD AND OTHER DISTRICTS FOR
PLASTIC COATINGS**

| Rule | Applicability | Control Measure |
|---|---|--|
| South Coast AQMD Rule 1145 – Plastic, Rubber, Leather, and Glass Coatings (Amended 12/4/09) | Applies to the application of coatings to any plastic, rubber, leather, or glass products | <ul style="list-style-type: none"> • Sets VOC limits ranging from 50 to 800 g/L depending on coating category or allows alternative compliance by using air pollution control equipment that: <ul style="list-style-type: none"> - Reduces VOC emissions from an emission collection system by at least 95% by weight or the concentration of VOC in the output of the air pollution control device is less than 50 ppm; and - Collects at least 90% by weight of the VOC emissions generated • Requires High transfer coating equipment (e.g., HVLP) • Solvent cleaning operations must comply with Rule 1171 – Solvent Cleaning Operations |
| U.S. EPA CTG for Miscellaneous Metal and Plastic Parts Coatings (Revised 9/2008) | Applies to facilities that perform surface coating operations to metal & plastic parts | <ul style="list-style-type: none"> • States that recommended limits in South Coast AQMD Rule 1145 are more stringent than in other existing federal, state and local actions limiting VOC emissions. |
| AVAQMD Rule 1145 – Plastic, Rubber, and Glass Coatings (Amended 2/14/97) | Applies to the application of coatings to any plastic, rubber, or glass | <ul style="list-style-type: none"> • Sets VOC limits ranging from 275 to 800 g/L depending on coating category; or • Able to comply with by using air pollution control equipment: <ul style="list-style-type: none"> - The control device reduces VOC emissions from an emission collection system by |

| Rule | Applicability | Control Measure |
|---|---|--|
| | | at least 95% by weight or the concentration of VOC in the output of the air pollution control device is less than 50 ppm; and - The system, collects at least 90% by weight of the VOC emissions generated • Solvent cleaning operations must comply with Rule 1171 – Solvent Cleaning Operations • Requires High transfer coating equipment (e.g., HVLP) |
| BAAQMD Rule 8-31 – Surface Preparation and Coating of Plastic Parts and Products (Amended 10/16/02) | Applies to the surface preparation and coating of plastic parts and products, including polyester resin (fiberglass) products | • Sets VOC limit of 340 g/L of coating applied to plastic parts; or • Able to comply with by using air pollution abatement device with an efficiency of at least 85% |

**TABLE 4-34
RELEVANT VOC CONTENT LIMITS IN COATINGS BY SOUTH COAST AQMD AND OTHER DISTRICTS FOR PLASTIC COATINGS**

| Type of Coating | South Coast AQMD Rule 1145 VOC Limit, g/L | AVAQMD Rule 1145 VOC Limit, g/L | BAAQMD Rule 8-31 VOC Limit, g/L |
|--|---|---------------------------------|---------------------------------|
| Electrical dissipating and shock free coatings | 360 | 360 | 340 |
| General one-component coatings | 120 | 275 | 340 |
| General two-component coatings | 120 | 420 | 340 |
| Metallic coatings | 420 | 420 | 420 |
| Military specification one-component coatings | 340 | 340 | 340 |
| Military specification two-component coatings | 420 | 420 | 340 |
| Mold seal coatings | 750 | 750 | - |
| Multi-color coatings | 680 | 685 | - |
| Optical coatings | 50 | 800 | 800 |

The plastic coatings process controls identified fall into common categories. The requirements of the relevant South Coast AQMD rules are similar or more stringent in certain categories such as in general one-component coatings when compared with the requirements set by AVAQMD and BAAQMD as shown in Table 4-34. Furthermore, the 2008 CTG, released by the U.S. EPA, states that the South Coast AQMD recommended limits in Rule 1145 and Rule 1107 are more stringent than limits provided in other existing Federal, State, and local actions limiting VOC emissions from these coating categories. Due to the extensive size and diversity of regulated sources within the South Coast AQMD's jurisdiction, the facilities subject to South Coast AQMD's rules are considered representative of similar sources nationwide. The U.S. EPA recommends these limits as technologically and economically feasible for implementation across the country, implying that South Coast AQMD's rules are the most stringent. In all, the available control measures are already being implemented in the Basin and no contingency measures are proposed for this category.

vii. Motor Vehicle Assembly Line Coating Operations

South Coast AQMD Rule 1115 applies to this source category. Rule 1115 was last amended in March 2022 to address a Reasonably Available Control Technology (RACT) deficiency due to a less stringent VOC limit for Automobile and Light-Duty Truck Assembly Coatings compared to that specified in U.S. EPA's Control Techniques Guidelines. In addition, the VOC limits for several categories of coatings were lowered to match the stringency of other districts' rules.

Staff reviewed control measures for this source category implemented by South Coast AQMD and other state and local air agencies, including SJVAPCD Rule 4602, AVAQMD Rule 1151.1, and BAAQMD Rule 8-13. Table 4-35 summarizes the control measures staff considered for this source category comparative analysis.

TABLE 4-35
SOUTH COAST AQMD RULE 1115 COMPARATIVE ANALYSIS

| Rule Element | South Coast AQMD Rule 1115 – Motor Vehicle Assembly Line Coating Operations (Amended 3/4/22) | SJVAPCD Rule 4602 – Motor Vehicle Assembly Coatings (Amended 9/17/09) | BAAQMD Rule 8-13 – Light and Medium Duty Motor Vehicle Assembly Plants (Amended 12/20/95) | AVAQMD Rule 1151.1 – Motor Vehicle Assembly Coating Operations (Amended 6/20/17) |
|---------------|--|---|---|---|
| Applicability | An owner or operator engaged in assembly line coating operations conducted during the manufacturing of new motor vehicles and other automotive parts that are coated during the vehicle assembly process as well as during associated solvent cleaning operations. | Any person who applies VOC-containing coatings to new automobiles, light-duty trucks, heavier vehicles, and other parts coated along with these bodies or body parts during the assembly process, and associated solvent cleaning activities. | Light- and medium-duty motor vehicle assembly plants. | All Motor Vehicle Assembly Coating Operations that apply Coatings that contain VOC to new Motor Vehicles, new Light-Duty Trucks, new Heavier Vehicles and other parts that are coated along with these body or body parts during the vehicle assembly process and associated solvent cleaning activities. |
| Exemptions | The VOC emission and content limits do not apply to: <ul style="list-style-type: none"> • Wheel Topcoat Application • Antirust Coatings • Flexible Coatings • Plastic Parts | <ul style="list-style-type: none"> • Materials supplied in containers with a net volume of 16 fluid ounces or less, or a net weight of one pound or less. • Except record keeping requirements, the provisions of this rule shall not apply to an operation where the total VOC emissions from all motor vehicle assembly coating | None | <ul style="list-style-type: none"> • Any operation that is subject to the provisions of Rule 1151 - Motor Vehicle and Mobile Equipment Coating Operations • Materials supplied in containers with a net volume of 16 fluid ounces or less, or a net weight of 1 pound or less. • Except record keeping requirements, the |

| Rule Element | South Coast AQMD Rule 1115 – Motor Vehicle Assembly Line Coating Operations (Amended 3/4/22) | SJVAPCD Rule 4602 – Motor Vehicle Assembly Coatings (Amended 9/17/09) | BAAQMD Rule 8-13 – Light and Medium Duty Motor Vehicle Assembly Plants (Amended 12/20/95) | AVAQMD Rule 1151.1 – Motor Vehicle Assembly Coating Operations (Amended 6/20/17) |
|--------------------------------|---|---|--|--|
| | | <p>operations, including cleaning activities, at that facility are less than 6.5 kg/day (15 lb/day) before controls.</p> | | <p>provisions of this rule shall not apply to an operation where the total VOC emissions from all motor vehicle assembly coating operations, including cleaning activities, at that facility are less than 6.5 kg/day (15 lb/day) before controls.</p> |
| Alternative Compliance Options | <p>In lieu of complying with the VOC content limits, an owner or operator may:</p> <ul style="list-style-type: none"> complete an Alternative Emission Control Plan pursuant to Rule 108 (Alternative Emission Control Plans); or may use an approved emission control system for reducing VOC emissions. The approved emission control system shall reduce the VOC emissions by an equivalent or greater | <p>In lieu of complying with VOC emission limits, coating application, and organic solvent cleaning requirements, an operator may use a VOC emission control system that meets the following requirements:</p> <ul style="list-style-type: none"> The VOC emission control system shall be approved by the APCO. The VOC emission control system shall achieve an overall control efficiency of at least 90% by weight. | <p>In lieu of complying with VOC emissions limits for electrodeposition, combined primer-surfacer and topcoat, and off-line coatings, an abatement device with at least 90% abatement efficiency must be used.</p> | <p>In lieu of complying with the VOC content limits, an operator may use an Emission Control System that meets all of the following requirements:</p> <ul style="list-style-type: none"> The Emission Control System shall be approved in writing by the APCO. The approved Emission Control System shall achieve an overall capture and control efficiency of at least 90% by weight. Use of an Emission |

| Rule Element | South Coast AQMD Rule 1115 – Motor Vehicle Assembly Line Coating Operations (Amended 3/4/22) | SJVAPCD Rule 4602 – Motor Vehicle Assembly Coatings (Amended 9/17/09) | BAAQMD Rule 8-13 – Light and Medium Duty Motor Vehicle Assembly Plants (Amended 12/20/95) | AVAQMD Rule 1151.1 – Motor Vehicle Assembly Coating Operations (Amended 6/20/17) |
|------------------------------------|---|---|---|--|
| | <p>level to that which would have been achieved by complying with the content limits.</p> | <ul style="list-style-type: none"> Use of a VOC emission control system shall result in VOC emissions equal to or less than VOC emissions which would result from compliance with the applicable requirements. | | <p>Control System shall result in VOC emissions equal to or less than VOC emissions which would result from compliance with the applicable requirements.</p> |
| <p>Coating Application Methods</p> | <p>An owner or operator of an assembly line coating operation shall not apply coatings to any motor vehicle or any associated parts or components to a motor vehicle on an assembly line except by the use of one of the following methods:</p> <ul style="list-style-type: none"> Electrostatic application HVLP spray Brush, dip, or roller Spray gun application Any other automotive coating application methods approved by the Executive Officer capable of achieving equivalent or better transfer efficiency | <p>The operator shall apply coatings using one of the following methods:</p> <ul style="list-style-type: none"> Brush, dip, or roll coating Electrostatic application Electrodeposition Flow coating Continuous Coating Any coating method demonstrated to the APCO capable of achieving $\geq 65\%$ transfer efficiency HVLP spray equipment <ul style="list-style-type: none"> Spray equipment must meet HVLP equipment standards | <p>-</p> | <p>The operator shall apply Coatings using one of the following methods:</p> <ul style="list-style-type: none"> Brush, Dip or Roll Coating Electrostatic Application Flow Coating Continuous Coating HVLP spray Any other coating application method which is demonstrated to be capable of achieving equivalent or better transfer efficiency compared to HVLP spray. |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1115 – Motor Vehicle Assembly Line Coating Operations (Amended 3/4/22) | SJVAPCD Rule 4602 – Motor Vehicle Assembly Coatings (Amended 9/17/09) | BAAQMD Rule 8-13 – Light and Medium Duty Motor Vehicle Assembly Plants (Amended 12/20/95) | AVAQMD Rule 1151.1 – Motor Vehicle Assembly Coating Operations (Amended 6/20/17) | |
|---|--|--|---|---|--|
| | compared to HVLP spray. | | | | |
| Motor Vehicle Assembly Coatings | VOC Emission Limits | | | | |
| Electrodeposition primer operations (including application area, spray/rinse stations, and curing oven) | Solids turnover ratio (R_T) > 0.16 | 0.084 kg VOC/L of solids deposited | 0.084 kg VOC/L of coating solids | 0.145 kg VOC/L of coating applied, excluding water, unless emissions are controlled by an air pollution abatement device with an efficiency of at least 90% | 0.084 kg VOC/L of solids deposited |
| | $0.040 < R_T < 0.160$ | $0.084 \times 350 \times 0.160 - R_T$ kg VOC/L | $0.084 \times 350 \times 0.160 - R_T$ kg VOC/L | | $0.084 \times 350 \times 0.160 - R_T$ kg VOC/L |
| | $R_T < 0.040$ | No VOC limit | No VOC limit | | No VOC limit |
| Primer-surfacer operations (including application area, flash off area, and oven) | 1.44 kg VOC/L of solids deposited | 1.44 kg VOC/L of deposited solids on a daily weighted average basis as determined by following the procedures in the revised Automobile Topcoat Protocol | 1.80 kg VOC/L of applied coating solids from each primer surfacer operation | 1.44 kg VOC/L of solids deposited | |
| Topcoat operations (including application area, flash-off area, and oven) | 1.44 kg VOC/L of solids deposited | 1.44 kg VOC/L of deposited solids on a daily weighted average basis | 1.80 kg VOC/L of applied coating solids from each topcoat operation | 1.44 kg VOC/L of solids deposited | |
| Final repair operations | 0.580 kg VOC/L of coating, excluding water and exempt compounds | 0.58 kg VOC/liter, less water and less exempt solvents, on a daily weighted average basis or as an occurrence | 0.580 kg VOC/L of coating applied, excluding water, on a daily weighted average basis | 0.580 kg VOC/L of coating, excluding water and exempt compounds | |

| Rule Element | South Coast AQMD Rule 1115 – Motor Vehicle Assembly Line Coating Operations (Amended 3/4/22) | SJVAPCD Rule 4602 – Motor Vehicle Assembly Coatings (Amended 9/17/09) | BAAQMD Rule 8-13 – Light and Medium Duty Motor Vehicle Assembly Plants (Amended 12/20/95) | AVAQMD Rule 1151.1 – Motor Vehicle Assembly Coating Operations (Amended 6/20/17) |
|---|--|---|--|--|
| | | weighted average | | |
| Combined primer-surfacer and topcoat operations | 1.44 kg VOC/L of solids deposited | 1.44 kg VOC/L of deposited solids on a daily weighted average basis | - | 1.44 kg VOC/L of solids deposited |
| Flexible Parts Coatings | - | - | <p>A person shall not apply to any flexible part which has a VOC content in excess of the following limits, excluding water, unless emissions are controlled by an air pollution abatement device with 90% efficiency.</p> <ul style="list-style-type: none"> flexible primer: 490 grams/liter (4.1 lbs/gal) color topcoat: 450 grams/liter (3.8 lbs/gal) basecoat/clearcoat: 540 grams/liter (4.5 lbs/gal) | - |
| Spray Primer Operations | - | - | 1.80 kg VOC/L of applied coating solids from each spray primer operation. | - |
| Off-Line Coatings | - | - | 0.340 kg VOC/L of applied coatings, excluding water, unless emissions are controlled by an air pollution abatement device with 90% efficiency. | - |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1115 – Motor Vehicle Assembly Line Coating Operations (Amended 3/4/22) | SJVAPCD Rule 4602 – Motor Vehicle Assembly Coatings (Amended 9/17/09) | BAAQMD Rule 8-13 – Light and Medium Duty Motor Vehicle Assembly Plants (Amended 12/20/95) | AVAQMD Rule 1151.1 – Motor Vehicle Assembly Coating Operations (Amended 6/20/17) | |
|--|--|---|---|--|--------------------|
| VOC Content Limits (grams/liter) for Miscellaneous Materials Used at Motor Vehicle Assembly Coating Operations | Material Type | Rule 1115 | SJVAPCD Rule 4602 | BAAQMD Rule 8-13 | AVAQMD Rule 1151.1 |
| | Glass bonding primer | 900 | 900 | | 900 |
| | Adhesive | 250 | 250 | | 250 |
| | Cavity wax | 650 | 650 | | 650 |
| | Sealer | 650 | 650 | | 650 |
| | Deadener | 650 | 650 | | 650 |
| | Gasket/gasket sealing material | 200 | 200 | | 200 |
| | Underbody coating | 650 | 650 | | 650 |
| | Trunk interior coating | 650 | 650 | | 650 |
| | Bedliner | 200 | 200 | | 200 |
| | Weatherstrip adhesive | 750 | 750 | | 750 |
| | Lubricating wax/compound | 700 | 700 | | 700 |

Of the rules considered in this analysis, BAAQMD Rule 8-13 was the only rule that contained VOC emission limits for flexible parts coatings, spray primer operations, and off-line coatings. However, unlike other air districts, BAAQMD does not include VOC content limits for miscellaneous materials used in motor vehicle assembly operations. In addition, while BAAQMD Rule 8-13 does not explicitly list exemptions, it does not apply to the assembly of motorcycles and heavy-duty vehicles as defined in Section 1900, Title 13, California Code of Regulations. By contrast, South Coast AQMD Rule 1115 applies to the assembly of those vehicle classes. Overall, South Coast AQMD is just as stringent as other districts in regulating automotive coatings and no contingency measures are proposed.

viii. Motor Vehicle Non-Assembly Line Coating Operations

South Coast AQMD Rule 1151 applies to this source category. Note that this category is distinct from motor vehicle assembly line coating operations, which was discussed in the previous section.

Staff reviewed control measures for this source category implemented by South Coast AQMD and other state and local air agencies, including Santa Barbara County APCD (SBCAPCD) Rule 339, San Diego County APCD (SDAPCD) Rule 67.20.1, BAAQMD Rule 8-45, SJVAPCD Rule 4612, SMAQMD Rule 459, and CARB. Each jurisdiction has different rule structures, which can make direct comparison difficult. Tables 4-36 and 4-37 below summarize the control measures staff considered for this source category comparative analysis.

**TABLE 4-36
SOUTH COAST AQMD RULE 1151 COMPARATIVE ANALYSIS**

| Rule | Applicability | Control Measure |
|--|--|--|
| South Coast AQMD Rule 1151 – Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations (Amended 11/1/24) | Any person who supplies, sells, offers for sale, markets, manufactures, blends, packages, repackages, possesses or distributes any automotive coating, automotive coating component, or associated solvent for use within the South Coast AQMD, as well as any person who uses, applies, or solicits the use or application of any automotive coating, automotive coating component, or associated solvent within the South Coast AQMD | The rule contains various VOC content limits that apply to different types of automotive refinishing coatings based on use and purpose The VOC content limits can be achieved using the following control technologies: waterborne formulation and utilization of exempt compounds Rule provides an alternative compliance option allowing for the use of an approved emission control system, consisting of collection and control devices, only if the VOC emissions resulting from the use of non-compliant automotive coatings will be reduced to a level equivalent |

| Rule | Applicability | Control Measure |
|---|--|--|
| | | to or lower than that which would have been achieved by compliance with VOC content limits |
| SBCAPCD Rule 339 – Motor Vehicle and Mobile Equipment Coating Operations (Amended 6/19/08) | This rule is applicable to any person who supplies, sells, offers for sale, manufactures, or distributes any automotive coating or associated solvent for use within the jurisdiction, as well as any person who uses, applies, or solicits the use or application of any automotive coating or associated solvent within the jurisdiction. The purpose of this rule is to limit VOC emissions from coatings and solvents associated with the coating of motor vehicles, mobile equipment, and associated parts and components | <p>The rule contains various VOC content limits that apply to different types of automotive refinishing coatings based on use and purpose</p> <p>Rule provides an alternative compliance option allowing for the use of an approved emission control system, which achieves an overall control efficiency of at least 85%</p> |
| SDAPCD Rule 67.20.1 – Motor Vehicle and Mobile Equipment Coating Operations (Amended 6/30/10) | <p>This rule is applicable to:</p> <ul style="list-style-type: none"> (i) All motor vehicle and mobile equipment coating operations including finishing or refinishing of motor vehicles, mobile equipment, non-motorized models, and their associated parts and components (ii) All cleaning operations associated with motor vehicle and mobile equipment coating operations (iii) Any person who supplies, sells, offers for sale, manufactures, or distributes any automotive coating or associated cleaning material for use within San Diego County | <p>The rule contains various VOC content limits that apply to different types of automotive refinishing coatings based on use and purpose</p> <p>The VOC content limits can be achieved using the following control technologies: waterborne formulation and utilization of exempt compounds</p> <p>Rule provides an alternative compliance option allowing for the use of an approved emission control system, which achieves an overall control efficiency of at least 85% by weight</p> |
| BAAQMD Rule 8-45 – Motor Vehicle and Mobile Equipment Coating | The purpose of this rule is to limit the emission of volatile organic compounds from the | The rule contains various VOC content limits that apply to different types of automotive |

| Rule | Applicability | Control Measure |
|--|--|--|
| Operations (Amended 12/3/08) | finishing or refinishing of motor vehicles, mobile equipment and their parts and components | <p>refinishing coatings based on use and purpose</p> <p>The VOC content limits can be achieved using the following control technologies: waterborne formulation and utilization of exempt compounds</p> |
| SJVAPCD Rule 4612 – Motor Vehicle and Mobile Equipment Coating Operations (Amended 10/21/10) | This rule is applicable to any person who supplies, sells, offers for sale, manufacturers, or distributes any automotive coating for use within the jurisdiction, as well as any person who uses, applies, or solicits the use or application of any automotive coating within the jurisdiction | <p>The rule contains various VOC content limits that apply to different types of automotive refinishing coatings based on use and purpose</p> <p>The VOC content limits can be achieved using the following control technologies: waterborne formulation and utilization of exempt compounds</p> |
| SMAQMD Rule 459 – Automotive, Mobile Equipment, and Associated Parts and Components Coating Operations (Amended 8/25/11) | The provisions of this rule shall apply to any person who supplies, sells, offers for sale, manufactures, or distributes any automotive coating or associated solvent for use within the jurisdiction, as well as any person who uses, applies, or solicits the use or application of any automotive coating or associated solvent within the jurisdiction. The provisions of Rule 441, Organic Solvents, shall not apply to persons using automotive coatings and solvents subject to this rule | <p>The rule contains various VOC content limits that apply to different types of automotive refinishing coatings based on use and purpose</p> <p>The VOC content limits can be achieved using the following control technologies: waterborne formulation and utilization of exempt compounds</p> <p>Rule provides an alternative compliance option allowing for the use of an approved emission control system, which achieves an overall control efficiency of at least 85%</p> |
| CARB 2005 Suggested Control Measures for Automotive Refinishing Coatings | The provisions of the measure apply to facilities conducting automotive refinishing activities | Suggested control measure contains various suggested VOC content limits that apply to different types of automotive refinishing coatings based on use and |

| Rule | Applicability | Control Measure |
|------|---------------|---|
| | | purpose The VOC content limits can be achieved using the following control technologies: waterborne formulation and utilization of exempt compounds |

TABLE 4-37
VOC CONTENT LIMITS (G/L) – LESS WATER AND EXEMPT COMPOUNDS

| Coating Category | South Coast AQMD Rule 1151 – Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations [^] (Amended 11/1/24) | SBCAPCD Rule 339 – Motor Vehicle and Mobile Equipment Coating Operations (Amended 6/19/08) | SDAPCD Rule 67.20.1 - Motor Vehicle and Mobile Equipment Coating Operations (Amended 6/30/10) | BAAQMD Rule 8-45 – Motor Vehicle and Mobile Equipment Coating Operations (Amended 12/3/08) | SJVAPCD Rule 4612 – Motor Vehicle and Mobile Equipment Coating Operations (Amended 10/21/10) | SMAQMD Rule 459 – Automotive, Mobile Equipment, and Associated Parts and Components Coating Operations (Amended 8/25/11) | CARB 2005 Suggested Control Measures for Automotive Refinishing Coatings |
|--------------------------|---|--|---|--|--|--|--|
| Base Coatings | | | | | | | |
| Color Coating | 420 (250) | 420 | 420 | 420 | 420 | 420 | 420 |
| Tinted Mid-Coat | 750 (250) | | | | | | |
| Clear Coatings | N/A | 250 | 250 | 250 | 250 | 250 | 250 |
| Gloss Clear Coating | 520 (250) | N/A | N/A | N/A | N/A | N/A | N/A |
| Matte Clear Coating | 550 | N/A | N/A | N/A | N/A | N/A | N/A |
| Multi-Color Coating | N/A | 680 | 680 | 680 | 680 | 520 or 680* | 680 |
| Primers and Sealers | | | | | | | |
| Pretreatment Wash Primer | 780 (660) | 660 | 660 | 660 | 660 | 660 | 660 |
| Epoxy Primer | 580 (340) | N/A | N/A | N/A | N/A | N/A | N/A |
| Primer Sealer | 550 (250) | 250 | 250 | 250 | 250 | 250 | N/A |
| Primer Surfacer | 580 (250) | N/A | N/A | N/A | N/A | N/A | N/A |
| Other Coating Categories | | | | | | | |
| Adhesion Promoter | 840 (720) | 540 | 540 | 540 | 540 | 540 | 540 |
| Single-Stage Coating | 600 (340) | 340 | 340 | 340 | 340 | 340 | 340 |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Coating Category | South Coast AQMD Rule 1151 – Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations [^] (Amended 11/1/24) | SBCAPCD Rule 339 – Motor Vehicle and Mobile Equipment Coating Operations (Amended 6/19/08) | SDAPCD Rule 67.20.1 - Motor Vehicle and Mobile Equipment Coating Operations (Amended 6/30/10) | BAAQMD Rule 8-45 – Motor Vehicle and Mobile Equipment Coating Operations (Amended 12/3/08) | SJVAPCD Rule 4612 – Motor Vehicle and Mobile Equipment Coating Operations (Amended 10/21/10) | SMAQMD Rule 459 – Automotive, Mobile Equipment, and Associated Parts and Components Coating Operations (Amended 8/25/11) | CARB 2005 Suggested Control Measures for Automotive Refinishing Coatings |
|--|---|--|---|--|--|--|--|
| Temporary Protective Coating | 60 | 60 | 60 | 60 | 60 | 60 | 60 |
| Truck Bed Liner Coating | 310 | 310 | 310 | 310 | 310 | 310 | 310 |
| Underbody Coating | 430 | 430 | 430 | 430 | 430 | 430 | 430 |
| Uniform Finishing Coating | 540 | 540 | 540 | 540 | 540 | 540 | 540 |
| Pigmented Coating for Military Tactical Support Vehicles and Equipment | N/A | N/A | 420 | N/A | N/A | N/A | N/A |
| Primer for Military Tactical Support Vehicles and Equipment | N/A | N/A | 420 | N/A | N/A | N/A | N/A |
| Any Other Coating Type | 250 | 250 | 250 | 250 | 250 | 250 | 250 |

* Mobile equipment driven or drawn on rails and its associated parts and components (520 g/L); Any other mobile equipment or motor vehicle and its associated parts and components (680 g/L).

[^] Phase I VOC limits are shown with the Phase II limits in parentheses which have varying effective dates.

Staff compared the provisions of South Coast AQMD Rule 1151 with control measures implemented in other jurisdictions in the tables above. South Coast AQMD’s Rule 1151 was recently amended on November 1, 2024 to phase out the use of pCBtF and t-BAc in automotive coatings and solvents due to their carcinogenic properties. A temporary Phase I period of three to five years, depending on coating category, was established to allow the sale and use of coatings formulated to meet U.S. EPA National Rule limits. These coatings do not contain pCBtF or t-Bac. Starting in Phase II, between 2028 and 2030, facilities will switch to newly reformulated, low-VOC coatings that do not contain pCBtF or t-BAc.

Rule 1151 partially implements the 2022 AQMP Control Measure CTS-01, which aims to reduce emissions from coatings, solvents, adhesives, and lubricants. Although Rule 1151 is anticipated to temporarily increase VOC emissions by 4.8 tpd, the public health benefits from removing pCBtF and t-BAc far outweigh any short-term emission increases. Upon full implementation, the Phase II limits will result in an overall decrease of 0.19 tpd of VOC emissions. The tiered approach balances immediate health concerns with the feasibility of industry adaptation, further reducing toxic emissions and improving air quality.

Compared to other air districts’ rules, the few differences include the coating categories “Pigmented Coating for Military Tactical Support Vehicles and Equipment” and “Primer for Military Tactical Support Vehicles and Equipment” being included in SDAPCD’s Rule 67-20-1, and some refined coating categories in Rule 1151 including the coating categories “Gloss Clear Coating,” “Matte Clear Coating,” “Epoxy Primer,” and “Primer Surfacer” while other agencies’ rules do not have applicable VOC limits for these categories. The coating category “Multi-Color Coating” was removed from Rule 1151 because it was not reported in the manufacturer’s survey, and no coatings could be identified that meet its definition. Overall, the Phase II VOC limits in South Coast AQMD Rule 1151 are as stringent as, and some cases more stringent than, the limits in other districts’ rules. In addition, Rule 1151 implements the 2022 AQMP Control Measure CTS-01 and the emission reductions were relied upon in the attainment demonstration. Therefore, no contingency measures are proposed.

ix. Marine and Pleasure Craft Coatings

South Coast AQMD Rule 1106 applies to this source category. Staff reviewed control measures for this source category implemented by other local air agencies, including SJVAPCD Rule 4603 and VCAPCD Rule 74.24.1. Table 4-38 summarizes the comparative analysis.

**TABLE 4-38
SOUTH COAST AQMD RULE 1106 COMPARATIVE ANALYSIS**

| Rule Element | South Coast AQMD Rule 1106 – Marine and Pleasure Craft Coatings (Amended 1/6/23) | SJVAPCD Rule 4603 – Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts (Amended 9/17/09) | VCAPCD Rule 74.24.1 – Pleasure Craft Coating and Commercial Boatyard Operations (Amended 11/10/20) |
|---------------|--|--|--|
| Applicability | Any person who supplies, sells, offers for sale, markets, manufactures, blends, | The surface coating of metal parts or products, large appliances parts or products, | Any person who applies, specifies the use of, or supplies coatings for marine |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1106 – Marine and Pleasure Craft Coatings (Amended 1/6/23) | SJVAPCD Rule 4603 – Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts (Amended 9/17/09) | VCAPCD Rule 74.24.1 – Pleasure Craft Coating and Commercial Boatyard Operations (Amended 11/10/20) |
|--------------|---|--|--|
| | <p>packages, repackages, possesses or distributes any Marine or Pleasure Craft Coating and any associated solvent for use within the SCAQMD, as well as any person who applies, stores at a worksite, or solicits the application of any Marine or Pleasure Craft Coating and any associated solvent within the SCAQMD</p> | <p>metal furniture, and plastic parts and products, automotive/transportation and business machine plastic parts and products, and pleasure crafts, and to the organic solvent cleaning, and the storage and disposal of all solvents and waste solvent materials</p> | <p>and fresh water vessels, drilling vessels, and navigational aids, and their parts or components, including any parts subjected to unprotected shipboard conditions</p> |
| Exemptions | <ul style="list-style-type: none"> • Marine or pleasure craft coatings with VOC content ≤ 50 g/L (less water and exempt compounds) as applied • Marine coatings applied to interior surfaces of potable water containers • Touch-up coatings • Any aerosol coating products • Application equipment transfer efficiency requirements for coatings with viscosity of 650 centipoise or greater, as applied • Coating limit requirements for marine coatings for vessels that are intended to submerge to at least 500 feet below the surface water level with a total usage of ≤ 12 gal/year | <ul style="list-style-type: none"> • The requirements of this rule shall not apply to the application of coatings to aircraft, aerospace vehicles, marine vessels, can, coils, and magnetic wire • For pleasure craft coating operations, the application method requirements shall not apply to extreme gloss coating provided the operator complies with the extreme gloss coating VOC limit and the work practice standards in this rule. • Stripping of cured coatings, cured adhesives, and cured inks, except the stripping of such materials from spray application equipment • An operator of pleasure craft coating operations whose VOC emissions from coating operations, | <ul style="list-style-type: none"> • Aerosol coating products subject to California Code of Regulations, Title 17, Article 3, Aerosol Coating Products • Coating application transfer efficiency requirements for application of any topcoat above the vessel water line • Prohibition sales requirements to any supplier or seller of any pleasure craft coating that is shipped outside of the District for use outside the District • Prohibition sales requirements to any manufacturer of any pleasure craft coatings if the manufacturer has provided an accurate compliance statement and if: <ol style="list-style-type: none"> 1) The pleasure craft coating was not sold |

| Rule Element | South Coast AQMD Rule 1106 – Marine and Pleasure Craft Coatings (Amended 1/6/23) | SJVAPCD Rule 4603 – Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts (Amended 9/17/09) | VCAPCD Rule 74.24.1 – Pleasure Craft Coating and Commercial Boatyard Operations (Amended 11/10/20) |
|---|---|---|---|
| | | including related cleaning activities <2.7 tons VOC per 12-month rolling period are not subject to the VOC limits of this rule provided records are maintained | directly to a user or a sales outlet located in the District; or 2) The pleasure craft coating was sold to an independent distributor that is not a subsidiary of, or under the direct control of the manufacturer • Surface preparation requirements to the surface preparation of fiberglass substrates |
| Application Equipment Requirements | Only apply coatings using the following methods: • Electrostatic application; • HVLP spray; • Brush, Dip, Roller; or • Spray application equivalent to HVLP spray; or • Other application method with demonstrated transfer efficiency ≥ HVLP spray with prior APCO written approval | Only apply coatings using the following methods: • Electrostatic application; • Electrodeposition; • HVLP spray; • Flow, Roll, Dip, Brush, Continuous coating; or • Other application method with demonstrated transfer efficiency ≥65% with prior APCO written approval | Only apply coatings using one of following methods properly: • Hand application methods; • HVLP spray; or • Any other application method which has been demonstrated to be capable of achieving a transfer efficiency of at least that of an HVLP application or an alternative method that is capable of achieving a transfer efficiency equal to or better than HVLP spray |
| Solvent Cleaning VOC Content Limits | 25 grams/liter 0.21 pounds/gallon (material VOC content) | 25 grams/liter 0.21 pounds/gallon (material VOC content) | • 200 grams/liter (1.7 pounds/gallon) ROC for surface preparation • No person shall use methylene chloride as a cleanup solvent |
| Solvent Storage and Disposal Requirements | All VOC-containing solvents used in solvent cleaning operations shall be stored in non-absorbent, non-leaking containers, which shall remain | Store or dispose of fresh or spent solvents, waste solvent cleaning materials, coatings, adhesives, catalysts, and thinners in closed, non- | All ROC containing materials shall be stored in nonabsorbent, non-leaking containers, which shall be |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1106 – Marine and Pleasure Craft Coatings (Amended 1/6/23) | SJVAPCD Rule 4603 – Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts (Amended 9/17/09) | VCAPCD Rule 74.24.1 – Pleasure Craft Coating and Commercial Boatyard Operations (Amended 11/10/20) | |
|---|--|--|--|--|
| | closed at all times except when filling or emptying. It is recommended that cloth or paper moistened with VOC-containing solvents be stored in closed, non-absorbent, non-leaking containers | absorbent and non-leaking containers. Containers shall remain closed except when depositing or removing the contents of the containers | closed except when adding or removing materials | |
| VOC Content | Coating Type | Rule 1106 | SJVAPCD Rule 4603 | VCAPCD Rule 74.24.1 |
| Limits for Pleasure Craft Coating Operations in grams/liter Less Water and Exempt Organic Compounds | Extreme High Gloss Topcoat | 490 | 490 | 490 |
| | High Gloss Topcoat | 420 | 420 | 420 |
| | Pretreatment Wash Primer | 780 | 780 | 780 |
| | Finish Primer Surfacer | 420 | 420 | 420 |
| | High Build Primer Surfacer | 340 | 340 | 340 |
| | Aluminum Substrate Antifoulant Coating | 560 | 560 | 560 |
| | Other Substrate Antifoulant Coating | 330 | 330 | Commercial – 400 Pleasure Craft – 330 |
| | All other pleasure craft surface coatings for metal or plastic | 420 | 420 | 420 |
| | Sealers | 550 | --- | 550 |
| | Varnishes | 490 | --- | 490 |
| | Teak Primer | 775 | --- | --- |
| | Low-Solids | 120 | --- | 120 |

Rule 1106 contains unique exemptions that do not align with those in other districts’ rules. For example, coatings with a VOC content of 50 g/L or less, coatings with high viscosity, and submarine coatings are exempt from certain Rule 1106 requirements. The first exemption was introduced to incentivize users to choose lower VOC coatings and manufacturers to formulate lower VOC products. Meanwhile, highly viscous coatings are not amenable to application using spray equipment due to poor flow characteristics. Without the exemption, shops using HVLP equipment would have to thin high solids coatings with VOC solvents to allow them to be sprayed, thus eliminating the benefit of the low-VOC high solids coatings. Finally, the submarine exemption was introduced because the Department of Defense requires the use of coatings that comply with military specifications. While these coatings exceed the VOC content limits in

Rule 1106, their usage is limited to no more than 12 gallons per calendar year of all products combined. The exemptions are reasonable and do not make Rule 1106 less stringent than other district's rules.

South Coast AQMD Rule 1106 contains VOC content limits that are as stringent as those in other districts' rules and staff did not identify any other provisions that would be suitable for a contingency measure.

x. Metal Container, Closure, and Coil Coating Operations

South Coast AQMD Rule 1125 applies to this source category. Staff reviewed control measures for this source category implemented by South Coast AQMD and other local air agencies, including SJVAPCD Rule 4604, SMAQMD Rule 452, and BAAQMD Rule 8-11. Table 4-39 summarizes the control measures staff considered for this source category comparative analysis.

South Coast AQMD Rule 1125 varies in stringency relative to other districts' rules. Other districts' rules have a lower limit for three-piece can interior body sprays (360 g/L vs. 510 g/L) and two-piece can interior body sprays (420 g/L vs. 440 g/L). In addition, while South Coast AQMD and SJVAPCD exempt facilities using small quantities of certain coatings, BAAQMD and SMAQMD do not allow any exemptions. Finally, the minimum required air pollution control device efficiency is slightly less than that required by other districts' rules (85.5 percent vs. 90 percent). However, at the time of rule amendment in 2008, all facilities using add-on control technology to achieve compliance were operating at overall efficiencies at or above 90 percent.⁴⁹

Meanwhile, Rule 1125 is potentially more stringent compared to other districts' rules due to the inclusion of VOC content limits for necker lubricants and inkjet inks, which are not covered by other districts' rules. In addition, the VOC content limits in Rule 1125 for end sealing compounds are more stringent than those in SJVAPCD Rule 4604.

The 2016 and 2022 AQMPs included Potential Control Measures 14 and RACM 7, respectively, to assess the feasibility of adopting more stringent VOC content limits similar to those in other districts' rules. Both AQMPs concluded that implementing these stricter limits would not be cost-effective, as costs exceeded \$200,000 per ton of VOC reduced for the four facilities currently subject to Rule 1125. Additionally, the anticipated emission reductions—about 0.13 tons per year—would have an inconsequential impact on air quality. In the future, however, Rule 1125 is expected to undergo an amendment process to prohibit the use of pCBtF and t-BaC in applicable coatings. As part of the rulemaking, staff will undertake a comprehensive BARCT analysis to consider more stringent VOC content limits. The phase out of pCBtF and t-BaC and lowering VOC limits will be implemented as soon as feasible following the adoption of the rule, therefore, no contingency measures are proposed for this category.

⁴⁹ South Coast AQMD, Final Staff Report for Proposed Amended Rule 1125, p. 11.
<http://www3.aqmd.gov/hb/2008/March/080336a.html>

**TABLE 4-39
SOUTH COAST AQMD RULE 1125 COMPARATIVE ANALYSIS**

| Rule Element | South Coast AQMD Rule 1125 – Metal Container, Closure, and Coil Coating Operations (Amended 3/7/08) | SJVAPCD Rule 4604 – Can and Coil Coating Operations (Amended 9/20/07) | SMAQMD Rule 452 – Can Coating (Amended 9/25/08) | BAAQMD Rule 8-11 – Metal Container, Closure and Coil Coating (Amended 11/19/97) |
|---------------|--|---|--|--|
| Applicability | Applies to all coating operations in the manufacturing and/or reconditioning of metal cans, drums, pails, lids, and closures. It also includes coating of the surface of flat metal sheets, strips, rolls, or coils during the manufacturing and/or reconditioning of metal containers, closures, and coils | Applies to can and coil coating operations, and from organic solvent cleaning, storage and disposal associated with can coating and coil coating operations | The provisions of this rule shall apply to can coating operations | Applies to the coating of metal coils, cans, drums, pails, lids and crowns |
| Requirements | <ul style="list-style-type: none"> • Facilities may either comply with the VOC content limits or employ an emission control system with a 90% collection efficiency and a 95% destruction efficiency • All solvent cleaning operations must conform to the requirements of Rule 1171 | <ul style="list-style-type: none"> • Facilities have the option to either meet the VOC content limits directly or use an emission control system that achieves at least 90% control efficiency, or alternatively, reduces VOC emissions by an amount equal to what would be attained by adhering to the limits | <ul style="list-style-type: none"> • Facilities have the option to either meet the VOC content limits directly or use an emission control system that achieves at least 90% control efficiency and does not emit emissions greater than those that would be achieved from the use of compliant coatings | <ul style="list-style-type: none"> • Facilities have the option to either meet the VOC content limits directly or use air pollution abatement equipment with an abatement device efficiency of at least 90% |

| Rule Element | South Coast AQMD Rule 1125 – Metal Container, Closure, and Coil Coating Operations (Amended 3/7/08) | SJVAPCD Rule 4604 – Can and Coil Coating Operations (Amended 9/20/07) | SMAQMD Rule 452 – Can Coating (Amended 9/25/08) | BAAQMD Rule 8-11 – Metal Container, Closure and Coil Coating (Amended 11/19/97) |
|---------------------|---|---|--|---|
| Coating Application | <p>Coating must be applied with properly operating equipment using one of the following methods:</p> <ul style="list-style-type: none"> • Electrostatic • Flow coat • Roll coat • Dip coat • HVLP spray • Hand application • Printing • Other methods demonstrated to achieve an equivalent transfer efficiency | <p>Coating must be applied with properly operating equipment using one of the following methods:</p> <ul style="list-style-type: none"> • Electrostatic • Flow coat • Roll coat • Dip coat • HVLP spray • Hand application • Other methods demonstrated to achieve a $\geq 65\%$ transfer efficiency • Employing an emission control system that achieves a capture and control efficiency of $\geq 90\%$ | <p>Coating must be applied with properly operating equipment using one of the following methods:</p> <ul style="list-style-type: none"> • Electrostatic • Flow coat • Roll coat • Dip coat • HVLP spray • LVLP spray • Hand application • Other methods demonstrated to achieve an equivalent transfer efficiency • Employing an emission control system that achieves a capture and control efficiency of $\geq 85.5\%$ | No requirements |
| Exemptions | <ul style="list-style-type: none"> • Spray coating of 1 gallon per day or less per facility • Aerosol coating products | <ul style="list-style-type: none"> • Facilities using 55 gallons or less of aggregate coatings and cleaning solvents per rolling 12-month period. | None | None |

| Rule Element | South Coast AQMD Rule 1125 – Metal Container, Closure, and Coil Coating Operations (Amended 3/7/08) | SJVAPCD Rule 4604 – Can and Coil Coating Operations (Amended 9/20/07) | SMAQMD Rule 452 – Can Coating (Amended 9/25/08) | BAAQMD Rule 8-11 – Metal Container, Closure and Coil Coating (Amended 11/19/97) | |
|--|---|--|---|---|-------------------------|
| | | <ul style="list-style-type: none"> • Lubricants applied by spray mister to the can end seal compound application nozzle and the lubricants applied to the can body during the can body forming process. • Stripping of cured coatings, cured adhesives, and cured inks, except the stripping of such materials from spray application equipment. • Cleaning solvent VOC limits shall not apply to the cleaning in laboratory tests and analyses | | | |
| VOC Content Limits for Can Coatings in grams/liter Less Water and Exempt Organic Compounds | Coating Type | Rule 1125 | SJVAPCD Rule 4604 | SMAQMD Rule 452 | BAAQMD Rule 8-11 |
| | Three-Piece Can Sheet Basecoat (Exterior and Interior Overvarnish) | 225 | 225 | 225 | 225 |
| | Two-Piece Can Exterior Basecoat and Overvarnish | 250 | 250 | 250 | 250 |

| Rule Element | South Coast AQMD Rule 1125 – Metal Container, Closure, and Coil Coating Operations (Amended 3/7/08) | SJVAPCD Rule 4604 – Can and Coil Coating Operations (Amended 9/20/07) | SMAQMD Rule 452 – Can Coating (Amended 9/25/08) | BAAQMD Rule 8-11 – Metal Container, Closure and Coil Coating (Amended 11/19/97) | |
|---|---|---|---|---|-------------------------|
| | Can Interior Body Spray (Two-Piece) | 440 | 420 | 420 | 420 |
| | Can Interior Body Spray (Three-Piece) | 510 | 360 | 360 | 360 |
| | Three-Piece Can Side Seam Spray | 660 | 660 | 660 | 660 |
| VOC Content Limits for Drums, Pails, and Lids Coatings in grams/liter Less Water and Exempt Organic Compounds | Coating Type | Rule 1125 | SJVAPCD Rule 4604 | SMAQMD Rule 452 | BAAQMD Rule 8-11 |
| | New (Exterior) | 340 | 340 | --- | 340 |
| | New (Interior) | 420 | 420 | --- | 420 |
| | Reconditioned (Exterior) | 420 | 420 | --- | 420 |
| | Reconditioned (Interior) | 510 | 510 | --- | 510 |
| VOC Content Limits for Coil Coatings in grams/liter Less Water and Exempt Organic Compounds | Coating Type | Rule 1125 | SJVAPCD Rule 4604 | SMAQMD Rule 452 | BAAQMD Rule 8-11 |
| | All Coatings | 200 | 200 | --- | 200 |
| VOC Content Limits for All Operations in grams/liter Less Water and Exempt | Coating Type | Rule 1125 | SJVAPCD Rule 4604 | SMAQMD Rule 452 | BAAQMD Rule 8-11 |
| | Necker Lubricants | 100 | --- | --- | --- |
| | End Sealing Compounds - Food/Beverage Cans | 20 | 60 | 20 | 20 |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1125 – Metal Container, Closure, and Coil Coating Operations (Amended 3/7/08) | SJVAPCD Rule 4604 – Can and Coil Coating Operations (Amended 9/20/07) | SMAQMD Rule 452 – Can Coating (Amended 9/25/08) | BAAQMD Rule 8-11 – Metal Container, Closure and Coil Coating (Amended 11/19/97) | |
|-------------------|---|---|---|---|-----|
| Organic Compounds | End Sealing Compounds - Non-Food Containers | 0 | 60 | 0 | 20 |
| | Inks - Other than Inkjet | 300 | --- | --- | 300 |
| | Inks – Inkjet* | 250 | --- | --- | --- |
| | Inks - Thermo-chromic Inkjet* | 700 | --- | --- | --- |
| | Inkjet Make-Up Solvents – General* | 250 | --- | --- | --- |
| | Inkjet Make-Up Solvents – Thermo-chromic* | 800 | --- | --- | --- |

*Referenced VOC limits expressed as grams of VOC per liter of material.

xi. Magnet Wire Coatings

South Coast AQMD Rule 1126 applies to this source category. Staff reviewed control measures for this source category implemented under BAAQMD Rule 8-26.

Table 4-40 summarizes the control measures staff considered for this source category comparative analysis. South Coast AQMD Rule 1126 has the most stringent requirements and, therefore, no contingency measures are proposed.

**TABLE 4-40
SOUTH COAST AQMD RULE 1126 COMPARATIVE ANALYSIS**

| Rule Element | South Coast AQMD Rule 1126 – Magnet Wire Coating Operations (Amended 1/13/95) | BAAQMD Rule 8-26 – Magnet Wire Coating Operations (Amended 12/20/95) |
|---|--|---|
| Applicability | Applies to all coating operations on magnet wire, where the wire is continuously drawn through a coating applicator | Applies to all coating operations on magnet wire |
| Requirements | Comply with the specified VOC emission limit or by installing an approved emission control device with a control efficiency of at least 90% | Comply with the specified VOC emission limit or by installing an approved emission control device with a control efficiency of at least 90% |
| Emission Limit for magnet wire coatings in grams/liter, less water and exempt compounds | 200 | 200 |
| Exemptions | <ul style="list-style-type: none"> • Operations which emit less than 1 kg per hour, and not more than 5 kg per day of VOC • Aerosol coating products | <ul style="list-style-type: none"> • Operations which emit less than 1 kg per hour, and not more than 6.8 kg per day of VOC • Coating of electrical machinery and equipment subassemblies |

xii. High-Emitting Spray Booths

South Coast AQMD Rule 1132 applies to high-emitting spray booth facilities comprised of aerospace, metal, plastic and wood products coatings, and open molding composite manufacturing operations. Facilities subject to Rule 1132 are also subject to other source-specific South Coast AQMD rules, including Rules 1107, 1115, 1124, 1128, 1136, 1145, 1162, and 1171. Rule 1162 is evaluated under Industrial Processes while the other rules are evaluated separately under their respective coating categories.

Rule 1132 requirements were previously summarized in Table 4-22 at the beginning of the Cleaning and Surface Coatings evaluation section and staff did not identify comparable rules in other air districts. Therefore, Rule 1132 is not further evaluated.

c. Conclusion

Staff reviewed the available control measures for the major source category 230 – Coatings and Related Process Solvents category and found that the available measures are already being implemented. Furthermore, South Coast AQMD rules are just as stringent as other large regulatory bodies. In addition, as coating manufacturers would require a minimum of a few years to reformulate coatings, there are no feasible short-term contingency measures that can be taken regarding the VOC content limits in applicable rules. Consequently, no contingency measures are proposed.

4. Printing

a. Overview

Major source category 240 – Printing includes thinning and cleanup solvents, rotogravure, flexographic, lithographic, letter press, screen printing, and other printing related sources. As summarized in Table 4-41, this source category accounts for 0.89 tpd of VOC and zero NOx emissions in 2037.

**TABLE 4-41
PRINTING EMISSIONS BASED ON 2037 SUMMER PLANNING INVENTORY**

| Source Category | VOC (tpd) | NOx (tpd) |
|---|-------------|-------------|
| 240 – Thinning and Cleanup Solvent Uses | 0.20 | 0.00 |
| 260 – Rotogravure | 0.00 | 0.00 |
| 262 – Flexographic | 0.04 | 0.00 |
| 264 – Lithographic | 0.49 | 0.00 |
| 266 – Letter Press | 0.00 | 0.00 |
| 268 – Screen Printing | 0.02 | 0.00 |
| 995 – Other | 0.15 | 0.00 |
| Total | 0.89 | 0.00 |

b. Evaluation

South Coast AQMD Rules 442, 1128, 1130, and 1130.1 apply to this source category. Because Rule 442 was discussed in Table 4-25 for the degreasing source category, it is excluded in this section, and the remaining rules are compared with the applicable rules in other air districts.

Staff compared South Coast AQMD rules and other air districts’ rules in Table 4-42. The review of the different control measures indicated that South Coast AQMD’s requirements are similar to other air districts. One of those requirements is the utilization of an emission control device with a control efficiency of at least 90 percent. Furthermore, the implementation of similar best management practices and good housekeeping to minimize emissions is required, e.g., prohibiting the use of spray coating unless a high transfer efficiency method is used. In addition, South Coast AQMD sets a VOC content limit for coatings of 265 g/L, which aligns with that in other air districts, as well as an overall emission control efficiency of 90 percent. This VOC limit is more stringent than the limit recommended by U.S. EPA’s CTG. Staff did not

identify control measures for further consideration as contingency measures in the South Coast AQMD jurisdiction.

c. Conclusion

South Coast AQMD rules for printing generally contain the most stringent requirements compared to similar rules from other districts. In addition, reformulating to lower VOC-content materials would take more than two years. Therefore, staff did not identify any potential contingency measures for printing.

**TABLE 4-42
COMPARISON OF SOUTH COAST AQMD RULES AND OTHER AIR DISTRICTS' RULES FOR PRINTING**

| TABLE 4-42.1 – Paper, Fabric, and Film Coating Operations | | | | | | |
|---|--|---|--|--|--|--|
| Rule Element | South Coast AQMD Rule 1128 – Paper, Fabric, and Film Coating Operations (Amended 3/8/96) | SJVAPCD Rule 4607 – Graphic Arts and Paper, Film, Foil and Fabric Coatings (Amended 12/18/08) | BAAQMD Rule 8-12 – Paper, Fabric and Film Coating (Amended 12/20/95) | U.S. EPA – CTG for Paper, Film, and Foil Coatings (Amended 9/2009) | SDAPCD Rule 67.5 – Paper, Film and Fabric Coating Operations (Amended 5/15/96) | VCAPCD Rule 74.3 – Paper, Fabric and Film Coating Operation (Amended 12/10/91) |
| Applicability | Coatings or wash primers to paper, fabric, or film substrates | Graphic arts printing operations, digital printing operations, and paper, film, foil or fabric coating operations | Application of coatings and adhesives to paper, fabric or films | This CTG provides control recommendations for reducing VOC emissions stemming from the use of coatings in paper, film, and foil surface coating operations | Applies to any paper, fabric, and/or film coating application process | Coating of paper, fabric or film |
| Key Exemptions | Coating facility that applies <2 gal/day Application of materials with <20 g/L | None applicable | Coating line that emits <14.3 lb/day | | | |

| Rule Element | South Coast AQMD Rule 1128 – Paper, Fabric, and Film Coating Operations (Amended 3/8/96) | SJVAPCD Rule 4607 – Graphic Arts and Paper, Film, Foil and Fabric Coatings (Amended 12/18/08) | BAAQMD Rule 8-12 – Paper, Fabric and Film Coating (Amended 12/20/95) | U.S. EPA – CTG for Paper, Film, and Foil Coatings (Amended 9/2009) | SDAPCD Rule 67.5 – Paper, Film and Fabric Coating Operations (Amended 05/15/96) | VCAPCD Rule 74.3 – Paper, Fabric and Film Coating Operation (Amended 12/10/91) |
|------------------|--|---|---|--|--|--|
| Key Requirements | <p>Coating VOC content:</p> <ul style="list-style-type: none"> <265 g/L of coating, with or without heating ovens and a minimum transfer efficiency of 95%; or VOC emissions are reduced to <120 g/L of coating applied <p>Plastisol VOC content:</p> <ul style="list-style-type: none"> <20 g/L of coating <p>Wash primer VOC content:</p> <ul style="list-style-type: none"> <265 g/L of material used; or VOC emissions are collected and reduced by an approved emission control system <p>Cleaning of application equipment:</p> | <p>Coating VOC content:</p> <ul style="list-style-type: none"> <265 g/L of coating <p>Plastisol VOC content:</p> <ul style="list-style-type: none"> <20 g/L of coating <p>Wash primer VOC content:</p> <ul style="list-style-type: none"> <265 g/L of material used <p>Emission control system:</p> <ul style="list-style-type: none"> 90%, overall capture and control efficiency | <p>Coating or adhesive VOC content:</p> <ul style="list-style-type: none"> <265 g/L of coating VOC emissions are reduced to <120 g/L of coating applied | <ul style="list-style-type: none"> Recommends a limit of 350 g/L VOC control efficiency of 90% overall control | <ul style="list-style-type: none"> Coating-specific VOC content limits of 265 g/L, or Use control system with a combined collection efficiency of 90% Coating must display the content of methyl chloride | <p>Coating VOC content:</p> <ul style="list-style-type: none"> <265 g/L of coating <p>VOC emissions from application process are <120 g/L of coating applied</p> <p>Combined capture and destruction efficiency of no less than 90%</p> <p>Clean-up solvent VOC content:</p> <ul style="list-style-type: none"> <200 g/L <p>All VOC-containing solvents must be stored in non-absorbent, non-leaking containers</p> |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1128 – Paper, Fabric, and Film Coating Operations (Amended 3/8/96) | SJVAPCD Rule 4607 – Graphic Arts and Paper, Film, Foil and Fabric Coatings (Amended 12/18/08) | BAAQMD Rule 8-12 – Paper, Fabric and Film Coating (Amended 12/20/95) | U.S. EPA – CTG for Paper, Film, and Foil Coatings (Amended 9/2009) | SDAPCD Rule 67.5 – Paper, Film and Fabric Coating Operations (Amended 05/15/96) | VCAPCD Rule 74.3 – Paper, Fabric and Film Coating Operation (Amended 12/10/91) |
|--------------|--|---|--|--|---|--|
| | <ul style="list-style-type: none"> • 85% of VOC are collected and disposed; or • Clean-up materials contain ≤15% VOC <p>Approved emission control system:</p> <ul style="list-style-type: none"> • 90% emission collection and 95% emission reduction (85%, overall efficiency); or • 50 ppm outlet concentration <p>All VOC-containing solvents must be stored in non-absorbent, non-leaking containers</p> | | | | | |

| TABLE 4-42.2 – Graphic Arts Operations | | | | | |
|--|--|---|--|--|--|
| Rule Element | South Coast AQMD Rule 1130 – Graphic Arts (Amended 5/2/14) | SJVAPCD Rule 4607 – Graphic Arts and Paper, Film, Foil and Fabric Coatings (Amended 12/18/08) | SMAQMD Rule 450 – Graphic Arts Operations (Amended 10/23/08) | BAAQMD Rule 8-20 – Graphic Arts Printing and Coating Operations (Amended 11/19/08) | VCAPCD Rule 74.19 – Graphic Arts (Amended 6/14/11) |
| Applicability | Any person performing graphic arts operations or who supplies, sells, offers for sale, markets, manufactures, blends, repackages, stores at a worksite, distributes, applies or solicits the application of graphic arts materials for use | Graphic arts printing operations, digital printing operations, and paper, film, foil or fabric coating operations | Graphic arts operations and any screen printing operation at any stationary source regardless of the substrate | Graphic arts operation | Any person who applies, manufactures, or supplies any ink, coating, adhesive, fountain solution, or solvent containing VOC that is as part of a graphic arts operation or sold for use in a graphic arts operation |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1130 – Graphic Arts (Amended 5/2/14) | SJVAPCD Rule 4607 – Graphic Arts and Paper, Film, Foil and Fabric Coatings (Amended 12/18/08) | SMAQMD Rule 450 – Graphic Arts Operations (Amended 10/23/08) | BAAQMD Rule 8-20 – Graphic Arts Printing and Coating Operations (Amended 11/19/08) | VCAPCD Rule 74.19 – Graphic Arts (Amended 6/14/11) |
|--------------|---|---|---|--|---|
| Exemptions | <p>Metallic and matte finish inks:</p> <ul style="list-style-type: none"> • Usage not to exceed 2 gallons on any one day and 125 gal/year at a facility • Potential to emit (PTE) and actual VOC emissions do not exceed 10 tons per calendar year from all VOC sources; and • VOC content of matte finish does not exceed 535 g/L • VOC content of metallic inks does not exceed 460 g/L | | <p>Any graphic arts operation:</p> <ul style="list-style-type: none"> • Actual emissions <60 lb/month from all graphic arts operations and cleaning materials; or • PTE ≤175 lb/month <p>Aerosol adhesives:</p> <ul style="list-style-type: none"> • <600 lb/month <p>Lithographic and letterpress printing, metering rollers and printing plates:</p> <ul style="list-style-type: none"> • ≤100 g/L <p>Fountain solution:</p> <ul style="list-style-type: none"> • Total actual emissions of <450 lb/month from all offset lithographic printing operations <p>Heatset web offset lithographic printing and heatset web letterpress printing:</p> <ul style="list-style-type: none"> • PTE from drying oven, prior to emissions | <p>Low-emitting exemption:</p> <ul style="list-style-type: none"> • <75 lb/month | <p>Any stationary source that emits <200 lb VOC/rolling 12 month</p> |

| Rule Element | South Coast AQMD Rule 1130 – Graphic Arts (Amended 5/2/14) | SJVAPCD Rule 4607 – Graphic Arts and Paper, Film, Foil and Fabric Coatings (Amended 12/18/08) | SMAQMD Rule 450 – Graphic Arts Operations (Amended 10/23/08) | BAAQMD Rule 8-20 – Graphic Arts Printing and Coating Operations (Amended 11/19/08) | VCAPCD Rule 74.19 – Graphic Arts (Amended 6/14/11) | |
|--------------|--|---|---|--|--|-------------------|
| | | | control equipment, <25 tpy Flexible package printing inks, coatings, and adhesives: <ul style="list-style-type: none"> • PTE from drying oven, prior to emissions control equipment, <25 tpy | | | |
| Requirements | VOC Content Limits, g/L | | | | | |
| | Category | South Coast AQMD Rule 1130 | SJVAPCD Rule 4607 | SMAQMD Rule 450 | BAAQMD Rule 8-20 | VCAPCD Rule 74.19 |
| | Graphic art material | | | | | |
| | Adhesive | 150 | 150 | 150 | 150 | 150 |
| | Coating | 300 | 300 | 300 | 300 | 300 |
| | Flexographic fluorescent ink | 300 | 300 | 300 | 300 | 300 |
| | Flexographic, non-porous substrate | 300 | 300 | - | 300 | - |
| | Flexographic, porous substrate | 225 | 225 | - | 225 | 225 |
| | Gravure ink | 225 | - | - | - | - |
| | Letterpress ink | 300 | - | - | - | - |
| | Offset lithographic ink | 300 | - | - | - | - |
| | Fountain solution | - | - | - | 8% by volume | - |
| | Heatset web-fed | | 1.6% by volume | - | - | - |
| | Using alcohol without refrigerated chiller | 16 | - | 1.6% by weight | - | 16 |
| | Using alcohol with refrigerated chiller | 30 | - | 3% by weight | - | 30 |
| | Using alcohol substitute | 50 | - | - | - | 50 |
| | Sheet-fed | | 5.0% by volume | - | - | - |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Requirements | VOC Content Limits, g/L | | | | | |
|--------------|--|----------------------------|-------------------|-----------------|------------------|-------------------|
| | Category | South Coast AQMD Rule 1130 | SJVAPCD Rule 4607 | SMAQMD Rule 450 | BAAQMD Rule 8-20 | VCAPCD Rule 74.19 |
| | Using alcohol with refrigerated chiller | 85 | - | 8.5% by weight | - | 85 |
| | Using alcohol substitute | 50 | - | 5% by weight | - | 50 |
| | Not-heatset web-fed | - | 5.0% by volume | - | - | 50 |
| | Using alcohol without refrigerated chiller | 50 | - | - | - | - |
| | Using alcohol with refrigerated chiller | 50 | - | - | - | - |

| TABLE 4-42.3 – Screen Printing Operations | | | | | | |
|---|--|---|--|--|---|---------------------|
| Rule Element | South Coast AQMD Rule 1130.1 – Screen Printing Operation (Amended 12/13/96) | SJVAPCD Rule 4607 – Graphic Arts and Paper, Film, Foil and Fabric Coatings (Amended 12/18/08) | SMAQMD Rule 450 – Graphic Arts Operations (Amended 10/23/08) | BAAQMD Rule 8-20 – Graphic Arts Printing and Coating Operations (Amended 11/19/08) | VCAPCD Rule 74.19.1 – Screen Printing Operations (Amended 11/11/03) | |
| Applicability | Persons performing screen printing operations or who sell, distribute, or require the use of screen printing materials | See Table 4-42.2 | See Table 4-42.2 | See Table 4-42.2 | Any person who uses or manufactures, specifies the use of, sells, or offers for sale, any ink, coating, adhesive, resist, or solvent containing VOC | |
| Exemptions | A facility or screen printing operations performed by manufacturers for performance research and development (R&D) that emit ≤2 lb VOC/day | See Table 4-42.2 | See Table 4-42.2 | See Table 4-42.2 | Any facility that emits <200 lb VOC/rolling period of 12 months | |
| Requirements | VOC Limits, g/L | | | | | |
| | Category | South Coast AQMD Rule 1130.1 | SJVAPCD Rule 4607 | SMAQMD Rule 450 | BAAQMD Rule 8-20 | VCAPCD Rule 74.19.1 |
| | Product | | | | | |
| | Chlorine indicator | 500 | - | - | - | - |
| | Containers | 800 | - | - | - | - |

| Requirements | VOC Limits, g/L | | | | | |
|--------------|--|---------------------------------|----------------------|--------------------|---------------------|------------------------|
| | Category | South Coast AQMD Rule 1130.1 | SJVAPCD Rule 4607 | SMAQMD Rule 450 | BAAQMD Rule 8-20 | VCAPCD Rule 74.19.1 |
| | Electronic circuit | 850 | - | - | - | - |
| | Mechanically-formed products | 800 | - | 800 | - | - |
| | Overlays | 800 | - | 800 | - | - |
| | Polyethylene products | 800 | - | - | - | - |
| | Sterilization indicator | 600 | - | - | - | - |
| | Water slide decals: | - | - | 800 | - | 800 |
| | Opaque inks | 800 | - | - | - | - |
| | Clear inks | 800 | - | - | - | - |
| | Ceramic decal inks | 800 | - | - | - | 800 |
| | Substrate | | | | | |
| | Ceramic | 800 | - | - | - | - |
| | Fiberglass | 600 | - | - | - | - |
| | Glass or metal | 600 | - | - | - | - |
| | Man-made textile | 800 | - | - | - | - |
| | Unsealed aluminum | 800 | - | - | - | - |
| | Screen Printing Material | | | | | |
| | Adhesive | 400 | 150 | 150 | 150 | 400 |
| | Coating | 400 | 400 | 400 | 400 | 400 |
| | Fine detail loose-leaf binder ink | 745 | - | - | - | - |
| | Fluorescent ink | 540 | - | - | - | - |
| | High-VOC serigraph ink | 800 | - | - | - | - |
| | Loose-leaf binder metallic ink | 745 | - | - | - | - |
| | Metallic ink | 400 | - | 400 | 400 | 400 |
| | Printing ink | 400 | - | - | - | 400 |
| | Resists | 600 | 600 | - | - | 600 |
| | Scratch-off ink | 800 | - | - | - | - |
| | Water-slide decal adhesive | 800 | - | - | - | - |
| | Extreme performance screen printing material | 400 | - | 800 | 400 | 800 |

5. Adhesives and Sealants

a. Overview

Major source category 250 – Adhesives and Sealants includes emissions of VOC-containing organic solvent-based or water-based adhesives and sealant materials. This major source category accounts for 4.62 tpd of VOC and zero NOx emissions in the Basin’s 2037 summer planning inventory.

b. Evaluation

South Coast AQMD Rules 442 and 1168 apply to the major source category 250 – Adhesives and Sealants. Key requirements of Rule 442 were already discussed in Table 4-25 for the degreasing source category, along with the comparable requirements in other air districts’ rules. Therefore, this section only includes analysis of Rule 1168 and applicable air districts’ rules. Rule 1168 was amended in November 2022 to relax the stringency of certain limits due to a technology assessment which demonstrated that previous limits were not feasible.⁵⁰ In addition, the amendment prohibited the use of pCBtF and t-BAC, resulting in some VOC limits being increased to accommodate substitution with less toxic material.

South Coast AQMD Rule 1168 is compared with SJVAPCD Rule 4653, SMAQMD Rule 460, BAAQMD Rule 8-51, and VCAPCD Rule 74.20 in Table 4-43. Comparison of these rules revealed that the VOC limits in South Coast AQMD Rule 1168 are more stringent for most unit categories than those in other air districts. While there are some categories where other air districts’ rules are more stringent, Rule 1168 sets the most stringent limit that is technically feasible and restricts exemptions carefully. For example, SJVAPCD Rule 4653 has a significantly more stringent limit for pressure sensitive adhesive primers (250 g/L vs. 785 g/L). However, at the time of rule amendment, staff did not identify any pressure sensitive adhesive primers compliant with the 250 g/L limit and concluded that the limit is technologically infeasible.

SJVAPCD Rule 4653’s low usage and small container exemptions (20 gal/year adhesives and sealants; and adhesives that are sold or supplied in less than or equal to 8 oz. non-reusable containers) differ from those in South Coast AQMD Rule 1168 (55 gal/year, with some exceptions; and regulated products, which weigh less than or equal to 1 lb, or consist of less than or equal to 16 fluid oz.). For products which weigh less than or equal to 1 lb or consist of less than or equal to 16 fluid oz., they are exempted because they are regulated by CARB’s Consumer Products Regulation⁵¹ and are not subject to Rule 1168. In addition, the low usage exemption in SJVAPCD Rule 4653 applies generally to facilities that use less than 20 gal/year of any type of adhesive or sealant, meaning such facilities do not have to comply with any VOC limits. In contrast, South Coast AQMD allows facilities to use up to 55 gal/year of noncompliant products, but restricts this exemption where there are no compliant products and the facilities solely rely on this

⁵⁰ South Coast AQMD, Final Subsequent Environmental Assessment for Proposed Amended Rule 1168 - Adhesive and Sealant Applications, October 2022. <https://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2022/2022-Nov4-027.pdf?sfvrsn=6>

⁵¹ CCR Title 17 § 94509

exemption (e.g., pressure sensitive and rubber vulcanization products). The low usage exemption also excludes:

- Architectural applications;
- Contact adhesives;
- Special purpose contact adhesives;
- Adhesives used on porous substrates;
- Rubber vulcanization adhesives; and
- Top and trim adhesives.

South Coast AQMD also has the following exemptions, which do not correspond to any equivalent exemptions in SJVAPCD Rule 4653:

1. Regulated products used in the field installation and repair of potable water linings and covers at water treatment, storage, or water distribution facilities.
2. Adhesive tape.
3. Regulated products sold in quantities of less than or equal to 1 fluid oz.
4. Adhesives used to glue flowers to parade floats.
5. Shoe repair, luggage, and handbag adhesives.

While these exemptions may appear to be less stringent than other districts' rules, further analysis revealed this not to be the case. The potable water linings and covers exemption was needed to support a more stringent VOC limit for potable water architectural sealants (100 g/L in Rule 1168 vs. 250 g/L in other districts' rules), as these were the instances where the lower limit could not be achieved. Adhesive tapes were exempted because these products do not have a measurable VOC content and products sold in quantities of less than or equal to 1 fluid oz. are exempted to align with CARB's Consumer Products Regulation.⁵² The "adhesives used to glue flowers to parade floats" are exempted to support the New Year's Rose Parade. No other district has this type of parade and therefore no exemption was granted. Shoe repair, luggage, and handbag adhesives use contact adhesives in quantities less than 20 gallons per year. Other air districts exempt all adhesive use below 20 gallons per year per facility. Since contact adhesives are not included in the 55 gallon exemption for Rule 1168, an exemption for that specific use is included in the rule. Ultimately, these operations are exempted either directly (as in Rule 1168) or the more broadly applicable 20 gallon per year per facility exemption in other air district regulations. Table 4-31 compares South Coast AQMD's Rule 1168 with other districts' rules and demonstrates that South Coast AQMD has more stringent limits in multiple adhesive categories.

c. Conclusion

Staff concluded that there is no appropriate contingency measure for the adhesives and sealants source category. VOC limits in certain categories were identified as technologically infeasible during recent rule amendments. Besides the technological feasibility, it is not feasible to trigger lower VOC limits for adhesives and sealants due to the required implementation timeline of a contingency measure. Consistent

⁵² CCR Title 17 § 94509

with the U.S. EPA's guidance, South Coast AQMD would only have 60 days from the triggering date to issue a compliance advisory to adhesive and sealant manufacturers and distribute lower VOC products within two years. Reformulation to lower VOC content products requires significantly longer lead times than two years. Given the urgency and severity of ozone air quality in the Basin, if such opportunities to reduce VOC emissions existed, they would be adopted as control measures to attain ozone standards and improve air quality, rather than being reserved for contingency.

In some instances, commercially available products already have lower VOC content than is required by regulation and VOC emissions from these products are already reflected in the SIP inventory, which is based on reported sales data. Therefore, there would be no emission reductions associated with these products. In all, staff does not consider lower VOC limits for adhesives and sealants to be a feasible contingency measure.

**TABLE 4-43
COMPARISON OF SOUTH COAST AQMD RULE 1168 AND OTHER AIR DISTRICTS' RULES FOR ADHESIVES AND SEALANTS**

| Rule Element | South Coast AQMD Rule 1168 – Adhesive and Sealant Applications (Amended 11/4/22) | SJVAPCD Rule 4653 – Adhesives and Sealants (Amended 9/16/10) | SMAQMD Rule 460 – Adhesives and Sealants (Amended 11/30/00) | BAAQMD Rule 8-51 – Adhesive and Sealant Products (Amended 7/17/02) | VCAPCD Rule 74.20 – Adhesives and Sealants (Amended 10/9/18) |
|---------------|--|---|---|--|---|
| Applicability | Any person who uses, sells, stores, supplies, distributes, offers for sale, or manufactures for sale any adhesives, adhesive primers, sealants, or sealant primers, unless otherwise specifically exempted by this rule | Any person who supplies, sells, offers for sale, or applies any adhesive product, sealant product, or associated solvent | Any person who manufactures, sells, offers for sale, or supplies an adhesive or sealant product for use in the district, or uses an adhesive or sealant product, or uses a surface preparation solvent, a cleanup solvent, or a stripper, or solicits, requires the use of, or specifies the application of an adhesive or sealant product, surface preparation solvent, cleanup solvent, or stripper that does not comply with this rule | | Any person who supplies, sells, offers for sale, manufactures, solicits the application of, or uses adhesives, sealants, sealant primers or adhesive primers in Ventura County |
| Exemptions | <ul style="list-style-type: none"> • Adhesive tape • Adhesives, adhesive primers, sealants, or sealant primers, and associated application processes • Regulated products shipped, supplied, or sold to persons for use outside the District, or distribution centers that do not ship regulated products | <ul style="list-style-type: none"> • Stationary sources that use ≤20 gallons (gal.) of adhesive products • Adhesive/sealant products containing less than 20 g VOC/L. • Testing and evaluation of adhesives in research laboratories, analytical laboratories, or quality assurance laboratories | <ul style="list-style-type: none"> • Household adhesives regulated by the State of California • Solvent welding operations used in the manufacturing medical devices including catheters, heart valves, blood cardioplegia machines, tracheotomy tubes, blood oxygenators, and cardiatory reservoirs | <ul style="list-style-type: none"> • Aerosol adhesive products • Adhesive or sealant products in the manufacture or repair of aerospace or undersea-based weapons system components • consumer adhesives subject to the CARB consumer products regulation, 17 CCR | <ul style="list-style-type: none"> • Any stationary source that emits less than 200 pounds (lb.) of VOC in every rolling period of 12 consecutive calendar months from adhesive and sealant operations • Assembling, manufacturing and repairing of aerospace components • Graphic arts operations |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1168 – Adhesive and Sealant Applications (Amended 11/4/22) | SJVAPCD Rule 4653 – Adhesives and Sealants (Amended 9/16/10) | SMAQMD Rule 460 – Adhesives and Sealants (Amended 11/30/00) | BAAQMD Rule 8-51 – Adhesive and Sealant Products (Amended 7/17/02) | VCAPCD Rule 74.20 – Adhesives and Sealants (Amended 10/9/18) |
|--------------|---|---|--|--|---|
| | <p>into or within the District.</p> <ul style="list-style-type: none"> • Aerosol adhesives and primers dispensed from non-refillable aerosol spray systems. • Regulated products sold in quantities of ≤1 fl. oz. • Adhesives used to glue flowers to parade floats • Adhesives used to fabricate orthotics and prosthetics under a medical doctor’s prescription • Shoe repair, luggage, and handbag adhesives • Research and development programs and quality assurance labs • Solvent welding operations used in the manufacturing of medical devices • Adhesives used in tire repair • A facility that demonstrates that the total volume of | <ul style="list-style-type: none"> • The use of adhesives in tire repair provided the label states “for tire repair use only” • The use of adhesives sold or supplied with ≤8 fluid ounces (fl. oz.) of adhesive in non-reusable containers. • Aerosol spray adhesive products • Household adhesives • Adhesive products subject to the VOC limit requirements of Rule 4605 (Aerospace Assembly and Component Coating Operations), Rule 4607 (Graphic Arts), and Rule 4681 (Rubber Tire Manufacturing) • Contact adhesives that are subject to the Consumer Product Safety Commission regulations in 16 CFR, Part 1302, that have a flash point greater than 20°F as determined pursuant to those regulations, and that | <ul style="list-style-type: none"> • Material regulated by Rule 450 (Graphic Arts Operations) and Rule 456 (Aerospace Assembly and Component Coating Operations) • Materials used for tire repair if the label states “for tire repair only” • Manufacture, maintenance, or repair of undersea-based weapon systems • Low-VOC materials containing ≤20 g/L • Materials sold or supplied in non-reusable containers to hold no more than 8 fl. oz. • Testing and evaluation of materials in R&D laboratories, QA laboratories, or analytical laboratories • Contact adhesives subject to the Consumer Product Safety Commission regulations in 16 CFR, Part 1302, provided | <ul style="list-style-type: none"> • Low usage of non-complying adhesive products <20 gal. in any calendar year • Low VOC adhesive or sealant products of <20 g VOC/L • Adhesives in the manufacture of medical equipment • Testing and evaluation of adhesive or sealant products in R&D laboratories, QA laboratories, or analytical laboratories, or to R&D facilities which produce only non-commercial products solely for R&D purposes • Adhesives and sealants applied in Rule 11-8 (Metal, Can and Coil Operations) and Rule 8-12 (Paper, Fabric and Film), Rule 8-13 (Graphic Arts Operations), and 8-23 (Flat Wood Paneling Operations) • Adhesive and sealants shipped, supplied or | <ul style="list-style-type: none"> • Screen printing operations • Assembling and manufacturing of undersea-based weapon systems • Testing and evaluation of adhesive or sealant products in any research and development or analytical laboratories • Plastic welding operations used in the manufacturing of medical devices • Tire repair operations, provided the label on the adhesive used states “For Tire Repair Only” • Field installation or repair of potable water linings and covers at potable water treatment, potable water storage, or potable water distribution facilities • Manufacturing operations of the following products: diving suits, rubber fuel |

| Rule Element | South Coast AQMD Rule 1168 – Adhesive and Sealant Applications (Amended 11/4/22) | SJVAPCD Rule 4653 – Adhesives and Sealants (Amended 9/16/10) | SMAQMD Rule 460 – Adhesives and Sealants (Amended 11/30/00) | BAAQMD Rule 8-51 – Adhesive and Sealant Products (Amended 7/17/02) | VCAPCD Rule 74.20 – Adhesives and Sealants (Amended 10/9/18) |
|--------------|--|---|--|---|--|
| | <p>noncompliant products is less than 55 gal. per facility per calendar year</p> <ul style="list-style-type: none"> Adhesives used in architectural applications, contact adhesives, special purpose contact adhesives, and adhesives used on porous substrates Regulated products used in the field installation and repair of potable water linings and covers at water treatment, storage, or water distribution facilities Regulated products with a viscosity of ≥ 200 centipoise Thermoplastic hot melt adhesives or to regulated products offered for sale as a dry mix, containing no polymer, which are ready for use or only mixed with water prior to use, and include, but are not limited to, | <p>are sold in packages that contain ≤ 128 fl. oz.</p> <ul style="list-style-type: none"> Stripping of cured adhesives, except the stripping of such materials from spray application equipment A stationary source that uses ≤ 20 gal. of sealant products in a calendar year Testing and evaluation of sealant products in research laboratories, analytical laboratories, or quality assurance laboratories The use of aerosol adhesive or aerosol adhesive primer products Adhesive products used in assembly, repair, or manufacture of undersea-based weapon systems Adhesive products used in medical equipment manufacturing operations Cyanoacrylate adhesive application processes | <p>that adhesives are sold in packages of ≤ 128 fl. oz.</p> <ul style="list-style-type: none"> Aerosol cleaning solvents at the stationary source, provided total usage does not exceed 160 fl. oz. per day Ethyl acetate to clean adhesive application equipment used in the manufacturing of transdermal drug delivery products, and fewer than 3 gal/day of ethyl acetate, averaged over a calendar month Low usage of not exceeding 55 gal. during any calendar year Cyanoacrylate adhesives Reactive adhesives | <p>sold to persons outside the District for use outside the District</p> <ul style="list-style-type: none"> Adhesive or sealants sold to any person who complies with the requirements of this rule Any manufacture of adhesives or sealants, provided the manufacturer has provided the maximum VOC content and category information for the product and the product was not sold directly to a user or a sales outlet located in the District, or the product was sold to an independent distributor located in the District that is not a subsidiary of, or under the direct control of the manufacturer VOC limits for contact bond adhesives that exceed a VOC content of 540 g/L | <p>bladders, inflatable boats, life preservers or other stand-alone elastomeric type products designed for immersion in liquids</p> <ul style="list-style-type: none"> Inkjet printer head assembly operations where the VOC content of the adhesive used for laminating is less than 100 g/L of material Thin film laminating operations of magnetic or electronic components excluding inkjet printer head assembly operations Glass bonding and priming processes in automotive convertible top manufacturing operations Any adhesive, primer, or sealant that contains less than 20 g VOC/L of material Any aerosol adhesive Any cyanoacrylate or methacrylate-based adhesive Any adhesive tape |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1168 – Adhesive and Sealant Applications (Amended 11/4/22) | SJVAPCD Rule 4653 – Adhesives and Sealants (Amended 9/16/10) | SMAQMD Rule 460 – Adhesives and Sealants (Amended 11/30/00) | BAAQMD Rule 8-51 – Adhesive and Sealant Products (Amended 7/17/02) | VCAPCD Rule 74.20 – Adhesives and Sealants (Amended 10/9/18) |
|--------------|---|---|---|--|--|
| | <p>grouts, cements, and mortars</p> <ul style="list-style-type: none"> • Products with a VOC content no more than 20 g/L, less water and less exempt compounds, or no more than 20 g/L material for low solids regulated products • Solvent welding formulations containing methylene chloride used to bond hard acrylic, polycarbonate, and polyethylene terephthalate glycol plastic fabrications, provided that the concentration of methylene chloride in any solvent welding formulation does not exceed 60% by weight; and the purchase of all solvent welding products does not exceed 20 gal. per calendar year at a single facility • Regulated products weighing ≤1 lb. or | <ul style="list-style-type: none"> • Processes using polyester bonding putties to assemble fiberglass parts at fiberglass boat manufacturing facilities and at other reinforced plastic composite manufacturing facilities • Adhesive products and sealant products shipped, supplied, or sold exclusively to persons outside the District for use outside the District • Adhesive products and sealant products sold to any person who complies with the VOC emission control system requirements • Cleaning of solar cells, laser hardware, scientific instruments, or high precision optics • Cleaning in laboratory tests and analyses, or bench scale or research and development projects • Cleaning of clutch assemblies where | | <ul style="list-style-type: none"> • ABS, CPVC, PVC, and plastic welding cement primers • Adhesives or sealants in small containers that weigh ≤1 lb. or contain ≤16 fl. oz. • Contact adhesives that are subject to the Consumer Product Safety Commission regulations in 16 CFR, Part 1302, that have a flash point greater than 20°F as determined pursuant to those regulations, and that are sold in packages that contain ≤1 gal., and that are used at a home, a construction site, or at any location other than in a facility • Facilities using Contact Bond Adhesive primarily for special substrates where ≥80% of the annual contact bond adhesive use at a single facility meets the definition of “Contact Bond | <ul style="list-style-type: none"> • Any low pressure (less than 250 psi) or high pressure (1,000 to 1,300 psi) two-component spray polyurethane foam system that uses exempt organic compounds as the blowing agent and that uses ancillary spray equipment and hoses to apply the foam • Any one-component spray polyurethane foam system in a cylinder (containing not less than 10 lb. and not more than 23 lb. of prepolymerized mixtures) that uses exempt organic compounds as the blowing agent and that uses ancillary spray equipment or hoses to apply the foam • Any person who uses less than 10 gal. per rolling period (consisting of 12 consecutive calendar months) per stationary |

| Rule Element | South Coast AQMD Rule 1168 – Adhesive and Sealant Applications (Amended 11/4/22) | SJVAPCD Rule 4653 – Adhesives and Sealants (Amended 9/16/10) | SMAQMD Rule 460 – Adhesives and Sealants (Amended 11/30/00) | BAAQMD Rule 8-51 – Adhesive and Sealant Products (Amended 7/17/02) | VCAPCD Rule 74.20 – Adhesives and Sealants (Amended 10/9/18) | |
|--------------|---|--|---|--|---|-------------------|
| | <p>consist of ≤16 fl. oz. and have VOC content limits, unless used exclusively in the manufacture or construction of the goods or commodities or used in pollution-generating activities that take place at stationary sources, excluding maintenance and repair</p> <ul style="list-style-type: none"> Manufacturer or supplier of regulated products provided the product sells to an independent distributor, informed in writing, including electronic formats, by the manufacturer or supplier, the regulated product is not used in the District | <p>rubber bonds to metal by means of an adhesive</p> <ul style="list-style-type: none"> Cleaning of paper-based gaskets | | <p>Adhesive - Special Substrates”</p> <ul style="list-style-type: none"> Tire retread adhesive in retreading off-the-road and industrial tires that are rated or used for non-highway service and have a minimum nominal rim diameter of 20 inches Self-curing adhesives and sealants with reactive diluents | <p>source of an adhesive, a sealant, or primer in a separate formulation provided the total volume of noncomplying adhesives, sealants, or primers at a stationary source does not exceed 55 gal. per rolling period (consisting of 12 consecutive calendar months)</p> | |
| Requirements | VOC Limits, g/L | | | | | |
| | Category | South Coast AQMD Rule 1168 | SJVAPCD Rule 4653 | SMAQMD Rule 460 | BAAQMD Rule 8-51 | VCAPCD Rule 74.20 |
| | Adhesives | | | | | |
| | Architectural applications | | | | | |
| | Building envelope membrane adhesive | 250 | - | - | - | - |
| | Carpet pad adhesive | 50 | - | - | - | 50 |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Requirements | VOC Limits, g/L | | | | | |
|--------------|---|----------------------------|-------------------|-----------------|------------------|-------------------|
| | Category | South Coast AQMD Rule 1168 | SJVAPCD Rule 4653 | SMAQMD Rule 460 | BAAQMD Rule 8-51 | VCAPCD Rule 74.20 |
| | Ceramic glass, porcelain, & stone tile adhesive | 65 | 65 | 130 | 130 | 65 |
| | Cove base adhesive | 50 | 50 | 150 | 150 | 50 |
| | Dry wall and panel adhesive | 50 | 50 | -- | - | 50 |
| | Multi-purpose construction adhesives | 70 | 70 | 200 | 200 | 70 |
| | Roofing | | | | | |
| | Hot applied modified bitumen/built up roof adhesive | 30 | - | - | - | - |
| | EPDM/TPO single ply roof membrane adhesive | 250 | - | - | - | -- |
| | Single ply roof membrane adhesive (except EPDM/TPO) | 250 | 250 | 250 | 250 | 250 |
| | Shingle laminating adhesive | 30 | - | - | - | - |
| | All other roof adhesives | 250 | 300 | - | 300 | 300 |
| | Rubber floor adhesive | 60 | 60 | - | - | 60 |
| | Structural glazing adhesive | 100 | 100 | 100 | 100 | 100 |
| | Structural wood member adhesive | 140 | 140 | - | - | 140 |
| | Subfloor adhesive | 50 | 50 | - | - | 50 |
| | VCT and asphalt tile adhesive | 50 | 50 | - | - | 50 |
| | Wood flooring adhesive | 20 | 100 | - | - | 20 |
| | All other indoor floor covering adhesives | 50 | 150 | 150 | 150 | - |
| | Computer diskette manufacturing adhesive | 350 | - | 850 | 850 | - |
| | Contact adhesive | 80 | 80 | 250 | - | 80 |
| | Edge glue adhesive | 250 | - | - | - | - |
| | Plastic welding cement | | | | | |
| | ABS welding cement | 325 | 325 | 400 | 400 | 325 |
| | ABS to PVC transition cement | 425 | 250 | -- | -- | 510 |
| | CPVC welding cement | 400 | 490 | 490 | 490 | 490 |
| | CPVC for life-safety systems | 490 | - | - | - | - |
| | Higher viscosity CPVC | 490 / 400 (7/1/24) | - | - | - | - |
| | PVC welding cement | 425 | 510 | 510 | - | 510 |
| | All other plastic welding cements | 100 | 250 | 450 | 500 | 500 |
| | Rubber vulcanization adhesive | 850 / 250 (1/1/28) | 850 | - | 850 | - |

| Requirements | VOC Limits, g/L | | | | | |
|--------------|---|-------------------------------|----------------------|--------------------|---------------------|----------------------|
| | Category | South Coast AQMD Rule 1168 | SJVAPCD Rule 4653 | SMAQMD Rule 460 | BAAQMD Rule 8-51 | VCAPCD Rule 74.20 |
| | Special purpose contact adhesive | 250 | 250 | - | - | 250 |
| | Thin metal laminating adhesive | 780 | 780 | 780 | 780 | - |
| | Tire tread adhesive | 100 | 100 | 100 | 100 | 100 |
| | Top and trim adhesive | 540 / 250 (1/1/28) | 540 | - | 540 | 540 |
| | Waterproof resorcinol glue | 170 | 170 | 170 | 170 | - |
| | All other adhesives | 250 | - | - | - | - |
| | Substrate Specific Adhesives | | | | | |
| | Metal | 30 | 30 | 30 | 30 | 30 |
| | Plastic foams | 50 | 50 | 250 | -- | 50 |
| | Porous material (except wood) | 50 | 50 | 120 | 120 | 50 |
| | Wood | 30 | 30 | 250 | 120 | 30 |
| | Fiberglass | 80 | 80 | 200 | - | 80 |
| | Reinforced plastic composite | 200 | 200 | 250 | - | - |
| | Sealants | | | | | |
| | Architectural applications | | | | | |
| | Clear, paintable, and immediately water-resistant sealant | 380 / 250 (1/1/26) | - | - | - | - |
| | Foam insulation | 5%^ | 250 | - | - | 250 |
| | One-component foam sealant | 18%^ | - | - | - | - |
| | High-pressure two-component foam sealant | 5%^ | - | - | - | - |
| | Low-pressure two-component foam sealant | 5%^ | - | - | - | - |
| | Grout | 65 | 250 | - | - | - |
| | Roadway sealant | 250 | 250 | 250 | 250 | 250 |
| | Non-staining plumbing putty | 50 | 250 | - | - | 50 |
| | Potable water sealant | 100 | 250 | - | - | 100 |
| | Roofing | | | | | |
| | Single ply roof membrane sealant (except cut edge) | 250 | 450 | 450 | 450 | - |
| | Cut edge single ply roof membrane sealant | 250 | - | - | - | - |
| | All other roof sealants | 300 | 250 | 300 | 300 | 300 |
| | All other architectural sealants | 50 | 250 | 250 | 250 | 50 |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Requirements | VOC Limits, g/L | | | | | |
|--------------|----------------------------|----------------------------|-------------------|-----------------|------------------|-------------------|
| | Category | South Coast AQMD Rule 1168 | SJVAPCD Rule 4653 | SMAQMD Rule 460 | BAAQMD Rule 8-51 | VCAPCD Rule 74.20 |
| | Marine deck sealant | 760 | 760 | 250 | 760 | 760 |
| | All other sealants | 250 | 420 | 420 | 420 | 250 |
| | Adhesive Primers | | | | | |
| | Plastic | 550 | 650 | 400 | 650 | - |
| | Pressure sensitive | 785 | 250 | - | - | 785 |
| | Traffic marking tape | 150 | - | 150 | 150 | 150 |
| | Vehicle glass | 700 | 700 | 700 | 700 | 700 |
| | Roof adhesive primers | 250 | - | 250 | - | - |
| | All other adhesive primers | 250 | 250 | 250 | 250 | 250 |
| | Sealant Primers | | | | | |
| | Architectural applications | | | | | |
| | Non-porous | 250 | - | 250 | 250 | 250 |
| | Porous | 775 | - | 775 | 775 | 775 |
| | Marine deck | 760 | 760 | 760 | - | 760 |
| | Modified bituminous | 500 | 500 | - | - | 250 |
| | Roof sealant primers | 750 | - | - | - | - |
| | All other sealant primers | 750 | 750 | 750 | 750 | 750 |

^ VOC limit expressed as percent VOC by weight.

Note: Numbers after slash (/) are VOC limits at future effective dates in parentheses.

6. *Other (Cleaning and Surface Coatings)*

a. Overview

Major source category 299 – Other (Cleaning and Surface Coatings) accounts for 0.04 tpd of NO_x and 0.65 tpd of VOC emissions in the Basin's 2037 summer planning inventory. The only emissions in this source category are associated with facilities that use ethylene oxide and unspecified materials and solvents.

b. Evaluation

The small quantity of NO_x emissions is attributable to five facilities. Upon evaluation of facility permits, it was determined that these NO_x emissions are due to the operation of fuel combustion equipment (e.g., gas fired thermal oxidizers, heaters, etc.). For further analysis of these sources, refer to the fuel combustion section of this document.

The VOC emissions in this source category are regulated by South Coast AQMD Rule 442 – Usage of Solvents (Amended December 15, 2000), Rule 1144 – Metal Working Fluids and Direct Contact Lubricants (Amended July 8, 2010), and Rule 1171 – Solvent Cleaning Operations (Amended May 1, 2009). Rules 442 and 1171 were already examined under other categories (see 220 – Degreasing), thus only Rule 1144 is evaluated in this section (see Table 4-44). South Coast AQMD Rule 1144 already has the most stringent measures in place and is as stringent as VCAPCD Rule 74.31.

Finally, South Coast AQMD regulates facilities that use ethylene oxide under Rule 1405 – Control of Ethylene Oxide Emissions from Sterilization and Related Operations. While the primary purpose of this rule is to reduce toxic emissions of ethylene oxide, some of the requirements may also result in VOC co-benefits. For example, Rule 1405 requires operators of large and medium facilities to operate a Permanent Total Enclosure vented to pollution controls and facilities are further required to implement fence-line monitoring with a provision to curtail operations if ethylene oxide levels exceed thresholds. However, Rule 1405 does not explicitly control VOC emissions and therefore it was not further evaluated.

c. Conclusion

South Coast AQMD staff evaluated the cleaning and surface coatings source category for a potential contingency measure and concluded that there is no suitable contingency measure because the most stringent feasible controls are already in place, and no additional emission reduction opportunities could be identified.

**TABLE 4-44
COMPARISON OF SOUTH COAST AQMD AND OTHER AIR DISTRICTS' RULES FOR OTHER
(CLEANING AND SURFACE COATINGS)**

| Rule Element | South Coast AQMD Rule 1144 – Metal Working Fluids and Direct-Contact Lubricants (Amended 7/9/10) | VCAPCD Rule 74.31 – Metalworking Fluids and Direct-Contact Lubricants (Amended 11/12/13) |
|---------------|--|--|
| Applicability | <p>All persons who use metalworking fluids and direct-contact lubricants on products and parts during manufacture and assembly; and all manufacturers and suppliers who supply, sell, or offer for sale metalworking fluids and direct-contact lubricants for use at industrial facilities; all VOC containing fluids used for metalworking including metal removal, metal forming, metal treating or lubricating operations where the metalworking fluid or direct-contact lubricant comes into direct contact with products and parts including, but not limited to, blanking, broaching, coining, cutting, drilling, drawing, forming, forging, grinding, heading, honing, lapping, marquenching, milling, piercing, quenching, roll forming, rolling, stamping, tapping, threading, turning and wire drawing; and VOC containing fluids used for metal protection, including rust and corrosion prevention and inhibition, during the manufacture and assembly of products and parts</p> | <p>Any person who uses metalworking fluids or direct-contact lubricants on products or parts; and to any manufacturer or supplier who supplies, sells, or offers for sale either metalworking fluids or direct-contact lubricants for use at industrial or commercial facilities; all reactive VOC-containing fluids used for metalworking including, but not limited to, metal removal, metal forming, metal treating, or lubricating operations where the metalworking fluid or direct-contact lubricant come into contact with products or parts including, but not limited to, blanking, broaching, coining, cutting, drilling, drawing, forming, forging, grinding, heading, honing, lapping, marquenching, milling, piercing, quenching, roll forming, rolling, stamping, tapping, threading, turning, and wire drawing; and VOC-containing fluids used for metal protection, including rust and corrosion prevention and inhibition, but shall not apply to coatings, sealants, adhesives, or lubricants regulated by other District rules including, but not limited to, Rule 74.12 (Surface Coating of Metal Parts and Products), or 74.13 (Aerospace Assembly and Component Manufacturing Operations)</p> |
| Exemptions | <ul style="list-style-type: none"> • Metalworking fluids and direct-contact lubricants subject to the California Air Resources Board consumer products regulation found in 17 CCR beginning at Section 94507 • Metalworking fluids and direct-contact lubricants sold in this District for shipment outside of this District or for shipment to other manufacturers for repackaging | <ul style="list-style-type: none"> • Metalworking fluids and direct-contact lubricants subject to the California Air Resources Board consumer products regulation found in 17 CCR beginning at Section 94507 • Use of any metalworking fluid or direct-contact lubricant subject to ARB Consumer Product Regulations and applied via a hand-held prepressurized non-refillable aerosol |

| Rule Element | South Coast AQMD Rule 1144 – Metal Working Fluids and Direct-Contact Lubricants (Amended 7/9/10) | VCAPCD Rule 74.31 – Metalworking Fluids and Direct-Contact Lubricants (Amended 11/12/13) | |
|--------------|--|---|-------------------|
| | <ul style="list-style-type: none"> • Metalworking fluids and direct-contact lubricants subject to VOC limits in other Regulation XI rule • Lapping, sinker EDM, avionics and assembled aircraft, space vehicle components, and fluid utilizing the control device option • Facilities that demonstrate that total permitted and non-permitted facility VOC emissions do not exceed 4 tons in any calendar year, including emissions from the Super Compliant Material, as shown by annual purchase record • Use of dimethyl carbonate used as a cooling solvent in computed numerically controlled (CNC) machines where permeable media are used to maintain a vacuum that holds the part in place during cutting provided that the equipment existed at the time of rule adoption, is enclosed and an exhaust fan discharges the exhaust air from the equipment outside of the building | <p>product, provided 100 cans or less per calendar year are used based on purchase and/or usage records</p> <ul style="list-style-type: none"> • Use of any metalworking fluid or direct contact lubricant for the purpose of maintaining or repairing operator-owned machine tools • Research operations • The Sales Prohibition in Subsection B.2 shall not apply to metalworking fluids and direct-contact lubricants sold in this District for shipment and use outside of this district or for shipment to other manufacturers for repackaging • Lapping, sinker EDM, avionics, assembled aircraft or any assembled aircraft component, space vehicle components, and fluids utilizing the control equipment option • Metalworking fluids that are “Super Compliant,” (VOC content is ≤50 g/L of material). If a shop uses both super compliant and non-super compliant materials, the administrative requirements still apply to the non-super compliant materials. Any person claiming this exemption shall provide documentation or other evidence to substantiate this claim, upon request of APCD personnel. This exemption does not apply to metalworking fluids used at metal forging operations | |
| Requirements | VOC Limits, g/L | | |
| | Fluid | South Coast AQMD Rule 1144 | VCAPCD Rule 74.31 |
| | Vanishing oil | 50 | 50 |
| | Metalworking fluid | - | - |
| | Metal forming | 75 | 75 |
| | Metal removal | - | - |
| | General | 75 | 75 |
| | Precision metal removal | 130 | 130 |
| | Metal treating | 75 | 75 |

| Rule Element | South Coast AQMD Rule 1144 – Metal Working Fluids and Direct-Contact Lubricants (Amended 7/9/10) | VCAPCD Rule 74.31 – Metalworking Fluids and Direct-Contact Lubricants (Amended 11/12/13) | |
|--------------|--|--|-----|
| | Metal protecting | - | - |
| | General | 50 | 50 |
| | Military specified preservative | 340 | 340 |
| | Direct-contact lubricant | 50 | 50 |

Petroleum Production and Marketing

Petroleum Production and Marketing includes four sub-categories: 310 – Oil and Gas Production, 320 – Petroleum Refining, 330 – Petroleum Marketing, and 399 – Other (Petroleum Production and Marketing). As shown in Table 4-45, Petroleum Production and Marketing accounts for 20.10 tpd and 0.59 tpd of VOC and NOx emissions, respectively, with the majority of VOC and NOx emissions from Petroleum Marketing and Petroleum Refining, respectively. Petroleum Production and Marketing facilities also operate fuel combustion equipment. However, those emissions are quantified separately in the inventory and the associated evaluation of potential contingency measures is presented in the Fuel Combustion section.

**TABLE 4-45
PETROLEUM PRODUCTION AND MARKETING EMISSIONS BASED ON 2037 SUMMER
PLANNING INVENTORY IN THE SOUTH COAST AIR BASIN**

| Major Source Category | VOC (tpd) | NOx (tpd) |
|--|--------------|-------------|
| 310 – Oil and Gas Production | 4.47 | 0.01 |
| 320 – Petroleum Refining | 4.44 | 0.55 |
| 330 – Petroleum Marketing | 11.15 | 0.02 |
| 399 – Other (Petroleum Production and Marketing) | 0.04 | 0.01 |
| Total | 20.10 | 0.59 |

As Petroleum Production and Marketing source categories contribute to substantial VOC emissions and comparatively few NOx emissions, much of the ensuing evaluation focuses on VOC control measures. South Coast AQMD regulates emissions from the Petroleum Production and Marketing major source categories through multiple rules as shown in the Table 4-46.

**TABLE 4-46
SOUTH COAST AQMD RULES FOR PETROLEUM PRODUCTION AND MARKETING MAJOR
SOURCE CATEGORIES**

| Major Source Category | Applicable South Coast AQMD Rules |
|------------------------------|---|
| 310 – Oil and Gas Production | Rule 462 – Organic Liquid Loading Rule 463 – Organic Liquid Storage Rule 1118.1 – Control of Emissions from Non-Refinery Flares |

| Major Source Category | Applicable South Coast AQMD Rules |
|--|--|
| | Rule 1148 – Thermally Enhanced Oil Recovery Wells Rule 1148.1 – Oil and Gas Production Wells Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers Rule 1176 – VOC Emissions from Wastewater Systems |
| 320 – Petroleum Refining | Rule 462 – Organic Liquid Loading Rule 463 – Organic Liquid Storage Rule 464 – Wastewater Separators Rule 465 – Refinery Vacuum-Producing Devices or Systems Rule 466 – Pumps and Compressors Rule 466.1 – Valves and Flanges Rule 467 – Pressure Relief Devices Rule 1109.1 – Emissions of Oxides of Nitrogen from Petroleum Refineries and Related Operations Rule 1118 – Control of Emissions from Refinery Flares Rule 1123 – Refinery Process Turnarounds Rule 1149 – Storage Tank and Pipeline Cleaning and Degassing Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants Rule 1176 – VOC Emissions from Wastewater Systems Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities Rule 1180 – Fenceline and Community Air Monitoring for Petroleum Refineries and Related Facilities Rule 1180.1 – Fenceline and Community Air Monitoring for Other Refineries |
| 330 – Petroleum Marketing | Rule 461 – Gasoline Transfer and Dispensing Rule 461.1 – Gasoline Transfer and Dispensing for Mobile Fueling Operations Rule 462 – Organic Liquid Loading Rule 463 – Organic Liquid Storage Rule 466 – Pumps and Compressors Rule 1149 – Storage Tank and Pipeline Cleaning and Degassing Rule 1177 – Liquefied Petroleum Gas Transfer and Dispensing Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities |
| 399 – Other (Petroleum Production and Marketing) | Rule 1176 – VOC Emissions from Wastewater Systems Rule 1177 – Liquefied Petroleum Gas Transfer and Dispensing Rule 1189 – Emission from Hydrogen Plant Process Vents |

Table 4-47 presents an overview of the rules that apply to the Petroleum Production and Marketing major source categories listed in Table 4-46. The majority of these rules primarily seek to reduce VOC emissions.

TABLE 4-47
SOUTH COAST AQMD RULES FOR PETROLEUM PRODUCTION AND MARKETING

| Rules | Applicability | Control Measures |
|-------------|---|------------------|
| Rule 461 | Applies to facilities that transfer gasoline from any tank truck, trailer, or railroad tank car into a stationary storage tank and from stationary storage tank into a motor vehicle fuel tank, persons that conduct testing, installations or repairs, and manufacturers and suppliers. | See Table 4-60 |
| Rule 461.1 | Applies to mobile fueler that conducts retail or non-retail operations, persons that conduct testing, installation or repairs, and manufacturers and suppliers. | See Table 4-60 |
| Rule 462 | Applies to facilities that load organic liquids with a vapor pressure of 1.5 psia (77.5 mm Hg) or greater under actual loading conditions into any tank truck, trailer, or railroad tank car. | See Table 4-61 |
| Rule 463 | Applies to any above-ground stationary tank with a capacity of 75,000 liters (19,815 gallons) or greater used for storage of organic liquids, and any above-ground tank with a capacity between 950 liters (251 gallons) and 75,000 liters (19,815 gallons) used for storage of gasoline. | See Table 4-55 |
| Rule 464 | Applies to wastewater separators, including separator basins, skimmers, grit chambers, and sludge hoppers, used to separate petroleum-derived compounds from wastewater and wastewater separator forebay that receives the untreated, contaminated wastewater from the pre-separator flume. | See Table 4-62 |
| Rule 465 | Applies to all VOC emissions and sulfur compound emissions from any petroleum refinery vacuum-producing devices or systems including hot wells and accumulators. | See Table 4-63 |
| Rule 466 | Applies to any pump or compressor handling reactive organic compounds that has a Reid vapor pressure (RVP) greater than 80 mmHg (1.55 pounds per square inch, psi) or an absolute vapor pressure (AVP) greater than 36 mmHg (0.7 psi) at 20°C. | See Table 4-62 |
| Rule 466.1 | Applies to valves and flanges in reactive organic compound services applicable to petroleum refineries, chemical plants, and oil production fields. | See Table 4-62 |
| Rule 467 | Applies to a pressure relief valve (PRV) handling VOC used at refineries and chemical plants. | See Table 4-62 |
| Rule 1109.1 | Applies to petroleum refineries and facilities with related operations to petroleum refineries | See Table 4-10 |
| Rule 1118 | Applies to all flares used at refineries, sulfur recovery plants, and hydrogen production plants. | See Table 4-49 |
| Rule 1118.1 | Applies to owners and operators of flares that require a South Coast AQMD permit at non-refinery facilities including, but not limited to, oil and gas production facilities, wastewater treatment facilities, landfills, and organic liquid handling facilities. | See Table 4-49 |

| Rules | Applicability | Control Measures |
|-------------|--|--|
| Rule 1123 | Applies to refinery process unit turnaround. | See Table 4-64 |
| Rule 1148 | Applies to thermally enhanced oil recovery wells. | See Table 4-50 |
| Rule 1148.1 | Applies to onshore oil producing wells, well cellars, and produced gas handling operation and maintenance activities at onshore facilities where petroleum and processed gas are produced, gathered, separated, processed and stored. | See Table 4-50 |
| Rule 1148.2 | Applies to any operator of an onshore oil and gas, or injection well located in the South Coast AQMD that is conducting drilling, well completion, rework, or acidizing. Also applies to suppliers selling or distributing a chemical to the operator of an onshore oil or gas well for use as a drilling fluid, well completion fluid, or rework. | See Table 4-50 |
| Rule 1149 | Applies to the cleaning and degassing of a pipeline opened to atmosphere outside the boundaries of a facility, stationary tank, reservoir, or other container, storing or last used to store VOC. | See Table 4-58 |
| Rule 1173 | Applies to components at refineries, chemical plants, lubricating oil and grease re-refiners, marine terminals, oil and gas production fields, natural gas processing plants, and pipeline transfer stations. | See Tables 4-51 and 4-52 |
| Rule 1176 | Applies to wastewater systems and associated control equipment located at petroleum refineries, on-shore oil production fields, off-shore oil production platforms, chemical plants, and industrial facilities. | See Table 4-53 |
| Rule 1177 | Applies to the transfer and dispensing of LPG from any cargo tank, stationary storage tank or cylinder into any other cargo tank, stationary storage tank, cylinder, or portable storage tank. | See Table 4-57 |
| Rule 1178 | Applies to aboveground Storage Tanks at petroleum facilities with capacity equal to or greater than 75,000 liters (19,815 gallons) storing Organic Liquid; and (2) Storage Tanks with a Potential For VOC Emissions of 6 tons per year used in Crude Oil And Natural Gas Production Operations. | See Table 4-55 |
| Rule 1180 | Applies to Petroleum Refineries, Related Facilities, and their successors. | See Section 5. Miscellaneous/Other Fugitive Losses |
| Rule 1180.1 | Applies to refineries that refine crude oil, Alternative feedstocks, or both crude oil and alternative feedstocks including, but not limited to, asphalt plants including their successors. | See Section 5. Miscellaneous/Other Fugitive Losses |
| Rule 1189 | Applies to all hydrogen plants that produce any hydrogen for use in petroleum refining operations. | See Table 4-65 |

Most VOC emissions are fugitive in nature and are due to losses or leaks resulting from extraction and production, transportation and distribution, storage, refining, transfer, vehicle refueling, and fuel

dispensing. The analysis of feasible contingency measures is anticipated to be similar depending on the process that gives rise to the fugitive emissions. Rather than perform the evaluation for individual emission sources, staff identified six unique fugitive processes across all emission source categories: Refining Process Fugitive Losses, Storage Tanks and Related Losses, Gas Transmission Losses, Fuel Transfer and Dispensing Losses, Miscellaneous/Other Fugitive Losses, and Cargo Tanks Fugitive Losses. An evaluation of potential contingency measures for each of these processes is presented below.

1. Refining Process Fugitive Losses

a. Overview

VOC emissions occur when VOC are leaked from components and/or released from atmospheric process pressure relief devices (PRDs) at petroleum facilities and chemical plants, which include sumps and pits, mud degassing, valves, flanges, fittings, and pumps. Other sources of VOC emissions include oil and gas production sites like well cellars and steam drive wells; petroleum refining processes including cooling towers, wastewater treatment, catalytic cracking, and coking; and vapor recovery/flares at non-refinery facilities. Refining Process Fugitive Losses account for 7.37 tpd of VOC and 0.56 tpd of NO_x in 2037. This category is further segregated by applicable sub-categories shown in Table 4-48.

TABLE 4-48
REFINING PROCESS FUGITIVE EMISSIONS BASED ON 2037 SUMMER PLANNING
INVENTORY

| Source Category | VOC (tpd) | NOx (tpd) |
|---|-------------|-------------|
| 300 – Fugitive Losses - Sumps and Pits | 0.04 | 0.00 |
| 301 – Fugitive Losses - Mud Degassing | 0.59 | 0.00 |
| 302 – Fugitive Losses - Valves | 1.44 | 0.00 |
| 303 – Fugitives: Flanges | 0.05 | 0.00 |
| 304 – Fugitive Losses - Fittings | 1.72 | 0.00 |
| 306 – Fugitive Losses - Pumps | 0.05 | 0.00 |
| 308 – Fugitive Losses - Compressors | 0.01 | 0.00 |
| 310 – Fugitive Losses - Well Heads | 0.00 | 0.00 |
| 311 – Pneumatic Devices / Controllers | 0.10 | 0.00 |
| 312 – Fugitive Losses - Well Cellars | 0.52 | 0.00 |
| 313 – Gas Actuated Pneumatic Pumps | 0.01 | 0.00 |
| 314 – Fugitive Losses - Oil/Water Separators | 0.02 | 0.00 |
| 315 – Fugitives: Open Ended Lines | 0.00 | 0.00 |
| 317 – Gas Well Venting - Blowdowns | 0.00 | 0.00 |
| 320 – Vapor Recovery/Flares | 0.23 | 0.11 |
| 333 – Dehydrators | 0.39 | 0.00 |
| 338 – Cooling Towers | 0.40 | 0.00 |
| 340 – Wastewater Treatment | 0.97 | 0.00 |
| 342 – Tertiary Oil Production - Steam Drive Wells | 0.01 | 0.00 |
| 352 – Wet Gas Stripping/Field Separator Fugitive Losses | 0.03 | 0.00 |
| 356 – Natural Gas Production | 0.00 | 0.00 |
| 358 – Catalytic Cracking | 0.49 | 0.45 |
| 360 – Coking | 0.27 | 0.00 |
| 362 – Vacuum Distillation | 0.00 | 0.00 |
| Total | 7.37 | 0.56 |

These sources are subject to multiple South Coast AQMD rules including Rules 1109.1, 1118, 1118.1, 1148, 1148.1, 1148.2, 1173, and 1176. The evaluation is further divided into Vapor Recovery/Flares, Oil and Gas Production Wells, Liquid and Gas/Vapor Leaks, and Other Refining Operations.

b. Evaluation

i. Vapor Recovery/Flares

South Coast AQMD’s Rules 1118 and 1118.1 control emissions from refinery flares and non-refinery flares, respectively. Rule 1118, adopted in 1998 and last amended on April 5, 2024, has various requirements for flaring operations, including performance targets, flare minimization plans (FMPs), flare event notification,

monthly emissions reporting, and specific cause analysis. Rule 1118 establishes a VOC emission limit of 100 pounds during flare events; events exceeding the limit require a detailed specific cause analysis and corrective measures. Rule 1118.1 was adopted on January 4, 2019 to reduce NOx and VOC emissions from flaring produced gas, digester gas, landfill gas, and other combustible gases or vapors and to encourage alternatives to flaring. Non-refinery facilities include oil and gas production facilities, wastewater treatment facilities, landfills, organic liquid handling facilities, and others. Rule 1118.1 establishes NOx and VOC emission limits and provides exemptions for low-use and low-emitting flares. Emission reductions from implementation of Rule 1118.1 began in 2022 and will reach their maximum level in 2025 when the rule will be fully implemented.

South Coast AQMD's Rules 1118 and 1118.1 are compared to BAAQMD Rules 12-11 and 12-12, SJVAPCD Rule 4311, VCAPCD Rule 74.35, SBCAPCD Rule 359, and SDAPCD Rule 69.7 in Table 4-49.

Refinery Flares

For hydrogen clean service flares, the NOx performance target in Rule 1118 is 0.3 pounds per million standard cubic feet (lb/MMScf) of hydrogen production capacity. Rule 1118 addresses LPG flares by instituting a throughput threshold of 15,000 MMBtu/year, which is lower than the threshold in SJVAPCD Rule 4311 (25,000 MMBtu/year for flares at oil and gas operations or chemical operations). Operators are expected to comply with the more stringent threshold by installing an LPG recovery system (i.e., refrigeration/chiller system) or implementing flare operation changes through installing a new LPG flare or retrofitting an existing LPG flare, resulting in lower NOx emissions. Meanwhile, VOC emission limits for flares are identical among the agencies. Therefore, staff concludes that Rule 1118 has the most stringent requirements.

Non-refinery Flares

NOx limits under Rule 1118.1 are as stringent as those in other jurisdictions. Rule 1118.1 and SJVAPCD Rule 4311 both require either flare throughput reduction or flare replacement to meet emission limits when the applicable annual capacity threshold is exceeded. However, each jurisdiction takes a different approach to setting annual capacity thresholds. Rule 1118.1 sets annual thresholds based on a percentage of capacity that a flare is used, while SJVAPCD Rule 4311 sets annual thresholds based on heat capacity in MMBtu per year. If a flare under Rule 1118.1 exceeds its annual capacity threshold, then the operator of the flare is required to take action to reduce the throughput or comply with more stringent emission limits. Meanwhile, VOC emission limits for flares are identical among the agencies. While direct comparison of rule requirements is challenging due to the different structures of the rules, staff concludes that Rule 1118.1 is generally as stringent as those from other agencies.

**TABLE 4-49
COMPARISON OF SOUTH COAST AQMD RULES 1118 AND 1118.1 WITH RULES AT OTHER AGENCIES**

| Rule Element | South Coast AQMD Rule 1118 – Control of Emissions from Refinery Flares (Amended 4/5/24) and Rule 1118.1 – Control of Emissions from Non-Refinery Flares (Adopted 1/4/19) | BAAQMD Rule 12-11 – Flare Monitoring at Refineries (Amended 11/3/21) and Rule 12-12 – Flares at Refineries (Amended 11/3/21) | SJVAPCD Rule 4311 – Flares (Amended 12/17/20) | VCAPCD Rule 74.35 – Flares (Adopted 9/12/23) | SBCAPCD Rule 359 – Flares and Thermal Oxidizers (Amended 5/16/24) | SDAPCD Rule 69.7 – Landfill Gas Flares (Adopted 3/9/23) |
|---------------|--|--|---|--|---|--|
| Applicability | <p><u>1118</u> Flaring operations at petroleum refineries, sulfur recovery plants, and hydrogen production plants</p> <p><u>1118.1</u> Non-refinery facilities, including, but not limited to, oil and gas production facilities, wastewater treatment facilities, landfills, and organic liquid handling facilities</p> | Flares at refineries | Operations involving the use of flares | Applies to any owners and operators of flares or flare stations where the total rated heat input for the unit is 1 MMBtu/hour or greater | Flares and thermal oxidizers at oil and gas production sources, petroleum refinery and related sources, natural gas services and transportation sources and wholesale trade in petroleum/petroleum products | All landfill gas flares at a municipal solid waste (MSW) landfill where the aggregate actual or potential emissions, from such flares, are at or above the federal major stationary source threshold for NOx |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1118 – Control of Emissions from Refinery Flares (Amended 4/5/24) and Rule 1118.1 – Control of Emissions from Non-Refinery Flares (Adopted 1/4/19) | BAAQMD Rule 12-11 – Flare Monitoring at Refineries (Amended 11/3/21) and Rule 12-12 – Flares at Refineries (Amended 11/3/21) | SJVAPCD Rule 4311 – Flares (Amended 12/17/20) | VCAPCD Rule 74.35 – Flares (Adopted 9/12/23) | SBCAPCD Rule 359 – Flares and Thermal Oxidizers (Amended 5/16/24) | SDAPCD Rule 69.7 – Landfill Gas Flares (Adopted 3/9/23) |
|--------------|--|---|--|--|---|---|
| Requirements | <p><u>1118</u></p> <ul style="list-style-type: none"> • Monitor and record data on refinery and related flaring operations and to control and minimize flaring and related emissions • Notify South Coast AQMD of flare events (both planned and unplanned) • Minimize all flaring, except during emergencies, shutdowns, startups, and turnarounds | <ul style="list-style-type: none"> • Reduce emissions from flares at refineries by minimizing the frequency and magnitude of flaring • Monitoring flares in several ways that include vent gas flow and composition, pilots and purging, and video monitoring • Contains management practices for flaring such as flare minimization plans, operating and design | <ul style="list-style-type: none"> • Reduce flaring activities with emission limits, operation limits, requirements to monitor, record, and report flaring activities • NOx, VOC, and CO emission limits by operation category for flares at oil and gas, chemical, landfill, digester, or organic liquid loading operations • NOx and VOC emission limits for ground level enclosed flares • If emission limits cannot be met the operator must limit | <ul style="list-style-type: none"> • NOx, CO, and VOC emission limits for flares installed, replaced, or relocated • For flares combusting produced gas at a facility with estimated annual emissions of ≥ 5 tons of ROC or NOx, or ≥ 100 tons of CO per year: <ul style="list-style-type: none"> ○ A replaced flare’s annual throughput is limited to no more | <ul style="list-style-type: none"> • Contains requirements for flares and thermal oxidizers including sulfur content limits, flare minimization plans, and emergency event provisions • NOx and VOC emission limits for ground level flares and thermal oxidizers exceeding 120,000 standard cubic feet per day | <ul style="list-style-type: none"> • The landfill gas flare shall be properly maintained and operational at all times • In the event the landfill gas flare is inoperable, the gas mover equipment shall be shut down and closed within one hour • Monitoring and record keeping requirements • NOx and CO emission limits for enclosed landfill flares |

| Rule Element | South Coast AQMD Rule 1118 – Control of Emissions from Refinery Flares (Amended 4/5/24) and Rule 1118.1 – Control of Emissions from Non-Refinery Flares (Adopted 1/4/19) | BAAQMD Rule 12-11 – Flare Monitoring at Refineries (Amended 11/3/21) and Rule 12-12 – Flares at Refineries (Amended 11/3/21) | SJVAPCD Rule 4311 – Flares (Amended 12/17/20) | VCAPCD Rule 74.35 – Flares (Adopted 9/12/23) | SBCAPCD Rule 359 – Flares and Thermal Oxidizers (Amended 5/16/24) | SDAPCD Rule 69.7 – Landfill Gas Flares (Adopted 3/9/23) |
|--------------|---|--|---|--|---|---|
| | <ul style="list-style-type: none"> • Monitor emissions and submit quarterly emissions report • Meet performance target for sulfur dioxide emissions of less than 0.5 tons per million barrels of crude processing capacity, averaged over one year • Any facility that exceeds performance targets must submit flare minimization plan and pay mitigation fees | standards, recordkeeping and reporting requirements | flaring to the required annual throughput <ul style="list-style-type: none"> • If annual throughput thresholds are exceeded for two consecutive years, flare operator must replace or modify flare to meet applicable NOx and VOC limits • Refineries meet performance target for sulfur dioxide emissions of less than 0.5 tons per million barrels of crude processing capacity, averaged over one year | than 110% of the average annual throughput for three calendar years immediately preceding the submittal of the flare application. If not available, the annual throughput is limited to no more than 45 MMscf/yr | | |

| Rule Element | South Coast AQMD Rule 1118 – Control of Emissions from Refinery Flares (Amended 4/5/24) and Rule 1118.1 – Control of Emissions from Non-Refinery Flares (Adopted 1/4/19) | BAAQMD Rule 12-11 – Flare Monitoring at Refineries (Amended 11/3/21) and Rule 12-12 – Flares at Refineries (Amended 11/3/21) | SJVAPCD Rule 4311 – Flares (Amended 12/17/20) | VCAPCD Rule 74.35 – Flares (Adopted 9/12/23) | SBCAPCD Rule 359 – Flares and Thermal Oxidizers (Amended 5/16/24) | SDAPCD Rule 69.7 – Landfill Gas Flares (Adopted 3/9/23) |
|--------------|--|--|---|---|---|---|
| | <p>for excess emissions <u>1118.1</u></p> <ul style="list-style-type: none"> • Reduce NOx and VOC emissions from flaring produced gas, digester gas, landfill gas, and other combustible gases or vapors and to encourage alternatives to flaring • Comply with applicable NOx, VOC, and CO emission limits • Comply with annual percent capacity | | | <ul style="list-style-type: none"> ○ A new flare’s (not replacing an existing flare) annual throughput is limited to no more than 45 MMscf/yr • If the annual percent capacity exceeds the threshold for two consecutive years, submit a flare reduction plan with a statement of intent no later than 90 days of | | |

| Rule Element | South Coast AQMD Rule 1118 – Control of Emissions from Refinery Flares (Amended 4/5/24) and Rule 1118.1 – Control of Emissions from Non-Refinery Flares (Adopted 1/4/19) | BAAQMD Rule 12-11 – Flare Monitoring at Refineries (Amended 11/3/21) and Rule 12-12 – Flares at Refineries (Amended 11/3/21) | SJVAPCD Rule 4311 – Flares (Amended 12/17/20) | VCAPCD Rule 74.35 – Flares (Adopted 9/12/23) | SBCAPCD Rule 359 – Flares and Thermal Oxidizers (Amended 5/16/24) | SDAPCD Rule 69.7 – Landfill Gas Flares (Adopted 3/9/23) |
|--------------|---|---|---|---|---|---|
| | | | | the second exceedance | | |
| Exemption | <p><u>1118</u></p> <ul style="list-style-type: none"> Flaring as a result of a catastrophic event including a major fire or an explosion at the facility Constitutes a safety hazard to the sampling personnel at the sampling location approved in the Flare Monitoring and Recording Any sulfur dioxide emissions from flare events caused by external power curtailment | <ul style="list-style-type: none"> Flares that are used to control emissions from organic liquid storage, loading racks, marine vessel loading terminals, wastewater treatment systems, and pump seals | <ul style="list-style-type: none"> Flares used for well testing, tank degassing, and pipeline degassing operations Flares that combust regeneration gas Emergency flares not subject to emission limits Flares operated at municipal solid waste landfills that combust less than 2,000 million standard cubic feet (MMscf) of landfill gas per calendar year and that have | <ul style="list-style-type: none"> Flares at <1 MMBtu/hour Routing only propane or butane or a combination of propane and butane directly into the flame burner Flares at a landfill that collects <2,000 MMScf of landfill gas per year and has either ceased accepting waste or is classified as an inert waste disposal | <ul style="list-style-type: none"> Burning of sulfur, hydrogen sulfide, acid sludge or other sulfur compounds in the manufacturing of sulfur or sulfur compounds Burning of any gas with a net heating value of less than 300 Btu/scf provided the fuel used to incinerate such gas does not contain sulfur compounds in excess of the rules set limits | <ul style="list-style-type: none"> Standards, Test Methods, Source Test Requirements of this rule shall not apply to an existing open landfill gas flare, which commenced operation on or before March 9, 2023 |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1118 – Control of Emissions from Refinery Flares (Amended 4/5/24) and Rule 1118.1 – Control of Emissions from Non-Refinery Flares (Adopted 1/4/19) | BAAQMD Rule 12-11 – Flare Monitoring at Refineries (Amended 11/3/21) and Rule 12-12 – Flares at Refineries (Amended 11/3/21) | SJVAPCD Rule 4311 – Flares (Amended 12/17/20) | VCAPCD Rule 74.35 – Flares (Adopted 9/12/23) | SBCAPCD Rule 359 – Flares and Thermal Oxidizers (Amended 5/16/24) | SDAPCD Rule 69.7 – Landfill Gas Flares (Adopted 3/9/23) |
|--------------|---|--|---|---|--|---|
| | <p>beyond the operator’s control (excluding interruptible service agreements), natural disasters or acts of war or terrorism 1118.1</p> <ul style="list-style-type: none"> Flares at asphalt plants, biodiesel plants, hydrogen production plants fueled in part with refinery gas, petroleum refineries, sulfuric acid plants, and sulfur recovery plants | | <p>ceased accepting waste</p> <ul style="list-style-type: none"> Flares that combust only propane or butane or a combination of propane and butane | <p>site or an asbestos contaminated waste disposal site</p> <ul style="list-style-type: none"> Flares used for well testing, tank degassing, and pipeline degassing Flares that combust regeneration gas Flares that emit <30 lb of NOx per month Flares that operate ≤200 hours per calendar year or 12-month rolling total, or | <ul style="list-style-type: none"> Permitted flares at 1.7 MMBTU/hr or less are exempt from emission limits Emergency Flares | |

| Rule Element | South Coast AQMD Rule 1118 – Control of Emissions from Refinery Flares (Amended 4/5/24) and Rule 1118.1 – Control of Emissions from Non-Refinery Flares (Adopted 1/4/19) | BAAQMD Rule 12-11 – Flare Monitoring at Refineries (Amended 11/3/21) and Rule 12-12 – Flares at Refineries (Amended 11/3/21) | SJVAPCD Rule 4311 – Flares (Amended 12/17/20) | VCAPCD Rule 74.35 – Flares (Adopted 9/12/23) | SBCAPCD Rule 359 – Flares and Thermal Oxidizers (Amended 5/16/24) | SDAPCD Rule 69.7 – Landfill Gas Flares (Adopted 3/9/23) |
|----------------------------|---|--|--|--|---|---|
| | <ul style="list-style-type: none"> Flares subject to South Coast AQMD Rule 1147 Flares routing only propane or butane or a combination of propane and butane directly into the flare burner Flares at a landfill that collects less than 2,000 MMscf of landfill gas per calendar year and has either ceased accepting waste | | | with an annual throughput limit equivalent to 200 hours at rated heat input capacity or less per year or 12-month rolling total, where emergency flaring is not included in the 200-hour or equivalent limit | | |
| Annual Capacity Thresholds | <u>1118.1</u> Non-refineries, expressed as the percentage of | | <ul style="list-style-type: none"> Oil and gas and chemical operations: 25,000 MMBtu/year | <ul style="list-style-type: none"> Flare gas percent capacity: | | |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1118 – Control of Emissions from Refinery Flares (Amended 4/5/24) and Rule 1118.1 – Control of Emissions from Non-Refinery Flares (Adopted 1/4/19) | BAAQMD Rule 12-11 – Flare Monitoring at Refineries (Amended 11/3/21) and Rule 12-12 – Flares at Refineries (Amended 11/3/21) | SJVAPCD Rule 4311 – Flares (Amended 12/17/20) | VCAPCD Rule 74.35 – Flares (Adopted 9/12/23) | SBCAPCD Rule 359 – Flares and Thermal Oxidizers (Amended 5/16/24) | SDAPCD Rule 69.7 – Landfill Gas Flares (Adopted 3/9/23) |
|---------------------|--|--|--|---|---|---|
| | capacity used to flare gas: <ul style="list-style-type: none"> • Any gas combusted in an open flare: 5% • Digester gas: 70% • Landfill gas: 20% • Produced gas: 5% | | <ul style="list-style-type: none"> • Landfill operations: 90,000 MMBtu/year • Digester operations: 100,000 MMBtu/year • Organic liquid loading operations: 25,000 MMBtu/year | <ul style="list-style-type: none"> ○ Any gas combusted in an open flare: 5% ○ Digester gas: 70% ○ Landfill gas: 20% ○ Produced gas: 20% | | |
| VOC Emission Limits | <ul style="list-style-type: none"> • Flares for digester gas: <ul style="list-style-type: none"> ○ Major facility: 0.038 lb/MMBtu • Flares for landfill gas: 0.038 lb/MMBtu • Flares for produced gas: 0.008 lb/MMBtu | | <ul style="list-style-type: none"> • Flares for digester gas: <ul style="list-style-type: none"> ○ Major source: 0.038 lb/MMBtu • Flares at landfill operations: 0.038 lb/MMBtu • Flares at oil and gas/chemical operations: 0.008 lb/MMBtu | <ul style="list-style-type: none"> • Flares for digester gas: <ul style="list-style-type: none"> ○ Major facility: 0.038 lb/MMBtu • Flares for landfill gas: 0.038 lb/MMBtu • Flares for produced gas: | Enclosed flare exceeding 120,000 scf/day: <ul style="list-style-type: none"> • Without steam-assist: <ul style="list-style-type: none"> ○ <10 MMBtu/hr: 0.0051 lb/MMBtu ○ 10-100 MMBtu/hr: | |

| Rule Element | South Coast AQMD Rule 1118 – Control of Emissions from Refinery Flares (Amended 4/5/24) and Rule 1118.1 – Control of Emissions from Non-Refinery Flares (Adopted 1/4/19) | BAAQMD Rule 12-11 – Flare Monitoring at Refineries (Amended 11/3/21) and Rule 12-12 – Flares at Refineries (Amended 11/3/21) | SJVAPCD Rule 4311 – Flares (Amended 12/17/20) | VCAPCD Rule 74.35 – Flares (Adopted 9/12/23) | SBCAPCD Rule 359 – Flares and Thermal Oxidizers (Amended 5/16/24) | SDAPCD Rule 69.7 – Landfill Gas Flares (Adopted 3/9/23) |
|--------------|--|--|---|--|---|---|
| | | | <ul style="list-style-type: none"> • Ground-level enclosed flares VOC emission standards based on heat release rate: <ul style="list-style-type: none"> ○ Without steam-assist: <ul style="list-style-type: none"> ▪ <10 MMBtu: 0.0051 lb/MMBtu ▪ 10-100 MMBtu: 0.0027 lb/MMBtu • >100 MMBtu: 0.0013 lb/MMBtu ○ With steam-assist <ul style="list-style-type: none"> • All: 0.14 lb/MMBtu | 0.008 lb/MMBtu | <ul style="list-style-type: none"> ○ 0.0027 lb/MMBtu ○ >100 MMBtu/hr: 0.0013 lb/MMBtu • With steam-assist: 0.14 lb/MMBtu (as TOG) | |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1118 – Control of Emissions from Refinery Flares (Amended 4/5/24) and Rule 1118.1 – Control of Emissions from Non-Refinery Flares (Adopted 1/4/19) | BAAQMD Rule 12-11 – Flare Monitoring at Refineries (Amended 11/3/21) and Rule 12-12 – Flares at Refineries (Amended 11/3/21) | SJVAPCD Rule 4311 – Flares (Amended 12/17/20) | VCAPCD Rule 74.35 – Flares (Adopted 9/12/23) | SBCAPCD Rule 359 – Flares and Thermal Oxidizers (Amended 5/16/24) | SDAPCD Rule 69.7 – Landfill Gas Flares (Adopted 3/9/23) |
|---------------------|--|--|--|---|--|---|
| | | | as total organic gas (TOG) | | | |
| NOx Emission Limits | <p><u>1118.1</u> Non-refineries:</p> <ul style="list-style-type: none"> • Digester gas at major source: 0.025 lb/MMBtu • Digester gas at minor source: 0.06 lb/MMBtu • Landfill gas: 0.025 lb/MMBtu • Produced gas: 0.018 lb/MMBtu • Other flare gas: 0.06 lb/MMBtu | | <ul style="list-style-type: none"> • Digester operations at major source: 0.025 lb/MMBtu • Digester operations not at major source: 0.060 lb/MMBtu • Landfill operations: 0.025 lb/MMBtu • Flares at oil and gas operations or chemical operations: 0.018 lb/MMBtu • Organic liquid loading operations: 0.034 lb/1,000 gallons loaded | <ul style="list-style-type: none"> • Flares for digest gas: <ul style="list-style-type: none"> ○ Major facility: 0.025 lb/MMBtu ○ Minor facility: 0.06 lb/MMBtu • Flares for landfill gas: 0.025 lb/MMBtu • Flares for produced gas: 0.018 lb/MMBtu • Other flare gas: 0.06 lb/MMBtu | <p>Enclosed flare exceeding 120,000 scf/day:</p> <ul style="list-style-type: none"> • Without steam-assist: <ul style="list-style-type: none"> ○ <10 MMBtu/hr: 0.0952 lb/MMBtu ○ 10-100 MMBtu/hr: 0.1330 lb/MMBtu ○ >100MMBtu /hr: 0.5240 lb/MMBtu • With steam-assist: 0.068 lb/MMBtu | <p>Enclosed landfill gas flare: 0.06 lb/MMBtu</p> |

| Rule Element | South Coast AQMD Rule 1118 – Control of Emissions from Refinery Flares (Amended 4/5/24) and Rule 1118.1 – Control of Emissions from Non-Refinery Flares (Adopted 1/4/19) | BAAQMD Rule 12-11 – Flare Monitoring at Refineries (Amended 11/3/21) and Rule 12-12 – Flares at Refineries (Amended 11/3/21) | SJVAPCD Rule 4311 – Flares (Amended 12/17/20) | VCAPCD Rule 74.35 – Flares (Adopted 9/12/23) | SBCAPCD Rule 359 – Flares and Thermal Oxidizers (Amended 5/16/24) | SDAPCD Rule 69.7 – Landfill Gas Flares (Adopted 3/9/23) |
|--------------|--|--|--|---|---|---|
| | | | Enclosed Flare: <ul style="list-style-type: none"> • Without steam-assist (100 MMBtu): 0.5240 lb/MMBtu • With steam-assist: 0.068 lb/MMBtu | <ul style="list-style-type: none"> • Reactive Organic Compound (ROC) liquid handling: <ul style="list-style-type: none"> ○ ROC liquid holding: 0.25 lb/MMBtu ○ ROC liquid transfer: 0.034 lb/1,000 gallons loaded | | |

ii. Oil and Gas Production Wells

Oil and gas extraction wells and production sites contribute the majority of VOC emissions within the Refining Process Fugitive Emissions source category. Well activities occur at multiple sites throughout the South Coast AQMD and may be found near residential communities. There are approximately 330 onshore oil or gas well facilities that conduct operations including drilling, well completion, well rework, and well injection activities.

South Coast AQMD has a collection of rules that regulate VOC emissions from oil and gas production facilities including Rule 1148 – Thermally Enhanced Oil Recovery Wells, Rule 1148.1 – Oil and Gas Production Wells, and Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers. The purpose of Rule 1148 is to reduce VOC emissions that occur during thermally enhanced oil recovery operations. Rule 1148.1 seeks further reductions of VOC emissions from wellheads, well cellars, and the handling of produced gas through use of enhanced leak detection technology, among other requirements. The purpose of Rule 1148.2 is to gather air quality-related information on oil and gas wells for drilling, well completion, rework, and acidizing.

Oil and gas production facilities are also subject to additional South Coast AQMD rules, including, but not limited to: the storage of organic liquids is subject to Rule 463 – Organic Liquid Storage; leaks from components are subject to Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants; and wastewater systems, including sumps and wastewater separators are subject to Rule 1176 – VOC Emissions from Wastewater Systems. This section focuses on evaluation of the Rule 1148 series, while the other rules are evaluated elsewhere. Leak standards and associated requirements of Rule 1173 are discussed in the Liquid and Gas/Vapor Leaks section, Rule 1176 is discussed in the Other Refining Operations section, and Rule 463 is discussed in the Storage Tanks and Related Losses section.

South Coast AQMD Rules 1148, 1148.1, and 1148.2 are compared to rules at other agencies in Table 4-50. The comparison is limited to requirements applicable to oil and gas production facilities because other air district rules have requirements for categories other than oil and gas production. Two other agencies, SJVAPCD and Colorado Air Quality Control Commission (CAQCC), require limited use of enhanced monitoring techniques utilizing Optical Gas Imaging (OGI), while VCAPCD Rule 74.10 does not. Overall, South Coast AQMD Rules 1148, 1148.1, and 1148.2 are more stringent compared to rules at other agencies because they require more frequent visual and OGI inspections.

**TABLE 4-50
COMPARISON OF SOUTH COAST AQMD RULES 1148, 1148.1, AND 1148.2 WITH RULES AT OTHER AGENCIES**

| Rule Element | South Coast AQMD Rule 1148 – Thermally Enhanced Oil Recovery Wells (Adopted 11/5/82), Rule 1148.1 – Oil and Gas Production Wells (Amended 8/2/24), and Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers (Amended 2/3/23) | SJVAPCD Rule 4409 – Components at Light Crude Oil Production Facilities, Natural Gas Production Facilities, and Natural Gas Processing Facilities (Amended 6/15/23) | VCAPCD Rule 74.10 – Components at Crude Oil and Natural Gas Production Facilities, Pipeline Transfer Stations and Natural Gas Production, Storage and Processing Facilities (Amended 12/12/23) | CAQCC Regulation Number 7 – Control of Emissions from Oil and Gas Emissions Operations (Adopted 12/20/24) |
|---------------|--|---|--|---|
| Applicability | <p><u>1148</u> Wells producing crude oil by injecting steam</p> <p><u>1148.1</u> Onshore oil producing wells, well cellars, and produced gas handling operation and maintenance activities at onshore facilities where petroleum and processed gas are produced, gathered, separated, processed and stored</p> <p><u>1148.2</u> Onshore oil and gas, or injection wells located in the South Coast AQMD that is conducting drilling, well completion, rework, or acidizing</p> | Components containing or contacting VOC streams at light crude oil production facilities, natural gas production facilities, and natural gas processing facilities | Crude oil and natural gas production facilities, pipeline transfer stations, natural gas gathering and boosting stations and natural gas processing facilities | <ul style="list-style-type: none"> Oil and gas operations that collect, store, or handle hydrocarbon liquids or produced water located at or upstream of a natural gas plant Centralized oil stabilization facilities or class II disposal well facilities that emit or have the potential to emit VOC emissions ≥ 25 tpy |

| Rule Element | South Coast AQMD Rule 1148 – Thermally Enhanced Oil Recovery Wells (Adopted 11/5/82), Rule 1148.1 – Oil and Gas Production Wells (Amended 8/2/24), and Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers (Amended 2/3/23) | SJVAPCD Rule 4409 – Components at Light Crude Oil Production Facilities, Natural Gas Production Facilities, and Natural Gas Processing Facilities (Amended 6/15/23) | VCAPCD Rule 74.10 – Components at Crude Oil and Natural Gas Production Facilities, Pipeline Transfer Stations and Natural Gas Production, Storage and Processing Facilities (Amended 12/12/23) | CAQCC Regulation Number 7 – Control of Emissions from Oil and Gas Emissions Operations (Adopted 12/20/24) |
|--------------|--|--|--|---|
| Requirements | <p><u>1148</u></p> <ul style="list-style-type: none"> VOC emissions from a steam drive not to exceed 4.5 pounds per day (lb/day) If steam drive wells are connected to a vapor control system, VOC emissions at the outlet of such a system shall average no more than 4.5 lb/day <p><u>1148.1</u></p> <ul style="list-style-type: none"> TOC concentration in the well cellar not to exceed 500 ppm using U.S. EPA Method 21 Valve keeps closed at the wellhead unless a portable container is used Organic liquid is not stored in a well cellar Organic liquid accumulated during equipment maintenance, drilling, well plugging, abandonment | <ul style="list-style-type: none"> Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations Shall not use any component that leaks in excess of applicable leak standards | <ul style="list-style-type: none"> | <ul style="list-style-type: none"> Storage tanks emitting ≥ 2 tpy of VOC (rolling 12-month total) must have air pollution control equipment achieving 95% VOC control efficiency. If a combustion device is used, it must have a 98% design destruction efficiency for VOC |

| Rule Element | South Coast AQMD Rule 1148 – Thermally Enhanced Oil Recovery Wells (Adopted 11/5/82), Rule 1148.1 – Oil and Gas Production Wells (Amended 8/2/24), and Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers (Amended 2/3/23) | SJVAPCD Rule 4409 – Components at Light Crude Oil Production Facilities, Natural Gas Production Facilities, and Natural Gas Processing Facilities (Amended 6/15/23) | VCAPCD Rule 74.10 – Components at Crude Oil and Natural Gas Production Facilities, Pipeline Transfer Stations and Natural Gas Production, Storage and Processing Facilities (Amended 12/12/23) | CAQCC Regulation Number 7 – Control of Emissions from Oil and Gas Emissions Operations (Adopted 12/20/24) |
|--------------|---|---|--|---|
| | <p>operations, or well workover shall pump out no later than two days after such operations are completed</p> <ul style="list-style-type: none"> Organic liquid may store in a portable enclosed storage vessel equipped with air pollution control equipment to reduce TOC emissions to less than 250 ppm outlet concentration Air pollution control device shall be demonstrated to be at least 95% or an outlet VOC concentration of 50 ppm <p><u>1148.2</u></p> <ul style="list-style-type: none"> Operators shall notify electronically the South Coast AQMD Executive Officer no more than 10 calendar days and no less than 72 hours before starting drilling, well | | | |

| Rule Element | South Coast AQMD Rule 1148 – Thermally Enhanced Oil Recovery Wells (Adopted 11/5/82), Rule 1148.1 – Oil and Gas Production Wells (Amended 8/2/24), and Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers (Amended 2/3/23) | SJVAPCD Rule 4409 – Components at Light Crude Oil Production Facilities, Natural Gas Production Facilities, and Natural Gas Processing Facilities (Amended 6/15/23) | VCAPCD Rule 74.10 – Components at Crude Oil and Natural Gas Production Facilities, Pipeline Transfer Stations and Natural Gas Production, Storage and Processing Facilities (Amended 12/12/23) | CAQCC Regulation Number 7 – Control of Emissions from Oil and Gas Emissions Operations (Adopted 12/20/24) |
|-------------------------|--|---|---|---|
| | completion, rework, or chemical treatment <ul style="list-style-type: none"> Suppliers shall provide detailed chemical information to operators, who then report to the Executive Officer | | | |
| Inspection Requirements | <ul style="list-style-type: none"> Daily visual inspections: <ul style="list-style-type: none"> Inspect any stuffing box not located in or above a well cellar Inspect any stuffing box or produced gas handling and control equipment located within 328 ft (100 m) of a sensitive receptor Weekly visual inspections: <ul style="list-style-type: none"> Inspect any stuffing box located in or above a well cellar Monthly visual inspections: <ul style="list-style-type: none"> Inspect any stuffing box fitted with a stuffing box | <ul style="list-style-type: none"> Daily audio-visual inspections: <ul style="list-style-type: none"> Inspect accessible pumps, compressors, and pressure relief devices (PRDs) at manned facilities every 24 hours Weekly audio-visual inspections: <ul style="list-style-type: none"> Inspect accessible pumps, compressors, and PRDs at unmanned facilities weekly Quarterly inspections: | <ul style="list-style-type: none"> Natural gas facilities: <ul style="list-style-type: none"> Inspect all operating pump seals, compressor seals, and pressure relief valves once per operating shift or every eight hours Crude oil and natural gas production facilities: <ul style="list-style-type: none"> Inspect all operating pump seals, compressor seals, pressure relief valves, pressure-vacuum relief valves, hatches, and polished rod stuffing boxes daily at | <ul style="list-style-type: none"> The use of an OGI camera can be utilized as part of an approved leak detection and repair plan Leak detection thresholds are quantified using a toxic vapor analyzer (TVA) or equivalent device <p><u>Storage Tank Inspection</u></p> <ul style="list-style-type: none"> Weekly inspect air pollution control equipment Storage tanks emitting ≥ 4 tpy (on a rolling 12-month total) must conduct audio, visual, and olfactory inspections |

| Rule Element | South Coast AQMD Rule 1148 – Thermally Enhanced Oil Recovery Wells (Adopted 11/5/82), Rule 1148.1 – Oil and Gas Production Wells (Amended 8/2/24), and Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers (Amended 2/3/23) | SJVAPCD Rule 4409 – Components at Light Crude Oil Production Facilities, Natural Gas Production Facilities, and Natural Gas Processing Facilities (Amended 6/15/23) | VCAPCD Rule 74.10 – Components at Crude Oil and Natural Gas Production Facilities, Pipeline Transfer Stations and Natural Gas Production, Storage and Processing Facilities (Amended 12/12/23) | CAQCC Regulation Number 7 – Control of Emissions from Oil and Gas Emissions Operations (Adopted 12/20/24) |
|--------------|---|---|---|--|
| | <p>adapter, any closed crude oil collection container, and any well shut off switch</p> <ul style="list-style-type: none"> • Quarterly inspection: <ul style="list-style-type: none"> ○ Perform inspections of all well cellars according to specified test methods • Leakage response: <ul style="list-style-type: none"> ○ Conduct inspections within two days of discovering organic liquid leakage ○ Conduct inspections within eight hours if leakage is near sensitive receptors • Monthly TOC measurements: <ul style="list-style-type: none"> ○ Measure TOC on components identified as | <ul style="list-style-type: none"> ○ Inspect all components, including using U.S. EPA Method 21 • Annual inspection: <ul style="list-style-type: none"> ○ Inspect annually inaccessible and unsafe-to-monitor components ○ Visually inspect pipes annually, with follow-up testing if leaks are detected • Leak detection: <ul style="list-style-type: none"> ○ If a leak is detected during audio-visual inspections, it must be inspected using a specified test method within 24 hours • Test method <ul style="list-style-type: none"> ○ All leaks detected with the use of an OGI | <p>manned facilities and weekly at unmanned facilities</p> <ul style="list-style-type: none"> • Quarterly inspections: <ul style="list-style-type: none"> ○ Inspect all components for gaseous leaks using U.S. EPA Method 21 • Annual inspections: <ul style="list-style-type: none"> ○ Inspect annually inaccessible and unsafe-to-monitor components • Leak detection: <ul style="list-style-type: none"> ○ Measure gaseous leaks using U.S. EPA Method 21 within 24 hours of detection ○ Re-inspect new, replaced, or repaired components for leaks | <ul style="list-style-type: none"> • Each storage vessel with the potential for VOC emissions ≥ 6 tpy (controlled actual emissions) must conduct periodic performance testing of the control device <p>Well production facilities</p> <ul style="list-style-type: none"> • Facilities with uncontrolled actual VOC emissions of 1 to 6 tpy: inspect annually for component leaks using an approved instrument • Facilities with uncontrolled actual VOC emissions ≥ 6 tpy: inspect semi-annually for component leaks using an approved instrument • Repair leaks from components with any hydrocarbon above 500 ppm not associated with normal equipment operation |

| Rule Element | South Coast AQMD Rule 1148 – Thermally Enhanced Oil Recovery Wells (Adopted 11/5/82), Rule 1148.1 – Oil and Gas Production Wells (Amended 8/2/24), and Rule 1148.2 – Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers (Amended 2/3/23) | SJVAPCD Rule 4409 – Components at Light Crude Oil Production Facilities, Natural Gas Production Facilities, and Natural Gas Processing Facilities (Amended 6/15/23) | VCAPCD Rule 74.10 – Components at Crude Oil and Natural Gas Production Facilities, Pipeline Transfer Stations and Natural Gas Production, Storage and Processing Facilities (Amended 12/12/23) | CAQCC Regulation Number 7 – Control of Emissions from Oil and Gas Emissions Operations (Adopted 12/20/24) |
|--------------|---|---|--|---|
| | <p>causing or likely to cause confirmed odor events</p> <ul style="list-style-type: none"> • OGI inspections: <ul style="list-style-type: none"> ○ Conduct monthly OGI inspections on all components and well cellars ○ Quantify visible vapors within 48 hours if not repaired within 24 hours | <p>instrument shall be measured using U.S. EPA Method 21 within two days of initial OGI leak detection or within 14 days of initial OGI leak detection of an inaccessible or unsafe-to-monitor component to determine compliance with the leak thresholds and repair timeframes</p> | <p>using U.S. EPA Method 21 before returning to service</p> | |

iii. Liquid and Gas/Vapor Leaks

Leaks and releases from components, including pumps, valves, compressors, PRDs, threaded pipe connectors, and other components, at petroleum facilities and chemical plants are sources of fugitive VOC emissions. The VOC leaks from these sources are subject to South Coast AQMD's Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants. Note that Rule 1173 also applies to components at oil and gas production fields that are subject to Rule 1148.1. Thus, there is some overlap between Rule 1173 and Rule 1148.1 for sources subject to both rules.

Rule 1173 contains three ozone contingency measures that will be implemented sequentially upon U.S. EPA's determination that the Basin has failed to meet Reasonable Further Progress requirements or attain the 2008 or 2015 8-hour ozone standards. The contingency measures reduce VOC emissions by requiring more frequent OGI inspections and by lowering the leak detection thresholds that require operators to perform repairs.

Rules at other agencies that are comparable to Rule 1173 include BAAQMD Rule 8-18 and SJVAPCD Rules 4409 and 4455. SJVAPCD Rule 4409 was reviewed in the Oil and Gas Production Wells section (see Table 4-50), although the evaluation excluded gas leak standards. Gas leak standards in SJVAPCD Rule 4409, in addition to the other rules identified, are evaluated in Table 4-51.

**TABLE 4-51
COMPARISON OF SOUTH COAST AQMD RULE 1173 WITH RULES AT OTHER AGENCIES**

| Rule Element | South Coast AQMD Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants (Amended 11/1/24) | SJVAPCD Rule 4409 – Components at Light Crude Oil Production Facilities, Natural Gas Production Facilities, and Natural Gas Processing Facilities (Amended 6/15/23) and Rule 4455 – Components at Petroleum Refineries, Gas Liquids Processing Facilities, and Chemical Plants (Amended 6/15/23) | BAAQMD Rule 8-18 – Equipment Leaks (Amended 9/4/24) | | | | | | | | | | | | |
|----------------------------|--|--|---|----------------------------|------------|--------------|---------|-------------------|--------------------|----------------------------|------------|--------------|---------|---|---|
| Applicability | <ul style="list-style-type: none"> Applies to refineries, chemical plants, lubricating oil and grease re-refiners, marine terminals, oil and gas production fields, natural gas processing plants, and pipeline transfer stations | <p><u>4409</u></p> <ul style="list-style-type: none"> Applies to components containing or contacting VOC streams at light crude oil production facilities, natural gas production facilities, and natural gas processing facilities <p><u>4455</u></p> <ul style="list-style-type: none"> Applies to components containing or contacting VOC at petroleum refineries, gas liquids processing facilities, and chemical plants | <ul style="list-style-type: none"> Applies to equipment at refineries, chemical plants, bulk plants, and bulk terminals including, but not limited to: valves, connections, pumps, compressors, pressure relief devices, diaphragms, hatches, sight-glasses, fittings, sampling ports, meters, pipes, vessels, plugs, and gauges | | | | | | | | | | | | |
| Violation Standards | <ul style="list-style-type: none"> Interim Violation Standards (prior to 1/1/26) <table border="1" data-bbox="367 966 823 1149"> <thead> <tr> <th>Component service</th> <th>Interim violation standard</th> </tr> </thead> <tbody> <tr> <td>Light liquid and gas/vapor</td> <td>50,000 ppm</td> </tr> <tr> <td>Heavy liquid</td> <td>500 ppm</td> </tr> </tbody> </table> Violation Standards (effective 1/1/26) <table border="1" data-bbox="367 1242 823 1416"> <thead> <tr> <th>Component service</th> <th>Violation standard</th> </tr> </thead> <tbody> <tr> <td>Light liquid and gas/vapor</td> <td>10,000 ppm</td> </tr> <tr> <td>Heavy liquid</td> <td>500 ppm</td> </tr> </tbody> </table> | Component service | Interim violation standard | Light liquid and gas/vapor | 50,000 ppm | Heavy liquid | 500 ppm | Component service | Violation standard | Light liquid and gas/vapor | 10,000 ppm | Heavy liquid | 500 ppm | <p><u>4409</u></p> <ul style="list-style-type: none"> A component shall be considered in violation if one or more conditions exist: <ul style="list-style-type: none"> An open-ended line or a valve located at the end of the line is not sealed, or a second valve is not closed at all times; A component has a major liquid leak; A component has a gas leak >50,000 ppm; or A component leak of the following conditions and numbering in excess of the maximum allowable number or percent specified below <ul style="list-style-type: none"> A minor liquid leak; A minor gas leak; or A gas leak >10,000 ppm up to 50,000 ppm | - |
| Component service | Interim violation standard | | | | | | | | | | | | | | |
| Light liquid and gas/vapor | 50,000 ppm | | | | | | | | | | | | | | |
| Heavy liquid | 500 ppm | | | | | | | | | | | | | | |
| Component service | Violation standard | | | | | | | | | | | | | | |
| Light liquid and gas/vapor | 10,000 ppm | | | | | | | | | | | | | | |
| Heavy liquid | 500 ppm | | | | | | | | | | | | | | |

| Rule Element | South Coast AQMD Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants (Amended 11/1/24) | SJVAPCD Rule 4409 – Components at Light Crude Oil Production Facilities, Natural Gas Production Facilities, and Natural Gas Processing Facilities (Amended 6/15/23) and Rule 4455 – Components at Petroleum Refineries, Gas Liquids Processing Facilities, and Chemical Plants (Amended 6/15/23) | BAAQMD Rule 8-18 – Equipment Leaks (Amended 9/4/24) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|--|---|-----------------------------------|---------|-----|---------|---------------------|---------|---|---------|----------------|---------------|---------------------------------|---------|-----|---------|-------------------|---------|---|---------|---------|---------|--|-------------------|----------------|----------------|--|----------------|-------------------|------|---------|------------|------------|--------|---------|------------|------------|-------------------|----------------|----------------|--|----------------|-------------------|--------|---------|------------|------------|----------------------|---------|------------|------------|---------|---------|------------|------------|-------|---------|------------|------------|--|
| Leak Standards | <ul style="list-style-type: none"> Leak standards (prior to 1/1/26): <table border="1" data-bbox="359 451 800 914"> <thead> <tr> <th>Component type</th> <th>Interim leak standard</th> </tr> </thead> <tbody> <tr> <td>Compressor or pump (light liquid)</td> <td>500 ppm</td> </tr> <tr> <td>PRD</td> <td>200 ppm</td> </tr> <tr> <td>Pump (heavy liquid)</td> <td>100 ppm</td> </tr> <tr> <td>Valve, fitting, or other devices (diaphragm, hatch, sight-glass, meter)</td> <td>500 ppm</td> </tr> </tbody> </table> Leak standards (effective 1/1/26): <table border="1" data-bbox="359 954 800 1414"> <thead> <tr> <th>Component type</th> <th>Leak standard</th> </tr> </thead> <tbody> <tr> <td>Compressor or light liquid pump</td> <td>400 ppm</td> </tr> <tr> <td>PRD</td> <td>200 ppm</td> </tr> <tr> <td>Heavy liquid pump</td> <td>100 ppm</td> </tr> <tr> <td>Valve, fitting, or other devices (diaphragm, hatch, sight-glass, meter)</td> <td>100 ppm</td> </tr> <tr> <td>Fin fan</td> <td>100 ppm</td> </tr> </tbody> </table> | Component type | Interim leak standard | Compressor or pump (light liquid) | 500 ppm | PRD | 200 ppm | Pump (heavy liquid) | 100 ppm | Valve, fitting, or other devices (diaphragm, hatch, sight-glass, meter) | 500 ppm | Component type | Leak standard | Compressor or light liquid pump | 400 ppm | PRD | 200 ppm | Heavy liquid pump | 100 ppm | Valve, fitting, or other devices (diaphragm, hatch, sight-glass, meter) | 100 ppm | Fin fan | 100 ppm | <p><u>4409</u></p> <ul style="list-style-type: none"> Gas leak standards (ppm as methane) <table border="1" data-bbox="884 483 1528 662"> <thead> <tr> <th rowspan="2">Type of component</th> <th rowspan="2">Major gas leak</th> <th colspan="2">Minor gas leak</th> </tr> <tr> <th>Liquid service</th> <th>Gas/Vapor service</th> </tr> </thead> <tbody> <tr> <td>PRDs</td> <td>>10,000</td> <td>200–10,000</td> <td>400–10,000</td> </tr> <tr> <td>Others</td> <td>>10,000</td> <td>500–10,000</td> <td>500–10,000</td> </tr> </tbody> </table> <ul style="list-style-type: none"> Major liquid leak: a visible mist or a continuous flow of liquid Minor liquid leak: a liquid leak, except seal lubricant, that is not a major liquid leak and drips liquid at a rate of >3 drops/minute <p><u>4455</u></p> <ul style="list-style-type: none"> Gas leak standards (ppm as methane) <table border="1" data-bbox="884 954 1528 1382"> <thead> <tr> <th rowspan="2">Type of component</th> <th rowspan="2">Major gas leak</th> <th colspan="2">Minor gas leak</th> </tr> <tr> <th>Liquid service</th> <th>Gas/Vapor service</th> </tr> </thead> <tbody> <tr> <td>Valves</td> <td>>10,000</td> <td>200–10,000</td> <td>400–10,000</td> </tr> <tr> <td>Threaded connections</td> <td>>10,000</td> <td>200–10,000</td> <td>400–10,000</td> </tr> <tr> <td>Flanges</td> <td>>10,000</td> <td>200–10,000</td> <td>400–10,000</td> </tr> <tr> <td>Pumps</td> <td>>10,000</td> <td>500–10,000</td> <td>500–10,000</td> </tr> </tbody> </table> | Type of component | Major gas leak | Minor gas leak | | Liquid service | Gas/Vapor service | PRDs | >10,000 | 200–10,000 | 400–10,000 | Others | >10,000 | 500–10,000 | 500–10,000 | Type of component | Major gas leak | Minor gas leak | | Liquid service | Gas/Vapor service | Valves | >10,000 | 200–10,000 | 400–10,000 | Threaded connections | >10,000 | 200–10,000 | 400–10,000 | Flanges | >10,000 | 200–10,000 | 400–10,000 | Pumps | >10,000 | 500–10,000 | 500–10,000 | <ul style="list-style-type: none"> Leak standards: <ul style="list-style-type: none"> Valves shall not leak total organic compounds (TOC) in excess of 100 ppm Pumps and compressors shall not leak TOC in excess of 500 ppm Connections shall not leak TOC in excess of 100 ppm. PRDs shall not leak TOC in excess of 500 ppm If discovered by the operator, minimize a leak within 24 hours and repair it in seven days. If discovered by the APCO, repair it in 24 hours Non-repairable equipment leak: <ul style="list-style-type: none"> Any essential equipment leak must be <10,000 ppm and mass emissions must be determined for any leak ≥3,000 ppm within 30 days of placing on the non-repairable list Essential equipment is repaired or replaced within five years or |
| Component type | Interim leak standard | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Compressor or pump (light liquid) | 500 ppm | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| PRD | 200 ppm | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pump (heavy liquid) | 100 ppm | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Valve, fitting, or other devices (diaphragm, hatch, sight-glass, meter) | 500 ppm | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Component type | Leak standard | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Compressor or light liquid pump | 400 ppm | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| PRD | 200 ppm | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Heavy liquid pump | 100 ppm | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Valve, fitting, or other devices (diaphragm, hatch, sight-glass, meter) | 100 ppm | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Fin fan | 100 ppm | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Type of component | Major gas leak | Minor gas leak | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Liquid service | Gas/Vapor service | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| PRDs | >10,000 | 200–10,000 | 400–10,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Others | >10,000 | 500–10,000 | 500–10,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Type of component | Major gas leak | Minor gas leak | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Liquid service | Gas/Vapor service | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Valves | >10,000 | 200–10,000 | 400–10,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Threaded connections | >10,000 | 200–10,000 | 400–10,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Flanges | >10,000 | 200–10,000 | 400–10,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pumps | >10,000 | 500–10,000 | 500–10,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants (Amended 11/1/24) | SJVAPCD Rule 4409 – Components at Light Crude Oil Production Facilities, Natural Gas Production Facilities, and Natural Gas Processing Facilities (Amended 6/15/23) and Rule 4455 – Components at Petroleum Refineries, Gas Liquids Processing Facilities, and Chemical Plants (Amended 6/15/23) | BAAQMD Rule 8-18 – Equipment Leaks (Amended 9/4/24) | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------|--|--|---|---------|------|------|--|--|--------|--------|-----|---------|------|------|--|--|--------|--------|-----------------|---------|------|------|--|--|--------|--------|---|
| | <ul style="list-style-type: none"> • For a component exceeding the applicable component leak standards: <ul style="list-style-type: none"> ▪ If the component exceeds the applicable violation standards, no later than one day after detection: <ul style="list-style-type: none"> • Demonstrate the component does not emit visible vapors using an OGI device; or • Demonstrate the component does not exceed the applicable violation standards using an appropriate analyzer; and ▪ Within 14 days of detection, complete repair below the applicable component leak standards. • For a visible leak from an accessible component, eliminate the visible leak no later than one day after detection • For a visible leak from an inaccessible component: | <table border="0"> <tr> <td>Compressors</td> <td>>10,000</td> <td>500–</td> <td>500–</td> </tr> <tr> <td></td> <td></td> <td>10,000</td> <td>10,000</td> </tr> <tr> <td>PRD</td> <td>>10,000</td> <td>100–</td> <td>200–</td> </tr> <tr> <td></td> <td></td> <td>10,000</td> <td>10,000</td> </tr> <tr> <td>Other component</td> <td>>10,000</td> <td>500–</td> <td>500–</td> </tr> <tr> <td></td> <td></td> <td>10,000</td> <td>10,000</td> </tr> </table> <ul style="list-style-type: none"> • types | Compressors | >10,000 | 500– | 500– | | | 10,000 | 10,000 | PRD | >10,000 | 100– | 200– | | | 10,000 | 10,000 | Other component | >10,000 | 500– | 500– | | | 10,000 | 10,000 | <p>at the next schedule turnaround, whichever comes first</p> |
| Compressors | >10,000 | 500– | 500– | | | | | | | | | | | | | | | | | | | | | | | | |
| | | 10,000 | 10,000 | | | | | | | | | | | | | | | | | | | | | | | | |
| PRD | >10,000 | 100– | 200– | | | | | | | | | | | | | | | | | | | | | | | | |
| | | 10,000 | 10,000 | | | | | | | | | | | | | | | | | | | | | | | | |
| Other component | >10,000 | 500– | 500– | | | | | | | | | | | | | | | | | | | | | | | | |
| | | 10,000 | 10,000 | | | | | | | | | | | | | | | | | | | | | | | | |

| Rule Element | South Coast AQMD Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants (Amended 11/1/24) | SJVAPCD Rule 4409 – Components at Light Crude Oil Production Facilities, Natural Gas Production Facilities, and Natural Gas Processing Facilities (Amended 6/15/23) and Rule 4455 – Components at Petroleum Refineries, Gas Liquids Processing Facilities, and Chemical Plants (Amended 6/15/23) | BAAQMD Rule 8-18 – Equipment Leaks (Amended 9/4/24) |
|--------------|--|--|---|
| | <ul style="list-style-type: none"> ▪ Notify the Executive Officer (EO) before the end of the operating shift, not to exceed 12 hours ▪ Eliminate the visible leak within 14 days of detection • Atmospheric process PRD requirements <ul style="list-style-type: none"> • Continuously monitor atmospheric process PRDs by installing tamper-proof electronic monitoring device capable of recording the duration of each release and quantifying the amount of VOC released • Following any release, conduct a failure analysis and implement corrective actions within 30 days • At a refinery with throughput >20,000 barrels per day (bpd), connect PRDs to a vapor recovery system, no later than the next turnaround: <ul style="list-style-type: none"> ▪ Two releases, each in excess of 500 lb VOC in a continuous 24-hr period, within any five-year period from a PRD; or | | |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants (Amended 11/1/24) | SJVAPCD Rule 4409 – Components at Light Crude Oil Production Facilities, Natural Gas Production Facilities, and Natural Gas Processing Facilities (Amended 6/15/23) and Rule 4455 – Components at Petroleum Refineries, Gas Liquids Processing Facilities, and Chemical Plants (Amended 6/15/23) | BAAQMD Rule 8-18 – Equipment Leaks (Amended 9/4/24) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---------------------------------|--|--|---|-----------------|------------------|---------|--|---------------------------------|---------|---|---|--|---------------------------|---------------------------|----------------|---|-----------------------|-------------------|---|-----------------------|----------------|---|--|--|--|--|---|-----------|-----------------|------------------------|----------------------------|------|-------------------------|-----------------------|--|
| | <ul style="list-style-type: none"> ▪ One release in excess of 2,000 lb VOC in a continuous 24-hr period from any PRD • Operator may elect to pay a mitigation fee of \$625,000 for releases and any subsequent release in excess of 500 lb VOC in a continuous 24-hr period within a five-year period | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Repair Requirements | <ul style="list-style-type: none"> • Limited delay of repair: <table border="1" data-bbox="352 771 840 1234"> <thead> <tr> <th>Essential component type</th> <th>Delay leak standard</th> <th>Total # allowed</th> </tr> </thead> <tbody> <tr> <td>Valve or fitting</td> <td>500 ppm</td> <td>0.05% of facility total # of valves and fittings</td> </tr> <tr> <td>Compressor or light liquid pump</td> <td>500 ppm</td> <td>0.05% of facility total # of compressors and light liquid pumps</td> </tr> </tbody> </table> | Essential component type | Delay leak standard | Total # allowed | Valve or fitting | 500 ppm | 0.05% of facility total # of valves and fittings | Compressor or light liquid pump | 500 ppm | 0.05% of facility total # of compressors and light liquid pumps | <p><u>4409</u></p> <ul style="list-style-type: none"> • Maximum allowable leaking components per inspection: <table border="1" data-bbox="892 836 1543 1096"> <thead> <tr> <th></th> <th>≤200 components inspected</th> <th>>200 components inspected</th> </tr> </thead> <tbody> <tr> <td>500–10,000 ppm</td> <td>5</td> <td>2% of total inspected</td> </tr> <tr> <td>10,000–50,000 ppm</td> <td>2</td> <td>1% of total inspected</td> </tr> </tbody> </table> <p><u>4455</u></p> <ul style="list-style-type: none"> • Maximum allowable number or percent of leaking components per inspection period: <table border="1" data-bbox="892 1242 1543 1380"> <thead> <tr> <th>Component type</th> <th>Max. # of leaks for ≤200 components inspected</th> <th>Max. % or # of leaks for >200 components inspected</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table> | | ≤200 components inspected | >200 components inspected | 500–10,000 ppm | 5 | 2% of total inspected | 10,000–50,000 ppm | 2 | 1% of total inspected | Component type | Max. # of leaks for ≤200 components inspected | Max. % or # of leaks for >200 components inspected | | | | <ul style="list-style-type: none"> • Repair thresholds: <table border="1" data-bbox="1585 771 1984 1201"> <thead> <tr> <th>Equipment</th> <th>Total # allowed</th> </tr> </thead> <tbody> <tr> <td>Valves and connections</td> <td>0.15% of total # of valves</td> </tr> <tr> <td>PRDs</td> <td>0.5% of total # of PRDs</td> </tr> <tr> <td>Pumps and compressors</td> <td>0.5% of total # of pumps and compressors</td> </tr> </tbody> </table> | Equipment | Total # allowed | Valves and connections | 0.15% of total # of valves | PRDs | 0.5% of total # of PRDs | Pumps and compressors | 0.5% of total # of pumps and compressors |
| Essential component type | Delay leak standard | Total # allowed | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Valve or fitting | 500 ppm | 0.05% of facility total # of valves and fittings | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Compressor or light liquid pump | 500 ppm | 0.05% of facility total # of compressors and light liquid pumps | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | ≤200 components inspected | >200 components inspected | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 500–10,000 ppm | 5 | 2% of total inspected | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10,000–50,000 ppm | 2 | 1% of total inspected | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Component type | Max. # of leaks for ≤200 components inspected | Max. % or # of leaks for >200 components inspected | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Equipment | Total # allowed | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Valves and connections | 0.15% of total # of valves | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| PRDs | 0.5% of total # of PRDs | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pumps and compressors | 0.5% of total # of pumps and compressors | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Rule Element | South Coast AQMD Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants (Amended 11/1/24) | SJVAPCD Rule 4409 – Components at Light Crude Oil Production Facilities, Natural Gas Production Facilities, and Natural Gas Processing Facilities (Amended 6/15/23) and Rule 4455 – Components at Petroleum Refineries, Gas Liquids Processing Facilities, and Chemical Plants (Amended 6/15/23) | BAAQMD Rule 8-18 – Equipment Leaks (Amended 9/4/24) | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--------------------------------|---|---|--|---|---------------------|----------------------|---|---------------------|---------|---|---------------------|-------|---|---------------------|-------------|---|--------|-----|---|--------|-----------------------|---|--------|-------|-----------------|--|--|---|--|--|
| | | <table border="0"> <tr> <td>Valves</td> <td>1</td> <td>0.5% of # inspected</td> </tr> <tr> <td>Threaded connections</td> <td>1</td> <td>0.5% of # inspected</td> </tr> <tr> <td>Flanges</td> <td>1</td> <td>0.5% of # inspected</td> </tr> <tr> <td>Pumps</td> <td>2</td> <td>1.0% of # inspected</td> </tr> <tr> <td>Compressors</td> <td>1</td> <td>1 leak</td> </tr> <tr> <td>PRD</td> <td>1</td> <td>1 leak</td> </tr> <tr> <td>Other component types</td> <td>1</td> <td>1 leak</td> </tr> <tr> <td>Pipes</td> <td colspan="2" style="text-align: center;">Max. # of leaks</td> </tr> <tr> <td></td> <td colspan="2" style="text-align: center;">2</td> </tr> </table> | Valves | 1 | 0.5% of # inspected | Threaded connections | 1 | 0.5% of # inspected | Flanges | 1 | 0.5% of # inspected | Pumps | 2 | 1.0% of # inspected | Compressors | 1 | 1 leak | PRD | 1 | 1 leak | Other component types | 1 | 1 leak | Pipes | Max. # of leaks | | | 2 | | |
| Valves | 1 | 0.5% of # inspected | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Threaded connections | 1 | 0.5% of # inspected | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Flanges | 1 | 0.5% of # inspected | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pumps | 2 | 1.0% of # inspected | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Compressors | 1 | 1 leak | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| PRD | 1 | 1 leak | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Other component types | 1 | 1 leak | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pipes | Max. # of leaks | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Inspection Requirements | <ul style="list-style-type: none"> • Self-inspection requirements: <ul style="list-style-type: none"> ○ Audio-visual-olfactory (AVO) inspection of all accessible pumps, compressors, and atmospheric PRDs at least once per operating shift, and no more than 12 hours between AVO inspections ○ The same AVO inspection as above for unmanned oil and gas production and pipeline transfer stations, once per calendar week ○ Effective 10/1/25, an OGI inspection of each component | <p><u>4409</u></p> <ul style="list-style-type: none"> • Operator inspection requirements: <ul style="list-style-type: none"> ○ Daily inspections: <ul style="list-style-type: none"> ▪ Audio-visual inspection of all accessible operating pumps, compressors, and PRDs at manned facilities every 24 hours ○ Weekly inspections: <ul style="list-style-type: none"> ▪ Audio-visual inspection of all accessible operating pumps, compressors, and PRDs at unmanned facilities every week ○ Quarterly inspections: <ul style="list-style-type: none"> ▪ Inspect all components once every quarter ○ Annual inspections: | <ul style="list-style-type: none"> • All pumps and compressors shall be visually inspected daily for leaks. If a leak is observed, the concentration shall be determined within 24 hours of discovery | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Rule Element | South Coast AQMD Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants (Amended 11/1/24) | SJVAPCD Rule 4409 – Components at Light Crude Oil Production Facilities, Natural Gas Production Facilities, and Natural Gas Processing Facilities (Amended 6/15/23) and Rule 4455 – Components at Petroleum Refineries, Gas Liquids Processing Facilities, and Chemical Plants (Amended 6/15/23) | BAAQMD Rule 8-18 – Equipment Leaks (Amended 9/4/24) | | | | | | | | | | | | | | | | | | | | | | | | |
|--|---|---|---|-----------------------|--------------------------------|-----------|--|--|----------------|---|---|--|---|---|----------------------------|---|---|--------------|--|--|-------------------|---|---|-------------------|---|---|--|
| | <p>once per month, unless a component will be out of service for more than 14 days of the calendar month due to turnaround</p> <ul style="list-style-type: none"> ○ Analyzer inspection quarterly of all accessible components and annually of all inaccessible components ○ After every release from a PRD within one day and an additional analyzer inspection within 14 days | <ul style="list-style-type: none"> ▪ Inspect all pipes and all inaccessible components annually. All unsafe-to-monitor components are inspected during each turnaround • If the leak has been minimized but still exceeds the applicable leak standards, the following repair period will apply: <table border="1" data-bbox="892 657 1543 1096"> <thead> <tr> <th>Type of leak</th> <th>Repair period in days</th> <th>Extended repair period in days</th> </tr> </thead> <tbody> <tr> <td colspan="3">Gas leaks</td> </tr> <tr> <td>Minor gas leak</td> <td>7</td> <td>0</td> </tr> <tr> <td>Major gas leak >10,000 ppm but ≤50,000 ppm</td> <td>3</td> <td>2</td> </tr> <tr> <td>Major gas leak ≥50,000 ppm</td> <td>1</td> <td>0</td> </tr> <tr> <td colspan="3">Liquid leaks</td> </tr> <tr> <td>Minor liquid leak</td> <td>1</td> <td>0</td> </tr> <tr> <td>Major liquid leak</td> <td>1</td> <td>0</td> </tr> </tbody> </table> <p><u>4455</u></p> <ul style="list-style-type: none"> • Operator inspection requirements: <ul style="list-style-type: none"> ○ Daily inspections: <ul style="list-style-type: none"> ▪ Audio-visual inspection of all accessible operating pumps, compressors, and PRDs every 24 hours ○ Quarterly inspection: | Type of leak | Repair period in days | Extended repair period in days | Gas leaks | | | Minor gas leak | 7 | 0 | Major gas leak >10,000 ppm but ≤50,000 ppm | 3 | 2 | Major gas leak ≥50,000 ppm | 1 | 0 | Liquid leaks | | | Minor liquid leak | 1 | 0 | Major liquid leak | 1 | 0 | |
| Type of leak | Repair period in days | Extended repair period in days | | | | | | | | | | | | | | | | | | | | | | | | | |
| Gas leaks | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Minor gas leak | 7 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Major gas leak >10,000 ppm but ≤50,000 ppm | 3 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Major gas leak ≥50,000 ppm | 1 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Liquid leaks | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Minor liquid leak | 1 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Major liquid leak | 1 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | |

| Rule Element | South Coast AQMD Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants (Amended 11/1/24) | SJVAPCD Rule 4409 – Components at Light Crude Oil Production Facilities, Natural Gas Production Facilities, and Natural Gas Processing Facilities (Amended 6/15/23) and Rule 4455 – Components at Petroleum Refineries, Gas Liquids Processing Facilities, and Chemical Plants (Amended 6/15/23) | BAAQMD Rule 8-18 – Equipment Leaks (Amended 9/4/24) | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|--|---|-----------------------|--------------------------------|-----------|--|--|----------------|---|---|--|---|---|----------------------------|---|---|--------------|--|--|-------------------|---|---|-------------------|---|---|--|
| | | <ul style="list-style-type: none"> ▪ Audio-visual inspection of all components, except inaccessible or unsafe-to-monitor ones, or pipes, quarterly using specified test methods ○ Annual inspection: <ul style="list-style-type: none"> ▪ Inspect inaccessible components and pipes annually. Unsafe-to-monitor components are inspected during each turnaround ○ Re-inspection: <ul style="list-style-type: none"> ▪ Re-inspect components within 15 days after repair or replacement to ensure compliance • If the leak has been minimized but still exceeds the applicable leak standards, the following repair period will apply: <table border="1" data-bbox="898 911 1541 1343" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Type of leak</th> <th style="text-align: center;">Repair period in days</th> <th style="text-align: center;">Extended repair period in days</th> </tr> </thead> <tbody> <tr> <td colspan="3">Gas leaks</td> </tr> <tr> <td>Minor gas leak</td> <td style="text-align: center;">7</td> <td style="text-align: center;">7</td> </tr> <tr> <td>Major gas leak >10,000 ppm but ≤50,000 ppm</td> <td style="text-align: center;">3</td> <td style="text-align: center;">2</td> </tr> <tr> <td>Major gas leak >50,000 ppm</td> <td style="text-align: center;">1</td> <td style="text-align: center;">0</td> </tr> <tr> <td colspan="3">Liquid leaks</td> </tr> <tr> <td>Minor liquid leak</td> <td style="text-align: center;">1</td> <td style="text-align: center;">0</td> </tr> <tr> <td>Major liquid leak</td> <td style="text-align: center;">1</td> <td style="text-align: center;">0</td> </tr> </tbody> </table> | Type of leak | Repair period in days | Extended repair period in days | Gas leaks | | | Minor gas leak | 7 | 7 | Major gas leak >10,000 ppm but ≤50,000 ppm | 3 | 2 | Major gas leak >50,000 ppm | 1 | 0 | Liquid leaks | | | Minor liquid leak | 1 | 0 | Major liquid leak | 1 | 0 | |
| Type of leak | Repair period in days | Extended repair period in days | | | | | | | | | | | | | | | | | | | | | | | | | |
| Gas leaks | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Minor gas leak | 7 | 7 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Major gas leak >10,000 ppm but ≤50,000 ppm | 3 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Major gas leak >50,000 ppm | 1 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Liquid leaks | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Minor liquid leak | 1 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Major liquid leak | 1 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants (Amended 11/1/24) | SJVAPCD Rule 4409 – Components at Light Crude Oil Production Facilities, Natural Gas Production Facilities, and Natural Gas Processing Facilities (Amended 6/15/23) and Rule 4455 – Components at Petroleum Refineries, Gas Liquids Processing Facilities, and Chemical Plants (Amended 6/15/23) | BAAQMD Rule 8-18 – Equipment Leaks (Amended 9/4/24) |
|-----------------------------------|---|--|---|
| Ozone Contingency Measures | <p>Contingency Measures shall be implemented sequentially upon the issuance of a final determination by U.S. EPA that the South Coast Air Basin has failed to meet RFP or attain the 2008 or 2015 ozone NAAQS</p> <p><u>Stage 1 CM</u></p> <ul style="list-style-type: none"> ▪ Repair a compressor or pump (light liquid) detected above 300 ppm, instead of 400 ppm <p><u>Stage 2 CM</u></p> <ul style="list-style-type: none"> ▪ Conduct an OGI inspection of each component at least once every two weeks, instead of at least once per month, unless a component will be out of service for more than seven days of the two-week period due to turnaround <p><u>Stage 3 CM</u></p> <ul style="list-style-type: none"> ▪ Repair a valve, fitting, or other device (diaphragm, hatch, sight-glass, meter) detected above 50 ppm, instead of 100 ppm | - | - |

Prior to January 1, 2026, South Coast AQMD Rule 1173 has interim standards for violation leaks and component leaks which are less stringent than SJVAPCD Rule 4455. For example, the violation leak standard of light liquid/gas/vapor service component is 50,000 ppm compared to 10,000 ppm in SJVAPCD Rule 4455 as shown in Table 4-51. However, effective January 1, 2026, Rule 1173’s violation leak standard will be strengthened from 50,000 ppm to 10,000 ppm, which matches the stringency of SJVAPCD Rule 4455. Component leak standards will also be lowered from 500 ppm to 400 ppm for compressors and light liquid pumps and from 500 ppm to 100 ppm for valve, fitting, and other components. The 400 ppm leak standard for compressors and pumps in Rule 1173 is the most stringent among the rules evaluated. In addition, the operator will be in violation if visible vapors are detected by South Coast AQMD via OGI unless demonstrated to be below the violation standard. As summarized in Table 4-52, with revised leak standards effective January 1, 2026, Rule 1173’s leak standards are at least as stringent as those in other agencies’ rules.

**TABLE 4-52
SUMMARY OF COMPONENT LEAK STANDARDS IN RULE 1173 AND OTHER AGENCY RULES***

| Rule | Valves and Fittings (connectors/flanges) | Others (diaphragm, hatch, sight- glass, meter) | Pumps and Compressors | PRDs |
|---|---|---|--------------------------|--------------------------|
| South Coast AQMD Rule 1173 (prior to 1/1/26) | 500 ppm | | | 200 ppm |
| South Coast AQMD Rule 1173 (effective 1/1/26) | 100 ppm | | 400 ppm | 200 ppm (unchanged) |
| BAAQMD Rule 8-18 | 100 ppm | | 500 ppm | |
| SJVAPCD Rule 4409 | 500 ppm | | | L: 200 ppm, G/V: 400 ppm |
| SJVAPCD Rule 4455 | L: 200 ppm, G/V: 400 ppm | L: 500 ppm, G/V: 500 ppm | | L: 100 ppm, G/V: 200 ppm |

* L denotes liquid leak. G/V denotes gas/vapor leak.

iv. Other Refining-Related Operations

Other Refining Operations include wastewater treatment and oil/water separators as a potential source of VOC emissions. These operations are subject to South Coast AQMD Rule 1176 – VOC Emissions from Wastewater Systems. Rule 1176 has requirements for wastewater systems, sumps and waste separators, sewer lines, process drains, junction boxes, and air pollution control (APC) devices to control VOC emissions. These requirements are as stringent as comparable rules at other agencies, including SJVAPCD Rule 4402, AVAQMD Rule 1176, BAAQMD Rule 8-8, and VCAPCD Rule 74.8. Key requirements of each rule are summarized in Table 4-53.

Cooling towers, catalytic cracking, and coking also contribute to VOC and NOx emissions. South Coast AQMD Rule 1114 – Petroleum Refinery Coking Operations applies to all petroleum refineries equipped with delayed coking units and establishes a depressurization limit of less than 2 pounds per square inch gauge (psig) prior to venting a coke drum to the atmosphere. Rule 1114 was expected to reduce VOC emissions from petroleum refinery coking operations by more than 50 percent at the time of rule adoption. Staff did not identify any other district rule comparable to Rule 1114. South Coast AQMD Rule 1109.1 – Emissions of Oxides of Nitrogen from Petroleum Refineries and Related Operations applies to FCCUs. Catalytic cracking is a refinery process conducted in FCCUs where petroleum derivative feedstock is charged and fractured into smaller molecules in the presence of a catalyst. FCCUs are regulated by Rule 1109.1, which requires meeting NOx limits of 2 ppm and 5 ppm at 3 percent O₂ on a 365-day and seven-day rolling average, respectively, with an interim NOx limit of 40 ppm at 3 percent O₂ on a 365-day rolling average. Staff did not identify any other district rule comparable to Rule 1109.1 that regulates NOx from FCCUs. Staff also evaluated requirements for FCCUs contained in 40 CFR Part 60 Subpart Ja,⁵³ which did not reveal any more stringent requirements than those in Rule 1109.1.

The only other district rule identified as being applicable to this source category is BAAQMD's Rule 11-10 which requires the monitoring of total hydrocarbon emissions and the repair of leaks from refinery cooling towers. While South Coast AQMD does not have a VOC rule applicable to cooling towers, the 2022 AQMP included control measure FUG-02, which calls for an assessment of available control technologies and practices that can reduce VOC emissions from industrial cooling towers. The assessment will be used to inform potential future rulemaking. As FUG-02 is included in the 2022 AQMP and relied upon for attainment of the 2015 ozone standard, it is ineligible for consideration as a contingency measure. Therefore, control measures for cooling towers are not further evaluated.

⁵³ Title 40, Code of Federal Regulations (CFR) Part 60 (40 CFR Part 60), Subpart Ja. <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-Ja>

**TABLE 4-53
COMPARISON OF SOUTH COAST AQMD RULE 1176 WITH RULES AT OTHER AGENCIES**

| Rule Element | South Coast AQMD Rule 1176 – VOC Emissions from Wastewater Systems (Amended 9/13/96) | SJVAPCD Rule 4402 – Crude Oil Production Sumps (Amended 12/21/23) | BAAQMD Rule 8-8 – Wastewater Collection and Separation Systems (Amended 12/20/23) | AVAQMD Rule 1176 – Emissions from Wastewater System (Amended 9/13/96) | VCAPCD Rule 74.8 – Refinery Vacuum Producing Systems, Wastewater Separations and Process Turnaround (Amended 7/5/83) |
|----------------------|---|--|---|--|--|
| Applicability | Wastewater systems and associated control equipment located at petroleum refineries, on-shore oil production fields, off-shore oil production platforms, chemical plants, and industrial facilities | All first, second, and third stage sumps at facilities producing, gathering, separating, processing, and/or storing crude oil in an oil field | Any person who operates a wastewater collection system and/or a wastewater separation system component | Wastewater systems and associated control equipment located at petroleum refineries, on-shore oil production fields, off-shore oil production platforms, chemical plants, and industrial facilities | |
| Requirements | <ul style="list-style-type: none"> • Wastewater system VOC emissions shall not exceed 500 ppm above background levels • Sumps and wastewater separators shall have: <ul style="list-style-type: none"> ○ A floating cover equipped with seals; ○ A fixed cover equipped with a closed vent system vented to an APC; or | <ul style="list-style-type: none"> • First stage sumps are prohibited. • Second and third stage sumps shall have a control device (flexible floating cover, rigid floating cover, or fixed roof cover) properly installed, maintained, or operated | <p><u>Wastewater separators >760 L/day and <18.9 L/sec shall have one of the following:</u></p> <ul style="list-style-type: none"> • A solid, gasketed, fixed cover totally enclosing the separator tank, chamber, or basin liquid contents with all cover openings closed; • No cracks or gaps >0.125 inches in the | <ul style="list-style-type: none"> • Wastewater systems and close vent systems shall not emit VOC emissions >500 ppm above background levels • Sumps and separators shall have floating or fixed covers, or other approved control measures | <ul style="list-style-type: none"> • Inlet distribution headers or compartments shall have solid covers with sealed openings or floating covers that extend to within 0.125 inches of the compartment or header wall at all points around the perimeter |

| Rule Element | South Coast AQMD Rule 1176 – VOC Emissions from Wastewater Systems (Amended 9/13/96) | SJVAPCD Rule 4402 – Crude Oil Production Sumps (Amended 12/21/23) | BAAQMD Rule 8-8 – Wastewater Collection and Separation Systems (Amended 12/20/23) | AVAQMD Rule 1176 – Emissions from Wastewater System (Amended 9/13/96) | VCAPCD Rule 74.8 – Refinery Vacuum Producing Systems, Wastewater Separations and Process Turnaround (Amended 7/5/83) |
|--------------|--|--|--|---|---|
| | <ul style="list-style-type: none"> ○ Any other alternate control measure which is demonstrated to as effective or more effective than the above control methods ▪ Sump and wastewater separator covers, for both fixed and floating, shall: <ul style="list-style-type: none"> ○ Be impermeable to VOC and free from holes, tears, or openings ○ Drains on covers be provided with a slotted membrane fabric cover over at least 90% of the open area ○ Gauging or sampling openings on the separator be covered. Covers shall be kept closed, with no visible gaps between the cover and the separator ○ Hatches on covers shall be kept closed and free of gaps | <ul style="list-style-type: none"> • Cover material shall be impermeable to VOC, with no holes or tears • All hatches shall be kept closed and gap-free • If a sump is replaced by an above-ground tank, the tank shall comply with Rule 4623 or have a pressure/vacuum vent sent to within 10% of the maximum allowable working pressure | <p>roof or between the roof and wall;</p> <ul style="list-style-type: none"> • A floating pontoon or double-deck vapor-tight type cover <ul style="list-style-type: none"> ○ No gap between the separator wall and liquid-mounted primary seal >1.5 inch ○ No gap between the separator wall and secondary and wiper seal >0.06 inch ○ Primary and secondary seal gap inspection; or • TOC vapor recovery system with an efficiency of ≥95% <p><u>Wastewater separators ≥18.9 L/sec shall have one of the following:</u></p> | <p>to limit VOC emissions</p> <ul style="list-style-type: none"> • Sewer lines and process drains shall be enclosed and sealed to prevent VOC emissions • Junction boxes shall be totally enclosed with a solid, gasketed, fixed cover or a manhole cover. Each fixed cover shall be allowed to have an open vent pipe no more than 4 inches diameter and at least 3 feet in length. Each manhole cover shall be allowed to have openings totaling no more than 12 square inches. The | <ul style="list-style-type: none"> • Gauging and sampling devices shall have covers that remain closed |

| Rule Element | South Coast AQMD Rule 1176 – VOC Emissions from Wastewater Systems (Amended 9/13/96) | SJVAPCD Rule 4402 – Crude Oil Production Sumps (Amended 12/21/23) | BAAQMD Rule 8-8 – Wastewater Collection and Separation Systems (Amended 12/20/23) | AVAQMD Rule 1176 – Emissions from Wastewater System (Amended 9/13/96) | VCAPCD Rule 74.8 – Refinery Vacuum Producing Systems, Wastewater Separations and Process Turnaround (Amended 7/5/83) |
|--------------|---|---|---|--|--|
| | <ul style="list-style-type: none"> ○ The perimeter of a cover, except for a floating cover, form a seal free of gaps with the foundation attached to it ○ A floating cover shall be designed and maintained such that the gap between the separator or sump wall and the seal exceeds no greater than 1/8 inch for a cumulative length of 97% of the perimeter of the separator. No gap between the wall and the seal shall exceed 1/2 inch ○ For initial modification of sumps, separator forebays, clarifiers, dissolved air floating tanks, induced gas floatation tanks, or induced air floating tanks, compliance shall be achieved no later than six months after issuance | | <ul style="list-style-type: none"> ● A solid, vapor-tight, full contact fixed cover totally enclosing the separator tank, chamber, or basin liquid contents with all cover openings closed and sealed; ● A floating pontoon or double-deck vapor-tight type cover <ul style="list-style-type: none"> ○ No gap between the separator wall and liquid-mounted primary seal >1.5 inch ○ No gap between the separator wall and secondary and wiper seal >0.06 inch ○ Primary and secondary seal gap inspection; ● A vapor-tight fixed cover with a TOC | <p>manhole cover shall remain fully closed, except when opened for active inspection, maintenance, sampling, or repair</p> <ul style="list-style-type: none"> ● APC devices shall meet one of the following: <ul style="list-style-type: none"> ○ Achieve a control efficiency of ≥95% ○ Ensure VOC emissions <500 ppm above background levels ○ Any APC device or other alternative system collects vapors through a closed vent system and | |

| Rule Element | South Coast AQMD Rule 1176 – VOC Emissions from Wastewater Systems (Amended 9/13/96) | SJVAPCD Rule 4402 – Crude Oil Production Sumps (Amended 12/21/23) | BAAQMD Rule 8-8 – Wastewater Collection and Separation Systems (Amended 12/20/23) | AVAQMD Rule 1176 – Emissions from Wastewater System (Amended 9/13/96) | VCAPCD Rule 74.8 – Refinery Vacuum Producing Systems, Wastewater Separations and Process Turnaround (Amended 7/5/83) |
|--------------|---|---|--|---|--|
| | <p>of a permit to construct (PC)</p> <ul style="list-style-type: none"> • Sewer lines shall: <ul style="list-style-type: none"> ○ Be completely enclosed that no liquid surface is exposed to the atmosphere. The manhole cover remains fully closed ○ All openings in the sewer line manhole covers be completely sealed • Process drains shall be equipped water seal controls or any other alternative control measure, which is demonstrated to be at least equivalent to water seal controls in reducing VOC emissions. • Junction boxes shall: <ul style="list-style-type: none"> ○ Be totally enclosed with a solid, gasketed, fixed cover or a manhole cover ○ For initial modification of junction boxes, | | <p>vapor recovery system with an efficiency of $\geq 95\%$; or</p> <ul style="list-style-type: none"> • TOC concentration measured at the roof seals, fixed cover, access doors, pressure/vacuum valve, and other openings shall not exceed 1,000 ppm • Oil-water separator air flotation, oil-water separator effluent channel: TOC vapor recovery system with a combined efficiency of $\geq 70\%$ • Wastewater collection/separation system at refineries: $\geq 95\%$ combined efficiency. Outlet VOC emissions of 500 ppm | <p>subsequently controls the vapors in a device</p> | |

| Rule Element | South Coast AQMD Rule 1176 – VOC Emissions from Wastewater Systems (Amended 9/13/96) | SJVAPCD Rule 4402 – Crude Oil Production Sumps (Amended 12/21/23) | BAAQMD Rule 8-8 – Wastewater Collection and Separation Systems (Amended 12/20/23) | AVAQMD Rule 1176 – Emissions from Wastewater System (Amended 9/13/96) | VCAPCD Rule 74.8 – Refinery Vacuum Producing Systems, Wastewater Separations and Process Turnaround (Amended 7/5/83) |
|--------------|--|---|---|---|--|
| | <p>compliance shall be achieved no later than six months after issuance of initial PC for the DSC controls</p> <ul style="list-style-type: none"> • APC devices shall meet one of the following: <ul style="list-style-type: none"> ○ An APC device receiving vapors from a closed vent system achieves a control efficiency of ≥95% by weight of VOC ○ The outlet of the APC device does not emit VOC emissions >500 ppm above background ○ Any APC or other alternate system that collects vapors through a closed vent system and subsequently controls the vapors in a device and provides an equivalent level of VOC control as specified above | | | | |

c. Conclusion

South Coast AQMD rules are generally at least as stringent as and, in some cases, more stringent than other agencies’ rules. Therefore, staff did not identify any potential contingency measures for these rules.

2. Storage Tanks and Related Losses

a. Overview

Organic liquid storage tanks account for 0.33 tpd of VOC and zero NOx emissions in 2037. Storage tanks emit VOC through openings inherent in the tank design. Storage Tanks and Related Losses are subject to South Coast AQMD’s Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities and Rule 463 – Organic Liquid Storage. Rule 1178, amended in September 2023, requires leak detection and repair through OGI for organic liquid storage tanks at any petroleum facility that emit more than 40,000 pounds (20 tons) per year of VOC as reported in the Annual Emissions Report (AER) pursuant to Rule 301 – Permit Fees in any emission inventory year starting with the emissions inventory year 2000. There are a total of 1,093 stationary tanks subject to Rule 1178 and 55 individually permitted portable tanks and 25 permitted portable tank systems consisting of up to 20 portable tanks for each permit. In this category, there are three applicable sub-categories: Floating Roof Tanks – Working Losses, Storage Tanks: Condensate, and Fixed Roof Tanks – Working Losses. Fixed Roof Tanks – Working Losses account for the vast majority of the emissions. South Coast AQMD’s Rule 463 – Organic Liquid Storage and Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities apply to this source category as shown in Table 4-54.

**TABLE 4-54
STORAGE TANKS AND RELATED LOSSES BASED ON 2037 SUMMER PLANNING INVENTORY**

| Source Category | VOC (tpd) | NOx (tpd) |
|--|-------------|-------------|
| 321 – Tank (Unspecified) | 0.00 | 0.00 |
| 322 – Floating Roof Tanks – Breathing Losses | 0.00 | 0.00 |
| 324 – Floating Roof Tanks – Working Losses | 0.08 | 0.00 |
| 325 – Storage Tanks: Condensate | 0.01 | 0.00 |
| 326 – Fixed Roof Tanks – Breathing Losses | 0.00 | 0.00 |
| 328 – Fixed Roof Tanks – Working Losses | 0.24 | 0.00 |
| 332 – Pressure Tanks | 0.00 | 0.00 |
| Total | 0.33 | 0.00 |

Rule 463 limits VOC emissions from organic liquid storage tanks that are not subject to the requirements of Rule 1178. Rule 463 applies to (1) above-ground stationary tanks with approximate capacities of 19,800 gallons or more; (2) above-ground tanks with approximate capacities between 250 and 19,800 gallons that are used to store gasoline; and (3) any stationary tank with a potential for VOC emissions of 6 tpy or greater used in crude oil and natural gas production operations. Rule 463 applies to approximately 1,600 tanks,

including fixed roof, floating roof, or domed roof storage tanks, located at 429 facilities including refineries, bulk storage, loading, and oil production facilities within the South Coast AQMD jurisdiction.

b. Evaluation

Rule 1178 establishes requirements for rim seal gaps, secondary seals, emission control systems, doming, testing, implementation and monitoring. The rule also establishes enhanced leak detection and repair (LDAR) and more stringent control requirements. It requires weekly OGI inspections for tank farms and semi-annual OGI inspections on individual floating roof tank components. It also requires doming for crude oil tanks, and full implementation for doming will occur in 2038 for most tanks. Certain facilities have an alternative doming schedule that will require full implementation in 2041. Rule 1178 also requires secondary seals on all floating roof tanks, which will be required the next time the tank is emptied and degassed but no later than 2033.

Like Rule 1178, Rule 463 has requirements for floating or fixed roofs, rim seals, an emission control system, and OGI inspections. Last amended on June 7, 2024, Rule 463 contains a contingency measure for both the South Coast Air Basin and Coachella Valley that requires more frequent OGI inspections to facilitate leak detection and repair. If the contingency measure is triggered, it will only apply to tanks within the nonattainment area in which it was triggered.

Both Rules 1178 and 463 have gap requirements for secondary seals that are as stringent as those at other agencies such as SJVAPCD's Rule 4623 and U.S. EPA's 40 Code of Federal Regulations (CFR) Part 60, Subpart Kb. For example, the lengths of gaps greater than 1/2 inch wide cannot, when totaled together, exceed 10 percent of the length of the circumference. The length of gaps greater than 1/8 inch wide cannot, when totaled together, exceed 30 percent of the length of the circumference. Both Rules 1178 and 463 are compared with rules at other agencies in Table 4-55.

**TABLE 4-55
COMPARISON OF SOUTH COAST AQMD RULES 1178 AND 463 WITH RULES AT OTHER AGENCIES**

| Rule Element | South Coast AQMD Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities (Amended 9/1/23) | South Coast AQMD Rule 463 – Organic Liquid Storage (Amended 6/7/24) | SJVAPCD Rule 4623 – Storage of Organic Liquids (Amended 6/15/23) | BAAQMD Rule 8-5 – Storage of Organic Liquids (Amended 11/3/21) | U.S. EPA 40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 |
|----------------------|---|--|---|---|---|
| Applicability | <ul style="list-style-type: none"> • Storage tanks at facilities emitting ≥ 20 tpy in any year since 2000 that have: <ul style="list-style-type: none"> ○ Capacity of $\geq 19,815$ gallons and stores organic liquid with TVP > 0.1 psia; or ○ PTE of ≥ 6 tpy used in crude oil or natural gas production | <ul style="list-style-type: none"> • Stationary above-ground storage tanks with capacity $\geq 39,630$ gallons storing liquids with TVP of ≥ 0.5 psia • Stationary above-ground storage tanks from 19,815–39,630 gallons storing material with TVP of ≥ 1.5 psia • Above-ground storage tanks from 251 gal to 19,815 gallons storing gasoline • Any tank with PTE of ≥ 6 tpy used in crude oil or natural gas | <ul style="list-style-type: none"> • Storage tanks with capacity $\geq 1,100$ gallons | <ul style="list-style-type: none"> • Storage tanks containing organic liquids, including gasoline, solvents, and other similar materials at refineries, bulk plants, and gasoline stations | <ul style="list-style-type: none"> • Storage constructed, reconstructed or modified after July 23, 1984 with capacity of ≥ 75 m³ • Tanks with capacity of 19,185–39,889 gallons with a vapor pressure between 4 psia and 11.1 psia • Tanks with capacity $> 39,889$ gallons with vapor pressure between 0.75 psia and 11.1 psia |

| Rule Element | South Coast AQMD Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities (Amended 9/1/23) | South Coast AQMD Rule 463 – Organic Liquid Storage (Amended 6/7/24) | SJVAPCD Rule 4623 – Storage of Organic Liquids (Amended 6/15/23) | BAAQMD Rule 8-5 – Storage of Organic Liquids (Amended 11/3/21) | U.S. EPA 40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 |
|---------------------|--|---|---|--|--|
| | | production operations | | | |
| Requirements | <ul style="list-style-type: none"> • Seals/covers on all roof openings • Rim seal systems consisting of primary and secondary seals on all floating roof tanks • Vapor recovery with 98% efficiency on all fixed roof tanks • Gap requirements for primary and secondary seals • Doming for crude oil tanks | <ul style="list-style-type: none"> • Seals/covers on all roof openings • Rim seals consisting of primary and secondary seals on all floating roof tanks • Vapor recovery systems on fixed roof tanks with at least 98% reduction by weight • Gap requirements for primary and secondary floating roof seals • Doming for external floating roof tanks storing organic liquids with a TVP of ≥ 3.0 psia | <ul style="list-style-type: none"> • Seals and covers on all roof openings • Rim seal systems consisting of primary and secondary seals on all floating roof tanks • Vapor recovery with minimum efficiency of 95% by volume on all fixed roof tanks • Gap requirements for primary and secondary seals | <ul style="list-style-type: none"> • Vapor recovery with an overall abatement efficiency of $\geq 95\%$ on all fixed roof tanks. • Gap requirements for secondary seals | <ul style="list-style-type: none"> • Seals and covers on all roof openings • Rim seals consisting of primary and secondary seals • Vapor recovery of 95% by volume on all fixed roof tanks • Gap requirements for primary and secondary seals • Fixed roofs with internal floating roofs only require one seal • External floating roofs require two seal system ≥ 76.6 kPa (11 psia) must have a control device or equivalent (fixed roof |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule Element | South Coast AQMD Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities (Amended 9/1/23) | South Coast AQMD Rule 463 – Organic Liquid Storage (Amended 6/7/24) | SJVAPCD Rule 4623 – Storage of Organic Liquids (Amended 6/15/23) | BAAQMD Rule 8-5 – Storage of Organic Liquids (Amended 11/3/21) | U.S. EPA 40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 |
|-------------------|---|--|---|--|--|
| | | <ul style="list-style-type: none"> Contingencies for the applicable ozone NAAQS | | | and internal floating roof) |
| Monitoring | <ul style="list-style-type: none"> Periodic gap measurements for floating roof tanks Periodic Method 21 measurements for fixed roof tanks Weekly OGI monitoring for all tanks and additional semi-annual OGI inspections for floating roof tanks | <ul style="list-style-type: none"> Periodic gap measurements for floating roof tanks OGI tank farm monitoring every two weeks for all tanks and additional semi-annual OGI inspections for floating roof tanks | <ul style="list-style-type: none"> Annual gap measurements for external floating roof tanks Gap measurements for internal floating roof tanks at least once every 60 months Voluntary annual visual and U.S. EPA Method 21 inspections for all tanks | <ul style="list-style-type: none"> Periodic gap measurements for floating roof tanks Visual inspections of internal floating roof tanks twice per year | <ul style="list-style-type: none"> Measurements of gaps between the tank wall and the primary seal (seal gaps) shall be performed during the hydrostatic testing of the vessel or within 60 days of the initial fill with volatile organic liquid and at least once every five years thereafter Measurements of gaps between the tank wall and the secondary seal shall be performed within 60 days of the initial |

| Rule Element | South Coast AQMD Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities (Amended 9/1/23) | South Coast AQMD Rule 463 – Organic Liquid Storage (Amended 6/7/24) | SJVAPCD Rule 4623 – Storage of Organic Liquids (Amended 6/15/23) | BAAQMD Rule 8-5 – Storage of Organic Liquids (Amended 11/3/21) | U.S. EPA 40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 |
|--------------|--|---|--|--|---|
| | | | | | fill with volatile organic liquid and at least once per year thereafter |

c. Conclusion

South Coast AQMD’s Rule 1178 and Rule 463 are at least as stringent as and, in some areas, more stringent than rules at other agencies for Storage Tanks and Related Losses. Therefore, staff did not identify any potential contingency measures for these rules.

3. Gas Transmission and Dispensing Losses

a. Overview

The Gas Transmission and Dispensing Losses category accounts for 4.22 tpd of VOC and zero NOx emissions in 2037. In this category, there are three applicable sub-categories: Natural Gas Transmission Losses, LPG Transfer and Dispensing Losses, and Storage Tanks and Pipeline Cleaning and Degassing. LPG Transfer and Dispensing Losses account for the vast majority of the emissions. South Coast AQMD’s Rule 1149 – Storage Tank and Pipeline Cleaning and Degassing and Rule 1177 – Liquefied Petroleum Gas Transfer and Dispensing apply to this source category as shown in Table 4-56.

**TABLE 4-56
GAS TRANSMISSION AND DISPENSING EMISSIONS BASED ON 2037 SUMMER PLANNING
INVENTORY**

| Source Category | VOC (tpd) | NOx (tpd) |
|---|-------------|-------------|
| 318 – Natural Gas Transmission Losses | 0.43 | 0.00 |
| 319 – LPG Transfer and Dispensing Losses | 3.70 | 0.00 |
| 386 – Storage Tanks and Pipeline Cleaning and Degassing | 0.09 | 0.00 |
| Total | 4.22 | 0.00 |

b. Evaluation

South Coast AQMD Rule 1177 applies to the transfer of LPG to and from stationary storage tanks, cylinders and cargo tanks, including bobtail trucks, tanker or transport trucks and railroad tank cars, as well as into portable tanks and cylinders. Based on LPG low emission connector and low emission fixed liquid level gauge (FLLG) technologies that were available at the time of rule adoption, Rule 1177 was estimated to reduce VOC emissions by more than 70 percent upon full implementation. Table 4-57 summarizes key requirements.

**TABLE 4-57
KEY REQUIREMENTS OF SOUTH COAST AQMD RULE 1177**

| Rule Element | South Coast AQMD Rule 1177 – Liquefied Petroleum Gas Transfer and Dispensing (Adopted 6/1/12) |
|---------------|---|
| Applicability | Transfer of LPG from any cargo tank, stationary storage tank or cylinder into any other cargo tank, stationary storage tank, cylinder, or portable storage tank |
| Exemptions | <ul style="list-style-type: none"> • Transfer of LPG into any container with a water capacity of less than 4 gallons • Facilities that are subject to the requirements of Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants • LPG cylinders that are specifically dedicated for and installed for use with recreational vehicles |
| Requirements | <ul style="list-style-type: none"> • Require use of LPG low emission connectors to limit the discharge of LPG upon disconnection to four cubic centimeters or less by July 1, 2013 • Require use of LPG low emission connectors to limit discharge to four cubic centimeters or less by July 1, 2013 • Require all LPG-receiving containers to be filled using FLLG by July 1, 2017, or use an equivalent technique that complies with fire protection laws • Implement a Leak Detection and Repair program with routine leak checks using a bubble test and maintenance of vapor recovery systems • Require records of low emission FLLG and LPG connector installations, leak repairs, and maintenance of vapor recovery systems • Require annual reports for LPG facilities, including monthly purchase and dispensing volumes (2013-2015), year-end inventories (2013-2017), and connector installations (2013) |

The only comprehensive rule at other agencies pertaining to LPG transfer and dispensing is the VCAQMD Rule 74.33 – Liquefied Petroleum Gas Transfer or Dispensing (adopted January 13, 2015) which is based on South Coast AQMD Rule 1177 (adopted June 1, 2012). As Rule 74.33 is equivalent to Rule 1177, staff did not identify any control measure to be considered as a contingency measure for this source category.

In addition to Rule 1177, South Coast AQMD regulates this source category through Rule 1149 – Storage Tank and Pipeline Cleaning and Degassing. Table 4-58 contains a comparison of South Coast AQMD Rule 1149, SJVAPCD Rule 4623 – Storage of Organic Liquids, AVAQMD Rule 1149 – Storage Tank Cleaning and Degassing, and BAAQMD Rule 8-5 – Storage of Organic Liquids. South Coast AQMD, SJVAPCD, and BAAQMD rules are generally similar, although South Coast AQMD Rule 1149 and SJVAPCD Rule 4623 are more stringent by requiring that the VOC concentrations within the tank or pipeline be reduced to 5,000 ppm or less for cleaning and degassing operations. While AVAQMD Rule 1149 requires at least 90 percent efficiency for any control measure in reducing VOC emissions (as opposed to limiting VOC concentrations), staff have not found any indication that this requirement is more stringent than South Coast AQMD Rule 1149.

**TABLE 4-58
COMPARISON OF SOUTH COAST AQMD RULE 1149 WITH RULES AT OTHER AGENCIES**

| Rule Element | South Coast Rule 1149 – Storage Tank and Pipeline Cleaning and Degassing (Amended 5/2/08) | SJVAPCD Rule 4623 – Storage of Organic Liquids (Amended 06/15/23) | AVAQMD Rule 1149 – Storage Tank Cleaning and Degassing (Amended 07/14/95) | BAAQMD Rule 8-5 – Storage of Organic Liquids (Amended 11/3/21) |
|-----------------|---|--|--|--|
| Applicability | The purpose of this rule is to reduce VOC and toxics emissions from roof landings, cleaning, maintenance, testing, repair and removal of storage tanks and pipelines. This rule applies to the cleaning and degassing of a pipeline opened to atmosphere outside the boundaries of a facility, stationary tank, reservoir, or other container, storing or last used to store VOC | The purpose of this rule is to limit VOC emissions from the storage of organic liquids. This rule applies to any tank with a capacity of 1,100 gallons or greater in which any organic liquid is placed, held, or stored | This rule applies to the cleaning and degassing of a stationary tank, reservoir, or other container storing or last used to store Volatile Organic Compounds | The purpose of this rule is to limit emissions of organic compounds from storage tanks |
| Control Measure | <ul style="list-style-type: none"> For stationary tank, reservoir, or container the emissions are controlled by one of the following: (A) Liquid balancing; or (B) Other control techniques such that the gaseous VOC concentration within the tank, reservoir or other container is reduced to <5,000 ppm, measured as methane, for at least one hour after degassing operations have ceased | <ul style="list-style-type: none"> For Tank Degassing operations, organic vapors shall be minimized by exhaust VOC contained in the tank vapor space to a vapor recovery system until the organic vapor concentration is ≤5,000 ppm, or is ≤10% of the lower explosion limit (LEL), whichever is less | <ul style="list-style-type: none"> Above-ground stationary tank subject to this rule: during cleaning or degassing operations, emissions are controlled by: (A) Liquid balancing (B) Negative pressure displacement and subsequent incineration (C) A refrigerated condenser which reduces the vapor temperature to ≤100°F, | <ul style="list-style-type: none"> For tanks larger than 75 m³, the emissions of organic compounds resulting from degassing shall be controlled by an abatement device that collects and processes all organic vapors and gases and has an abatement efficiency of at least 90% by weight. The system shall be operated until the concentration of |

| Rule Element | South Coast Rule 1149 – Storage Tank and Pipeline Cleaning and Degassing (Amended 5/2/08) | SJVAPCD Rule 4623 – Storage of Organic Liquids (Amended 06/15/23) | AVAQMD Rule 1149 – Storage Tank Cleaning and Degassing (Amended 07/14/95) | BAAQMD Rule 8-5 – Storage of Organic Liquids (Amended 11/3/21) |
|--------------|--|--|---|--|
| | <ul style="list-style-type: none"> The roof of a floating storage tank containing or last containing a VOC liquid emissions are controlled by one of the following: (A) The vapor space created is vented to a control device approved by the Executive Officer; or (B) The gaseous VOC concentration within the tank, reservoir or other container is reduced to <5,000 ppm, measured as methane, for at least one hour after degassing operations have ceased For pipelines the emissions are controlled by one of the following: A) The gaseous VOC concentration within the pipeline is reduced to <5,000 ppm, measured as methane, for at least one hour after degassing operations have ceased; or B) The gaseous VOC concentration outside the pipeline, as measured pursuant to paragraph (d)(1) while the pipeline is open, is <5,000 ppm, measured as methane | <ul style="list-style-type: none"> During tank cleaning operations; 1) while performing tank cleaning activities, operators may use the following cleaning agents: diesel, solvents with an initial boiling point of >302°F, solvents with a vapor pressure of <0.5 psia, or solvents with 50 grams per liter VOC content or less. 2) Steam cleaning shall be allowed at locations where wastewater treatment facilities are limited or during the months of December through March | <p>and capable of handling the displaced vapors (D) Any other control method or control equipment that has been approved by the Executive Officer or designee to be at least 90% efficient in reducing VOC emissions</p> <ul style="list-style-type: none"> Underground Storage Tanks: A person shall not allow cleaning or degassing of any underground storage tanks subject to this rule unless the VOC emissions are controlled by a device that has been approved by the Executive Officer or designee to be at least 90% efficient | <p>organic compounds in the tank is <10,000 ppm expressed as methane. In order to satisfy this requirement, effective June 1, 2007, the residual organic concentration must be measured to be <10,000 ppm as methane for at least four consecutive measurements performed at intervals no shorter than 15 minutes each</p> <ul style="list-style-type: none"> Effective June 1, 2007, tank interior cleaning agents must meet the following requirements, unless all organic vapors and gases emitted during tank cleaning are collected and processed at an abatement device that has an abatement efficiency of at least 90% by weight. Agents used to clean tank interiors shall have an initial boiling point greater |

| Rule Element | South Coast Rule 1149 – Storage Tank and Pipeline Cleaning and Degassing (Amended 5/2/08) | SJVAPCD Rule 4623 – Storage of Organic Liquids (Amended 06/15/23) | AVAQMD Rule 1149 – Storage Tank Cleaning and Degassing (Amended 07/14/95) | BAAQMD Rule 8-5 – Storage of Organic Liquids (Amended 11/3/21) |
|--------------|--|---|---|---|
| | <ul style="list-style-type: none"> Vacuum trucks used to remove liquid, sludge or vapors from tanks or pipelines subject to this rule shall not exhaust vapors to the atmosphere >500 ppm, measured as methane | | | than 302°F, a true vapor pressure <0.5 psia, or a VOC content <50 g/L |

c. Conclusion

South Coast AQMD Rules 1149 and 1177 are the most stringent and staff did not identify any potential contingency measures for these rules.

4. Fuel Transfer and Dispensing Losses

a. Overview

Rule 461 – Gasoline Transfer and Dispensing was adopted in January 1976 and regulates stationary and mobile gasoline dispensing facilities that dispense into motor vehicles. Rule 461 controls VOC and toxic air contaminant emissions during the filling of storage tanks and when dispensing gasoline from both stationary gasoline dispensing facilities and mobile fuelers into motor vehicles. The primary toxic air contaminants associated with gasoline vapors are benzene, ethyl benzene, and naphthalene, which are carcinogens. Provisions for mobile fueler transfer and dispensing of gasoline have been included in Rule 461 since 1995 and rely on the same approach as stationary gasoline dispensing which requires use of Phase I and Phase II vapor recovery systems that are tested and certified by CARB. Although Rule 461 includes provisions for mobile fuelers that dispense fuel into motor vehicles, the variation of retail mobile fuelers was not envisioned when these provisions were established over 20 years ago. Rule 461.1 – Gasoline Transfer and Dispensing for Mobile Fueling Operations was adopted on January 7, 2022 to ensure that CARB certified vapor control systems are installed for retail mobile fuelers, to address the current status of CARB certified vapor recovery systems for mobile fuelers, to restrict operation near a school during school hours, and to establish other requirements for retail and non-retail mobile fuelers.

Fuel Transfer and Dispensing Losses account for 3.15 tpd of VOC and zero NOx emissions in 2037. The VOC emissions for this source category are attributed to gasoline wholesale facility point sources, fuel dispensing tanks – working/breathing losses, gasoline storage bulk plants/terminals, tank trucks/railcars, and underground storage tanks. This category is broken down to applicable sub-categories shown in Table 4-59.

**TABLE 4-59
FUEL TRANSFER AND DISPENSING LOSSES BASED ON 2037 SUMMER PLANNING
INVENTORY**

| Source Category | VOC (tpd) | NOx (tpd) |
|---|-------------|-------------|
| 330 – Underground Tanks | 0.03 | 0.00 |
| 366 – Tanker Loading | 0.00 | 0.00 |
| 368 – Barge Loading | 0.00 | 0.00 |
| 374 – Fuel Dispensing Tanks – Working Losses | 0.86 | 0.00 |
| 376 – Fuel Dispensing Tanks – Breathing Losses | 0.13 | 0.00 |
| 378 – Vehicle Refueling – Vapor Displacement Losses | 0.15 | 0.00 |
| 380 – Vehicle Refueling – Spillage | 1.22 | 0.00 |
| 381 – Vehicle Refueling – Hose Permeation | 0.07 | 0.00 |
| 382 – Bulk Plants/Terminals – Gasoline Storage – Breathing Losses | 0.00 | 0.00 |
| 384 – Bulk Plants/Terminals – Gasoline Storage – Working Losses | 0.12 | 0.00 |
| 390 – Tank Cars and Trucks – Working Losses | 0.19 | 0.00 |
| 392 – Tank Cars and Trucks – In-Transit Breathing Losses | 0.00 | 0.00 |
| 393 – Tank Trucks/Railcar Working Loss | 0.38 | 0.00 |
| 394 – Tanker/Barge – In-Transit Breathing Losses | 0.00 | 0.00 |
| Total | 3.15 | 0.00 |

b. Evaluation

Table 4-60 compares the South Coast AQMD Rules 461 and 461.1 with rules at other agencies including MDAQMD Rule 461 – Gasoline Transfer and Dispensing, AVAQMD Rule 461 – Gasoline Transfer and Dispensing, SJVAPCD Rule 4621 – Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants, and SJVAPCD Rule 4622 – Gasoline Transfer into Motor Vehicle Fuel Tanks. The analysis shows that South Coast AQMD’s rules are generally as stringent as or more stringent than other agencies. For example, the vapor recovery system requirements in Rules 461 and 461.1, which require the recovery of 98 percent (Phase I) and 95 percent (Phase II) of displaced gasoline vapors, are the most stringent. The technologies to drain spillage for underground tanks is gravity-based in AVAQMD and MDAQMD while South Coast AQMD requires a spill box equipped with integral drain valve. While they are different, they both emphasize no spillage and are likely equivalent.

Additionally, pertaining to emissions from Gasoline Dispensing Tanks, Table 4-61 shows the comparison between South Coast AQMD’s Rule 462 – Organic Liquid Loading, with AVAQMD Rule 462, BAAQMD Rule 8-33, and MDAQMD Rule 462. For a subcategory of applicable sources (Class B facilities), South Coast AQMD Rule 462 is potentially not as stringent as MDAQMD Rule 462. Class B facilities are required to be equipped with CARB certified vapor recovery devices or, in the absence of CARB certification, a device approved by South Coast AQMD that is designed to recover at least 90 percent of vapors. MDAQMD Rule

462 requires a 95 percent vapor recovery efficiency. However, South Coast AQMD's compliance records indicate that the actual control efficiency exceeds 95 percent. Therefore, there would be no emission reductions associated with increasing the minimum control efficiency in Rule 462 from 90 to 95 percent.

For vapor recovery systems used at gasoline bulk loading terminals, BAAQMD Rule 8-33 requires a vapor recovery system to emit no more than 0.04 pounds of VOC per 1,000 gallons of organic liquid loaded at gasoline bulk terminals. In comparison, the limit in South Coast AQMD Rule 462 is 0.08 pounds per 1,000 gallons of liquid loaded for facilities loading 20,000 gallons or more on any one day. While Rule 462 differentiates requirements by facility throughput, BAAQMD Rule 8-33 does not. The vapor recovery technology needed to demonstrate compliance with BAAQMD Rule 8-33 exists and this measure is therefore technologically feasible. However, reducing the emission rate from 0.08 to 0.04 pounds per 1,000 gallons could cost between \$100,000 for minor modifications to the vapor recovery control device and several millions of dollars for major modifications (e.g., replacing the control device). Based on staff's evaluation, the cost-effectiveness is estimated to be between \$110,000 and \$250,000 per ton of VOC reduced.⁵⁴ Therefore, lowering the VOC emission limit as a contingency measure is not economically feasible. In addition, facilities would likely require more than two years to implement modifications to control devices to achieve the lower limit.

As of January 2025, South Coast AQMD is in the process of amending Rule 462. The rule amendment is expected to further enhance the stringency by requiring OGI inspections and lowering VOC leak detection thresholds.⁵⁵ Therefore, no further opportunity to reduce emissions through a contingency measure exists in this category.

⁵⁴ Detailed evaluation can be found in the 2022 AQMP, Appendix VI-A: RACM Demonstration, p. VI-A-54. <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/appendix-vi.pdf?sfvrsn=12>

⁵⁵ South Coast AQMD, Proposed Amended Rule 462 – Organic Liquid Loading. <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-462>

**TABLE 4-60
COMPARISON OF SOUTH COAST AQMD RULES 461 AND 461.1 WITH RULES AT OTHER AGENCIES**

| Rule Element | South Coast AQMD Rule 461 – Gasoline Transfer and Dispensing (Amended 1/7/22) | South Coast AQMD Rule 461.1 – Gasoline Transfer and Dispensing for Mobile Fueling Operations (Adopted 1/7/22) | AVAQMD 461 – Gasoline Transfer and Dispensing (Amended 10/21/08) | MDAQMD 461 – Gasoline Transfer and Dispensing (Amended 1/22/18) | SJVAPCD Rule 4621 – Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants (Amended 12/19/13) | SJVAPCD Rule 4622 – Gasoline Transfer into Motor Vehicle Fuel Tanks (Amended 12/19/13) |
|--|---|---|--|---|--|---|
| Applicability | Transfer of gasoline from any tank truck, trailer, or railroad tank car into any stationary storage tank, and from any stationary storage tank into any motor vehicle fuel tank | Retail and nonretail mobile fuelers that are transferring or dispensing gasoline | Transfer of gasoline from any tank truck, trailer, or railroad tank car into any stationary storage tank or mobile fueler, and from any stationary storage tank or mobile fueler into any mobile fueler or motor vehicle fuel tank | Transfer of Gasoline from any tank truck, or railroad tank car into any stationary storage tank or mobile fueler, and from any stationary storage tank or mobile fueler into any mobile fueler or motor vehicle fuel tank | This rule applies to any tank with a capacity of $\geq 1,100$ gallons in which any organic liquid is placed, held, or stored | This rule applies to any gasoline storage and dispensing operation or mobile fueler from which gasoline is transferred into motor vehicle fuel tanks, except as provided in Section 4.0 of the rule |
| Phase I: Gasoline Transfer into Stationary Storage Tanks and | <ul style="list-style-type: none"> Underground storage tanks: 1) are equipped with a “CARB certified” enhanced vapor recovery | <ul style="list-style-type: none"> The Tank is equipped with CARB certified phase I vapor recovery system for mobile fuelers | <ul style="list-style-type: none"> Stationary storage tank or mobile fueler tank is equipped with a CARB certified vapor | <ul style="list-style-type: none"> The tank is equipped with a CARB certified vapor recovery system capable of recovering or | <ul style="list-style-type: none"> Containers used for aviation gasoline are equipped with a Phase I vapor recovery | From SJVAPCD Rule 4621: <ul style="list-style-type: none"> Containers used for aviation gasoline must be equipped |

| Rule Element | South Coast AQMD Rule 461 – Gasoline Transfer and Dispensing (Amended 1/7/22) | South Coast AQMD Rule 461.1 – Gasoline Transfer and Dispensing for Mobile Fueling Operations (Adopted 1/7/22) | AVAQMD 461 – Gasoline Transfer and Dispensing (Amended 10/21/08) | MDAQMD 461 – Gasoline Transfer and Dispensing (Amended 1/22/18) | SJVAPCD Rule 4621 – Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants (Amended 12/19/13) | SJVAPCD Rule 4622 – Gasoline Transfer into Motor Vehicle Fuel Tanks (Amended 12/19/13) |
|----------------|---|---|--|---|--|---|
| Mobile Fuelers | <p>system having a minimum volumetric efficiency of 98% and an emission factor not exceeding 0.15 lb/1,000 gallons. 2) A “CARB certified” spill box shall be installed and equipped with an integral drain valve or other devices (CARB certified) to return spilled gasoline to the underground stationary storage tank.</p> | <p>certified pursuant to CARB’s CP204, certification procedures for vapor recovery systems of cargo tanks</p> | <p>recovery system, which is maintained and operated according to the manufacturer’s specifications</p> <ul style="list-style-type: none"> Underground tank lines are gravity drained, and above-ground tanks are equipped with dry breaks, or as approved by the District, such that upon line disconnect the liquid leak rate does not exceed three | <p>processing 98-98% of the displaced Gasoline Vapors</p> <ul style="list-style-type: none"> The Mobile Fueler is equipped with a CARB certified vapor recovery system capable of recovering or processing 95% of the displaced gasoline vapors Underground tank lines shall be gravity drained; in such a manner that upon disconnect no | <p>system that is certified to meet a minimum volumetric control of 95%</p> <ul style="list-style-type: none"> For an underground storage container that contains gasoline and is not located at a bulk plant, the container shall be equipped with an CARB certified Phase I vapor recovery system that is certified to have a minimum | <p>with a Phase I vapor recovery system that is certified to meet a minimum volumetric control of 95%</p> <ul style="list-style-type: none"> For an underground storage container that contains gasoline and is not located at a bulk plant, the container shall be equipped with an CARB certified Phase I vapor recovery system that is certified to |

| Rule Element | South Coast AQMD Rule 461 – Gasoline Transfer and Dispensing (Amended 1/7/22) | South Coast AQMD Rule 461.1 – Gasoline Transfer and Dispensing for Mobile Fueling Operations (Adopted 1/7/22) | AVAQMD 461 – Gasoline Transfer and Dispensing (Amended 10/21/08) | MDAQMD 461 – Gasoline Transfer and Dispensing (Amended 1/22/18) | SJVAPCD Rule 4621 – Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants (Amended 12/19/13) | SJVAPCD Rule 4622 – Gasoline Transfer into Motor Vehicle Fuel Tanks (Amended 12/19/13) |
|--------------|--|---|--|---|--|--|
| | <ul style="list-style-type: none"> Aboveground storage tanks are equipped with a “CARB certified” vapor recovery system having a minimum volumetric efficiency of 95% | | drops per minute | liquid spillage would occur. <ul style="list-style-type: none"> Aboveground storage tanks shall be equipped with Dry Breaks, such that liquid spillage upon disconnect shall not exceed 10 milliliters | volumetric control efficiency of 98% (but 95% for aviation gasoline) <ul style="list-style-type: none"> All aboveground storage containers that contain gasoline shall be equipped with an CARB certified pressure vacuum relief valve set 3.0±0.5 inches water column pressure relief and 8.0±2.0 inches water | have a minimum volumetric control efficiency of 98% (but 95% for aviation gasoline) <ul style="list-style-type: none"> All aboveground storage containers that contain gasoline shall be equipped with an CARB certified pressure vacuum relief valve set 3.0±0.5 inches water column pressure relief and 8.0±2.0 |

| Rule Element | South Coast AQMD Rule 461 – Gasoline Transfer and Dispensing (Amended 1/7/22) | South Coast AQMD Rule 461.1 – Gasoline Transfer and Dispensing for Mobile Fueling Operations (Adopted 1/7/22) | AVAQMD 461 – Gasoline Transfer and Dispensing (Amended 10/21/08) | MDAQMD 461 – Gasoline Transfer and Dispensing (Amended 1/22/18) | SJVAPCD Rule 4621 – Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants (Amended 12/19/13) | SJVAPCD Rule 4622 – Gasoline Transfer into Motor Vehicle Fuel Tanks (Amended 12/19/13) |
|--|--|---|--|--|--|---|
| | | | | | column vacuum relief <ul style="list-style-type: none"> All aboveground storage containers that contain aviation gasoline shall be equipped with pressure relief valves set at 8 ounces per square inch | inches water column vacuum relief <ul style="list-style-type: none"> All aboveground storage containers that contain aviation gasoline shall be equipped with pressure relief valves set at eight (8) ounces per square inch |
| Phase II – Gasoline Transfer into Vehicle Fuel Trucks* | <ul style="list-style-type: none"> The dispensing unit used to transfer the gasoline from the stationary storage tank to the motor vehicle fuel tank is | Each Mobile Fueler Cargo Tank, excluding one individual portable fuel container with a capacity up to 6.6 gallons of gasoline, is equipped with a | <ul style="list-style-type: none"> The dispensing unit is equipped with a “CARB Certified” Vapor Recovery System operated and maintained in a | <ul style="list-style-type: none"> The dispensing unit is equipped with a CARB Certified Vapor Recovery System capable of recovering 95 percent | | <ul style="list-style-type: none"> Gasoline dispensing unit used to transfer the gasoline is equipped with and has in operation an CARB certified Phase II vapor |

| Rule Element | South Coast AQMD Rule 461 – Gasoline Transfer and Dispensing (Amended 1/7/22) | South Coast AQMD Rule 461.1 – Gasoline Transfer and Dispensing for Mobile Fueling Operations (Adopted 1/7/22) | AVAQMD 461 – Gasoline Transfer and Dispensing (Amended 10/21/08) | MDAQMD 461 – Gasoline Transfer and Dispensing (Amended 1/22/18) | SJVAPCD Rule 4621 – Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants (Amended 12/19/13) | SJVAPCD Rule 4622 – Gasoline Transfer into Motor Vehicle Fuel Tanks (Amended 12/19/13) |
|--------------|---|--|---|---|--|--|
| | <p>equipped with a “CARB certified” vapor recovery system as capable of recovering or processing displaced gasoline vapors by at least 95%, or having an emission factor not exceeding 0.38 pounds per 1,000 gallons, as applicable;</p> <ul style="list-style-type: none"> All liquid removal devices installed for any gasoline dispensing | <p>CARB Certified Phase II Vapor Recovery System certified pursuant to CARB’s CP-205, Certification Procedure for Vapor Recovery Systems of Novel Facilities, using TP-205.2, Test Procedure for Determination of Efficiency of Phase II Vapor Recovery of Novel Facilities, to be capable of recovering or processing displaced Gasoline Vapors by at least 95%, or having an</p> | <p>Vapor-tight and Liquid-tight manner in accordance with the manufacturer’s specifications and the applicable CARB certification</p> <ul style="list-style-type: none"> All Liquid Removal Devices installed for any Gasoline dispensing nozzle with a dispensing rate of greater than five gallons per minute shall be “CARB Certified” with | <p>(95%) of the displaced Gasoline Vapors, or having an emission factor not exceeding 0.38 pounds per 1,000 gallons</p> <ul style="list-style-type: none"> All Liquid Removal devices installed for any Gasoline dispensing nozzle with a dispensing rate of greater than five gallons per minute shall be CARB Certified with a minimum | | <p>recovery system</p> |

| Rule Element | South Coast AQMD Rule 461 – Gasoline Transfer and Dispensing (Amended 1/7/22) | South Coast AQMD Rule 461.1 – Gasoline Transfer and Dispensing for Mobile Fueling Operations (Adopted 1/7/22) | AVAQMD 461 – Gasoline Transfer and Dispensing (Amended 10/21/08) | MDAQMD 461 – Gasoline Transfer and Dispensing (Amended 1/22/18) | SJVAPCD Rule 4621 – Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants (Amended 12/19/13) | SJVAPCD Rule 4622 – Gasoline Transfer into Motor Vehicle Fuel Tanks (Amended 12/19/13) |
|--------------|---|---|--|---|--|--|
| | nozzle with a dispensing rate of greater than five gallons per minute shall be “CARB certified” with a minimum liquid removal rate of five milliliters per gallon transferred | emission factor not exceeding 0.38 pounds per 1,000 gallons, as applicable | a minimum liquid removal rate of five milliliters per gallon transferred | Liquid Removal rate of five milliliters per gallon transferred | | |

**TABLE 4-61
COMPARISON OF SOUTH COAST AQMD RULE 462 WITH RULES AT OTHER AGENCIES**

| Rule Element | South Coast AQMD Rule 462 – Organic Liquid Loading (Amended 5/14/99) | AVAQMD Rule 462 – Organic Liquid Loading (Amended 9/19/17) | BAAQMD Rule 8-33 – Gasoline Bulk Terminals and Gasoline Cargo Tanks (Amended 11/3/21) | MDAQMD Rule 462 – Organic Liquid Loading (Amended 1/22/18) |
|------------------|--|--|---|--|
| Applicability | Facilities that load organic liquids with a vapor pressure of 1.5 psia (77.5 mmHg) or greater under actual loading conditions into any tank truck, trailer, or railroad tank car. The provisions of this rule shall apply to all the organic liquid loading facilities that are defined as Class A, B or C facilities | Same as South Coast AQMD Rule 462 | To limit emissions of organic compounds associated with gasoline transfer operations at gasoline bulk terminals and organic compounds from gasoline cargo tanks | To control emissions of VOC and toxic compounds from facilities that transport and load organic liquids into tanks, including Motor Vehicle fuel tanks, tank trucks, trailers or railroad tank cars. (2) Applicability: (a) The provisions of this rule shall apply to all Class “A” or “B” Facilities, Retail and non-retail service stations or any other facility where Organic Liquids are stored or transferred |
| Class Definition | <ul style="list-style-type: none"> • Class "A" Facility – Any facility which loads 20,000 gallons (75,700 liters) or more on any one day of organic liquids into any tank truck, trailer, or railroad tank car • Class "B" Facility – Any facility: <ol style="list-style-type: none"> 1) which was constructed before January 9, 1976 and | Same as South Coast AQMD Rule 462 | N/A | <ul style="list-style-type: none"> • Class “A” Facility – Any Organic Liquid Loading Facility loading 5,000,000 gallons (18,925,000 liters) or more per year and/or 20,000 gallons (73,700 liters) or more on any day of Organic Liquids with a True Vapor Pressure, determined at actual storage conditions, of 77.5 |

| Rule Element | South Coast AQMD Rule 462 – Organic Liquid Loading (Amended 5/14/99) | AVAQMD Rule 462 – Organic Liquid Loading (Amended 9/19/17) | BAAQMD Rule 8-33 – Gasoline Bulk Terminals and Gasoline Cargo Tanks (Amended 11/3/21) | MDAQMD Rule 462 – Organic Liquid Loading (Amended 1/22/18) |
|--------------|--|--|---|--|
| | <p>loads more than 4,000 gallons (15,140 liters) but not more than 20,000 gallons (75,700 liters) of gasoline on any one day; Or loads not more than 4,000 gallons of gasoline on any one day, but more than 500,000 gallons of gasoline in any one calendar year, into any tank truck, trailer, or railroad tank car</p> <p>2) which was constructed after January 9, 1976 and loads not more than 20,000 gallons (75,700 liters) of gasoline on any one day into a tank truck, trailer or railroad tank car</p> <ul style="list-style-type: none"> Class "C" Facility- Any facility existing before January 9, 1976 which loads not more than 4,000 gallons (15,140 liters) of gasoline on any one day and not more than 500,000 gallons in any one calendar year, into any tank truck, trailer, or railroad tank car | | | <p>mmHg (1.5 psia) or greater into any tank truck, trailer, or railroad tank car</p> <ul style="list-style-type: none"> Class "B" Facility – Any Organic Liquid Loading Facility loading less than 5,000,000 gallons (18,925,000 liters) per year, with a True Vapor Pressure, determined at actual storage conditions, of 77.5 mmHg (1.5 psia) or greater into any tank truck, trailer, or railroad tank car |

| Rule Element | South Coast AQMD Rule 462 – Organic Liquid Loading (Amended 5/14/99) | AVAQMD Rule 462 – Organic Liquid Loading (Amended 9/19/17) | BAAQMD Rule 8-33 – Gasoline Bulk Terminals and Gasoline Cargo Tanks (Amended 11/3/21) | MDAQMD Rule 462 – Organic Liquid Loading (Amended 1/22/18) |
|----------------------|--|--|--|---|
| Loading Requirements | <ul style="list-style-type: none"> At Class A Facilities: Each vapor recovery and/or disposal system shall reduce the emissions of VOC to ≤ 0.08 lb/1,000 gal (10 g/1,000 L) of organic liquid transferred. The backpressure in the vapor recovery and/or disposal system shall not exceed 18 inches of water column pressure At Class B Facilities: Vapor recovery and/or disposal system shall be designed and operated to recover at least 90% of the displaced vapors. The backpressure in the vapor recovery system shall not exceed 18 inches of water column pressure | <ul style="list-style-type: none"> At Class A Facilities: From June 9, 1995 until January 31, 1998, each system shall reduce the emissions of VOC to ≤ 0.29 lb/1,000 gal (35 g/1,000 L) of organic liquid transferred. Effective February 1, 1998, each system shall reduce the emissions of VOC to ≤ 0.08 lb/1,000 gal (10 g/1,000 L) of organic liquid transferred At Class B Facilities: Vapor recovery and/or disposal system shall be designed and operated to recover at least 90% of the displaced vapors. The backpressure in the vapor recovery system shall not exceed 18 inches of water pressure | <ul style="list-style-type: none"> Effective 1/10/21, emissions of non-methane organic compounds from a vapor recovery system shall not exceed 0.04 lb/1,000 gal of organic liquid loaded | <ul style="list-style-type: none"> At Class A Facilities: Each Vapor Recovery and/or disposal system shall reduce the emissions of VOC to ≤ 0.08 lb/1,000 gal (10 g/1,000 L) of organic liquid transferred. The backpressure in the Vapor Recovery and/or disposal system shall not exceed 18 inches of water column pressure At Class B Facilities: Equipped with a vapor Recovery and/or disposal system with a Vapor Recovery Efficiency of 95% <ol style="list-style-type: none"> The backpressure in the Vapor Recovery and/or disposal system shall not exceed 18 inches of water column pressure Each class B facility should be equipped with a pressure vacuum valve on the aboveground stationary storage tank with a minimum pressure valve setting of eight 8 ounces |

| Rule Element | South Coast AQMD Rule 462 – Organic Liquid Loading (Amended 5/14/99) | AVAQMD Rule 462 – Organic Liquid Loading (Amended 9/19/17) | BAAQMD Rule 8-33 – Gasoline Bulk Terminals and Gasoline Cargo Tanks (Amended 11/3/21) | MDAQMD Rule 462 – Organic Liquid Loading (Amended 1/22/18) |
|--------------|--|--|---|--|
| | | | | per square inch, provided that such setting will not exceed the tank’s maximum pressure rating. This requirement does not pertain to Floating Roof Tanks |

c. Conclusion

Evaluation of rules for gasoline dispensing tanks revealed that South Coast AQMD’s rules are generally the most stringent. Staff did not identify any potential contingency measures that can achieve quantifiable reductions within two years.

5. Miscellaneous/Other Fugitive Losses

a. Overview

Miscellaneous/Other Fugitive Losses account for 1.54 tpd of VOC and 0.02 tpd of NOx emissions in 2037. The emissions inventory does not provide sufficient detail to elucidate the specific processes contributing emissions. As such, multiple South Coast AQMD rules may apply to this source category, including Rules 461, 461.1, 462, 463, 464, 465, 466, 466.1, 467, 1123, 1149, 1173, 1176, 1177, 1178, 1180, 1180.1, and 1189.

b. Evaluation

Several rules have already been evaluated under different source categories in this document. For example, Rules 1173 and 1176 are evaluated under the Refining Process Fugitive Losses category; Rules 463 and 1178 are evaluated under the Storage Tanks and Related Losses category; Rules 1149 and 1177 are evaluated under Gas Transmission and Dispensing Losses category; and Rules 461, 461.1, and 462 are evaluated under the Fuel Transfer and Dispensing Losses category. The remaining rules are briefly summarized in Table 4-62.

**TABLE 4-62
SUMMARY OF SOUTH COAST AQMD RULES 464, 465, 466, 466.1, 467, 1123, AND 1189**

| Rule | Key Requirements |
|---|--|
| Rule 464 – Wastewater Separators (Amended 12/7/90) | <ul style="list-style-type: none"> • Vessels and devices used to recover oil or tar from effluent water must be equipped with: <ul style="list-style-type: none"> ○ a solid cover with all openings sealed and totally enclosing the liquid contents of the compartment; or ○ a floating pontoon or double-deck type cover with no seal gaps greater than 1/8 inch for an accumulative length of 97 percent of the perimeter of the compartment and no gap exceeding ½ inch. • Gauging and sampling devices as well as forebays must be covered |
| Rule 465 – Refinery Vacuum-Producing Devices or Systems (Amended 8/13/99) | <ul style="list-style-type: none"> • Hot wells and accumulators shall be equipped with covers • Exhaust gases from vacuum-producing devices or systems, including hot wells and accumulators, shall be continuously collected and added to a fuel gas system or combustion device |
| Rule 466 – Pumps and Compressors (Amended 10/7/83) | <ul style="list-style-type: none"> • Pumps and compressors must be equipped with seals such that none of the below conditions exist: <ul style="list-style-type: none"> ○ Leakage of more than three drops per minute |

| Rule | Key Requirements |
|---|--|
| | <ul style="list-style-type: none"> ○ Visible mist ○ Visible indication of leakage ● Pumps and compressors found to leak VOC in excess of 10,000 ppm must be repaired |
| Rule 466.1 – Valves and Flanges (Amended 3/16/84) | <ul style="list-style-type: none"> ● No leakage of greater than three drops per minute or a visible mist ● Valves and flanges with a VOC concentration of 10,000 ppm measured 1 centimeter from the source must be repaired and regularly inspected |
| Rule 467 – Pressure Relief Devices (Amended 3/5/82) | <ul style="list-style-type: none"> ● PRDs at refineries and chemical plants must be vented to a vapor recovery system or inspected and maintained ● PRDs must be inspected regularly and, if a leak is identified, repaired within 15 days or at the next scheduled turnaround if the PRD cannot be isolated without shutting down the process unit |
| Rule 1123 – Refinery Process Turnarounds (Amended 12/7/90) | Vessels containing VOC cannot be depressurized unless the vapors are collected and contained for use as fuel or sent to a gas disposal system until the pressure in the vessel is below five pounds per square inch, gauge, or is within ten percent above the minimum gauge pressure at which the vapors can be collected, whichever is lower |
| Rule 1180 – Fenceline and Community Air Monitoring for Petroleum Refineries and Related Facilities (Amended 1/5/24) | <ul style="list-style-type: none"> ● Conduct fenceline monitoring at refineries and related facilities for various pollutants including NO_x, VOC, and Toxic Air Contaminants and make the data available through a web-based interface ● Initiate a Specific Cause Analysis when pollutants are measured above specified thresholds. If the cause is determined to be from an on-site source, initiate corrective action to stop the exceedance within 24 hours |
| Rule 1180.1 – Fenceline and Community Air Monitoring for Other Refineries (Adopted 1/5/24) | <ul style="list-style-type: none"> ● Conduct fenceline monitoring at smaller refineries for various pollutants including NO_x, VOC, and Toxic Air Contaminants and make the data available through a web-based interface ● Initiate a Specific Cause Analysis when pollutants are measured above specified thresholds. If the cause is determined to be from an on-site source, initiate corrective action to stop the exceedance within 24 hours |
| Rule 1189 – Emission from Hydrogen Plant Process Vents (Adopted 1/21/00) | <ul style="list-style-type: none"> ● All hydrogen process plants must limit total VOC emissions from all process vents combined to 2.5 pounds of VOC per million standard cubic feet of hydrogen produced ● New or reconstructed plants are required to comply with an emission limit for all process vents combined of 0.5 pounds of VOC per million standard cubic feet of hydrogen produced |

Many of the Regulation IV rules were amended decades ago and have been superseded by source-specific rules with more stringent requirements. For example, Rules 466, 466.1, and 467 were superseded by Rule

1173, which applies to more components at a larger universe of facilities.⁵⁶ Similarly, Rule 464 was supplanted by the more stringent Rule 1176. As previously mentioned, Rules 1173 and 1176 are evaluated elsewhere in this document. Therefore, staff did not evaluate many of the Regulation IV rules as the source-specific rules have already been demonstrated to have the most stringent requirements.

However, Rule 465 contains no analogous source-specific rule and it is therefore evaluated in this section. The purpose of Rule 465 is to control VOC emissions from petroleum refinery vacuum producing devices or systems, including hot wells and accumulators. Rule 465 is compared with SJVAPCD Rule 4453, VCAPCD Rules 67 and 74.8, and BAAQMD Rule 8-9 in Table 4-63. Other agencies' rules require that hot wells and accumulators must be closed with covers and that VOC vapors from vacuum producing devices must be controlled and piped to a combustion device with at least 90 percent control efficiency. The venting of VOC vapors from vacuum producing devices to the fuel gas system prior to incineration reflect the industry's existing practices. South Coast AQMD-approved combustion devices such as heaters or furnaces used at refineries achieve a VOC emission control efficiency greater than 90 percent. Therefore, Rule 465 is at least as stringent as analogous rules at other agencies.

⁵⁶ South Coast AQMD, Proposed Amended Rule 1173 Final Staff Report, p. 1-4.
<http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2024/2024-Nov1-022.pdf?sfvrsn=6>

**TABLE 4-63
SOUTH COAST AQMD RULE 465 COMPARATIVE ANALYSIS**

| Rule Element | South Coast AQMD Rule 465 – Refinery Vacuum-Producing Devices or Systems (Amended 8/13/99) | BAAQMD Rule 8-9 – Vacuum Producing Systems (Amended 11/3/21) | VCAPCD Rule 67 – Vacuum Producing Devices (Amended 7/5/83) and Rule 74.8 – Refinery Vacuum Producing Systems, Wastewater Separators and Process Turnarounds (Amended 7/5/83) | SJVAPCD Rule 4453 – Refinery Vacuum Producing Devices or Systems (Amended 12/17/92) |
|---------------|---|---|--|---|
| Applicability | All VOC emissions and sulfur compound emissions from any petroleum refinery vacuum-producing devices or systems, including hot wells and accumulator | Vacuum producing systems include, but are not limited to, steam ejectors with contact (barometric) condensers, steam ejectors with surface condensers, and mechanical vacuum pumps | Any vacuum producing devices or systems including hot wells and accumulators | Any vacuum producing device or system, including hot wells and accumulators installed in a refinery operation |
| Requirements | <ul style="list-style-type: none"> • Hot wells and accumulators shall be equipped with covers • Exhaust gases from vacuum-producing devices or systems, including hot wells and accumulators, shall be continuously collected and added to a fuel gas system or combustion device | <ul style="list-style-type: none"> • Non-Condensable precursor organic emissions from vacuum producing systems must either be controlled and piped to an appropriate firebox or incinerator for combustion, or be collected, compressed, and added to the fuel gas system, or be contained and treated so as to prevent their emission into the atmosphere • Hot wells and/or accumulators associated | <p><u>Rule 67</u> A person shall not discharge into the atmosphere more than 3 pounds of reactive organic compounds (ROC) in any one hour from any vacuum producing devices or systems including hot wells and accumulators, unless said discharge has been reduced by at least 90%</p> <p><u>Rule 74.8</u></p> <ul style="list-style-type: none"> • A person shall not use any vacuum producing system at a petroleum refinery | <ul style="list-style-type: none"> • Hot wells and accumulators shall be covered • Vapors shall be: <ul style="list-style-type: none"> ○ Collected, compressed, and added to refinery gas ○ Controlled and combusted in an appropriate firebox or incinerator with at least 90% VOC control efficiency |

| Rule Element | South Coast AQMD Rule 465 – Refinery Vacuum-Producing Devices or Systems (Amended 8/13/99) | BAAQMD Rule 8-9 – Vacuum Producing Systems (Amended 11/3/21) | VCAPCD Rule 67 – Vacuum Producing Devices (Amended 7/5/83) and Rule 74.8 – Refinery Vacuum Producing Systems, Wastewater Separators and Process Turnarounds (Amended 7/5/83) | SJVAPCD Rule 4453 – Refinery Vacuum Producing Devices or Systems (Amended 12/17/92) |
|--------------|--|---|---|---|
| | | <p>with vacuum system condensers must be covered and the precursor organic vapors must either be incinerated or contained and treated so as to prevent their emission into the atmosphere</p> | <p>for handling ROCs unless all ROCs are prevented from entering the atmosphere</p> <ul style="list-style-type: none"> • Pipe all uncondensed ROC vapors to a firebox, a flare, or adding said vapors to refinery fuel gas or feedstock; or • Control uncondensed ROC vapors by approved method | |

The sections below evaluate the remaining source-specific rules applicable to the Miscellaneous/Other Fugitive Losses category.

Refinery Process Turnarounds

Rule 1123 applies to vessels at refineries in which materials are processed or treated. It reduces VOC emissions by requiring that the vapors be captured when the vessel is depressurized during process turnarounds. Comparable rules in other districts include BAAQMD Rule 8-10 and SJVAPCD Rule 4454. Table 4-64 summarizes the comparison of applicable requirements in each rule.

**TABLE 4-64
SOUTH COAST AQMD RULE 1123 COMPARATIVE ANALYSIS**

| | South Coast AQMD Rule 1123 – Refinery Process Turnarounds (Amended 12/7/90) | BAAQMD Rule 8-10 – Process Vessel Depressurization (Amended 11/3/21) | SJVAPCD Rule 4454 – Refinery Process Unit Turnaround (Amended 12/17/92) |
|------------------------|--|--|--|
| Applicability | Any container or structural envelope at a refinery in which materials are processed or treated | Process vessels at refineries and chemical plants | Any refinery vessel containing VOC |
| Exemptions | None | <ul style="list-style-type: none"> Vessels subject to Rules 8-5, 8-24, 8-35, 8-36, 8-41, 8-50, and 8-52 Any process vessel with a volume of less than 100 cubic feet Any process vessel used in a batch process operation that requires periodic vessel opening as part of routine operation of the vessel, including but not limited to delayed coking vessels | <ul style="list-style-type: none"> Process vessels that have been depressurized to less than 5 psig |
| Operating Requirements | <ul style="list-style-type: none"> Process vessels cannot depressurize any vessel containing VOC unless the vapors are collected and contained for use as fuel or sent to a gas disposal system until the pressure in the | <ul style="list-style-type: none"> Process vessels cannot be vented to the atmosphere unless: <ul style="list-style-type: none"> Total organic compounds have been reduced to less than 10,000 ppm, expressed as methane; or | <ul style="list-style-type: none"> All process vessels shall be depressurized to less than 5 psig before venting/opening to atmosphere VOC released during depressurization must be: |

| | South Coast AQMD Rule 1123 – Refinery Process Turnarounds (Amended 12/7/90) | BAAQMD Rule 8-10 – Process Vessel Depressurization (Amended 11/3/21) | SJVAPCD Rule 4454 – Refinery Process Unit Turnaround (Amended 12/17/92) |
|--|--|--|---|
| | vessel is below 5 psig, or is within ten percent above the minimum gauge pressure at which the vapors can be collected, whichever is lower | <ul style="list-style-type: none"> • The total number of vessels vented above 10,000 ppm during any consecutive five-year period does not exceed 10% of the total process vessel population, and the organic compound emissions from the opening of these vessels shall not exceed 15 pounds per day • Emissions of VOC from depressurizing any process vessel at a refinery or a chemical plant shall be controlled by venting them to a fuel gas system, firebox, incinerator, thermal oxidizer, flare, or otherwise preventing their emissions to the atmosphere until the pressure is less than 4.6 psig | <ul style="list-style-type: none"> • Recovered; or • Controlled or incinerated for combustion; or • Flared |

The requirements in other districts’ rules are generally similar to those in Rule 1123. However, BAAQMD Rule 8-10 has additional provisions that address methane concentrations in process vessels. While these measures reduce methane emissions, it is uncertain whether they would result in greater reductions in VOC emissions than those achieved under Rule 1123. Therefore, staff concludes that Rule 1123 is as stringent as other districts’ rules.

Fenceline Monitoring

Both Rules 1180 and 1180.1 require the measurement of ambient concentrations of NOx, VOC, and toxic air contaminants at or near the boundaries of refineries by establishing real-time fenceline air monitoring systems. Importantly, these rules require the operator to initiate a Specific Cause Analysis if NOx or VOC

are detected above specified thresholds. If the exceedance is attributable to an on-site source, the corrective actions that the operator takes to eliminate the exceedance result in emission reductions.

Staff reviewed similar rules in other districts, including BAAQMD Rule 12-15 and SJVAPCD Rule 4460, both of which require fence-line monitoring at refineries. Unlike Rules 1180 and 1180.1, BAAQMD Rule 12-15 does not specify pollutant thresholds or require operators to investigate the sources of high pollutant levels. In contrast, SJVAPCD Rule 4460 shares more similarities with Rules 1180 and 1180.1, though it only mandates refinery operators to submit a written report on exceedances and outline corrective actions taken. This is in contrast to Rules 1180 and 1180.1, which require operators to conduct repairs if the exceedance is linked to an on-site source. Additionally, unlike Rules 1180 and 1180.1, SJVAPCD Rule 4460 does not require monitoring of total VOC and NOx. Based on these differences, staff concludes that Rules 1180 and 1180.1 establish the most stringent fence-line monitoring requirements for refineries.

Hydrogen Plants

South Coast AQMD Rule 1189 applies to hydrogen plants. Hydrogen plants may also be subject to other South Coast AQMD rules (e.g. Rule 1109.1, Rule 1180, etc.) which are evaluated elsewhere in this document. The evaluation in this section is specifically focused on VOC emissions from process vents at hydrogen plants.

Staff compared the requirements of Rule 1189 with BAAQMD Rule 13-5. Table 4-65 summarizes the comparison of applicable requirements in each rule.

**TABLE 4-65
SOUTH COAST AQMD RULE 1189 COMPARATIVE ANALYSIS**

| Rule Element | South Coast AQMD Rule 1189 – Emission from Hydrogen Plant Process Vents (Adopted 1/21/00) | BAAQMD Rule 13-5 – Industrial Hydrogen Plants (Adopted 5/4/22) |
|---------------|---|--|
| Applicability | All hydrogen plants that produce any hydrogen for use in petroleum refining operations | Industrial hydrogen plants including third parties |
| Exemptions | None | <ul style="list-style-type: none"> • Specific operations of methane and/or organic compound emissions already subject to methane and/or organic compound emission requirements in Regulation 8 • Deaerator vents and carbon dioxide scrubbing vents • Industrial hydrogen plants that have a maximum design production capacity that is less than 20 tons of hydrogen per day |
| Equipment and | <ul style="list-style-type: none"> • All hydrogen process plants must limit total VOC emissions from all process | <ul style="list-style-type: none"> • Individual vents must comply with an emission limit of 15 pounds/day |

| Rule Element | South Coast AQMD Rule 1189 – Emission from Hydrogen Plant Process Vents (Adopted 1/21/00) | BAAQMD Rule 13-5 – Industrial Hydrogen Plants (Adopted 5/4/22) |
|------------------------|---|---|
| Operating Requirements | vents combined to 2.5 pounds of VOC per million standard cubic feet of hydrogen produced or 0.5 pounds of VOC per million standard cubic feet of hydrogen produced if the plant received a construction permit after January 21, 2001 | and 300 ppm total organic carbon compounds; or <ul style="list-style-type: none"> • Baseline methane emissions for the plant must be reduced by 90 percent |

There are differences between the rule structures that make direct comparison difficult. The primary intent of BAAQMD Rule 13-5 is to reduce methane emissions and, as such, the limits are expressed as total organic compounds rather than VOC. In addition, Rule 13-5 imposes explicit quantity and concentration limits, while Rule 1189 normalizes the VOC emission limits to the hydrogen throughput of the plant. Although the limits are expressed differently, Rule 1189 likely achieves an equivalent level of control compared to BAAQMD Rule 13-5.

c. Conclusion

Evaluation of rules for Miscellaneous/Other Fugitive Losses category revealed that South Coast AQMD’s rules are generally as stringent as other districts’ rules. Staff did not identify any potential contingency measures that can achieve quantifiable reductions within two years.

6. Cargo Tanks Fugitive Losses

Cargo Tanks Fugitive Emissions account for 3.49 tpd of VOC and zero NOx emissions in 2037. Most of the emissions in this category result from Gasoline Cargo Tanks (77 percent is related to pressure-related fugitive losses; 20 percent to product hose fugitive losses; and 3 percent to vapor hose fugitive losses). As the agency responsible for regulating Cargo Tank emissions is CARB, this source is excluded from South Coast AQMD’s analysis. Infeasibility justifications for area sources under CARB’s authority are presented in Appendix B.

Industrial Processes

Industrial processes account for 11.40 tpd of VOC emissions and 0.94 tpd of NOx emissions in 2037. The source categories contributing emissions include chemical, food and agriculture, mineral processes, metal processes, wood and paper, electronics, and other industrial processes as presented in Table 4-66. These categories are individually evaluated below.

TABLE 4-66
INDUSTRIAL PROCESSES SOURCE CATEGORY EMISSIONS BASED ON 2037 SUMMER PLANNING INVENTORY

| Industry | VOC (tpd) | NOx (tpd) |
|------------------------------------|--------------|-------------|
| 410 – Chemical | 4.60 | 0.07 |
| 420 – Food and Agriculture | 0.58 | 0.03 |
| 430 – Mineral Processes | 0.46 | 0.47 |
| 440 – Metal Processes | 0.12 | 0.34 |
| 450 – Wood and Paper | 0.26 | 0.00 |
| 460 – Glass and Related Products | 0.00 | 0.00 |
| 470 – Electronics | 0.02 | 0.00 |
| 499 – Other (Industrial Processes) | 5.37 | 0.03 |
| Total | 11.40 | 0.94 |

*Totals may not sum due to rounding

1. Chemical

a. Overview

MSC 410, pertaining to chemicals within industrial processes, accounts for 4.60 tpd of VOC emissions and 0.07 tpd of NOx emissions in 2037. Table 4-67 provides a detailed breakdown of NOx and VOC emissions from this source category.

TABLE 4-67
CHEMICAL EMISSIONS BASED ON 2037 SUMMER PLANNING INVENTORY

| Source Category | VOC (tpd) | NOx (tpd) |
|--|-----------|-----------|
| 321 – Tanks (unspecified) | 0.00 | 0.00 |
| 322 – Floating roof tanks – breathing losses | 0.00 | 0.00 |
| 324 – Floating roof tanks – working | 0.00 | 0.00 |
| 326 – Fixed roof tanks – breathing losses | 0.00 | 0.00 |
| 328 – Fixed roof tanks – working losses | 0.01 | 0.00 |
| 332 – Pressure tanks | 0.00 | 0.00 |
| 338 – Cooling towers | 0.00 | 0.00 |
| 340 – Wastewater treatment | 0.00 | 0.00 |
| 390 – Tank cars and trucks – working losses | 0.00 | 0.00 |
| 400 – Chemical manufacturing | 0.02 | 0.03 |
| 402 – Rubber and rubber products manufacturing | 0.85 | 0.00 |
| 403 – Fiberglass and fiberglass products manufacturing | 0.48 | 0.00 |
| 404 – Plastics and plastic products manufacturing | 2.98 | 0.04 |
| 407 – Paint and allied products manufacturing | 0.09 | 0.00 |
| 436 – Storage piles | 0.00 | 0.00 |
| 995 – Other (chemical processes) | 0.17 | 0.00 |

| Source Category | VOC (tpd) | NOx (tpd) |
|-----------------|-------------|-------------|
| Total | 4.60 | 0.07 |

Processes that contribute emissions to major source category 410 – Chemical include the manufacturing of plastic products, rubber products, chemicals, and fiberglass. Certain rules for these source categories are evaluated under Petroleum Production and Marketing due to overlap. For instance, storage tanks at chemical plants are subject to Rule 463, evaluated under Petroleum Production and Marketing - Storage Tanks and Related Losses, if the volume of the tanks is 75,000 liters or more. Meanwhile, VOC leaks at chemical plants are controlled by Rule 1173, evaluated under Petroleum Production and Marketing - Liquid and Gas/Vapor Leaks. Additionally, emissions from some chemical manufacturing facilities, including refineries, are also evaluated under Petroleum Production and Marketing.

b. Evaluation

Staff reviewed available control measures for this source category as implemented by South Coast AQMD and other state and local air agencies. Given the distinct rule structures across jurisdictions, direct comparisons can be challenging. Specifically, for controlling VOC emissions from plastic, rubber, and fiberglass manufacturing South Coast AQMD Rule 1141 (Control of Volatile Organic Compound Emissions from Resin), Rule 1162 (Polyester Resin Operations), and Rule 1163 (Control of Vinyl Chloride Emissions) were identified as applicable. For controlling VOC emissions from chemical manufacturing, Rule 1103 (Pharmaceutical and Cosmetic Manufacturing Operations) and Rule 1141.2 (Surfactant Manufacturing) were deemed applicable. Finally, paint and allied products manufacturing is regulated by Rule 1141.1 (Coatings and Ink Manufacturing). These categories are evaluated individually below.

i. Plastic, rubber, and fiberglass manufacturing

Control measures for sources in chemical industrial processes generally encompass various common strategies. In the case of VOC emissions from resin manufacturing and polyester resin operations, specific minimum VOC control efficiencies are mandated, contingent upon the resin production process employed. There are also VOC limits for the application of resin or gel coat materials onto open mold surfaces. To curtail fugitive VOC emissions resulting from VOC leaks in chemical plants, designated leak thresholds are established for different components or devices. Regular inspections and maintenance procedures are mandatory, with prompt repairs mandated upon the detection of violations, and mitigation fees may be imposed as part of enforcement. Table 4-68 provides a summary of the control measures considered for resin manufacturing.

It is important to note that SJVAPCD Rule 4684 (Amended 8/18/11)⁵⁷ and VCAPCD Rule 74.14 (Amended 4/12/05)⁵⁸ establish the exact same VOC limits for polyester resin operations as South Coast AQMD Rule

⁵⁷ SJVAPCD Rule 4684 – Polyester Resin Operations, Amended August 18, 2011.

<https://ww2.valleyair.org/media/ob5bqzxc/rule-4684.pdf>

⁵⁸ VCAPCD Rule 74.14 – Polyester Resin Material Operations, Revised April 12, 2005.

<http://www.vcapcd.org/Rulebook/Reg4/RULE%2074.14.pdf>

1162. As these rules align with South Coast AQMD Rule 1162, they have been omitted from Table 4-68 for brevity.

South Coast AQMD Rule 1141 requires a more stringent overall VOC control efficiency (98 percent) compared to BAAQMD rules (95 percent). South Coast AQMD Rule 1162 includes a total of 14 source category VOC content limits ranging from 10 to 48 percent by weight for polyester resin operations. These limits are comparable to or more stringent than rules from other agencies or national standards. While U.S. EPA emission standard 40 CFR 63 Subpart VVVV and MDAQMD Rule 1162 have specific VOC limits for fiberglass boat manufacturing operations, South Coast AQMD Rule 1162 does not exempt these operations and therefore, they are subject to the general requirements in the rule. In summary, Rule 1141 and Rule 1162 are generally as stringent as other agencies' rules.

**TABLE 4-68
CONTROL MEASURES IMPLEMENTED BY SOUTH COAST AQMD AND OTHER DISTRICTS FOR RESIN MANUFACTURING**

| | South Coast AQMD Rule 1141 – Control of Volatile Organic Compound Emissions from Resin Manufacturing (Amended 11/17/00) and Rule 1162 Polyester Resin Operations (Amended 7/8/05) | BAAQMD Rule 8-36 – Resin Manufacturing (Adopted 6/6/84) | MDAQMD Rule 1162 – Polyester Resin Operations (Amended 4/23/18) | U.S. EPA 40 CFR 63 Subpart VVVV – National Emission Standard for Hazardous Air Pollutants for Boat Manufacturing (Amended 3/20/20) | SMAQMD Rule 465 – Polyester Resin Operations (Amended 9/25/08) |
|---------------------------------|---|--|---|--|--|
| Applicability | Applies to resin manufacturing and polyester resin manufacturing which emit VOC | Emissions of precursor organic compounds from resin manufacturing operations | Applies to manufacture of products from, or the use of, Polyester Resin Material | Establishes national emission standards for hazardous air pollutants (HAP) for new and existing boat manufacturing facilities that are major sources of HAPs | Applies to polyester resin operations which emit VOC within Sacramento County |
| Control Measure/Emission Limits | <p>An operator shall not manufacture organic resin:</p> <ul style="list-style-type: none"> • Unless VOC from the reactor, thinning tank and blending tank vents are reduced: <ul style="list-style-type: none"> ○ to 0.5 pound per 1,000 pounds of completed resin produced, or ○ by 95% or more • By a continuous polystyrene process unless VOC from vacuum devolatilizer systems and styrene recovery systems are reduced to 0.12 pound per 1,000 pounds of completed resin produced • By a liquid-phase high-density polyethylene slurry process unless VOC from reactor, recycle treaters, | <p>Total VOC emissions to the atmosphere from the resin reactor, thinning tank and blending tank are abated by 95% or more</p> <p>VOC emissions from all resin reactors, thinning tanks and blending tanks do not exceed 10 lb per day</p> | <p>Tooling Resin Atomized (spray) is 30% weight average monomer</p> <p>limits the weighted average monomer VOC content for fiberglass boat manufacturing operations</p> | <p>VOC limits for 7 source categories:</p> <p>Pigmented Gel Coat Operations is 33%; Tooling Resin Operations is 30–39%; Tooling Gel Coat Operations is 40%; Clear Gel Coat Operations is 48%; Production Resin Operations is 28-35%.</p> | <p>Resins, less than 35% by weight average monomer</p> <p>VOC content limits by weight:</p> <p>Pigmented gel coats is 45%; Specialty resins and clear gel coats is 50%</p> |

| | <p>South Coast AQMD Rule 1141 – Control of Volatile Organic Compound Emissions from Resin Manufacturing (Amended 11/17/00) and Rule 1162 Polyester Resin Operations (Amended 7/8/05)</p> | <p>BAAQMD Rule 8-36 – Resin Manufacturing (Adopted 6/6/84)</p> | <p>MDAQMD Rule 1162 – Polyester Resin Operations (Amended 4/23/18)</p> | <p>U.S. EPA 40 CFR 63 Subpart VVVV – National Emission Standard for Hazardous Air Pollutants for Boat Manufacturing (Amended 3/20/20)</p> | <p>SMAQMD Rule 465 – Polyester Resin Operations (Amended 9/25/08)</p> |
|--|--|--|--|---|---|
| | <p>thinning tank, blending tank and product finishing section are reduced by 98% or more</p> <ul style="list-style-type: none"> • By a liquid-phase polypropylene process VOC from reactor, slurry vacuum filter system, diluent recovery section, and product finishing section vents are reduced by 98% or more <p>VOC limits (monomer content) from 10-48% by weight or alternatively 90% control efficiency for add-on control. Various requirements when applying resin or gel coat materials to open mold surface. Monomer (VOC) content limits from 10 to 48% by weight for 14 source categories:</p> <ul style="list-style-type: none"> • Clear gel coat: 40–44% • Pigmented gel coat: 28–37% • Specialty gel coats: 48% • General purpose resins: 10–17% • Others polyester resins: 35% | | | | |

Vinyl chloride,⁵⁹ a colorless carcinogenic gas used in the process of making polyvinyl chloride (PVC) plastic and vinyl products, is also a VOC. In 1976, U.S. EPA finalized the national emission standard for hazardous air pollutants (NESHAP) for vinyl chloride and, in 1978, CARB established the California Ambient Air Quality Standard (CAAQS) for vinyl chloride. The standard was set at 0.010 ppm as a 24-hour average because it was the lowest level that could be reliably measured at the time the standard was promulgated.⁶⁰ However, as a carcinogen, no level of exposure to vinyl chloride is without risk. South Coast Rule 1163 – Control of Vinyl Chloride Emissions was adopted in 1985 to address the CAAQS and NESHAP and regulate plants that produce vinyl chloride by any process. Similarly, BAAQMD adopted Rule 11-6 – Vinyl Chloride in 1982.

In 1987, the California Air Toxics "Hot Spots" Information and Assessment Act (AB 2588) established a statewide program for the inventory, monitoring, and reporting of air toxics emissions from individual facilities, as well as requirements for risk assessment and public notification of potential health risks. South Coast AQMD implemented AB 2588 for Basin via the Air Toxics Program that lists and regulates toxic air contaminants (TAC),⁶¹ including vinyl chloride, and establishes a cancer unit risk factor for each TAC.

Table 4-69 summarizes the control measures for vinyl chloride. The emission limits under South Coast AQMD Rule 1163 are equivalent to U.S. EPA emission standard 40 CFR 61 Subpart F and BAAQMD Rule 11-6.

⁵⁹ Title 40, Code of Federal Regulations (CFR) Part 61 (40 CFR 61) Subpart F, <https://www.ecfr.gov/current/title-40/part-61/subpart-F>

⁶⁰ CARB Vinyl Chloride & Health webpage <https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health#:~:text=As%20a%20carcinogen%2C%20no%20level,under%20CARB's%20Air%20Toxics%20Program>

⁶¹ Section 39655 of the California Health and Safety Code defines a TAC as an air pollutant which may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health

TABLE 4-69
SOUTH COAST AQMD RULE 1163 COMPARATIVE ANALYSIS

| | South Coast AQMD Rule 1163 – Control of Vinyl Chloride Emissions (Adopted 6/7/85) | BAAQMD Rule 11-6 – Vinyl Chloride (Adopted 4/21/82) | U.S. EPA 40 CFR 61 Subpart F – National Emission Standard for Hazardous Air Pollutants for Vinyl Chloride (Amended 10/17/00) |
|---------------|---|---|---|
| Applicability | Plants which produce: <ul style="list-style-type: none"> • Ethylene dichloride by reaction of oxygen and hydrogen chloride with ethylene • Vinyl chloride by any process • One or more polymers containing any fraction of polymerized vinyl chloride | Control emissions of vinyl chloride into the atmosphere from plants which produce: <ul style="list-style-type: none"> • ethylene dichloride by reaction of oxygen • hydrogen chloride with ethylene • vinyl chloride by any process • one or more polymers containing any fraction of polymerized vinyl chloride | Establishes national emission standards for hazardous air pollutants (HAP) for Plants which produce: <ul style="list-style-type: none"> • Ethylene dichloride by reaction of oxygen and hydrogen chloride with ethylene • Vinyl chloride by any process • One or more polymers containing any fraction of polymerized vinyl chloride |
| Requirements | A person operating a designated plant shall vent the following equipment containing more than 10 ppm of vinyl chloride to air pollution control equipment: <ul style="list-style-type: none"> • Vents of or appurtenances venting: • Reactors • Storage tanks or surge tanks • Purification vessels or other equipment used for purification • Stripper vessels • Combination reactor-stripper vessels • Mixing, weighing or holding tanks • Monomer recovery equipment • Receiving vessel • Other equipment as required by the Executive Officer | A person shall not discharge into the atmosphere: <ul style="list-style-type: none"> • from an oxychlorination reactor a gas stream with a concentration of vinyl chloride > 0.20 g/kg (0.0002 lb/lb) of 100 percent ethylene dichloride produced • vinyl chloride emissions from a reactor or stripper vessel when opened shall not be > 0.02 g/kg (0.00002 lb/lb) of polyvinyl chloride product (on a dry basis) The concentration shall not exceed 10 ppm from: <ul style="list-style-type: none"> • equipment at an ethylene dichloride purification plant or used | A person shall not discharge into the atmosphere: <ul style="list-style-type: none"> • from an oxychlorination reactor a gas stream with a concentration of vinyl chloride > 0.20 g/kg (0.0002 lb/lb) of 100 percent ethylene dichloride produced • vinyl chloride emissions from a reactor or stripper vessel when opened shall not be > 0.02 g/kg (0.00002 lb/lb) of polyvinyl chloride product (on a dry basis) The concentration shall not exceed 10 ppm from: <ul style="list-style-type: none"> • equipment at an ethylene dichloride purification plant or used |

| | South Coast AQMD Rule 1163 – Control of Vinyl Chloride Emissions (Adopted 6/7/85) | BAAQMD Rule 11-6 – Vinyl Chloride (Adopted 4/21/82) | U.S. EPA 40 CFR 61 Subpart F – National Emission Standard for Hazardous Air Pollutants for Vinyl Chloride (Amended 10/17/00) |
|--|--|--|--|
| | <p>An operation shall not allow the discharge of concentrations equal to or greater than 10 ppb, measured at any point beyond the property line</p> <p>Limit the total amount of vinyl chloride in the discharge of all control equipment at less than 50 grams per hour for polyvinyl chloride plants, ethylene dichloride, and vinyl chloride plants</p> <p>All vent valves or relief devices (except emergency relief valves) on equipment upstream of the stripping operation or post catalysis shall be vented to a receiving vessel</p> <p>Product from reactors which cannot be used in subsequent operations, such as stripping, blending or drying, shall be discharged to a sealed container and vented to a receiving vessel</p> <p>Reactors and other equipment upstream from the stripper shall be equipped with automatic pressure reduction systems which will open at a pressure between operating pressure and the emergency pressure relief valve setting, directed to a</p> | <p>in vinyl chloride formation or purification</p> <ul style="list-style-type: none"> • any reactor at a polyvinyl chloride plant • from each mixing, weighing or holding container in vinyl chloride service which precedes the stripper (or reactor if the plant has no stripper) • a monomer recovery system • a polyvinyl chloride stripper • slip gauges ducted through a control device during loading or unloading • reciprocating pumps and compressors that are sealless or double mechanical seals • any leak from agitators • manual venting of gases • in each in-process wastewater stream <p>Miscellaneous Sources Following a Polyvinyl Chloride Stripper shall not exceed:</p> <ul style="list-style-type: none"> • Polyvinyl chloride dispersion resins excluding latex resins <2,000 ppm • All other polyvinyl chloride resins, including latex resins, averaged separately for each type of resin <4,000 ppm | <p>in vinyl chloride formation or purification</p> <ul style="list-style-type: none"> • any reactor at a polyvinyl chloride plant • from each mixing, weighing or holding container in vinyl chloride service which precedes the stripper (or reactor if the plant has no stripper) • a monomer recovery system • a polyvinyl chloride stripper • slip gauges ducted through a control device during loading or unloading • reciprocating pumps and compressors that are sealless or double mechanical seals • any leak from agitators • manual venting of gases • in each in-process wastewater stream <p>Miscellaneous Sources Following a Polyvinyl Chloride Stripper shall not exceed:</p> <ul style="list-style-type: none"> • 2,000 ppm for polyvinyl chloride dispersion resins excluding latex resins • 400 ppm for all other polyvinyl chloride resins, including latex resins, averaged separately for each type of resin |

| | South Coast AQMD Rule 1163 – Control of Vinyl Chloride Emissions (Adopted 6/7/85) | BAAQMD Rule 11-6 – Vinyl Chloride (Adopted 4/21/82) | U.S. EPA 40 CFR 61 Subpart F – National Emission Standard for Hazardous Air Pollutants for Vinyl Chloride (Amended 10/17/00) |
|--|---|---|---|
| | <p>receiving vessel, vapor recovery system, or air pollution control system</p> <p>Any detected leaks by the operator shall be eliminated within 24 hours of detection.</p> | <p>Polyvinyl chloride plants controlling vinyl chloride emissions with technology other than stripping, shall not exceed:</p> <ul style="list-style-type: none"> • Dispersion polyvinyl chloride resins excluding latex resins <2 g/kg (0.002 lb/lb) of dry solid product from the stripper (or reactor if no stripper is used) • All other polyvinyl chloride resins, including latex resins <0.4 g/kg (0.0004 lb/lb) of dry solid product from the stripper (or reactor if no stripper is used) <p>Before opening of the equipment, the quantity of vinyl chloride in the equipment shall not contain more than 2.0% by volume vinyl chloride or 0.0950 m3 (25 gal) of vinyl chloride, whichever is larger.</p> | <p>Polyvinyl chloride plants controlling vinyl chloride emissions with technology other than stripping, shall not exceed:</p> <ul style="list-style-type: none"> • 2 g/kg (0.002 lb/lb) of dry solid product from the stripper (or reactor if no stripper is used) for dispersion polyvinyl chloride resins excluding latex resins • 0.4 g/kg (0.0004 lb/lb) of dry solid product from the stripper (or reactor if no stripper is used) for all other polyvinyl chloride resins, including latex resins <p>Before opening of the equipment, the quantity of vinyl chloride in the equipment shall not contain more than 2.0% by volume vinyl chloride or 0.0950 m3 (25 gal) of vinyl chloride, whichever is larger.</p> |

ii. Chemical manufacturing

South Coast AQMD Rule 1103 reduces VOC emissions from pharmaceuticals and cosmetic manufacturing operations and is compared to rules at other agencies in Table 4-70. Rule 1103 is as stringent as other agencies' applicable rules.

TABLE 4-70
SOUTH COAST AQMD RULE 1103 COMPARATIVE ANALYSIS

| Rule Element | South Coast AQMD Rule 1103 – Pharmaceutical and Cosmetic Manufacturing Operations (Amended 3/12/99) | SDAPCD Rule 67.15 – Pharmaceutical and Cosmetic Manufacturing Operations (Amended 5/15/96) | CAQCC Regulation Number 25 – Control of Emissions from Surface Coating, Solvents, Asphalt, Graphic Arts and Printing, and Pharmaceuticals (Adopted 12/20/24) | BAAQMD Rule 8-24 – Pharmaceutical and Cosmetic Manufacturing Operations (Amended 6/15/94) |
|---------------|---|--|---|---|
| Applicability | To reduce VOC emissions from (1) the manufacture of pharmaceutical and cosmetic products by chemical processes; (2) the production and separation of medicinal chemicals such as antibiotics and vitamins from microorganisms; (3) the manufacture of botanical and biological products by the extraction of organic chemicals from vegetable materials or animal tissues; and (4) the formulation of pharmaceuticals into various dosage forms such as tablets, capsules, injectable solutions or ointments, that can be taken by the patient immediately and in an accurate amount; and the | (1) Manufactures pharmaceutical or cosmetic products; (2) Formulates ointments or cosmetics into configurations intended for sale and/or use; (3) Produces and/or separates medicinal chemicals such as antibiotics and vitamins from micro-organisms; (4) Manufactures botanical and/or biological products by the extraction of organic chemicals from vegetative materials or animal tissues; or (5) Formulates pharmaceutical products into various dosage forms such as tablets, capsules | All sources of volatile organic compounds associated with pharmaceutical manufacturing activities, including, but not limited to, reactors, distillation units, dryers, storage of VOC, extraction equipment, filters, crystallizers, and centrifuges | To limit emissions of organic compounds from the manufacture of pharmaceutical and cosmetic products or devices |

| Rule Element | South Coast AQMD Rule 1103 – Pharmaceutical and Cosmetic Manufacturing Operations (Amended 3/12/99) | SDAPCD Rule 67.15 – Pharmaceutical and Cosmetic Manufacturing Operations (Amended 5/15/96) | CAQCC Regulation Number 25 – Control of Emissions from Surface Coating, Solvents, Asphalt, Graphic Arts and Printing, and Pharmaceuticals (Adopted 12/20/24) | BAAQMD Rule 8-24 – Pharmaceutical and Cosmetic Manufacturing Operations (Amended 6/15/94) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|---|--|--|---|------|-----------|------|-----------|-----|-----------|-------|------|-------|--|-----------------------------------|---|-----------|------|-----------|------|-----------|-----|-----------|-------|------|-------|---|--|---|---------|------|-----------|------|-----------|------|-----------|-----|-----------|-------|------|-------|---|-----------------------------------|---|-----------|------|-----------|------|-----------|-----|-----------|-------|------|-------|
| | formulation of cosmetics into configurations intended for consumer use. | or injectable solutions that can be taken by a patient immediately and in an accurate amount | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Requirements | <ul style="list-style-type: none"> Shall not use reactors, distillation columns, crystallizers, or centrifuges emitting more than 15 lb/day of VOC for each unit unless the vents are equipped with surface condensers or equivalent control devices as specified: <table border="1" data-bbox="401 1003 762 1360"> <thead> <tr> <th>VOC Total Vapor Pressure (psi) at 20°C</th> <th>Max. condenser outlet gas Temp.</th> </tr> </thead> <tbody> <tr><td>0.5 – 1.0</td><td>25°C</td></tr> <tr><td>1.0 – 1.5</td><td>10°C</td></tr> <tr><td>1.5 – 2.9</td><td>0°C</td></tr> <tr><td>2.9 – 5.8</td><td>-15°C</td></tr> <tr><td>>5.8</td><td>-25°C</td></tr> </tbody> </table> | VOC Total Vapor Pressure (psi) at 20°C | Max. condenser outlet gas Temp. | 0.5 – 1.0 | 25°C | 1.0 – 1.5 | 10°C | 1.5 – 2.9 | 0°C | 2.9 – 5.8 | -15°C | >5.8 | -25°C | <ul style="list-style-type: none"> Reactors, distillation columns, crystallizers or centrifuges emitting >15 lb/day VOC shall not be used unless all vent points are equipped with surface condensers that have outlet exhaust gas temperature: <table border="1" data-bbox="783 967 1144 1325"> <thead> <tr> <th>VOC Vapor Pressure (psia) at 20°C</th> <th>Max. Temp. gas stream exiting condenser</th> </tr> </thead> <tbody> <tr><td>0.5 – 1.0</td><td>25°C</td></tr> <tr><td>1.0 – 1.5</td><td>10°C</td></tr> <tr><td>1.5 – 2.9</td><td>0°C</td></tr> <tr><td>2.9 – 5.8</td><td>-15°C</td></tr> <tr><td>>5.8</td><td>-25°C</td></tr> </tbody> </table> <ul style="list-style-type: none"> Alternative control devices with combined VOC | VOC Vapor Pressure (psia) at 20°C | Max. Temp. gas stream exiting condenser | 0.5 – 1.0 | 25°C | 1.0 – 1.5 | 10°C | 1.5 – 2.9 | 0°C | 2.9 – 5.8 | -15°C | >5.8 | -25°C | <ul style="list-style-type: none"> Control VOC emissions from each vent that has the potential to emit 15 lb/day or more from reactors, distillation operations, crystallizers, centrifuge and vacuum dryers that have outlet exhaust gas temperature: <table border="1" data-bbox="1165 967 1526 1399"> <thead> <tr> <th>VOC True Vapor Pressure (psia) at 20°C</th> <th>Max. Temp. gas stream exiting condenser</th> </tr> </thead> <tbody> <tr><td>0 – 0.5</td><td>35°C</td></tr> <tr><td>0.5 – 1.0</td><td>25°C</td></tr> <tr><td>1.0 – 1.5</td><td>10°C</td></tr> <tr><td>1.5 – 2.9</td><td>0°C</td></tr> <tr><td>2.9 – 5.8</td><td>-15°C</td></tr> <tr><td>>5.8</td><td>-25°C</td></tr> </tbody> </table> | VOC True Vapor Pressure (psia) at 20°C | Max. Temp. gas stream exiting condenser | 0 – 0.5 | 35°C | 0.5 – 1.0 | 25°C | 1.0 – 1.5 | 10°C | 1.5 – 2.9 | 0°C | 2.9 – 5.8 | -15°C | >5.8 | -25°C | <ul style="list-style-type: none"> Emit VOC no more than 15 lb/day from any reactor, distillation column, crystallizer or centrifuge that have outlet exhaust gas temperature: <table border="1" data-bbox="1547 850 1908 1208"> <thead> <tr> <th>VOC Vapor Pressure (psia) at 20°C</th> <th>Max. Temp. gas stream exiting condenser</th> </tr> </thead> <tbody> <tr><td>0.5 – 1.0</td><td>25°C</td></tr> <tr><td>1.0 – 1.5</td><td>10°C</td></tr> <tr><td>1.5 – 2.9</td><td>0°C</td></tr> <tr><td>2.9 – 5.8</td><td>-15°C</td></tr> <tr><td>>5.8</td><td>-25°C</td></tr> </tbody> </table> <ul style="list-style-type: none"> Emit no more than 33 lb/day VOC from separation operations, sterilizers, air dryers | VOC Vapor Pressure (psia) at 20°C | Max. Temp. gas stream exiting condenser | 0.5 – 1.0 | 25°C | 1.0 – 1.5 | 10°C | 1.5 – 2.9 | 0°C | 2.9 – 5.8 | -15°C | >5.8 | -25°C |
| VOC Total Vapor Pressure (psi) at 20°C | Max. condenser outlet gas Temp. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 0.5 – 1.0 | 25°C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1.0 – 1.5 | 10°C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1.5 – 2.9 | 0°C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2.9 – 5.8 | -15°C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| >5.8 | -25°C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| VOC Vapor Pressure (psia) at 20°C | Max. Temp. gas stream exiting condenser | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 0.5 – 1.0 | 25°C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1.0 – 1.5 | 10°C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1.5 – 2.9 | 0°C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2.9 – 5.8 | -15°C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| >5.8 | -25°C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| VOC True Vapor Pressure (psia) at 20°C | Max. Temp. gas stream exiting condenser | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 0 – 0.5 | 35°C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 0.5 – 1.0 | 25°C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1.0 – 1.5 | 10°C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1.5 – 2.9 | 0°C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2.9 – 5.8 | -15°C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| >5.8 | -25°C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| VOC Vapor Pressure (psia) at 20°C | Max. Temp. gas stream exiting condenser | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 0.5 – 1.0 | 25°C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1.0 – 1.5 | 10°C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1.5 – 2.9 | 0°C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2.9 – 5.8 | -15°C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| >5.8 | -25°C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Rule Element | South Coast AQMD Rule 1103 – Pharmaceutical and Cosmetic Manufacturing Operations (Amended 3/12/99) | SDAPCD Rule 67.15 – Pharmaceutical and Cosmetic Manufacturing Operations (Amended 5/15/96) | CAQCC Regulation Number 25 – Control of Emissions from Surface Coating, Solvents, Asphalt, Graphic Arts and Printing, and Pharmaceuticals (Adopted 12/20/24) | BAAQMD Rule 8-24 – Pharmaceutical and Cosmetic Manufacturing Operations (Amended 6/15/94) |
|--------------|--|---|--|--|
| | <ul style="list-style-type: none"> • Operators shall not use centrifuges, rotary vacuum filters, or other devices with exposed liquid surfaces containing VOC with a vapor pressure of ≥ 0.5 psi at 20°C unless the devices have a hood or enclosure with a collection system that directs VOC emissions to a control device • Shall not use in-process tanks for material containing VOC unless an apparatus or cover which prevents VOC evaporation is provided for the tank • For production equipment that emits ≥ 330 lb/day of uncontrolled VOC, emissions shall be reduced by at least 90% by weight | <p>collection and abatement efficiency of at least 90%</p> <ul style="list-style-type: none"> • Centrifuges, rotary vacuum filters, or other devices with exposed liquid surfaces containing VOC with a vapor pressure of ≥ 0.5 psia at 68°F must use a VOC collection and abatement system that reduces emissions by at least 90% weight • Process tanks containing VOC with a vapor pressure of ≥ 0.5 psia at 20°C must be covered or sealed at all times, except during loading, unloading, or maintenance • Air dryers or production equipment emitting ≥ 33 lb/day of VOC must reduce emissions by at least 90% by weight | <ul style="list-style-type: none"> • Division approval is required for control equipment used to control VOC of 11 psia and above • Reduce VOC emissions from each air dryer and production equipment exhaust system: <ul style="list-style-type: none"> ○ By at least 90% by weight if emissions are ≥ 330 lb/day, or ○ To ≤ 33 lb/day if emissions are < 330 lb/day • A vapor balance system or equivalent control at least 90% effective in reducing emissions from truck or railcar deliveries to storage tanks with capacities $> 2,000$ gallons that store VOC with TVP > 4.1 psia at 20°C | <ul style="list-style-type: none"> • All storage tanks that store organic liquids with a VP > 1.5 psia at 20°C shall be equipped with pressure/vacuum vents set at ± 0.03 psia |

| Rule Element | South Coast AQMD Rule 1103 – Pharmaceutical and Cosmetic Manufacturing Operations (Amended 3/12/99) | SDAPCD Rule 67.15 – Pharmaceutical and Cosmetic Manufacturing Operations (Amended 5/15/96) | CAQCC Regulation Number 25 – Control of Emissions from Surface Coating, Solvents, Asphalt, Graphic Arts and Printing, and Pharmaceuticals (Adopted 12/20/24) | BAAQMD Rule 8-24 – Pharmaceutical and Cosmetic Manufacturing Operations (Amended 6/15/94) |
|--------------|---|---|---|---|
| | <ul style="list-style-type: none"> • For production equipment that emits <330 lb/day of uncontrolled VOC, emissions shall be reduced to below 33 lb/day • Reduce VOC emissions by 90% by weight during transfers from trucks or rail cars into storage tanks of ≥2,000 gallons if the VOC vapor pressure is >4.1 psi at 20°C • Install pressure/vacuum vents set at ±0.03 psig on storage tanks that store VOC with a vapor pressure >1.5 psia at 20°C • Repair all liquid leaks within 24 hours of detecting the leak | <ul style="list-style-type: none"> • VOC with a vapor pressure >1.5 psia at 20°C cannot be transferred into a stationary storage tank over 2,000 gallons unless the tank has the following controls: <ul style="list-style-type: none"> ○ A submerged fill pipe discharging within 6 inches of the tank bottom ○ A vapor return line that transfers at least 90% of displaced VOC vapor back to the supply tank ○ A pressure-vacuum relief valve with settings of ±0.03 psig ○ Alternatively, an approved VOC emission control system with at least 90% collection and | <ul style="list-style-type: none"> • Install pressure/vacuum conservation vents set at ±0.2 kPa on all storage tanks that store VOC with TVP >1.5 psi at 20°C | |

| Rule Element | South Coast AQMD Rule 1103 – Pharmaceutical and Cosmetic Manufacturing Operations (Amended 3/12/99) | SDAPCD Rule 67.15 – Pharmaceutical and Cosmetic Manufacturing Operations (Amended 5/15/96) | CAQCC Regulation Number 25 – Control of Emissions from Surface Coating, Solvents, Asphalt, Graphic Arts and Printing, and Pharmaceuticals (Adopted 12/20/24) | BAAQMD Rule 8-24 – Pharmaceutical and Cosmetic Manufacturing Operations (Amended 6/15/94) |
|--------------|---|--|--|---|
| | | <p>abatement efficiency during transfer</p> <ul style="list-style-type: none"> • Fugitive liquid leaks in equipment storing, mixing, blending or transferring VOC shall be promptly repaired • Fugitive vapor leaks from equipment storing, mixing, blending, reacting or transferring materials containing VOC shall be immediately recorded and repaired | | |

South Coast AQMD Rule 1141.2 – Surfactant Manufacturing aims to reduce VOC emissions from all manufacturing of surface-active agents, including detergents, wetting agents, and emulsifiers. It requires a surfactant manufacturer to reduce VOC emissions to 0.5 pounds per 1,000 pounds of surfactant produced or by at least 95 percent by weight. In addition, all ports used for inspection, taking samples, or adding ingredients must be closed when not in use. Soap manufacturing operations, facilities that only blend and package surfactants, and facilities that emit less than 5 pounds per day or less than 110 pounds per month of VOC are exempt. As there is no analogous rule in other air districts that is comparable to Rule 1141.2, no further evaluation was performed.

iii. Paint and allied products manufacturing

South Coast AQMD Rule 1141.1 – Coatings and Ink Manufacturing applies to this source category. Staff identified comparable rules in other districts including BAAQMD Rule 8-35, SJVAPCD Rule 4652, AVAQMD Rule 1141.1, and SDAPCD Rule 67.19. Upon analysis, AVAQMD and SJVAPCD's rules were determined to contain requirements that are identical to those in South Coast AQMD's rule. For brevity, those rules have been omitted from the comparative analysis presented in Table 4-71.

**TABLE 4-71
COMPARISON OF SOUTH COAST AQMD RULE 1141.1 WITH RULES AT OTHER AGENCIES**

| Rule Element | South Coast AQMD Rule 1141.1 – Coatings and Ink Manufacturing (Amended 11/17/00) | BAAQMD Rule 8-35 – Coating, Ink and Adhesive Manufacturing (Amended 6/15/94) | SDAPCD Rule 67.19 – Coatings and Printing Inks Manufacturing Operations (Amended 5/15/96) |
|---------------|--|--|---|
| Applicability | Applies to coating and ink manufacturers, defined as an establishment that mixes, blends, and/or compounds paints, printing inks, varnishes, lacquers, enamels, shellacs, or sealers | Applies to manufacturers of coatings, inks, and adhesives | Any person who manufactures coatings or printing inks |
| Exemptions | <ul style="list-style-type: none"> • Coatings and/or ink manufacturers which produce less than 500 gallons of coatings and/or ink in any one day • Coatings and/or ink manufacturers which produce less than 11,000 gallons of coatings and/or ink in any one calendar month • Portable mixing vat requirements do not apply to equipment while it is being used in the production of water-based coatings and/or paste inks • Mixing vat requirements do not apply to equipment used to produce coatings in vats with a volume of 12 gallons or less. | <ul style="list-style-type: none"> • Mixing vat lid requirements do not apply if the emissions are vented to an emission control system with an 80% overall control efficiency • Portable and stationary vat mixing requirements do not apply to any equipment while it is being used in the production of low VOC coatings, inks or adhesives | <ul style="list-style-type: none"> • Mixing vats that are used exclusively for mixing water-based coatings or inks • Any stationary source where emissions of VOC from all coating and/or printing ink manufacturing operations are less than an average of 15.0 pounds (6.8 kg) per day of operation for each calendar month • Stationary tank requirements do not apply to any stationary storage tank with a capacity of less than 550 gallons • Facilities with combined uncontrolled emissions of VOC from all coating and/or ink manufacturing operations, including emissions from equipment cleaning, are less than 50 tons in each calendar year, are not required to operate an emission control system |

| Rule Element | South Coast AQMD Rule 1141.1 – Coatings and Ink Manufacturing (Amended 11/17/00) | BAAQMD Rule 8-35 – Coating, Ink and Adhesive Manufacturing (Amended 6/15/94) | SDAPCD Rule 67.19 – Coatings and Printing Inks Manufacturing Operations (Amended 5/15/96) |
|--------------|--|--|--|
| Requirements | <ul style="list-style-type: none"> • Stationary mixing vats must be covered except to add ingredients or take samples • Portable mixing vats must be covered such that the lid: <ul style="list-style-type: none"> • extends at least 1/2 inch beyond the outer rim of the vat or is attached to the rim of the vat; and • is maintained in good condition and maintains contact with the rim for at least 90 percent of the circumference of the rim of the vat; and • has a slit to allow clearance for insertion of a mixer shaft. The slit shall be covered after insertion of the mixer, except to allow safe clearance for the mixer shaft. • Portable mixing vats, stationary vats, high-speed dispersion mills, grinding mills, and roller mills must be cleaned in a way which minimizes the emissions of VOC into the atmosphere • Grinding mills must have fully enclosed screens | <ul style="list-style-type: none"> • Stationary and portable mixing vats must be covered such that: <ul style="list-style-type: none"> • Lids are maintained in good condition and maintain contact with 90 percent of the circumference of the rim of the vat; • Lids may have a slit to allow clearance for insertion of a mixer shaft. The slit shall be covered after insertion of the mixer, except to allow safe clearance for the mixer shaft. There must be no other holes, tears, or openings in the lid; and • The difference between the diameter of the mixer shaft and the diameter of the opening in the lid for the mixer shaft, shall be no greater than 5.1 cm (2 inches). • Operators must choose from one or more of the following cleaning requirements: <ul style="list-style-type: none"> • Cleaning materials must contain less than 200 g/L VOC • Operate closed cleaning systems that are maintained leak free, solvents must be drained from the cleaning equipment before the system is opened to the atmosphere, and solvents shall not | <ul style="list-style-type: none"> • Mixing vats must be covered such that the lid: <ul style="list-style-type: none"> • extends at least 1/2 inch beyond the outer rim of the vat or is attached to the rim of the vat for at least 90 percent of the circumference of the rim of the vat; and • is maintained in good condition with no holes, tears, or openings in the lid; and • may have a slit to allow clearance for insertion of a mixer shaft. The width of the slit shall be no more than 2 inches greater than the diameter of the mixing shaft. • Facilities with VOC emissions greater than 50 tons per year must operate an emission control system for vats with an overall control efficiency of at least 90 percent by weight • Stationary tanks must be equipped with a submerged fill pipe or an emission control device • Fugitive liquid leaks in equipment storing, mixing, blending, or transferring materials containing more than 10 percent of VOC by |

| Rule Element | South Coast AQMD Rule 1141.1 – Coatings and Ink Manufacturing (Amended 11/17/00) | BAAQMD Rule 8-35 – Coating, Ink and Adhesive Manufacturing (Amended 6/15/94) | SDAPCD Rule 67.19 – Coatings and Printing Inks Manufacturing Operations (Amended 5/15/96) |
|--------------|--|--|---|
| | | <p>be stored or disposed of in such a manner that will cause or allow evaporation into the atmosphere</p> <ul style="list-style-type: none"> • Collect and vent the emissions from equipment cleaning to an approved emission control system that has an overall abatement efficiency of 80% or more on a mass basis. • Use solvents that contain greater than 200 g/L VOC provided that no more than 228 L are used per month and solvents are collected, stored, or reused • Grinding mills shall have fully enclosed screens. • A person shall not operate a stationary vat, which emits more than 6.8 kg (15 lbs.) per day of organic compounds unless all emissions from the vat have been vented to an approved emission control system that has an overall abatement efficiency of 80% or more on a mass basis. | <p>weight must be repaired within 72 hours</p> <ul style="list-style-type: none"> • Cleaning operations must: <ul style="list-style-type: none"> • Employ cleaning material that contains 200 g/L or less of VOC or has a total vapor pressure of VOC of 20 mm Hg or less at 68°F (20°C); or • Cleaning is conducted using an enclosed system; or • Cleaning material is collected in a manner to minimize emissions; or • Cleaning material must be flushed through the equipment. |

BAAQMD Rule 8-35 contains some provisions which are potentially more stringent than those in South Coast AQMD Rule 1141.1. For example, Rule 8-35 does not exempt low production coating and ink manufacturers. In addition, for stationary vats, Rule 8-35 sets a VOC limit of 15 lbs/day unless the vat is equipped with an emission control system, while Rule 1141.1 contains no such requirement. Staff considered these as potential contingency measures in Rule 1141.1. However, removing the exemptions for low production facilities in Rule 1141.1 would require these facilities to make structural modifications such as installing lids on the mixing vats. Similarly, vats emitting greater than 15 lbs/day would have to install advanced emission control systems. Structural modifications as well as development and installation of control systems would require more than two years to implement. Contingency measures that do not achieve reductions within two years of being triggered are inconsistent with the guidelines specified in U.S. EPA’s guidance. Therefore, staff does not propose any contingency measures.

c. Conclusion

Staff reviewed the control measures currently in place for the MSC 410 – Chemical Industrial Processes category and determined that the existing measures implemented in the Basin are as stringent as comparable rules from other agencies. No feasible contingency measures were identified.

2. Food and Agriculture

a. Overview

Major source category 420 – Food and Agriculture includes emissions from various types of processing operations including food and agricultural products processing, bakeries, breweries, and wineries. The projected 2037 baseline emissions for this category include 0.58 tpd of VOC and 0.03 tpd of NOx emissions, summarized in Table 4-72. Among the food and agriculture source categories, bakeries contribute the largest amount of VOC emissions. South Coast AQMD regulates VOC emissions in this source category through Rule 1153 – Commercial Bakery Ovens and Rule 1131 – Food Product Manufacturing.

**TABLE 4-72
FOOD AND AGRICULTURE EMISSIONS BASED ON 2037 SUMMER PLANNING INVENTORY**

| Source Category | VOC (tpd) | NOx (tpd) |
|---|-----------|-----------|
| 321 – Tanks (unspecified) | 0.00 | 0.00 |
| 326 – Fixed roof tanks – breathing losses | 0.00 | 0.00 |
| 328 – Fixed roof tanks – working losses | 0.00 | 0.00 |
| 332 – Pressure tanks | 0.00 | 0.00 |
| 338 – Cooling towers | 0.00 | 0.00 |
| 408 – Wine fermentation | 0.01 | 0.00 |
| 410 – Wine aging | 0.12 | 0.00 |
| 412 – Bakeries | 0.38 | 0.00 |
| 414 – Breweries | 0.03 | 0.00 |
| 418 – Agricultural products processing losses | 0.01 | 0.03 |
| 420 – Agricultural crop processing losses | 0.02 | 0.00 |

| Source Category | VOC (tpd) | NOx (tpd) |
|------------------------------------|-------------|-------------|
| 995 – Other (food and agriculture) | 0.02 | 0.00 |
| Total | 0.58 | 0.03 |

*Totals may not sum due to rounding

b. Evaluation

Staff reviewed control measures for this source category implemented by South Coast AQMD and other state and local air agencies. Each jurisdiction has different rule structures, which can make direct comparison difficult. Table 4-73 summarizes the control measures staff considered for this source category.

**TABLE 4-73
FOOD AND AGRICULTURE CONTROL MEASURES IMPLEMENTED BY SOUTH COAST AQMD AND OTHER DISTRICTS**

| Rule | Applicability | Control Measure |
|--|--|---|
| South Coast AQMD Rule 1153 – Commercial Bakery Ovens (Amended 1/13/95) | This rule controls volatile organic compound (VOC) emissions from commercial bakery ovens with a rated heat input capacity of 2 million BTU per hour or more and with an average daily emissions of 50 pounds or more of VOC | VOC emissions must be reduced at least: <ul style="list-style-type: none"> • (A) 70% by weight (as carbon) for an oven with a base year average daily VOC emissions of 50 pounds or more, but less than 100 pounds • (B) 95% by weight (as carbon) for an oven with a base year average daily VOC emissions of 100 pounds or more |
| South Coast AQMD Rule 1131 – Food Product Manufacturing and Processing Operations (Amended 6/6/03) | The purpose of this rule is to reduce emissions of VOC from solvents used in food product manufacturing and processing operations. This rule applies to any person using solvents in any food product manufacturing and processing operation except food supplements in tablet or capsule form. However, exemptions to the rule include: <ul style="list-style-type: none"> • Fermentation operations in breweries, wineries, or distilleries | <ul style="list-style-type: none"> • Reduce emissions of isopropyl alcohol and hexane from food manufacturing and processing operations such as extraction, blending, separation, crystallization, and drying. The current rule sets VOC concentration limits on both manufacturing processes and sterilization of the equipment used to manufacture and process food products, or allows the use of add-on control equipment to capture and destroy VOC emissions at a minimum of 85.5% |
| AVAQMD Rule 1153 – Commercial Bakery Ovens (Amended 1/13/95) | This rule controls volatile organic compound (VOC) emissions from commercial bakery ovens with a rated heat input capacity of 2 million BTU per hour or more and with an average | See requirements above for South Coast AQMD Rule 1153 |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Rule | Applicability | Control Measure |
|--|---|--|
| | daily emission of 50 pounds or more of VOC | |
| SJVAPCD Rule 4693 – Bakery Ovens (Adopted 5/16/02) | The requirements of this rule shall apply to bakery ovens operated at major source facilities, which emit VOC during the baking of yeast-leavened products | <p>No person shall operate a new or existing bakery oven unless:</p> <ul style="list-style-type: none"> • Emissions from all oven stacks are vented to an emission collection system, and • The collected emissions are vented to an approved emission control device, which has a control efficiency of at least 95% |
| SJVAPCD Rule 4694 – Wine Storage and Fermentation Tanks (Adopted 12/15/05) | This rule applies to any winery fermenting wine and/or storing wine in bulk containers equal to or greater than 5,000 gallons. Wineries with bulk containers containing over 5,000 gallons AND with baseline fermentation emissions less than 10 tons per year, and wood or concrete wine storage tanks are exempted. | <ul style="list-style-type: none"> • Winery Fermentation Tanks Operators shall achieve Required Annual Emissions Reductions (RAER) equal to at least 35% of the winery’s Baseline Fermentation Emissions (BFE) • Storage Tanks Operators of any wine storage tank having an internal volume equal to or greater than 5,000 gallons shall: Have a pressure-vacuum relief valve meeting all of the following requirements: <ul style="list-style-type: none"> • The pressure-vacuum relief valve shall operate within 10% of the maximum allowable working pressure of the tank • The pressure-vacuum relief valve shall be permanently labeled with the operating pressure settings. • The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition except when the operating pressure of the tank exceeds the valve set pressure • The temperature of the stored wine shall be maintained at or below 75°F and are recorded at least once per week • For each batch of wine, operators shall achieve the storage temperature of 75°F or less within 60 days after completing fermentation |

| Rule | Applicability | Control Measure |
|---|---|--|
| <p>SJVAPCD Rule 4695 – Brandy Aging and Wine Aging Operations (Adopted 9/17/09)</p> | <p>The purpose of this rule is to limit volatile organic compound (VOC) emissions from brandy aging and wine aging operations</p> | <p>Implement the following RACT work practices:</p> <ul style="list-style-type: none"> • Prevent and minimize the unnecessary occurrence of brandy or wine exposure to the atmosphere, and leaks and spills • Immediate clean-up of leaks and spills • Preventative actions for reoccurrence of a similar brandy or wine leak or spill <p>A Stationary Source with a wine aging operation that equals or exceeds rule applicable inventory and emission thresholds shall also comply with the RACT work practices:</p> <ul style="list-style-type: none"> • Maintain the wine aging warehouse such that the daily average temperature, averaged over a calendar year, does not exceed 70°F, or • Implement a control technology to reduce the Uncontrolled Aging Emissions (UAE), as defined in the rule • With a brandy aging operation that equals or exceeds both the rule applicable inventory and emission thresholds, operator shall implement BARCT to produce a brandy with UAE of less than or equal to 0.3 proof gallons per 50 gallons • Aging wine shall be maintained at or below 75°F during aging operations |
| <p>SBCAPCD Rule 802.D.2 – New Source Review – Nonattainment Review BACT Requirement (Revised 8/25/16)</p> | <p>Wine stored in oak barrels. Low production wineries may qualify for a written determination of exemption if the annual emissions of ethanol are less than 1 ton per year (approximately less than 25,000 barrels a year)</p> | <ul style="list-style-type: none"> • Permits are required for fermentation and storage tanks, including vats, along with annual winery reporting requirements |
| <p>SDAPCD Rule 67.24 – Bakery Ovens (Adopted & Effective 5/15/96)</p> | <p>Applicable to bakery ovens which emit VOC during the baking of yeast-</p> | <ul style="list-style-type: none"> • No person shall operate a bakery oven subject to this rule, unless the |

| Rule | Applicability | Control Measure |
|--|--|--|
| | leavened products. Excludes bakery ovens: <ul style="list-style-type: none"> • with combined rated heat input capacity of all bakery ovens is less than 2 MMBTU/hr, • baking of unleavened products, or • uncontrolled emissions of VOC from all bakery ovens is less than 50 TPY | uncontrolled VOC emissions are reduced by at least 90% by weight |
| SMAQMD Rule 458 – Large Commercial Bread Bakeries (Amended 9/5/96) | Limits emission of VOC from bread ovens at large commercial bread bakeries, except for bakeries whose total VOC emissions for each and every operating day are less than 100 pounds, or bakery products leavened chemically in the absence of yeast | <ul style="list-style-type: none"> • All ovens shall vent emissions to an emission control system that captures emissions from all oven stacks which has a control efficiency of at least 95% on a mass basis |

The control measures identified for agricultural and food processing sources rely on limiting the emissions of VOC from fermentation of yeast for both baking and fermentation operations, along with limiting emissions of VOC from other food manufacturing and processing operations.

Rule 1153 controls VOC emissions from commercial bakery ovens with a rated heat input capacity of 2 million BTU per hour or more and with average daily VOC emissions of 50 pounds or more. VOC emissions must be reduced by 70 percent by weight as carbon for an oven with base year average daily VOC emissions of 50 pounds or more, but less than 100 pounds. VOC emissions must be reduced by at least 95 percent by weight as carbon for an oven with average daily VOC emissions of 100 pounds or more. SDAPCD Rule 67.24 requires bakery ovens with average daily uncontrolled VOC emissions of 50 pounds or more to be reduced by at least 90 percent by weight, and SJVAPCD Rule 4693 requires a 95 percent VOC reduction. These rules are more stringent than South Coast AQMD Rule 1153 for facilities with ovens that emit average daily VOC emissions between 50 to 100 pounds.

Staff considered a potential contingency measure in Rule 1153 to increase the required minimum control efficiency for ovens that emit average daily VOC emissions between 50 to 100 pounds. However, the impacted facilities would need to upgrade their emission control systems to increase the VOC control efficiency from 70 to 95 percent. The development and installation of new control systems would require more than two years to implement. Contingency measures that do not achieve reductions within two years of being triggered are inconsistent with the guidelines specified in U.S. EPA’s guidance. Therefore, staff does not propose a contingency measure in Rule 1153.

Rule 1131 applies to food product manufacturing and processing operations. Past emission inventory work on several District projects and other information from inspectors led to the discovery of large

amounts of solvent usage (primarily isopropyl alcohol) at several food manufacturing facilities. Food products are considered to be any combination of carbohydrates, proteins, or fats intended for human consumption. Colorings, flavorings, spices, and extracts that are manufactured and subsequently used in the preparation of human consumable foods are considered food products. Food processing and manufacturing operations include, but are not limited to distillation, extraction, reacting, blending, drying, crystallizing, granulating, separation, sterilization, and filtering. Exemptions to the rule include operations at breweries, wineries, or distilleries, and deep-fat frying operations; however, other general District rules such as Rule 201 – Permit to Construct and Rule 203 – Permit to Operate, require that units that may cause issuance of air contaminants or units used to control pollutants to be permitted. Additionally, new, relocated, or modified wineries are subject to BACT; VOC or other contaminants need to be controlled if emissions are greater than 1 pound per day. Similarly, SBCAPCD does not have winery specific rules, but require wine storage tanks under 30,000 gallons to be permitted.

Overall, staff identified two wine production/fermentation/storage/aging related VOC control measures implemented in SJVAPCD (Rule 4694 – Wine Storage and Fermentation, and Rule 4695 – Brandy Aging and Wine Aging Operations) that are not covered under South Coast AQMD rules. SJVAPCD Rule 4694 implements relief pressure valve requirements and at least 35 percent annual emissions reductions. SJVAPCD Rule 4695 implements various BMPs for storage tanks and reduces emissions by at least 50 percent. Both of these rules also require temperature of stored wine or brandy to be lower than 75°F and for Rule 4695, the daily average temperature of the wine aging warehouse, averaged over a calendar year, is maintained at or does not exceed 70°F, along with some recordkeeping requirements. There are currently no source-specific rules that apply to wine production and related operations in South Coast Air Basin.

c. Conclusion

South Coast AQMD’s rules for food and agriculture are generally comparable to rules in other air districts. However, South Coast AQMD does not have any rules that directly apply to VOC emissions from wine storage tanks or wine and brandy aging. While nominal VOC emissions associated with wine fermentation and aging are present in the Basin, it is likely that wineries already implement many of the requirements of SJVAPCD Rules 4694 and 4695. For example, it is unlikely that aging is performed at temperatures exceeding 70°F as this would produce poor quality wine. For this reason, virtually all wineries employ climate-control systems. Since such measures are already being implemented in practice, no emission reductions would result from a potential contingency measure to align with SJVAPCD’s rules. Therefore, no contingency measure is proposed for this source category.

3. Mineral Processes

a. Overview

Major source category 430 – Mineral Processes accounts for 0.46 tpd of VOC and 0.47 tpd of NO_x emissions in 2037. Emissions of VOC by process are shown in Table 4-74.

**TABLE 4-74
MINERAL PROCESSES EMISSIONS BASED ON 2037 SUMMER PLANNING INVENTORY**

| Description | VOC (tpd) | NOx (tpd) |
|---|-------------|-------------|
| 326 – Fixed roof tanks – breathing losses | 0.00 | 0.00 |
| 328 – Fixed roof tanks – working losses | 0.00 | 0.00 |
| 338 – Cooling towers | 0.00 | 0.00 |
| 422 – Sand and gravel excavation and processing | 0.00 | 0.00 |
| 424 – Asphaltic concrete production | 0.21 | 0.03 |
| 426 – Crushed stone excavation and processing | 0.00 | 0.00 |
| 428 – Surface blasting | 0.00 | 0.00 |
| 429 – Cement (Portland and others) manufacturing | 0.00 | 0.00 |
| 430 – Cement concrete manufacturing and fabrication | 0.04 | 0.09 |
| 432 – Gypsum manufacturing | 0.01 | 0.06 |
| 434 – Lime manufacturing | 0.00 | 0.00 |
| 436 – Storage piles | 0.00 | 0.00 |
| 995 – Other (mineral processes) | 0.19 | 0.28 |
| Total* | 0.46 | 0.47 |

*Totals may not sum due to rounding.

The VOC emissions from asphaltic concrete production facilities typically originate from non-combustion sources that include storage silos, aggregate conveyors and hot elevators, and truck load-out operations. VOC emission factors for those sources at hot mix asphalt plants are discussed in the AP-42 database.⁶² These are fugitive emissions resulting from the movement of asphaltic concrete through its processing, and no control measure for such fugitive emissions was identified.

The VOC emissions in the Other (mineral processes) sub-category are attributable to point source facilities, namely asphalt roofing and coating companies. Staff examined the facility permits and found that the VOC emissions are due to storage tanks containing asphalt and petroleum distillate. Tanks that have a volume of 75,000 liters or more are subject to Rule 463, evaluated under Petroleum Production and Marketing – Storage Tanks and Related Losses. The NOx emissions are similarly attributable to point sources, including refineries, industrial gas production facilities, and glass melting facilities. South Coast AQMD Rule 1117 – Emissions from Container Glass Melting and Sodium Silicate Furnaces was identified as applicable and is further evaluated below.

⁶² AP 42, Fifth Edition, Volume I Chapter 11: Mineral Products Industry. Section 11.1 Hot Mix Asphalt Plants. Available at: <https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-fifth-edition-volume-i-chapter-11-mineral-products-0>

Cement, concrete, and gypsum manufacturing are the only other sub-categories contributing emissions in the mineral processes category. South Coast AQMD Rule 1112 – Emissions of Oxides of Nitrogen from Cement Kilns was identified as applicable to the Cement Concrete Manufacturing and Fabrication category and is further evaluated in this section, but there was no source-specific NOx or VOC rule identified for the remaining categories.

b. Evaluation

There are numerous rules that address controls of PM emissions from these facilities, but staff did not identify any source-specific South Coast AQMD control measure or rule related to VOC emissions. However, sources in this category are subject to the general VOC limits in Rule 442 (evaluated under Cleaning and Surface Coatings – Degreasing) and Rule 463 (evaluated under Petroleum Production and Marketing - Storage Tanks and Related Losses). Relevant regulations in other jurisdictions were explored. As in South Coast AQMD, there are several rules that apply to PM emissions, but there are no rules to control VOC emissions from those sources.

South Coast AQMD Rule 1117 is applicable to glass melting facilities which are included in the mineral processes source category. Comparable rules in other districts include SJVAPCD Rule 4354 and BAAQMD Rule 9-12 which are evaluated below in Table 4-75. Emission limits are expressed as pounds of pollutant per ton of product produced.

**TABLE 4-75
SOUTH COAST AQMD RULE 1117 COMPARATIVE ANALYSIS**

| | South Coast AQMD Rule 1117 – Emissions from Oxides of Nitrogen from Glass Melting Furnaces (Amended 6/5/20) | BAAQMD Rule 9-12 – Nitrogen Oxides from Glass Melting Furnaces (Adopted 1/19/94) | SJVAPCD Rule 4354 – Glass Melting Furnaces (Amended 12/16/21) |
|---------------------------------|---|---|---|
| Applicability | This rule limits the emission of NOx from facilities producing container glass and sodium silicate | This Rule limits the emission of NOx from glass melting furnaces | Any glass melting furnace for the production of, container glass, fiberglass, and flat glass |
| Exemptions | <ul style="list-style-type: none"> Furnaces which are limited by permit to 100 tons of product pulled per calendar year Glass remelt facilities using exclusively glass cullet, marbles, chips, or similar feedstock in lieu of basic glass-making raw materials. Furnaces used in the melting of glass for the production of fiberglass exclusively | <ul style="list-style-type: none"> Furnaces in which all the heat required for melting is provided by electric current from electrodes submerged in the molten glass, except that heat may be supplied by fossil fuels for start-up when the furnace contains no molten glass Furnaces with a production capacity of 4550 kilograms (5 short tons) of glass per day or less | <ul style="list-style-type: none"> Furnaces which heat is provided by electric current from electrodes |
| Container Glass Emission Limits | <ul style="list-style-type: none"> NOx Limit of 0.75 lb/ton, averaged over a 30-day rolling period | <ul style="list-style-type: none"> NOx Limit of 5.5 lb/ton, averaged over any consecutive three-hour period excluding start-up, shutdown, and idling periods | <ul style="list-style-type: none"> NOx Limits <ul style="list-style-type: none"> 0.75 lb/ton, averaged over a 30-day rolling period VOC Limits <ul style="list-style-type: none"> 100% air-fired: 20 ppmv @ 8% O2 (based on 3 hr avg) oxy-fuel/oxygen: 0.25 lb/ton (based on 3 hr avg) |
| Sodium Silicate Emission Limits | <ul style="list-style-type: none"> NOx Limit of 0.50 lb/ton, averaged over a 30-day rolling period | None specified | None specified |

Other districts' rules have emission limits applicable to flat glass and fiberglass manufacturers. However, there are only two facilities subject to South Coast AQMD Rule 1117 - one container glass manufacturer and one sodium silicate manufacturer. Thus, limits for other types of glass manufacturing are not considered in Table 4-75.

SJVAPCD Rule 4354 establishes VOC limits for container glass furnaces, which are not addressed in Rule 1117 since the primary focus of Rule 1117 is to regulate NOx emissions. Facilities subject to Rule 1117 have installed SCR technology with ceramic filter elements to comply with its requirements. Evaluation of SJVAPCD Rule 4354 found that facilities in the Valley have implemented similar control technologies.⁶³ While it is possible that glass melting furnaces in the Basin already comply with the VOC limits specified in Rule 4354, staff determined that installing additional control technology within the two-year implementation timeframe for contingency measures is not feasible. Control technology typically requires extended lead times for design, manufacturing, installation, and testing before becoming operational. Therefore, if additional controls are needed to meet the VOC limits in Rule 4354, it would be infeasible to implement as a contingency measure.

South Coast AQMD Rule 1112 – Emissions of Oxides of Nitrogen from Cement Kilns regulates NOx emissions from cement kilns used to manufacture gray cement. The NOx emission limits in Rule 1112 are compared to those in analogous rules at other agencies, including BAAQMD Rule 9-13, MDAQMD Rule 1161, and EKAPCD Rule 425.3 in Table 4-76.

⁶³ SJVAPCD, Rule 4353 Glass Melting Furnaces, December 16, 2021.
<https://ww2.valleyair.org/media/gpaj23xy/rule-4354.pdf>

**TABLE 4-76
SOUTH COAST AQMD RULE 1112 COMPARATIVE ANALYSIS**

| Rule Element | South Coast AQMD Rule 1112 – Emissions of Oxides of Nitrogen from Cement Kilns (Amended 6/6/86) | BAAQMD Rule 9-13 – Nitrogen Oxides, Particulate Matter, and Toxic Air Contaminants from Portland Cement Manufacturing (Amended 10/19/16) | MDAQMD Rule 1161 – Portland Cement Kilns (Amended 1/22/18) | EKAPCD Rule 425.3 – Portland Cement Kilns (Oxides of Nitrogen) (Amended 11/13/24) |
|---------------------|---|---|--|---|
| Applicability | Cement kilns for calcining and clinkering limestone, clay, and other raw materials to produce gray cement | Manufacturers of Portland cement | All existing Portland cement kilns operated within the ozone non-attainment area of MDAQMD | All Portland cement manufacturing facilities |
| Exemptions | Startup, shutdown, or breakdown conditions | - | Startup and shutdown | Startup, shutdown, and breakdown conditions |
| NOx emission limits | <p>A gray cement kiln shall not be operated unless discharge of NOx into atmosphere is limited to no more than:</p> <ul style="list-style-type: none"> • 11.6 lb/ton of clinker produced, averaged over 24 consecutive hour period, and • 6.4 lb/ton of clinker produced, averaged over 30 consecutive day period | The 30-operating day rolling average of NOx emissions from the kiln at a Portland cement manufacturing facility shall not exceed 2.3 lb/ton of clinker produced | <p>NOx limits except Start-up and Shut-down periods:</p> <ul style="list-style-type: none"> • For Preheater-Recalciner Kilns: 2.8 lb/ton of clinker produced when averaged over any 30 consecutive day period; or • For a Portland cement kiln operating with over 15% of heat input from any combination of low-carbon fuels: 3.4 lb/ton of clinker produced when averaged over any 30 consecutive day period | <p>NOx emissions from the kiln at Portland cement manufacturing facility shall not exceed the 30-operating day rolling average limit as follows:</p> <ul style="list-style-type: none"> • 2.8 lb/ton of clinker produced over a 30 operating day rolling average |

Rule 1112 specifies NOx emission limits for gray cement kilns of 11.6 lb/ton of clinker produced over a 24-hour period and 6.4 lb/ton of clinker produced over a 30 day period. In comparison, BAAQMD Rule 9-13 requires a NOx emission limit of 2.3 lb/ton of clinker produced over a 30 operating day period. Both MDAQMD and EKAPCD have similar requirements. MDAQMD Rule 1161 requires a NOx limit of 2.8 lb/ton of clinker produced, averaged over any 30 consecutive day period for Preheater-Recalciner Kilns. For a Portland cement kiln combusting low-carbon fuels, a NOx limit of 3.4 lb/ton of clinker produced is required. EKAPCD Rule 425.3 requires a NOx limit of 2.8 lb/ton of clinker produced.

The NOx limits in Rule 1112 are less stringent than those in other districts’ rules. Staff considered a potential contingency measure to lower the NOx limits in Rule 1112. However, ultra-low NOx burners or advanced post-combustion control devices would be needed to achieve lower NOx emissions from cement kilns. This would not be a suitable contingency measure considering that it would be technologically infeasible to design, install, test, and operate advanced emission control technology within two years of the triggering event.

c. Conclusion

Staff does not propose any contingency measures for this category of units, primarily due to the technological infeasibility of implementing the potential measures within two years of the triggering event.

4. Metal Processes

a. Overview

Major source category 440 – Metal Processes includes secondary metal production, metal plating and coating operations, and other unspecified industrial processes that involve mineral and metal products, aluminum, iron, and steel. Sources in this category account for 0.34 tpd of NOx and 0.12 tpd of VOC emissions in 2037 as shown in Table 4-77. Metal melting, metal heat treating, metal heating, and metal forging furnaces are the primary sources of NOx emissions in this category. Metal plating and coating also emit NOx. NOx emissions can be produced as a byproduct from metal treatment processes where nitric acid is used as an oxidant. For example, plating or catalyst recovery involves the reaction of nitric acid and transition metals and emits NOx.

**TABLE 4-77
METAL PROCESSES EMISSIONS BASED ON 2037 SUMMER PLANNING INVENTORY**

| Description | VOC (tpd) | NOx (tpd) |
|--|-----------|-----------|
| 326 – Fixed roof tanks – breathing losses | 0.00 | 0.00 |
| 328 – Fixed roof tanks – working losses | 0.00 | 0.00 |
| 338 – Cooling towers | 0.00 | 0.00 |
| 440 – Secondary metal production | 0.00 | 0.00 |
| 444 – Metal plating and coating operations | 0.02 | 0.10 |
| 995 – Other (metal processes) | 0.10 | 0.24 |

| Description | VOC (tpd) | NOx (tpd) |
|-------------|-----------|-----------|
| Total | 0.12 | 0.34 |

b. Evaluation

Staff reviewed control measures established for this source category by South Coast AQMD, SJVAPCD, BAAQMD, VCAPCD, Great Basin Unified APCD (GBUAPCD), and Amador County Air District. South Coast AQMD Rule 1147.2 regulates NOx emissions from metal melting, metal heat treating, and metal heating and forging furnaces that are operated at non-RECLAIM, RECLAIM, and former RECLAIM facilities, requiring a South Coast AQMD permit. Staff also evaluated applicable NOx concentration limits in other air districts' rules, summarized in Table 4-78. Rule 1147.2 has more stringent NOx concentration limits ranging from 15 to 60 ppm for metal melting, heating, forging, and treating furnaces. Note that there are zero NOx and VOC emissions from chrome plating and coating operations and thus, South Coast AQMD Rule 1169 – Hexavalent Chromium - Chrome Plating and Chromic Acid Anodizing, and similar rules in other jurisdictions were not considered in this evaluation.

TABLE 4-78
SOUTH COAST AQMD Rule 1147.2 COMPARATIVE ANALYSIS

| | South Coast AQMD Rule 1147.2 – NO _x Reductions from Metal Melting and Heating Furnaces (Adopted 4/1/22) | VCAPCD Rule 74.34 – NO _x Reductions from Miscellaneous Sources (Adopted 12/13/16) | GBUAPCD Rule 404-B – Oxides of Nitrogen (Amended 5/8/96) | BAAQMD Rule 9-3 – Nitrogen Oxides from Heat Transfer Operations (Amended 3/17/82) | Amador County Air District Regulation II, SIP Rule 19 – Fuel Burning Equipment (Adopted 9/14/71) | SJVAPCD Rule 4301 – Fuel Burning Equipment (Amended 12/17/92) |
|-----------------|---|--|--|--|--|---|
| Applicability | Applies to non-RECLAIM, RECLAIM, and former RECLAIM facilities that operate metal melting, metal heat treating, and metal heating and forging furnaces that require a South Coast AQMD permit | Applies to metal heat treating and metal melting furnaces | Applies to combustion equipment | Heat transfer operations | Non-mobile fuel burning equipment | Applies to fuel burning equipment |
| Control Measure | <p>NO_x limits for existing units For unit size <40 MMBtu/hr:</p> <ul style="list-style-type: none"> • Metal melting furnace: 40 ppm • Metal heat treating, metal heating, and metal forging: <ul style="list-style-type: none"> • ≤1,200°F: 40 ppm • >1,200°F: 50 ppm • Units with radiant-tube burners: 50 ppm <p>For unit size ≥40 MMBtu/hr: 15 ppm</p> <p>Alternative NO_x limits for existing units For unit size <40 MMBtu/hr:</p> <ul style="list-style-type: none"> • Metal melting furnace: 50 ppm • Metal heat treating, metal heating, and metal forging: <ul style="list-style-type: none"> • ≤1,200°F: 50 ppm | 60 ppm NO _x at 3% O ₂ | <ul style="list-style-type: none"> • 125 ppm with natural gas fuel • 225 ppm with liquid or solid fuel | <ul style="list-style-type: none"> • Existing heat transfer operation limits 175 ppm NO_x when gaseous fuel is burned • New or modified heat transfer operation limits 125 ppm NO_x when natural gas is burned | <ul style="list-style-type: none"> • 140 lbs/hr NO_x | <ul style="list-style-type: none"> • 140 lbs/hr NO_x |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| | South Coast AQMD Rule 1147.2 – NOx Reductions from Metal Melting and Heating Furnaces (Adopted 4/1/22) | VCAPCD Rule 74.34 – NOx Reductions from Miscellaneous Sources (Adopted 12/13/16) | GBUAPCD Rule 404-B – Oxides of Nitrogen (Amended 5/8/96) | BAAQMD Rule 9-3 – Nitrogen Oxides from Heat Transfer Operations (Amended 3/17/82) | Amador County Air District Regulation II, SIP Rule 19 – Fuel Burning Equipment (Adopted 9/14/71) | SJVAPCD Rule 4301 – Fuel Burning Equipment (Amended 12/17/92) |
|--|---|--|--|---|--|---|
| | <ul style="list-style-type: none"> • >1,200°F: 60 ppm • Units with radiant-tube burners: 60 ppm <p>NOx limits for new units For unit size <40 MMBtu/hr:</p> <ul style="list-style-type: none"> • Metal heat treating, metal heating, and metal forging: <ul style="list-style-type: none"> • ≤1,200°F: 30 ppm • >1,200°F: 40 ppm • Units with radiant-tube burners: 40 ppm <p>For unit size ≥40 MMBtu/hr: 15 ppm (All NOx limits above are corrected to 3% O2)</p> | | | | | |

South Coast AQMD Rule 1159.1 applies to nitric acid tanks used in metal finishing, precious metal reclamation, or expanded graphite foil production operations. NOx is emitted due to either the reaction of nitric acid with a metal or decomposition of nitric acid at high temperatures. Table 4-79 provides a summary of key requirements in Rule 1159.1. However, staff did not identify any regulations comparable to Rule 1159.1 at the local, state, or federal level, indicating that South Coast AQMD is leading the effort to reduce emissions from this type of process, so further evaluation was not performed.

**TABLE 4-79
SOUTH COAST AQMD RULE 1159.1 SUMMARY**

| Rule 1159.1 – Control of NOx Emissions from Nitric Acid Tanks (Adopted 12/6/24) | |
|---|--|
| Applicability | Owners and/or operators of facilities with one or more Nitric Acid Units, defined as tanks, reactors, vessels, or other containers containing nitric acid, where nitric acid either reacts with a metal or decomposes at a temperature greater than 1,700°F, that has been issued or is required to obtain a South Coast AQMD permit |
| Exemptions | <ul style="list-style-type: none"> • Cleaning Tanks, defined as a tank containing nitric acid used to remove surface contaminants from parts where nitric acid is not intended to react with a metal |
| Requirements | <ul style="list-style-type: none"> • Nitric Acid Units must be vented to an Air Pollution Control Device (APCD) that: <ul style="list-style-type: none"> • Achieves an overall NOx emissions rate from the combined Nitric Acid Unit(s) vented to the APCD at or below 0.30 pounds per hour (lb/hr). In no case can the combined NOx emissions rate for all Nitric Acid Units at the facility exceed 0.90 lb/hr; or • Achieves a NOx control efficiency of 99% • Alternative Compliance Pathway: in lieu of complying with the APCD requirements above, an operator must: <ul style="list-style-type: none"> • Demonstrate that all Nitric Acid Unit(s) at the facility do not exceed an overall NOx emissions rate of 0.60 lb/hr; and • Not process a part containing a metal or metal alloy in a Nitric Acid Unit unless all metal(s) with 10.5 percent or greater of the part have been evaluated by an approved source test that demonstrates compliance with the overall NOx emissions rate of 0.60 lb/hr |

c. Conclusion

Staff reviewed the available control measures for the metal processes category and found that the available measures are already being implemented in the Basin. Therefore, no contingency measures are proposed for this source category.

5. Wood and Paper

a. Overview

Major source category 450 – Wood and Paper includes emissions from sawmills, woodworking, pulp and paper manufacturing, and paperboard/fiberboard manufacturing, and other related processes. Paper and paperboard manufacturing facilities are the only sources accounting for 0.26 tpd of VOC and zero NOx emissions in the Basin’s 2037 summer planning emissions inventory summarized in Table 4-80.

**TABLE 4-80
WOOD AND PAPER EMISSIONS BASED ON 2037 SUMMER PLANNING INVENTORY**

| Description | VOC (tpd) | NOx (tpd) |
|---|-------------|-------------|
| 338 – Cooling towers | 0.00 | 0.00 |
| 450 – Pulp and paper manufacturing | 0.21 | 0.00 |
| 452 – Paperboard/fiberboard manufacturing | 0.04 | 0.00 |
| 456 – Sawmill/woodworking operations | 0.00 | 0.00 |
| 995 – Other (wood and paper) | 0.00 | 0.00 |
| Total | 0.26 | 0.00 |

*Totals may not sum due to rounding.

b. Evaluation

There is a rule that addresses control of PM emissions from this source category, but staff did not identify any source-specific South Coast AQMD control measure or rule related to VOC emissions from these facilities. However, sources in this category are subject to the general VOC limits in Rule 442 (evaluated under Cleaning and Surface Coatings – Degreasing). Staff explored relevant regulations in other jurisdictions. As in South Coast AQMD, there are rules that apply to PM emissions, but there are no rules to control VOC emissions from these sources.

c. Conclusion

Staff reviewed the available control measures for the wood and paper category and found that the available measures are already being implemented in the Basin. Therefore, no contingency measures are proposed for this source category.

6. Glass and Related Products

No NOx or VOC emissions are reported from source category 460 – Glass and Related Products in the 2037 Basin emissions inventory. Therefore, this source category was not evaluated.

7. Electronics

a. Overview

Major source category 470 – Electronics accounts for 0.02 tpd of VOC emissions and zero NOx emissions in the Basin’s 2037 summer planning inventory as shown in Table 4-81. Semiconductor manufacturing, regulated by South Coast AQMD Rule 1164, is the only process that has emissions in this source category.

**TABLE 4-81
ELECTRONICS EMISSIONS BASED ON 2037 SUMMER PLANNING INVENTORY**

| Description | VOC (tpd) | NOx (tpd) |
|---|-------------|-------------|
| 326 – Fixed roof tanks – breathing losses | 0.00 | 0.00 |
| 328 – Fixed roof tanks – working losses | 0.00 | 0.00 |
| 338 – Cooling towers | 0.00 | 0.00 |
| 440 – Secondary metal production | 0.00 | 0.00 |
| 470 – Semiconductor manufacturing | 0.02 | 0.00 |
| Total | 0.02 | 0.00 |

b. Evaluation

The only other air district regulation staff identified as applicable to semiconductor manufacturing is BAAQMD Rule 8-30. Table 4-82 compares the VOC control measures for semiconductor manufacturing. In both districts’ rules, VOC control measures consist of leak detection and repair, best management practices, and venting emissions to a control device. The requirements in BAAQMD Rule 8-30 are generally similar to those in South Coast AQMD Rule 1164.

**TABLE 4-82
SOUTH COAST AQMD RULE 1164 COMPARATIVE ANALYSIS**

| | South Coast AQMD Rule 1164 – Semiconductor Manufacturing (Amended 1/13/95) | BAAQMD Rule 8-30 – Semiconductor Wafer Fabrication Operations (Amended 10/7/98) |
|---------------|---|---|
| Applicability | Direct, indirect, and support stations associated with the manufacture or production of semiconductor devices | Semiconductor wafer fabrication operations are limited to the manufacture of semiconductor and other related integrated circuits |
| Exemptions | <ul style="list-style-type: none"> Facilities that produce less than five pounds of total VOC emissions over any continuous 24-hour period | <ul style="list-style-type: none"> Facilities whose total combined consumption of solvent-based photoresist and solvent-based photoresist developer is less than 24 gallons per month on a facility wide basis are exempt from photoresist requirements Low volatility compounds Solvent cleaning devices with a capacity greater than 10 gallons Photoresist developers, strippers and cleaning solvents containing less than 10% VOC by weight if |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| | South Coast AQMD Rule 1164 – Semiconductor Manufacturing (Amended 1/13/95) | BAAQMD Rule 8-30 – Semiconductor Wafer Fabrication Operations (Amended 10/7/98) |
|--------------------------------------|---|--|
| Equipment and Operating Requirements | <p>Solvent Cleaning Stations</p> <ul style="list-style-type: none"> • All reservoirs, sinks, tanks and containers which transfer, store, or hold VOC-containing material shall be provided with a full cover or an approved emission control system • All reservoirs and sinks holding fluids with a VOC composite partial pressure of 33 mm Hg or less at 68°F, shall have a freeboard ratio greater than or equal to 1.0, or be equipped with an approved emission control system • Solvent flow of VOC-containing materials shall be applied in a continuous unbroken stream and in a manner which shall prevent liquid loss resulting from splashing • Liquid solvent leaks of 3 drops per minute or more shall be repaired within 24 hours of detection or the equipment shall be shut down until replaced or repaired <p>Photoresist Operations</p> <ul style="list-style-type: none"> • VOC must be vented to an emission control system <p>Cleanup Solvents</p> <ul style="list-style-type: none"> • Material requirements: <ul style="list-style-type: none"> • VOC content limit of 200 g/L; or • VOC composite partial pressure shall not exceed 33 mm Hg at a temperature of 68°F; or • Components being cleaned must be totally enclosed during the washing, rinsing, and draining processes; or • Cleanup solvents must be flushed or drained in a manner that does not allow evaporation into the atmosphere • Storage, transfer, and disposal requirements: <ul style="list-style-type: none"> • Nonabsorbent, closed containers must be used | <p>unheated, or less than 2.5% VOC by weight if heated</p> <p>Solvent Sinks</p> <ul style="list-style-type: none"> • All sinks containing VOC shall be provided with a full cover or an approved emission control system • VOC-containing materials shall not be stored or disposed of in a manner that will allow evaporation into the atmosphere • Liquid solvent leaks shall be repaired immediately or the equipment shall be shut down • All unheated solvent sinks containing VOC with a vapor pressure higher than 30 mm Hg at 20°C and all heated solvent sinks shall have a freeboard ratio greater than or equal to 0.75, unless either: <ul style="list-style-type: none"> • The sink capacity does not exceed 1 liter; or • The sink is abated by an emission control device <p>Photoresist Operations</p> <ul style="list-style-type: none"> • VOC must be vented to an emission control system <p>Solvent Spray and Vapor Stations</p> <ul style="list-style-type: none"> • Must operate in a sealed enclosure unless abated by an emission control device • Liquid solvent leaks shall be repaired immediately or the equipment shall be shut down • The station shall not have VOC emissions which exceed 250 lb/month per station unless abated by an emission control device <p>Fabrication Areas</p> <ul style="list-style-type: none"> • Wipe cleaning of fab areas with a solution containing more than 10% VOC by weight is prohibited |
| Emission control system requirements | <ul style="list-style-type: none"> • Requires an overall control efficiency of at least 90% | <ul style="list-style-type: none"> • Requires an overall control efficiency of at least 90% |

c. Conclusion

Staff reviewed the available control measures for the electronics category and found that the available measures are already being implemented in the Basin. Therefore, no contingency measures are proposed for this source category.

8. Other (Industrial Processes)

a. Overview

Based on the 2037 baseline emissions inventory for the South Coast Air Basin, source category 499 – Other Industrial Processes accounts for 5.37 tpd of VOC and 0.03 tpd of NO_x emissions. The emissions are summarized in Table 4-83. The VOC emissions from roof tanks are controlled by Rule 463, evaluated under the Storage Tanks and Related Losses section of Petroleum Production and Marketing.

Processes under Industrial Use account for 2.11 tpd of VOC and are associated with area sources that employ metalworking fluids and lubricants. South Coast AQMD Rule 1144, evaluated under Cleaning and Surface Coatings – Other, is applicable to these area sources.

Finally, facilities reporting VOC and NO_x emissions under the Other Industrial Processes category include, but are not limited to, metal forging, petroleum and coal products, utilities, glass containers, breweries, sewage treatment, chemical manufacturing and food preparation. In total, there are over 150 unique point sources included in this source category with no contribution from area sources. Due to the large quantity and variety of facilities, it is impractical to analyze each one to identify applicable rules based on their equipment inventory. However, control measures applicable to these facilities are likely evaluated under other source categories. For example, chemical manufacturing facilities with organic liquid storage tanks are subject to Rule 463, evaluated under Petroleum Production and Marketing. Similarly, metal forging facilities are subject to Rule 1147.2, evaluated under Metal Processes, and commercial bakeries are subject to Rule 1153 and 1153.1, evaluated under Food and Agriculture and Fuel Combustion, respectively.

**TABLE 4-83
OTHER INDUSTRIAL EMISSIONS BASED ON 2037 SUMMER PLANNING INVENTORY**

| Source Category | VOC (tpd) | NO _x (tpd) |
|--|-----------|-----------------------|
| 321 – Tanks (unspecified) | 0.00 | 0.00 |
| 322 – Floating roof tanks – breathing losses | 0.00 | 0.00 |
| 324 – Floating roof tanks - working losses | 1.32 | 0.00 |
| 326 – Fixed roof tanks – breathing losses | 0.00 | 0.00 |
| 328 – Fixed roof tanks - working losses | 0.65 | 0.00 |
| 332 – Pressure tanks | 0.00 | 0.00 |
| 338 – Cooling towers | 0.00 | 0.00 |
| 390 – Tank cars and trucks – working losses | 0.00 | 0.00 |
| 490 – Recycling processes | 0.00 | 0.00 |
| 492 – Storage/transport container cleaning | 0.00 | 0.00 |

| Source Category | VOC (tpd) | NOx (tpd) |
|----------------------|-------------|-------------|
| 907 – Industrial Use | 2.11 | 0.00 |
| 995 – Other | 1.29 | 0.03 |
| Total | 5.37 | 0.03 |

b. Evaluation

As discussed, the only rules identified with applicability to this source category are South Coast AQMD Rules 463 and 1144, which are evaluated under Petroleum Production and Marketing – Storage Tanks and Related Losses and Cleaning and Surface Coatings – Other (Cleaning and Surface Coatings), respectively.

c. Conclusion

Staff evaluation of comparable regulations elsewhere did not identify rules that are more stringent than South Coast AQMD Rules 463 and 1144. Therefore, no potential contingency measure has been identified.

Solvent Evaporation

Major source categories in the solvent evaporation group include 510 – Consumer Products, 520 – Architectural Coatings and Related Process Solvents, 530 – Pesticides/Fertilizers, and 540 – Asphalt Paving and Roofing. Solvent evaporation emits primarily VOC and there are zero NOx emissions associated with these categories. Solvent evaporation accounts for a total of 147.40 tpd of VOC emissions in 2037, with the bulk of the emissions attributable to consumer products. South Coast AQMD has regulatory authority over source categories 520 – Architectural Coatings and Related Process Solvents and 540 – Asphalt Paving and Roofing, while source categories 510 – Consumer Products and 530 – Pesticides/Fertilizers are primarily regulated by CARB.

1. Consumer Products

A consumer product is a chemically formulated product used by household and institutional consumers including, but not limited to, detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn, and garden products; disinfectants; sanitizers; aerosol paints and adhesives; and automotive specialty products; but does not include other paint products, furniture coatings, or architectural coatings. Although each product only contains a small amount of VOC, Californians use over half a billion of these items every year.⁶⁴ Consumer products account for 132.36 tpd of VOC and zero NOx emissions in 2037. A large portion of area source VOC emissions comes from consumer products, which increases over time due to population growth in the region.

⁶⁴ CARB, Consumer Products Program webpage <https://ww2.arb.ca.gov/our-work/programs/consumer-products-program/about>

Consumer products are primarily regulated under the CARB Consumer Products Regulatory Program. However, under California Health & Safety Code § 41712(f) air pollution control districts may regulate consumer products that CARB has not yet regulated. South Coast AQMD Rule 1143 – Consumer Paint Thinners and Multi-Purpose Solvents was adopted in March 2009 and last amended on December 3, 2010 to reduce VOC emissions from the use, storage and disposal of consumer paint thinners and multipurpose solvents commonly used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations not regulated by CARB at that time. A comparative analysis of Rule 1143 requirements, applicability, and exemptions can be found in Table 4-32.

In September 2009, CARB adopted an amendment to include multi-purpose solvents and paint thinners under the consumer products regulation and established a VOC limit of 30 percent by weight as of December 31, 2010 and a VOC limit of 3 percent by weight as of December 31, 2013. Since CARB's consumer products regulation is statewide, CARB's VOC limits for multi-purpose solvents and paint thinners preempt South Coast AQMD's Rule 1143 VOC limits and are in effect for the Basin. Additionally, an infeasibility justification for consumer products regulated under CARB's authority is presented in Appendix B.

2. Architectural Coatings

a. Overview

Architectural coatings are any coatings used to enhance the appearance of and to protect stationary structures and their appurtenances, including homes, office buildings, factories, pavements, curbs, roadways, racetracks, bridges, and other structures on a variety of substrates. Architectural coatings are typically applied using brushes, rollers, or spray guns by homeowners, painting contractors, and maintenance personnel. Architectural coatings account for 12.44 tpd of VOC and zero NO_x emissions in 2037. This source category is regulated under South Coast AQMD Rules 1113 – Architectural Coatings and 314 – Fees for Architectural Coatings.

Rule 1113 was first adopted in 1977 and most recently amended on February 5, 2016 to limit the VOC content of architectural coatings used in the South Coast AQMD jurisdiction. Rule 1113 applies to any person who supplies, sells, markets, offers for sale, or manufactures any architectural coating that is intended to be applied to stationary structures or their appurtenances, and to fields and lawns. Coating-specific emission limits range from 50 to 730 g/L, depending on coating category. Rule 1113 has a small container exemption for architectural coatings in containers less than one liter, unless otherwise specified in Table 4-44. The small container exemption only applies if the following conditions are met:

- (A) The manufacturer reports the sales in the Rule 314 Annual Quantity and Emissions Report;
- (B) The coating containers of the same specific coating category are not bundled together to be sold as a unit that exceeds one liter, or eight fluid ounces for Flat and Nonflat Coatings and Rust Preventative Coatings, excluding containers packed together for shipping to a retail outlet;

(C) The label or any other product literature does not suggest combining multiple containers so that the combination exceeds one liter, or eight fluid ounces for Flat and Nonflat Coatings and Rust Preventative Coatings.

Rule 314 requires architectural coating manufacturers who sell architectural coatings into or within South Coast AQMD's jurisdiction and are subject to Rule 1113 to electronically submit an Annual Quantity and Emissions Report (AQER). The AQER reports the total annual quantity (in gallons) and emissions of architectural products distributed or sold during the previous year. The emissions inventory for architectural coatings is based on these annual quantity and emissions reports. Fees are assessed on the manufacturers' reported annual quantity of architectural coatings and the cumulative VOC emissions reported annually. Rule 314 affects about 200 architectural coatings manufacturers.

b. Evaluation

Existing regulations for architectural coatings in other jurisdictions that have recently been adopted or amended were evaluated in Table 4-84 and include: MDAQMD Rule 1113, SJVAPCD Rule 4601, SDAPCD Rule 67.0.1, VCAPCD Rule 74.2, Regulations of Connecticut State Agencies (RCSA) Section 22a-174-41a, and the 2020 CARB Suggested Control Measure (SCM) for Architectural Coatings.

This analysis determined that VOC emissions limits in South Coast AQMD Rule 1113 are as stringent as, if not more stringent than, those in other jurisdictions for most architectural coating categories. Rule 1113 sets the most stringent limits for graphic arts and metallic pigmented coatings. Furthermore, Rule 1113 breaks down the industrial maintenance and faux finishing categories with more function-specific emission limits unlike rules in other districts. There are other differences in how categories are defined among districts' rules. For example, basement specialty coatings, concrete/masonry sealers, and waterproofing membranes categories as defined by other districts' rules all fall under the waterproofing concrete/masonry sealers category in South Coast AQMD Rule 1113 that has an equivalent or more stringent VOC limit.

Staff also evaluated the small container exemption in Rule 1113. As shown in Table 4-84, while all districts generally exempt small containers of one liter or less, South Coast AQMD has removed more coatings categories from the small container exemption list than any other district. Staff therefore concludes that South Coast AQMD Rule 1113 is the most stringent with respect to the small container exemption.

c. Conclusion

Staff evaluation of control measures for architectural coatings found that South Coast AQMD rules are as stringent as or more stringent than other air agencies' rules and did not identify any VOC controls for consideration as contingency measures.

**TABLE 4-84
COMPARISON OF ARCHITECTURAL COATINGS CONTROL REQUIREMENTS**

| | South Coast AQMD Rule 1113 – Architectural Coatings (Amended 2/5/16) | MDAQMD Rule 1113 – Architectural Coatings (Amended 10/26/20) | SJVAPCD Rule 4601 – Architectural Coatings (Amended 4/16/20) | SDAPCD Rule 67.0.1 – Architectural Coatings (Amended 2/10/21) | VCAPCD Rule 74.2 – Architectural Coatings (Amended 11/10/20) | RCSA Section 22a-174-41a – Architectural and Industrial Maintenance Coatings (Amended 2/2/18) | 2020 CARB SCM for Architectural Coatings (Amended 5/28/20) |
|---------------|---|---|---|--|---|--|---|
| Applicability | Any person who supplies, applies, stores, sells, markets, offers for sale, or manufactures any architectural coating that is intended to be field applied within the District to stationary structures or their appurtenances, and to fields and lawns | Any person who supplies, applies, sells, offers for sale, manufactures, blends or repackages any Architectural Coating for use within the District | Any person who supplies, markets, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures, blends or repackages any architectural coating for use within the District | Any person who manufactures, blends or repackages, supplies, sells, markets, offers for sale, applies, or solicits the application of any architectural coating for use within San Diego County | Any person who markets, supplies, applies, sells, offers for sale, or manufactures, blends, or repackages any architectural coating for use within the District | Any person who sells, supplies, applies, offers for sale or manufactures for sale in the state of Connecticut any architectural coating manufactured on or after May 1, 2018 for use in the state of Connecticut | Any person who supplies, sells, applies, markets, offers for sale, manufactures, blends, or repackages any architectural coating for use within the District |
| Exemptions | <ul style="list-style-type: none"> • Coatings that are supplied, sold, offered for sale or manufactured for use outside of the District • Certain categories of coatings in containers having a capacity of one liter or less • Any coating in containers having | <ul style="list-style-type: none"> • Coatings that are supplied, sold, offered for sale or manufactured for use outside of the District • Coatings in containers having a capacity of one liter or less | <ul style="list-style-type: none"> • Coatings that are supplied, sold, offered for sale or manufactured for use outside of the District • Coatings in containers having a capacity of one liter or less • Aerosol coating products | <ul style="list-style-type: none"> • Coatings that are supplied, sold, offered for sale or manufactured for use outside of the District • Aerosol coating products • Emulsion type bituminous pavement sealers • Coatings in containers having | <ul style="list-style-type: none"> • Coatings that are supplied, sold, offered for sale or manufactured for use outside of the District • Aerosol coating products • Facilities which apply coatings to test | <ul style="list-style-type: none"> • Coatings that are supplied, sold, offered for sale or manufactured for use outside of the State • Aerosol coating products • An architectural coating manufactured | <ul style="list-style-type: none"> • Coatings that are supplied, sold, offered for sale or manufactured for use outside of the District • Aerosol coating products • Coatings in containers having a |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| | South Coast AQMD Rule 1113 – Architectural Coatings (Amended 2/5/16) | MDAQMD Rule 1113 – Architectural Coatings (Amended 10/26/20) | SJVAPCD Rule 4601 – Architectural Coatings (Amended 4/16/20) | SDAPCD Rule 67.0.1 – Architectural Coatings (Amended 2/10/21) | VCAPCD Rule 74.2 – Architectural Coatings (Amended 11/10/20) | RCSA Section 22a-174-41a – Architectural and Industrial Maintenance Coatings (Amended 2/2/18) | 2020 CARB SCM for Architectural Coatings (Amended 5/28/20) |
|--|--|---|--|---|--|---|--|
| | <p>a capacity of two fluid ounces or less</p> <ul style="list-style-type: none"> • Emulsion type bituminous pavement sealers • Aerosol coatings products • Use of stains and lacquers in areas at an elevation of 4,000 feet or greater • Facilities which apply coatings to test specimens for purposes of research and development of those coatings | <ul style="list-style-type: none"> • Aerosol coating products • Colorants added at the factory or at the worksite | <ul style="list-style-type: none"> • Colorants added at the factory or at the worksite | <p>a capacity of one liter or less</p> <ul style="list-style-type: none"> • Colorants added at the factory or at the worksite | <p>specimens for purposes of research and development of those coatings</p> <ul style="list-style-type: none"> • Coatings in containers having a capacity of one liter or less • Colorants added at the factory or at the worksite | <p>prior to May 1, 2018</p> <ul style="list-style-type: none"> • Coatings in containers having a capacity of one liter or less • Transactions involving architectural coatings to, from or within an installation operated by any branch of the U.S. military | <p>capacity of one liter or less</p> <ul style="list-style-type: none"> • Colorants added at the factory or at the worksite |
| The Small Container exemption does not apply to: | Wood Coatings, including Lacquers, Varnishes, and Sanding Sealers; Concrete-Curing Compounds For Roadways and Bridges; Magnesite Cement Coatings; Multi-Color Coatings; PreTreatment Wash | - | Bituminous Roof Coatings; Flat Coatings that are sold in containers having capacities greater than eight fluid ounces; Magnesite Cement Coatings; Multi-Color Coatings; Nonflat Coatings that are sold in containers | Bituminous Roof Coatings; Flat Coatings that are sold in containers having capacities greater than eight fluid ounces; Magnesite Cement Coatings; Multi-Color Coatings; Nonflat Coatings that are sold in | - | - | - |

| | <p>South Coast AQMD Rule 1113 – Architectural Coatings (Amended 2/5/16)</p> | <p>MDAQMD Rule 1113 – Architectural Coatings (Amended 10/26/20)</p> | <p>SJVAPCD Rule 4601 – Architectural Coatings (Amended 4/16/20)</p> | <p>SDAPCD Rule 67.0.1 – Architectural Coatings (Amended 2/10/21)</p> | <p>VCAPCD Rule 74.2 – Architectural Coatings (Amended 11/10/20)</p> | <p>RCSA Section 22a-174-41a – Architectural and Industrial Maintenance Coatings (Amended 2/2/18)</p> | <p>2020 CARB SCM for Architectural Coatings (Amended 5/28/20)</p> |
|--|--|---|---|---|---|--|---|
| | <p>Primers; Roof Primers, Bituminous; Sacrificial AntiGraffiti Coatings; Stone Consolidants; Repair and Other Swimming Pool Coatings; and Below-Ground and Other Wood Preservatives; Tub and Tile Refinishing Coatings; Clear and Pigmented Shellacs; and Reactive Penetrating Sealers; Flats and Nonflat, Coatings that are sold: (i) In containers having capacities greater than eight fluid ounce, or (ii) For purposes other than touch up; Industrial Maintenance Coatings, including Color Indicating Safety Coatings, High Temperature</p> | | <p>having capacities greater than eight fluid ounces; Pre-Treatment Wash Primers; Reactive Penetrating Sealers; Shellacs (Clear and Opaque); Stone Consolidants; Swimming Pool Coatings; Tub and Tile Refinishing Coatings; Wood Coatings, including Lacquers, Varnishes, and Sanding Sealers; and Wood Preservatives</p> | <p>containers having capacities greater than eight fluid ounces; Pretreatment Wash Primers; Reactive Penetrating Sealers; Shellacs (Clear and Opaque); Stone Consolidants; Swimming Pool Coatings; Tub and Tile Refinishing Coatings; Wood Coatings; and Wood Preservatives</p> | | | |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| | South Coast AQMD Rule 1113 – Architectural Coatings (Amended 2/5/16) | MDAQMD Rule 1113 – Architectural Coatings (Amended 10/26/20) | SJVAPCD Rule 4601 – Architectural Coatings (Amended 4/16/20) | SDAPCD Rule 67.0.1 – Architectural Coatings (Amended 2/10/21) | VCAPCD Rule 74.2 – Architectural Coatings (Amended 11/10/20) | RCSA Section 22a-174-41a – Architectural and Industrial Maintenance Coatings (Amended 2/2/18) | 2020 CARB SCM for Architectural Coatings (Amended 5/28/20) |
|---|--|--|--|---|--|---|--|
| | IM Coatings, NonSacrificial Anti-Graffiti Coatings, and Zinc-Rich IM Primers that are sold: (i) In containers having capacities greater than one liter, or (ii) For purposes other than touch up, or (iii) Displayed or advertised for sale at a retail outlet; Rust Preventative Coatings that are sold: (i) In containers having capacities greater than eight fluid ounce, or (ii) For purposes other than touch up | | | | | | |
| VOC Content of General Coatings (g/L) | | | | | | | |
| Flat Coatings | 50 | 50 | 50 | 50 | 50 | 50 | 50 |
| Nonflat Coatings | 50 | 50 | 50 | 50 | 50 | 100 | 50 |
| VOC Content of Specialty Coatings (g/L) | | | | | | | |
| Nonflat - High Gloss Coatings | 50 | - | 50 | 50 | 50 | 150 | - |

| | South Coast AQMD Rule 1113 – Architectural Coatings (Amended 2/5/16) | MDAQMD Rule 1113 – Architectural Coatings (Amended 10/26/20) | SJVAPCD Rule 4601 – Architectural Coatings (Amended 4/16/20) | SDAPCD Rule 67.0.1 – Architectural Coatings (Amended 2/10/21) | VCAPCD Rule 74.2 – Architectural Coatings (Amended 11/10/20) | RCSA Section 22a-174-41a – Architectural and Industrial Maintenance Coatings (Amended 2/2/18) | 2020 CARB SCM for Architectural Coatings (Amended 5/28/20) |
|--|--|--|--|---|--|---|--|
| Aluminum Roof Coatings | 100 | 100 | 100 | 100 | 100 | 450 | 100 |
| Basement Specialty Coatings ^a | - | 400 | 400 | 400 | 400 | 400 | 400 |
| Bituminous Roof Coatings | 50 | 50 | 50 | 50 | 50 | 270 | 50 |
| Bituminous Roof Primers | 350 | 350 | 350 | 350 | 350 | 350 | 350 |
| Bond Breakers | 350 | 350 | 350 | 350 | 350 | 350 | 350 |
| Building Envelope Coatings | 50 | 50 | 50 | 50 | 50 | - | 50 |
| Concrete Curing Compounds | 100 | 100 | 350 | 350 | 350 | 350 | 350 |
| Concrete/Masonry Sealers ^a | - | 100 | 100 | 100 | 100 | 100 | 100 |
| Driveway Sealers | 50 | 50 | 50 | 50 | 50 | 50 | 50 |
| Dry Fog Coatings | 50 | 50 | 50 | 50 | 50 | 150 | 50 |
| Faux Finishing Coatings: | - | 350 | 350 | 350 | 350 | 350 | 350 |
| Clear Topcoat | 100 | - | - | - | - | - | - |
| Decorative Coatings | 350 | - | - | - | - | - | - |
| Glazes | 350 | - | - | - | - | - | - |
| Japan | 350 | - | - | - | - | - | - |
| Trowel Applied Coatings | 50 | - | - | - | - | - | - |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| | South Coast AQMD Rule 1113 – Architectural Coatings (Amended 2/5/16) | MDAQMD Rule 1113 – Architectural Coatings (Amended 10/26/20) | SJVAPCD Rule 4601 – Architectural Coatings (Amended 4/16/20) | SDAPCD Rule 67.0.1 – Architectural Coatings (Amended 2/10/21) | VCAPCD Rule 74.2 – Architectural Coatings (Amended 11/10/20) | RCSA Section 22a-174-41a – Architectural and Industrial Maintenance Coatings (Amended 2/2/18) | 2020 CARB SCM for Architectural Coatings (Amended 5/28/20) |
|---|--|--|--|---|--|---|--|
| Fire Resistive Coatings | 150 | 150 | 150 | 150 | 150 | 350 | 350 |
| Floor Coatings | 50 | 50 | 50 | 50 | 50 | 100 | 100 |
| Form-Release Compounds | 100 | 100 | 100 | 100 | 100 | 250 | 100 |
| Graphic Arts Coatings (Sign Paints) | 200 | 500 | 500 | 500 | 500 | 500 | 500 |
| High Temperature Coatings ^b | - | 420 | 420 | 420 | 420 | 420 | 420 |
| Industrial Maintenance (IM) Coatings: | 100 | 250 | 250 | 250 | 250 | 250 | 250 |
| Color Indicating Safety Coatings | 480 | - | - | - | - | - | - |
| High Temperature IM Coatings ^b | 420 | - | - | - | - | - | - |
| Non-Sacrificial Anti-Graffiti Coatings | 100 | - | - | - | - | - | - |
| Zinc-Rich IM Primers ^c | 100 | - | - | - | - | - | - |
| Low Solids Coatings | 120 | 120 | 120 | 120 | 120 | 120 | 120 |
| Magnesite Cement Coatings | 450 | 450 | 450 | 450 | 450 | 450 | 450 |

| | South Coast AQMD Rule 1113 – Architectural Coatings (Amended 2/5/16) | MDAQMD Rule 1113 – Architectural Coatings (Amended 10/26/20) | SJVAPCD Rule 4601 – Architectural Coatings (Amended 4/16/20) | SDAPCD Rule 67.0.1 – Architectural Coatings (Amended 2/10/21) | VCAPCD Rule 74.2 – Architectural Coatings (Amended 11/10/20) | RCSA Section 22a-174-41a – Architectural and Industrial Maintenance Coatings (Amended 2/2/18) | 2020 CARB SCM for Architectural Coatings (Amended 5/28/20) |
|--|--|--|--|---|--|---|--|
| Mastic Texture Coatings | 100 | 100 | 100 | 100 | 100 | 100 | 100 |
| Metallic Pigmented Coatings | 150 | 500 | 500 | 500 | 500 | 500 | 500 |
| Multi-Color Coatings | 250 | 250 | 250 | 250 | 250 | 250 | 250 |
| Pre-Treatment Wash Primers | 420 | 420 | 420 | 420 | 420 | 420 | 420 |
| Primers, Sealers, and Undercoaters | 100 | 100 | 100 | 100 | 100 | 100 | 100 |
| Reactive Penetrating Sealers | 350 | 350 | 350 | 350 | 350 | 350 | 350 |
| Recycled Coatings | 150 | 250 | 250 | 250 | 250 | 250 | 250 |
| Roof Coatings | 50 | 50 | 50 | 50 | 50 | 250 | 50 |
| Rust Preventative Coatings | 100 | 250 | 250 | 250 | 250 | 250 | 250 |
| Sacrificial Anti-Graffiti Coatings | 50 | - | - | - | - | - | - |
| Shellacs: | | | | | | | |
| Clear | 730 | 730 | 730 | 730 | 730 | 730 | 730 |
| Opaque | 550 | 550 | 550 | 550 | 550 | 550 | 550 |
| Specialty Primers, Sealers, and Undercoaters | 100 | 100 | 100 | 100 | 100 | 100 | 100 |
| Stains: | | | | | | | |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| | South Coast AQMD Rule 1113 – Architectural Coatings (Amended 2/5/16) | MDAQMD Rule 1113 – Architectural Coatings (Amended 10/26/20) | SJVAPCD Rule 4601 – Architectural Coatings (Amended 4/16/20) | SDAPCD Rule 67.0.1 – Architectural Coatings (Amended 2/10/21) | VCAPCD Rule 74.2 – Architectural Coatings (Amended 11/10/20) | RCSA Section 22a-174-41a – Architectural and Industrial Maintenance Coatings (Amended 2/2/18) | 2020 CARB SCM for Architectural Coatings (Amended 5/28/20) |
|---|--|--|--|---|--|---|--|
| Exterior/Dual | 100 | 100 | - | 100 | 100 | 250 | 100 |
| Interior | 250 | 100 | 250 | 250 | 250 | 250 | 250 |
| Stone Consolidants | 450 | 450 | 450 | 450 | 450 | 450 | 450 |
| Swimming Pool Coatings | 340 | 340 | 340 | 340 | 340 | 340 | 340 |
| Tile and Stone Sealer | 100 | 100 | 100 | 100 | 100 | - | 100 |
| Traffic Marking Coatings | 100 | 100 | 100 | 100 | 100 | 100 | 100 |
| Tub and Tile Refinish Coatings | 420 | 420 | 420 | 420 | 420 | 420 | 420 |
| Waterproofing Concrete/Masonry Sealers ^a | 100 | - | - | - | - | - | - |
| Waterproofing Membranes ^a | - | 100 | 100 | 100 | 100 | 250 | 250 |
| Wood Coatings | 275 | 275 | 275 | 275 | 275 | 275 | 275 |
| Wood Conditioners | 100 | - | - | - | - | - | - |
| Wood Preservatives | 350 | 350 | 350 | 350 | 350 | 350 | 350 |
| Zinc-Rich Primers ^c | - | 340 | 340 | 340 | 340 | 340 | 340 |
| VOC Content of Colorants (g/L) | | | | | | | |
| Architectural Coatings, | 50 | 50 | 50 | 50 | 50 | - | 50 |

| | South Coast AQMD Rule 1113 – Architectural Coatings (Amended 2/5/16) | MDAQMD Rule 1113 – Architectural Coatings (Amended 10/26/20) | SJVAPCD Rule 4601 – Architectural Coatings (Amended 4/16/20) | SDAPCD Rule 67.0.1 – Architectural Coatings (Amended 2/10/21) | VCAPCD Rule 74.2 – Architectural Coatings (Amended 11/10/20) | RCSA Section 22a-174-41a – Architectural and Industrial Maintenance Coatings (Amended 2/2/18) | 2020 CARB SCM for Architectural Coatings (Amended 5/28/20) |
|-----------------------|--|--|--|---|--|---|--|
| excluding IM Coatings | | | | | | | |
| Solvent-Based IM | 600 | 600 | 600 | 600 | 600 | - | 600 |
| Waterborne IM | 50 | 50 | 50 | 50 | 50 | - | 50 |

^a The Basement Specialty Coatings, Concrete/Masonry Sealers, and Waterproofing Membranes categories as defined by other districts’ rules all fall under the Waterproofing Concrete/Masonry Sealers category in South Coast AQMD Rule 1113 that has an equivalent or more stringent VOC limit.

^b The South Coast AQMD Rule 1113 High-Temperature Industrial Maintenance Coatings category has a comparable definition to the High Temperature Coatings category in other districts’ rules and an equivalent VOC limit.

^c The South Coast AQMD Rule 1113 Zinc-Rich Industrial Maintenance Primers category has a comparable definition to the Zinc-Rich Primers category in other districts’ rules and a more stringent VOC limit.

3. Pesticides and Fertilizers

Pesticides account for 1.19 tpd of VOC and zero NOx emissions in 2037 due to the use of methyl bromide and other pesticides. However, there are no VOC or NOx emissions associated with fertilizers in the Basin.

Pesticides are regulated under both federal and state law. Under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), the U.S. EPA has authority to control pesticide distribution, sale, and use. Pesticides used in the United States must first be registered (licensed) by the U.S. EPA and subsequently registered by the Department of Pesticide Regulation (DPR) prior to being distributed, sold or used in California. Registration ensures that pesticides will be properly labeled and will not cause significant adverse effects to human health or the environment. DPR is the agency responsible for regulating the sale and use of pesticides in California. DPR can generally reduce exposures to pesticides through the development and implementation of necessary restrictions on pesticide sales and use and by encouraging integrated pest management. Mitigation measures may be implemented by several methods, including regulations, local permit conditions, pesticide label changes, or product cancellation.

Additionally, an infeasibility justification for pesticides under CARB’s authority is presented in Appendix B.

4. Asphalt Paving and Roofing

a. Overview

Major source category 540 – Asphalt Paving and Roofing accounts for 1.41 tpd of VOC and zero NOx emissions in 2037. A breakdown of these emissions is provided in Table 4-85. This source category is regulated by South Coast AQMD Rules 1108 – Cutback Asphalt, Rule 1108.1 – Emulsified Asphalt, and Rule 470 – Asphalt Air Blowing. There are no NOx emissions associated with these processes.

**TABLE 4-85
ASPHALT EMISSIONS BASED ON 2037 SUMMER PLANNING INVENTORY**

| Source Category | VOC (tpd) |
|----------------------------------|-------------|
| 562 – Road Oils | 0.63 |
| 564 – Hot-Mix Asphalt | 0.07 |
| 566 – Emulsified Asphalt | 0.40 |
| 590 – Asphalt Roofing Operations | 0.31 |
| 995 – Other | 0.00 |
| Total | 1.41 |

Road oils are a type of cutback asphalt, which is a liquid petroleum product produced by fluxing an asphaltic base with suitable distillate and is classed as medium or slow curing grade, as defined in Section 93 of the January 1981, State of California Department of Transportation Standard Specifications. Rule 1108 prohibits the sale or use of any cutback asphalt containing more than 0.5 percent by volume organic compounds which evaporate at 260°C (500°F) or lower.

Emulsified asphalt is a liquid petroleum product produced by fluxing an asphaltic base with water and an emulsifier, and is classed as rapid, medium, or slow curing grade as described under Section 94 of the January 1981, State of California Department of Transportation Standard Specifications. Rule 1108.1 prohibits the sale and use of any emulsified asphalt containing organic compounds which evaporate at 260°C (500°F) or lower in excess of three percent by volume.

Asphalt air blowing is an oxidation process which involves the blowing of air through asphalt, either on a batch or a continuous basis, at a temperature of 240°C to 320°C. The emissions inventory does not provide a sufficient level of detail to ascertain whether asphalt air blowing is used in any of the processes that contribute to emissions under major source category 540. Nevertheless, asphalt air blowing is regulated by Rule 470, which requires that all gases and vapors from asphalt blowing equipment are incinerated at temperatures of not less than 760°C (1,400°F) for a period of not less than 0.3 seconds.

b. Evaluation

Existing regulations for asphalt paving and roofing in other jurisdictions are evaluated in Table 4-86. South Coast AQMD Rules 1108 and 1108.1 were evaluated together to facilitate comparison. Control requirements are generally similar except for MDAQMD Rule 471, which contains specific requirements for asphalt roofing operations. The rule primarily requires close fitting lids and other best management practices during the preparation and transfer of asphalt. South Coast AQMD does not have an equivalent rule applicable to asphalt roofing operations. However, MDAQMD's rule is designed to mitigate odor nuisance during transfer rather than reduce VOC emissions.

c. Conclusion

Staff considered asphalt roofing requirements under MDAQMD Rule 471 as a potential contingency measure. However, the containment of VOC emissions within the roofing kettle does not reduce overall VOC emissions from this process since the kettle contents must be drained and applied to roofs. Assuming that the temperature of the asphalt when it is applied to roofs is the same as in the kettle, the asphalt will emit the same quantity of VOC. Even if this were not the case, there would be a substantial amount of fugitive emissions during cooling. Since this measure would not result in emission reductions, staff determined that it would not be a suitable contingency measure. There were no other potential contingency measures identified for this source category.

**TABLE 4-86
COMPARISON OF ASPHALT CONTROL REQUIREMENTS**

| Rule Element | South Coast AQMD Rule 1108.1 – Emulsified Asphalt (Amended 11/4/83) and Rule 1108 – Cutback Asphalt (Amended 2/1/85) | MDAQMD Rule 471 – Asphalt Roofing Operations (Amended 12/21/94) | SJVAPCD Rule 4641 – Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations (Amended 12/17/92) | SMAQMD Rule 453 – Cutback and Emulsified Asphalt Paving Materials (Amended 8/31/82) | BAAQMD Rule 8-15 – Emulsified and Liquid Asphalts (Amended 6/1/94) |
|---------------|---|--|---|--|--|
| Applicability | Any person who supplies, sells, markets, offers for sale, or uses emulsified or cutback asphalt | Any person who operates equipment used for melting, heating, or holding asphalt or coal tar pitch | Manufacturers and users of cutback asphalt, slow cure asphalt and emulsified asphalt for paving and maintenance operations | Any person who supplies, sells, markets, offers for sale, or uses cutback or emulsified asphalt | Any person who supplies, sells, markets, offers for sale, or uses cutback or emulsified asphalt |
| Exemptions | <ul style="list-style-type: none"> • Emulsified or cutback asphalt for which other source-specific rules apply | <ul style="list-style-type: none"> • Equipment having a capacity of 100 liters (26.4 gallons) or less. • Equipment having a capacity of 600 liters (159 gallons) or less which is equipped with a close fitting lid and not opened except for loading the kettle | <ul style="list-style-type: none"> • Asphalt manufactured for shipment and use outside of the District • Medium cure asphalt when the National Weather Service official forecast of the high temperature for the 24-hour period following application is below 50°F | <ul style="list-style-type: none"> • Use of cutback asphalt or emulsified asphalt in the manufacturing of paving materials where such materials are for immediate shipment and eventual use outside of the County of Sacramento • Medium cure cutback asphalt as a penetrating prime coat until suitable substitute is identified (evaluated annually) | <ul style="list-style-type: none"> • Medium cure asphalt when the National Weather Service official forecast of the high temperature for the 24-hour period following application is below 50°F |

| Rule Element | South Coast AQMD Rule 1108.1 – Emulsified Asphalt (Amended 11/4/83) Rule 1108 – Cutback Asphalt (Amended 2/1/85) | MDAQMD Rule 471 – Asphalt Roofing Operations (Amended 12/21/94) | SJVAPCD Rule 4641 – Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations (Amended 12/17/92) | SMAQMD Rule 453 – Cutback and Emulsified Asphalt Paving Materials (Amended 8/31/82) | BAAQMD Rule 8-15 – Emulsified and Liquid Asphalts (Amended 9/16/87) |
|-----------------|---|---|--|--|--|
| Control Measure | <ul style="list-style-type: none"> Emulsified asphalt cannot contain more than 3% VOC by volume at temperatures $\leq 260^{\circ}\text{C}$ (500°F) Cutback asphalt cannot contain more than 0.5% VOC by volume at temperatures $\leq 260^{\circ}\text{C}$ (500°F) | <ul style="list-style-type: none"> Equipment used for melting, heating, or holding asphalt or coal tar pitch must employ a close fitting lid that shall not be opened except for loading the kettle or when the kettle is $<150^{\circ}\text{F}$ Roofing kettles must adhere to the following temperature limits: <ul style="list-style-type: none"> 500°F for asphalt 400°F for coal tar pitch During roofing kettle draining, the kettle must be contained by a close fitting lid and the receiving vessel must also be covered by a close fitting lid or capped within 2 minutes Kettle vents must remain closed except during a pressure release | <ul style="list-style-type: none"> For penetrating prime coat, tack coat, dust palliative, or other paving and maintenance operations: <ul style="list-style-type: none"> The use of rapid and medium cure cutback asphalts are prohibited Slow cure asphalt must not contain more than 0.5% VOC at temperatures $\leq 260^{\circ}\text{C}$ (500°F) Emulsified asphalt must not contain more than 3% VOC by volume at temperatures $\leq 260^{\circ}\text{C}$ (500°F) | <ul style="list-style-type: none"> Cutback asphalt: <ul style="list-style-type: none"> The use of rapid and medium cure cutback asphalts are prohibited Slow cure asphalt containing VOC at temperatures $\leq 260^{\circ}\text{C}$ (500°F) is prohibited Emulsified asphalt cannot contain more than 3% VOC by volume at temperatures $\leq 260^{\circ}\text{C}$ (500°F) | <ul style="list-style-type: none"> The use of rapid and medium cure cutback asphalts are prohibited Slow cure asphalt must not contain more than 0.5% VOC at temperatures $\leq 260^{\circ}\text{C}$ (500°F) Emulsified asphalt cannot contain more than 3% VOC |

Miscellaneous Processes

1. Residential Fuel Combustion

a. Overview

Major source category 610 – Residential Fuel Combustion consists of several subcategories, including wood combustion and fuel combustion (space heating, water heating, cooking, and other appliances, such as clothes dryers, barbecues, and water heaters used for pools, spas and hot tubs). Residential wood combustion sources are evaluated in this section; fuel combustion sources (particularly space heaters and water heaters) were previously evaluated in this chapter.

Residential wood combustion sources account for 0.12 tpd of NO_x and 1.40 tpd of VOC emissions in 2037 (approximately 0.06 percent and 0.21 percent of overall NO_x and VOC emissions, respectively). Residential wood burning includes wood-burning heaters (i.e., woodstoves, pellet stoves, and wood-burning fireplace inserts), which are used primarily for heat generation, and wood-burning fireplaces, which are used primarily for aesthetic purposes.

One of the most effective ways to reduce VOC and NO_x emissions is through a curtailment program that restricts use of wood-burning heaters and fireplaces on days that are conducive to poor air quality. South Coast AQMD Rule 445 – Wood Burning Devices - establishes requirements for the sale, transfer, operation, and installation of wood burning devices and on the advertising of wood for sale intended for burning. Among those requirements is a wood burning curtailment program that implements ozone and PM_{2.5} contingency measures in the Basin. PM_{2.5} reductions from Rule 445 are not evaluated in this document since PM_{2.5} is not an ozone precursor.

b. Evaluation

Rule 445 includes contingency measures for ozone and PM_{2.5} standards in the South Coast Air Basin and was submitted for inclusion into the SIP. U.S. EPA approved the PM_{2.5} contingency measures but deferred action on the ozone portion.⁶⁵ The first ozone contingency measure in Rule 445 would be triggered upon U.S. EPA's finding of failure to attain the 1997 8-hour ozone standard in the South Coast Air Basin. U.S. EPA proposed a finding to failure to attain the standard on August 15, 2024.⁶⁶ As of ~~July~~ January 2025, it has not been finalized. The ozone contingency measure implements a wood burning curtailment program from September through April. During these months, curtailment will be triggered when 8-hour ozone levels are forecast to exceed 80 ppb in any area of the Basin. Rule 445 contains two additional contingency measures that will be triggered sequentially upon U.S. EPA finding that the South Coast Air Basin failed to meet a milestone or attain an applicable ozone standard. These two measures would lower the wood burning

⁶⁵ U.S. EPA, Air Plan Approval; California; Los Angeles—South Coast Air Basin, 87 Fed. Reg. 12866 (March 8, 2022). <https://www.federalregister.gov/documents/2022/03/08/2022-04761/air-plan-approval-california-los-angeles-south-coast-air-basin>

⁶⁶ U.S. EPA, Finding of Failure To Attain the 1997 8-Hour Ozone Standards; California; Los Angeles-South Coast Air Basin, 89 Fed. Reg. 66291 (August 15, 2024). <https://www.federalregister.gov/documents/2024/08/15/2024-17573/finding-of-failure-to-attain-the-1997-8-hour-ozone-standards-california-los-angeles-south-coast-air>

curtailment threshold to 75 ppb and 70 ppb, respectively, from September through April.

As of January 2025, Rule 445 is undergoing an amendment process to remove the low-income exemption from the curtailment program.⁶⁷ Removal of the low-income exemption is expected to further reduce VOC and NOx emissions on days when ozone levels are forecasted to exceed 80 ppb during the curtailment season. The rule amendment implements a control measure from the PM2.5 Plan to fulfill Most Stringent Measure requirements mandated by Clean Air Act Section 188(e).⁶⁸ As this measure is needed to fulfill a SIP commitment, it is ineligible for consideration as a contingency measure.

Staff is not aware of any other district that implements a wood burning curtailment program governed by forecasted ozone levels. With the proposed Rule 445 amendment, South Coast AQMD will implement the most stringent wood burning curtailment program.

c. Conclusion

South Coast AQMD Rule 445 already implements ozone contingency measures. In addition, Rule 445 has been demonstrated to implement the most stringent wood burning curtailment program compared to all other air districts and no additional contingency measures are proposed.

2. Farming Operations

a. Overview

Source category 620 – Farming Operations consists of stationary source emissions related to animal husbandry and crop farming. This source category accounts for 1.30 tpd of VOC and zero NOx emissions in the Basin’s 2037 summer planning inventory. All stationary source VOC emissions from farming operations are attributable to livestock waste, with cattle accounting for 82 percent of the VOC emissions.

b. Evaluation

South Coast AQMD Rules 223 and 1127 apply to this source category. Table 4-87 summarizes the rule requirements.

**TABLE 4-87
SOUTH COAST AQMD VOC CONTROL MEASURES FOR FARMING OPERATIONS**

| Rule | Applicability | Control Measure |
|---|--|---|
| Rule 223 – Emission Reduction Permits for Large Confined Animal Facilities (Adopted 6/2/06) | Applies to Large Confined Animal Facilities (CAFs), defined as those having: <ul style="list-style-type: none"> 1,000 or more milk-producing dairy cows; or | <ul style="list-style-type: none"> Requires large CAFs to obtain permits with information necessary to prepare an emissions inventory of all regulated air pollutants emitted from the operation |

⁶⁷ South Coast AQMD, Proposed Amended Rule 445 (December 17, 2024). <https://www.aqmd.gov/home/rules-compliance/rules/scagmd-rule-book/proposed-rules/rule--445>

⁶⁸ South Coast AQMD, 2012 Annual PM2.5 Plan (June 7, 2024). [https://www.aqmd.gov/home/air-quality/air-quality-management-plans/other-state-implementation-plan-\(sip\)-revisions/2012-annual-pm2-5-plan](https://www.aqmd.gov/home/air-quality/air-quality-management-plans/other-state-implementation-plan-(sip)-revisions/2012-annual-pm2-5-plan)

| Rule | Applicability | Control Measure |
|--|--|--|
| | <ul style="list-style-type: none"> • 3,500 or more beef cattle; or • 7,500 or more calves, heifers, or other cattle; or • 100,000 or more turkeys; or • 650,000 or more chickens other than laying hens; or • 650,000 or more laying hens; or • 3,000 or more swine; or • 15,000 or more sheep, lambs, or goats; or • 2,500 or more horses; or • 650,000 or more ducks; or • 30,000 or more rabbits or other animals | <ul style="list-style-type: none"> • Requires dairy owners/operators to implement at least: <ul style="list-style-type: none"> • six of 12 corral measures; and • two of seven solid manure or separated solids handling measures; and • one of eight liquid manure handling measures; and • two of four land application measures • Requires poultry owners/operators to implement at least: <ul style="list-style-type: none"> • one of seven solid manure or separated solids handling measures; and • one of eight liquid manure handling measures |
| <p>Rule 1127 – Emission Reductions from Livestock Waste (Adopted 8/6/04)</p> | <p>Applies to dairy farms and related operations such as heifer and calf farms and the manure produced on them. It also applies to manure processing operations, such as composting operations and anaerobic digesters</p> | <ul style="list-style-type: none"> • Manure must be disposed at a manure processing operation, on agricultural land, or a combination of the two • Manure processing operators are required to process manure using: <ul style="list-style-type: none"> • An anerobic digestor; or • A composting or alternative composting operation that complies with Rule 1133 and/or 1133.2 requirements • Alternative composting operations must begin composting within two working days of arrival on-site |

Each Confined Animal Facility (CAF) consists of multiple distinct sources of emissions. Since CAFs generally cover a large area and have different processes, a single mitigation measure or technology is generally not sufficient to control overall emissions from the facility. To accommodate the unique operational nature of CAFs, Rule 223 allows operators of dairies and poultry farms to select from a menu of mitigation measures.

Rule 223 currently applies to dairies with 1,000 cattle and poultry farms with 650,000 birds. However, as of January 2025, a rule amendment process is underway to lower the applicability thresholds to 500 and 400,000 for dairy cattle and birds, respectively.⁶⁹ The rule amendment implements a control measure from the PM2.5 Plan to fulfill Most Stringent Measure requirements mandated by Clean Air Act Section 188(e).⁷⁰ As this measure is needed to fulfill a SIP commitment, it is ineligible for consideration as a contingency

⁶⁹ South Coast AQMD, Proposed Amended Rule 223. <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-223>

⁷⁰ South Coast AQMD, 2012 Annual PM2.5 Plan (June 7, 2024). [https://www.aqmd.gov/home/air-quality/air-quality-management-plans/other-state-implementation-plan\(sip\)-revisions/2012-annual-pm2-5-plan](https://www.aqmd.gov/home/air-quality/air-quality-management-plans/other-state-implementation-plan(sip)-revisions/2012-annual-pm2-5-plan)

measure.

Staff is not aware of another district rule equivalent to South Coast AQMD Rule 1127 that applies only to dairies and manure processing operations. Therefore, no further evaluation was performed.

c. Conclusion

Rule 223 is undergoing an amendment process to lower the applicability thresholds for dairies and poultry farms. Once the amendment has been adopted, Rule 223 will be as stringent or more stringent than other districts' rules. No contingency measure opportunities were identified for this source category.

3. Fugitive Dust Categories

Fugitive dust source categories include 630 – Construction and Demolition, 640 – Paved Road Dust, 645 – Unpaved Road Dust, and 650 – Fugitive Windblown Dust. Fugitive dust emissions are typically generated through the pulverization of surface materials by mechanical force or by entrainment of dust particles in turbulent air streams.⁷¹ These categories do not contribute to any VOC or NOx emissions and, therefore, were not further evaluated.

4. Fires

Source Category 660 – Fires includes emissions from automobile and structural fires. The structural fire subcategory includes residential and commercial structures as well as mobile home fires. The fires source category accounts for 0.29 tpd of VOC and 0.08 tpd of NOx emissions in the Basin's 2037 emissions inventory. The reported emissions are based on the number of vehicle fires per year and based on structural fires data from California Fire Incident Reporting System from the California State Fire Marshall's Office.⁷² Considering the fires under this source category are non-routine and unpredictable, no control measures have been identified to mitigate emissions from these sources.

5. Managed Burning and Disposal (Open Burning)

a. Overview

Major source category 670 – Managed Burning and Disposal consists of numerous sub-categories including various agricultural burning, forest management, and non-agricultural open burning. This source category accounts for 0.22 tpd of VOC and 0.10 tpd of NOx emissions in the Basin's 2037 emissions inventory. A detailed breakdown of these emissions is shown in Table 4-88. South Coast AQMD Rule 444 – Open Burning

⁷¹ U.S. EPA, "Compilation of Air Pollutant Emissions Factors, Volume 1: Stationary Point and Area Sources," Chapter 13, Section 2, available at https://www.epa.gov/sites/default/files/2020-10/documents/13.2_fugitive_dust_sources.pdf (last updated January 1995)

⁷² CARB 1999 emission inventory summary for structure and automobile fires: <https://www.arb.ca.gov/ei/areasrc/arbmiscprocfires.htm>

has strict requirements for when and which types of burns are allowed.

**TABLE 4-88
OPEN BURNING EMISSIONS BASED ON 2037 SUMMER PLANNING INVENTORY**

| Source Category | VOC (tpd) | NOx (tpd) |
|--|-------------|-------------|
| 660 – Agricultural Burning - Prunings | 0.01 | 0.01 |
| 662 – Agricultural Burning - Field Crops | 0.00 | 0.00 |
| 664 – Range Improvement | 0.09 | 0.07 |
| 666 – Forest Management | 0.08 | 0.01 |
| 668 – Weed Abatement | 0.05 | 0.02 |
| Total | 0.22 | 0.10 |

i. Burning of Agricultural Materials

Agricultural burning involves open burning of vegetative materials produced from growing and harvesting of crops. It includes the burning of grass and weeds in fence rows, ditch banks and berms in no-till orchard operations, the burning of fields being prepared for cultivation, the burning of agricultural wastes, and the operation or maintenance of a system for the delivery of water for agricultural operations. The associated VOC and NOx emissions are both very small (less than 0.01 tpd).

ii. Land Management and Hazard Reduction Burning

Prescribed burning is the planned application of fire conducted by state and federal land managers, local governments, utilities and private land owners to meet planned resource management objectives, such as forest management, wildlife habitat management, range improvement, fire hazard reduction, wilderness management, weed abatement, watershed rehabilitation, vegetation manipulation, disease and pest prevention, and ecosystem management. Hazard reduction burning involves the disposal of dry brush surrounding homes and businesses in the wildland-urban interface in order to ensure a barrier of fire protection of 100 feet in all directions.

b. Evaluation

Table 4-89 briefly summarizes Rule 444 requirements and Table 4-90 briefly summarizes the control measures in other jurisdictions.

**TABLE 4-89
RULE 444 REQUIREMENTS**

| Applicability | Requirements |
|--|---|
| <ul style="list-style-type: none"> • Agricultural burning • Disposal of Russian thistle • Prescribed burning • Fire prevention/suppression training; • Open detonation or use of pyrotechnics • Fire hazard removal • Disposal of infectious waste, other than hospital waste, research of testing materials, equipment or techniques • Disposal of contraband • Residential burning <p>Beach burning</p> <p>Exemptions:</p> <ul style="list-style-type: none"> • Fire suppression training by fire agencies • Open burning to protect crops from freezing • Open burning on islands located 15 miles or more from the mainland • Fireworks display • Explosives detonation • Recreational and ceremonial fires • Food preparation fires and fires for warmth at social gatherings | <ul style="list-style-type: none"> • No specific agricultural crop phase outs or bans • Burning of waste/garbage is prohibited • No burning except on permissive burn days or marginal burn days on which burning is permitted in the applicable source or receptor area, and such burning is not prohibited by the applicable public fire protection agency • Specific requirements for burn authorization requests and permit conditions for each category of burning |

**TABLE 4-90
OTHER CONTROL MEASURES CONSIDERED (MANAGED BURNING AND DISPOSAL)**

| Measure | Applicability | Requirements |
|--|---|---|
| SJVAPCD Rule 4103 – Open Burning (Amended 4/15/10) | Open burning conducted in the San Joaquin Valley Air Basin, except for prescribed burning and hazard reduction burning (regulated under District Rule 4106) Exemptions: <ul style="list-style-type: none"> • Fires used for cooking, campfires, and religious fires with clean fuel, dry wood or charcoal • Emergency burning by a fire agency • Respectful burning of an unserviceable American Flag • Bags used for agricultural chemicals • Raisin trays | <ul style="list-style-type: none"> • No burning of garbage or other materials • Burning shall be allocated by the APCO dependent on dispersion conditions and shall avoid negative impacts to receptors • No permit shall be issued for the burning of the field crops, prunings, weed abatement, orchard removals, vineyard removals, surface harvested prunings and other materials, except for crops for which the Board has determined that there is no economically feasible alternative means of eliminating the waste and the continued issuance of permits for that specific category or crop will not cause a violation of air quality standards • Additional requirements for burning times, drying times, contraband burning • Permit required for burning of Russian Thistle • Conditional burning permit required for diseased materials with specific requirements • Burn plans required for fire suppression training, burning of contraband • BMP selection required for weed maintenance |

| Measure | Applicability | Requirements |
|--|---|---|
| <p>SJVAPCD Rule 4106 – Prescribed Burning and Hazard Reduction Burning (Adopted 6/21/01)</p> | <p>Applies to all prescribed burning and to hazard reduction burning in wildland-urban interface</p> | <ul style="list-style-type: none"> • No burning of garbage or green waste • District allocates burning permits based on predicted meteorological conditions and whether contaminants could create or contribute to an exceedance of an ambient air quality standard or impact smoke sensitive areas • Requirements such as minimizing smoke, ignition devices, keeping vegetation free of dirt, soil, and moisture • Requirement for prescribed burn conductors to complete prescribed burning smoke management training class approved by the APCO • Permits required for all hazard reduction burning, valid only on days that burning is not prohibited by the CARB, by the District or other designated agencies |
| <p>BAAQMD Regulation 5 – Open Burning (Amended 11/20/19)</p> | <p>Open burning activities Exemptions:</p> <ul style="list-style-type: none"> • Fires set only for cooking • Fires burning as safety flares or for the combustion of waste gases • Flame cultivation when the burning is performed with LPG or natural gas-fired burners designed and used to kill seedling grass and weeds and the growth is such that the combustion will not continue without the burner • Fires set for the purposes of fire training using one gallon or less of flammable liquid per fire | <ul style="list-style-type: none"> • No specific agricultural crop phase-outs or bans • Recreational fires allowed on non-curtailment days • On permissive burn days, numerous select fire types are allowed with permission from the APCO |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| Measure | Applicability | Requirements |
|---|--|--|
| <p>SMAQMD Rule 501 – Agriculture Burning (Amended 4/3/97)</p> | <p>Agricultural burning, including:</p> <ul style="list-style-type: none"> • Agricultural waste disease prevention • Range improvement • Forest, wildlife and game habitat, irrigation system, and wild land vegetation management • Paper containers of agricultural chemicals <p>Contains similar exemptions as San Joaquin Valley for agricultural operations, including burning of bags used for agricultural chemicals and emergency agricultural burns which would cause economic loss if denied</p> | <ul style="list-style-type: none"> • No specific crop phase outs or bans (subject to air basin-wide rice burning reduction) • Permit holder must contact District for permission to burn and ensure that it is not a no-burn day and must contact the fire protection agency having jurisdiction over the burn location • Contains specific drying time requirements for different agricultural materials |
| <p>VCAPCD Rule 56 – Open Burning (Adopted 11/11/03)</p> | <p>Combustible materials in open outdoor fires Exemptions:</p> <ul style="list-style-type: none"> • Fires used only for the heating or cooking of food for human consumption • Recreational fires confined to a fireplace or barbecue pit • Flag burning • Fire suppression training • Fire agency or public officer may set fires to reduce hazards as needed | <ul style="list-style-type: none"> • No specific crop phase-outs or bans • Permit required for open burning • Burning only allowed on permissive burn days • Open burning allowed for the disposal of agricultural wastes in the pursuit of agricultural operations, range improvement burning, wildland vegetation management burning, levee, reservoir, or ditch maintenance and the disposal of Russian thistle • Burn times, drying times, and permit conditions also specified |

| Measure | Applicability | Requirements |
|--|---|---|
| Placer County APCD (PCAPCD) Rule 301 – Nonagricultural Burning Smoke Management (Amended 8/9/18) | Open outdoor fires, including the use of burn barrels Exemptions: <ul style="list-style-type: none"> • Fire hazard reduction burning • Public officer waiver • Recreational or cooking fire • American Flag • Open burning conducted by public officers | <ul style="list-style-type: none"> • No person shall ignite or allow open outdoor burning without a valid burn permit from the District for fire hazard reduction, mechanized burner, open burning conducted by public officers, right of way clearing, levee, ditch and reservoir maintenance • Separate burn permit required from fire protection agency with jurisdiction in area of the proposed burn project • Air Pollution Control Officer may prohibit or add additional specific burn permit conditions |

Staff did not identify any more stringent requirements in other districts' rules except those in SJVAPCD Rule 4103. Rule 4103 prohibits agricultural burns except if it is determined that no feasible alternative exists. In accordance with Rule 4103, SJVAPCD evaluated the economic and technologic feasibility of alternatives to burning and requested CARB concurrence to postpone burn prohibitions for some crop categories.⁷³ CARB provided concurrence through December 31, 2024.⁷⁴ Effective January 1, 2025, SJVAPCD will implement a near-complete prohibition of agricultural burning.

Agricultural burning is extremely limited in the Basin as evidenced by the very small emissions inventory (0.002% and 0.005% of the total VOC and NO_x emissions, respectively, in the Basin). Chipping and grinding is the primary alternative to agricultural burning. However, chipping and grinding usually has a high incremental cost compared to burning. Due to the high incremental cost, SJVAPCD provides incentives ranging from \$300/acre to \$1,300/acre depending on the crop and whether soil incorporation is included.⁷⁵ Further, agricultural burning is much more prevalent in the SJVAPCD. The extent of burning is reported annually to CARB based on the acreage of crops cleared to produce a burn pile. In 2022, there were only 10.1 acres cleared for agricultural burning in the Basin.⁷⁶ By comparison, there were 33,451 acres cleared in 2022 for agricultural burning in the SJVAPCD.⁷⁷ The extremely limited extent of agricultural burning in the Basin combined with the high cost of alternatives suggests that this measure is economically infeasible and would have an inconsequential impact on air quality. Moreover, the total VOC and NO_x emissions from agricultural burning are less than 5 percent of OYW of progress in the Basin. Thus, potential contingency measures for agricultural burning can be excluded from further consideration as they would be considered "unquestionably negligible" per U.S. EPA's guidance.

Regarding prescribed burns and range improvement, staff did not identify any more stringent provisions in other districts' rules. Furthermore, these programs have a proven record of reducing wildfire severity and therefore have implications for public safety. There are renewed efforts to drastically increase the number of acres treated by prescribed fire in order to reduce the air quality impacts of increasingly intense wildfires caused by years of drought due to climate change and past forest management practices that have allowed the accumulation of the understory in forests throughout the west. Forest management through prescribed fire reduces overall emissions by reducing the intensity and available fuel of wildfires occurring on recently treated lands.

The distinct wet and dry seasons in the Basin along with poor summertime air quality that may restrict prescribed fire for nearly half of a year in some locations make finding suitable conditions for prescribed fire extremely challenging for fire agencies. Placing further restrictions on prescribed fires is inconsistent

⁷³ SJVAPCD, Final 2020 Staff Report and Recommendations on Agricultural Burning, December 17, 2020.

<https://ww2.valleyair.org/media/wjgk2hzi/2020-ag-burn-report.pdf>

⁷⁴ CARB, Letter of Concurrence for SJVAPCD Agricultural Burning, June 18, 2021.

https://ww2.arb.ca.gov/sites/default/files/2021-06/SJV_Ag_Burn_Concurrence_Letter_061821.pdf

⁷⁵ SJVUAPCD Governing Board Item Number 10: Accept and Appropriate \$178,200,000 in State Funding and Approve Enhancements to Alternatives to Agricultural Open Burning Incentive Program.

https://www.valleyair.org/Board_Meetings/Gb/Agenda_Minutes/Agenda/2021/August/Final/10.Pdf

⁷⁶ South Coast AQMD Open Burn Program Log Book

⁷⁷ Email from Leland Villalvazo, SJVAPCD, September 11, 2023

with the goal of increasing the number of acres treated by prescribed fire and may result in higher intensity wildfires, increased threats to life and property, and increased emissions that occur from fires that burn on untreated lands. Given these considerations, contingency measures for prescribed burns are infeasible.

c. Conclusion

There are no feasible contingency measures for this source category that could be implemented within two years and result in significant emission reductions within that time frame.

6. Commercial Cooking

a. Overview

Major source category 690 – Commercial Cooking mostly includes emissions from commercial charbroiling, deep fat frying, and general cooking. The majority of emissions in this category come from charbroiling, which consists of two types of commercial charbroilers: chain-driven and under-fired. A chain-driven charbroiler is a semi-enclosed broiler that moves food mechanically through the device on a grated grill to cook the food for a specific amount of time. An under-fired charbroiler has a metal "grid," a heavy-duty grill similar to that of a home barbecue, with gas burners, electric heating elements, or solid fuel (wood or charcoal) located under the grill to provide heat to cook the food. Under-fired charbroilers are widely used in commercial kitchens to cook meats, including beef, burgers, and chicken. These heavy-duty appliances commonly use evenly spaced, gas-fired burners to produce direct-flame, radiant heat a few inches below slatted, cast-iron cooking surfaces.⁷⁸ The slatted cooking surface allows fat, oil, and grease (FOG) from the meat to fall into the burner flames, which produces flaring that brings the flame into direct contact with the meat. Charbroilers do not include flat-top or plancha grills with continuous cooking surfaces that prevent the flame from directly contacting the meat.

Commercial cooking sources account for 1.21 tpd of VOC emissions and zero NO_x emissions in the Basin's 2037 inventory. Under-fired and chain-driven charbroilers contribute about 80 percent of the VOC emissions from commercial cooking. For under-fired charbroilers, grease is typically captured by the grease filter of the ventilation hood over the charbroiler with the remaining VOC exhausted unless a secondary control is installed. Catalytic oxidizers are used to control VOC emissions from chain-driven charbroilers, but they are not effective for reducing emissions from under-fired charbroilers. For under-fired charbroilers, the exhaust from these devices loses heat as it is directed to the control device, and the reactions at the catalyst cannot take place under these lower temperatures. Thus, electrostatic precipitators (ESP) and filter media are anticipated to be the potential control technologies for reducing

⁷⁸ Specifications for Commercial Hoods and Kitchen Ventilation in the 2019 California Mechanical Code are classified under four duty categories: light, medium, heavy, and extra-heavy duty cooking service. Gas underfired charbroilers are listed as heavy-duty cooking appliances. Charbroilers utilizing solid fuel (e.g., charcoal, wood) are classified as extra-heavy-duty and are outside the scope of this evaluation. Available at <https://epubs.iapmo.org/2019/CMC/index.html#p=136>

PM2.5 emissions from under-fired charbroilers, but these technologies have little, if any, benefit for reducing VOC emissions.⁷⁹

b. Evaluation

Rule 1138 – Control of Emissions from Restaurant Operations reduces VOC emissions from commercial cooking by requiring catalytic oxidizers for chain-driven charbroilers that cook greater than or equal to 875 pounds of meat per week. Currently, Rule 1138 does not require emissions controls for under-fired charbroilers. However, given that available control technologies for under-fired charbroilers primarily reduce PM2.5 emissions, it is unclear how effective these technologies would be at controlling VOC emissions. Therefore, staff determined that further evaluation of control measures for under-fired charbroilers was unwarranted.

In evaluating chain-driven charbroiler control measures, staff reviewed SJVAPCD’s Rule 4692, as U.S. EPA found in 2020 that the rule satisfies stringent control requirements such as Best Available Control Measures and Most Stringent Measures. U.S. EPA noted that “Rule 4692 implements the most stringent measures adopted or demonstrated to be technically and economically feasible for commercial chain-driven charbroilers.”⁸⁰ Rule 4692 reduces VOC emissions by requiring catalytic oxidizers for chain-driven charbroilers cooking 400 pounds of meat or more per week. This threshold is more stringent than that in South Coast AQMD Rule 1138 (875 pounds of meat or more per week). Finally, staff reviewed chain-driven charbroiler regulations in other jurisdictions such as BAAQMD, VCAPCD, and New York City. The evaluation is summarized in Table 4-91.

⁷⁹ San Joaquin Valley Air Pollution Control District. Commercial Underfired Charbroiler Emissions Control Technologies. Available at <http://www.valleyair.org/Grants/documents/rctp/Charbroiler-Control-Technologies.pdf> (accessed 06/01/2022)

⁸⁰ Technical Support Document, EPA Evaluation of BACM/MSM for the San Joaquin Valley PM2.5 Plan for the 2006 PM2.5 NAAQS, p. 30-36 (February 2020). Retrieved from: <https://downloads.regulations.gov/EPA-R09-OAR-2019-0318-0005/content.pdf>

**TABLE 4-91
COMPARISON OF CONTROL MEASURES FOR CHAIN-DRIVEN CHARBROILERS**

| Rule | Applicability | Control Measure |
|---|---|--|
| South Coast AQMD Rule 1138 – Control of Emissions from Restaurant Operations (Amended 11/14/97) | Chain-driven charbroilers Exemptions: <ul style="list-style-type: none"> • Facilities that accept a permitting condition limiting the amount of meat cooked to less than 875 lbs per week • Facilities that submit testing showing that emissions are less than 1 lb per day of any criteria pollutant | Only operate a chain-driven charbroiler with an approved catalytic oxidizer |
| SJVAPCD Rule 4692 – Commercial Charbroiling (Amended 6/21/18) | Chain-driven charbroilers and underfired charbroilers at commercial cooking operations Exemptions: <ul style="list-style-type: none"> • If a chain-driven or underfired charbroiler cooks less than 400 lbs of meat per week, OR less than 10,800 lbs in the most recent 12-month rolling period and the total amount of meat cooked per week does not exceed 875 lbs | <p>Chain-driven charbroilers: Reduce VOC emissions by 86% through the installation of an approved catalytic oxidizer. Catalytic oxidizers certified by South Coast AQMD are compliant</p> <p>Underfired charbroilers: Registration requirement; weekly recordkeeping requirement for both charbroiler categories</p> |
| VCAPCD Rule 74.25 – Restaurant Cooking Operations (Amended 10/12/04) | Conveyorized (chain-driven) charbroilers Exemptions: <ul style="list-style-type: none"> - Charbroilers placed into service prior to Oct. 2005 that cook less than 875 lbs per week | Requires the installation of an approved control device to reduce VOC emissions by 83%. Catalytic oxidizers certified by South Coast AQMD are compliant |

| Rule | Applicability | Control Measure |
|--|---|--|
| BAAQMD Rule 6-2 – Commercial Cooking Equipment (Adopted 12/5/07) | Chain-driven charbroilers at commercial cooking operations. Exemptions: <ul style="list-style-type: none"> Chain-driven charbroilers that cook less than 400 lbs of beef per week | Requires the installation of a certified catalytic oxidizer (controlled to 0.32 lbs of VOC per 1,000 lbs of beef cooked). Catalytic oxidizers certified by South Coast AQMD are compliant. |
| City of New York Title 24 of the Administrative Code, Section 24-149.4 – Commercial Char broilers (Amended 5/6/16) and NYC Rules, Title 15, Section 37-02 – Requirements for Emissions Control Devices (Amended 9/16/16) | Chain-driven charbroilers at commercial cooking operations Exemptions: Charbroilers that cook less than 875 lbs of meat per week | Requires catalytic oxidizer or other control device. Catalytic oxidizers certified by South Coast AQMD are compliant. |

All other rules and regulations evaluated reference South Coast AQMD’s list of certified catalytic oxidizers.⁸¹ With the exception of the applicability threshold in Rule 1138, staff did not identify any more stringent provisions in other jurisdictions’ regulations. As of January 2025, Rule 1138 is undergoing an amendment process to lower the applicability threshold for chain-driven charbroilers to 400 pounds of meat cooked per week, matching the stringency of SJVAPCD Rule 4692.⁸² The rule amendment implements a control measure from the PM2.5 Plan to fulfill Most Stringent Measure requirements mandated by Clean Air Act Section 188(e).⁸³ As this measure is needed to fulfill a SIP commitment, it is ineligible for consideration as a contingency measure.

c. Conclusion

Staff did not identify any potential contingency measures for this source category.

7. Other (Miscellaneous Processes)

There are no VOC or NOx emissions from this source category.

⁸¹ South Coast AQMD, List of Certified Catalytic Oxidizers. <https://www.aqmd.gov/docs/default-source/permitting/product-certification/charbroilerscatalysts.pdf?sfvrsn=0>

⁸² South Coast AQMD, Proposed Amended Rule 1138. <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-1138>

⁸³ South Coast AQMD, 2012 Annual PM2.5 Plan (June 7, 2024). [https://www.aqmd.gov/home/air-quality/air-quality-management-plans/other-state-implementation-plan-\(sip\)-revisions/2012-annual-pm2-5-plan](https://www.aqmd.gov/home/air-quality/air-quality-management-plans/other-state-implementation-plan-(sip)-revisions/2012-annual-pm2-5-plan)

Indirect Source Rules

a. Overview

An indirect source is defined in Clean Air Act Section 110(a)(5)(C) as “...a facility, building, structure, installation, real property, road, or highway which attracts, or may attract, mobile sources of pollution.” The Clean Air Act provides that any state may include in a SIP, but the U.S. EPA may not require as a condition of approval of such SIP, any indirect source review program. The U.S. EPA may approve and enforce, as part of an applicable implementation plan, an indirect source review program which the State chooses to adopt and submit as part of its plan. However, U.S. EPA may not require an indirect source review program as a condition of approval of such plan.

South Coast AQMD has adopted three indirect source rules, Rule 2202 On-Road Motor Vehicle Options, Rule 2305 Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, and Rule 2306 –Freight Rail Yards. Rule 2202 applies to employers with more than 250 employees at a worksite, and provides multiple options to reduce emissions from employee commute trips. Options include allowing worksites to develop and implement a rideshare program to meet an average vehicle ridership target, purchasing credits from credit vendors to meet an emission reduction goal, or paying a mitigation fee that funds a variety of emission reduction projects. Allowable strategies include reducing emissions (e.g., encouraging zero emission vehicles) or reducing trips (e.g., carpooling, parking cash-out). South Coast AQMD recently amended Rule 2202 to collect data on recent changes in teleworking patterns after the COVID-19 pandemic, along with other minor amendments. This additional data will inform a potential future amendment to Rule 2202.

Rule 2305 applies to warehouses greater than 100,000 square feet, and provides warehouse operators multiple options to reduce emissions or to facilitate emission reductions from mobile sources associated with their warehouse. Rule 2305 establishes a menu-based points system that requires warehouse operators to annually earn a specified number of points by completing actions from a menu. Menu items include acquiring or using: low NO_x and/or Zero Emissions (ZE) on-road trucks, ZE cargo handling equipment, ZE charging/fueling infrastructure, solar panels, or particulate filters for nearby sensitive land uses. Alternatively, warehouse operators could prepare and implement a custom plan specific to their site, or they could pay a mitigation fee. Funds from the mitigation fee will be used to incentivize the purchase of low NO_x or ZE trucks and ZE charging/fueling infrastructure in the communities near warehouses that paid the fee.

Rule 2306 applies to owners or operators of proposed, new, and existing freight rail yards located within the South Coast AQMD jurisdiction. Rule 2306 establishes emission reduction targets to ensure that NO_x reductions from freight rail yards within the South Coast AQMD jurisdiction will be achieved at levels that are proportional or more-than-proportional to reductions throughout California from implementation of state regulations affecting freight rail yard emission sources. Rule 2306 further requires facility-reporting on zero emission infrastructure, and for non-federal public agencies to include Rule 2306 compliance requirements in contracting with a freight rail yard owner or operator. Rule 2306 does not go into effect

until U.S. EPA grants an authorization under Clean Air Act Section 209(e)(2) to the California In-Use Locomotive Regulation (CCR, Title 13, Sections 2478 through 2478.17). On January 13, 2025, CARB withdrew its application to U.S. EPA seeking authorization under Clean Air Act Section 209(e)(2) to the California In-Use Locomotive Regulation. Thus, Rule 2306 is not currently in effect.

As of January 2025, South Coast AQMD is developing an indirect source rule for marine ports which is forecast to be brought to the South Coast AQMD Governing Board for its consideration in ~~October~~ August 2025.

The only other indirect source program that staff are aware of is Rule 9510 in SJVAPCD, which establishes a mechanism to reduce or offset emissions of NO_x and PM₁₀ from the construction and use of development projects through design features, on-site measures, and off-site measures. The rule requires applicants of certain new development projects to reduce operational and construction equipment NO_x and PM₁₀ emissions by specific percentages, as compared to an unmitigated baseline. The rule also requires applicants to incorporate design features and on-site measures into the development project or pay a mitigation fee for emissions in excess of the requirement. SJVAPCD uses the fees to fund off-site emission reduction projects.

b. Evaluation and Conclusion

U.S. EPA approved Rule 2305 into the SIP as a SIP strengthening measure concluding that it has certain deficiencies related to enforceability.⁸⁴ Because of the deficiencies related to enforceability, U.S. EPA concluded that the rule should not be credited in any attainment and rate of progress/reasonable further progress demonstrations. U.S. EPA similarly approved SJVAPCD's Rule 9510 into the SIP as a SIP strengthening measure.⁸⁵ Neither Rule 2202 nor Rule 2306 are currently approved into the SIP. Rule 2202 was disapproved due to allowing Executive Officer discretion for some components of the rule, and for relying on other rules and programs that are not in the SIP.⁸⁶

While indirect source rules provide important mechanisms to facilitate emission reductions, and ultimately result in quantifiable emission reductions, those reductions generally cannot be credited directly to the rule itself. The emission reductions are ultimately quantified in future revisions of statewide mobile source emissions models (e.g., CARB's EMFAC) or through regional transportation modeling (e.g., Southern

⁸⁴ U.S. EPA, Air Plan Approval; California; South Coast Air Quality Management District, 89 Fed. Reg. 73568 (September 11, 2024). <https://www.federalregister.gov/documents/2024/09/11/2024-20349/air-plan-approval-california-south-coast-air-quality-management-district>

⁸⁵ U.S. EPA, Revisions to the California State Implementation Plan, San Joaquin Valley Unified Air Pollution Control District, 75 Fed. Reg. 28509 (May 21, 2010). <https://www.federalregister.gov/documents/2010/05/21/2010-12281/revisions-to-the-california-state-implementation-plan-san-joaquin-valley-unified-air-pollution>; Air Plan Approval; California; San Joaquin Valley Unified Air Pollution Control District; 86 Fed. Reg. 33542 (June 25, 2021). <https://www.federalregister.gov/documents/2021/06/25/2021-13448/air-plan-approval-california-san-joaquin-valley-unified-air-pollution-control-district>

⁸⁶ U.S. EPA, Disapproval of California Air Plan Revisions, South Coast Air Quality Management District, 81 Fed. Reg. 4889 (January 28, 2016). <https://www.federalregister.gov/documents/2016/01/28/2016-01572/disapproval-of-california-air-plan-revisions-south-coast-air-quality-management-district>

California Association of Governments Regional Transportation Plan) that look more holistically at mobile source activity and emissions. For similar reasons, U.S. EPA concluded in its FIP for SJVAPCD that an indirect source rule is not an appropriate contingency measure.⁸⁷ We therefore conclude that no contingency measure is feasible for indirect source rules.

Conclusion

The comprehensive evaluation provided in this chapter demonstrates the lack of additional feasible ozone contingency measures for stationary and indirect sources in the South Coast Air Basin. Existing rules generally already implement the most stringent NO_x and VOC limits compared to regulations in other jurisdictions, U.S. EPA's RBLC, Control Techniques Guidelines, and other guidance documents. Further reductions would necessitate costly and time-intensive retrofits that exceed the two-year implementation window required for contingency measures or are otherwise infeasible. In addition, the dominance of mobile source NO_x emissions in the Basin limits the potential impact of further stationary source measures. Consequently, staff conclude that all feasible measures have been implemented, and that further opportunities for contingency measures are exhausted.

⁸⁷ U.S. EPA, Source Category and Control Measure Assessment and Reasoned Justification Technical Support Document - Proposed Contingency Measures Federal Implementation Plan for the Fine Particulate Matter Standards for San Joaquin Valley, California (July 2023)

**South Coast Air Basin Contingency Measure SIP Revision
for the 2015 8-Hour Ozone NAAQS Standard**

CHAPTER 5: PUBLIC PROCESS

Public Process

~~South Coast AQMD's Mobile Source Committee was briefed on the Draft South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS Standard was released on April 24, 2025 and the draft plan was released on April 24, 2025 to solicit public review and comments. South Coast AQMD's Mobile Source Committee was briefed on the plan on April 18, 2025. Staff held a public process will include one public consultation meeting on May 20, 2025 and meeting materials will be posted on South Coast AQMD's website 72 hours prior to the meeting. and real-time Spanish translation will be available if requested in advance. The written comment period for the Draft South Coast Air Basin Contingency Measure SIP Revision closed on May 30, 2025. A public hearing will be held at South Coast AQMD's Governing Board meeting on August 1, 2025, subject to change. Notification of the public hearing will be published in major newspapers in each county. Throughout the process, email updates will be sent to interested parties.~~

Written Comments and Responses to Comments

One comment letter was received on the Draft South Coast Ozone Contingency SIP Revision and a response is provided below.

Comment Letter #1

**VIA ELECTRONIC MAIL**

June 2, 2025

Dr. Sang-Mi Lee, Ph.D.
 Planning and Rules Manager
 South Coast Air Quality Management District
 21865 Copley Drive
 Diamond Bar, CA 91765
 Email: slee@aqmd.gov
AQMDteam@aqmd.gov

Re: Comments on Draft South Coast Ozone Contingency SIP Revision

I write comment on the South Coast Air Quality Management District's (Air District) Draft South Coast Ozone Contingency SIP Revision (Draft Plan) currently under review, and to express serious concerns about the agency's ability to address its attainment deficit stemming from past planning failures. We simply cannot accept the Air District's claim that it has already implemented all "feasible measures" as part of this round of contingency planning. The current proposal not only repeats the same flawed approach that contributed to the South Coast Air Basin's ("Air Basin") failure to attain the 1997 8-hour ozone standard, but it also repeats a familiar pattern of ignoring past planning failures that will undoubtedly jeopardize future attainment of the 2015 8-hour Ozone Standard currently being assessed as part of this plan.

Air planning plays a critical role in attaining ozone standards, and the events that trigger contingency measures under the Plan make the consequences of not getting strong enough measures even more dire for the breathing public. Section 172(c)(9) of the Clean Air Act (CAA) requires that "specific measures be undertaken if the air fails to make reasonable further progress, or to attain the national primary ambient air quality standard by the attainment date." Considering past planning failures, this plan falls short of delivering the necessary measures, and it must be amended to account for stronger commitments to emissions reductions that are now necessary.

The Air District Has Not Implemented All Feasible Measures

While this contingency measure plan is important, we cannot ignore the gaping hole in air planning left behind by the District's failure to achieve a valid Contingency Measure plan to address the region's continued use of Section 182(e)(5) "Black Box" measures. For years, advocates have warned against the District's reliance on "Black Box" measures—a regulatory placeholder that has failed by delaying tough decisions and relying on federal action or future

Comment
1-1

Comment
1-2

June 2, 2025
Page 2 of 3

technologies to close the emissions reduction gaps. We know now that those reductions never materialize, nor can we count on federal actions. At the same time, critical rules and valid control measures have languished, largely due to coordinated misinformation campaigns by polluters and delays designed to derail the agency’s ability to protect the public.

Comment
1-2 Cont’d

We need look no further than Proposed Rule 2304- The Indirect Source Rule (ISR)—Commercial Marine Ports for an example. While the District has known for decades that more action is needed to address emissions, particularly port-derived NOx emissions, and that an indirect source rule would offer the strongest solution, a Ports ISR remains unfinished after more than four years of official rulemaking. This speaks directly to the current Plan’s credibility and the Air District’s claim that there are no additional unimplemented feasible measures. There are—the District has simply chosen not to pursue them with the type of urgency required.

Comment
1-3

To that end, we urge the Air District to do the following:

- **Finalize and adopt an Indirect Source Rule for Commercial Marine Ports** that goes beyond infrastructure planning and sets enforceable emission reduction targets to reduce emissions across the port complex.
- **Adopt Strong Zero-NOx emission rules for residential and commercial appliances** with the aim of phasing out NOx-emitting fossil fuel-based units.
- **Expedite Implementation Timelines** for rules driving zero-emission technologies to meet the urgency of the moment while prioritizing equity programs and support needed to ensure all Air Basin residents benefit from the deployment of zero-emission technology.
- **Amend general conformity requirements** to push federally funded projects to achieve real, quantifiable emissions reductions.
- **Adopt zero-emission standards** for all remaining large combustion sources without further delay.
- **Implement previously “shelved” measures** from the 2016 and 2022 Air Quality Management Plans that were abandoned under the farce that the District had met its “global tonnage commitment.”

Comment
1-4

Comment
1-5

Comment
1-6

Comment
1-7

Comment
1-8

These stronger measures must be pursued to address the gap left by black box measures. The Air District is currently out of compliance with its Section 185(e)(5) obligations and has yet to address the 108 tpd attainment gap left in the wake of a failed “Black Box” contingency measure plan. The District cannot simply move on to the next standard while ignoring this gap, as the current plan proposes. Doing so is the definition of backsliding.

Comment
1-9

The Air District Must Develop Stronger Contingency Measures

The Draft Plan for the 2018 8-hour ozone standard under Section 182(c)(9) can still be improved. This plan offers an opportunity to strengthen compliance—but only if the District commits to

Comment
1-10

June 2, 2025

Page 3 of 3

correcting the policy mistakes that have thwarted rulemaking in the past and created unnecessary regulatory off-ramps.

Consider Rules 1111 and 1121, currently undergoing rulemaking for revision. The rules address NOx pollution from certain furnaces and water heaters. As currently proposed, the rules would offer an alternative compliance pathway—allowing manufacturers to comply by incrementally increasing the share of zero-NOx units over the next twelve years, but never fully reaching 100% zero-emissions. That kind of incremental regulatory design—one that allows for ongoing pollution indefinitely—is a prime candidate for swifter action when the region fails to attain a standard.

Comment
1-10 Cont'd

Automatically closing regulatory loopholes and disrupting gradualism when the region has failed to attain a standard is precisely what the contingency plan should offer. This would prompt the Air District to act decisively and with the urgency that attainment failures require. We recommend that the District use contingency measure planning to review any alternative compliance pathway that prolongs the use of polluting technologies and instead requires a full transition to zero-emissions once the plan is triggered. This is especially urgent in the wake of the region's ever-expanding nonattainment woes and concomitant public health crisis.

Conclusion

Communities in the South Coast Air Basin cannot afford half-measures as part of contingency planning. The Air District must be fully accountable for its contingency planning requirements, and that includes addressing the gaps left by the failed black box plan. We need contingency plans to result in real actions that ideally would never become necessary if the Air District were to deliver on its promises to secure a zero-emissions future through focused rulemaking.

Comment
1-11

Sincerely,

Fernando Gaytan

Senior Attorney

Earthjustice

David Pettit

Senior Attorney

Center for Biological Diversity

CC: Chair Vanessa Delgado

Email: vdelgado@aqmd.gov

Wayne Nastri, Executive Officer

Email: wnastri@aqmd.gov

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

Response to Comment 1-1: South Coast AQMD appreciates the comment letter from Earthjustice and the Center for Biological Diversity regarding the Draft South Coast Air Basin Contingency Measure SIP Revision. As explained in Chapter 1, the 2022 AQMP contains the strategy to meet the 2015 ozone standard by 2037. The South Coast Air Basin Contingency Measure SIP Revision does not alter the attainment strategy outlined in the 2022 AQMP and therefore it does not “jeopardize future attainment” of the standard.

The purpose of the South Coast Air Basin Contingency Measure SIP Revision is to address contingency measure requirements under CAA sections 172(c)(9) and 182(c)(9) for the 2015 ozone standard in the Basin. Contingency measures have specific criteria that differ from the criteria for control measures included in the 2022 AQMP. As explained in U.S. EPA’s guidance, contingency measures are emissions control requirements that would only take effect upon qualifying future events, such as if the Basin fails to attain a standard by the attainment date or fails to make reasonable further progress. Contingency measures must be adopted into rules that contain automatic triggering mechanisms and they must be able to be implemented and achieve emission reductions within up to two years of a triggering event. Most importantly, contingency measures cannot rely on control measures needed for attainment.

South Coast AQMD staff developed the South Coast Air Basin Contingency Measure SIP Revision to be consistent with U.S. EPA’s guidance, which requires a robust justification since the adopted contingency measures for the Basin achieve less than the recommended quantity of emission reductions. As presented in Chapter 4, staff performed an extensive evaluation of over 180 rules in other air districts, states, and federal regulations and did not identify any more stringent provisions that could be implemented as contingency measures. This extensive analysis supports the conclusion that all contingency measures feasible at the time of developing this SIP revision have been adopted.

Response to Comment 1-2: Contingency measure requirements under CAA sections 172(c)(9) and 182(c)(9) differ from the requirement for a contingency measure plan under CAA section 182(e)(5). This SIP revision addresses requirements under CAA sections 172(c)(9) and 182(c)(9), not CAA section 182(e)(5). Areas that are classified as “extreme” nonattainment for ozone are allowed to rely on CAA section 182(e)(5) “black box” measures that depend on the deployment of future advanced technologies. Three years prior to the attainment date, these areas must submit a contingency measure plan showing how the “black box” reductions will be achieved, or provide contingency measures in case advanced technologies do not deliver the expected reductions. The 2022 AQMP attainment strategy relied on 61 tons per day of NOx reductions from “black box” measures to meet the 2015 ozone standard by 2037. South Coast AQMD will submit a contingency measure plan to U.S. EPA addressing CAA section 182(e)(5) requirements by December 31, 2033. This submission is entirely separate from this South Coast Air Basin Contingency Measure SIP Revision.

Response to Comment 1-3: Staff is currently pursuing a measure related to ports, including Proposed Rule (PR) 2304, an Indirect Source Rule (ISR) for Commercial Marine Ports. A public hearing to consider adoption of PR 2304 is currently anticipated for the 4th quarter in 2025, subject to change. This potential action is focused on alternative fueling and charging infrastructure, which can be relied on by future control measures that would be developed at the federal, state, or local level. PR 2304 is being developed

through a robust public process. Alternative fueling and charging infrastructure can take many years to plan and develop and thus is not suited as a contingency measure triggered by a qualifying event. In addition, zero-emission vehicles and engines must be commercially available to be mandated within 60 days and to achieve emission reductions within two years of a triggering event. However, such transitions—especially when accounting for necessary infrastructure—require significantly longer implementation timelines than those specified for contingency measures. Thus, PR 2304 would not qualify as contingency measure.

Response to Comment 1-4: While the 2022 AQMP calls for a transition to zero emission technologies across all sectors wherever feasible, rules mandating phase out of combustion appliances would not qualify as contingency measures under U.S. EPA’s guidance. Contingency measures must take effect within 60 days of a triggering event and achieve emission reductions within two years. However, manufacturers require lead time to scale up production of zero-emission appliances to meet market demand. In addition, the infrastructure needed to support increased electrical load requires long-term planning and coordination with other agencies and utility providers to ensure grid stability and sufficient capacity. Therefore, mandates for zero-emission appliances are not viable as contingency measures.

Response to Comment 1-5: The attainment strategy set forth in the 2022 AQMP calls for a broad, economy-wide transition to zero emission technologies across all sources. To implement the strategy, as part of the rulemaking process, staff conduct a robust Best Available Retrofit Control Technology (BARCT) analysis to assess technological and economic feasibility of zero NOx emission limits. Staff also consider equity to ensure that all residents benefit from the technologies.

Some rules, including Rules 1153.1 - Emissions of Oxides of Nitrogen from Commercial Food Ovens and 1146.2 - Control of Oxides of Nitrogen from Large Water Heaters, Small Boilers and Process Heaters, have already been amended to introduce zero NOx limits. The emission reductions from Rules 1153.1 and 1146.2 are relied upon for attainment and, therefore, the zero NOx limits cannot be withheld to satisfy contingency measure requirements. In addition, other factors preclude adoption of zero NOx limits as contingency measures for stationary sources. For example, manufacturers need lead time to scale up production of zero emission appliances and equipment to satisfy market demand. Further, some stationary sources require additional time to design, purchase, install, and operate zero emission equipment. These processes would take longer than the timeframe specified in U.S. EPA’s guidance – 60 days for the measure to take effect and up to two years to achieve reductions. Therefore, it would not be feasible to implement a zero emission requirement as a contingency measure.

Response to Comment 1-6: As part of the attainment strategy in the 2022 AQMP, South Coast AQMD committed to implement control measure EGM-02 - Emission Reductions from Projects Subject to General Conformity Requirements to address general conformity and establish requirements for the emission increases to be offset or mitigated. South Coast AQMD will implement EGM-02 through a public process as early as possible. Because it is included in the attainment strategy, EGM-02 cannot be held in reserve to fulfill contingency measure requirements.

Response to Comment 1-7: As part of the attainment strategy in the 2022 AQMP, South Coast AQMD committed to transition large stationary sources to zero emissions (e.g., control measures L-CMB-02 - Reductions from Boilers and Process Heaters, L-CMB-03 - NOx Emission Reductions from Permitted Non-Emergency Internal Combustion Engines, L-CMB-04 - Emission Reductions from Emergency Standby Engines, etc.). However, as explained in Response to Comments 1-4 and 1-5, zero emission limits are not feasible as contingency measures due to implementation constraints.

Response to Comment 1-8: Nearly all stationary source control measures in the 2016 AQMP with quantified emission reductions have been implemented through rule amendments or incentive projects as shown in Table 5-1. The only remaining measure is CMB-04 - Emission Reductions from Restaurant Burners and Residential Cooking. This control measure has been carried over into the 2022 AQMP as two control measures: R-CMB-03 - Emissions Reductions from Residential Cooking Devices and C-CMB-03 - Emission Reductions from Commercial Cooking Devices. South Coast AQMD is committed to implementing these measures through a combination of regulatory approaches and incentive programs. No control measures have been “shelved” or abandoned and all other measures in the 2022 AQMP will continue to be implemented. Regardless, these control measures are committed for attainment and, therefore, they cannot be used as contingency measures.

TABLE 5-1
STATIONARY SOURCE CONTROL MEASURES FOR OZONE IN THE 2016 AQMP WITH QUANTIFIED REDUCTIONS

| <u>2016 AQMP Control Measure</u> | <u>2023 NO_x reductions (tpd)</u> | <u>2023 VOC reductions (tpd)</u> | <u>Implementing Rule(s) (Amendment Date) or 2022 AQMP control measure(s)</u> |
|--|---|----------------------------------|--|
| <u>CMB-01 - Transition to Zero and Near-Zero Emission Technologies for Stationary Sources</u> | <u>2.5</u> | <u>1.2</u> | <u>Rules 1146 - Emissions of Oxides of Nitrogen from Industrial, Institutional and Commercial Boilers, Steam Generators, and Process Heaters, 1146.1 - Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters, 1146.2 - Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters (12/7/18)</u> |
| <u>CMB-02 - Emission Reductions from Replacement with Zero or Near-Zero NO_x Appliances in Commercial and Residential Applications</u> | <u>1.1</u> | <u>-</u> | <u>Proposed Amended Rules 1111 - Reduction of NO_x Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces (9/1/23) and 1121 - Control of Nitrogen Oxides from Residential Type, Natural-Gas-Fired Water Heaters (9/3/04)</u> |
| <u>CMB-03 - Emission Reductions from Non-Refinery Flares</u> | <u>1.4</u> | <u>0.4</u> | <u>Rule 1118.1 - Control of Emissions from Non-Refinery Flares (1/4/19)</u> |
| <u>CMB-04 - Emission Reductions from Restaurant Burners and Residential Cooking</u> | <u>0.8</u> | <u>-</u> | <u>R-CMB-03 - Emissions Reductions from Residential Cooking Devices and C-CMB-03 - Emission Reductions from Commercial Cooking Devices</u> |
| <u>CMB-05 - Further NO_x Reductions from RECLAIM Assessment*</u> | <u>0.0</u> | <u>-</u> | <u>Rule 1109.1 - Emissions of Oxides of Nitrogen from Petroleum Refineries and Related Operations (11/5/21); Rule 1110.2 – Emissions from Gaseous- and Liquid- Fueled Engines (11/1/19); Rule 1117 - Emissions from Container Glass Melting and Sodium Silicate Furnaces (6/5/24); Rule 1118.1 (1/4/19); Rule 1134 – Emissions of Oxides of Nitrogen from Stationary Gas Turbines (4/5/19); Rule 1135 – Emissions of Oxides of Nitrogen from Electricity Generating Facilities (11/2/18); Rule 1146 series (12/7/18); Rule 1147 – NO_x Reductions from Miscellaneous Sources (5/6/22); Rule 1147 – NO_x Reductions from Miscellaneous Sources (5/6/22); Rule 1147.1 – NO_x</u> |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| 2016 AQMP Control Measure | 2023 NOx reductions (tpd) | 2023 VOC reductions (tpd) | Implementing Rule(s) (Amendment Date) or 2022 AQMP control measure(s) |
|--|---------------------------|---------------------------|---|
| | | | Reductions from Aggregate Dryers (8/6/21); Rule 1147.2 – NOx Reductions from Metal Melting and Heating Furnaces (4/1/22); Rule 1153.1 – Emissions of Oxides of Nitrogen from Commercial Food Ovens (8/4/23); and Rule 1159.1 – Control of NOx Emissions from Nitric Acid Tanks (12/6/24) |
| <u>ECC-02 - Co-Benefits from Existing Residential and Commercial Building Energy Efficiency Measures</u> | <u>0.3</u> | <u><0.1</u> | Co-benefits achieved from implementation of the Clean Energy Pollution Reduction Act of 2015 (SB 350); and ECC-02 - Co-Benefits from Existing and Future Residential and Commercial Building Energy Efficiency Measures |
| <u>ECC-03 - Additional Enhancements in Reducing Existing Residential Building Energy Use</u> | <u>1.2</u> | <u>0.2</u> | Two incentive projects implemented; and ECC-03 - Additional Enhancements in Reducing Existing Residential Building Energy Use |
| <u>BCM-10 - Emission Reductions from Greenwaste Composting</u> | - | <u>1.5</u> | Proposed Amended Rule 1133 – Composting and Related Operations (scheduled for adoption on September 5, 2025) |
| <u>FUG-01 - Improved Leak Detection and Repair</u> | - | <u>2.0</u> | Rule 463 - Organic Liquid Storage (6/7/24) Rule 1148.1 - Oil and Gas Production Wells (8/2/24) Rule 1173 - Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants (11/1/24) Rule 1178 - Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities (9/1/23) |
| <u>CTS-01 - Further Emission Reductions from Coatings, Solvents, Adhesives, and Sealants</u> | - | <u>1.0</u> | Rule 1168 - Adhesive and Sealant Applications (10/6/17) |

* While CMB-05 did not commit any reductions in 2023, 5 tpd of NOx reductions were committed by 2025.

Response to Comment 1-9: As noted in previous responses, the South Coast Ozone Contingency SIP Revision was developed to address contingency measure requirements under CAA sections 172(c)(9) and 182(c)(9). This effort is entirely separate from the CAA section 182(e)(5) contingency measure plan for the 2015 ozone standard that South Coast AQMD must submit to U.S. EPA by December 31, 2033. Nevertheless, South Coast AQMD remains fully committed to achieving all federal air quality standards as expeditiously as possible.

Response to Comment 1-10: The South Coast AQMD Governing Board directed Proposed Amended Rules 1111 and 1121 back to Committee for further review. As explained in Response to Comment 1-4, these rules cannot serve as viable contingency measures.

Response to Comment 1-11: South Coast AQMD appreciates your comments and remains committed to improving air quality and protecting public health in the South Coast Air Basin and Coachella Valley through feasible and innovative control strategies.

**South Coast Air Basin Contingency Measure SIP Revision
for the 2015 8-Hour Ozone NAAQS Standard**

**CHAPTER 6: CALIFORNIA ENVIRONMENTAL QUALITY
ACT AND SOCIOECONOMIC IMPACT ASSESSMENT**

California Environmental Quality Act (CEQA)

Pursuant to the California Environmental Quality Act (CEQA) Guidelines Sections 15002(k) and 15061, the proposed project (South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS Standard) is exempt from CEQA pursuant to CEQA Guidelines Sections 15061(b)(3) and 15308. Further, there is no substantial evidence indicating that the exceptions set forth in CEQA Guidelines Section 15300.2 apply to the proposed project. A Notice of Exemption ~~has been~~ will be prepared pursuant to CEQA Guidelines Section 15062, and if the proposed project is approved, the Notice of Exemption will be filed for posting with the county clerks of Los Angeles, Orange, Riverside, and San Bernardino Counties, and with the State Clearinghouse of the Governor's Office of Planning and Research Land Use and Climate Innovation.

Socioeconomic Impact Assessment

No Socioeconomic Impact Assessment is required pursuant to Health and Safety Code Section 40440.8 or 40728.5 because these sections apply only to rules. Further, no socioeconomic impact will result from the proposed project.

**South Coast Air Basin Contingency Measure SIP Revision
for the 2015 8-Hour Ozone NAAQS Standard**

CHAPTER 7: STAFF RECOMMENDATION

Staff Recommendation

Staff recommends adoption of the South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS Standard and subsequent submission to U.S. EPA via CARB.

**South Coast Air Basin Contingency Measure SIP Revision
for the 2015 8-Hour Ozone NAAQS Standard**

**APPENDIX A: CALIFORNIA SMOG CHECK CONTINGENCY
MEASURE STATE IMPLEMENTATION PLAN REVISION**

California Smog Check Contingency Measure State Implementation Plan Revision

Released: September 15, 2023



Table of Contents

| | |
|---|----|
| California Smog Check Contingency Measure State Implementation Plan Revision..... | 1 |
| Executive Summary..... | 1 |
| Section 1. Contingency Requirements and Litigation..... | 5 |
| Section 2. CARB’s Opportunities for Contingency Measures..... | 7 |
| Section 3. California Smog Check Program..... | 13 |
| Section 4. Smog Check Contingency Measure | 15 |
| A. Implementation | 16 |
| B. Title VI and Environmental Justice..... | 17 |
| C. Fiscal Impacts to State Programs | 20 |
| D. CEQA..... | 23 |
| Section 5. Nonattainment Area Analyses..... | 24 |
| A. Coachella Valley | 24 |
| B. Eastern Kern County..... | 26 |
| C. Mariposa County..... | 28 |
| D. Sacramento Metro Area | 29 |
| E. San Diego County | 31 |
| F. San Joaquin Valley | 33 |
| G. South Coast Air Basin | 36 |
| H. Ventura County..... | 38 |
| I. West Mojave Desert..... | 39 |
| J. Western Nevada County | 41 |
| Section 6. Staff Recommendation..... | 43 |

| | |
|--|----|
| Appendix A: Infeasibility Analysis | 44 |
| Infeasibility Analysis..... | 45 |
| Measure Analysis..... | 45 |
| Appendix B: Smog Check Contingency Measure Emissions Benefits Methodology..... | 59 |
| Smog Check Contingency Measure Emissions Benefits..... | 60 |
| Review Of Current Information | 60 |
| Approach | 61 |
| Instructions For Configuring and Running EMFAC2011..... | 62 |
| Appendix C: Carl Moyer Program Emissions Impacts Analysis Methodology..... | 67 |
| Moyer Program Emissions Reductions Estimates Methodology | 68 |
| Appendix D: California Health and Safety Code § 44011(a)(4)(A) and (B) | 70 |

Executive Summary

The *California Smog Check Contingency Measure State Implementation Plan Revision* (Measure) addresses State Implementation Plan (SIP) contingency measure requirements of the federal Clean Air Act (Act) for certain areas designated as nonattainment of the national ambient air quality standards (NAAQS or standards) within the State. This Measure is necessary to address contingency measure requirements and respond to recent court actions to meet statutory deadlines related to contingency measures. This Measure includes an action that is triggered if a nonattainment area fails to attain by the applicable attainment date, fails to meet a reasonable further progress (RFP) milestone, fails to meet a quantitative milestone, or fails to submit a required quantitative milestone report or milestone compliance demonstration (collectively referred to as "Triggering Events").

The Motor Vehicle Inspection and Maintenance Program (Smog Check Program) is a vehicle inspection and maintenance program administered by the California Bureau of Automotive Repair (BAR) that identifies vehicles with faulty emission control components. Smog Check inspections are required biennially as a part of the vehicle registration process and/or when a vehicle changes ownership or is registered for the first time in California. In 2017, Assembly Bill (AB) 1274 added Health and Safety Code (H&SC) § 44011(a)(4)(B)(ii) which allowed vehicles eight or less model-years old to be exempt from requirements for Smog Check inspections. In lieu of an inspection, this law requires seven and eight model-year old vehicles owners to pay an annual Smog Abatement Fee of \$25, \$21 of which goes to the Air Pollution Control Fund for use to incentivize clean vehicles and equipment through the Carl Moyer Memorial Air Quality Standards Attainment Program (Moyer Program). This law also specifies that this exemption is allowed unless CARB determines that exempting these vehicles prohibits the State from meeting SIP commitments. At that time, the AB 1274 analysis¹ indicated that the emissions reductions from the increase in funding to the Moyer Program would outweigh the benefits of requiring seven and eight model-year old vehicles to obtain a Smog Check inspection.

CARB staff has now determined that removal of these exemptions may be needed to meet the contingency measure SIP requirements. CARB staff has also determined that in all of the relevant nonattainment areas, requiring a Smog Check inspection on eight model-year old vehicles provides more emission reductions than the potential loss in Moyer Program emission reductions that would result from the foregone funding. In 2017, when AB 1274 enacted this change in Smog Check exemptions, the benefit from additional funding for Moyer Program projects was estimated to outweigh the disbenefit from exempting additional vehicles. However, since 2017 the Program has successfully incentivized the

¹ *Bill Analysis - AB-1274 Smog check: exemption. (ca.gov)*

turnover of many dirty engines and equipment and Moyer Program projects are now less cost-effective than before, resulting in a net benefit from this Measure.

If a Triggering Event occurs, the Measure would:

- Change the existing smog check inspection exemptions in the California Smog Check Program in the applicable nonattainment area(s);
- Apply to the California nonattainment area(s) and standard(s) for which the Triggering Event occurs, from those listed on the next page in Table 1.; and
- Be implemented within 30 days of the effective date of a U.S. EPA finding that a Triggering Event occurred.

Seven areas in California under State jurisdiction are designated as nonattainment for the 75 parts per billion (ppb) 8-hour ozone standard, and ten areas in California under State jurisdiction are designated as nonattainment for the 70 ppb 8-hour ozone standard, with classifications of Moderate, Serious, Severe or Extreme. Additionally, the San Joaquin Valley is designated as nonattainment for the 80 ppb 8-hour ozone standard, the 12 microgram per meter cubed ($\mu\text{g}/\text{m}^3$) annual, 15 $\mu\text{g}/\text{m}^3$ annual, and 35 $\mu\text{g}/\text{m}^3$ 24-hour PM_{2.5} standards. The South Coast Air Basin is also designated as nonattainment for the 12 $\mu\text{g}/\text{m}^3$ annual PM_{2.5} standard. For all of these standards, nonattainment areas were or will be required to submit SIP revisions meeting contingency measure and other applicable requirements of the Act.

CARB staff has worked with local air districts to prepare contingency measure SIP revisions which were adopted and submitted to the U.S. Environmental Protection Agency (U.S. EPA) through CARB. Further, in 2018, CARB staff submitted the [*2018 Updates to the California State Implementation Plan*](#) (2018 SIP Update) which included a statewide contingency measure that was developed following U.S. EPA guidance available at the time. However, multiple lawsuits challenging U.S. EPA's interpretation of the Act led to U.S. EPA's determination that the previously submitted 2018 SIP Update contingency measures did not fully meet the Act's requirements. CARB staff is now proposing to submit the Measure to be consistent with U.S. EPA's current interpretation of the contingency measure provisions of the Act. The Measure as included in this SIP revision will be applicable for the California nonattainment areas and standards as listed in Table 1.

Table 1. Nonattainment Areas and Applicable Standards

| Area | Applicable Standards |
|-----------------------|--|
| Coachella Valley | 70 ppb Ozone, 75 ppb Ozone |
| Eastern Kern County | 70 ppb Ozone, 75 ppb Ozone |
| Mariposa County | 70 ppb Ozone |
| Sacramento Metro Area | 70 ppb Ozone, 75 ppb Ozone |
| San Diego County | 70 ppb Ozone, 75 ppb Ozone |
| San Joaquin Valley | 70 ppb Ozone, 75 ppb Ozone, 80 ppb Ozone, 15 µg/m ³ PM2.5, 35 µg/m ³ PM2.5, 12 µg/m ³ PM2.5 |
| South Coast Air Basin | 12 µg/m ³ PM2.5, 70 ppb Ozone, 75 ppb Ozone |
| Ventura County | 70 ppb Ozone |
| Western Mojave Desert | 70 ppb Ozone, 75 ppb Ozone |
| Western Nevada | 70 ppb Ozone |

CARB staff initiated the public process with release of a concept document and workshop in August 2023 to solicit input from the public. The concept document and other materials were available in English and Spanish, and the workshop provided a forum in both English and Spanish for the proposed Measure to be discussed in a public setting and provide additional opportunity for public feedback, input, and ideas. CARB staff also analyzed the impacts of the Measure on vehicle owners in disadvantaged communities (DACs). CARB staff compared the proportion of the vehicles subject to the Measure if triggered to those registered in DACs to the proportion of vehicles subject to the Measure in total using DMV data. CARB staff found that, in all nonattainment areas, the proportion of vehicle owners potentially impacted by the Measure, if triggered, is not disproportionate to the population as a whole.

CARB staff has determined that the Measure meets the Act contingency measure requirements and that exercising H&SC § 44011(a)(4)(B)(ii) is needed to meet the SIP requirements.

Further, CARB staff last submitted updates to the Smog Check Program to U.S. EPA for incorporation into the California SIP in 2009 and U.S. EPA approved them on July 1, 2010.² As previously mentioned, the additional exemptions from the Smog Check Program were made by AB 1274 in 2017. As a part of this SIP revision, CARB staff is submitting H&SC § 44011(a)(4)(A) and (B) into the California SIP to incorporate these changes in the Smog Check Program.

The Board is scheduled to consider the Measure on October 26, 2023. CARB staff recommends the Board to adopt the Measure addressing contingency measure requirements for the applicable standards and nonattainment areas as listed in Table 1 and approve submittal into the California SIP of California H&SC sections 44011(a)(4)(A) and (B). If adopted, CARB staff will submit the Measure and H&SC sections 44011(a)(4)(A) and (B) to U.S. EPA as a revision to the California SIP.

² 75 Fed. Reg. 38023 (July 1, 2010)

Section 1. Contingency Requirements and Litigation

The Clean Air Act (“Act”) specifies that SIPs must provide for contingency measures, defined in section 172(c)(9) as “specific measures to be undertaken if the area fails to make reasonable further progress (RFP), or to attain the national primary ambient air quality standard by the attainment date....”³ The Act is silent though on the specific level of emission reductions that must flow from contingency measures. In the absence of specific requirements for the amount of emission reductions, in 1992, U.S. EPA conveyed that the contingency measures should, at a minimum, ensure that an appropriate level of emissions reduction progress continues to be made if attainment of RFP is not achieved and additional planning by the State is needed (57 Federal Register 13510, 13512 (April 16, 1992)). While U.S. EPA’s ozone guidance states “contingency measures should represent one year’s worth of progress amounting to reductions of 3 percent of the baseline emissions inventory for the nonattainment area”, U.S. EPA has accepted contingency measures that equal less than one year’s worth of RFP in some situations. Specifically, U.S. EPA has historically accepted lesser amounts as they see appropriate considering “U.S. EPA’s long-standing recommendation that states should consider ‘the potential nature and extent of any attainment shortfall for the area’ and that contingency measures ‘should represent a portion of the actual emissions reductions necessary to bring about attainment in the area.’”⁴

In recent years, court decisions, as described below, have excluded a category of contingency measures from what U.S. EPA may properly approve. Historically, U.S. EPA allowed contingency measure requirements to be met via excess emission reductions from ongoing implementation of adopted emission reduction programs. In the past, CARB used this method to meet contingency measure requirements. In 2016, in *Bahr v. U.S. Environmental Protection Agency*⁵ (*Bahr*), the Ninth Circuit determined U.S. EPA erred in approving a contingency measure that relied on an already-implemented measure for a nonattainment area in Arizona, thereby rejecting U.S. EPA’s longstanding interpretation of section 172(c)(9) of the Act. U.S. EPA staff interpreted this decision to mean that contingency measures must include a future action triggered by a Triggering Event. This decision was applicable to only the states covered by the Ninth Circuit. In the rest of the country, U.S. EPA still allowed contingency measures using their pre-*Bahr* stance. In January 2021, in *Sierra Club v. Environmental Protection Agency*⁶, the United States Court of Appeals for the D.C. Circuit, ruled that already implemented measures do not qualify as contingency measures for the rest of the country (*Sierra Club*).

³ 42 U.S.C. § 7502(c)(9).

⁴ See, e.g. 78 Fed.Reg. 37741, 37750 (Jun. 24, 2013), approval finalized with 78 Fed.Reg. 64402 (Oct. 29, 2013).

⁵ *Bahr v. U.S. Environmental Protection Agency*, (9th Cir. 2016) 836 F.3d 1218.

⁶ *Sierra Club v. Environmental Protection Agency*, (D.C. Cir. 2021) 985 F.3d 1055.

In response to *Bahr* and as part of the 75 ppb 8-hour ozone SIPs due in 2016, CARB staff developed the statewide Enhanced Enforcement Contingency Measure (Enforcement Contingency Measure) as a part of the *2018 Updates to the California State Implementation Plan* to address the need for a triggered action as a part of the contingency measure requirement. CARB staff worked closely with U.S. EPA regional staff in developing the contingency measure package that included the triggered Enforcement Contingency Measure, a district triggered measure and emission reductions from implementing CARB's mobile source emissions program. However, as part of the *San Joaquin Valley 2016 Ozone Plan for 2008 8-hour Ozone Standard* SIP action, U.S. EPA wrote in their final approval that the Enforcement Contingency Measure did not satisfy requirements to be approved as a "standalone contingency measure" and approved it only as a "SIP strengthening" measure⁷. U.S. EPA did approve the San Joaquin Valley Air Pollution Control District triggered measure and the implementation of the mobile reductions along with a CARB emission reduction commitment as meeting the contingency measure requirement for this SIP.

Subsequently, the Association of Irrigated Residents filed a lawsuit against the U.S. EPA for its approval of various elements within the *San Joaquin Valley 2016 Ozone Plan for 2008 8-hour Ozone Standard*, including the contingency measure. The Ninth Circuit issued its decision in *Association of Irrigated Residents v. EPA*⁸ (*AIR*) that U.S. EPA's approval of the contingency element was arbitrary and capricious and rejected the triggered contingency measure that achieves much less than one year's worth of RFP. Most importantly, the Ninth Circuit said that, in line with U.S. EPA's longstanding interpretation of what is required of a contingency measure and the purpose it serves, together with *Bahr*, all reductions needed to satisfy the Act's contingency measure requirements must come from the contingency measure itself. The Ninth Circuit also said that the amount of reductions needed for contingency should not be reduced absent U.S. EPA adequately explaining its change from its historic stance on the amount of reductions required. U.S. EPA staff has interpreted *AIR* to mean that triggered contingency measures must achieve the entirety of the amount of emission reductions needed for the contingency measure requirement on their own. In addition, surplus emission reductions from ongoing programs cannot reduce the amount of reductions needed for the contingency measure requirements.

In response to *Bahr* and *Sierra Club*, in 2021, U.S. EPA convened a nationwide internal task force to develop guidance to support states in their development of contingency measures. The draft guidance was released in March 2023 and is currently undergoing a public review process. The draft guidance proposes a new method for how to calculate one year's worth of progress for the targeted amount of contingency measures reductions and provides new clarification on the reasoned justification U.S. EPA requires to facilitate approval of contingency measures with lesser amounts of reductions. Per the draft guidance, such a

⁷ 87 Fed. Reg. 59688 (October 3, 2022)

⁸ *Association of Irrigated Residents v. U.S. Environmental Protection Agency*, (9th Cir. 2021) 10 F.4th 937

reasoned justification would need to include an infeasibility analysis detailing why there are insufficient measures to meet one year's worth of progress. U.S. EPA relied on the draft guidance when they proposed a federal implementation plan to meet the PM2.5 contingency measure requirements in the San Joaquin Valley on August 8, 2023⁹.

Section 2. CARB's Opportunities for Contingency Measures

Much has changed since U.S. EPA's 1992 guidance on contingency measures. Control programs across the country have matured as have the health-based standards. U.S. EPA strengthened ozone standards in 1997, 2008 and 2015 with attainment dates out to 2037 for areas in "extreme" nonattainment. California has the only three extreme ozone nonattainment areas in the country for the 2015 ozone NAAQS. Extreme ozone nonattainment areas are allowed to use a provision in the Act where emission reduction measures can wait for technology to advance. California also has multiple PM2.5 nonattainment areas with the highest possible classification and greatest attainment challenges. Thus, control measures are needed for meeting the NAAQS as expeditiously as possible, rather than being held in reserve.

To address contingency measure requirements given the courts' decisions and U.S. EPA's draft guidance, CARB staff and local air districts would need to develop a measure or measures that, when triggered by a Triggering Event, will achieve one year's worth of progress for the given nonattainment area unless it is determined that it is infeasible to achieve one year's worth of emission reductions. Given CARB's wide array of mobile source control programs, the relatively limited portion of emissions primarily regulated by the local air districts, and the fact that primarily-federally regulated sources are expected to account for approximately 52 percent of statewide nitrogen oxides (NOx) emissions by 2037¹⁰, finding triggered measures that will achieve the required reductions is nearly impossible. That said, even discounting the amount to reflect the proportion of sources that are primarily federally regulated, additional control measures that can be identified by CARB staff are scarce or nonexistent that would achieve the required emissions reductions needed for a contingency measure.

Adding to the difficulty of identifying available control measures, not only does the suite of contingency measures need to achieve a large amount of reductions, but they will also need to achieve these reductions in the year following the year in which the Triggering Event has been identified. Although the newly released draft guidance proposes allowing for up to two years to achieve those reductions, control measures achieving the level of reductions required often take more than two years to implement and will likely not result in immediate reductions. In California's 2022 State SIP Strategy, CARB's three largest NOx reduction

⁹ 88 Fed. Reg. 53431 (August 8, 2023)

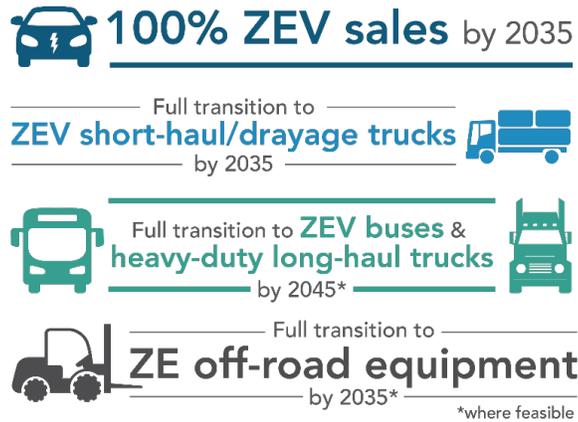
¹⁰ Source: CARB 2022 CEPAM v1.01; based on 2037 emissions totals.

measures, In-Use Locomotive Regulation, Advanced Clean Fleets, and Transportation Refrigeration Unit II, rely on accelerated turnover of older engines/trucks. The need for buildout of potential infrastructure upgrades and market-readiness of new equipment options that meet requirements limits the availability to have significant emission reductions in a short amount of time. Options for a technically and economically feasible triggered measure that can be implemented and achieve the necessary reductions in the time frame required are scarce in California.

CARB has over 50 years of experience reducing emissions from mobile sources like cars and trucks, as well as other sources of pollution under State authority. The Reasonably Available Control Measures for State Sources analysis that CARB included in all of the 70 ppb 8-hour ozone SIPs illustrates the reach of CARB's current programs and regulations, many of which set the standard nationally for other states to follow. Few sources CARB has primary regulatory authority over remain without a control measure, and all control measures that are in place support the attainment of the NAAQS. There is a lack of additional control measures that would be able to achieve the necessary reductions for a contingency measure. Due to the unique air quality challenges California faces, should such additional measures exist, CARB would pursue those measures to support expeditious attainment of the NAAQS and would not reserve such measures for contingency purposes. Nonetheless, CARB staff has continued to explore options for potential statewide contingency measures utilizing its authorities and applying draft guidance.

A central difficulty in considering a statewide contingency measure under CARB's authority, is that CARB is already fully committed to driving sources of air pollution in California to zero-emission everywhere feasible and as expeditiously as possible. In 2020, Governor Newsom signed Executive Order N-79-20 ([Figure 1](#)) that established a first-in-the-nation goal for 100 percent of California sales of new passenger cars and trucks to be zero emission by 2035. The Governor's order also set a goal to transition 100 percent of the drayage truck fleet to zero-emission by 2035, all off-road equipment where feasible to zero-emission by 2035, and the remainder of the medium and heavy-duty vehicles to zero-emission where feasible by 2045.

Figure 1 - Governor Newsom Executive Order N-79-20



California is committed to achieving these goals, and CARB is pursuing an aggressive control program in conjunction with other state and local agencies. CARB’s programs not only go beyond emissions standards and programs set at the federal level, but many include zero-emissions requirements or otherwise, through incentives and voluntary programs, that drive mobile sources to zero-emissions, as listed in Table 2 below. CARB is also exploring and developing a variety of new measures to drive more source categories to zero-emissions and reduce emissions even further, as detailed in the 2022 State SIP Strategy. With most source categories being driven to zero-emissions as expeditiously as possible, opportunities for having triggered measure that could reduce NOx, reactive organic gases (ROG) and PM2.5 emissions by the amount required for contingency measures are scarce.

Table 2. Emissions Sources and Respective CARB Programs with a Zero-Emissions Requirement/Component

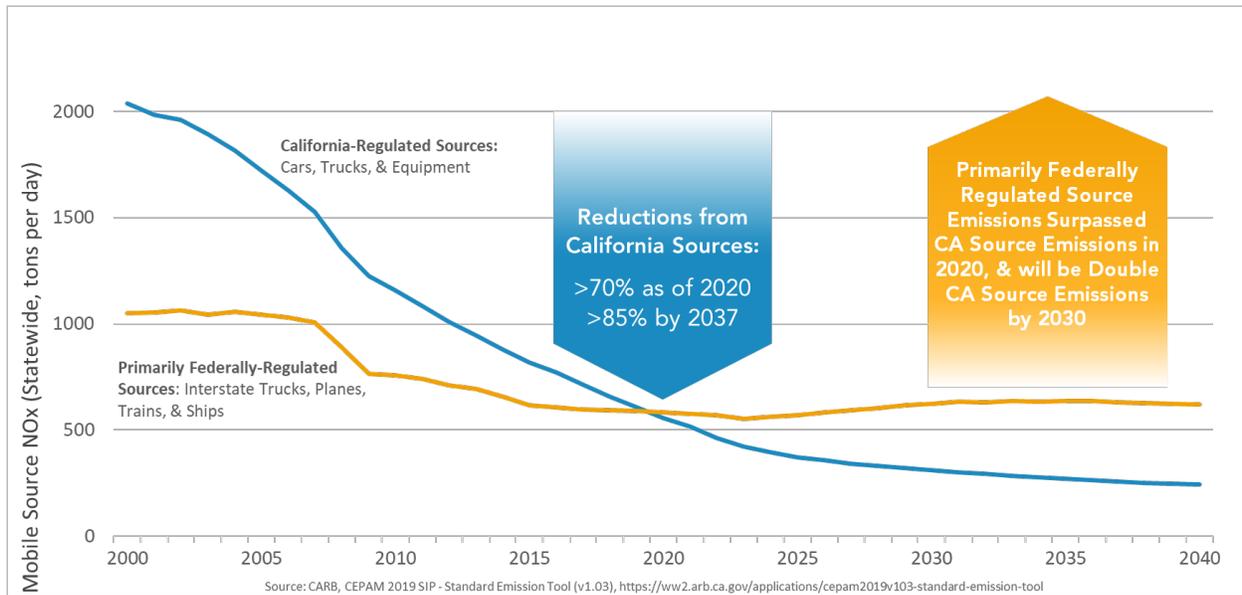
| Emission Source | Regulatory Programs |
|---|---|
| Light-Duty Passenger Vehicles and Light-Duty Trucks | <ul style="list-style-type: none"> • Advanced Clean Cars Program (I and II), including the Zero Emission Vehicle Regulation • Clean Miles Standard |
| Motorcycles | <ul style="list-style-type: none"> • On-Road Motorcycle Regulation* |
| Medium Duty-Trucks | <ul style="list-style-type: none"> • Advanced Clean Cars Program (I and II), including the Zero Emission Vehicle Regulation • Zero-Emission Powertrain Certification Regulation • Advanced Clean Trucks Regulation • Advanced Clean Fleets Regulation |
| Heavy-Duty Trucks | <ul style="list-style-type: none"> • Zero-Emission Powertrain Certification Regulation • Advanced Clean Trucks Regulation • Advanced Clean Fleets Regulation |
| Heavy-Duty Urban Buses | <ul style="list-style-type: none"> • Innovative Clean Transit • Advanced Clean Fleets Regulation |
| Other Buses, Other Buses - Motor Coach | <ul style="list-style-type: none"> • Zero-Emission Airport Shuttle Regulation • Advanced Clean Fleets Regulation |
| Commercial Harbor Craft | <ul style="list-style-type: none"> • Commercial Harbor Craft Regulation |
| Recreational Boats | <ul style="list-style-type: none"> • Spark-Ignition Marine Engine Standards* |
| Transport Refrigeration Units | <ul style="list-style-type: none"> • Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (Parts I and II*) |
| Industrial Equipment | <ul style="list-style-type: none"> • Zero-Emission Forklifts* • Off-Road Zero-Emission Targeted Manufacturer Rule* |
| Construction and Mining | <ul style="list-style-type: none"> • Off-Road Zero-Emission Targeted Manufacturer Rule* |
| Airport Ground Support Equipment | <ul style="list-style-type: none"> • Zero-Emission Forklifts* |
| Port Operations and Rail Operations | <ul style="list-style-type: none"> • Cargo Handling Equipment Regulation • Off-Road Zero-Emission Targeted Manufacturer Rule* |
| Lawn and Garden | <ul style="list-style-type: none"> • Small Off-Road Engine Regulation • Off-Road Zero-Emission Targeted Manufacturer Rule* |
| Ocean-Going Vessels | <ul style="list-style-type: none"> • At Berth Regulation |
| Locomotives | <ul style="list-style-type: none"> • In-Use Locomotive Regulation |

*Indicates program or regulation is in development

Most air pollution sources in California that are not as well controlled are primarily-federally regulated sources. (Figure 2). This includes interstate trucks, ships, locomotives, aircraft, and certain categories of off-road equipment, constituting a large source of potential emissions reductions. Since these are primarily regulated at the federal and, in some cases,

international level, options to implement a contingency measure with reductions approximately equivalent to one year's worth of progress are limited.

Figure 2 - State vs. Federal Mobile Source NOx Emissions



CARB staff has analyzed CARB's suite of control measures for all sources under CARB authority to identify potential contingency measure options. CARB currently has programs in place or under development for most sources and have evaluated a variety of regulatory mechanisms within existing and new programs for potential contingency triggers. After conducting a full analysis of measures for contingency measure opportunities, CARB staff determined that changes in the Smog Check Program are appropriate to use to meet the Act contingency measure requirement. The Measure was found to be the most feasible option given timing and technical constraints for adoption and implementation. The full infeasibility analysis can be found in Appendix A. Further, U.S. EPA recently released their own infeasibility analysis¹¹ in which they came to the same conclusion with respect to the scarcity of available contingency measures in CARB's mobile source control programs.

With this proposal, CARB staff would adopt and submit the Measure for the 70 ppb 8-hour ozone, 75 ppb 8-hour ozone, 80 ppb 8-hour ozone, the 12 µg/m³ and 15 µg/m³ annual PM_{2.5}, and 35 µg/m³ 24-hour PM_{2.5} standards for the relevant nonattainment areas to address the contingency measure requirements of the Act as interpreted by U.S. EPA in the draft guidance. The Measure consists of a triggered contingency measure that, if triggered,

¹¹ EPA Source Category and Control Measure Assessment and Reasoned Justification Technical Support Document; Federal Implementation Plan for Contingency Measures for the Fine Particulate Matter Standards; San Joaquin Valley, California. <https://www.regulations.gov/docket/EPA-R09-OAR-2023-0352>

would change the exemptions for motor vehicles in the California Smog Check Program for the relevant local air district and applicable standard as specified in Table 1 that, together with the local air districts' contingency measures, addresses the contingency measure requirements of the Act. A detailed description of the Measure is described in Section 4 below.

Section 3. California Smog Check Program

The Smog Check Program is a vehicle inspection and maintenance program administered by BAR. The Smog Check Program aims to reduce air pollution in the state by identifying vehicles with harmful excess emissions for repair or retirement. While BAR administers the Program, the California Department of Motor Vehicles (DMV) provides the vehicle registration and licensing information to support administration and enforcement of the Smog Check Program. Smog Check inspections are required biennially as a part of the vehicle registration process and/or when a vehicle changes ownership or is registered for the first time in California, depending on the area and severity of the air quality problem. Certain areas with worse air quality issues are subject to an enhanced version of the Program with stricter requirements. All gasoline-powered vehicles, hybrid vehicles, and alternative-fuel vehicles that are model-year 1976 and newer, as well as all diesel vehicles model-year 1998 and newer with a gross-vehicle weight rating of 14,000 pounds and less, are subject to Smog Check inspections.

However, there are several exceptions. Motorcycles and electric-powered vehicles are not subject to the Smog Check Program. Additionally, in 2017, California Assembly Bill (AB) 1274 was enacted, which amended the H&SC to exempt vehicles up to eight model -years old (MYO); previously, vehicles had been exempt up to six MYO. These seven and eight MYO vehicles that would otherwise be subject to a Smog Check inspection must pay an annual Smog Abatement Fee of \$25, \$21 of which goes to the Air Pollution Control Fund for use through the Moyer Program. Per H&SC § 44011(a)(4)(B)(ii), these motor vehicles eight or less MYO are exempted from biennial Smog Check inspection, unless CARB finds that providing an exception for these vehicles will prohibit the state from meeting the state commitments with respect to the SIP.

In 2017, when this change in Smog Check exemptions was enacted, the benefit from additional funding for Moyer Program projects was estimated to outweigh the disbenefit from exempting additional vehicles. However, since 2017, the cost-effectiveness of Moyer Program projects has increased as the program has successfully incentivized the turnover of many dirty engines and equipment. Moyer Program projects are now less cost-effective than before, resulting in a net benefit from this Measure.

As such, the ability to make the relevant finding for H&SC § 44011(a)(4)(B)(ii) purposes is within CARB's authority, and the other State agencies that implement California's Smog Check Program will be bound by it. CARB staff last submitted updates to the Smog Check Program to U.S. EPA for incorporation into the California SIP in 2009 and approved by U.S. EPA on July 1, 2010.¹² As previously mentioned, the additional exemptions from the Smog Check Program were made by AB 1274 in 2017. As a part of this SIP revision, CARB

¹² 75 Fed. Reg. 38023 (July 1, 2010)

staff is also proposing the Board approve submittal of H&SC § 44011(a)(4)(A) and (B) into the California SIP to incorporate these changes in the Smog Check Program. The H&SC sections are included in Appendix D.

Further the Smog Check Program meets federal requirements for an inspection and maintenance (I/M) program. On March 23, 2023, CARB adopted the California Smog Check Performance Standard Modeling (PSM) and Program Certification for the 70 parts per billion (ppb) 8-hour Ozone Standard (Smog Check Certification) to address I/M SIP requirements for the 70 ppb 8-hour ozone standard. CARB staff submitted it to U.S. EPA as a SIP revision. The Smog Check Certification demonstrated that the California's Smog Check Program meets the applicable federal I/M program requirements for all the 70 ppb 8-hour ozone nonattainment areas in California.

Section 4. Smog Check Contingency Measure

The Measure will consist of changing the existing Smog Check inspection exemptions in California's Smog Check Program in any applicable nonattainment area listed in Table 1. that fails to satisfy any one of the following (failures of which are collectively referred to as "Triggering Events"):

- Attain by the applicable attainment date;
- Meet a reasonable further progress (RFP) milestone;
- Meet a quantitative milestone; or
- Submit a required quantitative milestone report or milestone compliance demonstration.

The Measure will be initiated within 30 days of the effective date of a U.S. EPA determination of a Triggering Event. The exemption will change from the existing eight or less MYO to seven or less MYO in the applicable nonattainment area. If triggered, these additional vehicles would then be subject to Smog Check inspections based on the area in which the vehicle is registered (i.e., enhanced, basic, and change of ownership), resulting in additional emissions control equipment failures being identified and corrected, thereby reducing emissions that typically result when emissions control equipment is not performing as designed. The emissions reduction estimates from the Measure are detailed for each nonattainment area in Section 5 of this report. The methodology for calculating these estimates can be found in Appendix B. The Measure can be triggered a second time for a nonattainment area; if triggered a second time, the Smog Check exemption would then only apply to vehicles six or less MYO.

Implementation of the Measure will require coordination with other California State agencies. Their relevant roles and responsibilities are outlined below.

- **Bureau of Automotive Repair:** BAR, as part of the Department of Consumer Affairs, provides oversight of the automotive repair industry and administers vehicle emissions reduction and safety programs. Specifically, as it pertains to the Measure, BAR administers and enforces the Smog Check Program.
- **California Department of Motor Vehicles:** DMV administers vehicle registration and licensing and supports BAR in administering the Smog Check Program.

CARB staff will work closely with BAR and DMV staff throughout the process and leading up to a possible Triggering Event, so that both agencies have as much notice as possible for the work that will be required for full implementation of the Measure. For most potential failures to attain a relevant standard, preliminary data for the relevant ozone or PM2.5 season is available earlier and U.S. EPA makes their failure to attain findings six months after the attainment date, so CARB staff will be able to notify and work with BAR and DMV preemptively to ensure the Measure implementation is as smooth as possible.

CARB staff has quantified the emission reductions that would be achieved from implementation of the Measure, if triggered, and have documented the results in Section 5 of this report. The emission reductions anticipated are surplus to the current Smog Check Program in the nonattainment areas and they are not otherwise required by or assumed in a SIP-related program, or any other adopted State air quality program. The changes to Smog Check exemptions are enforceable since DMV requires a vehicle owner to obtain a Smog Check inspection certificate indicating a vehicle has passed its Smog Check inspection to renew their vehicle registration. The reductions from the Measure are permanent in that, if triggered, the vehicle will need to be repaired in order to renew their registration.

A. Implementation

Within 30 days of the effective date of U.S. EPA determining an applicable Triggering Event occurred, CARB will transmit a letter to BAR and DMV conveying its finding under H&SC § 44011(a)(4)(B)(ii) that providing the exception for certain motor vehicles from Smog Check inspection in specific nonattainment areas (defined by specified ZIP Codes) will prohibit the State from meeting commitments with respect to the SIP as required by the Act. This letter will explain that the Measure is being triggered to meet contingency measure requirements under Act section 172(c)(9) and/or 182(c)(9), and effectuating the change to the Smog Check exemptions for motor vehicles from eight or less MYO to seven or less MYO throughout the applicable nonattainment area (or six or less MYO in cases of the second trigger).

Prior to CARB staff submitting a letter to BAR and DMV, CARB staff will coordinate with BAR and DMV if there is potential for contingency to be triggered in the nonattainment areas in Table 1. CARB staff will meet regularly with BAR and DMV staff throughout the process to implement this Measure. Upon receipt of the CARB letter and the applicable ZIP Codes, CARB, BAR and DMV staff will begin implementation of the change in exemption length to Smog Check and take the following actions:

- DMV will update their Smog Check renewal programming to require a Smog Check inspection for the eight MYO vehicles (or seven MYO in the case of a second trigger) in the ZIP Codes provided by CARB staff;
- The eight to seven MYO (or seven to six MYO) exemption change will begin for registrations expiring beginning January 1st of the applicable year considering the time it takes for DMV to program this change and their registration renewal process;
- 60 days before the expiration date of the vehicle registration, DMV will send out registration renewals that include these newly impacted vehicles along with those already subject to Smog Check inspection;
- The notice will include information on the change in exemptions, reason for change, and resources for obtaining a Smog Check inspection from a certified station;

- CARB staff will work with DMV to develop and include an informational paper that will accompany the registration renewal with the information as included in the notice; and
- BAR and DMV will administer and enforce the new changes to the Smog Check Program.

B. Title VI and Environmental Justice

Title VI of the Civil Rights Act of 1964 (Title VI) provides that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. Other relevant federal laws prohibit discrimination in the use of federal funds based on disability, sex, and age.¹³ As a recipient of federal funds, CARB must ensure it complies with Title VI and U.S. EPA's Title VI implementation regulations¹⁴ in its relevant programs and policies.

CARB's public process to engage with stakeholders in development of the Measures, its equity analysis of the Measure, and information about CARB's Civil Rights Policy and Compliant process is summarized below.

Public Process

In developing the proposed Measure, CARB staff engaged in a thorough public process that addresses the requirements of Title VI. CARB staff initiated the public process with release of a concept document and hosting a remote online workshop in August 2023 to solicit input from the public.¹⁵ The workshop was hosted through Zoom in the late afternoon to allow more community members to participate without needing to travel. The public notice for the workshop provided a contact for special accommodation requests by interested stakeholders, and CARB staff also made available on the notice and its website a staff email address to accept public questions and comments. The concept document and other materials were available in English and Spanish on the website and through emails sent to relevant email list serves, including the Environmental Justice Stakeholders Group. The workshop included translation services that provided a forum in both English and Spanish for the proposed Measure to be discussed in a public setting and provide additional opportunity for public feedback, input, and ideas. After the workshop, CARB staff

¹³ Section 504 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. § 794; Title IX of the Education Amendments of 1972, as amended, 20 U.S.C. §§ 1681 et seq.; Age Discrimination Act of 1975, 42 U.S.C. §§ 6101 et seq.; and Federal Water Pollution Control Act Amendments of 1972, Pub. L. 92-500 § 13, 86 Stat. 903 (codified as amended at 33 U.S.C. § 1251 (1972)).

¹⁴ 40 C.F.R. Part 7.

¹⁵

has made the recording of the workshop available on its website. CARB staff considered the public feedback it received in developing the Measure. CARB staff will continue to address the requirements of Title VI in the event implementation of the Measure is triggered and provide continuing opportunities for public feedback.

Racial Equity, Environmental Justice, and Equity Analysis

Central to CARB's mission is the commitment to racial equity and environmental justice and ensuring a clean and healthy environment for all Californians. Many low-income and overburdened communities within the nonattainment areas, and across the State, continue to experience disproportionately high levels of air pollution and the resulting detrimental impacts to their health. To address longstanding environmental and health inequities from elevated levels of criteria pollutants (and toxic air contaminants), CARB prioritizes environmental justice, incorporating racial equity, and conducting meaningful community engagement in its policy and planning efforts and programs. It is imperative to optimize California's control programs to maximize emissions reductions and provide targeted near-term benefits in those communities that continue to bear the brunt of poor air quality.

Across the agency, CARB is engaged in specific localized efforts include development of community air monitoring networks to learn about local exposures, development of a racial equity assessment lens to consider benefits and burdens of CARB programmatic work in the planning stages, continuously increasing and improving community engagement efforts, and implementation of Assembly Bill (AB) 617 (C. Garcia, Chapter 136, Statutes of 2017), known as the Community Air Protection Program¹⁰. Significant progress has been made to address air pollution statewide and in local communities, and it is imperative to also ensure all Californians have access to healthy air quality.

Specific to this Measure, given the existing disproportionate impacts overburdened communities already face, CARB staff sought to evaluate whether the proposed Measure would itself impact disproportionately burden certain communities. In conducting this evaluation, CARB staff analyzed whether there would be disproportionate impact on disadvantaged communities within the affected nonattainment areas if the Measure is triggered.

CARB staff also analyzed the impacts of the Measure on vehicle owners in disadvantaged communities (DACs). CARB staff evaluated the potential impacts on owners of 8 MYO vehicles that reside in disadvantaged communities (DACs), which are defined by California Senate Bill 535¹⁶ as census tracts receiving the highest 25 percent of overall scores in *CalEnviroScreen 4.0*¹⁷. These communities face the highest air pollution and other

¹⁶ De Leon, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201120120SB535

¹⁷ <https://oehha.ca.gov/calenviroscreen>

environmental burdens, and CARB staff is working to ensure that policy changes do not have a negative disproportionate impact on these populations.

In order to evaluate whether vehicle owners in DACs will be disproportionately impacted by this Measure if it is triggered, CARB staff compared the proportion of 8 MYO vehicles subject to the Smog Check inspection that are registered in DACs in each nonattainment area to the proportion of vehicles that are subject to the Smog Check inspection at some point in their lifetime that are registered in DACs for each nonattainment area. CARB staff used DMV data reflecting vehicle registrations as of 2021; thus, model year 2013 was used to represent 8 MYO vehicles and calculate the proportion of vehicles subject to the change. CARB staff assumes that the proportion of 8 MYO vehicles subject to the Smog Check inspection will be approximately equivalent in future attainment years. Based on this analysis for all areas in Table 1, CARB staff found that the proportion of vehicle owners potentially impacted by the Measure, if triggered, is not disproportionate to the population as a whole in each of the nonattainment areas analyzed. The proportion of people impacted with vehicles registered in DACs is about equal to the proportion of vehicle owners residing in DACs area-wide and generally represent a relatively small portion of the total population being impacted.

$$\frac{\text{8MYO vehicles registered in DACs in nonattainment area}}{\text{8MYO vehicles registered in nonattainment area}} = \frac{\text{all vehicles registered in DACs in nonattainment area}}{\text{all vehicles registered in nonattainment area}}$$

If the Measure is triggered, though, there could be other potential impacts to vehicle owners that should be considered. The main impacts to vehicle owners are the additional monetary cost and time of obtaining a Smog Check inspection and potential repairs one year earlier than previously required. The inspection and certification costs are mostly offset by the Smog Abatement Fee that exempted vehicle owners must pay. A Smog Check inspection averages \$55 and is required every other year in most areas of the State. The Smog Abatement Fee is \$25 and paid annually as a part of renewal of vehicle registration, thus two years of the Smog Abatement Fee is roughly equivalent to the average cost of a Smog Check Inspection.

Repair costs can range, but generally cost \$750 on average, which could be a significant cost burden. However, financial assistance is available through BAR's Consumer Assistance Program, which provides up to \$1,200 for repair costs. In terms of time to obtain a Smog Check inspection which can vary significantly due to location, many vehicles require regular service throughout the year, and owners may be able to schedule a Smog Check inspection concurrently. Additionally, the potential foregone dollars to the Moyer Program may reduce additional opportunities for emission reductions in districts where the local air district dedicates Moyer Program funds exclusively to disadvantaged communities. CARB staff will

continue to explore additional activities or funding opportunities to mitigate these potential disproportionate impacts.

Civil Rights Policy and Discrimination Complaint Process

Under CARB's written Civil Rights Policy and Discrimination Complaint process (Civil Rights Policy), CARB has a policy of nondiscrimination in its programs and activities and implements a process for discrimination complaints filed with CARB, which is available on CARB's website. The Civil Rights Officer coordinates implementation of CARB's nondiscrimination activities, including as the Equal Employment Opportunity (EEO) Officer for employment purposes, and who can be reached at *EEOP@arb.ca.gov*, or (279) 208-7110.¹⁸

The Civil Rights Policy and Discrimination Complaint Process provides the following information about the nondiscrimination policy and its applicability:

It is the California Air Resources Board (CARB) policy to provide fair and equal access to the benefits of a program or activity administered by CARB. CARB will not tolerate discrimination against any person(s) seeking to participate in, or receive the benefits of, any program or activity offered or conducted by CARB. Members of the public who believe they were unlawfully denied full and equal access to an CARB program or activity may file a civil rights complaint with CARB under this policy. This non-discrimination policy also applies to people or entities, including contractors, subcontractors, or grantees that CARB utilizes to provide benefits and services to members of the public. [. . .]

As described in the Civil Rights Policy and Discrimination Complaint Process, the Civil Rights Officer coordinates implementation of nondiscrimination activities:

CARB's Executive Officer will have final authority and responsibility for compliance with this policy. CARB's Civil Rights Officer, on behalf of the Executive Officer, will coordinate this policy's implementation within CARB, including work with the Ombudsman's Office, Office of Communications, and the staff and managers within a program or activity offered by CARB. The Civil Rights Officer coordinates compliance efforts, receives inquiries concerning non-discrimination requirements, and ensures CARB is complying with state and federal reporting and record retention requirements, including those required by Code of Federal Regulations, title 40, section 7.10 et seq.

¹⁸ CARB. California Air Resources Board and Civil Rights. <https://ww2.arb.ca.gov/california-air-resources-board-and-civil-rights>; Civil Rights Policy and Discrimination Complaint Process. November 1, 2016. <https://ww2.arb.ca.gov/sites/default/files/2023-01/2016-11-03%20CARB%20Civil%20Rights%20Policy%20Revised%20Final.pdf>

The Civil Rights Policy and Discrimination Complaint Process also describes in detail the complaint procedure, as follows:

A Civil rights complaint may be filed against CARB or other people or entities affiliated with CARB, including contractors, subcontractors, or grantees that CARB utilizes to provide benefits and services to members of the public. The complainant must file his or her complaint within one year of the alleged discrimination. This one-year time limit may be extended up to, but no more than, an additional 90 days if the complainant first obtained knowledge of the facts of the alleged violation after the expiration of the one-year time limit. [. . .]

The Civil Rights Officer will review the facts presented and collected and reach a determination on the merits of the complaint based on a preponderance of the evidence. The Civil Rights Officer will inform the complainant in writing when CARB has reached a determination on the merits of the discrimination complaint. Where the complainant has articulated facts that do not appear discriminatory but warrants further review, the Civil Rights Officer, in his or her discretion, may forward the complaint to a party within CARB for action. The Civil Rights Officer will inform the complainant, either verbally or in writing, before facilitating the transfer. [. . .]

CARB will not tolerate retaliation against a complainant or a participant in the complaint process. Anyone who believes that they have been subject to retaliation in violation of this policy may file a complaint of retaliation with CARB following the procedures outlined in this policy.

There is a Civil Rights Complaint Form available¹⁹ on the webpage, which should be used by members of the public to file a complaint of discrimination against CARB that an individual believes occurred during the administration of its programs and services offered to the public. As described on CARB's webpage, for all complaints submitted, the Civil Rights Officer will review the complaint to determine if there is a prima facie complaint (which means, if all facts alleged were true, would a violation of the applicable policy exist). If the Civil Rights Officer identifies a prima facie complaint in the jurisdiction of the Civil Rights Office, the Civil Rights Office will investigate and determine whether there is a violation of the policy.

The laws and regulations that CARB implements through this policy include:

- Code of Federal Regulations, Title 40 Parts 5 and 7;
- Title VI of the U.S. Civil Rights Act of 1964, as amended;

¹⁹ CARB. Civil Rights Complaint Form. July 2019. https://ww2.arb.ca.gov/sites/default/files/2023-01/eo_eeo_033_civil_rights_complaints_form.pdf

- Section 504 of the Rehabilitation Act of 1973;
- Age Discrimination Act of 1975;
- Title IX of the Education Amendments of 1972;
- California Government Code, title 2, Division 3, Part 1, Chapter 2, Article 9.5, *Discrimination*, section 11135 et seq.; and
- California Code of Regulations, title 2, section 10000 et seq.

As part of its overarching civil rights and environmental justice efforts, CARB is in the process of updating its Civil Rights Policy and will make those publicly available once complete. These updates will reflect available U.S. EPA and U.S. Department of Justice resources for Title VI and environmental justice policies. CARB encourages U.S. EPA to issue additional guidance to further clarify Title VI requirements and expectations to assist state implementation efforts.

C. Fiscal Impacts to State Programs

The Measure has some fiscal impacts. Previously exempted vehicles will no longer pay the annual Smog Abatement Fee of \$25, but instead pay the biennial Smog Check inspection certification fee of \$8.25, which is directed to BAR to fund the Smog Check Program. Of the Smog Abatement fee, \$21 is directed to the Air Pollution Control Fund to fund the Moyer Program, which will no longer be collected if the exemption changes. If the Measure is triggered, this will result in fewer funds being directed towards the Air Pollution Control Fund for the Moyer Program, but an increase in certification fees for BAR. For each nonattainment area and standard, CARB staff used the estimated number of vehicles impacted by the change in exemption model year to estimate the fiscal impact of a potential change in exemption if the Measure is triggered. The estimated loss of funding if triggered is detailed for each nonattainment area in Section 5.

The potential loss of funds resulting from the Measure being triggered in an area may result in a loss of funds for the Moyer Program, which could result in fewer Moyer Program projects and fewer opportunities for additional emission reductions. If the Measure is triggered in a nonattainment area, the monetary impacts will be statewide. The Moyer Program funds are collected statewide but allocated to each local air district according to requirements set by H&SC §44299.2. For South Coast Air Basin only, the allocation is based on human population relative to the State as a whole. For the remaining local air districts, funds are allocated based on each local air district's population, air quality, and historical allocation awarded in Fiscal Year (FY) 2002-2003. CARB staff used the statewide average cost effectiveness of Moyer Program projects to estimate the Moyer Program emission reductions impact if the Measure is triggered. Based on CARB staff analysis, the resulting potential foregone emissions reductions from fewer potential projects funded through the Moyer Program will not outweigh the emissions reductions benefit from the Measure. The

estimated loss in potential emissions reductions from the Moyer Program is detailed below in each nonattainment area section of this report. The methodology for calculating the impact of the loss of Moyer Program funds can be found in Appendix C.

D. CEQA

CARB staff has determined that the Measure is exempt from CEQA under the “general rule” or “common sense” exemption (14 CCR 15061(b)(3)). The common sense exemption states a project is exempt from CEQA if “the activity is covered by the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.” The Measure addresses contingency measure requirements under the Act and would remove an exemption from a Smog Check inspection for certain model year vehicles only in the event a Triggering Event occurs. The Measure would only go into effect in the area in which it is triggered. The change in exemptions for vehicles required to obtain a Smog Check inspection, only if triggered by an applicable event, would not require new equipment and has no potential to adversely affect air quality or any other environmental resource area. Based on CARB staff’s review it can be seen with certainty that there is no possibility that the Measure may result in a significant adverse impact on the environment; therefore, this activity is exempt from CEQA.

CARB staff has also determined that the Measure is categorically exempt from CEQA under the “Class 8” exemption (Cal. Code Regs., tit. 14, § 15308). Class 8 exemptions apply to “actions taken by regulatory agencies, as authorized by state or local ordinance, to assure the maintenance, restoration, enhancement, or protection of the environment where the regulatory process involves procedures for protection of the environment.” The proposed Measure is an action by CARB, a regulatory agency, to protect the environment in the event a Triggering Event occurs. The Measure will assure the maintenance and enhancement of the environment by removing exemptions from the Smog Check Program, resulting in additional emissions control equipment failures being identified and corrected, thereby reducing emissions that typically result when emissions control equipment is not performing as designed. CARB staff analysis indicates air emission benefits exceed the disbenefits in each relevant air basin. Therefore, the Smog Check Contingency Measure is also exempt as a Class 8 exemption.

Section 5. Nonattainment Area Analyses

California's nonattainment challenge for ozone and PM2.5 NAAQS in most of the State is driven in part due to motor vehicle emissions. While CARB's regulations require motor vehicles to meet emission standards throughout their useful lives, this is not guaranteed. CARB staff recommends the Board exercise the authority under this statute and find that exempting motor vehicles that are less than 8 years old from the requirements is preventing the State from meeting its commitments under the Act related to complying with the Act's contingency measure requirements. Subjecting vehicles to the Smog Check Program to reduce emissions as a contingency measure when a Triggering Event occurs would help the State meet its contingency measure requirement under the Act. In addition to CARB's actions, each local air district has either included a complementary contingency measure or measures in their SIP or will provide a reasoned justification for why they are unable to provide contingency measures for the full amount of reductions as specified in the draft guidance. Below, for each nonattainment area listed in Table 1, CARB staff is providing the estimate of the one year's worth of progress, estimate of contingency measure reductions, equity impacts, and Moyer Program impacts.

A. Coachella Valley

The Measure complements local air district efforts to meet contingency measure requirements for the 75 ppb and 70 ppb 8-hour ozone standards. The required amount of emission reductions from contingency measures, or one year's worth (OYW) of progress based on the draft guidance, is shown in Table 3.

Table 3. Coachella Valley OYW of Progress
(reductions calculated on summer planning inventory)

| Standard | Attainment Year | NOx (tpd) | ROG (tpd) |
|---------------------|-----------------|-----------|-----------|
| 75 ppb 8-hour Ozone | 2031 | 0.34 | 0.14 |
| 70 ppb 8-hour Ozone | 2037 | 0.17 | 0.10 |

Table 4 documents the emission reductions that occur after the attainment year due to implementation of the Measure if triggered.

Table 4. Coachella Valley Potential Reductions from Measure
(reductions calculated on summer planning inventory)

| Standard | Attainment Year | NOx Benefits (tpd) | ROG Benefits (tpd) |
|---------------------|-----------------|--------------------|--------------------|
| 75 ppb 8-hour Ozone | 2031 | 0.008 | 0.003 |
| 70 ppb 8-hour Ozone | 2037 | 0.008 | 0.003 |

Equity Impacts

Table 5 documents the potential impact of the Measure on DACs as identified in *CalEnviroScreen 4.0* in the Coachella Valley. The proportion of vehicles that are registered in DACs and would be impacted if the Measure is triggered is proportional to the general population of all vehicles registered in DACs overall, about 4 percent. There is not expected to be a disproportionate impact on disadvantaged communities should the measure be triggered.

Table 5. Coachella Valley Vehicle Populations

| All Vehicles | All Vehicles Population | 8MYO Vehicles* (MY 2013) | 8MYO Vehicles* (MY 2013) Population |
|----------------------------|-------------------------|----------------------------|-------------------------------------|
| Total Vehicle Population | 320,375 | Vehicle Population | 14,622 |
| Vehicle Population in DACs | 15,492 | Vehicle Population in DACs | 640 |
| Proportion DAC | 4.84% | Proportion DAC | 4.38% |

*MY 2013 Vehicle populations were used to represent 8MYO vehicles.

Carl Moyer Impacts

Should the Measure be triggered in Coachella Valley, the potential funds lost by year is listed below in Table 6. The loss in funding would have statewide impacts as the funds are collected and redistributed to districts based on the formula H&SC § 44299.2. Based on statewide cost effectiveness and historical allocations to each local air district, the estimated loss in potential emission reduction benefits in Coachella Valley if the Measure is triggered is shown in Table 7.

Table 6. Coachella Valley 8 MYO Smog Abatement Fees

| Standard | Attainment Year | Potential Dollars |
|---------------------|-----------------|-------------------|
| 75 ppb 8-hour Ozone | 2031 | \$ 311,468 |
| 70 ppb 8-hour Ozone | 2037 | \$ 325,868 |

Table 7. Coachella Valley Carl Moyer Program Potential Foregone Emissions Reductions

(reductions calculated on annual planning inventory consistent with Moyer Program cost-effectiveness)

| Standard | Attainment Year | NOx (tpd) |
|---------------------|-----------------|-----------|
| 75 ppb 8-hour Ozone | 2031 | 0.0002 |
| 70 ppb 8-hour Ozone | 2037 | 0.0002 |

B. Eastern Kern County

The Measure complements local air district efforts to meet contingency measure requirements for the 75 ppb and 70 ppb 8-hour ozone standards. The required amount of emission reductions from contingency measures, or OYW of progress based on the draft guidance, is shown in Table 8.

Table 8. Eastern Kern County OYW of Progress

(reductions calculated on summer planning inventory)

| Standard | Attainment Year | NOx (tpd) | ROG (tpd) |
|---------------------|-----------------|-----------|-----------|
| 75 ppb 8-hour Ozone | 2026 | 0.30 | 0.08 |
| 70 ppb 8-hour Ozone | 2032 | 0.26 | 0.07 |

Table 9 documents the emission reductions that would occur after the attainment year due to implementation of the Measure if triggered.

Table 9. Eastern Kern County Potential Reductions from Measure
(reductions calculated on summer planning inventory)

| Standard | Attainment Year | NOx Benefits (tpd) | ROG Benefits (tpd) |
|---------------------|-----------------|--------------------|--------------------|
| 75 ppb 8-hour Ozone | 2026 | 0.003 | 0.001 |
| 70 ppb 8-hour Ozone | 2032 | 0.003 | 0.001 |

Equity Impacts

Table 10 documents the potential impact of the Measure on DACs as identified in *CalEnviroScreen 4.0* in Eastern Kern County. The proportion of vehicles that are registered in DACs and would be impacted if the Measure is triggered is proportional to the general population of all vehicles registered in DACs overall, about 4 percent. There is not expected to be a disproportionate impact on disadvantaged communities, should the measure be triggered.

Table 10. Eastern Kern County Vehicle Populations
(vehicle populations calculated from EMFAC2021 Fleet Database)

| All Vehicles | All Vehicles Population | 8MYO Vehicles* (MY 2013) | 8MYO Vehicles* (MY 2013) Population |
|----------------------------|-------------------------|----------------------------|-------------------------------------|
| Total Vehicle Population | 86,909 | Vehicle Population | 4,209 |
| Vehicle Population in DACs | 3,640 | Vehicle Population in DACs | 174 |
| Proportion DAC | 4.19% | Proportion DAC | 4.12% |

*MY 2013 Vehicle populations were used to represent 8MYO vehicles.

Carl Moyer Impacts

Should the Measure be triggered in Eastern Kern County, the potential funds lost statewide by year is listed below in Table 11. Based on statewide cost effectiveness and historical allocations to each local air district, the loss in potential emission reduction benefits in Eastern Kern County if the Measure is triggered is shown in Table 12.

Table 11. Eastern Kern County 8 MYO Smog Abatement Fees

| Standard | Attainment Year | Potential Dollars |
|---------------------|-----------------|-------------------|
| 75 ppb 8-hour Ozone | 2026 | \$ 112,514 |
| 70 ppb 8-hour Ozone | 2032 | \$ 116,670 |

Table 12. Eastern Kern Carl Moyer Program Potential Foregone Emissions Reductions
(reductions calculated on annual planning inventory consistent with Moyer Program cost-effectiveness)

| Standard | Attainment Year | NOx (tpd) |
|---------------------|-----------------|-----------|
| 75 ppb 8-hour Ozone | 2026 | 0.000003 |
| 70 ppb 8-hour Ozone | 2032 | 0.000003 |

C. Mariposa County

The Measure complements local air district efforts to meet contingency measure requirements for the 70 ppb 8-hour ozone standard. The required amount of emission reductions from contingency measures, or OYW of progress based on the draft guidance, is shown in Table 13.

Table 13. Mariposa County OYW of Progress
(reductions calculated on summer planning inventory)

| Standard | Attainment Year | NOx (tpd) | ROG (tpd) |
|---------------------|-----------------|-----------|-----------|
| 70 ppb 8-hour Ozone | 2026 | 0.02 | 0.13 |

Table 14 documents the emission reductions that would occur after the attainment year due to implementation of the Measure if triggered.

Table 14. Mariposa County Potential Reductions from Measure
(reductions calculated on summer planning inventory)

| Standard | Attainment Year | NOx Benefits (tpd) | ROG Benefits (tpd) |
|---------------------|-----------------|--------------------|--------------------|
| 70 ppb 8-hour Ozone | 2026 | 0.0003 | 0.0001 |

Equity Impacts

Per scores in *CalEnviroScreen 4.0*, there are very few vehicles registered in DACs in Mariposa County. There is not expected to be a disproportionate impact on disadvantaged communities should the measure be triggered.

Carl Moyer Impacts

Should the Measure be triggered in Mariposa County, the potential funds lost by year is listed below in Table 15. Based on district allocations of Moyer Program funds per H&SC §44299.2, Mariposa County receives \$200,000 regardless of the funding available statewide. Thus, there will be no emissions disbenefit from a decrease in Moyer Funds in Mariposa County if the measure is triggered, shown in Table 16.

Table 15. Mariposa County 8 MYO Smog Abatement Fees

| Standard | Attainment Year | Potential Dollars |
|---------------------|-----------------|-------------------|
| 70 ppb 8-hour Ozone | 2026 | \$ 8,691 |

Table 16. Mariposa County Carl Moyer Program Potential Foregone Emissions Reductions

(reductions calculated on annual planning inventory consistent with Moyer Program cost-effectiveness)

| Standard | Attainment Year | NOx (tpd) |
|---------------------|-----------------|-----------|
| 70 ppb 8-hour Ozone | 2026 | 0.000 |

D. Sacramento Metro Area

The Measure complements the local air districts' efforts to meet contingency measure requirements for the 75 ppb and 70 ppb 8-hour ozone standards. The required amount of emission reductions from contingency measures, or OYW of progress based on the draft guidance, is shown in Table 17.

Table 17. Sacramento Metro OYW of Progress

(reductions calculated on summer planning inventory)

| Standard | Attainment Year | NOx (tpd) | ROG (tpd) |
|---------------------|-----------------|-----------|-----------|
| 75 ppb 8-hour Ozone | 2024 | 2.20 | 1.78 |
| 70 ppb 8-hour Ozone | 2032 | 1.26 | 0.99 |

Table 18 documents the emission reductions that occur after the attainment year due to implementation of the Measure if triggered.

Table 18. Sacramento Metro Area Potential Reductions from Measure
(reductions calculated on summer planning inventory)

| Standard | Attainment Year | NOx Benefits (tpd) | ROG Benefits (tpd) |
|---------------------|-----------------|--------------------|--------------------|
| 75 ppb 8-hour Ozone | 2024 | 0.077 | 0.037 |
| 70 ppb 8-hour Ozone | 2032 | 0.047 | 0.015 |

Equity Impacts

Table 19 documents the potential impact of the Measure on DACs as identified in *CalEnviroScreen 4.0* in the Sacramento Metro area. The proportion of vehicles that are registered in DACs and would be impacted if the Measure is triggered is proportional to the general population of all vehicles registered in DACs overall, about 7 percent. There is not expected to be a disproportionate impact on disadvantaged communities should the measure be triggered.

Table 19 Sacramento Metro Area Vehicle Populations
(vehicle populations calculated from EMFAC2021 Fleet Database)

| All Vehicles | 8 MYO Vehicles (MY 2013) | | |
|----------------------------|--------------------------|---------------------------------|--------|
| Total Vehicle Population | 1,766,464 | MY13 Vehicle Population | 88,163 |
| Vehicle Population in DACs | 135,377 | MY13 Vehicle Population in DACs | 6,387 |
| Proportion DAC | 7.66% | Proportion DAC | 7.24% |

Carl Moyer Impacts

Should the Measure be triggered in the Sacramento Metro Area, the potential funds lost by year is listed below in Table 20. Based on statewide cost effectiveness and historical allocations to each local air district, the loss in potential emission reduction benefits in Sacramento Metro Area if the Measure is triggered is shown in Table 21.

Table 20. Sacramento Metro Area 8 MYO Smog Abatement Fees

| Standard | Attainment Year | Potential Dollars |
|---------------------|-----------------|-------------------|
| 75 ppb 8-hour Ozone | 2024 | \$ 2,554,206 |
| 70 ppb 8-hour Ozone | 2032 | \$ 2,020,844 |

Table 21. Sacramento Metro Area Carl Moyer Program Potential Foregone Emissions Reductions

(reductions calculated on annual planning inventory consistent with Moyer Program cost-effectiveness)

| Standard | Attainment Year | NO _x (tpd) |
|---------------------|-----------------|-----------------------|
| 75 ppb 8-hour Ozone | 2024 | 0.0009 |
| 70 ppb 8-hour Ozone | 2032 | 0.0007 |

E. San Diego County

The Measure complements local air district efforts to meet contingency measure requirements for the 75 ppb and 70 ppb 8-hour ozone standards. The required amount of emission reductions from contingency measures, or OYW of progress based on the draft guidance, is shown in Table 22.

Table 22. San Diego County OYW of Progress

(reductions calculated on summer planning inventory)

| Standard | Attainment Year | NO _x (tpd) | ROG (tpd) |
|---------------------|-----------------|-----------------------|-----------|
| 75 ppb 8-hour Ozone | 2026 | 2.19 | 1.97 |
| 70 ppb 8-hour Ozone | 2032 | 1.26 | 0.89 |

Table 23 documents the emission reductions that occur after the attainment year due to implementation of the Measure if triggered.

Table 23. San Diego County Potential Reductions from Measure
(reductions calculated on summer planning inventory)

| Standard | Attainment Year | NOx Benefits (tpd) | ROG Benefits (tpd) |
|---------------------|-----------------|--------------------|--------------------|
| 75 ppb 8-hour Ozone | 2026 | 0.065 | 0.027 |
| 70 ppb 8-hour Ozone | 2032 | 0.056 | 0.016 |

Equity Impacts

Table 24 documents the potential impact of the Measure on DACs as identified in *CalEnviroScreen 4.0* in San Diego County. The proportion of vehicles that are registered in DACs and would be impacted if the Measure is triggered is proportional to the general population of all vehicles registered in DACs overall, about 5.5 percent. There is not expected to be a disproportionate impact on disadvantaged communities, should the measure be triggered.

Table 24. San Diego County Vehicle Populations
(vehicle populations calculated from EMFAC2021 Fleet Database)

| All Vehicles | 8 MYO Vehicles (MY 2013) | | |
|----------------------------|--------------------------|---------------------------------|---------|
| Total Vehicle Population | 2,360,242 | MY13 Vehicle Population | 117,373 |
| Vehicle Population in DACs | 146,252 | MY13 Vehicle Population in DACs | 6,433 |
| Proportion DAC | 6.20% | Proportion DAC | 5.48% |

Carl Moyer Impacts

Should the Measure be triggered in San Diego County, the potential funds lost by year is listed below in Table 25. Based on statewide cost effectiveness and historical allocations to each local air district, the loss in potential emission reduction benefits in San Diego County if the Measure is triggered is shown in Table 26.

Table 25. San Diego County 8 MYO Smog Abatement Fees

| Standard | Attainment Year | Potential Dollars |
|---------------------|-----------------|-------------------|
| 75 ppb 8-hour Ozone | 2026 | \$ 2,308,061 |
| 70 ppb 8-hour Ozone | 2032 | \$ 2,341,248 |

Table 26. San Diego County Carl Moyer Program Potential Foregone Emissions Reductions

(reductions calculated on annual planning inventory consistent with Moyer Program cost-effectiveness)

| Standard | Attainment Year | NO _x (tpd) |
|---------------------|-----------------|-----------------------|
| 75 ppb 8-hour Ozone | 2026 | 0.001 |
| 70 ppb 8-hour Ozone | 2032 | 0.001 |

F. San Joaquin Valley

The Measure complements district efforts to meet contingency measure requirements for the 80 ppb, 75 ppb and 70 ppb 8-hour ozone standards, the 15 ug/m³ and 12 ug/m³ annual PM_{2.5} standards, and the 35 ug/m³ 24-hour PM_{2.5} standard. On May 18, 2023, specific to PM_{2.5} standards, the San Joaquin Valley Air Pollution Control District adopted their *PM_{2.5} Contingency Measure SIP Revision* which was submitted to U.S. EPA by CARB staff. Further, on June 23, 2023, CARB staff committed to submit to U.S. EPA a triggered contingency measure under State authority for the PM_{2.5} standards. If adopted, the Measure will be submitted to U.S. EPA to fulfill that commitment.

The required amount of emission reductions from contingency measures, or OYW of progress based on the draft guidance, is shown in Table 27 for the 80 ppb, 75 ppb and 70 ppb 8-hour ozone standards.

Table 27. San Joaquin Valley OYW of Progress

(reductions calculated on summer planning inventory)

| Standard | Attainment Year | NO _x (tpd) | ROG (tpd) |
|---------------------|-----------------|-----------------------|-----------|
| 80 ppb 8-hour ozone | 2023 | 7.57 | 2.40 |
| 75 ppb 8-hour Ozone | 2031 | 4.25 | 1.88 |
| 70 ppb 8-hour Ozone | 2037 | 2.35 | 1.73 |

Table 28 documents the emission reductions that occur after the attainment year due to implementation of the Measure if triggered.

Table 28. San Joaquin Valley Potential Reductions from Measure
 (reductions calculated on summer planning inventory for ozone, annual planning inventory for PM2.5)

| Standard | Attainment Year | NOx Benefits (tpd) | ROG Benefits (tpd) |
|------------------------|-----------------|--------------------|--------------------|
| 80 ppb 8-hour Ozone | 2023 | 0.112 | 0.056 |
| 15 µg/m³ Annual PM2.5 | 2023 | 0.117 | 0.052 |
| 35 µg/m³ 24-hour PM2.5 | 2024 | 0.120 | 0.052 |
| 12 µg/m³ Annual PM2.5 | 2030 | 0.086 | 0.027 |
| 75 ppb 8-hour Ozone | 2031 | 0.079 | 0.025 |
| 70 ppb 8-hour Ozone | 2037 | 0.076 | 0.024 |

Equity Impacts

Table 29 documents the potential impact of the Measure on DACs as identified in *CalEnviroScreen 4.0* in the San Joaquin Valley. The proportion of vehicles that are registered in DACs and would be impacted if the Measure is triggered is proportional to the general population of all vehicles registered in DACs overall, about 28-29 percent, though the percentage of people residing in DACs in San Joaquin Valley is relatively higher compared to other districts. There is not expected to be a disproportionate impact on disadvantaged communities should the measure be triggered.

Table 29. San Joaquin Valley Vehicle Populations
 (vehicle populations calculated from EMFAC2021 Fleet Database)

| All Vehicles | 8 MYO Vehicles (MY 2013) | | |
|----------------------------|--------------------------|---------------------------------|---------|
| Total Vehicle Population | 2,493,831 | MY13 Vehicle Population | 113,744 |
| Vehicle Population in DACs | 738,064 | MY13 Vehicle Population in DACs | 31,906 |
| Proportion DAC | 29.60% | Proportion DAC | 28.05% |

Carl Moyer Impacts

Should the Measure be triggered in San Joaquin Valley, the potential funds lost by year is listed below in Table 30. Based on statewide cost effectiveness and historical allocations to each local air district, the loss in potential emission reduction benefits in the San Joaquin Valley if the Measure is triggered is shown in Table 31.

Table 30. San Joaquin Valley 8 MYO Smog Abatement Fees

| Standard | Attainment Year | Potential Dollars ²⁰ |
|-----------------------------------|-----------------|---------------------------------|
| 80 ppb 8-hour Ozone | 2023 | \$ 3,781,802 |
| 15 µg/m ³ Annual PM2.5 | 2023 | \$ 3,781,802 |
| 35 µg/m ³ Annual PM2.5 | 2024 | \$ 3,880,753 |
| 12 µg/m ³ Annual PM2.5 | 2030 | \$ 3,171,435 |
| 75 ppb 8-hour Ozone | 2031 | \$ 3,167,124 |
| 70 ppb 8-hour Ozone | 2037 | \$ 3,300,289 |

Table 31 San Joaquin Valley Carl Moyer Program Potential Foregone Emissions Reductions

(reductions calculated on annual planning inventory consistent with Moyer Program cost-effectiveness)

| Standard | Attainment Year | NO _x (tpd) |
|-----------------------------------|-----------------|-----------------------|
| 80 ppb 8-hour Ozone | 2023 | 0.004 |
| 15 µg/m ³ Annual PM2.5 | 2023 | 0.004 |
| 35 µg/m ³ Annual PM2.5 | 2024 | 0.004 |
| 12 µg/m ³ Annual PM2.5 | 2030 | 0.003 |
| 75 ppb 8-hour Ozone | 2031 | 0.003 |
| 70 ppb 8-hour Ozone | 2037 | 0.003 |

²⁰ For years with multiple standards/ triggers in the same year, the loss in smog abatement fees would only be triggered once.

G. South Coast Air Basin

The Measure complements local air district efforts to meet contingency measure requirements for the 75 ppb and 70 ppb 8-hour ozone standards, and the 12 ug/m³ annual PM2.5 standard. The required amount of emission reductions from contingency measures, or OYW of progress based on the draft guidance, is shown in Table 32 for the 75 ppb and 70 ppb 8-hour ozone standards.

Table 32. South Coast Air Basin OYW of Progress
(reductions calculated on summer planning inventory)

| Standard | Attainment Year | NOx (tpd) | ROG (tpd) |
|---------------------|-----------------|-----------|-----------|
| 75 ppb 8-hour Ozone | 2031 | 4.12 | 6.38 |
| 70 ppb 8-hour Ozone | 2037 | 2.62 | 3.54 |

Table 33 documents the emission reductions that occur after the attainment or final RFP milestone year due to implementation of the Measure if triggered.

Table 33. South Coast Air Basin Potential Reductions from Measure
(reductions calculated on summer planning inventory for ozone, annual planning inventory for PM2.5)

| Standard | Attainment/RFP Year | NOx Benefits (tpd) | ROG Benefits (tpd) |
|-----------------------------------|---------------------|--------------------|--------------------|
| 75 ppb 8-hour Ozone | 2029 | 0.295 | 0.096 |
| 70 ppb 8-hour Ozone | 2035 | 0.254 | 0.077 |
| 12 µg/m ³ Annual PM2.5 | 2030 | 0.300 | 0.093 |

Equity Impacts

Table 34 documents the potential impact of the Measure on DACs as identified in *CalEnviroScreen 4.0* in the South Coast Air Basin. The proportion of vehicles that are registered in DACs and would be impacted if the Measure is triggered is lower than the proportion of the general population of all vehicles registered in DACs overall, though the percentage of people residing in DACs in the South Coast Air Basin is relatively higher compared to other local air districts. There is not expected to be a disproportionate impact on disadvantaged communities should the measure be triggered.

Table 34. South Coast Vehicle Populations
(vehicle populations calculated from EMFAC2021 Fleet Database)

| All Vehicles | | 8 MYO Vehicles (MY 2013) | |
|----------------------------|------------|---------------------------------|---------|
| Total Vehicle Population | 11,296,609 | MY13 Vehicle Population | 504,562 |
| Vehicle Population in DACs | 3,324,206 | MY13 Vehicle Population in DACs | 129,225 |
| Proportion DAC | 29.43% | Proportion DAC | 25.61% |

Carl Moyer Impacts

Should the measure be triggered in the South Coast Air Basin, the potential funds lost by year is listed below in Table 35. Based on statewide cost effectiveness and historical allocations to each local air district, the loss in potential emission reduction benefits in the South Coast Air Basin if the Measure is triggered is shown in Table 36.

Table 35. South Coast 8 MYO Smog Abatement Fees

| Standard | Attainment/RFP Year | Potential Dollars |
|-----------------------------------|---------------------|-------------------|
| 75 ppb 8-hour Ozone | 2029 | \$ 11,273,782 |
| 70 ppb 8-hour Ozone | 2035 | \$ 11,195,217 |
| 12 µg/m ³ Annual PM2.5 | 2030 | \$ 11,122,871 |

Table 36. South Coast Carl Moyer Program Potential Foregone Emissions Reductions
(reductions calculated on annual planning inventory consistent with Moyer Program cost-effectiveness)

| Standard | Attainment/RFP Year | NO _x (tpd) |
|-----------------------------------|---------------------|-----------------------|
| 75 ppb 8-hour Ozone | 2029 | 0.024 |
| 70 ppb 8-hour Ozone | 2035 | 0.024 |
| 12 µg/m ³ Annual PM2.5 | 2030 | 0.024 |

H. Ventura County

The Measure complements local air district efforts to meet contingency measure requirements for the 70 ppb 8-hour ozone standard. The required amount of emission reductions from contingency measures, or OYW of progress based on the draft guidance, is shown in Table 37.

Table 37. Ventura County OYW of Progress
(reductions calculated on summer planning inventory)

| Standard | Attainment Year | NOx (tpd) | ROG (tpd) |
|---------------------|-----------------|-----------|-----------|
| 70 ppb 8-hour Ozone | 2026 | 0.48 | 0.20 |

Table 38 documents the emission reductions that occur after the attainment year due to implementation of the Measure if triggered.

Table 38. Ventura County Potential Reductions from Measure
(reductions calculated on summer planning inventory)

| Standard | Attainment Year | NOx Benefits (tpd) | ROG Benefits (tpd) |
|---------------------|-----------------|--------------------|--------------------|
| 70 ppb 8-hour Ozone | 2026 | 0.013 | 0.005 |

Equity Impacts

Table 39 documents the potential impact of the Measure on DACs as identified in [CalEnviroScreen 4.0](#) in Ventura County. The proportion of vehicles that are registered in DACs and would be impacted if the Measure is triggered is proportional to the general population of all vehicles registered in DACs overall, about 3 percent. There is not expected to be a disproportionate impact on disadvantaged communities, should the measure be triggered.

Table 39. Ventura County Vehicle Populations
(vehicle populations calculated from EMFAC2021 Fleet Database)

| All Vehicles | | 8 MYO Vehicles (MY 2013) | |
|----------------------------|---------|---------------------------------|--------|
| Total Vehicle Population | 661,147 | MY13 Vehicle Population | 29,970 |
| Vehicle Population in DACs | 22,466 | MY13 Vehicle Population in DACs | 899 |
| Proportion DAC | 3.40% | Proportion DAC | 3.00% |

Carl Moyer Impacts

Should the Measure be triggered in Ventura County, the potential funds lost by year is listed below in Table 40. Based on statewide cost effectiveness and historical allocations to each local air district, the loss in potential emission reduction benefits in Ventura County if the Measure is triggered is shown in Table 41.

Table 40. Ventura County 8 MYO Smog Abatement Fees

| Standard | Attainment Year | Potential Dollars |
|---------------------|-----------------|-------------------|
| 70 ppb 8-hour Ozone | 2026 | \$ 459,328 |

Table 41. Ventura County Carl Moyer Program Potential Foregone Emissions Reductions

(reductions calculated on annual planning inventory consistent with Moyer Program cost-effectiveness)

| Standard | Attainment Year | NOx (tpd) |
|---------------------|-----------------|-----------|
| 70 ppb 8-hour Ozone | 2026 | 0.00008 |

I. West Mojave Desert

The Measure complements local air districts efforts to meet contingency measure requirements for the 75 ppb and 70 ppb 8-hour ozone standards. The required amount of emission reductions from contingency measures, or OYW of progress based on the draft guidance, is shown in Table 42.

Table 42. West Mojave Desert OYW of Progress
(reductions calculated on summer planning inventory)

| Standard | Attainment Year | NOx (tpd) | ROG (tpd) |
|---------------------|-----------------|-----------|-----------|
| 75 ppb 8-hour Ozone | 2026 | 1.50 | 0.39 |
| 70 ppb 8-hour Ozone | 2032 | 1.18 | 0.35 |

Table 43 documents the emission reductions that occur after the attainment year due to implementation of the Measure if triggered.

Table 43. West Mojave Desert Potential Reductions from Measure
(reductions calculated on summer planning inventory)

| Standard | Attainment Year | NOx Benefits (tpd) | ROG Benefits (tpd) |
|---------------------|-----------------|--------------------|--------------------|
| 75 ppb 8-hour Ozone | 2026 | 0.021 | 0.009 |
| 70 ppb 8-hour Ozone | 2032 | 0.018 | 0.006 |

Equity Impacts

Table 44 documents the potential impact of the Measure on DACs as identified in *CalEnviroScreen 4.0* in the West Mojave Desert. The proportion of vehicles that are registered in DACs and would be impacted if the Measure is triggered is proportional to the general population of all vehicles registered in DACs overall, about 8.5 percent. There is not expected to be a disproportionate impact on disadvantaged communities, should the measure be triggered.

Table 44. West Mojave Desert Vehicle Populations
(vehicle populations calculated from EMFAC2021 Fleet Database)

| All Vehicles | 8 MYO Vehicles (MY 2013) | | |
|----------------------------|--------------------------|---------------------------------|--------|
| Total Vehicle Population | 665,512 | MY13 Vehicle Population | 23,721 |
| Vehicle Population in DACs | 56,624 | MY13 Vehicle Population in DACs | 2,047 |
| Proportion DAC | 8.5% | Proportion DAC | 8.6% |

Carl Moyer Impacts

Should the measure be triggered in West Mojave Desert, the potential funds lost by year is listed below in Table 45. Based on statewide cost effectiveness and historical allocations to each local air district, the loss in potential emission reduction benefits in West Mojave Desert if the Measure is triggered is shown in Table 46.

Table 45. West Mojave Desert 8 MYO Smog Abatement Fees

| Standard | Attainment Year | Potential Dollars |
|---------------------|-----------------|-------------------|
| 75 ppb 8-hour Ozone | 2026 | \$ 746,890 |
| 70 ppb 8-hour Ozone | 2032 | \$ 752,076 |

Table 46. West Mojave Desert Carl Moyer Program Potential Foregone Emissions Reductions

(reductions calculated on annual planning inventory consistent with Moyer Program cost-effectiveness)

| Standard | Attainment Year | NOx (tpd) |
|---------------------|-----------------|-----------|
| 75 ppb 8-hour Ozone | 2026 | 0.00006 |
| 70 ppb 8-hour Ozone | 2032 | 0.00006 |

J. Western Nevada County

The Measure complements local air district efforts to meet contingency measure requirements for the 70 ppb 8-hour ozone standard. The required amount of emission reductions from contingency measures, or OYW of progress based on the draft guidance, is shown in Table 47.

Table 47. Western Nevada County OYW of Progress

(reductions calculated on summer planning inventory)

| Standard | Attainment Year | NOx (tpd) | ROG (tpd) |
|---------------------|-----------------|-----------|-----------|
| 70 ppb 8-hour Ozone | 2026 | 0.09 | 0.08 |

Table 48 documents the emission reductions that occur after the attainment year due to implementation of the Measure if triggered.

Table 48. Western Nevada County Potential Reductions from Measure
(reductions calculated on summer planning inventory)

| Standard | Attainment Year | NOx Benefits (tpd) | ROG Benefits (tpd) |
|---------------------|-----------------|--------------------|--------------------|
| 70 ppb 8-hour Ozone | 2026 | 0.002 | 0.001 |

Equity Impacts

Per scores in *CalEnviroScreen 4.0*, there is only one vehicle registered in a DAC within the Western Nevada County nonattainment area. There is not expected to be a disproportionate impact on disadvantaged communities, should the measure be triggered.

Carl Moyer Impacts

Should the Measure be triggered in Western Nevada County, the potential funds lost by year is listed below in Table 49. Based on district allocations of Moyer Program funds per H&SC §44299.2, Northern Sierra Air Quality Management District, the local air district for Western Nevada County, receives \$200,000 regardless of the funding available statewide. Thus, there will be no emissions disbenefit from a decrease in Moyer Funds in Western Nevada County if the measure is triggered, shown in Table 50.

Table 49. Western Nevada County 8 MYO Smog Abatement Fees

| Standard | Attainment Year | Potential Dollars |
|---------------------|-----------------|-------------------|
| 70 ppb 8-hour Ozone | 2026 | \$ 79,262 |

Table 50. Western Nevada County Carl Moyer Program Potential Foregone Emissions Reductions

(reductions calculated on annual planning inventory consistent with Moyer Program cost-effectiveness)

| Standard | Attainment Year | NOx Benefits (tpd) |
|---------------------|-----------------|--------------------|
| 70 ppb 8-hour Ozone | 2026 | 0.000 |

Section 6. Staff Recommendation

CARB staff recommends the Board:

1. Adopt the Measure addressing contingency measure requirements for the applicable nonattainment areas and standards as listed in Table 1;
2. Approve submittal into the California SIP of H&SC sections 44011(a)(4)(A) and (B);
and
3. Direct the Executive Officer to submit the Measure, and H&SC sections 44011(a)(4)(A) and (B), to U.S. EPA as a revision to the California SIP.

Appendix A: Infeasibility Analysis

Infeasibility Analysis

Measure Analysis

CARB staff analyzed CARB's suite of control measures for all sources under CARB authority to identify potential contingency measure options. CARB control measures reduce NO_x, ROG and PM_{2.5} emissions. CARB currently has programs in place or under development for most of these sources and have evaluated a variety of regulatory mechanisms within existing and new programs for potential contingency triggers.

Criteria for Contingency Feasibility

CARB staff has evaluated potential options for a contingency measure within each of CARB's regulations (Table 51) using three criteria to determine its feasibility given the contingency measure requirements under the Act, recent court decisions and draft guidance. First, each measure was evaluated on whether it could be implemented within 30 days of being triggered and achieve the necessary reductions within 1-2 years of being triggered. Second, the technological feasibility of each option was considered to assess whether the measure would be technically feasible to implement. Measure requirements may be unavailable or cost prohibitive to implement, especially in the time frame required for contingency. Lastly, CARB staff evaluated whether the timeline for adoption would be compatible with the current consent decree deadline of September 30, 2024²¹. The contingency measure must be adopted by CARB and submitted to and fully approved by U.S. EPA by this date to resolve a San Joaquin Valley PM_{2.5} Federal Implementation Plan (FIP) published by U.S. EPA on August 7, 2023. A CARB statewide measure needing a full regulatory process typically requires five years for development and adoption by CARB and additional time for U.S. EPA's approval process including obtaining an Act waiver or authorization.

Challenges for CARB Measures

Based on CARB's feasibility analysis, there are a few common components of CARB regulations that limit the options for contingency measures. All new engine and emissions standards set by CARB require waivers or authorizations from federal preemption under the Clean Air Act; this process can take anywhere from months to several years, and then U.S. EPA must also act to approve the regulation into the California SIP. Further, CARB regulations that require fleet turnover or new engine standards require a long lead time for implementation. Engine manufacturers would need lead time to design, plan, certify, manufacture, and deploy cleaner engines to meet a new or accelerated engine standard, while fleet regulations necessitate that manufacturing is mature so that there is enough supply available to meet that demand. On the consumer side, additional time would be required for procurement implementation and there may be additional infrastructure

²¹ See 87 Fed.Reg. 71631 (Nov. 23, 2022).

needed to meet new requirements. Thus, measures that require fleet turnover or new engine standards are not appropriate to be used as a triggered contingency measure.

CARB regulations are also technology-forcing, which makes it difficult to amend regulations or pull compliance timelines forward with only 1-2 years notice as industry needs time to plan, develop, and implement these new technologies. It would be infeasible to require industry to turn over their fleets within one year if the technology is not readily available at a reasonable cost. CARB regulations are also the most stringent air quality control requirements in the country, so there are few opportunities to require additional stringency. CARB is driving sources under our authority to zero-emission everywhere feasible to ensure attainment of air quality standards across the State, and to support near-source toxics reductions and climate targets. However, the zero-emissions targets also eliminates opportunities for contingency.

Lastly, many of CARB’s options for a contingency measure would require a full rulemaking process and would not be adopted by CARB, received an Act waiver/authorization, and approved by U.S. EPA within the timeframe specified, making many of the options infeasible. Based on the U.S. EPA FIP timeline, CARB staff would need to find a measure that could realistically be adopted and approved by U.S. EPA within the next year. However, most CARB measures must go through a regulatory process for adoption that can take approximately five years from start to finish.

Table 51. Assessment of Potential CARB Contingency Measures

| Emission Source | Regulatory Programs | Latest Amendment Requirements | Contingency Options | Trigger Feasibility | Technological Feasibility |
|---|--|--|---|--|--|
| Light-Duty Passenger Vehicles and Light-Duty Trucks | Advanced Clean Cars Program (I and II), including the Zero Emission Vehicle (ZEV) Regulation | Amended 8/25/22 Requires 100% ZEV new vehicle sales by 2035 and increasingly stringent standards for gasoline cars and passenger trucks. | Pulling compliance timelines forward. Setting more stringent standards. | No; standards need years of lead time to be developed, certified, and implemented; infeasible to implement new standard or manufacturing requirements within 60 days and achieve reductions within one year. | No; current standards and requirements are technology forcing and most stringent in the nation, including a zero-emission requirement. Further stringency would not be feasible. |
| | Clean Miles Standard | Adopted 5/20/21 Set eVMT (electric miles traveled) and greenhouse gas (GHG) requirements for Transportation Network Companies (TNCs). | Pulling forward timeline to achieve 100% eVMT. | No; standards and fleet requirements need lead time to be implemented; infeasible to implement new standard or purchasing requirements within 60 days and achieve reductions within one year. | No; zero-emissions technology requirement is most stringent standard; TNCs are only a small portion of on-road vehicles, depending on area, may not achieve many reductions. |

| Emission Source | Regulatory Programs | Latest Amendment Requirements | Contingency Options | Trigger Feasibility | Technological Feasibility |
|------------------------|--------------------------------|---|--|--|--|
| | On Board Diagnostics II (OBD) | Amended July 22, 2021 Required updates to program to address cold start emissions and diesel particulate matter (PM) monitoring. Many of the regulatory changes included phase-ins that are not 100% until 2027. | Removing or pulling phase-in timelines forward. Setting more stringent OBD requirements. | No; OBD requirements need significant lead time to be developed, adopted, and implemented; infeasible to fully implement new requirements within 60 days and achieve similar reductions within one year. | No; the OBD requirements require sufficient lead time to implement with significant development time needed for hardware/ software changes and verification/validation testing. |
| | California Smog Check Program | Amended 2010 via legislation Smog Check Program enhancements, including new technologies and test methods. | Change the exemptions from 8 to 7 and/or 6 model years. Require annual Smog Check. Require annual Smog Check for only high mileage vehicles. | Yes (changing the exemptions) because it is not a regulatory change; No (other options); Smog Check requirements need significant lead time to be developed, adopted, and implemented; infeasible to fully implement new requirements within 60 days and achieve similar reductions within one year. | Yes (changing the exemptions) and would not have disproportionate impacts; Yes (other options), but would disproportionately impact low-income populations and disadvantaged communities. |
| | Reformulated Gasoline | Amended May 2003 Required removal of methyl tert-butyl ether (MTBE) and included refinery limits and cap limits. | Require more stringent standards. Change cap limits and refinery limits. | No; fuel standards need years of lead time to be developed, certified, and implemented; infeasible to implement new standard within 60 days and achieve reductions within one year. | No; current standards and requirements are some of most stringent in the world; not feasible to require further stringency of specifications and develop or manufacture in a compressed timeline. |
| Motorcycles | On-Road Motorcycle Regulation* | Proposed hearing: 2023 May require exhaust emissions standards (harmonize with European standards), evaporative emissions standards, and Zero Emission Motorcycle sales thresholds. | Pulling compliance timelines forward. Require more stringent emissions standards. | No; standards need years of lead time to be developed, certified, and implemented; infeasible to implement new standard within 60 days and achieve reductions within one year. | No; Any increase to the stringency of proposed standards would require an additional 1 to 2 years of lead time for 1) CARB staff to evaluate feasibility, and 2) manufacturers to develop and certify compliant motorcycles. |

| Emission Source | Regulatory Programs | Latest Amendment Requirements | Contingency Options | Trigger Feasibility | Technological Feasibility |
|------------------------|--|--|---|--|--|
| Medium Duty-Trucks | Clean Diesel Fuel | Amended 2013 Established more stringent standards for diesel fuel. | Require more stringent fuel standard. | No; fuel standards need years of lead time to be developed, certified, and implemented; infeasible to implement new standard within 60 days and achieve reductions within one year. | No; infeasible to require more stringent standards in compressed timeline. |
| | Heavy-Duty Engine and Vehicle Omnibus Regulation | Adopted 8/27/20 Established new low NOx and lower PM tailpipe standards and lengthened the useful life and emissions warranty of in-use heavy-duty diesel engines. | Require more stringent standard, make optional idling standard required. Update testing requirements or corrective action procedures. | No; standards need years of lead time to be implemented; infeasible to implement new sales requirement within 60 days and achieve reductions within one year. | No; infeasible to require more stringent standards in compressed timeline. |
| | Advanced Clean Trucks Regulation | Adopted 6/25/20 Established manufacturer zero-emission truck sales requirement and company and fleet reporting. | Move up timeline for ZEV sales requirement. Reduce threshold for compliance. | No; manufacturer sales requirements need years of lead time to be implemented; infeasible to implement new sales requirement within 60 days. Sales requirement would not happen immediately or within one year of trigger; infeasible to achieve reductions within one year. | No; current sales requirement is technology forcing and most stringent in the nation. |
| | Advanced Clean Cars Program (I and II), including the Zero Emission Vehicle Regulation | Amended 8/25/22 Requires 100% ZEV new vehicle sales by 2035 and increasingly stringent standards for gasoline cars and passenger trucks. | Pulling compliance timelines forward. Setting more stringent standards. | No; standards need years of lead time to be developed, certified, and implemented; infeasible to implement new standard or manufacturing requirements within 60 days and achieve reductions within one year. | No; current standards and requirements are technology forcing and most stringent in the nation, including a zero-emission requirement. Further stringency would not be feasible. |

| Emission Source | Regulatory Programs | Latest Amendment Requirements | Contingency Options | Trigger Feasibility | Technological Feasibility |
|------------------------|--|--|---|--|--|
| | Advanced Clean Fleets Regulation | Adopted 4/27/23 Establishes zero-emission purchasing requirements for medium- and heavy-duty vehicle fleets (including state and local agencies, and drayage fleets, high priority, and federal fleets); would also require 100% zero-emission new vehicle sales starting 2040. | Pulling compliance timelines forward. Reduce threshold for compliance. | No; fleet requirements need years of lead time to be implemented; infeasible to implement new purchasing requirements within 60 days. Purchasing requirement and turnover would not happen immediately; infeasible to achieve reductions within one year. Because of near term compliance deadlines, moving forward deadlines would not result in many reductions. | No; current fleet requirements are technology forcing and most stringent in the nation, eventually requiring zero-emissions only. |
| Heavy-Duty Trucks | Heavy-Duty Low NOx Engine Standards | See Omnibus. | More stringent standards were set with Omnibus Regulation. | No; engine standards need years of lead time to be developed, certified, and implemented; infeasible to implement new standard or purchasing requirements within 60 days and achieve reductions within one year. | No; infeasible to require more stringent technology forcing standards in compressed timeline if technology/ alternatives are not widely available. |
| | Optional Low-NOx Standards for Heavy-Duty Diesel Engines | Amended 8/27/20 as a part of Omnibus to lower the optional low NOx emission standards for on-road heavy-duty engines. | Make option required. | No; engine standards need years of lead time to be developed, certified, and implemented; infeasible to implement new standard or purchasing requirements within 60 days and achieve reductions within one year. | No; infeasible to require more stringent technology forcing standards in compressed timeline if technology/ alternatives are not widely available. |
| | Heavy-Duty Inspection and Maintenance Regulation | Adopted 12/9/21 Requires periodic vehicle emissions testing and reporting on nearly all heavy-duty vehicles operating in California. | Increase frequency of testing. | No; increased I/M requirements need significant lead time to be developed, adopted, and implemented; infeasible to fully implement new requirements within 60 days and achieve similar reductions within one year. | Yes, but costs would disproportionately impact small businesses and low-income populations. |

| Emission Source | Regulatory Programs | Latest Amendment Requirements | Contingency Options | Trigger Feasibility | Technological Feasibility |
|------------------------|---|---|--|--|---|
| | Heavy-Duty OBD | Amended July 22, 2021 Required updates to program to address cold start emissions and diesel PM monitoring. Many of the regulatory changes included phase-ins that are not 100% until 2027. | Removing or pulling phase-in timelines forward. Setting more stringent OBD requirements. | No; OBD requirements need significant lead time to be developed, adopted, and implemented; infeasible to fully implement new requirements within 60 days and achieve similar reductions within one year. | No; the OBD requirements require sufficient lead time to implement with significant development time needed for hardware/ software changes and verification/validation testing. |
| | Heavy-Duty Engine and Vehicle Omnibus Regulation | Adopted 8/27/20 Established new low NOx and lower PM Standards and lengthened the useful life and emissions warranty of in-use heavy-duty diesel engines. | Require more stringent standard, make optional idling standard required. Update testing requirements or corrective action procedures. | No; standards need years of lead time to be developed, certified, and implemented; infeasible to implement new standard or sales requirements within 60 days and achieve reductions within one year. | No; infeasible to require more stringent technology forcing standards in compressed timeline. |
| | Cleaner In-Use Heavy-Duty Trucks (Truck and Bus Regulation) | Adopted 12/17/10 Requires heavy-duty diesel vehicles that operate in California to reduce exhaust emissions. By January 1, 2023, nearly all trucks and buses will be required to have 2010 or newer model year engines to reduce PM and NOx. | None | - | - |
| | Zero-Emission Powertrain Certification Regulation | Adopted 12/6/19 Establishes certification requirements for zero-emission powertrains. | None | - | - |

| Emission Source | Regulatory Programs | Latest Amendment Requirements | Contingency Options | Trigger Feasibility | Technological Feasibility |
|------------------------|----------------------------------|--|---|--|---|
| | Advanced Clean Trucks Regulation | Adopted 6/25/20 Established manufacturer zero-emission truck sales requirement and company and fleet reporting. | Move up timeline for ZEV sales requirement. Reduce threshold for compliance. | No; manufacturer sales requirements need years of lead time to be implemented; infeasible to implement new sales requirement within 60 days. Sales requirement would not happen immediately or within one year of trigger; infeasible to achieve reductions within one year. | No; current sales requirement is technology forcing and most stringent in the nation. |
| | Advanced Clean Fleets Regulation | Adopted 4/27/23 Establishes zero-emission purchasing requirements for medium- and heavy-duty vehicle fleets (including state and local agencies, and drayage fleets, high priority, and federal fleets); would also require 100% zero-emission new vehicle sales starting 2040. | Pulling compliance timelines forward. Reduce threshold for compliance. | No; fleet requirements need years of lead time to be implemented; infeasible to implement new purchasing requirements within 60 days. Purchasing requirement and turnover would not happen immediately; infeasible to achieve reductions within one year. Because of near term compliance deadlines, moving forward deadlines would not result in many reductions. | No; current fleet requirements are technology forcing and most stringent in the nation, eventually requiring zero-emissions only. |
| Heavy-Duty Urban Buses | Innovative Clean Transit | Adopted 12/14/2018 Requires all public transit agencies to gradually transition to a 100% zero-emission bus fleet. | Move compliance timelines forward. Remove various exemptions or compliance options. | No; fleet requirements need years of lead time to be implemented; infeasible to implement new purchasing requirements within 60 days. Purchasing requirement and turnover would not happen immediately; infeasible to achieve reductions within one year. | No; current requirements are technology forcing and most stringent (zero-emission requirement). Further stringency is not possible; expediting timelines would not be feasible. |

| Emission Source | Regulatory Programs | Latest Amendment Requirements | Contingency Options | Trigger Feasibility | Technological Feasibility |
|--|--|--|--|--|---|
| | Advanced Clean Fleets Regulation | Adopted 4/27/23 Establishes zero-emission purchasing requirements for medium- and heavy-duty vehicle fleets (including state and local agencies, and drayage fleets, high priority, and federal fleets); would also require 100% zero-emission new vehicle sales starting 2040. | Pulling compliance timelines forward. Reduce threshold for compliance. | No; fleet requirements need years of lead time to be implemented; infeasible to implement new purchasing requirements within 60 days. Purchasing requirement and turnover would not happen immediately; infeasible to achieve reductions within one year. Because of near term compliance deadlines, moving forward deadlines would not result in many reductions. | No; current fleet requirements are technology forcing and most stringent in the nation, eventually requiring zero-emissions only. |
| Other Buses, Other Buses - Motor Coach | Zero-Emission Airport Shuttle Regulation | Adopted 6/27/19 Requires airport shuttles to transition to zero-emission fleet. | Pull compliance timelines forward. Remove reserve airport shuttle exemption. | No; fleet requirements need years of lead time to be implemented; infeasible to implement new purchasing requirements within 60 days. Purchasing requirement and turnover would not happen immediately; infeasible to achieve reductions within one year. | No; current requirements are technology forcing and most stringent (zero-emission requirement). Further stringency is not possible. Not many shuttles in area, would not achieve many reductions. |
| | Advanced Clean Fleets Regulation | Adopted 4/27/23 Establishes zero-emission purchasing requirements for medium- and heavy-duty vehicle fleets (including state and local agencies, and drayage fleets, high priority, and federal fleets); would also require 100% zero-emission new vehicle sales starting 2040. | Pulling compliance timelines forward. Reduce threshold for compliance. | No; fleet requirements need years of lead time to be implemented; infeasible to implement new purchasing requirements within 60 days. Purchasing requirement and turnover would not happen immediately; infeasible to achieve reductions within one year. Because of near term compliance deadlines, moving forward deadlines would not result in many reductions. | No; current fleet requirements are technology forcing and most stringent in the nation, eventually requiring zero-emissions only. |

| Emission Source | Regulatory Programs | Latest Amendment Requirements | Contingency Options | Trigger Feasibility | Technological Feasibility |
|-------------------------------|--|--|--|--|--|
| Commercial Harbor Craft | Commercial Harbor Craft (CHC) Regulation | Amended 3/24/22 Established more stringent standards, all CHC required to use renewable diesel, expanded requirements, and mandates zero-emission and advanced technologies. | Set more stringent standards. Pull compliance timelines forward. | No; Technology requirements and standards need years of lead time to be developed, certified, and implemented; infeasible to implement new standard or requirements within 60 days and achieve reductions within one year. | No; standards set are technology forcing and most stringent; not technologically feasible to require increased stringency in compressed timeline. |
| Recreational Boats | Spark-Ignition Marine Engine Standards* | Proposed hearing: 2029 Would establish catalyst-based emission standards and percentage of zero-emission technologies for certain applications. | Set more stringent standard. | No; standards need years of lead time to be developed, certified, and implemented; infeasible to implement new standard within 60 days and achieve reductions within one year. | No; standards being set will be most stringent feasible, including zero-emission requirement); would not save a more stringent standard for contingency |
| Transport Refrigeration Units | Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRUs) (Parts I and II*) | Amended 2/24/22 (Part I), Part II proposed CARB hearing in 2025 Requires diesel-powered truck TRUs to transition to zero-emission, PM emission standard for newly manufactured non-truck TRUs. Part II would establish zero-emission options for non-truck TRUs. | Set more stringent standards. Pull compliance timelines forward | No; standards and fleet requirements need years of lead time to be implemented; infeasible to implement new standard or purchasing requirements within 60 days and achieve reductions within one year. | No; current requirements are technology forcing and most stringent (zero-emission requirement). Further stringency is not possible; expediting timelines would not be feasible; would not save a more stringent standard for contingency |
| Industrial Equipment | Large Spark-Ignition (LSI) Engine Fleet Requirements Regulation | Amended July 2016 Extended recordkeeping requirements, established labeling, initial reporting, and annual reporting requirements. | Set more stringent performance standards | No; standards and fleet requirements need years of lead time to be implemented; infeasible to implement new standard or purchasing requirements within 60 days and achieve reductions within one year. | No; Infeasible to require further stringency within one year given timeline for technology development and certification. See Zero-Emission Forklifts below. |

| Emission Source | Regulatory Programs | Latest Amendment Requirements | Contingency Options | Trigger Feasibility | Technological Feasibility |
|-------------------------|--|--|---|---|---|
| | Off-Road Regulation | Amended 11/17/22 Requires phase out of oldest and highest-emitting engines, restricts addition of Tier 3 and 4i engines, mandates renewable diesel for all fleets. | Pull phase-out or compliance timelines forward | No; fleet requirements need years of lead time to be implemented; infeasible to implement new purchasing and turnover requirements within 60 days and achieve reductions within one year. | No; Infeasible to require further stringency within one year given timeline for technology development and certification. |
| | Zero-Emission Forklifts* | Proposed CARB hearing in 2023. Would require model-year phase-out and reporting requirements and manufacturer sales restrictions. | Pull phase-out or compliance timelines forward | No; standards requirements need years of lead time to be developed, certified, and implemented; infeasible to implement new standard within 60 days and achieve reductions within one year. | No; standards being set will be technology forcing and most stringent feasible, including zero-emission requirement; would not save a more stringent standard for contingency |
| | Off-Road Zero-Emission Targeted Manufacturer Rule* | Proposed CARB hearing in 2027. Would require manufacturers of off-road equipment and/or engines to produce for sale zero-emission equipment and/or powertrains as a percentage of their annual statewide sales volume. | Pull forward compliance timelines or increase percentage sales requirements | No; Manufacturing and sales requirements need years of lead time to be implemented; infeasible to pull forward standards within 60 days and achieve reductions within one year. | No; standards being set will be technology forcing and most stringent feasible, including zero-emission requirement; would not save a more stringent standard for contingency |
| Construction and Mining | Off-Road Zero-Emission Targeted Manufacturer Rule* | Proposed CARB hearing in 2027. Would require manufacturers of off-road equipment and/or engines to produce for sale zero-emission equipment and/or powertrains as a percentage of their annual statewide sales volume. | Pull forward compliance timelines or increase percentage sales requirements | No; Manufacturing and sales requirements need years of lead time to be implemented; infeasible to pull forward standards within 60 days and achieve reductions within one year. | No; standards being set will be technology forcing and most stringent feasible, including zero-emission requirement; would not save a more stringent standard for contingency |

| Emission Source | Regulatory Programs | Latest Amendment Requirements | Contingency Options | Trigger Feasibility | Technological Feasibility |
|----------------------------------|---|---|--|--|---|
| | Off-Road Regulation | Amended 11/17/22 Requires phase out of oldest and highest-emitting engines, restricts addition of Tier 3 and 4i engines, mandates renewable diesel for all fleets. | Pull phase-out or compliance timelines forward | No; fleet requirements need years of lead time to be implemented; infeasible to implement new purchasing and turnover requirements within 60 days and achieve reductions within one year. | No; Infeasible to require further stringency within one year given timeline for technology development and certification. |
| Airport Ground Support Equipment | Zero-Emission Forklifts* | Proposed CARB hearing in 2023. Would require model-year phase-out and reporting requirements and manufacturer sales restrictions. | Pull phase-out or compliance timelines forward | No; standards requirements need years of lead time to be developed, certified, and implemented; infeasible to implement new standard within 60 days and achieve reductions within one year. | No; standards being set will be technology forcing and most stringent feasible, including zero-emission requirement; would not save a more stringent standard for contingency |
| | Large Spark-Ignition (LSI) Engine Fleet Requirements Regulation | Amended July 2016 Extended recordkeeping requirements, established labeling, initial reporting, and annual reporting requirements. | Set more stringent performance standards | No; standards and fleet requirements need years of lead time to be implemented; infeasible to implement new standard or purchasing requirements within 60 days and achieve reductions within one year. | No; Infeasible to require further stringency within one year given timeline for technology development and certification. |
| | Off-Road Regulation | Amended 11/17/22. Requires phase out of oldest and highest-emitting engines, restricts addition of Tier 3 and 4i engines, mandates renewable diesel for all fleets. | Pull phase-out or compliance timelines forward | No; fleet requirements need years of lead time to be implemented; infeasible to implement new purchasing and turnover requirements within 60 days and achieve reductions within one year. | No; Infeasible to require further stringency within one year given timeline for technology development and certification. |

| Emission Source | Regulatory Programs | Latest Amendment Requirements | Contingency Options | Trigger Feasibility | Technological Feasibility |
|-------------------------------------|--|--|---|--|---|
| Port Operations and Rail Operations | Cargo Handling Equipment Regulation* | Proposed CARB hearing in 2025. Amendments to transition to zero-emission technology. | None | No; Standards requirements need years of lead time to be developed, certified, and implemented; infeasible to implement new standard within 60 days and achieve reductions within one year. Fully implemented in 2017 and relies on other engine standards, making it infeasible to trigger without regulatory process changing other standards. | No; Considering regulation to move towards zero-emissions. Currently assessing availability of technologies. |
| | Off-Road Zero-Emission Targeted Manufacturer Rule* | Proposed CARB hearing in 2027. Would require manufacturers of off-road equipment and/or engines to produce for sale zero-emission equipment and/or powertrains as a percentage of their annual statewide sales volume. | Pull forward compliance timelines or increase percentage sales requirements | No; Manufacturing and sales requirements need years of lead time to be implemented; infeasible to pull forward standards within 60 days and achieve reductions within one year. | No; standards being set will be technology forcing and most stringent feasible, including zero-emission requirement; would not save a more stringent standard for contingency |
| Lawn and Garden | Small Off-Road Engine (SORE) Regulation | Amended 12/9/21 Requires most newly manufactured SORE to meet emission standards of zero starting in model year (MY) 2024. | Move up implementation on deadlines | No; Standards requirements need years of lead time to be implemented; infeasible to pull forward standards within 60 days. Purchasing would not happen immediately or within one year of trigger; infeasible to achieve reductions within one year. | No; current standards and requirements are a technology forcing zero-emission certification requirement. Further stringency would not be possible. |

| Emission Source | Regulatory Programs | Latest Amendment Requirements | Contingency Options | Trigger Feasibility | Technological Feasibility |
|------------------------|------------------------------------|---|---|---|--|
| Ocean-Going Vessels | At Berth Regulation | Amended 8/27/20 Expands requirements to roll-on roll-off vessels and tankers, smaller fleets, and new ports and terminals. | Remove option to use alternate control technology or set more stringent alternate control technology requirements. Reduce threshold for 'low activity terminals' exemption. | No; control technology requirements need years of lead time to be implemented; infeasible to pull forward standards within 60 days and achieve reductions within one year. | No; regulation already requires use of shore power or alternate control technology for every visit. |
| | Ocean-going Vessel Fuel Regulation | Amended 2011 Extended clean fuel zone and included exemption window. | Set more stringent requirements | No; fleet requirements need years of lead time to be implemented; infeasible to implement new purchasing and turnover requirements within 60 days and achieve reductions within one year. | No; not feasible to require further stringency in a compressed timeline. |
| Locomotives | In-Use Locomotive Regulation | Adopted 4/27/23, Requires each operator to deposit funds into spending account for purchasing cleaner locomotive technology, sets idling limits, and requires registration and reporting. Starting in 2030, only locomotives less than 23 years old can operate in the state. Newly built passenger, switch, and industrial locomotives must operate in a zero emission configuration, and in 2035 newly built freight line haul locomotives. | Move up implementation deadlines. Set stricter idling requirements. | No; Fleet requirements need years of lead time to be implemented; infeasible to pull forward standards within 60 days and reductions within one year. No, for idling requirements. | No; current standards and requirements are technology forcing, include a zero-emission requirement. Further stringency would not be possible. No, for idling requirements, CARB is committing to re-evaluate the requirement during next assessment. |

| Emission Source | Regulatory Programs | Latest Amendment Requirements | Contingency Options | Trigger Feasibility | Technological Feasibility |
|------------------------|--|---|--|---|--|
| Areawide Sources | Zero-Emission Standard for Space and Water Heaters | Proposed CARB hearing in 2025. Beginning in 2030, 100% of sales of new space heaters and water heaters would need to meet a zero-emission standard. | Set trigger for more stringent standards or timelines. | No; Standards requirements need years of lead time to be implemented; infeasible to pull forward standards within 60 days. Purchasing would not happen immediately or within one year of trigger; infeasible to achieve reductions within one year. | No; current standards and requirements are a technology forcing zero-emission certification requirement. Further stringency would not be possible. |

There were few options identified for a contingency measure based on the infeasibility analysis. As previously stated, there are limitations to utilizing CARB regulations for contingency measures and CARB currently has programs in place or under development for most of these sources to reduce NO_x, ROG and PM_{2.5} emissions. However, the analysis did result in identifying the ability to utilize provisions within the Smog Check Program for a viable contingency measure, which is now being proposed.

**Appendix B:
Smog Check Contingency Measure Emissions Benefits
Methodology**

Smog Check Contingency Measure Emissions Benefits

Table 52. List of Non-Attainment Areas and Attainment Years

| Standard | Area | Attainment Year |
|---------------------|------------------|-----------------|
| 80 ppb 8-hour Ozone | San Joaquin | 2023 |
| 75 ppb 8-hour Ozone | Sac Metro | 2024 |
| | Eastern Kern | 2026 |
| | West Mojave | 2026 |
| | San Diego | 2026 |
| | South Coast | 2029 |
| | Coachella Valley | 2031 |
| | SJV | 2031 |
| 70 ppb 8-hour Ozone | Ventura | 2026 |
| | Western Nevada | 2026 |
| | Mariposa | 2026 |
| | Eastern Kern | 2032 |
| | Sacramento Metro | 2032 |
| | San Diego | 2032 |
| | West Mojave | 2032 |
| | South Coast | 2035 |
| | Coachella | 2037 |
| | SJV | 2037 |
| 15 ug PM2.5 | San Joaquin | 2023 |
| 35 ug PM2.5 | San Joaquin | 2024 |
| 12 ug PM2.5 | San Joaquin | 2030 |
| | South Coast | 2030 |

Review Of Current Information

The Emission FACtor (EMFAC) model is California’s official emissions inventory model for on-road mobile sources. EMFAC2021 is the latest U.S. Environmental Protection Agency (U.S. EPA) approved version for use in California for State Implementation Plan (SIP) development and transportation conformity analysis²², and reflects the most recent emission and activity updates and newly adopted regulations at the time of its release. At the present time, almost the entire California vehicle fleet is subjected to the Smog Check Program and hence, in-use testing programs that inform emission rates in EMFAC2021 implicitly incorporate the emissions benefits of California’s Smog Check Program in the model output. In addition, EMFAC2021 does not have functionality to output emissions from the light-duty

²² <https://www.govinfo.gov/content/pkg/FR-2022-11-15/pdf/2022-24790.pdf>

fleet without the effects of Smog Check Program. However, an earlier version of the model, EMFAC2011, used a different modeling framework that allows users to estimate emissions impacts of the Smog Check based on user-defined program requirements specific to each NAA.²³

Unlike the latest version of the model, EMFAC2011 baseline outputs reflect emissions from a fleet without an I/M Program. Because California's Smog Check Program began in 1984, emissions data without an I/M program in EMFAC2011 were derived from U.S. EPA data collected on approximately 7,000 vehicles in Hammond, Illinois and Ann Arbor, Michigan in the 1990s before an I/M program was in effect.²⁴ CARB staff used these data for several versions of the model, up through EMFAC2011, to inform emission rates by vehicle technology group for a theoretical California fleet without an I/M program. Using data from CARB's longstanding Light-Duty Vehicle Surveillance Program (VSP), where vehicles failing the California Smog Check Program were tested before and after repairs, CARB staff adjusted baseline emission rates to reflect the benefits of having an I/M program based on requirements for each region in the State.

Approach

Since the Measure would change the current 8 model-year exemption to 7 model-years, CARB staff applied emission benefits of the change to the calendar year when vehicles would become 8 model-years old. Using this approach, all vehicles, regardless of when annual registration is due and the initial I/M Program inspections were performed during the year the vehicles turned 7 model-years old, will reflect the impacts of being initially subject to the I/M Program requirements for a full calendar year.

CARB staff used EMFAC2011 to derive the emissions impact of an I/M Program for each pollutant and vintage of vehicle newly becoming 8 model-years old in the attainment years listed in Table 52. The emissions impact is reflected as a ratio of emissions with no I/M Program relative to a baseline with an I/M program. As a fraction, this would be: (no-I/M) / (I/M), where ratios greater than one reflect the degree of emissions benefits of having an I/M program in place. CARB staff applied the ratios calculated using EMFAC2011 to the output from EMFAC2021²⁵ because the newest model represents the current California fleetwide emissions reflecting the current model year distribution, populations, accrual rates (miles driven per year), and emissions rates. The details of EMFAC2011 setup and run are provided in in the next section.

CARB staff applied the following equation:

²³ <https://www.federalregister.gov/documents/2013/03/06/2013-05245/official-release-of-emfac2011-motor-vehicle-emission-factor-model-for-use-in-the-state-of-california>

²⁴ <https://ww2.arb.ca.gov/sites/default/files/2023-03/emfac2000-ef.pdf>

²⁵ Downloaded from EMFAC2021 web database: <https://arb.ca.gov/emfac/emissions-inventory>

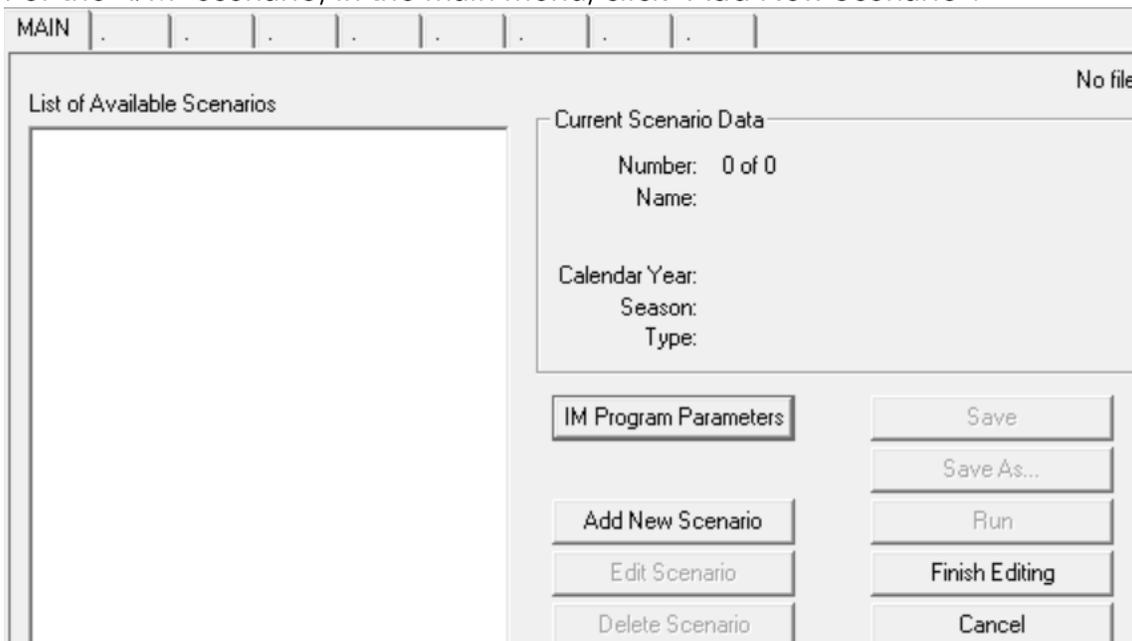
Benefits of removing 8-year exemption = Age 8 No-I/M emissions - Age 8 I/M emissions = (EMFAC2021 Age 8 Gasoline Vehicle Emissions²⁶ × EMFAC2011 Age 8 No-I/M/IM Ratio²⁷) - EMFAC2021 Age 8 Gasoline Vehicle Emissions²⁶

For ozone nonattainment areas, the estimated benefits include NOx and ROG in tons per day for summer season. For PM_{2.5} nonattainment areas, because EMFAC2011 does not reflect benefits from tailpipe PM emissions from the Smog Check Program, the annual NOx and ROG emission benefits are included instead, as these are precursors to secondary PM_{2.5} formation in the atmosphere.

It should be noted that, some of CARB's recent regulations, including Advanced Clean Cars II (ACC II) and Advanced Clean Fleets (ACF) were finalized and adopted after release of EMFAC2021. Therefore, the emission benefits estimated for this Measure using EMFAC2021 do not reflect the impacts from these regulations.

Instructions For Configuring and Running EMFAC2011

1. For the "I/M" scenario, in the main menu, click "Add New Scenario".



2. Select "State", "Use Average" in "Step 1 - Geographic Area", select modeled calendar year(s) in "Step 2 - Calendar Years", Select "Summer" for ozone NAAs or "Annual" for PM NAAs in "Step 3 - Season or Month", then click "Next".

²⁶ Include all gasoline vehicle classes subject to California Smog Check Program

²⁷ Derived based on light-duty vehicle classes under 8,500 lbs. in EMFAC2011

Basic scenario data - Select Area, Calculation Method, Calendar Year(s), and Season

Step 1 - Geographic Area

Area Type: State

State

Air Basin

District

County

Step 2 - Calendar Years

Select

8 calendar years in the range 2023 to 2035 selected

Step 3 -- Season or Month

Summer

Calculation Method

By Sub-Area

Use Average

Cancel Next > Finish

- Click "Default Title" in "Step 4 - Scenario Title for Reports", select "All" in "Step 5 - Model Years", select "Modify" in "Step 6 - Vehicle Classes" and choose "PC/T1/T2/T3" from the pop-up window, select "Default" in "Step 7 - I/M Program schedule", then click "Next".

Input 1 Input 2 Mode and Output Tech/IM CYr Basis . . .

Basic scenario data - Select or Enter Scenario Title

Step 4 -- Scenario Title for Reports

Statewide totals Avg Summer 8 CYrs 2023 to 2035 Default Title Default Title

In Emfac Impact Rate reports, titles over 40 characters will be truncated!

Step 5 - Model Years

All model years selected

All

Modify

Step 6 - Vehicle Classes

MODIFIED: 4 of 21 vehicle classes selected

All

Modify

Step 7 - I/M Program Schedule

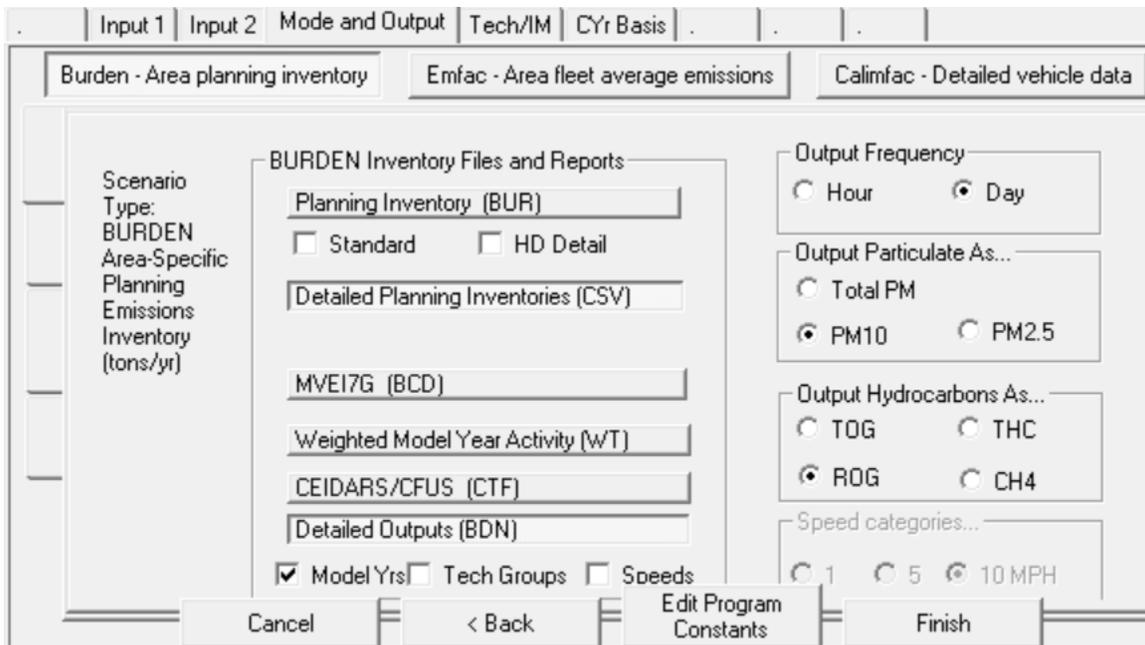
Standard I/M schedules

Default

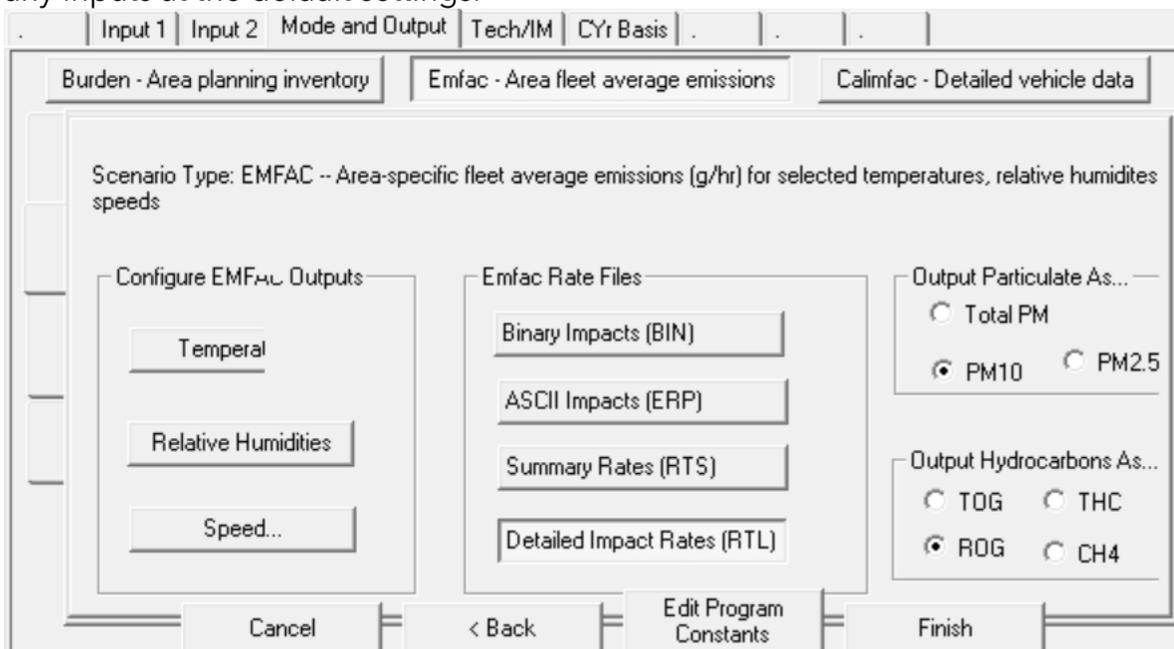
Modify

Cancel < Back Next > Finish

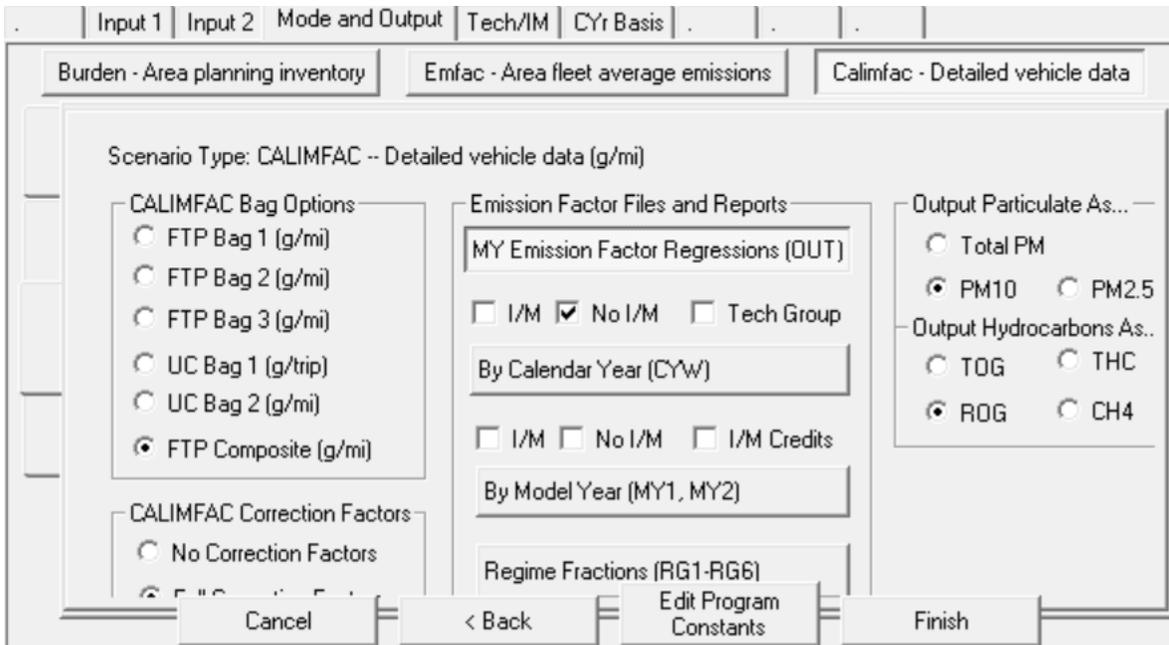
- In the tab "Burden - Area planning inventory", choose "Detailed Planning Inventories (CSV)" and click "Model Yrs". Select "Output Frequency" as "Day".



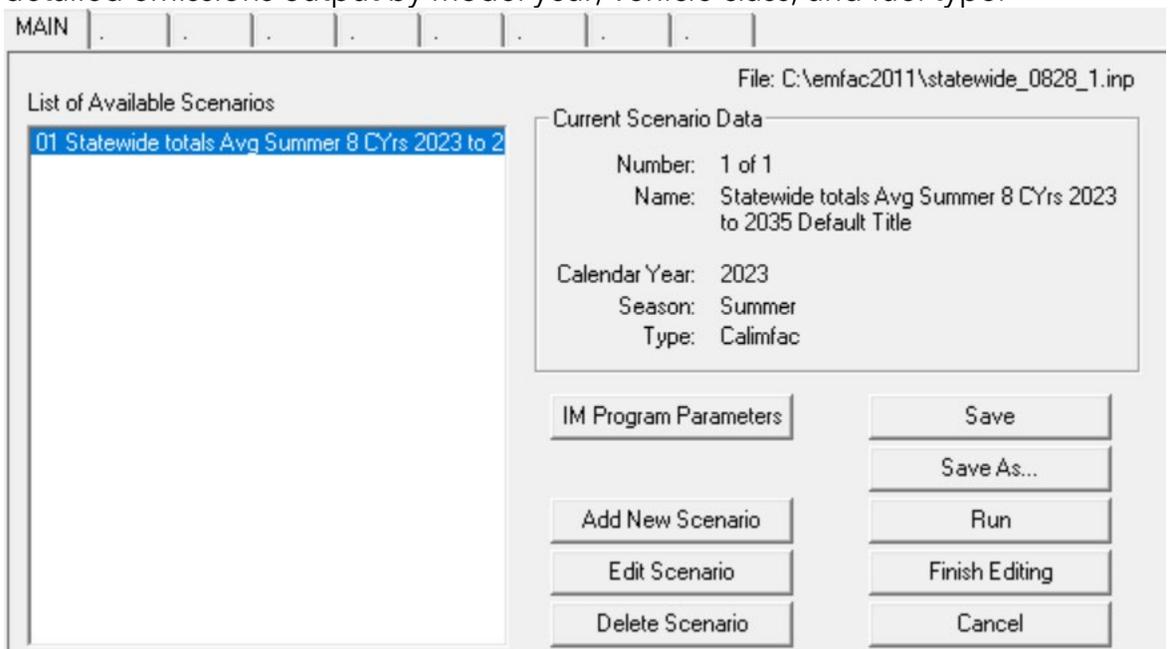
5. No need to change any inputs in tab "Emfac - Area fleet average emissions". Leave any inputs at the default settings.



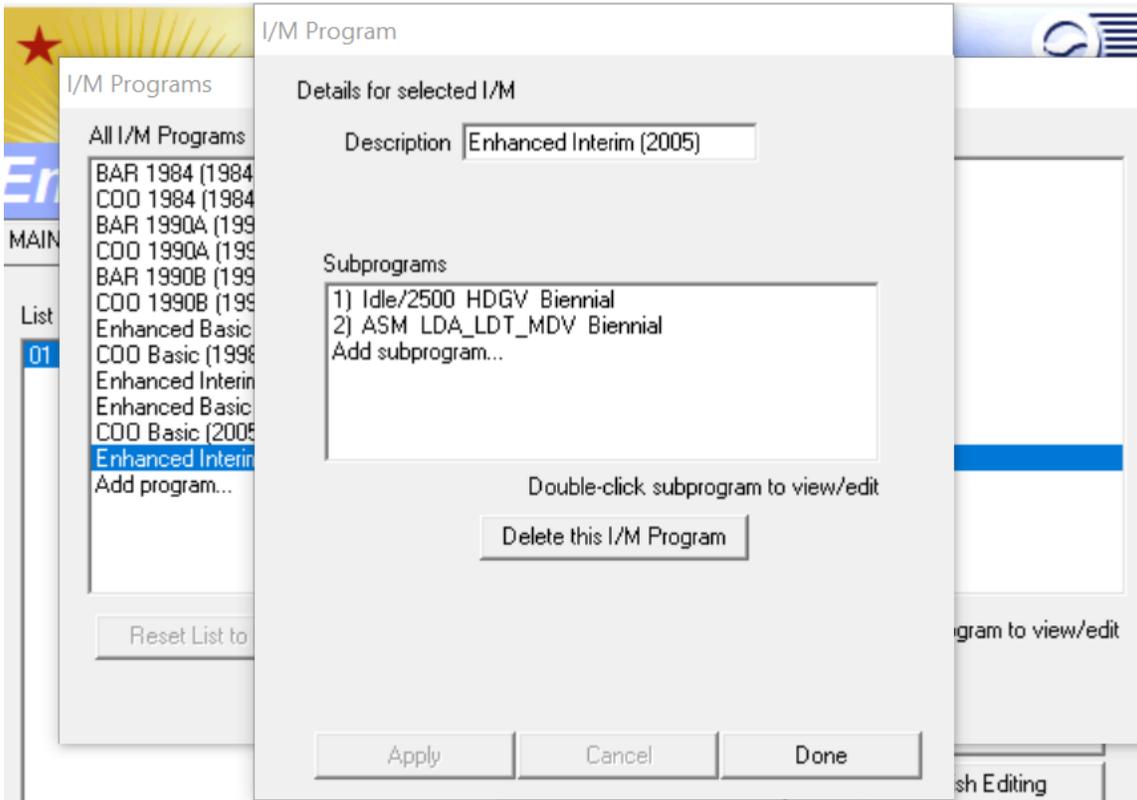
6. No need to change any inputs in tab "Calimfac - Detailed vehicle data". Leave any inputs at the default settings. Click "Finish" to go back to the main menu.



- In the "MAIN" menu, save the current input by clicking "Save", then click "Run" to start the model run. Only the .bdn output file is needed for data analysis, which shows the detailed emissions output by model year, vehicle class, and fuel type.



- For "No-I/M" scenario, repeat Steps 1 to 6, except that in the main menu, click "IM Program Parameters", double click each program and delete, and click "Done" to go back to the main menu. Then proceed to Step 7 to start the model run.



Appendix C: Carl Moyer Program Emissions Impacts Analysis Methodology

Moyer Program Emissions Reductions Estimates Methodology

CARB staff conducted analysis to determine the potential disbenefit of the Measure resulting from a potential loss in funding for the Moyer Program. If the Measure is triggered, the Moyer Program would receive less funding from fewer smog abatement fees being collected, as discussed in section 4C of this document. The calculation of the potential emissions disbenefit from losing Moyer Program funding consisted of two main components:

1. Vehicle Population
2. Moyer Program Statewide NOx Cost Effectiveness

The vehicle populations were estimated using EMFAC2021 and calculated as described in Appendix B. The statewide cost effectiveness was estimated as described in Appendix H of the Fiscal Year 2022-23 Funding Plan for Clean Transportation Incentives.²⁸

The methodology for calculating the potential emissions reductions loss is as follows:

First, CARB staff calculated the potential loss in funding by multiplying the smog abatement fee directed towards the Moyer Program of \$21 by the estimated vehicle population affected in each area for their respective attainment year. This results in the statewide total potential loss in funding if triggered in the respective area. An example calculation from a theoretical area missing attainment in 2023 is shown below.

$$\text{Total potential loss in funding resulting from an area missing attainment in 2023} = \text{Portion of smog abatement fee to Moyer} * 8\text{MYO vehicle population in nonattainment area in 2023}$$

Next, to find the area-specific foregone funding and related emission reductions, CARB staff used three years of historical Moyer Program funding allocations to local air districts to calculate the average proportion of funding typically awarded to each district. This district allocation calculation is done for each nonattainment area's corresponding local air district. An example calculation for a single local air district (District X) is shown below.

$$\text{District Allocation (\%)} = \frac{\text{Historical Average allocation to District X (\$)}}{\text{Total Carl Moyer Program Funding (\$)}}$$

The local air district allocation percentage for each area is then applied to the calculated loss in funding. This results in the potential loss in funding for each specific local air district.

²⁸ https://ww2.arb.ca.gov/sites/default/files/2022-10/proposed_fy2022_23_funding_plan_final.pdf

$$\text{Loss in funding for District X (\$)} = \text{District Allocation (\%)} * \text{Total potential loss in funding}$$

Divide the total loss in funding calculated for each area by the statewide NOx cost effectiveness and convert to tons per day. Each project is assumed to have a 10-year project life.

$$\text{Loss in reductions (tpd)} = \frac{\text{Loss in funding for District X (\$)}}{\text{statewide NOx cost effectiveness}/10/365 \left(\frac{\$}{\text{ton}} \right)}$$

The result is the total loss in potential emissions reductions for each district from foregone funding for Moyer Program projects.

Appendix D:
California Health and Safety Code § 44011(a)(4)(A) and (B)

State of California

HEALTH AND SAFETY CODE

Section 44011

44011. (a) All motor vehicles powered by internal combustion engines that are registered within an area designated for program coverage shall be required biennially to obtain a certificate of compliance or noncompliance, except for the following:

[REDACTED]

(4) (A) Except as provided in subparagraph (B), all motor vehicles four or less model-years old.

(B) (i) Beginning January 1, 2005, all motor vehicles six or less model-years old, unless the state board finds that providing an exception for these vehicles will prohibit the state from meeting the requirements of Section 176(c) of the federal Clean Air Act (42 U.S.C. Sec. 7401 et seq.) or the state's commitments with respect to the state implementation plan required by the federal Clean Air Act.

(ii) Notwithstanding clause (i), beginning January 1, 2019, all motor vehicles eight or less model-years old, unless the state board finds that providing an exception for these vehicles will prohibit the state from meeting the requirements of Section 176(c) of the federal Clean Air Act (42 U.S.C. Sec. 7401 et seq.) or the state's commitments with respect to the state implementation plan required by the federal Clean Air Act.

(iii) Clause (ii) does not apply to a motor vehicle that is seven model-years old in year 2018 for which a certificate of compliance has been obtained.

[REDACTED]

[REDACTED]

(Amended by Stats. 2017, Ch. 633, Sec. 1. (AB 1274) Effective October 10, 2017.)

**South Coast Air Basin Contingency Measure SIP Revision
for the 2015 8-Hour Ozone NAAQS Standard**

**APPENDIX B: CARB'S AREA SOURCE INFEASIBILITY
JUSTIFICATION**

Draft CARB Contingency Measure Analysis

CARB Reactive Organic Gases Area Source Measure Analysis

CARB adopted the *California Smog Check Contingency Measure* to address contingency measure requirements throughout the State. U.S. EPA proposed to approve the *California Smog Check Contingency Measure* as a contingency measure on December 20, 2023. The Smog Check Contingency Measure, if triggered in a nonattainment area, would reduce the exemption for vehicles that are 8 model years old and newer to seven model years old and newer, thereby increasing the number of vehicles subject to Smog Check. This measure, if triggered, would achieve additional NO_x and ROG reductions beyond what is currently achieved by the Smog Check Program by identifying additional emissions control equipment failures from vehicles previously exempt.

The *California Smog Check Contingency Measure* includes, in Appendix A, analysis on the feasibility of contingency measures related to CARB's mobile source control programs that target both ROG and NO_x. CARB staff are now evaluating potential options for a contingency measure achieving ROG reductions from area sources that the State has authority to regulate, including both CARB and Department of Pesticide Regulation (DPR)'s regulations (Table 2), to determine feasibility given the contingency measure requirements under the Clean Air Act, recent court decisions and U.S. EPA draft guidance. The State currently has programs in place for these area sources and has evaluated a variety of regulatory mechanisms within existing and new programs for potential contingency triggers. Each measure was evaluated on whether it could be implemented within 60 days of being triggered and achieve the necessary reductions within 1-2 years of being triggered. Additionally, the technological feasibility of each option was considered to assess whether the measure would be technologically feasible to implement. More stringent requirements may be unavailable or economically infeasible to implement, especially in the time frame required for contingency measure implementation. Some measures aim to reduce VOC emissions as opposed to ROG emissions. However, VOC and ROG emissions are virtually equivalent. Thus, both terms are used interchangeably throughout this document.

Challenges for CARB Measures

Based on CARB's feasibility analysis, which is similar to our mobile source analysis, there are a few common components of CARB area source regulations that limit the options for contingency measures. CARB regulations that require development of new emissions control technologies or new product formulations require a long lead time for implementation. Manufacturers would need lead time to research, plan, certify, manufacture, and deploy lower-emitting alternatives to meet a new or accelerated standard.

Draft CARB Contingency Measure Analysis

Additionally, consumer-based regulations necessitate that manufacturing is mature so that there is enough supply available to meet the additional demand. On the consumer side, additional time would be required for procurement implementation based on the new requirements. Thus, measures that require product turnover, new standards or reformulation are not appropriate to be used as a triggered contingency measure given the compressed timeline required for contingency.

CARB regulations are also technology-forcing, which makes it difficult to amend regulations or pull compliance timelines forward with only 1-2 years notice as industry needs time to research, plan, develop, and implement these new technologies and product formulations. It would be infeasible to require industry to purchase and install large numbers of new control technologies within one year if the technology is not readily available at a reasonable cost. CARB regulations are also the most stringent air quality control requirements in the country, so there are few opportunities to require additional stringency. CARB is driving sources under our authority to near-zero and zero-emissions everywhere feasible to provide for attainment of air quality standards across the State, and to support near-source toxics reductions and climate targets. However, these targets which are already being addressed in many CARB regulations also eliminate opportunities for a contingency measure.

Lastly, many of CARB's options for a contingency measure would require a full rulemaking process and would not be adopted by CARB and approved by U.S. EPA within the timeframe needed, making many of the options infeasible. Given U.S. EPA failure to submit and disapproval actions for the 75 ppb 8-hour ozone standard, sanction clocks have started and sanctions could be triggered in San Joaquin Valley, Coachella Valley, Mojave Desert and the Sacramento region in 2024. As such, CARB and these local air districts need to identify measure(s) that could realistically be adopted and submitted to U.S. EPA prior to that time. However, most CARB measures must go through a regulatory process that can take approximately five years from beginning development of a regulation to it being adopted by the CARB Board.

Based on CARB staff analysis, no additional measures were identified at this time to serve as a contingency measure to reduce ROG emissions beyond the California Smog Check Contingency Measure. More detail on the CARB staff analysis, including potential emission reduction options for each area source category are described in the following sections.

Consumer Products

Consumer products refer to chemically formulated products used by household and institutional consumers, such as detergents, personal care and cosmetics products, home

Draft CARB Contingency Measure Analysis

and garden products, and disinfectants. CARB regulations for consumer products aim to reduce the amount of VOCs, toxic air contaminants, and greenhouse gases that are emitted from using these consumer products.

CARB is actively seeking further emission reductions to support ozone attainment in the South Coast and elsewhere in California. Towards this end, CARB's 2022 State SIP Strategy includes a consumer products statewide emissions reduction commitment of 20 tons per day (tpd) of VOCs.

To achieve the 20 tpd VOCs emission reduction, CARB staff anticipates casting a wide net in its review of product categories. CARB staff plans to launch a survey in early 2024 to collect sales and formulation data for products sold recently in California. Survey data will identify opportunities to further reduce ozone formation from consumer products. Staff expects to bring regulatory proposals to the Board by 2027.

The Consumer Products Rulemaking Process

In granting CARB authority to regulate consumer products, which were previously regulated by local air pollution control districts and air quality management districts, it was the Legislature's intent to have a single set of regulatory requirements applicable statewide, rather than a patchwork of regulations. CARB's Consumer Products Regulation applies statewide.

For any consumer products rulemaking, proposed amendments are the culmination of a multi-year public process by CARB to identify the most promising, technically-sound strategies to effectively help California meet its air quality challenges. The recent 2021 rulemaking took close to seven years and included the following three phases of regulatory development: 1) development and implementation of the three-year survey; evaluation and publication of 2013 through 2015 Consumer and Commercial Products Survey data; 2) evaluation of potential regulatory strategies based upon the survey data; and 3) development and refinement of Proposed Amendments.

Manufacturers need lead time to reformulate existing products to meet new VOC standards. Based on previous rulemakings, five significant milestones exist and are associated with reformulating products to meet new consumer product regulatory requirements:

1) research and development; 2) efficacy testing; 3) stability testing; 4) safety testing; and 5) consumer acceptance testing. In addition, manufacturers must make modifications to product labels. While there is some opportunity for manufacturers to run these processes concurrently, often a problem in any one of these milestones require the manufacturer to start the process again.

Draft CARB Contingency Measure Analysis

When setting technology forcing standards, CARB may provide for a Technical Assessment prior to effective dates. This enables CARB to assess progress made by manufacturers in developing complying products. In cases where product development challenges result in infeasibility of timely implementation, the assessment could result in amendments to the standards or to extensions in compliance deadlines.

Additionally, technology forcing standards often require modifications to facilities, equipment, and manufacturing processes. This would be the case if a product is reformulated to use compressed gas propellant instead of liquefied gas propellant. Use of compressed gas propellant requires the purchase and installation of new equipment and modifications to facility assembly lines, necessitating sufficient lead time for implementation as well as certainty about implementation dates for the technology forcing standards. CARB staff will be evaluating increased use of compressed gas propellant for the upcoming consumer product rulemaking.

Trigger Feasibility

To provide reductions qualifying for contingency purposes, CARB would need to adopt regulatory amendments which yield emission reductions that could be implemented within a short period of time from a triggering event.

For a given product category for which CARB proposes more stringent VOC standards, CARB cannot call for earlier implementation of those standards for contingency purposes. This is because CARB already requires implementation under short timelines to maximize air quality benefits in support of expeditious attainment of ambient air quality standards.

Neither can CARB set lower limits for products that would be produced and warehoused, but not sold unless a triggering event occurred. Warehousing of “contingency” products would be cost prohibitive for manufacturers and would not provide the Consumer Products Program with the maximum feasible air quality benefits, as required by the Legislature. Some consumer products also have limited shelf life and given the uncertainty of when a triggering event may occur, such an approach is not feasible.

Technological Feasibility

The Legislature, in Health and Safety Code (H&SC) Section 41712(b)(2) and 41712(d), stipulates that CARB’s consumer product regulations must set standards which are commercially and technologically feasible. Therefore, during every consumer products rulemaking, CARB sets VOC limits that are the most technologically and commercially feasible at the time.

Draft CARB Contingency Measure Analysis

CARB's Consumer Products Regulation does not require lower VOC content products in some parts of California, which could then be required in other parts of California in need of contingency reductions.

When proposing more stringent VOC standards, CARB cannot establish two increasingly restrictive sets of VOC limits: one limit in support of attainment, which would go into place by a defined date; and a second, more stringent limit which would only be implemented if contingency needs were triggered. This is because: (1) State law, stated in H&SC section 41712(b)(1), requires CARB to adopt the most stringent feasible standards for attainment purposes; and (2) further reductions from consumer products are needed for attainment of ozone ambient air quality standards.

Neither could CARB set a single, more restrictive VOC standard, implement those requirements, and then hold back a portion of the anticipated emission reductions for contingency purposes while still dedicating the majority of accruing reductions towards attainment targets. In such a case, additional actual emission reductions would not occur if contingency requirements were triggered. This approach would therefore not satisfy requirements for contingency reduction.

Even if no further VOC reductions were needed for attainment, setting more stringent standards for contingency purposes would still not be a viable undertaking. This is because the testing and development of lower VOC products meeting more stringent standards could take years and much investment by manufacturers. Timelines would not mesh with the quick turnaround time needed for contingency reductions. In short, CARB cannot require development of new consumer products just in case additional emission reductions are needed. This means CARB cannot produce contingency reductions by setting more stringent standards for consumer product categories other than those which CARB would regulate further to secure the 20 tpd VOC emission reduction target for attainment purposes.

Further, CARB cannot, when seeking reductions in the very near-term (and consistent with contingency reduction timelines), rely on other jurisdictions whose regulations are resulting in lower-emitting consumer products which they could then offer for sale in California. California's Consumer Products Program is world-leading, cutting-edge and technology forcing. Manufacturers have not already developed products, and marketed them elsewhere, which they could direct to California in case a need for contingency reductions is triggered.

In summary, a consumer product contingency measure seeking additional emission reductions either by setting more restrictive standards, or by accelerating effective dates of standards, is infeasible.

Draft CARB Contingency Measure Analysis

Oil and Gas

For decades, air districts with significant oil production have adopted and implemented rules designed to reduce criteria pollutant precursor emissions from the oil and gas sector to meet national ambient air quality standards (NAAQS) and Clean Air Act requirements. The air district rules control emissions of reactive organic gases (ROG) from tanks, separators, and compressors, and specify requirements for leak detection and repair (LDAR). The air district rules do not cover methane specific sources.

In 2017, CARB adopted the Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities (also known as the Oil and Gas Methane Regulation) to address methane emissions from equipment and processes not already controlled for ROG purposes by existing air district rules. Although the Oil and Gas Methane Regulation is intended to reduce methane emissions, many of the covered sources also emit ROG as co-pollutants, and therefore the regulation also reduces ROG emissions. Only four air districts in California with nonattainment areas have oil and gas equipment subject to the regulation: Sacramento Metropolitan Air Quality Management District, San Joaquin Valley Air Pollution Control District, South Coast Air Quality Management District, and Ventura County Air Pollution Control District. The air district rules and the Oil and Gas Methane Regulation complement one another and together reduce ROG emissions from California's oil and natural gas sector.

Starting in 2012, U.S. EPA established regulations to reduce air pollution from the oil and natural gas industry consisting of new source performance standards. U.S. EPA also promulgated a Control Techniques Guideline in 2016 for the Oil and Natural Gas Industry which requires all states with applicable nonattainment areas to meet the prescribed levels of control in order to satisfy reasonably available control technology requirements. The CTG requirements are met in California via air district rules and CARB's submittal of the Oil and Gas Methane Regulation. In December 2023, U.S. EPA finalized updated regulations for the oil and natural gas industry including more stringent new source performance standards and, for the first time, Emissions Guidelines. U.S. EPA's recent Emissions Guidelines will require that CARB amend the Oil and Gas Methane Regulation to meet the more stringent requirements.

Methane and ROG emissions can originate from oil and gas infrastructure when natural gas is either intentionally released ("vented" emissions) or unintentionally leaked ("fugitive" emissions). Intentional releases can occur due to process designs (e.g., as a fluid to operate pneumatic devices), for safety or maintenance reasons, or for when no other control or disposal options exist (where allowed). Unintentional leaks can occur due to factors such as defects or wear in connections, valves, seals, and similar mechanisms, or due to process

Draft CARB Contingency Measure Analysis

upsets, system malfunctions, or human error. Vented emissions can be controlled primarily by replacing equipment with lower-emitting models or adding vapor collection systems to equipment, and the further controls that will be required under the recent U.S. EPA Emissions Guidelines represent all controls that are technologically feasible. Fugitive emissions are addressed through leak detection and repair (LDAR) to find and fix unintentional leaks. In each of these areas, there are no additional available feasible control measures that could meet the requirements of a contingency measure.

First, there are not currently any additional measures in the Oil and Gas Methane Regulation that could be triggered without undertaking amendments to the regulation. The process for amending a regulation takes years to complete and requires the development of new measures, stakeholder engagement, and the formal regulatory process itself.

Second, even if the length of the regulatory process were not a barrier, no available surplus emission reductions could reasonably be implemented within the short timeframe required upon a triggering event. Implementation of additional controls requires at least two to three years for oil and gas facilities to comply with. New controls are not easily installed on equipment and would take additional time to upgrade, which likely does not fit in the contingency timeline required. Each of the potential emission reduction mechanisms in the Oil and Gas Methane Regulation are analyzed below:

- Reduce venting through equipment replacement or vapor control (control venting emissions):
 - The Oil and Gas Methane Regulation already includes strict venting standards for most categories of equipment designed to vent natural gas as part of normal operation. The areas where further control of vented emissions may be feasible are all being addressed by U.S. EPA's Emissions Guidelines (finalized December 2023), which are standards that CARB must meet for existing sources to demonstrate compliance with the Clean Air Act; these are measures that must be implemented and cannot be held in reserve for use as triggered contingency measures. These include banning all associated gas venting, requiring all pneumatic controllers to be zero-emission, and requiring minimization of emissions from liquids unloading to the greatest extent possible.
- Expand/increase LDAR (control fugitive emissions):
 - Under the Oil and Gas Methane Regulation, LDAR is already mandated on a quarterly basis using a very sensitive methodology (U.S. EPA's Method 21). The only exemption that results in a significant number of sources not being subject to LDAR is for equipment handling exclusively heavy oil¹, which is not

¹ Oil with an API gravity of less than 20.

Draft CARB Contingency Measure Analysis

economically feasible to control based on analysis using currently available data.

In summary, there are no new technologically feasible control measures that CARB can implement in the Oil and Gas Methane Regulation that could meet the triggering timelines and other requirements, and are available to use as contingency measures.

Petroleum Marketing – Vehicle Refueling

Vapor recovery systems are installed at gasoline dispensing facilities (GDFs) to collect, contain, and return gasoline vapors that would otherwise escape into the atmosphere. Gasoline vapor emissions contain smog forming volatile organic compounds (VOCs) that are controlled in two phases at GDFs. Phase I vapor recovery collects vapors displaced from a storage tank when a cargo tank truck delivers gasoline. Phase II vapor recovery collects and stores vapors displaced during the transfer of gasoline from the GDF storage tanks into the vehicle tank. Stored gasoline vapors in the GDF tanks are then transferred into gasoline cargo tank trucks during Phase I activities and returned to gasoline terminals for processing. CARB regulations establish statewide performance standards for vapor recovery systems that must be achieved during the transfer and storage of gasoline. In addition, all vapor recovery systems must undergo CARB certification tests to demonstrate compliance with applicable performance standards before those systems can be sold, offered for sale, or installed in California.

Vapor recovery system performance standards for GDFs have become more stringent over the years. Since 2001, CARB has adopted over a dozen significant advancements as part of the Enhanced Vapor Recovery (EVR) program. Phase I EVR requires more durable and leak-tight components, along with an increased collection efficiency of 98%. Phase II EVR includes three major advancements: (1) dispensing nozzles with less spillage and required compatibility with ORVR (onboard refueling vapor recovery) vehicles, (2) a processor to manage the headspace pressure within the GDF storage tank, and (3) an in-station diagnostic (ISD) system that provides warning alarms to alert a GDF operator of potential vapor recovery system malfunctions. Phase I EVR was fully implemented in 2005 and Phase II EVR was fully implemented by 2011.

Additionally, CARB's air toxic control measure for benzene requires retail GDFs to install Phase I and Phase II systems to reduce public exposure. Exceptions to the measure include gasoline (1) dispensed from or transferred to a storage tank with a capacity less than 260 gallons, (2) dispensed to implements of animal husbandry; or (3) dispensed to vehicles with fuel tanks less than 5 gallons capacity.

Draft CARB Contingency Measure Analysis

Since the implementation of Phase I and Phase II EVR in 2011, CARB staff has made additional improvements to the vapor recovery program. For GDF equipped with underground storage tanks, a total of four regulatory amendments were completed between 2011 and 2023 to strengthen performance standards, adjust implementation dates to reflect evolving technology, clarify dimension requirements for nozzles and vehicle fill pipes, and improve cost effectiveness for system upgrade requirements. Two of the most recently implemented control measures, hose permeation and more stringent nozzle spillage standard, are described below.

- Hose Permeation Standard:

CARB adopted performance standards for gasoline dispensing hose permeation on July 26, 2012. The intent of this standard is limiting the amount of gasoline that permeates through the dispensing hose. Hose permeation performance standards only apply to hoses in which liquid gasoline contacts the outer hose wall, specifically: Phase II vacuum assist and conventional hoses (latter are installed in facilities that are exempt from Phase II because they fueled predominately vehicles equipped with ORVR). Existing facilities subject to the performance standard were allowed four years from the effective date to attain compliance. The effective date is defined as the date when the first dispensing hose meeting the performance standard is certified by CARB.

The first conventional and vacuum assist hoses that met the new permeation standard were certified by CARB on June 10, 2014, and September 24, 2014, respectively. These certification dates establish the effective dates and associated four-year periods (commonly referred to as "the four-year clock") for existing subject GDFs to comply. Existing GDFs that used conventional hoses and vacuum assist hoses had until June 10, 2018, and September 24, 2018, respectively to comply with the low permeation hose standard. New GDFs constructed after the effective dates that use vacuum assist or conventional hoses are required to install low permeation hoses at the time of construction.

- More Stringent Nozzle Spillage Standard:

In April 2015, CARB adopted new performance standards and specifications for Enhanced Conventional (ECO) nozzles that are installed at non-retail GDFs, which are exempt from Phase II requirements by district rules. These GDFs fueled predominantly vehicles that are equipped with ORVR, which collects displaced vapor during vehicle refueling.

CARB staff have compiled and evaluated mass emission factors for nozzle spillage based on CARB certification test data for three EVR nozzles and two ECO nozzles. In April 2020,

Draft CARB Contingency Measure Analysis

staff found that the mass emission factors based on certification data for all five nozzles are substantially lower than applicable performance standards. This finding demonstrated nozzles are performing much better than predicted for EVR implementation at the time CARB adopted the EVR regulations.

Consequently, in December 2020, the Board approved a more stringent performance standard of 0.05 lbs/kgal for nozzle spillage for both EVR and ECO nozzles to preserve emission reductions that are already occurring and prevent emissions from increasing.

Recent analysis indicates that CARB certified vapor recovery systems designed for use at GDFs are well over 90% effective² in reducing VOC emissions that would otherwise be emitted to the atmosphere. Given the maturity and robustness of the program and the stringency of existing control measures that have been implemented statewide, there are no available additional control measures that would be feasible to implement within the timeframes required for contingency measures. Even if more stringent control measures could be adopted, they would not be able to be implemented in the contingency timeframe required as manufacturers and retailers would need more than two years of lead-time, as has been provided in the past, to comply with new standards.

CARB staff believes future amendments will improve existing test procedures and ease the burden of compliance for GDF operators without causing any increase in emissions or costs. Further, absent any changes to vapor recovery controls, CARB staff expects that gasoline vapor emissions will track proportionally to fuel dispensed. As California transitions to more fuel-efficient vehicles, zero emission vehicles, and alternative fuel sources, gasoline consumption and associated vapor emissions are expected to decrease. However, as long as gasoline remains a major fuel source, CARB will need to maintain an active and effective vapor recovery program.

In summary, California has the most comprehensive vapor recovery program applicable to GDFs in the country, and there are no new technologically feasible control measures that could meet the triggering timelines and other requirements, and are available to use as contingency measures. California's program includes:

1. rigorous performance standards for Phase I transfer, Phase II transfer, In-Station Diagnostic systems, hose permeation, storage tank pressure management, and nozzle spillage,
2. strong enforcement of performance standards by local air districts, and

² https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2023/vapor_recovery_2023/isor.pdf

Draft CARB Contingency Measure Analysis

3. going well beyond US EPA's Stage I (Phase I in California), which is the sole focus of US-EPA's vapor recovery requirements.

Going forward, the vapor recovery program will remain an important part of California's efforts to control regional ozone levels and reduce public exposure to benzene.

Petroleum Marketing – Cargo Tanks

In California, gasoline vapor emissions are controlled to reduce emissions of air pollutants, specifically VOCs and various toxic air contaminants (TACs) such as benzene. Emissions are controlled during the transfer of gasoline from storage tanks at refineries or terminals/bulk plants to tanker trucks also called cargo tanks (CTs). Cargo tanks transport gasoline to service stations also called GDFs. The Cargo Tank Vapor Recovery Program (CTVRP) regulations require annual testing of CTs to ensure that they do not exceed the allowable leak rate. Such tests are performed by CT owner/operators or independent testing contractors. Test results are submitted to CARB CTVRP staff for review and provide the basis for issuing a certification document with a decal, which must be renewed annually. To ensure the integrity of the program, CTVRP staff monitors the testing conducted by CT owners, operators, and contractors. Additionally, CTVRP staff perform random inspections and testing of CTs. Also, loading facilities are prohibited from transferring gasoline to CTs with invalid or expired certifications. Because of the severe and unique air pollution problems facing California, CARB's gasoline vapor control standards for CTs are more stringent than comparable federal standards.

CARB first adopted the cargo tank vapor recovery certification regulations on April 18, 1977. These regulations established a five-minute static pressure test with an allowable leak rate to prevent excessive gasoline vapor emissions and a one-minute test for CARB inspectors to monitor CTs loaded with gasoline. There have been six amendments to this regulation (1984, 1995, 1998, 2013, 2017, 2023). These amendments were mostly administrative in nature. However, the 1995 amendment reduced the allowable leak rate by 50%, making the CTVRP the strictest emission standards in the nation.

Altering of a CT design to control emissions would require input and approval from federal agencies such as Department of Transportation (DoT) and U.S. EPA, along with State agencies such as State Fire Marshal and California Highway Patrol. Getting such approval to implement new controls may take years due to the cumbersome approval process. The CTVRP already requires more stringent emission standards than the U.S. EPA. The current CARB and U.S. EPA standard is measured in Inches of Water Column (WC"). As an example, a cargo tank in California is not allowed to leak more than 0.5 WC" (0.018psi) in a five-minute test. CTs are as vapor tight as the current industry standards and design allows for.

Draft CARB Contingency Measure Analysis

There is currently no design or technology that can reduce this number. Additionally, as mentioned, design alterations would require numerous and lengthy federal, State(s), and local municipalities approvals. Implementation of any new standards would also require long lead times to deploy new technologies and would likely take more than two years. As the population of zero emission vehicles increases on California roads, emissions from CTs will be reduced due to a decline in demand for gasoline.

In summary, due to the timelines involved in development of technology, altering CT designs, and anticipated drop in gasoline demand, there are no new technologically feasible control measures in the CTVRP that could meet the triggering timelines and other requirements, and are available to use as contingency measures.

Portable Fuel Containers (Gas Cans)

Portable Fuel Containers (PFCs), or gas cans, are used to fill a variety of equipment, including lawnmowers, vehicles, and personal watercraft. However, spillage and evaporative emissions can occur, which can result in ozone-forming smog and health related problems. In California, gas cans use low permeation materials and automatic sealing nozzles to minimize or eliminate spillage and evaporative emissions. All gas cans sold in California must be certified by CARB as meeting the low-emission requirements.

CARB staff analyzed PFCs to identify potential contingency measure options. It would not be possible to begin implementation of any contingency measures for PFCs within 60 days. CARB does not regulate consumer use of PFCs and must achieve emission reductions through performance requirements, including emission standards, for new PFCs. Manufacturers would need more than 1-2 years to design, certify, and manufacture PFCs that meet more stringent emission standards. Additionally, CARB regulations typically need to allow additional time for sell-through provisions to allow for consumers and retailers to transition to the new products, which further extends the implementation timeline. Adopting more stringent emission standards is not feasible to implement as a contingency measure because the regulatory process would take approximately 5 years from start to finish. The standards currently in place are also the most stringent standards across the nation.

In summary, there are no new technologically feasible control measures in the PFC regulations that could meet the triggering timelines and other requirements and are available to use as contingency measures.

Pesticides

Pesticides are used for urban and agricultural pest management across the State and are an area-wide source of ROG and other types of emissions. Pesticides are regulated under both

Draft CARB Contingency Measure Analysis

federal and state law. Under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), the U.S. EPA has authority to control pesticide distribution, sale, and use. The Department of Pesticide Regulation (DPR) has primary and broad authority to regulate the sale and use of pesticides in California. The pesticide element of the ozone SIP requires DPR to develop and implement regulations to reduce ROG emissions by specified amounts from agricultural and structural pesticide applications in nonattainment areas. CARB is supporting DPR to use its broad authorities to reduce ROG emissions as well as limit harmful exposures to pesticides impacting communities across the State.

DPR can generally reduce exposures to pesticides through the development and implementation of necessary restrictions on pesticide sales and use and by encouraging integrated pest management. Mitigation measures may be implemented by several methods, including regulations, local permit conditions, pesticide label changes, or product cancellation. Current regulations set limits on applications of certain pesticides and specify methods for application to protect public health. DPR regulations have been found by U.S. EPA to meet RACT, RACM, and BACM requirements as a part of past SIP submittals. Most recently, as a part of the 2022 State SIP Strategy developed to support of attainment of the 70 ppb ozone standard across California, DPR committed to update their 1,3-Dichloropropene (1,3-D) regulations for health risk mitigation and volatile organic compound emissions reductions. The regulatory updates address both cancer and acute risk to non-occupational bystanders through requirements including those on applicators to use totally impermeable film tarpaulins or other mitigation measures that provide a comparable degree of protection from exposure. DPR submitted the rulemaking documents to the Office of Administrative Law on November 7, 2023, for final review and if approved will go into effect on January 1, 2024.

DPR has divided pesticide products into two groups for SIP purposes: fumigants and non-fumigants. The lead time needed to develop regulations for both groups of pesticide products may not fit in the contingency timeline required. For fumigant pesticide products, the primary measure to reduce ROG emissions is to change fumigation methods, such as deeper injection into the soil and covering fumigated areas with tarps that have low permeability. Developing new fumigation methods normally requires several years of research followed by rulemaking that usually requires two years or more to complete. For non-fumigant pesticide products, the primary measure to reduce ROG emissions is to change product formulations to reduce the ROG content. This also takes several years of research and rulemaking to complete. Additionally, changing product formulation normally requires review and registration of a new product by U.S. EPA and this takes a year or more to complete. For both fumigant and non-fumigant products, little work on contingency measures can be done beforehand due to changing pesticide use patterns. Pesticide products that contribute the most emissions currently may not be the ones that contribute

Draft CARB Contingency Measure Analysis

the most in the future due to changing cropping patterns, introduction of new pesticide products, and other factors.

Further, DPR regulations are the most stringent pesticide controls in the country and represent all measures that are technologically feasible at this time. For example, U.S. EPA's Office of Pesticide Programs also works to reduce emissions to reduce toxic exposure and their measures are implemented through nationwide product label changes. U.S. EPA has nearly completed its most recent review of 1,3-D with minimal label changes, while DPR's 1,3-D regulations include fumigation method requirements that will further reduce emissions. CARB and DPR are not aware of any other states with regulatory requirements to reduce ROG emissions from pesticide products.

At this time, no additional measures for regulating pesticides have been identified for use as a contingency measure. However, DPR has developed a process to identify possible additional control measures through its roadmap for sustainable pest management (SPM). SPM is a process of continual improvement that integrates an array of practices and products aimed at creating healthy, resilient ecosystems, farms, communities, cities, landscapes, homes, and gardens. SPM examines the interconnectedness of pest pressures, ecosystem health, and human wellbeing. Going forward, CARB will continue to partner with DPR and explore the best methods to limit pesticide exposures, while also reducing emissions of volatile organic compounds.

Summary

At this time, CARB is including a zero-emission component in most of our regulations, both those already adopted and those that are in development, and the vast majority of these regulations are statewide in scope. Beyond the wide array of sources CARB has been regulating over the last few decades, and especially considering those we are driving to zero-emission, there are few area sources of emissions left for CARB to implement additional controls upon under its authorities for contingency purposes in the Coachella Valley.

Beyond the Smog Check Contingency Measure, no additional contingency measures were identified for mobile and non-mobile sources through CARB's analysis as shown in Table 1. Considering the air quality challenges California faces, if a measure achieving such reductions were feasible, CARB would implement the measure to support expeditious attainment of the NAAQS as the Clean Air Act requires rather than withhold it for contingency measure purposes. Further, should there be a measure achieving the required emission reductions, the measure would likely take more than 1-2 years to implement

Draft CARB Contingency Measure Analysis

during which time the expected emission benefits could be reduced due to natural turnover of products and equipment.

Table 1: Assessment of Potential CARB Contingency Measures

| Emission Source | Regulatory Programs | Latest Amendment Requirements | Contingency Options | Trigger Feasibility | Technological Feasibility |
|-----------------|-------------------------------------|--|--|--|---|
| Pesticides | Fumigant products ROG reduction | Effective 4/1/16; Revise existing field fumigation methods.; Effective 1/1/24; Restrict use of 1,3-D for only agricultural commodities, set limits on application rate and methods to limit exposure/ emissions. | Require more stringent limitations and stricter application methods. | No; Trigger for use limit for 4 NAAs included in existing regulations; Standards requirements need years of lead time to be implemented; infeasible to pull forward standards within 60 days. Infeasible to achieve reductions within two years. | No; Research needed to achieve additional reductions. |
| | Non-fumigant products ROG reduction | Effective 11/1/13; Sale and use restrictions for products that have any of 4 primary active ingredients and applied to any of 7 crops in San Joaquin Valley. | Require use of "low-VOC" products. | No; Trigger requiring "low-VOC" products that have any of 4 primary active ingredients and applied to any of 7 crops in San Joaquin Valley included in existing regulations; Standards requirements need years of lead time to be implemented; infeasible to pull forward standards within 60 days. Infeasible to achieve reductions within two years. | No; Research needed to achieve additional reductions. |

Draft CARB Contingency Measure Analysis

| Emission Source | Regulatory Programs | Latest Amendment Requirements | Contingency Options | Trigger Feasibility | Technological Feasibility |
|-------------------|--|--|---|---|--|
| Oil and Gas | Oil and Gas Methane Regulation | Adopted 3/23/17. Requires quarterly monitoring of methane emissions and some equipment will require vapor collection systems. | Reduce venting through equipment replacement or vapor control (control venting emissions). Expand/increase LDAR (control fugitive emissions). | No; Standards and requirements need years of lead time to be implemented; infeasible to pull forward standard within 60 days. Purchasing would not happen immediately or within one year of trigger; infeasible to achieve reductions within one 1-2 years. | No; only feasible controls are required to be implemented under U.S. EPA's Emissions Guidelines (finalized December 2023). No; current LDAR requirements are the most stringent in the country. |
| Consumer Products | Consumer Products | Amended 3/25/21. Lowered VOC standards for hair-care products, personal fragrance, manual aerosol air fresheners, and aerosol crawling bug insecticide. | Adopt and implement more stringent emission standards; pull forward compliance deadlines | No; Standards and requirements need years of lead time to be implemented; infeasible to pull forward standard within 60 days. Purchasing and manufacturing would not happen immediately or within one year of trigger; infeasible to achieve reductions within one 1-2 years. | No; cannot require manufacturers to develop new formulations and products only for contingency and to warehouse just for contingency purposes. Also, since California has the most stringent requirements, cannot bring in lower-emitting products already manufactured for other markets. |
| Consumer Products | Portable Fuel Container (PFC) Regulation | Amended 4/1/2017. Updated certification test fuel, established 4 year certification term, and streamlined test procedures with U.S. EPA. | Adopt and implement more stringent emission standards | No; Standards requirements need years of lead time to be implemented; infeasible to enforce more stringent standards within 60 days. Purchasing would not happen immediately or within one year of trigger; infeasible to achieve reductions within 1-2 years. | No; standards currently in place are the most stringent. |

Draft CARB Contingency Measure Analysis

| Emission Source | Regulatory Programs | Latest Amendment Requirements | Contingency Options | Trigger Feasibility | Technological Feasibility |
|---|-----------------------------------|--|---|---|--|
| Cargo Tanks (hauling gasoline) | Cargo Tank Vapor Recovery Program | Amended 10/01/23, Administrative in nature; corrected grammatical errors, removed imprecise language regarding alternative test procedures. | Setting more stringent standards | No; technology in this field has no new innovations and standards are more stringent than federal guidelines. | No; current standards and requirements are the most stringent in the nation and current technologies are most advanced. |
| Petroleum Marketing - Vehicle Refueling | Enhanced Vapor Recovery | <p>Adopted July 26, 2012; performance standards for gasoline dispensing hose permeation</p> <p>April 2015; New performance standards and specifications for ECO Nozzles, including a more stringent nozzle spillage standard over EVR nozzles.</p> <p>December 2020; more stringent performance standard of 0.05 lbs/kgal for nozzle spillage for both EVR and ECO nozzles</p> | Adopt and implement more stringent emission and performance standards | Standards requirements need years of lead time to be implemented; infeasible to enforce more stringent standards within 30 or 60 days. Purchasing would not happen immediately or within one year of trigger; infeasible to achieve reductions within one year. | California has the most comprehensive vapor recovery program applicable to GDFs in the country; no additional opportunities for increased stringency |

**South Coast Air Basin Contingency Measure SIP Revision
for the 2015 8-Hour Ozone NAAQS Standard**

**APPENDIX C: TRANSPORTATION CONTROL MEASURES
INFEASIBILITY JUSTIFICATION**

Transportation Control Measures (TCMs)

Transportation Control Measures (TCMs) are strategies that reduce motor vehicle emissions by decreasing vehicle trips, vehicle usage, vehicle miles traveled (VMT), vehicle idling, and traffic congestion. TCMs are either one of the 16 types listed in CAA Section 108 (refer to the list below) or any other measures aimed at reducing emissions or concentrations of air pollutants from transportation sources by decreasing vehicle usage or altering traffic flow and congestion conditions. According to the U.S. EPA's Transportation Conformity Regulations, measures based on vehicle technology, fuel, or maintenance that control emissions from vehicles under fixed traffic conditions are not considered TCMs.

List of TCMs under CAA Section 108:

- (i) Programs for improved public transit;
- (ii) Restriction of certain roads or lanes to, or construction of such roads or lanes for use by, passenger buses or high occupancy vehicles;
- (iii) Employer-based transportation management plans, including incentives;
- (iv) Trip-reduction ordinances;
- (v) Traffic flow improvement projects that achieve emission reductions;
- (vi) Fringe and transportation corridor parking facilities serving multiple occupancy vehicle programs or transit service;
- (vii) Programs to limit or restrict vehicle use in downtown areas or other areas of emission concentration particularly during period of peak use;
- (viii) Programs for the provision of all forms of high-occupancy, shared-ride services;
- (ix) Programs to limit portions of road surfaces or certain sections of the metropolitan area to the use of non-motorized vehicles or pedestrian use, both as to time and place;
- (x) Programs for secure bicycle storage facilities and other facilities, including bicycle lanes, for the convenience and protection of bicyclists, in both public and private areas;
- (xi) Programs to control extended idling of vehicles;
- (xii) Programs to reduce motor vehicle emissions, consistent with title II of the CAA, which are caused by extreme cold start conditions;
- (xiii) Employer-sponsored programs to permit flexible work schedules;

- (xiv) Programs and ordinances to facilities non-automotive travel, provision and utilization of mass transit, and to generally reduce the need for single-occupant vehicle travel, as part of the transportation planning and development efforts of a locality, including programs and ordinances applicable to new shopping centers, special events, and other centers of vehicle activity;
- (xv) Programs for new construction and major reconstructions of paths, tracks or areas solely for the use by pedestrian or other non-motorized means of transportation when economically feasible and in the public interest; and
- (xvi) Program to encourage the voluntary removal from use and the marketplace of pre-1980 model year light duty vehicles and pre-1980 model light duty trucks.

In terms of transportation planning and programming, the Basin falls under the jurisdiction of the Southern California Association of Governments (SCAG) and the four County Transportation Commissions (CTCs) in the Basin, namely Los Angeles County Metropolitan Transportation Authority, Riverside County Transportation Commission, Orange County Transportation Authority and the San Bernardino County Transportation Authority. Consequently, TCM projects are proposed, implemented, and updated by SCAG and CTCs as part of the ongoing transportation planning and programming processes. SCAG serves as the Metropolitan Planning Organization (MPO) for the Basin.

SCAG and the CTCs have established a comprehensive and formal process for identifying, evaluating, and selecting TCMs. CTCs, through an extensive project development and selection process, serve as the lead agencies responsible for recommending transportation projects, including TCM projects within the Basin, for funding under SCAG's long-range Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

Connect SoCal 2024 is the currently adopted RTP/SCS.¹ The RTP/SCS is updated every four years to incorporate changes in trends, assess progress made on projects, and adjust growth forecasts for population and employment changes. This long-range RTP/SCS integrates land use and transportation strategies aimed at achieving California Air Resources Board (CARB) greenhouse gas emissions reduction targets, providing a vision for transportation investments throughout the region. By utilizing growth forecasts and economic trends projecting over a period of more than 20 years, the RTP/SCS considers the role of transportation within the broader context of land use, the economy, the environment, and future quality-of-life goals. It identifies regional transportation strategies and a Sustainable Communities Strategy to address our mobility needs, air quality, and the challenges of climate change.

The RTP/SCS is developed through a collaborative process guided by SCAG's governing board, the Regional Council, its Policy Committees, Sub-committees, the Transportation Working Group, numerous technical advisory committees, working groups, and task forces, CTCs, subregions, local governments, state and federal agencies, environmental and business communities, tribal governments, non-profit groups, as well as the general public.

¹ <https://scag.ca.gov/connect-socal>

In addition, the TCM projects in the Basin are programmed and updated as part of SCAG's short-term Federal Transportation Improvement Program (FTIP) development process. The FTIP implements the RTP/SCS and is updated every two years.

SCAG develops the FTIP in partnership with the CTCs of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura, as well as the California Department of Transportation (Caltrans) Districts 7, 8, 11, and 12. The FTIP is a multimodal list of capital improvement projects to be implemented over a six-year period. It identifies specific funding sources and funding amounts for each project. The FTIP is prioritized to implement the region's overall strategy for providing mobility, improving the efficiency and safety of the transportation system, and supporting efforts to attain federal and state air quality standards by reducing transportation-related air pollution in the region. It must include all federally funded transportation projects in the region, as well as all regionally significant transportation projects requiring approval from federal funding agencies, regardless of funding source. The FTIP is developed incrementally to implement the programs and projects outlined in the RTP/SCS. The 2025 FTIP was adopted by SCAG in September 2024.²

The regular RTP and FTIP public update processes ensure that the identification and implementation of TCMs are routine considerations that assist SCAG in its efforts to support attainment of applicable National Ambient Air Quality Standards (NAAQS) in the Basin.

In the Basin, the following three categories of TCM projects and programs are identified and developed by the CTCs and included in SCAG's RTP/SCS and FTIP:

1. Transit and non-motorized modes;
2. High Occupancy Vehicle (HOV) Lanes and their pricing alternatives; and
3. Information-based Transportation Strategies (e.g., traffic signal synchronization).

In addition, Rule 2202 – On-Road Motor Vehicle Mitigation Options was adopted to reduce mobile source emissions generated from employee commute trips. Rule 2202 applies to larger employers in the region with more than 250 employees and requires these employers to implement one or more emission reduction options to reduce emissions from employee commute trips into their worksite. Rule 2202 is designed to reduce emissions of Volatile Organic Compounds (VOCs), Oxides of Nitrogen (NOx), and Carbon Monoxide (CO), by an equal or greater amount to that achievable through trip reduction. Rule 2202 provides employers with a menu of emission reduction options to implement and meet an Emission Reduction Target (ERT) for their worksite. The types of vehicles included in Rule 2202 emission calculations are passenger vehicles and light-duty vehicles (LT1 and LT2). Rule 2202 applies to approximately 1,250 worksites in the region consisting of about 670,000 peak window employees (starting work between 6:00-10:00am). Rule 2202 was amended in August 2023 to require additional data reporting, including reporting on telework policies and behaviors that may be different today than before the COVID-19 pandemic. This data will not be reported until 2025, and potential future amendments to Rule 2202 may be considered based on this data. Finally, Rule 2202 has

² <https://scag.ca.gov/2025-ftip>

not been approved into the SIP, and emission reductions associated with this rule are not SIP-creditable to the rule. Rule 2202 is therefore not a feasible measure for contingency.

As documented in Appendix IV-C of the South Coast AQMD's 2022 AQMP, which was adopted by the AQMD Governing Board in December 2022, it has been determined that the TCMs being implemented in the Basin encompass all TCM RACMs. None of the candidate measures reviewed, which have not been implemented, meet the criteria for RACM implementation. Appendix IV-C also includes a list of completed TCM projects and a list of TCM projects currently being implemented in the Basin.

TCMs are not suitable as contingency measures because they must be developed through the area's regional and county long-range transportation planning processes, which typically operate on a four-year cycle. Furthermore, TCMs are funded by various federal, state, and increasingly, local sources, each with their respective programming requirements. Therefore, considering the significant time required to advance these projects through the planning and funding processes, TCMs are not viable options as contingency measures.

**South Coast Air Basin Contingency Measure SIP Revision
for the 2015 8-Hour Ozone NAAQS Standard**

**APPENDIX D: EMISSION SOURCES AND APPLICABLE
RULES**

Table D-1

Applicable South Coast AQMD VOC Rules for EICs Contributing > 1% of 2037 Stationary Source Emissions in the South Coast Air Basin

| EIC | Source Category | Subcategory | Material | VOC (tpd) | VOC (%) | South Coast AQMD Applicable Rules | Location in Infeasibility Justification |
|--------------------|---------------------------------------|--|---------------------------------|-----------|---------|---|--|
| 120-122-0242-0000 | LANDFILLS | CLASS II AND III LANDFILLS | MUNICIPAL SOLID WASTE (MSW) | 9.63 | 3.87 | 1150.1 – Control of Gaseous Emissions from Municipal Solid Waste Landfills | Waste Disposal |
| 199- 170-0240-0116 | OTHER (WASTE DISPOSAL) | COMPOSTING | SOLID WASTE (UNSPECIFIED) | 6.40 | 2.57 | 1133.1 – Chipping and Grinding Activities, 1133.2 – Emission Reductions from Co-Composting Operations, 1133.3 – Emission Reductions from Greenwaste Composting Operations | Waste Disposal |
| 220-204-0500-0000 | DEGREASING | COLD CLEANING (BATCH - CONVEYOR - SPRAY GUN) | PETROLEUM NAPHTHA | 5.72 | 2.30 | 442 – Usage of Solvents, 1122 – Solvent Degreasers, 1171 – Solvent Cleaning Operations | Cleaning and Surface Coatings, Degreasing |
| 220-995-3000-0000 | DEGREASING | OTHER | ORGANIC CHEMICALS (UNSPECIFIED) | 2.52 | 1.01 | 443 – Usage of Solvents, 1122 – Solvent Degreasers, 1171 – Solvent Cleaning Operations | Cleaning and Surface Coating, Degreasing |
| 230-218-9000-0000 | COATINGS AND RELATED PROCESS SOLVENTS | AUTO REFINISHING | COATINGS (UNSPECIFIED) | 9.38 | 3.77 | 442 – Usage of Solvents, 1151 – Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations | Coatings and Related Processes, Motor Vehicle Non-Assembly Line Coating Operations |
| 230-230-9000-0000 | COATINGS AND RELATED PROCESS SOLVENTS | METAL PARTS AND PRODUCTS COATINGS | COATINGS (UNSPECIFIED) | 6.07 | 2.44 | 442 – Usage of Solvents, 1107 – Coating of Metal Parts and Products, 1125 – Metal Container, Closure, and Coil Coating Operations | Cleaning and Surface Coatings, Metal Products Coating Operations |

Appendix D: Emission Sources and Applicable Rules

| EIC | Source Category | Subcategory | Material | VOC (tpd) | VOC (%) | South Coast AQMD Applicable Rules | Location in Infeasibility Justification |
|-------------------|------------------------|--|--|-----------|---------|--|--|
| 250-292-8202-0000 | ADHESIVES AND SEALANTS | ADHESIVES AND SEALANTS | ORGANIC SOLVENT BASED ADHESIVES AND SEALANTS (UNSPECIFIED) | 3.48 | 1.40 | 442 – Usage of Solvents, 1168 – Adhesives and Sealant Applications | Adhesives and Sealants |
| 330-319-0120-0000 | PETROLEUM MARKETING | LPG TRANSFER AND DISPENSING LOSSES | LIQUIFIED PETROLEUM GAS (LPG) | 3.70 | 1.49 | 1177 – Liquefied Petroleum Gas Transfer and Dispensing | Petroleum Production and Marketing, LPG Transfer and Dispensing Losses |
| 330-395-1100-0000 | PETROLEUM MARKETING | CARGO TANKS - PRESSURE RELATED FUGITIVE LOSSES | GASOLINE (UNSPECIFIED) | 2.69 | 1.08 | Subject to CARB authority | Refer to Appendix B: CARB's Area Source Infeasibility Justification |
| 510-500-9060-0000 | CONSUMER PRODUCTS | AEROSOL COATINGS | NONFLAT COATINGS (UNSPECIFIED) | 3.10 | 1.24 | Subject to CARB authority | Refer to Appendix B: CARB's Area Source Infeasibility Justification |
| 510-506-6793-0000 | CONSUMER PRODUCTS | CONSUMER PRODUCTS | HAND SANITIZER | 9.05 | 3.64 | Subject to CARB authority | Refer to Appendix B: CARB's Area Source Infeasibility Justification |
| 510-506-6750-0000 | CONSUMER PRODUCTS | CONSUMER PRODUCTS | PERSONAL FRAGRANCE PRODUCT (FRAGRANCE <= 20%) | 8.34 | 3.35 | Subject to CARB authority | Refer to Appendix B: CARB's Area Source Infeasibility Justification |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| EIC | Source Category | Subcategory | Material | VOC (tpd) | VOC (%) | South Coast AQMD Applicable Rules | Location in Infeasibility Justification |
|-------------------|-------------------|-------------------|---|-----------|---------|-----------------------------------|---|
| 510-506-6760-0000 | CONSUMER PRODUCTS | CONSUMER PRODUCTS | HAIR SPRAY | 7.36 | 2.96 | Subject to CARB authority | Refer to Appendix B: CARB's Area Source Infeasibility Justification |
| 510-506-6906-0000 | CONSUMER PRODUCTS | CONSUMER PRODUCTS | OTHER PERSONAL CARE PRODUCTS | 7.02 | 2.82 | Subject to CARB authority | Refer to Appendix B: CARB's Area Source Infeasibility Justification |
| 510-506-6780-0000 | CONSUMER PRODUCTS | CONSUMER PRODUCTS | RUBBING ALCOHOL | 6.53 | 2.62 | Subject to CARB authority | Refer to Appendix B: CARB's Area Source Infeasibility Justification |
| 510-506-6580-0000 | CONSUMER PRODUCTS | CONSUMER PRODUCTS | MULTI-PURPOSE SOLVENTS AND PAINT THINNERS | 4.34 | 1.74 | Subject to CARB authority | Refer to Appendix B: CARB's Area Source Infeasibility Justification |
| 510-506-6590-0000 | CONSUMER PRODUCTS | CONSUMER PRODUCTS | DISINFECTANTS | 4.21 | 1.69 | Subject to CARB authority | Refer to Appendix B: CARB's Area Source Infeasibility Justification |
| 510-506-6652-0000 | CONSUMER PRODUCTS | CONSUMER PRODUCTS | GENERAL PURPOSE CLEANERS - NON-AEROSOLS | 4.01 | 1.61 | Subject to CARB authority | Refer to Appendix B: CARB's Area Source |

Appendix D: Emission Sources and Applicable Rules

| EIC | Source Category | Subcategory | Material | VOC (tpd) | VOC (%) | South Coast AQMD Applicable Rules | Location in Infeasibility Justification |
|-------------------|-------------------|-------------------|----------------------------------|-----------|---------|-----------------------------------|---|
| | | | | | | | Infeasibility Justification |
| 510-506-6790-0000 | CONSUMER PRODUCTS | CONSUMER PRODUCTS | LAUNDRY DETERGENT | 3.93 | 1.58 | Subject to CARB authority | Refer to Appendix B: CARB's Area Source Infeasibility Justification |
| 510-506-6741-0000 | CONSUMER PRODUCTS | CONSUMER PRODUCTS | HAND AND BODY LOTIONS | 3.98 | 1.60 | Subject to CARB authority | Refer to Appendix B: CARB's Area Source Infeasibility Justification |
| 510-506-6713-0000 | CONSUMER PRODUCTS | CONSUMER PRODUCTS | LIQUID/PUMP SPRAY AIR FRESHENERS | 2.58 | 1.04 | Subject to CARB authority | Refer to Appendix B: CARB's Area Source Infeasibility Justification |
| 510-506-6700-0000 | CONSUMER PRODUCTS | CONSUMER PRODUCTS | MULTI-PURPOSE LUBRICANT | 2.50 | 1.01 | Subject to CARB authority | Refer to Appendix B: CARB's Area Source Infeasibility Justification |
| 510-506-6742-0000 | CONSUMER PRODUCTS | CONSUMER PRODUCTS | SUN SCREEN/TANNING PRODUCTS | 2.88 | 1.16 | Subject to CARB authority | Refer to Appendix B: CARB's Area Source Infeasibility Justification |
| 510-506-6732-0000 | CONSUMER PRODUCTS | CONSUMER PRODUCTS | UNDERARM DEODORANTS | 2.67 | 1.07 | Subject to CARB authority | Refer to Appendix B: CARB's Area |

| EIC | Source Category | Subcategory | Material | VOC (tpd) | VOC (%) | South Coast AQMD Applicable Rules | Location in Infeasibility Justification |
|-----|-----------------|-------------|----------|-----------|---------|-----------------------------------|---|
| | | | | | | | Source Infeasibility Justification |

Table D-2

Applicable South Coast AQMD NOx Rules for EICs Contributing > 1% of 2037 Stationary Source Emissions in South Coast Air Basin

| EIC | Source Category | Subcategory | Material | NOx (tpd) | NOx (%) | South Coast AQMD Applicable Rules | Location in Infeasibility Justification |
|-------------------|-------------------------------------|----------------------------|----------------------------|-----------|---------|--|---|
| 010-005-0254-0000 | ELECTRIC UTILITIES | BOILERS | NATURAL GAS | 0.45 | 1.08 | 1135 – Emissions of Oxides of Nitrogen from Electricity Generating Facilities, 1146 – Emissions of Oxides of Nitrogen from Industrial, Institutional and Commercial Boilers, Steam Generators, and Process Heaters, 1146.1 – Emissions of Oxide of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters, 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters | Fuel Combustion- Boilers, Steam Generators, and Process Heaters |
| 010-045-0110-0000 | ELECTRIC UTILITIES | I.C. TURBINE ENGINES | NATURAL GAS | 1.50 | 3.62 | 1134 – Emissions of Oxides of Nitrogen from Stationary Gas Turbines, 1135 – Emissions of Oxides of Nitrogen from Electricity Generating Facilities | Fuel Combustion- Combustion Turbines |
| 030-040-0100-0000 | OIL AND GAS PRODUCTION (COMBUSTION) | I.C. RECIPROCATING ENGINES | GASEOUS FUEL (UNSPECIFIED) | 0.65 | 1.58 | 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines | Fuel Combustion- Reciprocating Internal Combustion Engines |
| 040-005-0130-0000 | PETROLEUM REFINING (COMBUSTION) | BOILERS | PROCESS GAS | 0.73 | 1.76 | 1109.1 – Emissions of Oxides of Nitrogen from Petroleum Refineries and Related Operations | Fuel Combustion- Boilers, Steam Generators, and Process Heaters |
| 040-010-0130-0000 | PETROLEUM REFINING (COMBUSTION) | PROCESS HEATERS | PROCESS GAS | 2.35 | 5.69 | 1109.1 – Emissions of Oxides of Nitrogen from Petroleum Refineries and Related Operations | Fuel Combustion- Boilers, Steam Generators, and Process Heaters |
| 050-005-0110-0000 | MANUFACTURING AND INDUSTRIAL | BOILERS | NATURAL GAS | 0.52 | 1.27 | 1146 – Emissions of Oxides of Nitrogen from Industrial, Institutional and Commercial Boilers, Steam Generators, and Process Heaters, 1146.1 – Emissions of Oxide of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters, 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters | Fuel Combustion- Boilers, Steam Generators, and Process Heaters |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| EIC | Source Category | Subcategory | Material | NOx (tpd) | NOx (%) | South Coast AQMD Applicable Rules | Location in Infeasibility Justification |
|-------------------|------------------------------|----------------------------|----------------------------|-----------|---------|--|--|
| 050-010-0110-0000 | MANUFACTURING AND INDUSTRIAL | PROCESS HEATERS | NATURAL GAS | 0.54 | 1.30 | 1146 – Emissions of Oxides of Nitrogen from Industrial, Institutional and Commercial Boilers, Steam Generators, and Process Heaters, 1146.1 – Emissions of Oxide of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters, 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters | Fuel Combustion- Boilers, Steam Generators, and Process Heaters |
| 050-040-0110-0000 | MANUFACTURING AND INDUSTRIAL | I.C. RECIPROCATING ENGINES | NATURAL GAS | 2.58 | 6.24 | 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines | Fuel Combustion- Reciprocating Internal Combustion Engines |
| 050-995-0110-0000 | MANUFACTURING AND INDUSTRIAL | OTHER | NATURAL GAS | 2.15 | 5.20 | 474 – Fuel Burning Equipment - Oxides of Nitrogen, 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines, 1146 – Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters, 1146.1 – Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters | Fuel Combustion- Incinerators, Reciprocating Internal Combustion Engines, Boilers, Steam Generators, and Process Heaters |
| 050-995-1500-0000 | MANUFACTURING AND INDUSTRIAL | OTHER | RESIDUAL OIL (UNSPECIFIED) | 0.73 | 1.76 | | |
| 060-005-0110-0000 | SERVICE AND COMMERCIAL | BOILERS | NATURAL GAS | 0.80 | 1.93 | 1135 – Emissions of Oxides of Nitrogen from Electricity Generating Facilities, 1146 – Emissions of Oxides of Nitrogen from Industrial, Institutional and Commercial Boilers, Steam Generators, and Process Heaters, 1146.1 – Emissions of Oxide of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters, 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters | Fuel Combustion- Boilers, Steam Generators, and Process Heaters |
| 060-030-0110-0000 | SERVICE AND COMMERCIAL | WATER HEATING | NATURAL GAS | 0.42 | 1.03 | 1121 – Control of Nitrogen Oxides from Residential Type, Natural-Gas-Fired Water Heaters, 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters | Fuel Combustion- Residential and Commercial Fuel Combustion |

Appendix D: Emission Sources and Applicable Rules

| EIC | Source Category | Subcategory | Material | NOx (tpd) | NOx (%) | South Coast AQMD Applicable Rules | Location in Infeasibility Justification |
|-------------------|-------------------------|----------------------------|-------------------------------------|-----------|---------|--|--|
| 060-040-0110-0000 | SERVICE AND COMMERCIAL | I.C. RECIPROCATING ENGINES | NATURAL GAS | 0.82 | 1.99 | 474 – Fuel Burning Equipment - Oxides of Nitrogen, 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines | Fuel Combustion- Reciprocating Internal Combustion Engines |
| 060-040-1200-0000 | SERVICE AND COMMERCIAL | I.C. RECIPROCATING ENGINES | DIESEL/DISTILLATE OIL (UNSPECIFIED) | 1.48 | 3.59 | | |
| 060-995-0120-0000 | SERVICE AND COMMERCIAL | OTHER | LIQUIFIED PETROLEUM GAS (LPG) | 0.57 | 1.37 | 474 – Fuel Burning Equipment - Oxides of Nitrogen, 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines, 1111 – Reduction of NOx Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces, 1146 – Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters, 1146.1 – Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters | Fuel Combustion - Boilers, Steam Generators, and Process Heaters, Residential and Commercial Fuel Combustion, Incinerators |
| 060-995-0110-0008 | SERVICE AND COMMERCIAL | OTHER | NATURAL GAS | 0.98 | 2.37 | | |
| 060-995-0110-0007 | SERVICE AND COMMERCIAL | OTHER | NATURAL GAS | 3.54 | 8.56 | | |
| 099-040-1200-0000 | OTHER (FUEL COMBUSTION) | I.C. RECIPROCATING ENGINES | DIESEL/DISTILLATE OIL (UNSPECIFIED) | 2.53 | 6.11 | 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines, 474 – Fuel Burning Equipment - Oxides of Nitrogen | Fuel Combustion - Reciprocating Internal Combustion Engines |
| 120-132-0136-0000 | LANDFILLS | FLARES | WASTE GAS | 0.42 | 1.01 | 1118.1 – Control of Emissions from Non-Refinery Flares | Petroleum Production and Marketing – Vapor Recovery/Flares |
| 130-130-0240-0000 | INCINERATORS | INCINERATION | SOLID WASTE (UNSPECIFIED) | 0.82 | 1.99 | 1165 – Control of Emissions from Municipal Solid Waste Incinerators | Waste Disposal |
| 320-358-0010-0000 | PETROLEUM REFINING | CATALYTIC CRACKING | HYDROCARBON COMPOUNDS (UNSPECIFIED) | 0.45 | 1.08 | 1109.1 – Emissions of Oxides of Nitrogen from Petroleum Refineries and Related Operations | Petroleum Production and Marketing - Other Refining-Related Operations |

South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

| EIC | Source Category | Subcategory | Material | NOx (tpd) | NOx (%) | South Coast AQMD Applicable Rules | Location in Infeasibility Justification |
|-------------------|-----------------------------|---------------------------------|-------------------------------|-----------|---------|---|--|
| 610-606-0110-0000 | RESIDENTIAL FUEL COMBUSTION | FUEL COMBUSTION - SPACE HEATING | NATURAL GAS | 2.01 | 4.86 | 1111 – Reduction of NOx Emissions from Natural-Gas-Fired, Fan-Type Central Furnaces | Fuel Combustion - Residential and Commercial Fuel Combustion |
| 610-608-0110-0000 | RESIDENTIAL FUEL COMBUSTION | FUEL COMBUSTION - WATER HEATING | NATURAL GAS | 1.78 | 4.31 | 1121 – Control of Nitrogen Oxides from Residential Type, Natural-Gas-Fired Water Heaters, 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters | Fuel Combustion - Residential and Commercial Fuel Combustion |
| 610-610-0110-0000 | RESIDENTIAL FUEL COMBUSTION | FUEL COMBUSTION - COOKING | NATURAL GAS | 1.21 | 2.94 | No applicable rule identified, but included in control measure R-CMB-03 in the 2022 AQMP | - |
| 610-995-0110-0000 | RESIDENTIAL FUEL COMBUSTION | OTHER (FUEL COMBUSTION) | NATURAL GAS | 2.68 | 6.47 | No applicable rule identified, but included in control measure R-CMB-04 in the 2022 AQMP | - |
| 610-995-0120-0000 | RESIDENTIAL FUEL COMBUSTION | OTHER | LIQUIFIED PETROLEUM GAS (LPG) | 1.61 | 3.90 | No applicable rule identified, but included in control measure R-CMB-04 in the 2022 AQMP | - |

ATTACHMENT C



**South Coast
Air Quality Management District**

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SUBJECT: NOTICE OF EXEMPTION FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

PROJECT TITLE: SOUTH COAST AIR BASIN CONTINGENCY MEASURE STATE IMPLEMENTATION PLAN (SIP) REVISION FOR THE 2015 8-HOUR OZONE NATIONAL AMBIENT AIR QUALITY STANDARD (NAAQS)

Pursuant to the California Environmental Quality Act (CEQA) Guidelines, the South Coast Air Quality Management District (South Coast AQMD), as Lead Agency, has prepared a Notice of Exemption pursuant to CEQA Guidelines Section 15062 – Notice of Exemption for the project identified above.

If the proposed project is approved, the Notice of Exemption will be filed for posting with the county clerks of Los Angeles, Orange, Riverside, and San Bernardino Counties. The Notice of Exemption will also be electronically filed with the State Clearinghouse of the Governor's Office of Land Use and Climate Innovation for posting on their CEQAnet Web Portal which may be accessed via the following weblink: <https://ceqanet.lci.ca.gov/Search/Recent>. In addition, the Notice of Exemption will be electronically posted on the South Coast AQMD's webpage which can be accessed via the following weblink: <http://www.aqmd.gov/nav/about/public-notices/ceqa-notices/notices-of-exemption/noe---year-2025>.

**NOTICE OF EXEMPTION FROM THE
CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)**

| | |
|---|---|
| To: County Clerks for the Counties of Los Angeles, Orange, Riverside, and San Bernardino; and Governor's Office of Land Use and Climate Innovation – State Clearinghouse | From: South Coast Air Quality Management District 21865 Copley Drive Diamond Bar, CA 91765 |
|---|---|

Project Title: South Coast Air Basin Contingency Measure State Implementation Plan (SIP) Revision for the 2015 8-Hour Ozone National Ambient Air Quality Standard (NAAQS)

Project Location: The proposed project is located within the four-county South Coast Air Basin portion of South Coast Air Quality Management District’s (South Coast AQMD) jurisdiction, which includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties.

Description of Nature, Purpose, and Beneficiaries of Project: The 2022 Air Quality Management Plan (AQMP) established a strategy for meeting the 2015 8-hour ozone standard, for which the South Coast Air Basin is classified as “extreme” nonattainment. The 2022 AQMP did not formally address the contingency measure requirements set forth in federal Clean Air Act (CAA) Sections 172(c)(9) and 182(c)(9) due to the absence of United States Environmental Protection Agency (U.S. EPA) guidance at the time of its adoption. In response to U.S. EPA’s contingency measures guidance that was finalized in December 2024, the South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS (South Coast Ozone Contingency SIP Revision) has been developed which includes: 1) contingency measures for stationary point and area sources; 2) a mobile source contingency measure; 3) a comparison of emission reductions to be achieved by contingency measures to the recommended amount of reductions specified in U.S. EPA’s guidance; and 4) a demonstration that there are no other feasible stationary and mobile source contingency measures beyond the aforementioned contingency measures for stationary point and area sources, and mobile sources. All four contingency measures included in the South Coast Ozone Contingency SIP Revision have been previously adopted by the South Coast AQMD and California Air Resources Board. Therefore, the South Coast Ozone Contingency SIP Revision is an administrative exercise to fulfill U.S. EPA requirements and will benefit stakeholders by having improved clarity when implementing the applicable requirements.

| | |
|--|--|
| Public Agency Approving Project: South Coast Air Quality Management District | Agency Carrying Out Project: South Coast Air Quality Management District |
|--|--|

Exempt Status:

CEQA Guidelines Section 15061(b)(3) – Common Sense Exemption

CEQA Guidelines Section 15308 – Actions by Regulatory Agencies for Protection of the Environment

Reasons why project is exempt: South Coast AQMD, as Lead Agency, has reviewed the proposed project (South Coast Ozone Contingency SIP Revision) pursuant to: 1) CEQA Guidelines Section 15002(k) – General Concepts, the three-step process for deciding which document to prepare for a project subject to CEQA; and 2) CEQA Guidelines Section 15061 – Review for Exemption, procedures for determining if a project is exempt from CEQA. No adverse environmental impacts are expected because the South Coast Ozone Contingency SIP Revision is comprised of an administrative update to meet federal CAA requirements without proposing new requirements that would result in additional physical modifications. Thus, it can be seen with certainty that there is no possibility that the proposed project may cause a significant adverse effect on the environment. Therefore, the proposed project is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3) – Common Sense Exemption. The proposed project is also categorically exempt because it is intended to further protect or enhance the environment pursuant to CEQA Guidelines Section 15308 – Actions by Regulatory Agencies for Protection of the Environment. Further, there is no substantial evidence indicating that any of the exceptions set forth in CEQA Guidelines Section 15300.2 – Exceptions apply to the proposed project.

Date When Project Will Be Considered for Approval (subject to change):

South Coast AQMD Governing Board Public Hearing: August 1, 2025

NOTICE OF EXEMPTION FROM CEQA (concluded)

| | | |
|---|--|---|
| CEQA Contact Person: Farzaneh Khalaj, Ph.D. | Phone Number: (909) 396-3022 | Email: fkhalaj@aqmd.gov |
| Proposed Project Contact Person: Eric Praske, Ph.D. | Phone Number: (909) 396-2948 | Email: epraske@aqmd.gov |

Date Received for Filing: _____ **Signature:** (Signed and Dated Upon Board Approval)
Kevin Ni
Program Supervisor, CEQA
Planning, Rule Development, and
Implementation



South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone NAAQS

South Coast AQMD
Governing Board

August 1, 2025

Outline



South Coast Air Basin Ozone Trend



2022 Air Quality Management Plan



Contingency Measure Requirements

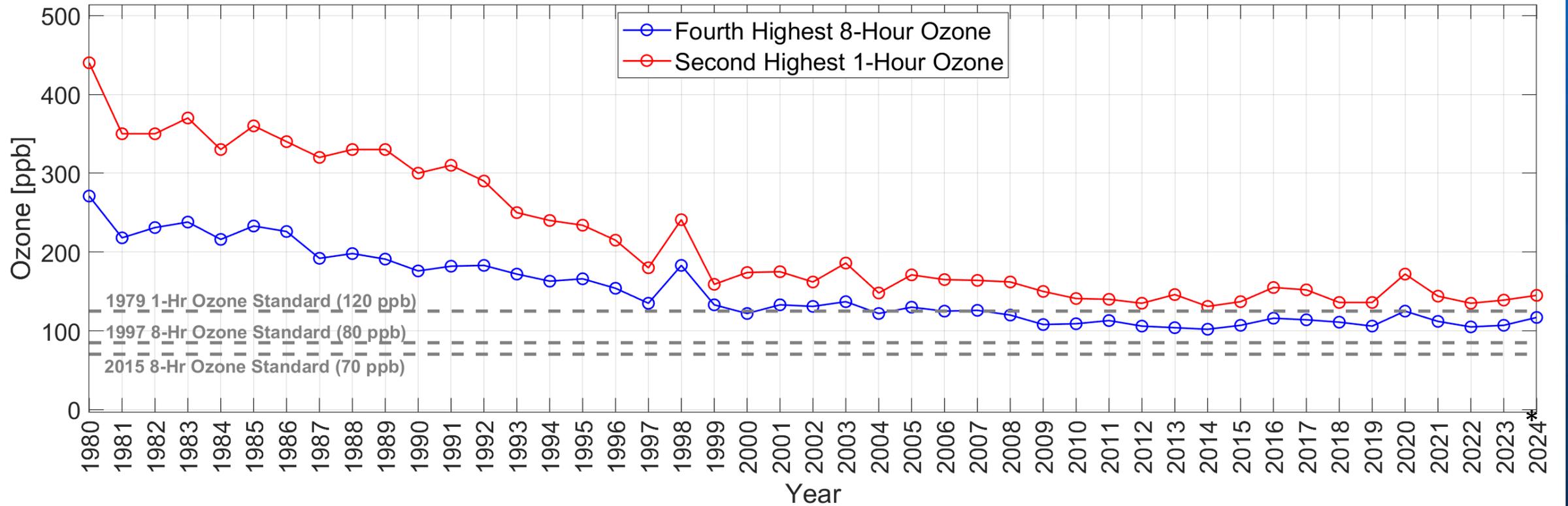


Contingency Measures Addressing the 2015 Ozone Standard



Public Comments and Staff Recommendation

South Coast Ozone Air Quality Progress



*2024 data are preliminary

South Coast Air Basin Ozone Attainment Status

| Standard | Level | South Coast Air Basin Classification | Attainment Year |
|-------------------|---------|--------------------------------------|-----------------|
| 2015 8-hour Ozone | 70 ppb | Extreme | 2037 |
| 2008 8-hour Ozone | 75 ppb | Extreme | 2031 |
| 1997 8-hour Ozone | 80 ppb | Extreme | 2023 |
| 1979 1-hour Ozone | 120 ppb | Extreme | 2022 |

The 2022 AQMP Overview

Purpose

Provides the strategy to meet the 2015 ozone standard in 2037

Development

Developed with input from advisory groups, agency partners, community, industry, and commerce groups

Adoption

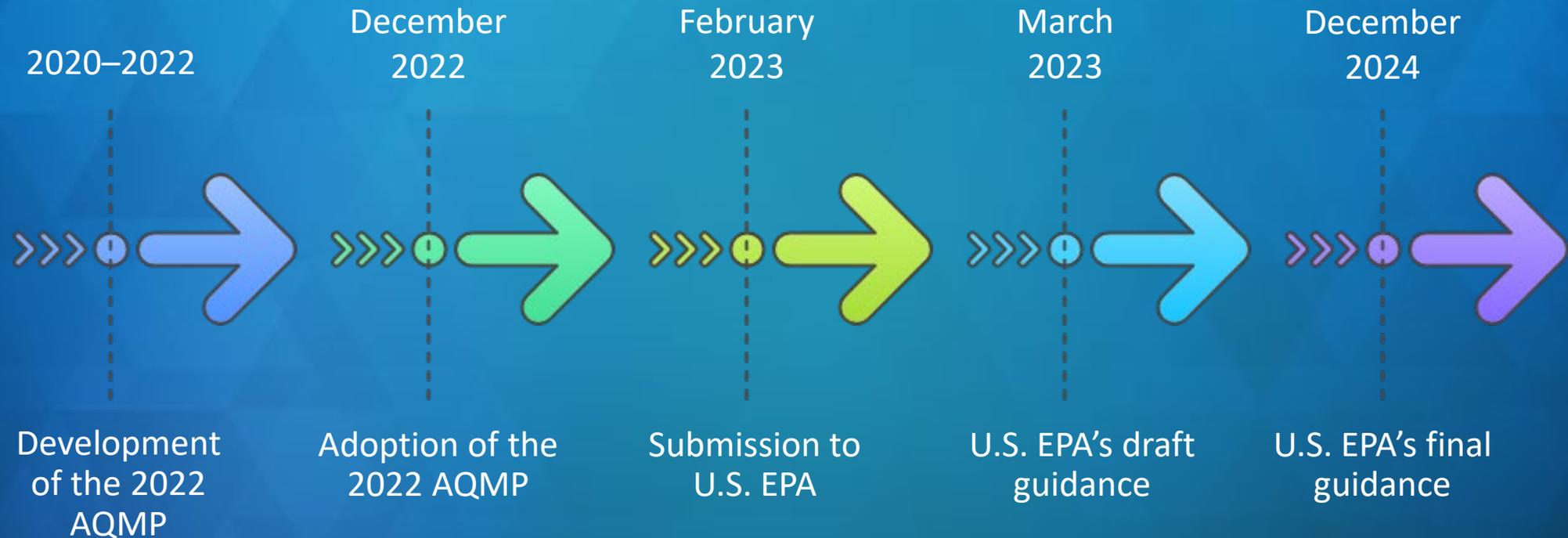
Adopted in December 2022 and submitted to U.S. EPA in February 2023

Implementation

South Coast is implementing the 2022 AQMP commitments including Rules 1110.2, 1135, 1146.2, 1153.1, 1165, 1173, 1179.1, etc.



The 2022 AQMP and Contingency Measure Guidance Timeline



The 2022 AQMP did not formally address contingency measures due to the lack of U.S. EPA's guidance, but committed to address them as soon as the guidance became available

Contingency Measures

Additional measures to reduce emissions that will be implemented if an area:

Fails to meet a standard by the required date

Fails to meet a major milestone (e.g., reasonable further progress requirements)

These must be in addition to already existing requirements

In theory, contingency measures are designed to get a nonattainment area back on the path of attainment; in practice, areas like South Coast have already adopted all feasible measures so there are little to no extra emission reductions available

Requirements for Contingency Measures

Triggering Mechanism

- Contingency measures must be adopted as rules that contain automatic triggering mechanisms

Implementation Timeline

- Measures must take effect within 60 days of triggering
- Emission reductions must occur within two years of triggering

Emission Reductions

- The quantity of reductions that contingency measures must achieve is one year's worth of progress

Existing Contingency Measures



Rule 445

Residential wood
burning
curtailment



Rule 463

Leak detection and
repair chemical
storage tanks



Rule 1173

Leak detection and
repair at refineries



Smog Check
Contingency
Measure

South Coast AQMD

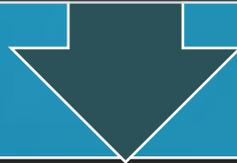
CARB

These measures are included as part of the South Coast Air Basin Contingency Measure SIP
Revision for the 2015 8-Hour Ozone NAAQS

One Year's Worth of Progress

U.S. EPA recommends that contingency measures achieve reductions equivalent to one year's worth of progress

In the Basin, one year's worth of progress is 2.63 tpd NO_x and 3.52 tpd VOC



Adopted contingency measures achieve 0.25 tpd of NO_x and 0.16 tpd of VOC reductions



Because the adopted measures achieve less than the recommended quantity of reductions, a robust justification is needed to demonstrate that no other feasible contingency measures exist

Scarcity of Feasible Contingency Measures

- Staff conducted a four-step process to demonstrate that all feasible opportunities for contingency measures are exhausted



Potential measures were deemed infeasible due to limitations in technology-readiness, cost-effectiveness, or ability to reformulate products or retrofit control technology within implementation timeframe for contingency measures

Public Process



April 18,
2025

- Mobile Source Committee

April 24,
2025

- Released Draft Staff Report

May 20,
2025

- Public Consultation Meeting

May 30,
2025

- Written Comment Deadline

August 1,
2025

- Governing Board Hearing

Summer
2025

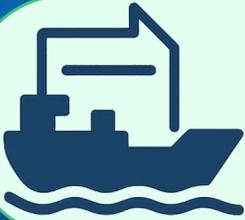
- Submission to U.S. EPA via CARB

Stakeholder Feedback



Mandate Zero Emission Appliances/Equipment

- ZE appliances and equipment are being pursued through rules and incentives



Adopt Stringent Ports ISR

- Staff is actively pursuing a measure on ports through a public process



Projects subject to General Conformity

- 2022 AQMP commits to seek new approaches such as mitigation and offset of the emissions



Implement "Shelved" Measures from the 2016 and 2022 AQMPs

- A few remaining measures from 2016 AQMP (e.g., NO_x reductions from restaurant burners and residential cooking devices) are being implemented as part of 2022 AQMP

Proposed measures are incompatible with contingency requirements

- *Long timelines needed for implementation, and/or*
- *Measures already relied on for attainment*

Staff Recommendation

Adopt the Resolution:

- Determining that the South Coast Ozone Contingency SIP Revision is exempt from the requirements of CEQA.
- Adopting the South Coast Ozone Contingency SIP Revision and directing staff to forward the South Coast Ozone Contingency SIP Revision to CARB for approval and submission to U.S. EPA for inclusion in the SIP.

[↑ Back to Agenda](#)

BOARD MEETING DATE: August 1, 2025

AGENDA NO. 26

PROPOSAL: Determine That Proposed Amended Rule 462 – Organic Liquid Loading, Is Exempt from CEQA; Amend Rule 462; and Submit Rule 462 Into State Implementation Plan

SYNOPSIS: Rule 462 controls VOC emissions during the loading of organic liquids into transport vessels. Proposed Amended Rule 462 (PAR 462) will further reduce VOC emissions by requiring enhanced leak detection using optical gas imaging and reducing the VOC limit for vapor control systems. Additionally, PAR 462 will introduce a contingency measure to fulfill Clean Air Act requirements.

COMMITTEE: Stationary Source, May 16, 2025, Reviewed

RECOMMENDED ACTIONS:

Adopt the attached Resolution:

1. Determining that Proposed Amended Rule 462 – Organic Liquid Loading, is exempt from the requirements of the California Environmental Quality Act;
2. Amending Rule 462 – Organic Liquid Loading; and
3. Directing staff to submit Proposed Amended Rule 462 – Organic Liquid Loading for inclusion into the State Implementation Plan.

Wayne Natri
Executive Officer

Background

Rule 462 was adopted on January 9, 1976 to control volatile organic compound (VOC) emissions from bulk terminals and marine terminals that load organic liquids like gasoline and ethanol into tank trucks, trailers, or railroad tank cars. Rule 462 currently applies to approximately 53 bulk loading facilities, including Class A facilities with throughputs of 20,000 gallons of organic liquids or more per day, and Class B facilities that load no more than 20,000 gallons of gasoline per day. Rule 462 has been amended six times to reduce the VOC emission limit for vapor control systems and address a vapor leak measurement issue. Vapor leaks from the equipment at these facilities are primarily monitored with the use of analyzers on a quarterly basis.

The 2022 AQMP includes control measures designed to achieve attainment of the ozone National Ambient Air Quality Standards (NAAQS). Control Measure FUG-01: Improved Leak Detection and Repair (LDAR) proposes to implement the use of advanced LDAR technologies including optical gas imaging (OGI) devices for earlier detection of VOC emissions from leaks. Rule development was initiated in response to the AB 617 community of Wilmington, Carson, West Long Beach (WCWLB) Community Emission Reduction Plan (CERP) objective to address fugitive emissions from petroleum facilities. The 2022 AQMP also committed to include contingency measures in rulemaking to partially satisfy federal Clean Air Act (CAA) contingency requirements for applicable ozone NAAQS in the South Coast AQMD's jurisdiction.

Proposal

Proposed Amended Rule 462 (PAR 462) further reduces VOC emissions from organic liquid loading by requiring OGI inspections monthly at Class A and B facilities. PAR 462 also lowers the VOC emission limit for vapor control systems at Class A facilities and requires source tests on the vapor control systems every 60 months. Additionally, PAR 462 introduces a contingency measure to be implemented, if triggered, that would increase OGI inspections to every two weeks. This contingency measure will be triggered if South Coast AQMD fails to make reasonable further progress or attain the 2008 or 2015 ozone NAAQS standard in the Coachella Valley area. The contingency measure affects all Class A and B facilities throughout the South Coast AQMD region due to emissions from those facilities impacting the Coachella Valley area.

Public Process

The development of PAR 462 was conducted through a public process. Two Working Group Meetings were held on November 6, 2024, and March 5, 2025. The Working Groups included representatives from the community, environmental organizations, industry representatives, and government agencies. Staff also met individually with industry stakeholders and visited sites affected by the proposed amended rule. A Public Workshop was held on April 2, 2025, where staff presented the proposed amended rule to the general public and stakeholders, and solicited comments.

Emission Reductions

PAR 462 is expected to reduce VOC emissions by approximately 0.34 ton per day by 2026.

Key Issues

Through the rulemaking process, staff has worked with stakeholders to address and resolve issues. Issues that were raised included meeting the reduced 0.04 pounds VOC per thousand gallons with a 15-minute averaging time, and residual liquid remaining in couplers after disconnection from loading operations. Staff is not aware of any remaining key issues.

California Environmental Quality Act

Pursuant to the CEQA Guidelines sections 15002(k) and 15061, PAR 462 is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3). A Notice of Exemption has been prepared pursuant to CEQA Guidelines section 15062 and is included as Attachment H to this Board letter. If the proposed project is approved, the Notice of Exemption will be filed for posting with the county clerks of Los Angeles, Orange, Riverside, and San Bernardino counties, and with the State Clearinghouse of the Governor's Office of Land Use and Climate Innovation.

Socioeconomic Impact Assessment

Approximately 53 facilities are subject to PAR 462, the majority of which operate within the Wholesale Trade Sector under the North American Industrial Classification System (NAICS 42). Of these, 26 are located in Los Angeles County, 13 in San Bernardino County, seven in Riverside County, and seven in Orange County. Based on various definitions, up to nine of these facilities may qualify as small businesses. The key requirements of PAR 462 that would have cost impacts for the affected facilities include: 1) monthly OGI inspections; 2) updating Title V facility and equipment permits early to incorporate lowered VOC limits for vapor control systems; and 3) source testing every 60 months. The total present value of the compliance costs of PAR 462 are estimated to be \$6.35 million and \$5.43 million with a 1 percent and 4 percent discount rate, respectively. The average annual compliance cost of PAR 462 is estimated to range from \$627,109 to \$671,262, based on a real interest rate of 1 percent to 4 percent, respectively. Since this cost is well below the \$1 million threshold, a macroeconomic impact analysis was not conducted. The details of the Final Socioeconomic Impact Assessment can be found within the Final Staff Report (Attachment G of this Board Letter).

AQMP and Legal Mandates

Under Health and Safety Code section 40460(a), the South Coast AQMD is required to adopt an AQMP demonstrating compliance with all federal regulations and standards. PAR 462 partially implements the 2022 AQMP Control Measure FUG-01: Improved

Leak Detection and Repair by requiring monthly monitoring of components of transfer equipment with the use of OGI technology.

In addition, PAR 462 introduces a contingency measure to partially satisfy federal CAA Section 182(c)(9) that requires that ozone nonattainment areas classified as “serious” or above provide for contingency measures to be implemented if the area fails to meet any applicable milestone.

Implementation and Resource Impact

Existing staff resources are adequate to implement the proposed amended rule.

Attachments

- A. Summary of Proposal
- B. Key Issues and Responses
- C. Rule Development Process
- D. Key Contacts List
- E. Resolution
- F. Proposed Amended Rule 462
- G. Final Staff Report (including Final Socioeconomic Impact Assessment)
- H. Notice of Exemption from CEQA
- I. Board Meeting Presentation

ATTACHMENT A

SUMMARY OF PROPOSAL

Proposed Amended Rule 462 – Organic Liquid Loading

Applicability

- Applicability moved from subdivision (c) to subdivision (b) to align with current South Coast AQMD rule structure conventions

Definitions

- New definitions for Contingency Measure, Coupler, Inaccessible Component, Optical Gas Imaging Device, Residual Liquid, True Vapor Pressure, and Visible Vapors

Emission Limits

- VOC emission limit for air pollution control devices at Class A facilities lowered from 0.08 pounds VOC per thousand gallons to 0.04 pounds VOC per thousand gallons

Inspection Requirements

- Effective August 1, 2026, Class A and B facilities required to conduct monthly optical gas imaging (OGI) inspections of organic liquid loading equipment

Compliance Determination/Test Methods

- Class A facilities required to source test air pollution control devices every five years

Ozone Contingency Measure

- Within 60 days of finding of nonattainment or failure of reasonable further progress, OGI inspection frequency for Class A and B facilities increased to every two weeks

Exemptions

- OGI inspection requirements not applicable at Class C facilities
- Facilities subject to Rule 462 are not subject to Rules 466 and 466.1
- Leak inspection requirements not applicable to equipment subject to Rule 1173

ATTACHMENT B

KEY ISSUES AND RESPONSES

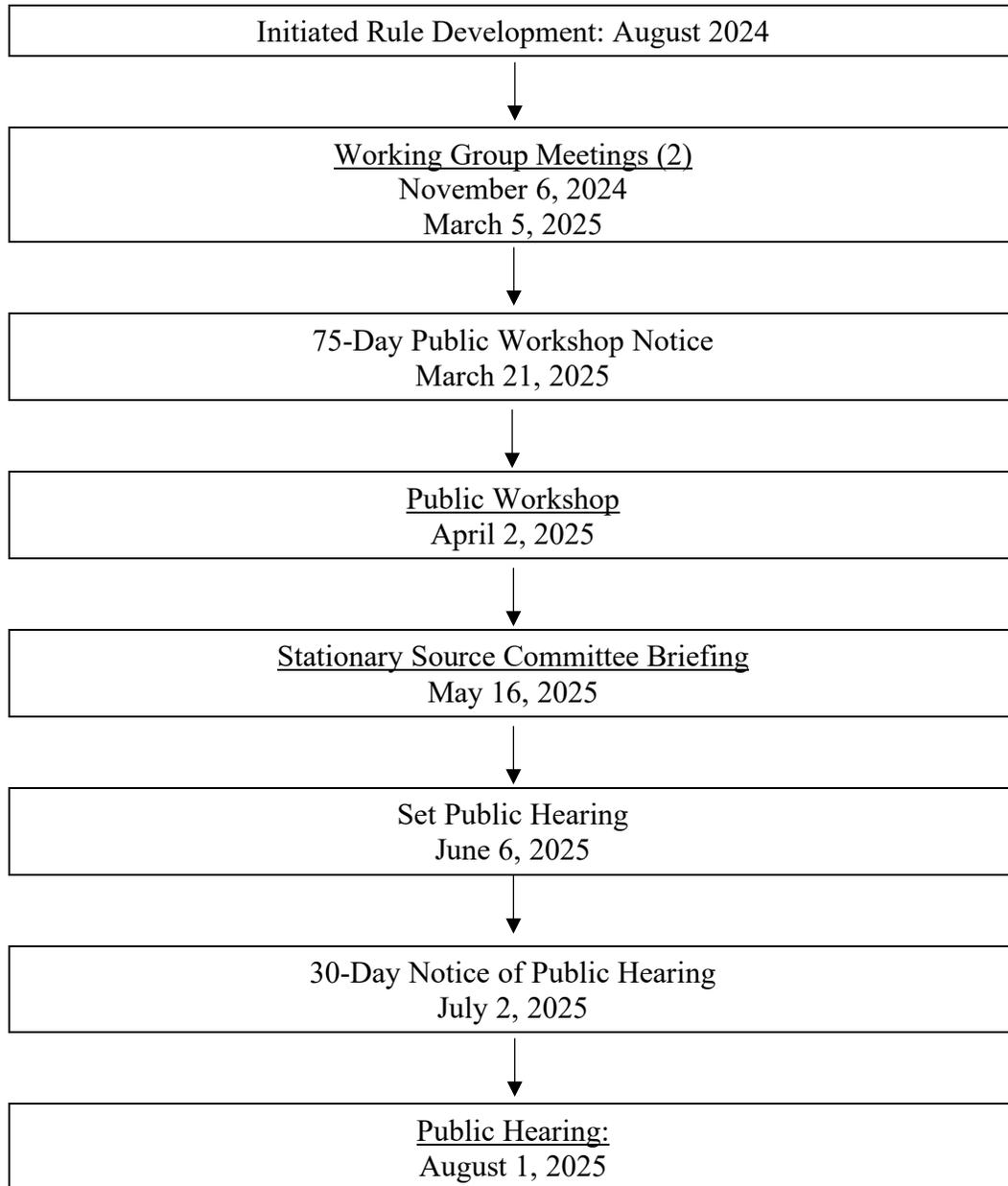
Proposed Amended Rule 462 – Organic Liquid Loading

Through the rulemaking process, staff worked with stakeholders to resolve key issues. Issues that were raised included meeting the reduced 0.04 pounds VOC per thousand gallons with a 15-minute averaging time, and residual liquid remaining on couplers after disconnection from loading operations. Staff is not aware of any remaining key issues.

ATTACHMENT C

RULE DEVELOPMENT PROCESS

Proposed Amended Rule 462 – Organic Liquid Loading



Twelve (12) months spent in rule development
One (1) Public Workshop
One (1) Stationary Source Committee Meeting
Two (2) Working Group Meetings

ATTACHMENT D

KEY CONTACTS LIST

Proposed Amended Rule 462 – ORGANIC LIQUID LOADING

- Chemoil/Olympus Terminals
- Chevron
- Disneyland Resort
- Equilon/Shell Oil
- Kinder Morgan
- Konica Minolta
- Marathon/Tesoro
- PBF Energy
- Petro Diamond Terminal
- Phillips 66
- Southern California Edison
- Teledyne FLIR
- Valero
- Western States Petroleum Association (WSPA)
- World Oil

ATTACHMENT E

RESOLUTION NO. 25-____

A Resolution of the Governing Board of the South Coast Air Quality Management District (South Coast AQMD) determining that Proposed Amended Rule 462 – Organic Liquid Loading, is exempt from the requirements of the California Environmental Quality Act (CEQA).

A Resolution of the South Coast AQMD Governing Board amending Rule 462 – Organic Liquid Loading.

A Resolution of the South Coast AQMD Governing Board directing staff to submit Proposed Amended Rule 462 – Organic Liquid Loading for inclusion into State Implementation Plan.

WHEREAS, the South Coast AQMD Governing Board finds and determines that Proposed Amended Rule 462 is considered a “project” as defined by CEQA; and

WHEREAS, the South Coast AQMD has had its regulatory program certified pursuant to Public Resources Code Section 21080.5 and CEQA Guidelines Section 15251(l) and has conducted a CEQA review and analysis of Proposed Amended Rule 462 pursuant to such program (South Coast AQMD Rule 110); and

WHEREAS, the South Coast AQMD Governing Board finds and determines that after conducting a review of the proposed project in accordance with CEQA Guidelines Section 15002(k) – General Concepts, the three-step process for deciding which document to prepare for a project subject to CEQA, and CEQA Guidelines Section 15061 – Review for Exemption, procedures for determining if a project is exempt from CEQA, that Proposed Amended Rule 462 is exempt from CEQA; and

WHEREAS, the South Coast AQMD Governing Board finds and determines that, since Proposed Amended Rule 462 will achieve VOC emission reductions through more stringent VOC limits and by requiring frequent optical gas imaging inspections, which can be accomplished without physical modifications, it can be seen with certainty that implementation of Proposed Amended Rule 462 would not cause a significant adverse effect on the environment; therefore, the proposed project is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3) – Common Sense Exemption; and

WHEREAS, the South Coast AQMD staff has prepared a Notice of Exemption for the proposed project, that is completed in compliance with CEQA Guidelines Section 15062 – Notice of Exemption; and

WHEREAS, the South Coast AQMD Governing Board has determined that the Final Socioeconomic Impact Assessment of Proposed Amended Rule 462, as presented in the Final Staff Report, is consistent with the March 17, 1989 Governing Board Socioeconomic Resolution for rule amendment; and

WHEREAS, the South Coast AQMD Governing Board has determined that the Final Socioeconomic Impact Assessment of Proposed Amended Rule 462, as presented in the Final Staff Report, is consistent with the provisions of Health and Safety Code Sections 40440.8, 40728.5, and 40920.6; and

WHEREAS, the South Coast AQMD Governing Board has determined that Proposed Amended Rule 462 will result in increased costs to the affected industries, yet such costs are considered to be reasonable, with a total annualized cost as specified in the Final Socioeconomic Impact Assessment, as presented in the Final Staff Report; and

WHEREAS, the South Coast AQMD Governing Board has actively considered the Final Socioeconomic Impact Assessment for Proposed Amended Rule 462, as presented in the Final Staff Report, and has made a good faith effort to minimize such adverse impacts; and

WHEREAS, the South Coast AQMD staff conducted a Public Workshop on April 2, 2025, regarding Proposed Amended Rule 462; and

WHEREAS, Proposed Amended Rule 462 and supporting documentation, including but not limited to, the Notice of Exemption and Final Staff Report, which includes the Final Socioeconomic Impact Assessment, were presented to the South Coast AQMD Governing Board and the South Coast AQMD Governing Board has reviewed and considered this information, as well as has taken and considered staff testimony and public comment prior to approving the project; and

WHEREAS, the South Coast AQMD Governing Board finds and determines, taking into consideration the factors in Section (d)(4)(D) of the Governing Board Procedures (codified as Section 30.5(4)(D)(i) of the Administrative Code), that modifications to Proposed Amended Rule 462 since the Notice of Public Hearing was published, including the change to paragraph (b)(2) to clarify contingency measure approval criteria, the change to subparagraph (d)(1)(D) to clarify the effective date for the lower VOC limit, the addition to subparagraph (d)(7)(C) to clarify alternative inspection method approval, the change to subparagraph (e)(1)(D) to clarify the submittal deadline for new or modified continuous monitoring system plans, and the change to paragraph (i)(2) to clarify contingency measure applicability, are not so substantial as to significantly affect the meaning of Proposed Amended Rule 462 within the meaning of Health and Safety Code Section 40726 because: (a) the changes do not impact emission reductions, (b) the changes do not affect the number or type of sources regulated by the rule, (c) the changes are consistent with the information contained in the Notice of Public Hearing, and (d) the consideration of the range of CEQA alternatives is not applicable because the proposed project is exempt from CEQA; and

WHEREAS, Proposed Amended Rule 462 will be submitted to California Air Resources Board (CARB) and United States Environmental Protection Agency (U.S. EPA) for inclusion into the State Implementation Plan; and

WHEREAS, Health and Safety Code Section 40727 requires that prior to adopting, amending, or repealing a rule or regulation, the South Coast AQMD Governing Board shall make findings of necessity, authority, clarity, consistency, non-duplication, and reference based on relevant information presented at the public hearing and in the Final Staff Report; and

WHEREAS, the South Coast AQMD Governing Board has determined that a need exists to amend Rule 462 to partially implement Control Measure FUG-01 of the 2022 Final Air Quality Management Plan, and partially satisfy federal Clean Air Act Section 182(c)(9) contingency measure requirements for ozone nonattainment areas classified as “serious” or above; and

WHEREAS, the South Coast AQMD Governing Board has determined, pursuant to Health and Safety Code Section 40001(c), that there is a problem that Proposed Amended Rule 462 will alleviate, namely the failure to attain national ambient air quality standards for ozone, and that the rule will promote the attainment of state and federal ambient air quality standards; and

WHEREAS, the South Coast AQMD Governing Board obtains its authority to adopt, amend, or repeal rules and regulations from Health and Safety Code Sections 39002, 39650 et. seq., 40000, 40001, 40440, 40441, 40702, 40725 through 40728.5, 40920.6, and 41508; and

WHEREAS, the South Coast AQMD Governing Board has determined that Proposed Amended Rule 462 is written and displayed so that its meaning can be easily understood by persons directly affected by it; and

WHEREAS, the South Coast AQMD Governing Board has determined that Proposed Amended Rule 462 is in harmony with, and not in conflict with or contradictory to, existing statutes, court decisions, or state or federal regulations; and

WHEREAS, the South Coast AQMD Governing Board has determined that Proposed Amended Rule 462 does not impose the same requirements as any existing state or federal regulations, and the proposed amended rule is necessary and proper to execute the powers and duties granted to, and imposed upon, the South Coast AQMD; and

WHEREAS, the South Coast AQMD Governing Board, in amending Rule 462, references the following statutes which the South Coast AQMD hereby implements, interprets or makes specific: Health and Safety Code Sections 39002, 40001, 40406, 40702, 40440(a), 40725 through 40728.5, 40920.6, and 41511; and

WHEREAS, Health and Safety Code Section 40727.2 requires the South Coast AQMD to prepare a written analysis of existing federal air pollution control requirements applicable to the same source type being regulated whenever it adopts, or

amends a rule, and the South Coast AQMD's comparative analysis of Proposed Amended Rule 462 is included in the Final Staff Report; and

WHEREAS, the Public Hearing has been properly noticed in accordance with all provisions of Health and Safety Code Sections 40725 and 40440.5; and

WHEREAS, the South Coast AQMD Governing Board has held a Public Hearing in accordance with all provisions of law; and

WHEREAS, the South Coast AQMD Governing Board specifies the Planning, Rule Development, and Implementation Manager overseeing the rule development for Proposed Amended Rule 462 as the custodian of the documents or other materials which constitute the record of proceedings upon which the adoption of this proposed project is based, which are located at the South Coast Air Quality Management District, 21865 Copley Drive, Diamond Bar, California; and

NOW, THEREFORE BE IT RESOLVED, that the South Coast AQMD Governing Board does hereby determine, pursuant to the authority granted by law, that Proposed Amended Rule 462 is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3) – Common Sense Exemption. This information has been presented to the South Coast AQMD Governing Board, whose members exercised their independent judgment and reviewed, considered, and approved the information therein prior to acting on Proposed Amended Rule 462; and

BE IT FURTHER RESOLVED, that the South Coast AQMD Governing Board does hereby adopt, pursuant to the authority granted by law, Proposed Amended Rule 462 as set forth in the attached, and incorporated herein by reference; and

BE IT FURTHER RESOLVED, that the South Coast AQMD Governing Board requests that Proposed Amended Rule 462 be submitted for inclusion in the State Implementation Plan; and

BE IT FURTHER RESOLVED, that the Executive Officer is hereby directed to forward a copy of this Resolution and Proposed Amended Rule 462 and supporting documentation to CARB for approval and subsequent submittal to the U.S. EPA for inclusion into the State Implementation Plan.

DATE: _____

CLERK OF THE BOARDS

PROPOSED AMENDED RULE 462:

ORGANIC LIQUID LOADING

[Rule index to be added after Amendment]

(a) Purpose

This rule is intended to control emissions of ~~v~~Volatile ~~o~~Organic ~~e~~Compounds (VOC) from ~~f~~Facilities that load ~~o~~Organic ~~l~~Liquids with a True ~~v~~Vapor ~~p~~Pressure of 1.5 psia (77.5 mm Hg) or greater under actual loading conditions into any tank truck, trailer, or railroad tank car and establish Contingency Measures for applicable ozone standards for the reduction of VOC.

(b) Applicability

(1) The provisions of this rule shall apply to all the Organic Liquid loading Facilities that are defined as Class A, B, or C Facilities pursuant to paragraphs (c)(2), (c)(3) and (c)(4), respectively, of this rule.

(2) Subdivision (i) shall not become applicable until the effective date of ~~final and full approval of subdivision (i) by the United States Environmental Protection Agency (U.S. EPA) of the California State Implementation Plan as meeting the Contingency Measure requirements of the Clean Air Act Sections 172(c)(9) and 182(c)(9) for the Coachella Valley area regarding the 2008 and 2015 ozone National Ambient Air Quality Standards (NAAQS).~~

~~(b)~~(c) Definitions

For the purpose of this rule, the following definitions shall apply:

(1) BACKGROUND is the ambient concentration of organic vapors in the air measured according to the U.S. EPA Method 21 ~~subsection 4.3.2.~~

(2) CLASS "A" FACILITY is any ~~f~~Facility which loads 20,000 gallons (75,700 liters) or more on any one day of ~~o~~Organic ~~l~~Liquids into any tank truck, trailer, or railroad tank car.

(3) CLASS "B" FACILITY is any ~~f~~Facility:

(A) which was constructed before January 9, 1976 and loads more than 4,000 gallons (15,140 liters) but not more than 20,000 gallons (75,700 liters) of ~~g~~Gasoline on any one day into any tank truck, trailer, or railroad tank car.

(B) which was constructed before January 9, 1976 and loads not more than 4,000 gallons (15,140 liters) of ~~g~~Gasoline on any one day, but more than

- 500,000 gallons (1,892,500 liters) of gGasoline in any one calendar year, into any tank truck, trailer, or railroad tank car.
- (C) which was constructed after January 9, 1976 and loads not more than 20,000 gallons (75,700 liters) of gGasoline on any one day into a tank truck, trailer or railroad tank car.
- (4) CLASS "C" FACILITY is any fFacility existing before January 9, 1976 which loads not more than 4,000 gallons (15,140 liters) of gGasoline on any one day and not more than 500,000 gallons in any one calendar year, into any tank truck, trailer, or railroad tank car.
- (5) CONTINGENCY MEASURE is a control strategy to further reduce VOC emissions if the Coachella Valley area fails to comply with the requirements specified in Clean Air Act, Sections 172(c)(9) and 182(c)(9) regarding the 2008 and 2015 ozone NAAQS. These requirements are making reasonable further progress, attaining the applicable ozone NAAQS by a specified attainment date, and meeting any applicable milestones.
- (6) COUPLER is a component of Transfer Equipment at the interface between the end of the liquid loading line and the loading vessel.
- ~~(5)~~(7) EXEMPT COMPOUNDS are as defined in Rule 102 – Definition of Terms (Rule 102).
- ~~(6)~~(8) FACILITY is ~~an organic liquid or gasoline loading rack or set of such racks that load organic liquid or gasoline into tanks, trailers or railroad cars, which are located on one or more contiguous properties within the District, in actual physical contact or separated solely by a public roadway or other public right of way, and are owned or operated by the same person or persons under common control~~ as defined in Rule 1302 – Definitions.
- ~~(7)~~(9) FACILITY VAPOR LEAK is an escape of organic vapors from a source other than a tank truck, trailer or railroad tank car in excess of 3,000 ppm as methane above background when measured according to U.S. EPA Method 21. A ~~f~~Facility ~~v~~Vapor ~~h~~H leak source does not include liquid spillage or condensate resulting from "~~l~~Liquid ~~h~~H leaks".
- ~~(8)~~(10) GASOLINE is any petroleum distillate or petroleum distillate/alcohol blend or alcohol, except any liquefied petroleum gas (LPG), which has a True ~~v~~Vapor ~~p~~Pressure of 1.5 psia (77.5 mm Hg) or greater under actual loading conditions and is used as a fuel for internal combustion engines.
- (11) INACCESSIBLE COMPONENT is a component of Transfer Equipment located over five (5) meters above ground when access is required from the ground; or

located over two (2) meters away from a platform when access is required from the platform; or located at a position which would require the elevation of a monitoring personnel higher than two (2) meters above permanent support surfaces.

~~(9)~~(12) LIQUID LEAK is a dripping of liquid organic compounds at a rate in excess of three drops per minute from any single leak source other than the liquid fill line and vapor line of disconnect operations.

~~(10)~~(13) LIQUID LEAK FROM DISCONNECT OPERATIONS is defined as: (a) more than two milliliters of liquid drainage per disconnect from a top loading operation; or (b) more than ten milliliters of liquid drainage per disconnect from a bottom loading operation. Such liquid drainage shall be determined by computing the average drainage from three consecutive disconnects at any one loading arm.

(134) OPTICAL GAS IMAGING (OGI) DEVICE is an infrared camera with a detector capable of visualizing gases in the 3.2-3.4 micrometer waveband.

~~(11)~~(15) ORGANIC LIQUID is any liquid compound containing the element carbon that has a True ~~+~~Vapor ~~p~~Pressure of 1.5 psia (77.5 mm Hg) or greater under actual loading conditions excluding liquefied petroleum gases (LPG), methane, carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, ammonium carbonate, and ~~e~~Exempt ~~e~~Compounds.

(156) RESIDUAL LIQUID is Organic Liquid remaining in the Coupler after disconnection.

~~(12)~~(17) SUBMERGED FILL LOADING is a type of ~~o~~Organic ~~H~~Liquid loading operations where the discharge opening is completely submerged when the liquid level above the bottom of the vessel is eight centimeters (3.2 inches) or higher.

~~(13)~~(18) SWITCH LOADING is a transfer of ~~o~~Organic ~~H~~Liquids with a True ~~+~~Vapor ~~p~~Pressure of less than 1.5 psia (77.5 mm Hg) under actual loading condition into any tank truck, trailer or railroad tank car that was loaded with an ~~o~~Organic ~~H~~Liquid with a True ~~+~~Vapor ~~p~~Pressure of 1.5 psia (77.5 mm Hg) or greater immediately preceding the transfer.

~~(14)~~(19) TRANSFER EQUIPMENT shall consist of all the components of the liquid loading line between any storage tanks, the liquid pump and the transporting vessel, ~~and~~ the vapor return line from the transporting vessel to the storage tank, ~~or to~~ and ~~including~~ the ~~+~~Vapor ~~r~~Recovery System and/or Vapor Disposal ~~s~~System.

~~(15)~~(20) TRANSPORT VESSEL is a tank truck, trailer or railroad tank car that is equipped to receive and transport ~~o~~Organic ~~H~~Liquid.

~~(16)~~(21) TRANSPORT VESSEL VAPOR LEAK is an escape of organic vapors from a ~~t~~Transport ~~+~~Vessel in excess of 100 percent of the ~~LEL~~ lower explosive

limit when monitored according to the California Air Resources Board (CARB) Vapor Recovery Test Procedure TP-204.3 – Determination of Leak(s).

(22) TRUE VAPOR PRESSURE is the vapor pressure of a liquid at the temperature at which a product is stored in a stationary container.

~~(17)~~(23) VAPOR DISPOSAL SYSTEM is a control equipment designed and operated to reduce VOC emissions into the atmosphere.

~~(18)~~(24) VAPOR RECOVERY SYSTEM is a vapor gathering system which is capable of collecting and returning discharged hydrocarbon vapors and gases during loading of ~~o~~Organic Liquids into ~~t~~Transport vessels, back to a stationary storage container, or into an enclosed process system.

(25) VISIBLE VAPORS are any VOC vapors detected with an OGI Device, when operated and maintained in accordance with manufacturer training or certification, or equivalent CARB training, user manuals, specifications, and recommendations. Visible Vapors do not include liquid spillage or condensate resulting from Liquid Leaks.

~~(19)~~(26) VOLATILE ORGANIC COMPOUND (VOC) is ~~any volatile compound containing the element carbon, excluding methane, carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, ammonium carbonate, and exempt compounds as defined in Rule 102.~~

~~(e)~~ Applicability

~~The provisions of this rule shall apply to all the organic liquid loading facilities that are defined as Class A, B or C facilities pursuant to paragraphs (b)(2), (b)(3) and (b)(4) of this rule.~~

(d) Requirements

(1) Loading Requirements at Class A Facilities

(A) Each Class A ~~f~~Facility shall be equipped with

(i) a CARB certified ~~v~~Vapor recovery System and/or Vapor disposal system, or;

(ii) a ~~District~~South Coast AQMD- approved ~~v~~Vapor recovery System and/or Vapor disposal system only when such system does not require CARB certification pursuant to Health and Safety Code 41954.

(B) Each ~~v~~Vapor recovery System and/or Vapor disposal system at a Class A ~~f~~Facility shall be equipped with a continuous monitoring system (CMS)

that is installed, operated, and maintained according to the manufacturer's specifications and is approved by the Executive Officer ~~or designee~~.

(C) The transfer of ~~o~~Organic Liquids shall be accomplished in such a manner that the displaced organic vapors and air are vented under design conditions to the ~~v~~Vapor recovery System and/or Vapor ~~d~~Disposal system.

(D) Each ~~v~~Vapor recovery System and/or Vapor ~~d~~Disposal system shall

(i) ~~reduce the emissions of VOCs to 0.080.040.08 pound or less per thousand gallons (40510 grams per 1,000 liters) of oOrganic L~~iquid transferred, and shall demonstrate compliance with the VOC emission limit by conducting periodic source testing every 60 months pursuant to the requirements in paragraphs (f)(1) and (f)(8); and

(ii) upon CMS plan approval or no later than February 1, 2027, reduce the emissions of VOCs to 0.04 pound or less per thousand gallons (5 grams per 1,000 liters) of Organic Liquid transferred and shall demonstrate compliance with the VOC emission limit by conducting periodic source testing every 60 months pursuant to the requirements in paragraphs (f)(1) and (f)(8).

(E) Any Class A ~~f~~Facility transferring ~~g~~Gasoline into any truck, trailer, or railroad tank car shall be designed and operated for bottom loading only.

(F) The ~~t~~Transfer ~~e~~Equipment shall be operated and maintained so that there are no overfills, ~~f~~Facility ~~v~~Vapor Leaks, Liquid Leaks, or Liquid Leaks from disconnect operations.

(G) Effective August 1, 2026, the Transfer Equipment shall be operated and maintained so that there are no Visible Vapors.

~~(G)~~(H) The backpressure in the vVapor recovery System and/or Vapor ~~d~~Disposal system shall not exceed 18 inches of water column pressure.

(2) Loading Requirements at Class B Facilities

(A) Each Class B ~~f~~Facility shall be equipped with

(i) a CARB certified ~~v~~Vapor recovery System and/or Vapor ~~d~~Disposal system, or;

(ii) a ~~District~~South Coast AQMD-approved ~~v~~Vapor recovery System and/or Vapor ~~d~~Disposal system only when such system does not require CARB certification pursuant to Health and Safety Code 41954.

- (B) Such system shall be designed and operated to recover at least 90 percent of the displaced vapors.
 - (C) The backpressure in the ~~v~~Vapor ~~r~~Recovery ~~s~~System ~~and/or Vapor Disposal System~~ shall not exceed 18 inches of water column pressure.
 - (D) Any Class B ~~f~~Facility transferring ~~g~~Gasoline into any truck, trailer, or railroad tank car, shall be designed for bottom loading only.
 - (E) The ~~t~~Transfer ~~e~~Equipment shall be operated and maintained so that there are no overfills, ~~f~~Facility ~~v~~Vapor ~~H~~Leaks, ~~H~~Liquid ~~H~~Leaks, or ~~H~~Liquid ~~H~~Leaks from disconnect operations.
 - (F) Effective August 1, 2026, the Transfer Equipment shall be operated and maintained so that there are no Visible Vapors.
- (3) Loading Requirements at Class C Facilities
- (A) Each Class C ~~f~~Facility shall be equipped and operated for ~~s~~Submerged ~~f~~Fill ~~H~~Loading or bottom fill loading. All ~~g~~Gasoline or equivalent True ~~v~~Vapor ~~p~~Pressure ~~o~~Organic ~~H~~Liquids shall be transferred in this manner.
 - (B) The ~~t~~Transfer ~~e~~Equipment shall be operated and maintained so that there are no overfills, ~~H~~Liquid ~~H~~Leaks, or ~~H~~Liquid ~~H~~Leak from disconnect operations.
- (4) Loading Requirements for Transport Vessels
- (A) ~~No person~~The owner or operator shall not allow loading or unloading of ~~o~~Organic ~~H~~Liquid or other use or operation of any ~~t~~Transport ~~v~~Vessel unless the vessel has a valid certification of vapor integrity as defined by the applicable ~~Air Resources Board~~CARB Certification and Test Procedures, pursuant to Health and Safety Code Section 41962(g).
 - (B) Transport ~~v~~Vessel ~~v~~Vapor ~~H~~Leaks from dome covers, pressure vacuum vents or other sources shall be determined in accordance with the CARB Vapor Recovery Test Procedure TP-204.3 – Determination of Leak(s).
 - (C) The ~~t~~Transport ~~v~~Vessel shall be operated so that there are no ~~t~~Transport ~~v~~Vessel ~~v~~Vapor ~~H~~Leaks or ~~H~~Liquid ~~H~~Leaks.
- (5) Switch Loading
- Uncontrolled ~~s~~Switch ~~H~~Loading is prohibited except at Class C ~~f~~Facilities.
- (6) Leak Inspection Requirements
- (A) The owner ~~and/or~~ operator of any Class A, B, or C ~~f~~Facility shall be required to perform an inspection of ~~the vapor collection system, the vapor disposal system, and each loading rack~~ the Transfer Equipment handling ~~o~~Organic

~~Liquids, for Facility Vapor Leaks, or Liquid Leaks, of volatile organic compounds or Visible Vapors~~ on one of the following schedules:

- (i) monthly if sight, sound, and smell are used as detection methods and additionally, effective August 1, 2026, monthly using an OGI Device in accordance with paragraph (d)(7); or-
 - (ii) quarterly if an organic vapor analyzer (OVA) is used to monitor for Facility Vapor Leaks, and additionally, effective August 1, 2026, monthly using an OGI Device in accordance with paragraph (d)(7).
- (B) Each detection of a Facility Vapor Leak, Liquid Leak, or Visible Vapors shall be repaired or replaced within ~~72 hours~~ three (3) calendar days. The repaired or replacement component shall be reinspected the first time the component is in operation after the repair or replacement.

(7) Optical Gas Imaging Inspections

- (A) The owner or operator conducting an OGI inspection shall complete a manufacturer's certification or training program, or equivalent CARB training for the OGI Device used to conduct the inspection.
- (B) The owner or operator conducting OGI inspections shall operate and maintain the OGI Device in accordance with the manufacturer's specifications and recommendations.
- (C) In lieu of an OGI inspection, the owner or operator may elect to use an alternative inspection method approved in writing by U.S. EPA that is equivalent or more stringent than a monthly OGI inspection. The owner or operator seeking to use an alternative inspection method shall submit the written approval from U.S. EPA to the Executive Officer for their review and independent approval. The owner or operator shall not use an alternative inspection method unless and until approved by the Executive Officer.

(8) South Coast AQMD Inspection Procedures

- (A) The owner or operator of a Facility may remove Residual Liquid from a Coupler prior to retesting by South Coast AQMD personnel for compliance determination with subparagraphs (d)(1)(F), (d)(1)(G), (d)(2)(E), (d)(2)(F), and (d)(3)(B).
- (B) Effective August 1, 2026, the owner or operator of a Facility shall be in violation of subparagraph (d)(1)(G) or (d)(2)(F), respectively, if South Coast AQMD personnel detect Visible Vapors unless the owner or operator concurrently demonstrates, or no later than one (1) calendar day after

detection for an Inaccessible Component, using an appropriate analyzer in accordance with the test method in paragraph (f)(4) that the Visible Vapors are not a Facility Vapor Leak.

(e) Compliance Schedule

The owner ~~and~~or operator of any Class A, B, or C ~~f~~Facility subject to this rule shall comply with the requirements of subdivision (d) in accordance with the following schedule:

(1) For Class A ~~f~~Facilities subject to paragraph (d)(1):

~~(A) — By July 1, 1996, submit an application to the Executive Officer or designee for permit to construct a new or modified vapor recovery and/or disposal system where applicable.~~

~~(B) — By February 1, 1997, submit a Continuous Monitoring System (CMS) Plan to the Executive Officer or designee for the approval.~~

~~(C) — By February 1, 1998, demonstrate compliance with the organic vapor emission limit of 0.08 pound per thousand gallons of organic liquid transferred.~~

~~(D)~~(A) If required by Health and Safety Code 41954 to equip a Facility with a CARB certified Vapor Recovery System and/or Vapor Disposal System, Within within 30 calendar days after completing construction of a new or modified ~~v~~Vapor ~~r~~Recovery System and/or Vapor ~~d~~Disposal sSystem, a written request shall be submitted to CARB for certification of the new or modified ~~v~~Vapor ~~r~~Recovery System and/or Vapor ~~d~~Disposal sSystem.

~~(E) — CARB Certification or District Approval~~

~~(i) — Any vapor recovery and/or disposal system subject to clause (d)(1)(A)(i) shall meet the following requirements:~~

~~(I) — By February 1, 1999, the existing or modified vapor recovery and/or disposal system shall be CARB-certified.~~

~~(II) — No later than 180 calendar days after completion of construction, any vapor recovery and/or disposal system installed after May 14, 1999 shall be CARB-certified, or;~~

~~(ii) — By December 31, 1999 or 180 calendar days after completing construction, whichever is later, the vapor recovery and/or disposal system subject to Clause (d)(1)(A)(ii) shall be District approved.~~

(B) No later than 180 calendar days after completion of construction, any Vapor Recovery System and/or Vapor Disposal System shall be CARB certified

- or South Coast AQMD approved pursuant to clauses (d)(1)(A)(i) or (d)(1)(A)(ii), respectively.
- (C) No later than February 1, 2027, Title V facilities with a remaining permit term of 3 or more years as of [Date of Amendment], or non-Title V Facilities, that do not have an existing permit condition that complies with subparagraph (d)(1)(D), shall submit a permit modification to indicate a VOC emission limit per (d)(1)(D).
- (D) By February 1, 2026 ~~F~~for a new or modified CMS, submit a CMS Plan to the Executive Officer or designee for approval prior to operation.
- (2) For Class B ~~f~~Facilities subject to paragraph (d)(2):
- (A) ~~Any vapor recovery and/or disposal system subject to clause (d)(2)(A)(i) shall meet the following requirements:~~
- (A) If required by Health and Safety Code 41954 to equip a Facility with a CARB certified Vapor Recovery System and/or Vapor Disposal System, within 30 calendar days after completing construction of a new or modified Vapor Recovery System and/or Vapor Disposal System, a written request shall be submitted to CARB for certification of the new or modified Vapor Recovery System and/or Vapor Disposal System.
- (i) ~~By February 1, 1999, the existing or modified vapor recovery and/or disposal system shall be CARB certified.~~
- (ii) ~~No later than 180 calendar days after completion of construction, any vapor recovery and/or disposal system installed after May 14, 1999 shall be CARB certified, or;~~
- (B) ~~By December 31, 1999 or 180 calendar days after completion of construction, whichever is later, the vapor recovery and/or disposal system subject to clause (d)(2)(A)(ii) shall be District approved.~~
- (B) No later than 180 calendar days after completion of construction, any Vapor Recovery System and/or Vapor Disposal System shall be CARB certified or South Coast AQMD approved, pursuant to clauses (d)(2)(A)(i) or (d)(2)(A)(ii), respectively.
- (3) ~~For Class B facilities that were Class C facilities prior to June 9, 1995 and now are subject to paragraph (d)(2):~~
- (A) ~~By January 1, 1996, submit an application to the Executive Officer or designee for permit to construct and permit to operate a vapor recovery system where applicable.~~

- ~~(B) — By February 1, 1998, demonstrate compliance with the requirement of 90 percent recovery of displaced vapors.~~
- ~~(C) — Within 30 calendar days after completing construction of a new or modified vapor recovery system, a written request shall be submitted to CARB for certification of the new or modified vapor recovery and/or disposal system.~~
- ~~(D) — CARB Certification or District Approval~~
 - ~~(i) — Any vapor recovery and/or disposal system subject to clause (d)(2)(A)(i) shall meet the following requirements:~~
 - ~~(I) — By February 1, 1999, the existing or modified vapor recovery and/or disposal system shall be CARB certified.~~
 - ~~(II) — No later than 180 calendar days after completion of construction, any vapor recovery and/or disposal system installed after May 14, 1999 shall be CARB certified, or;~~
 - ~~(ii) — By December 31, 1999 or 180 calendar days after completion of construction, whichever is later, the vapor recovery and/or disposal system subject to clause (d)(2)(A)(ii) shall be District approved.~~

(f) Compliance Determination/Test Methods

- (1) Compliance with the emission limit of organic vapors as specified in the subparagraph (d)(1)(D) shall be determined according to U.S. EPA Method 25A, 25B or SCAQMD South Coast AQMD Method 501.1, as applicable.
- (2) Continuous Monitoring System required pursuant to subparagraph (d)(1)(B) shall be in compliance with Code of Federal Regulations Title 40 Part 63 Subpart R Section 63.427 and Code of Federal Regulations Title 40 Part 60 Appendix B, as applicable.
- (3) Compliance with the vapor recovery efficiency as specified in the subparagraph (d)(2)(B) shall be determined according to the CARB Vapor Recovery Certification Procedure CP-202 – Certification Procedure for Vapor Recovery Systems of Bulk Plants or, for the ~~∅~~Vapor ~~∅~~Recovery System and/or Vapor ∅Disposal ~~∅~~System subject to ~~∅~~clause (d)(2)(A)(ii), the ~~SCAQMD South Coast AQMD Approval Procedure for Vapor Recovery Systems of Bulk Plants dated May 14, 1999.~~
- (4) Determinations of ~~∅~~Facility ~~∅~~Vapor ~~∅~~Leaks as defined in the paragraph (b)(79) shall be conducted according to U.S. EPA Method 21.
- (5) Compliance with the requirements of ~~District South Coast AQMD~~ approval for ~~∅~~Vapor ~~∅~~Recovery System and/or Vapor ∅Disposal ~~∅~~Systems as specified in subparagraphs (d)(1)(A) and (d)(2)(A) shall be determined according to the ~~District~~

South Coast AQMD Approval Procedure for Vapor Recovery Systems for Bulk Plants dated May 14, 1999. All testing required in the ~~District~~ South Coast AQMD Approval Procedure for Vapor Recovery and/or Disposal System shall be conducted by testing firms/laboratories that have been approved by the ~~District~~ South Coast AQMD for the specific tests under the Laboratory Approval Program.

- (6) Any other alternative test method approved in writing by the ~~District~~ South Coast AQMD, CARB, and U.S. EPA may be used only when none of the test methods identified in this subdivision are applicable.
- (7) When more than one test method or set of test methods are specified for any testing, a violation of any requirements of this rule established by any one of the specified test methods or set of test methods shall constitute a violation of the rule.

(8) Source Testing

The owner or operator of a Facility required to conduct source testing shall:

- (A) Prior to conducting source testing to demonstrate compliance, submit a source test protocol for approval to the Executive Officer;
 - (B) Submit an updated or new source test protocol if there are any modifications to the Vapor Recovery System and/or Vapor Disposal System or if the Executive Officer requests an updated or new source test protocol;
 - (C) Submit a source test protocol for facilities that have not already been conducting periodic source testing by August 1, 2026, and conduct the source test by August 1, 2027;
 - (D) Conduct source testing pursuant to the most recent source test protocol approved by the Executive Officer; and
 - (E) Submit the source testing report to the Executive Officer within 60 days of completing all sampling for source testing.
- (9) The True Vapor Pressure of Organic Liquid shall be determined by ASTM Method D-323 for Reid vapor pressure, or ASTM Method D-6377 correlated to ASTM D-323, and converted to True Vapor Pressure using applicable nomographs in EPA AP-42 or South Coast AQMD and EPA approved nomographs. The actual storage temperature used for determining True Vapor Pressure shall be 70 degrees Fahrenheit for Organic Liquids that are stored at ambient temperatures, and actual storage temperature for Organic Liquids that are stored at above ambient temperatures.

(g) Recordkeeping Requirements

- (1) The owner ~~and~~or operator of any Class A, B, or C ~~f~~Facility, in order to verify the classification of such ~~f~~Facility, shall maintain a daily log of the throughput and a summary of the throughput for the calendar year to date, of the liquid organic compounds subject to the provisions of this rule. A log showing daily compliance shall suffice to satisfy this requirement.
 - (2) The owner ~~and~~or operator of any Class A, B, or C ~~f~~Facility shall maintain records for verification of compliance with the requirements in paragraphs (d)(6) and (d)(7). The records shall include, ~~but are not limited to,~~ inspection dates, description of leaks detected, repair/replacement dates, and reinspection dates.
 - (3) All records shall be maintained at the ~~f~~Facility for at least two years or a period of five years for a Title V Facility and shall be made available to the Executive Officer ~~or designee~~ upon request.
- (h) Distribution of Responsibilities
- (1) The owner and operator of any Class A, B, or C ~~f~~Facility shall be responsible and liable for complying with the provisions of paragraphs (d)(1), (d)(2), (d)(3), ~~and (d)(6), (d)(7), and (f)(8)~~ and subdivisions (e) and (g) of this rule, and for maintaining the equipment at the ~~f~~Facility in such condition that it can comply with the requirements of this rule if properly operated. If employees of the owner or operator of the ~~f~~Facility supervise or affect the transfer operation, the owner or operator of the ~~f~~Facility shall be responsible for ensuring that the transfer operation complies with all requirements of this rule and that the ~~t~~Transfer ~~e~~Equipment is properly operated.
 - (2) The owner, operator, and driver of a ~~t~~Transport ~~v~~Vessel shall be responsible and liable for complying with paragraphs (d)(4) and (d)(5) of this rule.
- (i) Ozone Contingency Measure
- (1) On and after 60 days following the effective date of a final rule by U.S. EPA that the conditions described in Clean Air Act Sections 172(c)(9) and 182(c)(9) have occurred in the Coachella Valley area regarding the 2008 or 2015 ozone NAAQS, the Contingency Measure specified in paragraph (i)(2) shall be implemented.
 - (2) The owner or operator of any Class A, ~~or B, or C~~ Facility shall be required to perform an inspection of Transfer Equipment for Visible Vapors at least once every two (2) calendar weeks using an OGI Device in accordance with paragraph (d)(7).
- (~~i~~)(j) Exemptions

- (1) The provisions of subparagraphs (d)(1)(F), ~~(d)(1)(G)~~, (d)(2)(E), ~~(d)(2)(F)~~ and (d)(3)(B) shall not apply to components found in violation of ~~Facility~~ Vapor Leaks, ~~or Liquid Leaks~~, ~~either of which is or~~ Visible Vapors detected and recorded originally by the owner or operator, provided the repair or replacement of applicable equipment is completed within the specified period as given in subparagraph (d)(6)(B).
- (2) The provisions of subparagraphs (d)(1)(A), and (d)(1)(B) shall not apply to ~~Vapor Recovery Systems~~ and/or ~~Vapor Disposal Systems~~ which vent displaced hydrocarbon vapors to an adjacent refinery flare or other combustion device that receives gaseous streams from other refinery sources.
- (3) ~~The provisions of subparagraph (d)(6)(A) for the monthly inspection using an OGI Device shall not apply to Class C Facilities.~~
- (4) ~~The provisions of Rules 466 and 466.1 shall not apply to Facilities subject to this rule.~~
- (5) ~~The provisions of subparagraphs (d)(6), (d)(7), and (d)(8) shall not apply to equipment subject to Rule 1173.~~

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Final Staff Report Proposed Amended Rule 462 – Organic Liquid Loading

August 2025

Deputy Executive Officer

Planning, Rule Development, and Implementation
Sarah L. Rees, Ph.D.

Assistant Deputy Executive Officer

Planning, Rule Development, and Implementation
Michael Krause

Planning and Rules Manager

Planning, Rule Development, and Implementation
Michael Morris

| | | | |
|---------------|-------------------------------|-------------------------|-----------------------------------|
| Author: | Jose Enriquez | – | Air Quality Specialist |
| Contributors: | Zoya Banan, Ph.D. | – | Air Quality Specialist |
| | Khiem Giang | – | Senior Air Quality Engineer |
| | Gregory Jacobson | – | Senior Air Quality Engineer |
| | Joseph Liaw | – | Supervising Air Quality Inspector |
| | Kevin Ni | – | Program Supervisor |
| | Kevin Orellana | – | Senior Enforcement Manager |
| | Barbara Radlein | – | Planning and Rules Manager |
| | Valerie Rivera | – | Assistant Air Quality Specialist |
| | Xian-Liang (Tony) Tian, Ph.D. | – | Program Supervisor |
| Connie Wong | – | Air Quality Engineer II | |
| Reviewed by: | Erika Chavez | – | Principal Deputy District Counsel |
| | James McCreary | – | Air Quality Specialist |
| | Isabelle Shine | – | Program Supervisor |
| | Areio Soltani | – | Air Quality Specialist |

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
GOVERNING BOARD**

Chair: VANESSA DELGADO
Senator (Ret.)
Senate Rules Committee Appointee

Vice Chair: MICHAEL A. CACCIOTTI
Councilmember, South Pasadena
Cities of Los Angeles County/Eastern Region

MEMBERS:

CURT HAGMAN
Supervisor, Fourth District
County of San Bernardino

PATRICIA LOCK DAWSON
Mayor, Riverside
Cities of Riverside County Representative

LARRY MCCALLON
Mayor Pro Tem, Highland
Cities of San Bernardino County

HOLLY J. MITCHELL
Supervisor, Second District
County of Los Angeles

JANET NGUYEN
Supervisor, First District
County of Orange

BRENDA OLMOS
Councilmember, City of Paramount
Cities of Los Angeles County/Western Region

VERONICA PADILLA-CAMPOS
Speaker of the Assembly Appointee

V. MANUEL PEREZ
Supervisor, Fourth District
County of Riverside

NITHYA RAMAN
Councilmember, Fourth District
City of Los Angeles Representative

CARLOS RODRIGUEZ
Councilmember, Yorba Linda
Cities of Orange County

VACANT
Governor's Appointee

EXECUTIVE OFFICER:

WAYNE NASTRI

TABLE OF CONTENTS

| | |
|---|------------|
| EXECUTIVE SUMMARY | EX-1 |
| CHAPTER 1: BACKGROUND | |
| INTRODUCTION | 1-1 |
| BACKGROUND | 1-1 |
| REGULATORY HISTORY | 1-3 |
| AFFECTED FACILITIES | 1-4 |
| PUBLIC PROCESS | 1-5 |
| CHAPTER 2: BARCT ASSESSMENT | |
| INTRODUCTION | 2-1 |
| ADVANCED LEAK DETECTION AND REPAIR..... | 2-2 |
| VAPOR CONTROL SYSTEMS..... | 2-6 |
| FACILITY LEAK THRESHOLD..... | 2-9 |
| BARCT EMISSION LIMITS | 2-9 |
| CHAPTER 3: SUMMARY OF PROPOSALS | |
| INTRODUCTION | 3-1 |
| PROPOSED AMENDED RULE STRUCTURE..... | 3-1 |
| PROPOSED AMENDED RULE 462..... | 3-1 |
| CHAPTER 4: IMPACT ASSESSMENTS | |
| INTRODUCTION | 4-1 |
| EMISSION REDUCTIONS | 4-1 |
| COST-EFFECTIVENESS | 4-3 |
| INCREMENTAL COST-EFFECTIVENESS | 4-6 |
| SOCIOECONOMIC IMPACT ASSESSMENT | 4-7 |
| CALIFORNIA ENVIRONMENTAL QUALITY ACT ANALYSIS | 4-16 |
| DRAFT FINDINGS UNDER HEALTH AND SAFETY | |
| CODE SECTION 40727 | 4-16 |
| COMPARATIVE ANALYSIS | 4-17 |
| APPENDIX A: <u>RESPONSE TO PUBLIC COMMENTS</u>RESPONSES TO COMMENT | |
| LETTERS | A-1 |

EXECUTIVE SUMMARY

Rule 462 – Organic Liquid Loading (Rule 462) controls emissions of volatile organic compounds (VOCs) during the loading of organic liquids into transport vessels. Rule 462 applies to approximately 53 facilities that conduct organic liquid loading within South Coast AQMD’s jurisdiction.

Proposed Amended Rule 462 (PAR 462) was developed ~~to~~ in response to priorities identified in the Wilmington, Carson, West Long Beach (WCWLB) Community Emission Reduction Plan (CERP), and to partially implement the 2022 Air Quality Management Plan (AQMP) Control Measure FUG-01 – Improved Leak Detection and Repair. The objective of PAR 462 is to further reduce VOC emissions from organic liquid loading by: 1) requiring monthly optical gas imaging (OGI) inspections; 2) requiring periodic source tests on all Class A facilities’ vapor control systems; and 3) reducing VOC limits for vapor control systems. Reducing the VOC limit is expected to reduce VOC emissions from vapor control systems at Class A facilities by 50%, or 0.30 ton VOC per day. Introducing OGI inspections are expected to reduce VOC emissions by 0.04 ton per day. The combined VOC emission reductions for PAR 462 are 0.34 ton per day. The overall cost-effectiveness of PAR 462 is ~~\$32,600~~ \$37,800 per ton of VOC reduced.

Additionally, PAR 462 will introduce a contingency measure to partially satisfy Clean Air Act contingency requirements for applicable ozone National Ambient Air Quality Standards in the South Coast AQMD’s jurisdiction. The contingency measure, if triggered, would require more frequent OGI inspections and is expected to further reduce VOC emissions by 0.05 ton per day.

Development of PAR 462 was conducted through a public process. Two Working Group meetings were held on November 6, 2024, and March 5, 2025. The Working Group is composed of representatives from businesses, environmental groups, public agencies, and consultants. A Public Workshop was held on April 2, 2025. The purpose of the Public Workshop is to present the proposed amended rule language to the general public and stakeholders and to solicit comments. Staff also conducted multiple site visits as part of this rulemaking process.

CHAPTER 1: BACKGROUND

INTRODUCTION

BACKGROUND

REGULATORY HISTORY

AFFECTED FACILITIES

PUBLIC PROCESS

INTRODUCTION

Rule 462 – Organic Liquid Loading seeks to control emissions of volatile organic compounds (VOCs) originating from bulk terminals and other facilities that load organic liquids into tank trucks, trailers, or railroad tank cars. An example of a bulk terminal is shown in Figure 1.1. The transfer of organic liquids with a true vapor pressure of 1.5 psia (77.5 mm Hg) or greater, such as gasoline or ethanol, is subject to Rule 462 while the transfer of less volatile organic liquids, such as diesel or jet fuel, is not subject to Rule 462. Likewise, the transfer of organic liquids from gasoline storage and dispensing facilities, colloquially known as gas stations, to motor vehicles and their associated fuels tanks is subject to Rule 461 – Gasoline Transfer and Dispensing. However, some facilities both dispense gasoline to motor vehicles and transfer gasoline or other organic liquids to tank trucks for dispensing to motor vehicles or aircraft, gasoline-fired equipment, intermediate storage tanks, or other uses. For those specific types of facilities, both Rules 461 and 462 apply.



Figure 1.1 – Tank Trucks at a Bulk Terminal

Proposed Amended Rule (PAR) 462 seeks to further reduce VOC emissions from bulk terminals by requiring advanced leak detection and repair (LDAR) technology and reducing the VOC limit of vapor control systems. Additional proposed amendments to Rule 462 include specifying source test requirements of vapor control systems at Class A facilities, establishing contingency measures, adding new and updated definitions, and implementing other minor changes for consistency and clarity.

BACKGROUND

Contingency Measure SIP Revision

The U.S. Environmental Protection Agency (U.S. EPA) requires areas that do not meet a National Ambient Air Quality Standard (NAAQS or standard) to develop and submit a State

Implementation Plan (SIP) for approval. SIPs are used to show how the region will meet the standard. Regions must attain NAAQS by specific dates or face the possibility of sanctions by the federal government and other consequences under the Clean Air Act (CAA). This can result in stricter restrictions for permitting new projects and the loss of federal highway funds.

In August 2018, the U.S. EPA designated the South Coast Air Basin (Basin) as “extreme” nonattainment and the Coachella Valley area as “severe-15” nonattainment for the 2015 8-hour ozone standard. The Basin includes large areas of Los Angeles, Orange, Riverside, and San Bernardino counties. The Coachella Valley area is the desert portion of Riverside County in the Salton Sea Air Basin. “Extreme” nonattainment areas must attain the 2015 8-hour ozone standard by August 2038 and “severe” nonattainment areas must attain it by August 2033.

In March 2024, the South Coast AQMD Governing Board approved the Coachella Valley Contingency Measure SIP Revision for the 2008 8-Hour Ozone Standard which focused on satisfying the requirement for contingency measure elements.¹ Contingency measures are defined by CAA Section 172(c)(9) as “specific measures to be undertaken if the area fails to make reasonable further progress, or to attain the national primary ambient air quality standard by the attainment date.” CAA Section 182(c)(9) further requires that ozone nonattainment areas classified as “serious” or above provide for contingency measures to be implemented if the area fails to meet any applicable milestone.

South Coast AQMD is amending Rule 462 to introduce a contingency measure for the 2008 and 2015 8-Hour Ozone Standard that would require more frequent enhanced leak detection inspections with optical gas imaging (OGI) devices to facilitate leak detection and repair. Emission reductions would be achieved by identifying leaks more quickly and repairing them. Triggers are included if a nonattainment area fails to attain the NAAQS by the applicable attainment date or fails to meet a reasonable further progress (RFP) milestone, as identified by U.S. EPA. If such an event occurs, the contingency measure would implement a more stringent OGI inspection frequency within 60 days of the effective date of the U.S. EPA finding.

Control Measures in the 2012, 2016, and 2022 Air Quality Management Plans (AQMPs)

Control Measure FUG-03 – Further Reductions of Fugitive VOC Emissions in the 2012 Final AQMP identifies the implementation of advanced leak detection technologies, including OGI, as a method to reduce the emissions impact from leaks. The 2016 Final AQMP included Control Measure FUG-01 – Improved Leak Detection and Repair to utilize advanced remote sensing technologies to allow for faster identification and repair of leaks from equipment at oil and gas sites and other facilities that are currently required to maintain an LDAR program. The 2022 AQMP also included Control Measure FUG-01 – Improved Leak Detection and Repair to reduce VOC emissions from fugitive leaks from process and storage equipment. PAR 462 partially

¹[https://www.aqmd.gov/home/air-quality/air-quality-management-plans/other-state-implementation-plan-\(sip\)-revisions/coachella-valley-contingency-measure-sip-revision](https://www.aqmd.gov/home/air-quality/air-quality-management-plans/other-state-implementation-plan-(sip)-revisions/coachella-valley-contingency-measure-sip-revision)

implements Control Measure FUG-01 that commits to improved leak detection requirements in South Coast AQMD rules, including Rule 462. In addition, PAR 462 implements priorities that were identified in the WCWLB CERP, including requiring additional monitoring.

REGULATORY HISTORY

Rule 462 was originally adopted on January 9, 1976 at the South Coast AQMD's first Governing Board Meeting, signifying the importance of this rule and these sources of emissions (see Figure 1.2). Subsequently, Rule 462 was amended a total of six (6) times:



Figure 1.2 – Example of a Vapor Recovery System

1978 and 1979 Amendments

The first and second amendments to Rule 462 in May 1978 and October 1979, respectively, addressed the control efficiencies of vapor recovery and/or disposal systems. The 1979 amendment established a VOC emissions limit of 0.65 pound per thousand gallons transferred based on recommendations from the California Air Resources Board (CARB).

1986 Amendment

On March 2, 1984, South Coast AQMD Regulation IX, Subpart XX – Standards of Performance for Bulk Gasoline Terminals², was adopted to set a VOC emissions limit of 0.29 pounds per thousand gallons of organic liquid transferred for new or modified loading facilities with a daily throughput of 20,000 gallons or greater. In 1986, Rule 462 was reviewed for further VOC emission reduction potential through application of the New Source Performance Standards (NSPS) emission limit. This resulted in a subsequent amendment to Rule 462 which instituted a VOC

² This regulation is no longer in effect and is not part of the South Coast AQMD portion of the SIP.

emission limit of 0.29 pounds per thousand gallons for Class A facilities (20,000 gallons or more loaded per day).

1990 Amendment

The 1990 amendment to Rule 462 was primarily an administrative amendment to delete an outdated compliance schedule.

1995 Amendment

The 1995 amendment implemented Control Measure #94FUG-01 of the 1994 AQMP, which was adopted to comply with the California and Federal Clean Air Acts. The amendment reduced the VOC emission limit from 0.29 to 0.08 pounds VOC per 1,000 gallons of organic liquid transferred in Class A facilities as required under the Code of Federal Regulations (CFR) Title 40, Part 63, Subpart R (National Emission Standards for Gasoline Distribution Facilities). This amendment also clarified rule language to enhance enforceability.

1999 Amendment

The 1999 amendment addressed a vapor leak measurement issue identified by U.S. EPA by amending the definition of facility vapor leak to align with U.S. EPA Method 21. The amendment also provided a compliance mechanism for the vapor recovery systems that do not require CARB certification pursuant to Health and Safety Code Section 41954. The Approval Procedure for Vapor Recovery Systems of Bulk Plants was included as Appendix A to this rulemaking. Other changes included clarifying the backpressure requirement for Class A facilities and the vapor leak requirement for transfer vessels.

AFFECTED FACILITIES

PAR 462 affects approximately 53 facilities within the South Coast AQMD's jurisdiction. Of these, 20 facilities are Class A facilities. Class A facilities load 20,000 gallons or more of organic liquids on any one day. There are 20 Class A facilities subject to Rule 462 that are considered major sources of emissions and hold federally enforceable Title V facility operating permits³. The remaining 33 facilities subject to Rule 462 do not meet the applicability requirements for Title V permits and are either Class B facilities or Class C facilities. Class B facilities generally load no

³ Emission thresholds for Title V applicability are specified in Rule 3001 – Applicability

more than 20,000 gallons of gasoline per day⁴. Staff identified 31 Class B facilities. Class C facilities were constructed prior to January 9, 1976, and load no more than 4,000 gallons of gasoline per day and no more than 500,000 gallons in any one calendar year. Staff identified two Class C facilities.

PUBLIC PROCESS

The development of PAR 462 was conducted through a public process. Two Working Group Meetings were held on November 6, 2024 and March 5, 2025. Stakeholders include representatives from the community, environmental organizations, industry representatives, and government agencies. Staff also met individually with industry stakeholders and visited sites affected by the rule development process. A Public Workshop meeting was held on April 2, 2025, where staff presented the proposed amended rule to the general public and stakeholders, and solicited comments.

⁴ Rule 462 defines Class B facility as any facility which was constructed before January 9, 1976 and loads more than 4,000 gallons (15,140 liters) but not more than 20,000 gallons (75,700 liters) of gasoline on any one day into any tank truck, trailer, or railroad tank car; or which was constructed before January 9, 1976 and loads not more than 4,000 gallons (15,140 liters) of gasoline on any one day, but more than 500,000 gallons (1,892,500 liters) of gasoline in any one calendar year, into any tank truck, trailer, or railroad tank car; or which was constructed after January 9, 1976 and loads not more than 20,000 gallons (75,700 liters) of gasoline on any one day into a tank truck, trailer or railroad tank car.

CHAPTER 2: BARCT ASSESSMENT

INTRODUCTION

ADVANCED LEAK DETECTION AND REPAIR

VAPOR CONTROL SYSTEMS

FACILITY LEAK THRESHOLD

BARCT EMISSION LIMITS

INTRODUCTION

As part of the rule development process, staff conducted a Best Available Retrofit Control Technology (BARCT) assessment of equipment subject to PAR 462. The purpose of a BARCT assessment is to identify potential emission reductions from specific equipment and to establish an emission limit consistent with state law.

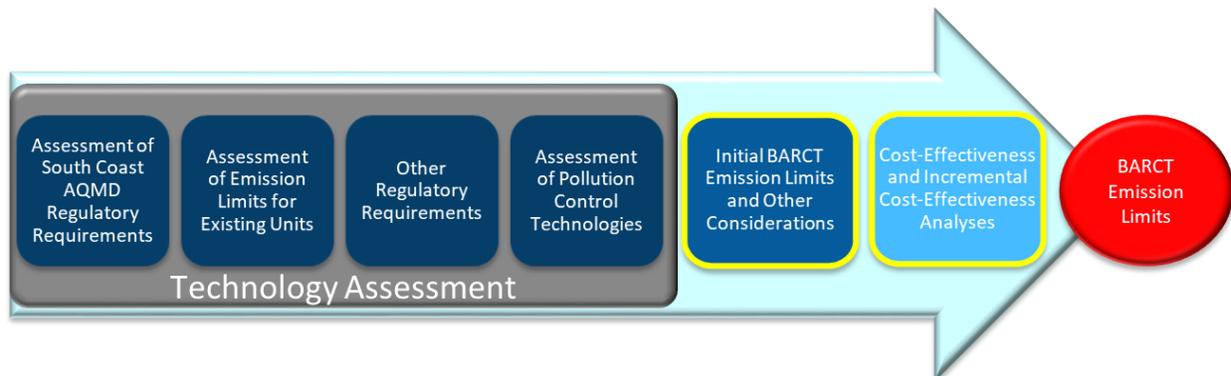
Under Health and Safety Code Section 40406, BARCT is defined as:

“... an emission limitation that is based on the maximum degree of reduction achievable, taking into account environmental, energy, and economic impacts by each class or category of source.”

The BARCT assessment for this rule development consisted of a multi-step analysis. The first four steps represent the technology assessment. First, staff evaluated current South Coast AQMD regulatory requirements. Second, staff assessed emission limits for existing units. Third, staff reviewed rules and regulations of other air districts and agencies to identify emission limits that exist for similar equipment. In the final step of the technology assessment, staff assessed pollution control technologies to determine what degree of reduction could be achievable for the affected sources. Based on the technology assessment and additional considerations, initial emission limits were proposed.

Staff then calculated the cost-effectiveness of the proposals. The calculations consider the cost to meet the initial BARCT emission limit and the emission reductions that would occur from implementing technology that could meet the initial BARCT emission limit. An incremental cost-effectiveness analysis is conducted if multiple control technology options are identified that meet the emission reduction objective. Based on the evaluation of information, BARCT emission limits are recommended. See Figure 2-1 below for a graphical representation of the BARCT assessment process.

Figure 2.1 – BARCT Assessment Process



In this rulemaking effort, staff proposed the following BARCT requirements to be incorporated into PAR 462:

- (1) Adding the use of enhanced monitoring and leak detection techniques
- (2) Reducing emission limits for vapor recovery systems and/or vapor disposal systems from 0.08 pounds VOC per thousand gallons (10 grams per 1,000 liters) of organic liquid transferred to 0.04 pounds VOC per thousand gallons (5 grams per 1,000 liters) transferred

ADVANCED LEAK DETECTION AND REPAIR

- *Assessment of Current South Coast AQMD Regulatory Requirements*

Rule 462 requires quarterly inspections with an organic vapor analyzer (OVA) calibrated with methane per U.S. EPA Reference Method 21 to inspect components and equipment (See Figure 2.2). An OVA is capable of measuring a variety of organic vapors using flame ionization detection (FID) technology and it provides a concentration value of the organic vapor.



Figure 2.2 – Example of an OVA Analyzer

In lieu of a quarterly OVA inspection, Rule 462 allows facilities to conduct a monthly leak inspection via sight, sound, and smell as a detection method.

- *Assessment of Emission Limits of Existing Units*

The use of OGI equipment does not have an emission limit relevant to this analysis. As such, no assessment of emission limits of existing units is required.

- *Other Regulatory Requirements*

Staff reviewed rules and regulations from other air districts and agencies and noted that the use of enhanced monitoring techniques was limited. One example of enhanced leak detection technology is OGI.

San Joaquin Valley Air Pollution Control District (SJVAPCD) Rule 4624 – Transfer of Organic Liquid, does not require OGI inspections. However, subsection 6.3.8.1, requires that after June 30, 2024, all leaks detected with OGI be measured by U.S. EPA Method 21 within two calendar days of initial OGI leak detection.⁵ Quarterly inspections by U.S. EPA Method 21 are required.



Figure 2.3 – Example of Camera

Bay Area Air Quality Management District (Bay Area AQMD) Regulation 8, Rule 33 – Gasoline Bulk Terminals and Gasoline Cargo Tanks was amended on November 3, 2021, but does not reference OGI

inspection requirements. Gasoline bulk terminal owners or operators are required to develop and submit a monitoring, inspection, notification, and reporting plan for approval.

Under U.S. EPA – Title 40, Chapter 1, Subchapter C, Part 60, Subpart XXa – Standards of Performance for Bulk Gasoline Terminals that Commenced Construction, Modification, or Reconstruction After June 10, 2022, the use of an OGI camera is required quarterly for all pumps and valves, and annually for all connectors.⁶ Leak detection thresholds are quantified using an OVA or equivalent device.

- *Assessment of Pollution Control Technologies*

OGI equipment does not control pollution directly but is a tool that can be used to identify emissions. As such, no assessment of pollution control technology is required for adding the use of enhanced monitoring and leak detection techniques. However, a discussion on current enhanced monitoring and leak detection technologies is included.

Continuous monitoring solutions using open path detection and fixed gas sensor networks were assessed in 2023 for the Rule 1178 rulemaking. It was determined that the best solution for monitoring tanks is to require periodic monitoring with handheld OGI devices due to their ability to identify small and large leaks. Continuous monitoring systems are limited in their ability to detect smaller leaks because they are installed at a distance. Depending on the detection technology of the continuous monitoring system, a leak may need to be significantly large at the source to be detected and has the potential to go undetected. Another drawback to requiring continuous monitoring systems is the delayed implementation timeline due to the plan approval and installation timeframes.

⁵ San Joaquin Valley Air Pollution Control District (SJVAPCD) Rule 4624 – Transfer of Organic Liquid, subsection 6.3.8.1: <https://ww2.valleyair.org/media/kgalm4y4/rule-4624.pdf>, p. 4624-12, accessed on February 24, 2025.

⁶ U.S. EPA – Title 40, Chapter 1, Subchapter C, Part 60, Subpart XXa – Standards of Performance for Bulk Gasoline Terminals that Commenced Construction, Modification, or Reconstruction After June 10, 2022: <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-XXa>, accessed on February 24, 2025.

Optical Gas Imaging

An optical gas imaging camera uses infrared technology capable of visualizing vapors. OGI cameras have different detectors capable of visualizing a variety of gas wavelengths. VOC wavelengths are in the 3.2-3.4 micrometer waveband.

The cameras are widely used as a screening tool for leak detection purposes and have continuous monitoring capability. Handheld OGI cameras are used widely by leak detection service providers as well as facilities for periodic monitoring.



Figure 2.4 – OGI Camera Imaging

Open Path Sensors

Open path detection devices emit beams that detect VOCs (See Figure 2.5). For VOCs to be detected with an open path device, the VOCs must contact the beam. Open path detection devices can detect gas concentrations in the parts per billion range and from distances as far as 300 meters away from a source, with some models advertised as having a measurement distance of 1,000 meters. One open path device can cover multiple paths and also speciate VOCs. A significant limitation to leak detection using these devices is the requirement for VOCs to contact the emitted beam. This provides a risk for VOCs to go undetected if they travel on a path that does not intercept the beam. Another drawback to open path detection is the dilution factor. VOCs originating from a tank may need to travel hundreds of feet before contacting the emitted beam. The concentration of VOC may dilute so significantly that VOCs are undetectable by the time they reach the emitted beam.

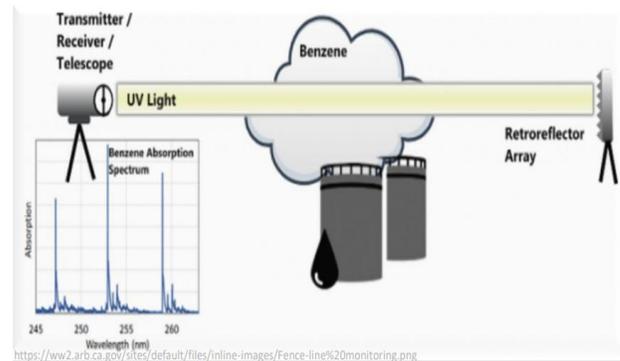


Figure 2.5 – Example of Open Path Technology

Fixed Gas Sensors

Fixed gas sensors have the capability to continuously monitor for VOC emissions and are installed as fixed applications (See Figure 2.6). Concentrations of VOC detected with fixed gas sensors are in the parts per million by volume (ppmv) range depending on the sensor and have a maximum detection range of about 50-100 ppmv. Like open path devices, gas sensors can only detect emissions when VOCs contact the fixed sensor. Leaks from a source must be significant to be detected by a fixed gas sensor due to the dilution factor. According to one supplier, it is estimated that a leak with a concentration of 72,000 ppmv is detectable by a gas sensor 100 feet away. A leak with a concentration of 18,000 ppmv is detectable by a gas sensor 50 feet away.



Figure 2.6 – Example of a Fixed Gas Sensor

- *Initial BARCT Emission Limits and Other Considerations*

Staff determined that the advanced monitoring technology most suitable to identify sources of leaks at organic liquid loading facilities is handheld OGI devices. Other South Coast AQMD rules, specifically Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities, Rule 463 – Organic Liquid Storage, Rule 1148.1 – Oil and Gas Production Wells, and Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants, have OGI inspection requirements summarized in the table below:

| Table 2.1 Monitoring Requirements in Other South Coast AQMD Rules | | | | |
|---|------------------|-----------------|--------------------|------------------|
| Regulation | Rule 1178 | Rule 463 | Rule 1148.1 | Rule 1173 |
| OGI Monitoring Requirement | Weekly | Every 2 Weeks | Monthly | Monthly |

Facilities subject to Rule 462 may also be subject to Rules 1173 and 463 which have a monthly and every two-week OGI inspection requirement, respectively. OGI inspections are proposed as a PAR 462 requirement for consistency with other South Coast AQMD rule requirements and therefore can reduce cost impacts to facilities for OGI devices, training, and other costs.

- *Costs and Cost-Effectiveness*

Costs were obtained from OGI camera vendors and from owners and operators of affected facilities with handheld OGI cameras. An OGI camera costs approximately \$120,000. Maintenance is estimated to cost \$1,500 per year. Staff analyzed cost-effectiveness for organic liquid loading facility inspections at increasing frequencies using OGI devices, assuming owner or operator ownership of the cameras. The results are the following:

| Table 2.2 Cost-Effectiveness of OGI Inspection Frequencies | | |
|--|-------------|-----------------|
| | Monthly | Every Two Weeks |
| Total Cost over 10 Years (\$) | \$4,628,902 | \$6,702,100 |
| Total Emission Reductions (tons/10 years) | 146 | 182.5 |
| Cost-Effectiveness (\$ / ton VOC) | \$31,700 | \$36,700 |
| Incremental Cost-Effectiveness (\$ / ton VOC) | N/A | \$56,800 |

As shown in Table 2.2, monthly OGI inspections and OGI inspections every two weeks are below the cost-effectiveness threshold⁷, but the incremental cost-effectiveness of OGI inspections every two weeks is above the cost-effectiveness threshold. Staff proposes OGI inspections monthly, as the frequency is both cost-effective and incrementally cost-effective. Refer to Chapter 4 for details on costs and cost-effectiveness.

VAPOR CONTROL SYSTEMS

- *Assessment of Current South Coast AQMD Regulatory Requirements*

Currently, Rule 462 has an emission limit of 0.08 pounds VOC per thousand gallons of organic liquid transferred for vapor recovery systems and/or vapor disposal systems at Class A facilities. Class B facilities are required to recover at least 90% of displaced vapors with a vapor recovery system and/or vapor disposal system. Class C facilities are not required to have vapor recovery and/or vapor disposal systems. Rule 462 does not require periodic demonstration of this emission limit with source testing.

- *Assessment of Emission Limits for Existing Units*

Staff assessed reducing emission limits for vapor recovery systems and/or vapor disposal systems for Class A facilities from 0.08 pounds VOC per thousand gallons (10 grams per 1,000 liters) of organic liquid transferred to 0.04 pounds VOC per thousand gallons (5 grams per 1,000 liters). Initial review of source tests indicate that facilities are already meeting a proposed new limit of 0.04 pounds VOC per thousand gallons of organic liquid transferred. In addition, some facilities already have existing emission limits lower than 0.08 pounds VOC per thousand gallons organic liquid transferred in permits to operate.

⁷ The 2022 AQMP established a cost-effectiveness threshold of \$36,000 per ton of VOC reduced which is updated annually to account for inflation (2024-inflation adjusted is \$41,400/ton)

- *Other Regulatory Requirements*



Figure 2.7 – Example of a Vapor Disposal System

During the review of current emission limits for VOC regarding vapor recovery systems and/or vapor disposal systems, staff discovered that the Bay Area AQMD has an organic compound emission limit of 0.04 pounds VOC per thousand gallons of organic liquid loaded⁸. As a component of the 2016 AQMP, South Coast AQMD was required to submit a Reasonably Available Control Technology (RACT) Demonstration to U.S. EPA. In 2014, South Coast AQMD completed this RACT Demonstration and identified BAAQMD’s Reg. 8, Rule 33 VOC limit for gasoline bulk terminal and cargo tank operations as more restrictive than Rule 462.⁹ Staff assessed the feasibility of reducing this VOC limit as part of the 2016 AQMP control measure development and it was not included as a feasible control measure at that time, primarily due to it being not cost-effective.

- *Assessments of Pollution Control Technologies*



Figure 2.8 - Example of a Vapor Recovery System

During the rule development process, staff visited multiple sites where vapor recovery systems and/or vapor disposal systems were being used to control VOC emissions from gasoline and other organic liquid vapors (See Figure 2.7).

- *Vapor Recovery Systems*

Rule 462 defines a vapor recovery system as a vapor gathering system which is capable of collecting and returning discharged hydrocarbon vapors and gases during the loading of organic liquids into transport vessels, back to a stationary storage container, or into an enclosed process system. A common vapor recovery system utilizes carbon adsorbers and scrubbers to convert organic vapors back into a liquid phase. Typically, two or more carbon beds are used with one bed used for

⁸ Bay Area Air Quality Management District Rule 33 – *GASOLINE BULK TERMINALS AND GASOLINE CARGO TANKS*, subsection 8-33-301 https://www.baaqmd.gov/~media/dotgov/files/rules/refinery-rules-definitions/rg0833_20211103-pdf p. 8-33-5, accessed on February 24, 2025.

⁹ South Coast AQMD 2016 AQMP Reasonably Available Control Technology Demonstration, <https://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2014/2014-jun6-031.pdf>, p. 16, accessed on February 24, 2025.

recovery and removal of vapors and other beds in standby mode or in regenerating mode.

- *Vapor Disposal Systems*

Rule 462 defines a vapor disposal system as a control equipment designed and operated to reduce VOC emissions into the atmosphere. As opposed to vapor recovery systems which convert vapor to liquid, vapor disposal systems destroy organic vapors before entering the atmosphere. Examples of vapor disposal systems include thermal oxides, incinerators, and flares.

- *Associated Emissions*

Of the four sites visited, staff determined that all facility vapor systems - both vapor recovery systems and vapor disposal systems - were emitting less than 0.04 pounds VOC per thousand gallons of organic liquid transferred and were demonstrating this standard via source testing every 60 months. In addition, staff conducted a review of the most recent source tests and Annual Emission Reporting (AER) site-specific emission factors for Class A facilities and found that all of the vapor recovery systems and/or vapor disposal systems evaluated were less than 0.04 pounds VOC per thousand gallons of organic liquid transferred.



Figure 2.9 - Example of Vapor Disposal System

- *Initial BARCT Emission Limits and Other Considerations*

Based on the technology assessment, staff determined 0.04 pounds VOC per thousand gallons of organic liquid transferred to be the initial BARCT emission limit for vapor recovery systems and/or vapor disposal systems at Class A facilities.

- *Costs and Cost-Effectiveness*

Staff does not foresee costs associated with upgrading control devices as source test data indicates that the 0.04 pounds VOC per thousand gallons of organic liquid transferred emission limit is already achieved in practice at existing facilities, based on review of available source tests and submitted AER site-specific emission factors. However, there are costs associated with updating Title V permits early to incorporate the new VOC limit, which is accounted for in the cost-effectiveness analysis for PAR 462. Rule 3005 – Permit Revisions requires Title V permits to be reopened and revised when regulatory requirements become applicable to a Title V facility with a remaining permit term of three or more years. Title V permit renewals occur every five years. Therefore, staff assumed 60% of Rule 462 Title V facilities will need to submit early Title V revisions to update permit conditions. Individual loading racks and vapor recovery unit permits will also need to be amended to update permit conditions. There are approximately 93 loading racks and 29 vapor recovery units located at Rule 462 Title V facilities.

Staff assumed a ~~change of condition fee to be a facility permit revision fee of \$2,039.77~~^{\$4,128.02} per facility permit and an individual equipment Schedule E change of condition fee of \$10,676.85 per equipment permit based on Rule 301 – Permitting and Associated Fees. Since there are 18 Class A facilities that would require Title V permit modifications (2 facilities already have VOC emission limits below 0.04 pounds VOC per thousand gallons of organic liquid transferred), 60% of those facilities would amount to approximately 11 affected facilities and the number of units located at those facilities would amount to approximately 56 loading racks and 18 vapor recovery units. ~~Permitting Total permit costs for the estimated 11 Class A facilities needing Title V facility permit revisions are approximately \$45,400~~^{\$22,400} and ~~permitting costs for the estimated 74 units needing a permit change of condition are approximately \$790,100.~~ Total permitting costs for PAR 462 is estimated to be \$812,500.

FACILITY LEAK THRESHOLD

Currently, Rule 462 defines a facility vapor leak limit as greater than 3,000 ppm VOC. Staff considered reducing the vapor leak limit but found that Rule 462 is the most stringent leak standard for organic liquid loading facilities as compared to SJVAPCD (10,000 ppm), Bay Area AQMD (3,000 ppm), and U.S. EPA (10,000 ppm). Additionally, after conducting site visits there was no new technology observed that would allow for a lower vapor leak limit. A review of online research did not produce results in finding new technology that could allow a further reduction of the vapor leak limit. Based on the technology assessment staff is not proposing changes to the facility vapor leak limit.

BARCT EMISSION LIMITS

Based on the BARCT assessment, staff proposes monthly OGI inspections and reducing the VOC emission limit for vapor recovery systems and/or vapor disposal systems at Class A facilities to 0.04 pounds VOC per thousand gallons of organic liquid transferred.

CHAPTER 3: SUMMARY OF PROPOSALS

INTRODUCTION

PROPOSED AMENDED RULE STRUCTURE

PROPOSED AMENDED RULE 462

INTRODUCTION

PAR 462 adds OGI inspection requirements for organic liquid loading facilities, requires periodic source testing, and tightens emission standards on vapor control systems. PAR 462 also includes an ozone contingency measure to comply with federal requirements.

The following information describes the structure of PAR 462 and explains the provisions incorporated from other source-specific rules. New provisions and any modifications to provisions that have been incorporated are also explained. PAR 462 also includes grammatical and editorial changes for clarity.

PROPOSED AMENDED RULE STRUCTURE

PAR 462 will contain the following subdivisions:

- (a) Purpose
- (b) Applicability
- (c) Definitions
- (d) Requirements
- (e) Compliance Schedule
- (f) Compliance Determination/Test Methods
- (g) Recordkeeping Requirements
- (h) Distribution of Responsibilities
- (i) Ozone Contingency Measure
- (j) Exemptions

PROPOSED AMENDED RULE 462

Subdivision (a) *Purpose*

The purpose of this rule is expanded to establish contingency measures to fulfill federal requirements.

Subdivision (b) *Applicability*

The applicability of this rule has been reordered from subdivision (c) to subdivision (b) to align with current South Coast AQMD rule structure conventions. Additional language was added to ensure subdivision (i) - Ozone Contingency Measure is applicable upon approval by U.S. EPA.

Subdivision (c) *Definitions*

This subdivision has been reordered from subdivision (b) to subdivision (c) to align with current South Coast AQMD rule structure convention. Several definitions were added, deleted, or substantially modified for clarity and consistency. Key definition changes are discussed below:

- *Background* – updated to remove inaccurate references no longer present in reference method.
- *Contingency Measure* – added to implement federal requirements.

-
- *Coupler* – added to provide clarity for new residual liquid definition. At two site visits, operators stated that occasionally couplers would contain residual liquid that would be detected by VOC analyzers. Operators expressed concern that South Coast AQMD personnel were inconsistent when allowing removal of residual liquid from the coupler. This definition was added to fully describe which component is allowed to be retested.
 - *Inaccessible Component* – added due to a request from a facility stakeholder and to align with South Coast AQMD Rule 1173 that has this definition and similar inspection requirements.
 - *Optical Gas Imaging (OGI) Device* – added to implement OGI inspection requirements. This definition is consistent with other recent South Coast AQMD rules that require OGI inspection, such as Rules 1178, 463, 1148.1, and 1173. Additionally, research found that OGI cameras that operate within the 3.2 – 3.4 micrometer waveband can detect gas leaks by utilizing a special filter that only allows infrared radiation within this narrow wavelength range.
 - *Organic Liquid* – added the word ‘true’ to vapor pressure for clarity as to what type of vapor pressure this rule is referring to, and also for harmonization with storage tank Rules 463 and 1178 that reference true vapor pressure, as the organic liquid that is loaded is typically stored in storage tanks where either Rule 463 or 1178 applies.
 - *Residual Liquid* – added to increase clarity and remove ambiguity during South Coast AQMD compliance inspections. After an organic liquid loading event, the liquid product line is disconnected at a coupler. The coupler may have de minimis quantities of organic liquid left as a result of the disconnection and may be detected by an analyzer using U.S. EPA Method 21 or an OGI device. PAR 462 will allow owners or operators the option to remove residual liquid once upon detection before a retest by South Coast AQMD personnel using U.S. EPA Method 21 or an OGI device, as applicable.
 - *Transfer Equipment* – updated to increase clarity that transfer equipment is the entire organic liquid pathway from any storage tanks to the transporting vessel and the returning vapor pathway.
 - *True Vapor Pressure* – added to provide clarity as to what type of vapor pressure this rule is referring to and also to be consistent with the organic liquids that originate from storage tanks that fall under Rule 463 and/or 1178 that also have the same definition.
 - *Visible Vapors* – added to implement OGI inspection requirements.

Subdivision (d) *Requirements*

PAR 462 includes several provisions to further reduce VOC emissions. For Class A facilities, the emission standard for vapor recovery systems and vapor disposal systems is lowered from the existing 0.08 pounds VOC per thousand gallons (10 grams per 1,000 liters) organic liquid transferred standard to a new 0.04 pounds VOC per thousand gallons (5 grams per 1,000 liters) organic liquid transferred standard as described in subparagraph (d)(1)(D). Research conducted by reviewing source tests and conducting site visits found that Class A facilities will be able to meet the new proposed emission limit of 0.04 pounds VOC per thousand gallons (5 grams per 1,000 liters) organic liquid transferred without having perform any control equipment modifications.

Staff received feedback from a stakeholder that while they are meeting the current VOC limit of 0.08 pounds per thousand gallons over a 15-minute average, they would have difficulty in meeting the proposed VOC limit of 0.04 pounds per thousand gallons over the same a 15-minute average. Stakeholder data showed a number of 15-minute average values above the proposed VOC limit, which may cause brief pauses/shutdowns of their bulk loading operations. These vapor recovery systems typically operate on a 15-minute cycle where one carbon bed is adsorbing while the other carbon bed is regenerating. The proposed rule does not specify the averaging time to be used as that was determined during the previous review of the CMS plans for each facility. Previous CMS plans have prescribed a 15-minute averaging time to demonstrate compliance with the current mass limit of 0.08 pounds per thousand gallons. However, with the lower mass limit of and a longer averaging time may be needed to minimize potential shutdowns if the VOC limit is reduced to 0.04 pounds per thousand gallons, a longer averaging time could be considered to account for potential spikes in the outlet VOC concentration while meeting a lower limit. It should be noted that spiking data can be a beneficial indicator that action on the equipment might be needed. Under the proposed rule, facilities will submit permit applications to modify the permit and CMS plans to add a new concentration limit, which will be calculated based on a facility's operating parameters that equates to the proposed lower mass limit. At that time, a facility may request averaging times longer than 15-minutes and provide the data and justification. Facilities may need to resubmit CMS Plans as needed to minimize potential shutdowns. Depending on the facility's operation and specific vapor control system, longer averaging times might be necessary and warranted, and staff is committed to review the request and ensure the appropriate averaging time, which could range from 15 minutes to 3 hours, is applied for each facility based on their configuration and ensuring that the CMS is operating as intended. To allow for additional time for facilities to submit an updated CMS plan and/or data and for review of that data, the 0.04 pounds VOC per thousand gallons organic liquid transferred standard will become effective upon CMS plan approval, or on February 1, 2027, whichever is earlier. This new 0.04 pounds VOC per thousand gallons limit will replace the existing 0.08 pounds VOC per thousand gallons limit. The For those facilities that can already meet the new 0.04 pounds VOC per thousand gallons with their existing CMS plans will be subject to that new 0.04 pounds VOC per thousand gallons limit upon rule amendment.

Class A facilities will also be required to demonstrate this lower emission standard every 60 months by source testing as described in subparagraph (d)(1)(D). Staff found that for those Class A facility permits reviewed, periodic source test requirements are already required. PAR 462 includes a 60-month periodic source testing requirement to reflect existing permit requirements and to ensure periodic source testing for any new Class A facilities.

Subparagraphs (d)(1)(G) and (d)(2)(F) require transfer equipment to be operated and maintained without visible vapors. The compliance mechanism to determine if there are visible vapors is an OGI inspection.

Staff detected an inconsistency for backpressure requirements for Class B facilities, found in subparagraph (d)(2)(C). This requirement should apply to both vapor recovery systems as well as vapor disposal systems and rule language has been updated.

Subparagraph (d)(6)(A) adds monthly OGI inspection requirements for Class A and B facilities to the existing monthly sight, sound, and smell and quarterly organic vapor analyzer inspection requirements. This new requirement will be effective on August 1, 2026.

Subparagraph (d)(6)(B) includes a minor revision, changing “repaired or replaced within 72 hours” to “repaired or replaced within 3 calendar days.” This change was made for consistency with other rules, and after a request was made by a stakeholder.

Subparagraphs (d)(7)(A) and (d)(7)(B) require the owner or operator of the OGI device to be trained to operate and maintain the device in accordance with manufacturer’s specifications. In lieu of an OGI inspection, an alternative inspection method may be used if approved by U.S. EPA and the Executive Officer as described in subparagraph (d)(7)(C). Other agencies, such as the state of Colorado Department of Public Health & Environment (CDPHE), have several U.S. EPA approved alternative inspection methods. CDPHE’s alternative inspection methods are referred to as an Alternative Approved Instrument Monitoring Method¹⁰ and are used by oil and gas facilities in that jurisdiction. If an alternative inspection method is approved by U.S. EPA, it may also be used in South Coast AQMD jurisdiction if approved by the Executive Officer.

Subdivision (d) also includes additional guidance regarding procedures during inspection by South Coast AQMD personnel. As referenced earlier in subdivision (c), subparagraph (d)(8)(A) standardizes retesting of couplers when residual liquid is present. The owners or operators have the option to remove residual liquid from the coupler by wiping, using compressed air, application of cotton swabs, or other means and retest if VOC is detected during a first test. The removal of residual liquid should be prompt, such as within one minute of detection of VOC by OVA or OGI device, or within another acceptable timeframe determined by South Coast AQMD personnel. The intent of subparagraph (d)(8)(A) is to allow an owner or operator to remove de minimis amounts of residual liquid prior to compliance determination by South Coast AQMD personnel, however, the removal of residual liquid cannot unduly delay a compliance inspection.

Visible vapors, if detected by South Coast AQMD personnel, are subject to Notice of Violation. However, as described in subparagraph (d)(8)(B), facility owners or operators may challenge a detected visible vapor by using an analyzer in accordance with U.S. EPA Method 21. If the visible vapor does not meet the definition of a facility vapor leak, defined as 3,000 ppm, a Notice of Violation is not appropriate. Additionally, for any inaccessible component found, the owner or operator would have one (1) calendar day to demonstrate that the visible vapors are not a facility vapor leak.

Subdivision (e) *Compliance Schedule*

PAR 462 updates this subdivision by removing obsolete rule language with past compliance dates. Staff also added rule language to clarify that sending the 30-day written request for CARB

¹⁰ <https://cdphe.colorado.gov/oil-and-gas-compliance-and-recordkeeping/approvedinstrument-monitoring-method-aimm-for-oil-gas>

certification of new or modified vapor recovery system and/or vapor disposal system is only required if obligated under Health and Safety Code section 41954.¹¹

New subparagraph (e)(1)(C) adds a deadline for facilities to submit amendments to their permits for the VOC limit change to 0.04 pounds per thousand gallons organic liquid transferred. This takes into account both Title V and non-Title V facilities.

New subparagraph (e)(1)(D) clarifies that any new or modified Continuous Monitoring System (CMS) requires a CMS Plan to be submitted and approved ~~prior to operation~~ by February 1, 2026, preventing any CMS from operating without an approved CMS plan.

Subdivision (f) *Compliance Determination/Test Methods*

This subdivision now includes paragraph (f)(8) that details source testing procedures, including submitting source test protocols, complying with the approved terms of a source test protocol, and submission of source testing reports. These source test requirements were based on source test requirements in Rule 1405 – Control of Ethylene Oxide Emissions from Sterilization and Related Operations (Rule 1405). Rule 1405 was recently amended in December 2023. Paragraph (f)(8) also includes deadlines for those facilities that have not already been doing periodic source testing to submit their source test protocols and perform the source test itself.

Paragraph (f)(9) was added to specify the test method for determining true vapor pressure.

Subdivision (g) *Recordkeeping Requirements*

Formerly entitled Recordkeeping, subdivision (g) is expanded to include records of OGI inspections and also now requires five (5) years of records to be maintained for major sources, known as Title V facilities. Title V facilities have permits that are valid for five years before a permit renewal is required and contain some of the most stringent recordkeeping requirements, including record retention for five years.

Subdivision (h) *Distribution of Responsibilities*

PAR 462 expands the scope of subdivision (h) to assign responsibility of OGI inspections and source testing to the owner and operator of an organic liquid loading facility.

Subdivision (i) *Ozone Contingency Measure*

To comply with federal requirements, subdivision (i) was added. This contingency measure would only be implemented in the event that the U.S. EPA determines that the ~~South Coast AQMD Coachella Valley area~~ has failed to meet a reasonable further progress (RFP) milestone or to attain an ozone NAAQS, after amendments to Rule 462 are approved by U.S. EPA to be included into the SIP. This contingency control measure is necessary as part of comprehensive efforts to timely attain ozone standards.

¹¹ For additional information regarding CARB certification of vapor recovery for gasoline bulk plants and terminals please refer to: <https://ww2.arb.ca.gov/vapor-recovery-bulk-plants-and-terminals>

Contingency measures should provide for emission reductions approximately equivalent to either one year's worth of air quality improvement or one year's worth (OYW) of reductions needed for RFP in the years following RFP milestone and attainment years. While the proposed amendments in Rule 462 satisfy a 'triggering mechanism' requirement set by the U.S. EPA, the reductions from the rule alone are not adequate to satisfy the OYW of progress, which is calculated as the percentage of the base year emission inventory (EI) the annual rate of reductions represents of either NOx or VOC (or combined) per year. See the equation below for an example.

$$\frac{(\text{base year EI} - \text{attainment year EI})}{(\text{attainment year} - \text{base year})} \div \text{base year EI} \times \text{attainment year EI} = \text{OYW of Progress}$$

Contingency measures are required to result in emission reductions within one year of a final action by the U.S. EPA. It would be challenging to implement more stringent requirements, achieving additional NOx or VOC reductions, in rules involving other traditional sources within the mandated one-year time period. Retrofit or replacement of existing equipment with newer technologies or equipment, or any revisions to permit provisions would likely take more than one year to effectively implement. Conversely, the proposed amendments to Rule 462 to implement OGI inspections do not require permitting of units, do not require units be retrofitted or replaced, and do not require reformulation or development of new products. Consequently, Rule 462 is well suited for contingency provisions as implementing lower leak standards or higher frequency OGI monitoring could be implemented in less than 60 days following the triggering of a contingency measure with resulting emission reductions occurring in less than one year.

Based on the above analysis, South Coast AQMD will satisfy the contingency requirements set forth in CAA section 172(c)(9) and in the U.S. EPA's Ozone Implementation Rule with these proposed amendments to Rule 462. PAR 462 provides a contingency measure to be triggered if the Coachella Valley Area fails to meet RFP or attain the applicable ozone standards by the applicable date. The facilities that would be affected by this contingency measure are located throughout South Coast AQMD's jurisdiction, with a majority of them located outside of the Coachella Valley area. The contingency measure requires emission reductions from all affected facilities, located both within and outside of the Coachella Valley area. The emission reductions anticipated from PAR 462, in conjunction with reductions from existing rules and regulations, are expected to achieve the reductions equivalent to or greater than OYW of progress. PAR 462 addresses the contingency measures for RFP and attainment for the applicable ozone standards (2008 & 2015 8-hour ozone NAAQS).

Subdivision (j) *Exemptions*

Paragraph (j)(1) updates the existing exemption from Notice of Violation to include visible vapors detected by the owner or operator during a self-inspection. The exemption only applies if equipment is repaired or replaced within 3 calendar days pursuant to subparagraph (d)(6)(B).

Paragraph (j)(3) was added to exempt Class C facilities from the monthly OGI inspection requirement. Monthly sight, sound, and smell inspection requirements as well as quarterly OVA inspection requirements remain in effect.

Paragraph (j)(4) was added to exempt Rules 466 and 466.1 both to avoid duplicate inspections and due to those two rules' less stringent leak thresholds of 10,000 PPM relative to Rule 462's leak threshold of 3,000 PPM.

Paragraph (j)(5) was added to exempt equipment that is already subject to Rule 1173 to prevent duplicative monitoring efforts.

CHAPTER 4: IMPACT ASSESSMENTS

INTRODUCTION

EMISSION REDUCTIONS

COST-EFFECTIVENESS

INCREMENTAL COST-EFFECTIVENESS

SOCIOECONOMIC IMPACT ASSESSMENT

CALIFORNIA ENVIRONMENTAL QUALITY ACT ANALYSIS

DRAFT FINDINGS UNDER HEALTH AND SAFETY

CODE SECTION 40727

COMPARATIVE ANALYSIS

INTRODUCTION

Impact assessments were conducted as part of the PAR 462 rule development to assess the environmental and socioeconomic implications. These impact assessments include emission reduction calculations, cost-effectiveness and incremental cost-effectiveness analyses, a socioeconomic impact assessment, and a California Environmental Quality Act (CEQA) analysis. Staff prepared draft findings and performed a comparative analysis pursuant to Health and Safety Code Sections 40727 and 40727.2, respectively.

EMISSION REDUCTIONS

PAR 462 will establish more stringent control and monitoring requirements at organic liquid loading sites that will result in emission reductions.

Reduction of VOCs for Vapor Recovery Systems and Vapor Disposal Systems

The current emission limit for vapor recovery and vapor disposal systems is 0.08 pounds VOC per thousand gallons of organic liquid transferred. As noted in Chapter 1, there are 20 Class A facilities in South Coast AQMD. Throughput data obtained during facility site visits and AER data revealed that the total throughput from all Class A facilities is approximately 5,525,600,000 gallons of organic liquid transferred per year. The average annual throughput is 276,300,000 gallons from each Class A facility, with an average of 757,000 gallons of organic liquid transferred per day per facility.

The baseline emissions at 0.08 pounds VOC per thousand gallons of organic liquid transferred at the 20 Class A facilities with a daily throughput of 757,000 gallons are calculated as follows:

$$0.08 / 1,000 \times 20 \times 757,000 = 1,211 \text{ pounds VOC/day}$$
$$1,211 / 2,000 = 0.61 \text{ tons VOC/day}$$

Reducing the emission limit to 0.04 pounds VOC per thousand gallons of organic liquid transferred is expected to reduce VOC emissions by 50% or 0.30 tons VOC/day. As noted earlier, all units reviewed are already meeting this emission limit. Therefore, these emission reductions are not included in the cost-effectiveness analysis. However, the emission reductions associated with a lower emission limit can still be claimed for SIP credit.

OGI Monitoring

Staff is proposing the monthly use of OGI as a tool to identify leaks from equipment regulated by this rule. While OGI devices are not as sensitive as OVA at detecting smaller leaks, larger leaks can be discovered and repaired sooner than through current inspection frequencies and techniques. Staff assumed five major leaks per year based on the average number of leaks identified over the last five years by South Coast AQMD personnel. During the September 2023 amendment to Rule 1178¹², staff determined that leaks from storage tanks contribute 8,000 pounds of VOC per day per leak. While VOC storage tanks and organic liquid loading share common products and are often connected together, the leak rate from storage tanks is different than the leak rate from organic liquid loading facilities. Staff adjusted the leak rate used for PAR 462 to be 97.5% lower than the leak rate used in the September 2023 amendment to Rule 1178, or just 2.5% of the storage tank leak rate. Staff calculated that 2.5% of the 8,000 pounds VOC per day per leak rate used for storage tanks is 200 pounds of VOC per day per leak, which was the VOC leak rate assumed for PAR 462. A leak rate of 200 pounds VOC/day is also consistent with the leak rate used in the 2024 rulemaking for Rule 1148.1.

Based on the current quarterly inspection frequency, staff assumed that an undiscovered leak occurs at a midpoint between inspections, occurring at 45 days. If the inspection frequency is increased to monthly, then staff assumes that an undiscovered leak occurs at a midpoint of 15 days. Comparing the current quarterly inspection frequency using the OVA to the proposed monthly frequency using OGI equipment, staff predicts that a potential leak may be discovered and repaired approximately 30 days sooner, a difference between 45 and 15 days. While there is an optional monthly inspection using sight, sound, and smell, that inspection option is more subjective than using an OGI device and would not monitor certain parts of the product or vapor pathways, such as elevated pipe runs that are at a considerable distance from ground level.

To establish baseline emissions, staff performed the following calculation:

- Five leaks per year from the 51 affected facilities (after excluding the two Class C facilities)
- A leak rate of 200 lbs/day of VOC
- 45 days before a leak is identified
- Calculation – $(5 \text{ leaks/yr}) \times (200 \text{ lbs VOC/day}) \times (45 \text{ days}) \times (1 \text{ yr}/365 \text{ day}) \times (1 \text{ ton}/2000 \text{ lb}) = 0.06 \text{ ton VOC/day}$

Using these assumptions, staff estimates baseline emissions of 0.06 ton per day of VOC.

With monthly OGI inspections, staff anticipates a reduction in VOC emissions compared to the baseline. To determine the emission reductions, staff performed the following calculation:

¹² South Coast AQMD Rule 1178 – Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities: <https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1178/par-1178-draft-staff-report--final.pdf>, p. 4-2, accessed on February 27, 2025.

- Five leaks per year from the 51 affected facilities (after excluding the two Class C facilities)
- A leak rate of 200 lbs/day of VOC
- Discovery of a leak 30 days sooner
- Calculation – (5 leaks/yr) x (200 lbs VOC/day) x (30 days) x (1 yr/365 day) x (1 ton/2000 lbs) = 0.04 ton VOC/day

Using these assumptions, staff estimates emission reductions of 0.04 ton per day of VOC from monthly OGI inspections.

COST-EFFECTIVENESS

Health and Safety Code Section 40920.6 requires a cost-effectiveness analysis when establishing BARCT requirements. The cost-effectiveness of a potential emission control option is measured in terms of the control cost in dollars per ton of air pollutant reduced. The costs for the control technology include purchasing, installation, operation, maintenance, and permitting. Emission reductions are calculated for each requirement and based on estimated baseline emissions. The 2022 AQMP established a cost-effectiveness threshold of \$36,000 per ton of VOC reduced, adjusted annually for inflation to 2024 dollars: is \$41,400 per ton in 2024. A cost-effectiveness that is greater than the threshold of ~~\$36,000~~\$41,400 per ton of VOC reduced requires additional analysis and a hearing before the Governing Board regarding costs.

The cost-effectiveness is estimated based on the present value of the cost, which are calculated according to the capital cost (initial one-time equipment and installation costs) plus the annual operating cost (recurring expenses over the useful life of the equipment multiplied by a present worth factor).

$$\text{Cost-Effectiveness (CE)} = \text{Present Worth Value (PWV)} / \text{Emission Reduction (ER)}$$

$$\text{PWV} = \text{Total Install Cost (TIC)} + \text{Present Worth Factor (PWF)} \times \text{Annual Cost (AC)}$$

$$\text{Present Worth Factor (PWF)} = \left(1 - \frac{1}{(1+r)^n}\right) / r$$

- Interest rate (r)
- Life of equipment (n)

Capital costs are one-time costs, such as equipment purchase and/or installation costs. Annual costs are any recurring costs required to operate equipment. Costs were obtained for OGI monitoring.

OGI Monitoring

Costs for OGI cameras were obtained from vendors and facilities. Capital costs for OGI cameras was conservative, as some organic liquid loading companies already purchased an OGI camera due to OGI inspection requirements in Rules 1178 and 463. Staff was able to obtain further cost information such as maintenance and labor from owners and operators as well as OGI equipment vendors. In addition, South Coast AQMD retains OGI cameras, and training and maintenance cost information was available.

The following information was used to calculate the cost-effectiveness of purchasing and using an OGI camera:

- Approximately 51 organic liquid loading facilities (after excluding the two Class C facilities)
- Cost of an OGI camera = \$120,000 with a 10-year life span
- 20 cameras assumed to be needed based on one per company, approximately 20 companies represent the 51 facilities
- Annual maintenance = \$1000
- Training = \$1,000 every two years (\$500 per year)
- In-House labor = 1 person working 8 hours/day at \$50/hr = \$400/day
- Monthly inspections = 12/year
- Emission reductions = 0.04 tpd VOC

- $PWF = 8.111$ for a 10-year life expectancy at 4% interest rate
- $TIC = \$120,000 \times 20 \text{ cameras} = \$2,400,000$
- $AC = (\$1000 [\text{maintenance}] + \$500 [\text{training}]) \times 20 \text{ cameras} + (1 \text{ person} \times 8 \text{ hr/day} \times \$50/\text{hr} \times 12 \text{ inspections/yr} \times 51 \text{ facilities}) [\text{labor}] = \$274,800$ for 20 cameras
- $PWV = \$2,400,000 + 8.111 \times \$274,800 = \$4,628,902$
- $ER = (0.04 \text{ tpd VOC}) \times (365 \text{ day/yr}) \times (10 \text{ years}) = 146 \text{ tons VOC}$
- $CE = \$4,628,902 / 146 \text{ tons VOC reduced} = \$31,700/\text{ton VOC reduced}$

The cost-effectiveness for requiring monthly inspections using OGI cameras is calculated to be \$31,700/ton VOC reduced.

| Table 4-1 – Summary of Cost-Effectiveness | | | | |
|---|---|---------------------------------------|--|--------------------------------------|
| Proposed Requirement | Cost Over 10 Years | Annualized Cost | Annual Emission Reductions (tons/year) | Cost-Effectiveness (\$/ton) |
| Monthly OGI | \$4,628,902 | \$462,890 | 14.6 | \$31,700 |
| More Stringent Vapor Recovery Emission Standard (Title V Permit Revision) | \$45,400 <u>\$812,500</u> | \$4,540 <u>\$81,250</u> | 0 | N/A |
| 5-Year Source Test | \$80,000 | \$8,000 | N/A | N/A |
| Overall | \$4,754,302 <u>\$5,521,402</u> | \$475,430 <u>\$552,140</u> | 14.6 | \$32,600 <u>\$37,800*</u> |

*The overall rule cost-effectiveness includes the Title V permit revision costs associated with reducing the VOC limit for vapor recovery systems. Staff did not include the emission reductions from reducing the VOC limit of vapor control systems as part of the cost-effectiveness analysis as it is assumed facilities are already meeting the proposed standard. As such, the emission reductions are not included in the cost-effectiveness analysis, however, the emission reductions are being submitted for SIP credit.

Staff identified two Class A facilities that were not already conducting periodic source testing and obtained source testing quotes with an average cost of \$20,000 per test. With two known facilities, the cost over 10 years is \$80,000.

Since the public workshop took place on April 2, 2025, a comment was received by an operator that requested to be exempt from OGI monitoring for his Class C bulk loading operation. Staff reviewed the facility's permit and noted a monthly throughput limit of 15,000 gallons per month of gasoline. A cost-effectiveness study was done based on the permit throughput limit, and on an assumption that there are two active facilities that fall under Class C status. Below is the cost-effectiveness analysis conducted for these two Class C facilities:

- 2 known Class C facilities, 15,000 gal/month x 12 months = 180,000 gal
- 180,000 gal x 2 facilities = 360,000 gal/year throughput for 2 facilities
- 5,525,599,023 gallons is estimated total annual throughput of all Class A facilities

- $(360,000 \text{ gal/year}) / (5,525,599,023 \text{ gal/year}) = 0.000065 = 0.0065\%$ is throughput difference of the two Class C facilities compared to all Class A facilities
- 14.6 tons/year is expected annual emission reductions
- $0.000065 \times 14.6 = 0.001 \text{ tons/year} = 2 \text{ lbs VOC per year}$
- 20 cameras for 20 companies with maintenance and other costs is estimated to be \$4,628,902 over 10 years
- The number of Class C facilities is 10% of the number of Class A, and 10% of \$4,628,902 is \$462,890 over 10 years
- For the two companies the cost per year is \$46,289
- $CE = \$46,289 / 0.001 \text{ tons/year} = \$46,289,000 \text{ per ton of VOC}$

For Class C facilities, it would not be cost-effective to conduct monthly OGI inspections and therefore PAR 462 will provide an exemption from monthly OGI inspection requirements for those facilities.

INCREMENTAL COST-EFFECTIVENESS

Health and Safety Code Section 40920.6 requires an incremental cost-effectiveness analysis for BARCT rules or emission reduction strategies when there is more than one control option which would achieve the emission reduction objective of the proposed amendments, relative to ozone, CO, SO_x, NO_x, and their precursors. Since volatile organic compounds are precursors to ozone, an incremental cost-effectiveness analysis is required for controls proposed to limit VOC emissions. Incremental cost-effectiveness is the difference in the dollar costs divided by the difference in the emission reduction potentials between each progressively more stringent potential control option as compared to the next less expensive control option.

Incremental cost-effectiveness is calculated as following:

$$\text{Incremental Cost-Effectiveness} = \frac{\text{Cost of Option 2} - \text{Cost of Option 1}}{\text{Benefit of Option 2} - \text{Benefit of Option 1}}$$

Incremental Cost-Effectiveness for OGI Inspections

Staff conducted an incremental cost-effectiveness for OGI inspections, with Option 1 being monthly OGI monitoring and Option 2 being every two weeks OGI monitoring (26 inspections per year):

$$\text{Incremental Cost-Effectiveness} = \frac{\$6,702,100 - \$4,628,900}{182.5 \text{ tons} - 146 \text{ tons}}$$

The incremental cost-effectiveness of conducting OGI inspections every two weeks compared to monthly is calculated to be \$56,800 per ton of VOC reduced.

Staff found that it was not incrementally cost-effective to conduct OGI inspections every two weeks and is therefore proposing monthly OGI inspections. As previously noted, OGI inspections would be required every two weeks if and when contingency measures are triggered.

SOCIOECONOMIC IMPACT ASSESSMENT

On March 17, 1989, the South Coast Air Quality Management District (South Coast AQMD) Governing Board adopted a resolution which requires an analysis of the economic impacts associated with adopting and amending rules and regulations. In addition, Health and Safety Code Sections 40440.8 and 40728.5 require a socioeconomic impact assessment for proposed and amended rules resulting in significant impacts to air quality or emission limitations. Thus, this Socioeconomic Impact Assessment has been prepared in accordance with Health and Safety Code and South Coast AQMD Governing Board requirements. The type of industries or businesses affected, and the range of probable costs, are addressed in this chapter. Additional information and analysis on the availability and cost-effectiveness of other technologies considered for the BARCT assessment, discussion of potential emission reductions, and the necessity of amending the rule are included elsewhere in this report.

Introduction

PAR 462 is designed to implement the 2022 AQMP Control Measure FUG-01 – Improved Leak Detection and Repair. The objective of PAR 462 is to further reduce VOC emissions from organic liquid loading. Specifically, PAR 462 would require: 1) monthly OGI inspections; 2) periodic source testing for all Class A facilities' vapor control systems; and 3) updating Title V facility and equipment permits early to incorporate reduced VOC limits for vapor control systems. Additionally, PAR 462 will introduce a contingency measure to partially satisfy federal Clean Air Act contingency requirements for applicable ozone National Ambient Air Quality Standards (NAAQS) in the South Coast AQMD's jurisdiction.

Legislative Mandates

The legal mandates directly related to the socioeconomic impact assessment of PAR 462 include South Coast AQMD Governing Board resolutions and various sections of the Health and Safety Code.

South Coast AQMD Governing Board Resolution

On March 17, 1989, the South Coast AQMD Governing Board adopted a resolution that requires an analysis of the economic impacts associated with adopting and amending rules and regulations that considers all of the following elements:

- Affected industries;
- Range of probable costs;
- Cost-effectiveness of control alternatives; and
- Public health benefits.

Health and Safety Code Requirements

The state legislature adopted legislation which reinforces and expands the South Coast AQMD Governing Board resolution requiring socioeconomic impact assessments for rule development projects. Health and Safety Code Section 40440.8, ~~which went into effect on January 1, 1991,~~ requires a socioeconomic impact assessment for any proposed rule, rule amendment, or rule repeal which "will significantly affect air quality or emissions limitations."

To satisfy the requirements in Health and Safety Code Section 40440.8, the scope of the socioeconomic impact assessment should include all of the following information:

- Type of affected industries;
- Impact on employment and the regional economy;
- Range of probable costs, including those to industry;
- Availability and cost-effectiveness of alternatives to the rule;
- Emission reduction potential; and
- Necessity of adopting, amending, or repealing the rule in order to attain state and federal ambient air quality standards.

However, job impact analyses are not conducted for projects with annual costs below one million U.S. dollars, as the modeling tool is unable to accurately assess macroeconomic effects that are minimal in scale compared to the broader economic forecast.

Health and Safety Code Section 40728.5, ~~which went into effect on January 1, 1992,~~ requires the South Coast AQMD Governing Board to: 1) actively consider the socioeconomic impacts of regulations; 2) make a good faith effort to minimize adverse socioeconomic impacts; and 3) include small business impacts. To satisfy the requirements in Health and Safety Code Section 40728.5, the socioeconomic impact assessment should include the following information:

- Type of industries or business affected, including small businesses; and
- Range of probable costs, including costs to industry or business, including small business.

Finally, Health and Safety Code Section 40920.6, ~~which went into effect on January 1, 1996,~~ requires an incremental cost-effectiveness analysis for a proposed rule or amendment which imposes Best Available Retrofit Control Technology (BARCT) or "all feasible measures" requirements relating to emissions of ozone, CO, SO_x, NO_x, VOC, and their precursors. A cost-effectiveness analysis was conducted for PAR 462 and can be found in Chapter 4 of this Staff Report.

Affected Facilities and Industries

PAR 462 is applicable to approximately 53 facilities located within the South Coast AQMD jurisdiction, with 26 facilities in Los Angeles County, 13 facilities in San Bernardino County, seven facilities in Riverside County, and seven facilities in Orange County. Table 4-2 presents the distribution of the affected facilities across various industrial sectors under the North American Industrial Classification System (NAICS). As summarized in the table, the majority of the affected facilities are in the Wholesale Trade sector (51 percent), followed by the Utilities sector (30 percent), and the Support Activities for Transportation sector (8 percent).

Table 4-2
Distribution of PAR 462 Affected Facilities across NAICS Sectors

| Industry Sector | NAICS Code | Number of Facilities | Percentage of Facilities |
|--|------------|----------------------|--------------------------|
| Wholesale Trade | 42 | 27 | 51% |
| Utilities | 22 | 16 | 30% |
| Scenic and sightseeing transportation; Support activities for transportation | 487-488 | 4 | 8% |
| Pipeline Transportation | 486 | 3 | 6% |
| Petroleum and Coal Products Manufacturing | 324 | 3 | 6% |
| Total | | 53 | 100% |

Small Business Analysis

The South Coast AQMD defines a “small business” in Rule 102 for purposes of fees as one which employs 10 or fewer persons and which earns less than \$500,000 in gross annual receipts. The South Coast AQMD also defines “small business” for the purpose of qualifying for access to services from the South Coast AQMD’s Small Business Assistance Office as a business with an annual receipt of \$5 million or less, or with 100 or fewer employees. In addition to the South Coast AQMD’s definition of a small business, the United States (U.S.) Small Business Administration and the federal 1990 Clean Air Act Amendments (1990 CAAA) each have their own definition of a small business.

The 1990 CAAA classifies a business as a “small business stationary source” if it: 1) employs 100 or fewer employees; 2) does not emit more than 10 tons per year of either VOC or NOx; and 3) is a small business as defined by the U.S. Small Business Administration. Based on firm revenue and employee count, the U.S. Small Business Administration definition of a small business varies by six-digit NAICS codes.¹³ The majority of facilities affected by PAR 462 fall within the Petroleum Bulk Stations and Terminals industry (NAICS 424710). According to the U.S. Small Business

¹³ U.S. Small Business Administration, 2023 Small Business Size Standards, <https://www.sba.gov/document/support-table-size-standards>, accessed April 15, 2025.

Administration, businesses in this industry with fewer than 225 employees are classified as small businesses.

South Coast AQMD relies mostly on Dun and Bradstreet data to conduct small business analyses for private companies. In cases where the Dun and Bradstreet data are unavailable or unreliable, other external data sources such as Manta, Hoover, LinkedIn, and company website data will be used. The determination of data reliability is based on data quality confidence codes in the Dun and Bradstreet data as well as staff’s discretion. Revenue and employee data for publicly owned companies are gathered from Securities and Exchange Commission (SEC) filings. Since subsidiaries under the same parent company are interest-dependent, the revenue and employee data of a facility’s parent company will be used for the determination of its small business status.

Employment and revenue estimates from 2024 Dun and Bradstreet data as well as other external sources are available for 52 of the 53 facilities subject to PAR 462. Note that the current data used for this small business analysis represents the most thorough and accurate information obtainable as of the publication date of this draft staff report. The number of affected facilities that qualify as a small business based on each of the four small business definitions is presented in Table 4-3.

Table 4-3: Number of Small Business Based on Various Definitions

| Small Business Definitions | Number of Facilities |
|---|-----------------------------|
| South Coast AQMD Rule 102 | 0 |
| South Coast AQMD Small Business Assistance Office | 7 |
| U.S. Small Business Administration | 9 |
| 1990 CAAA | N/A |

However, a small business analysis based on the 1990 CAAA definition was not conducted because most affected facilities are either not required to submit annual emission reports pursuant to South Coast AQMD Rule 222 – Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II, or the emissions data is missing. Therefore, a facility’s small business status under this definition could not be determined.¹⁴

Compliance Costs

PAR 462 would require a one-time investment in OGI cameras. In addition, 11 Title V facilities would be required to revise update their permits early to reflect a change of condition, which would involve paying—a Facility Permit Amendment/Revision and Equipment Permit Change of

¹⁴ South Coast AQMD, Rule 222 – Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II, <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/Rule-222.pdf>, accessed April 15, 2025.

~~Condition Change of Condition~~ fees. Affected facilities would also face recurring costs for camera operation and maintenance (O&M), labor expenses for conducting OGI inspections, training costs for personnel to use the OGI equipment, and source testing expenses for facilities not already performing such testing. Compliance costs associated with PAR 462 are projected over a 10-year period, from 2026 through 2035, enabling the annualization of camera purchase costs based on their expected 10-year useful life. All costs presented in this Final Socioeconomic Impact Assessment are expressed in 2024 dollars. The estimation methods and assumptions for each cost category are outlined in the following sections.

In practice, many affected facilities already possess OGI cameras due to overlapping inspection requirements in other South Coast AQMD rules such as Rules 463, 1148.1, 1173 and 1178. Additionally, some facilities may opt to contract with third-party providers to conduct OGI inspections instead of purchasing cameras. However, given the uncertainty regarding whether facilities subject to PAR 462 already own cameras or will utilize third-party services, this analysis assumes that the parent company of each affected facility will purchase an OGI camera, incur the associated annual O&M costs, conduct inspections using in-house labor, and cover the cost of required OGI training every two years.

OGI Cameras

PAR 462 requires a monthly OGI inspection to detect leaks from equipment more promptly than what current inspection techniques and frequency provide. OGI cameras can detect vapors from leaking equipment by visualizing a variety of gas wavelengths. Staff determined that monthly OGI inspections would not be cost-effective for two affected Class C facilities; thus, they are not expected to incur related costs. This analysis assumes only 51 of the 53 affected facilities will be subject to OGI-related expenses.¹⁵

Staff identified approximately 20 parent companies for the 51 affected facilities that will be required to perform OGI inspections per PAR 462. Each parent company is assumed to purchase an OGI camera in 2026, the first year of rule compliance, and that OGI cameras will be used to perform leak inspections at all the affected facilities owned by the parent company. According to vendors and affected facilities, each camera will cost approximately \$121,712 and have an anticipated 10-year useful life. The total capital cost attributed to OGI cameras is estimated to be \$2,434,240.

~~Update to Permit Conditions~~ *Permit Revision/Amendment for Title V Affected Facilities*

As part of the implementation of PAR 462, there will be costs associated with updating Title V permits to reflect the proposed VOC emission limit of 0.04 pounds per thousand gallons of organic liquid transferred. Rule 3005 – Permit Revisions requires that Title V permits be reopened and revised when new regulatory requirements apply to a facility with three or more years remaining

¹⁵ For more information regarding the cost-effectiveness analysis for the two affected Class C facilities please see the Cost-Effectiveness section of this report found in Chapter 4.

on its permit term.¹⁶ Title V permits are renewed on a five-year cycle; therefore, staff assumes that approximately 60 percent of PAR 462 Title V facilities will need to submit early permit revisions to update permit conditions, as their renewal periods are still several years away. There are 20 affected Title V facilities in total; however, two of these facilities already have VOC emission limits below 0.04 pounds per thousand gallons of organic liquid transferred and therefore do not require permit modifications. This leaves 18 facilities subject to permit revisions. Staff assumed that approximately 60 percent of these 18 facilities, or approximately 11 facilities, will need to submit early Title V permit revisions. This analysis estimated the Permit Revision/Amendment Change of Condition fee to be ~~\$2,040~~ 4,187 per permit, based on Rule 301 – Permitting and Associated Fees, ~~adjusted to 2024 dollars~~.¹⁷ The total capital cost is estimated to be ~~\$22,440~~ 46,057.

Change of Condition for Title V Affected Facilities

Permits for 56 loading racks and 18 vapor recovery units operating at the 11 Title V facilities will also require revisions to update the permit conditions. According to Rule 301, the Schedule E Change of Condition fee for each permit unit is approximately \$10,677. The total capital cost is estimated to be approximately \$790,098.

OGI Operation & Maintenance (O&M) Costs

OGI cameras would require annual maintenance and calibration to ensure equipment performance. According to feedback from stakeholders, the annual OGI maintenance cost is approximately \$1,014 per camera and is anticipated to begin in 2026 – the year when the OGI cameras are expected to be purchased. The total annual cost of OGI camera maintenance is estimated to be \$20,280 for all 20 cameras.

¹⁶ South Coast AQMD, 2010, Rule 3005 – Permit Revisions, <https://www.aqmd.gov/docs/default-source/rule-book/reg-xxx/rule-3005-permit-revisions.pdf>, accessed July 2025.

¹⁷ South Coast AQMD, 2025, Rule 301 – Permitting and Associated Fees, <https://www.aqmd.gov/docs/default-source/rule-book/reg-iii/rule-301.pdf>, accessed July 2025.

OGI Labor Costs

PAR 462 will require the affected facilities to perform monthly OGI inspections to detect leaks. This analysis assumes that inspections will be conducted by existing employees of the affected facilities at a wage rate of approximately \$51 per hour, based on cost assumptions used in past rulemaking for PAR 1148.1, adjusted to reflect 2024 dollars. Assuming eight hours per workday, 12 inspections per year, and a total of 51 affected facilities ~~20 cameras in operation~~, the total annual inspection cost would be approximately \$249,696 ~~97,920~~.

OGI Training

Training by OGI camera manufacturers is required to ensure proper operation of equipment and is expected to occur every two years at a cost of approximately \$1,014 per trainee, based on estimates from prior rulemaking for PAR 1148.1 and adjusted to reflect 2024 dollars. The analysis assumed that one existing employee at each of the 20 parent companies would receive OGI training, resulting in an estimated total cost of \$20,280 every two years, or an annual average cost of \$10,140.

Periodic Source Testing

PAR 462 will require periodic source testing of vapor control systems at all affected Class A facilities. Staff identified two Class A facilities that are not currently conducting such testing. For these facilities, source testing quotes were obtained, with an average cost of \$20,000 per test. Since testing is required once every five years, this results in an average annual cost of \$8,000 over the analysis period.

Annual Average Compliance Cost

The estimated costs for implementing PAR 462 over the 2026–2035 period include the following components beginning in 2026 and 2027:

- 1) Purchase of OGI Cameras – One-time capital expenditure
- 2) Title V Facilities Permit Amendment/Revision ~~Permit Condition Update~~ Fees - One-time capital expenditure
- 3) Annual O&M Costs for OGI – Recurring each year
- 4) Annual Labor Costs Related to OGI Activities – Recurring each year
- 5) OGI Training Expenses – Conducted every two years
- 6) Source Testing – Conducted every five years
- 7) Title V Facilities Change of Condition Fees – One-time capital expenditure

The total present value of the compliance costs of PAR 462 are estimated to be \$6.35 ~~4.47~~-million and \$5.43 ~~3.83~~-million with a 1 percent and 4 percent discount rate, respectively. The average

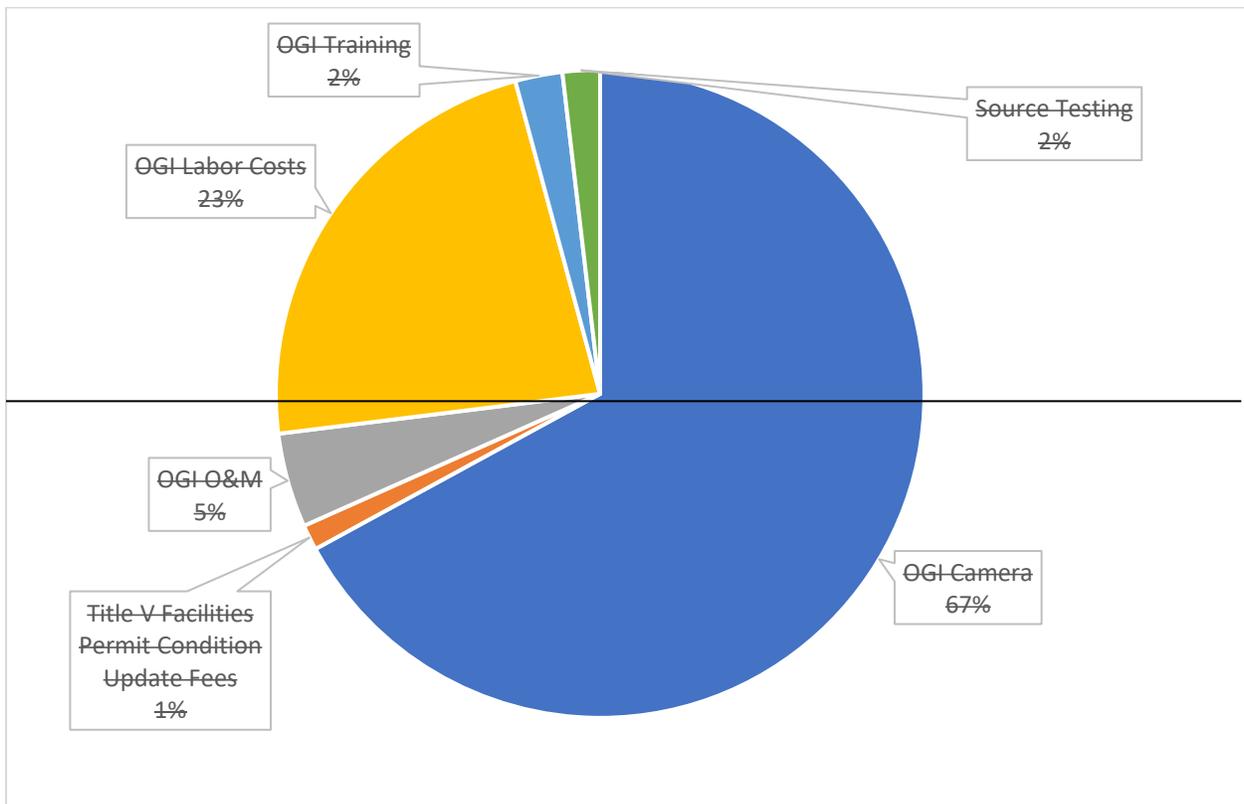
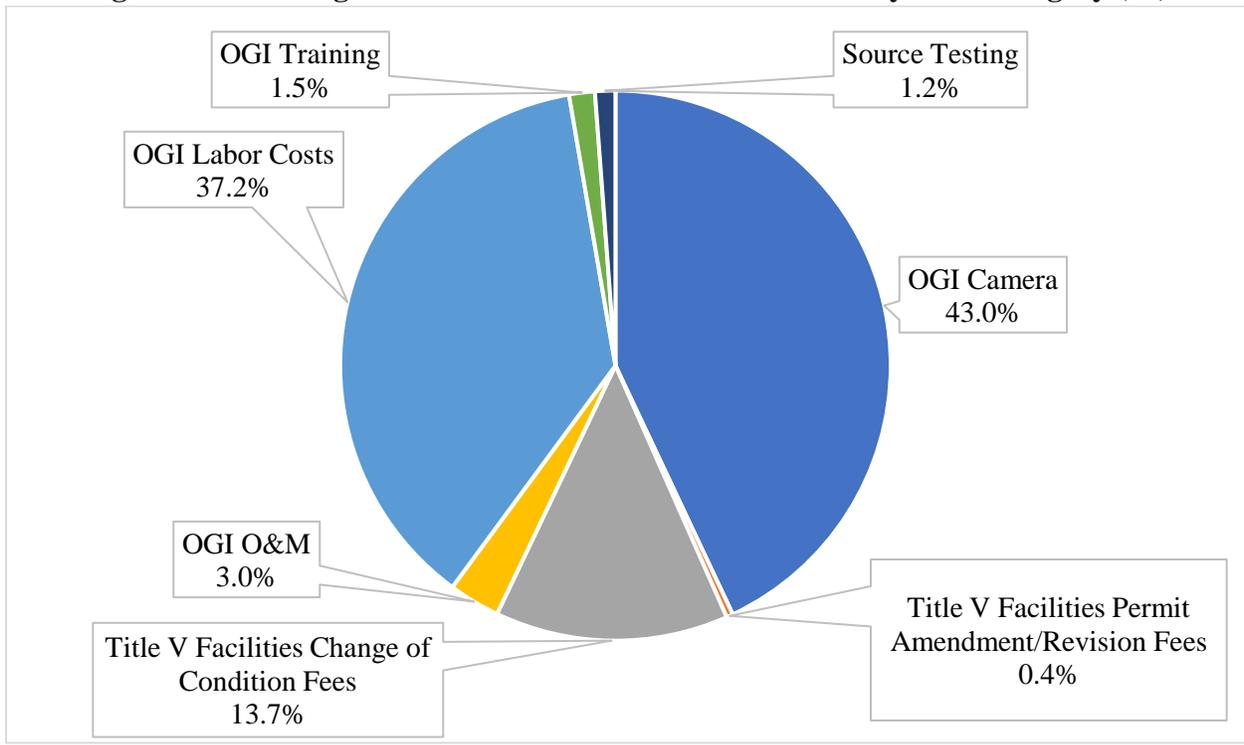
annual compliance cost of implementing PAR 462 is estimated to range from \$~~627,109~~ 433,903 to \$~~671,262~~ 472,068 for a 1 percent to 4 percent real interest rate, respectively. Table 4-4 presents both the present value and annual average cost for each equipment category of PAR 462.

Table 4-4: Total Present Value and Average Annual Estimated Costs of PAR 462

| Cost Categories | Present Value (2025) | | Annual Average Cost of PAR 462 (2026-2035) | |
|--|--|--|--|--|
| | 1% Discount Rate | 4% Discount Rate | 1% Interest Rate | 4% Interest Rate |
| Capital Costs | | | | |
| OGI Camera | <u>\$2,733,198</u> <u>\$3,006,517</u> | <u>\$2,340,615</u> <u>\$2,574,677</u> | <u>\$254,467</u> <u>\$279,914</u> | <u>\$288,577</u> <u>\$317,434</u> |
| Title V Facilities Permit Amendment/Revision Condition Update Fees | <u>\$24,612</u> <u>\$51,713</u> | <u>\$20,747</u> <u>\$44,286</u> | <u>\$2,334</u> <u>\$4,815</u> | <u>\$2,612</u> <u>\$5,460</u> |
| Title V Facilities Change of Condition Fees | <u>\$866,572</u> | <u>\$730,490</u> | <u>\$82,191</u> | <u>\$91,958</u> |
| Recurring Costs | | | | |
| OGI O&M | <u>\$192,078</u> <u>\$211,286</u> | <u>\$164,489</u> <u>\$180,938</u> | <u>\$20,280</u> <u>\$22,308</u> | <u>\$20,280</u> <u>\$22,308</u> |
| OGI Labor Costs | <u>\$2,364,947</u> <u>\$1,020,173</u> | <u>\$2,025,258</u> <u>\$873,641</u> | <u>\$249,696</u> <u>\$107,712</u> | <u>\$249,696</u> <u>\$107,712</u> |
| OGI Training | <u>\$96,517</u> <u>\$106,169</u> | <u>\$83,857</u> <u>\$92,243</u> | <u>\$10,140</u> <u>\$11,154</u> | <u>\$10,140</u> <u>\$11,154</u> |
| Source Testing | <u>\$76,521</u> | <u>\$67,379</u> | <u>\$8,000</u> | <u>\$8,000</u> |
| Total | <u>\$6,354,444</u> <u>\$4,472,379</u> | <u>\$5,432,836</u> <u>\$3,833,163</u> | <u>\$627,109</u> <u>\$433,903</u> | <u>\$671,262</u> <u>\$472,068</u> |

Figure 4-1 presents the estimated annual compliance cost of PAR 462 by cost categories. OGI Camera Costs are the largest proportion of the estimated average annual compliance costs (~~43 percent~~ 67%), followed by OGI Labor Costs (~~37 percent~~ 23%) and Title V Facilities Change of Condition Fees ~~OGI O&M~~ (~~14 percent~~ 5%).

Figure 4- 1: Average Annual Estimated Costs of PAR 462 by Cost Category (%)



Macroeconomic Impacts on the Regional Economy

Regional Economic Models, Inc. (REMI) developed the Policy Insight Plus Model (PI+ v3), which is a tool that South Coast AQMD typically uses to assess the impacts of rule development projects on the job market, prices, and other macroeconomic variables in the region when the average annual compliance cost is greater than one million current U.S. dollars.¹⁸ However, when the average annual compliance cost of a project is less than one million, the model cannot reliably determine the macroeconomic impacts, because resultant impacts from the project would be too small relative to the baseline economic forecast.

Since the total annual compliance cost of PAR 462 is estimated at ~~\$627,109,433,903~~ to ~~\$671,262,472,068~~ for a 1 percent% to 4 percent% real interest rate, respectively, which is well below \$1 million threshold, a macroeconomic impact analysis was not conducted for PAR 462.

CALIFORNIA ENVIRONMENTAL QUALITY ACT ANALYSIS

Pursuant to the California Environmental Quality Act (CEQA) Guidelines Sections 15002(k) and 15061, the proposed project (PAR 462) is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3). A Notice of Exemption ~~will be~~ has been prepared pursuant to CEQA Guidelines Section 15062. If PAR 462 is adopted, the Notice of Exemption will be filed for posting with the county clerks of Los Angeles, Orange, Riverside, and San Bernardino counties, and with the State Clearinghouse of the Governor's Office of Land Use and Climate Innovation.

DRAFT FINDINGS UNDER HEALTH AND SAFETY CODE SECTION 40727

Requirements to Make Findings

Health and Safety Code Section 40727 requires that prior to adopting, amending, or repealing a rule or regulation, the Governing Board make findings of necessity, authority, clarity, consistency, non-duplication, and reference based on relevant information presented at the public hearing and in the staff report.

Necessity

A need exists to amend PAR 462 to implement best available retrofit control technology, emission reduction strategies recommended in Control Measure FUG-01 in the 2022 Final AQMP, and contingency measures for the 2008 and 2015 ozone NAAQS.

Authority

¹⁸ Regional Economic Modeling Inc. (REMI). Policy Insight® for the South Coast Area (70-sector model). Version 3. 2023.

The South Coast AQMD obtains its authority to adopt, amend, or repeal rules and regulations pursuant to Health and Safety Code Sections 39002, 40000, 40001, 40440, 40702, 40725 through 40728, 40920.6, and 41508.

Clarity

PAR 462 is written or displayed so that its meaning can be easily understood by the persons directly affected by it.

Consistency

PAR 462 is in harmony with and not in conflict with or contradictory to existing statutes, court decisions, or state or federal regulations.

Non-Duplication

PAR 462 will not impose the same requirements as any existing state or federal regulations. The proposed amended rule is necessary and proper to execute the powers and duties granted to, and imposed upon, the South Coast AQMD.

Reference

In amending this rule, the following statutes which the South Coast AQMD hereby implements, interprets, or makes specific are referenced: Health and Safety Code Sections 39002, 40001, 40406, 40702, 40440(a), and 40725 through 40728.5.

COMPARATIVE ANALYSIS

Under Health and Safety Code Section 40727.2, the South Coast AQMD is required to perform a comparative written analysis when adopting, amending, or repealing a rule or regulation. The comparative analysis is relative to existing federal requirements, existing or proposed South Coast AQMD rules and air pollution control requirements and guidelines which are applicable to organic liquid loading. Because PAR 462 does impose new inspection and reporting requirements, a comparative analysis was conducted.

Table 4-5: Comparative Analysis

| Topic | South Coast AQMD | San Joaquin Valley Air Pollution Control District | Bay Area Air District | U.S. EPA |
|-------------------------------------|---|---|--|---|
| Rule | <ul style="list-style-type: none"> Rule 462 – Organic Liquid Loading¹⁹ | <ul style="list-style-type: none"> Reviewed Rule 4624 – Transfer of Organic Liquid²⁰ | <ul style="list-style-type: none"> Reviewed Regulation 8, Rule 33²¹ | Reviewed Title 40 CFR part 60 Subpart XXa ²² <ul style="list-style-type: none"> *1 mg/L follows BACT standards |
| Applicability | <ul style="list-style-type: none"> Organic liquid loading facilities that are defined as Class A, B, or C | <ul style="list-style-type: none"> Organic liquid transfer facilities defined as Class 1 or 2 | <ul style="list-style-type: none"> Gasoline transfer operations at gasoline bulk terminals | <ul style="list-style-type: none"> Bulk gasoline terminals |
| Newly Added Inspection Requirements | <ul style="list-style-type: none"> Monthly inspections with OGI camera | <ul style="list-style-type: none"> If leak found with OGI camera facility has 2 days to quantify | <ul style="list-style-type: none"> Not Applicable | <ul style="list-style-type: none"> OGI inspections required quarterly |
| Other amendments | <ul style="list-style-type: none"> Emission reduction from 0.08 to 0.04 pounds of VOC per thousand gallons Addition of 5-year periodic source tests Allowing removal of residue from loading rack couplers prior to inspection | <ul style="list-style-type: none"> Emission limit of 0.08 pounds of VOC per 1,000 gallons 5-year periodic source tests No rule language on residue removal | <ul style="list-style-type: none"> Emission limit of 0.04 pounds of VOC per 1,000 gallons for non-methane organic compounds Annual tests for vapor recovery systems, exemption for emission factor source test if requirement already in Title V permit No rule language on residue removal | <ul style="list-style-type: none"> 10 mg/L for thermal oxidation system, *1 mg/L for new thermal oxidation system 5-year periodic source tests for facilities complying with mass emission limit No rule language on residue removal |

¹⁹ <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-462>

²⁰ <https://ww2.valleyair.org/media/kgalm4y4/rule-4624.pdf>

²¹ https://www.baaqmd.gov/~media/dotgov/files/rules/refinery-rules-definitions/rg0833_20211103.pdf

²² [https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-XXa#p-60.503a\(a\)](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-XXa#p-60.503a(a))

| Topic | South Coast AQMD Rule 462 – Organic Liquid Loading | San Joaquin Valley Air Pollution Control District | Bay Area Air District | U.S. EPA |
|-----------------|--|--|--|--|
| Leak Standards | <ul style="list-style-type: none"> • 3,000 PPM | <ul style="list-style-type: none"> • 10,000 PPM for gasoline • 1,000 PPM for organic liquids | <ul style="list-style-type: none"> • 3,000 PPM | <ul style="list-style-type: none"> • 10,000 PPM |
| Repair Schedule | <ul style="list-style-type: none"> • Three calendar days | <ul style="list-style-type: none"> • 72 hours | <ul style="list-style-type: none"> • 8 hours for connectors & 72 hours for P/V Valves | <ul style="list-style-type: none"> • 5 – 15 calendar days |
| Recordkeeping | <ul style="list-style-type: none"> • Recordkeeping required | <ul style="list-style-type: none"> • Recordkeeping required | <ul style="list-style-type: none"> • Recordkeeping Required | <ul style="list-style-type: none"> • Recordkeeping Required |

**APPENDIX A – RESPONSE TO COMMENTS~~RESPONSES TO~~
COMMENT LETTERS**

Comments from Public Workshop

Comment PW-1: Neil Davenport, Davenport Engineering, asked which components are subject to the optical gas imaging (OGI) inspections.

Response: Components that are to be inspected with OGI include: all the components of the liquid loading line between any storage tanks, the liquid pump and the transporting vessel, the vapor return line from the transporting vessel to the storage tank, and the vapor recovery system and/or vapor disposal system. Other rules such as 462 and 1178 have similar OGI requirements for storage tanks and the goal was to require similar OGI requirements for the facility as a whole.

Comment PW-2: Hadley Nolan, SoCalGas, requested that ‘true vapor pressure’ be specified in the rule for clarification and consistency with other rules such as Rule 463.

Response: Staff researched true vapor pressure and agreed to the addition to clarify the type of vapor pressure this rule is referring to. This is also consistent with storage tank Rules 463 and 1178 that reference true vapor pressure since the organic liquid that is loaded is typically stored in storage tanks where either Rule 463 or 1178 applies.

Comment PW-3: Cinnamon Smith, Kinder Morgan, asked if an already approved protocol is acceptable or would they need to resubmit an updated one.

Response: Staff stated that the source testing requirements are for facilities that have not been conducting periodic source testing. For existing facilities that have been conducting periodic source tests and have an approved source test protocol, a new source test protocol would not be required provided that there are no modifications to the facility’s vapor recovery system and/or vapor disposal system.

Comment PW-4: Cinnamon Smith, Kinder Morgan, asked why some rule language has been deleted for continuous monitoring system (CMS) plans in section (e) Compliance Schedule.

Response: Staff stated that the intent for the CMS Plan deletion is due to the fact that the timeline for when those plans were due has long passed but the requirement to have a CMS system still remains in section (d) Requirements.

Comment PW-5: Cinnamon Smith, Kinder Morgan, asked why the rule has a periodic requirement for every five years instead of every sixty months.

Response: Staff sees no issue in changing this requirement from every five years to every sixty months. Staff reviewed permits with Rule 462 air pollution control devices and noted that they had

'60 month' language in them. Additionally, by having "monthly" wording, the periodic source test will be restricted to being conducted within that month rather than within the year. The rule language will be updated to every sixty months.

Comment PW-6: Neil Davenport, Davenport Engineering, questioned how the effective date of July 1, 2026 was established for the addition of OGI inspections.

Response: Staff considers one year from rule amendment to be sufficient time for operators to prepare for changes such as for the addition of OGI inspections and is consistent with other rule amendments with similar new requirements. Additionally, staff updated the effective date to August 1, 2026 since the rule was postponed to go to the South Coast AQMD Governing Board from June 6, 2025 to August 1, 2025.

Comment PW-7: Moses Huerta, resident, questioned what constitutes trained personnel for OGI inspections and if that training would be provided by the manufacturer, South Coast AQMD, or internal certification.

Response: The intent is to abide by manufacturer's recommendations for training and certification. AQMD inspector training for OGI inspections is done through the California Air Resources Board.

Comment Letter 1: Cinnamon Smith, Kinder Morgan, Received 4/16/2025



Via Email at: jenriquez1@aqmd.gov

April 16, 2025
 Jose Enriquez
 Air Quality Specialist
 South Coast Air Quality Management District
 21865 Copley Drive
 Diamond Bar, CA 91765

RE: Comments on March 21, 2025 Preliminary Draft Rule Language for Proposed Amended Rule 462, Organic Liquid Loading

Dear Mr. Enriquez:

Kinder Morgan (KM) appreciates the opportunities to participate in the Work Group Meetings and converse with South Coast Air Quality Management District (SCAQMD) Rule Writing Staff (Staff) regarding Proposed Amended Rule (PAR) 462, Organic Liquid Loading. Kinder Morgan operates organic liquid loading facilities located within the South Coast Air Basin that are subject to Rule 462.

SCAQMD PAR 462 Rule Writing Staff released the preliminary draft Rule 462 language and draft Staff report on March 21, 2025. KM respectfully offers the following comments on the draft rule language.

Leak Inspection Requirements

1. **(d)(6)** PAR 462 (d)(6)(A) requires the facility to inspect Transfer Equipment and allows for a monthly frequency using sight, sound, and smell or a quarterly if using an organic vapor analyzer (OVA). The quarterly inspection with an OVA is intended to locate Facility Vapor Leaks in excess of 3,000 ppm as methane above background when measured according to US EPA Method 21 per PAR 462(c)(9). PAR 462 aims to expand the definition of Transfer Equipment such that piping components beyond liquid loading pump would become subject. PAR 462 does not establish sufficient applicability distinction between piping components that will be subject to this Transfer Equipment definition or components subject to Rules 466 and 466.1. KM operates facilities that are subject to Rules 462, 466, and 466.1. Rules 466 and 466.1 require the use of a portable hydrocarbon detection instrument for gaseous leaks of VOC in excess of 10,000 ppm measured as hexane to conduct inspections. Because PAR 462 does not exempt piping components subject to Rule 466 and 466.1, these piping components will require duplicative inspection to comply with the differing inspection methods. KM recommends adding an exemption similar to the exemption in Rule 1173(l)(3) that states "The provisions of Rules 466 and 466.1 shall not apply to facilities subject to this rule." Without this exemption, confusion will be caused when a facility completes a repair of a Facility Vapor Leak/Gaseous Leak and is required to both demonstrate by reinspection using Method 21 and a calibration to hexane that the piping component is no longer leaking and maintain records of each reinspection.

1-1

1001 Louisiana Street, Suite 1000, Houston, TX 77002

April 16, 2025
Page 2 of 2

Class A Facilities Loading Requirements

1. (d)(1) PAR 462 (d)(1)(D) will require Class A Facilities to meet a reduced emissions limit of 0.04 lbs of VOCs per 1000 gallons of Organic Liquid transferred. It should be noted that PAR 462 does not include a timeline for compliance with this limit reduction. PAR 462 maintains the existing requirement from Rule 462 that a Class A Facility be equipped with a California Air Resource Board (CARB) certified Vapor Recovery and/or Vapor Disposal System. As an example, a Class A Facility may have received CARB certification in 2015 following a source test demonstrating compliance with a SCAQMD New Source Review (NSR) emission standard of 0.045 lbs/1000 gallons and ARB standard of 0.29 lbs/1000 gallons. Source testing required by permit conditions would have been completed within the past one or two years. This example facility has not requested modifications to the Vapor Recovery System to require certification through CARB. The current PAR 462 language appears to cause this example facility to no longer have a valid CARB certification and must recertify. KM is concerned that Staff have not considered the impact from this emissions reduction to existing CARB certifications, existing NSR emission standards, or the associated costs to obtain recertification before the next permit-required source test is due. KM recommends a publicly accessible meeting with CARB to evaluate the proposed emission reduction and for Staff to review impacts to the Title V facility operating permits of the 20 Class A Facilities including potential to emit, throughputs, permitting costs, source testing costs, and permitting timeframes.

1-2

Sincerely,

Duncan Sinclair
Director of Operations
Kinder Morgan

cc: Michael Morris, Michael Krause, SCAQMD
Peter Jensen, Nina McAfee, Cinnamon Smith, Kinder Morgan

1001 Louisiana Street, Suite 1000, Houston, TX 77002

Comment 1-1: Staff researched both Rules 466 and 466.1 and acknowledges the potential for duplication of inspections being conducted. Also, staff noted that these two rules were last updated in the 1980s and have less stringent leak thresholds of 10,000 PPM compared to the current leak threshold of 3,000 PPM in PAR 462. The analyzer inspection frequency requirement is identical between the Rule 466 series and PAR 462. Staff also confirmed that Rule 1173 contains an exemption for these two rules. Therefore, staff does not foresee any issues by exempting these two rules, and PAR 462 provides an exemption from Rules 466 and 466.1.

Comment 1-2: Staff has reviewed source tests results from Class A facilities that are subject to Rule 462 and have observed that facilities will be able to meet the new proposed standard of 0.04 pounds of VOCs per thousand gallons of organic liquid transferred without equipment needing to be replaced or upgraded. Staff confirmed with CARB that reducing the VOC threshold to 0.04 pounds of VOC per thousand gallons would not affect facilities' certifications provided that no modifications are done to the facilities' vapor recovery systems.

Comment Letter 2: Hao Jiang, Disneyland Resort, Received 4/15/2025

Hi Mike,

Disneyland Resort permitted and operates a Class "C" gasoline bulk loading facility. The permit limits its throughput to no more than 15,000 gallons per month (equivalent to ≤ 500 gallons per day). Disneyland bulk loading operation is subject to Rule 462.

As proposed in current PAR 462, all Rule 462 facilities will be required to conduct Optical Gas Imaging (OGI) testing monthly or biweekly. While OGI is useful for detecting fugitive VOC emissions, requiring OGI to ultra small operations like Disneyland are burdensome and would not be cost effective. As such, I would like to suggest the District including an exemption that only remove OGI requirement from ultra small bulk loading facilities. All other established requirements will still apply.

Suggested language for section (j)(3): "The provision of subparagraph (d)(6) shall not apply to Class "C" facility that load not more than 500 gallons (1,893 liters) of gasoline on any one day and not more than 180,000 gallons in any one calendar year."

Thank you for your consideration.

Hao Jiang, P.E.
 Environmental Affairs / Disneyland Resort
 TDA 229D1
 Anaheim, CA 92802
Hao.jiang@disney.com

Comment 2: A cost-effectiveness calculation was conducted based on the permit throughput limit, and on an assumption that there are two active facilities that fall under Class C status. Below is the cost-effectiveness calculation for these two Class C facilities:

- 2 known Class C facilities, 15,000 gal/month x 12 months = 180,000 gal
- 180,000 gal x 2 facilities = 360,000 gal/year throughput for 2 facilities
- 5,525,599,023 is estimated total annual throughput of all Class A facilities
- $(360,000 \text{ gal/year}) / (5,525,599,023 \text{ gal/year}) = 0.000065 = 0.0065\%$ is throughput difference of the two Class C facilities compared to Class A facilities
- 14.6 tons/year is expected annual emission reductions
- $0.000065 \times 14.6 = 0.001 \text{ tons/year} = 2 \text{ lbs VOC per year}$
- 20 cameras for 20 companies with maintenance and other costs is estimated to be \$4,628,902 over 10 years
- The number of Class C facilities is 10% of the number of Class A facilities, and 10% of \$4,628,902 is \$462,890 over 10 years
- For the two companies the cost per year is \$46,289
- $CE = \$46,289 / 0.001 \text{ tons/year} = \$46,289,000 \text{ per ton of VOC}$

For Class C facilities, staff found that it would not be cost-effective to conduct monthly OGI inspections and therefore PAR 462 provides an exemption from monthly OGI inspection requirements for those facilities.

Comment Letter 3: Western States Petroleum Association, Received 6/1/2025



Patty Senecal
Senior Director, Southern California Region

June 2, 2025

Michael Morris
Planning and Rules Manager
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Via e-mail at: mmorris@aqmd.gov

Re: SCAQMD Proposed Amended Rule 462, Organic Liquid Loading – WSPA Comments on Preliminary Draft Rule Language

Dear Mr. Morris,

Western States Petroleum Association (WSPA) appreciates the opportunity to participate in the Working Group Meetings (WGMs) for South Coast Air Quality Management District (SCAQMD or District) Proposed Amended Rule 462, Organic Liquid Loading (PAR 462). WSPA is a non-profit trade association representing companies that explore for, produce, refine, transport, and market petroleum, petroleum products, natural gas, renewable fuels, and other energy supplies in five western states including California. WSPA has been an active participant in air quality planning issues for over 30 years. WSPA-member companies operate petroleum refineries and other facilities in the South Coast Air Basin that will be impacted by PAR 462.

SCAQMD released initial preliminary draft rule language for PAR 462 on March 21, 2025.¹

WSPA offers the following comments on the draft rule language.

- 1. **The California Health and Safety Code requires the District to ensure that a BARCT standard is technologically feasible and cost-effective. There are several defects in the PAR 462 cost-effectiveness analysis which render it inadequate. First, the District uses extrapolated leak rates for equipment subject to another SCAQMD rule and has not provided documentation to support the number of leaks per year that it assumes would be controlled by the proposal. Additionally, the District’s analysis appears based on all 51 facilities subject to PAR 462 being able to meet the proposed requirements but has not provided sufficient evidence to support this conclusion. Further, the cost-effectiveness analysis omits certain compliance costs associated with the proposed rule. WSPA recommends that these issues need to be addressed in the cost-effectiveness analysis.**

The California Health & Safety Code requires the District, in adopting any Best Available Retrofit Control Technology (BARCT) standard, to ensure the standard is technologically feasible, and take into account “environmental, energy, and economic impacts” to assess the

3-1

¹ Proposed Amended Rule 462, Organic Liquid Loading: Initial Preliminary Draft Rule Language. Available at: https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/par-462/preliminary-draft-rule-language-462---organic-liquid-loading_final.pdf?sfvrsn=9899f61_6

June 2, 2025
Page 2

cost-effectiveness of the proposed control options.² Cost-effectiveness is defined as the cost, in dollars, of the control alternative, divided by the emission reduction benefits, in tons, of the control alternative.³ If the cost per ton of emissions reduced is less than the established cost-effectiveness threshold, then the control method is considered to be cost-effective. If the cost per ton of emissions reduced is higher than the established cost-effectiveness threshold, then the control method is considered to be cost-prohibitive. Cost-effectiveness evaluations need to consider both capital costs (e.g., equipment procurement, shipping, engineering, construction, and installation) and operating costs (including expenditures associated with utilities, labor, and replacement). Currently, the District is applying for a cost-effectiveness threshold of \$36,000 per ton of VOC emissions reduced, consistent with the 2022 Air Quality Management Plan (2022 AQMP).⁴



In the PAR 462 PDSR, SCAQMD estimates the leak rate as 200 pounds of VOC per day per leak, which is 2.5% of the storage tank leak rate in Rule 1178 and is consistent with the leak rate used for Rule 1148.1, Oil and Gas Production Wells.⁵ Rule 1148.1 establishes this 200 pounds of VOC per day per leak on the basis that it "is expected to be consistent with the type of facilities regulated by this rule"⁶, however, Rule 1148.1 is for Oil and Gas Production wells, which are a completely different source category from the Class A Facilities subject to PAR 462. SCAQMD assumes there will be five major leaks per year "based on the average number of leaks found over the last five years" but did not provide documentation in the PAR 462 Preliminary Draft Staff Report (PDSR) to support this assumption.⁷

3-1

Truck loading racks subject to Rule 462 are unique equipment in that they have active visual observations by truck drivers who interact with loading arm and vapor recovery hoses; often this occurs at truck racks 24 hours a day, 365 days a year. Drivers report liquid and vapor leaks to terminal operations to investigate and repair, both because it is an air quality compliance issue and also for their own personal health due to potential vapor exposure to the potential for a vapor leak to ignite. Many terminals have staff complete daily walks, which adds another layer of observation.

SCAQMD needs to provide documentation to support the assumed leak rate and number of leaks for facilities subject to PAR 462.

SCAQMD has proposed a revised standard of 0.04 pound of VOC per thousand gallons for vapor recovery systems (VRSs) and vapor disposal systems (VDSs). The PDSR states that that SCAQMD performed site visits at four subject facilities and the VSRs and VDSs at each of those sites were emitting less than 0.04 pounds of VOC per thousand gallons of organic liquid transferred.⁸ The PDSR also states that the District reviewed recent source tests and Annual Emissions Reporting (AER) site specific emission factors for Class A facilities and found that the VRSs and VSDs evaluated were less than the 0.04 pounds of VOC per

3-2

² California Health & Safety Code §40406, 40440, 40920.6.

³ California Health & Safety Code §40920.6.

⁴ SCAQMD Draft Final 2022 Air Quality Management Plan. Available at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>.

⁵ Ibid.

⁶ PAR 1148.1 Preliminary Draft Staff Report. Available at: https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1148.1/par-1148-1-draft-staff-report-final.pdf?sfvrsn=1d128961_8

⁷ PAR 462 Preliminary Draft Staff Report. Available at: https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/par-462/par-462-preliminary-draft-staff-report_final.pdf?sfvrsn=5899f61_6

⁸ Ibid.

June 2, 2025
Page 3

thousand gallons of organic liquid transferred.⁹ It should be noted that source test results are a good indicator, but are only a snapshot in time, typically of a well-tuned unit at the time of a 5-year source test. WSPA is concerned that the proposed limit may be achievable for carbon VRSs, but not necessarily all vapor combustion units (VCUs) on a continuous basis. Facilities may need to explore new minimum burn temperatures, because the existing temperatures were based on the 0.08 lb/1000 gallon limit and to minimize NOx emissions.



3-2

WSPA is concerned for the loss of compliance margin for both VRSs and VCUs. With any piece of operating equipment, emissions are not flat, and there may be data peaks above the 0.04 lb/1000 gallon limit. The District has not provided stakeholders with clear data and information on the number of facilities included in their review or any basis to support the assumed ability of the 51 subject facilities to comply with a lower standard.

WSPA recommends that current Rule 462 source tests and the one-time CARB certification source tests (applicable to a subset of gasoline loading facilities) should be reviewed for all 51 subject facilities to properly understand if facilities would actually be able to comply with a lower standard or would experience new compliance costs under this proposal.

SCAQMD permits to operate (generally) require a 15-minute averaging time. This averaging time is based on a 1990's WSPA/SCAQMD policy agreement, although the averaging time is not provided in Rule 462, WSPA recommends that permit to operate conditions be thoroughly reviewed to ensure alignment with this rulemaking and 40 CFR Part 63, Subpart R, National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout stations. Subpart R requires compliance based on 6-hour averages. Compliance will be based on 3-hour averages starting in May 2027.¹⁰ The 3-hour averaging time is based on recent rulemaking that involved a significant amount of rigorous technical research by EPA staff and input from affected sources nationwide, the American Petroleum Institute (API), and the International Liquid Terminals Association (ILTA).

3-3

The 15-minute averaging time required by SCAQMD permits to operate may be too restrictive for the proposed 0.04 lb/1000 gallon limit. It will likely result in more frequent and lengthy shutdowns and loading disruptions. The District has not demonstrated the limit and averaging time to be technically feasible.

WSPA recommends that averaging times be updated in permits to operate to align with the federal requirements.

SCAQMD has included no compliance costs associated with upgrading control devices and has only included costs for submission of Title V permit revisions to include the revised limit.¹¹ If the District did not confirm that all 51 subject facilities can meet this limit, then the District's cost-effectiveness analysis must be completed to include costs for facilities that would need to modify or replace equipment in order to meet the proposed limit. This has not been done.

3-4

PAR 462(d)(1)(D) requires that facilities demonstrate compliance with the VOC emission limit by source testing of the VRS and VDS every five years. A carbon VRU recertification test is

⁹ Ibid.

¹⁰ 40 CFR Part 63, Subpart R, National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout stations. Available at: <https://www.ecfr.gov/current/title-40/chapter-II/subchapter-C/part-63/subpart-R>.

¹¹ PAR 462 Preliminary Draft Staff Report. Available at: https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/par-462-preliminary-draft-staff-report_final.pdf?sfvrsn=5899f61_6

June 2, 2025
Page 4

costly because it requires extensive coordination, resources, and 24 hours of throughput volume. The District has not accounted for costs associated with such source tests in the cost-effectiveness analysis.¹² These costs are associated with the new limit and therefore must be accounted for in the cost-effectiveness analysis.



3-4

The District has not considered the potential reduction in primary operating vapor units' capacity which would result from the proposed tightening of the VOC limit from 0.08 to 0.04 lb/mgal.

WSPA recommends that the District confer with equipment manufacturers to understand the operational impact of this change as it will have direct bearing on the compliance cost associated with PAR 462. This information is necessary for the cost-effectiveness analysis.

- 2. WSPA appreciates that SCAQMD has recognized included language in PAR 462(d)(8) that allows a facility to remove residual liquid from a coupler prior to retesting by SCAQMD personnel for compliance determinations.



3-5

- 3. PAR 462(f)(8)(D) would require any changes of the source testing schedule to be reported to the District no later than 24 hours prior to testing or within 1 hour of discovery of a change in the schedule. WSPA recommends that this requirement be removed.



3-6

PAR 462(f)(8)(D) would require changes in the source testing schedule to be reported to the District within one hour of the discovery of the change in schedule or no later than 24 hours prior to testing. For example, if the source tester is unable to perform the test at the last minute or there is inclement weather, facilities would be required to notify the District within the hour. This is an onerous and unnecessary requirement. WSPA requests that this requirement be removed.

- 4. PAR 462(d) (6)(B) requires a repair time of 72 hours for any Facility Vapor leaks, Liquid Leaks, or Visible Vapors detected. WSPA requests that this be changed to a 3-day repair time requirement to align with recently amended Rule 463, Organic Liquid Storage and Rule 1178, Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities.



3-7

(d)(6)(B): Leak Inspection Requirements

WSPA recommends that the repair time of 72 hours be changed to 3 days to be consistent with recently amended Rule 463, Organic Liquid Storage, and Rule 1178 (Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities).

Suggested language is presented below:

Each detection of a Facility Vapor Leak, Liquid Leak, or Visible Vapors shall be repaired or replaced within ~~72 hours~~ 3 days. The repaired or replacement component shall be reinspected the first time the component is in operation after the repair or replacement.

¹² Ibid.

June 2, 2025
Page 5

The 1979 Rule 462 amendment established a VOC emission limit of 0.65 pounds per thousand gallons.¹³ This limit has been lowered several times over the years. The decrease from 0.65 to the current 0.08 pounds represents an 88% reduction from 1978 to 2025 demonstrating WSPA’s commitment to working alongside the District to increase the industry’s environmental stewardship.

3-8

WSPA appreciates the extended time and opportunity to provide these comments related to PAR 462 and we are open to meeting with Staff to review the data. We look forward to continued discussion of this important rulemaking. If you have any questions, please contact me at (310) 808-2144 or via e-mail at psenecal@wspa.org.

Sincerely,
Patty Senecal

Cc: Wayne Nastri, SCAQMD
Michael Krause, SCAQMD
Rodolfo Chacon, SCAQMD
Jose Enriquez, SCAQMD

¹³ PAR 462 Preliminary Draft Staff Report. Available at: https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/par-462/par-462-preliminary-draft-staff-report_final.pdf?sfvrsn=5899f61_6.

Comment 3-1: Staff conducted a cost-effectiveness analysis based on the number of Rule 462 leaks reported by the Compliance and Enforcement team. Staff reviewed reported enforcement data for five years, from 2019 through 2023, and found that there was an average of five leaks per year that were identified by inspectors.

| Year | Number of Leaks | Leak Concentrations (ppm) |
|---------------------------------------|-----------------|--|
| 2019 | 7 | 5,000 16,100 13,300 100,000 10,100 4,100 21,700 |
| 2020 | 0 | |
| 2021 | 0 | |
| 2022 | 6 | 10,000 36,900 8,869 6,500 4,075 11,000 |
| 2023 | 12 | 17,500 4,004 40,200 34,100 9,000 1,300 80,500 74,000 79,800 78,800 11,400 13,600 |
| Average number of leaks per year is 5 | | |

Staff used 200 pounds of VOC per day which is a portion of the leak rate used in Rule 1178 and 463. Staff reviewed CAPCOA²³ guidelines document and was not able to use their emission factors due to lack of component count and flow rate data from the facilities. Additionally, since Rule 462 does not require facilities to submit detailed records of their leaks, staff relied on leak information documented in Notices of Violations issued by South Coast AQMD compliance staff. There may be leaks that are not detected by South Coast AQMD compliance staff and the number of leaks could potentially be higher. For these reasons, staff used a portion of the leak rate data used in Rules 1178 and 1148.1.

Comment 3-2: Staff researched the permits for Class A facilities and found that there are approximately 20 facilities that would be affected by the proposed reduction from 0.08 pounds of VOC and not 51 facilities (now updated to 53) as only Class A facilities would be subject to the proposed reduction. Additionally, staff reviewed eighteen Class A facility source tests and found that they all meet the proposed limit of 0.04 pounds per thousand gallons, with some tests showing results as low as 0.0001 pounds of VOC per thousand gallons. Lastly, staff conducted outreach to stakeholders that operate affected equipment and no facility has responded that they cannot meet the new proposed limit with existing equipment.

Comment 3-3: Staff recognizes that there may be difficulty in meeting the proposed VOC limit of 0.04 pounds per thousand gallons over a 15-minute average. ~~Stakeholder data showed a number of 15-minute average values above the proposed VOC limit, which may cause shutdowns of their bulk loading operations. Vapor recovery systems typically operate on a 15-minute cycle where~~

²³ California Air Pollution Control Officers Association. California Implementation Guidelines For Estimating Mass Emissions Of Fugitive Hydrocarbon Leaks At Petroleum Facilities. <https://ww2.arb.ca.gov/sites/default/files/2020-04/CAPCOA%201999.pdf>

~~one carbon bed is adsorbing while the other carbon bed is regenerating. The proposed rule does not specify the averaging time to be used. Previous CMS plans have prescribed a 15-minute averaging time and a longer averaging time may be needed to minimize potential shutdowns if the VOC limit is reduced to 0.04 pounds per thousand gallons. A CMS Plan may need to be resubmitted as needed to minimize potential shutdowns. Stakeholder data showed a number of 15-minute average values above the proposed VOC limit, which may cause brief pauses of their bulk loading operations. These vapor recovery systems typically operate on a 15-minute cycle where one carbon bed is adsorbing while the other carbon bed is regenerating. The rule does not specify the averaging time to be used as that was determined during the previous review of the CMS plans for each facility. Previous CMS plans have prescribed a 15-minute averaging time to demonstrate compliance with the current mass limit of 0.08 pounds per thousand gallons. However, with the lower mass limit of 0.04 pounds per thousand gallons, a longer averaging time could be considered to account for potential spikes in the outlet VOC concentrations while meeting a lower limit. It should be noted that spiking data can be a beneficial indicator that action on the equipment might be needed. Under the proposed rule, facilities will submit for permit applications to modify the permit and CMS plans to add a new concentration limit, which will be calculated based on a facility's operating parameters that equates to the proposed lower mass limit. At that time, a facility may request averaging times longer than 15-minutes and provide the data and justification. Depending on the facility's operation, longer averaging times might be necessary and warranted, and staff is committed to review the request and ensure the appropriate averaging time, which could range from 15 minutes to 3 hours, is applied for each facility based on their configuration and ensuring that the CMS is operating as intended.~~

Comment 3-4: For facilities that are already conducting periodic source testing, there are no expected changes. For the two facilities that will be required to start performing periodic source testing, staff found the cost to be approximately \$20,000 per test. Staff has added this cost into the cost-effectiveness section.

Comment 3-5: Thank you for your comment.

Comment 3-6: Staff agrees with this statement and has removed language regarding the source testing schedule. Staff had previously identified another rule with this source test requirement due to the highly toxic nature of the regulated pollutant. Staff believes the same level of stringency would be overly burdensome if applied to PAR 462.

Comment 3-7: Staff agrees that 72 hours is equivalent to 3 calendar days. Staff has also reviewed the other rules and has updated the rule language for consistency.

Comment 3-8: Thank you for your comment.

ATTACHMENT H



**South Coast
Air Quality Management District**

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SUBJECT: NOTICE OF EXEMPTION FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

PROJECT TITLE: PROPOSED AMENDED RULE 462 – ORGANIC LIQUID LOADING

Pursuant to the California Environmental Quality Act (CEQA) Guidelines, the South Coast Air Quality Management District (South Coast AQMD), as Lead Agency, has prepared a Notice of Exemption pursuant to CEQA Guidelines Section 15062 – Notice of Exemption, for the project identified above.

If the proposed project is approved, the Notice of Exemption will be filed for posting with the county clerks of Los Angeles, Orange, Riverside, and San Bernardino Counties. The Notice of Exemption will also be electronically filed with the State Clearinghouse of the Governor's Office of Land Use and Climate Innovation for posting on their CEQAnet Web Portal which may be accessed via the following weblink: <https://ceqanet.lci.ca.gov/Search/Recent>. In addition, the Notice of Exemption will be electronically posted on the South Coast AQMD's webpage which can be accessed via the following weblink: <http://www.aqmd.gov/nav/about/public-notices/ceqa-notices/notices-of-exemption/noe---year-2025>.

**NOTICE OF EXEMPTION FROM THE
CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)**

To: County Clerks for the Counties of Los Angeles, Orange, Riverside and San Bernardino; and Governor's Office of Land Use and Climate Innovation – State Clearinghouse
From: South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Project Title: Proposed Amended Rule 462 – Organic Liquid Loading

Project Location: The proposed project is located within the South Coast Air Quality Management District's (South Coast AQMD) jurisdiction, which includes the four-county South Coast Air Basin (all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties), and the Riverside County portion of the Salton Sea Air Basin and the non-Palo Verde, Riverside County portion of the Mojave Desert Air Basin.

Description of Nature, Purpose, and Beneficiaries of Project: Rule 462 seeks to control emissions of volatile organic compounds (VOC) originating from bulk terminals and other facilities that load organic liquids into tank trucks, trailers, or railroad tank cars. Proposed Amended Rule (PAR) 462 partially implements Control Measure FUG-01 – Improved Leak Detection and Repair, of the 2022 Air Quality Management Plan by: 1) requiring monthly optical gas imaging (OGI) inspections; 2) requiring periodic source tests on vapor control systems at Class A facilities (facilities which load 20,000 gallons or more of organic liquids per day); 3) reducing VOC limits for vapor control systems at Class A facilities from 0.08 to 0.04 pound per 1,000 gallons of organic liquid transferred; and 4) adding new and updated definitions, and implementing other minor changes for consistency and clarity. Additionally, PAR 462 introduces a contingency measure as required by the federal Clean Air Act, which, if triggered, would require bi-weekly OGI inspections. Implementation of PAR 462 is anticipated to benefit public health and ambient air quality by reducing VOC emissions by 0.34 ton per day plus an additional 0.01 ton per day if the contingency measure is triggered.

| | |
|--|--|
| Public Agency Approving Project: South Coast Air Quality Management District | Agency Carrying Out Project: South Coast Air Quality Management District |
|--|--|

Exempt Status: CEQA Guidelines Section 15061(b)(3) – Common Sense Exemption

Reasons why project is exempt: South Coast AQMD, as Lead Agency, has reviewed the proposed project pursuant to: 1) CEQA Guidelines Section 15002(k) – General Concepts, the three-step process for deciding which document to prepare for a project subject to CEQA; and 2) CEQA Guidelines Section 15061 – Review for Exemption, procedures for determining if a project is exempt from CEQA. PAR 462 will achieve VOC emission reductions through more stringent VOC limits and by requiring frequent OGI inspections, which can be accomplished without physical modifications; thus, it can be seen with certainty that implementing the proposed project would not cause a significant adverse effect on the environment. Therefore, the proposed project is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3) – Common Sense Exemption.

Date When Proposed Project Will Be Considered for Approval (subject to change):

South Coast AQMD Governing Board Public Hearing: August 1, 2025

| | | |
|--|--|---|
| CEQA Contact Person: Zoya Banan, Ph.D. | Phone Number: (909) 396-2332 | Email: ZBanan@aqmd.gov |
| PAR 462 Contact Person: Jose Enriquez | Phone Number: (909) 396-2640 | Email: JEnriquez1@aqmd.gov |

Date Received for Filing: _____ **Signature:** (Signed and Dated Upon Board Approval)
Kevin Ni
Program Supervisor, CEQA
Planning, Rule Development, and Implementation



Proposed Amended Rule 462 - Organic Liquid Loading

Governing Board Meeting
August 1, 2025



Rule 462 Regulatory History

- Adopted in 1976 with six amendments
 - Last amended in 1999
- Controls volatile organic compound (VOC) emissions during loading of organic liquids into any tank truck, trailer, or railroad tank car
- Applicable to approximately 53 organic liquid loading facilities
 - Class A: 20 facilities (loading > 20,000 gal/day)
 - Class B: 31 facilities (loading 4,000-20,000 gal/day)
 - Class C: 2 facilities (loading < 4,000 gal/day)



Background



- Rule development was initiated in response to:
 - AB 617 Community of Wilmington, Carson, West Long Beach (WCWLB) Community Emission Reduction Plan (CERP) objective
 - Partially implement the 2022 Air Quality Management Plan (AQMP) Control Measure FUG-01: Improved Leak Detection and Repair
 - Address contingency measure requirements

Summary of Key Proposals



New requirement for monthly use of Optical Gas Imaging (OGI) for enhanced leak detection
(Class A and B Facilities)



Reduce emission limit from control devices from 0.08 to 0.04 pounds of VOC per 1,000 gallons transferred
(Class A Facilities)



Add five-year periodic source tests for emission control devices
(Class A Facilities)



Clarify procedure to remove residue from loading rack couplers prior to inspection
(All Facilities)

Contingency Measures



- Clean Air Act requires contingency measures for applicable ozone National Ambient Air Quality Standards (NAAQS)
- Contingency measures are additional rule requirements that are triggered if the U.S. EPA determines that South Coast AQMD has failed:
 - To meet a reasonable further progress (RFP) milestone in the Coachella Valley area, or
 - To attain an ozone NAAQS in the Coachella Valley area
- Proposed contingency measure will increase OGI inspection frequency from monthly to every two weeks if triggered

Cost-Effectiveness & Emission Reductions

| Proposed Requirement | Annualized Cost From All Facilities | Emission Reductions (tons/day) | Cost-Effectiveness¹ (\$/ton) |
|--------------------------------|--|---------------------------------------|--|
| Monthly OGI | \$463,000 | 0.04 | \$31,700 |
| Title V Permit Revision | \$81,000 | 0.30 | N/A ² |
| Source Testing | \$8,000 | N/A | N/A |
| Overall | \$552,000 | 0.34 | \$37,800 |

¹ VOC cost-effectiveness threshold for 2024 is \$41,400/ton

² Emission reductions not included as part of the cost-effectiveness analysis as facilities are already meeting proposed standard

Socioeconomic Impact Assessment & CEQA

Socioeconomic Impact Assessment

- Average annual compliance cost ranges from \$627,000 to \$671,000 over 2026-2035*

California Environmental Quality Act (CEQA)

- No significant adverse environmental impacts are expected
- A Notice of Exemption has been prepared

*Using a real interest rate of 1% and 4%, respectively

Staff Recommendation

Adopt resolution:

- Determining that PAR 462 is exempt from the requirements of CEQA
- Amending Rule 462
- Submitting PAR 462 into State Implementation Plan