

October 2, 2026

Mr. Arieo Soltani
Program Supervisor
South Coast Air Quality Management District

RE: Submission to the Public Record

Request for 60-Day Extension of Time to Submit Written Comments
Proposed Rule 1495

Mr. Soltani,

Thank you and your staff for yesterday's presentation on the Proposed Rule 1495. I had planned to comment during yesterday's presentation to request an extension of 60 days, to December 15, 2026, in which to submit written comments, but decided instead to submit this request, and some brief comments, in writing. Nevertheless, I request that this letter be included in the record, and I request that the District agree to the extension of 60 additional days for written comments, as expressed by many of the participants in yesterday's presentation.

I own a small business, and the need for extra time for comments is particularly acute for me. I do not have a large staff of scientists to help me analyze and understand the consequences of this proposed rule. I must hire assistance, and those professionals must have time to perform their own analysis and then to educate me. Please consider this situation:

- After months of discussion, the first specific proposal, this proposed rule 1495, was released on Friday, September 18, 2026.
- We are expected to analyze, understand, and write comments by October 15 - a mere twenty-seven days – eight of those days are weekends, leaving only 18 working days – 9 working days from today.
- I also am concerned that the written comment period as proposed ends one day before the proposed rule would go to the Stationary Source Committee. How will the staff have time to digest the comments and consider necessary modifications if you immediately move forward with the proposed rule as written, the very next day?

Furthermore, this is a very busy time for almost all of the stakeholders who are interested - and impacted by - this rulemaking. I know that SCAQMD had no intention of creating a conflict, but between now and the end of October, most of these stakeholders, including myself, will be involved in travel and attendance at the PMA Fresh Summit, The Global Produce & Floral Show, and, ironically, The Methyl Bromide Alternatives Outreach conference.

I am concerned that the rule may have serious detrimental consequences on the breakbulk fruit importations in the Port of Los Angeles. The apparent restrictions the proposed rule would impose appear to be completely unnecessary. As you know, our fumigation operations are undergoing a full, site-specific, health risk assessment, based on actual location data. That risk assessment should be given priority over a chart based on aggregate data, simplified for expediency.

I urge the District to reconsider this proposed rule and allow for the option of sitespecific, health risk assessment-based compliance options.

Finally, I believe extra time is important, because the proposed rule has some flawed underlying assumptions. The District continues to promote "capture and control" technologies as an option. These are not real-world solutions. No control technology, including the one promoted by one vendor, have ever functioned at the scale or efficiency levels the District assumed in its presentation. The technology and the costs estimates presented, cannot be considered actual data; they are guesses that could easily be low by an order of magnitude, and still would be unlikely to function at 86% efficiency.

I have always appreciated the District's approach to relying on science and data. I support the efforts to protect the community's health and safety, and to do it with science-based methods. I am concerned that Proposed Rule 1495 falls short of that standard by relying on averages that do not reflect actual data and I urge the District to allow an extra 60 days for full comments and exploration of how to improve this Proposed Rule 1495, so we can find the right balance to protect public health without causing devastating economic impacts.

Sincerely,

A handwritten signature in black ink, reading "Miguel Cea". The signature is fluid and cursive, with the first name "Miguel" and the last name "Cea" clearly distinguishable.

Miguel A. Cea

President

Ag-Fume Services, Inc.